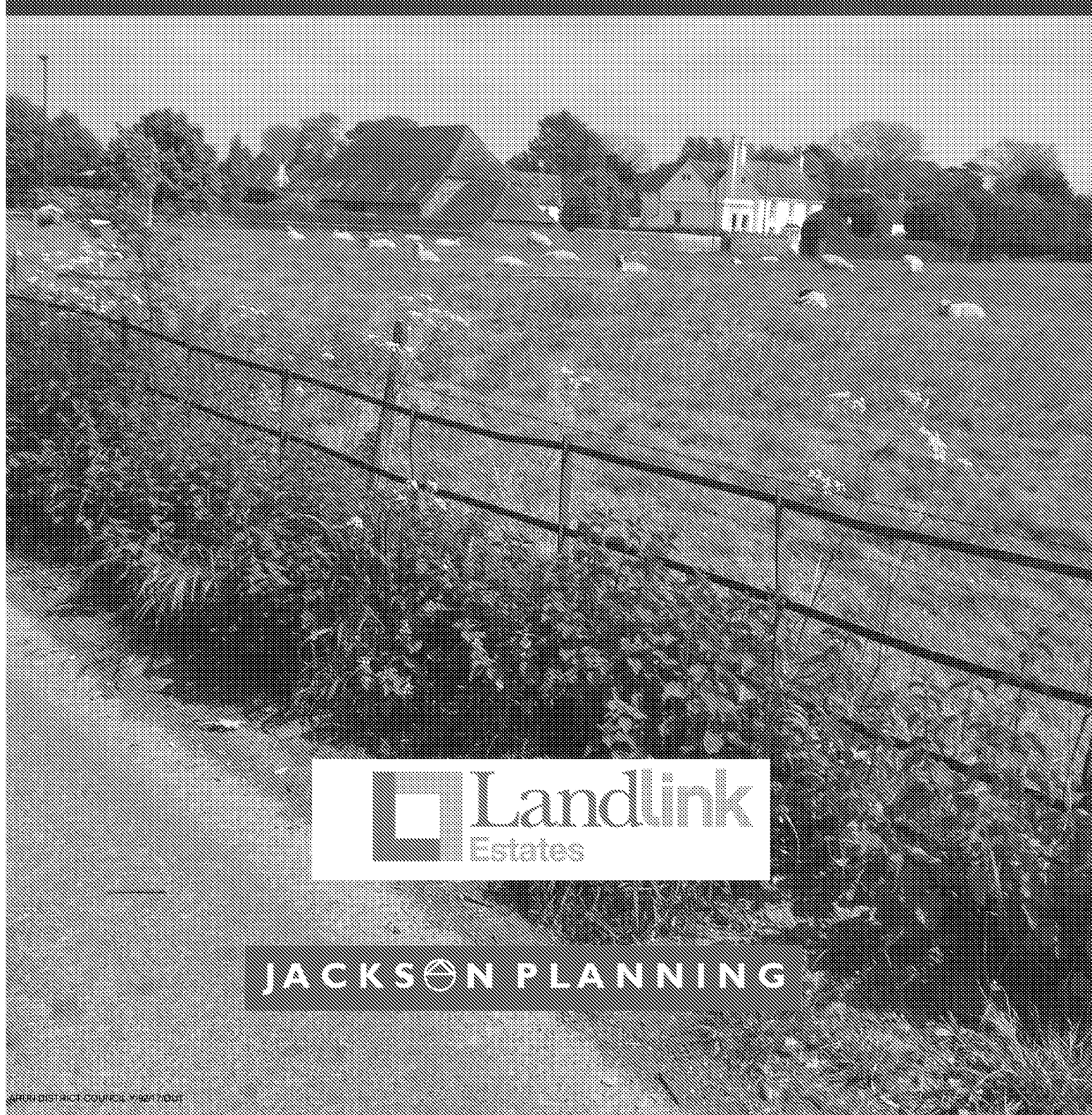


Landlink Estates

Land at Drove Lane Yapton

Planning Statement & Summary of Application

December 2017



JACKSON PLANNING

Land at Drove Lane, Yapton

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Executive Summary

- This planning application forms one of a pair of applications submitted in respect of land at Drove Lane and Bilsham Road Yapton allocated in the Arun Local Plan under policy reference SD7 for a combined at least 400 dwellings as part of the strategic housing supply for the District (the policy is subject to unresolved objection on site capacity and the Inspector's interim recommendations at the time of this submission).
- This outline application with all matters reserved, save access, is for up to 300 dwellings, link road, surface drainage, open space and landscaping is made by Landlink Estates Ltd.
- The Council considered that a development at a capacity of 550 dwellings would not trigger the need for an Environmental Impact Assessment and issued a screening opinion to confirm this.
- The site is not located within an area designated for landscape sensitivity or of ecological importance. The northern strip of the land alongside Yapton Road lies within the Main Road part of the Yapton Main Road Conservation Area.
- Access is proposed and pre-application advice confirms proposals are sound in nature and conform to national and local planning policy with respect to sustainability and traffic impact taking into account proposed mitigation of traffic impact through contributions.
- There are no ecological designations within the site and no designated sites in close proximity to the site. The Preliminary Ecological Assessment provided indicates that most of the site is of limited ecological value and that the proposals will result in significant biodiversity gain.
- This Flood Risk Assessment shows that the proposed development will be fully compliant with the requirements of the NPPF, as well as local policies with regard to flood risk and drainage.
- The site is not subject to landscape designations and no trees will be lost as part of the proposals; the proposed development will result in an initial moderate adverse effect upon the immediate landscape and its setting, reducing to minor-moderate adverse after 15 years once the tree and hedge planting has fully established.
- The proposed development of the site represents no impact on the fabric of the identified heritage assets and, at most, negligible impacts on the setting of some assets that does not affect their heritage significance. Any archaeological remains will be dealt with by an appropriate condition.
- The public benefits that flow from approval of this application are numerous: a significant boost on overall housing supply within Arun in a sustainable location, including 30% affordable housing, a new link road, green infrastructure network and open spaces and long term protection for the part of the site within the Conservation Area.
- The application is policy compliant and demonstrates that the proposed capacity is capable of being accommodated successfully on the site without detriment to the rural character and clearly is a proposal for sustainable development, therefore, planning permission should be granted following formal adoption of the Local Plan

I. Introduction

- I.1 Jackson Planning has prepared this statement in support of an outline planning application for residential development at Drove Lane, Yapton which represents the western part of the allocated site (site SD7) as proposed for allocation in the Arun Local Plan.
- I.2 The applicant is Landlink Estates who are the commercial property arm of the Langmead Group and promote and develop land to support the business interests of the Group.
- I.3 This application is submitted at the same time as an application made by Gleeson Strategic land for the remainder of the strategic site SD7. The applications are a complementary pair and have been developed together around a single masterplan.
- I.4 A plan showing the two separate sites and their control is included in the supporting material for information.
- I.5 This statement has been prepared in support of the outline planning application **with all matters reserved save access, for up to 300 dwellings, link road, surface drainage, open space and landscaping**

Screening Opinion

- I.6 A screening request was made by both Landlink Estates and Gleeson Strategic Land (for the whole of the site allocation SD7) for up to 550 dwellings and was considered under the reference PE/00464/17. The opinion confirmed that an Environmental Impact Assessment was not required. The application proposal is considered to be an urban development project as defined within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and exceeds the threshold at which screening is required.

2. Pre-Application Assessment

- 2.1 The site **SD7** was subject to a joint pre-application submission by the two parties who have agreed to submit a 'complimentary pair' of applications. It was promoted jointly through the Arun Local Plan and confirmed as an allocation for at least 500 dwellings as part of the recommended modifications to the plan.
- 2.2 The pre application submission was made in August 2017 under reference PPA/148/17. The pre-application response was provide in draft on 1 December 2017. Some of the substantive responses were forwarded these are as follows.
- 2.3 **Planning Policy** – This response highlighted that the site proposed as an allocation within the emerging Local Plan under Policy H SP2c, as SD7 for 400 houses plus specific infrastructure. The Local Plan Inspector in the interim report has acknowledged the capacity of the site is for 'at least 500 dwellings' although this has been challenged. The Council believe that the issue of a specific capacity is one that should be considered as part of a planning application, and not the Local Plan. They state that the Local Plan identifies that the site will accommodate 'at least 400 dwellings' which means that it can potentially accommodate a higher figure, subject to capacity and design testing. They go on to say that **the allocation is currently subject to a pre-application advice request and, based on the information submitted, there are concerns about the ability of a higher number of units (over 500) to be accommodated on the allocation. As a consequence, the Council do not propose to modify the capacity of the allocation.**"
- 2.4 The pre-application response has not demonstrated why the site capacity would need to be limited to 400 in the policy. The applicants will challenge this position at the consultation on the further modifications to the plan, especially given the Inspector's firm guidance in his interim report. The policy will remain with outstanding objections until the Local Plan is adopted unless the Council accept the Inspector's direction.
- 2.5 **Housing Enabling Team** - The Council aims to ensure that 30% affordable housing is achieved on all new residential developments in the district where more than 15 units are proposed such as on this site. Based upon a proposal of up to 550 dwellings then 165 (30%) would need to be affordable to comply with the Council's current policy requirements. The tenure of the affordable housing is to be agreed with the Council but a split of 75% rented and 25% intermediate housing is initially sought.
- 2.6 There is high demand for affordable housing throughout the Arun District for both rent and low cost home ownership. As at July 2017 there were 1,228 households in housing need on the Council's housing register.

Land at Drove Lane, Yapton

- 2.7 The applicants were advised that the quantum of market and affordable housing is broadly delivered as follows:

Beds	1	2	3	4+
Market	5- 10%	40- 45%	35- 40%	10- 15%
Intermediate Homes	15- 20%	50- 55%	25- 30%	0-5%
Affordable rented	35- 40%	35- 40%	15- 20%	5- 10%

- 2.8 The intermediate housing (shared ownership) dwellings should comprise of a mix of 1, 2 and 3 bed dwellings - 4 bed dwellings are not recommended for shared ownership purposes
- 2.9 Integration - The affordable housing should be integrated into the overall development to form clusters of no more than 20 dwellings. The affordable housing should be constructed and designed to be indistinguishable from the market housing. The applicants should seek to make at least 1% of the rented affordable dwellings are fully wheelchair accessible.
- 2.10 All of the necessary affordable housing requirements would need to be included in s106 planning obligation not secured by planning condition. A commentary on this is included in the attached statement on affordable housing.
- 2.11 **Green Spaces** – Responded as follows: This proposed development site and immediate context are not subject to any landscape designations, but the northern extremity of the site lies within a conservation area.
- 2.12 Developments are expected to provide open space on site. The Council's SPG guidelines which apply to developments of houses and are based broadly upon the National Playing Fields Association's (NPFA) "Six Acre Standard". The superseded Fields in Trust guidelines (FIT) 'Beyond the Six Acre Standard' recommends that 3.2 hectares of open space are provided for every 1,000 people ie 32 square metres of open space per person. We would require confirmation of the areas of public open space being proposed with this development, as a minimum proportionate to the proposed dwellings. Provision of LAP, LEAP, NEAP and MUGA (Multi-Use Games

Area) would be sought on site, with confirmation of play provision being provided to be submitted and approved.

- 2.13 The indicative layout shows accessibility to the larger areas of open space particularly to the periphery of the proposed development area, but with good corridors of connecting greenspace and park/ amenity/ children's play space shown within these. The layouts would appear to indicate greenspace that is integrated within the development and accessible to residents.
- 2.14 Consideration appears to have been made to the siting of buffer areas to form a green frame to the proposals which would in turn provide a softening and green link with the existing residential development on this fringe.
- 2.15 The indicative layout for the NEAP offer has integrated these centrally within the development where they may also provide connectivity with existing residential surrounds.
- 2.16 The response to the consultation is as follows: the applicants will provide a detailed landscape and planting plan at Reserved Matters stage. It is inappropriate to provide full landscape details at outline stage when landscaping is reserved for future consideration.
- 2.17 The applicants have confirmed that POS and play spaces will be provided and anticipate a planning condition requiring a landscape design showing the various open space elements and their proposed uses. This will be secured at Reserved Matters (RM) stage.
- 2.18 The Design and Access Statement shows that this approach follows a quality design process which allows for the incorporation and protection of existing features.
- 2.19 The siting of the NEAP and associated facilities will be secured as part of the RM application including arrangements for long-term maintenance.
- 2.20 The proposal includes significant buffer areas and wildlife habitat zones along with SUDS provision these will be secured through RM and a management plan which is anticipated as a planning condition.
- 2.21 The applicants anticipate a planning condition requiring arrangements for future management proposals. At this stage Landlink Estates anticipate a private management company managing the open spaces.
- 2.22 **Arboriculture** -The Consultant Tree Officer advised that central areas are largely free of tree content but there are strong field boundary hedges which contain some fine examples of **Field Maple** and **Pedunculate Oak** many of which are worthy of a TPO.

- 2.23 He advised that BS 5837:2012 requires that the following information be submitted in support of an OUTLINE Planning Application : a full **Tree Survey Schedule** to BS5837 standards, Root Protection Area Schedule to BS5837 standard and a **Tree Constraints Plan** on an accurate Topographical layout base showing tree gradings; crown spreads and root protection area.
- 2.24 The tree officer also made reference to requirements for a full application that would be required at RM stage. He has advised the once the tree information is submitted he can advise on suitable TPOs on the site.
- 2.25 The application is supported by the information required and there is no impact to good quality trees on the site that would merit a TPO. No trees are proposed for removal. There will be significant additional planting as a result of development resulting in net biodiversity gain across the site.
- 2.26 **Ecology** – The officer advised due to the size and location of the development we would recommend that an extended phase one habitat survey is undertaken by a trained ecologist to determine the presence of protected species within the site and the impact a development would have on the surrounding environment. Following this survey if any further surveys are recommended we would require these to also be undertaken and any mitigation required to be considered and included within the planning application
- 2.27 The surveys have been completed as requested and form part of the technical support for the application.
- 2.28 **Archaeology** – The officer advised that a development of a site of this size in a location such as this should be accompanied by a desk-based assessment of its archaeological potential and a proposal to evaluate that potential by trial excavation. The latter, together with suitable measures to enable proper conservation (i.e. through sympathetic foundation design, full excavation and recording and/or preservation in-situ) could be secured through the application of a standard condition.
- 2.29 A full Desk Based Assessment (DBA) report has been prepared and submitted in support of the application. The applicants anticipate a condition requiring compliance with the scheme of investigation as agreed in the DBA.
- 2.30 **West Sussex County Highways** – Separate pre-application discussions have been completed by the applicants' highway consultants. WSCC support the principle of development however the application will be heavily scrutinised on perceived highway impact and the mitigation measures proposed (especially given that Climping was refused on highway impact, even though there was no highway objections to the development).

3. Policy SD7 – The Site

The Context -The Site and Surroundings

Background

- 3.1 The **site SD7** is subject to control by two parties who have agreed to submit a 'mirror pair' of applications. It was promoted jointly through the Arun Local Plan and the Inspector recommended confirmed as an allocation for at least 500 dwellings as part of the recommended modifications to the plan.
- 3.2 The whole site allocation extends to approximately **24.13ha** in total. This is comprised of four arable fields and a small grass field. The eastern part is controlled by Gleeson Developments Ltd on behalf of the landowners, this extends to approximately 11.73 ha.
- 3.3 The application site extends to approximately 12.4 ha of agricultural land at the south-west of Yapton. The site has defined boundaries with the B2233 Yapton Road to the north, Drove Lane to the west and residential properties off Tack Lee Road to the north-east.
- 3.4 Most of the land comprises a single field currently used as arable farmland and is flat and featureless. The single field parcel is separated from Yapton Road by a narrow parcel of land alongside the road with a low hedge between. The land was on the line of the former Portsmouth to Arundel Canal and has a modest depression. That land comprises rough grazing and is included within the Yapton Conservation Area. A mature hedge with trees marks the eastern boundary, beyond Tack Lee Road; other boundaries are open or marked only by fences.
- 3.5 The site is not located within an area designated as of landscape sensitivity or of ecological importance. The northern strip of the land alongside Yapton Road lies within the Main Road part of the Yapton Main Road Conservation Area.

Planning History

- 3.6 There is no significant planning history in relation to this site.

5. The Proposal

Introduction

- 5.1 The development of site SD7 is envisaged as a strategic development to support housing need across the District and contribute to the supply of market and affordable housing. The Council have been clear that they require a comprehensive solution for the development of the land despite the split in ownership/ control. The key feature of the joint approach is the creation of a spine road throughout the two land ownerships that connects Drove lane to Bilsham Road as a new village street.
- 5.2 Whilst the planning applications for the respective parts of the site have been submitted independently the two controlling interests have continued to collaborate and jointly commissioned or separately commissioned the same technical consultants to ensure a comprehensive scheme. Critically master-planning, urban design and landscape design has been prepared by the same consultants for both applicants.

Vision

- 5.3 The vision for the site is to create a natural extension to the village based on the new connecting street to reinforce and enhance the rural village character and setting. The new road will create some additional network capacity; this will be an active street with property frontages and safe junctions with the existing road network. The site design is a landscape-led solution to create a better outer boundary to Yapton that respects and enhances the rural setting. The guiding principle has been to develop a design solution that is rural in character.
- 5.4 Given the very low ecological value of the site the opportunity for biodiversity gain is significant. The site will need to incorporate SUDS, which will comprise attenuation areas that can serve as multifunctional greenspace. The central open space and peripheral spaces proposed within the scheme is designed to complement existing spaces in the village and add to the offer for residents.
- 5.5 The character of the conservation area will be respected with key features of local distinctiveness creating design drivers for the scheme at the detailed stage. The former Portsmouth to Arundel canal line can form part of an attractive amenity solution and this forms part of the undeveloped 'frontage' including the small paddock on Main Road to the site that sits within the Conservation Area.
- 5.6 Draft Heads of Terms for the anticipated legal agreement for s106 matters will be developed over the course of the application processing. This will set out how the application will support local infrastructure that will serve the new community

including contributions to education off-site; contributions towards the existing GP practice in the village; and contributions towards a community facility.

- 5.7 Landlink Estates and Gleeson Strategic Land have engaged with local residents and the Parish council, Headmaster and Chair of School Governors to understand in detail the local issues, local requirements for the development and work with them to mitigate any residual harm that might arise. A full statement of community involvement is submitted in support of the outline application.

The Proposal

- 5.8 The proposal is described as follows: **Outline application with all matters reserved save access, for up to 300 dwellings, link road, surface drainage, open space and landscaping.**
- 5.9 The proposal is for an outline application for the western part of the development of the strategic site SD7. This mirrors the application for the remainder of the site submitted by Gleeson Strategic Land. The proposal will boost housing supply in Arun. The proposal is for a well-designed development that integrates existing landscape features, public rights of way and uses proposed landscape and open space as key design drivers to achieve an overall quality place.
- 5.10 A joint comprehensive masterplan has been developed around a strong design rationale that seeks to integrate with the local context but provide a well-considered extension to the village that provides a new linking street and integrates the development into the countryside setting.
- 5.11 The outline application has all details of the proposal (save access) reserved for future consideration but the design rationale and masterplan are well developed to give the Council confidence that the site can accommodate the proposed number of dwellings and achieve a high quality environment for existing and future residents.
- 5.12 The design rationale is fully explained in the Design and Access Statement for the application prepared by Richards Urban Design. The suggested mix of units is as follows:

Total	No.	%
1 bed apartment	36	12%
2 bed apartment	8	3%
2 bed house / bungalow	88	29%
3 bed house / bungalow	105	35%
4 bed house	63	21%
TOTAL	300	100%

6. Planning Policy

National Planning Policy Framework (NPPF)

- 6.1 The National Planning Policy Framework ('NPPF') was introduced in March 2012 as a key output resulting from the Government's Plan for Growth agenda. It sets out national planning policies for England and how these are expected to be applied to proactively drive sustainable development and growth and to boost significantly the supply and delivery of new housing.
- 6.2 The 'golden thread' of sustainability was the major change introduced by the NPPF with a presumption in favour of sustainable development. The National Planning Framework has made it clear that a presumption in favour of sustainable development is the basis for every decision. In addition the NPPF confirms that the positive approach to development management.

National Planning Policy Guidance (NPPG)

- 6.3 Planning guidance has been adopted in order to guide the application of the NPPF. This is extensive guidance covering many topics.
- 6.4 In particular Paragraph: 019 Reference ID: 12-019-20140306

What weight does an emerging local plan carry in decision-making?

The National Planning Policy Framework sets out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the National Planning Policy Framework.

Revision date: 06 03 2014

- 6.5 At the time of the application submission the Local Plan is still at examination but has progressed a long way towards final adoption, however, there is a disagreement between the Inspector and the Council in respect of the application site's capacity. The lack of evidence to support the lower threshold suggested by the Council coupled with off-site provision of the school and the outstanding dispute to the draft policy leaves the policy position uncertain.
- 6.6 This report addresses these issues and demonstrates that this proposal is entirely consistent with the NPPF given the need for sustainable development solutions and within the context of the interim report of the Inspector, and the strong community input into the development solution for this site that opposes a second primary school in the village and the anticipated adoption of the Local Plan Review in April 2018.

The Development Plan

Arun Local Plan Adopted 2003 –Saved Policies

- 6.7 The saved policies of the Arun Local Plan pre-date the NPPF by some 9 years, where there is conflict with the NPPF the policies will have little weight in the planning balance. Given the progress of the new local plan these policies have increasingly irrelevance.

Arun Local Plan Review 2014 submission version

- 6.8 Prior to the first suspension of the Local Plan Examination the Local Plan Review policies were suggested as the new NPPF compliant policy framework for the District. These policies may be subject to change through modification and examination. Upon adoption these policies will replace the saved 2003 Local Plan policies.
- 6.9 The key site specific policy consideration is contained within policy HP SC 2

Yapton (SD7)

Located to the south west of Yapton development proposals in the Strategic Allocation will provide at least 400 dwellings over the plan period. Development proposals must comply with the following key design and infrastructure requirements;

- a. provide a one-form entry primary school and nursery places,
- b. a new library facility,
- c. improvements to the A259 between Climping and Littlehampton, and
- d. contributions towards new healthcare facilities which will be incorporated at Ford

- 6.10 Generally the policies follow the format of planning legislation, NPPF policy and NPPG advice and best practice. Appendix one to this statement makes a brief assessment of compliance with the specific policy considerations. Generic policy considerations on highways, design, landscape, biodiversity, trees etc. are dealt with in the topic specific technical reports and are not repeated here.

Local Plan Examination and Anticipated Adoption

- 6.11 At the time this report was drafted the Local Plan Examination was still open and the Inspector had held hearings in September 2017. The Inspector's Interim Report on - Modifications to the Local Plan (November 2017) found that the capacity of the site at Yapton was for 'at least' 500 dwellings and he remained open with regard to the final figure pending additional evidence on the solution to Primary School Education in the village. The Council have ignored this strong direction and instead kept to the policy capacity of at least 400 units based on development management

concerns. They do however reiterate there is no upper limit on the numbers of units in the policy.

- 6.12 Issues over pooling restrictions under CIL regulations were raised by the Inspector and any infrastructure contribution must be mindful of the limitations. It is anticipated that the Local Plan will be adopted in April 2018 and this proposal will be judged against the new adopted Local Plan policy.
- 6.13 The key policy consideration for the site is policy HPS 2c (SD7) this allocates the site for at least 400 dwellings. This plan supersedes the limitations on the Built up Area Boundary set out in the Yapton Neighbourhood Plan (discussed below).

Yapton Neighbourhood Development Plan (NDP)

- 6.14 The Yapton NDP was made in 2014 and forms part of the Development Plan for the area. The NDP did not anticipate the development of site SD7, and it is outside its remit being a strategic allocation made within the Local Plan.
- 6.15 There are no specific design policies in the Yapton Neighbourhood plan in respect of new built development. The policies guide broader issues and replicate the Arun Local Plan, these are examined in appendix one.
- 6.16 Whilst the NDP has no direct locus over the development of the strategic site the application has been developed in consultation with Yapton Parish Council who are at the early stages of considering further revisions/ site allocations to the NDP. Events have overtaken somewhat with the granting of numerous planning permissions outside of the NDP allocations based on a failure of the District (at that time) to demonstrate a five year supply of housing land.

7. Transport Assessment

- 7.1 An initial transport review was completed by Odyssey to consider the impact of up to 600 units on the Land South West of Yapton, they confirm in access and highway terms it is suitable for a development of up to 600 dwellings. This was considered at pre-application stage to support the combined site.
- 7.2 The Council have expressed a desire to create a linking street from Bilsham Road to Drove Lane through the development. In principle this is supported as it creates additional network capacity and allows new sustainable links to reduce the need for car journeys. A through-route across the site should appear as a traditional village street with direct access to dwellings consistent with the design speed.
- 7.3 A Transport Assessment has been prepared in support of an outline planning application for a proposed residential development of up to 300 dwellings on land south of the B2233 Main Road, Yapton. Following scoping with WSCC, described above, the principle of the access is considered acceptable. The primary point of access is from Drove Lane, which will be improved to an adoptable standard. A new pedestrian access will also be provided with a new crossing point on the B2233 Main Road.
- 7.4 It has been demonstrated that the site is sustainable in terms of its accessibility to local facilities via non-car transport modes, and is located within convenient walking distance of bus stops offering regular bus services.
- 7.5 Capacity assessments of key junctions in Yapton show that the highway network generally operates within capacity and that the introduction of development traffic will not result in a severe impact.
- 7.6 The Oystercatcher and Comet Corner junctions on the A259 have been identified as requiring capacity improvements by 2022 regardless of the proposed development coming forward and two potential schemes have been presented. Highway contributions will be made available to assist the WSCC infrastructure delivery plan in this respect.
- 7.7 Given wider land ownership by the applicant there are opportunities to improve off-road cycle links. A plan showing options has been prepared for discussion with the Council. It is considered appropriate for contributions from the entire scheme on Strategic site SD7 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. This will help to improve non-motorised road user safety and improving sustainable links to Barnham railway station.

- 7.8 The TA concludes that the development proposals are sound in nature and conform to national and local planning policy with respect to sustainability and traffic impact. The proposed mitigation of traffic impact by contributions is also considered a reasonable way forward in helping WSCC to delivery their adopted infrastructure delivery program.

Travel Plan

- 7.9 A Residential Travel Plan (RTP) has been prepared for the site. The aim and objectives of the RTP can be summarised as:

- Reducing congestion;
- Improving air quality;
- Improving road safety; and
- Reducing noise pollution.

- 7.10 The RTP will therefore be used to inform the preparation of travel information packs to be given to residents, as recommended by WSCC. These packs can be excellent tools for informing residents of the travel choices available, and act as a mechanism for delivering incentives and additional information.

- 7.11 The key issues that form the objectives of this RTP in the context of the development proposals are:

- **Objective 1:** To reduce the number of single occupancy vehicles (SOVs) to and from the site;
- **Objective 2:** To increase the use of sustainable modes (walking, cycling and public transport);
- **Objective 3:** To encourage residents to choose modes of transport that will provide benefits to their health and wellbeing; and
- **Objective 4:** To increase awareness of and encourage the use of available sustainable modes of transport.

- 7.12 The overall objective will be to reduce SOV trips by a total c.10% over 10 years, while increasing the mode share of other more sustainable travel modes.

8. Biodiversity

Outcomes

- 8.1 There are no designations within the site and no designated sites in close proximity. Ecological surveys have been carried out on the majority of the site; the Preliminary Ecological Assessment indicates that most of the site is of limited ecological value.

Survey Findings

- 8.2 Lizard Landscape Design and Ecology has provided an Ecological Design Strategy including a Habitat and Ecological Enhancement Management Plan. A Preliminary Ecological Appraisal (PEA) Survey and Detailed Reptile Survey have previously been carried out in September 2016 and October 2016 respectively. The Ecological Design Strategy has been based on data from these protected species surveys and previous reports, which established the baseline ecological conditions.
- 8.3 The site is comprised of a large continuous arable field and a small pastoral field separated by a footpath and native hedgerow. The majority of the site comprises an arable field with thin field margins and was assessed as having a low ecological value.
- 8.4 Ecological constraints within the site that were identified during the PEA concerned reptiles, breeding birds and bat flight paths. Mitigation measures for these protected species involved the retention and enhancement of the field margins, retention of the hedgerows and scattered trees along the north east and south east boundaries and the use of a sympathetic lighting system including recommendations for additional habitat creation and enhancement.
- 8.5 Ecological enhancements that are considered to be achievable within the proposed scheme; include the integration of bat and bird boxes into the new dwellings; creation of freshwater habitat in the form of a pond; wetland grassland habitat; native tree, shrub and hedgerow planting; creation of wildflower meadows; log piles and compost heaps; and maintaining connectivity through the housing area with the use of hedgehog tunnels.

9. Flood Risk and Drainage

- 9.1 A report on Flooding has been prepared by Odyssey. The main findings are as follows. The EA Flood Risk Map indicates that the vast majority of the site is located within Flood Zone 1: land having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) in any given year. There are no records of fluvial flooding at the site within ADC's Strategic Flood Risk Assessment (SFRA).
- 9.2 The EA's updated Flood Map for Surface Water (uFMfSW) shows that the site itself is largely located in an area of very low surface water flood risk – a less than 0.1% chance of flooding in any given year. The mapping indicates that to the west of the site, Drove Lane is at high risk of surface water flooding, however this appears to be restricted to within the highway. There is a narrow area to the north of the site, which is susceptible to low and medium risk surface water flooding. There is also a small area of surface water flooding associated with a field boundary towards the centre of the site, as well as the river towards the east.
- 9.3 According to the SFRA, the site is located within a 1km grid area where the susceptibility to groundwater flooding is more than 25%, but less than 50%. Susceptibility in the eastern half is more than 50%, but less than 75%.
- 9.4 The surface water drainage strategy will demonstrate that the proposed development can be drained in a sustainable manner, commensurate with local and national policy. The National Planning Policy Framework (NPPF) requires that flood risk to land and property is not increased as a result of new development. The proposed surface water attenuation systems will be designed to accommodate the 1 in 100 year event plus 40% allowance for climate change.
- 9.5 The SuDS features will provide appropriate treatment for surface water runoff from the site. Maintenance of the SuDS will be carried out through the implementation of an approved maintenance management plan.
- 9.6 It is anticipated that foul flows will be pumped from the site into the existing local public sewer system, and offsite improvements and upgrades may be required to increase the capacity of the network to accommodate the flows from the proposed development. This is subject to discussions with Southern Water as the development plans progress.
- 9.7 This assessment shows that the proposed development will be fully compliant with the requirements of the NPPF, as well as local policies. Issues relating to flood risk and drainage should not represent an obstruction to the development of the site.

10. Landscape Appraisal

- 10.1 Overall the landscape character and visual impact is as anticipated, the degree of change is significant when the proposal is a change from open arable fields to built development. However the change is not uncharacteristic, as the design has not sought to 'hide' the development with significant planting that would not be characteristic of the open landscape. The proposal, will over the longer term, create a softer outer edge to the village and create open spaces and experiences along the public rights of way that have better capacity and quality than the current linear constrained routes.
- 10.2 There will be an inevitable loss of agricultural land, which although characteristic of the wider landscape is a very small proportion of the overall resource. Arable land will be replaced by built development, however the retention of existing boundary trees and hedgerows will help to contain the effects on landscape character. It is considered that the proposed development would result in an initial moderate adverse effect upon the immediate landscape and its setting, reducing to minor-moderate adverse after 15 years once the tree and hedge planting has fully established.

11. Trees and Hedges

- 11.1 A tree survey has been carried out on the site, a full arboricultural impact assessment shows which trees will be retained and to evaluate the likely effect of construction work on retained trees along with proposed mitigation to protect these trees. Due to the general position of trees along the site boundaries and the lack of trees at the intended access point the overall impact to trees and hedges will be minimal, and trees can be successfully retained and incorporated into the wider masterplan. No trees are proposed for removal as part of the application.
- 11.2 There are no tree preservation orders on any of the trees on site.

12. Agricultural Land Classification

- 12.1 Land within the site is good quality agricultural land in common with most of the available land for development, including all sites on the edge of Yapton. The loss of relatively little of the 'Best and Most Versatile' agricultural land, when considering the District-wide resource is an inevitable consequence of the locations for development, the wide spread of high quality agricultural land in the area ADC's requirement to meet its housing needs. The relatively small loss of this land must be considered against the significant benefits in the overall planning balance.

13. Archaeology and Built Heritage

Archaeology

- 13.1 A desk-based study was completed by Thames Valley Archaeological Services (May 2017) which included reference to the HER, which found: there is a single heritage asset within the site area, the line of the 19thC canal. The site is also partially located within a conservation area, and adjacent to an archaeological notification area and close to several listed building. In terms of potential below ground archaeological remains, the site lies within an area of varied archaeological record and is close to the site of the deserted medieval village of Yapton.
- 13.2 There have been no below ground archaeological investigation within the immediate area. Cartographic sources indicate that the site has not been developed since the 18th Century and it is likely that any below ground archaeological deposits will have survived intact. It will be necessary to provide further information about the potential of the site from field observations in order to draw up a scheme to mitigate the impact of development on any below ground archaeological deposits if necessary. Such a scheme could be implemented by an appropriately worded condition attached to any consent for development.

Built Heritage

- 13.3 A Built Heritage Statement has been researched and prepared by CgMs. The proposed development is not considered to cause any harm to the significance of the identified designated and non-designated heritage assets. The small portion of land in the conservation area is retained almost in its entirety with only a new emergency access proposed to the east boundary. The immediate area has experienced similar residential development in the 20th century, which has retained the legible pattern of 18th century development. The proposed development of the site represents no impact on the fabric of the identified heritage assets and, at most, negligible impacts on the setting of some assets that does not affect their heritage significance.
- 13.4 The assessments of impact have been made with due regard to national, regional and local policy requirements and guidelines and the proposed development can demonstrate compliance with each of these tests.

14. Planning Assessment

- 14.1 This section deals with the issues of policy compliance, sustainable development and the planning balance. The starting point for any planning application is the duty under s38(6) TCPA 1990 that applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF confirms that proposals that accord with an up-to-date local plan should be approved and that the National Planning Policy Framework constitutes guidance for local planning authorities in addition to the development plan.

Policy Assessment

- 14.2 The key consideration is the site-specific planning policy, which is currently in dispute, the Inspector recommends allocation of the combined site for at least 500 dwellings and seeks commensurate infrastructure support. The Council seek 'at least 400 dwellings'. The application, in combination with the adjacent Gleeson controlled land, will deliver the policy requirement both through site specific and off-site contributions to create a sustainable development.

- 14.3 The public benefits that flow from approval of this application are numerous:
- a significant boost on overall housing supply within Arun, including 30% affordable housing units, to meet significant local demand;
 - a new link road in the form of a new village street, adding choice and capacity to the village network;
 - long term retention of an important open space within the conservation area and retention of the line of the former canal;
 - open spaces to serve the new population and enhance the footpath and open space network through the site;
 - contributions to the extension of the school to assist not only with the additional child yield from the site but help maintain the viability of the school in the longer term in line with community wishes (if feasible), as well as contribution to secondary and early years education;
 - contribution to health care facilities to support the new population;
 - significant additional planting to create new biodiversity/ green infrastructure links around the western edge of the village;
 - a softened edge to the village boundary to assist in wider landscape assimilation;
 - contribution to wider off-site cycle networks to help with more sustainable travel choices;
 - A259 junction improvements that will significantly improve the operation of these problematic junctions.

- 14.4 The applicants have considered the community impacts and listened to concerns in particular the need to sustain the village school long term has been heeded, with the applicants commissioning a feasibility study to examine the school extension, along with specific requests by the Parish Council where it is possible to accommodate these and reasonable in respect of the application.
- 14.5 All the technical considerations with this proposal have been considered in detail and there has been liaison between the technical consultants to ensure a 'joined-up' proposal that will in practice deliver a high quality scheme.
- 14.6 Infrastructure will meet the needs of the new population largely secured through a site-specific s106 agreement as the Community Infrastructure Levy has not yet been introduced by the Council.

Design/ Quality Considerations

- 14.7 Whilst only outline the application adequately demonstrates how comfortably the proposals fits on the allocated site, the density overall is 23 dwellings per hectare (gross), which is entirely consistent with neighbouring developments and consistent with the rural character.
- 14.8 The requirements for achieving green field run off rates and sustainable urban drainage provides excellent scope for green infrastructure to enhance the built development and provide multifunctional greenspace for use by the new and existing residents of Yapton. The design allows sufficient space for planting to soften and assimilate development into the landscape over the short term. The design approach allows Yapton to retain its rural character and the reserve matters application will secure the design approach in detail to ensure it reflects the local context.

Proposed Conditions and s106

- 14.9 It is anticipated that planning conditions and a section 106 agreement will be used to secure the details and mitigation which are necessary to make the proposal acceptable. A list of draft planning conditions proposed is included in Appendix 2 of this statement. The Heads of Terms for the s106 agreement will be submitted during the processing of the application when the requirements are known.

Conclusion

- 14.10 The applicants respectfully request that given the proposal is compliant with policy and demonstrates that the proposed capacity is capable of being accommodated successfully on the site without detriment to the rural character and clearly is a proposal for sustainable development, that planning permission be granted following formal adoption of the Local Plan.

Appendix I –Policy Matrix

Policy	Policy Requirement	Policy Compliance
Arun Local Plan		
HPSC2 (SD7)	Inland Arun Located to the south west of Yapton development proposals in the Strategic Allocation will provide at least 400 dwellings over the plan period. Development proposals must comply with the following key design and infrastructure requirements; a. provide a one-form entry primary school and nursery places, b. a new library facility, c. improvements to the A259 between Climping and Littlehampton, and d. contributions towards new healthcare facilities which will be incorporated at Ford	The application site combined with the site under control by Gleesons will deliver 550 dwellings. (Numbers in policy are in dispute) An on site IFE primary school WILL NOT be provided. There is no local support for an additional primary school in the village, and it is not a sustainable long-term solution for primary education. There is local support and physical space to contribute to Yapton Primary School. The application does not include a new Tier 7 library facility on site. Any contribution must meet the CIL tests on pooling restrictions. The application includes a contribution to the A259 junction improvements and plans are submitted showing physical solutions that add capacity above that required by this development. Contributions to healthcare are offered in the draft s106.
HDMI	Housing Mix Requirements The tenure mix for development schemes shall be negotiated on a case by case basis taking any necessary viability considerations into account. Developers shall have regard to the most up to date version of the SHMA.	The proposed illustrative mix broadly reflects the Housing Enabling Officer's suggested mix
ECCP2	Energy and climate change mitigation 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.	It is anticipated that this will be achieved through thermal efficiency in a 'fabric-first' approach. This can be secured through a planning condition.

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Policy	Policy Requirement	Policy Compliance
HER DM5	Remnants of the Portsmouth and Arundel Canal Development will be permitted where it would not adversely affect the remaining line and configuration of the Portsmouth and Arundel Canal and features along it.	The proposal has no direct impact on the line of the former canal. The two access points that cross the canal are a necessary consequence of the request for a link road across the site and when considered in the balance the public benefit outweighs any less than substantial harm.
INF SPI	Infrastructure provision and implementation The Local Planning Authority will support development proposals, which provide or contribute towards the infrastructure and services needed to support development to meet the needs of occupiers and users of the development and the existing community.	The planning application has considered the infrastructure requirements and proposes CIL compliant contributions, which will be set out in s106 agreement.
Yapton Neighbourhood Plan		
Policy E4	Minimising the environmental impact of development	The proposal has been developed to carefully mitigate impacts and has to be sustainable development to be policy compliant
Policy E5	Retention and enhancement of biodiversity	There is very limited biodiversity, there will be mitigation and enhancement will deliver significant biodiversity gains
Policy E8	Conservation Areas	The conservation area remains free from built development and the development overall will preserve and enhance the CA.
Policy EI0	The Former Portsmouth and Arundel Canal	The line of the former canal is protected and development set back from this undesignated heritage feature
Policy PK1	Parking standards for new residential development	Parking will be secured through the RM application.

Appendix 2 - Proposed Conditions

Proposed Draft Planning Conditions

1. Details of the appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
2. Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
3. The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
4. The development hereby approved shall be carried out in accordance with the following approved plans: Site Location Plan, Plan indicating land use Proposed Site Access.
5. Development shall not commence until the Local Planning Authority approves in writing a detailed scheme securing access on to the adjoining land through the link road on the eastern boundary without prejudice to the development of either linked site.
6. Development shall not commence until full details of the proposed surface water drainage scheme, including maintenance and management, have been submitted to and approved in writing by the Local Planning Authority. No building shall be occupied until the complete surface water drainage system serving that property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in accordance with details of the scheme in perpetuity.
7. Prior to the commencement of construction works details of a proposed foul drainage system shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of its siting, design and subsequent management/maintenance. No dwelling shall be occupied until works for the disposal of sewage have been fully implemented in accordance with the approved details.

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8. No development shall commence until there has been submitted to and approved in writing by the local planning authority a scheme of landscaping. The scheme shall include indications of all existing trees and hedgerows on the land, identify those to be retained and set out measures for their protection throughout the course of development.
9. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.
10. Before the development is first occupied or brought into use a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas, shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved.
11. The landscape details referred to in Condition 1 shall include a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscape areas other than privately owned domestic gardens. The landscape management plan shall be implemented in accordance with the approved details.
12. No development shall take place until the applicant has secured the implementation of a programme of archaeological evaluation in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority
13. No development shall take place until details of laying out, timetable for provision and future maintenance of Public Open Spaces has been submitted to and approved in writing by the local planning authority. The layout details submitted in compliance with Condition 1 shall define the boundaries of such areas, their proposed use, the items of equipment, means of enclosure and all other structures to be installed. The development shall be carried out and maintained in accordance with the approved details.
14. No development shall be carried out unless and until a schedule of materials and finishes and samples of such materials and finishes to be used for external walls and roofs of the proposed buildings have been submitted to and approved by the Local

Planning Authority and the materials so approved shall be used in the construction of the development.

15. No development shall take place until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details of the following matters: · the anticipated number, frequency and types of vehicles used during construction, the method of access and routing of vehicles during construction, the parking of vehicles by site operatives and visitors, the loading and unloading of plant, materials and waste, the storage of plant and materials used in construction of the development, the erection and maintenance of security hoarding, the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders), details of public engagement both prior to and during construction works.
16. No operational or construction vehicles shall be operated on the site except between the hours of: 07.00 and 19.00 on Mondays to Fridays inclusive, 07.00 and 13.00 on Saturday and not at any time on Sundays or Public Holidays.
17. Prior to the commencement of construction works on each phase of the development of any preparatory works, a detailed ecological enhancement scheme (which shall include the installation of bat boxes throughout the site) shall be submitted to the local planning authority for approval and shall be based on the recommendations within the supporting ecological statement. All approved details shall then be implemented in full and in accordance with the agreed timings and details.
18. No vegetation clearance works shall take place within the bird nesting season (between 1 March and 31 August inclusive) in any year unless a nesting bird check is carried out. This shall, be undertaken by a suitably qualified ecologist immediately prior to the works taking place. If any active nest sites are identified, these nests shall remain undisturbed until all the young have fledged naturally.
19. At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low-carbon energy sources or equivalent fabric first standards that would secure a 10% reduction in energy use. Details and a timetable of how this is to be achieved, including details of physical works on site, shall be submitted to and approved in writing by the local planning authority as a part of the reserved matters submissions required by condition 2. The approved details shall be implemented in accordance with the approved timetable and retained as operational thereafter.

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20. No development shall take place until a street lighting scheme has been submitted to and approved in writing by the Local Planning Authority. The street lighting shall be provided in accordance with the approved scheme.
21. The development shall not commence until the access serving the development has been constructed in accordance with the approved Drawing No X including visibility splays. Once provided, the splays shall thereafter be retained and kept free of all obstructions of a height of 0.6 metre above the adjoining carriageway level
22. No part of the development shall be first occupied until covered and secure cycle parking spaces for that part of the site have been provided in accordance with plans and details to be submitted to and approved by the local planning authority. The approved spaces shall thereafter be retained at all times for their designated purpose.
23. No part of the development shall be occupied until the Travel Plan dated X is implemented as specified within the approved document.