

**APPLICATION FOR FULL PLANNING PERMISSION
FOR THE ERECTION OF 15NO. DWELLINGS
(INCLUDING 4NO. AFFORDABLE UNITS) WITH
ASSOCIATED ACCESS, PARKING, LANDSCAPING,
DRAINAGE AND PUBLIC OPEN SPACE (ADDITIONAL
UNITS TO THOSE APPROVED UNDER APPLICATION
Y/123/21/PL)**

**PLANNING STATEMENT
(INCLUDING AFFORDABLE HOUSING STATEMENT)**

**LAND TO THE SOUTH OF FORD LANE AND EAST OF
NORTH END ROAD, YAPTON, BN18 0DS**

ON BEHALF OF REDROW HOMES (SOUTHERN COUNTIES) LIMITED

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**



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1.0 INTRODUCTION

- 1.1 This planning statement accompanies an application for full planning permission which has been submitted on behalf of Redrow Homes (Southern Counties) Ltd ("the applicant") in connection with land to the south of Ford Lane and east of North End Road, Yapton (the "application site").
- 1.2 In summary the proposals involve the erection of 15no dwellinghouses at the application site, including 4no. affordable units.
- 1.3 The wider site has previously been the subject of outline and reserved matters planning permissions for 100 dwellinghouses which, with the exception of the area of land subject to this application, are unaltered by the proposals.
- 1.4 The application site was previously shown as part of the surplus public open space approved under the reserved matters application; the reduction in the size of this area will be addressed as part of this statement. It also included a drainage attenuation basin that has been relocated as part of these proposals.
- 1.5 This statement sets out the background to the application and identifies the planning policy framework within which it should be considered. It identifies the key planning issues that will need to be considered during the application process and explains how the development proposals have responded to the site specific constraints including how it relates to the previous permissions. The conclusion reached is that planning permission should be granted for the proposed development.
- 1.6 In addition to this statement, covering letter, application forms and requisite fee, the application is accompanied by a location plan, a full set of layout drawings, house types brochure, heritage statement, design response and landscaping drawings.

2.0 SITE DESCRIPTION AND LOCATION

- 2.1 The application site is located within the village of Yapton which lies between Barnham, Littlehampton and Bognor Regis. Yapton is defined as one of the 'Six Villages' in the adopted Local Plan (a 3rd tier settlement).
- 2.2 Yapton has a range of services which are within walking distance of the site, including two GP surgeries and a primary school. A number of small businesses are also based within the village. The nearest railway station is two miles away at Barnham, and the village is served by bus routes from Littlehampton to Bognor Regis and Chichester, and from Yapton to Bognor Regis.
- 2.3 The application site forms part of a wider site that was the subject of previous applications, and which comprised a 6.7ha field between North End Road, Ford Land and public footpath 358. The site that is the subject of this current application is a 1.6ha area that formed the south eastern corner of the wider site. It is bordered by Orchard Business Park to the west and dwellings fronting Church Lane to the south.
- 2.4 Public footpath 357 crosses the application site diagonally from the north west to the south east where it joins public footpath 358 adjacent to Church Lane. Footpath 358 starts in Church Lane and continues in a straight line north towards Ford Lane along the eastern boundary of the site and the historic field boundary. Public footpath 359 is located close to the south eastern boundary of the site, leaving the site in a north-easterly direction.
- 2.5 The site lies within the Chichester to Yapton Coastal Plain where characteristics include low lying flat open landscape and long views. At a local level, the site's character type is intensive arable farmland with relatively large fields across relatively flat landform.
- 2.6 The site is not subject to any fluvial flood risk as it is situated in Flood Zone 1, as classified by the Environment Agency. There is a small area at low/medium

risk of surface water flooding to the south and as with the previously approved dwellings, foul water drainage can be disposed of via the Ford Wastewater Treatment works which serves this part of Yapton.

- 2.7 St Mary's Church, believed to be from the late 12th to early 13th century, is located to the south east of the site and is a Grade I listed building. The churchyard is surrounded by trees which provide particularly dense cover to the rear between the church and the application site. Two other listed buildings are located to the south side of Church Lane; Church House, which is opposite the church lychgate, and Park Lodge, which is further west along Church Lane.
- 2.8 The Yapton (Church Lane) Conservation Area is tightly drawn around the church, Church Farm House and the two listed buildings on the south side of Church Lane. Church Farm House is an unlisted residential property. The application site touches the north western boundary of the Conservation Area where it borders part of the extended garden to Church Farm House beyond the churchyard. The listed building and conservation area issues are addressed in the heritage statement.
- 2.9 The site is located within the Built Up Area boundary of Yapton, as set out on the Arun Local Plan Policy Map 2 (Central), updated September 2018. It is located within the Yapton Neighbourhood Plan area, and whilst it was not within the built up boundary on the original (October 2014) "made" version, the emerging reviewed Neighbourhood Plan includes the site within this boundary. This plan has been submitted to Arun District Council and was subject to a Regulation 16 consultation between 4th November 2021 and 6th January 2022. Significant progress is therefore being made on the plan, and it should be given moderate weight.
- 2.10 The site is not affected by any other statutory or local designations.

3.0 RELEVANT PLANNING HISTORY

- 3.1 Outline application Y/80/16/OUT was refused permission on 16th February 2017 but subsequently allowed on appeal for a residential development comprising the following:

"Resubmission of outline planning permission Y/60/14 for 4.5 hectares of residential development comprising 3.4 hectares of land for up to 100 dwellings (up to 30 (30%) affordable housing) together with 1.1 hectares of land set aside for public open space and strategic landscaping and 2.2 hectares of public open space and green corridors, with vehicular access from Ford Lane and pedestrian/cycle access from North End Road."

- 3.2 The outline permission was granted with all matters other than means of access reserved for subsequent approval, with Condition 1 of the permission identifying that the reserved matters application should include details of appearance, landscaping, layout and scale.

- 3.3 Originally, a reserved matters application was submitted on 4th February 2020 and validated on 11th February 2020 under reference Y/19/20/RES. The description of the development as validated by the LPA was as follows:

"Approval of reserved matters following outline consent Y/80/16/OUT for 4.5ha of residential development comprising 3.4ha of land for the erection of 100 No. dwellings (up to 30 (30%) affordable housing) together with 1.1ha of land set aside for public open space & strategic landscaping and 2.2ha of public open space and green corridors with vehicular access from Ford Lane & pedestrian/cycle access only from North End Road."

- 3.4 The application was refused under delegated powers on 12th May 2020 with four reasons cited. These related to design, layout, drainage and affordable

housing clusters.

- 3.5 The applicant lodged an appeal following this refusal, however they also submitted a revised reserved matters application to respond to the issues identified within the reasons for refusal which was validated in August 2020 under reference Y/82/20/RES. The description of the development as validated by the LPA was as follows:

"Approval of reserved matters following outline consent Y/80/16/OUT for 4.5ha of residential development comprising 3.4ha of land for the erection of 100 No. dwellings (up to 30 (30%) affordable housing) together with 1.1ha of land set aside for public open space & strategic landscaping and 2.2ha of public open space and green corridors with vehicular access from Ford Lane & pedestrian/cycle access only from North End Road (resubmission following Y/19/20/RES)."

- 3.6 The application was approved under delegated powers on 10th November 2020. Following approval of reserved matters, the appeal was withdrawn. Various conditions have been discharged and the development has commenced on site, meaning that the reserved matters approval has been implemented.
- 3.7 Finally, an application to vary Condition 1 (approved plans) of the reserved matters permission was submitted in August 2021 and allocated reference **Y/123/21/PL**. The application was approved in December 2021. These amendments have facilitated the latest application for an additional 15 units and as such the development within the 'blue line' on the proposed layout plans is that approved under the variation application (A958 01 Rev F).

4.0 THE PROPOSED DEVELOPMENT

- 4.1 The proposed development is for the erection of a further 15no. dwellinghouses at the site in addition to the previously consented dwellings that are now being implemented. The additional dwellings will be located within the south eastern section of the site that has a western boundary with Orchard Business Park as highlighted by the red line on the Planning Layout drawing.
- 4.2 A mix of three, four and five bedroom dwellings are proposed, comprising 11no. market dwellings and 4no. affordable dwellings.
- 4.3 Access will be taken from a previously approved internal road; Plots 101-103 would utilise a part of the road that has been part of previous approvals, with the remaining 12 units accessed via an extension to the internal road. Parking would either be on-plot, on driveways and in garages, or within a parking court that serves Plots 110-115. Full plans and elevations of all the new dwellings are provided within the house types brochure, and the mix is set out below:

Dwelling Type	Number of Units					
	Market		Affordable		Total	
3 bed house	6	50%	4	100%	10	67%
4 bed house	4	40%	0	0%	4	27%
5 bed house	1	10%	0	0%	1	6%
TOTAL	73		27		100	

- 4.4 All of the proposed dwellings will be two storeys in height.
- 4.5 The additional road is shown to incorporate the previously approved footpath on the eastern side to ensure that this access through the site is maintained as previously. Hard and soft landscaping is proposed around the dwellings which would be consistent with that previously approved as part previous applications.
- 4.6 The land that is the subject of the application was previously shown to

accommodate an area of public open space together with an attenuation basin and a play area. The basin has been relocated further east under the recently approved variation of condition application. Whilst that approval included the play area to the west of the footpath, it is now proposed under this application to relocate this further east in order to accommodate the additional dwellings. The remainder of the land will remain open space as previously, and whilst the development would result in a reduction in public open space in comparison to that previously approved, this is addressed below.

5.0 PLANNING POLICY FRAMEWORK

5.1 This section refers to relevant national planning policy and guidance as well as Development Plan policies that provide the planning policy framework within which this application should normally be considered. It deals with the following layers of policy and guidance:

- National Planning Policy Framework
- Planning Practice Guidance and National Design Guide; and
- The Development Plan

National Planning Policy Framework

5.2 National planning policy is set out within the Government's National Planning Policy Framework (NPPF), of which the latest version was published in July 2021. The NPPF confirms that planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in determining planning applications.

Sustainable Development

5.3 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

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- 5.4 Footnote 8 to Paragraph 11 clarifies instances when the policies that are most important for determining the application should be considered out of date, which include, for applications involving the provision of housing, situations where then LPA cannot demonstrate a five year supply of deliverable housing sites with an appropriate buffer.

Delivering a sufficient supply of homes

- 5.5 Guidance in relation to delivering a sufficient supply of homes is provided at Paragraphs 60 to 80. The government's clear and over-arching requirement is to significantly boost the supply of housing, to meet identified needs and to promote growth. This will require LPAs to assist in bringing suitable sites forward for development at the earliest opportunity in the plan period.
- 5.6 Specifically, Paragraph 79 sets out that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

Promoting healthy and safe communities

- 5.7 Paragraph 92 requires plans and decisions to aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and which are designed to support and enable healthy lifestyles.
- 5.8 The importance of access to a network of high quality open space and opportunities for sport and physical activity for the health and well-being of communities is set out in Paragraph 98 with protection being afforded to existing facilities and rights of way set out in Paragraphs 99 and 100.

Promoting Sustainable Transport

- 5.9 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development. Relevant to this application, it is stated at Paragraph 111 that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.10 Paragraph 112 then continues to set out the requirements for applications in this context, stating that they should give priority first to pedestrian and cycle movement and secondly, as far as possible, facilitate access to high quality public transport. Developments should also address the needs of people with disabilities and reduced mobility, create places that are safe, secure and attractive, allow for the efficient delivery of goods and access by service and emergency vehicles, and be designed to enable charging on plug-in and other ultra-low emission vehicles.

Making effective use of land

- 5.11 Paragraph 119 confirms that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 120 states that decisions should promote and support the development of under-utilised land, especially if this would help meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.
- 5.12 As part of the approach to securing the effective use of land, the NPPF continues at Paragraph 124 to set out the approach to ensuring appropriate densities, requiring decision makers to take into account the identified need for different types of housing and the availability of land suitable for accommodating it, the availability and capacity of infrastructure and services, the desirability of maintaining an area's prevailing character and setting, and the importance of securing well-designed, attractive and healthy places.

Achieving well-designed places

- 5.13 Guidance on design is set out at Paragraphs 126-136. Paragraph 126 sets out the importance of good design in sustainable development and that planning policies should be clear about design expectations as this is essential to achieving well designed places.
- 5.14 Paragraph 130 seeks to ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, inclusive and accessible, which promote health and well-being with a high standard of amenity for existing and future users.
- 5.15 Paragraph 132 sets out that design quality should be considered throughout the evolution and assessment of individual proposals. Paragraph 134 summarises the approach, advising that permission should be refused for developments of poor design that fail to take the opportunities available for improving the character of an area and the way it functions. It goes on to state that, conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to development.
- 5.16 The application is accompanied by a Design Statement that recognises the importance of good design and the steps taken to provide a high quality and well-designed development.

Meeting the challenge of climate change, flooding and coastal change

- 5.17 Paragraphs 152-173 advises LPAs that when determining planning applications, they should ensure that flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding.

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- 5.18 Drainage details for the wider site were approved in conjunction with the reserved matters application, and have been amended via the approved variation of condition application. The proposals accord with these details.

Conserving and enhancing the natural environment

- 5.19 Paragraph 174 explains that the planning system should contribute to and enhance the natural and local environment by amongst other things protecting and enhancing valued landscapes and minimising impacts on biodiversity, and providing net gains in biodiversity where possible. Further guidance on biodiversity issues is set out in Paragraph 180.

- 5.20 Condition 17 of the outline planning permission required the development to be carried out in accordance with the recommendations of the Extended Phase 1 Habitats Survey submitted with that application, and although relating to a different development it is considered that this remains relevant to this new proposal.

Conserving and enhancing the historic environment

- 5.21 Paragraph 194 explains that in determining planning applications, LPAs should require applicants to describe the significance of any heritage assets affected. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 5.22 Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. When considering development proposals that could harm a heritage asset or its setting, the guidance at paragraphs 201 and 202 is applicable. Paragraph 201 relates to substantial harm, whereas Paragraph 202 relates to "less than substantial harm" and states that where this occurs, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum

viable use.

- 5.23 Paragraph 203 relates to the consideration of a non-designated heritage asset where a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 5.24 A Heritage Statement, dated 18th November 2021, has been prepared by Pegasus Group in support of the application which assesses the impact of the proposed development on the historic environment. Although the site does not contain any listed buildings and does not fall within the boundaries of any Conservation Areas, it has the potential to impact on the significance of nearby heritage assets through a change in setting. Therefore, as required by Paragraph 194 of the NPPF, a level of detail proportionate to these assets' importance is provided.

Planning Practice Guidance

- 5.25 In March 2014 the government issued revised and updated Planning Practice Guidance (PPG). This national guidance is intended to provide a simplified and clear guide to the planning system, making it more accessible and easier to keep up to date. It superseded a plethora of previous technical guidance.

National Design Guide

- 5.26 In October 2019 the government published the National Design Guide (NDG) to illustrate how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools. In addition to informing development proposals and their assessments by LPA's, it supports Paragraph 134 of the NPPF which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

The Development Plan

5.27 At the time of writing, the Statutory Development Plan for Arun District Council comprises the:

- Arun Local Plan 2011-2031
- Yapton Neighbourhood Plan 2014-2029

Adopted Arun Local Plan

5.28 The Arun Local Plan was adopted in July 2018 and covers the plan period up to 2031. Policies relevant to the consideration of this application include the following.

5.29 **Policy SD SP1 (Sustainable Development)** sets out the presumption in favour of sustainable development, which reflects that within the NPPF and states that the Council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.

5.30 **Policies SD SP2 (Built-up Area Boundary) and C SP1 (Countryside)** relate to the approach to development proposed within and outside the established settlement boundaries across the District. For the purposes of this application, the site is located within the built up area boundary of Yapton.

5.31 **Policy H SP1 (Housing Requirement)** sets that at least 20,000 new homes must be accommodated within the District within the plan period. This includes an additional 500 homes in Yapton.

5.32 **Policy H DM1 (Housing Mix)** advises that the Council will seek a mix of dwelling types and sizes, to include affordable housing units, that adhere to the latest Homes and Communities Agency design guidance. For developments of 11 units or more the Council shall require a balanced mix of market and

affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations. The tenure mix for development schemes shall be negotiated on a case by case basis taking any necessary viability considerations into account. Developers shall have regard to the most up to date version of the SHMA.

- 5.33 **Policy AH SP2 (Affordable Housing)** advises that for all developments of 11 residential units or more the Council will require a minimum 30% of the total number of units proposed on site to be provided as affordable housing on the same site in the first instance. It goes on to advise that the Council will negotiate the affordable housing tenure mix, require affordable housing to be visually indistinguishable from the open market housing, large groups of single tenure dwellings or property types to be avoided, affordable housing units to be provided in small clusters, a specific affordable housing mix to be provided, etc.
- 5.34 In terms of the proposed scheme, the affordable mix for the site is set out in the Affordable Housing Statement in Section 6 of this Statement, and housing mix is discussed in more detail in Section 7.
- 5.35 **Policy D DP1 (Design)** advises that all development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development. Furthermore, **Policy D DM1 (Aspects of form and design quality)** also applies and provides development management criteria that will be used for the consideration of any application for development.
- 5.36 The application provides a comprehensive drawing package which sets out a development that makes an effective use of land within the wider site and

responds positively to the character of the site, previous proposals and local area.

5.37 **Policy D DM2 (Internal Space Standards)** advises that the LPA will require internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs.

5.38 **Policy HWB SP1 (Health & Wellbeing)** states that all development shall be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities. Regard shall be had to, inter alia, providing or contributing to the necessary infrastructure to encourage physical exercise and health, including accessible open space, sports and recreation facilities (including outdoor fitness equipment) and safe, well promoted walking and cycling routes. **Policy OSR DM1 (Open Space, Sport and Recreation)** requires housing development to contribute towards open space provision.

5.39 The approval of the wider scheme secured over 3ha of land for use as public open space, parkland and green corridors, play areas, the retention of existing public rights of way and the creation of new footpaths and cycleways for public use. The new application has amended the open space proposals, which shall be assessed in Section 7 below.

5.40 **Policies ECC SP1 (Adapting to Climate Change) and ECC SP2 (Energy and climate change mitigation)** deal with adapting to the impacts of climate change and energy efficiency measures. The development will include a range of energy efficiency methods as discussed in Section 7 and site specific methods such as SuDS to ensure that development is in accordance with these policies.

5.41 **Policies T SP1 (Transport and Development) and T DM1 (Sustainable Travel and Public Rights of Way)** advise that the Council will ensure that developments provide safe access on to the highway network, contribute to highways improvements, promote sustainable transport including the use of

low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network and ensure the ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network.

5.42 The outline application that was allowed on appeal established the location of the site as sustainable and that the development could be well-integrated, legible and permeable by walking and cycling. Access to the site was approved as part of the outline application from Ford Lane. Pedestrian/cycle routes remain as approved including the PROWs through the site.

5.43 The following development management policies deal with the historic environment:

- **HER SP1 – The historic environment**
- **HER DM1 – Listed Buildings**
- **HER DM2 – Locally listed buildings or Structures of character**
- **HER DM3 – Conservation Areas**
- **HER DM6 – Sites of Archaeological Interest**

5.44 The outline planning permission established that there would be no harm to heritage assets as a result of the outline proposal for 100 dwellings, including the setting of the Grade I St Mary's Church. Previous conditions have secured the safeguarding of archaeological interests. A Heritage Statement prepared by Pegasus Group is submitted as part of the application and considered in more detail below.

5.45 The following policies deal with the natural environment:

- **ENV SP1 – Natural Environment**
- **ENV DM4 – Protection of Trees**
- **ENB DM5 – Development and Biodiversity**

5.46 An extended Phase 1 Habitat Survey was carried out as part of the original outline planning application, a condition of which required updates to the survey prior to the commencement of development and measures proposed to avoid or mitigate ecological impacts and provide ecological enhancements. Detailed ecological measures were approved under discharge of condition application Y/131/20/DOC. Ecological matters in respect of the new scheme are discussed below.

5.47 In terms of trees, a detailed landscaping scheme by Fabrik Landscape Architects forms part of the application, setting out the landscaping proposals including trees for this part of the site.

5.48 With regards flood risk and drainage, the following policies are relevant:

- **W DM1 – Water Supply and Quality**
- **W DM2 – Flood Risk**
- **W DM3 – Sustainable Urban Drainage Systems**

5.49 In respect of previous proposals, drainage and foul water proposals were secured via the outline and submitted as part of the reserved matters applications, and amended via the recently approved variation of conditions application. No further changes to the drainage scheme are proposed.

5.50 Furthermore, a sufficient water supply will be provided to all occupiers of the site, and as with previous applications the Applicant proposes to introduce into the design water efficiency measures that will meet the standards of 110 litres/person/day.

5.51 A number of amenity related policies are relevant to the proposal, and considered further below:

- **QE DM1 – Noise Pollution**
- **QE DM2 – Light Pollution**
- **QE DM3 – Air Pollution**

Yapton Neighbourhood Plan

5.52 The Plan was “made” in October 2014 and covers the plan period from 2014 to 2029. Given its age alone, it does not benefit from the additional protections set out in NPPF paragraph 14.

5.53 **Policy H1 (Housing Requirement)** sets out that a minimum requirement for Yapton will be established by the now adopted Arun Local Plan, now confirmed to be 500 homes.

5.54 **Policy H2 (Dwelling Size)** sets out the housing mix for developments of 15 or more dwellings for open market and affordable units as follows:

- 1-bed dwellings: 10-15% of all dwellings
- 2-bed dwellings: 25-35% of all dwellings
- 3-bed dwellings: 45-55% of all dwellings

- 4+ bed dwellings: 5-10% of all dwellings.

5.55 The proposed mix is set out above and is discussed further in both the Affordable Housing Statement and Section 7 below.

5.56 **Policy PK1 (Parking Standards for new residential development)** states that for all new residential developments, the following standards should apply for the provision of off-road parking:

- 1 bed house/flat – 1 off-road car parking space
- 2-3 bed house/flat – 2 off-road car parking spaces
- 4 bed house/flat – 3 off-road car parking spaces
- 5+ bed house/flat – 4 off-road car parking spaces

5.57 The parking proposals are set out on the parking plan which accompanies this application showing the quantum proposed and the location/type of spaces.

5.58 Other relevant policies in the adopted Neighbourhood Plan are identified below. The requirements of these policies reflect those in the similar policies contained in the adopted Local Plan that have already been considered:

- **Policy E1 – Protection of high value agricultural land**
- **Policy E4 – Minimising the environmental impact of development**
- **Policy E5 – Retention and enhancement of biodiversity**
- **Policy E6 – Green Infrastructure and development**

- **Policy E11 – Minimising the impact of flooding from development**

Supplementary Planning Documents

- 5.59 The **Arun District Public Open Space, Playing Pitches and Built Facilities SPD** was adopted in January 2020 and provides guidance on the design principles of new provision, Minimum size and buffer zones are suggested for different typologies of open space and play space together with principles of designing successful play spaces. Size requirements are generated by the Council's *Open Space and Play Calculator*.
- 5.60 The **Parking Standards SPD** provides guidance on parking standards for all types of development across the district. Notable provisions include recommended levels of cycle provision and that all new houses with a driveway and garage will be required to provide active EV charging points.
- 5.61 The **Arun Design Guide** was adopted in January 2021 and has been prepared to provide further guidance on design policies contained within the Local Plan.

Housing land supply

- 5.62 The Council's current housing land supply was confirmed within the recent appeal decision concerning Land South of Barnham Station, dated 5th January 2022 (reference APP/C3810/W/21/3273087). Within this decision, the appeal Inspector concluded with regards to housing land supply, at Paragraph 113, that *'the deliverable supply is at best 2.63 years. There is little to indicate that the situation will markedly improve in the long term.'* The scale of the shortfall was described as 'substantial', with the deprivation of opportunity to secure a home for those in housing need 'significantly harmful'. Consequently, the public benefit of deliverable housing supply was given substantial weight in the overall balance.

6.0 AFFORDABLE HOUSING STATEMENT

- 6.1 A scheme for the provision of affordable housing is required to be submitted and approved as part of the development. The following sub-sections provide the necessary details relating to affordable housing at the site.

Quantum

- 6.2 The current proposals include 15 homes of which 4 homes will be affordable housing. This would equate to 27% of the proposed additional dwellings which is acknowledged to be below the policy requirement of 30%. However, when assessed across the whole site, the proportion of affordable housing is 30%.

Type

- 6.3 Across the wider site the affordable properties comprise a range of 1 and 2 bedroom flats and 2, 3 and 4 bedroom houses. The additional housing under this application would provide 4no. three bedroom houses.

Tenure

- 6.4 The tenure would be split between 3no. affordable rent unit (75%) and 1no. shared ownership unit (25%). This is broadly reflective of the tenure mix across the wider site.

Design

- 6.5 It is standard practice that the affordable housing will be designed in order that it is "tenure blind". That is to say that the quality in the design and materials of the affordable housing will be no less than that of the open market housing.

Distribution

- 6.6 In terms of the additional fifteen units, the affordable housing is proposed in a single cluster to be integrated with the open market housing as identified on the Affordable Housing Plan that accompanies the application. The cluster would be appropriately sized, and not adjacent to any other affordable housing cluster on the wider site.

Timing

- 6.7 The proposed affordable housing will be delivered alongside the open market housing. This can be controlled by s.106.

Discussions with Providers

- 6.8 The applicant is in the process of discussing the affordable housing with several registered providers. This will progress in parallel with the development of the wider site, for which an affordable housing scheme was discharged under application **Y/116/20/DOC**.

Affordability

- 6.9 It will be ensured that the affordable housing provision remains affordable for both first and subsequent occupiers. This will also progress in parallel with the wider site, for which an affordable housing scheme was discharged under application **Y/116/20/DOC**.

Occupancy Criteria

- 6.10 Similarly, the occupancy criteria to be used for determining the identity of occupiers of the affordable housing and the means by which such occupancy will be enforced has been provided in the affordable housing scheme, and will be progressed in parallel with the delivery of the wider site.

7.0 ASSESSMENT

- 7.1 Previous applications have established the principle of 4.5ha of residential development on the wider site for 100 dwellings at a net site density of 29dph.
- 7.2 The current application proposes an additional 15 units which will sit alongside the 100 units previously consented. Application plans are shown with the scheme currently under consideration (application **Y/123/21/PL**) and the additional units would not affect the implementation of any of these consented units.
- 7.3 This section of the Planning Statement will address the key issues that will be considered under the current application. Affordable Housing has been dealt with in Section 6 above.

Principle of the Development

- 7.4 The principle of the erection of 100 dwellings on the site has been established via previous applications, and the current proposal seeks permission for an additional fifteen units. These would sit alongside the previously consented units and as proposed under application **Y/123/21/PL**; consequently, the 100 units are shown within the blue line, and the application site that is denoted by the red line only includes the part of the overall site that is affected by the current proposals. It should therefore be clear how the site will be built out when fully complete.
- 7.5 The site is located within the Built Up Area boundary of Yapton, as set out on the Arun Local Plan Policies Map. Local Plan policy SD SP2 states that development should be focused within such areas. Whilst it is noted that Policy H SP1 allocates an additional 500 homes in Yapton, the policy sets out a requirement for at least 20,000 new homes with the plan period and the number of homes allocated within the plan falls a long way short of this figure. As such, there is clearly an expectation for additional sites in the built up area

to come forward.

- 7.6 The additional fifteen homes proposed by this application would make a contribution towards the overall figure and are in a location where additional housing should be proposed. The NPPF at Paragraphs 119 and 120 encourage an effective use of land particularly if it would help meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.
- 7.7 Then recent Barnham appeal decision has confirmed that the Council can only currently demonstrate a 2.63 years supply of deliverable housing sites, with little to indicate that this will improve in the short term. The Inspector concluded that this scale in shortfall is substantial and the consequential deprivation of opportunity to secure a suitable home significantly harmful. The proposed development would result in additional homes to an existing development site within the built up area boundary of Yapton, resulting in a more effective use of the site. Given the Council's recently established housing land supply position, this should be given substantial weight.
- 7.8 However, it is acknowledged that this should not be at the expense of other parts of development, such as public open space and play areas, therefore these matters are addressed further below.
- 7.9 Although we consider that the development is in accordance with the Development Plan, the land supply position also means that if the Council for any reason do not agree then Paragraph 11(d) of the NPPF is engaged by virtue of Footnote 8.
- 7.10 Although the site is outside the built up boundary as defined by the currently adopted Yapton Neighbourhood Plan, as this was made in 2014 and the Local Plan in 2018 the Local Plan boundary must take precedence¹. In any case, an updated version of the Neighbourhood Plan has been submitted to the Council

¹ See s.38(5) of the Planning and Compulsory Purchase Act 2004

which proposes that the built up boundary be extended to cover the application site², bringing the Neighbourhood Plan in line with the Local Plan. Given the advanced stage of the Neighbourhood Plan, this should be given moderate weight and the designation within the existing Neighbourhood Plan limited weight. In this context, the site should be considered within the built up area of Yapton.

- 7.11 The proposal is therefore appropriate in terms of its location and consistent with the most important Development Plan policies.
- 7.12 The proposed development is therefore acceptable in principle. The following sections concern other material considerations relevant to this application.

Housing Mix

- 7.13 As set out above, a mix of three, four and five bedroom dwellings are provided of which eleven will be market housing and four would be affordable housing. Local Plan Policy H DM1 does not prescribe a specific housing mix that must be met by individual applications, with the policy stating that each must be considered on its own merits. The supporting text at paragraph 12.2.4 advises that the final mix will be negotiated on a site by site basis, having regard to the most up-to-date SHMA including family sized housing.
- 7.14 It is noted however that Policy H2 of the Yapton Neighbourhood Plan requires developments of fifteen or more dwellings to provide a mix of dwelling sizes that fall within a prescribed mix as set out in Section 5 above. The proposed housing mix differs from that set out within the NP in that it does not propose any one or two bedroom dwellings, and in these circumstances the applicant is required to justify why the mix should be developed on the site in non-compliance with the NP.
- 7.15 The application proposes an existing scheme that will sit alongside an approved

² As confirmed by the Yapton Policies Map Inset 1 (September 2021)

proposal for 100 units, which included a mix of one, two, three and four bedroom units. Viewed in the context of the previous previously approved proposal, the application does not propose a significant number of dwellings and as a result, when assessed in conjunction with the approved mix, the overall effect on the site-wide mix is not significant. Furthermore, as is evident from the layout, the additional units are located adjacent to a part of the wider site where lower density development has been approved, in comparison to the elements towards the western boundary which include two apartment buildings and smaller units.

- 7.16 As such, larger units and a lower density are considered appropriate in this part of the site and ensures that the development would sit comfortably alongside the wider site and form a cohesive and integrated development once complete. Viewed in this context, and that the overall mix across the site as a whole is largely unaffected, it is considered that the mix is appropriate for the proposed development.

Layout

- 7.17 The drawing package submitted with this application sets out the detailed design of the proposed development relating to layout, open space, detailed design and access.

Density

- 7.18 The application proposes an additional 15 dwellings within a 1.6ha portion of the wider site at a low density of 9.3dph which is due to the site containing areas of public open space and a play area which serve the wider site as well. If measured with the wider 4.5ha site, i.e., all development within the red and blue lines, then the density is 25.5dph. This compares to a density of 22.2dph for the original scheme, which shows how the development is making more effective use of the site than before without resulting in a density that would be out of keeping with the wider area.

Amenity

- 7.19 The layout design ensures that development would provide an acceptable level of amenity to future properties. All rear gardens would have a minimum of 11m in length to ensure adequate amenity space. This is consistent with the Arun Design Guide which requires minimum garden depths of 10.5m. There would be no impact on neighbouring residential amenity; the closest neighbouring properties are to the south, with separation distances of 27m to the nearest boundary and 53m to the nearest dwelling ensuring no loss of light, overbearing or overlooking.

Parking

- 7.20 The parking layout is set out on the parking plan that forms part of the drawing package submitted with the application.
- 7.21 The parking layout has been designed in accordance with the Parking Standards within the Neighbourhood Plan with the three bedroom dwellings having two parking spaces, the four bedroom dwellings having three parking spaces and the one five bedroom dwelling having four spaces. The parking will all be provided off-street with a mixture of outdoor spaces and garages. In addition, two visitor spaces are proposed within a layby.

Open Space

- 7.22 The previously approved applications secured areas of open space, strategic landscaping, public parkland and green corridors. This included the buffer to the eastern side of the site and the land to the south.
- 7.23 The proposal would encroach over part of the land to the south to include the additional 15 dwellings which it is acknowledged would reduce the amount of open space by approximately 0.5ha. Whilst it is noted that this area was identified as a buffer within the outline approval, this was only indicative and

would not preclude a subsequent application from being considered on its own merits.

7.24 In terms of the amount of open space, this would reduce from 3.3ha to **2.8ha** across the wider site as a whole. This would still be significantly in excess of the requirements generated by the Council's Open Space and Play Calculator, which for 115 units results in a requirement for **0.8ha** public open space.

7.25 As such, although the development would result in a reduction of the open space approved under previous consents, it would still deliver areas of public open space well in excess of policy requirements. As such, the proposals would not preclude the wider site from being delivered in accordance with adopted policy and guidance.

Access and Movement

7.26 Access to the site would be the same as the wider development; via the means of access approved at the outline stage and amended under the reserved matters application. More locally, the site would utilise an approved internal road which would be used to directly access three units with access to the remaining units off an extension to the internal road to the south.

Movement

7.27 It has been necessary to amend the movement network within the wider site to accommodate the proposals however movement within and through the site would not be compromised. The Public Right of Way leading north-south through the site would remain, the amendment is that this would partially now be provided alongside the access road with an amendment to the crossing point. Movement would remain along the right of way in the same way as previously approved. The wider approved pedestrian/cycle network would not be affected.

Scale and Appearance

- 7.28 The drawing package submitted with the application sets out the detailed design of the proposed development. As discussed, the net density remains appropriate and a variety of house types, tenures and sizes are provided.

Scale, Height and Massing

- 7.29 The proposed development of an additional fifteen units will consist entirely of two storey dwellings with some single storey garages, as confirmed by the massing plan submitted with the application. A variety of heights and massing is achieved through the use of a range of house types and sizes. The development has been designed to be more in keeping with the part of the wider site to which it adjoins, that being the approved dwellings to the south east of the original approval which consists of larger dwellings in more spacious plots, in comparison to the higher density development towards the western and northern boundaries.
- 7.30 Once complete, it is considered that the additional dwellings will be seen as a continuation of the development originally approved rather than a standalone scheme. This is achieved by proposing housing in keeping with the wider approved development in terms of their scale, height and massing, and a density in keeping with the adjoining part of the site.

Continuity and Enclosure

- 7.31 As with the wider site, development plots will be defined by a range of boundary treatments including walls, fencing and hedging, depending on their location, in order to clearly define public and private spaces.
- 7.32 Key frontages such as those fronting the Public Right of Way will be particularly prominent and crucial to the appearance of the development. Particular attention has been paid to the massing and architectural style of these

buildings, so that they contribute positively to the quality and character of the overall development.

Appearance

- 7.33 With regards appearance, the submission includes a House Types Brochure which highlights the detailed design and architectural style of the proposed dwellings and garages to be constructed. This is supplemented by a materials plan which sets out the palette of materials to be used in the construction of the development and how the materials will be used across the site. The materials proposed are similar in appearance to those approved on the wider site.
- 7.34 A street scenes drawing is provided to assist with visualising the appearance of the proposed development across two points. It is considered that this highlights the low density and acceptable appearance of the proposals.

Landscaping and Trees

- 7.35 The landscaping proposals have been informed by the revised proposals with regards to open space, and the details provided have been carefully prepared to be sensitive to the local landscape character, assist in habitat creation, improve the urban edge and provide opportunities for recreation.
- 7.36 The drawing package includes detailed landscaping proposals including details of existing trees and hedgerows to be retained and proposed planting across the site. The detailed planting plans include details of the wider site, but these have simply been updated to include information pertaining to the proposed development and are not intended to alter previous approvals outside of the application site. The details also include Landscape Maintenance and Management Specifications for the protection and enhancement of the landscape fabric of the site.

Sustainable Design and Construction

7.37 As with the wider site, the Applicant is committed to constructing the proposed development in a sustainable and responsible way. A package of climate change and energy measures have been incorporated into the development. These have previously been secured via the approval of an energy report as part of the discharge of conditions relating to the original reserved matters approval and include:

- The Applicant operates a robust Sustainable Procurement Policy which emphasises the legal and sustainable sourcing of building materials;
- The construction specification for the proposed dwellings will achieve A+ to C ratings when assessed against the Building Research Establishment's Green Guide;
- The Applicant will prepare a Site Waste Management Plan during the construction of the development to minimise wastage;
- Eco sanitary ware and flow restriction devices will be installed in every property. A water consumption less than 110 litres per person per day will be achieved;
- The construction specification of every home will include high levels of insulation, an efficient gas condensing boiler, energy efficient light fittings and white goods installed or offered to purchasers with an energy efficiency rating of A+/A.
- The scheme will provide significant areas of green infrastructure and sustainable urban drainage systems to help meet the challenge of climate change;
- Pollution during the construction phase will be minimised through the

adoption of best practice measures with respect to waste, dust and air pollution; and

- Every home will be provided with the relevant waste and recycling receptacles and space for their storage.

7.38 The additional units would incorporate the same measures as the previously approved dwellings, and can be secured via a suitably worded condition.

Flood Risk and Drainage

7.39 The application site is located within Flood Zone 1 where the Environment Agency considers land to have a low probability of flooding (having a less than 1 in 1,000 annual probability of river or sea flooding).

7.40 Surface water attenuation has been secured via previous permissions, with part of the site-wide attenuation located within the red line of the site. The attenuation is not affected by the proposals and remains as approved. This is considered to address any impacts due to the surface water flood area to the south.

Play Areas

7.41 In order to accommodate the additional dwellings, it is necessary to relocate the LEAP located in this part of the site to the east of the public footpath. This was originally proposed as part of the variation of condition application, and it is acknowledged that concerns were previously raised that resulted in its relocation west. These concerns related to the safety of the play area being located close to the attenuation.

7.42 Since the variation application was approved, the applicant has commissioned further study into this area in order to demonstrate that the play area can be safely provided within the location. The play area will be enclosed by perimeter

fencing as will the attenuation basin itself to safeguard the public from accessing the area from the adjacent pathways; the fencing can be secured via a suitably worded condition.

- 7.43 The application will also be accompanied by a water risk assessment, to be submitted shortly, to give the Council additional assurance with regards the safety of this area.

Biodiversity

- 7.44 Previously development of the wider site (which, at the time, included the application site) was required to be carried out in accordance with the recommendations of an Extended Phase 1 Habitats Survey. Additional ecological measures and enhancements were secured via discharge of conditions under application Y/131/20/DOC which included a hedgehog hibernacula close to the location of the proposed additional units.
- 7.45 This will be relocated as a result of the proposals, with all other ecology measures remaining as previously approved. An updated report will be submitted shortly to enable the Council to secure this amendment as part of the application.

Heritage

- 7.46 It has previously been concluded that development of the wider site would not result in any harm to heritage assets including the setting of the Grade I St Marys Church or the Yapton Conservation Area, and that archaeological interests could be safeguarded through the imposition of a suitably worded condition.
- 7.47 As development would project closer to the heritage assets to the south, the application is accompanied by a Heritage Statement prepared by Pegasus Group. The Heritage Assessment assesses the development in the context of

all the nearby heritage assets in some detail, and concludes that given the mix of built form and uses which are already perceptible in views, in addition to the principle of development that has already been established at the site, that the additional dwellings would not result in any changes to the setting of the identified heritage assets that would result in negative impacts to the understanding of their significance. As such, it is concluded that the development would result in no harm to the significance of the heritage assets.

- 7.48 As such, the balance referenced within Paragraph 202 of the NPPF does not need to be applied to the proposals.

8.0 CONCLUSION AND PLANNING BALANCE

- 8.1 This Planning Statement has been prepared in support of an application for full planning permission for the erection of 15 dwellings with associated access, parking, landscaping, drainage and public open space. The additional units would be located adjacent to and sit alongside a scheme of 100 units that was granted permission under application Y/82/20/RES.
- 8.2 The proposed development will sit alongside the established consent and whilst it has resulted in a reduction in open space and relocation of a play area, this application offers the Council the opportunity to assess the acceptability of this. In summary, there has been no reduction to the play area proposal, and open space remains significantly in excess of policy requirements.
- 8.3 The dwellings would be within the settlement boundary of Yapton in accordance with both the current Local Plan and the submitted Yapton Neighbourhood Plan Review, and where development has been accepted on the wider site in the past. It is considered that the mix is justified in the context of the wider site, and the development is acceptable in terms of its layout, scale, height, massing and overall appearance. It would ensure high levels of residential amenity and parking in compliance with adopted standards, and would result in no harm to the significance of heritage assets.
- 8.4 Landscaping and drainage proposals are confirmed, and the application has demonstrated that it would have an acceptable impact on heritage assets. It is therefore considered that the application would comply with relevant development plan policy and national guidance and as such is acceptable. Arun District Council, as the Local Planning Authority, are therefore respectfully requested to **approve** the application consistent with NPPF Paragraph 11(c).
- 8.5 Paragraph 11(c) requires development proposals that accord with the Development Plan to be approved without delay. Even if the LPA was to consider there to be conflict with the Development Plan when read as a whole for whatever reason, then LPA will be aware that it has a substantial shortfall

in deliverable housing supply that has been confirmed within a recent appeal decision. This would engage the tilted balance by virtue of NPPF footnote 8.

- 8.6 In those circumstances the Applicant would contend that the adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits in the context of NPPF paragraph 11d. The proposals would still represent sustainable development and ought to be granted in this context.