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25th July 2018

Our Ref: 32659

Your Ref: Y/91/17/OUT

Dear David

Land at Bilsham Road, Yapton

On behalf of our client Gleeson Strategic Land ("the Applicant") please find enclosed supplementary/ updated illustrative information in response to comments received from Arun District Council ("ADC") and consultees on the above application. Consideration has been had to the meeting held on 20th June 2018 and those responses received during the presentation to the Yapton Advisory Committee on 13th July 2018. As agreed this information is submitted in time to allow the Council time to re-consult (if necessary) ahead of taking the planning application to committee in September.

The following supplemented/updated illustrated information is enclosed:

- Updated illustrative Masterplan;
- updated Design and Access Statement;
- updated Arboricultural Impact Assessment;
- Preliminary Arboricultural Method Statement;
- Ecological Technical Note; and
- Green Infrastructure Statement.

The primary elements of this updated information are as follows:

- Clarification of the road hierarchy across the site with the link road being a 'residential spine road' of no more than 5.5m width;
- further explanation of character areas;

London

Birmingham

Manchester

Thames Valley

- clarification of density ranges;
- supporting Green Infrastructure strategy;
- provision of a central open space/ focal point within the wider allocation and removing part of the central hedge; and
- potential houses re-orientated to directly overlook the PROW located centrally within the allocation, and to the north west of the planning application site.

The updated Design and Access Statement provides further detail on Yapton's character and sets out the evidence behind the design rationale. The Design and Access Statement takes into account the allocation SD7 and then focuses specifically on Land at Bilsham Road, Yapton.

The Arboricultural Impact Assessment and Preliminary Arboricultural Method Statement are being submitted in response to comments made by the Council's arboriculturist. These comments have been discussed at length with Mark Warwick and therefore it is considered that this is now resolved.

The Ecological Technical note has been produced to demonstrate that the loss of 80m of the central hedge can be compensated for and a net gain can still be achieved on site.

Compliance with Policies H SP2 and H SP2c

On 18th July 2018, the Council formally adopted the Arun Local Plan 2011-2031. Of particular relevance are Policies H SP2 and H SP2c. We set out in the attached note the compliance of the proposal with these policies insofar as it is appropriate and relevant for an outline application. It is clear from the note that the planning application is policy compliant.

Context Appraisal

As part of the updated Design and Access Statement, consideration has been given to Policy D SP1 which states that:

"...development proposals should have been derived from: a thorough site analysis and context appraisal..."

The context appraisal (from page 8 of the revised DAS) demonstrates how the village of Yapton has been considered and has formed the basis for the design of the site.

Infrastructure Contributions

This section provides an update as to where we are in relation to infrastructure contributions relevant to the application.

Early Years

The Applicant is willing to accept the requested contribution £329,786 to meet the needs of nursery places required from the development. We are currently seeking confirmation that this financial contribution will be linked to the expansion of Yapton Primary School or an alternative suitable location. The formal response from WSCC has not yet been received and we would welcome this information at the earliest opportunity.

Primary Education

The Applicant is now close to agreeing the financial contribution relevant to the expansion of Yapton Primary School and is working closely with WSCC to resolve the position.

Secondary Education

In September 2017, the School Provision in Arun District: Update prepared by WSCC confirmed that the Ormiston Academy does have capacity. We are still waiting for evidence from WSCC to support their assertion that the secondary school is at capacity. In order for WSCC to justify their assertion that there is no secondary school (ages 11- 18) capacity within the Barnham/Westergate area, it must confirm which of the developments are included within the pupil forecasting submissions.

Sussex Police

The Applicant has liaised directly with Sussex Police and we agree to the financial contribution requested of £30,512.66.

Leisure Contributions

Following your letter dated 10th July, we are waiting for revised contributions for leisure. The current position is set out in the table below but we welcome further confirmation from the Council. We would also require information on exactly what schemes these contribution will be going towards as this has not yet been provided.

Open Space

The updated DAS sets out the open space provision across the application site. The Applicant is waiting for the Council to confirm whether an off-site contribution to a MUGA is required and where this will be located.

Highways

The Applicants Transport Consultant Odyssey have responded to WSCC Highways setting out our offer for financial contributions based on available evidence. We have requested a meeting to discuss the contributions and have for clarity set these out in the table below.

NHS CCG

The Applicant has received a request for £273,965 from the Coastal West Sussex Clinical Commissioning Group (NHS). This contribution will be towards the 'Croft Surgery' for the infrastructure needs of managing 'Treatment Rooms' capacity/ the strategic hub for Arun. We understand ADC are in further discussions with the NHS and therefore we would welcome an update.

Library

The Applicant has not received any request for a financial contribution from WSCC for libraries.

The table below outlines the position of the S106 contributions that have been put forward by the Applicant to date.

Infrastructure	Contribution	Comments
Early Years Education	£329,786	Financial contribution
Primary Education	TBC	1.5 form entry expansion of Yapton C of E Primary School
Secondary Education	TBC	
Sussex Police	£30,512.66	<u>Yapton NPT</u> Officer start up equipment cost - £2,670.54 Officer start up recruitment and training - £3,385.20 Fleet - £14,218.52 <u>Bognor Regis</u> Staff start up equipment cost - £834.40 Staff start up recruitment and training - £424 Premises cost - £14,218.52 <u>ANPR</u> B2233 Barnham Road - £405
Leisure	£246,251	Sports Hall - £110,935 Swimming Pools - £121,770 3G Pitches - £16,546 Figures to be confirmed – awaiting confirmation from the Council.
Highways	£773,625	<u>Strategic Improvements</u> Oystercatcher - £454,545

	Figures to be confirmed.	Proportional contribution towards full delivery of WSCC Preferred Roundabout scheme. Comet Corner - £292,080 Proportional contribution towards full delivery of proposed improvement scheme in lieu of any other details. <u>Location Improvements within Yapton</u> c.x4 Uncontrolled Crossings along B2132 Bilsham Road - £20,000 <u>Yapton to Barnham Cycle Link (Section 38 from WSCC Walking and Cycling Strategy)</u> Contribution towards WSCC improvement scheme – c.£7,000
Coastal West Sussex Clinical Commissioning Group (NHS)	£273,965	Contribution to The Croft Practice
Sports Pitches	£150,503	For whole SD7 allocation – cost to be confirmed
Play provision		Awaiting confirmation from the Green Space team as to their preferred option

We consider that this submission responds fully and appropriately to the comments from Arun District Council and the responses received at the Yapton Advisory Committee. As agreed we understand that this provides time for the Council to re-consult (if necessary) and report the application to the September Committee with a recommendation for approval.

If you require any clarification or have further questions on any of the above please do not hesitate to contact either myself or Adam Ross.

Yours sincerely,

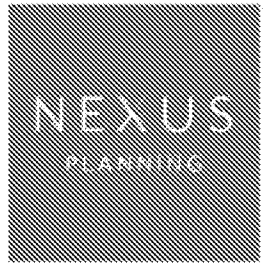


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cc Peter Rawlinson – Gleeson Strategic Land
Adam Ross – Nexus Planning



Note on compliance with Policy H SP2 / H SP2C of the adopted Arun Local Plan 2011-2031

Policy H SP2 “Strategic Site Allocations” of the Arun Local Plan is a lengthy policy that seeks to guide the development of all the Council’s strategic allocations i.e. it is not specific to the strategic allocation at Yapton (SD7). Accordingly, some elements are more relevant than others. However, we address the relevant requirements in turn below with reference to existing documentation.

General

Policy SP2 identifies a general requirement for strategic allocations to be comprehensively planned, and for development proposals to have regard to a masterplan endorsed by the Council. The purpose of such a masterplan is to ensure that it incorporates high quality design giving a sense of place and a permeable layout (as set out in the policy).

The Yapton allocation has been comprehensively planned. Throughout the design evolution the allocation was seen as a whole and this was made clear through the pre-application process and public exhibition. The Design and Access Statements (DAS’s) submitted as part of both application (Y/91/17/OUT and Y/92/17/OUT) demonstrate how the wider allocation has evolved and been developed and then broken off to become two planning applications that work together.

An updated illustrative masterplan for the allocation has been submitted (drwg no. 1244.04a) and could be endorsed by the Council as part of the application process.

Policy Criteria

We address each of the seventeen policy criteria for planning application Y/91/17/OUT in turn below.

A. integrate appropriately with surrounding communities through an appropriate design particularly where they adjoin by providing for public realm improvements, shared community uses, and connectivity of transport modes including walking, cycling and public transport.

As set out in the Design and Access Statement the proposal has been designed to integrate as far as possible with the surrounding community. Page 28 and 29 of the DAS demonstrate how the proposal retain the existing public rights of way within the allocation and include new footpaths and cycle links through the site.

In terms of cycle links to the wider area, discussions are on-going with WSCC. It is considered appropriate for contributions to be made towards the delivery of a new footway / cycle link between Yapton and Barnham in line with the adopted walking and cycling strategy.

Recent approvals within Yapton (Stakers Farm Y/44/17/OUT) have provided a financial contribution towards WSCC scheme ID 83 which is a contribution towards the implementation of cycling improvements between Barnham and Littlehampton. A financial contribution for this has been put to WSCC to agree.

B. ensure a clear and harmonious relationship between town and country including clearly defined boundaries, using physical features that are readily recognisable and likely to be permanent.

The Design and Access Statement (DAS), Landscape and Visual Appraisal (LVA) and Green Infrastructure Strategy demonstrate clearly how the proposals at Yapton would ensure an appropriate relationship between town and country. A landscape buffer will be established along three of the site boundaries, comprising open space, footpaths and planting. A landscape buffer will be established along the southern site boundary and against part of the existing settlement edge, comprising open space, SUDS features, allotments, footpaths and planting.

C. Protects, Conserves or enhances the natural environment, landscape and biodiversity

The Design and Access Statement and LVA demonstrate that the proposals for SD7 have been landscape led and take into consideration the existing environment. Across the site the key elements such as the retention and enhancement of appropriate trees and hedgerows have been incorporated into the design.

The key landscape and green infrastructure proposals as set out in the DAS and LVA include:

- The provision of 4 hectares of land dedicated to green infrastructure including: public open space, play space and habitat related proposals – representing approximately 34% of the total site area;
- A landscape buffer will be established along three of the Site boundaries, comprising open space, footpaths and planting;
- A landscape buffer will be established along the southern boundary, and against part of the existing settlement edge, comprising open space, SUDS features, allotments, footpaths and planting.
- Areas of amenity grassland would be established close to the edge of the housing to allow for informal play and recreation. The new housing would be designed to overlook these new landscape areas.
- Important trees and hedgerows within the Site will be retained and enhanced as areas of incidental public open space, along with proposed trees within private frontages.
- Public access to the green spaces would also be provided, with a circular footpath routes;
- The loss of trees and hedgerows will be more than mitigated by the proposed native planting.

The application is informed by ecological survey work/ reports all of which confirm a net gain in ecological terms.

D. Incorporates high quality, well connected green spaces, planting within main streets and biodiversity rich open spaces.

The DAS demonstrates the approach to green infrastructure on page 46. A Green Infrastructure Strategy is also submitted. This strategy demonstrates:

- Amenity grass with wildflowers and bulbs at the entrance to the site with backdrop of trees along previous rail line;

- Avenue street trees such as Acer Campestre or Pryrus Calleryana
- Robust mixed hedgerow interspersed with occasional trees at varying distances providing filtered views from the development
- Clusters of trees located in corners of the site as per local character
- Proposed green corridor next to to existing boundary edges enhanced with bulb planting
- Planting in and around SUDS with the potential for amenity mown grass strip around the edge of site for an informal walking route
- Amenity grass with occasional small groups of trees at the periphery. Use of larger trees such as Quercus Robur and Evergreen such as Pinus Sylvestris.

The PROWs throughout the site are also being retained.

E. extend, enhance and reinforce green infrastructure and publicly open space

See above.

F. new community hubs where required to be provided, shall be well located taking account of permeable layout to all transport modes and shall as far as possible cluster retail, commercial and community uses.

This criterion is not relevant to Yapton as a new community hub is not required as part of Policy H SP2c (which is specific to this allocation).

G. where existing village centres are within or will serve the needs of strategic development sites their improvements as sustainable centres will be required.

Insofar as there is an identified need and it is related to the development (such that the CIL Regulations can be complied with), the applicant is willing to make S106 contributions to the improvements to Yapton Village centre.

H. where community buildings are provided these shall be designed and provide for a range of uses such as healthcare, policy, faith and community groups.

This criterion is not relevant as new community buildings are not proposed on site as part of Policy H SP2c (which is specific to this allocation).

I. integration of community hubs and local centres of an appropriate form and scale into the design and layout of development proposals where identified in the specific allocations policies H SP2 a-c.

This criterion is not relevant to Yapton as a new community hub is not required under Policy H SP2c.

J. ensure walkable access to local community, recreational and shopping facilities, jobs and accessible transport.

The context plan in the DAS shows how the allocation at Yapton is within a walkable distance of all facilities within Yapton. Furthermore the movement and access plan also included within the DAS demonstrates the location of the bus routes within a short walking distance from the site.

K. address the off-site capacity requirements, that relate to that particular allocation, identified in the Arun Transport Assessment (2016 and update 2017 and subsequent relevant assessments) and local highway network.

Detailed transport work has been carried out that considers the impact of the allocation as a whole. This work is clearly set out within the Transport Assessment (TA) submitted as part of the planning application.

Notably, Highways England do not object to the proposals and the project team are working with WSCC as highways authority to resolve any outstanding issues which now relate only to the extent of the necessary financial contributions.

L. Positively respond to sustainable water management taking particular account of the coastal plain topography which may require strategic surface water solutions.

The submitted Flood Risk Assessment and Drainage Strategy demonstrates the approach to sustainable water management and the appropriate on-site surface water solutions such as the implementations of SuDs in the form of permeable paving, cellular storage tanks and detention basins.

The site layout has been developed to avoid areas of surface water flooding, all dwellings will be located in areas at very low risk of surface water flooding. A formalised surface water drainage system will be designed to accommodate storm water runoff for all events up to 1 in 100 year 40% climate change. The appropriate on site surface water solution will keep run off to pre-development (greenfield) rates.

The EA has no objection to the application at Bilsham Road, Yapton.

M Maintain and enhance any important features, characteristics and assets of the local areas:

The DAS establishes the design concept for the allocation and its constituent parts all of which are set out from page 37. The main focal points are set out below:

- Retaining existing vegetation where possible to respect existing landscape character and field patterns;
- Protecting all existing trees and hedgerows of merit;
- Replacing low value quality trees and hedgerows with native planting;
- Creating additional structure throughout the site through extending field boundaries in a way which help contain and define the development whilst retaining character;
- Reinforcing residential amenity through, where possible, reinforcing boundaries with additional planting;
- Respecting the setting and alignment of public rights of way;
- Providing new focal green spaces;
- Connecting the green spaces;
- Creating landscaped edges;
- Providing a primary street;
- Providing secondary streets;
- Taking cyclists through the allocation site;
- Providing appropriate densities which is appropriate to the location and surrounding character; and
- Providing areas for children's play including providing two new locally equipped areas of play within the development within a 500m walk of the majority of the new housing.

The proposals have responded appropriately to the surrounding area of Yapton. The documentation submitted in support of the planning application demonstrates that the character of the surrounding area has been assessed and responded to (insofar as it is relevant to a masterplan / outline application).

N. provide for the required infrastructure, that relates to that particular allocation, in accordance with Policy INF SP1 and the Infrastructure Delivery Plan

The strategic infrastructure to be provided by the Yapton allocation is identified in Policy H SP2c. We address this specifically later in this note.

O. enable strategic District wide infrastructure to be delivered at strategic sites if the location is appropriate for the District.

As above.

P. consider inclusion of an area of the site for Self-Build and Custom Build.

The applicant has considered the inclusion of Self Build and Custom Build homes as part of the planning application however it is not considered to be appropriate.

Q. consider the delivery of an area of the site for Gypsy and Traveller accommodation

The applicant has considered the potential to deliver an area of the allocation as a site for Gypsy and Traveller accommodation however it is not considered appropriate.

The Arun Local Plan Housing Implementation Strategy (March 2017) identified that pitch targets have been met for Gypsy and Travellers (for both public and private pitches) between 2012 and 2017 and, as a result, only four pitches are required across the District in the period to 2027.

The Council has stated that it will produce a Gypsy and Travellers and Travelling Showpeople Site Allocation Document to identify land for these small number of additional pitches. Accordingly the location of these pitches will be determined subsequently as part of a separate DPD process.

Policy H SP2c “Inland Arun – Yapton (SD7)”

Policy H SP2c sets out the policy requirements specific for Yapton (SD7). It identifies that the allocation should provide at least 500 dwellings over the plan period and list 4 criteria that should be taken into consideration. We address each in turn below.

A. provide a contribution towards new nursery and primary places education facilities or the improvement or expansion of the relevant existing facilities

The policy is flexible and allows for provision on-site or financial contribution to off-site improvements. Yapton Parish Council have a preference that only one primary school should be available in the village and therefore the current school should be expanded.

Detailed work carried out by the strategic allocation promoters, has been discussed and agreed in principle with WSCC, ADC and YPC. This work demonstrates that following the gifting of the land from the Stakers Farm application the current school site is of a sufficient size to be expanded. The costs associated with this expansion is currently under review by the applicant and WSCC. The appropriate financial contribution for the expansion of Yapton Primary School will be provided through the S106 agreement.

b. contribution towards the equivalent of Tier 7 library facilities or the improvement or expansion of the relevant existing facility

The policy is flexible and a financial contribution towards the equivalent of Tier 7 library facilities or the improvement or expansion of the existing facility. In this regard the applicant would be happy to make an appropriate financial contribution to off-site improvements. As such this is a matter to be addressed through relevant Section 106 contributions consistent with the CIL regulations.

c. improvements to the A259 between Climping and Littlehampton

Detailed discussions with WSCC, as highway authority, have taken place in relation to the required improvements along the A259. During the pre-application discussions WSCC did not raise any improvements between Climping and Littlehampton with the exception being the cycle route to Barnham Station.

d. contribution towards new healthcare facilities which will be incorporated at Ford (SD8) or the improvement or expansion of the relevant existing facilities.

The Coastal West Sussex CCG has provided comments on the submitted application and confirmed that a financial contribution of £273,965 is the most appropriate in these circumstances to provide additional capacity in existing primary care facilities in the vicinity of the development. As such this is a matter that will be addressed through relevant section 106 contributions consistent with the CIL regulations.