
Planning Statement

Land at Ford Road, Arundel

Prepared for:

The Norfolk Estate

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Planning Statement

Land at Ford Road, Arundel



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1. Introduction

- 1.1. This Planning Statement has been prepared by Savills on behalf of the Norfolk Estate and is submitted in support of an outline planning application with all matters reserved except for access for the development of land at Ford Road, Arundel (hereafter referred to as “the Site”) which falls within the administrative area of Arun District Council (ADC). The proposal is described as follows:

“Outline application for the development of 90 dwellings and associated amenity land on Land at Ford Road, Arundel, with all matters reserved except for means of access”

- 1.2. The application proposes a new road access from Ford Road into the site in the form of a standard priority junction. This will allow access to a high quality residential scheme comprising a range of dwellings sizes, types and tenures, including the delivery of a policy compliant level of affordable housing.
- 1.3. The proposals have been produced with an indicative masterplan to demonstrate how the scheme will integrate with the existing adjacent residential development to the north east of the site and how the provision of the access point for vehicles, along with pedestrian footpaths and emergency access route, will create an attractive, safe neighbourhood with natural surveillance over public spaces.
- 1.4. Prior to submission of this application, pre-application advice was sought from ADC and West Sussex County Council Highways (WSCC). In addition, a robust public consultation exercise was undertaken. Full details of this engagement, in the form of a Statement of Community Engagement, are included as part of the submission package of this application.

Supporting Information

- 1.5. This Planning Statement should be read in conjunction with the following submitted plans and reports:

Document	Prepared by	Reference
Location Plan	Savills Urban Design	RI001 Rev1
Design & Access Statement	Savills Urban Design	-
Illustrative Masterplan	Savills Urban Design	IM003 Rev 1
Parameter Plans	Savills Urban Design	PP001
Indicative Elevations	Savills Urban Design	SK01
Overall Planting Plan	Davies Landscape Architects	DLA.1972.L.19.P02
Landscape Visual Impact Assessment	Davies Landscape Architects	DLA.1972.LVIA.RPT.01.V2
Ecological Assessment	Engain	eg17809.003
Transport Assessment	Ardent	173483-04
Flood Risk Assessment & Drainage Strategy	Ardent	173483-01

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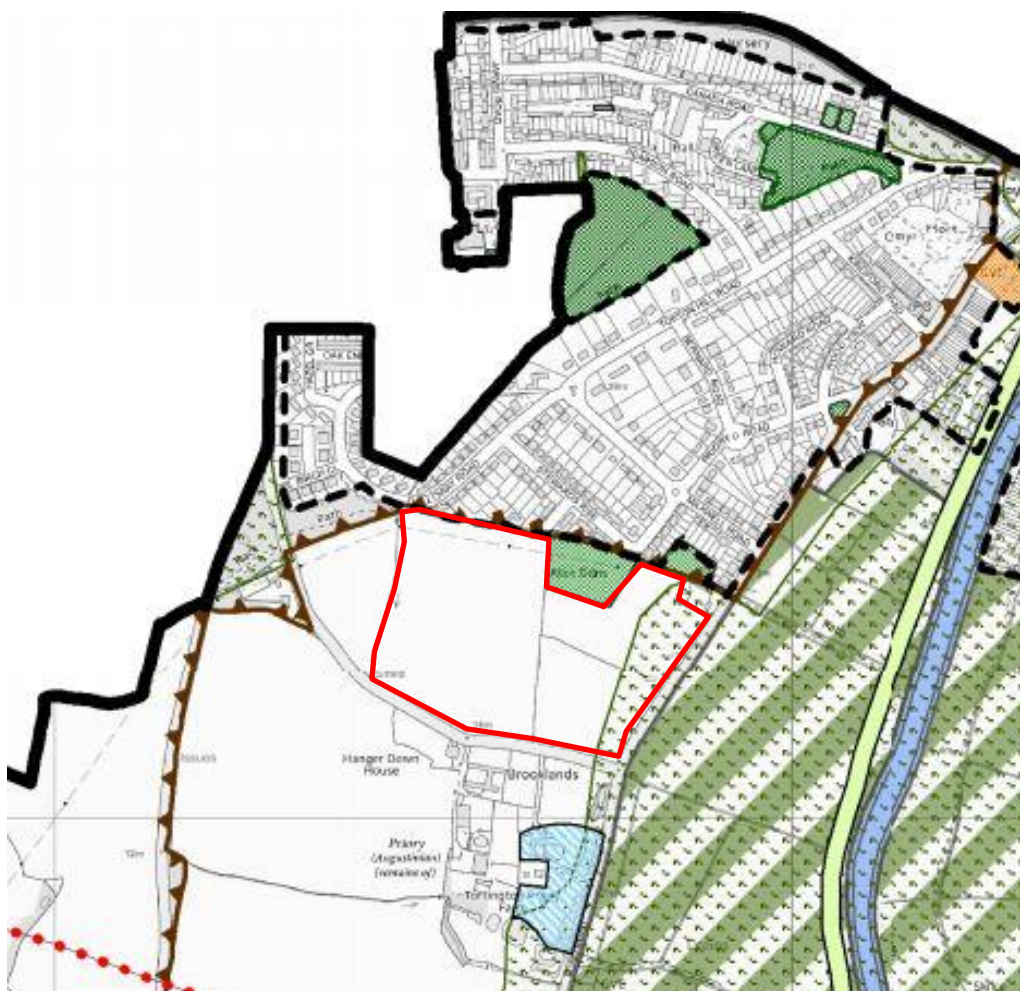


Hydraulic Modelling Note	Ardent	173483 - 03
Heritage Statement	Savills Heritage	-
Statement of Community Involvement	BECG	-
Outdoor Lighting Strategy	MMA Lighting Consultancy	MMA 16069 Revision 1
Indicative Lighting Design Drawing	MMA Lighting Consultancy	MMA16090/001
Adoptable Street Outdoor Lighting - Report	MMA Lighting Consultancy	-
Private Street Outdoor Lighting - Report	MMA Lighting Consultancy	-
Arboricultural Implications Report	SJA Trees	SJA air 19515-01a
Geotechnical Survey	Southern Testing	J14309
Noise Assessment	Ardent	173483-06
Air Quality	Ardent	173483-05

2. Site Context

The Site and its surroundings

- 2.1. Land at Ford Road, Arundel is located to the south west of the town of Arundel. The site comprises approximately 9.8ha of land, and is identified in the Arun Local Plan 2011-2031 (adopted July 2018) as being outside of the defined built-up area boundary. However, the more recently adopted Arundel Neighbourhood Plan 2 (adopted January 2020) amends the settlement boundary to include the proposed developed part of this site within the existing settlement boundary. The Neighbourhood Plan also specifically allocates the site for development under Policy AR2 – Land off Ford Road.
- 2.2. Local Plan Extract



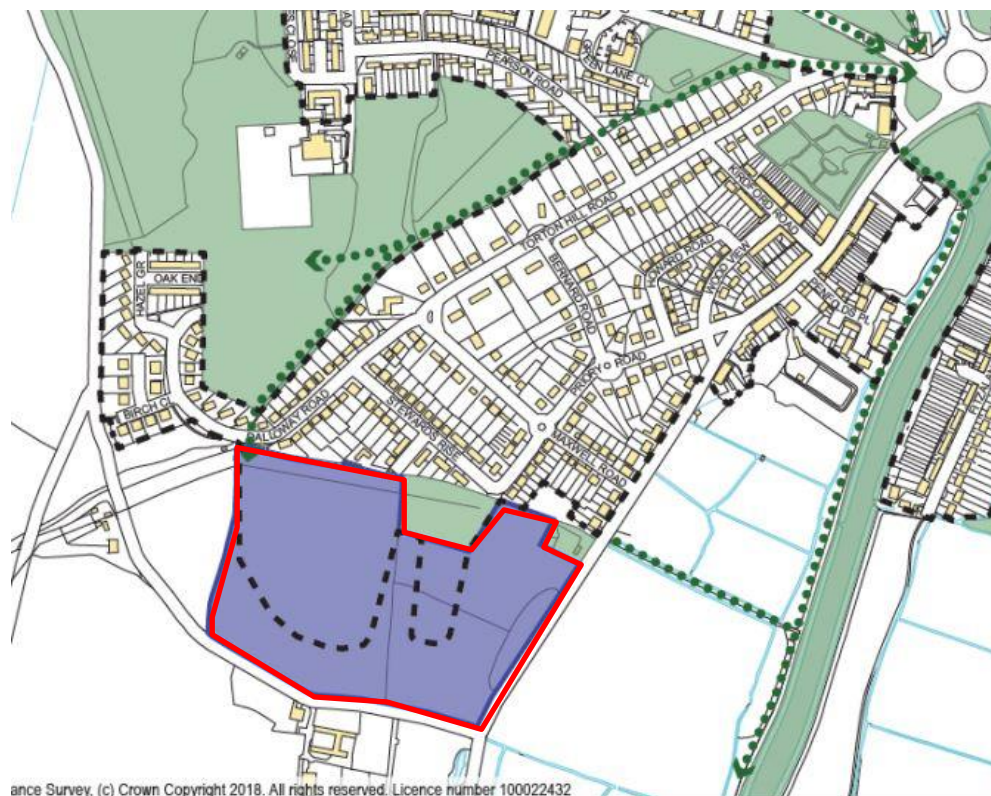
 Approximate Site boundary

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2.3. Neighbourhood Plan Extract



— Approximate Site boundary

- 2.4. The site is currently in agricultural use, with no existing built form on the site, and a band of mature trees running most of the way across the site from north to south centrally within the site. The site is bounded to the north by residential development and allotments, to the east by Ford Road, to the south by Priory Lane, and to the west by existing mature hedgerow and trees. The site boundary consists of a combination of mature trees, hedgerow, and post and wire fencing. The natural topography of the site is one that slopes broadly downhill from north west to south east.

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- 2.5. In terms of designations, the site is largely unconstrained. The site is primarily located within Flood Zone 1, with an area of Flood Zone 2 and 3 running alongside the eastern boundary alongside Ford Road. A small area alongside Ford Road on the eastern boundary of the site is classified as a Biodiversity Opportunity Area, and just beyond the site boundary in the north western corner is an area of ancient woodland. A Tree Preservation Order is in place over the band of trees that run vertically within the site between the eastern and central fields.
- 2.6. The site is approximately 1.5km from the centre of Arundel, where a good range of shops and services are present. In terms of public transport access and connectivity, the site is 2km to the north of Ford railway station and 1.8km west of Arundel railway station; there are a number of bus stops present in the neighbouring residential area to the north, and access to the primary east-west vehicular route along the south coast (the A27) is approximately 800m to the north east of the site.
- 2.7. The site is not located within a Conservation Area, and there are no listed buildings on the site. In the wider context of the site, the Tortington Priory and Ponds are located to the south of the site, and are recognised as a Scheduled Monument. In conjunction with Tortington Priory, the Grade II listed Tortington Priory Barn is also located to the south of the site. The Grade I Listed Arundel Castle and its associated grounds are approximately 800m to the north east of the site.

3. Planning History

- 3.1. There is no recent, relevant planning history on the site.

4. Pre-application & Community Engagement

Pre-application Engagement

- 4.1. Pre-application advice was sought from ADC in April 2020, with a virtual meeting held over MS Teams in July 2020. The proposals submitted to the Council showed a development of 90 homes, with access achieved through the provision of a new priority junction on Ford Road.
- 4.2. In addition to engagement with ADC, pre-application engagement was also undertaken with WSCC Highways with regards to access arrangements and principles of any internal layout.
- 4.3. Feedback from ADC was received on 7 July 2020. The feedback received stated that the principle of developing the proportion of the site located within the settlement boundary area set out in the Neighbourhood Plan was acceptable. The principle of access coming into the site from Ford Road was also determined to be acceptable.
- 4.4. As part of the pre-application package, an indicative layout was submitted, along with design concepts for the dwellings and an overall design ethos for the proposals. ADC offered a number of comments on these, including:
- Access – the access onto Ford Road should reflect the surrounding character and not be over engineered
 - The site layout should be predicated upon the surface water drainage strategy for the site, and could include provision of attenuation basins and swales
 - Parameter Plans are required to identify the heights of dwellings especially as the site is located within the setting of Arundel
 - The site layout should take into account the root protection areas (RPAs) of the trees that are subject to Tree Preservation Orders
 - The affordable housing mix should accord with a tenure split of 75% rented and 25% intermediate housing. For the proposed 90 units this would be as follows:

	Rented	Intermediate
1 bed	6	2
2 bed	10	3
3 bed	4	2

- 4.5. The proposed layout submitted with the outline application was not felt to be acceptable and the following points needed to be addressed:

Design & Layout

- Proposals do not set out how the proposed residential development accords with the provisions of the National Design Guide or the Arun Design Guide.

- The layout of the dwellings located on either side of the access road from Ford Lane needs to be amended by removing the gable ends and introducing dual aspect units, which would assist in providing a sense of arrival, together with active frontages.
- the precise alignment of the access road would need to be revised to take into account the root protection areas of a number of high value retained trees on the site
- Alongside the provision made for an on-site LEAP, LAPs should also be included.
- Proposal does not identify land for a community building
- An illustrative layout at the outline planning stage would not be detailed enough to show parking provision, however, there would need to be a commitment to meet the required standards as set out in the Arun District Parking Standards SPD, January 2020, comprising 2 car parking spaces per dwelling, 20% provision for visitor parking and 1 cycle parking space per dwelling
- The Design and Access Statement which will accompany the forthcoming outline planning application for the mixed use development on Land at Ford Road will need to identify different character areas within the residential development, which will help to create a sense of place and provide the development with an identity.
- Rear Gardens of all houses should measure at least 10m in length

Trees

- Trees growing alongside Priory Lane and overlapping the western parcel have not been considered; and these will need to be included in any subsequent planning application

Open Space

- A clear indication of the proposed future management of the public open space, play and public realm areas must be provided with the forthcoming planning application. Commuted sums would be required should the public open space or play areas be transferred to the LPA for maintenance

Noise

- A noise report should be submitted with the forthcoming outline planning application, to ensure the safeguarding of neighbouring residential amenity

Ecology

- An Extended Phase One Habitat Survey should be undertaken to determine the presence or otherwise of protected species within the site and the impact a development would have on the surrounding environment. Following this survey, if any further surveys are recommended we would require these to also be undertaken and any mitigation required to be considered and included within the planning application.
- A biodiversity strategy will need to be submitted, including information on Biodiversity Net Gain
- The Biodiversity Strategy should include and incorporate a variety of ecological enhancements including:
 - any trees removed should be replaced at a ratio of 2:1;
 - wildflower meadow planting should be used in the landscaping of the site;
 - a wildlife pond should be incorporated in the layout;
 - any gaps in tree lines or hedgerows should be filled in with native species;
 - bat bricks / tiles should be integrated into the buildings onsite facing south/south westerly positioned 3-5 metre above ground;

- bird boxes should be installed on the buildings / and or tree within the gardens of the properties;
- grassland areas should be managed to benefit reptiles;
- log piles should be provided on-site
- gaps should be included at the bottom of garden fences to allow movement of small mammals across the site;
- two hedgehog nesting boxes should be included on the site.

Energy Efficiency

- The proposed development on Land at Ford Road must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site

Drainage

- Winter infiltration testing and winter groundwater monitoring must be undertaken. It is advised that the extent of the winter infiltration testing and winter groundwater monitoring is confirmed with ADC Drainage Engineers.

WSCC Highways Pre-application

- 4.6. Pre-application discussions were held with WSCC Highways, with written feedback received in July 2020. Overall, WSCC were happy with the approach taken to address the highways connectivity aspect of the scheme. The original proposals included a straight road from the Ford Road junction into the residential development, but WSCC advised that a curved road would be preferred in order to better manage speed. It was advised that a priority junction in order to access Ford Road was a suitable approach, and that a Road Safety Audit should be supplied to assess the safety of the junction
- 4.7. WSCC advised that they would not support the introduction of a speed limit of 30mph either side of the junction of the proposal onto Ford Road, as this would be inappropriate given the existing speed limits and location of the junction, and the fact that there is no visible development proposed to be sited close to the road edge.
- 4.8. WSCC Highways also advised that the proposed emergency vehicular access via Dalloway Road would be acceptable, given that it would be a pedestrian/cycle route and would be gated so that it could only be accessed by emergency vehicles.

Public Exhibition

- 4.9. A public exhibition of the proposals was originally planned for April 2020. Owing to the Covid-19 pandemic, the public exhibition was cancelled until it could be held safely. In order to ensure that a suitable consultation could still be held, it was changed from being just a physical exhibition to being one that was held both physically and online, in order to ensure that the exhibition could still be held whilst providing an opportunity for as many people to review the proposals and provide comment as possible.

- 4.10. The virtual consultation was held between Thursday 13 August and Thursday 3 September. The physical exhibition supplemented this virtual consultation, and provided an opportunity for people to attend if they wished to discuss the proposals in person. It required those who wished to attend to book a timeslot, so that the number of attendees could be closely managed and enable the project team to ensure social distancing was maintained. The simultaneous provision of an online exhibition (with feedback opportunities) was included as part of the public exhibition ensured that those who were unable to attend, or obtain a timeslot that suited them, could still view the proposals and respond with their views.
- 4.11. Overall 91 responses were received, with 61% of the proposals supportive in principle of the proposed development of the site. Residents raised concerns regarding traffic generation and speed limits along Ford Road, concerns over the suitability of an access onto Ford Road, impacts upon local wildlife, concerns about parking provision, and impacts on local services. Accordingly all of these issues have been examined in detail through the production of technical reports in order to analyse the proposals and produce the most appropriate scheme that addresses these concerns.
- 4.12. The results and further details of the exhibition can be found in the Statement of Community Involvement that has been submitted as part of the application package.

5. Proposals

- 5.1. The application seeks outline planning permission with all matters reserved except for access. The proposals can therefore be described as follows:

“Outline application for the development of 90 dwellings and associated amenity land on Land at Ford Road, Arundel, with all matters reserved except for access”

- 5.2. The application proposes a new road access from Ford Road into the site in the form of a standard priority junction. There will also be emergency access into the site from Dalloway Road to the north west of the site. This access point will be secured from use by regular vehicular traffic using locked bollards, but will remain wholly accessible for pedestrians and cyclists.
- 5.3. The main access from Ford Road will lead up to a high quality residential scheme comprising a range of dwellings sizes, types and tenures, including the delivery of a policy compliant level of affordable housing. The internal road will curve south within the site from the entrance point in order to run through the south of the existing tree belt within the site, and will run through an existing gap in the trees that can accommodate a road and associated paths.
- 5.4. The proposed residential development on the site includes the provision of 30% affordable housing, provision of a new children’s play area, public access to 5ha of revitalised and landscaped amenity areas. An area of land is identified in the masterplan for the future provision of a new community building, with a service road leading up to it, but the final form of this does not form part of these proposals as the actual requirements are yet to be defined.

6. Planning Policy

- 6.1. This section provides a summary of the relevant planning policy as set out by the National Planning Policy Framework (NPPF), the Development Plan and any other relevant guidance and evidence base documents.
- 6.2. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory Development Plan for Arun District Council (ADC) comprises of the following:
- Arun Local Plan 2011-2031 (adopted 2018)
 - Arundel Neighbourhood Plan 2, (adopted January 2020).
 - SPD11 Arun Parking Standards (2020)
 - SPD12 Open Space, Playing Pitches & Indoor & Built Sports Facilities.
- 6.3. Made Neighbourhood Plans form part of the Development Plan; the Arundel Neighbourhood Plan 2 was made as of January 2020, and is directly relevant to the application site.
- 6.4. The National Planning Policy Framework 2019 (NPPF) is a significant material planning consideration in the determination of any application.
- 6.5. Several relevant Supplementary Planning Documents have also been adopted which add further detail to the Development Plan and are a material consideration in the determination of applications.

The National Planning Policy Framework

- 6.6. On 19 February 2019, the latest NPPF was published. This replaced the July 2018 update, which in turn replaced the original 2012 NPPF. As set out in paragraph 212, the NPPF is a material consideration which should be taken into account in dealing with applications from the date of its publication. It therefore immediately replaces the 2018 version.
- 6.7. The NPPF sets out the Government's policies for the planning system and maintains that a presumption in favour of sustainable development remains at the heart of the Framework (paragraph 10).
- 6.8. Paragraph 7 makes clear that "*The purpose of the planning system is to contribute to the achievement of sustainable development*", which comprises 3 overarching objectives (paragraph 8), namely an economic, social and environmental role.

- 6.9. With regards to the presumption in favour of sustainable development, paragraph 11 states that, for decision making, this means:

*“Approving development proposals that accord with an up-to-date Development Plan without delay; or
where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- *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”.*

- 6.10. For the purposes of paragraph 11, Footnote 7 states that Local Plan policies will be considered out of date where a five year supply of housing cannot be demonstrated or the Housing Delivery Test indicates that the delivery of housing was substantially below the requirement over the previous three years.

- 6.11. At paragraph 38 LPAs are required to “*approach decisions on proposed development in a positive and creative way*”. This goes on to state that decision makers at every level should “*seek to approve applications for sustainable development where possible*”.

- 6.12. Chapter 5 relates to the delivery of a sufficient supply of homes, with paragraph 58 identifying that to achieve the Government’s objective of “*significantly boosting the supply of homes*”, it is important that a sufficient amount and variety of land can come forward where it is needed.

- 6.13. Paragraph 73 requires LPAs to identify and annually update a supply of specific, deliverable sites sufficient to provide a minimum of 5 years’ worth of housing against their housing requirement, or local need when policies are more than 5 years old. It also states that the following buffer should be applied:

- a) *5% in all cases to ensure choice and competition in the market for land; or*
- b) *10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- c) *20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.*

- 6.14. For the purposes of part c, footnote 39 makes clear that from November 2018, this will be measured against the Housing Delivery Test. In instances where the test is not passed, paragraph 75 states that LPAs must prepare an action plan to assess the causes and identify actions to increase future delivery.

- 6.15. In February 2020 updated housing delivery test results were published, setting out whether or not each LPA had passed the relevant tests. This demonstrates that Arun has delivered 68% of its required housing over the past 3 years. As a result, a 20% buffer must be applied to their housing target to address past under-delivery. This is examined further below.

- 6.16. Chapter 11 focuses on the need to make an efficient use of land. Paragraph 117 identifies, except where there is a conflict with the NPPF that policies and decisions should *“promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”*
- 6.17. Paragraph 122 relates to the achievement of appropriate densities, advising that development should (summarised) make an efficient use of land taking into account matter such as the need for different types of housing, local market conditions, desirability of maintaining an area’s character and the importance of securing well designed and healthy places.
- 6.18. Paragraph 123 goes on to state that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important to avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. Furthermore, with regards to densities, paragraph c states that applications should be refused where there are considered to fail to make an efficient use of land taking into account the advice in the NPPF.
- 6.19. Chapter 12 relates to achieving well designed places. This focuses on the importance of creating high quality places, recognising that good design is a key aspect of sustainable development, creates better places to live and work, and helps make development acceptable (paragraph 124).
- 6.20. Paragraph 127 goes on to state that decisions and policies should ensure that developments:
- “a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

Planning Practice Guidance (PPG)

- 6.21. The Government published the PPG in 2014 and has updated relevant parts as appropriate since then. The PPG provides further detailed guidance to accompany the NPPF, including on matters such as climate change, design, flood risk, health and wellbeing, Local Plans, noise, transport and the calculation of housing needs using the standard methodology. Relevant sections, as applicable to the scheme have been considered and will be referred to through this planning statement.

Adopted Development Plan

- 6.22. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs LPAs to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise. Section 38(3) of the Act provides that the Development Plan includes the “*development plan documents (taken as a whole) which have been adopted or approved in relation to that area*”.
- 6.23. The adopted Development Plan covering any development proposals on the site comprises of the Arun Local Plan 2011-2031 and the Planning Policies set out in the Arundel Neighbourhood Plan 2, (adopted January 2020).

Arun Local Plan 2011-2031 (2018)

- 6.24. The Arun Local Plan was adopted in 2018 and covers the period to 2031. Relevant policies, as applicable to this development, are summarised below and addressed in the following sections of this statement.

SD SP1 – Sustainable Development

- 6.25. *When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework*

SD SP1a – Strategic Approach

- 6.26. *the spatial strategy for Arun District to 2031 is to;*
- *enable development that recognises the sustainable and historic character of the town of Arundel with its historic buildings set at the foot of the South Downs.*
 - *provide for the housing needs of the community by delivering 20,000 homes of an appropriate scale and tenure*
 - *Retain and enhance natural environment resources, including biodiversity*

SD SP2 – Built-up Area Boundary

- 6.27. *Built Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan*

C SP1 – Countryside

- 6.28. *Outside the Built-Up Area Boundaries land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside where it is:*
- *for quiet, informal recreation; or*
 - *for green infrastructure; or*
 - *for road and/or cycle schemes; or*
 - *in accordance with other policies in the Plan which refer to a specific use or type of development*

LAN DM1 Protection of landscape character

- 6.29. *Development throughout the plan area should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas. The historic character and development pattern of settlements within the District should be respected, taking into account their distinct identity and setting*

LAN DM2 The Setting of Arundel

- 6.30. *Development will not be permitted within the area identified on the Policies Map which would adversely affect the views of the town of Arundel, its Castle, Cathedral and its special setting. Any development, including the proposed A27 Arundel bypass, will be of a high design standard that reflects the quality of the landscape and the setting of Arundel. No development will be permitted, particularly within the area shown on the Policies Map, which would adversely affect the rural views outwards from the town*

H SP1 – The Housing Requirement

- 6.31. *Within the plan period 2011 – 2031 at least 20,000 new homes will be accommodated in the District. Additional non-strategic allocations will be made across the District through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans*

H DM1 – Housing Mix

- 6.32. *The Council will seek a mix of dwelling types and sizes, to include affordable housing units, that adhere to the latest Homes and Communities Agency design guidance. For developments of 11 units or more the Council shall require a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations.*

6.33. *The tenure mix for development schemes shall be negotiated on a case by case basis taking any necessary viability considerations into account. Developers shall have regard to the most up to date version of the SHMA.*

6.34. *The Council will particularly encourage the development of self-build homes on appropriately sized, serviced sites in the first instance or on appropriately sized sites that are capable of being serviced. Such sites can be provided either as part of a development scheme or on an individual basis.*

6.35. *Over the Plan period a proportion of the housing provided should be of a type that meet the needs of older people, as identified in the most recent SHMA. Such housing could be provided as part of the general mix of one and two bedroomed homes but should be designed to meet the needs of older people*

6.36. AH SP2 – Affordable Housing

6.37. *For all developments of 11 residential units or more the Council will require a minimum 30% of the total number of units proposed on site to be provided as affordable housing on the same site in the first instance.*

D SP1 – Design

6.38. *All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development*

D DM1 – Aspects of Form and design quality

6.39. *When considering any application for development the Council will have regard to the following aspects:*

1. *Character*
2. *Appearance/attractiveness*
3. *Impact*
4. *Innovation*
5. *Adaptability*
6. *Crime Prevention*
7. *Trees and Woodland*
8. *Solar Gain*
9. *Public Realm*
10. *Layout – Movement*
11. *Layout – legibility*
12. *Public Art*
13. *Density*
14. *Scale*
15. *Aspects of form and design quality*

D DM2 – Internal Space Standards

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

ECC SP1 Adapting to Climate Change

- 6.41. *The Council will support development which is located and appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding; water stress; health impacts as a result of extreme temperatures and a decline in the quality of habitats and richness of biodiversity.*
- 6.42. In order to achieve this, development must be designed to take account of the following issues:
- a. *Location (in relation to flood risk and vulnerability to coastal erosion);*
 - b. *Water efficiency;*
 - c. *Shade, cooling, ventilation, solar gain;*
 - d. *Connectivity to the green infrastructure network;*
 - e. *Layout and massing;*
 - f. *Resilience of buildings and building materials to extreme weather events; and*
 - g. *Capacity of drainage systems and incorporation of Sustainable urban Drainage Systems (SuDS)*

ECC SP2 Energy and climate change mitigation

- 6.43. *All new residential and commercial development (including conversions, extensions and changes of use) will be expected to be energy efficient and to demonstrate how they will:*
- a. *Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;*
 - b. *Use design and layout to promote energy efficiency; and*
 - c. *Incorporate decentralised, renewable and low carbon energy supply systems, for example small scale renewable energy systems such as solar panels.*
- 6.44. *All major developments must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable. The Council will consider 'allowable solutions' where it is clearly demonstrated that the provision of on-site renewable or low carbon energy generation is unviable or not feasible.*

OSR DM1 – Open Space, sport, & recreation

- 6.45. *In new developments, housing development will be required to contribute towards:*

- 6.46. *Open space provision in accordance with guidance set out in the current Open Space Study. In some parts of the District open space provision is identified as being sufficient in terms of quantity. Therefore, provision of new open space is not deemed necessary but what is needed is to seek contributions for quality improvements and/or new offsite provision in order to address any future demand.*
- 6.47. *Local Green Space is not identified in this Local Plan but will be designated in Neighbourhood Plans in circumstances where the criteria in paragraphs 99 and 100 of the National Planning Policy Framework are met*

T SP1 Transport and Development

- 6.48. The Council will ensure that development: provides safe access on to the highway network; contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network.
- 6.49. *The Council will support transport and development which:*
- *Is designed to reduce the need to travel by car by identifying opportunities to improve access to public transport services and passenger transport services whilst making provision for safe access to the highway network through improvements to the existing road network and the promotion of vehicles which use low-carbon energy*
 - *Is supported by an effective and deliverable Transport Assessment which demonstrates that the transport effects of development on the local and strategic road network can be satisfactorily mitigated and a Travel Plan, which is effective and deliverable*
 - *Explains how the development has been designed to:*
 - *i. accommodate the efficient delivery of goods and supplies;*
 - *ii. give priority to pedestrian and cycle movements and have access to high quality public transport facilities;*
 - *iii. create safe and secure layouts for traffic, cyclists and pedestrians whilst avoiding street clutter;*
 - *iv. incorporate facilities for charging electric and plug-in hybrid vehicles (where charging facilities are to be omitted from the development, evidence of market demand and viability must be provided); and*
 - *v. consider the needs of people with disabilities by all modes of transport*

T DM1 Sustainable Travel and Public Rights of Way

- 6.50. *Sustainable Travel and Public Rights of Way New development must ensure ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and access to public transport and community transport services where a need has been identified. Access to alternative modes of transport including public transport services, the public right of way and cycle networks, must be available and accessible to all members of the community.*

ENV DM3 Biodiversity Opportunity Areas

- 6.51. *Development shall:*
- a. Retain and sympathetically incorporate locally valued and important habitats, including wildlife corridors and stepping stones*
 - b. Be designed in order to minimise disturbance to habitats*
- 6.52. *Development proposals that do not reasonably address opportunities for enhancing these through their design, layout and landscaping or access/management shall not be permitted. Where a development scheme would result in a habitat loss, mitigation measures will be proposed as part of the proposed scheme and such measures agreed with the Local Planning Authority prior to the determination of any planning application. Within Biodiversity Opportunity Areas (BOAs) identified on the Policies Maps or where likely to have an impact on species or habitats within the BOAs, any application for planning permission shall include a properly conducted survey of the presence of that species and habitat and impact(s) that development may have on the BOA*

ENV DM4 Protection of trees

- 6.53. *Development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order(s), (TPO) identified as Ancient Woodland, in a Conservation Area or contributing to local amenity, will not be damaged or destroyed now and as they reach maturity, unless development:*
- a. Would result in the removal of one or more trees in the interests of good arboricultural practice. This shall be demonstrated by the developer following the advice of a suitably qualified person which shall be guided by BS 5837 (2012). Details of any advice received having regard to BS 5837 (2012) shall be submitted, in writing, as part of a planning application; or*
 - b. Would enhance the survival and growth prospects of other protected trees;*
 - c. The benefits of the proposed development in a particular location outweigh the loss of trees or woodland, especially ancient woodland*
- 6.54. *Where there are existing trees on or adjacent to a development site, developers shall be required to provide:*
- d. Land and tree surveys*
 - e. A tree constraints plan*
 - f. An arboricultural impact assessment to include a tree protection plan and arboricultural method statement*
- 6.55. *These will ensure that development is planned to take a comprehensive view of tree issues at an early stage in the design process and that development works do not have a negative impact on existing trees.*

ENV DM5 Development and biodiversity

- 6.56. *Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designated or not). Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement*

W DM2 Flood Risk

- 6.57. *Development in areas at risk from flooding, identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment (SFRA) , will only be permitted where all of the relevant criteria have been satisfied, including:*
- 6.58. *A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall*

QE DM1 Noise Pollution

- 6.59. *Residential development likely to experience noise from road, rail or air must:*
- a. Be supported by a noise exposure category (NEC) assessment and designed to ensure that residents will not be adversely affected by noise.*
 - b. Consider both the likely level of exposure at the time of application and any increase that might be reasonably expected in the foreseeable future*

QE DM3 Air Pollution

- 6.60. *All major development proposals will be required to assess the likely impacts of the development on air quality and mitigate any negative impacts by:*
- a. Ensuring the development is located within easy reach of established public transport services;*
 - b. Maximising provision for cycling and pedestrian facilities;*
 - c. Encouraging the use of cleaner transport fuels on site, through the inclusion of electric car charging points; and*
 - d. Contributing towards the improvement of the highway network where the development is predicted to result in increased congestion on the highway network.*

Supplementary Planning Documents

- 6.61. ADC have two Supplementary Planning Documents that are relevant to this proposal – SPD11 *Arun Parking Standards* (2020), and SPD12 *Open Space, Playing Pitches & Indoor & Built Sports Facilities*. Both have been referred to in the preparation of the proposals. The Arun Design Guide (January 2020) has also been utilised in preparing the indicative layout and masterplan for the site.

Arundel Neighbourhood Plan

- 6.62. The original Arundel Neighbourhood Plan was adopted in 2014. An updated Plan - the Arundel Neighbourhood Plan 2 (ANP2) 2018-2031 - was adopted in January 2020 and was prepared to both replace existing out-of-date policies and supplement those that were already in place. Both Plans contain policies specific to the site and Arundel, as the site falls within the area covered by the Arundel Neighbourhood Plan Area. Therefore the ANP2 is a material consideration in the determination of this application.

Arundel Neighbourhood Plan 2018-2031 Policies

AR1 – Arundel Built up Area Boundary

- 6.63. *The Neighbourhood Plan defines the Built Up Area Boundary of Arundel, as shown on the Policies Map, for the purpose of applying policies SD SP2 and C SP1 of the Arun Local Plan.*

AR2 – Land off Ford Road

- 6.64. *The Neighbourhood Plan allocates 8.97 Ha of Land Off Ford Road for a mix of residential, community facility and green infrastructure uses as shown on the Policies Map. Development proposals will be supported, provided the following key requirements are met:*
- a. The developable land for residential uses comprises no more than 3.9 Ha lying within the Built Up Area Boundary of Policy AR1;*
 - b. The residential scheme delivers approx. 90 dwellings comprising a mix of open market, affordable and Community Land Trust homes in accordance with Local Plan policies with an emphasis on homes suitable for first time buyers or those looking to rent their first home;*
 - c. Development proposals incorporate and safeguard land for the future provision of a D1 and/or D2 community use(s) to be agreed with the Town Council;*
 - d. The layout and heights of buildings have full regard to the Local Plan policy requirements in relation to the location of the land within the setting of:*
 - o the South Downs National Park;*
 - o of Arundel; and*
 - o of the heritage assets at Tortington Priory;*

- e. *A biodiversity strategy is prepared and approved by the local planning authority to incorporate measures that ensure no net loss of effective foraging and roosting habitat for the Bewick's Swan population of the Arun Valley Special Protection Area in accordance with Local Plan policies and deliver a net gain in general biodiversity value, where possible, on site;*
- f. *The road access to the developable land is made from a new junction on Ford Road in a location and of a type to be agreed with the highways authority, but with an emergency vehicle access to Dalloway Road;*
- g. *Pedestrian and cycling access points are provided off Ford Road, Priory Lane, Dalloway Road, High Ridge Close and Priory Road of a specification to be agreed with the highways authority;*
- h. *Provision is made within the scheme layout to secure public footpath connectivity through the site between Dalloway Road and Ford Road as part of the wider Green Infrastructure Network defined by Policy AR9;*
- i. *All trees subject to a Tree Preservation Order are retained and protected and all other mature trees and hedgerows within the site are retained unless their removal is essential, and the minimum required to facilitate an efficient development layout;*
- j. *The remaining non-developable land within the gross site area is set out as a combination of formal and informal recreation parkland and incorporates a Local Equipped Area for Play that is conveniently located for all the new residential uses and that is accessible to children from the Torton Hill area;*
- k. *A sustainable drainage strategy is prepared and approved by the local planning authority to address the effects of surface water run-off within and adjoining the land;*
- l. *The layout enables the scheme to connect and integrate with the existing community at Torton Hill and also reflects the common grid street pattern and profile of Torton Hill, notably the use of front gardens, boundary walls and street trees, with an emphasis of east-west streets to encourage optimum design for passive solar design;*
- m. *The building materials reflect those common to the neighbourhood area; and*
- n. *The layout has regard to the need for utility providers to access infrastructure on the land for future maintenance and upgrading.*

Arundel Neighbourhood Plan (2014-2029) Policies

Policy 3 – Housing supply

- 6.65. *The Neighbourhood Plan provides for the development of a minimum of 60 homes for completion in the period from 1 April 2014 to 31 December 2029 on sites allocated and identified for future allocation in policy 4; and supported in policy 5; and on windfall sites. Projected actual dwellings completions, which may result in delivery of a higher number of dwellings, will be refined on a site by site basis as detailed design schemes are prepared.*

Policy 4: Housing Site Allocations

- 6.66. *Land at Ford Road is identified for future allocation through plan review, following the flood risk Exception Test being passed, and subsequently to be delivered in the period 2020-2029.*

Policy 6 – Transport, Access & Car Parking

6.67. *The Neighbourhood Plan will support proposals to:*

- *promote walking, cycling and the use of public transport, including making proper provision for those with mobility impairment;*
- *promote, protect and maintain the local footpath and cycle path network, including the Monarch's Way in conjunction with the South Downs National Park Authority, West Sussex County Council, Arun District Council and the Ramblers Association, and in doing so encourage walking and cycling for leisure especially by visitors to the area;*
- *alleviate traffic problems in the town with the implementation within the plan period of an A27 improvement scheme; and*
- *develop a Parking Strategy for Arundel to manage car parking spaces for residents and visitors*

7. The Planning Balance

7.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 provides that all decisions must be determined in accordance with the Development Plan, when taken as a whole, unless other material considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development.

7.2. This section identifies the key issues that are material to the planning balance required in respect of this scheme and presents the case in favour of the grant of planning permission.

7.3. As set out below, it is the case that this site is a sustainable, unconstrained site, which has a direct relationship to existing built form and represents sustainable development

Principle of Development

7.4. The Arundel Neighbourhood Plan 2018-2031 (ANP2) ('made' January 2020) allocates the site for development through Policy AR2. This allocation identifies that the site will deliver approximately 90 dwellings on approximately 4ha of the site.

7.5. As the ANP2 has been formally 'made' and adopted more recently than the Local Plan, the policies contained within it supersede those where there is conflict between the Local Plan and the Neighbourhood Plan. In this instance, whilst the settlement boundary set out in the adopted Local Plan does not include the site, the ANP2 amends the settlement boundary to include part of the site. Accordingly the settlement boundary shown in the ANP2 is considered to be the adopted settlement boundary. The proposed built form on the site falls within this area, and as such is acceptable in principle.

7.6. Additionally, Policy H SP 1 – The Housing Requirement of the Local Plan identifies that 20,000 new homes are required over the plan period, and in order to meet this requirement non-strategic allocations will be made "through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans". As the allocation of the site has been made through a review of the existing Neighbourhood Plan for Arundel, the allocation of the site in the ANP2 is in accordance with the Local Plan policies.

7.7. The principle of residential development on this site was identified in the pre-application response as clearly being in accordance with the adopted District-wide development plans and the policies in the ANP2 that are in place. Therefore, subject to compliance with other policies of the Development Plan, the proposed development of the site for housing is considered acceptable.

Design, Layout, and Appearance

- 7.8. Whilst this application is an outline application with all matters reserved apart from access, the proposals have been prepared with an illustrative masterplan, setting out how development on the site can achieve the proposed quantum of housing whilst adhering to the principles set out in the relevant policies (most notably Policy AR2 of the ANP2).
- 7.9. Keeping development away from the eastern part of the site and ensuring that any built form remains in the settlement boundary, is located within Flood Zone 1, and occupies no more than the approximately 4ha area identified in policy ANP2 policy, were key considerations in preparing the proposals. The location of development within the site that was submitted as part of the pre-application enquiry was determined to be acceptable, and accordingly the location of development as shown in this application has retained the same locations.
- 7.10. Feedback was received at pre-application regarding the location of dwellings lacking a sense of arrival, that the junction onto Ford Road should not be over engineered so that it is in keeping with the surrounding character, and that the development should be sure not to intrude into the root protection zones of the existing protected trees. The proposals should also include a suitably sized central Green (larger than that submitted at pre-application), and that whilst this is an outline application and precise housing detail will not be determined as part of it, parameter plans should be provided so that the height of dwellings can be determined.
- 7.11. Accordingly this feedback has been adhered to, and the illustrative masterplan and Design and Access Statement set out how dwellings have been positioned so that they would present more of a sense of arrival, the central Green area of the proposals has been enlarged, and parameter plans setting out the prospective sizes of the dwellings on the indicative masterplan have been included. As a result of the inclusion of a larger Central Green, and the restriction placed upon where development can be located due to the settlement boundary location, the density of the development has risen from 23 dwellings per hectare (dph) (as shown at pre-application stage) to 24 dph. However, given that this is such a small change, this is considered to be acceptable.
- 7.12. The proposals have also referred to the Arun Design Guide, in order to ensure that the appearance of the buildings in the illustrative plans is in keeping with the local character of the area, and the layout shown has also been revised to ensure that there is minimal incidence of intrusion into root protection zones of any of the existing trees on the site.
- 7.13. Access points have been included in the proposals for pedestrians and cyclists in accordance with Policy AR2, with emergency vehicle access provided onto Dalloway Road to the north west of the site
- 7.14. The proposals also provide vehicular access and land on the north eastern part of the site for the provision of a community building (the precise nature of which will be determined by Arun Town Council). This has been deliberately located in close proximity to the existing allotments and the area of open space to allow any future building which is developed to be readily accessible. The exact nature of this building has not been defined at this stage and as such it is not included within this planning application.

- 7.15. Public Open Space has been shown in the illustrative masterplan and detailed in the Design and Access Statement. The proposal will include approximately 4ha of public open space which will be managed moving forwards by the Arundel Community Land Trust.
- 7.16. The proposals are therefore in accordance with the Policy detail set out in AR2, and the guidance provided in the Arun Design Guide (2020)

Landscape and Visual Impact Assessment

- 7.17. A detailed Landscape and Visual Impact Assessment (LVIA) has been conducted by Davies Landscape Architects, in order to allow a landscape-led approach to be utilised by the proposals.
- 7.18. The LVIA considered the existing landscape and visual baseline to understand the key landscape constraints and opportunities that affect the site. This in turn has allowed for them to be taken into account in the iterative design and masterplanning process. Consequently, negative development effects could be identified, and mitigation measures set out to reduce any adverse impacts that would be caused, along with the inclusion of enhancement measures to offset any harm identified.
- 7.19. The precise location of development has been based upon the existing landscape framework and the historic core of Arundel. The views towards the historic core, the existing landscape framework, and the existing trees and hedgerows were all identified as key aspects to retain and enhance. Accordingly all of these aspects have been retained in the proposals. The LVIA also identified that opportunities existed for reinstating lost and weakened boundaries to enhance biodiversity, connectivity, habitat potential, and screening of the site from wider views.
- 7.20. Consequently the landscape proposals for the site feature large landscape buffers (to cone the view towards the castle) and ensure a strong landscape edge to the development. The buffers also enable opportunities to interlink with several green corridors and deliver enhancements through the provision of species rich grassland, native hedgerow, and wetland features towards the east of the site. The buffers also provide the opportunity enhance connectivity with the adjoining neighbourhood and habitats.
- 7.21. With regard to visual amenity, there will be limited change to the character and views of the area. There will be changes experienced immediately adjacent to the site to the north and in sections along Priory Lane, but aside from this, there will be limited change. To observers arriving to Arundel along Ford Road, the proposals will be in keeping with the character and expectations of arrival to a settlement. Development has been excluded from the cone of view towards the historic core of the town from the site, and opportunities for members of the public to experience this view enhanced through the provision of public open space on the site.
- 7.22. Overall the landscaping proposals prepared are considered to provide enhancements and improvements to the current setting, landscape quality, value and longevity of the site. Simultaneously they will deliver improvements to the visual quality and setting, and provide a new well-defined attractive, and transitional boundary to the town.

Housing Need and Land Supply

- 7.23. Arun District Council have committed to the delivery of at least 20,000 home over the Plan period of 2011-2031 (at an average of 1,000 dwellings per annum). The most recently published Authority Monitoring Report (published December 2019 for the period 2018-2019) identifies that delivery of housing on sites identified in the Local Plan has been slower than anticipated. The current housing land supply position is that Arun has 4.7 years of housing land supply in place. However, given the slow delivery rates, it calculates that if a 20% buffer were to be applied, this would leave Arun with 3.7 years housing land supply
- 7.24. The Housing Delivery Test is a metric applied by Government in order to assess housing delivery. In the 2019 measurement (published February 2020) Arun was adjudged to have delivered 68% of the required housing delivery. Therefore the 20% buffer should be applied. Accordingly it should be considered that Arun were correct in calculating their 5 year housing land supply position with a 20% buffer in anticipation of an insufficient volume of housing delivery, and that 3.7 years should be considered to be the most relevant and up to date housing land supply position.
- 7.25. It should also not be overlooked that since the formulation and adoption of the current Local Plan, the Government have introduced a Standard Method for calculating housing need. Under the currently adopted method, this increases the volume of housing required in the District to 1,368 dwellings per annum. Under the proposed amendments to this methodology, Aruns' housing requirement would rise to 2,063 dwellings per annum.
- 7.26. Therefore it can clearly be seen that there is an overriding need for housing to be delivered in the District. The proposals would therefore provide a suitable boost to housing provision in the District and go some way to meeting this need.

Affordable Housing

- 7.27. The illustrative scheme has been prepared in accordance with the 30% affordable housing provision set out in policy AH SP2, with the provision of 27 affordable dwellings. Following on from the feedback received from the pre-application, the masterplan has been prepared to reflect the identified affordable housing need in Arun, and as such has been prepared with an affordable housing provision as follows:

	Rented	Intermediate
1 bedroom unit	6	2
2 bedroom unit	10	3
3 bedroom unit	4	2
TOTAL	20	7

Heritage Impact

- 7.28. Given the historic nature of the settlement of Arundel and the presence of the Grade I listed Arundel Castle overlooking large swathes of the settlement, a Heritage Statement was conducted in order to assess the impact the proposals would have on the setting of the historic settlement of Arundel.
- 7.29. In terms of nearby heritage assets, the Scheduled Ancient Monument of the Tortington Augustinian priory and ponds, and the Grade II listed Tortington Priory Barn are both located to the south of the site. The assessment has found that due to the distance of the site from the castle, and the proposed use of appropriate landscaping and planting, the proposals would not negatively impact upon the Grade I castle or the Arundel Conservation Area.
- 7.30. The presence of the Scheduled Monument and the Grade II Tortington Priory have been suitably acknowledged and considered in the design of the proposals. With development being set back from Ford Road and Priory Lane, effort has been made to avoid any impact upon the heritage assets and avoid encroachment towards Tortington Priory to the south. When considering the design of the proposals, the proposed landscaping and planting identified to screen the development and soften the edges of the development as it transitions into countryside at the urban fringe, would further lessen any potential impact on the significance of any of the heritage assets or their settings.
- 7.31. Accordingly, the heritage assessment has found that the proposals, in conjunction with the proposed landscaping and planting, would not result in any harm to the heritage assets and accord with Local and National Planning policies regarding the protection and conservation of heritage assets. Further detail can be viewed in the Heritage Assessment that has been submitted as part of this application.

Ecology

- 7.32. In line with the feedback received at the pre-application stage and in accordance with the requirement of Policy AR2 to establish an ecological baseline and allow a biodiversity strategy to be established, an Ecological Assessment Report has been conducted on the site. The report evaluates the potential impacts of the proposals and sets out the measures that have been designed as part of the proposals to avoid and/or mitigate any resultant impacts.
- 7.33. The assessment found that there will be no direct or indirect impacts upon areas designated for wildlife by the proposals, and that the habitats lost as a result of the proposals have been found to be of a low value ecologically (which is a typical occurrence where land has been actively farmed). Therefore the proposals have ensured the retention of the most valuable ecological features, and will also ensure their enhancement in order to ensure that there is no detrimental impact on the most important ecological features.
- 7.34. The site has been found to support the following species that are either protected or of conservation interest: badgers; bats; birds; dormice; reptiles/amphibians. Accordingly the report has set out the necessary mitigation, avoidance and enhancement measures that will ensure that the risk of impact to any of these species is removed.

- 7.35. The report also details recommendations for the delivery of enhanced areas for wildlife through the mitigation and landscaping process, and would therefore enable the development of the site to deliver net gains for biodiversity. These recommendations have been adhered to in the preparation of the illustrative masterplan and landscaping works that are proposed.
- 7.36. Details of the mitigation measures and biodiversity enhancements that can be achieved as part of the recommended approaches can be found in the Ecological Assessment submitted as part of this application package.

Highways and Transport

- 7.37. The application is supported by a Transport Assessment from Ardent Engineers, who have examined the sustainability of the site from a transport perspective, including the preparation of a Transport Scoping Note, the conducting of a Stage 1 road safety audit with respect to the proposed junction onto Ford Road, undertaken engagement with West Sussex County Council Highways, and assessed the proposed provision of car and cycle parking spaces on site.
- 7.38. The proposals include a new vehicular access onto the site from Ford Road, as there are currently no vehicular access points onto the site. The proposed access point is a priority junction onto Ford Road. This approach has been determined following pre-application consultation with both Arun District Council and West Sussex County Council Highways.
- 7.39. The capacity of the junction has been assessed as part of the Transport Assessment, with junction capacity modelling conducted. The analysis found that the junction would operate with ample space capacity at peak periods in future scenarios.
- 7.40. There has also been ongoing discussion between WSCC Highways over the speed limit on Ford Road around the junction. Whilst public feedback received has indicated a preference for a reduction in the speed limit on Ford Road around the proposed junction, WSCC Highways do not support such a move. Given the sightlines available, the proximity to the settlement, and the presence of a 30mph speed limit further north on Ford Road, WSCC do not support any amendment to the speed limit on Ford Road. Consequently, the proposals do not include any amendment to the speed limit.
- 7.41. The internal layout set out on the illustrative masterplan has been designed using WSCC design guidance and parameters, and has been tested for visibility splays and with swept path analysis. All have been found to accord with the respective requirements.
- 7.42. The parking provisions proposed on the site have been prepared in accordance with the West Sussex County Council Guidance on Parking at New Developments (May 2019), and the Arun Parking Standards SPD (Jan 2020).
- 7.43. Pedestrian and cycle access into the site will primarily come from Dalloway Road. Currently, no footpaths exist alongside Priory Road or Ford Road, however they are present to the north of the site along Dalloway Road and within the adjacent residential development
- 7.44. Further detail can be found in the Transport Assessment submitted as part of this application package.

Arboricultural Impact

- 7.45. In order to ensure that the proposals would not adversely impact on the existing trees on site, an Arboricultural Implications Report has been conducted in order to ensure that the proposed access route and location of development would not result in detrimental impact upon the existing trees on site. This is particularly relevant as the central tree belt that runs north to south within the site is subject to a group Tree Preservation Order.
- 7.46. The Arboricultural survey conducted and the resultant report produced have been used to ensure the areas of development within the site are suitably located outside of the root protection zones of the proposals, and where there are intrusions they are only minor and will not impact upon the health or lifespan of the tree. All protected trees, veteran trees, and the trees subject to an upcoming Tree Preservation Order (TPO) will be retained on site, and all potential veteran trees and unprotected trees of high or moderate quality will also be retained.
- 7.47. Following engagement with ADC's Tree Officer, the gap in the central tree belt that exists towards the northern end of the TPO cluster was identified as being too narrow for a road and suitable pedestrian access to be suitably accommodated. Therefore in conjunction with the Tree Officers input, the southern end of the area of protected trees was identified as having a gap within it that is of a suitable width for a road to pass through without negatively impacting the trees present either side. Accordingly this route has been chosen for road access to pass through to access the main part of the site.
- 7.48. Further detail regarding the trees present on the site, the route protection zones, and the category of each individual tree present can be seen in the accompanying Arboricultural Implications Report, which includes a Tree Protection Plan and a Tree Survey Schedule.

Noise Assessment

- 7.49. In line with the pre-application feedback received, a detailed noise survey has been conducted and submitted as part of this application to ensure that neighbouring residential amenity will not be negatively impacted.
- 7.50. The report has examined the existing noise levels found on site, and calculated the expected noise levels that would be generated by a 90 dwelling development. The assessment has found that the development itself can be prepared and designed with suitable ventilation and glazing specification that will result in no impact upon potential residents of the site. The noise report has also determined that through suitable control measures during the construction phase, impact on neighbouring residential amenity can be avoided.
- 7.51. Overall the report has determined that the site is suitable for residential development (subject to the appropriate recommendations set out in the report being followed). Further detail can be found in the Noise Assessment submitted as part of this outline planning application.

Air Quality

- 7.52. In line with the pre-application feedback received, an Air Quality Assessment has been conducted to ascertain the existing air quality of the area, assess the sites suitability for development, and assess the potential impact on the local air quality during both construction and operational phase.
- 7.53. The Site is not located in or adjacent to an Air Quality Management Area. The site has measured mean annual NO₂ concentrations, and found that the recorded levels have been below the National Air Quality Objective Levels throughout the last 4 years.
- 7.54. The traffic generation as a result of 90 new dwellings being developed on the site is not considered to be significant. The air quality for future residents will therefore remain good without any mitigation measures being necessary. It is identified that there is the possibility that dust and other such particulates could be impactful during the construction phase of the development, however with the proposed mitigation measures set out, the impacts will not be significant.
- 7.55. The report therefore concludes that overall there are no air quality constraints on the proposed development. The proposed layout and existing conditions in the area are considered to result in particulate concentrations that are well below the relevant objective levels, and the air quality for residents is considered to be 'good'. Having considered the future construction of the A27 bypass, it has been concluded that this measurement will not change. Accordingly, no additional mitigation measures for air quality, beyond those set out in the report, are required on site. Further detail can be viewed in the Air Quality Assessment submitted as part of this application.

Flood Risk

- 7.56. Given the size of the site and the location of an area of Flood Zone 3 on the eastern extremity of the Site, a Flood Risk Assessment (FRA) and Drainage Strategy has been conducted and submitted as part of this application.
- 7.57. Given the analysis of the topography, site levels, location of the development, and through hydraulic modelling conducted in consultation with the Environment Agency, the FRA has determined that the proposals will not be at risk of flooding as they are located outside of the area identified as being at risk of a 1 in 100 year event (plus 50% flood outline). In addition to this, flood resilience for the proposals would be further enhanced if all finished floor levels are set 300mm above the tidal 200 year predicted flood level (that is to say that they are set above 4.368m AOD). Accordingly, this approach has been adopted for dwellings shown within the proposed masterplan.
- 7.58. With regard to surface water management, the assessment has found that the site is predominantly classified as being at a 'Very Low' risk of surface water flooding by the Environment Agency. An ordinary watercourse crosses the site from north to south, dissecting the site into two parcels. Water from the western parcel currently drains into this central watercourse which then discharges into the network of ordinary watercourses between Ford Road and the River Arun. Water on the eastern field drains towards Ford Road and gathers in a ditch alongside Ford Road, although some water ponds onsite alongside Ford Road.

- 7.59. The assessment has found that the characteristics of the existing soil are not conducive towards infiltration as the primary drainage mechanism. Therefore the most appropriate surface water drainage strategy is that it is conveyed via a piped network into conveyance swales and attenuation basins prior to discharge at controlled greenfield run off rates. Accordingly the provision of swales has been adopted in the preparation of the plans and they have been located appropriately within the site.
- 7.60. Overall, the FRA has assessed the site, and found that due to the location of the proposed development on the western part of the site, in the part of the site that is categorised as being in Flood Zone 1, the site does not incur any flood risk. The proposals are at low risk of flooding from all sources, including fluvial, tidal, and surface water. The proposals will not result in increased flood risk elsewhere, and the surface water runoff generated by the proposals can be suitably managed.
- 7.61. Further detail can be found in the Flood Risk Assessment and Drainage Strategy submitted as part of this application package

Lighting

- 7.62. Given the sites location near to the South Downs National Park Area of Outstanding Natural Beauty (AONB), and the potential ecological impacts of artificial lighting, a Lighting Strategy Document has been prepared. The document assesses the effect of the lighting of the scheme in order to ensure that the proposals ensure suitable lighting provision for resident safety whilst not negatively effecting the surrounding area.
- 7.63. The Lighting Strategy Document has found that the proposed 6m tall street lighting columns on adoptable roads and the provision of 4m tall columns on non-adoptable and sensitive areas of the site will provide a suitable level of lighting whilst not negatively impacting upon local wildlife or neighbours. The utilisation of low light pollution fittings which retain light spill will be used in order to minimise light spill and minimise the loss of light into the sky or the generation of glare.
- 7.64. Overall the proposals will result in the provision of a lighting scheme that is compliant with highways safety standards, delivers suitable light for pedestrian safety, and does not negatively impact upon the native wildlife. The proposals accord to all relevant British standards and the Institute of Lighting Professionals lighting guidelines. Further detail can be viewed in the Lighting Strategy report submitted as part of this application.

Landscape Visual Impact Assessment

- 7.65. Given the sites location on the edge of the settlement of Arundel, near to the South Downs National Park, and the location of heritage assets to the south of the site, a Landscape & Visual Impact Assessment was conducted. This was in order to assess the existing landscape and the potential impacts that the proposals may have. The assessment was then utilised to help develop the scheme, so that it could be ensured that the proposals were appropriate, and to ensure that a landscape-led approach was followed in order to make the proposals sit harmoniously in the existing landscape.

- 7.66. The assessment found that the existing site experienced some visibility into it, most notably along Priory Lane where the field boundary between the western parcel and Priory Lane was observed to be partially open. The landscape of the site, whilst rural, was not found to be of high value or contribute significantly to the setting of Arundel, and the existing residential development and allotments adjacent to the northern edge of the site lessened the impression of rurality.
- 7.67. The nearby SDNP, of which the closest boundary lies to the west of the site, is defined by ancient woodland. Views of the wider SDNP are not visible from the site, and the site is not visible from the wider SDNP.
- 7.68. The location of the development proposals within the site have been determined and refined as a result of the LVIA. The proposals remain within the identified settlement boundary as set out in the Arundel Neighbourhood Plan 2, and will not result in notable changes to the visual experience and character of the area. It is acknowledged that there will be changes in the visual experience when viewed from directly adjacent to the site, however they are not considered to be out of character or outside the expectation level of someone approaching a town boundary.
- 7.69. The proposals will deliver enhancements to the area through the delivery of landscape buffers that will ensure a strong landscape edge to the development that will interlink with green corridors across the site to enhance connectivity with the existing adjoining neighbourhoods and habitats. This will be particularly prevalent along Priory Lane, where there will be reinstatement and enhancement of hedgerow, and new planting. In combination with the parkland buffer on the southern edge of the site, this will deliver a new high quality setting and settlement boundary.
- 7.70. Overall it has been determined that the proposals provide an opportunity to improve the visual quality and setting of the southern end of Arundel, and provide a new well defined, attractive and transitional boundary to the town. Further details can be observed in the Landscape and Visual Impact Assessment that accompanies this planning application.

8. Conclusion

- 8.1. This planning statement has been prepared on behalf of the Norfolk Estate for:

“Outline application for the development of 90 dwellings and associated amenity land on Land at Ford Road, Arundel, with all matters reserved except for means of access”

- 8.2. The proposals have been examined against the policies of the adopted Local Plan, the adopted Arundel Neighbourhood Plan 2, and the relevant Supplementary Planning Documents. It has been demonstrated that the overall proposals accord with the relevant policies contained therein.
- 8.3. The site is subject to a site allocation for approximately 90 dwellings in the Arundel Neighbourhood Plan 2. It is located in a sustainable location and within the settlement boundary of the settlement of Arundel.
- 8.4. There is an identified housing need across Arun District, with no five year housing land supply currently in place, the Housing Delivery Test having failed to have been sufficiently met, and a likely increase in the volume of housing delivery required through the plan when it is next reviewed. The proposals would not only deliver 90 new dwellings, but of these 30% would be affordable housing, in line with Policy AH SP2. The proposals would therefore greatly assist in providing housing for local people and meeting an identified need
- 8.5. The Site will also deliver a number of public benefits, through the provision of approximately 5ha of public open space, land upon which ADC can deliver a community building, and a new children’s play area.
- 8.6. The application is for outline planning permission only, with all matters reserved except for access. Accordingly detailed highways works have been undertaken, in consultation with West Sussex County Council Highways and Arun District Council, to establish suitable and safe access and egress from the site. As set out in the accompanying Transport Statement, a simple priority junction is the most appropriate solution that will suitably address all necessary technical requirements and deliver a junction onto Ford Road that will integrate seamlessly with the existing road network. Discussions have been held with WSCC Highways over the possibility of reducing the speed limit on Ford Road, however this was deemed to be inappropriate and would not be supported by WSCC Highways. Accordingly no changes in this regard are proposed.
- 8.7. Whilst this application is for outline permission only, following on from feedback received from ADC at the pre-application stage a number of supplementary technical reports have been prepared that demonstrate that the site is suitable for development, and that the site can deliver enhancements to the local area. Notably these include an Arboricultural Implications Report, a Landscape and Visual Impact Assessment, a Flood Risk Assessment, and an Ecology and Biodiversity survey. As requested at the pre-application stage, parameter plans have also been prepared and are included within the application package as part of the Design and access Statement.

Planning Statement

Land at Ford Road, Arundel



- 8.8. Overall, the proposals are for a landscape led scheme that will sit harmoniously in the landscape and provide 90 units of housing to a Local Authority that has a recognised deficiency in housing provision. The provision of affordable housing will assist in meeting a recognised need that is essential to ensure the long term health and viability of Arundel as a place to live and work. Accordingly Arun District Council are respectfully requested to support these proposals.

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