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 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 
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**From:** Sue Howell <Sue.Howell@arun.gov.uk>  
**Sent:** 20 August 2025 15:35  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Simon Davis <Simon.Davis@arun.gov.uk>  
**Subject:** Planning Consultation on: Y/32/25/PL

**Response to Planning Application**

**From:** Arun District Council Leisure & Greenspace  
**Date:** 13/06/2025 **Revision to consultation 20/08/2026**

**Application ref:** Y/32/25/PL

**Description:** Erection of 170 No residential dwellings (30% affordable), parking spaces, internal site roads, public surface water drainage features, landscaping and associated works. This application is a Departure from the Development Plan for new dwellings.

**Location:** Land West of Bilsham Road Yapton BN18 0LA

**Determining Authority:** Arun DC

**Summary recommendation:** Layout and green infrastructure provision appears to be compromised to that under the previously approved Y/3/22/OUT application. Play provision in detail NEAP, LEAP and LAP provision has been submitted within **RPS Tetra Tech NEAP, LEAP & LAP Statement-P01 (July 2025) but as advised requires further revision and detail to be submitted**. Play provision for NEAP and LEAP needs to be detailed and approved. Landscaping in general through the street scenes appears sparse with little provision for tree planting across the development. Recommend **an advisory re the landscape proposals** as being lacking in detail and **an objection to the play provision LEAP and NEAP** as not meeting SPD requirements under this application Y/32/25/PL subject to further detail submission to be approved.

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## Comments

### Relevant landscape designations

This proposed development site is approximately 10Ha inc access with previously approved application for 110no plus 30no dwellings under application Y/3/22 OUT. A previous total of up to 140no dwellings proposed across the whole site, further application Y/52/23/PL (appealed) for a total of 170no dwellings, now 170no dwellings under this Y/32/25/PL application

The site is located to the south of Yapton village off Bilsham Road.

There are no Special Protection Area (SPA), Ramsar or Site of Specific Scientific Interest associated with this site.

The majority of the site is arable with grassland margins running around the edge with a limited number of trees and hedgerows on the boundaries.

Public Right of Way (PRoW) 156 is to the west of the site and provides links into Yapton to the north and to part of the southern boundary (PRoW) 148.

South Downs National Park to the north.

## Response

**Revision to consultation following submission of RPS Tetra Tech NEAP, LEAP & LAP Statement-P01 (July 2025)**

Good to see a general theme for the play areas which will run through the whole developments play.

Overall play design – good to see the use of natural materials in this setting, we would not want to see loose fill safety surfacing ie sand or bark chippings but muted coloured surfacing such as rubber crumb/tiger mulch would be supported. We would want to see elements of ground contouring to give interest and create zones of play. We would want to see planting within the play areas – this can be hedging to form physical barriers, tactile planting to give setting and trees which will ultimately give

structure and shade within the play areas. Play area proposals being approved today require delivery with long term vision and need to be as forward thinking as possible.

NEAP – The theme presented is very much a mixed offer aimed at older children giving some exciting and active play with areas for quiet reflection, and socialising, rather than rigid MUGA type provision. Ball stop rebound walls need to be away from dwelling frontages so as not to cause annoyance to residents. The NEAP needs to have more zoning, have a bespoke element and not look like a catalogue of off the peg elements pulled into one space. Mounding can be effectively used to provide hang out space, give some sectioning whilst not totally enclosing the space. Consideration needs to be made re The National Planning Policy Framework (NPPF) which emphasizes creating places that are safe, inclusive, and accessible for all members of society, including women and girls. These principles support inclusion in design by promoting safe and accessible environments, which can help address concerns around safety, with layout, lighting, and active frontages.

LEAP – The LEAP is set within a large open area which would allow space to overflow, which should be considered rather than shoehorning into a rigid confined area. The offer presented falls short of our SPD and Arun Design Guide requirements and does not include true inclusive and accessible features. The LEAP needs to provide a bespoke element and again be zoned to cater for differing aspects of play. Tokenistic inclusive play items would not be supported, these need to be part of an integrated scheme which considers varying abilities and neurodiverse traits which are accessible and provide a scheme suitable for all users.

The LEAP needs to provide impact with its main feature(the detailed boat appears too small in scale) and be age appropriate avoiding low value items such as boulders and logs which are better placed within naturalistic LAPs. The outdoor play timer whilst adding an interesting element would need to consider electrical connection and maintenance going forward. Trim trail equipment should not be used at the expense of other play experiences but could be supported if well integrated within the scheme. Pathways, seating, signage, cycle stands all to be detailed.

LAPS 2no – The LAPS shown have focussed on both naturalistic imaginative play and a more formal offer with swings and slide. Care still needs to be taken when positioning equipment so as not to cause conflict with run off areas. Mounding, planting and seating should also feature within the LAP provision.

**Summary of revision - Further revision to the play offer required and detailed drawings to include sections and specification have been requested.**

This proposals for this site comprise Erection of 170 No residential dwellings (30% affordable), parking spaces, internal site roads, public open space, childrens play space, pumping station, surface water drainage features, landscaping and associated works. This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.

This application is a Departure from the Development Plan and is in CIL Zone and is CIL Liable as new dwellings and affects a Public Right of Way.

This site does not form part of any strategic allocation identified for development in ADCs adopted Local Plan 2011-2031 (July 2018) It would therefore be assumed that CIL contributions would be sought accordingly, these will need to include contributions towards playing pitches, sport, leisure, pools, halls and ancillary facilities as set out in ADC SPD Open Space, Playing Pitches, Indoor and Built Sports Facilities January 2020.

A Landscape and Visual Impact Assessment has been undertaken in relation to the site and the proposed development, concluding that the proposals would have a very slight adverse effect on the surrounding Landscape Character; and significant effects on visual amenity would be restricted to short to medium term effects from viewpoints located in close proximity to the site in particular those from footpaths 156 and 148.

The assessment of landscape and visual effects of the proposed development it states demonstrates that the site is largely visually enclosed by the existing vegetation, topography and built form. That the proposed mitigation and enhancement measures would reinforce existing landscape features, provide an attractive, usable and robust amenity green structure defining the built form with enhanced biodiversity of the site. The LVIA concludes; overall the proposed development will be well related to the existing built up area of Yapton and will form a logical and sustainable extension to the settlement.

Further details have been considered and presented in the landscape and Visual Impact Assessment (LVIA)

The design of the site should promote a high-quality development that respects, maintains and enhances the local landscape character. This new development should consider the character and distinctiveness of the area reflecting local design characteristics where possible and its setting with the surrounding countryside and rural fringe. All nature conservation features within the development site including existing habitats, trees, hedges, watercourses and other features should be incorporated into the site design and protected from change.

Quality, well-designed Public Open Space (POS) will be fundamental to any proposal submission, these will need to accord with Arun District Councils Open Spaces SPD January 2020. There would be requirement for confirmation of the areas of public open space being proposed with this development, and clarification re quantum. There would be a requirement for a minimum 14,025m<sup>2</sup> of usable POS provision excluding SuDS are to be provided for the whole allocation site.

POS areas will need to connect within and beyond the development site promoting and enhancing footpath and cycle links and their use within the wider area. Consideration should be made to the siting of open space and buffer areas and their use in softening and integrating the proposals with any existing residential development on this fringe. POS should be considered not only for the larger open character area shown to the south, the perimeter buffer areas but also to create sense of place, desirable living areas and distinctiveness within the plot areas.

The submitted Block Plan 1100 still appears to show a much denser plot layout to the previously approved application Y/2/22/OUT which previously had a central village green at the heart of the development and greater landscape buffer areas to the periphery. The previously approved masterplan appeared to represent a more sympathetic green infrastructure offer to that shown within this application.

The large open area of POS to the south of the development appears somewhat disjointed from the dwellings to the north with the omission now of buffer zone areas and the large central green which would promote wildlife corridors break up the built form and provide sense of place. SuDS features have been indicated to the south of the site where it would need to be demonstrated that these do not compromise the POS available and existing vegetated tree buffers whilst providing green infrastructure for the proposed development should not be relied upon as serving the POS requirement.

Planting within and enhancing the boundaries has the potential to improve the species composition and diversify the age structure, buffer zone areas will improve screening of properties to neighbouring dwellings. Planting as shown within Illustrative Tree Shrub and Grassland Palette 94-ENV-ECO-21633\_9106\_P02.xls is only indicative at this stage. A full set of landscape proposals will be required further detailed submission detailing species choice, quantities, planting densities and size at time of planting.

This development will trigger the requirement for play in the form of onsite LAPs and LEAP and NEAP provision, where this is indicated it is confusing as to what is being proposed. A NEAP is shown to the most

northern corner of the site but this has no detail of what is envisaged here. It should also be noted that this area is also detailed as a Landscape, Ecology and Biodiversity area within the DAS which would appear at odds with a NEAP.

Play would need to be suitable for location in material choice and play experience offer, be inclusive and accessible in line with the now adopted SPD 13 Arun District Design Guide January 2021. Of note should be Yapton Parish Councils request for provision for older children, which a development of this many units would trigger. **Both a good NEAP and LEAP offer with appropriate facility will be required.** The shown NEAP area appears disjointed from the development with little surveillance opportunity.

LEAP provision needs to be well designed provide a varied and challenging play offer, accessed by all-weather pathways, contain seating, bins, signage, cycle racks and an appropriate number of play experiences. The LEAP needs to consider topography and location and needs to contain a bespoke element with strong theme to the play for the whole development. The standard of play recently secured in Pagham (Hook Lane) and Angmering (North Water Lane) developments represent examples of the standard which will be required for a development of this many dwellings. The LAP provision does not appear to have been detailed within the application.(several natural play LAPs required to contain features such as land form, natural play, boulders, logs, seating and bins)

Off-site allotment contribution would be triggered from a development of 170no units.

SuDS Policy W DM3 of the Arun Local Plan requires development to integrate SuDS into the overall design of the development. The primary purpose of SuDS is to minimise the impact of urban development on the water environment, reduce flood risk and provide habitats for wildlife. SuDS should increase the levels of water capture and storage. It is essential that SuDS do not impact on the usable levels of public open space whilst providing benefit in the correct capacity within the development and should not be included in the 'usable open space calculations' SUDs areas should not be in close proximity to play, advised RoSPA recommendation not within 30m.

Any considered tree works would need to be in consultation with the LPA Tree Officer. There are significant trees in conjunction with this application site which would require protection and retention, of particular concern would be trees and hedgerows where the proposed access into the site is indicated. **Policy ENV DM4 (ALP)** requires development proposals to be supported by tree surveys that take a comprehensive view of trees at an early stage in the design process. Development works should not have a negative impact on existing trees.

## **Impact**

The potential impact on the location would require that Landscaping be provided as mitigation towards screening and softening of the development. Consideration will be required re the access into the site and the impact this may have on existing trees and hedges on this boundary along Bilsham Road.

Early consideration should be made of existing topography and assets, further information concerning the existing hedges across the site and TPO worthy trees will need to be provided. A tree condition survey of the application site will be required to highlight the importance and protection requirements of retaining these trees and hedgerows.

## **Mitigation/requirements**

An existing green boundary is evident in along the boundaries of this site and indicated buffer zones and further boundary planting treatment indicated. A robust and detailed landscape scheme will be required within these proposals for all areas of development and POS to increase biodiversity net gain and habitat within this rural fringe site. Detailed landscape proposals (reserved matters) need to be submitted in plan form detailing species choice, quantities, planting densities and size at time of planting.

All greenspaces should be considered and valued and their connection for biodiversity and habitat explored. Tree specification should be at a size which allows instant impact, but which will establish and mature as the site develops.

**Policy D SP1 (ALP)** requires development proposals to reflect the landscape characteristics of the site and local area.

**Policy D DM1 (ALP)** Public art is recognised as having a significant role in creating successful places and establishing vibrant communities. Public art has the ability to make buildings and places more distinctive, attractive and legible, therefore, public art should be incorporated into design schemes, with encouragement given to richer detailing and use of materials of the built form.

**Policy ENV DM5 (ALP)** requires consideration to be given to increasing biodiversity net gains through utilisation of landscaping measures throughout the site. An Ecological Assessment Ref 794-ENV-ECO-21633 May 2025 has been undertaken and included within the application which concludes that the proposed development would deliver a gain in biodiversity above that required by the NPPF. A full Biodiversity Net Gain Assessment will be required to be submitted detailing what % level net gain is to be achieved post development.

### **Recommendation/Conclusion**

Layout and green infrastructure provision appears to be compromised to that under the previously approved Y/3/22/OUT application. Play provision in detail NEAP, LEAP and LAP provision has been submitted within **RPS Tetra Tech NEAP, LEAP & LAP Statement-P01 (July 2025) but as advised requires further revision and detail to be submitted**. Play provision for NEAP and LEAP needs to be detailed and approved. Landscaping in general through the street scenes appears sparse with little provision for tree planting across the development. Recommend **an advisory re the landscape proposals** as being lacking in detail and **an objection to the play provision LEAP and NEAP** as not meeting SPD requirements under this application Y/32/25/PL subject to further detail submission to be approved.

**Sue Howell**  
**Leisure and Landscape Officer**  
Environment and Climate Change

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 02 May 2025 08:19

**To:** Tree Landscape <[Tree.Landscape@arun.gov.uk](mailto:Tree.Landscape@arun.gov.uk)>

**Subject:** Planning Consultation on: Y/32/25/PL

To: **Parks and Landscapes**

## NOTIFICATION FROM ARUN DISTRICT COUNCIL

**Town & Country Planning Act 1990 (as amended)**

**Town and Country Planning (Development Management Procedure) (England) Order 2015**

### Planning Permission

**Application No:** Y/32/25/PL

**Registered:** 1st May 2025

**Site Address:** Land West of Bilsham Road Yapton BN18 0LA

**Grid Reference:** 497545 102448

**Description of Works:** Erection of 170 No residential dwellings (30% affordable), parking spaces, internal site roads, public open space, childrens play space, pumping station, surface water drainage features, landscaping and associated works. This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 6th June 2025 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can information on what comments we can consider

<https://www.arun.gov.uk/planning-application-comments>

**Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.**

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Mr S Davis

Planning Officer- Arun District Council

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PLCONSULT (ODB) 2020