

BIRMINGHAM
BRISTOL
CAMBRIDGE
CARDIFF
EDINBURGH
GLASGOW
KINGS HILL
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOUTHAMPTON

**BARTON
WILLMORE**

bartonwillmore.co.uk
26 Kings Hill Avenue
Kings Hill
West Malling
Kent
ME19 4AE

Brenda Louisy-Johnson
Principal Planning Officer
Arun District Council
Directorate of Place
First Floor, Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

VIA EMAIL

20928/A3/HH/sjo

23 July 2021

Dear Ms Louisy-Johnson

LAND NORTH OF SEFTER ROAD, PAGHAM
RESERVED MATTERS PLANNING APPLICATION REF. P/49/21/RES - RESPONSE TO
DESIGN PANEL REVIEW

Following on from our discussion at our meeting on 16 July, I write to provide a response to comments and feedback received from Design Panel Review (DRP) Members at the DRP that took place on 6th July. An interim response was sent to the Council on 20th July and following receipt of the DRP Report, this letter supersedes our previous response.

In term of the DRP comments, it is important to remember that this is a Reserved Matters Application pursuant to an Outline planning consent which has already established key principles on how the development should be laid out. The masterplanning process has evolved over a number of years with initial design proposals for the site having been prepared in 2012 and Development Concept Plans being used to assist initial discussions with Arun District Council and to support the promotion of the site through the Local Plan process.

This Reserved Matters Application has sought to address the reasons for refusal of the previous RM Application (ref. P/24/20/RES) as detailed within the Planning Statement and shown within the submitted documents. In summary, this RM Application omits the potential primary school/care home/additional residential site from the application boundary and the RM design and layout has been considered with the location of the school in mind. It is important to note that the Development Framework Plans within the Outline consent provided flexibility for either of the 3no. options for this parcel of land to come forward.

The housing mix set out within the RM Application has been revised and is compliant with Policy H DM1 and Policy AH SP2 of the Arun Local Plan. The car and cycle parking provision has also been reviewed and refuse vehicle tracking information provided for the relevant length vehicle. Adequate



Arboricultural information has been provided to address the Council's previous concerns. Furthermore, since the first RM Application was refused, the Applicant has been continually engaging with ADC with regards to the revised Design Code and Reserved Matters layout for the site and the design and layout has been refined following feedback received from the Council. We are pleased that the Council have confirmed that this revised RM Application has indeed addressed the previous reasons for refusal.

Response to DRP Key Recommendations

- 1. Utilise the anti-tank drain to reinforce the interpretation and ecological value of the heritage asset, add value and improve the sustainable drainage system.*

As confirmed in the DRP, the SuDS does feed into the drain as an outfall. The route would bisect the open space and arguably make it less useable. The drainage strategy for the site has been carefully considered at both the Outline and Reserved Matters stages and agreed with ADC Drainage Officers. We do not consider that further changes to the agreed strategy are appropriate at this stage of the process and would add any significant value.

At the meeting, the SuDS strategy was explained in detail and has been subject to extensive discussions with ADC Drainage Officers over the course of the Outline and Reserved Matters Application. The strategy has been carefully considered to ensure that the existing issues with surface water flooding are appropriately mitigated and can accommodate the future development. There would be no merit at this stage of the process to re-visit the SuDS strategy which has already been agreed with Technical consultees.

- 2. Model different user scenarios to explore how people will move around and beyond the site and incorporate these movements into the design strategy.*

Movement and connectivity is an integral part of the Design Code and this has been carefully considered as part of the overall design approach. We do not consider that there would be any further merit in modelling user scenarios.

- 3. Incorporate the cycle route into the low traffic road layout and make better use of the space released by removing the segregated lane.*

The approach to a segregated route was discussed and agreed with the LPA and is supported by West Sussex County Council Highways.

- 4. Remove the perimeter amenity space and walking route as it creates unusable space and explore different options where rear gardens back onto the boundary and more space is allocated for public use in the heart of the site.*

At the meeting, the purpose of the SANG was explained in that the circular walking route is a mitigation measure to offset recreational disturbance on the Pagham Harbour SPA. The RM layout includes the provision of extensive greenspace (approximately 4.59ha) which also includes a 2.1km walking route around the perimeter of the site. The level of greenspace is significantly in excess of the 1.76ha required as part of ADC's Open Space SPD. This will comprise a range of semi-natural habitats and incorporate a walking route which, it is considered, will accommodate the great majority of routine dog walking by new residents. It is also considered likely to be used to some extent by residents of existing development adjacent to the site. As such, it is considered that this

provision will greatly reduce the level of usage of the SPA/Ramsar site that would otherwise result from the development and may also result in a small reduction in existing usage of the designation by local residents.

The proposed SANG was established within the Outline planning application and subject to consultation with Natural England who confirmed the acceptability of using this approach, in conjunction with financial contributions to the Pagham Harbour SAMM strategy as a method of mitigating impact upon the Pagham Harbour SPA. Therefore, it is clear that the SANG is a key piece of green infrastructure that is required to offset recreational disturbance on the Pagham Harbour SPA.

- 5. Reflect the local vernacular of longer street frontages instead of cul-de-sacs and provide front gardens.*

The proposed design and layout is the result of extensive character appraisal of the local area at both the Outline and the Reserved Matters stage. This is clearly evidenced within the Design and Access Statements and Design Code.

- 6. Redesign the central space as one for all to use, rather than dedicate this primary space to a play area.*

We have taken on board this comment and have introduced 3 further seating areas around the central focal space to encourage greater interaction wider community use.

- 7. Reinforce the power of a landscape-led master plan by foregrounding impactful landscape elements as both structural and character-forming elements of the design.*

The landscape scheme includes extensive landscaping, which accords with the principles established in the approved outline planning application and the accompanying landscape strategy. We consider that the scheme has been heavily landscape-led from the initial masterplanning stages and the consideration of the proposals at the Outline stage. The landscape principles are clearly set out within the Design Code with reference to how the Landscape and Visual Impact Assessment undertaken at the Outline stage has influenced the Reserved Matters layout, with careful consideration of key landscape views and how a strategic landscape vision for the site has been developed (pgs 14 – 17, Design Code).

Other comments raised at the meeting

Layout

DRP Members considered that the school had unduly influenced the layout when it is not known at this stage whether this site would be the site selected by WSCC for the school to be located.

Whilst we accept that WSCC's preferred site for the primary school is at the Summer Lane site, engagement with ADC has considered that the Sefter Road site should be designed to accommodate a primary school should the school at the Summer Lane site not be delivered. With this in mind, previous iterations of the layout were revised to accommodate a diagonal across the site to provide a key desire line towards the school and wider road widths to the school access.

However even if a school was not located at this site, the diagonal spine road provides a desire line towards the existing development in Pagham and services located within the wider village.

DRP Members considered that connectivity could be improved.

We consider that connectivity throughout the site and to surrounding areas has been carefully considered. Furthermore, the layout has been revised to create a diagonal desire line with the purpose of improving connectivity. The development also provides connectivity to the Hook Lane site to the south with the Outline permission including proposals for a 2m wide footway along Sefter Road, connecting to Hook Lane and crossing points. Enhanced cycle connectivity has been considered with this current RM layout providing opportunities to link to future cycle routes to Bognor Regis.

DRP Members considered that there should be a row of Poplar trees along the northern edge.

At the meeting, the landscape architect discussed why poplar trees were not appropriate to be included within the landscape strategy, namely that this species of tree has a high water demand and would not be well suited to a residential site. Instead, a native landscape buffer has been used to this boundary as a more appropriate strategy. The landscape strategy has also been subject to pre-application advice with ADC's Leisure and Landscape Officer and the RM consultation response confirms agreement with the proposed landscape strategy.

DRP Members considered that the anti-tank ditch should be made more of a feature as there are few natural features on the site.

Whilst we appreciate that there are few natural features of interest at the site (largely due to the previous agricultural use), we do not consider that there would be any particular merit in this. In terms of built features, the World War II Infantry Section Post provides an element of historical significance and proposals have been drawn up pursuant to condition 34 attached to the Outline planning consent to demonstrate how the World War II Infantry Section Post will be retained on site and integrated as part of the proposals. (Refer to submission ref. P/96/21/DOC).

Sustainability Strategy

DRP Members queried what the Sustainability Strategy entailed.

The Outline planning permission condition 28 requires an Energy Strategy identifying the principles to be incorporated into the detailed building design as the means of energy conservation, together with on-site energy renewable devices to be submitted prior to commencement of development. The scheme will seek a target provision of on-site renewable energy which will generate an estimated 10% of annual energy requirements.

National Design Code and Building Beautiful

DRP Members considered that the development proposals should have regard to the National Design Code and Building Beautiful principles.

The revised Design Code was drafted following 6 months of discussions with officers and submitted in December 2020. ADC have confirmed that *"the Design Code for the current application illustrates the evolution of the scheme and how it has been carefully and thoughtfully been designed, to deliver the full requirement of AH provision, adequate SANG and walking route compliant with Natural England requirements, movement that allows for connectivity between pedestrian, cycle and car modes of travel within the site and potential for beyond the site in the future, buildings*

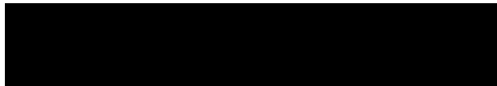
designed to respond to the local context, incorporation of SUDS measures to mitigate flood risk and has sustainability credentials."

We note the principles in respect of 'Building Beautiful' from the Commission report which have been incorporated into the NPPF (July 2021) including development proposals being designed to provide beautiful and safe places as part of the social objective of sustainable development (para. 8b) and the use of masterplanning and design codes to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community (para. 73c). The Design Code for the development has considered ADC Design SPD, the National Design Guide and Building Beautiful principles and provides a cohesive framework of key design principles that the detailed development proposals must align with.

In summary, we consider that the key points raised by DRP Members have been addressed through extensive engagement with ADC on the revised Design Code and Reserved Matters Application. There are some key principles which have been well established through the Outline planning consent which have been called into question by DRP Members and the application documents show a clear rationale for certain design and layout considerations made.

If there is anything else that we can assist with to take this application forward expeditiously, then please do let us know.

Yours sincerely



HARDEEP HUNJAN
Planning Associate

Cc: Lynn Pack – Taylor Wimpey