

[REDACTED]

[REDACTED]

From: Peter Tanner [REDACTED]
Sent: 17 October 2018 12:38
To: Anita Gardner
Cc: Simon McFarlane; Nick Watkins; Laurie Marlow; Alex
Subject: Re: Blastreat and Greenhurst, Fitzalan Road, Arundel - Application AB/36/18/PL

Anita

Further to my email of 16 October 2018, I note that the development viability assessment carried out by Searle Dixon on behalf of the Council has been posted on the Planning Register website.

I have requested our viability consultant to consider that assessment report and I will get back to you with their comments early next week.

In the meantime, I enclose a copy of the Phase 1 Road Safety Audit (RSA1) carried out by GM Transport Consultants, as requested by the Highways Officer. The RSA has been carried out in accordance with the Design Manual for Roads and Bridges (DMRB) Highways Directive (HD) 19/15. Having carried out the audit the auditors raise no highway issues with regard to the proposed development.

I would be grateful if you could forward the RSA1 to the local Highway Authority for their completion of the certificate set out in Appendix C to the Audit.

In the meantime, could you please provide me with some times and dates when it would be convenient to meet with you at your office to discuss the various matters raised in the statutory consultation responses and by various third parties.

Regards

Peter Tanner

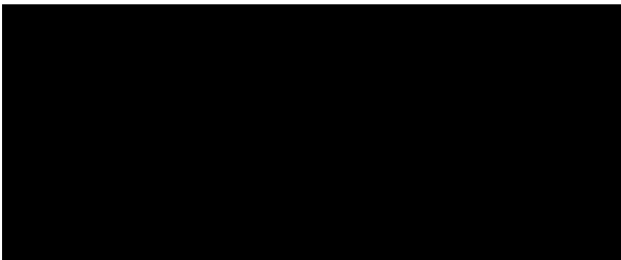
Planning Director



RENAISSANCE

RETIREMENT

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On Tue, 16 Oct 2018 at 15:51, Peter Tanner [REDACTED] wrote:

Dear Anita

Can you please let me know if you have received the development viability assessment carried out by Dixon Searle on behalf of the Council.

Once we have received that viability assessment I consider it would be useful to meet to discuss whether you have any outstanding matters that you wish me to address and to resolve any matters arising from the formal consultee responses and any other matters raised by third parties.

In the meantime, I set out below a summary and our responses to the various consultee comments received, and to comment on the concerns raised by both Arundel Town Council, the AHA group and other third party representations received by your office.

Archaeology Advisor - No objection - Comments that it is unlikely that the proposal would adversely affect any known archaeological interest to warrant refusal of planning permission.

Arun DC, Monitoring and Records Officer - Seeks a total planning obligation contribution of £15,031 and comprising,

- £13,897 as a contribution towards additional library stock;

- £1,134 Fire and rescue Services Contribution - *"to be used towards supply and installation of additional fire safety equipment to vulnerable persons homes in West Sussex Fire Rescue Services Southern Area serving Arundel"*.

Our Comment / Response:

The Library Contribution equates to £302 per household to be spent on additional library stock. Whilst this seems excessive, we would have no objection to making this payment.

The Fire and Rescue Services Contribution to provide additional fire safety equipment to vulnerable persons homes in the Arundel area is not reasonable or directly related to the proposed development. Accordingly, the Fire and Rescue Services Contribution would fail to satisfy the three tests set out in Regulation 122 (2) of the Community Infrastructure Regulations 2010 and would be unlawful.

Arun DC, Parks and Landscapes Department - No objection - Proposed landscape detail provided is appropriate and sufficient in detail.

Southern Water - Recommend that in the event of planning permission being granted a condition should be applied requiring that construction of development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to and approved by the LPA in consultation with Southern Water. They also comment,

- No objection to diversion of the public sewer crossing the site subject to various criteria;
- That Southern Water have carried out an initial desk study that suggests that the additional foul sewerage flows from the proposed development might result in an increased risk of flooding unless network reinforcement is provided by Southern Water.

Our Comment / Response:

On 14 August 2018 in response to Southern Water's comments the applicant submitted to the LPA a 'Pre and Post Development Flow Rates Comparison Report' prepared by engineering consultants Arch Associates. This report identifies that existing surface water and foul water from the site both discharge into the public foul sewer in Fitzalan Road. It reports that the proposed development will only discharge foul sewerage into the public foul drain and surface water will be infiltrated into the soil within the site. Given that only the foul water from the post-development site will be discharged into Southern Water's foul main sewer network, this will result in a reduction of over 90% over the existing combined run-off rate. Accordingly, the proposed drainage strategy will result in a betterment over the existing combined surface water and sewage flows and therefore will have no negative impact to the Southern Water's existing public sewer network in Fitzalan Road.

Details of the drainage strategy to serve the proposed development is set out in the 'Drainage Strategy Report' prepared by Arch Associates and which accompanied the Planning Application.

Sussex Police: Designing Out Crime Officer (DOCO) - The DOCO notes the various security features included within the design proposals together with the secure access arrangements and the staffing arrangements of a Concierge / House Manager. The DOCO sets out recommendations to prevent unauthorised access; to clearly define separation between public and private areas; and for the use of secure door and window sets.

Our Comment / Response:

The proposed development is designed to accord with the requirements of the Building Regulations Approved Document Q: Security - Dwellings. It also provides additional security features as set out in the Planning Statement that accompanied the Planning Application that will ensure the development fulfils the requirements of Secure By Design.

The proposal will satisfy all of the guidance suggested by the DOCO with the exception of providing controlled access to corridors leading from the central communal lounge. Whilst corridors will be compartmentalised for fire regulation purposes, the recommendation that there

should be controlled access from lifts and stairwells where each resident is assigned access to the floor on which their dwelling is located via the use of a proximity reader, swipe card or key or door sets on each landing to prevent unauthorised access is considered to be too restrictive and would be contrary to the Company's aims to promote social interaction amongst residents. It is suggested that particular details relating to Secure By Design can appropriately be dealt with as a condition of planning permission and for those details to be submitted to and agreed in writing by the LPA in consultation with Sussex Police prior to first occupation of the apartments.

Arundel Town Council - Object -

1. The Council objects on the basis that the development for 45 No sheltered apartments as it is contrary to the provisions of the Development Plan, namely, Policy 5 of the Arundel Town Council's adopted Neighbourhood Plan which has identified the site for a development of approximately 24 dwellings comprising a mix of dwellings including affordable housing. Given that the Arun Local Plan 2011-2031 will have been adopted at the time the application is determined, the Council's adopted Neighbourhood Plan must be given full weight and the development should be determined in accordance with its provisions.

Our Comment / Response:

With regard to the weight that should be given to development plan policies contained in local plans and neighbourhood plans, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that any conflict between those policies must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan (Planning Practice Guidance: Paragraph: 009 Reference ID: 41-009-20160211, Revision date: 11 02 2016).

Neighbourhood Plans are also required to reflect national planning policy guidance and must not constrain the delivery of important national policy objectives. The National Planning Policy Framework is the main document setting out the government's planning policies for England and how these are expected to be applied (Paragraph: 069 Reference ID: 41-069-20140306, Revision date: 06 03 2014). The Arundel Neighbourhood Plan (2014) pre-dates the recently published review of the National Planning Policy Framework (NPPF) which was published in July 2018. Therefore, the guidance of the recently published review of the NPPF and the policies of the adopted Arun Local Plan 2018 will carry greater weight than those of the outdated Neighbourhood Plan where its policies are either in conflict with or do not reflect current planning policy and guidance.

The recently published NPPF now places greater emphasis on reusing brownfield land and to increase housing densities. In particular Paragraph 123 of the NPPF states,

"123. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

*a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. **These standards should seek a significant uplift in the average density of residential development within these areas**, unless it can be shown that there are strong reasons why this would be inappropriate;..." (Emphasis own)*

With regard to older peoples housing, the Government clearly states its intention to significantly increase the supply of housing, including meeting the needs of groups with specialist housing requirements at Paragraph 59 stating:

*"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, **that the needs of groups with specific housing requirements are addressed** and that land with permission is developed without unnecessary delay." (Emphasis own).*

Paragraph 61 of the NPPF continues, " ... size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, 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)." (Emphasis own).

The recently adopted Arun Local Plan 2018, although adopted just prior to the publication of the reviewed NPPF, generally reflects the above policy approach. Furthermore, its evidence-base on housing need includes the Arun District Council's "Updated Housing Needs Evidence" (September 2016) prepared on its behalf by GL Hearn. 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%). 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. 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**

(Emphasis, own).

It is therefore not surprising that in addition to seeking to encourage the provision of affordable housing, Policies H DM1 and H DM2 of the adopted Arun Local Plan encourages that over the Plan period a proportion of the housing provided should be of a type designed to meet the needs of older people, as identified in the most recent Strategic Housing Market Assessment.

The Arundel Neighbourhood Plan 2014 -2029 (adopted February 2014) pre-dates the latest NFFP guidance and the housing evidence base upon which the above policies of the Arun Local Plan 2018 was prepared and adopted. Accordingly, the housing policies of the recently adopted Local Plan will carry more weight than that of the out-dated Neighbourhood Plan. Therefore, it is timely that a review of the Neighbourhood Plan is currently being carried out. One would reasonably expect the Neighbourhood Plan Steering Group to have regard to the "Updated Housing Needs Evidence" prepared by GL Hearn on behalf of Arun District Council. when

reviewing the housing policies of the Neighbourhood Plan. Renaissance Retirement Ltd will be making separate representation to the 2018-2019 Arundel Neighbourhood Plan Review and no doubt these matters will be carefully considered by the appointed Neighbourhood Plan Inspector.

Notwithstanding the above, I would again draw to the Town Council's attention that reference to "*approximately 24 dwellings at Fitzalan Road*" referred to in Policy 5 of the 2014 Neighbourhood Plan does not represent a 'cap' or upper limit for the number of houses that can be accommodated on this site. I would remind the Town Council that Policy 3 of the 2014 Neighbourhood Plan was modified by Examiner Christopher Collison, in 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 Steering Group 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).

Similarly, to ensure that the adopted Neighbourhood Plan accords with the 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 Steering Group'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."

As referred to above, the reviewed NPPF now places greater emphasis on reusing brownfield land and to increase housing densities. This is similarly reflected in Policy D DM1 of the recently adopted Arun Local Plan 2018 that requires that the density of new housing will be expected to make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness, recognising that "*...Higher densities will be more appropriate in the most accessible locations...*".

With regard to mix of dwelling types, by reason of the special features, communal facilities, characteristics and management arrangements associated with sheltered housing for sale to the elderly, mixed housing within such a development is not conducive to a successful sheltered housing development. Similarly, the inclusion of affordable housing within a scheme of sheltered housing for sale to the elderly is only likely to be successful where one is dealing with very large sites where separate tenure can be satisfactorily accommodated in a separate block without compromising the viability of the sheltered housing. Notwithstanding, Renaissance Retirement are prepared to contribute to the provision of an element affordable housing by way of an off-site financial contribution to Arun District Council provided the level of contribution would not compromise viability and prevent the development proceeding. Policy AH SP2 of the Arun Local Plan 2018 recognises that a commuted sum will normally be allowed in very exceptional circumstances where supported by robust evidence including, where appropriate, viability evidence. In accordance with Policy AH SP2 Renaissance Retirement have presented to Arun District Council an Affordable Housing Statement setting out our case in support of there being very exceptional circumstances and viability evidence. The Council have appointed a specialist consultant to appraise that evidence.

Arundel Town Council (cont.) -

The Council strongly endorses the professional views of the Conservation Area Advisory Committee (the comments of the Council's current Conservation Officer not being available to view on line) that the building lacks adequate design quality and that the existing brewery buildings should be retained as a heritage asset (a request that the Town Council has repeatedly made but which has been ignored by the District Council); As such the Council objects to a proposed building that falls well below the quality and design that is required to ensure that it respects the exceptional architecture of Arundel's Conservation Area and its setting and, so, achieve the provisions of Policy HER SP 1 of the Arun Local Plan 2011-2031.

Our Comment / Response:

See our comments set out below.

Arundel Town Council (cont) -

The site adjoins a nationally important conservation area and, by reason of its unsympathetic design, scale, massing and height it would harmfully detract from the exceptional architecture of the historic core of Arundel and its setting. Thus, it would conflict with the guidance in the National Planning Policy Framework in that it fails to make a positive contribution to, but significantly harms, both the Conservation Area and its setting ~ thus also conflicting and being contrary to Policy HER SP 1 of the Arun Local Plan 2011-2031.

Our Comment / Response:

As set out in the Design and Access Statement accompanying the planning application, the proposal has evolved from a thorough assessment of the site and its surroundings and having regard to the nearby Arundel Town Centre Conservation Area and to the setting of Arundel Castle. The design of the proposal the subject of this second planning application has also evolved in positive response to the Planning Officer's comments on the earlier planning application (that earlier application was subsequently withdrawn) with the proposed building on the north part of the site designed to reflect a brewery style of architecture displaying design features found on former brewery buildings within the town and serving as a reminder of that part of the site's association to its historic past use.

The proposal will replace the unsightly conglomeration of industrial buildings and noisome use of those premises together with the redevelopment of the dwelling known as "Greenhurst" which

is of little architectural merit. The proposed development will provide residential use more appropriate and in keeping with the predominant residential character of the locality and significantly improve the appearance of this site with a building that will sit comfortably with neighbouring development in terms of its layout, height, mass, scale and palette of quality materials. In doing so the proposed development is sensitive to the special character and appearance of the nearby Conservation Area and will relate positively to that setting such that views into and out of the Conservation Area will be positively enhanced. Furthermore, as clearly demonstrated by the 'verified views' of the proposed development that accompany the planning application, the important protected views of Arundel Castle, Arundel Cathedral and of the historic core of the town will be preserved.

Arundel Town Council (cont.) -

On the other hand, the existing building on the site contributes significantly to the setting of the Conservation Area as borne out by the former District Council's Conservation Officer; the Conservation Area Advisory Committee and English Heritage, all of whom, consider it to be a building of local interest and worthy of local listing. It is capable of reuse as demonstrated by a similar scheme in Little London, Chichester. As such the Council objects on the grounds that the scheme would result in the unacceptable loss of non-designated heritage asset contrary to Policy HER SP1 of the Arun Local Plan 2011-2031 and the advice in the National Planning Policy Guidance.

Our Comment / Response:

Annex 2 to the National Planning Policy Framework (July 2018) defines 'Heritage Asset' as, *"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."*

The National Planning Practice Guidance in Paragraph 39 states that, *"A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process."* (Paragraph: 039 Reference ID: 18a-039-20140306, Revision date: 06 03 2014)

The existing building on the Blastreat site is not within the designated Conservation Area; neither is it a designated heritage asset; nor is it a non-designated heritage asset identified by the local planning authority on its local listing.

The building was not identified as a building of heritage interest in the schedule of non-designated buildings of local heritage interest that accompanied the Arundel Neighbourhood Plan (April 2004) when the site was allocated for redevelopment for housing.

As far as I am aware, the District Council has not identified the building to have significant heritage interest to warrant a heritage assessment to be carried out.

Contrary to the comment made by Arundel Town Council in their representation, Historic England has not identified the building to be a building of local interest worthy of being included on the local list of non-designated heritage assets.

Historic England did carry out an assessment of the building to examine whether it was of special architectural or historic interest to warrant its listing but in their assessment letter dated 13 April 2017 they concluded as follows,

"The Swallow Brewery has clear local historic interest, as a link to a once major industry and ties to a prominent local family. However, the former brewery building which is the subject of this assessment the last remnants of a once substantial industrial complex. Furthermore, subsequent alteration interr including the loss of any fixtures and fittings related to its original use, mean that the historic interest outweigh the lack of architectural interest and the loss of context.

CONCLUSION

After examining all the records and other relevant information and having carefully considered the architectural and historic interest of this case, the criteria for listing are not fulfilled, and therefore 14 Road is not recommended for listing."

(underlining – my emphasis)

On behalf of Renaissance Retirement Ltd, specialist heritage consultants White Young Green (WYG) carried out an appraisal of the extant buildings at No. 14 and the contribution that they make to the character and the setting of the Arundel Conservation Area and other proximate built heritage assets in accordance with published guidance adopted by Historic England (refer to the Heritage Statement that accompanies the planning application). That appraisal identifies that the proposed scheme is considered to have no harmful impact upon the significance of Arundel Conservation Area (March 1975), Arundel Castle (Grade I, 1027926), Arundel Castle Registered Garden (Grade II*, 1000170), Nos 1-5 Queen Street (Grade II, 1278001), The Cottage (Grade II, 1277934), Maltings in the Garden of No. 2 (Grade II, 1248274), No. 20 Queen Street (Grade II, 1248355); and No. 10 Queen Street (Grade II, 1250259), and preserves the special interest of each asset.

WYG as part of their heritage appraisal also considered the existing building against the criteria set out in Arun District Council's 'Buildings or Structures of Character' SPD (September 2005). WYG found the buildings to only partially meet that criteria and considered that the buildings to hold a limited level of significance, primarily stemming from its association with the lost Swallow Brewery, rather than physical architectural merit. Considering the buildings lacks significance in their own right, this limited significance is considered insufficient to warrant the retention of the building. As such, WYG recommend that the degree of harm brought about by their removal should be mitigated by an appropriate level of recording secured by condition and balanced against its low level of significance and the benefits of the scheme, in accordance with the guidance in the NPPF.

Arundel Town Council (cont.) -

- 5. The Council objects on the grounds that the development would cause considerable harm to the appearance of the streets scene along Fitzalan Road as it comprises a bulky uncompromising three storey continuous mass of building that would extend along almost the full extent of, and be set in proximity to, the narrow road frontage of the site where it would dominate and tower above other more discreet and domestic sized buildings that extend further along Fitzalan Road**

Our Comment / Response:

The proposed development has been designed to reflect the terraced pattern of development that prevails along the north east part of Fitzalan Road and which is characteristic of the predominant pattern of development in the eastern part of the neighbouring Conservation Area.

The design massing of the development purposely has been broken down into two distinct elements with a single storey link between the north east block and the south west block. The north east block draws its design influence from the local brewery vernacular architecture, as requested by the Planning Officer in response to the earlier planning application, whilst the south west block displays a more contemporary design approach which reflects the riverside wharf vernacular of nearby development including the gable features found on the Otters Quay development opposite. This, together with the articulation and stepping of the elevations along the road frontage; the use of contrasting facing materials; and the variation in the

ridge line; assists in breaking down the apparent massing of the development whilst its scale and height is reflective of nearby development. As demonstrated in the submitted 'Verified Views' and the illustrative computer generated streetscene images, the proposed development sits comfortably within its setting and in its relationship to the neighbouring Conservation Area.

Arundel Town Council (cont.) -

- 6. The physical amount of development proposed and the degree of hardstanding required to provide associated parking and turning areas results in a cramped form of development where only very limited amounts of soft landscaping can be provided and where there are inadequate turning facilities for large vehicles. As such the proposal is too large to be satisfactorily accommodated on the site and represents an overdevelopment of the site that fails to reflect the more modest, spacious, verdant and suburban character of the development along Fitzalan Road**

Our Comment / Response:

The proposed development fits comfortably on the site and provides appropriate distance of separation to neighbouring properties to ensure that there will be no harmful overlooking or harmful loss of privacy. As referred to above, the proposed frontage pattern of development reflects the predominant pattern of development along the north part of Fitzalan Road and that found in the neighbouring Conservation Area. Notwithstanding, the layout provides for a landscaped frontage to the development that will provide an appropriate landscape setting for the development whilst providing an attractive outlook for residents along the Fitzalan Road frontage. Within the body of the site the proposed layout provides garden patios to ground floor apartments with communal landscaped gardens about the building that will provide a high quality landscape setting for the building. The landscaped gardens and communal areas are designed to provide an attractive outlook for the intended elderly residents suited to their recreational needs. In an urban, edge of city centre location such as this one would not expect the same amount of garden space one would normally associate with other suburban housing locations. That is not to say that the level of amenity space around the building is either deficient or inadequate to serve the amenity needs of the intended residents. The layout provides for the functional parking and turning arrangement of the development necessary to serve the needs of the residents and their visitors without compromising the quality or layout of the proposed landscaped gardens and the visual amenity they will provide.

Arundel Town Council (cont.) -

- 7. The poorly designed development would be prominently located in the forefront and against the backcloth of, the ancient, historic town of Arundel where it would dominate and appear incongruous in views from the bypass and footpaths and**

detract from the views of the townscape of Arundel, its castle, cathedral and its special setting contrary to Policy LAN DM2 of the Arun Local Plan 2011-2031.

Our Comment / Response:

As clearly demonstrated by the submitted 'Verified Views' the proposed development will not harm the views of the townscape of Arundel, its castle, cathedral and its special setting in terms of Policy LAN DM2 of the Arun Local Plan (2018).

Arundel Town Council (cont.) -

- 8. Due to its overwhelming size, height and bulk it would result in a loss of sunlight; daylight and appear visually oppressive in neighbouring views from immediate properties adjoining and near to the site. Thus, the Council objects on the grounds that it would unacceptably harm the living conditions of neighbouring occupiers that they can expect to enjoy in this residential area.**

Our Comment / Response:

The British Research Establishment (BRE) have carried out a "Daylight and Sunlight Assessment for Proposed Development at Fitzalan Road, Arundel" submitted with the planning application. In that report BRE assess the impact of the proposed development on daylight and sunlight to neighbouring properties for planning purposes. BRE concludes that the proposed development satisfies the BRE "Site layout planning for daylight and sunlight: a guide to good practice". Accordingly, the proposal does not have any harmful impact on daylight and sunlight to neighbouring properties to warrant planning permission being withheld.

Whilst the outlook from neighbouring properties will change, the height and bulk of the building is in keeping with other nearby blocks of flats in this locality. Its appearance and distance of separation from neighbouring properties is such that it will not have any overbearing impact on neighbouring occupiers such as to warrant planning permission being withheld.

Arundel Town Council (cont.) -

9. Due to the number of units proposed and the poor internal layout of the development, it fails to provide for a level of accommodation that can provide natural light to all useable rooms and, so the Council objects on the grounds that it would secure an inadequate and substandard level of residential amenity for proposed occupiers that would be inconsistent with that prevailing in the area.

Our Comment / Response:

Renaissance Retirement Ltd are experienced designers, developers and operators of sheltered housing for the elderly. To date we have completed more than 405 retirement apartments on sites throughout the south of England. The apartments are built to a very high specification and satisfy Building Regulation Requirements. The apartments are designed to benefit from natural daylight to all habitable rooms in compliance with the BRE "Site layout planning for daylight and sunlight: a guide to good practice". The Town Council's allegations are unfounded and unsupported. Notwithstanding, the proposed retirement apartments will be offered for sale on the open market and prospective purchasers will be free to choose whether they wish to live in the accommodation.

Arundel Town Council (cont.) -

10. As the development continues to propose charging residents for on-site car parking facilities, the Council objects on the grounds that it would indirectly result in a demand for on street parking in an area where such facilities are already in great demand, thereby leading to car parking congestion and implications for highway safety.

Our Comment / Response:

Renaissance Retirement makes a nominal annual charge for residents wishing to park within the development to encourage those car owning residents who no longer need to run a car to give them up. This helps to ensure that parking spaces are not taken up by cars that are only seldom used. There is no charge for visitor parking. As far as we are aware this has not resulted in residents on any of our other developments seeking to park on-street to avoid the nominal annual parking charge. As set out in the Transport Statement that accompanies the planning application, it is well documented that residents of sheltered housing for the elderly have a lower car ownership compared to the general elderly population. It is also well documented that within the first 12 months of moving in, many car owning residents decide to give up their car due to increasing frailty and/or because of the convenience of being located within easy walking distance of shops and facilities. The decision to give up their car is also promoted by the

availability of the chauffeur driven 7 - seater people carrier provided by Renaissance Retirement and operated by the Concierge / House Manager. The combination of these factors ensures that there is sufficient on-site parking space to serve the needs of the residents and their visitors. Accordingly, the proposed development will not result in over-spill parking onto neighbouring road such as to result in congestion or other severe highway issues.

Arundel Town Council (cont.) -

11. The lack of an adequate bellmouth radii for turning vehicles to clear the footpath at the access point; the failure to provide an immediate road network that is safe for use by mobility scooters and wheelchair users and the absence of adequate turning facilities that would enable large vehicles to exit in forward gear all give rise to conditions that are likely be prejudicial to pedestrian safety, particularly in this instance, where the accommodation caters for elderly occupiers.

Our Comment / Response:

The proposed development provides for a dropped kerbed vehicular access to Fitzalan Road for vehicles entering and leaving the site. This is considered to be adequate to serve the low level and frequency of vehicle movements associated with sheltered housing for the elderly (refer to the Transport Report that accompanies the planning application). The proposed site layout provides for adequate sight line visibility at the vehicular access together with appropriate pedestrian visibility splays. The proposal provided for a new footpath along the south west part of the frontage to Fitzalan Road and will be provided with a dropped kerb crossing point to the opposite side of Fitzalan Road away from the bend in the road to the north west. This, together with the low level of vehicle movements along Fitzalan Road, will provide a safe route for pedestrians and mobility scooters from the site to the city centre. The proposed layout provides an on-site turning space to enable up to a 7 ton delivery vehicle or an ambulances to turn within the site and enable vehicles to enter and leave in forward gear. At the request of the Highway Authority a Road Safety Audit has been carried out and this has concluded that the proposed development does not give rise to any severe highway issues to warrant planning permission being withheld.

Arundel Town Council (cont.) -

12. There are serious surface water and foul drainage problems in the vicinity of the site. The Council is not satisfied from the evidence produced by the applicant that the proposed solutions to these dire problems are capable of being implemented and maintained for the lifetime of the development. Thus, the Council objects on these grounds as it considers that the development would unacceptably exacerbate the severe surface water and foul drainage problems and, thus, add to the problems currently experienced by local residents and unacceptably detract from the standard of living conditions that presently prevail in the area.

Our Comment / Response:

See response to consultation comment from Southern Water, set out above

Arundel Town Council (cont.) -

13. The development fails to provide any form of affordable housing for Arundel (to comply with the provisions of the adopted Arundel Neighbourhood Plan) or, alternatively, to accord with the District Council's Housing Strategy, which in terms of off-site provision elsewhere in the District or by way of a section 106 agreement would not be acceptable in any event to the Council given the full weight that should be applied to Policy 5 of the Arundel Neighbourhood Plan to provide such affordable housing in Arundel.

Our Comment / Response:

Renaissance Retirement have indicated that it is prepared to provide for an element of affordable housing by means of an off-site financial contribution in accordance with Policy AH SP2 of the recently adopted Arun Local Plan 2018. Policy AH SP2 allows the provision of affordable housing by way of a commuted sum in very exceptional circumstances. The planning application is accompanied by a report entitled "Off-Site Affordable Housing Statement" which sets out the very exceptional circumstances in support of an off-site commuted sum being made in this particular case. We understand that the development viability assessment that accompanied that report is being appraised by Dixon Searle on behalf of Arun District Council.

Arundel Town Council (cont.) -

14. The Council objects on the grounds that there is no need for any further accommodation for the elderly in Arundel. The application has been advanced on the grounds that there is such a need in the District but there is no evidence to substantiate a need in Arundel where an adopted Neighbourhood Plan has allocated the site for another form of housing and the emerging revision of the Neighbourhood Plan continues to allocate the site for a mix of dwellings including affordable housing. Thus, the proposal is contrary to the adopted and emerging revision of the Arundel Neighbourhood Plan.

Our Comment / Response:

The Arundel Neighbourhood Plan 2 Task Group (ANP2) Evidence Documents includes the "Updated Housing Needs Evidence" (September 2016) prepared by GL Hearn on behalf of Arun District Council and the "Rural Community Profile for Arundel (Parish)" (July 2013) prepared by Action with Communities in Rural England (ACRE) Rural Evidence Project (Oxford Consultants for Social Inclusion [OCSI]). Both of those documents point to the very high elderly population profile for both the district and for Arundel. They also indicate a significant projected increase in the local elderly population over the plan period. In the light of the projected increase in the elderly population the GL Hearn study identifies a significant need for the delivery of specialist housing for older people. The ANP2 Task Group Topics on 'Housing' identifies that very few new homes have been built in the Arundel area in the last decade. The Task Group Topic also notes that there is evidence of older households occupying large homes but comments that there is little smaller stock to downsize to. This, together with the demographic evidence, clearly provides justification for the delivery of additional specialist housing for older people. The application site is eminently suitable to accommodate a development of sheltered housing for the elderly being sustainably located on the edge of city centre within walking distance of shops and services and with good access to public transport.

At the date of writing, there are only five sheltered housing apartments within two developments available for sale to the elderly within walking distance of the town centre of Arundel. These developments are now somewhat dated and do not provide the standards and energy efficiency qualities of current new build sheltered housing. Furthermore, the ageing local population and the projected significant increase in the number and proportion of older people in Arundel over the plan period will require the delivery of a choice of new homes specially designed to serve their needs in old age. The delivery of sheltered housing for the elderly on this site will contribute to the provision for the housing needs of Arundel whilst contributing to the available local mix of dwellings. The proposed development will also contribute to the delivery of local affordable housing by way of an off-site commuted sum in accordance with national planning policy guidance and the development plan.

The Arun Conservation Area Advisory Committee (ACAAC)

ACAAC is independent of Arun District Council and is made up of representatives from various professional bodies and representatives from local amenity groups and parish councillors. They have commented on the planning application raising the following objections,

- Overdevelopment

- Lack of design quality
- Too bulky
- Existing brewery building should be retained as a heritage asset
- Proposal compromises the suburban character of the south west leg of Fitzalan Road
- Adversely affects the setting and approach to the Conservation Area.

Our Comment / Response:

Each of these points have been addressed above in our response to matters raised by Arundel Town Council. For the sake of brevity I shall not repeat our response here.

With regard to the ACAAC comment that the existing brewery building should be retained as a heritage asset, it does not appear that ACAAC have taken into consideration the appraisal of the building carried out by Historic England dated 13 April 2018 in which Historic England concluded that what little historic interest this building remnant may have it does not outweigh the lack of architectural interest and the loss of its original context to warrant its designation as a building of heritage significance to warrant its retention. Nor does it appear that ACAAC have taken into consideration the heritage appraisal carried out by WYG and reported in the Heritage Statement that accompanies the planning application. ACAAC do not appear to have carried out an assessment of the building against the criteria set out in Arun District Council's 'Buildings or Structures of Character' SPD (September 2005)

AHA! Affordable Housing In Arundel (AHA)

AHA have questioned the completeness of the planning application for validation purposes. Renaissance Retirement have responded separately to both AHA and the LPA on the matters they have raised. I shall not repeat our response here.

It is for the LPA to determine whether the application satisfies the validation requirements and are at liberty to request further information from the applicant if they consider that further information or detail is reasonable or proportionate to enable the application to be properly assessed and determined.

AHA have also made numerous allegations over the accuracy of the planning drawings and the content and findings of the submitted supporting documents prepared by our professional specialist consultants. Renaissance Retirement has responded to the LPA on the allegations raised by AHA and for the sake of brevity I shall not repeat that response here.

AHA and other third parties have raised concerns to the proposed development on its planning merits as similarly reflected in the representations made by Arundel Town Council, as set out above. For the sake of brevity I shall not repeat our response here but would refer you to the above.

I look forward to hearing from you with regard to the development viability assessment carried out by Dixon Searle. In anticipation of receipt of that report, could you please provide me with some times and dates when it would be convenient to meet at your office to discuss these matters.

Kind regards

Peter Tanner

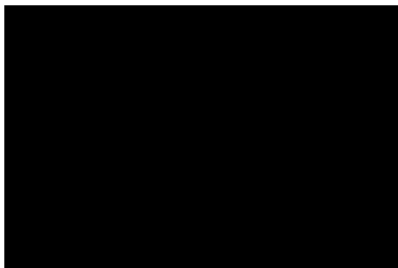
Planning Director



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