

Land East of North End Road (Orchard Business Park)
Planning Ref Y/49/18/PL
August 12th 2018

Dear Sirs

Land East of North End Road (Orchard Business Park)
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1. Introduction

Yapton Parish Council (YPC) has given much consideration to the above outline planning application for 10 residential dwellings at land adjacent to Orchard Business Park, North End Road and believe that this application is premature to the Non-strategic Housing Delivery Policy stated in the recently adopted ALP 2011-2031.

The Parish understand ADC's need to accommodate increasing housing numbers but firmly believe, as stated in ADC's own recently Adopted Arun Local Plan (ALP 2011-2031), that non-strategic sites, such as this, must conform with ALP Policy Objective in meeting Housing Delivery ie new housing sites to be considered objectively with all parties especially the local Community:

'The Council will work closely with Town and Parish Councils to ensure that Small Site allocations are appropriately and sustainably located, taking into account all evidence available.'

YPC note that the above application falls short of the newly adopted ALP. YPC believe that more weight should have been applied to the ALP2011-2031 thus avoiding an outdated planning narrative supporting this proposal.

This outdated approach of not taking full account of local planning issues over the last 12 months is also clearly reflected in the applicant's statement claiming; -

'Yapton Parish have no intention of updating the YNP to identify additional sites..' para 6.8 MCC Planning Design and Access Statement

YPC would stress that it has been progressing the means to update its 2014 YNP since notifying ADC in November of 2017. YPC's intent and agreed action being tabled at its January 2018 YPC bimonthly Parish Council Committee and Parish Council Planning Committee meetings where the action to update the YNP was agreed and tabled. Once agreed at YPC's respective Committee Meetings, YPC informed and updated ADC. YPC has a YNP Steering Group in place, funding granted by Locality as well as planning consultants appointed.

It is therefore surprising that the applicant claims that YPC have no intention in considering updating its YNP or indeed its respective housing policy.

Yapton has a large amount of potential small HELAAS and a newly designated Small Strategic Housing Site which the Community must be allowed to consider and decide how

they wish to see their Parish grow in tandem with the Housing Delivery Policy within the ALP 2011-2031. ADC have only issued in the last week the methodology for allocating updated housing numbers for Parishes again reflecting the applicant's premature action.

2. Location and Character of the Site

The site is situated on the western outskirts of the village. It lies outside the villages' BUAB as designated within the newly adopted ALP 2011-2031.

The plot is bounded by residential properties. However, and most importantly, it is a small vacant plot adjoining Yapton's only Employment Zone – Orchard Business Park. Orchard Business Park consists of a strong mix of small industrial units with good occupation rates. It is a vital employment area for Yapton's growing community. The loss of such a key economic contributor to the village would be both detrimental to the Community's economic and social wellbeing and sustainability. The loss of this land would be contrary to the ALP 2011-2031 Employment Land Policy EMP DM1.

3. Planning

The proposal fails to meet key policy criteria set out in the National Planning Policy Framework (NPPF), and more importantly those of the newly adopted ALP 2011- 2031. Finally, it disregards the made YNP along with YPC's commitment to updating this document considering ADC's drive to allocate additional Non-strategic housing sites in conjunction with Communities.

The site lies outside of the existing built-up areas as defined in the ALP. The applicant has not allowed for full and meaningful community engagement as stated in ALP 2011-2031 Chapter 12 Housing delivery

'The Council will work closely with Town and Parish Councils to ensure that Small Site allocations are appropriately and sustainably located, taking into account all evidence available.'

The applicant has failed to engage with both Yapton residents and YPC, having not pursued trying to find a meeting date to suit a quorum of YPC Councillors in April 2018.

3.1 Arun District Local Plan 2011-2031

3.1.1 YPC has stated its concern at the loss of land adjoining its only employment area. This land should be retained for future expansion of the existing Business Park in line with ALP 2011-2031 own policy:

Policy EMP DM1 Employment Land: Development Management.

1. Enhancement of employment premises and sites The Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy.

2. Protection of existing employment premises and sites Existing employment sites and premises will be protected where there remains a reasonable prospect of employment use.

Excepting Permitted Development Rights or Local/Neighbourhood Development Orders, change of use from Business Class (B1-B8) or similar sui generis(21) uses will not be permitted unless:

- a. It is demonstrated that the site is no longer required and is unlikely to be re-used or re-developed for industrial/commercial purposes. This should include clear demonstration of marketing, viability appraisal and the suitability of the site to accommodate the proposed use - using a methodology to be agreed by the District Council at pre-application advice stage;
- b. or b. The existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved. The Council will require evidence that the site has not been made deliberately unviable, that marketing has been actively conducted for a reasonable period of time and that alternative employment uses have been fully explored.

There is no evidence to suggest that the applicant has investigated and explored in depth any of the principles adopted within the above policy. Consequently, the application should be withdrawn until these measures have been met.

3.1.2 Furthermore, as already stated above, policy relating to H SP1 and SD SP2, have been totally disregarded especially the spirit of Community engagement for non Strategic Housing Sites such as this proposal:

Policy H SP1 The Housing Requirement Within the plan period 2011 – 2031 at least 20,000 new homes will be accommodated in the District.

Additional non-strategic allocations will be made across the District through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans. On adoption of the Local Plan the Council will assess progress on Neighbourhood Plans and immediately commence the production of a Non-Strategic Site Allocations DPD for those areas of the District which will not be covered by, or committed to the preparation of, an up-to date Neighbourhood Plan.

3.2 Yapton Neighbourhood Plan (YPN)

YPC would reiterate its surprise at the applicant's disregard for YPC's desire to update its NP and indeed the applicant's lack of knowledge at the Parish's current status of this updating process.

In regard of the current made YNP 2014 the following policies are relevant

3.2.1 The site is a departure from the made Yapton Neighbourhood Plan being outside the designated built-up area boundary, policy BB1.

3.2.2 The site fails to reflect the made Yapton Neighbourhood Plan housing policy H1 and is not an allocated site.

3.2.3 The site is currently adjacent to the only remaining employment land in the Parish having lost 3 employment sites to housing over the last 5 years.

Finally, it must be recognised as expressed in a recent appeal (ref APP/D3830/W/16/3165199, Turners Hill, Mid Sussex District Council) the Inspector found that

“the need for housing, even when it is as pressing as it is in Mid Sussex, cannot be a justification for building new homes in the wrong place.”

This land should be for employment and not lost to housing as part of a short-term solution.

3.3 2017 HEELA

3.2.1 The HEELA recognises this plot as employment use and as such to be lost to residential use prior to exhausting all other options across the District seems detrimental to the Parish’s economic well-being.

4. Housing Need

YPC, whilst acknowledging Arun District Council’s need for 1,250 non-strategic residential units, are of the view that on a local level, Yapton has met its short-term local parish allocation. Additional housing mid to long term allocations must be considered through the updated YNP process or any alternative promoted by ADC as stated within policy H SP1. ADC’s recently issued methodology and suggested Parish housing allocations of 26th July 2018 would also seem to support this approach.

The ALP 2011-2031 has designated one small (500 unit) Strategic Housing Sites within Yapton Parish SD7 - Land South of Tack Lee Road and east of Drove Lane. Along with site SD7 a further 450+ residential units have been granted outline planning permission in the Parish of Yapton – an accumulative total of 950+ units.

Yapton’s Community must be allowed to consider and decide how they wish to see their Parish grow as promoted with the newly adopted ALP 2011-2031. This application is premature to this process and consultation. It must be deferred until such time all options for growth within the Parish have been considered in meeting ADC’s non-strategic housing site need.

5. The Proposal

5.1 Layout

The Parish fail to understand how a scheme of this density improves or enhances the setting or the rural nature of this part of historic Yapton. The scheme appears incongruous with its surroundings being elevated and fronting a busy industrial park.

The density of the scheme conflicts with the ribbon development of this historic section of North End’s built environment.

5.2 Transport/Sustainable links

The Parish has concerns regarding the transport solution/access to the proposal.

The increased traffic movements will conflict with both existing traffic flows and regular Primary School parking and traffic. WWCC Highways have highlighted concerns on other proposed housing sites along North End Road in terms of accumulated traffic.

YPC are disappointed that there are no links proposed into adjoining open land to allow a new network of safe sustainable links around the village. These new routes/links will divert pedestrians, cyclists and other users away from the main road network onto a safer and more appropriate village network promoting a healthy environment.

5.3 Social

It is acknowledged that Yapton Primary School is oversubscribed and new classroom space is needed to support any future housing in the village. It is also acknowledged that the medical provision in the village has reached capacity with the most likely solution being a new centre within the Ford Strategic Housing Site.

YPC fail to see how this development can enhance the existing community until these shortfalls are overcome.

5.4 Economic

YPC strongly resist the loss of long term employment land. The only economic benefit of this proposal will be the short development period of the units if granted planning.

5.5 Water Treatment Capacity

Southern Water, in recent nearby applications have stated that they have reservations as to whether there is adequate water treatment capacity for additional housing in the area. Until a proper solution has been put in place by SW YPC would ask that this is fully investigated prior to any decisions being made on this application.

6. Conclusion

Yapton Parish Council is of the view that the Parish has to date contributed positively towards Arun District Council's housing supply on a District level and more than adequately allowed for the Parish's actual immediate local need; significant weight must be placed on the both the economic and Social Benefits this scheme. YPC are of the view that the social benefits are deficient considering the school being at full capacity and medical facilities full. There are no planned improvements to sustainable transport or indeed additional open space to promote healthy living and well-being. The economic benefits are purely short term but with a huge long term negative impact by removing the opportunity of future expansion of Yapton's designated business park area.

In short, the proposal is contrary to the ALP housing and employment policies. The proposal ignores YPC work towards updating its NP and fails to clearly demonstrate the impact of the loss of employment land.

The proposal does not clearly demonstrate a net benefit to the Community. This proposal has both significant social and economic impacts on the community and thus fails to meet the key test of Paragraph 14 NPPF ie a 'Presumption in Favour of Sustainable development' as there are

'.. adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework as a whole;'

We therefore seek planning permission to be refused.