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From: Town Clerk [REDACTED]
Sent: 15 October 2018 12:21
To: Anita Gardner
Subject: Planning Application AB/36/18/PL - Fitzalan Road Development

Dear Anita

Re Planning Application Ref AB/36/18/PL

Further to our objections to the above development, I write to inform you of the following matters which have recently come to my attention and which I would be grateful if you would take into account in your recommendation to the Development Control Committee where presumably the application will be heard either at the special development control meeting on 24 October 2018 or 14 November 2018 – could you confirm which one?

The Town Council is currently undergoing a review of its Neighbourhood Plan and hopes that the pre-submission will be available the Reg 14 formal consultation during January/February of next year. There has been extensive informal consultation and focus group discussions emerging from this and the outcome has been to have policy for the Blastreat and Greenhurst sites redrafted. I shall be forwarding shortly the draft amended policy that will go forward into the review once this has been adopted by the Town Council on 8 November 2018. Given that we are now advanced in the Neighbourhood Plan process, I would be grateful if you would take the amended policy into account as a material consideration.

As I expect you know sites AB10 and RU7 (Greenhurst and Blastreat respectively) are identified in the HELAA and have been taken into account in terms of ADC's housing land supply. As well as the sites already identified in the HELAA another 1250 dwellings will need to be sourced from Parish and Town Councils in the District. Accordingly, in addition to the sites identified in the adopted Neighbourhood Plan, the Town Council is obliged to find further sites for a number of housing yet to be confirmed in its Review.

The development proposed by Renaissance specifically describes the proposal as “sheltered apartments for the elderly” and it is on this basis that ADC’s Development Control Committee will have to determine the application. Yet on 28 September 2018, Kevin Owen (ADC’s Planning Policy Team Leader) wrote to all Parish/Town Clerks informing them that:

“Nursing homes/extra care or sheltered housing: such developments do not count towards the suggested housing distribution target for your Parish area. The methodology for calculation Objectively Assessed Housing Need (OAN) via the Strategic Housing Market Assessment for the adopted Arun local Plan does not include use class C2 (residential institutions) housing (Development Management Procedure Order 2015) categories of demand as component of need. The housing supply from this category therefore, cannot be counted without the OAN calculation of need also having to be increased to project this component of demand and this is clearly outside the scope of the Adopted Local Plan and Non-Strategic Sites DPD.”

Thus, not only is this development contrary to the provisions of part of the Development Plan but such units would not count towards the housing supply already identified for Arundel in its adopted Neighbourhood Plan and would more importantly undermine ADC’s own housing numbers. This situation adds further weight to the Town Council’s objections and, if recommended for approval, will be included in the case for the application to be “called in” by the Secretary of State.

I look forward to hearing from you

Kind regards



Sue Simpson
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