



ST. MARY'S PARK YAPTON

Planning Summary Planning Statement & Design & Access Statement

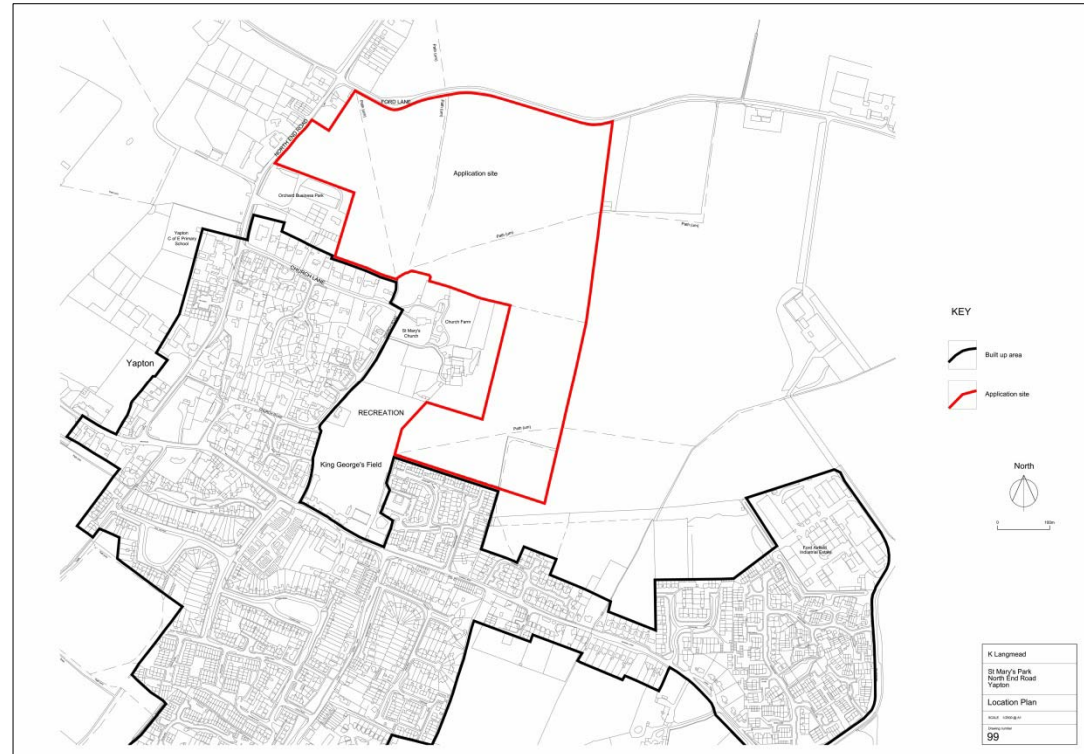
Prepared by Paul Collins BA (Hons) DipTP MRTPI on behalf of the Applicant Mr K Langmead November 2013



INTRODUCTION

The purpose of this Statement is to describe and summarise the submitted application and its supporting documentation and assess the planning policy context within which it should be determined.

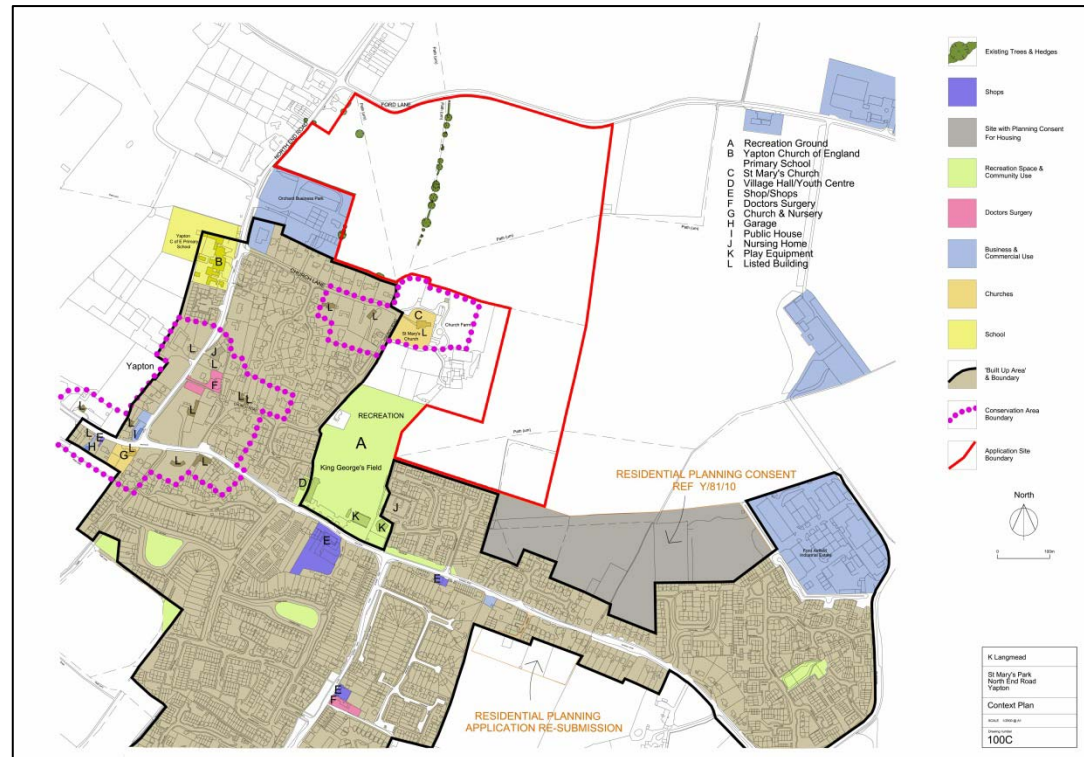
The application is an outline planning application which has been prepared and submitted in accordance with the procedures set out in the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 3) Order 2012 and this Statement has been prepared in accordance with the Councils Local validation requirements.



APPLICATION SUMMARY

The application is submitted in outline with the layout, appearance, scale, landscaping and the means of access for the development proposed reserved for later approval.

Outline planning permission is, therefore, sought for the principle of developing the application site with 9.3 Hectares (22.9 Acres) of residential development together with associated formal public open space, play areas and landscaping and 16.1 Hectares (39.7 Acres) of publically accessible informal parkland together with green pedestrian/cycle corridors and landscape buffers.



APPLICATION SUMMARY (continued)

Notwithstanding the outline nature of the application (and the lack of any statutory requirement to do so) the application has been supported by Indicative plans which show one way in which the site could be developed with the specified land areas in a sustainable, beneficial and satisfactory manner. The submitted plans are:

Topographical Site Surveys

Drg 99 - Location Plan

Drg 102B – Indicative Layout Plan

These indicate how the 20.4 hectare site could accommodate up to 250 dwellings together with associated roads, footpaths, cycle routes, formal open space and landscaping to the Councils adopted standards on 9.3 hectares of the site (Areas A & B) with the remainder of the site (16.1 hectares) being given over to publically accessible informal parkland together with green pedestrian/cycle corridors and landscape buffers.



APPLICATION SUMMARY (continued)

In addition the following reports have been prepared on the applicants behalf by independent Specialist Consultants:

Transport Assessment (Motion), **Tree Survey and Assessment** (PJC Consultancy) and an **Extended Phase 1 Habitat Study** (Corylus Ecology). Based on these reports and other assessment work, Strutt and Parker LLP have also prepared and submitted the following documents on behalf of the applicant:

Statement of Community Involvement: This describes the applicants efforts to engage in a dialogue with the local community and its representatives prior to the submission of this application and the outcome of this prior consultation.

Design and Access Statement: This has been prepared to meet the statutory requirement (The Town and Country Planning (Development Management Procedure) (England) (Amendment) Order 2013) for applications of this type to be accompanied by a statement about the design principles and concepts that have been applied to the development; and how issues relating to access to the development have been dealt with based on the advice and recommendations in the Transport Assessment.

Sustainability Statement: This assesses the context of the application site, the social, economic and environmental benefits of the scheme proposals and therefore the sustainability credentials of the development proposed

Strategic Landscape, Public Open Space and biodiversity Statement: Which highlights how these matters have been addressed based on the advice and recommendations provided by the Tree Survey and Assessment Report and Phase 1 Habitat Study (prepared by other Independent Consultants) and also submitted in support of the application.

Flood Risk and Foul/surface water drainage Strategy: Which assesses the potential level of flood risk and sets out at strategy for minimising that risk and a strategy for providing foul and surface water drainage for the development proposed (to the extent that this is possible given the outline nature of the application).

Heritage and Archaeology Statement: This assesses the potential impact of the appeal proposals on heritage and archaeological assets and how those impacts will be avoided and/or mitigated.

PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:- "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise." Therefore as a matter of law the starting point for assessing any application is the current development plan and its policies.

The Development Plan

Following the revocation of the former South East Plan 2009 in March 2013 the development plan for this district now comprises only those relevant policies in the Arun District Local Plan 2003 "saved" for use beyond 2007. In this case the relevant policies are considered to be GEN2 "Built-up Area Boundary", GEN3 "Protection of the Countryside", GEN 5 Provision of New Residential Development, GEN7 "The Form of New Development", GEN 8 "Development and the Production of New Infrastructure", GEN9 Foul and Surface Water Drainage, GEN 14 Public Transport, GEN 15 Cycling and Walking, GEN 20 Provision of Public Open Space within New Development, AREA 2 Conservation Areas and DEV 17 Affordable Housing.

Other material considerations

The appeal site lies outside of the built up area of Yapton as defined by "saved" Local Plan Policy and is in the countryside defin

CONTENTS

Introduction

Executive Summary

The Application Site and its surroundings (Physical Context)

The Application and the Proposals

Planning Policy Context

Design Principles & Concepts

Scheme Benefits

Scheme Impacts

Conclusions

APPENDICES

Appendix 1: Affordable Housing Statement

Appendix 2: Flood Risk Assessment & Drainage Statement

Appendix 3: Archaeology & Heritage Statement

Appendix 4: Landscape & Public Open Space Statement

Appendix 5: Delivery Statement

Executive Summary

The Application Site comprises two small arable fields to the north and east of the sustainable settlement of Yapton and extends to approximately 25.4 hectares (circa 62.7 acres) in area. The site lies outside the currently defined built up area of Yapton but is closely related to the settlement with good footpath links to and from the settlement and vehicular access to the site is via Ford Lane.

The application is submitted in outline with all matters except for the means of access reserved for later approval in the event that outline planning permission is granted and proposes the following:

- **A sustainably located housing development of up to 250 dwellings (up to 75 (30%) affordable housing) together with formal open space/play areas with vehicular access from Ford Lane.**
- **14.9 hectares of publicly accessible parkland, green infrastructure corridors and landscaped areas. These areas will create and provide wildlife habitats, improve the landscape features of the area, defensible green buffers around the settlement, the Conservation Area and the Church and informal recreation areas for existing/future residents and ease of access to the open countryside.**
- **A parkland housing development that will boost the supply of new homes to meet acknowledged housing needs in a way that extends the existing village following the principles of Garden Cities as envisaged at Framework Paragraph 52 and in a manner that accords with the aims set out at Framework Paragraphs 69, 70 and 73. The scheme will maximise the economic, social and environmental benefits of such development whilst minimising its adverse impacts.**

The submitted proposals represent a demonstrably sustainable and beneficial form of development that will serve to meet the affordable and open market housing needs of Yapton for the next 20 years and make a much needed contribution to boosting the supply of housing land in Arun District generally.

The proposals demonstrate compliance with “saved” Local Plan Policies GEN7 “The Form of New Development”, GEN 8 “Development and the Provision of New Infrastructure”, GEN 9 “Foul and Surface Water Drainage”, GEN 14 “Public Transport”, GEN 15 “Cycling and Walking”, GEN 20 “Provision of Public Open Space within New Development”, DEV 17 “Affordable Housing” and AREA 2 “Conservation Areas” and the acknowledged conflict with “saved” Local Plan Housing Policies GEN 2, GEN 3 and GEN 5 should be considered in the light of the Presumption in Favour of Sustainable Development at Framework Paragraph 14.

In this regard the outline planning permission sought should be granted as:

- the relevant housing policies in the development plan are absent, silent and out of date as the Local Plan expired in 2011 and the Council is unable to demonstrate a 5 year supply of deliverable housing sites
- there are no adverse impacts which would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole and
- no specific policies in the Framework indicate that development should be restricted

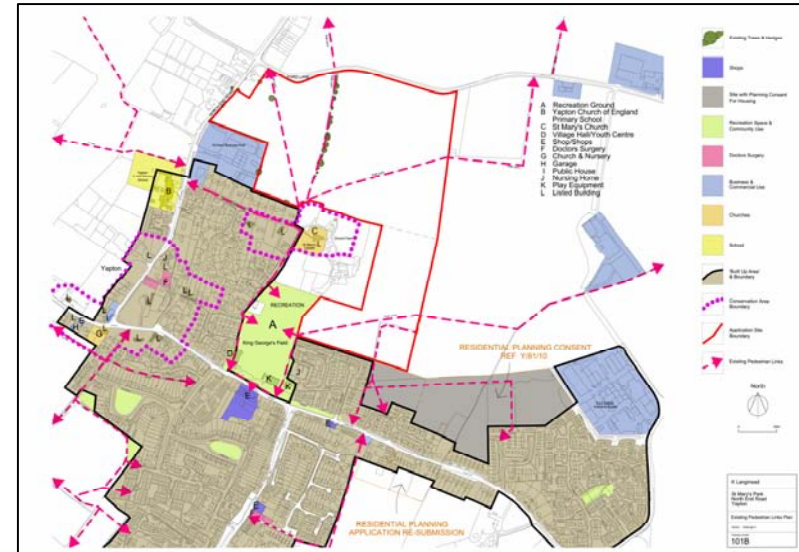
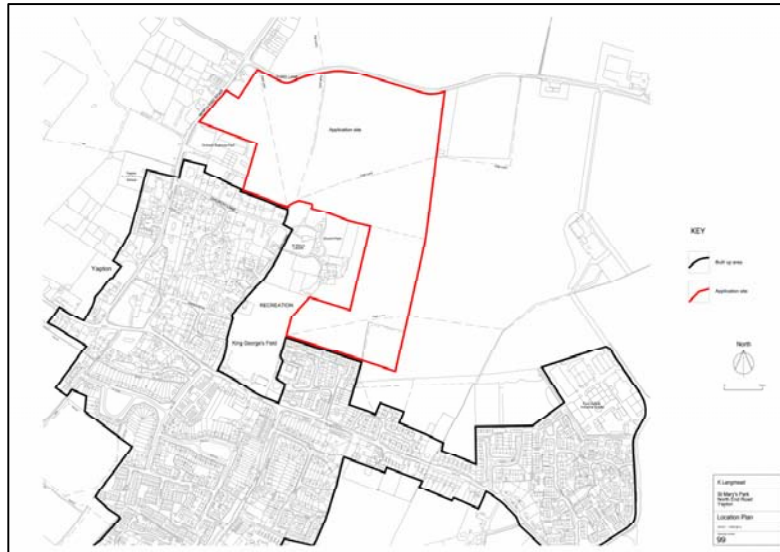
Introduction

1. We believe that this site offers an exciting opportunity to increase the Housing Land supply in Arun District and provide housing to meet the open market and affordable housing needs of Yapton for the next 20 years.
2. This Statement meets the requirements set out in the Town and Country Planning (Development Management Procedure) (England) (Amendment) Order 2013 which came into force on 25th June 2013 by providing a Statement about the design principles and concepts that have been applied to the development; and how issues relating to access to the development have been addressed. The Statement also provides an explanation of the submitted application and the proposals, describes the application site and its surroundings, explains the policy context for the determination of the application and an explanation of the many benefits of the scheme and how these will be delivered together with an assessment of the scheme impacts and how these can be mitigated.
3. The Appendices comprise Statements submitted so as to meet the Council's local validation requirements and these should be read alongside the independently prepared and submitted Transport Assessment (Prepared by Motion), Extended Phase 1 Habitat Study (Prepared by Corylus Ecology), Arboricultural Survey and Report (Prepared by PJC Consultancy) The Council's completed "Biodiversity checklist" prepared and submitted for the same reason.

The Application Site and its Surroundings (Physical Context)

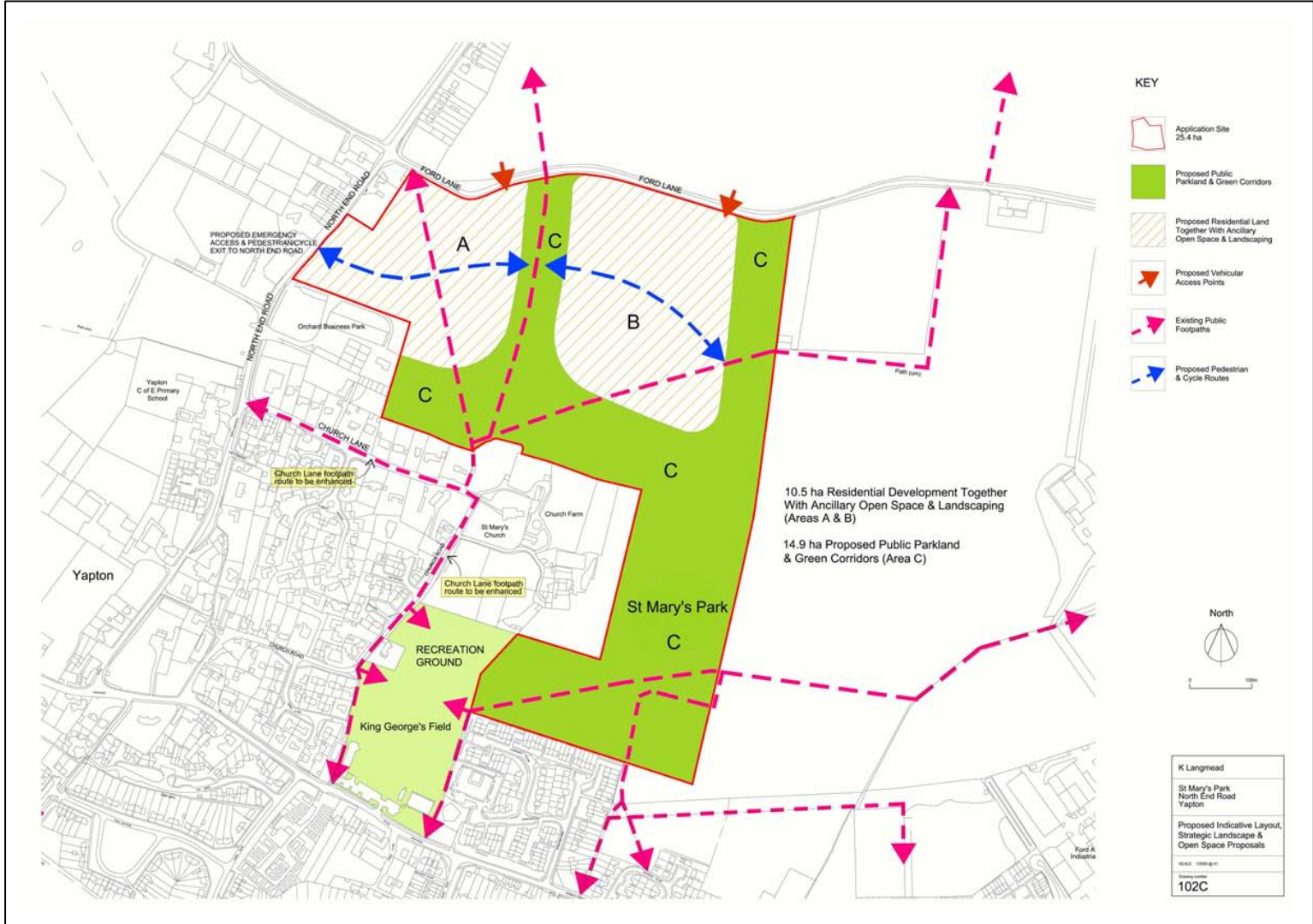
4. The Application Site comprises two small fields to the north and east of Yapton and extends to approximately 25.4 hectares (circa 62.7 acres) in area.
5. Like most of the land outside the settlement boundary of Yapton, the site comprises Grade 2 Agricultural Land currently in use for arable crop farming.
6. The fields are relatively small for modern farming requirements and do not represent the best and most versatile agricultural land available in the area and their use for agriculture make a very limited contribution to the local economy.
7. The fields are physically and visually divorced from the larger and more open and less contained arable fields in the same family ownership which lie to the east and on the north side of Ford Lane as the site is bounded by built development and associated recreational land on 3 sides with the 4th side (eastern boundary) being well defined by an existing public footpath and tree line which separates the site from the arable fields and buildings on the remnants of the former Ford Airfield to the east.
8. The historical core of Yapton centred on St Mary's Church and its associated Church Lane Conservation area is situated to the south and west of the site and footpaths (FP 357, 358 and 359) lead from this part of the settlement across the site and into the more open countryside beyond Ford Lane.

9. The site is devoid of any significant landscape features and is not subject to any specific landscape or nature conservation designations. The Extended Phase 1 Habitat Study (prepared by Corylus Ecology) and the Arboricultural Survey and Report (prepared by PJC Consultancy) conclude that the site is largely devoid of ecological interest with potential habitats restricted to the field margins where the existing trees are of varying quality and health.
10. Vehicular access to the fields is achieved via Ford Lane and although the fields lie outside of the currently defined built up area boundary of Yapton, the site is well connected to the settlement through existing public footpaths across the site which connects to existing footpaths through the settlement itself.



The Application and the Proposals

11. The application is an outline planning application which has been prepared and submitted in accordance with the procedures set out in the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 3) Order 2012.
12. Outline planning permission is sought for the principle of developing the site with:
 - 10.5 hectares of residential development (comprising up to 250 dwellings (30% to be affordable) together with ancillary open space and landscaping)
 - 14.9 hectares of public open space development to be laid out as public parkland and landscaped green corridors
 - Vehicular access from Ford Lane (The means of access)
13. All other matters (layout, scale, appearance and landscaping) are reserved for later approval so that the only issues for determination at this stage are the principle of developing the site with the elements proposed and the means of access from Ford Lane and it is anticipated that all other matters of detail (including public open space provision, the proposed pedestrian and cycle links and off-site highway works) form part of the reserved matters and can, therefore, be controlled through the imposition of controlling conditions and/or the use S106 planning obligations in the event that the principle of the development proposed is considered to be acceptable.



Planning Policy Context

Overview

14. For all the reasons set out and explained in this section the principle of developing the application site in the manner proposed falls to be determined in accordance with the presumption in favour of sustainable development set out at paragraph 14 of the National Planning Policy Framework which states that:

*“At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*

*For **decision-taking** this means:*

- *approving development proposals that accord with the development plan without delay; and*
 - *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted”*
15. The development plan for this district is absent, silent or relevant policies are out of date and for the reasons given throughout this statement there are no adverse impacts which significantly or demonstrably outweigh the benefits of the development proposed and no specific p [policies in the framework indicate that the development proposed should be restricted.

The law

16. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states: - "If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."
17. Therefore, the main issue in this case is whether the principle of the development proposed is acceptable having regard to all relevant development plan policies and other material considerations.

The Development Plan

18. Following the revocation of the former South East Plan 2009 in March 2013, the statutory development plan for this district for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 now comprises the Arun District Local Plan adopted in 2003 alone (ADLP). The ADLP was adopted in 2003 with a base date for the purposes of housing policy of 1996 and an end date of 2011. The Planning and Compulsory Purchase Act 2004 required that the 2003 Local Plan be replaced with a new local development framework by 2007 but this never took place so the, then, Secretary of State issued a direction which enabled a number of the ADLP Policies to be "saved" for use beyond 2007. Policies which were not "saved" no longer form part of the development plan. Those policies "saved " for use beyond 2007 which are relevant in this case are considered to be:

GEN 2 “Built-up Area Boundary”, GEN 3 “Protection of the Countryside”, GEN 5 “Provision of New Residential Development”, GEN 7 “The Form of New Development”, GEN 8 “Development and the Provision of New Infrastructure”, GEN 9 “Foul and Surface Water Drainage”, GEN 14 “Public Transport”, GEN 15 “Cycling and Walking”, GEN 20 “Provision of Public Open Space within New Development”, DEV 17 “Affordable Housing” and AREA 2 “Conservation Areas”.

19. The application site is not identified for housing development in “saved” policy GEN 5 and lies outside (but abutting) the built up area boundary of the sustainable settlement of Yapton as defined in GEN 2 and is therefore in the countryside for the purposes of GEN 3. Therefore, the submitted proposals do not accord (as a matter of principle) with the overall housing requirement, location and delivery strategy of the adopted development plan.
20. The “**Affordable Housing Statement**” at **Appendix 1** explains that 30% of the proposed housing (up to 75 dwellings) would be affordable housing in accordance with “saved” ADLP Policy DEV 17 Affordable Housing as amended by the Council’s later Interim Statement and the proposals therefore accord with the development plan in this regard.
21. It is considered that subject to the imposition of suitably worded controlling conditions on any outline planning permission granted the submitted proposals accord with “Saved” ADLP Policy GEN 7 “The Form of New Development” (to the extent that this is possible given the outline nature of the application submitted).
22. The Council has not adopted any Supplementary Planning Guidance or Supplementary Planning Document which details the specific infrastructure or contributions that it would seek for a development of the type proposed in accordance with “Saved” ADLP Policy GEN 8 “Development and the Provision of New Infrastructure”. Nor has the Council adopted any Charging Schedule under the Community Infrastructure Levy Regulations 2011 (as amended)

so there is no information available as to what the Council may seek in this regard. However, the applicant will consider any fair and reasonable requests made by the Council in respect of the provision of, or contribution towards the cost of infrastructure, service or amenity provision (as defined in the policy) and subject to these requests complying with CIL Regulation 122 will meet those requests through S106 Planning Obligations. Therefore there is no reason to assume that the submitted proposals would not accord with this “saved” development plan policy.

23. The “***Flood Risk Assessment and Drainage Strategy***” at **Appendix 2** demonstrates that the site lies in any area where the risk of flooding from all sources (pluvial, the sea and ground water) is minimal and there is no reason why satisfactory foul and surface water drainage cannot be provided in accordance with standard conditions imposed on any outline planning permission granted so as to ensure that the proposed development will not give rise to any increased risk of flooding within the site or to adjoining development. Therefore no conflict with “saved” ADLP Policy GEN 9 will arise.
24. In a recent appeal decision (**Appeal Ref: APP/C3810/A/11/2155343 (Council Reference Y/81/10) Land north of Burndell Road, Yapton, BN18 0HR**) the Inspector found that “*Yapton has a reasonable range of essential facilities and employment opportunities*” and that “*In addition, it is quite well served by public transport*”. Moreover, neither West Sussex County Council nor Arun District Council has identified any specific improvements to public transport in and around Yapton that are necessary or sought and recent Officer reports regarding recent proposals for sites elsewhere in Yapton have not identified any such requirements either. Therefore in our view (based also on the further work undertaken in the submitted Transport Assessment) Yapton is well served by public transport given its semi rural location and there is no necessity to make improvements to the existing public transport system

in order to make the development sustainable in these terms so no conflict arises with “saved” development plan policy GEN 14.

25. The proposed scheme has been designed (in principle) so as to maximise and enhance the provision of safe facilities for cyclists and pedestrians through the development and make linkages with the safe cycle and footpath networks within the surrounding area in accordance with the aspirations of “Saved” ADLP Policy GEN 15 “Cycling and Walking”.
26. The ***Landscape & Public Open Space Statement at Appendix 3*** demonstrates that the proposed scheme not only complies in full with “Saved” ADLP Policy GEN 20 “Provision of Public Open Space within New Development” in terms of the new development meeting its own needs in this regard. Outline Planning Permission is also sought so as to create an additional 14.9 hectares of informal park land open space and green infrastructure corridors that would complement the formal recreational space available on the existing recreation ground. This would provide an attractive informal open space for the permanent and long term use of existing and future residents of Yapton and also help to meet “saved” development plan policy AREA 2 by preserving and enhancing the setting of the Church Lane Conservation Area and St Mary’s Church by cocooning both within an inalienable area of public open space.
27. In summary, the submitted proposals accord with all relevant “saved” development plan policies except for “saved” local plan policies GEN 2, GEN 3 and GEN 5 due to the site being located outside of the defined built up area boundary and therefore in the countryside for the purposes of the development plan. In this regard it is, therefore, necessary (due to the legal requirement in S38 (6) of the Act) to assess the other material considerations that combine to indicate that the submitted application should be determined otherwise than in accordance with this aspect of the development plan.

Other Material Considerations

The National Planning Policy Framework (“The Framework”)

28. The Framework was published in March 2012 and it replaced all previous relevant Government planning policy on which the adopted Development Plan and its policies were prepared.
29. Framework Paragraphs 210 – 216 describe how the Government expects the Framework and its policies to be implemented by Local Planning Authorities and in particular paragraphs 210 – 215 state that:

210: Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

211. For the purposes of decision-taking, the policies in the Local Plan (and the London Plan) should not be considered out-of-date simply because they were adopted prior to the publication of this Framework.

212. However, the policies contained in this Framework are material considerations which local planning authorities should take into account from the day of its publication. The Framework must also be taken into account in the preparation of plans.

213. Plans may, therefore, need to be revised to take into account the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan.

214. For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework.

215. In other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

30. Framework paragraph 197 states that: *“In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development”.*
31. Paragraph 13 of the still extant “The Planning System: General Principles” document states that: *“The Courts have also held that the Government’s statements of planning policy are material considerations which must be taken into account, where relevant, in decisions on planning applications. These statements cannot make irrelevant any matter which is a material consideration in a particular case. But where such statements indicate the weight that should be given to relevant considerations, decision makers must have proper regard to them. If they elect not to follow relevant statements of the Government’s planning policy, they must give clear and convincing reasons (E C Grandson and Co Ltd v SSE and Gillingham BC 1985)”.*
32. Framework Paragraph 6 states that: *“The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”* and Framework Paragraphs 7 and 8 state that there are three mutually dependant dimensions to sustainable development which give rise to the need for the planning system to perform the following roles:

- ***an economic role*** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- ***a social role*** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
- ***an environmental role*** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

33. Framework Paragraph 14 states that: *“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development (PIF), which should be seen as “a golden thread running through both plan-making and decision-taking”* and goes on to state what this means for plan making and decision taking.

34. For decision-taking the PIF means:

“approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.”*

35. Framework paragraphs 47 and 48 set out the Governments expectations that Local Planning Authorities should significantly boost the supply of housing in their areas so as to facilitate housing growth in the short, medium and longer term.
36. In the short term local planning authorities are obliged to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period). Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
37. Framework paragraph 49 states that “*Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites*”.
38. The acknowledged conflict (as a matter of principle) between the submitted proposals and “saved” ADLP Policies GEN 2, GEN 3, and GEN 5 should therefore be considered in this context.

39. Successive appeal decisions for housing sites throughout Arun District since 2008 have held that “saved” ADLP Policies GEN 2, GEN 3 and GEN 5 are out-of-date and since the Local Plan had an end date of 2011 relevant development plan policies are also absent or silent and provide no meaningful guide for the determination of housing proposals for the period from 2011 onwards.
40. Moreover successive appeal decisions since 2008 have also held that the Council is unable to demonstrate a 5 year supply of deliverable housing sites with a number of these declaring that the available supply is estimated to be somewhere between 3.7 and 4.6 years against the Framework compliant requirement for there to be either a 5.25 year (5% buffer) or 6 year (20% buffer) supply depending on varying views as to whether or not there has been persistent under delivery in the district for the purposes of Framework paragraph 47.
41. It is therefore self evident that as a matter of principle the submitted application falls to be determined in accordance with the “Presumption in favour of sustainable development at paragraph 14 of the Framework.

The Emerging Draft Local Plan

42. Framework paragraph 216 states that *“From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:*
 - *the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
 - *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*

- *the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)”.*

43. A Draft replacement Local Plan (based on an emerging evidence base) setting out (amongst other matters) draft proposals for the quantum of housing to be provided and location of housing sites in the district necessary to meet housing needs from 2011 – 2029 and beyond was published for public consultation in 2012.
44. Following consideration of the representations received and further evidence base preparation, a revised draft Local Plan for the period 2011 – 2029 and beyond was published in April 2013 for the consideration of members in the May 2013 Committee cycle. According to the relevant Committee papers and officer reports, the purpose of this Revised Draft was for it to be approved by members for public consultation over the summer (Regulation 19/20 Stage) with submission to the Secretary of State (Regulation 22 stage) in December 2013 so that an examination (Regulation 24 Stage) could take place with adoption anticipated in spring/summer 2014.
45. However, at a Full Council meeting on 29 May 2013 members rejected the Draft Local Plan as proposed thereby leaving all (Council Officers, Town and Parish Councils, landowners, developers and development professionals operating in the district and the public generally) uncertain as to the Council’s intentions regarding the content and likely timetable leading to the adoption of the much needed replacement Local Plan.
46. At the date of writing (and notwithstanding the machinations of the Council’s Local Plan Sub Committee on 31 October 2013 and the further meetings planned for late November 2013 and beyond) these matters remain unresolved and unclear. Therefore the only certain fact is that the Draft Local Plan has not been progressed to the

point where it can or should carry anything but very limited weight in the determination of submitted applications for housing in accordance with Framework paragraph 216.

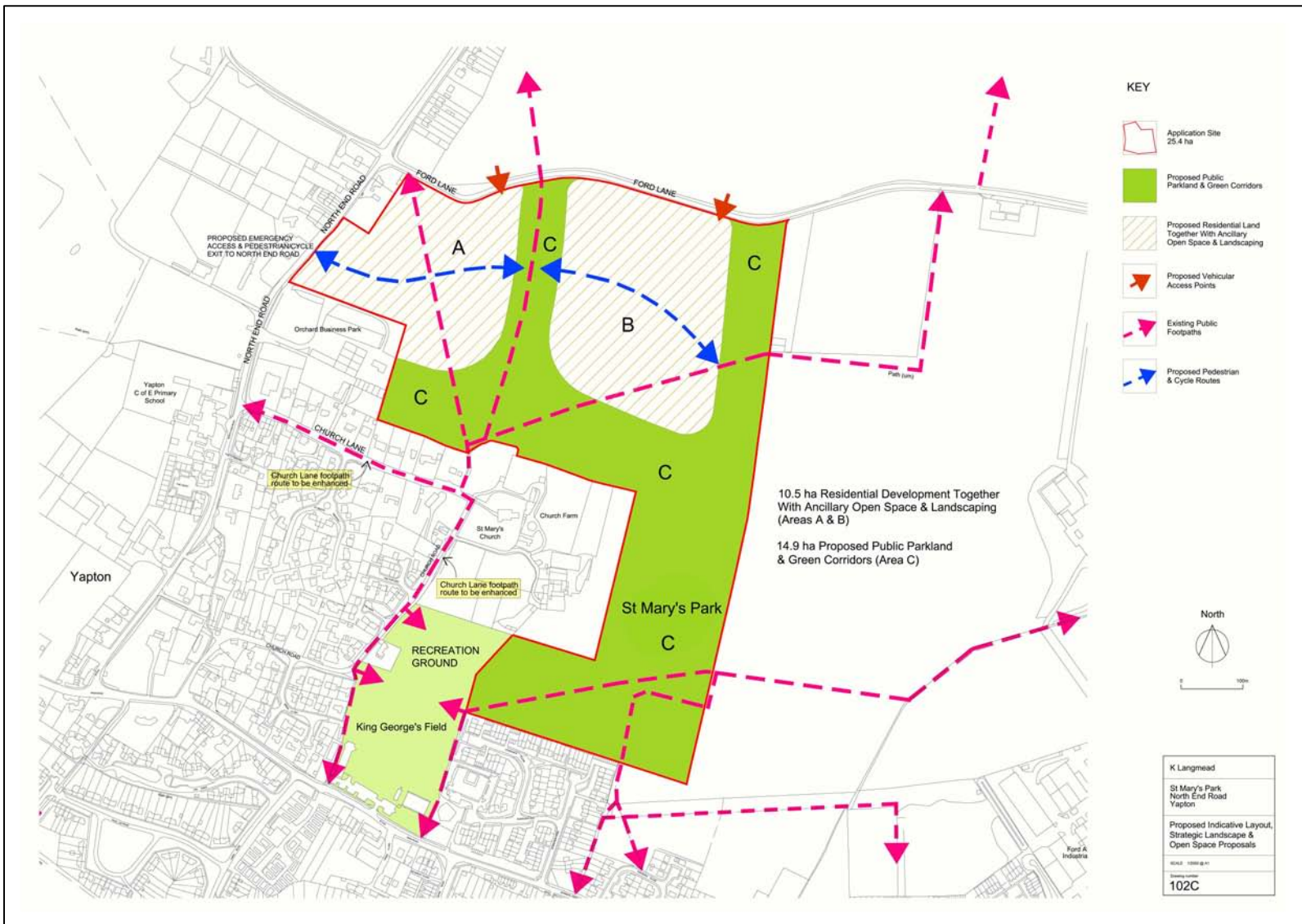
The Emerging Yapton Neighbourhood Plan

47. 'Yapton Parish' was designated by Arun District Council as a Neighbourhood area under Section 61G of the Town and Country Planning Act 1990 in December 2012 and an established Yapton Neighbourhood Plan Group has commenced the preparation of a Neighbourhood Plan (YNP) in accordance with the Neighbourhood Planning (General) Regulations 2012. 68.
48. Understandably, the initial preparation work has focused on setting out a number of key objectives for the YNP based on the Neighbourhood Plan Groups understanding of the Arun District Council's emerging replacement Local Plan with particular emphasis on the 2012/2013 Draft Local Plan intention that the parish need only make provision to accommodate a minimum of 100 dwellings from 2013 onwards.
49. Given paragraphs 37 – 41 above the Groups faith in the certainty of Arun District Council's intentions in this regard has proven to be somewhat misplaced as it is clear that the decision making of Arun District Council makes it highly likely that Yapton Parish will need to accommodate more than 100 dwellings as part of its contribution to addressing the acknowledged shortfall of Housing land to meet the needs (both open market and affordable housing) of the district as a whole particularly as a Neighbourhood Plan must follow the direction given by the Strategic Local Plan in this regard and this has yet to be determined.
50. Clearly as Yapton is one of the largest and most sustainable settlements in the District it should be identified as being a settlement where some of the district wide shortfall in open market and affordable housing should be

addressed but in view of the foregoing the emerging Neighbourhood plan is at a very early embryonic stage and will remain so for the foreseeable future due to the vagaries of the emerging Arun District Local Plan and therefore the weight that can be attached to same in the context of determining submitted applications is extremely limited. (See Framework Paragraph 216).

Design Principles and Concepts

51. As explained throughout this Statement and its Appendices the application is submitted in outline with all matters except for the means of access reserved for later approval so that design principles are not applicable but conceptually the proposals seek to provide for;
- **A sustainably located housing development of up to 250 dwellings (up to 75 (30%) affordable housing) together with formal open space/play areas and appropriate S106 Financial contributions towards the provision of local infrastructure.**
 - **14.9 hectares of publicly accessible parkland, green infrastructure corridors and landscaped areas in order to create wildlife habitats, improve the landscape features of the area, defensible green buffers around the settlement, the Conservation Area and the Church, informal recreation areas for existing/future residents and provide ease of access to the open countryside.**
 - **A parkland housing development that will boost the supply of new homes to meet acknowledged housing needs in a way that extends the existing village following the principles of Garden Cities as envisaged at Framework Paragraph 52 and in a manner that accords with the aims set out at Framework Paragraphs 69, 70 and 73 so as to maximise the economic, social and environmental benefits of such development whilst minimising its adverse impacts.**



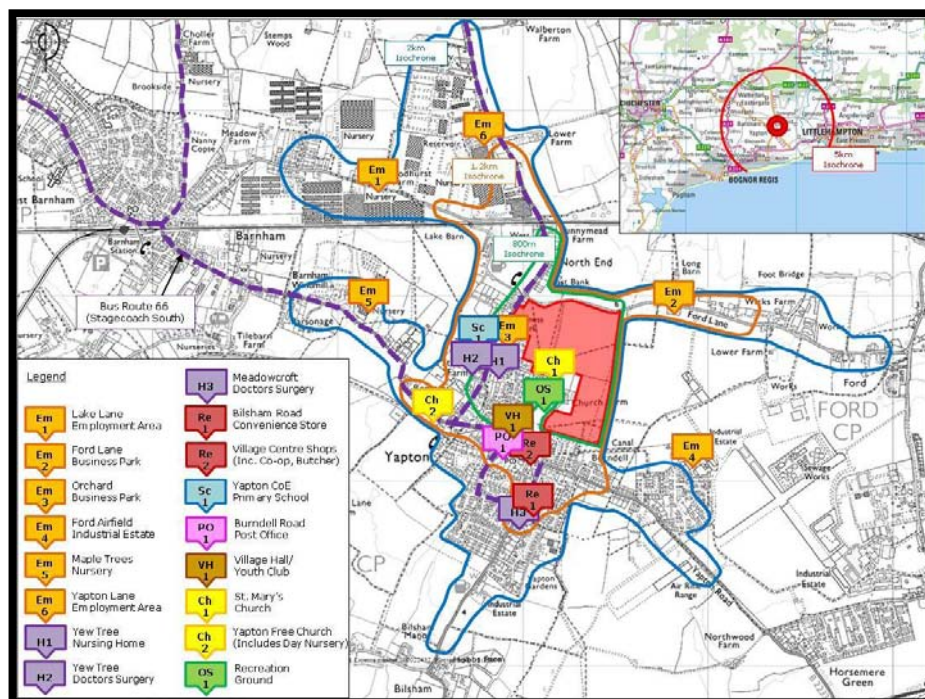
Accessibility and Transport sustainability

52. The independent Transport Assessment (TA) submitted carefully assesses all these matters and explains in detail how in accordance with paragraph 32 of the Framework and relevant “saved” development plan policies, the submitted proposals have been carefully designed to ensure that :

- the opportunities for sustainable transport modes have been taken up given the nature and location of the site so as to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Therefore, in accordance with Framework this development should not be prevented or refused on transport grounds since the residual cumulative impacts of the development would be minimal and certainly not severe.

53. The TA demonstrates that the application site is well related to the sustainable settlement of Yapton and that future residents would have ease of access by cycle or on foot to the good range of local services and facilities and that local bus services that it provides.



54. Notwithstanding, the already good cycle and pedestrian links between the site and the settlement will be improved and enhanced with the expectation that such improvements and enhancements could be secured through S106 Planning Obligations and/or conditions if considered appropriate and necessary.

55. Based on careful analysis and assessment the Access and Movement Strategy for the proposed development is set out at paragraphs 4.3 – 4.8 of the TA The strategy has 3 main aims:

Destination	Distance (metres)	Typical Journey Times (minutes)		
		Foot	Cycle	Bus/Train
Public Transport Interchanges				
North End Road Bus Stops	300	4	1	N/A
Bilsham Road Bus Stops	1,200	15	4	N/A
Barnham Railway Station	3,200	40	10	15
Community Facilities				
St Mary's Church	360	5	1	N/A
Village Hall/Youth Centre (incl. Recreation Ground)	750	9	2	N/A
Health Facilities				
Yew Tree Doctor's Surgery	800	10	3	N/A
Dentist, Walberton	2,500	31	8	N/A
Local Employment Opportunities				
Orchard Business Park	520	7	2	N/A
Lake Lane Employment Area	1,750	22	6	N/A
Ford Airfield Industrial Estate	2,400	30	8	N/A
Rudford Industrial Estate	4,000	N/A	13	N/A
Education Facilities				
Yapton C of E Primary School	610	8	2	N/A
Yapton Free Church and Nursery	1,100	14	4	N/A
Phillip Howard Catholic High School	3,720	N/A	12	17
Westergate Community School	5,700	N/A	18	24
Local Retail Outlets				
Village Centre Shops (incl. Co-op)	800	10	3	N/A
Olive Branch Public House	950	12	3	N/A
Lee Side Tool Shop	1,050	13	3	N/A
Bilsham Stores	1,200	15	4	N/A
Key Local Centres				
Littlehampton (by bus from Bilsham Road)	7,100	N/A	22	30
Bognor Regis (by bus from Bilsham Road)	9,200	N/A	29	35
Bognor Regis (by bus from North End Road and train from Barnham)	9,201	N/A	29	38
Chichester (by bus from North End Road and train from Barnham)	16,000	N/A	50	36
Table 3.5 – Typical Journey Times to Key Local Services				

Table 3.5 – Typical Journey Times to Key Local Services

- To facilitate vehicular access to and from the proposed development in a way that ensures that vehicles attracted by the development or leaving the development do not have to travel through the village
- To enhance and improve access to sustainable transport modes so that choosing sustainable Transport modes is a realistic and attractive option for future residents.
- To encourage future residents to make the choice to travel by sustainable transport modes (for short journeys in particular) as an alternative to the use of the private car for such trips.

The Means of Access

56. The means of access (which forms part of the submitted application) is to be via two new vehicular junctions onto Ford Lane (designed with reference to the guidance in TD42/95 of the Design Manual for Roads and Bridges (DMRB) and subjected to a satisfactory Stage 1 Safety Audit) so as to facilitate vehicular access to the development whilst also discouraging future residents and/or visitors arriving by vehicle from accessing the development via Yapton village. The proposed vehicular accesses are shown on the Motion Drgs numbers 130431-02a (Proposed Western Site Access) and Drg 130431-03a (Proposed Eastern Site Access) submitted within the TA at Appendix H and these are designed to allow vehicles to access or exit the development via the existing main road routes entering and leaving the village from the west, north and east.
57. It is anticipated that the detailed design for these two access junctions would be finalised in conjunction with the proposed layout and landscaping arrangements proposed at detailed application stage in accordance with standard conditions imposed on any outline planning permission granted.

Sustainable Transport Strategy and related Enhancements and Improvements

58. The proposed internal road layout is a reserved matter and will be subject to further design at the reserved matters stage but it is intended that the internal roads will be designed in accordance with relevant guidance so that no diversions of the existing public rights of way that traverse the proposed housing areas (FP 357 AND 359) will be necessary and so that FP 358 that will divide these areas can be retained, enhanced and incorporated into an enlarged and landscaped green corridor (*"Landscape and POS Statement at Appendix 4"*). In this way it is proposed that the potential for the existing footpaths that cross the site to provide routes between the site and Yapton recreation ground, including Church Road, is maximised and made attractive for pedestrians and cyclists alike. In this regard it is noteworthy that existing traffic flows in Church Road are such that the relevant guidance notes that shared surfaces are likely to work well across small distances within the road.

59. For similar reasons, it is proposed that a new access reserved for pedestrians and cyclists only is provided from the site onto North End Road and although the precise location of this access will be fixed at the reserved matters stage having regard to the proposed layout plan, this will supplement the existing public rights of way that cross the site and ensure that residents are able to access the bus stops, the Ford Airfield and Rudford industrial estates for potential employment opportunities and Yapton Primary School via the proposed pedestrian refuge island shown on Motion Drawing 130431-04. The pedestrian/cycle access onto North End Road could also be used by emergency vehicles in the unlikely event that both of the proposed accesses on Ford Lane are blocked and to this end could be designed to accommodate the swept path of fire tenders and ambulances and incorporate retractable bollards, or other similar device, to ensure non-emergency vehicles are prevented from using this access.

60. As part of the Stage 1 Road Safety Audit reference was made to the fact that the northbound bus stop on North End Road was subject to some limitations that have the potential to reduce the attractiveness of using the buses that serve this stop. On this basis, it is proposed that the existing bus stops that are located on North End Road will be relocated as is shown on Motion Drawing 130431-05 at TA Appendix I. When identifying the location of these stops reference has been made to the potential desire lines for future residents and the availability of highway land to accommodate bus shelters.
61. Finally in this regard a Residential Travel Plan is proposed so as to encourage future residents to use sustainable transport modes when traveling to and from work and this is detailed at Section 7 of the TA.

Scheme Benefits

Economic Benefits

62. Section 143 of the Localism Act makes it clear that defined financial "benefits" (significantly New Homes Bonus and CIL) can be taken into account in the determination of planning applications "where material to the application". and Framework paragraph 7 makes it clear that the planning system should fulfill an economic role by *"ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure"*.
63. In an ideal world *"ensuring that sufficient land of the right type is available in the right places and at the right time"* would be a role best fulfilled by an adopted Local Plan and subsequently a new Neighbourhood Plan but this plan led approach has thus far failed in Arun District and Yapton and is unlikely to succeed for some considerable time to come so that if Yapton is to benefit from the growth, innovation; and the provision of infrastructure that underpins economic recovery it will be necessary to find other ways of identifying sufficient land of the right type in the right place on which these things are dependent.
64. For all the reasons given throughout this Statement the application site is, considered to represent the sufficient quantum of land of the right type in the right place for Yapton and now is the right time to release the site for development.
65. The site is of a sufficient size to deliver the quantum of open market and affordable housing for the next 20 years which would make a significant contribution to the economic well being of the community. In the short, medium and long term.

66. In the short term the construction of the proposed development would inject a significant boost to the local economy providing local jobs as well as indirect and direct income for local building and constructions services and suppliers.
67. More significantly in the medium to longer term the development would inject a significant boost to local government finances in the form of the Governments “new home bonus”, additional Council taxes and CIL payments and/or S106 Planning Obligations that can be spent locally on the provision of a wide range of services and infrastructure to the benefit of the Community as a whole.
68. Even more significantly although many of the proposed houses (particularly the affordable housing) will provide choice and access to a wider range of homes than those which currently exist (many of whom may currently be part of existing households due to their age (young or old) and financial circumstances), new housing also attracts new economically active residents who will strengthen and widen the local employment base and generate increased local commercial expenditure which will support, maintain and enhance local services, shops and pubs.
69. These are all tangible, sustainable economic benefits which are material to the consideration and determination of any housing proposal and cannot and should not be dismissed or rejected out of hand.

Social Benefits

70. Framework paragraph 7 also makes it clear that the planning system should fulfill a social role by “*providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built*

environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being"

71. It is self evident that Arun District Council is currently unable to demonstrate a supply of housing to meet the needs of the district and that whilst Yapton has been identified as a sustainable settlement where some of those needs should be met there are insufficient identified sites available to meet future needs within or adjoining the settlement as all those identified to date are insufficient in size to deliver the quantum of housing required for the future.
72. Whilst recent planning permissions for sites in Yapton have increased the available supply these only serve to address the backlog of housing needs that have accumulated due to under delivery in the past and are insufficient to address the needs of the present or future generations particularly given the need for housing growth.
73. For all the reasons given throughout this Statement and in the other Statements in the Appendices it is considered that this site presents an ideal opportunity to create a highly accessible and high quality built environment for this part of Yapton in a way that reflects community needs and will make a significant contribution to the health, social and cultural well being of the Community for many years to come.

Environmental Benefits

74. Framework paragraph 7 also makes it clear that the planning system should fulfill an environmental role by ensuring that development makes a contribution towards "*protecting and enhancing our natural, built and historic environment*" thereby; helping to improve biodiversity by using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.

75. The submitted proposals have been carefully considered and prepared with these aims in mind and for all the reasons given throughout this statement and in the further statements set out in the Appendices and those submitted by independent Consultants, it is considered that the proposals represent a demonstrably sustainable form of development which will provide the much needed housing required in a way that will maximise the environmental benefits of such development as the Government envisages.
76. The proposed development is (as a matter of principle) a demonstrably sustainable form of development that will bring many Economic, Social and Environmental benefits against which any significant or demonstrable adverse impacts should be carefully weighed for the purposes of Framework Paragraph 14.

Scheme Impacts

77. In September 2013 the Applicant made a request for a Screening Opinion from Arun District Council under Part 2, Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 and the Council in concluding that no Environmental Impact Assessment was required the Council concluded that:

- The proposal is unlikely to cause significant pollution or nuisance which cannot be controlled outside of these regulations
- The site is not located within an environmentally sensitive location and no protective designations apply which could be affected by such development
- The likely impacts are unlikely to be of a scale or cumulative nature that would require a formal Environmental Impact Assessment; they can be adequately considered through the submission of stand-alone technical assessments.

78. In preparing the submitted application careful consideration has been given to the following potential impacts:

- Traffic and Highway Impacts (See submitted Transport Assessment)
- Flood Risk and Drainage Impacts (See Statement at Appendix 2)
- Landscape & Visual Impacts (See Statement at Appendix 3)
- Arboricultural Impact (See submitted Arboricultural Survey and Report)

- Heritage and Archaeological Impacts (See Statement at Appendix 4)
- Ecological and Habitat Impacts (See submitted Extended Phase 1 Habitat Study)
- The Impacts on existing Infrastructure and services (See Statement at Appendix 5)

79. Having undertaken this assessment it is concluded that there are no adverse impacts that cannot be mitigated through the use of suitably worded conditions and/or S106 Planning Obligations and none that would, in any case, significantly and demonstrably outweigh the many scheme benefits and no specific policies in the Framework which indicate that development should be restricted.

Conclusions

80. The submitted proposals represent a demonstrably sustainable and beneficial form of development that will serve to meet the affordable and open market housing needs of Yapton for the next 20 years and make a much needed contribution to boosting the supply of housing land in Arun District generally.

81. The proposals demonstrate compliance with “saved” Local Plan Policies GEN7 “The Form of New Development”, GEN 8 “Development and the Provision of New Infrastructure”, GEN9 “Foul and Surface Water Drainage”, GEN 14 “Public Transport”, GEN 15 “Cycling and Walking”, GEN 20 “Provision of Public Open Space within New Development”, DEV 17 “Affordable Housing” and AREA 2 “Conservation Areas” and the acknowledged conflict with “saved” Local Plan Housing Policies GEN 2, GEN 3 AND GEN 5 should be considered in the light of the Presumption in Favour of Sustainable Development at Framework Paragraph 14.

82. In this regard the outline planning permission sought should be granted as:
 - the relevant housing policies in the development plan are absent, silent and out of date as the Local Plan expired in 2011 and the Council is unable to demonstrate a 5 year supply of deliverable housing sites
 - there are no adverse impacts which would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole and
 - no specific policies in the Framework indicate that development should be restricted.

Appendix 1: Affordable Housing Statement

1. It is understood that the Council's affordable housing strategy for the period 2010 -2015 is called Raise the Roof and was approved by Full Council in December 2010. It is said to be designed to influence the actions of key players in the local housing market and to promote housing that supports and facilitates economic growth. One key action in the strategy is to enable the delivery of 1,000 affordable homes for local people between 2010 -2015.
2. Although the Council claims to have made good progress towards this target, with 665 affordable homes completed at March 2013, the Council still has a strong demand for all types of affordable housing throughout the Arun District for both rent and low cost home ownership so that at January 2013 there were 1,147 households in housing need on the Council's housing register.
3. The Applicant proposes that 30% (up to 75 dwellings) on this development will be affordable housing and that of these 80% would be for rent and 20% shared ownership in accordance with the Councils Interim Affordable Housing Policy adopted on 18 August 2010.
4. The provision of affordable housing in a sustainable location close to a sustainable settlement such as Yapton should be viewed as a considerable scheme benefit which (given the Outline nature of the submitted scheme) can either be delivered by way of standard condition on any outline planning permission granted or by way of a S106 Planning Obligation but in accordance with paragraphs 203 – 206 of the National Planning Policy Framework delivery by way of a condition should be preferred.

Appendix 2: Flood Risk Assessment & Drainage Statement

Introduction

1. **“Saved” ADLP Policy GEN9 “Foul and Surface Water Drainage”** seeks to prevent adverse harm to the water environment in terms of pollution and flooding, and to minimise the risks to life and property in vulnerable areas by stating that planning permission for development which will materially increase foul and/or surface water discharges will be refused unless the Local Planning Authority is satisfied that either adequate drainage capacity exists or appropriate drainage capacity can be provided as part of the development and that the use of Sustainable Urban Drainage Systems (SUDS) as alternatives to conventional drainage where appropriate should be considered.
2. This application has, however, been submitted in Outline with all matters reserved for later approval in the event that outline planning permission is granted so the purpose of this Statement is to assess whether as a matter of principle the location of the site and/or the development proposed would be likely to give rise to undue flood risk, to explain the Applicants proposed Foul and Surface water drainage strategy and consider whether or not such matters can be addressed and controlled through standard conditions imposed on any outline planning permission (in accordance with Circular 11/95) rather than to devise and specify detailed drainage schemes per se.
3. This approach is consistent with the most up to date Government policy and Environment Agency advice set out at paragraphs 99 – 108 of the National Planning Policy Framework (NPPF) and the relevant and associated Technical Guidance published by the Government alongside the framework as well as that applied to other recent outline planning applications for housing development for other sites in this part of Yapton.

The Relevant NPPF Policies and the associated Technical Guidance

4. The relevant NPPF Paragraphs are considered to be 100 and 103.
Paragraph 100 and its footnote 19 states that:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere” Footnote 19 states: “Technical guidance on flood risk published alongside this Framework sets out how this policy should be implemented”

Paragraph 103 and its footnote 20 states that:

When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment²⁰ following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and***
- development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.***

Footnote 20 states: A site-specific flood risk assessment is required for proposals of 1 hectare or greater in Flood Zone 1; all proposals for new development (including minor development and change of use) in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the Environment Agency); and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding.

5. Paragraph 2 of the Technical Guidance states that for the purposes of paragraphs 100 and 103
- **“areas at risk of flooding” means land within Flood Zones 2 and 3; or land within Flood Zone 1 which has critical drainage problems and which has been notified to the local planning authority by the Environment Agency;**
 - **“flood risk” means risk from all sources of flooding - including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.**
6. Paragraphs 3 – 5 of the Technical Guidance set out the:
- **aim of the sequential test which is to steer new development to areas with the lowest probability of flooding,**
 - **the role of Strategic Flood Risk Assessments which is to refine information on the probability of flooding, taking other sources of flooding and the impacts of climate change and provide the basis for applying the Sequential Test, on the basis of the flood zones in table 1 and**
 - **how the sequential and exception tests should be applied by local planning authorities by making it clear that their overall aim is to steer new development to Flood Zone 1 so that where there are no reasonably available sites in Flood Zone 1, local planning authorities should allocate land in local plans or determine planning applications for development at any particular location on the basis of the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required so that only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.**

7. Table 1 in the Technical Guidance describes Flood Zone 1 as follows:

Zone 1 - low probability

Definition

This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).

Appropriate uses

All uses of land are appropriate in this zone.

Flood risk assessment requirements

For development proposals on sites comprising one hectare or above the vulnerability to flooding from other sources as well as from river and sea flooding, and the potential to increase flood risk elsewhere through the addition of hard surfaces and the effect of the new development on surface water run-off, should be incorporated in a flood risk assessment. This need only be brief unless the factors above or other local considerations require particular attention.

Policy aims

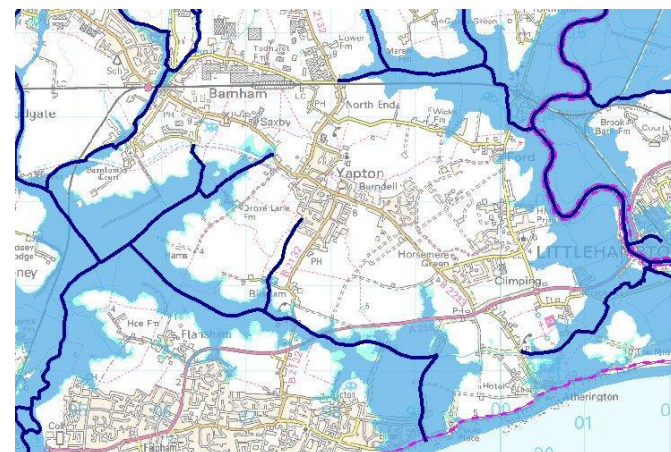
In this zone, developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of the development, and the appropriate application of sustainable drainage systems.

8. Sustainable drainage systems are described in the footnote to the Table as ***“Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible”***

Flood risk arising from the location of this site and the development proposed in accordance with NPPF Policy and the associated Technical Guidance

Flood Zone

9. Yapton as a whole and the application site in particular are within Flood Zone 1 and the site therefore comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)
10. All uses of land (including those considered to be most vulnerable to flooding such as residential) are considered to be appropriate in this Zone and the overall aim is to direct new development to Zone 1 areas in the first instance.
11. The Strategic Flood Risk Assessment (SFRA) prepared to support the emerging Draft Local Plan identifies that Yapton has a low probability of flooding from Rivers or the Sea and is not expected to be flooded from rivers or the sea in either the 2016 or 2056 climate change time horizons.
12. The site is, however, over 1 hectare in area and vulnerability to flooding from other sources should (briefly) be addressed unless local considerations require particular attention



Local Considerations

Flood Risk associated with Foul Sewer Drainage

13. The southern and western part of Yapton is situated within the Lidsey Waste Water Treatment Plant catchment area and the Environment Agency has notified Arun District Council that there are drainage problems associated with the increased use of that drainage system.
14. The northern and eastern part of Yapton and the application site itself are situated within the Ford Waste Water Treatment Plant catchment area and there are no known problems associated with that Treatment Plant and recent Consultation responses from Southern Water Services Ltd in respect of nearby housing proposals reveal that whilst there maybe capacity issues with regard to the existing Foul water pipe work between this part of Yapton and the Plant, the Plant itself has the capacity to accommodate additional Foul Water flows.
15. The Strategic Flood Risk Assessment (SFRA) prepared to support the emerging Draft Local Plan identifies that Yapton has, historically, experienced some flooding issues associated with Foul Sewers but these incidents have all occurred in the south and west of the settlement and none relate to sewers near the application site. (SFRA Map S)
16. Two recent Planning applications for residential development in the eastern part of Yapton have been approved on the basis that foul drainage would be via the Ford Waste Water Treatment Plant system and planning permission has been granted subject to standard controlling conditions in both cases. (Council References: Y/30/13 Outline application with some matters reserved for 34 dwellings - Land south of Fellows Gardens Yapton and Y/81/10 - Proposed development comprising of the construction of 173 new dwellings – Known as the Gleasons site).



Flood Risk associated with surface and ground water

Surface water flooding from the Land

17. The application site comprises circa 25 hectares of arable farmland which is situated on slightly higher ground to the north of Yapton (see submitted Topographical surveys).
18. The land has no positive land drainage system but there is no recorded incidence of surface water flooding on the site itself which suggests that rain water dissipates through a combination of natural soakage into the ground or surface water runoff when the ground is saturated due to high rainfall. Such uncontrolled surface water runoff can lead to an increase in flood risk elsewhere in lower lying parts of the settlement to the south and there is some historical evidence for such problems in lower lying parts of Ford Lane at times of high rainfall.
19. The submitted proposals would involve the development of up to 10.5 hectares of the site with residential development and ancillary landscaping and open space with the remaining 14.9 hectares of the site being given over to undeveloped public parkland and Green Corridors.
20. Given the location of the site within Zone 1, the lack of any existing land drainage system to positively control/restrict surface water runoff and the nature of the development proposed, there is a clear opportunity to reduce the already low probability of flood risk in the area and beyond through the introduction of positive surface water drainage management in the form of sustainable drainage systems designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible in accordance with NPPF Policy and the related Technical Guidance.

Ground water Flood Risk

21. The SFRA indicates that (like most of the coastal plain south of the downs in Arun District) Yapton and the site itself are situated within a Ground water emergence Zone (DEFRA 2004) where there is a high potential for ground water flooding although there are no recorded incidents of same locally.
22. Ground water emergence in this area is a product of the topography, geology and soils of the coastal plain relative to those of the South Downs which can mean that Groundwater flooding can occur when the water table in permeable rocks rises to enter basements/cellars or comes up above the ground surface. Groundwater flooding is not necessarily linked directly to a specific rainfall event and is generally of longer duration than other causes of flooding (possibly lasting for weeks or even months).
23. Groundwater levels are generally highest in early spring and lowest in early autumn. Therefore flooding that occurs in June to September is not normally caused by groundwater and flooding that occurs rapidly following high rainfall events is also unlikely to be caused by high groundwater levels although exceptions can occur if the water table is normally very shallow (as is the case here) and it has been very wet.
24. There is no strategic solution to resolve ground water flood risk as it is a naturally occurring phenomena but standard surface water drainage systems based on soakaways alone tend not to work in Ground water emergence zones so the standard drainage approach is to assess the appropriate use of a sustainable drainage management system on a site specific basis. The existence of a ground water emergence zone does not, therefore, in itself prevent a site being developed as a matter of principle and the standard response to such localized circumstances is to design and implement bespoke sustainable drainage management systems to match the site conditions and the development proposed.
25. Finally in this section it should be noted that the application site forms a small part of a very much larger Strategic Housing Land Availability Site (Ref 71) which the SFRA specifically looked at in order to assess its suitability for development from a flood risk perspective.
26. The SFRA found that application site is located in the extreme south western part of the whole area where the SFRA suggests that development should be directed so as to avoid parts of the site which are more at risk to the north and east.
27. Overall the SFRA supports the principle of development on the application site subject to standard and brief FRA proportionate to the outline nature of the scheme proposed.

The Foul and Surface water drainage Strategy for the Proposed Development

Foul Water Drainage Strategy

28. It is proposed that the development be connected to existing foul surface water sewers nearby to the north, east and/or the south so that the development drains to the Ford Waste Water Treatment Plant which has sufficient capacity to accommodate such flows from a development of this size notwithstanding the cumulative increase in flows arising from earlier schemes permitted.
29. It is understood that SWS Ltd may advise that existing foul sewers between the site and the FWTP may not have the capacity to cope with flows from the development proposed but Section 98 of the Water Industry Act 1991 provides a legal mechanism through which the appropriate infrastructure can be requested (by the developer) and provided to drain a specific location. Once a S98 application is received further modelling work can be completed, if necessary and a budget estimate for the works required can be provided so that the works required can be completed.
30. This is a standard routine process for developers and SWS Ltd alike and one that is most appropriately undertaken at detailed application stage once the number of dwellings proposed, the dwelling mix and the layout of the scheme can be finalised and therefore the precise connection points and Foul water flows established and is therefore a matter for standard Grampian style conditions on any outline planning permission granted.

Surface Water Drainage Strategy

31. The site lies in Zone 1 where developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of the development, and the appropriate application of sustainable drainage systems. These cover a whole range of sustainable approaches to surface drainage management designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible and the applicant is willing to implement such a strategy.
32. The large amount of public open space and landscaping proposed as part of the submitted scheme provides an ideal opportunity for such sustainable drainage schemes to be explored and implemented as part of any development and there is, therefore, no reason to assume that an acceptable surface water drainage scheme cannot be designed at detailed application stage and successfully implemented so that this is also a matter which can and should be satisfactorily addressed via Grampian style conditions imposed on any outline planning permission granted.

Appendix 3: Archaeology & Heritage Statement

1. This Statement has been prepared and submitted in accordance with guidance contained in paragraphs 128/129 of the National Planning Policy Framework which reads as follows:

128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

2. This Statement has been prepared using available Archaeological records and previous assessments undertaken for sites nearby as there are no records indicating that the site itself is likely to have any archaeological interest in its own right (given the longevity of its agricultural use and the regularity with which intensive modern ploughing techniques are undertaken) and only part of one boundary (part of the southern boundary) actually abuts the nearest Heritage Asset namely the Church Lane Conservation area centred on the listed St Mary's Church.

The Impact on the Heritage Asset and its setting

3. Yapton has two Conservation Areas (both designated in 1994) but only one (Church Lane) is sufficiently close to the application site to be of interest here. The Councils adopted Conservation Areas Supplementary Planning Guidance describes the Conservation Area as follows:

“The first Conservation Area is based on St. Mary's Church, the adjoining Church Farmhouse and three substantial houses, including Church House and Park Lodge, both Listed Buildings to the west. The loose grouping of buildings contrasts with the second Conservation Area where there is a more closely knit pattern of development. High substantial flint boundary walling and mature landscaping, including many substantial trees and tree groups, enhance the rural character of this area, the setting of the buildings and the street scenes”.

4. It is noteworthy that only the northern boundary of the Church Yard abuts the application site as the eastern boundary is separated from the site boundary by intervening land belonging to Church Farm and the residential properties on the north side of Church Lane lie outside of the defined Conservation Area.

St Mary's Church

5. The Church was listed as a Grade 1 Listed Building in 1958 and the listing description reads as follows:

“Chancel, nave with aisles and tower to the south west of the nave. Nave and tower C12. The nave has lean-to roofs with later dormer windows inserted. The tower has red brick buttresses and a hipped shingled roof. Chancel C13. Very attractive unrestored medieval church.”



6. Although there was a church on the site in the Saxon period, all that remains of this is the lower part of the tower as most of the church dates from 1180-1220; the nave and tower date from 1180-1200 and the chancel from 1200-1220. The porch was added sometime after 1400, along with the west window and the additional buttressing of the tower to counter evident subsidence may also have been added in this period. Dormer windows were inserted in the ceiling in the 17th century, and the present East Window inserted in 1902. This replaced an 18th century one which itself replaced the original lancets (the remains of which are clearly visible).
7. Moreover whilst the Church was historically at the centre of the largely rural village, modern 20th century development has tended to focus on and migrate towards the southern, eastern and western parts of the village so that today the Church and its associated Conservation Area are on the northern outskirts of the village rather than at its heart.
8. The undoubtedly attractive setting of the church derives from its quintessential English village churchyard which surrounds the Church itself and the views of the Church from the existing recreation ground at the centre of the village and Church Lane itself.
9. In this context the application site to the north and east of the Church contribute little to its setting being largely treeless and featureless arable fields so that views of the church from the footpaths which radiate outwards from the wall lined footpath forming part of its western boundary are disappointing given the rather more attractive views achieved from Church Lane itself.

10. The proposals are to cocoon and surround the Church and its associated churchyard (and therefore its associated Conservation Area) within the proposed landscaped park land public open space so that hitherto largely hidden views (due to lack of public access) of the Church yard and the church itself from the north and east are open to a wider section of the public.
11. The effect of the proposed Open Space element of the proposals would be to distance the proposed housing from the Conservation Area and the Church (whilst at the same time not too distant to be accessible with ease by foot or cycle) so as to enhance and preserve the setting of the Church as a listed building and the setting of the Conservation area generally and establish it as a central focal point of the village as opposed to being somewhat isolated on its northern outskirts.
12. Therefore it is considered that the proposals would have a positive enhancing effect on the setting of these heritage assets similar to and complementing that of the existing recreation ground to the south.

Archaeology

13. The historic environment record has been consulted but this does not reveal any finds of interest on the site itself which given its long agricultural use is surprising as one would expect that farming practices over the years would have revealed some finds although such activities tend to destroy rather than preserve archaeological finds.
14. This said it is acknowledged that a search of the W Sussex Historic Environment Record (HER) is not definitive and the records from more recent studies on nearby sites and the written advice from WSCC Officers in Consultation responses for those sites has also been considered.
15. It is understood that the results of archaeological evaluation on land off Goodhew Close and north of Burndell Road (immediately abutting the southern extremity of the application site) in 2011 revealed that there were three main areas of archaeology across that site with all the features being almost exclusively prehistoric (Bronze Age or early Iron Age) although some Roman coins were found in the north eastern part of the site. Most of the features were ditches reflecting a rural, farmed landscape in prehistoric times but there were also pits, possible postholes and a trough packed with burnt flint which indicated settlement or processing activity nearby with one large pit, close to this trough filled with burnt flint, containing some small pieces of animal bone with distinct butchery marks.

16. Based on this evidence taken in conjunction with finds of Bronze Age pottery (in sufficient quantities to represent more than an odd shard which might be found as occasional debris in a field ditch) suggests to WSCC Archaeology Officers that it is reasonable to conclude that there was settlement in the vicinity of that site.
17. This generally supports the acknowledged pattern of finds elsewhere on the coastal plain that indicates that it is particularly rich in prehistoric and Roman evidence and whilst this is not in itself a reason to withhold permission to develop the site, it does support the use of a standard condition on any outline planning permission granted as a precautionary measure to ensure that any potential archaeology is not destroyed before it can be recovered and recorded and the opportunity to investigate and further archaeological understanding that any development presents can be fully exploited. The suggested condition is as follows:

“No development shall commence until an archaeological investigation of the site has been carried out at the expense of the developer in accordance with a specification (written scheme of investigation) to be submitted to and agreed by the Local Planning Authority in writing.”

Appendix 4: Landscape & Public Open Space Statement

Existing Landscape Character

1. The application site is not the subject of any nationally or locally acknowledged landscape designation and is not, therefore subject to any specific policy which seeks to protect the site from development other than “Saved” Local Plan Policy GEN 3 which designates all land outside of defined built up area boundaries as countryside as a matter of policy and principle.
2. In 2006 the Council commissioned the Arun Landscape Character Study which sought to establish broad landscape character areas within the district so as to assess their capacity to accommodate large scale development as a precursor to establishing areas of search for the location of strategic scale development as part of the still on-going replacement Local Plan process.
3. The site lies within a broad character area to the north of Yapton which the study identifies as having low/medium capacity for such development.
4. More particularly however the study characterizes the specific fields which make up the application site as being “*Large-scale arable farmland*” in type which is then further refined into two sub types being “*Large-scale enclosed arable farmland*” (L1a) and “*Large-scale open arable farmland (L1b)*”
5. The Plan in the Landscape Study is inaccurate as to precise boundaries due to the scale used but the application site is predominantly typified as being “*Large-scale enclosed arable farmland*” (L1a) which distinguishes the fields in character from the farmland in the same family ownership to the east which is typified as being “*Large-scale open arable farmland (L1b)*”

6. The text describes Large scale enclosed arable farmland (L1a) as being:

- Intensive arable farmland
- Relatively large fields across relatively flat or gently undulating landform
- Well developed structure of hedges, shaws (a small wood or thicket), copses and woodland which break up views across it and give a sense of large-scale enclosure
- Typically found on upper coastal plain, at the foot of the downlands



In contrast the large scale open arable farmland to the east of the site is described as being the same but with the clear distinction that field boundaries tend to be drainage ditches and/or fences with weak/remnant hedgerow structure in places, with few mature trees and Long views to downs to north.

7. Visually the application site is exposed when viewed directly from Ford Lane across its road frontage but is seen against the backdrop of the trees, hedges and buildings which define the northern extent of the existing settlement. From the east and west, however, the site is visually contained and enclosed by established trees, hedgerows and copses which break up views across it and give a sense of large scale enclosure.
8. It is acknowledged that the proposed housing and open space development would significantly alter the appearance of the arable farmland and its character but the main principle underpinning the proposed landscaping and public open space proposals is to enhance and build upon the identified structure of existing hedges, shaws, woodland and trees which already give the site a sense of large scale enclosure so as to increase the bio diversity of the site and enhance its appearance and interest as well as soften and minimise the potential impact of the proposed housing.

Landscape and Public Open Space Strategy

9. The application has been submitted in outline so that appearance, scale and landscaping are all reserved matters but subject to the establishment of a clear strategy now coupled with suitably worded conditions on any outline planning permission granted, there is no reason to think that the development would not significantly enhance the setting of Yapton and enhance the character and appearance of this part of its hinterland.
10. The proposed Landscaping and public open space takes two forms being that which would normally be required as part of any housing development and the more substantial and less formal public open space and park land for which outline planning permission is also sought.

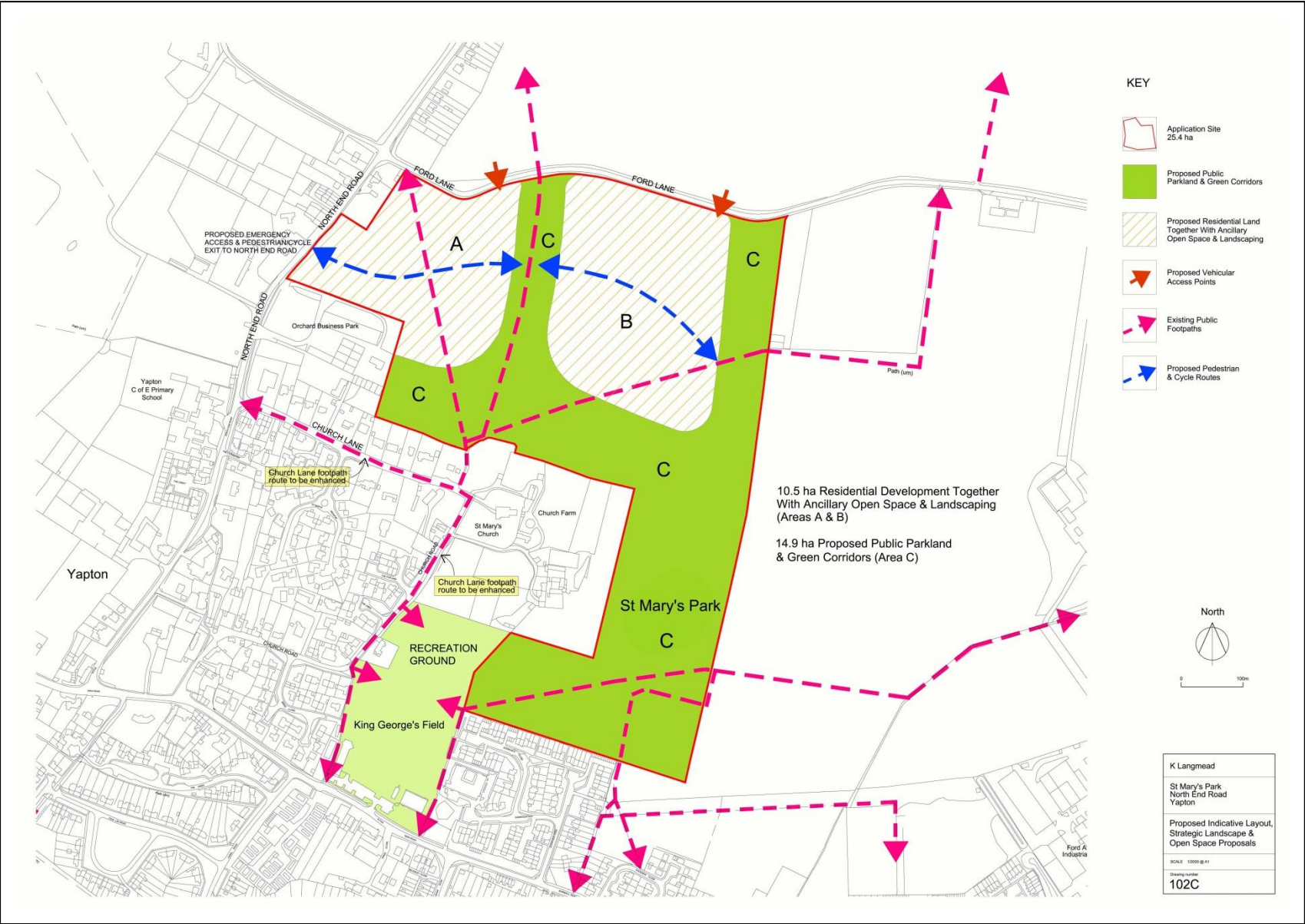
Ancillary Landscaping and open space (1.4 hectares) associated with the Housing areas A & B

11. The area proposed for housing (Areas A & B = 10.5 hectares) would include areas to be set aside for ancillary POS/Landscaping with the size of these areas calculated using the Councils adopted Supplementary Planning Guidance. (SPG)
12. SPG Paragraph 2.3 states that the Councils standards are 2.4 hectares of open space to be provided for every 1000 people and paragraph 2.7 states that this will be based on an estimate of 2.4 people per dwelling. Therefore in the case of an outline application such as this the amount of ancillary POS/Landscaping required can be calculated as being 1.4 hectares using the formula given at paragraph 2.8 (Estimated population = 600 (250 dwellings x 2.4 estimated occupancy) x 24 sq. metres per person = 14,400 sq. metres/10,000 sq. metres = 1.4 hectares).
13. Clearly how this amount of ancillary POS/landscaping is used or laid out within the residential land proposed does not form part of the outline application but it does indicate that the remaining residential land available for housing would be 9.1 hectares calculated as follows: 10.5 hectares – 1.4 hectares = 9.1 hectares meaning that the residential development would be for up to 250 dwellings at a notional/average net site density of 27 dwellings per hectare.

14. The submitted indicative layout plan demonstrates that the housing areas are of a sufficient size to enable the proposed houses to be set well back from Ford Lane and North End Road whilst still accommodating the 1.4 hectares of ancillary open space and landscaping which could (together with the intended retention of existing trees and hedges) be arranged and laid out so as to complement the proposed informal landscaping and open space proposed and soften the appearance of the development (in addition to the proposed parkland) when viewed from Ford Lane and minimise the need for the appearance of the site to change at all when viewed from North End Road.
15. It is anticipated that these issues can be addressed by standard conditions imposed on any outline planning permission granted so that there is no reason to assume that the proposed housing would cause demonstrable harm to the character and appearance of Ford Lane and/or North End Road.

Proposed Public Parkland and Green Corridors (14.9 hectares) Area C

16. The proposed Public Parkland requires planning permission as it amounts to a development proposal which is separate from the proposed housing development and as such it therefore forms part of the submitted outline application which seeks outline planning permission for the principle of developing this part of the site for such parkland as the landowner (and applicant) is committed to its creation and implementation because of the many benefits that it would deliver for the Community.
17. The proposed Parkland would not only create a demonstrably high quality environment for the future residents of the housing development proposed but would also create green infrastructure corridors and landscaped areas and wildlife habitats, improve the landscape features of the area, create defensible green buffers around the settlement, the Conservation Area and the Church and informal recreation areas for existing/future residents and provide ease of access to the open countryside beyond Ford Lane and to the east.
18. The proposed Parkland area (as shown on the Indicative layout plan) would build on the existing landscape framework and character by retaining and enhancing the structure of hedges, shaws (a small wood or thicket),, copses and woodland which form the boundary features of the site and currently break up views across the site and give it a sense of large-scale enclosure which separates and distinguishes the site from the more open large scale arable fields particularly to the east. It would serve to re-establish landscape features, character and visual interest that has been lost due to intensive arable land use and which is, historically, more typical of such sites on the northern coastal plain of this part of West Sussex.
19. Additionally and most importantly the proposed Parkland would significantly and demonstrably enhance the setting of this part of Yapton and create a valuable local resource that would make a significant contribution to the long term health, social and cultural wellbeing of the whole Community.
20. The landowners' intentions regarding the delivery of the proposed Parkland are set out in the Delivery Statement at Appendix 5.



Appendix 5: Delivery Statement

1. Outline planning permission is sought for the principle of developing the site with:
 - 10.5 hectares of residential development (comprising up to 250 dwellings (30% to be affordable) together with ancillary open space and landscaping)
 - 14.9 hectares of public open space development to be laid out as public parkland and landscaped green corridors.
 - Vehicular access from Ford Lane (The means of access).
2. This Statement therefore sets out how the landowner/applicant envisages that the development proposed will be delivered having regard to land ownership, timeframes, viability and Infrastructure provision to the extent that this is possible with an outline application of this nature and the fact that the applicant does not intend to develop the site himself.
3. The purpose of the Statement is to explain to the Community how the landowner envisages that the scheme proposed can be delivered. It is important to acknowledge, however, that it is not possible to be definitive or prescriptive with regard to any of these matters given the outline nature of the application and the fact that no potential developer is currently involved so what follows should act as a guide for the Local Planning Authority when considering potential conditions and/or requested S106 Planning Obligations to ensure that these complement the delivery of the proposals as envisaged rather than prevent or inhibit same.

Land ownership

“The Housing Land”

4. In the event that the Outline Planning permission sought is granted as proposed it is envisaged that the 10.5 hectares of land for residential development with ancillary open space and landscaping together with sufficient land to enable the proposed means of access to be provided from the public highway (Ford Lane) would be transferred to a developer who would be responsible for preparing and submitting a detailed planning application in accordance with the relevant controlling conditions imposed on any outline planning permission granted and in compliance with any S106 Planning Obligations provided by the

Landowner so that this part of the site can be developed as envisaged. It is envisaged that such conditions and obligations would relate to all those matters which are required as a result of the housing development proposed (e.g. affordable housing, ancillary POS/landscaping, vehicular/pedestrian access, off site highway works (including Bus Stops relocation), pedestrian/cycle improvements and infrastructure contributions)

“The Parkland and public open space land”

5. The 14.9 hectares of land proposed to be developed for public parkland and green infrastructure corridors would not, however, be transferred to a developer and would remain under the control of the landowner with access rights and other matters protected by covenants on the transferred Housing land so that the Parkland can then be implemented and delivered in accordance with any relevant conditions and S106 Planning Obligations imposed in this regard on any outline planning permission granted and the strategy set out below.

Timeframes and Phasing

The 10.5 hectares of residential development (comprising up to 250 dwellings (30% to be affordable) together with ancillary open space and landscaping)

6. Framework Paragraph 47 states (amongst other matters) that. to boost significantly the supply of housing, local planning authorities should: identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements and identify a supply of specific, developable 12 sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
7. The Framework states that to be considered “Deliverable” Sites *“should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans”*
8. The Framework also states that to be considered “Developable” sites *“should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged”*.

9. Currently there are no deliverable or developable sites identified to meet the housing requirements or needs of Yapton over these time frames but it is considered that the application site has the potential to be considered to be both a deliverable and a developable site in terms of Framework Paragraph 47 with it being likely that the site would develop in three phases as set out below. .
10. **Phase 1: 2013 – 2018:** The site offers a suitable location for housing development now and subject to the outline planning permission .sought would be capable of delivering circa 100 of the maximum number of 250 dwellings proposed within the next 5 years. This assessment acknowledges that it will take time to find a developer, transfer the site to that developer, obtain a detailed planning permission and implement the relevant infrastructure (Vehicular access, foul and surface water drainage, internal roads etc.) necessary to build the houses themselves.
11. **Phase 2: 2018 – 2023:** In view of the foregoing it is envisaged that the next 100 dwellings would be identified as a developable site that would be developed in years 6 – 10 with a further circa 100 dwellings.
12. **Phase 3: 2023 – 2028:** It is envisaged that the remaining 50 dwellings and the final completion of this part of the development as a whole (together with all ancillary landscaping and open space and road adoption etc.) would take place in years 11-15 with the ancillary open space and landscaping being transferred to a management company (or some other body of the developers choosing) to ensure its long term retention and management in accordance with the terms of any permission granted.

The 14.9 hectares of public open space to be laid out as public Parkland and landscaped Green Corridors

13. There are two issues for consideration here which are a) the Funding and initial provision of the proposed Parkland and landscaped Green Corridors and b) the long term management, maintenance and viability of the proposed Parkland and landscaped Green Corridors.

a) The Funding and initial provision of the proposed Parkland and landscaped Green Corridors

14. Currently there are 3 alternative approaches under consideration in this regard but all three would be funded from the sale proceeds received by the landowner from the sale of the housing land to a developer.

Alternative 1

15. Although the land would remain under the control of the landowner so as to ensure its delivery and long term retention for the purposes specified it is possible that the construction and delivery of the parkland and landscaped Green Corridors could be undertaken alongside the main housing development by the developer subject to a suitable financial arrangement being negotiated as part of the sale/transfer of the housing land. This would ensure that the Parkland and Green Corridors are developed and provided at the same pace as the proposed housing.

Alternative 2

16. The landowner could establish a Community Trust whose responsibility would be to accept the transfer of the land from the owner and facilitate/develop the Parkland and the landscaped Green Corridors on behalf of the Community funded by a capital sum provided by the current landowner from the housing land sale which would accompany the transfer and enable the land to be developed in a manner agreed by the trust on behalf of the Community. This approach could result in a delay in the parkland and Green Corridors being provided resulting in their provision being out of step with the housing development.

Alternative 3

17. Yapton Parish Council could accept the transfer of the land from the owner and facilitate/develop the Parkland and the landscaped Green Corridors on behalf of the Community funded by a capital sum provided by the current landowner from the housing land sale which would accompany the transfer and enable the land to be developed in a manner agreed by the Parish Council on behalf of the Community. This is the alternative approach that is favoured by the Landowner who is committed to discussing this approach with the Parish Council albeit on a without prejudice basis.

b) The long term management/maintenance and viability of the Parkland and landscaped Green Corridors.

18. The landowner is willing to ensure that the proposed Parkland and Green Corridors are provided for the benefit of the wider community funded from some of his proceeds from the sale of the proposed Housing Land but does not wish to retain ownership of same or the on-going maintenance and management costs for same.

19. Therefore notwithstanding which of the alternatives are adopted to address the practical delivery of the Parkland and Green Corridors land a solution to the long term maintenance, management and viability of the areas will need to be identified and found.
20. Currently it is envisaged that the most practical and viable option in this regard is for the Parish Council to accept these long term responsibilities on behalf of the Community funded through a combination of the increased Council Tax arising from residents of the new housing, a proportion of the new homes bonus that will be received by Arun District Council and government grants or some other form of public funding and the landowner is currently committed to discussing this option with the Parish Council on a without prejudice basis.
21. Finally whilst the landowner is committed to the provision of 14.9 hectares of his land as public parkland and green infrastructure corridors for the benefit of the Community and has therefore applied for the permission necessary to implement his intentions and will continue with his efforts to negotiate with the Community through its elected representatives in this regard, it is important to recognise that the principle of developing the remaining 10.5 hectares of his land for housing is not dependant on this aspect of his proposals as the housing element of his proposals are considered to be acceptable in their own right with or without the proposed additional Parkland and Green Corridors.

General Infrastructure Provision

22. The Council has not adopted any Supplementary Planning Guidance or Supplementary Planning Document which details the specific infrastructure or contributions that it would seek for a development of the type proposed in accordance with “Saved” ADLP Policy GEN 8 “Development and the Provision of New Infrastructure”. Nor has the Council adopted any Charging Schedule under the Community Infrastructure Levy Regulations 2011 (as amended) so there is no information available as to what the Council may seek in this regard.
23. In view of this the Applicant sought Community views on this aspect when undertaking the Pre Submission Consultation but unfortunately whilst many responding expressed the view that the proposals would place a strain on local Infrastructure and Services, views as to what the proposed development could and should provide in this regard were very divided with no particular definitive views or preferences being expressed.
24. In view of the foregoing it is difficult for the applicant to be prescriptive in this regard other than to say that the applicant will consider any fair and reasonable requests put to us by the Council in respect of the provision of, or contribution towards the

cost of, infrastructure, service or amenity provision (as defined in the policy) and subject to these requests complying with CIL Regulation 122 will meet those requests through S106 Planning Obligations. Therefore there is no reason to assume that the submitted proposals would not or could not accord with this “saved” Development plan policy.