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Henry Adams LLP
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Baffins Lane
Chichester
PO19 1UA

Date: 7th February 2020

Please ask for: Mr S Davis
Tel: 01903 737874

Your Ref:

Our Ref: PAA/142/19/

Dear Sir/Madam,

Pre-Application Advice

Reserved matters applications following outline consents Y/88/18 and Y/44/17
Stakers Farm Land north of Yapton C of E School North End Road Yapton BN18 0DU

I write regarding the above matter and your enquiry received on 10th December 2019.

DESCRIPTION OF PROPOSED DEVELOPMENT

You have submitted a request for pre-application advice in respect of a combined layout for the land approved by outline planning permissions Y/88/18/OUT and Y/44/17/OUT. You initially provided two different option sketch layouts but following our meeting in December where it was agreed by both parties that option A was preferable, you have taken this forwards and have provided us with drawing 19052-2002-DF Rev C "Accommodation Plan". This shows 108 dwellings including six flats, 6 areas of Public Open Space (POS) totalling 7,494m², the land to be gifted to the school (3500m²) and 234 parking spaces.

PLANNING ISSUES

The following issues have been identified for consideration:

Principle;
Design;
Neighbour Amenity;
Amenity Space Provision;
Bin Storage;
Affordable Housing;
Highways, Transport and Parking;
Sustainable Construction;
Open Space Provision;
Light Pollution; and
Biodiversity.

RELEVANT PLANNING HISTORY

Y/88/18/OUT	Outline application with some matters reserved for the erection of 38 No. dwellings. This application affects a Public Right of Way.	App Cond with S106 26-11-19
Y/44/17/OUT	Outline Planning Application for 70 No. residential dwellings including 30% affordable, public open space & associated landscaping. All matters to be reserved apart from Access . This application is a Departure from the Development plan. This application affects the character & appearance of Main Road/Church Road Yapton Conservation Area & the setting of Listed Buildings	App Cond with S106 14-12-18

RELEVANT POLICIES - the following policies are considered relevant to your proposal:

Arun District Local Plan 2011-2031

<u>AHSP2</u>	AH SP2 Affordable Housing
<u>CSP1</u>	C SP1 Countryside
<u>DDM1</u>	D DM1 Aspects of form and design quality
<u>DDM2</u>	D DM2 Internal space standards
<u>DSP1</u>	D SP1 Design
<u>ECCSP1</u>	ECC SP1 Adapting to Climate Change
<u>ECCSP2</u>	ECC SP2 Energy and climate change mitigation
<u>ENVDM4</u>	ENV DM4 Protection of trees
<u>ENVDM5</u>	ENV DM5 Development and biodiversity
<u>ENVSP1</u>	ENV SP1 Natural Environment
<u>GISP1</u>	GI SP1 Green Infrastructure and Development
<u>HDM1</u>	H DM1 Housing mix
<u>HERDM1</u>	HER DM1 Listed Buildings
<u>HERDM3</u>	HER DM3 Conservation Areas
<u>HERSP1</u>	HER SP1 The Historic Environment
<u>HSP1</u>	HSP1 Housing allocation the housing requirement
<u>HWBSP1</u>	HWB SP1 Health and Wellbeing
<u>INFSP1</u>	INF SP1 Infrastructure provision and implementation
<u>LANDM1</u>	LAN DM1 Protection of landscape character
<u>OSRDM1</u>	Protection of open space,outdoor sport,comm& rec facilities
<u>QEDM2</u>	QE DM2 Light pollution
<u>QESP1</u>	QE SP1 Quality of the Environment

<u>SDSP1</u>	SD SP1 Sustainable Development
<u>SDSP1A</u>	SD SP1a Strategic Approach
<u>SDSP2</u>	SD SP2 Built-up Area Boundary
<u>TDM1</u>	T DM1 Sustainable Travel and Public Rights of Way
<u>TSP1</u>	T SP1 Transport and Development
<u>WDM2</u>	W DM2 Flood Risk
<u>WDM3</u>	W DM3 Sustainable Urban Drainage Systems
<u>WMDM1</u>	WM DM1 Waste Management

<u>Yapton neighbourhood plan 2014 Policy BB1</u>	Built-up Area Boundary
<u>Yapton neighbourhood plan 2014 Policy H2</u>	Dwelling size
<u>Yapton neighbourhood plan 2014 Policy H3</u>	Dwellings appropriate for the needs of older people
<u>Yapton neighbourhood plan 2014 Policy SA1</u>	Land north of Yapton CE Primary School
<u>Yapton neighbourhood plan 2014 Policy BE2</u>	High speed broadband
<u>Yapton neighbourhood plan 2014 Policy PK1</u>	Parking standards for new residential development
<u>Yapton neighbourhood plan 2014 Policy E3</u>	Protection of natural habitats
<u>Yapton neighbourhood plan 2014 Policy E4</u>	Minimising the environmental impact of development
<u>Yapton neighbourhood plan 2014 Policy E5</u>	Enhancement of biodiversity
<u>Yapton neighbourhood plan 2014 Policy E6</u>	Green infrastructure and development
<u>Yapton neighbourhood plan 2014 Policy E8</u>	Conservation Areas
<u>Yapton neighbourhood plan 2014 Policy E9</u>	Listed Buildings and Buildings or Structures of Character
<u>Yapton neighbourhood plan 2014 Policy E11</u>	Minimising the impact of flooding from development

Planning Policy Guidance:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

Supplementary Guidance:

SPD1	Open Space & Recreation Standards
SPD2	Conservation Areas
SPD3	Parking Standards

PRINCIPLE

The principle of development has already been established by the outline permissions granted under Y/44/17/OUT and Y/88/18/OUT which gave permission for 70 + 38 dwellings and agreed the site access from North End Road.

DESIGN

Policy D DM1 of the Arun Local Plan (ALP) requires that the Council seek to make the best possible

use of the available land by reflecting or improving upon the character of the site and the surrounding area. It also requires the Council to consider scale, massing, aspect, siting, layout, density, building materials, landscaping, and design features. It is also necessary that development demonstrates a high standard of architectural principles, use of building materials and hard and soft landscaping to reflect the local area.

In terms of density, D DM1 requires that new housing makes efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. However, higher densities will be more appropriate in the most accessible locations. The policy also requires that the scale of development keep within the general confines of the overall character of a locality.

ALP policy D SP1 states 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. With major developments or allocated sites in the Development Plan, in addition to a Design and Access Statement, a context appraisal, context plan and analysis of the site will also be required".

ALP policy LAN DM1 states that: "Development throughout the plan area should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas. The historic character and development pattern of settlements within the District should be respected, taking into account their distinct identity and setting".

There are no design policies in the Yapton Neighbourhood Development Plan (YNDP) but regard would also be had to the NPPF (particularly paragraphs 122, 127, 130), the National Design Guide and also the Council's emerging Design Guide. The latter is currently out for consultation (09/01/20 to 21/02/20) but may have been adopted by the time of the reserved matters application. It can be viewed on this webpage: <https://www.arun.gov.uk/supplementary-planning-documents-spds>. You should include a statement with your planning submission setting how the scheme respond to all of these policies and guidance documents.

As stated at our meeting, our preference was for Concept Scheme A and it is this that you have taken forwards with a more detailed layout and which I now refer to. However, please note that I spoke with our Group Head of Planning following our meeting (and showed him 19052-1505 Rev B) and his comments were that:

- Overall the layout seems too dense (although we accept that you have permission for 108 dwellings and these must be balanced against our other requirements & the gifted land);
- The parking court area to the rear of plots 72-76 is not an appropriate solution. However, I see on the latest layout that this has been altered in scale & layout. Also, I note that our emerging Design Guide does not rule out the use of parking courts instead stating that: "Rear parking courts should only be provided if all other options are exhausted, and should be small scale and overlooked by housing to ensure safety and crime prevention" (page 77); and
- The North End Road frontage needs a clear frontage. Flint would be appropriate on the boundary walls to this frontage.

I would also ask that you consider carefully the Landscape Officers response as set out elsewhere in this letter. I endorse the comments made regarding:

- Provision of a pedestrian/cycle path through the scheme from the southern border with the private track to the boundary with Clays Farm;

- Removal of one of the pathways across POS A to create a larger green area;
- Changes to the western buffer planted area to prevent a fenced corridor formation; and
- Provision of a footpath through parts or all of this buffer planting (this would then allow it to be considered as useable POS).

Overall, I consider the layout to be broadly acceptable but that a few changes are needed prior to submission. I would be happy to provide further comments by email on subsequent drawings or we could arrange a further meeting, potentially also with the Landscape Officer, to discuss revisions.

NEIGHBOUR AMENITY

ALP policy D DM1 requires that the Council have regard to certain aspects when considering new development including: (3) Impact - "Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance." ALP policy QE SP1 is also relevant: "The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

We would also have regard to the NPPF (paragraph 127), the National Design Guide and the Council's emerging Design Guide. The latter includes guidance and criteria on several things including distances between dwellings, garden sizes, boundary treatments, defensible space, protection/provision of sunlight & daylight and internal space standards.

I have not assessed the scheme against all of the applicable standards/criteria and you should instead satisfy yourselves that the scheme is broadly in accordance with these.

AMENITY SPACE PROVISION

ALP policy D DM1 refers to the need for compliance with the Arun Design Guide. As set out above this is an emerging document but may have been adopted by the time of the reserved matters application. This sets out the following requirements:

- Private Rear Garden: min. 10.5m depth, 50sqm area for two-bedroom homes and 60sqm area for three or more bedroom homes (smaller gardens with adequate daylight and privacy may be acceptable in corner plots);
- Private Front Garden: min. 2m depth which will act as a defensible zone and privacy strip;
- Balconies: max. 2m beyond the building frontage, subject to minimum balcony to balcony distances of 17m. At least 3sqm of useable space; and
- Communal Shared Spaces for flats: minimum 40sqm plus 10sqm for each unit if not provided as balcony space.

I have not assessed the scheme against all of the applicable standards/criteria and you should instead satisfy yourselves that the scheme is broadly in accordance with these. Please also provide a schedule of garden sizes and depths with your planning application.

BIN STORAGE

For all new residential development including flat conversions, the applicant must show bin storage/collection provision as follows:-

Each unit should be provided with the equivalent of 240 litres of residual waste storage/bins. For flats, the communal/bulk bins can be used on the basis of 240 litres of residual waste storage/bin per flat. Alternatively one 240 litre wheelie bin for each property can be provided.

The same amount of storage space/bins for recyclable materials is required to be provided.

Where bin stores are adjacent to the access road serving the development or across a parking area there will need to be a road up to full highway standards and an indemnity provided for the Council's

contractors to pass across servicing. The access of this type provided must be accessible/passable for collection schedules i.e. no parking or other obstruction.

The maximum pulling distances allowed under Health and Safety legislation are 10 metres for 1100 litre bins and 50 meters for 240 litre bins.

It is recommended that if any communal provision is located near or adjacent to the highway, it will be suitably enclosed and landscaped so that the maximum pulling distances and vehicle access requirements are complied with. You may also need to show a bin collection point if any flatted buildings are proposed at or near the highway boundary.

Please also note that ALP policy WM DM1 states that:

"New residential development, will be permitted provided that:

- a. It is designed to ensure that kerbside collection is possible for municipal waste vehicles
- b. Where appropriate, communal recycling bins and safe bin storage areas are available to residents of flats."

The proposal is likely to be acceptable subject to compliance with the above.

AFFORDABLE HOUSING

The two respective outline permission set out a requirement for 11 and 21 (32 total) affordable housing units. The Councils Housing Strategy and Enabling Manager stated on 08/01/20 that he was happy with the accommodation schedule as proposed (that received on 19/12/20).

HIGHWAYS TRANSPORT AND PARKING

ALP policy T SP1 seeks to ensure that development: provides safe access on to the highway network; contributes to highway improvements & promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network.

In respect of parking, it states that: "The Council will support transport and development which: Incorporates appropriate levels of parking in line with West Sussex County Council guidance on parking provision and the forthcoming Arun Design Guide taking into consideration the impact of development upon on-street parking"

In respect of road layout, it states that: "The Council will support transport and development which: Explains how the development has been designed to: (i) accommodate the efficient delivery of goods and supplies; (ii) give priority to pedestrian and cycle movements and have access to high quality public transport facilities; (iii) create safe and secure layouts for traffic, cyclists and pedestrians whilst avoiding street clutter."

The Council has recently adopted a new Parking Standards Supplementary Planning Document. According to this, the parking requirement associated with the proposal as shown on drawing 19052-2002-DF Rev C would be: 271 spaces.

This is based on the following factors:

- Zone 1 Location;
- 2 spaces for 1-3 bed dwellings, 3 spaces for 4+ bed dwellings; and
- Additional visitor parking of 20% of total.

Please also note that all garages, if measuring at least 6m x 3m internally, will only qualify as 0.5 of a space. Car ports/barns however are counted as 1 space. Your proposal does represent a significant shortfall against the new parking standards (and potentially more so if garages are shown as I have not

assessed the presence of such).

I am not able to consult with West Sussex County Council on pre-application enquiries and so I am unable to provide any comments on the highway aspects of the layout. However, you can if you wish contact them yourselves for pre-application advice:

http://www.westsussex.gov.uk/living/roads_and_transport/roads_and_footways/development_control_plans_and/development_control_for_roads/pre-application_advice_for_roa.aspx

Although it is acknowledged that access has already been approved, we will still require advice from WSCC Highways as to the road layout and this will inform our decision making on the reserved matters submission.

I am unable to currently say for sure as to whether the proposal will be acceptable or not as this will depend on West Sussex Highways advice in respect of the layout however, the parking shortfall is likely to be a significant concern going forwards and you should note that our Development Control Committee are very keen to see the standards enforced.

SUSTAINABLE CONSTRUCTION

Tackling climatic change is a key government priority for the planning system. Applicants for planning permission should consider how well their proposals for development contribute to the Governments ambition of a low carbon economy and how well adapted they are for expected effects of climatic change. Applicants should consider provision of renewable energy in the form of high level insulation, rainwater harvesting and general minimal energy use, including Carbon Dioxide reduction.

ALP policy ECC SP2 "Energy and Climate Change Mitigation" states that:

"All new residential and commercial development (including conversions, extensions and changes of use) will be expected to be energy efficient and to demonstrate how they will:

- a. Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;
- b. Use design and layout to promote energy efficiency; and
- c. Incorporate decentralised, renewable and low carbon energy supply systems, for example small scale renewable energy systems such as solar panels.

All major developments must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable. Energy efficiency measures will be taken into consideration when the total predicted energy requirements are calculated. The Council will consider 'allowable solutions' where it is clearly demonstrated that the provision of on site renewable or low carbon energy generation is unviable or not feasible."

And that:

"In assessing the achievement of these standards the Council will consider:

- * Site constraints;
- * Technical viability;
- * Financial viability; and
- * Delivery of additional benefits."

It is noted that condition 19 of Y/88/18/OUT and 25 of Y/44/17/OUT require the submission of a scheme and this will need to be provided separately to the reserved matters submission. However, please note that notwithstanding the wording of the conditions, we will accept a fabric-first approach if this is demonstrated to achieve an equivalent energy saving.

OPEN SPACE PROVISION

ALP policy OSR DM1(2a) says: "housing will be required to contribute towards open space provision in accordance with guidance set out in the current Open Space Study. In some parts of the district open space provision is identified as being sufficient in terms of quantity. Therefore, provision of new open space is not deemed necessary but what is needed is to seek contributions for quality improvements and/or new off-site provision to address any future demand."

The Council has recently adopted a new "Open Space, Playing Pitches, Indoor and Built Sports Facilities" Supplementary Planning Document. This sets out a requirement for the scheme (the two sites together) to provide a total of 7,603m² of Public Open Space. Notwithstanding, it was agreed at outline stage that the POS should be 2675m² for the land north of the school and 4000m² for Stakers Farm. The latter was reduced from the required amount of 5,376m² to take account of the land to be gifted to the school. The total requirement at outline stage was therefore 6675m² and this is 928m² less than that in our new SPD.

Your proposal is for 7,494m² of POS which would comply with both the previous and current requirements. However, I note that this total includes the buffer planting areas on the western boundary which are shown to have 1569m² worth of space. Our requirement is that all public open space should be useable therefore, we would only allow these buffer areas to be included if there was public access into and through them (i.e. by a footpath).

The SPD also provides updated requirements in respect of play space, however the provision of play space was agreed at the outline stage and therefore providing that you provide a LEAP on the Stakers Farm site and a LAP on the land North of the School, there will be no objection in terms of play provision. The current plan does not show the location of the play areas and will need to do so at Reserved Matters application stage. Careful consideration will be required as to the siting of the play features to ensure that they are safe and appropriately located. The LAP and LEAP need to be located at least 20 metres from nearby housing.

The proposal is likely to be acceptable and in accordance with policy OSR DM1 provided that the amount of POS is more than 6,675m² and that it is demonstrated to be all useable space.

BIODIVERSITY

Please note that ALP policy ENV DM5 requires that development schemes seek to achieve a net gain in biodiversity. Please provide a statement with the application to demonstrate that this is will be achieved.

OTHER CONSIDERATIONS

HERITAGE ADVICE:

The Council's Conservation Officer has made the following comments:

"The concept of development has already been considered in this location, and I do not revisit this as part of my response. There are a number of heritage assets in the local area, including:

(a) Listed Buildings: Stakers Farm and barns; The Homestead, including attached outbuildings; and Yew Tree House. (b) Locally Listed Buildings: Hawthorn House; and Lilac Cottages.

Information has been provided which helps to give an impression of the proposed development, and I provide the following comments.

Two options have been provided, as well as a sketch scheme. It is considered that concept sketch A is preferred; the location of the southern area of open space is supported as it provides a buffer to the nearest heritage assets. It is suggested that maybe further landscaping proposals such as additional trees etc could be planted to soften the transition area between Stakers Farm and the built form of the

site.

The general palette of materials proposed appears to be acceptable. The ultimate success of such a scheme will depend upon the quality of these materials and the way in which they are applied. i.e. using a traditional brick bond on public facing elevations, and well-constructed flint panels.

The acknowledgement that weatherboarding is not common to the area is positive. It is therefore suggested that its use is severely limited, potentially to those elevations that are not public facing, or on secondary structures such as garages etc.

The use of white painted brick is acceptable, subject to the use of a traditional shade of white, and appropriate bricks being used. It is considered that if a more standard brick is used, the effect intended to be created is lost.

The architectural features which were identified seem to be suitable for a scheme such as this. They should be of a scale/appearance similar to those found in the local area.

It is suggested that in order to provide a true character area within the village, that a range of property types are provided, as opposed to a very limited number which are repeated throughout the development.

A heritage statement will be required in order to assess the impact of the development on the heritage assets."

HOUSING MIX

ALP policy HDM1 provides for a mix of housing to meet local needs and requires that all housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand. It is important to highlight that the policy 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 policy preamble (12.2.4) continues to acknowledge that the final mix will be negotiated on a site by site basis, having regard to the most up to date Strategic Housing Market Assessment (SHMA).

The 2012 SHMA was the subject of an update by GL Hearn in 2016 ("Updated Housing Needs Evidence", September 2016) in which paragraph 6.3 stated that the evidence highlighted a direction towards the provision of 2 and 3 bed units for market units and smaller affordable units. The 2016 update acknowledges at paragraph 6.10 that the analysis clearly shows the different profiles in the different broad tenures with affordable (rented) need being more heavily skewed towards smaller dwellings and market housing predominantly homes with three or more dwellings. Table 29 identifies a suggested broad mix housing by size and tenure for the District.

The proposed development (as per 19052-2002-DF Rev C) comprises the following housing mix:

- 6 x 1 bed dwellings;
- 30 x 2-bed dwellings;
- 62 x 3-bed dwellings;
- 10 x 4-bed dwellings.

YNDP policy H2 says: "developments of fifteen or more dwellings must provide a mix of dwelling sizes (market and affordable) that fall within the following ranges:

- 1-bed dwellings: 10-15% of all dwellings (so 10.8-16.2);
- 2-bed dwellings: 25-35% of all dwellings (so 27-37.8);
- 3-bed dwellings: 45-55% of all dwellings (so 48.6-59.4); and

- 4+ bed dwellings: 5-10% of all dwellings (so 5.4-10.8).

The number of 2-bed dwellings and 4 bed dwellings are in the range set out by YNDP policy H2 and although the number of 3 beds is slightly higher, this is not a significant difference. The number of 1 bed units may however be considered a little low to demonstrate compliance.

Alternatively, if the housing mix remains the same in the reserved matters application, then the applicant will need to provide a robust case to justify why the proposed housing mix should be developed on the site in conflict with YNDP policy H2.

The proposed layout comprises detached, semi-detached, link-detached, terraced houses and some flats which provide for variety not only in housing size but type. The overall market and affordable mix provides for a range of dwelling sizes from 1, 2, 3 and 4 bed houses. The proposed development delivers over half of the overall scheme as 2 and 3 bed dwellings and this is consistent with the objectives of the SHMA in providing a focus on family housing across a range of housing sizes and types whilst also providing a proportion of smaller 1 bed units overall. However, the proportions of 1 and 4 bed dwellings may not meet the suggested mix in the SHMA.

The respective Section 106 Agreements both set out a particular housing mix however, in all relevant parts of the two 106's, this is stated to not be binding on the future development. Therefore, we will not accept an argument that the mix must be in accordance with that shown in the Section 106. We will however attach significant weight to the views of Yapton Parish Council should their view be different to that of their policy H2.

Please also note that YNDP policy H3 requires that 25% of all 1, 2 & 3 bed dwellings included as part of the development to be delivered to Lifetime Home standards (or the equivalent current standard).

INTERNAL SPACE STANDARDS:

ALP policy D DM2 states that: "The planning authority will require internal spaces to be an appropriate size (having regard to the exceptions that may apply as referred to in paragraph 13.3.4) to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance."

We have been using these standards for some time for development management purposes and these have been subject to testing on appeal. Our position in respect of these has now been strengthened by the adoption of the Local Plan. Please ensure that your future submission takes account of the above guidance and please provide a schedule together with your application to demonstrate compliance.

LANDSCAPE COMMENTS

The Council's Landscape Officer made the following comments (in response to 19052-1505 Rev B "Sketch Scheme based on Concept Drawing A"):

"Response

Good to see that both options Concept sketch A and Concept sketch B have indicated good areas of POS in usable blocks rather than fragmented areas. Pathways within the development and their connection to PRoWs should be further considered and established. We would want to see a pedestrian/cycle-way connection to both developments of Clays Farm to the north/east and Bonhams Farm to the south. A link presently shown terminating between plots 71 and 72 should continue to allow this connection.

The configuration of pathways shown across the northerly greenspace, could possibly be improved by removing one of the pathways, still allowing a connection to the PRoW but whilst maintaining a large open POS area.

A green boundary treatment along the western boundary has been shown to both designs with a wider area to Concept B design. I would raise concern that this area should be given serious design thought so as not to allow it to form just an inaccessible corridor which is shown to be flanked on one edge with dwelling boundary fences. This area would benefit from a widening to allow for planting and also a footpath link. Consideration of the orientation of plots 51, 60, 61, 68 section presently shown side facing this boundary edge, if turned west facing would open up this view and prevent the fenced corridor formation.

All greenspaces should be considered and valued and their connection for biodiversity and habitat explored. A robust and comprehensive planting scheme will need to be developed which includes a mix of evergreen and deciduous, native and ornamentals. Tree specification should be at a size which allows instant impact, but which will establish and mature as the site develops.

Recommendation

I would recommend no objection on landscape grounds, subject to the considerations and confirmations above."

DRAINAGE ENGINEERS COMMENTS

The Council's Drainage Engineers have made the following comments:

"No objections. Revised details required at discharge of conditions stage. I note that the outline decision notice has pre-commencement conditions regarding surface water drainage. The applicant's drainage engineer has been in contact with this department to discuss and agree their infiltration testing and groundwater monitoring, and there is confidence that an infiltrating solution will be found. My comments below are advice on the formal proposals submitted to date which would require addressing when a formal discharge of conditions application is submitted.

- Hierarchy for sustainable drainage must be followed. Infiltration testing and groundwater monitoring must be completed.
- Ordinary watercourse land drainage consent will be required for any proposals to discharge to ordinary watercourse.
- Outflow should be restricted to greenfield 1 year or 2l/s, whichever is the greater. Any proposals to discharge at rates lower than this are unlikely to be acceptable due to the risk of blockage.
- Full calculations, layouts and detail drawings will need to be provided in accordance with our checklist that can be found here <https://www.arun.gov.uk/drainagechecklist>"

CONCLUSION

Based on the above comments, I conclude that were an application for planning permission to be submitted then subject to clarification of the foot/cycle access through the site, clarification of the useable areas of POS, changes to the housing mix (or agreement to yours by the Parish), an increase in the number of parking spaces and subject to a more thorough assessment of detailed matters and design elements, that it may be possible to support the application. However, at the current time, it is not possible to give any guarantee to such a recommendation.

There have been some questions raised which required further consideration. I believe I have answered the question about housing mix elsewhere in this letter and so this leaves the following points:

- (1) To question internally whether this a particular stance taken as to how electric charging for flats and parking courts is to be addressed; and
- (2) To confirm suitable management approach for the landscape buffer.

In respect of (1), I would have to refer you to our Parking Standards SPD and also page 80 of our

emerging Design Guide. The requirements are clear that until 2023, 20% of parking spaces for flats or houses without driveway & garage) must be provided with a charging point. I would suggest that in such situations, these would be best provided in unallocated or shared visitor spaces. In respect of (2), please note the response of our landscape officer as set out elsewhere in this letter and should you have follow-up questions then I would be happy to liaise with her and report back.

Should you require a further meeting then please note that a further fee of £200 will be payable.

FOLLOW UP MEETING

Your pre application advice fee included a meeting and this was held on the 18th December 2019. You have sent me the minutes that you took of this meeting and I have pasted these below. I hereby also agree that they reflect what I advised and recall being discussed at the meeting:

"Attendees: Simon Davis - Principal Planning Officer Arun DC (SD); Andrew Robbins - Dandara Ltd (AR); Chris Harrison - Dandara Ltd (CH); James Pugh - Dandara Ltd (JP); Richard Summers - Boyle and Summers (RS); and Ellie White - Henry Adams LLP (EW).

Item 1: Introductions

CH - provided background to Dandara, other schemes within the District, reason behind the pre-application submission.

Item 2: Design Brief

Story behind design

RS - ran through context plan and developments to the north and south of the site to demonstrate that actually countryside would only abut one side of the site if these sites come to fruition.

RS - ran through site specific opportunities and constraints; existing tree planting on the western boundary, outline proposes bolstering and RS envisages this to be something characteristic of the location that allows visibility beyond as opposed to a thick screen, proximity to Conservation Area, proximity to The Croft, area of land to be gifted to the school but proposed use unknown. The site is relatively flat.

CH - confirms a natural slope which allows for drainage.

JP - confirmed that the site is relatively unconstrained.

RS - ran through each outline consent, comments made on the long run of housing on the western boundary which would result in the feel of the site being enclosed and insular, it does not relate well to the countryside and was most likely drawn as a proving exercise.

SD - confirmed that on the southern outline, the council prefer the location of the open space as it considers the setting of the listed buildings and also provides a buffer for the residents of The Croft. On the northern site, they prefer the open space to be located centrally as previously drawn. Confirmed that the open space needs to be usable, and each area is usable as proposed in the outline illustrations.

RS - ran through the concept plans. Confirmed that concept A was preferred by Dandara.

SD - confirmed also preferred by the Council, the POS shapes and locations were preferred.

RS - tabled more detailed design of Concept A. Outlined key features including; streets coming off the main avenue to break up the western boundary and ensure the proposal better relates to the countryside beyond, Footpath 329 3m cycle/pedestrian path remains the same, Footpath 326 which currently cuts diagonally across the field now shares part of 329 then splits at the open space towards the North West Corner of the site, proposal allows for pockets of landscaping rather than a tree lined boulevard, it tries to create a green, 'villagery' feel.

CH - discussed the need to provide feature properties at the entrance points.

SD - confirmed this would be beneficial and confirmed he understood and generally agreed with the design concepts outlined by RS.

RS - discussed potential for shared surfaces with footpaths being flush with the highway and

pedestrians having priority.

Landscaping and ecology

Relevant points covered under other headings; design brief, drainage, AOB.

Mix

JP - raised the conflict with S106 and conditioned mix. Confirmed that affordable mix would be adhered too however, market mix will be a variation on both. Reasoning for this is due to the S106 mix not adhering to mix outlined within the Yapton Neighbourhood Plan. The proposed mix seeks to provide a middle ground.

SD - confirmed that if Parish were in agreement then it's likely the district would be.

JP - to provide accommodation schedule for Simon to confirm suitable.

Location of affordable

CH - confirmed location on tabled plan, proposed in two clusters on each scheme.

SD - confirmed small clusters were preferred.

RS - to update plan showing location of affordable now agreed.

Materials

RS - discussed submitted montage and confirmed narrow pallet of materials to include red brick base with painted brick, flint and tile hang.

SD - confirmed requirement to consider National and Local Design Guides.

CH - identified feature properties

Connectivity with adjoining sites

RS - confirmed connections to the north wherever appropriate as the outline scheme has not been approved, and south to meet with location on Seawards proposal.

Item 3: Footpaths - diversion

SD - confirmed there was previously a response from PROW officer re. diversion and it would be best to liaise with them directly.

Item 4: Technical Matters

Access

CH - questioned the potential to submit a new application for access only as soon as possible. This would have a number of benefits including but not limited to; ability to start on site as soon as possible following RM consent, the ability to move construction traffic out of the road during periods of on-site survey work and construction, could also allow for suitable wheel washing facility and thus minimise any disruption locally. Confirmed that the access and road will be designed to adoptable standards but would not be formally adopted due to drainage strategy.

JP - stated proposed documents for submission; transport statement/technical note, ecology surveys, heritage statement, drainage details, planning statement/summary of reasoning for application, site location plan, block plan, technical drawings.

SD - to confirm.

JP - queried timescales for decision.

SD - confirmed an application for access would take 8 weeks minimum to determine. It may be SD dealing with this or a less senior officer if the principle can be easily agreed. Recommends submitting second week in January.

Parking requirements

EW - queried whether it was the case that a garage was considered as 0.5 space or whether it was possible to provide a larger garage to allow for storage and parking of a vehicle for it to count as a space.

SD - confirmed SPD stated 0.5 spaces so this is the Council's stance.

Electric Charging Points

CH - requested confirmation that it would be a charging point for each garage but queried how this would be addressed for flats and how many should be provided.

EW - confirmed that SPD confirms this re. garages and 20% of all other spaces to be provided with electric charging points.

SD - confirmed as set out in the SPD.

CH - questioned how this would be managed, who would get the charging point spaces, how would this be managed for flats.

RS - noted other schemes where spaces for houses are allocated but spaces for flats are unallocated.

SD - confirmed it is not clear how charging points for flats should be accommodated, may be for Dandara to propose solution. SD to question internally.

Drainage

JP - confirmed strategy ground water monitoring and drainage strategy had previously been agreed with Laura Gibbons

SD - questioned whether soakaways would be incorporated into open space as this would have benefits in terms of biodiversity.

JP - confirmed drainage is being dealt with via crates and porous paving and thus use of the open space is not required for this purpose.

Item 5: Conditions

Not discussed specifically but relevant conditions where further clarity has been needed has been discussed throughout the meeting.

Item 6: Consultation

SD - not yet consulted as main consultation would be with landscape/greenspace officer and Conservation Officer but submitted plans did not provide sufficient information to do this.

CH - consultation response from Highways?

SD - WSCC would need to be consulted directly.

EW - queried timing for responses if an updated plan is provided, considering the Christmas period.

SD - confirmed it would usually be 21 days (plus 3 bank holidays) but may take slightly longer due to the office closure. If Dandara are to provide the plan by Friday (20th) then it can be issued for consultation prior to Christmas.

JP - requested consultation with housing due to the variation in the market mix.

SD - confirmed consultation with strategic team/ housing and enabling officer.

EW - outlined Dandara consultation strategy; to arrange a meeting with the Parish Council in the New Year, attend the Yapton Advisory Group meeting in January if necessary, liaison with the school to provide an update prior to formal submission.

SD - Yapton Advisory Group Meeting planned for 16th January. Confirmed liaison with the Parish is key and would agree with approaching direct prior to submission. Rear of the school is a Neighbourhood Plan allocation and there were few local objections relating to Stakers Farm; wouldn't consider formal public consultation or consultation with the school necessary.

CH - liaison with the school is proposed as they are a neighbour.

Item 7: Timescales for submission

JP - confirmed access application to be submitted as soon as possible in the new year.

Item 8: AOB

Landscape Buffer

JP - 4.5 metre buffer is required along the western edge of the Stakers Farm application, in line with the Ecology and Landscape Masterplan Strategy (LLD1136/01). Questioned how the Council envisage this being maintained and what it should consist of to allow for this.

SD - would envisage this being sporadic planting so access could be obtained for management.

CH - confirmed other schemes such as Littlehampton involved management by a management company in public areas whilst buffer to the rear of private gardens to form part of garden to be maintained by occupier.

JP - confirmed this could be addressed by covenant and the buffer retained in perpetuity.

SD - confirmed this could be possible if agreed on the Littlehampton site. SD to check and confirm.

JP - questioned whether the buffer could be classed as open space.

SD - confirmed no.

Biodiversity

EW - questioned whether there is any reason for the landscape buffer around the school other than for ecological enhancement.

SD - confirmed no other reason and confirmed location on the western boundary of the school only, and only within the Stakers Farm site. 2m buffer is not required along the north edge abutting the 3m wide footpath.

CH - confirmed that this would be extended to the entire length of the western boundary into the land rear of the school for continuity.

SD - confirmed agreement.

Action Points:

Simon Davis

- To confirm documents for submission of access application.
- To question internally whether this a particular stance taken as to how electric charging for flats and parking courts is to be addressed.
- To confirm suitable management approach for the landscape buffer.
- To consult with landscape, conservation and strategic team once updated plan has been received.

Dandara

- To submit winter monitoring/BRE 365 details to Paul Cann and obtain confirmation on drainage strategy.
- To send proposed mix to SD.
- To liaise with PROW officer.
- To submit pre-application to WSCC if felt necessary.
- To send an updated plan to SD so he can issue for consultation, to be issued by Friday 20th Dec."

MAKING AN APPLICATION

If you decide to proceed with making an application you will need to quote the reference number for this advice in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

You will need to submit the following documentation/information with your application to meet the National Validation Requirements:

Fully completed and signed Application Form with full description of the proposal;
Ownership Certificate and Agricultural Land Declaration;
Design and Access Statement;
Correct Fee;
Location Plan (1:1250);
Site / Block Plans (1:500);
Elevations (Proposed);
Floor Plans (Proposed); and
Roof Plans.

Please note that the Council has a Local Validation Requirements List and you should refer to it before submitting your application. Failure to provide the required documentation and to complete the Validation Checklist will result in the application being treated as incomplete and delay the validation of the planning application.

Having looked through the Local Validation Requirements List, I would suggest that the following additional documents will be required:

Topographical Survey plus Existing and Proposed sections and finished floor and site levels;
Street Scenes;
Parking Plan;
Affordable Housing Statement;
Biodiversity Survey and Report;
Surface Water Drainage Statement;
Lidsey Foul Water Environmental Assessment Statement;
Heritage Statement;
Tree Survey and Arboricultural Report; and
Landscaping Strategy.

For more details see here:

<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n14878.pdf&ver=15275>

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case Officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the Case Officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request. Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations or ordinary watercourse consents. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours faithfully

Neil Crowther

A handwritten signature in black ink, consisting of stylized, cursive letters that appear to be 'NC' followed by a small dot.

Group Head of Planning