

PLANNING STATEMENT
WINGS NURSERY, LIDSEY ROAD, WOODGATE, PO20 3SU



W HALEBACK
Trinity Cottage
Boxgrove
Chichester
PO18 0NW

Site	Wings Nursery, Lidsey Road, Woodgate, PO20 3SU
Project	Outline Planning Application ´ 55 dwellings
Applicant	Stephen Keet
Our Ref	W 1854
ate	March 2019
revision	-

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Introduction

1. W HALEBAC K is instructed by the applicant to prepare and submit an outline planning application for the construction of 55 residential dwellings on land at Lidsey Road, W oodgate at the larger settlement of W estergate. The site is within the Parish of Aldingbourne and Barnham W ard, within Arun District.
2. This application follows application AL/115/17/OUT refused on 8 August 2018. Since this point the applicant has sought engagement with Arun District Council as local planning authority, Aldingbourne Parish Council and the Aldingbourne, Barnham & Eastergate Community Land Trust (CLT) as local stakeholders. The new application proposes an agreement within the Section 106 agreement to secure affordable housing for local needs managed by the CLT.
3. The outline application seeks approval for the access and scale, with all other matters reserved. For that reason, an illustrative layout plan is provided indicating the possible layout but the final design of development is reserved for the later full application.
4. This Planning Statement should be read in conjunction with all other documentation including illustrative drawings and submitted evidence.
5. This Statement introduces the site and surroundings and summarises the proposed development. The relevant planning history and policy framework are detailed following by a planning appraisal of the merits of the scheme.

Site and Surroundings

7. 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.
8. 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.
9. 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.
10. 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.
11. 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.
12. 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.
13. 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 beyond at 4 miles. The boundary of the South Downs National Park follows the A27, 2 miles to the north at Fontwell. Chichester is 7 miles to the west by road.
14. 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.
15. 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 non-traditional appearance.



Site location in context



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



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



Bus Stop adjacent to site access.



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



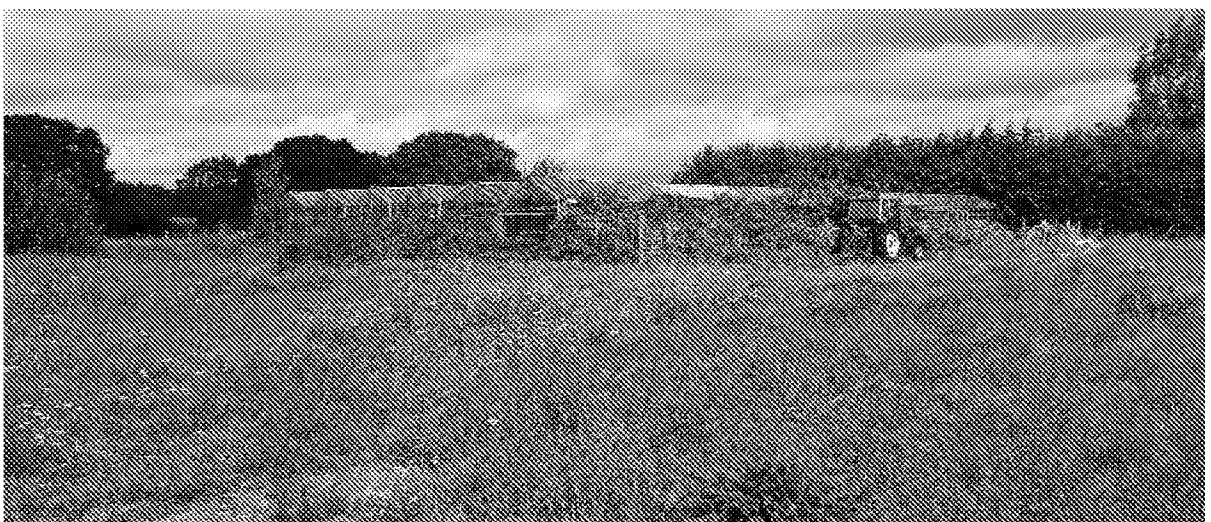
Housing opposite the site across Lidsey Road / A29 to the east.



View within site from north to south



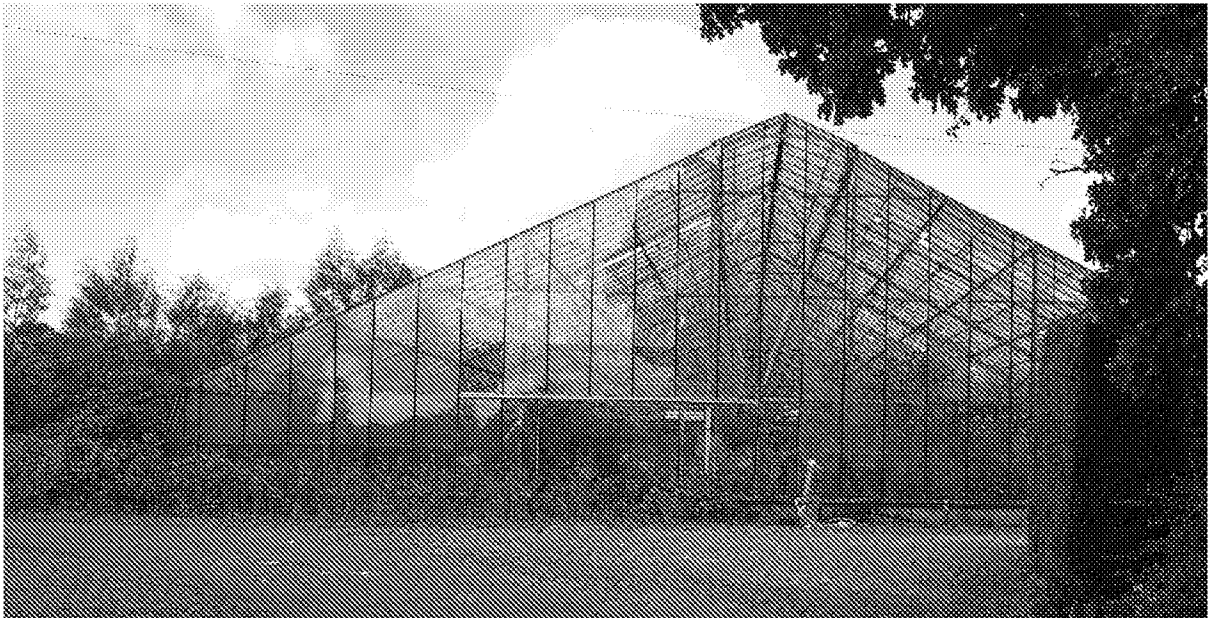
View within site from south to north.



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.



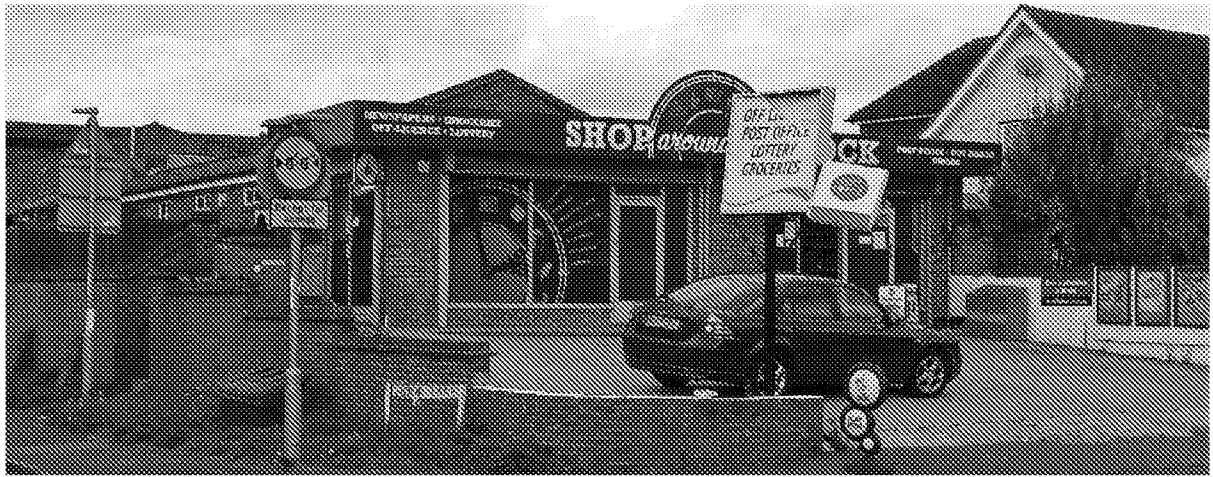
Southern boundary as viewed from within the site showing existing development to the south.



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



Prince of Wales put, 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 opposite the application site

Proposed Development

16. Fifty five (55) residential dwellings are proposed. The outline application seeks approval for matters of access and scale, with all other matters reserved. For that reason, an illustrative layout plan is provided indicating the possible layout but the final design of development is reserved for the later full application.
17. The proposed development as described on the application form is:
 _Outline application for the erection of 55 dwellings, access arrangements, sustainable drainage measures, public open space, landscaping and all other associated works (scale and means of access to be considered, all other matters reserved):.
18. Gross development density is 21.15 dwellings per hectare (dph) across the whole site with a net density of 30.22 dph if internal access routes and infrastructure are excluded.
19. The final mix of dwellings will be determined alongside the other reserved matters through a subsequent full planning application and informed by the current work of the Aldingbourne Parish Council for its Neighbourhood Plan Review but an indicative mix is provided (as shown on the illustrative site layout plan):
20. 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
21. 18 Affordable Homes, of which:
 - ¿ 15 x 2 Bedroom houses
 - ¿ 2 x 2 Bed Flats
 - ¿ 1 x 1 Bed Flat
22. 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%
23. 33% of new dwellings will be provided as affordable housing (18 units). Please see the accompanying Affordable Housing Statement for further information about these units.
24. 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. We understand that the Parish Council and CLT are undertaking a needs assessment in Spring 2019 and this evidence can inform the future detailed design stages through the full application to refine the accommodation schedule.
25. Detailed supporting information about the means of vehicular and pedestrian access into the site is provided in the accompanying Transport Statement and addendums 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.

26. 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. 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

27. 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.
28. The event was attended by 32 local residents and generated much discussion with 2 follow-up written responses. 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 involvement of a local CLT was also raised which has now been delivered.
29. 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.
30. The indicative plans proposed through this application have taken into account the comments arising from this community consultation event.
31. The applicant undertook extensive engagement with the Aldingbourne Parish Council and the Aldingbourne, Barnham & Eastergate Community Land Trust (CLT) as local stakeholders prior to submission of this application with the intention of securing affordable housing for local needs in perpetuity. The new application proposes an agreement within the Section 106 agreement to secure affordable housing for local needs managed by the CLT.

Relevant Planning History

32. 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.
33. 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.
34. Two pre-application enquiries have been registered with Arun District Council:

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.

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.
35. A similar planning application on the site was submitted in October 2017:

AL/115/17/OUT: Erection of 55 dwellings. Refused, August 2018.
36. The reasons for refusal of this application are addressed in the Planning Appraisal section of this statement further below.

Relevant Planning Appeals in the Local Area

APP/C 3810/W /16/3155330 - Land off Hook Lane, Westergate ' Allowed.

APP/C 3810/A /14/2220943 - Land west of Westergate Street, east of Hook Lane, Westergate, Sussex, PO20 3TE ' Allowed.

APP/C 3810/A /14/2217385 - Land at Nyton Road and Northfields Lane and Land off of Fontwell Avenue ' Allowed.

Housing & Economic Land Availability Assessment (HELAA)

37. The LPA's HELAA report concludes that the application site is 'Deliverable' with a potential yield of 60 dwellings in the first five years (HELAA ref 32).
38. The findings of the HELAA are not binding on the LPA in its decision-making function but can be a material consideration having been the subject of a planning assessment.

Current Status		Deliverable
Projected Potential Yields		
Suggested Density		Suggested Total Yield
30		60

Planning Policy Framework

39. The Development Plan now consists of the Arun District Local Plan 2011-2031 (adopted July 2018), the West Sussex Waste and Minerals Plans and Aldingbourne Neighbourhood Development Plan (2014-2034) (adopted November 2016). The Aldingbourne Parish Council resolved in January 2019 to review their Neighbourhood Plan and on 2nd April 2019 published a draft version (see below).

National Planning Policy Framework

40. 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 11).
41. 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 the development should be considered against other policies of the Framework in the round.
42. Paragraph 59 seeks 'to boost significantly the supply of housing'. In doing so, local planning authorities are required to use their planning policies to meet the full Objectively Assessed Need (OAN) for market and affordable housing.
43. NPPF paragraph 73 directs LPAs to annually update a list of specific, deliverable sites sufficient to provide a minimum of five years' worth of housing against their local plan requirement. The LPA Local Plan (adopted in July 2018) is currently defined as 'recently adopted' by paragraph 73(b) and footnote 38 which temporarily allows the LPA to avoid producing an annual position statement. Paragraph 73 does not exempt the LPA from needing to demonstrate its 5-year land supply position once per year as per government guidance nor updating annually a list of specific, deliverable sites to provide a supply in years one to five as required by paragraph 67 in any case. The LPA has not published a land supply position in 2018/19 (the most up-to-date Local Plan position is as-at April 2017).
44. The revised NPPF established a new method of measuring local planning authorities performance called the Housing Delivery Test. Government confirmed in February 2019 that Arun District Council failed to meet its housing targets over the previous three years, achieving only 91% and is therefore required to produce an Action Plan to address this by June 2019.

Arun District Local Plan 2011-2031

45. The LPA, in refusing application AL/115/17/OUT, referred to the following policies in its Decision Notice, these are therefore considered to be the main relevant policies for the new application:
- ¿ Local Plan Policy C SP1 Countryside
 - ¿ Local Plan Policy SO DM1 Soils
 - ¿ Local Plan Policy AH SP2 Affordable Housing

- ¿ Local Plan Policy OSR DM1 Open Space
- ¿ Local Plan Policy T DM1 Sustainable Travel and Public Rights of Way
- ¿ Local Plan Policy INF SP1 Infrastructure provision and implementation
- ¿ Neighbourhood Plan Policy EH1 Built Up Area Boundary
- ¿ Neighbourhood Plan Policy H6 Windfall Sites

46. Relevant Supplementary Planning Documents include:

- ¿ SPD1 Open Space and Recreation Standards
- ¿ SPD3 Parking Standards

Aldingbourne Neighbourhood Development Plan 2019 - 2036

- 47. The extant Aldingbourne Neighbourhood Development Plan 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.
- 48. The adoption of the Arun District Local Plan 2018 required a review and where appropriate amendment of the Aldingbourne Neighbourhood Plan to ensure the two documents are in alignment and reflect the new policies.
- 49. The Aldingbourne Parish Council resolved in January 2019 to review its Neighbourhood Plan and on 2nd April 2019 published a Regulation 14 Pre-Submission Draft version and resolved to publish for consultation.
- 50. The application site, Wings Nursery, is included within the consultation draft Neighbourhood Plan Review as a housing allocation for 55 houses under 'Policy H1 2019'.

Policy H1 2019	Provide housing to meet District Council allocation
Permission will be granted, within the Plan period, for housing on land identified on the Proposals Map as follows:	
1.	Land at Wings Nursery, Lidsey Road - 55 dwellings
2.	Land north of Lees Yard, Lidsey Road - 37 dwellings
Proposals will be expected to conform to the other policies in this Plan and also to provide (through S106 or CIL) funding to deliver improvements to the Aldingbourne Sports and Community Centre.	
H1.1 2019	ADC has given the Parish an allocation of 70 houses. 25 units have been granted planning permission in 2019 at Nyton Nursery and can be counted towards the allocation. Therefore, with the two additional sites allocated by this policy the Parish will have exceeded its allocation by 47 units and increase of 67%.
H1.2 2019	A percentage of housing delivered by both sites will be expected to be delivered through the Aldingbourne, Barnham and Eastergate CLT.

51. The application is therefore proposed to be included within this Development Plan document, allocated within the settlement boundary as defined by Policy EH1 and Map E of the Neighbourhood Plan, and is therefore fully supported by the emerging plan.

Non-Strategic Sites Development Plan Document (NSS-DPD)

52. The Council is preparing a Non-Strategic Sites Development Plan Document (NSS-DPD) to fulfil an identified deficit of 1,250 houses from smaller sites (under 300 units each) in the Local Plan (see supporting text to Policy H SP1). The NSS-DPD will be published for Regulation 18 consultation in May or June 2019.
53. The NSS-DPD will draw deliverable sites from the HELAA; the application site is identified as 'deliverable' in the HELAA and so there is every likelihood that it will be allocated in the NSS-DPD in any case, indeed the applicant was advised to pursue this route in August 2018 by the District Council at planning committee.

Five Year Housing Land Supply

54. NPPF paragraph 73 directs LPAs to annually update a list of specific, deliverable sites sufficient to provide a minimum of five years' worth of housing against their local plan requirement. The LPA Local Plan (adopted in July 2018) is currently defined as 'recently adopted' by paragraph 73(b) and footnote 38 which temporarily allows the LPA to avoid producing an annual position statement. Paragraph 73 does not exempt the LPA from needing to demonstrate its 5-year land supply position once per year as per government guidance nor updating annually a list of specific, deliverable sites to provide a supply in years one to five as required by paragraph 67 in any case. The LPA has not published a land supply position in 2018/19 (the most up-to-date Local Plan position is as-at April 2017).
55. The LPA's latest published five year supply position (based as-at April 2017) claims to demonstrate a 5.3-year supply of deliverable housing sites. This figure is incorrect by virtue of: a serious statistical error; being based on an out-of-date base date; using a superseded methodology; and, failing to appropriately or rationally consider best available evidence of site-specific deliverability. These issues are described in turn.

Error in the LPA Housing Requirement figure

56. Appendix 1 to this Statement sets out in detail that a statistical error in the annualised requirement figure (930 instead of 1,120) led to a fundamental flaw in the housing land supply calculations and caused a false five-year supply result.
57. Correcting this figure, the Council by its own calculations has a 4.6-year supply (notwithstanding further errors addressed below).

Out-of-date calculation base date

58. The LPA's five-year supply calculations used a base date of April 2017 and were last updated in September 2017. The appropriate base date at the date of submission of this application in March 2019 is April 2018; the appropriate base date for the decision of this application will be April 2019. This Statement calculates the base date at April 2018.

Superseded methodology

59. The LPA's five-year supply calculations rely heavily on anticipated delivery from strategic sites in the first five years. The revised NPPF sets a higher bar for the assessment of 'deliverability' and explicitly rules-out the inclusion of strategic sites in the Annex 2 Glossary except in certain circumstances (which are largely not met in Arun). Many of the strategic sites upon which the land supply calculations are based are already falling behind their anticipated delivery timescales.

Failure to consider best available evidence

60. The LPA's calculation ignores obvious and rational evidence of delays to the projected delivery of strategic sites underpinning its housing trajectory to artificially inflate its five-year supply position.

Five Year Housing Land Supply Requirement

61. Local Plan Policy H SP1 'The Housing Requirement' sets a requirement of 'at least' 20,000 new homes within the plan period of 2011 to 2031, or 1,000 dwellings per year on average although a stepped-trajectory is employed in Arun and so annualised figures are more difficult to summarise but the trajectory-based five year requirement is 5,980. To date, the LPA has fallen short of its requirement by 922 units.
62. The Local Plan (paragraph 12.1.5) applies the Sedgefield approach to addressing its shortfall and so 922 units are added to the base five-year requirement to give a gross requirement of 6,902. A 10% buffer is applied by NPPF paragraph 73(b). An up-to-date Five Year Requirement is therefore 7,592.
63. In order to test the LPA's projected performance against the five-year requirement, the components of housing land supply must be analysed.

Housing supply components

64. The combined commitment figure for all sites from 2018/19 to 2021/22 (the current five-year assessment period) derived from County Council and District Council data is 2,124 units.
65. A Windfall estimate of 163 units is used.
66. A further three sites within the HELAA Appendix 1.1 are identified as being 'Commitments in [West Sussex County Council Residential Land Assessment] 2019: and amount to 86 units.
67. The LPA also relies on 207 units from HELAA sites within settlement boundaries.

Strategic Site Allocations

68. NPPF Annex 2 defines deliverable sites and requires clear evidence that completions will begin on site within five years. Only a small number of houses from the Local Plan-allocated strategic sites can be relied upon in the first five years but the LPA in its out-of-date trajectory relies on 3,565 houses coming forward from strategic sites between 2017 and 2022.
69. At the date of submission of this application, only four of the eleven strategic sites in the Local Plan (SD1 to SD11) have approved or pending outline planning applications and could possibly meet the deliverability tests of the NPPF. Of these, only the extant outline permissions at sites SD1 and SD6 (notwithstanding the High Court challenge to SD1) can be considered actually 'deliverable' under the tests of the NPPF. The deliverable strategic sites can soundly contribute only 550 units to the five-year supply.

Five Year Housing Land Supply Position

70. Based on the analysis above the following five-year supply position should be considered up-to-date for the purposes of this application.

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Consequence of Failure in Five Year Housing Land Supply

71. NPPF paragraph 11(d) directs decision-makers to apply a presumption in favour of sustainable development if the most important policies for determining the application are found to be out-of-date because the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. In these circumstances, applications involving the provision of housing should be granted permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
72. Because the LPA cannot demonstrate a five-year supply of deliverable sites, the policies most important for determining the application including those relating to settlement boundaries must be considered out-of-date and the tilted balance of material considerations is engaged. Those out-of-date policies can only be afforded very limited weight and are not a determinant factor in the consideration of the planning merits of the application.
73. The substantial size of the housing land supply shortfall is also a material consideration to support the Government's objective of significantly boosting the supply of homes and the Local Plan's reliance on delayed strategic sites exposes the LPA to considerable shortfalls now and in the years to come.
74. 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.

Effect of Aldingbourne Neighbourhood Plan

75. The application site is within Aldingbourne Parish and a made Neighbourhood Plan is in force and so the tests of NPPF paragraph 14 must also be addressed. Paragraph 14 sets four tests, all of which must

be met before the presumption in favour of sustainable development is engaged in Neighbourhood Plan areas.

76. The Aldingbourne Neighbourhood Development Plan was adopted in September 2016 and therefore fails the first test (a) being made more than two years prior to the date of this application. The Parish Council was informed by Arun District Council in December 2018 that it requires 70 further homes in the Parish to meet its housing requirement, to be identified through a review of the neighbourhood plan. It is therefore clear that the Neighbourhood Plan no longer meets its identified housing requirement which fails the second test (b).
77. On this basis, the presumption in favour of sustainable development is confirmed.

Planning Appraisal

78. The present application follows the local planning authority's refusal of a similar application (AL/115/17/OUT). In its Decision Notice in that case, the LPA referred to a specific number of policies (set out in the Planning Policy Framework section above) which are therefore considered to be the main relevant policies for the new application to overcome.

General Principle of Development

79. As of April 2019, Aldingbourne Parish Council has published its Draft Neighbourhood Plan Review which includes the application site as its preferred development location. The application is therefore proposed to be included within this Development Plan Document, allocated within the settlement boundary, and so supported by the emerging development plan. On that basis, the application should be approved as being in general conformity with the most up-to-date development plan as required by the NPPF.
80. Furthermore, the lack of a five year supply of deliverable housing sites in Arun District means that the presumption in favour of sustainable development is triggered and the tilted balance of material considerations is engaged. The consequence of this presumption, as directed by the NPPF paragraph 11(d), is that the most important policies for determining the application including those relating to the settlement boundary and countryside must be considered out-of-date.
81. In these circumstances, applications involving the provision of housing should be granted permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
82. Add to this that the substantial size of the housing land supply shortfall is also a material consideration to support the Government's objective of significantly boosting the supply of homes and the Local Plan's reliance on delayed strategic sites exposes the LPA to considerable shortfalls now and in the years to come.
83. In addition, the District Council has also failed its Housing Delivery Test and is required to produce an Action Plan to rectify its failing housing delivery policy by June 2019.
84. In this context, the District Council should be approving sustainable housing development such as proposed in this application without delay.

Policies relating to the Principle of Development

85. Local Plan Policy SD SP1 'Sustainable development' takes a positive approach that reflects the NPPF presumption in favour of sustainable development. Supporting text to this policy refers to NPPF definitions of sustainable development and the importance of sustainable transport and locating new development close to places where people need to travel to. The LPA previously considered the sustainability merits of the site and recommended permission of the previous application (AL/115/17/OUT) in its July 2018 Committee Report, before being deferred to a later committee upon adoption of the Local Plan. At that time, the LPA could not demonstrate a five-year supply (as is the case now) and applied the presumption in favour of sustainable development. The LPA's conclusion at that time was that the site represented sustainable development.

86. Local Plan Policy C SP1 seeks to direct new residential development to be within existing settlement boundaries, restricting development in principle for the remaining countryside area to a closed list of categories. Policy C SP1 is therefore important for determining the acceptability of the application and is subject to the test of NPPF paragraph 11(d) that decision-makers should apply a presumption in favour of sustainable development and permission be granted if such a policy is found to be out-of-date. Because the LPA cannot demonstrate a five year supply, this policy must be considered out of date. Furthermore, the emerging Aldingbourne Neighbourhood Plan seeks to allocate the application site within the settlement boundary and so in due course the application will be in full compliance with Policy C SP1 in any case.

Landscape Character and Visual Impact

87. Where the presumption in favour of sustainable development is triggered the NPPF paragraph 11(d)(ii) sets a final test that permission be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. The presumption in favour of sustainable development therefore must be weighed against the desire to protect the intrinsic character and beauty of the countryside.
88. The application site will cause no harm in this respect due to the design of the proposal and the existing character of this area. Before considering any harm, it must be established what constitutes the existing character of the site and area.
89. The legacy of the application site's former nursery use is clear with tracts of hardstanding, dilapidated glasshouses, access points and signage; it could in part be considered brownfield land. The site is surrounded by existing built development including houses, the A29 Lidsey Road, further glasshouses, the Prince of Wales Public House and mature boundary screening. The residential area of Woodgate extends from the site to the east including the housing estates of Oak Tree Lane and Woodgate Road directly opposite the application site and the larger residential area of Westergate lies nearby to the north. There are no public vantage points to view the site other than the A29 Lidsey Road on the approach into or out of the village from the south from which this wider residential context is clearly apparent.
90. The character of the site and immediate surroundings is therefore of settlement-edge land that could be described as semi-rural and closely related to the main settlements of Woodgate and Westergate. Indeed, the Built-up Area Boundary of Woodgate adjoins the application site along its entire eastern boundary (and runs close to the northern boundary) as delineated on the Arun Local Plan Policies Map. The strategic allocation of Local Plan Policy SD5 (known as Barnham-Eastergate-Westergate or 'BEW' for short) extends this Built-up Area Boundary some 800m further south than the application site along the eastern side of the A29 into the rural surroundings of Westergate; now and even more so in the future the area around the application site will be increasingly urbanised in character.
91. The application site does not therefore have the character of open countryside or isolated rural land consistent with the high-quality landscape areas found further out from the settlement boundary that the Local Plan seeks to protect. It is not part of the broader open spaces that are found around the periphery of the wider settlement where development is more sporadic and isolated and the difference between the built fabric of the village and the wider countryside is more apparent.
92. The LPA's Leisure and Landscape Officer, as the relevant consultee for the previous application, supported that application subject to matters of landscaping being reserved or controlled by condition.

On-site landscaping is a reserved matter in this application to be addressed through the later full application.

93. 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.
94. 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 a patchwork of urban edge land uses, contained by boundary vegetation, on upper coastal plain adjacent to existing settlement.
95. 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.
96. 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.
97. 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 dwellinghouse 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.



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

98. 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 hardstand, 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.

Local Plan Policy SO DM1 Soils

99. The LPA's Committee Report, in recommending refusal for application AL/115/17/OUT, found no substantial conflict with this policy and contradicts the Decision Notice in this regard (which included this policy in the reasons for refusal). The report at page 114 states: 'The agricultural land grade is noted. This is a relatively small area of land and the site has limited agricultural potential. It is not considered that a refusal on these grounds alone is justified.'
100. The superseded 2012 NPPF (paragraph 112) is erroneously cited. The 2018 NPPF refers to agricultural land at paragraph 170 with less emphasis than the 2012 NPPF and in the context of enhancements to the natural environment.
101. Policy SO DM1 includes an exception to allow development on agricultural land where the 'need for the development outweighs the need to protect such land in the long term'. Because Policy SO DM1 is relevant to applications for new housing development, it can be considered out-of-date when the LPA

cannot demonstrate a five-year supply of deliverable housing sites; the exception provided for in the policy wording is triggered due to a district-wide housing need.

102. Neighbourhood Plan Policy EH3 contains a similar caveat when the need for a development clearly outweighs the harm to agricultural land. The LPA's Committee Report of July 2018 attributed 'only limited weight' to Policy EH3 and in local appeal decision APP/C 3810/W /16/3155330 (paragraph 24) the Inspector confirmed that housing need can outweigh Policy EH3. Policy EH3 can also be considered out-of-date under the tests of NPPF paragraph 14.
103. There is also a qualitative case against the protection of the agricultural land at the application site given the decades-long redundancy of the former horticultural use, the contamination of the land (glass, vehicles, structures, hardstanding), the clear intention of the landowner to forfeit any future agricultural use in pursuit of residential development and a lack of contiguity with adjoining agricultural land leaving this site as an isolated and relatively small parcel. The agricultural land is therefore not worthy of retention in light of the housing need and condition of the site itself.
104. When considering agricultural land as a material consideration in the tilted balance, the LPA found in its July 2018 Committee Report (pages 35 and 38) the benefits of 55 dwellings would outweigh the harm to agriculture which carried limited weight and the loss of a small area of land is outweighed by the economic and social benefits associated with the development which attracted significant weight.

Neighbourhood Plan Policy EH1 Built Up Area Boundary

105. Policy EH1 seeks to direct new residential development to be within existing settlement boundaries and similarly to Policy C SP1, Policy EH1 is important to the determination of the application. As such, it is subject to the test of NPPF paragraph 11(d) that decision-makers should apply a presumption in favour of sustainable development and permission be granted if it is found to be out-of-date. Because the LPA cannot demonstrate a five-year supply of deliverable housing sites and the Neighbourhood Plan was made more than 2 years before the date of the application, its relevant policies are out-of-date and the tilted balance is engaged. Permission should be granted if no material considerations are found to outweigh the benefits of development.
106. In addition to the out-of-date status of Policy EH1, the LPA's July 2018 Committee Report dismissed Policy EH1 in principle by noting that the Aldingbourne Neighbourhood Development Plan was prepared on the basis of the Objectively Assessed Need identified within the Publication Version of the emerging Arun Local Plan (2015). The LPA advised that because of the significant revision of this figure between Publication and Examination/Adoption only limited weight can be attributed to policy EH1.
107. Aldingbourne Parish Council was notified by the District Council in a letter of December 2018 that it must find at least 70 net additional homes (over and above any existing permissions). This 70 house figure is the localised housing requirement for Aldingbourne Parish. The emerging Neighbourhood Plan is seeking to address this figure but for now it means the current Policy EH1 must be considered out-of-date with regards to land supply.
108. In any case, the application site is identified in the emerging Neighbourhood Plan as a development location and when allocated in the final Neighbourhood Plan Review it would be brought within the settlement boundary and be supported in principle by Policy EH1.

Neighbourhood Plan Policy H6 Windfall Sites

109. The LPA's refusal of application AL/115/17/OUT also referred to Policy H6. This policy only relates to windfall sites within the settlement boundary so is not relevant to this application.

Local Plan Policy AH SP2 Affordable Housing

110. The second reason for refusal of application AL/115/17/OUT was applied on a technical basis because the draft Section 106 planning obligation (S106) had not been completed at the date of the decision.
111. A Draft S106 planning obligation is submitted with this application.
112. Policy AH SP2 requires a minimum 30% of the total units to be affordable on sites of 11 or more units. Eighteen affordable housing units (33% of the site total) are proposed of tenure profile: 75% rent and 25% intermediate, in compliance with Policy AH SP2 although the applicant is working with the local CLT to deliver homes to meet local needs. The previous application enjoyed the support of the Council's Housing Strategy and Enabling Manager.

Local Plan Policy OSR DM1 Open Space

113. The second reason for refusal was applied on a technical basis because the draft Section 106 planning obligation (S106) had not been completed at the date of the decision.
114. A Draft S106 planning obligation is submitted with this application.
115. On-site open space will be addressed through the detailed reserved matters stage relating to appearance and landscaping and can be controlled by condition. The indicative layout plans submitted with this application show space for on-site open space in the centre of the site with a pond and communal pavilion structure. The Parish Council has indicated a preference for a contribution to off-site play equipment (rather than providing new play space on-site) so this is offered in the Draft S106 planning obligation in compliance with Policy OSR DM1.

Local Plan Policy T DM1 Sustainable Travel and Public Rights of Way

116. The second reason for refusal of application AL/115/17/OUT was applied on a technical basis because the draft Section 106 planning obligation (S106) had not been completed at the date of the decision.
117. A Draft S106 planning obligation is submitted with this application.
118. Encouraging sustainable travel as a modal choice and associated transportation infrastructure provision is addressed in the submitted draft Travel Plan and Transport Statement to meet the requirements of the County Highways Authority, previously obtaining support from this key consultee in May 2018.
119. Policy T DM1 sets four criteria for new development. The site is close to services and facilities in Westergate including a convenience store and post office 200m from the site and Aldingbourne Primary School at 420m; this demonstrates the compliance of the site with Criterion (a) of Policy T DM1.
120. In compliance with Criterion (b) the Draft S106 planning obligation secures provision of a new Bus Shelter near the site entrance, contributing to local public transport services and the draft Travel Plan

seeks to encourage sustainable transport choices for future residents and includes design-features for the site.

121. In compliance with Criteria (c) and (d) the Draft S106 planning obligation secures the widening of the pedestrian footpath along the western side of A29 Lidsey Road between the site entrance and the Prince of Wales pub to create a safe and convenient pedestrian link to the main settlement. Provision of new cycle parking infrastructure is also secured at the local convenience store to encourage use of bicycles for local journeys.
122. Financial contributions towards necessary highways infrastructure are also provided for in the Draft S106 planning obligation.
123. Highway safety, convenience and parking matters are controlled by Local Plan Policy T SP1 and Neighbourhood Plan Policies GA1 and GA3. The LPA raised no objections to the previous application on these grounds and the submitted Transport Assessment and draft Travel Plan comply with the requirements of the policy framework.

Local Plan Policy INF SP1 Infrastructure provision and implementation

124. The second reason for refusal of application AL/115/17/OUT was applied on a technical basis because the draft Section 106 planning obligation (S106) had not been completed at the date of the decision.
125. A Draft S106 planning obligation is submitted with this application.
126. Policy INF SP1 does not specify any relevant infrastructure projects or associated costs. The Arun Infrastructure Delivery Plan provides only generic references to local infrastructure requirements in Aldingbourne and only identifies general categories with no evidence of costs. It is not possible to determine from this policy what contributions are due or the legality of any request for funding in light of the CIL Regulations.
127. The application provides for infrastructure and services needed to support the development through the Draft S106 planning obligations which secures on-site provision and off-site financial contribution and works towards a comprehensive infrastructure package.

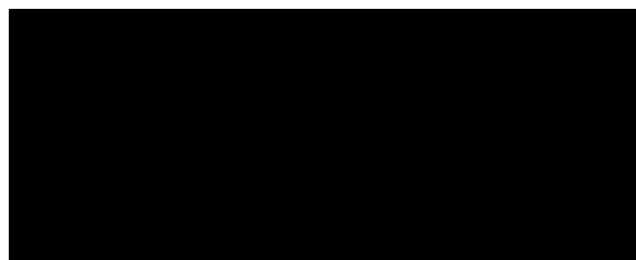
Other material considerations

128. The LPA raised no other issues in its consideration of application AL/115/17/OUT and so all other matters are considered to be accepted in planning terms. Flood risk has been addressed in the submitted evidence base; the trees subject of the Tree Preservation Orders will be retained and protected; ecology is addressed in the submitted evidence base; all other matters can be secured by condition.

Summary

129. The reasons to refuse the previous application were flawed because they relied upon out-of-date policies, provided insufficient justification or evidence and did not substantiate any actual harm to planning purposes. The current application provides additional justification to overcome those issues and should be approved without delay.
130. The site is also now allocated for housing development in the emerging Aldingbourne Neighbourhood Development Plan 2019 under 'Policy H1 2019'. The application is therefore proposed to be included within this Development Plan document, allocated within the settlement boundary as defined by Policy EH1 and Map E of the Neighbourhood Plan, and is therefore fully supported by the emerging development plan.
131. The LPA cannot demonstrate a five-year supply of deliverable housing land and so the application should be assessed on the tilted balance of material considerations and approved without delay to boost the provision of housing in Arun District which suffers from a chronic and long-standing shortfall in supply.
132. The application site is sustainable in economic, social and environmental terms. It relates well to the existing settlement boundary and is closely located to the services and facilities of Westergate. It is unconstrained and has been tested for suitability through all necessary evidence base reports, surveys and consultations.
133. The site will contribute a much-needed 55 new houses to the District and more importantly a group of 18 affordable homes to provide for local needs within Aldingbourne Parish for years to come. The applicant has engaged with the Parish Council and local Community Land Trust and is offering the ownership and management of the affordable housing to the CLT through a Draft S106 legal agreement.

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APPENDIX 1 - LPA Five Year Supply Error

LPA Stated 5 Year Supply Position

1. The LPA's latest five year supply calculation is based on the Housing Implementation Strategy Update at Appendix 3, Table 2 of that document (extracted below).

Table 2
Update to Table 9 of HIS - 5 year Housing Land Supply with the latest data for 2017 - Commitments, NP Allocations and HELAA sites all include a 10% slippage reduction

LP requirement 2017-2022 (930 x 4 + 1310 + 306 Shortfall)	5336
20% Buffer	1067
Total Requirement 2017-2022	6403
Commitments (Large Sites)	2256
Small Site Commitments	251
Windfalls	163
Made NP sites (from HELAA	320
Deliverable HELAA Sites within BUAB	207
Strategic Site/DPD Allocations	3565
Total Supply*	6762
Supply in years	5.3

2. It can be seen in the first line that the Local Plan requirement 2017-2022 is shown as 5,336 based on a stated calculation of '(930 x 4 + 1310 + 306 Shortfall)'. This represents the first five year requirement, notwithstanding that this was based in April 2017 which is more than a year out of date today.
 - a. '930 x 4' represents the requirement for the first four years of the stepped trajectory from 2017/18 - 2020/21.
 - b. '1310' represents one year of the stepped trajectory from 2020/21 - 2021/22.
 - c. '306 Shortfall' represents the deficit in supply against the past requirement from 2011/12 - 2016/17.
3. This requirement figure clearly relied upon an annualised figure of '930' for the first four years but should in fact have been 1,120, which rendered the five year housing requirement incorrect.

Erroneous use of 930 dpa as annualised requirement

4. The '930' annualised requirement figure originated from the March 2017 Proposed Modifications Local Plan and was also used in the Housing Implementation Strategy April 2017 and its Update in September 2017 which formed the basis of LPA's five year supply calculation as extracted above. The March 2017 Proposed Modifications Local Plan policy wording is extracted below for ease of reference.

Policy H SP1

Housing Allocation

Within the plan period 2011 – 2031 the Council will provide for 20,000 new homes through the Local Plan.

The phased housing requirements and future supply for the District are as follows:

<i>Requirements for net additional homes</i>	2011-15	2016-20	2021-25	2026-31	2011-31
Dwellings per annum	610	930*	1,310	960	
Total	3,050	5,600	6,550	4,800	20,000

Table 12.2

*this is a 6 year target to allow for the 5 year housing land supply calculation

Additional allocations for small sites will be made across the District through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans. If necessary, the Council will commence the production of a Small Sites Development Plan Document three years after the adoption of the Local Plan in order to allocate additional small sites in order to meet the requirements of the Plan.

Proposed Modification Local Plan March 2017

5. The five year requirement for '2016-20' (sic)(it should in fact have read '2016-21' and was corrected in later versions) was 5,600 houses. The 930 figure shown in the dwellings-per-annum row includes an asterisk with footnote: _ *a 6 year target to allow for the 5 year housing land supply calculation: . The true annualised figure for this five year period would have been 5,600/5=1,120.
6. The LPA's Post-Hearing Main Modifications 2017 Schedule at 'MM 25' confirmed the deletion of this '6 year supply' reference in Policy H SP1: Table 12.2 as shown below.

Delete the footnote under Table 12.2 which refers to a 6 year period:-

~~"*this is a 6 year target to allow for the 5 year housing land supply calculation"~~

Local Plan Inspector's Report Main Modification MM25

7. In the final version of the Local Plan, the LPA deleted the footnote but failed to amend the 930 figure to 1,120 accordingly, or remove the asterisk. The LPA also failed to replace the 930 figure in its five year supply calculations in the Housing Implementation Strategy Update (which post-dated the Main Modifications document) with the corrected 1,120.
8. The 930 figure was therefore erroneously included in the adopted Local Plan, published online in July 2018 (extracted below for ease of reference) and continued to be relied upon in its five year supply calculation.

Policy H SP1

The Housing Requirement

Within the plan period 2011 – 2031 at least 20,000 new homes will be accommodated in the District.

Delivery will be phased over the Plan period as follows:

Requirements for net additional homes	2011/12- 2015/16	2016/17- 2021/21	2021/22- 25/26	2026/27- 2030/31	2011/12- 2030/31
Dwellings per annum	810	930*	1,310	960	
Total	3,050	5,600	6,550	4,800	20,000

Table 12.2

Adopted Local Plan ' July 2018 version in force at date of application decision

9. The error is clear in the July 2018 version of the adopted Local Plan as the asterisk is still in place at '930*' with no footnote relating to it, and the total dwellings per annum of that 5 year period is 5,600, yet $5,600/5=1,120$.
10. The Arun Local Plan and the LPA's five year supply calculator still rely on the 930 figure (not the corrected 1,120 figure) to generate the latest published 5.3-year supply which clearly incorporates an erroneous statistic.

Consequence of using erroneous 930 annualised requirement figure

11. The consequence of using 930 as the annualised requirement for the stepped Trajectory years 2016/17 to 2020/21 is that the overall requirement from this period is 4,650 (930×5), lower than the actual requirement of 5,600. Using a lower requirement figure artificially improves the LPA's housing supply position when tested against that requirement.

12. The nature of a 'stepped trajectory' requires the Local Plan housing supply calculator to use annualised requirement figures for individual years (i.e. 930) rather than sum-totals for five-year periods (i.e. 5,600) which are more common in traditional trajectories. Because of this, the erroneous individual year requirement (930) has been used repeatedly rather than the correct period total (5,600). This error will persist in all future and past requirement calculations until the annualised figure is corrected through a revised Local Plan housing supply calculator.
13. The LPA's actual housing supply calculator is replicated (below left) alongside a corrected calculator with the accurate requirement figure (below right) for comparison.

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14. Correcting this figure, the Council by its own calculations has a 4.6-year supply (notwithstanding further errors addressed in the above Statement). For example, the shortfall will consequently be higher because the requirement for 2016/17 should have been 1,120 instead of 930, raising the 360 shortfall figure to 550 leading to a 4.4 year supply etc.

LPA Acknowledgement of Error

15. The LPA has not publicly acknowledged this error nor amended its five year supply calculator nor corrected its five year housing land supply position.
16. However, at some point since August 2018, the LPA updated its Local Plan online to a newer version which includes the corrected annualised requirement figure of 1,120 (extracted below for ease of reference). This proves that the LPA is aware of the error however it has not acted to correct its housing land supply calculator which remains incorrect.

Policy H SP1

The Housing Requirement

Within the plan period 2011 – 2031 at least 20,000 new homes will be accommodated in the District.

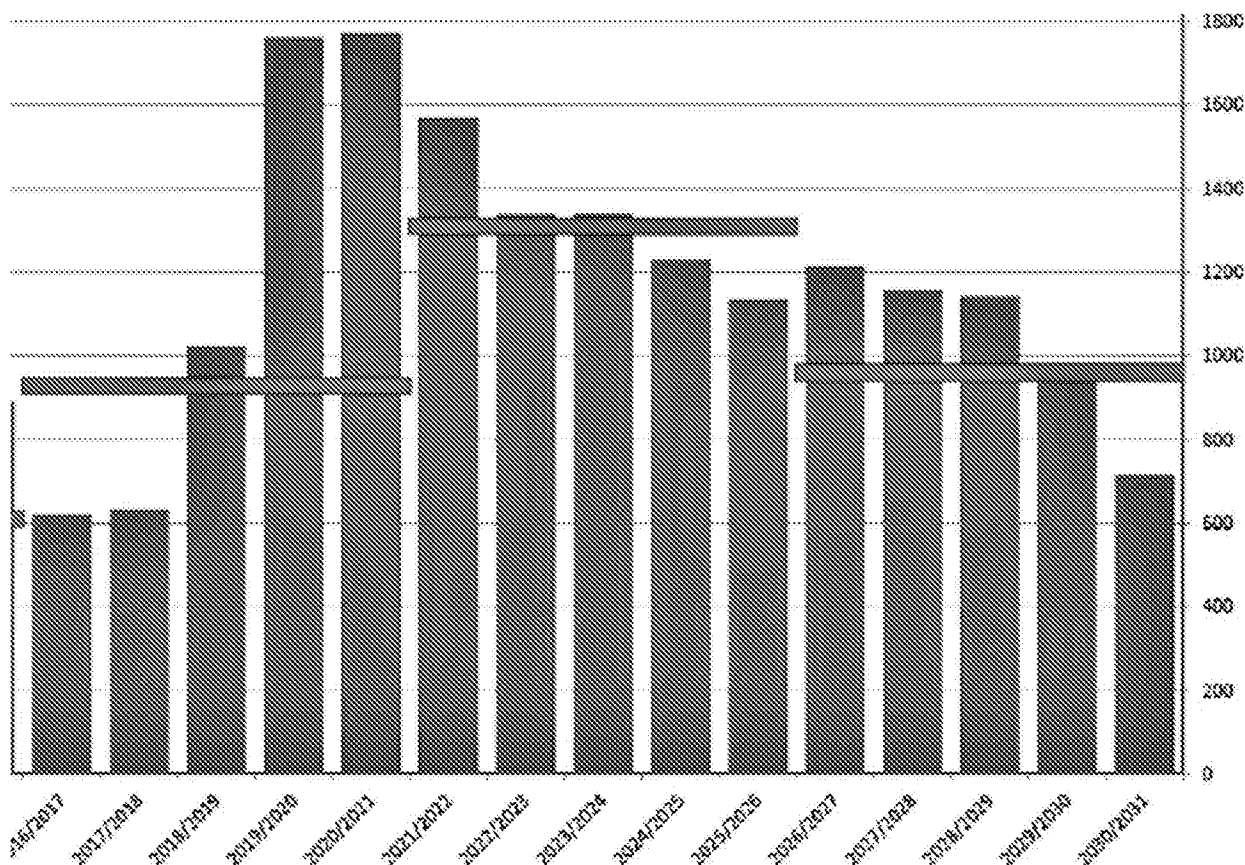
Delivery will be phased over the Plan period as follows:

<i>Requirements for net additional homes</i>	2011/12-2015/16	2016/17-2020/21	2021/22-2025/26	2026/27-2030/31	2011/12-2030/31
Dwellings per annum	610	1,120	1,310	960	
Total	3,050	5,600	6,550	4,800	20,000

Table 12.2

Adopted Local Plan ' corrected version, date published online unknown (post-August 2018)

17. It should be noted that the graphical Trajectory at Picture 12.1 of the Local Plan is still incorrect, showing the average requirement for 2016 to 2021 by way of a 'red bar' at 930 dpa:



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