

PLANNING STATEMENT

LAND AT WINGS NURSERY, LIDSEY ROAD, WOODGATE



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Revision: 2

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I. Introduction

I.1 WHALEBACK has been instructed by the applicant to prepare and submit and outline planning application for the construction of 55 residential dwellings on land south west of the Woodgate Crossing, on the A29 in Woodgate, within the larger settlement of Westergate. The site is within the Parish of Aldingbourne and Barnham Ward, within Arun District.

I.2 This Planning Statement should be read in conjunction with all other planning application documents including illustrative drawings and surveys. The application is supported by the following documentation:

- Application Forms
- Validation Checklist
- Biodiversity Checklist
- Design and Access Statement
- Landscaping Strategy (Within D&A Statement)
- Lighting Assessment (Within D&A Statement)
- Noise/Extraction Assessment (Within D&A Statement)
- Bin Storage & Collection Provision (Within D&A Statement)
- Affordable Housing Statement
- Flood Risk Assessment
- Foul & Surface Water Drainage Statement
- Lidsey Foul Water Environmental Assessment Statement
- Biodiversity Surveys and Reports
- Residential Travel Plan
- Transport Assessment
- Tree Survey & Arboricultural Report

I.3 This Planning Statement introduces the site and surroundings and summarises the proposed outline planning application for development with reference to indicative site layout plans and supporting documentation. The principle of development and access onto the site are proposed in detail with all other matters reserved for a subsequent full planning application.

I.4 Relevant planning history relating to this site and similar development nearby is referred to and discussed.

I.5 Relevant policies from the adopted and emerging local development plan and NPPF are set out as well as other planning policy documents. A review of the chronology of the Aldingbourne Neighbourhood Plan is provided to illuminate the historic support for the application site by the local community. A summary of the five year supply position of the District Council is also provided.

I.6 Finally, the merits of the proposed development are set out and discussed.

2. Site and Surroundings

2.1 The application site is a redundant former nursery (Wings Nursery) to the west of Lidsey Road (A29) south of the Woodgate Railway Crossing. The site is flat and open, measuring 2.6 hectares. The land is parts has an untidy appearance with dilapidated glasshouses, hardstanding, farming machinery, signage and bramble growth. It has a frontage of 185m with the A29, interrupted at its mid-point by a large detached dwelling, 'Wings', which is excluded from the site area.

2.2 The site lies at the edge of the settlement of Woodgate, at the southern end of the village of Westergate in Aldingbourne Parish, home to 1,420 households. Eastergate and Barnham are to the north and east of the site. The villages of Lidsey and Shripney are 0.7 miles to the south with Bognor Regis four miles beyond. The boundary of the South Downs National Park follows the A27, two miles to the north at Fontwell. Chichester is seven miles to the west by road.

2.3 There are currently three vehicular access points directly onto the site from the Lidsey Road, each with a field gate, dropped-kerb and hardstanding. 'Wings' itself has a separate vehicular access. Pedestrian pavement is in place along the length of the site boundary with Lidsey Road providing a safe and convenient walking route to the rest of the village. The A29 is a reasonably busy road connecting Bognor Regis to the A27 at Fontwell. It is the subject of a major infrastructure improvement project associated with a strategic development of 2,300 homes, known as 'BEW' (Barnham-Eastergate-Westergate) pending allocation in the Arun Local Plan.



Site area outlined in red

2.4 Residential development is found on three sides of the site. Opposite to the east is a row of houses (numbers 1 to 14 Lidsey Road) extending the length of the site frontage; to the south are further houses along the boundary (Stockhearn House and The Cottage) with more extending south along Lidsey Road and to the west and rear of the site are further dwellings and buildings associated with Woodgate and Lidsey Nurseries. To the north is a small paddock with the Prince of Wales public house immediate beyond. The nearby housing is a mix of older semi-detached bungalows and newer two-storey houses across Lidsey Road, with more sporadic, larger detached houses found around the other boundaries.

2.5 The Southern mainline railway between Worthing and Chichester bisects Westergate with a level crossing, known as Woodgate Crossing, immediately to the north of the site. The nearest train station is Barnham, 2.5 miles to the east.

2.6 There are no planning designations or protected constraints on or adjacent to the site. There is an overgrown drainage ditch along part of the eastern boundary. The site boundary includes deciduous trees and other vegetation around most sides with a fine oak tree in the centre of the site which is to be retained within the proposed development. The house at 'Wings' has a dense evergreen screen on its boundary.

2.7 The historic village of Westergate extends in a linear form on each side of the A29, with modern development in a series of residential closes and cul-de-sacs intersecting the properties fronting the main road which have evolved as the village has grown. There is considerable construction activity seen in the immediate vicinity of Woodgate with new houses under construction at Gatehouse Mews across Lidsey Road to the northeast of the application site and the larger cul-de-sac of 'The Pines' further to the north along Lidsey Road. The modern Oak Tree Lane estate opposite the application site is now becoming well established. The accompanying Design and Access Statement expands upon the clear pattern of growth that has created a consistent character of older properties fronting Lidsey Road and newer infill development visible between and behind as well as the built form of the settlement and individual buildings within it. This consistent character provides a strong sense of place along the high street and gives a vibrant albeit mixed appearance.

2.8 Community facilities and services are available in several convenience stores, a post office, a primary school, a public house, a sports centre and recreation ground, a church and a petrol station. The closest convenience store and post office is 200m or 2 minutes walk to the north of the site. Aldingbourne Primary School is within 4 minutes walk from the northern entrance to the site at 420m and the Ormiston Six Villages Academy secondary school in northeast Westergate is less than 1 mile away by footpath, a short cycle or reasonable walking distance for students.

2.9 The Prince of Wales public house is located at the northeast corner of the site providing the nearest social facility. Although the public play spaces in the village are located slightly further away to the north, the application site is proposed to include its own play space which will fulfil this need in the Woodgate area.

2.10 Westergate is served by 2 bus routes, numbers 66 and 85; there are bus stops for the 66 service immediately outside the site entrance, heading north and south.



Existing centre-point access into site – proposed to be the main access point onto Lidsey Road.



Existing northern access into site (with field gate) – proposed to be the secondary access point.



Bus Stop adjacent to site access.



Part of the well-screened eastern / frontage boundary of site with Lidsey Road / A29



Housing opposite the site across Lydney Road / A29 to the east



View within site from north to south



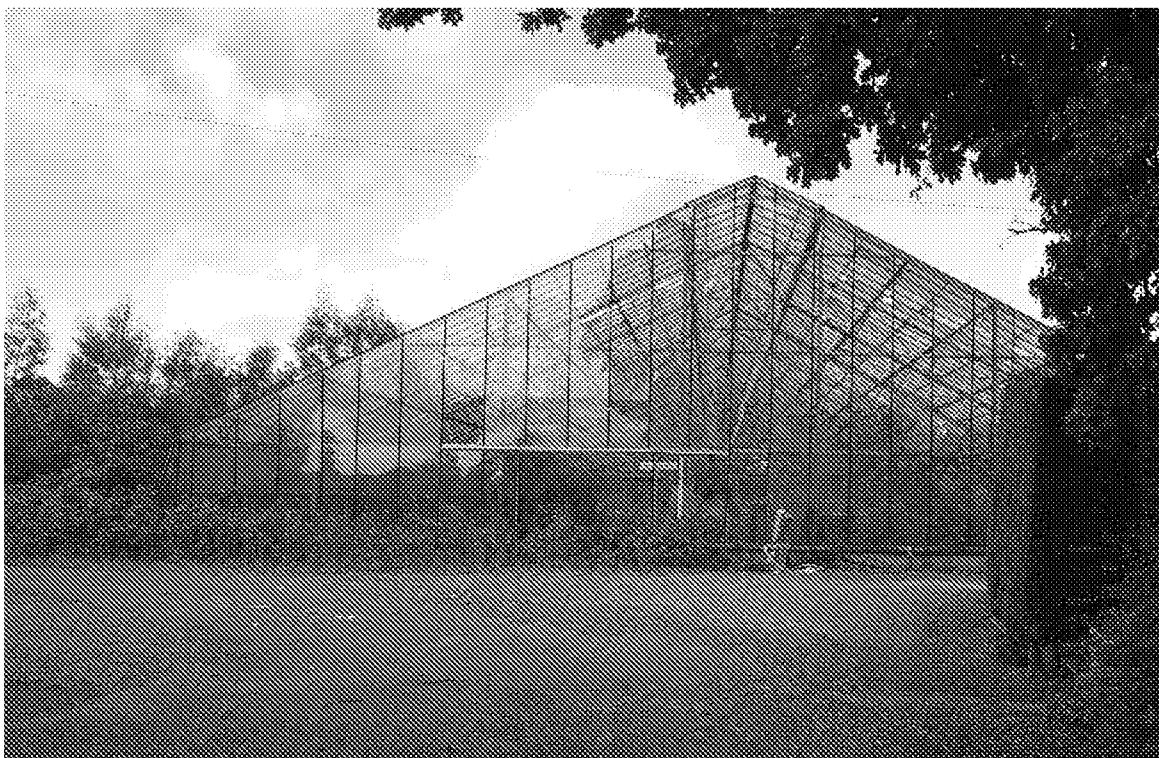
View within site from south to north



South area within the site with redundant glasshouses, farm machinery, signage and hardstanding



Western boundary as viewed from within the site



Glass houses beyond the site boundary to the west



Southern boundary as viewed from within the site showing existing development to the south



A good quality oak tree in the centre of the site (to be retained within the proposed development)



Prince of Wales pub, adjacent to the northeast corner of the site



Convenience store and post office, 200m or 2 minutes walk to the north of the site



Recent development in Westergate



Recent development in Woodgate to the south of the crossing

3. Development Proposal

3.1 The application seeks outline planning consent for the construction of 55 residential dwellings on land at Lidsey Road, south west of Woodgate Crossing. All matters are to be reserved except for the means of access into the site which is to be considered as part of this application. Detailed consideration of site layout, design, parking, open space, landscaping etc. are therefore reserved for a subsequent full planning application.

3.2 The proposed development as described on the application form is:
“Outline application for the erection of 55 dwellings, sustainable drainage measures, public open space, children’s play area, landscaping and all other associated works (means of access onto the site to be considered, all other matters to be reserved).”

3.3 An illustrative site layout plan has been submitted alongside the application to demonstrate that the site can accommodate 55 residential units with associated sustainable drainage measures, open space, car parking and children’s play areas and internal circulation routes. This equates to a gross development density of 21.15 dwellings per hectare (net density 30.22 dph).

3.4 The final mix of dwellings will be determined alongside the other reserved matters through a subsequent full planning application but an indicative mix is provided (as shown on the illustrative site layout plan):

37 Private Homes, of which:

- 13 x 3 Bedroom Houses
- 18 x 2 Bedroom Houses (including 6 Bungalows).
- 4 x 2 Bed Flats
- 2 x 1 Bed Flat

18 Affordable Homes, of which:

- 15 x 2 Bedroom houses
- 2 x 2 Bed Flats
- 1 x 1 Bed Flat

3.5 The proposed size mix across all units are as follows:

- 13 x 3 Bedroom units: 24%
- 39 x 2 Bedroom units: 71%
- 3 x 1 Bedroom units: 5%

3.6 33% of new dwellings will be provided as affordable housing (18 units). Please see the accompanying Affordable Housing Statement for further information about these.

3.7 The indicative housing mix would provide 46 houses (84% of total) and 9 flats (16% of total). The Parish Community Profile (AirS 2012) found that the existing parish has 80% houses and 20% flats which would be a balance supported by this application.

3.8 Detailed supporting information about the means of vehicular and pedestrian access into the site is provided in the accompanying Transport Statement prepared by Russell Giles Partnership Ltd, alongside a Residential Travel Plan to encourage future residents to use sustainable modes of transport. The site as existing benefits from three formalised access points directly onto Lidsey Road, one at the northernmost boundary with the road, one immediately to the south of Wings and one at the southernmost boundary with the road. The house at 'Wings' will retain its own residential access. The development will utilise the existing access point immediately to the south of Wings to serve the majority of new homes with four houses served separately by the existing northeast access.

3.9 The illustrative site layout plan indicates the ability to provide a large public open space (approx. 0.25 hectares) in the centre of the site with the specimen oak tree as its focal point. It includes sustainable drainage measures in the form of a balancing pond in the public open space and swales along the road frontage, providing both a biodiverse habitat and attractive public realm. A small-scale structure could also be provided in the form of a pergola/ bandstand or children's play equipment subject to the council's advice at subsequent full planning application stage. Landscaping, footpaths and family-sized gardens are proposed throughout the site as well as locally characteristic, indigenous hedge screening along the boundary with the A29.

Community Consultation Event

3.10 A community consultation event was held at the Westergate Methodist Church Hall on the 19th July 2017 between 3pm and 7.30pm. All adjacent and opposite neighbours were invited by hand-delivered letter and given notes on how to respond to the consultation.

3.11 The event was attended by 32 local residents and generated much discussion with 2 follow-up written responses.

3.12 Most residents present were positive about the open feel of the layout, the low density and the retention of trees shown on the indicative drawings. The suggestions of involving a Community Land Trust (CLT) to ensure affordable housing was made available for local people was also positively received.

3.13 Comments of concerns mostly related to traffic impacts on the A29. Neighbouring residents to the south of the site asked for the heights of properties on the southern boundary to be reduced; the applicant has agreed in principle to position only bungalows along the southern boundary which will be confirmed through the subsequent full planning application.

3.14 The indicative plans proposed through this application have taken into account the comments arising from this community consultation event.

4. Relevant Planning History

4.1 This section outlines the relevant planning history relating to this site and similar development nearby is referred to and discussed. It includes planning application decisions as well as informal assessments in the form of Pre-Application Advice and the Council's HELAA document.

4.2 There are numerous historic planning permissions relating to the horticultural use of the site as a nursery including glasshouses and dwellings associated with that use which will not be reviewed here as they are not relevant to the consideration of the current application.

Pre-application written advice

4.3 Two pre-application enquiries have been registered with Arun District Council planning officers.

4.4 February 2014: PAA/137/13/: Change of use of existing Wings Nursery garden nursery to a Static Caravan Park with associated landscaping works. This received a positive response.

4.5 July 2016: PAA/90/16/: A change of use application for the development of 50 to 60 residential units. The new properties could be a mixture of housing types including starter homes, affordable units, family homes and bungalows.

4.6 It should be noted that this pre-application response in July 2016 pre-dated the HELAA assessment of the land which was published in November 2016 (see below).

4.7 The planning officer's pre-application response found the principle of development to be unacceptable given its location outside of the built-up-area boundary, but confirmed that this would have only limited weight due to the Council being unable to demonstrate a five year housing land supply and that the primary consideration therefore fell on whether any adverse impacts of granting permission in would significantly and demonstrably outweigh the benefits.

4.8 The focus of the response therefore fell on the sustainability of the site as a location of housing. The officer's letter concluded with the following comments:

"The proposed development would be in an unsustainable location and would not provide development sufficiently accessible to local services, which would encourage travel by car, impacting adversely on the use of natural resources and the need to adapt to climate change.

The applicant should bear in mind that the sustainability of the site may improve if the proposed Barnham/ Eastergate/Westergate allocation is brought forward for development (as outlined in Policy H SPI of the Arun Local Plan Publication Version (2014)). The proposed allocation would mean that community, health, education and retail facilities would be provided at a new local centre, which, depending on where it is located in relation to the Wings Nursery site, may have the potential to improve the sustainability of the Wings Nursery site as a location for housing."

4.9 Since the receipt of this pre-application response in July 2016, the Council's five year supply position has worsened and emerging planning policies have evolved. This Planning Statement makes the case that

not only is this site a sustainable location for housing, being well located in relation to a large village and well served by sustainable transport means commensurate to a semi-rural location, but also that the emerging development plan will likely depend on this site alongside many other rural locations to deliver the Council's housing strategy.

4.10 Finally, the proposed strategic location of Barnham/ Eastergate/ Westergate has since been included in the Arun Local Plan Main Modifications document as a formal allocation lending more weight to the officer's comments that the application site may be considered more favourably.

Housing & Economic Land Availability Assessments (November 2016)

4.11 The Council's Housing & Economic Land Availability Assessment (HELAA) is one of several technical reports that the Council is required to produce to underpin the emerging Local Plan. It is a technical assessment of sites which could potentially contribute towards the future supply of housing and employment land within the District. The HELAA does not set policy, but provides background evidence on the potential availability of sites.

4.12 The Wings Nursery application site is identified within the HELAA as Site Reference 32. Site 32 is assessed as 'Developable' across 1.82ha (net) at a density of 30dph indicating a total yield of 55 units within the 2021-2023 timescale. However, because this HELAA was based in 2016 and is already now 1 year out of date, the 2021 year falls within the 5 years of the current date and therefore would be considered 'deliverable' within the five-year housing land supply, should the HELAA be updated to today's date in 2017.

Selected relevant planning application decisions

4.13 This section outlines some relevant planning application decisions relating to land near to the application site.

Site: Land east of Fontwell Avenue, Fontwell, West Sussex, BN18 0SB
Description: Outline application with some matters reserved to provide up to 400 No. new dwellings, up to 500 sqm of non-residential floorspace (A1, A2, A3, D1 and/or D2), 5000 sqm of light industrial floorspace (B1 (b)/(c)) & associated works including access, internal road network, highway works, landscaping, selected tree removal, informal & formal open space & play areas, pedestrian & cyclist infrastructure utilities, drainage infrastructure, car & cycle parking & waste storage. This application is a departure from the Development Plan & also lies within the parish of Eastergate.
Application: WA/22/15/OUT: Refused
Appeal: APP/C3810/V/16/3143095: Allowed
Called-in by Secretary of State for DCLG: Upheld (July 2017)
Key points: - The Council's housing land supply position can only deliver 1.92 years against the requisite five year supply. - Only limited weight can be attached to the emerging Local Plan and saved Local Plan policies. - No argument of prematurity against the emerging Local Plan can be upheld because the appeal site of 400 dwellings is not significant compared to a plan period requirement of 18,000 homes.

Site: Land west of Westergate Street East of Hook Lane
Description: Outline application for 79 dwellings, public open space, children's play areas etc.
Application: AL/39/13: Refused
Appeal: APP/C3810/A/14/2220943: Allowed
Key points: - Found to be a sustainable location fitting in with general vision for local area in emerging development plan. - Lack of 5 year supply. - Benefit of affordable housing

Site: Land at Nyton Road and Northfields Lane and Land off of Fontwell Avenue
Description: Residential development of up to 268 dwellings including 30% affordable housing (incorporating 60 Senior living units) with associated access, public open space and landscaping.
Application: AL/61/13: Refused
Appeal: APP/C3810/A/14/2217385: Allowed
Key points: - Housing supply policies in the saved Local Plan are out of date. - Greenfield land is necessary to meet the future housing requirements within Arun and the visual harm would be localised. - Flooding risk can be minimised. - Lack of 5 year supply and requirement figure should include a 20% buffer for persistent under-delivery.

Site: Land at Woodgate Centre
Description: Outline application for 2.85 hectares of residential development (up to 60 open market dwellings, and up to 25 affordable dwellings (30 %), 2.9 hectares of public open space, and 0.2 hectares for community service.
Application: AL/106/12: Refused
Appeal: APP/C3810/A/13/2196029: Dismissed
Key points: - Unsustainable location, although this specific site has only limited comparability to the application site as it is in a very different landscape area, is much larger in area and further from the A29.

4.14 Consistent conclusions drawn from the above Planning Inspectors' and Secretary of State's findings are that:

- the Council cannot demonstrate a five year housing land supply and so policies related to the control and supply of housing are to be considered out of date;
- greenfield land is necessary to meet the future housing requirements within Arun and the visual harm would be localised; and
- Westergate can be considered a sustainable location but the specific location of the site in relation to facilities and services as well as its position within specific landscape character areas are critical to the assessment of sustainability.

5. Planning Policy Framework

5.1 Planning and Compulsory Purchase Act 2004 Section 38(6) requires local planning authorities to determine planning applications in accordance with the development plan, unless other material considerations indicate otherwise.

5.2 The Development Plan of Arun District Council in the area relevant to the application site currently consists of the following adopted plans:

- National Planning Policy Framework (2012)
- Arun District Local Plan – saved policies (2003)
- West Sussex Minerals Local Plan – saved policies (2003)
- West Sussex Waste Local Plan (2014)
- Aldingbourne Neighbourhood Development Plan (2016)

5.3 The emerging Arun Local Plan 2011-2031 is not yet adopted and can be afforded limited weight but will also be addressed in this Planning Statement as required.

National Planning Policy Framework (2012)

5.4 The “golden thread” running through both plan-making and decision-taking policies in the NPPF is the presumption in favour of sustainable development. For decision taking this means approving development proposals that accord with the development plan without delay, and where the development plan is absent, silent or relevant policies are out of date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF as a whole, or policies within the NPPF which indicate development should be restricted (paragraph 14).

5.5 There are three dimensions to sustainable development: economic, social and environment, which should not be taken in isolation because they are mutually dependant. Generally, if the presumption in favour of sustainable development is triggered, all other policies of the Framework will still apply.

5.6 Paragraph 47 seeks “to boost significantly the supply of housing”. In doing so, local planning authorities are required to use their evidence base to meet the full Objectively Assessed Need (OAN) for market and affordable housing in the housing market area, as far as it is consistent with the policies set out in the Framework. It goes further, requiring authorities not just to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing, but for all LPAs to additionally provide a further buffer of 5% (moved forward from later in the plan period) to ensure choice and competition on the market. This buffer increases to 20% where local authority has a record of persistent under delivery of housing which is the case in Arun.

5.7 Paragraph 49 states that “Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the LPA cannot demonstrate a 5-year supply of deliverable housing sites”. In these circumstances, paragraph 14 of the Framework is engaged and significant weight must be afforded to the pressing need to boost housing supply.

5.8 Paragraph 198 of the Framework states that “where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted. However, the National Planning Policy Guidance (paragraph 41-083) expands upon this in light of a written ministerial statement of December 2016 that set out where a recently adopted neighbourhood plan is in place, policies must be considered up-to-date if the Council can demonstrate a 3-year housing land supply against its five-year requirement. This test cannot be met in Arun as only a 1.92 year supply can be demonstrated and so regrettably the Neighbourhood Development Plan policies, as well as the Local Plan policies, in so far as they relate to the supply of housing, must be considered out of date and the application must be determined on its merits.

Arun District Local Plan – saved policies (2003)

5.9 The Planning and Compulsory Purchase Act 2004, contained a provision for the saving of policies in adopted or approved local and structure plans for a period of three years from the commencement date of the Act, which was 28th September 2004. Policies in these plans expired on 27th September 2007, unless the Secretary of State agreed to their extension beyond that date. The Secretary of State has granted consent for certain policies within the Arun District Local Plan to be saved under the provisions of the Act. Only saved and relevant policies are addressed in this Statement.

5.10 The 2003 Local Plan is now dated but has not yet been replaced by the emerging Local Plan. Two policies in particular (GEN2 and GEN3) which relate to the supply of housing have repeatedly been found to be out of date by appeal inspectors on the basis that the local planning authority has been unable to demonstrate a five year housing land supply; the policies therefore only attract limited weight in this respect.

5.11 Relevant policies from the Arun Local Plan (2003) include:

Policy GEN2 – ‘Built-up Area Boundary’. This policy directs new development to locations within built up area boundaries. Outside of these boundaries, the policy indicates development will not be permitted unless it is consistent with other policies within the Local Plan. In the absence of a five-year supply of housing land, Policy GEN2 is considered to be out-of-date under the tests of the Framework and as confirmed by several recent appeal inspectors.

Policy GEN3 – ‘Protection of the Countryside’. This policy sets out the nature of development that would be acceptable outside of the built-up area boundaries. In the absence of a five-year supply of housing land, Policy GEN3 is considered to be out-of-date under the tests of the Framework and as confirmed by several recent appeal inspectors.

Policy GEN7 – ‘The Form of New Development’. This policy requires all new development to incorporate high quality design in appearance and layout and achieve a net density of at least 30 dwelling per hectare. This outline planning application proposes a development of 30 dwellings per hectare in an indicative layout that has been consulted upon with the local community. Further detail and justification of the design approach will follow in a subsequent full planning application in accordance with this policy.

Policy GEN8 – ‘Development and the Production of New Infrastructure’. This policy requires supporting infrastructure to be in place to serve new development. On-site access, open space, ecological and refuse

infrastructure is demonstrated in this application and indicative layout plan; a section 106 obligation will also be signed to ensure requisite payments are made to local infrastructure in support of this application.

Policy GEN9 – ‘Foul and Surface Water Drainage’. This policy resists development which will materially increase foul and/or surface water discharges. This application is supported by a Flood Risk Assessment and Foul and Surface Water Drainage Statement.

Policy GEN12 – ‘Parking in New Development’. This policy refers to the Council’s requirements for parking in new development and states that parking in excess of the standards will not be allowed. This application is supported by a Transport Assessment which confirms the West Sussex County Council Residential Parking Demand Calculator would indicate a total demand of 115 spaces; the indicative application proposes 110 spaces – within the allowable limit in compliance with GEN12.

Policy GEN15 – ‘Cycling and Walking’. This policy requires new development to provide safe and attractive facilities for cyclists and pedestrians both within the site and through links to the surrounding area. This application is supported by a Transport Assessment which includes extensive reference to the provision of footways and cycle ways within the site and connectivity to surrounding pedestrian and cycling infrastructure both in the immediate vicinity and wider area. It is also demonstrated that cycle parking can be provided in safe and convenient locations associated with each new dwelling to ensure sustainable transport choices are attractive for future residents.

Policy GEN20 – ‘Provision of Public Open Space within New Development’. This policy requires new development to deliver public open space to a ratio of 2.4 hectares per 1,000 people and play equipment to meet the needs of the development. The indicative layout plan for this application demonstrates the provision of approximately 0.25 hectares of public open space (which could include play equipment to be secured through a Section 106 obligation) to serve the 55 new dwellings and wider area.

Policy DEV17 – ‘Affordable Housing’ (as amended). This policy seeks the provision of 30% of new dwellings within schemes of 15 units or more to be affordable. This application proposes 33% of new homes to be affordable, in compliance with this policy.

Aldingbourne Neighbourhood Development Plan (2014-2034) (adopted 2016)

5.12 Aldingbourne Neighbourhood Development Plan with post-examination modifications was published in September 2016, passed referendum on 18th October 2016 and was brought into force by Arun District Council resolution on 9th November 2016.

5.13 This outline planning application includes only the detailed design of access with all other matters reserved. Several Neighbourhood Development Plan policies relating to detailed matters of design etc. are therefore not discussed in this list; those policies below are relevant to the consideration of this outline planning application:

Policy HI – ‘Quality of Design’. Similar to Local Plan policy GEN7 requiring high quality design that reflects local character and distinctiveness. Detailed design proposals will be included within the subsequent full planning application. The general design philosophy is described within the Design & Access Statement.

Policy H2 – ‘Housing Mix’. New housing must deliver a range of housing types, sizes and tenures including 25% to meet Lifetime Homes Standards. The specific housing mix and standards will be confirmed in the subsequent full planning application but the indicative housing mix proposed (24% 3-Bedroom units, 71% 2-Bedroom units and 5% 1-Bedroom units) as well as the ratio of houses to flats (approximately 80:20) carefully reflects the local characteristics identified in the Neighbourhood Plan and Parish Community Profile (AirS 2012).

Policy H3 – ‘Housing Density’. This policy simply requires an appropriate density on each site. This outline application proposes 30dph which is consistent with the Local Plan Policy GEN7.

Policy H4 – ‘Affordable Housing’. This policy states that any proposal for 10 or more new dwellings should include 40% affordable units, unless this can be demonstrated to make the scheme unviable. The size and tenure of affordable units should reflect latest available housing needs evidence. This outline application proposes 33% affordable housing which exceeds the requirement of Local Plan Policy DEV7 as well as the District Council’s latest affordable housing requirements. It is unclear how the two conflicting policies are to be balanced but the provision of 33% affordable housing is presented as a mid-position between the two differing requirements.

Policy H6 – ‘Windfall Sites’. This policy sets criteria for unallocated sites coming forward for housing. Further detail will be provided in compliance with these criteria in the subsequent full planning application.

Policy H8 – ‘Outdoor Space’. All new dwellings must include an outdoor amenity space of adequate size and quality, either as a private garden or shared amenity area. The indicative layout plan shows that all houses have family-sized gardens as well as the provision of 0.25 hectare of public open space within the site.

Policy EH1 – ‘Built Up Area Boundary (BUAB)’. In the absence of a five-year supply of housing land (or a 3-year supply as referred to in the NPPG paragraph 41-083), Policy EH1 is considered to be out-of-date under the tests of the Framework and as confirmed by several recent appeal inspectors.

Policy GA1 – ‘Promoting sustainable movement’. This policy supports proposals that are well-located to public transport and can improve the accessibility by contributing to enhanced services. The accompanying Transport Statement in support of this application sets out the connectivity of the site to surrounding footways and cycleways and financial contributions to other services will be secured through a Section 106 obligation.

Policy GA3 – ‘Parking and new development’. Similar to Local Plan Policy GEN12. Proposals must provide adequate parking in accordance with the standards adopted at the time.

Chronology of the Neighbourhood Development Plan relating to the application site

5.14 The Pre-Submission Neighbourhood Development Plan (November 2014) included an allocation of 30 homes at the Wings Nursery site. The Parish Council had undertaken a Parish Survey of residents including three options to deliver 30 new homes as required by the emerging Arun Local Plan:

Option A – Land north of A29/Nyton Road roundabout

Option B - Land South west of Woodgate Crossing for up to 30 houses

Option C – Same as Option B combined with start up business units located off site further to the south west.

5.15 The Survey Results supported Option C and the Pre-Submission NDP therefore proposed to allocate up to 30 homes and start up business units at the Wings Nursery:

Pre-Submission NDP Policy H5 Housing Site Allocation

Permission will be granted, within the Plan period, for 30 new homes and a community orchard on land identified on the Proposals Map. A target of 40% affordable housing provision will be sought under this policy unless exceptional circumstances can be demonstrated. Proposals which provide a higher level of affordable housing will be considered preferable.

H5.1 The parish has to provide 30 homes to meet the allocation set down in the emerging Arun DC Local Plan and the Housing Needs Survey identified a local requirement for homes. Consultation with residents has supported an allocation of 30 homes on this site. The site is situated outside of the BUA boundary but is brownfield being a disused nursery site. There are no suitable locations inside the BUA.

5.16 After the consultation on the Pre-Submission NDP closed, two strategic sites outside the built up area of Westergate were granted permission on appeal, contrary to the emerging Neighbourhood Development Plan. This caused uncertainty about the future of the NDP as one of its main purposes was to control the scale and location of new development coming forward, but the appeal schemes far exceeded the total number of units required in the area.

5.17 The Parish Council therefore resolved to write to the community in April 2015 to ask if it still supported an allocation at the Wings Nursery site for 30 new homes.

5.18 The response informed the Submission NDP which retained the allocation of 30 homes at the Wings Nursery with a caveat that homes should be for local needs only:

Submission NDP Policy H5 Housing Site Allocation

Permission will be granted, within the Plan period, for 30 new homes and a Community Orchard/ Allotments on land identified on the Proposals Map. A target of 40% affordable housing provision will be sought under this policy unless exceptional circumstances can be demonstrated. Proposals which provide a higher level of affordable housing will be considered preferable.

H5.1 The parish was given an allocation to provide 30 homes in the emerging Arun DC Local Plan. The parish Housing Needs Survey identified a local requirement for homes. During the final stages of making the Plan, a Planning Inspector allowed appeals on land not identified by the residents for housing. Despite local anger at the

decisions, which were made even though the Inspector was made aware of the emerging Plan, residents have voted to continue to support an allocation of 30 homes on this site. The site is situated outside of the BUA boundary but is brownfield being a disused nursery site. There are no suitable locations inside the BUA. (see Housing Site Appraisals in Evidence Base). Residents have voted specifically for housing for local needs and if this is not permitted wish the land allocation to be withdrawn from housing use and returned to agricultural land use, the housing allocation having been met by the appeal sites.

5.19 The Submission Neighbourhood Development Plan was submitted for Examination in early 2015 but rejected by the Examiner, Sheila Holden, in September 2015. In her report, the Examiner found no intrinsic reason why the site allocation of Policy H5 was unsuitable, undeliverable or unsustainable. However, she did raise several technical concerns about the policy wording, including why the allocation of 30 homes was substantially lower than the site capacity indicated by the Evidence Base, lack of clarity in the consultation process, insufficient evidence for certain policy objectives and the uncertainty caused by the various policy caveats.

5.20 Firstly, the Examiner drew attention to the 2012 SHLAA assessment (now superseded) that estimated 72 houses would be deliverable which is substantially above the allocation of 30 homes in the policy wording, suggesting an inefficient use of the land. Secondly, the Examiner was concerned about the clarity of the public consultation that led to community support for the allocation in Policy H5; despite a total number of 30 houses being stated in the consultation, the site boundary had not been clearly identified in the earlier version which may have misled respondents about the extent of the land being allocated. There was also insufficient evidence to support the policy requirements for a community orchard and to restrict occupancy of the new housing to local people only. Finally, the caveat inserted by the Parish Council, that the allocation may be withdrawn if the site does not address local needs, fails the principle within the NPPF that policy should provide certainty for developers.

5.21 The Examiner summarises the technical conflict at paragraphs 8.74-76 of the report: *“If the site as a whole were to be allocated for housing it would need to refer to an allocation of at least 30 homes, and it could set down a target of 40% of them to be affordable. However, the site proposed would appear to be capable of accommodating significantly more than 30 homes and is therefore too large for the purpose for which it is to be allocated.”*

The supporting text goes on to suggest that if the site does not address local housing needs, the allocation of the site would be withdrawn: *“whilst this may appear to be an understandable approach by the local community, it is contrary to the Framework’s advice to provide certainty for developers. ... I am left with no choice but to conclude that the allocation would not meet the basic conditions. I therefore recommend that the policy should be deleted.”*

5.22 Following the Examiner’s rejection of the first Submission NDP, the Parish Council took into account most of the Examiner’s recommendations and amended or deleted policies accordingly. The second Submission NDP was submitted for examination in early 2016 without the housing allocation Policy H5. The second Examiner, John Slater, published his report in support of the plan in August 2016 and the Adopted NDP came into force in November 2016.

5.23 It is evident from the above chronology that throughout the examination process, the merits of the site were never questioned, only the way in which it was allocated in the emerging policy wording.

Arun Local Plan – Main Modifications (Submission) March 2017

5.24 The emerging Local Plan will cover the whole of Arun District except the area within the South Downs National Park.

5.25 The first examination of the Adur District Local Plan 2011-2031, submitted in January 2015, was formally suspended in February 2016 following a letter from two Planning Inspectors confirming that additional work was required. The letter concluded that the council needed to find more housing including some to meet the need of neighbouring authorities within the Housing Market Area.

5.26 Following work to update the evidence base and draft policies, the Main Modifications Local Plan and evidence base was consulted upon between April and May 2017. The Examination will resume in late September 2017 with adoption anticipated for Winter 2017.

5.27 The weight to be attributed to emerging plans is mentioned in paragraph 216 of the Framework. The Local Plan is now in its final stages of preparation prior to Examination and ordinarily some weight could be attributed to a plan at this stage. However, it has not yet been tested at Examination and clearly several parts of the housing delivery strategy still contain significant areas of uncertainty, especially in terms of the as-yet-unidentified non-strategic housing supply component of 1,250 and whether or not a stepped trajectory is appropriate. Because of these areas of significant risk to the Council's housing delivery strategy and potential inability to adopt a sound local plan if a first-five year supply cannot be demonstrated, it is considered that the draft policies contained therein can be given no more than limited weight.

5.28 Notwithstanding this limited weight, it is proposed that the current application does not conflict in principle with the relevant policies of the emerging Local Plan as it acknowledges the need for greenfield development on suitable sites to meet housing requirements to 2031. Furthermore the plan acknowledges the suitability of Westergate and Aldingbourne generally as a location for development by proposing a new strategic allocation of 3,000 homes (2,300 within the plan period) immediately to the east of the site in the strategic allocation of Barnham/Eastergate/Westergate as well as the delivery of 1,250 homes on unallocated non-strategic sites within the rural areas of Arun District, of which the application site is identified as a suitable constituent of this in the HELAA.

5.29 The Council has sought to plan for additional housing to meet the needs of neighbouring authorities who cannot meeting their needs (Chichester and Worthing) who share a local Housing Market Area under the 'duty to cooperate'. The planned housing for the District is therefore 20,000 units over the emerging plan period, equivalent to 1,000 homes per annum, 81 homes per annum (1,620 total) over the objectively assessed need of 919 dpa.

5.30 The emerging plan-period supply figures are set out below.

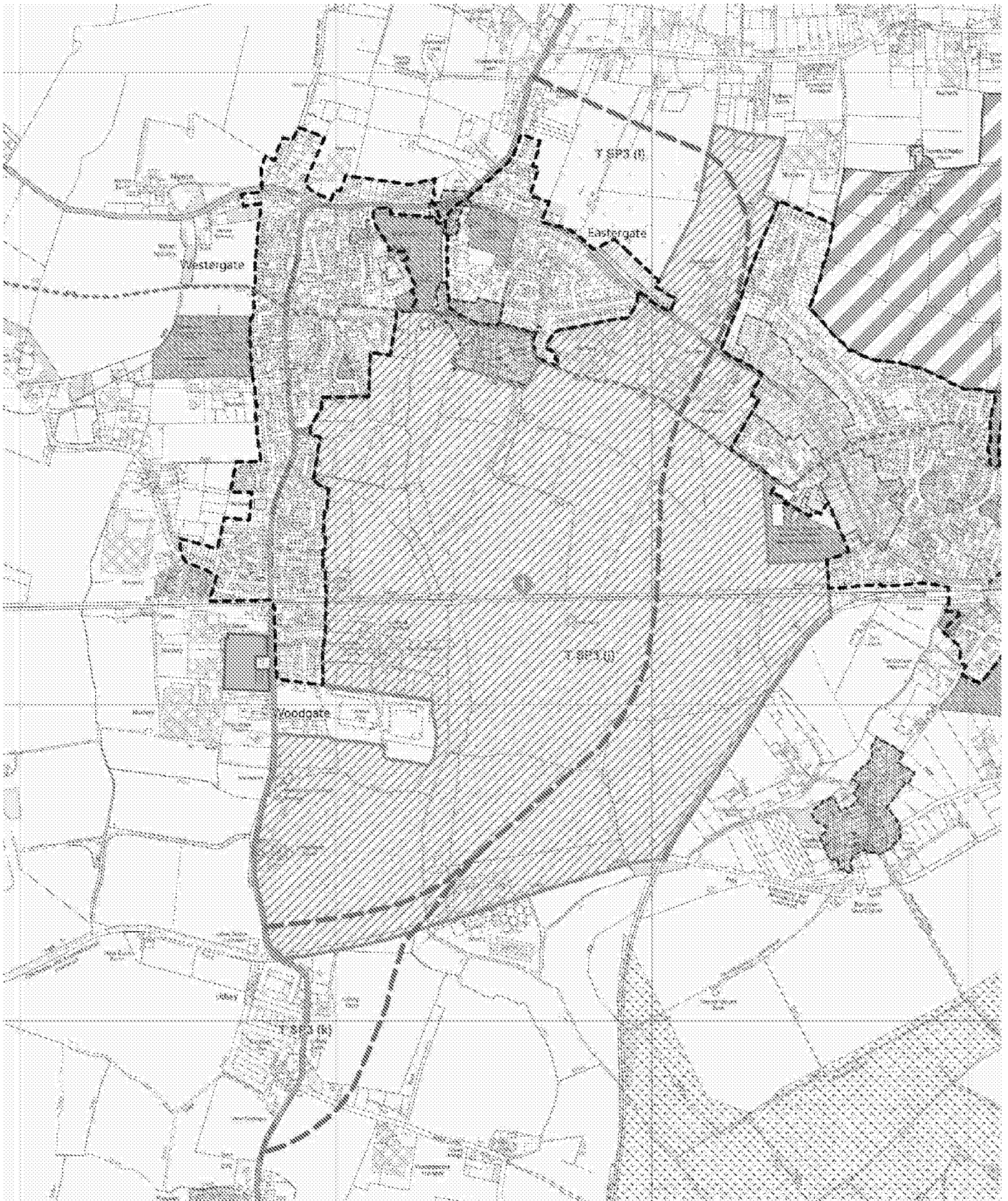
Source of Supply	Net additional homes
Completions	3,047
Commitments (large sites)	3,090
Commitments (small sites)	216
Neighbourhood Plan Allocations	491
Deliverable HELAA sites (within settlement boundaries)	408
Non-Strategic Sites (under 300 homes)	1,250
Windfall	922
Strategic Site Allocations (over 300 homes)	10,650
Total	20,074

5.31 It is noted that the Non-Strategic Sites (under 300 homes per site) requirement of 1,250 has not yet been identified and is based on an assumption of additional allocation to Neighbourhood areas through new or reviewed Neighbourhood Development Plans and a Small Sites Allocation DPD.

Policy H SP1 – ‘Housing Requirement’. This policy provides for 20,000 new homes through the Local Plan. It shows a staggered trajectory with a lower first-five-year delivery of 610 dpa which then increases through the plan period. Paragraph 12.1.11 states sustainable growth of the villages will take place in a number of inland villages in order to develop their roles as well-connected sustainable villages serving inland Arun; providing an enhanced range of shops, employment, housing, community facilities and local services, supported by improved transport links. One strategic location is ‘inland villages’ including land around Westergate.

Policy H SP2 – ‘Strategic Site Allocations’. This policy Sets out requirements for strategic sites to properly planned for and includes many criteria to ensure sustainable development including a modern approach to the Garden City movement.

Policy H SP2c – ‘Inland Arun: Barnham/Eastergate/Westergate (SD5)’. This policy allocates 3,000 new homes to a new self-contained settlement at Barnham, Eastergate and Westergate although only 2,300 of these are identified as deliverable within the plan period. Local Plan Policy Maps 1 and 2 (2017) identifies the boundary of this strategic allocation as being adjacent to the Wings Nursery application site.



Site allocation SD5 extract from Local Plan Policy Map 2 (2017) with the application site identified in red

5.32 Strategic allocation SD5 is described as a new village with its own centre and associated infrastructure, whilst maintaining close links to the surrounding settlements. The policy also directly the following facilities to this new village: a Community Hub, a new well connected local centre with connections to the train station at Barnham, new retail, commercial and community facilities, healthcare facilities to serve Barnham, Eastergate, Westergate and Fontwell and a new A29 route with linkages and routing between the A259 (Bognor Regis Relief Road) to the south and A27 to the north with a bridge over the railway to the east of the current Woodgate crossing.

Small Site Allocations Development Plan Document

5.33 The emerging Local Plan Main Modifications and Local Development Scheme (2017-2020) state that a Small Site Allocations DPD may be needed to fulfil the District's Non-Strategic Sites requirement (1,250 homes) following the adoption of the Local Plan. If monitoring indicates that insufficient sites are being delivered through Neighbourhood Plans in a timely fashion, the Council will commence the production of a Small Site Allocations DPD to meet any identified shortfall. Evidence in the Council's Housing & Economic Land Availability Assessment (HELAA) will be used.

5.34 However, as of July 2017, it appears that the Council has already resolved to produce a Small Site Allocation DPD in the short term. Firstly, the Council's note to the Local Plan inspector in the Examination library (ADCED46 – July 2017) admits reliance on a Small Site Allocations DPD to address uncertainty around housing delivery. Secondly, the Council has sent a 'discussion paper' to parish councils advising that the non-strategic allocation of 1,250 new homes, in addition to sites already identified as being within built up area boundaries, need to be found through a 'combined option' of 585 within revised Neighbourhood Plans and 665 in the Small Site Allocation DPD.

5.35 It is understood that several parish councils including Aldingbourne may now opt to revise their emerging or adopted Neighbourhood Plans to take control of this additional allocation rather than be the recipient of a DPD allocation.

5.36 It should be noted that the Wings Nursery application site is identified within the HELAA as 'Developable' with a total yield of 55 units within the 2021-2023 timescale. It is therefore highly likely that this site will need to be allocated through the Small Site Allocation DPD, if not proactively allocated through a revised Neighbourhood Development Plan.

5.37 The Small Sites DPD is anticipated for adoption in Winter 2023 (as set out in the LDS), following the first review of non-strategic housing delivery in 2019.

Five year housing land supply to date

5.38 Paragraph 49 of the Framework states: "Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites."

5.39 The Council's Authority Monitoring Report 2015/16 sets out the background to the Objectively Assessment Need calculation for the District. In March 2015 the OAN was considered to be 758 dwellings

per annum. On 14th January 2016 an Objectively Assessed Needs (OAN) hearing took place in support of the Local Plan examination. The Inspectors conclusions dated March 2016, resulted in an OAN of 845 dwellings per annum. Subsequently, the 2014-based Sub-National Population Projections were issued by Office for National Statistics (ONS) in May 2016. Based on this updated data, a report by GL Hearn dated September 2016 increased the OAN to 919.

5.40 The OAN-based five year housing land supply requirement is therefore 4,595 (5×919) from the start of the Plan Period (2011).

5.41 The Authority Monitoring Report confirms that only 3,047 homes were completed against the 4,595 requirement in the first five years of the plan (2011-2016) leaving a shortfall to date of 1,548.

5.42 The Authority Monitoring Report goes on to conclude that this shortfall in housing land supply should be front-loaded within the next five year period (known as the Sedgefield Method). This would give a combined requirement for the first five years of 6,143 ($4,595 + 1,548$) but paragraph 47 of the Framework imposes a proscribed buffer on local authorities depending on their past record of delivery.

5.43 During the ten year period of 2006-2016, housing delivery in Arun averaged 542 units per annum and the relevant supply target was only exceeded once (in 2007/08) which constitutes “persistent under delivery”, triggering a 20% buffer to be added to the five year housing land requirement imposed by paragraph 47 of the Framework.

5.44 The five year housing land requirement to date is therefore 7,372 ($6,143 + 20\%$), derived from the OAN-based requirement (4,595) plus past shortfall (1,548) plus 20% of combined total (1,229).

5.45 Only 2,835 houses have been permitted or identified to meet this requirement within the first five years, indicating a 1.92 year supply against the requirement ($2,835 / 7,372 \times 5$).

5.46 The Secretary of State’s recent decision to uphold an Inspector’s allowing of an appeal for 400 dwellings at Fontwell (Ref: WA/22/15/OUT; 13 July 2017) confirms this position and the implications for decision-making in planning. In allowing the appeal, the Secretary of State commented: “in light of the Council’s representation that the position of the housing land supply is 1.92 years, and adopting a ‘policy off’ position until the adoption of the emerging Local Plan, he concludes, for the reasons set out by the Inspector, that the HLS is less than two years. ... The Secretary of State notes that the proposed modifications are yet to be finally examined and adopted. Given that there has been an almost doubling of the OAN to 919 dpa and a housing land supply that currently stands at around 1.92 years, the Secretary of State considers that limited weight can be attached to the Local Plan. ... Given the significant shortfall, the Secretary of State considers that only limited weight can be attached to the conflict with Local Plan Policies GEN2 and GEN3 ... the Secretary of State agrees that against a housing requirement over the plan period of 18,000 units, the application does not come close to the threshold of being significant or in closing off other options in terms of spatial strategy when the revised Local Plan is published”.

Five year housing land supply upon adoption of the Local Plan

5.47 For the Council to have a sound plan upon adoption in accordance with the NPPF, the plan must be capable of both meeting objectively assessed housing needs over the entire plan period (2011 – 2031) and

ensuring an adequate rolling five year land supply. Therefore the emerging Local Plan must ensure that an adequate supply of sites will be available to provide for a first five year land supply and maintain this over the course of the plan period once adopted.

5.48 The strategic housing land allocations within the Local Plan will contribute to the supply of housing land upon adoption, but not to the first-five years due to substantial lead-in times of these sites; the Council's first-five year housing land supply will therefore be critically dependant on non-strategic sites.

5.49 The Housing Implementation Strategy (March 2017) and Local Plan Examination Library Note ADCED46 (July 2017), produced to support the emerging Local Plan at examination, sets out the Council's housing strategy and approach to housing land supply and affordable housing provision.

5.50 Within the Housing Implementation Strategy, section 2 confirms that upon adoption of the Local Plan, the Council will only be able to demonstrate a 3.8 year supply or a 4.6 year supply using the Sedgfield or Liverpool methodologies, respectively. The suggested solution is for the Council to reply on the Liverpool methodology (contrary to its stance in other publications) given this provides a more achievable requirement and has formally requested neighbouring Local Planning Authorities help address the shortfall.

5.51 Section 3 confirms that a 1,250 home component of the anticipated supply upon adoption of the Local Plan is reliant upon as yet unidentified sites within future Neighbourhood Development Plans. This approach is untested and of significant risk with further necessary contingencies including the adoption of a Small Sites DPD if these unallocated sites fail to materialise. The Local Plan Inspector's letter to the Council (ref IDED21) questions the basis for the 1,250 allocation to the villages given that no sites have yet been identified and asks whether such sites can reasonably be included in the supply figures. Furthermore, he states that the overall housing strategy includes "very little flexibility (less than 0.5% [above requirement])" and goes on to say that the requirement of 20,000 should be expressed as a minimum figure.

5.52 Section 4 confirms that the housing delivery strategy of the Local Plan is very heavily reliant on strategy allocations across the plan period, but that this will not help achieve a five year supply upon adoption due to the significant lead-in times for these sites, mainly because of the need to provide supporting infrastructure. Smaller, more responsive sites, are therefore critical to achieving a first-five year housing land supply and the adoption of a sound local plan.

5.53 Section 5 confirms that a fundamental part of the Council's strategy is to rely on unallocated rural housing sites identified in the HELAA evidence:

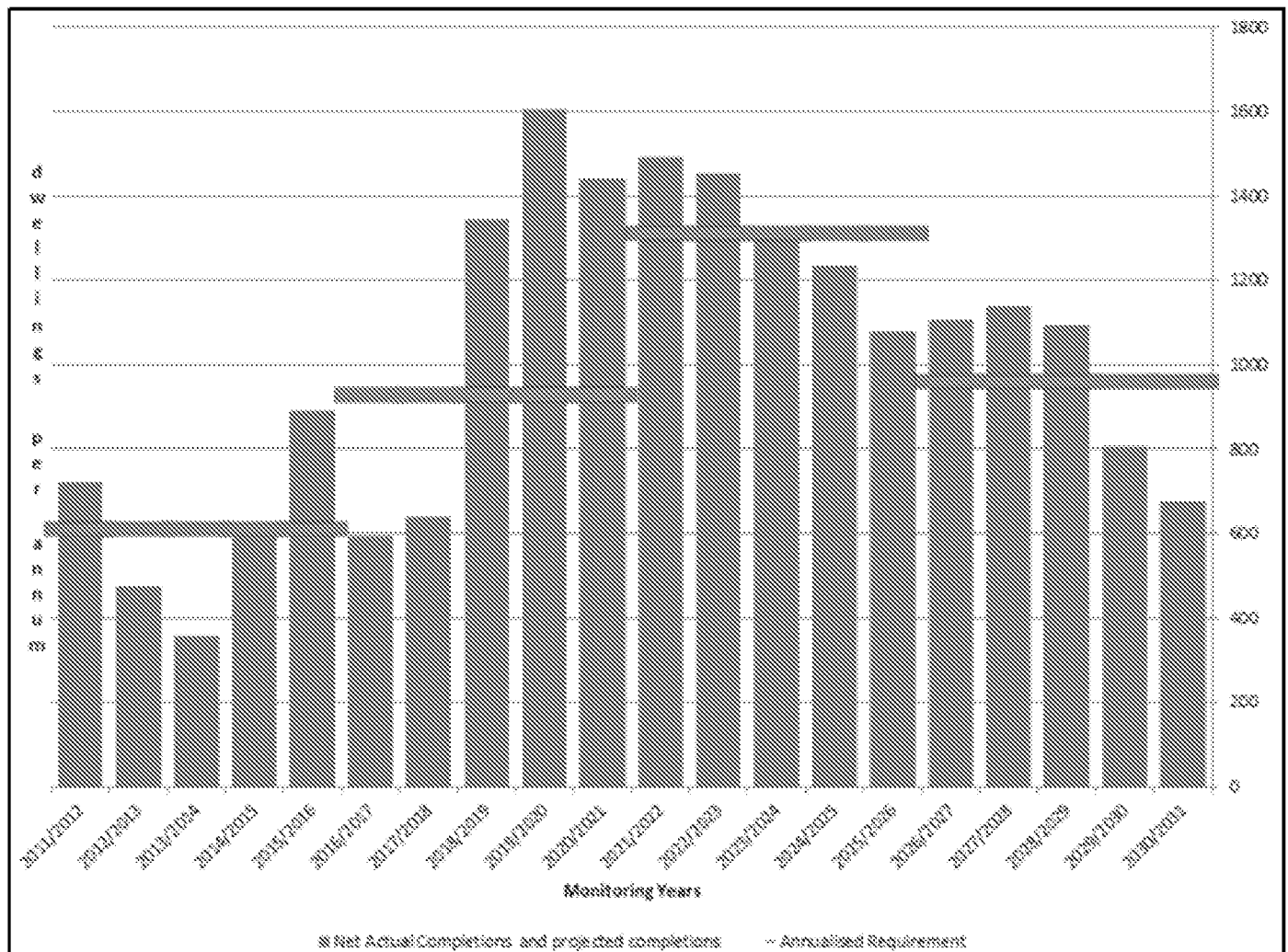
"Recognising the housing land supply shortfall that the Council is faced with in the short term because of the issues described [within the Housing Implementation Strategy] alongside a significant increase in the District's OAN, Officers presented a report to Local Plan Sub-Committee in December 2016...As a result, the Council has now agreed to invite planning applications immediately on identified HELAA sites...Whilst it was never expected that this would address all of the short term issues, it was considered to be essential in ensuring that the Council was looking at all options in increasing supply in the short term."

5.54 The application site is included in the Council's HELAA as referred to in this Planning Statement.

Accordingly, it can be seen that the application site is one of the non-strategic windfall sites that the Council has resolved to invite an application on in the short term as an essential measure to increase housing supply.

5.55 Section 7 concludes that with all identified planning supply counted, there is still no prospect of a 5 year housing land supply to cover the next 5 years upon adoption, even to meet the reduced annualised requirement using the Liverpool methodology. The Council's proposed solution to the Local Plan Inspector is a stepped-trajectory that will effectively set a lower, achievable first-five year housing land supply with a significantly increased five year requirement in future years of up to 1,600 dwellings in 2019.

5.56 It remains to be seen whether the Council's approach of a stepped-trajectory and reliance on a large number of unidentified non-strategic sites to make up the shortfalls later in the plan period is considered to be an appropriate or acceptable approach by the local plan examiner. But in any case, the current application site is identified as deliverable within the HELAA and is likely to be relied upon in future local plan supply if not within the first five years and is therefore considered to be in accordance with the emerging Local Plan housing strategy.



The Council's proposed approach of using a stepped trajectory.

6. Planning Appraisal

Principle of Development

6.1 The site lies adjacent to, but outside of, the built-up area boundary of the village of Westergate, as adopted in the Arun Local Plan and Aldingbourne Neighbourhood Plan. In normal circumstances, the principle of residential development in a location outside of a settlement boundary would be resisted as the development plan restricts housing in these locations to protect the countryside for its own sake.

6.2 However, this Planning Statement has established that the local planning authority is unable to demonstrate a five year housing land supply, as required by paragraph 47 of the Framework, and can in fact only demonstrate 1.92 years of supply.

6.3 Paragraph 49 of the Framework states that “Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a 5-year supply of deliverable housing sites”. Relevant policies for the supply of housing include adopted settlement boundaries and area-based housing targets. In these circumstances where a Local Plan (or relevant policies therein) is found to be out of date, significant weight must be afforded to the pressing need to boost housing supply and paragraph 14 of the Framework is engaged which defines the presumption in favour of sustainable development. This presumption dictates that permission should be granted without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits or where specific policies in this Framework indicate otherwise, with reference to special designations such as SSSI, Green Belt and National Parks.

6.4 Local Plan 2003 Saved Policies GEN2 and GEN3, which define built-up area boundaries and protect the countryside outside of these boundaries respectively, are therefore both considered to be out of date. Both policies rely on adopted settlement boundaries; GEN2 also only applies to development up to 2011 and GEN3 is intrinsically linked.

6.5 Furthermore, given the inability of the local planning authority to demonstrate a 3-year supply as referred to in National Planning Policy Guidance (paragraph 41-083), the Neighbourhood Plan policies relating to housing supply, including Policies EH1 and H6, should also be considered out of date.

6.6 This conclusion has been supported by multiple recent appeal decisions referred to earlier in this Planning Statement, where Planning Inspectors have repeatedly found the relevant policies to be out of date and attracting only limited weight. The Secretary of State’s recent decision at Fontwell (Ref:WA/22/15/OUT; 13 July 2017) confirms that due to the significance of the shortfall, only limited weight can be attached to Policies GEN2 and GEN3 and applications for up to 400 houses are insignificant in light of the need for 18,000 homes over the plan period, nor should they be resisted on the basis of prejudicing the spatial strategy of the emerging Local Plan.

6.7 As a result, the location of the application site outside of the adopted settlement boundary can be afforded only limited weight and cannot be a determinant factor in the consideration of the planning merits. Instead, a presumption in favour of sustainable development must be applied and the proposed development within this application must be considered on its own individual merits. This Planning

Statement sets out that the outline proposal represents sustainable development and no significant adverse impacts would arise that would allow the local planning authority to resist development in this location under the tests of the Framework.

6.8 It is also contended that the significant size of the housing land supply shortfall, at only 1.92 years, is a material consideration which, having regard to the provisions of paragraph 47 to significantly boost the supply of housing, should be afforded weight in the determination of this application. The proposed 55 homes are deliverable within the first five years and would provide a positive contribution to the Council's housing land supply shortfall, representing 6% of the annual OAN of 919 across the District assuming completion within one financial year.

Access

6.9 The means of access onto the site are to be considered in detail through this outline planning application.

6.10 Detailed supporting information about the means of access into the site is provided in the accompanying Transport Statement prepared by Russell Giles Partnership Ltd, alongside a Residential Travel Plan to encourage future residents to use sustainable modes of transport.

6.11 The Transport Statement outlines the key transport planning matters in accordance with the Department for Transport's (DfT) 'Guidance on Transport Assessments' (March 2007), reviewing site accessibility, planning history and relevant policy, proposed accommodation schedule, car and cycle parking requirements, access arrangements, servicing arrangements, proposed trip impact on the local road network.

6.12 The Residential Travel Plan mitigates the long-term effect of traffic impacts associated with the development and encourages residents to use sustainable travel methods as an alternative to the private car. The objectives of the Travel Plan are to reduce the number of single occupancy car journeys to and from the site; to reduce private car dependency leading to a corresponding increase in the proportion of travel by sustainable modes such as public transport, car sharing, walking and cycling; to promote the financial, environmental and personal health benefits associated with the 'active' travel modes of walking and cycling; and promote the Travel Plan and encourage participation amongst new households within national travel awareness events such as 'Bike, Walk and Liftshare' week.

6.13 It sets out a number of 'hard' infrastructural and 'soft' information-led initiatives, which would be implemented prior to new residents occupying the development. 'Hard' measures include the provision of on- and off-site infrastructure to support sustainable transport use such as new footway and cycleway and enhanced bus stops. 'Soft' measures predominantly involve the distribution and promotion of travel information and the Travel Plan itself.

6.14 The site as existing benefits from three formalised access points directly onto Lidsey Road, one at the northernmost boundary with the road, one immediately to the south of the house at 'Wings' and one at the southernmost boundary with the road. The house at 'Wings' will retain its own residential access.

6.15 Two existing vehicular access points onto the site will be retained. The main body of the site will be served via the existing central access point immediately to the south of Wings roughly in the middle of the site boundary with Lidsey Road, with four houses served separately by the existing northeast access.

6.16 The main access point would be formalised into a T-junction with a simple priority arrangement and would serve the majority of new homes. The access would have a combined lane width of 6.0m supported by 8.0m corner radii and would be supported by an informal right turn pocket on Lidsey Road which would allow vehicles turning right into the site to wait in the carriageway without obstructing the free flow of traffic on A29 Lidsey Road. The turning pocket would be provided through a simple break in the chevrons at the centre of the Lidsey Road carriageway opposite the proposed access. The turning pocket is c.2.5m wide providing sufficient width for an LGV to wait in the turning pocket as demonstrated in the Transport Statement (Drawing 2017/3711/002).

6.17 For pedestrians, the main access would be flanked by 2.0m wide footways on either side of the carriageway, tying in with the existing footways on the A29 Lidsey Road. Crossing facilities in the form of dropped kerbs and tactile paving would be provided to facilitate pedestrian movements across the access.

6.18 The main access point was the subject of an independent Stage I Road Safety Audit (RSA) under a previous scheme, undertaken by The Safety Forum (TSF) in January 2015. Whilst the proposed development differs from the previous scheme, the access remains the same and as such, the Stage I RSA is considered relevant. The recommendations arising from the RSA are intended to be applied and can be applied to the planning consent as a condition or included within the Section 106 obligations.

6.19 The northern access point serving four of the new dwellings would take the form of a cross over and would generate infrequent vehicles movements. The access width of 4.8m would enable vehicles to pass at the access if necessary, although instances of this would be infrequent and clearance is shown in the Transport Statement (Drawing 2017/3711/002).

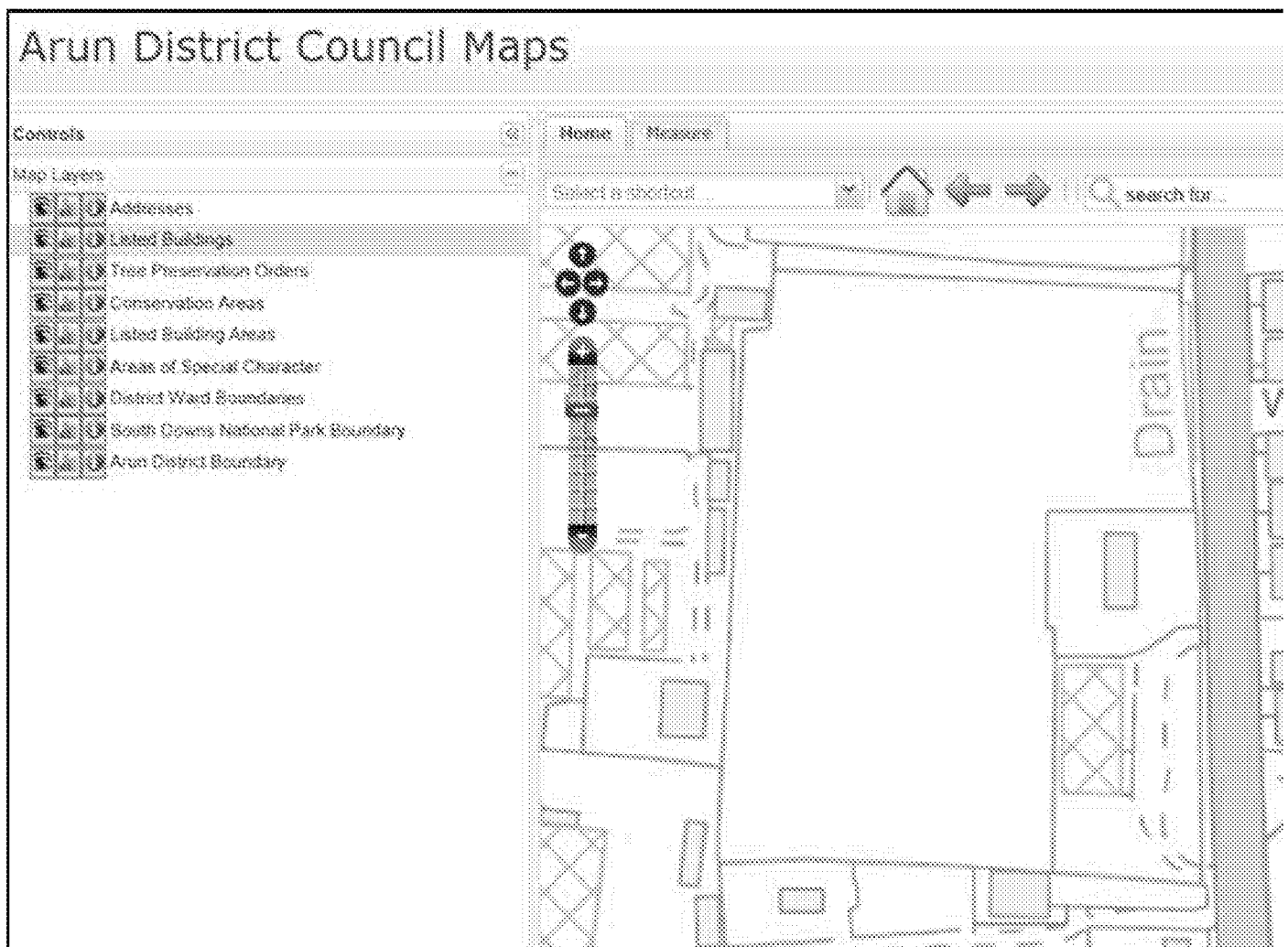
6.20 The site's southern access would be stopped up, providing a wider benefit to the local road network by removing the potential conflict point between vehicles turning right into Willows Caravan Park (on the opposite side of Lidsey Road) and those turning right into the site's southern access. The closure of the southern access would also remove the potential for vehicle conflict between the closely spaced private lane just south of the development site and the southern access.

6.21 The Transport Statement concludes that the proposed width, layout, visibility splays and capacity of the two site access points are sufficient to safely serve a development of 55 houses on site; pedestrian and cycle infrastructure is well served in the vicinity of the site and Personal Injury Accident data shows no pattern of incidents in terms of distribution, frequency or severity that would be of concern in terms of highway safety on the local road network.

Constraints

6.22 There are no planning designations, protections or other constraints on or adjacent to the site. There are no tree preservation orders within the site although there are several mature trees around the boundary and a specimen oak tree near the centre of the site which is to be retained.

6.23 The site is located within Flood Zone 1 as defined on the Environment Agency's Flood Risk Map benefiting from a very low potential for flooding events.



Arun District Council Constraints Map of the site.

Scale and Form

6.24 Although the detailed design and appearance of the proposal are reserved matters for a subsequent application, the accompanying Site Plan as Proposed, Street Elevation and Design & Access Statement demonstrate that the proposed 55 new homes will sit comfortably within the site at a net density of 30 dwellings per hectare.

6.25 There is an 80:20 ratio of houses to flats, complementing the existing tenure mix of the parish (as found by the 2012 Community Profile). There will be a mix of bungalows and two storey houses with gardens, private car parking spaces and public open space. As agreed at the local consultation event, bungalows will also be focused along the southern area of the site.

6.26 The illustrative site layout plan also indicates the intention to provide a large public open space (approx. 0.25 hectares) in the centre of the site with the specimen oak tree as its focal point. It can include sustainable drainage measures in the form of a balancing pond in the public open space and swales along the road frontage and a small-scale structure in the form of a pergola/ bandstand or children's play equipment, subject to the council's advice at subsequent planning application stage.

6.27 The inclusion of housing on the site, as shown in the illustrative plans, follows the well-established pattern of development along the A29 in Woodgate, with housing fronting onto the road with open curtilages, with streets of development extending behind. The indicative 'Street Elevation As Proposed' shows that the development would have spacious housing plots along the road frontage, allowing for glimpsed views of the streets and public space behind. This would preserve the character of the development pattern along Lidsey Road through the centre of Westergate.

6.28 Conversely, the modern development at Oak Tree Lane harms this characteristic pattern. It turns its back on the A29, with houses presenting their rear elevations to the road with 2m garden fences bounding the pavement. This creates the appearance of an isolated estate with a hard-boundary to the public realm. The full application will be carefully designed to ensure a characteristic and well-related appearance is achieved between the site and surrounding village context.

Sustainable Location and Access to Facilities by Sustainable Travel Modes

6.29 The Framework generally resists isolated new houses in the countryside but recognises that, in rural areas, housing is still needed and should be located where it would enhance or maintain the vitality of rural communities. It recognises that opportunities to maximise sustainable transport solutions varies between rural and urban areas, indicating that a lower level of sustainability may be expected and consequently may be acceptable, in areas such as Westergate.

6.30 It has also been confirmed by this Planning Statement that the adopted settlement boundaries can be afforded very limited weight in the consideration of this application due to the lack of a five year or three year housing land supply. The Framework therefore requires that the presumption in favour of sustainable development must be applied and permission should be granted without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits or where specific policies in this Framework indicate otherwise.

6.31 On that basis, the proposed development is promoted as a very sustainable location within the context of its village setting within 'Inland Arun' (designated for 5,950 homes through the Arun Main Modification Local Plan Housing Strategy and Policy H SP2c) that meets the requirements of the Framework without any significant or demonstrably harmful adverse impacts that would warrant refusal of the application.

6.32 The emerging Local Plan Housing Strategy and Policy H SP2c accepts that in order to deliver the required growth in the district, 5,950 homes are required in rural areas which may not have previously been considered the most sustainable locations. In this context and in light of the justification in this Statement, the application site (which is adjacent to the strategic allocation 'SD5') is highly sustainable.

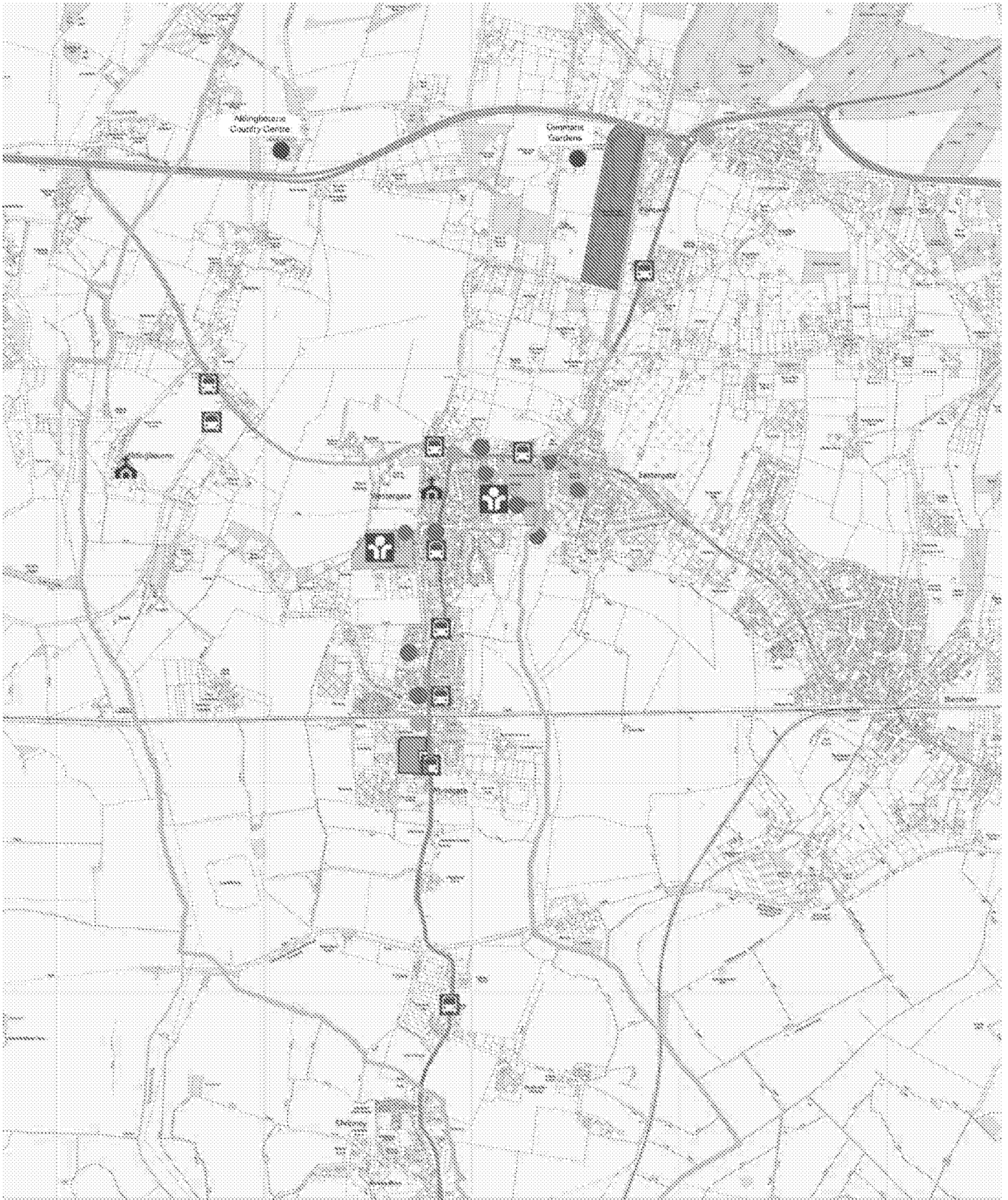
6.33 The site is located adjacent to the built-up area boundary with access directly onto the A29 as the primary arterial route through the village and is therefore well located to nearby services and facilitates as shown on the Aldingbourne Community Facilities Map.

6.34 The accompanying Transport Statement and Residential Travel Plan prepared by Russell Giles Partnership Ltd and referred to in the 'Access' section above demonstrates the sustainability of this site as measured against benchmark industry standards. The proposed Residential Travel Plan in particular seeks to reduce single occupancy car journeys and generally reduce dependency on the private car through a combination of hard and soft measures that will ensure the likelihood of future residents relying on the private car is as low as possible, even if the local area has higher car ownership than in more urban parts of the District.

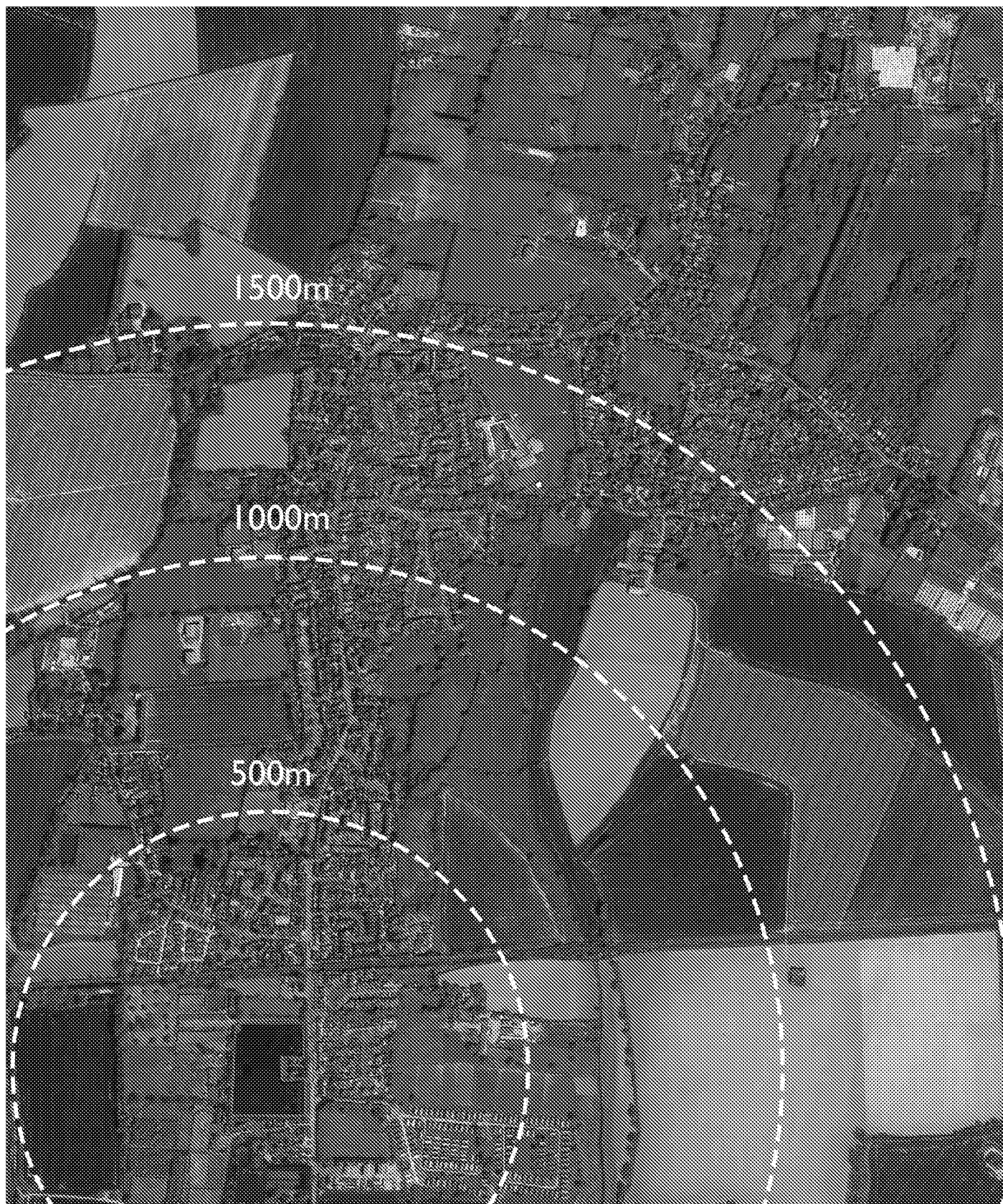
6.35 The Chartered Institute of Highways and Transportation (CIHT) publication 'Providing for Journeys on Foot' (2000) states that the average length of a journey on foot is 1 kilometre. The CIHT's publication 'Cycle Friendly Infrastructure' (1996), suggests that reasonably fit individuals can comfortably cycle a distance of 8 kilometres to workplace destinations. The surrounding villages of Fontwell, Walberton and Barnham, including Barnham railway station are therefore accessible by bicycle.

6.36 A well-lit and curbed pedestrian pavement is in place along the length of the site boundary with Lidsey Road providing a safe and convenient walking route to the rest of the village. The closest convenience store and post office is 200m or 2 minutes' walk to the north of the site. Aldingbourne Primary School is within 4 minutes walk from the northern entrance to the site at 420m and the Ormiston Six Villages Academy secondary school in northeast Westergate is less than 1 mile away by footpath, a short cycle or reasonable walking distance for students. The Woodgate Crossing does obstruct this route at times but if closed only causes a short delay and would not disincentivise walking or cycling given the general convenience of these short journeys by foot or bicycle. The Prince of Wales public house is located at the northeast corner of the site providing the nearest social facility. Although the public play spaces in the village are located slightly further away to the north, the application site is proposed to include its own play space which will fulfil this need in the Woodgate area.

6.37 Westergate is served by 2 bus routes, numbers 66 and 85; there are bus stops for the 66 service immediately outside the site entrance north and southbound. There is no railway station in Westergate, the nearest being at Barnham, some 2.5 miles from the site. Bognor Regis is the nearest large town, about 4 miles to the south (to the centre). In a very local sense, the 66 bus service is limited, although does go to the train station at Barnham and Bognor Regis. Nevertheless, Westergate is very well located to both



Aldingbourne Community Facilities Map with site highlighted



Walkability map showing proportion of wider settlement accessible by foot and bike

Bognor Regis and Barnham where sustainable transport links to the wider region are very good and so it would be possible to utilise public transport for journeys beyond these destinations whether the initial part was by bus (when available), bicycle or private car. A Residential Travel Plan is submitted in support of this application to encourage future residents to use sustainable methods of transport and its implementation could be secured through the Section 106 obligation.

6.38 Land between the villages of Westergate, Eastergate and Barnham has been allocated for 3,000 new homes (2,300 during the plan period) in Policy H SP2c of the Arun Main Modifications Local Plan (2017) and was classed as being 'a particularly sustainable location' in the Sustainability Appraisal carried out to inform the emerging Local Plan. This assessment is dependent on the provision of a wider package of infrastructure, particularly road improvements to the A29, but does nevertheless indicate that the general area is not isolated from the main urban centres and their associated facilities and sustainable transportation nodes. Taking a macro view in light of the wider context of the surrounding area and emerging Local Plan policy, rather than a micro-view confined to a limited bus service and railway crossing, the site is considered to be highly sustainable and well connected as well as offering an excellent level of local facilities and community infrastructure within walking and cycling distance.

6.39 The Parish Community Profile (AirS 2012) found that 13% of working-age adults work from home, which is a higher proportion than the county and national averages. Despite this only 10% of households were car-free. The Office for National Statistics 2011 report "Rural and urban areas: comparing lives using rural/urban classifications" found people in rural areas rely more on private transport and, in general, spend more on transport than their urban counterparts. Aldingbourne is therefore a typical rural community and is not in itself unsustainable.

Car and cycle parking provision

6.40 The accompanying Transport Assessment includes full details of car and cycle parking provision.

6.41 110 car parking spaces are proposed in line with the anticipated parking demand based on the WSCC Residential Parking Demand Calculator. The final location of the parking spaces will be determined through a subsequent detailed planning application.

6.42 Cycle parking will be provided in accordance with WSCC's residential cycle parking standards at a rate of 1 space per ½ bed house, and 2 spaces per 3+ bed house. Cycle parking will be provided within the curtilage of houses (either in garages or storage buildings within the rear gardens) and/or Sheffield stands for the small number of flats, providing safe and convenient storage options to provide encouragement for residents to cycle to and from the site.

Environmental Sustainability and Renewable Energy

6.43 The applicant is committed to securing a highly sustainable residential development. Full details will be confirmed at the reserved matters application stage but the indicative layout plan shows the inclusion of balancing ponds and swales along the boundary with Lidsey Road and within the public open space in the centre of the site, providing both a biodiverse habitat and attractive public realm. The accompanying Design and Access Statement expands on the sustainable drainage and biodiversity proposals including natural and soft-engineered drainage solutions, such as porous paving, surface water channels, rain water harvesting,

swales, French drains, ditches and ponds. The final design of the houses can include photovoltaic solar panels, high level insulation, rainwater harvesting and general carbon minimisation technology.

Landscape Character and Visual Impact

6.44 The accompanying Design and Access Statement provides a full analysis of the Landscape and Built Environment Character of the site and surrounding areas, which is summarised for planning purposes in this Planning Statement.

6.45 The application site does not have the character of open countryside, it is largely contained by houses, the A29, agricultural development and artificial boundary treatments. It is not part of the broader open spaces that are found around the periphery of the village where development is more sporadic and isolated and the difference between the built fabric of the village and the wider countryside is more apparent.

6.46 The site lies within Landscape Character Area 'LCA 13 Westergate Western Fringe' in the Arun Landscape Study (2006) which identifies landscape types and areas at an appropriate scale to understand the localised variation in character with the objective of providing the framework for the assessment of sensitivity, value and capacity. LCA 13 is summarised as follows:

LCA 13 Westergate Western Fringe

Patchwork of urban edge land uses, contained by boundary vegetation, on upper coastal plain adjacent to existing settlement.

- *Patchwork of horticulture (glasshouses / nurseries), Christmas tree plantation, paddocks, mobile home development and playing fields forming a transition between the built up area and arable farmland to the west.*
- *Linear residential development along Hook Lane.*
- *Vegetation includes native hedges and trees, together with cypress shelter belts*
- *Landscape Sensitivity: MODERATE*
- *Boundary vegetation well developed.*
- *Not distinctive. Mixed urban fringe uses.*
- *Generally on upper coastal plain adjacent to settlement.*
- *Strong green edge, visually separate and makes transition between village and farmland.*
- *Contribution to separation between Westergate-Aldingbourne; contains settlement of Westergate.*

Landscape Value: SLIGHT

- *Listed building setting*
- *Limited scenic beauty*
-

Landscape Capacity: MEDIUM/HIGH

6.47 The study identifies LCA 13 as having moderate sensitivity but only slight value and a medium/high capacity for new development. This is markedly more accommodating of new development than all of the surrounding study areas which all have substantial sensitivity and low or low/medium capacity. These areas are: LCA 11 Lidsey Coastal to the south, LCA 12 Park Farm Upper Coastal Plain further out to west,

LCA 14 Westergate Eastern Fringe immediately to east of the site and LCA15 Norton Upper Coastal Plain further to the north of the village.

6.48 The approach to the village from the south along the A29 enjoys long countryside views to east and west providing a strong rural setting and clear distinction from the settlements of Lidsey and Shripney to the south. The countryside setting ends and the built form of the village starts 150m south of the site at 'Lee's Yard' in Woodgate where the highway speed limit changes down from 50mph to 30mph and housing appears on the west of the road. From this point onwards the A29 appears to be within the village envelope with housing fronting onto both sides for stretches of the road until the Prince of Wales pub.

6.49 Within this context, the site makes only a very minor contribution to the rural setting of the village, being perceptible only from the A29 with no other public access across, adjacent to or nearby the site. From the A29, the site is only partially visible having substantial mature screening along much of the boundary and the existing dwelling-house of 'Wings' surrounded by dense evergreen planting. The southern end of the site, towards the outer reaches of the village at Woodgate, has an untidy appearance with dilapidated glasshouses, hardstanding, farming machinery, signage and scrub growth obscuring wider views of the site beyond (see photo below). Long views to the wider countryside are not possible at any point along the site's boundary with the A29 due to the high, mature screening on its far western boundary and the presence of agricultural buildings and tall glasshouses beyond.

6.50 The application site does not have any special qualities relating to the countryside and is not visible from the wider countryside area by virtue of being surrounded on all sides by buildings and boundary screening. The legacy of its former nursery use with tracts of hardstanding, dilapidated glasshouses, access points and signage could in part be considered 'brownfield land' and are not consistent with the high quality landscape areas found further out from the settlement boundary. Whilst redevelopment of this site would result in some loss of openness and a permanent change in the character of the land, this limited environmental impact must be weighed against the economic and social benefits that housing development brings. Therefore, although there would be some loss of openness within the site itself, the level of harm to the character and appearance of the settlement and indeed wider countryside would be negligible given the context of this site and ought to carry little weight in the planning balance against the benefits of development.



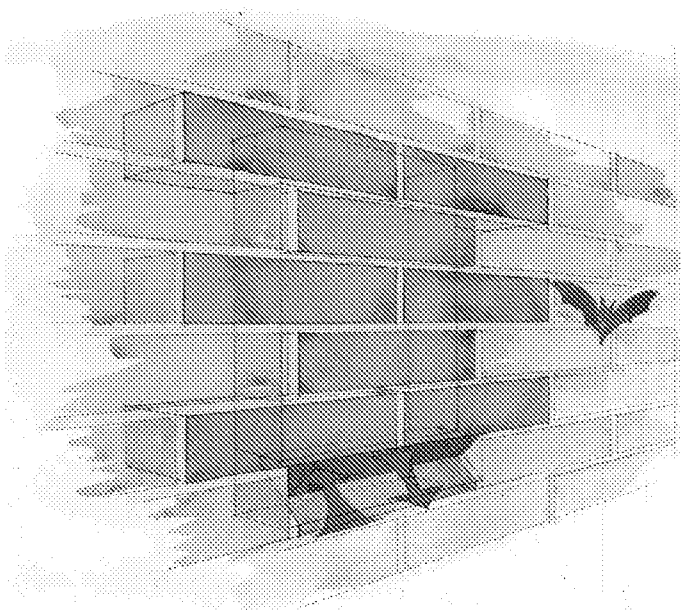
ADC Landscape Study - Appraisal Map



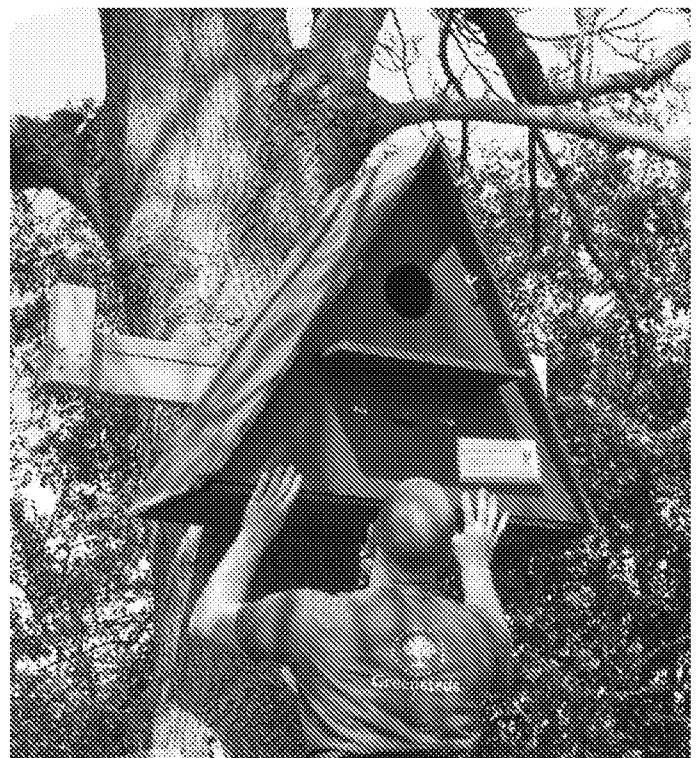
Southern area of the site showing previously developed land remaining from former nursery use.

Ecology

6.51 Arbeco Ltd were commissioned to carry out a Preliminary Ecological Appraisal (PEA) at the site which is submitted alongside this application submission. The PEA found habitats on site that had the potential to support certain protected species and, on the basis of the findings, further surveys have been conducted to investigate the potential presence of bats and reptiles on site. These surveys are also submitted in support of the application. The PEA concludes with recommendations which the applicant will undertake and the Council is invited to secure relevant matters by condition as required. These include the need for biodiversity enhancements to be incorporated into the scheme to enhance the ecological value of the site post development as well as the installation of bird and bat boxes, the creation of a wildlife pond, native species planting, an appropriate lighting scheme and the incorporation of gaps within proposed new fencing to allow for the dispersal species of principal importance including the European hedgehog *Erinaceus europaeus*, reptiles and amphibians.



Bat boxes may be integrated into building design



Existing mature trees present opportunities for bird boxes, including for owls

Community Infrastructure Levy

6.52 The Community Infrastructure Levy (CIL) is a mechanism that allows local planning authorities to raise funds from development to pay for infrastructure that is needed as a result of development. Once a CIL 'Charging Schedule' is adopted and brought into force, the levy will apply to most new buildings and will largely replace the use of Section 106 developer contributions.

6.53 Arun District Council began preparing a CIL Charging Schedule in 2014. Evidence base work including a Viability Assessment and Infrastructure Delivery Plan have been completed and will inform the setting of the Preliminary Draft Charging Schedule in due course (the initial stage of adopting a CIL Charging Schedule). Public consultation on the Preliminary Draft Charging Schedule took place in March and April 2015.

6.54 The Preliminary Draft Charging Schedule identified the application site as being within "Residential Zone 1 (Inland/Village)" with an associated charge of £250/sqm for new private housing (notwithstanding a labelling error on the included CIL Zoning Map).

6.55 However, CIL Charging Schedules are generally adopted alongside or following an up-to-date Local Plan. Due to the suspension of the Arun Local Plan Examination to late 2017 by the appointed Inspector, progression of the CIL to Draft Charging Schedule stage is currently in hiatus and anticipated for adoption in Summer 2020.

6.56 Infrastructure contributions and other planning obligations arising from the application site will therefore be secured through Section 106 and Section 278 agreements.

7. Conclusion

7.1 This Planning Statement has provided an introduction to the proposed development, provided the planning policy context including recent appeal decisions, established that no five-year housing land supply position can be demonstrated and proven that in light of this and in any case, the site is on ideal land for housing in a sustainable location. The site is unconstrained in planning terms and is proven to be an ideal site for redevelopment following its previously developed former nursery use. It also contributes only minimally to the setting of the village and is not visible in wider views from the surrounding countryside, being within a Landscape Character Area with only Slight Value and Medium/High Landscape Capacity.

7.2 The application seeks outline planning consent for the construction of 55 residential dwellings on land at Lidsey Road, south west of Woodgate Crossing. All matters are reserved except for the means of access into the site which is to be considered as part of this application. Detailed consideration of site layout, design, parking, open space, landscaping etc are therefore reserved for a subsequent full planning application.

7.3 The proposed housing will provide a mix of sizes, types and tenures that reflect closely the existing make-up of the parish as evidenced in this Planning Statement and includes 33% affordable housing that could be delivered through a local Community Land Trust (CLT) led by the Parish Council.

7.4 The illustrative site layout plan, shaped through discussions with the Parish Council and a community consultation event in July 2017, indicates the ability to provide a large public open space (approx. 0.25 hectares) in the centre of the site with sustainable drainage measures in the form of a balancing pond in the public open space and swales along the road frontage, providing both a biodiverse habitat and attractive public realm.

7.5 The Council's HELAA (2016) found the site (Reference 32) to be 'Developable' with a yield of 55 units within the 2021-2023 timescale. Delivery within that time period would be 'deliverable' within the first five-year housing land supply at today's date in 2017.

7.6 The Planning Policy Framework section of this Planning Statement demonstrated how the outline application meets the relevant policies of the Arun District Council Saved Local Plan and Aldingbourne Parish Council Neighbourhood Development Plan (NDP). It also charts the historic support for allocating housing on the site by the Parish Council throughout its NDP examination process.

7.7 Regarding the emerging Arun Local Plan, this Planning Statement has found it will rely heavily on unallocated, rural sites to deliver its housing strategy including the Non-Strategic Sites requirement of 1,250, of which none have been identified but are based on an assumption of additional allocation to Neighbourhood areas and a Small Sites Allocation DPD. The application site is identified as deliverable within the HELAA. It is therefore likely to be relied upon in the emerging Local Plan Housing Strategy as one of the non-strategic windfall sites. The Council has already resolved to invite an application on these in the short term as an essential measure to increase housing supply. It also remains to be seen whether the emerging Local Plan's reliance upon a stepped-trajectory and large number of unidentified non-strategic sites to make up the evident housing land supply shortfall will be considered appropriate or acceptable by the Local Plan Examiner. In any case, the application site is within the broad location of 'Inland Arun' identified for 5,950 homes (including 3,000 to the Barnham/Eastergate/Westergate location adjacent to the

application site), indicating it is a very sustainable location for growth.

7.8 Crucially, this Planning Statement establishes that the Council can demonstrate a housing land supply position of only 1.92 years against the requisite five year supply (plus 20% buffer) and that only limited weight can be attached to planning policies restricting development outside of adopted settlement boundaries which cannot be a determinant factor in the consideration of the application's merits. Instead, a presumption in favour of sustainable development must be applied in accordance with the Framework and the proposed development within this application must be considered on its own individual merits and granted without delay unless significant and demonstrable harm would result. This Planning Statement sets out that the outline proposal represents sustainable development and no significant adverse impacts would arise that would allow the local planning authority to resist development in this location under the tests of the Framework.

7.9 It is also contended that the significant size of the housing land supply shortfall, at only 1.92 years, is a material consideration which, having regard to the provisions of paragraph 47 to significant boost the supply of housing, should be afforded weight in the determination of this application. The proposed 55 homes are deliverable within the first five years and would provide a positive contribution to the Council's housing land supply shortfall, representing 6% of the annual OAN of 919 across the District assuming completion within one financial year.

7.10 This approach to the Council's five year housing land supply position and emerging Local Plan has been supported through multiple appeal decisions and the Secretary of State, as referred to in this Planning Statement, who found in July 2017 that due to the significance of the housing shortfall, only limited weight can be attached to adopted settlement boundaries and applications for up to 400 houses are insignificant in light of the need for 18,000 homes over the plan period, nor should they be resisted on the basis of prejudicing the spatial strategy of the emerging Local Plan.

7.11 The Planning Appraisal section considers the merits of the proposal with a focus on access arrangements with all other matters reserved for a subsequent planning application.

7.12 Access at two main points along the site boundary with Lidsey Road / A29 is proven to be safe and convenient for vehicles as well as cyclists and pedestrians and the site is well located to community services and facilities and accessible by sustainable modes of transport. A Residential Travel Plan is also provided which includes hard and soft measures to ensure sustainable travel choices by future residents.

7.13 The site has no planning constraints or other designations on or adjacent to it; the scale and form of the development will sit comfortably within the site at a density of 30 dwelling per hectare with a characteristic road frontage and reflect the tenure mix of the parish; the houses will be well-located to local community services and facilities as well as providing new open space and play areas for the local area. Cycle and car parking provision as well as sustainability measures and renewable energy generation can all be provided to appropriate standards, to be secured through a subsequent planning application. Finally and importantly, the site lies within Landscape Character Area 'LCA 13 Westergate Western Fringe' in the Arun Landscape Study (2006) having only Slight Value and Medium/High Landscape Capacity.

7.14 Any outstanding matters can be secured by condition or through the necessary subsequent planning application.

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