



PLANNING STATEMENT

Site of Greenhurst and Blastreat

14 Fitzalan Road

Arundel

Description of Development

Demolition of existing buildings and the erection of a block of 46 sheltered apartments for the elderly (comprising 22 x one bedroom apartments and 24 x two bedroom apartments age restricted to 60 years and over); with associated access electric buggy/cycle store and refuse bin store and 32 parking spaces and vehicle turning area.

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1. INTRODUCTION

- 1.1.1 This Planning Statement has been prepared on behalf of Renaissance Retirement Ltd. The proposal is for the demolition of the existing buildings and the erection of 46 sheltered apartments for the elderly (comprising 22 x one bedroom apartments and 24 x two bedroom sheltered apartments age restricted to 60 years and over); associated electric buggy/cycle store and refuse bin store; and the formation of 32 parking spaces and vehicle turning area, on the site of Greenhurst & Blastreat, 14 Fitzalan Road, Arundel.
- 1.1.2 This statement will explain the proposed development including the concept of the sheltered housing, the critical need for such accommodation on a national and local scale, outline the details of the application site and proposals and analyse the benefits of the scheme against the context of National and Local Planning Policy. The scheme will be assessed against material planning considerations which affect this site and the merits of the proposal for redevelopment.
- 1.1.3 This statement should be read in conjunction with the accompanying Design and Access Statement and Heritage Statement.
- 1.1.4 On 31 May 2017 Renaissance Retirement Ltd submitted an application on this site for the demolition of the existing buildings and the erection of 45 sheltered apartments for the elderly (comprising 21 x one bedroom apartments and 24 x two bedroom sheltered apartments age restricted to 60 years and over); associated electric buggy/cycle store and refuse bin store; and, the formation of 34 parking spaces and vehicle turning area (LPA Ref. AB/77/17/PL). That application was validated by the LPA on 7 August 2017.
- 1.1.5 At a meeting with the applicant held on 16 October 2017 the Planning Officer, whilst raising no objection to the principle of redevelopment of the site for sheltered housing for the elderly, raised concern over the design of the building on the north part of the site. The Planning Officer commented that in the light of Policy 5 of the Arundel Neighbourhood Development Plan (April 2014) that allocated the site for residential redevelopment, there was no objection to the demolition of the existing buildings. Whilst the proposed building on

the south west part of the site was considered to be acceptable, the Planning Officer suggested that it would be more appropriate for the design of the proposed building on the north east part of the site adjacent to the Arundel Conservation Area to reflect the utilitarian style and appearance of Victorian brewery architecture as this would provide a visual reference and association to the former Swallow Brewery that had once occupied the land between Queen Street and that part of Fitzalan Road.

1.1.6 At that meeting with the Planning Officer Renaissance Retirement Ltd presented a report received from BRE indicating that the submitted scheme required amendment to satisfy Daylight and Sunlight guidelines. The Planning Officer considered that the changes required to be made to the proposed building in that respect, together with the suggested revised design approach for the north east part of the development would warrant that current planning application being withdrawn and a new planning application to be submitted.

1.1.7 Accordingly, on 4 January 2018 the applicant withdrew planning application AB/77/17/PL.

1.1.8 This current revised planning application has been prepared having regard to those previous comments and in response to some of the concerns raised by third party representations. In summary, the current proposal includes the following revisions,

- The massing of that part of the building on the north east part of the site has been reduced opposite No.2 Fitzalan Road and at the northern corner of the site to satisfy daylight guidelines;
- The first and second floor glazed link between the north east and south west parts of the building has been deleted and replaced with a single storey link at ground floor level. The gap between the two blocks formed by the single storey link has been increased;
- This has resulted in the proposed vehicular entrance being relocated to the south west end of the site further from the bend in Fitzalan Road, thereby improving vehicular sight line visibility. Together with the stopping up of the existing vehicular entrances to Blastreat and Greenhurst this significantly improves existing highway safety along this part of Fitzalan Road;
- The revised layout enables the main pedestrian entrance into the building to be located fronting onto Fitzalan Road located midway between the proposed building on the north east and south west parts of the site. This main entrance into the building will be served by a new pavement to be constructed along the south west frontage of the site;
- The communal residents lounge is now located directly off of the main entrance into the building, providing a focal point and central area for social activities for the intended residents;

- The integral refuse bin store is now located in the south west part of the proposed building, further from the bend in Fitzalan Road and located so that it can be serviced directly from Fitzalan Road;
- The electric buggy store/cycle store is now positioned integral to the building and accessed off of the proposed access driveway. A second electric buggy store is also provided within the building adjacent to the rear main entrance into the building;
- The height of the north east block has been reduced from 4 storeys down to 3 storeys;
- The north east block has been designed to reflect a more utilitarian, modest style of architecture reflective of brewery architecture/design features found within Arundel;
- The length of the south west block has been reduced by a two window bay width;
- The main roof ridge line of the south west block has been lowered.



Current Proposal



Earlier Withdrawn Scheme

2 RENAISSANCE RETIREMENT LIVING

2.1.1 Renaissance Retirement Ltd was founded in 1997 with the aim of designing, building and managing sheltered housing developments that were better than the standard developments being produced across the country at the time. There are several examples of Renaissance Retirement developments which can be found at the following website:

<http://www.renaissancegroup.co.uk/new-homes>

2.1.2 Their sheltered housing developments are designed to provide secure, self-contained accommodation to meet the needs of independent older people. The developments are sold on a 125 year lease and managed by the Renaissance Retirement Management Company.

2.1.3 The sheltered apartments are designed to provide for the particular needs of their elderly occupiers.



2.1.4 The following communal services are provided to the occupiers of the proposed sheltered apartments within the development;

- **A Renaissance Retirement Concierge.** The Concierge will be responsible for the day-to-day running of the development. The Concierge will be employed on site daily between the hours of 9.00am to 5.00pm, Monday to Friday and will be present to check on the well-being of the elderly residents and to ensure that the building and the communal facilities are kept clean and maintained. The Concierge will be provided with a 7 seater people carrier vehicle to take residents on regular shopping trips and other outings.
- **Safety and Security.** In addition to the benefit of the security of the Concierge, the sheltered housing will have the following safety and security features:-
 - 24 hour alarm system;
 - CCTV door entry systems connected to owner's television sets;
 - Doors, door-sets, door furniture and windows in compliance with Part Q 'Security-Dwellings' of the Building Regulations and manufactured to a design that has been shown to meet the security requirements of British Standards publication PAS 24:2012;
 - 24 hour emergency call system fitted in all sheltered apartments, bathrooms and living areas plus wearable alarm button (optional);
 - Mains connected smoke detection system;
- **Communal Owners Lounge.** The owners lounge is provided with a small kitchenette where residents and their guests can prepare light refreshments and beverages. The Concierge will encourage residents to use the owners lounge for coffee mornings, social activities and other events;
- **Communal landscaped gardens.** The communal landscaped gardens form an attractive feature and setting for the proposed development. The gardens are designed by professional landscape architects and will provide attractive areas and patios for the residents to sit out in fine weather. The garden areas will be regularly maintained and managed by the Renaissance's landscape maintenance team.

3 THE NATIONAL NEED FOR OLDER PEOPLE'S HOUSING

- 3.1.1 The ageing population of the UK mirrors that in many other European countries. It is partly a consequence of the age structure of the population alive today, in particular the ageing of the large number of people born during the 1960s baby boom.
- 3.1.2 The latest 2011 Census statistics show that currently approximately 1 in 6 people in the population of England and Wales are over 65 years of age. There are now approximately half a million people over the age of 90.
- 3.1.3 What is important to note from the Census data is that the over 65 year old age group is by far the quickest growing age group. The detailed analysis of returns from the 2011 census show that the overall number of people turning 65 in 2012 increased by 30 per cent in a single year. Figures published by the Office for National Statistics reveal that there were 726,069 people aged 64 in England Wales in 2011 when the census was carried out.
- 3.1.4 This year a third of households will be headed by someone aged over 65 and 75% of older people will be owner-occupiers (2011 Census). Around 23% of the population are currently aged over 60, during the next 20 years this will increase to 29%. By 2039, 1 in 12 people will be aged 83 and over.
- 3.1.5 Specialist research by Knight Frank shows that around 25% of over 55's said they wanted to move into some form of retirement housing in the future This equates to 2.5 million households. They calculated that the average equity released by downsizing to a home with one less bedroom is around £52,000 nationally.
- 3.1.6 Currently less than 2% of housing stock is sheltered / retirement housing and 3% of new housing granted planning permission is specifically for the elderly. Taking into consideration levels of home ownership and desire to move Knight Frank assert that the retirement housing market could increase in size from the current figure of around 5,500 delivered per year to 20-30,000 homes per annum.¹

¹Knight Frank, Retirement Housing, 2016

- 3.1.7 More downsizing would not just help increase the delivery of new build housing but also help to free up larger family homes – with an estimated 10 million empty bedrooms currently predicted to be in the homes of older people by 2026.² These additional homes would help diversify the housing market and if those wanting to buy a retirement property were able to do so, it would release £307 million worth of housing back into the market³.
- 3.1.8 Freeing up under-occupied housing is one of a suite of benefits this form of housing has for residents, their families, local communities, the public sector and society in general, which are detailed more fully in *Chapter 5: Benefits of Older People's housing*.

² Hoarding of Housing, Intergenerational Foundation, 2011

³ Top of the Ladder, DEMOS, 2013

4 LOCAL NEED FOR OLDER PERSONS' HOUSING

4.1 Existing Specialist Older Persons' Housing Needs in the District

- 4.1.1 Arun District Council's "Updated Housing Needs Evidence" (September 2016) was prepared on its behalf by GL Hearn and forms part of the evidence base for the emerging Local Plan, it is referred to the "GL Hearn report" from this point onwards. The proportion of older people (defined as individuals aged 65 and above) in the District's population currently stands at 28.3% (43,996 individuals). This is significantly higher than the proportion of older people in England's population (17.7%).
- 4.1.2 We have provided a report of housing need for specialist accommodation for the elderly in Arun (Appendix A) using the Strategic Housing for Older People Analysis Tool (SHOP@) by the Housing Learning and Improvement Network's (Housing LIN). This is a well -respected tool that is widely used within both the private and public sector. The SHOP@ tool was used by GL Hearn in their Updated Housing Needs Evidence to assess the need for older persons' housing.
- 4.1.3 The Housing LIN provides a "Current Market Split" and "Future Market Split" with recommended tenure split settings for Authorities according to the following classifications; Most Deprived, Deprived, Affluent and Most Affluent. Whilst we appreciate that the District has a mix of deprived and affluent areas however we consider it reasonable to classify the Authority as affluent in a national context. The tenure recommendations detailed in the 'Affluent' setting (33% rented : 67% lease) are broadly in line with the recommended tenure split detailed by GL Hearn in the Updated Housing Need Evidence (60:40 split between the market and affordable sectors respectively (para. 5.13).
- 4.1.4 The 'Current Needs' section (page 2) of the SHOP@ report shows that the existing stock of specialist older persons' housing is currently 2,603 units, which broadly accords with the figure used in GL Hearn Report (2,607 units). This is equivalent to a provision of 128 units of specialist accommodation (other than registered care home places) per thousand people aged 75 and over, a shortfall against the Housing LIN'S recommendation of 170.
- 4.1.5 The SHOP@ report provided shows there is currently a slight 'mismatch' in the tenure of specialist older persons' accommodation. The existing tenure for older people (page 5) in

Arun is predominantly owner occupied however a significant proportion of specialist accommodation in the District is in the social rented sector. **The SHOP@ report advises that there is currently an oversupply of 77 sheltered housing units for rent, against an undersupply of 149 units for lease or sale in the Authority.**

- 4.1.6 The proposed development will go some way towards addressing the tenure mismatch in sheltered housing in the Authority.

4.2 Future Specialist Older Persons' Housing Needs in the District

- 4.2.1 The GL Hearn report uses the population projections from the Office of National Statistics to determine that the population aged 65 and over is expected to increase by 55% over the 20 years from 2011. This compares with an overall population growth of 20% and an increase in the under 65's population of 8%.
- 4.2.2 The District population aged 75 and over is projected to increase by 13,274 individuals to a total of 33,482 between 2011 and 2031. People within this age group are considered to be most likely to require specialist accommodation given the increased likelihood of frailty within this demographic. Using the Housing LINs recommendation of 170 units of specialist accommodation (other than registered care home places) per thousand people aged 75 and over, the GL Hearn report concludes that **there is a potential need for an additional 2, 257 units of specialist accommodation over the plan period - 113 per annum** (paragraph 5.9).
- 4.2.3 The analysis of the GL Hearn report does not make recommendations about the specific types of specialist housing that might be required. The 'Estimated Future Needs' section (page 3) of the SHOP@ provided (Appendix A) shows the supply of sheltered housing in the District would have to increase by an additional 485 unit by 2020 - from 2,603 units to 3,088 units. 2,069 units of these units would need to be for lease / sale an increase of 426 units from the existing level of sheltered / retirement housing stock (i.e. 1,643 units). **Arun District therefore requires an additional 426 units of sheltered housing for lease / sale by 2020.** The proposed development will go some way towards addressing that need.

4.3 Specialist Retirement Housing in Arundel

4.3.1 We have been made aware of comments over a perceived surplus of existing sheltered / retirement flats within Arundel itself. This is seemingly demonstrated by an alleged high volume of such properties for sale within Arundel.

4.3.2 The Elderly Accommodation Council (EAC) is a national Charity that aims to help older people make informed choices about meeting their housing and care needs. It provides a comprehensive directory of specialist housing developments for older people on a settlement by settlement basis. The EAC Accommodation Report for Arundel is provided in Appendix B but is summarised in the table below:

Address	Type of Accommodation	Completed	No. of Units
Batworth Park House, Crossbush, Arundel	Sheltered / Retirement Flats	1983	20
Caen Stone Court, Queen Street, Arundel	Sheltered / Retirement Flats	2009	24
Causeway Court, Queen Street, Arundel	Sheltered / Retirement Flats	1984	17
Martlets Court, Queen Street, Arundel	Sheltered / Retirement Flats	1990	50
Warwick Court, Torton Hill Road, Arundel	Sheltered / Retirement Flats	1982	28
Hurst Cottages, East Street, Amberley	Age Restricted Cottages	Unknown	4

4.3.3 The above table shows that there are currently a total of 5 sheltered / retirement developments comprising 139 units within Arundel (this excludes Hurst cottages as it provides a different form of accommodation, age restricted cottages, and is located within Amberley).

4.3.4 Of the 139 sheltered / retirement units existing in Arundel, 115 (83%) are more than 27 years old; the remaining 24 (17%) are approaching 8 years old. The age of sheltered / retirement housing is an important consideration for residents as modern efficient homes are better insulated and cheaper to heat and run. More modern sheltered / retirement properties benefit from the energy efficiency improvements delivered through the Building Regulations and the design improvements and innovation from within the sector to meet the increased expectations and lifestyle aspirations of prospective residents.

4.3.5 A recent search (28/03/2018) on Rightmove (Appendix C) demonstrates that there are currently only 10 units of retirement housing available for sale in the Arundel area at the time of writing. Of those, only 4 units are Category II sheltered housing for the elderly with communal facilities of which 2 of the units are in a development now more than 25 years old and the other two are in a development that is just under 10 years old. This is not considered to be a considerable level of available modern provision given the extent of need within Arun District detailed above.

4.4 Summary

- The proportion of individuals aged 65 and above in the District currently stands at 28.3% of the total population and is expected to increase by 55% over the 20 years from 2011;
- The population aged 75 and over (those most in need of specialist accommodation) is projected to increase by 13,274 individuals to a total of 33,482 between 2011 and 2031;
- the existing stock of specialist older persons' housing is currently 2,603 units;
- Current provision is 128 units of specialist accommodation per 1,000 people aged 75 and over, a shortfall against the Housing LIN'S recommendation of 170;
- The predominant tenure for older persons' in Arun is owner occupied however a significant proportion of specialist accommodation is social rented;
- There is an existing oversupply of 77 sheltered housing units for rent, against an undersupply of 149 units for lease or sale in the Authority;
- there is a potential need for an additional 2, 257 units of specialist accommodation over the plan period (113 per annum) based on the Housing LINs recommended standard;
- an additional 426 units of sheltered housing for lease / sale is required by 2020;
- there are currently a total of only 139 sheltered / retirement units existing in Arundel in 5 sheltered / retirement developments;
- 83% of all units are over 27 years old, and the remaining 17% are more than 8 years old; and,
- At the time of writing there were only 4 units of Category II sheltered housing available for sale to the elderly in Arundel.

5 BENEFITS OF OLDER PEOPLE'S HOUSING

5.1.1 The need to provide specialist housing for older people has been recognised specifically in Paragraph 21 of the National Planning Practice Guidance. The guidance recognises that housing for older people can help free up under-occupied housing and its provision is of critical importance given the projected increase in households over the age of 65.

5.1.2 Good quality retirement housing also has a range of significant benefits that can be divided into the three dimensions of sustainable development.

5.2 Economic

- When older people with low to moderate support needs move into specialist older persons' housing this generates a saving of £2,988 per person per year split evenly between savings from hospital stays (£1,449) and social care (£1,488). Updated for 18% CPI inflation between 2010 and 2017, this provides an annual saving of £3,525 a year per person.⁴
- In accordance with the Government's bedroom standard in which people have at least two unused bedrooms, 57% of people aged over 55 were considered to be under occupying. There were 18 million surplus bedrooms in 2009/2010, 9 million of which were under occupied by those aged 60 and over⁵. Shelter⁶ calculated that if 20% of older households currently under occupying were to downsize, around 840,000 family homes would be released, including 760,000 that were owner occupied in tenure.
- Older people are more inclined to shop locally and support the vitality and viability of local centres. A specialist retirement development of 55 residents spends approximately £610,000 in local shops per year, and when compared to a conventional housing development, some £2.3million in additional local spending over the development's lifetime⁷.

⁴ "Financial benefits of investment in specialist housing for vulnerable and older people" A report for the Homes & Communities Agency, Frontier Economics, 2010

⁵ 'Hoarding of Housing: The intergenerational crisis in the housing market', Intergenerational Foundation, 2011

⁶ 'A better fit? Creating Housing choices for an ageing population', Shelter, 2012.

⁷ A Better Life: Private Sheltered Housing and Independent Living for Older People, ORB, 2003

5.3 Social

- Sheltered housing helps to reduce anxieties and worries experienced by many elderly people living in housing which does not best suit their needs in retirement by providing safety, security and reducing management and maintenance concerns;
- This form of development provides companionship and a self-contained community which helps to reduce isolation, loneliness and depression. The impact of loneliness on one's health can be significant and is well documented, having a detrimental impact to an individual's mental health to an increased risk of falls and hospitalisation. Whilst no-one has quantified the country-wide cost of loneliness in later life, small scale schemes have delivered savings to the tune of £3 saved to the public purse for every £1 invested⁸;
- Provides a form of housing which addresses the on-set and increasing problems of mobility/frailty through maintaining health and general well-being;
- Residents of specialist housing for older people were found to have a reduced level of expected nights spent in hospital, providing a saving to the NHS of £2,598 per resident per annum⁹;
- Residents of specialist accommodation had a lower average number of visits per year to a GP of 4.2 compared to an average of 6 visits amongst the national population aged 75+¹⁰;
- Is very well located in relation to shops and other essential services, being within easy walking distance or readily accessible by public transport which can reduce isolation and reduce the worry of depending on a car and helps to maintain an independent lifestyle

5.4 Environmental

- Sheltered housing makes more efficient use of land thereby reducing the need to use limited land resources for housing;
- Providing medium to high density housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions;

⁸ *Building Companionship: How better design can combat loneliness in later life*, DEMOS & McCarthy & Stone, 2016

⁹ *Identifying the Health Gain Benefits from Retirement Housing*, Institute of Public Care, 2012

¹⁰ *A Better Life: Private Sheltered Housing and Independent Living for Older People*, ORB, 2003

- Providing medium to high density housing in a location highly accessible by public transport thereby enabling longer journeys to be undertaken by these modes thereby reducing the need to travel by car.

5.5 Summary

5.5.1 Research into the benefits of specialist housing has consistently found that it delivers significant savings to the public purse, particularly due to the reduced reliance on health and social care services. A recent report by the Strategic Society Centre entitled: *Valuing Retirement Housing* (2016) summarises how the development of one unit of retirement housing may make savings for the state in the table below:

Type of Savings	Estimated Value per person	Estimated Value per unit with 2 people
Health & Care Needs	£9,700	£19,400
Local Authority social care entitlement	£18,600	£37,200
First-time buyers and future retirement wealth	£54,800	£54,800
Total	£83,100	£111,400

5.5.2 At a time of Austerity in Government expenditure, those levels of financial savings are significant and underline the Government's reference to the delivery of older persons' accommodation being 'critical'.

6 THE SITE

- 6.1.1 The site is eminently suited for specialist retirement housing as it is located immediately adjacent to Arundel town centre and the associated shops, services and amenities located therein. Local facilities include a post office, hairdressers, pubs and restaurants and a number of small food stores including a Co-op within 50 metres fronting onto Queen Street.
- 6.1.2 The site is accessible via public transport, with the proposed development served by a number of bus routes from stops on Queen Street. These provide regular services to destinations within Arundel itself and other nearby settlements including Littlehampton, Worthing, Chichester and Bognor Regis. Arundel Rail Station is located 0.5 miles away from the site and provides access to the national rail network.
- 6.1.3 A detailed description of the site and its surroundings is provided in the accompanying Design & Access Statement. For the sake of brevity that description will not be repeated here.

7 RELEVANT PLANNING HISTORY

7.1.1 The site's planning history over the past five years is detailed below:

Application	Description	Decision	Decision Date
AB/120/89	Outline application for proposed development of 7. No. 3 bedroom, 3 storey town houses and 2 no. 3 / 4 bedroom, 3 storey town houses	Refused	28/03/1990
AB/142/07	Demolition of existing property Greenhurst & erection of 7 two bed dwellings with vehicular access, parking and landscaping	Withdrawn	24/10/2007
AB/72/09	Demolition of Greenhurst and erection of 7 no. 2 bedroom dwellings with vehicular access, parking and landscaping	Withdrawn	30/09/2009
AB/47/15/PL	Demolition of existing property and erection of 7 no. 2 bedroom dwellings with vehicular access, parking and landscaping	Withdrawn	19/06/2015
AB/167/15/PL	Demolition of existing property and erection of 7 no. 2 bedroom dwellings with vehicular access, parking and landscaping – Resubmission of AB/47/15/PL	Withdrawn	27/09/2016
AB/77/17/PL	Demolition of existing buildings and erection of a block of 45 sheltered apartments (comprising 21 x one bedroom & 24 x 2 bedroom units age restricted to 60 years and over) with associated access, electric buggy / cycle store, refuse bin store and 34 parking spaces	Withdrawn	04/01/2018

8 DESCRIPTION OF DEVELOPMENT

- 8.1.1 The proposal will comprise the demolition of the existing buildings and the erection of a block of 46 sheltered apartments for the elderly (comprising 22 x one bedroom apartments and 24 x two bedroom apartments age restricted to 60 years and over); with associated access electric buggy/cycle store and refuse bin store.
- 8.1.2 The accommodation will be served by 32 parking spaces within a parking court area with a new access onto Fitzalan Road.
- 8.1.3 The design concept together with an appraisal of the constraints and opportunities for the development of the site is set out in the accompanying Design Statement. For the sake of brevity that is not repeated here.

9 RELEVANT PLANNING POLICY

9.1 National Planning Policy Framework (NPPF) (Adopted March 2012)

9.1.1 The National Planning Policy Framework is a material consideration in planning decisions.

9.1.2 Paragraph 14 sets out that at the heart of the NPPF 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 making this means approving development proposals that accord with the development plan without delay (para 12).

9.1.3 The NPPF sets out clearly in paragraph 17 that LPAs should *"proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities."*

9.1.4 In respect of housing local planning authorities are required at paragraph 47 to;

"boost significantly the supply of housing..."

9.1.5 Paragraph 49 reiterates that;

"Housing applications should be considered in the context of the presumption in favour of sustainable development."

9.1.6 In addition, paragraph 50 requires a wide choice of high quality homes to be provided, to create sustainable, inclusive and mixed communities. LPAs should plan for this based on future demographic trends and the needs of different groups in the community (such as older people etc.) and identify the size, type, tenure and range of housing that is required in particular locations to reflect local demand.

9.1.7 The requirement for good design is a material planning consideration and one which is highlighted at Paragraph 58;

- *“Planning policies and decisions should aim to ensure that developments:*
- *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;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.”*

9.1.8 In addition, paragraph 61 states that whilst visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

9.1.9 It is highlighted that design policies should not be too prescriptive and that local design codes and design review arrangements are advantageous to ensuring delivery of innovative, inclusive, high quality design. Paragraph 65 directs that *“Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape...”*

9.1.10 The NPPF recognises the importance in the planning process of pre-application engagement and front loading in order to minimise the overall risk to developers for delays during the application period. This also includes local stakeholder engagement opportunities which are highlighted at Paragraph 189.

9.1.11 In determining planning applications, Paragraph 197 reiterates the presumption in favour of sustainable development applications, whilst Paragraph 204 highlights the importance of seeking Planning Obligations which meet all of the following tests;

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development."*

9.1.12 Paragraph 206 states that the prevailing market conditions should be taken into account to ensure that sufficient flexibility exists to ensure that development proposals do not become economically unviable due to onerous planning obligations. Equally, planning conditions should only be imposed in circumstances where they are necessary, relevant to planning and to the development approved, enforceable, precise and reasonable in all other respects.

9.1.13 In terms of Heritage Assets Paragraph 131 of the NPPF states that in determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, and
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality

9.1.14 Paragraph 137 of the NPPF states that Local Planning Authorities should look for opportunities for new developments within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to better reveal the significance of the asset should be treated favourably.

9.2 National Planning Policy Framework (NPPF) (Consultation 2018)

9.2.1 The Government published its draft revisions to the National Planning Policy Framework (NPPF) for consultation on the 6th March 2018. Whilst we recognise that no significant weight can be afforded to the proposed revisions at the time of writing nevertheless it does give an indication of the Government's general intent.

9.2.2 The NPPF requires Local Authorities to address the housing requirements of specific groups including *"those who require affordable housing, families with children, older people,*

*students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes". (Paragraph 62, **emphasis own**)*

- 9.2.3 There is also increasing emphasis on the allocation and delivery of small sites in paragraph 69. There is a proposed requirement for 20% of all housing allocations in Development Plans to be under 0.5 hectares and for planning officers to "support the development of windfall sites through their policies and decisions – giving **great weight** to the benefits of using suitable sites within existing settlements for homes". (Paragraph 69, **emphasis own**).
- 9.2.4 The effective and efficient development of previously developed land for homes is afforded "*substantial weight*" in Paragraphs 118 – 120 of the revised NPPF. It also promotes and "*supports opportunities to use airspace above existing residential and commercial premises for new homes*".
- 9.2.5 The encouragement to build at higher densities is reiterated in Paragraph 123 stating that "*local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site*".
- 9.2.6 As the proposal redevelops a small, previously developed site for higher density specialist older persons' housing, it is very much aligned with the revisions to national planning policy in the emerging NPPF.

9.3 National Planning Policy Guidance

- 9.3.1 The National Planning Policy Guidance, which was published on 6th March 2014, includes the following section on housing for older people at paragraph 21:
- "The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). The age profile of the population can be drawn from Census data. Projection of population and households by age group should also be used. Plan makers will need to consider the size,*

location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied.”

9.4 Housing White Paper: Fixing Our Broken Housing Market (2017)

- 9.4.1 The Department of Communities and Local Government (DCLG) recently published a housing White Paper entitled: Fixing our Broken Housing Market (February 2017). In this document the Government acknowledges the benefits of specialist retirement housing stating that ‘Helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more family homes for other buyers’ (para 4.42).
- 9.4.2 The White Paper also advises that the Government will be introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. This will produce clear expectations about planning to meet the needs of older people, including supporting the development of such homes near local services.
- 9.4.3 Whilst it is appreciated that this guidance is still pending publication, the importance the Government is placing on meeting the housing needs of older people is clear.

9.5 Communities and Local Government Committee Report: Housing for older people (9th February 2018)

- 9.5.1 The Communities and Local Government Committee (CLGC), appointed by the House of Commons published their report “Housing for older people” (February 2018). The decision to examine the issue of housing for older people was a consequence of the Committee’s enquiries on adult social care and capacity in the building industry. The evidence emphasised that we have both an ageing population, with associated health and care needs, and a general shortage of homes.

9.5.2 The key findings and recommendations of the CLCG can be summarised as:

- Accessible and specialist homes are a key to housing an ageing population. Specialist housing can promote the health and well-being of older people leading to savings in spending on health and social care;
- There is a well-evidenced link between housing, health and wellbeing. Poor quality, unadapted, hazardous, poorly heated and insulated accommodation can lead to reduced mobility, depression, chronic and acute illness and falls;
- Social isolation can lead to poor mental and physical health. Ensuring that older people's housing is within easy reach of local services, amenities and public transport links is therefore critical;
- Older people who wish to move should be able to choose from a wide range of housing to accommodate their needs and preferences;
- There is an overall shortfall in the number of specialist homes but particularly for private ownership and the 'middle market'. Limiting the housing options available to older people reduces the opportunities to derive the health and wellbeing benefits linked to these forms of accommodation;
- There is a need for a national strategy which brings together and improves the policy on housing for older people;
- National and local planning policy should give greater encouragement to the development of housing for older people;
- The forthcoming guidance under the Neighbourhood Planning Act 2017 should recommend that:
 - Local authorities produce an evidenced strategy detailing how they intend to meet the housing needs of older people in their area. This should include an analysis of the scale, mix and tenures needed
 - Local authorities should be more receptive to private developers who wish to build housing for older people and appreciate the potential health and wellbeing benefits derived from these forms of housing.
- Planning contributions for specialist housing such as Affordable Housing and CIL are disproportionate and this is impeding their delivery. The CLGC recommends either the creation of a sub-category of the C2 planning classification for specialist housing, (which only covers care homes and some forms of extra care housing at present) or, the creation of a bespoke use class for specialist housing. This would reduce the extent of planning contributions required from developers.

9.5.3 In conclusion, CLGC comment that whilst our ageing society something to be celebrated, it also presents challenges as people's housing needs and preferences change as they grow older and they may want to make changes to the way they live.

10 RELEVANT LOCAL PLANNING POLICY

10.1 Arun Local Plan 2003 -2011

10.1.1 The development plan for Arun currently comprises the ‘saved’ policies of the adopted 2003 Arun Local Plan. Those ‘saved’ policies relevant to the proposed development include the following:

- Policy GEN 2 Built up Area Boundary
- Policy GEN 7 The Form of New Development
- Policy GEN 11 Inland Flooding
- Policy GEN 12 Parking in New Development
- Policy GEN 18 Crime Prevention
- Policy GEN 22 Buildings or Structures of Character
- Policy AREA 2 Conservation Areas
- Policy DEV 17 Affordable Housing
- Policy DEV 21 Accommodation Restricted to Occupancy by the Elderly
- Policy DEV 22 Relaxation of Restrictions Relating to Occupation by the Elderly

10.2 Arun Local Plan 2011 - 2031 (October 2014)

10.2.1 The emerging Local Plan for the Authority which, at the time of writing the Council had published modifications for public consultation. Whilst these policies are still pending formal adoption, given the Local Plan’s advanced stage of preparation they are deemed to be a material consideration in the determination of this application. The relevant emerging policies include the following:

- Policy SD SP1 Sustainable Development
- Policy SD SP2 Built-up Area Boundary
- Policy H SP1 Strategic Housing, Parish and Town Council Allocations
- Policy H SP2 Affordable Housing
- Policy H DM2 Independent Living and Care Homes
- Policy D SP1 Design
- Policy D DM1 Aspects of form & Design Quality
- Policy D DM2 Internal Space Standards
- Policy D DM3 External Space Standards
- Policy ECC SP1 Adapting to Climate Change
- Policy ECC SP2 Energy and Climate Change Mitigation
- Policy T SP1 Transport and Development

- Policy HER SP1 The Historic Environment
- Policy HER DM2 Locally Listed Buildings or Structures of Character
- Policy HER DM3 Conservation Areas
- Policy W DM2 Flood Risk
- Policy W DM3 Sustainable Urban Drainage Systems
- Policy QE SP1 Quality of the Environment

10.2.2 The application site is previously developed 'brownfield' land within the built-up area. On the Proposals Maps to the proposed modifications to the Arun Local Plan updated 2017 the site is shown allocated as a housing site.

10.3 The Arundel Neighbourhood Development Plan (April 2014)

10.3.1 Following the Localism Act of 2011, Arundel Town Council have prepared the Arundel Neighbourhood Development Plan which was adopted by the District Council on 30 April 2014 and now forms part of the Development Plan.

- Policy 1: Presumption in Favour of Sustainable Development
- Policy 2: A Spatial Plan for the Parish
- Policy 3: Housing Supply
- Policy 5: Land at Fitzalan Road
- Policy 6: Transport Access and Car Parking

10.3.2 The site is identified as being a suitable location for housing in Policy 5. Further consideration on the wording of this policy and in particular the alleged limit to development on this site is addressed in *Chapter 11: Quantum of Development*.

10.4 Supplementary Planning Guidance

10.4.1 Due consideration has been given to any Supplementary Planning Guidance that forms part of the Arun Local Development Framework including:

- Open Space & Recreation Standards SPG (October 2000)
- Conservation Areas SPG (October 2000)
- Parking Standards SPG (October 2000)

11 QUANTUM OF DEVELOPMENT

11.1 Policy Context

11.1.1 The site sits within the settlement envelope of Arundel and is unallocated in both the adopted the emerging District Local Plan. The site was however allocated for housing in the Arundel Neighbourhood Development Plan, specifically in *Policy 5: Land at Fitzalan Road*.

11.1.2 The wording of Policy 5 advises that:

'The Neighbourhood Plan will support proposals for housing development of approximately 24 dwellings at Fitzalan Road, comprising a mix of dwelling types, as shown on the Proposals Map' (emphasis own)

11.1.3 During pre-application discussion meetings with representatives of the Arundel Town Council, it was asserted that 24 dwellings served as an upper limit for the quantum of development on this site and that development exceeding this number of units would be contrary to the Neighbourhood Plan. This position has been repeated regularly by representatives of the Arundel Town Council in the Local Press.

11.1.4 It is the view of the applicant that asserting that 24 dwellings serves as a 'cap' or upper limit' is disingenuous. This matter was specifically addressed during the Examination of the Neighbourhood Plan.

11.1.5 Policy 3 of the Neighbourhood Plan was modified by Examiner Christopher Collison, on his recommendation dated 10th February 2014 so that the Plan provides for the development of a minimum of 60 homes for completion in the period from 1 April 2014 to 31 December 2029 and not 'up to 90 homes' as was proposed by the Town Council originally. The Examiner's rationale for this was as follows:

At the heart of the Framework is a presumption in favour of sustainable development. All plans should be based upon and reflect this presumption. Neighbourhood plans should plan positively to support local development. The use of the term 'up to 90 homes', although described as a target, has the effect of establishing a maximum number. Strict adherence to

a specified number creating a ceiling or cap on development represents an inappropriate constrained approach to sustainable development that may potentially be proposed during the plan period. (Page 20, Paragraph 4) (**Emphasis** Own)

- 11.1.6 Similarly, to ensure that the adopted Neighbourhood Plan accords with NPPF in promoting the delivery of more sustainable housing development the Examiner required Policy 5 relating to the land at Fitzalan Road (the subject of this application) to be modified to remove the limit on the number of dwellings proposed to be developed on this site. A modification was required to replace the Council's original wording of 'up to 24 dwellings' with 'approximately 24 dwellings'. The Examiner advised the following:

In considering policy 3 I have concluded the use of the term "up to" by imposing a ceiling or cap on total development does not have regard to national policy in which there is a presumption in favour of sustainable development. It is however understandable that those people preparing a neighbourhood plan will seek to estimate individual site capacities in order to appreciate whether or not provision will meet local need. Actual numbers of homes achieved on sites will be determined on a site by site basis when detailed schemes are prepared and assessed taking into consideration site constraints.

*In order to have regard to national policy as set out in the Framework indicative capacities, instead of a cap, should be stated in respect of the River Road, Ford Road and Fitzalan Road sites... (Page 21, Paragraph 4 & 5) (**Emphasis** own)*

- 11.1.7 It was therefore made explicitly clear during the Examination of the Neighbourhood Plan that the imposition of an upper limit on development was contrary to National Planning Policy Guidance. Similarly **the quantum of development stipulated in Policy 5 was only ever intended to be indicative** and **the exact number of units could only be determined through the preparation and assessment of a detailed scheme.**

- 11.1.8 The Examiner's Report also emphasises the importance of monitoring and review of the Neighbourhood Plan:

"...The Neighbourhood Plan contains a commitment to ongoing annual monitoring and a proposal that the Town Council will formally review the plan on a five year cycle, or to

coincide with the review of the Arun Local Plan if this cycle is different. This approach represents good practice and will ensure that the Neighbourhood Plan remains up to date, relevant, and effective in encouraging and shaping appropriate development. The reference in paragraph 3.7 of the Submission Plan should however be to the two emerging Local Plans that will apply in the area. I have not however made a recommendation for modification of the Neighbourhood Plan in this respect as it is not necessary to meet the basic conditions” (underlining – my emphasis)

- 11.1.9 There has been a significant increase in the level of Objectively Assessed Need (OAN) for housing in the District and accordingly Town and Parish Councils have been asked to review their Neighbourhood Plans to accommodate the increased requirement.

11.2 5 Year Housing Supply

- 11.2.1 In the absence of a 5-year supply of housing land, paragraph 14 of the NPPF indicates that planning permission should be granted unless (a) any adverse impacts of doing so significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework as a whole or (b) specific policies in the Framework indicate development should be restricted.
- 11.2.2 In a recent decision by the Secretary of State (SoS) dated 12 February 2018 in respect of an appeal by Church Commissioners for England against Arun District Council’s decision to refuse Outline planning permission for development of up to 50 residential units on land west of New Barn Lane, Bersted, West Sussex, PO21 5DN (LPA Ref. BE/77/16/OUT – PINS Ref. APP/C3810/V/17/3166900) the SoS accepted Inspector Kenneth Stone’s findings that Arun District Council are only able to demonstrate a 2.07 years Housing Land Supply (HLS).
- 11.2.3 As a consequence the SoS accepts the Inspectors findings that,
- First, policies for the supply of housing in the Development Plan and in the Bersted Neighbourhood Plan 2014-29 must be regarded as being out of date, since the Council cannot demonstrate a 5 year HLS (The policies of the Neighbourhood Plan are not engaged as the Council is unable to demonstrate a 3 year supply of housing land). Therefore, such policies are out of date and can be given limited weight;
 - Second, policies which are not ‘housing supply policies’ but are instead ‘counterpart policies’ which engage to restrict the supply of housing, must also be considered ‘out

of date' since they are predicated on housing need figures that have been rendered wholly obsolete.

- Thirdly, because relevant policies are out of date, then the 'tilted balance' in paragraph 14 of the NPPF is engaged;
- Fourthly, the weight attaching to all these policies – both policies for the supply of housing, and also counterpart policies which engage to restrict HLS – must be very considerably reduced. Where the weight attaching to those policies is reduced, it follows that the weight attaching to conflict with those policies must be reduced also.

11.2.4 In the light of the above the SoS accepted the Inspector's conclusion that the tilted balance in the Framework is engaged; as such planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

11.2.5 These same principles apply in the case of the current proposed development.

11.2.6 In the light of the dire housing position of the District, the Council is looking into ways to increase the housing land supply in the short term, pertinently by encouraging smaller sites which can be delivered quickly to boost the 5 year housing land supply.

11.2.7 Renaissance considers that the proposed development site can accommodate a higher quantum of development than the indicative number stated in the Arundel Neighbourhood Plan. This makes the best use of a sustainably located brownfield site within the existing settlement boundary and helps to boost short term housing numbers and delivery in the District.

11.3 Status of the Neighbourhood Plan

11.3.1 The Arundel Neighbourhood Development Plan must also be considered in the context of the [Written Ministerial Statement of the 13th December 2016](#) (Ref: HCWS346). This Statement specifically addresses housing policies in Neighbourhood Plans and advises that:

"...relevant policies for the supply of housing in a neighbourhood plan, that is part of the development plan, should not be deemed to be 'out-of-date' under paragraph 49 of the National Planning Policy Framework where all of the following circumstances arise at the time the decision is made:

- *This written ministerial statement is less than 2 years old, or the neighbourhood plan has been part of the development plan for 2 years or less;*
- *the neighbourhood plan allocates sites for housing; and*
- *the local planning authority can demonstrate a three-year supply of deliverable housing sites.*

This statement applies to decisions made on planning applications and appeals from today”.

11.3.2 Whilst the Neighbourhood Plan does allocate sites for housing, it is over 2 years old and the Council can only presently demonstrate 2.07 years of housing land supply. Neighbourhood Plan policies relating to the supply of housing, including Policy 5, must therefore be considered out of date in accordance with the aforementioned Written Ministerial Statement and can be attributed little weight in the determination of this application. This position was confirmed by District Planning Officers in written Pre-Application advice (Ref: PAA/224/16).

11.4 Summary

11.4.1 The proposed development site was identified for housing in *Policy 5: Land at Fitzalan Road* through the Arundel Neighbourhood Plan. Representatives of the Town Council have strongly asserted that the number of units in the proposal is contrary to this Policy. However:

- The wording of Policy 5 in the Neighbourhood Plan set an indicative target of 24 dwellings, not a limit;
- The Examiner’s Report made it clear that the imposition of a ceiling or cap would be contrary to the presumption in favour of sustainable development, and that the exact number of units could only be determined via the preparation of a detailed scheme;
- Arun District Council has a ‘policy off’ 5 year housing land supply position of 2.07 years;
- The Arundel Neighbourhood Plan meets the criteria in Written Ministerial Statement (HCWS346) that deem policies relating to housing supply to be considered out of date. Policy 5 can only be attributed little weight in the determination of the application;

- The District Council has requested Town and Parish Council's to review their Neighbourhood Plans to accommodate the District's increased housing requirement;
- The District Council is actively seeking to increase the delivery of smaller sites in the District to meet the shortfall in housing land supply.

11.4.2 The proposal makes best use of a previously developed site in a sustainable location, delivering a much needed form of residential accommodation in the District. Optimising the use of this site will boost the delivery of housing at a time when the District Council is seeking to boost the delivery of small sites to address the dire shortfall in housing land supply.

11.4.3 Similarly, the District Council has requested that the Arundel Neighbourhood Plan is reviewed to accommodate an increased housing requirement. Again, making best use of the site will also assist in this respect.

11.4.4 Finally, we reiterate that the indicative number of dwellings (24) detailed in Policy 5 in the Neighbourhood Plan **did not** serve as a 'cap' or upper limit. This matter was specifically addressed during the Examination of the Neighbourhood Plan.