



SEQUENTIAL FLOOD RISK ASSESSMENT

**Land at Greenhurst & 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.

March 2018

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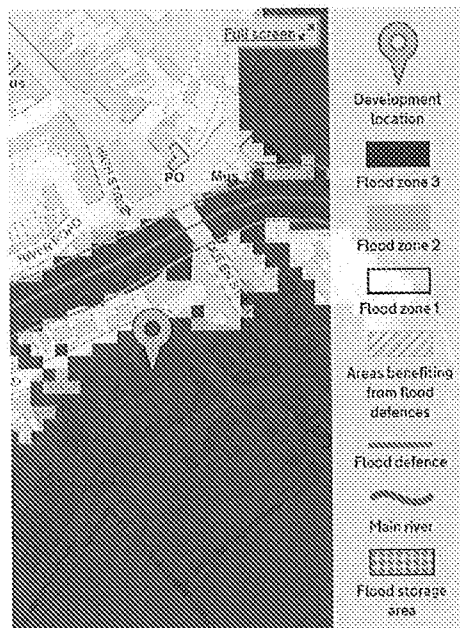
1 INTRODUCTION

1.1.1 This sequential test has been produced in support of the proposed development involving the demolition of existing buildings and the erection of 46 sheltered apartments (22 x one bedroom and 24 x two bedroom units) on the site of Greenhurst and Blastreat, Fitzalan Road, Arundel.

1.1.2 In carrying out this sequential test regard has been given to the NPPF flood risk Practice Guidance and the guidance provided by the Environment Agency in their document '*Demonstrating the flood risk Sequential Test for Planning Applications*'. The principle purpose of this sequential test is to consider the availability of alternative sites for the development as part of the examination of flood risk.

1.2 What is the flood risk

1.2.1 The site is identified as being within Flood Zone 3 of the Strategic Flood Risk Assessment (SFRA) undertaken by Arundel Council when allowance for climate change is included (Appendix F).



Excerpt from the Environment Agency's Flood Risk Map for Planning

- 1.2.2 In terms of the flood risk vulnerability classification set out in Table 2 to the 'Technical Guidance to the National Planning policy Framework' (March 2012) buildings used as dwelling houses are categorised as being 'more vulnerable' and therefore are subject to the Flood Risk Sequential Test and Exceptions Test as set out in Table 3 to the NPPF Technical Guidance.
- 1.2.3 Renaissance Retirement Ltd has commissioned the consulting engineers Arch Associates to review the Arundel SFRA and the implications for the proposed development on the application site.

2 LEVEL OF FLOOD RISK

- 2.1.1 The site is identified as sitting within the outer edges of Flood Zone 3 in the Arun Strategic Flood Risk Assessment (SFRA). In terms of 'flood risk vulnerability classification' set out in Table 2 to the Technical Guidance to the National Planning Policy Framework (2012), buildings used as dwelling houses are categorised as being 'more vulnerable' and therefore are subject to the Sequential Test and Exceptions test as set out in Table 3 to the NPPF technical guidance.
- 2.1.2 Renaissance Retirement commissioned consulting engineers Arch Associates to review the Arun SFRA and the implications for the proposed development site.
- 2.1.3 Tidal Flooding is the principle source of flooding at this site due to the tidal effects on the River Arun, which is only a short distance from the site. The site is located within Flood Zone 3 but existing defences reduce the predicted 1 in 200 year event + climate change level to 2.55m AOD (maximum), which is below the majority of the existing site topography. In particular, the area to the Northeast of the site remains dry during this event.
- 2.1.4 Fluvial Flooding from the River Arun if undefended places the site in Flood Zone 3. However, the site is defended against Fluvial flooding for the 1 in 100 year event plus climate change. The site is effectively in Flood Zone 1 when the defences are in effect.
- 2.1.5 The undefended tidal 1 in 200 year + climate change flood plus the undefended 1 in 100 year fluvial flood + climate change will lead to flooding on site. Existing defences greatly reduce this and large areas of the site will remain dry while defences are in place.
- 2.1.6 It is necessary to lift all habitable 'more vulnerable' dwellings out of the predicted flood zone with a freeboard allowance. The proposed ground floor level of the development will therefore need to be set at a minimum of 3.88m AOD. This level has been advised by the Environment Agency and equates to the 1 in 200 year Tidal Flood Level (undefended) of 3.58m + 300mm freeboard. The current Architect's proposals show a finished flood level of 3.9m AOD, which is therefore acceptable.

- 2.1.7 A proposed FFL of 3.9m AOD will keep the habitable areas out of the Fluvial undefended flood event at 3.33m AOD. Safe access from the site during the 1 in 200 year defended tidal event is found to the East of the site from where occupants have a safe route towards Queen Street Bridge.
- 2.1.8 Maintenance and improvement works to the flood defences will keep the proposed building defended for at least the lifetime of the development.

3 THE SITE AND THE PROPOSED DEVELOPMENT

- 3.1.1 The site is located on the Fitzalan Road and comprises the industrial premises of Blastreat, an industrial and architectural blast cleaning and finishing company, and the neighbouring residential property 'Greenhurst'.
- 3.1.2 The total site area is 3660m². The site of Balstreat at no. 14 Fitzalan Road predominantly comprises of hardstanding and workshop structures associated with the industrial process.
- 3.1.3 The site is located immediately adjacent to Arundel town centre and the associated shops, services and amenities located therein. The site is accessible to public transport, with the proposed development served by a number of bus routes from stops on Queen Street. Arundel railway station is within 700 metres to the south east. The site is considered to be eminently suitable for specialist retirement housing as a consequence.
- 3.1.4 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.

4 SEQUENTIAL TEST APPROACH

- 4.1.1 On 09/05/2017 Renaissance Retirement Ltd. wrote to the Local Planning Authority to agree the scope of the flood risk sequential test in respect of the proposed development of this site.
- 4.1.2 The LPA responded by email on 08/06/2017 (Appendix A) and agreed that the scope of the sequential test should include the following:

4.2 Locational criteria

- 4.2.1 We propose the following locational criteria for the proposed development:
- The site must be in a sustainable location within the built up area of Aundel, as it is intended to meet the needs of older persons' within this settlement;
 - The site is in close proximity (800metres or 0.5 miles) from a good range of shops, services and public transport to best promote the continued independence of the intended residents.
 - The route to the town centre and amenities must be level without any significant changes in gradient.
- 4.2.2 In relation to the second point we brought to the Council's attention a recent appeal decision (PINS Ref: APP/Q3305/W/16/3143325) in which the local planning authority (Mendip District Council) contested the rationale for a specialist retirement housing developer (Churchill Retirement Living) for limiting the search for suitable alternative sites to within a 0.5miles radius of Wells city centre. The appeal decision is provided in Appendix B:
- 4.2.3 The Appeal Inspector concluded the following:
- '... there is clearly some sense in what leads to the appellant's definition of the catchment area. Half a mile is a reasonable walking distance to shops, services and facilities for the elderly who may be active but no longer have a car of their own – it means they can retain a certain independence and that they would not, without the assistance of friends or relatives, be effectively confined to where they lived.'* (Paragraph 25.)

- 4.2.4 In light of the above we consider that the search for suitable alternative available sites for the Sequential Test should be limited to a 0.5 miles radius from Arundel town centre (Appendix E).

4.3 Site and Surroundings

- 4.3.1 When comparing reasonably available sites identified under Stage 2 with the application site, the Environment Agency advises that:

"...Sites should be compared in relation to flood risk; Local Plan status; capacity; and constraints to delivery including availability, policy restrictions, physical problems or limitations, potential impacts of development, and future environmental conditions that would be experienced by the inhabitants of the development."

- 4.3.2 Furthermore, National Planning Practice Guidance entitled "Applying the Sequential Test to individual planning applications" advises:

"For individual planning applications where there has been no sequential testing of the allocations in the development plan, or where the use of the site being proposed is not in accordance with the development plan, the area to apply the Sequential Test across will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases it may be identified from other Local Plan policies, such as the need for affordable housing within a town centre, or a specific area identified for regeneration. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives".

(Paragraph: 034 Reference ID: 7-034-20140306)

- 4.3.3 The proposed development is for specialist retirement housing for which the NPPG advises there is a critical need. Suitable development sites for this form of development need to have certain characteristics to adequately meet the requirements of their intended residents.

4.3.4 We propose the alternative sites and their surroundings should demonstrate the following characteristics:-

- The site should be “brownfield” previously developed land.
- The site’s topography must be predominantly level with no significant changes in gradients to allow suitable flat, level access across the site;
- The site must be a minimum of 0.3 hectares in size to accommodate a ‘the economies of scale’ to support the additional cost of enhanced communal facilities and staffing that characterise this form of development.
- The site should be situated within an area where residential use would be acceptable with the surrounding uses
- The site should offer the opportunity for the elderly residents to integrate into and become part of the local community.
- The site should be unconstrained and available for development.

4.4 Evidence Base

4.4.1 The principle evidence sources for the Sequential Test will be:

- i. Arun District Council Housing and Economic Land Availability Assessment (HELAA) (See Appendix C)
- ii. The Arun Local Plan Publication Version (2014)
- iii. Arun District Council Strategic Flood Risk Assessment (2016)
- iv. Arun Local Plan (2011 – 2031) Sequential Exception Test (2014)
- v. Arundel Neighbourhood Plan (2014)
- vi. Rightmove Search for Land & Commercial Property in Arundel (See Appendix D)

5 ASSESSMENT OF ALTERNATIVE AVAILABLE SITES

5.1.1 The Table 1. below contains a list of potentially developable sites identified by the evidence sources detailed in paragraph 4.4.1 of this report.

5.1.2 This table assesses each site against the locational and site / surroundings criteria identified in Paragraph 4.2.1 of this report and discounts sites that do not meet these initial requirements. These are:

- Within 0.5 miles of Arundel Town Centre (See Appendix E)
- Located outside of Flood Zone 3 (See Appendix F)
- Over 0.3 ha in size

5.1.3 Further to this initial overarching assessment the five sites listed below and mapped in Appendix G were identified as meeting all of the above criteria and were subjected to further assessment to determine if they were a sequentially preferable location for development. The individual assessment of these sites is provided in Chapter 6.

- Site A) Electric Sub-station, Ford Road
- Site B) Land at Cemetary, London Road
- Site C) Land South West of the A27, North of Canada Road
- Site D) Former Castle Stables
- Site E) Norfolk Arms Hotel, 22 High Street

Site name / address	Evidence Base	Ref No.	Flood Zone	Within 0.5 miles of TC	Site size (ha)	Further Assessment
Mill House Farm	HELAA	56	3	Yes	10.12	NO
Land off Fitzalan Road	HELAA	57	3	Yes	1.6	NO
Electric Sub Station (Land North East of)	HELAA	58	3	Yes	0.6	NO
Horse Field, Torton Hill Road	HELAA	59	1	No	2.15	NO
Land adjacent to Arundel Park Inn, the Causeway	HELAA	60	3	No	0.3	NO
Tower House Allotments, Maltravers Street	HELAA	61	1	Yes	0.17	NO
Allotment Site Fitzalan Road	HELAA	64	3	Yes	0.74	NO
Garage Site, Ford Road	HELAA	65	3	Yes	0.15	NO
Land South of Stewards Rise	HELAA	66	Part 3 / 2 & 1	No	11.12	NO
Electric Sub Station, Ford Road	HELAA	115	Part 3 / 2 & 1	Yes	0.43	YES
Land at Cemetery, London Road	HELAA	AB3	1	Yes	0.34	YES
Land South West of St Philip Catholic Primary School	HELAA	AB4	1	Yes	0.25	NO
Warehouse / Barn (Bevin Bevin & Co. Ltd.) at River Road	HELAA	AB6	1	Yes	0.25	NO
Telephone Exchange Fitzalan Road	HELAA	AB9	3	Yes	0.22	NO
Electric Sub Station (Land South of), Ford Road	HELAA	AB11	3	Yes	1.06	NO
Land South of A27, North of Canada Road	HELAA	AB12	1	Partially	0.94ha	YES
Fitzalan Road West	HELAA	RU6	Part 1 / 2 / 3	Yes	0.17	NO
Former Castle Stables	Neighbourhood Plan	Policy 4	1	Yes	unknown	YES
Norfolk Arms Hotel, 22 High Street	Rightmove	n/a	1	Yes	Unknown	YES

6 ASSESSMENT OF INDIVIDUAL SITES

6.1 Site A) The Electric Substation Site, Ford Road

6.1.1 This site is identified in the HELAA (site ref 115) as a 'developable site'. The site is an overgrown plot with a former electrical substation. It is located on the approach into Arundel off Ford Road.

6.1.2 The majority of the site sits within Flood Zone 3 (circa 70%), a small amount sits within Flood Zone 2 and circa 30% of the site sits within Flood Zone 1. The proportion of the site within Flood Zone 1 is not considered to be sufficient in size (under 0.13ha) to accommodate a viable number of specialist sheltered dwelling retirement units. The Council's summary of HELAA Assessment of the site advises that the site would be required to pass the exceptions test.

6.1.3 The site is accordingly discounted as a suitable location for specialist retirement housing.

6.2 Site B) Land at Cemetery, London Road

6.2.1 This site is identified in the HELAA (Site Ref: AB3) as a 'developable' site. The site is a wooded / vegetated area that is located to the rear of a cemetery and bounds the Arundel bypass (A284).

6.2.2 There are extremely steep gradients on the site itself and the HELAA advises that there are issues with earth stability. The site is also isolated from other residential areas and vehicular access is an issue. Again, whilst the site is located within 0.4 miles of the town centre the gradients both within the site and en-route to the town centre are considered unsuitable for the intended elderly residents.

6.2.3 The site is accordingly discounted as a suitable location for specialist retirement housing.

6.3 Site C) Land South of A27, North of Canada Road

- 6.3.1 This site is identified in the HELAA (site ref: AB12) as 'not currently developable'. The site is a wooded / vegetated area located to the rear of residential properties on Canada Road and bounded by Chichester Road (A27) to the north.
- 6.3.2 The eastern extent of the site sits within 0.5 miles of Arundel town centre however this part of the site is irregular in shape, narrow and has a significant number of trees that screen the A27. These factors would significantly reduce the developable area of the site
- 6.3.3 As with the Electric Substation site on Ford Road, the pedestrian route to Arundel town centre is considered unsuitable for the intended residents. Residents walking or using mobility scooters would have to cross the busy roundabout that serves the Arundel bypass.
- 6.3.4 The site is accordingly discounted as a suitable location for specialist retirement housing.

6.4 Site D) Former Castle Stables

- 6.4.1 This site is identified as a potential development site in the Arundel Neighbourhood Local Plan, specifically *Policy 4: Housing Site Allocations*. The site sits within the grounds of Arundel Castle, a Grade II Listed building and the South Downs National Park. Additionally there is a Grade II Listed building within the stables complex itself.
- 6.4.2 Policy 4 accordingly advises that:

Given the National Park and heritage asset sensitivities of the Former Castle Stables, proposals must include a historic buildings analysis to support the proposed number of dwellings; demonstration that commercial uses for the stables are no longer viable; and a sequential assessment demonstrating new build elements cannot be achieved in a more appropriate location.

6.4.3 At the time of writing it is unknown whether it has been established that a commercial use for the stables is no longer viable. Many of the buildings on site would require significant reconfiguration and modernisation, if not complete demolition and redevelopment to be appropriately converted in to specialist sheltered housing for the elderly. This would be challenging, if not unacceptable, in planning and heritage terms.

6.4.4 The location of the site is also not considered to be ideal with the gradients en-route to the town centre considered unsuitable for the intended elderly residents.

6.4.5 The site is accordingly discounted as a suitable location for specialist retirement housing.

6.5 Site E) Norfolk Arms Hotel, High Street

6.5.1 The site was not identified in the HELAA as a potential development site its inclusion is the result of a Rightmove search for Commercial properties in Arundel.

6.5.2 It is worth noting that the site is being marketed as a well-established and currently trading hotel and restaurant concern. There is nothing in the brochure to suggest that the vendor would consider selling for the purposes of redevelopment. Indeed given the heritage and prominent position on High Street, it is unlikely that residential redevelopment of this property would be acceptable to the vendor, Local Planning Authority or the local community.

6.5.3 Furthermore, the Norfolk Arms Hotel is a Grade II* Listed building (List UID: 1027908) and is immediately abutted and adjacent to other statutorily Listed Buildings. Whilst the building appears spacious, it would require significant modernisation and internal reconfiguration to be appropriately converted in to specialist sheltered housing for the elderly. Indeed, it is likely that the site would need to be demolished and redeveloped in its entirety. This would be unacceptable in planning and heritage terms.

6.5.4 The site is accordingly discounted as a suitable location for specialist retirement housing.

7 CONCLUSIONS OF THE SEQUENTIAL TEST

- 7.1.1 Paragraph 033 (Ref. ID: 7-033-20140306) of the NPPF Planning Practice Guidance advocates that when applying the Sequential Test to individual planning applications, a pragmatic approach on the availability of alternatives should be taken. The overview of the sites included in this report indicates that there are no reasonably available alternative sites within the Arundel area that are at a lower risk of flooding than the Fitzalan Road site and that are appropriate for specialist sheltered housing for older people.
- 7.1.2 The alternative sites identified in the report are either within the same flood zone as the site or do not meet the size and locational criteria for a suitable specialist retirement development, or otherwise have constraints for development.
- 7.1.3 For the above reasons the proposed development of 45 specialist retirement units on the Fitzalan Road site is considered to pass the sequential test. Accordingly, planning permission can be reasonably granted for the development.

8 EXCEPTION TEST

8.1.1 Policy 102 of the NPPF indicates that if, following application of the Sequential Test, it is not possible for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. It states that for the Exception Test to be passed:

- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and,
- A site specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

8.1.2 Both elements of the test will have to be passed for development to be allocated or permitted.

8.2 Wider Sustainability Benefits

8.2.1 The proposed housing on Fitzalan Road will provide wider sustainability benefits to the community that outweigh flood risk. There is an identified need for housing in the settlement of Arundel and the Council cannot demonstrate sufficient land to meet its 5 year housing land supply. The provision of high quality, well designed homes is a declared Government objective in the National Planning Policy Framework (NPPF).

8.2.2 The NPPF stipulates that the planning system should be *'supporting strong, vibrant and healthy communities'* and highlights the need to *'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community...such as...older people'* [emphasis added].

- 8.2.3 The Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled '**How should the needs for all types of housing be addressed?**' (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for 'Housing for older people'. This stipulates that *"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). Plan makers will need to consider the size, location and quantity of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied. The age profile of the population can be drawn from the Census data. Projections of population and households by age group should also be used. The future needs of older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important."* (My emphasis)
- 8.2.4 The emerging Arun Local Plan advises that the District's housing requirement is 20,000 dwellings over the Plan period to meet its objectively assessed need (OAN). The Council's current 'policy off' position is 2.07 years housing land supply, which incorporates a shortfall of 1,548 dwellings from the period 2011 -2016 via the Sedgfield method.
- 8.2.5 The Council has stated that it seeks to meet the majority of its housing need through the delivery of strategic housing allocations. Infrastructure capacity however means that the ability to deliver housing on strategic sites is constrained for the next five years.
- 8.2.6 The District Council is also 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.
- 8.2.7 The Arundel Neighbourhood Development Plan was adopted by the District Council on 30 April 2014 and now forms part of the Development Plan. The site is identified as being a suitable location for housing in *Policy 5: Land at Fitzalan Road*.

8.2.8 Arun District Council's "Updated Housing Needs Evidence" (September 2016), identifies that 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). It also advises that the population in the District aged 65 and over is expected to increase by 55% by 2031. The population aged 75 and over, the age group to be most likely to require specialist accommodation given the increased likelihood of frailty, is projected to increase by 13,274 individuals to a total of 33,482 over the same time period.

8.2.9 It is clear that there is a significant existing and future requirement for specialist older persons' housing in the Authority and this is covered comprehensively in the relevant Chapters of the Planning Statement (Chapters 3 and 4). This concludes that 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;

8.2.10 It must also be noted that the specialist retirement housing provides a range of significant benefits to both residents and the wider community. These benefits include the:

- Release of under-occupied family homes in the local area;
- Increase in additional local spending, enhancing the vitality and viability of nearby town centres
- Provision of a form of housing which addresses the on-set and increasing problems of mobility/frailty through maintaining health and general well-being.
- Improvements to health and wellbeing have significant savings in health and social care budgets.
- Provision of companionship and a self-contained community which helps to reduce isolation, loneliness and depression
- Effective and efficient use of a previously developed site in a sustainable location.

8.2.11 The benefits attributed to specialist older retirement housing are detailed more comprehensively in *Chapter 5: Benefits of Older Persons' Housing* of the Planning Statement.

8.3 Safety of the Development

- 8.3.1 The planning application for the proposed construction of 45 specialist sheltered apartments is supported by a Flood Risk Assessment by Arch Associates. This demonstrates that flood-proofing measures have been incorporated into the proposed design to reduce flood risk and that such measures will not increase flood risk elsewhere.
- 8.3.2 Existing Tidal flooding is the principle source of flooding on the site. The site is located within Flood Zone 3 but existing flood defences reduce the predicted 1 in 200 year event + climate change level to 2.55m AOD (maximum), which is below much of the existing site topography.
- 8.3.3 When the flood defences are in effect, the site is defended against fluvial flooding for the 1 in 100 year event plus climate change.
- 8.3.4 The Environment Agency advised a minimum ground floor level of 3.88m AOD which equates to the 1 in 200 year Tidal Flood level (undefended) of 3.58 m +300 mm freeboard. The ground floor slab level proposed is 3.9m AOD. The finished floor level for the habitable areas exceeds the maximum flooding levels so there is no risk to the proposed apartments even in an extreme fluvial flood event.
- 8.3.5 Safe access from the site during a 1 in 200 year defended tidal event is found to the east of the site where occupants have a safe route towards Queen Street Bridge.
- 8.3.6 Even allowing for undefended predicted tidal flooding (allowing for climate change) a 1 in 200 year extreme flood event would only be about 700 mm above the existing site / road level and this would be limited to only a few hours either side of mean high water. The site is therefore still likely to be accessible by emergency vehicle on Fitzalan Road. Local flood warning predicts significant tidal flood events in advance and therefore advance warning of an extreme event is likely to be given, thus avoiding any risk to the safety of residents.
- 8.3.7 Accordingly, the proposed development satisfies the second criterion of the Exceptions Test. Consequently as the proposal meets both criterion, the Exceptions test is satisfied.

9 CONCLUSION

- 9.1.1 We have undertaken a thorough and robust assessment in accordance with NPPF policy and its recognised planning guidance.
- 9.1.2 The sequential assessment has reviewed public data sources that have and will guide development opportunities within the settlement of Arundel. Consideration has been given to a range of sites to examine if they are reasonably available and satisfy site size and location criteria for the specialist retirement housing.
- 9.1.3 The next step after the Sequential Test is the Exception Test. The criteria have been examined and appropriately responded to. The Fitzalan site satisfies the Exception Test.
- 9.1.4 We conclude that the development of the Fitzalan site accords with the requirements for assessment and examination.

APPENDIX A

**EMAIL CORRESPONDENCE BETWEEN LPA &
APPLICANT REGARDING THE SCOPE OF THE
SEQUENTIAL TEST (08.06.2017)**

Ziyad Thomas

From: David Easton
Sent: 08 June 2017 14:38
To: [REDACTED]
Subject: RE: Pre-Application Advice for Land at Greenhurst & Blatreat 14 Fitzalan Road, Arundel (REF: PAA/224/16)

Dear Mr Thomas,

I apologise for the delay in coming back to you in relation to this matter. I had incorrectly marked this email as dealt with and have unfortunately been out of the office.

However, I can confirm that the Local Planning Authority agree with the scope of the sequential test.

Please do not hesitate to contact me should you wish to discuss this matter further.

Yours Sincerely,
David Easton.

From: Ziyad Thomas [REDACTED]
Sent: 09 May 2017 14:33
To: Planning
Cc: Peter Tanner
Subject: Pre-Application Advice for Land at Greenhurst & Blatreat 14 Fitzalan Road, Arundel (REF: PAA/224/16)

F.A.O. Mr. D Easton

I write in regards to the above application for which Renaissance Retirement Living received written pre-application advice from yourself on the 3rd of February 2017. The company is now duly preparing an application taking the advice received into consideration.

The Pre-Application advice stipulates a requirement to submit a Flood Risk Assessment and Sequential Test documentation. We are preparing both pieces of work presently but would appreciate agreeing the scope of the latter specifically the area of search for alternative sites. We propose that:

- The site must be located within the settlement of Arundel, as it is intended to meet the needs of older persons' within this settlement;
- The site is in close proximity (800metres or 0.5 miles) from a good range of shops, services and public transport to best promote the continued independence of the intended residents.

In relation to the second point I would like to bring to your attention a recent appeal decision (PINS Ref: APP/Q3305/W/16/3143325) in which the local planning authority (Mendip District Council) contested the rationale for a specialist retirement housing developer (Churchill Retirement Living) for limiting the search for suitable alternative sites to within a 0.5miles radius of the city centre. The appeal decision is attached for your convenience.

The Examiner concluded the following:

'... there is clearly some sense in what leads to the appellant's definition of the catchment area. Half a mile is a reasonable walking distance to shops, services and facilities for the elderly who may be active but no longer have a car of their own – it means they can retain a certain independence and that they would not, without the assistance of friends or relatives, be effectively confined to where they lived.' (Paragraph 25.)

In light of the above we consider that the search for suitable alternative available sites for the Sequential Test should be limited to a 0.5 miles radius from Arundel town centre.

I would be grateful for your thoughts on the above, so that we can undertake the required work as quickly as is practicable.

My thanks in advance,

Kind regards

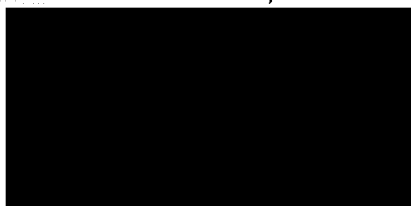
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APPENDIX B

Planning Appeal Decision

(APP/Q3305/W/16/3143325) Land at the Tesco

Store Site, West Street, Wells (07.04.2016)



Appeal Decisions

Hearing held on 14 March 2016

Site visit made on 14 March 2016

by John L Gray DipArch MSc Registered Architect

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 07 April 2016

Appeal Ref. APP/Q3305/W/15/3137740

Land at the Tesco Store site, West Street, Wells, BA5 2DZ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Churchill Retirement Living against the decision of Mendip District Council.
 - The application, ref. 2015/1232/FUL, dated 29 May 2015, was refused by notice dated 28 August 2015.
 - The development proposed is 32 sheltered apartments for the elderly including communal facilities, access, car parking and landscaping, plus the diversion of an existing culvert and the creation of a new open channel.
-

Appeal Ref. APP/Q3305/W/16/3143325

Land at the Tesco Store site, West Street, Wells, BA5 2DZ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Churchill Retirement Living against the decision of Mendip District Council.
 - The application, ref. 2015/2407/FUL, dated 9 October 2015, was refused by notice dated 8 January 2016.
 - The development proposed is 30 sheltered apartments for the elderly including communal facilities, access, car parking and landscaping, plus the diversion of an existing culvert and the creation of a new open channel.
-

Procedural matters

1. At the hearing, the appellant withdrew appeal ref. APP/Q3305/W/15/3137740. Confirmation was received by an email to the Planning Inspectorate dated 16 March 2016. The withdrawal was possible because amendments to application ref. 2015/1232/FUL were submitted to the Council but too late to be consulted upon and considered, those amendments were the appellant's preferred scheme and, to all intents, they were also the subject of the subsequent application ref. 2015/2407/FUL and appeal ref APP/Q3305/W/16/3143325.

Decision

2. Appeal ref. APP/Q3305/W/16/3143325 is allowed. Planning permission is granted for 30 sheltered apartments for the elderly including communal facilities, access, car parking and landscaping, plus the diversion of an existing culvert and the creation of a new open channel, on land at the Tesco Store site, West Street, Wells, BA5 2DZ, in accordance with the terms of the application,

ref. 2015/2407/FUL, dated 9 October 2015, subject to the conditions set out in the schedule attached to this decision.

Main Issues

3. There were three reasons for refusal of the application subject of appeal ref. APP/Q3305/W/16/3143325. The third of these was resolved by the submission to the hearing of an executed section 106 planning obligation.
4. There remain two main issues in the appeal. The first is the appropriateness of the proposed design, bearing in mind the settings of the nearby grade-II-listed West Street House and the Wells Conservation Area. The second is whether the appeal site's location within Flood Zone 2 should militate against the proposed development.

Reasons

First main issue – design

5. The appeal site is in an area of what might be called mixed townscape character. It is part of the site of the existing Tesco supermarket, which stands to the east of the appeal site itself. It is a fairly typical supermarket design, with brick walls, blank towards the appeal site, a strong lead (or lead-like) eaves/gutter detail and hipped tiled roofs. There is an implemented planning permission for the extension of the supermarket, although, as this appeal suggests, Tesco does not intend, at least at the present time, to complete it. The site itself is essentially cleared, though evidence of the former engineering works remains and high brick walls have been built near to the northern and western boundaries, apparently in implementation of the extant permission.
6. The northern boundary of the site is on Ethel Street, which has a Victorian terrace on its north side, within the Wells Conservation Area. The terrace is two-storeyed (though some of the houses have dormers in their roofs), stone-built and roofed with concrete tiles. To the west is the fairly recent St Andrews Mews residential development. The buildings on West Street, opposite the appeal site, are 2-, 2½- and 3-storeyed, some stone-faced, some rendered. At the south-western corner of the appeal site stands the Wells Trading Post, part of a former mill complex, two-storeyed, stone-built (part painted) and roofed partly with profiled metal sheeting. Abutting it to its south is West Street House, an elegant late-18th or early-19th century building, three-storeyed, with rendered and colour-washed walls and slate roofs; it has a prominent south-facing double gable. A short distance to the north of the appeal site on the west side of West Street stands a Royal Mail sorting office, a pleasant and unashamedly modern design, the equivalent of two storeys high, brick-built, under a very shallow pitched roof.

Design approach

7. In this context, a 2½-storey development, its eaves and ridge heights similar to those of neighbouring buildings, does not seem inappropriate in principle. The Council would like to have seen development at the back-of-footpath along West Street to give better definition to the street scene. That is an entirely understandable desire and could work for the northerly part of the frontage – although, the further south such a frontage extended, the more it might be likely to cause problems of daylighting or loss of privacy for the occupiers of then houses opposite. Three things militate against this suggestion, however.

8. Firstly, there is a culvert to be diverted up the eastern side of the appeal site to cross West Street and connect with an existing culvert. Whatever line that might take, it would certainly prevent back-of-footpath development along the southern half of the appeal site.
9. Secondly, the appellant pointed out that the nature of the proposed development meant doors opening on to patios for the occupiers of the ground floor apartments; and that this sort of development would normally stand within an attractive landscaped curtilage rather than directly on the back-of-footpath. In design and townscape terms, however, that cannot carry significant weight – because a different type of residential development could achieve the objective, were it thought essential.
10. Thirdly, the overall townscape context does not demand development on the back-of-footpath. The Tesco supermarket is a large free-standing building with an extensive car park to its north and east. The Ethel Street terrace has small front gardens separating the houses from the road. The St Andrews Mews development is an attractive modern interpretation of traditional design but its houses do not stand directly on West Street. The sorting office, while an attractive building, pays no attention to the style of its surroundings.
11. In broad terms, therefore, there is no reason to require a design that stands on the back-of-footpath for part of its West Street frontage.
12. The proposed design is also criticised for its mass, scale and height – not so much individually as in combination, because they lead to a building which, in the Council's opinion, would be perceived as one with a large footprint and a correspondingly large mass. It is debatable whether that would be so.
13. The building would indeed have a large footprint – over 50m long and, on average, about 17m wide. However, the apartments would face outwards on its east, north and west sides and each of those facades would have some of the characteristics of a traditional terraced residential development. In particular, the roof planes on those three facades would give the impression of a building about 8m deep, akin to the spans of the Ethel Street terrace and the St Andrews Mews development. It is true that the visual sub-division of the facades into individual dwellings that one would expect to see in a traditional terrace would be missing here – but that cannot count heavily against a scheme that would otherwise, in its height, apparent roof spans and general fenestration, have the general scale and style of a residential development.

The setting of West Street House

14. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be paid to the desirability of preserving or enhancing a listed building or its setting.
15. There can be no doubt that West Street House deserves its grade II listing. It is an elegant double-pile house and signifies the standing of the owner of the adjoining mill (as it used to be). In truth, the former mill building abutting it to its north is the only remaining remnant of its original setting. There is 20th century inter-War housing to its south, the rear of a Lidl supermarket of somewhat utilitarian design to its south-west and the St Andrews Mews development to its north-west.
16. Irrespective of what has already happened, however, the proposed development would have no harmful impact on the setting of the listed building. There would be no visual inter-connection between the two within

West Street. The former mill building stands between them on the east side of the street and the alignment of the road means that, even from its west side, one could barely see the listed building and the proposed development in the same view. And, when walking up or down West Street, the two buildings would not be experienced close enough together for the proposed building to be thought to diminish, or even materially affect, the setting of the building.

17. Nor would the relationship at the rear be harmful. The proposed development would be far enough from the listed building not to intrude significantly into its setting. The southerly façade would anyway appear as a double gable of relatively traditional proportions and thus not out of keeping with the form of the listed building. And, in approaching along West Street from the south, that façade would not be visible because of the intervening tree growth on the appeal site and in the gardens of West Street House and the house immediately to its south. Even if all of that vegetation were to be removed, the façade would be sufficiently far away as not to appear higher than the first floor windows in West Street House, thus not detracting from the prominence in the street scene of the listed building's double gable.

The setting of Wells Conservation Area

18. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area. There is no statutory duty regarding the setting of a conservation area although the National Planning Policy Framework (NPPF), in addressing the effect of proposed development on the significance of a heritage asset, has the effect of bringing setting into play.
19. The Council says that the harm would be less than substantial (as in paragraph 134 of the NPPF). It is questionable, however, whether there would be any harm at all. Wells Conservation Area is hereabouts well defined. The Ethel Street terrace and its mirror image on Tucker Street appear to be part of the same Victorian development. It is wholly appropriate that the Conservation Area boundary encompasses both. At the same time, there is no doubt where that boundary must lie – the Tesco car lies to the east, the supermarket itself to the south-east and south, the appeal site to the south and the sorting office to the east; only the St Andrews Mews development to the south-west is residential, though with a very different character and appearance.
20. The proposed development would be evidently residential. It would have certain characteristics in common with Ethel Street and St Andrews Mews. Where the Conservation Area boundary lay would not be put into doubt by the development. Overall, there would be no harm to the significance of the Conservation Area as a designated heritage asset.

The listed hydrant on Ethel Street

21. There is another listed 'building' – a hydrant in the footpath along the northern boundary of the appeal site. Its setting can only be improved by the landscaped curtilage of the proposed development, which would replace the existing fencing and wall.

Conclusions on the first main issue

22. The design of the proposed development would be appropriate to its context. It would harm neither the setting of the listed West Street House nor the significance of the Wells Conservation Area. It would not conflict with Policy DP3 of the adopted Mendip District Local Plan or the provisions of the NPPF.

Second main issue – flood risk

23. The Environment Agency says that the appeal site lies partly in Flood Zone 1 and partly in Flood Zone 2 – although its Flood Map suggests the site is wholly in the latter. Notwithstanding that, the Agency, on examining the Flood Risk Assessment (FRA) and the Flood Management Plan (FMP), raised no objection subject to the Council being satisfied on the Sequential Test.
24. The Sequential Test aims to steer new development to areas with the lowest probability of flooding. The appellant confined the search for suitable alternative sites to within a 0.5km radius of the city centre (although modifying this to half a mile at the hearing). It found none. The Council, on the other hand, saw no reason to limit the search even to Wells itself, saying that an appropriate catchment area would be the whole of the District, all the more so as potential residents could come from much further afield.
25. The Council's stance appears to give little weight to two factors. Firstly, there is a need for housing for the elderly generated from within the District as well as beyond it. The Local Plan notes that Wells' greatest challenge is its ageing population and that ongoing demand from in-migrants is reducing the limited supply of housing and adding a premium to housing values. Secondly, there is clearly some sense in what leads to the appellant's definition of the catchment area. Half a mile is a reasonable walking distance to shops, services and facilities for the elderly who may be active but no longer have a car of their own – it means they can retain a certain independence and that they would not, without the assistance of friends or relatives, be effectively confined to where they lived. Both of these factors weigh in favour of the proposal.
26. The NPPF and the Planning Practice Guidance (PPG) address the Sequential Test and the Exception Test, the latter not coming into play unless the former reveals no suitable sites. On the Council's stance, there are suitable alternative sites within Flood Zone 1, albeit further from the city centre (or not in Wells at all). On the appellant's, there are none. The PPG defines defined residential development (including for the elderly) as "more vulnerable" and considers such development appropriate in Flood Zone 2.
27. In the circumstances of this appeal, where the Environment Agency raises no objection, based on the FRA and FMP, where location within half a mile of the city centre is clearly sensible and where there is no suitable alternative within that radius, it would be appropriate to allow the appeal proposal to go ahead.
28. To sum up, there is no compelling reason why the location within Flood Zone 2 should militate against the proposed development. There is no conflict with Local Plan Policy DP3 or with the provisions of the NPPF and PPG. It is important to this conclusion, however, that the finished ground floor level should be no lower than 33.20m AOD, as recommended in the FMP.

Other matters

29. Parking provision was considered inadequate in relation to the now withdrawn appeal but the matter was subsequently clarified. There was no reason for refusal of the subsequent application on these grounds.
30. The vehicular access now has a 1.2m footpath alongside it leading to the main entrance of the building; and there would be a 1.8m footway on the west side of West Street from the site access up to Ethel Street. The footpath from the rear entrance, and from the buggy store and cycle stand, has been realigned

away from the Tesco service access. Together, those measures alleviate concerns on the first application about the safety of vulnerable road users.

31. The effect of the vehicular access would be to remove either one or two on-street parking spaces, to which there can be no compelling objection. Visibility for drivers leaving the development might be hampered by parked cars on West Street but appropriate landscaping would afford some additional visibility from within the site. Also, vehicle speeds are bound to be very low in West Street, constrained by the junction about 16m to the north of the access and the bollards preventing through traffic little more than 30m to the south. The access cannot be considered dangerous.
32. Part of the proposal involves opening up the St Andrews Stream where it is presently culverted along the southern boundary of the appeal site. The stream is not culverted at the rear of the supermarket, it can be seen passing under the former mill building and West Street and it is open along the southern boundary of the St Andrews Mews development. To open it up across the appeal site is to be welcomed, even if there would be no public access to it. Any future concern about the safety of the elderly occupants of the development could no doubt be resolved by an appropriately designed railing.

Conditions and obligation

33. The Statement of Common Ground suggests fourteen conditions in the event of the appeal being allowed (one being the statutory time limiting condition and one applying only to the now withdrawn appeal). A condition identifying the approved plans is necessary to ensure that what is built is what was approved. A condition limiting the use of the building to what is proposed in the application is appropriate since other uses, even within the same Use Class, could necessitate inappropriate alterations or requirements.
34. Conditions on external materials would ensure appropriate design standards, although the appearance of brickwork can be controlled without a sample panel and window and door details should admit of materials other than timber. Control of landscaping is also necessary to ensure an appropriate quality of development and conditions should cover hard surfacing and boundary treatments as well as planting. It is appropriate to control surface water drainage by a planning condition but there is no need for one to control foul drainage, which is the subject of other legislation. In order that residents are properly catered for, conditions should ensure that access, parking, the buggy store and cycle parking have been provided before any occupation of the building.
35. The recommendations of the Extended Phase 1 Ecological Assessment are specific; rather than requiring the scheme to be implemented in accordance with those recommendations, the Assessment can be referred to in the landscaping condition (influencing planting specifications), the construction method statement condition (the timing of vegetation clearance, in addition to the various other matters affecting highways and residential amenity during the construction phase) and an additional condition on lighting (necessary for amenity as well as ecological reasons). A decontamination condition is clearly necessary given the former use of the site as an engineering works. The Noise Impact Assessment recommended only that the boundary wall with the Tesco service yard be increased to 4.0m in height and lengthened towards the northern boundary; the suggested condition can be made more specific.

36. In addition to the suggested conditions, two others are necessary – on external lighting, referred to above; and to specify a minimum finished ground floor level, to ensure compliance of what is built with the FMP.
37. The obligation provides for a financial contribution towards “the provision of open space facilities which benefit future residents of the development”. Clearly, housing for the elderly does not generate any need for play space or playing fields. However, if the contribution goes towards other open space provision, then it satisfies Community Infrastructure Levy (CIL) Regulation 122, being necessary to make the development acceptable in planning terms, directly related to it and fairly and reasonably related to it in scale and kind.

Overall conclusion

38. There is no objection in relation to the two main issues and the conditions considered above can secure appropriate control over the standard and quality of development. The appeal may be allowed.


Inspector

APPEARANCES

FOR CHURCHILL RETIREMENT LIVING

Andrew Burgess	Managing Director, Churchill Retirement Living
Dermot McCarthy	South West Design Director, Churchill Retirement Living
Paul White	Technical Director, Heritage, Ecus
Sam Collins	Land Buyer, Churchill Retirement Living

FOR MENDIP DISTRICT COUNCIL

Oliver Marigold	Principal Planning Officer, Mendip District Council
Robert Palmer	Conservation Officer, Mendip District Council

INTERESTED PERSONS

Robert Horton	Expressing the views of local residents
Simon Russell	Amethyst Property Investments Ltd (retained by Tesco)

DOCUMENTS submitted at the hearing

- 1 Letters of notification and distribution lists for the two appeals
- 2 Statement of Common Ground
- 3 *City of Wells (Principal settlement)*, consultation on Local Plan Part 11
- 4 Extract (pp. 72-73) from Local Plan Part 1
- 5 Executed obligations

Appeal Ref. APP/Q3305/W/16/3143325
Land at the Tesco Store, West Street, Wells, BA5 2DZ
Schedule of conditions attached to planning permission

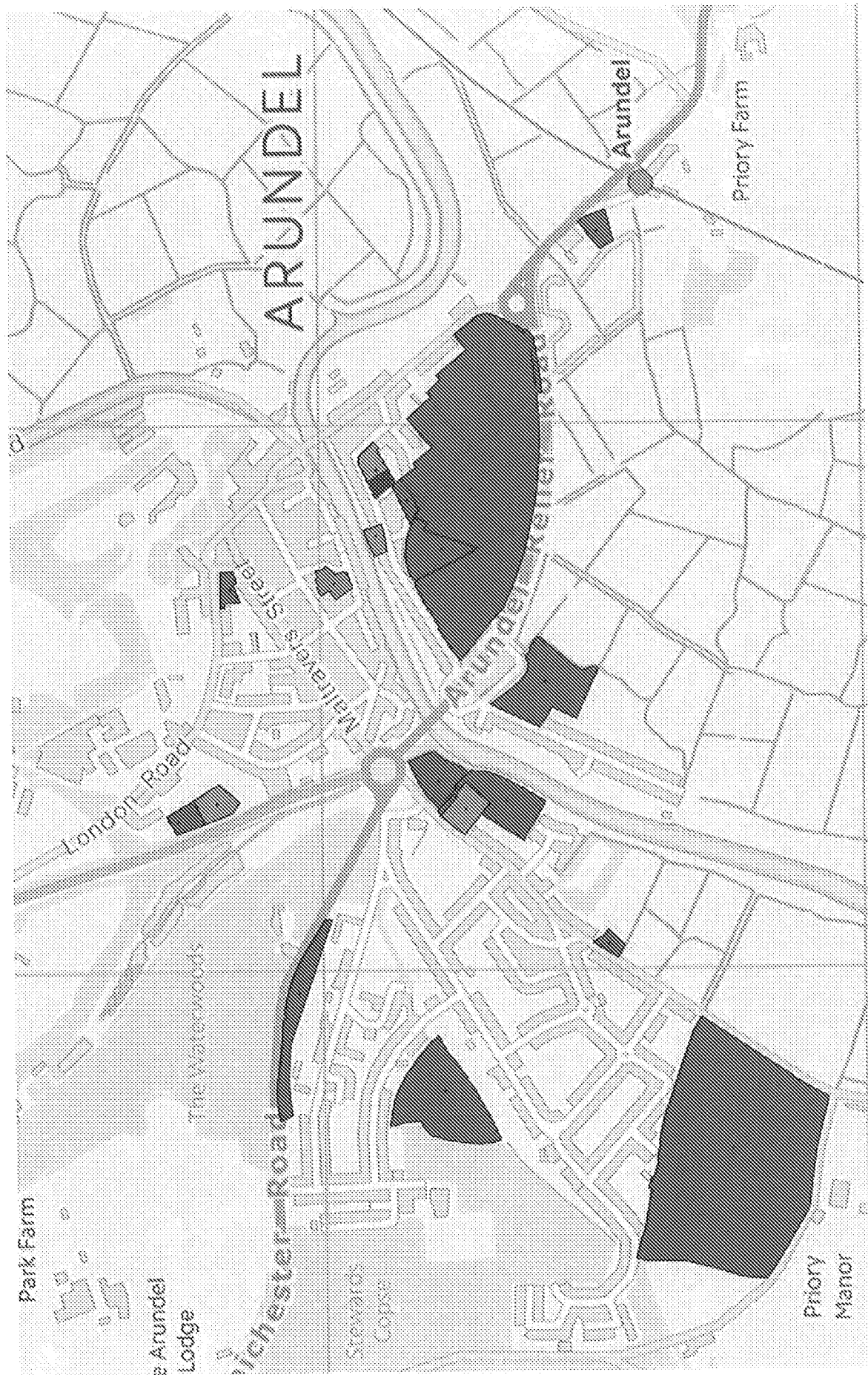
- 1) The development hereby permitted shall begin not later than three years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans: 10074WL – P00, P01/B, P02/C, P03/A, P04/A, P05/A and P06/C.
- 3) The development hereby permitted shall be used as sheltered accommodation for persons over the age of 55 and for no other purpose, including any other purpose within Class C of the Town and Country Planning (Use Classes) Order 1987 as amended or any order revoking and re-enacting that Order with or without modification.
- 4) The finished ground floor level of the building hereby permitted shall be no lower than 33.20m AOD.
- 5) No development shall take place until details and/or samples of the materials to be used in the construction of the external surfaces of the building hereby permitted have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.
- 6) No stone or stone-faced wall shall be constructed until a sample panel of stonework has been erected on site and approved in writing by the local planning authority. All stone or stone-faced walls shall be constructed in accordance with the approved sample panel.
- 7) No development shall take place until full details of all doors, windows and dormer windows have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.
- 8) No development shall take place until full details of both hard and soft landscape works have been submitted to and approved in writing by the local planning authority. The details shall include: proposed finished levels or contours; means of enclosure; boundary treatments (including works to the existing boundary wall with the Tesco service area, as recommended in the Noise Impact Assessment dated 28 May 2015 by Planning Issues Ltd); car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; proposed and existing functional services above and below ground; planting plans, including written specifications of cultivation and other operations associated with plant and grass establishment; schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate (bearing in mind the recommendations of the Extended Phase 1 Ecological Assessment dated May 2015 by ECOSA); an implementation programme; and a management and maintenance programme for a period of five years from completion. Development shall be carried out in accordance with the approved details and implementation programme and maintained thereafter in accordance with the approved management and maintenance programme.
- 9) No development shall take place until full details of all external lighting have been submitted to and approved by the local planning authority. The details shall incorporate the recommendations of the Extended Phase 1 Ecological Assessment dated May 2015 by ECOSA. Development shall be carried out in accordance with the approved details.

- 10) No development shall take place until full details of surface water drainage have been submitted to and approved by the local planning authority. No apartment shall be occupied until the surface water drainage has been completed in accordance with the approved details.
- 11) No apartment shall be occupied until the following have been completed, all in accordance with details first submitted to and approved by the local planning authority:
 - the means of vehicular access on to the site;
 - the space within the site for cars to be parked and for vehicles to turn so that they may enter and leave the site in forward gear;
 - the footpath access from Ethel Street, both on West Street and within the site;
 - the buggy store; and
 - the cycle stand.
- 12) No development shall take place until:
 - a strategy for investigating contamination present on the site has been submitted to and approved in writing by the local planning authority;
 - an investigation has been carried out in accordance with the approved strategy; and
 - a written report, detailing the findings of the investigation, assessing the risk posed to receptors by contamination and a proposing remediation scheme, including a programme for implementation, has been submitted to and approved in writing by the local planning authority.

Remediation work shall be carried out in accordance with the approved remediation scheme and programme. Remediation work on contamination not identified in the initial investigation but found during construction work shall be carried out in accordance with details submitted to and approved in writing by the local planning authority subsequent to its discovery.
- 13) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period and shall provide for:
 - i) the hours of construction work;
 - ii) the timing of vegetation clearance (in accordance with the recommendations of the Extended Phase 1 Ecological Assessment dated May 2015 by ECOSA);
 - iii) the parking of vehicles of site operatives and visitors;
 - iv) the loading and unloading of plant and materials;
 - v) the storage of plant and materials used in constructing the development;
 - vi) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - vii) wheel washing facilities;
 - viii) measures to control the emission of dust and dirt during construction;
 - ix) a scheme for recycling/disposing of waste resulting from demolition and construction works.

APPENDIX C

**Sites within the settlement of Arun identified
in the Arun District Council Housing and Economic
Land Availability Assessment (HELAA)**



APPENDIX D

Rightmove Search for Land & Commercial Property in Arundel (May 2017

Arundel

+ 0 miles

Min Price - Max Price -

Property Type -

Filters -

Commercial Properties For Sale in Arundel, West Sussex

1 results

List

Grid

Sort: Relevance

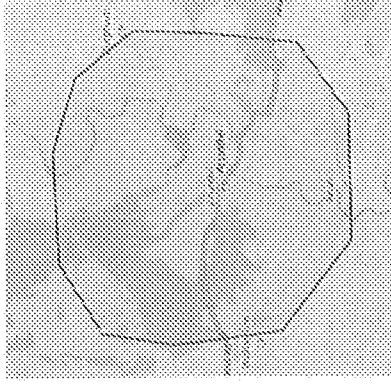


Hotel for sale
The Norfolk Arms Hotel, 22 High Street, Arundel, United Kingdom, BN18 3AB
Leasehold, 33 en suite refurbished letting bedrooms, Grade II Listed Coaching Inn, Town centre location. Two restaurants, bars & function rooms. External trade areas 1700

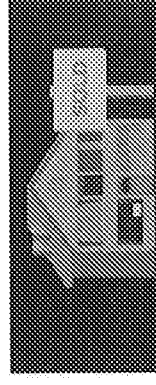
Marketed by Christie & Co, Winchester

£750,000 Guide Price

Email agent



See commercial properties to let in Arundel



See how much property in this area is selling for with the latest land registry data

Check sold prices for this area >>

Arundel

Land For Sale in Arundel, West Sussex

+ 0 miles

sq. ft.

Min Size

Max Size

Min Price

Max Price

Property Type (1)

Filters

0 results

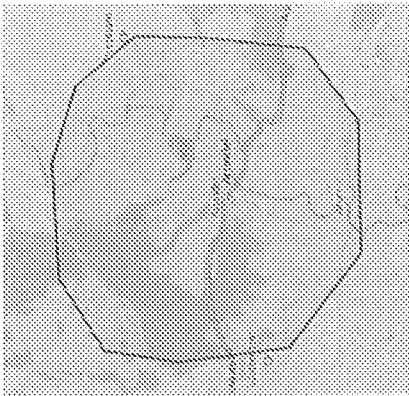
Sort: Relevance

Grid

List

Your search has returned 0 results

There are no available properties matching the criteria which you have specified.
In order to return more great properties in your searches, try adjusting your search criteria.

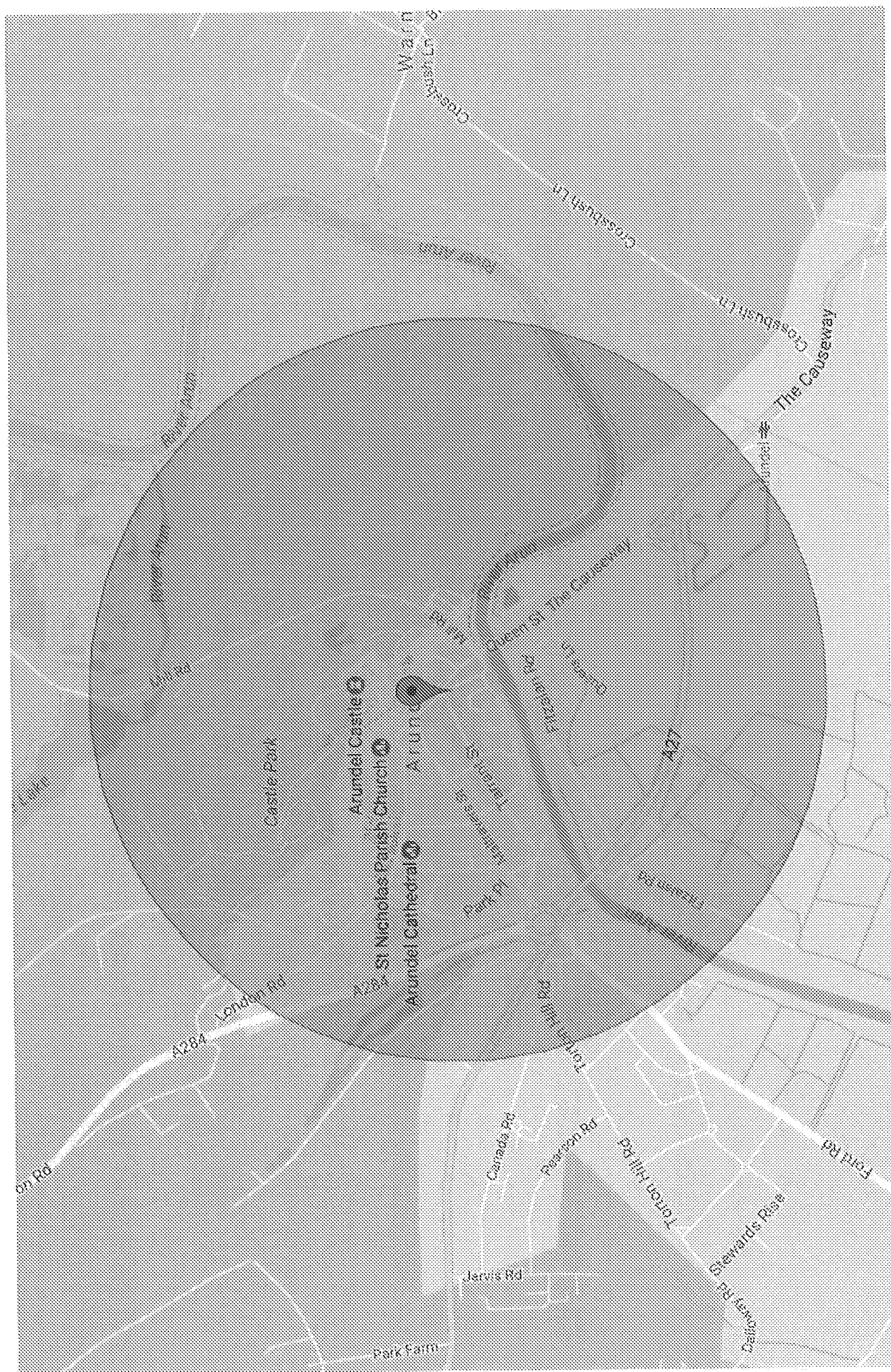


→ See commercial properties to let in Arundel

- Nearby Arundel
- Littlehampton
 - Rustington
 - Barnham
 - Angmering-On-Sea
 - Ysopon
 - Amberley
 - Woburn
 - Worthing
- Locations within West Sussex on a map

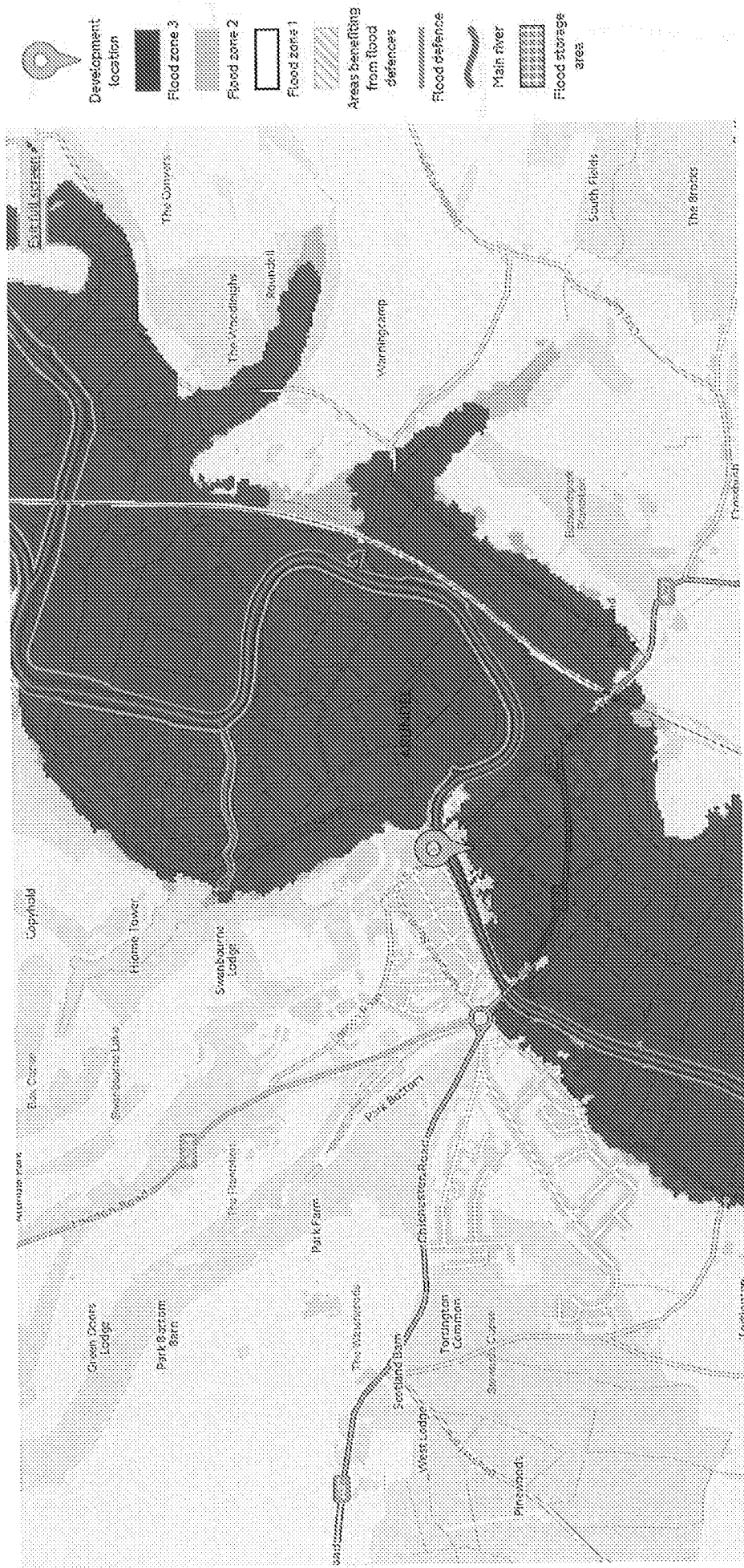
APPENDIX E

**MAP DETAILING AREA WITHIN 0.5 MILES OF ARUNDEL
TOWN CENTRE**



APPENDIX F

FLOOD MAP FOR PLANNING IN ARUNDEL



APPENDIX G

MAP SHOWING INDIVIDUAL ASSESSMENT SITES

