



---

Agent correspondence pls upload.



Good morning Andrew,

I hope you are well and had a lovely weekend.

We have now reviewed the Parish Councils reasons for objection. Please see below our response.

1. The site was not selected for the revised NDP currently at draft Reg 14 stage.

We do not dispute the fact that the site has not been selected as part of the Neighbourhood Development Plan Review. However, Arun District Council currently have an absence of a 5 year housing land supply with the latest projections in February 2020 comprising a supply of only 2.9 years. We consider that this situation will have likely worsened. Therefore, this black and white conflict is considered to be outweighed by the application of the tilted balance under paragraph 11(d) of the 2019 Framework.

2. It was not recommended by AECOM our independent site assessors that advise the NDP team.

The AECOM SEA work concluded (Table 4-2 Site Assessment Summary Table) of their report that:

*The site is not suitable for allocation in the neighbourhood plan as it does not meet Policy C SP1 or Policy SD SP2 due to its location outside the BUAB. A lack of safe pedestrian access would also be a constraint to development.*

Therefore, the sole reason that other sites were recommended ahead of this site were due to their location within the BUAB. However, the sites that have been put forward by SEA comprise large scale housing sites that will take significant time to develop and subsequently release houses onto the market. By comparison, this site comprises a small-scale site which can be built out relatively quickly (paragraph 68 NPPF 2019).

The comments relating to a lack of safe pedestrian access appears to have overlooked the presence of the public footpath that runs from the north of the site directly into the village of Walberton. This comprises a 10 minute walk. The site is accessible to Walberton via bicycle and was not an impediment to development on the site to the south. Furthermore, West Sussex County Council did not object on the grounds of sustainability under application WA/33/18/OUT and considered access via bicycle to be appropriate.

3. The site is not suitable for allocation in the neighbourhood plan as it does not meet Policy C SP1 or Policy SD SP2 due to its location outside the BUAB

We acknowledge that the site does not fall within the BUAB. All sites that are within the BUAB comprise large-scale sites that will take a long time to deliver units. Equally, the NDP is not at a sufficient stage whereby sites are allocated and Arun District Council can only provide for a 2.9 year HLS at best. Paragraph 68 (NPPF) states that *small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should (c) support the development of windfall sites through their policies and decisions.* As stated above, we consider that the HLS situation will have worsened by the point of determination. Therefore, the tilted balance under paragraph 11(d) would be engaged.

4. A lack of safe pedestrian access would also be a constraint to development

Please see our response to (2) above.

5. The density is inappropriate to the locale at eight dwellings and 2.5 storeys is also out of keeping with the area.

The proposed density of development is less than that of the site to the south to reflect the fringe location with the surrounding strategic gap. However, Arun District Council's Housing Land Supply position and current delivery rates puts pressure on under-utilised land. Paragraph 118(d) of the NPPF states:

*Planning decisions should promote and support the development of under-utilised land... especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.*

In addition paragraph 123(c) of the 2019 Framework makes clear that *where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities, and ensure the developments make optimal use of the potential of each site. In these circumstances (c) local planning authorities should refuse application which they consider fail to make efficient use of land.*

We consider that the proposed densities would ensure the efficient and effective use of a previously developed site in the context of an existing shortage of land for meeting identified housing needs. This is able to be achieved without prejudicing any wider projected landscape view or character.

However, should the Council wish for the design of development to be amended then we are happy to give consideration to amending plans, if this is found to be the only outstanding issue.

Conclusions

This application is submitted in the context of Arun District Council being unable to demonstrate an adequate 5 year Housing Land Supply. This is exacerbated by the current Housing Delivery Test numbers which further emphasised an absence of sufficient delivery.

Whilst it is acknowledged that progress is being made on the Walberton Neighbourhood Development Plan, the site comprises a small-scale development site that can be built out relatively quickly and make a valuable contribution to the housing numbers of the District. The previous application (WA/33/18/OUT) did not receive any technical objection from any statutory consultee and we are not anticipating any deviation under this application.

The sole concern, save for the principal conflict with the BUAB designation which is given limited weight under the tilted balance, comprises the absence of a public footpath. As has been detailed in the submission, the site benefits from pedestrian access to the village via an existing public footpath network, is accessible via bicycle (given its short distance) and larger shopping trips would be undertaken in conjunction with other resident trips. This is typical of any rural village settlement in a location such as this. Therefore, the harms that derive from this development are limited in nature.

To outweigh these impacts, the benefits that derive from this scheme would comprise an additional 8 units towards the Council's Housing Land Supply figures, provision of Council Tax revenue as a local finance consideration, delivery of housing numbers through the effective use of a previously developed site, employment of local workforce in the construction phases of the scheme and biodiversity net gains through a comprehensive landscaping scheme.

Applying the tilted balance under paragraph 11(d), we consider that the benefits outweigh the impacts associated with the development. We respectfully request that the application be recommended for approval.

Look forward to hearing from you with your thoughts on the application and if you require any changes to the design.

Kind regards,

Chelsey Carter

A solid black rectangular box used to redact the signature of Chelsey Carter.