

Land at SRC Recycling, Fontwell Avenue, Eastergate

Planning Statement

Boyer

Prepared on behalf of SRC Recycling Ltd | March 2022

Report Control

Project:	Land at SRC Recycling, Fordwell Avenue, Eastergate
Client:	SRC Recycling Ltd
Reference:	20.1041
File Origin:	https://rgpcuk.sharepoint.com/sites/BoyerProjects2020/wokingham/20.1041/4 Boyer Planning/4.02 Reports/Planning Application/Planning Statement/2020221 SRC Recycling Planning Statement- VC.docx
Primary Author:	HB/AS/LA
Checked By:	MO

Issue	Date	Status	Checked By
1	07/04/2022	Final	MO

TABLE OF CONTENTS

1. Introduction	2
2. Site and Surrounding Area	4
3. Proposed Development	8
4. Planning Policy Context	11
5. Planning Considerations	24
6. Affordable Housing Statement	40
7. Draft Heads of Terms	42
8. Summary and Conclusions	43

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of SRC Recycling Ltd ('the Applicant') in support of a Full Planning Application which has been submitted to Arun District Council (ADC) in relation to Land at SRC Recycling, Fontwell Avenue, Eastergate, Chichester ('the site').
- 1.2 SRC Recycling Ltd is a local waste and recycling business that has operated from the site at Fontwell Avenue for over 30 years. The business started as a small recovery firm, but has since expanded their services to include vehicle breaking and recycling, and the storage and sale of vehicle parts. The operation serviced from the site has been successful, profitable and a committed local employer. However, over recent years, the site has become unfit to serve the purpose required, and does not have the capacity to expand and accommodate the new technologies required to support the business moving forwards. As such, the business is in decline and is no longer profitable and viable in its current location. SRC Recycling Ltd are therefore considering relocating their business and redeveloping the site at Fontwell Avenue to help meet local housing needs.
- 1.3 The redevelopment of the site presents a valuable opportunity to heal this part of the local landscape and integrate the site in the evolving built fabric of the area. The Applicant's vision is to leave a positive legacy of their business by creating a green, walkable, connected and high quality extension to the established Eastergate community.

Description of Development

- 1.4 The planning application seeks full planning permission for a new mixed use residential and co-working hub development on the site. The description of development, as set out on the accompanying application form, is as follows:

"Full planning application for the redevelopment of the existing car salvage and recycling facility to provide 80 dwellings and a co-working hub, with vehicular access from Fontwell Avenue, and the provision of public open space, landscaping, and other associated works, following the demolition of all existing buildings and structures".

Accompanying Documentation

- 1.5 This submission is accompanied by a number of drawings and reports, which demonstrate that the proposals comply with planning policies.
- 1.6 The documents and drawings which accompany this planning application are set out in the accompanying covering letter.

Structure of this Planning Statement

- 1.7 The Planning Statement deals with the proposals in the context of Government advice and the development plan. The relevant policy documents are assessed in **Section 5** of this Statement.

1.8 This Planning Statement is structured as follows:

- **Section 2** sets out the context for the proposed development, including a description of the site, its surroundings and relevant planning history;
- **Section 3** provides a description of the proposed development and an overview of pre-application discussions with ADC;
- **Section 4** provides an overview of national and local planning policy and guidance considered relevant to determination of the application;
- **Section 5** provides an assessment of the proposed development against the identified planning policy framework and regulations;
- **Section 6** sets out the affordable housing statement;
- **Section 7** provides the Planning Obligations Statement and Draft Heads of Terms; and
- **Section 8** provides a summary of the application and the planning benefits of the scheme.

2. SITE AND SURROUNDING AREA

Site Context

- 2.1 The site is situated on the northern edge of the village of Eastergate, a parish located in the Arun district of West Sussex. The village is located approximately 6 miles east of Chichester, and 5 miles west of Arundel. The entire site measures approximately 3.27 hectares, and is rectilinear in shape.
- 2.2 The site currently comprises SRC Recycling, a car salvage and recycling facility which primarily provides vehicle breaking services, as well as the storage and sale of vehicles and parts.
- 2.3 The processes undertaken at the site mainly comprise the depollution, dismantlement, and destruction of vehicles. This involves the removal and safe treatment of all hazardous materials and components; depolluting various parts of the vehicles including the fuel, coolants, antifreeze, oils, batteries and elements containing mercury and explosives (such as the airbags); and salvaging parts and components which can then be cleaned, checked and stored ready for re-use. The remaining metal shell is then crushed and ready to be moved off-site to a metal mill for reprocessing.
- 2.4 Given the nature of the existing car salvage use and operations, the site is a brownfield site which is out of character with the surrounding landscape and townscape.
- 2.5 The western portion of the site comprises an overgrown vegetated area. This part of the site is predominantly used as overflow storage of vehicles of varying types. The eastern part of the site is where the majority of the built form is concentrated and where the main function of the business is focused, with large areas of hardstanding containing a 2-storey office block, 2 large workshops (comprising the engine removal building and the decontamination building), and several containers and stores/sheds.
- 2.6 The site can be accessed from a single entrance onto Fontwell Avenue (A29), which links the site to Eastergate and the adjacent village of Westergate.
- 2.7 The site is relatively level across the whole site, with some existing boundary trees and hedgerows. The site sits within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding.
- 2.8 The site is also within 12km of the Singleton and Cocking Tunnels Special Area of Conservation (SAC).
- 2.9 The site is near to, but not within, the Eastergate Square Conservation Area which lies to the south of the site, but has no impact on its designation. There are also a number of listed buildings within Eastergate, the closest being the Grade II Argyll House, The Long House and the Eastergate War Memorial. All of these are approximately 0.2km from the site. The proposed development would not cause any harm to their setting due to existing built form and vegetation, which lies between as discussed further in **Section 5**.

- 2.10 Immediately west and south west of the site is a new residential development on the former Nyston Nursery site. In February 2015, outline planning permission was secured on appeal (Ref. APP/C3810/A/14/2217385) for the demolition of the existing structures and the erection of 268 dwellings (now known as 'The Hedgerows').
- 2.11 A densely populated field of trees (part of Fontwell Farm) sits directly to the north of the site with dwellings and a light industrial unit adjacent to the east of the site. Access to The Hedgerows development sits to the south of the site.
- 2.12 The site is in a highly sustainable location and close to the amenities of Westergate and Eastergate. Eastergate is located approximately a 6 minute walk from the site and the centre of Westergate is a 13 minute walk. Services within these two villages include a post office, a doctor's surgery, children's nursery, a Church, primary and secondary school, sports centre and a convenience store.
- 2.13 Bus stops are located within 60 metres to the entrance of the site, which serve the 85 and 658 bus routes, providing frequent services to Arundel and Chichester.
- 2.14 The nearest train station is located 2.2km away in Barnham, which can be accessed from the site via the 85 bus route, and is an approximate 7 minute cycle. The train station provides direct routes to Brighton, Southampton and London.

Relevant Planning History

- 2.15 The site has no relevant planning history, however there have been recent applications for surrounding residential developments immediately to the west and south of the application site which are of relevance. These are detailed below:

AL/61/13/OUT - Land at Nyton Road and Northfields Land and Land off Fontwell Avenue, Aldingbourne

- 2.16 An outline application with some matters reserved was allowed on appeal in February 2015 for the following:

"Demolition of existing glasshouses, bungalow, stables & outbuildings & residential development of 268 dwellings incl 30% affordable housing (incorporating 60 senior living units) with associated access, public open space & landscaping".

- 2.17 Reserved Matters (Ref. AL/102/17/RES) was subsequently approved for the above development in December 2017.
- 2.18 As discussed in further detail below, the Council in their initial recommendation, and the Inspector in the planning appeal for the above scheme concluded that, although sited within a countryside location, the site was in a sustainable location and that proposals for housing would not result in significant adverse impacts on the visual amenity or character of the area. This scheme has ultimately helped the area and landscape to evolve, resulting in the application site being sited more as an edge of settlement site, primarily surrounded by residential development, than its previous more semi-rural location.

BN/50/20/PL- Land west of Fontwell Avenue, Eastergate

- 2.19 Full planning permission was granted in January 2021 for the following development, which sits further north from the application site:

“Demolition of existing structures on-site & erection of 42 No. dwellings with access, parking, landscaping & associated works”.

- 2.20 This scheme further supports the evolution of the character and landscape of this area, resulting in the car salvage centre becoming more ‘at odds’ and out of place with its surroundings.

Pre-Application Advice

- 2.21 As part of the preparation process for the planning application, the Applicant has engaged in pre-application discussions with Officers from ADC.

June 2020 Submission (Ref. PAA/60/20)

- 2.22 In June 2020, an initial pre-application request was submitted to ADC relating to proposed new residential development comprising 91 dwellings, delivered in two phases (Phase 1 proposing 59 dwellings, and Phase 2 proposing 32 dwellings).
- 2.23 ADC’s written response confirmed that whilst the site lies outside of the Built-Up Area Boundary, the proposal would have clear social and economic benefits, and the site would be in a sustainable location. It advised that the whilst the principle of development on the site is contrary to the adopted policies in the Development Plan in the first instance, the weight afforded to these policies is reduced due to the Council not being able to demonstrate an adequate supply of housing land.
- 2.24 The response also noted that it is material that the site at Nyton Nursery already benefits from planning permission (Ref. AL/61/13/OUT and AL/102/17/RES) for 268 dwellings, with the majority of the scheme now built out, which has amended the character of the area, resulting in this site being considered edge of settlement.
- 2.25 ADC also provided advice regarding technical and design points which could be amended to further improve the scheme. Please see **Section 5** and the accompanying suite of technical documents which demonstrate how the proposals evolved and subsequently comply with appropriate policy.

June 2021 Submission (Ref. PAA/40/21)

- 2.26 A further pre-application request was submitted in March 2021 which sought to build upon the initial proposals, evolving the scheme so that it provided a more robust and structured development framework which responded to comments raised during the first pre-application submission. This included removing the loop access from near to the existing properties at Oaktrees; and re-siting the Public Open Space so that it sits more centrally within the scheme.

2.27 A written response to a formal pre-application advice request was received on the 3 June 2021. Officers noted that the following matters should be incorporated as part of any future planning application:

- Loss of existing waste facility and employment premises will need to be justified as part of the planning application;
- The proposals should maintain a high quality standard of design throughout the planning and development process, especially in view of the nearby Conservation Area and heritage assets;
- A Noise Impact Assessment should be included to ensure the background noise levels are representative and that noise mitigation measures are proposed where needed, to ensure future occupants have acceptable noise levels internally and externally;
- The scheme needs to ensure it provides an appropriate level of car parking in line with standards;
- Confirmation of the amount of Public Open Space to be provided on-site;
- Detailed Landscaping Scheme should be included to show how vegetative screening will soften the impact of the proposals in this rural fringe setting and in views out of the Conservation Area;
- The layout should ensure that cycle/pathways link within and beyond the site; and
- The scheme should ensure that it delivers a Net Gain in Biodiversity, alongside any necessary ecological mitigation proposals.

3. PROPOSED DEVELOPMENT

- 3.1 This full planning application seeks planning permission for:

“Full planning application for the redevelopment of the existing car salvage and recycling facility to provide 80 dwellings and a co-working hub, with vehicular access from Fontwell Avenue, and the provision of public open space, landscaping, and other associated works, following the demolition of all existing buildings and structures”

- 3.2 The proposed housing will range in size from 1 to 4 bedroom dwellings and would meet a range of community housing needs and provide a range of dwelling types, sizes and tenures in accordance with the requirements of the local area.
- 3.3 The housing mix for the proposed development is summarised in Table 1 below:

Table 1: Proposed Housing Mix

Tenure	Type	Bedrooms	No.	Sub-Total
Market	Apartment	1 bed	3	56
	Apartment	2 beds	2	
	House	2 beds	22	
	House	3 beds	21	
	House	4 beds	8	
Affordable	Apartment	1 bed	8	24
	Apartment	2 beds	8	
	House	2 bed	2	
	House	3 bed	5	
	House	4 bed	1	
Total			80	80

- 3.4 The proposed layout provides a range of house types and sizes located throughout the site, with a Public Open Space located centrally, within Local Areas of Play (LAPs) located within the eastern and northern part of the site. The quantum of play areas and open space accord with ADC's planning policy requirements.
- 3.5 In accordance with Policy H4 of the Aldingbourne Neighbourhood Plan 2 and Policy AH SP2 of the Local Plan, 30% (24) of the dwellings across the development will be affordable,

of which 18 will be Affordable Rent, and 6 will be Intermediate Housing, which represents a 75% / 25% tenure split as required by ADC. The affordable dwellings are dispersed throughout the site and would be tenure blind.

- 3.6 The appearance of the proposed dwellings reflect the residential vernacular and historic characteristics of Eastergate. The proposed scheme uses a range of materials, architectural features and detailing which are found locally in Eastergate. Materials for the development will include brick and flint, with dogtooth brick detailing, in a variety of colours to reflect variation seen within the village.
- 3.7 The proposed development will primarily be 2 storeys in height with some having accommodation in the roof (2.5 storeys), which is in keeping with the existing character of the surrounding area. Throughout the scheme, a gable roof form is primarily used, with some hipped roofs to the rear of the site.
- 3.8 The proposed development will be of an extremely high quality and will make a positive contribution to the character of the settlement.
- 3.9 The scheme also includes the provision of a co-working hub, a two storey building which would provide flexible office space, with dedicated car parking. The building would be available for use by the new residents of the scheme, and the existing wider community of Eastergate and Westergate. Following the shift in working patterns in recent years (largely owing to the Covid-19 pandemic), the co-working hub will provide a key, flexible space for residents who may want to work remotely.
- 3.10 The site is currently accessed via Fontwell Avenue. The proposed development would retain the current access, which would be upgraded to include a priority junction with a restricted movement operation. The junction would allow left-in access and all-movement egress. These enhancements works are discussed in further detail in the accompanying Transport Assessment.
- 3.11 In terms of car parking provision for the development, the proposed layout provides 196 parking spaces. This comprises 169 allocated spaces, 17 (20%) visitor spaces (including 5% disabled spaces), 8 spaces for the co-working hub, and 2 parking spaces for the sub-stations. This accords with ADC's parking standards. All of the parking spaces for both the houses and apartments will be provided with electric vehicle charging points, in line with Part L of the Building Regulations.
- 3.12 Cycle parking is provided throughout the development in the form of 131 cycle parking spaces. These will be located in sheltered and secure spaces within the rear gardens associated with each of the dwellings, and secure communal cycle stores for the apartments.
- 3.13 A pedestrian footpath is provided from Fontwell Avenue along the development access into the site, with pedestrian footpaths linking around the internal site, creating a number of routes and connections within the site and the wider area. A refuse access and route has been outlined for the proposed development in line with policy standards.

- 3.14 Landscaping is proposed throughout the site to ensure that the new development sits within the existing landscape structure. Existing boundary trees and hedgerows will be largely retained wherever possible, and additional trees will be planted across the development and boundaries to minimise views from adjacent residential properties. The open spaces will include trees and planting which will provide a pleasant outlook for properties and communal areas of open space, as well as contribute to the biodiversity net gain on site. In addition to this, a Locally Equipped Area of Play (LEAP) is to be provided within the centre of the site, and two Local Areas of Play (LAPs) have been incorporated within the eastern and western parts of the scheme.
- 3.15 Each dwelling will have access to appropriate amenity space, provided in the form of communal spaces for the apartment blocks, and private residential amenity spaces for the dwellings, in line with policy requirements. A large number of the plots will also benefit from south facing gardens to maximise the levels of sunlight and daylight.
- 3.16 The development has been designed in accordance with the parameters and principles as described in the Development Plan and pre-application responses, with further details set out in the accompanying Design and Access Statement prepared by Offset Architects.

4. PLANNING POLICY CONTEXT

- 4.1 This section provides a summary of the relevant planning policy framework against which the planning application will be determined.
- 4.2 Section 38 of the Planning Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.3 The development plan for ADC relevant to this application currently comprises the Arun Local Plan (2018); West Sussex Waste Local Plan (2014); and the Aldingbourne Neighbourhood Plan (2021).
- 4.4 Following the adoption of the Arun Local Plan, Aldingbourne Parish Council were committed to reviewing their Neighbourhood Plan in order to support the District's objective of finding more appropriate land for housing up to 2031. The revised Neighbourhood Plan was adopted in July 2021.
- 4.5 ADC are currently undertaking a Local Plan Review in order to develop a new planning framework to improve the level of sustainability and infrastructure across the District, as well as revising the existing development management policies. Due to the early stage of the Review it carries no material weight in decision making.
- 4.6 The National Planning Policy Framework (2021) and Planning Policy Guidance (PPG), are also relevant material considerations.

Local Planning Policy

- 4.7 Local planning policies from the statutory development plan which are considered to be relevant to the determination of this planning application include:

Arun District Local Plan 2011-2031

- 4.8 **Policy SD SP1 Sustainable Development:** when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.
- 4.9 **Policy SD SP2 Built – Up Area Boundary:** Built Up Area Boundaries are defined for the main towns and villages in the district. Development should be focused within the Built-Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.
- 4.10 **Policy C SP1 Countryside:** Outside of the Built- Up Area Boundary land will be defined as countryside and will be recognised for its intrinsic character and beauty.
- 4.11 **Policy LAN DM1- Protection of Landscape Character:** Development throughout the plan area should respect the particular characteristics and natural features of the relevant

landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas.

- 4.12 **Policy EMP DM1 – Employment Land: Development Management:** Existing employment sites and premises will be protected where there remains a reasonable prospect of employment use. Change of use from Business Class or similar sui generis use will not be permitted unless:
- It is demonstrated that the site is no longer required and is unlikely to be re-used or re-developed for industrial/ commercial purposes. This should include clear demonstration of marketing, viability appraisal and the suitability of the site to accommodate the proposed use – using a methodology to be agreed by the District Council at pre- application advice stage; or
 - The existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved.
- 4.13 **Policy H SP1- The Housing Requirement:** Within the plan period 2011-2031 at least 20,000 new homes will be accommodated in the District. Additional non- strategic allocations will be made across the District through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans.
- 4.14 **Policy H DM1- Housing mix:** The Council will seek a mix of dwelling types and sizes, to include affordable housing units which adhere to the latest Homes and Community Agency design guidance. For development of 11 units or more the Council shall require a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations.
- 4.15 **Policy AH SP2 – Affordable Housing:** For all developments of 11 residential units or more the Council will require a minimum 30% of the total number of units proposed on site to be provided as affordable housing on site. The Council will negotiate the affordable housing tenure mix on development sites from an initial position of 75% rent and 25% intermediate housing.
- 4.16 **Policy D SP1- Design:** All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.
- 4.17 **Policy D DM1- Aspects of form and design quality:** when considering any application for development the Council will have regard to the following aspects: Character; appearance/ attractiveness; impact; innovation; adaptability; crime prevention; trees and woodlands; solar gain; public realm; movement; legibility; public art; density; aspects of form and design quality.
- 4.18 **Policy D DM2- Internal space standards:** The planning authority will require internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs.

4.19 Policy ECC SP1- Adapting to climate change: The Council will support development which is located and appropriately designed to adapt to impacts arising from climate change. In order to achieve this, development must be designed to take account of the following issues:

- Location (in relation to flood risk and vulnerability to coastal erosion);
- Water efficiency;
- Shade, cooling, ventilation, solar gain;
- Connectivity to the green infrastructure network;
- Layout and massing;
- Resilience of buildings and building materials to extreme weather events; and
- Capacity of drainage systems and incorporation of SuDS.

4.20 Policy ECC SP2- Energy and climate change mitigation: All new residential and commercial development will be expected to be energy efficient and to demonstrate how they will:

- Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;
- Use design and layout to promote energy efficiency; and
- Incorporate decentralised, renewable energy systems such as solar panels.

4.21 All major developments must produce 10% of the total predicted energy requirements for renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable.

4.22 Policy OSR DM1 Open Space, Sport & Recreation: Housing development will be required to contribute towards:

- Open space provision;
- Playing pitch provision in accordance with guidance set out in the Playing Pitch Strategy; and
- Indoor sports and leisure facilities through financial contributions.

4.23 Policy T SP1- Transport and Development: The Council will support development which is designed to reduce the need to travel by car by identifying opportunities to improve access to public transport services and passenger transport services whilst making provision for safe access to the highway network through improvements to the existing road network and the promotion of vehicles which use low-carbon energy.

4.24 Policy T DM1- Sustainable Travel and Public Rights of Way: New development must ensure ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and access to public transport and community transport services where a need has been identified.

4.25 Policy ENV SP1- Natural Environment: Arun District Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural

environmental through the development process and particularly through policies for the protection of both designated and non- designated sites.

- 4.26 **Policy ENV DM4- Protection of trees:** Proper provision must be made for the protection and management of trees or areas of woodland on-site when undertaking development. A management plan shall be provided as part of a planning application in accordance with BS 5837 (2012) in order to ensure that trees are adequately protected during development and appropriately maintained in the future.

- 4.27 **Policy ENV DM5- Development and biodiversity:** Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats.

- 4.28 **Policy W SP1- Water:** The Council will encourage water efficiency measures in order to protect the District's water resource and enhance the quality of the water environment which supports a range of habitats and ecosystems. Development will be encouraged to make active use of surface water as a design feature and permitted where it identifies measures to improve and enhance waterbodies, coastal habitats or provides additional flood relief.

- 4.29 **Policy W DM1- Water Supply and Quality:** Development will be permitted where water supplies can be provided prior to occupation and provisions of a water supply is not considered detrimental to existing abstractions, river flows, water quality, fisheries, amenity or nature conservation.

- 4.30 **Policy W DM2 - Flood Risk:** All development proposals must take account of relevant Surface Water Management Plans, Catchment Flood Management Plans and related Flood Defence Plans and strategies such as the Lower Tidal River Arun Strategy.

- 4.31 **Policy W DM3 - Sustainable Urban Drainage Systems:** All development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS), appropriate to the size of development.

- 4.32 **Policy WM DM1 - Waste Management:** New residential development will need to be designed to ensure that kerbside collection is possible for waste vehicles, and where appropriate, communal recycling bins and safe storage areas will be incorporated for flatted developments.

- 4.33 The Policy also notes that in accordance with the West Sussex Waste Local Plan, there will be a general presumption against any development which may harm or prejudice the operation of existing and allocated waste facilities and infrastructure.

- 4.34 **Policy QE SP1- Quality of the Environment:** The Council requires that all development contributes positively to the quality of the environment and will ensure that the development does not have a significantly negative impact upon residential amenity, the natural

environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

- 4.35 **Policy QE DM1 - Noise Pollution:** Residential development likely to experience noise from road, rail or air must be supported by a noise assessment and be designed to ensure that residents will not be adversely affected by noise.
- 4.36 **Policy QE DM2- Light Pollution:** Planning permission for proposals which involve outdoor lighting must be accompanied by a lighting scheme prepared according to the latest national design guidance and relevant British Standards publications.
- 4.37 **Policy QE DM3- Air Pollution:** All major development proposals will be required to assess the likely impact of the development on air quality and mitigate any negative impacts.
- 4.38 **Policy QE DM4- Contaminated Land:** The Council promotes, and will permit, the use of previously developed land and the remediation of contaminated land to ensure that land is brought back into use. Prior to any development, the Council will require evidence to show that unacceptable risk from contamination will be successfully addressed through remediation without undue environmental impact during and following the development.
- 4.39 **Policy INF SP1- Infrastructure Provisions and Implementation:** LPA will support development proposals which provide or contribute towards the infrastructure and services needed to support development to meet the needs of occupiers and users of the development and the existing community.

West Sussex Waste Local Plan 2014

- 4.40 **Policy W2 – Safeguarding Waste Management Sites and Infrastructure:** Development that would prevent or prejudice the use of existing waste management sites or infrastructure that make an important contribution to the transfer of waste will not be permitted unless:
- a) the current use is temporary and the site or infrastructure is unsuitable for continued waste use;
 - b) continued use of the site or infrastructure for waste management purposes would be unacceptable in terms of its impact on local communities and/or the environment;
 - c) redevelopment of the site or loss of the infrastructure would form part of a strategy or scheme that has wider social and/or economic benefits that clearly outweigh the retention of the site or the infrastructure for waste use; or
 - d) a suitable replacement site or infrastructure has been identified and permitted.
- 4.41 **Policy W23 – Waste Management within Development:** Proposals for development will be permitted provided that the waste generated during construction, demolition and excavation is minimised and that opportunities for re-using and recycling of waste are

maximised; and waste management facilities of an appropriate type and scale are an integral part of the development.

Aldingbourne Neighbourhood Plan 2021

- 4.42 Relevant planning policies from the revised Aldingbourne Neighbourhood Plan to this application are set out below.
- 4.43 **Policy H2 Housing Mix:** Proposals for new housing must deliver a range of house types, sizes and tenures. Applicants should demonstrate how the proposal will meet local needs. Proposals where at least 25% of dwellings meet Lifetime Home Standards, or its equivalent, will be supported.
- 4.44 **Policy H3 Housing Density:** The density of new developments shall be appropriate to its location by virtue of size, siting and relationship to existing properties.
- 4.45 **Policy H4 Affordable Housing:** Any proposal for 10 or more new dwellings should include 30% affordable units. The size and tenure of affordable units should reflect latest available housing needs evidence.
- 4.46 **Policy H7 Development in the vicinity of businesses:** Proposals for development in the vicinity of businesses which are inherently noisy will not be supported.
- 4.47 **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.
- 4.48 **Policy H9 Attention to detail:** The following items must be considered early in the design process and integrated into the overall scheme:
- Bin stores and recycling facilities
 - Cycle stores
 - Meter boxes
 - Lighting
 - Flues and ventilation
- 4.49 **Policy EH4 Protection of Watercourses:** Supports river catchment management, wildlife conservation and flood risk.
- 4.50 **Policy EH5 Surface Water Management:** Development in flood risk areas will not be supported unless it is supported by a site-specific Flood Risk Assessment.
- 4.51 **Policy EH6 Protection of Trees and Hedgerows:** Development that damages or results in the loss of trees of arboricultural and amenity value or loss of hedgerows and/or priority habitat, or which significantly damages ecological networks will be resisted, unless the need for, and benefits of, development in that location clearly outweigh the loss.
- 4.52 **Policy EH7 Renewable and Low Carbon Energy:** Proposals for energy generating infrastructure using renewable or low carbon energy sources will be supported.

4.53 Policy GA1 Promoting Sustainable Movement: Development proposals that increase travel demand will be supported where they can demonstrate that they extend or improve walking and cycling routes; they are located in places accessible to public and community transport or can improve the accessibility of the site to public and community transport by contributing to the provision of enhanced services; and they do not result in the loss of any existing footpaths or cycle paths.

4.54 Policy GA3 Parking and New Development: Proposals must provide adequate parking in accordance with the standards adopted at the time. Proposals that would result in a loss of parking spaces either on or off street will be resisted.

Other Relevant Documents

4.55 In addition to the above the following Supplementary Planning Documents (SPDs) are considered to be of relevance:

Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD (2020)

4.56 The Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD sets out a series of steps to calculate contributions towards Open Space, Playing Pitch and Indoor and Built Sport Facilities, in terms of quantity of land and or financial contributions and thresholds for on-site and off-site provision.

4.57 The SPD provides the following guidelines for the different types of open spaces which should be provided as part of developments:

Table 2: Quantity Guidelines, Type of Contribution Guidelines and Proposed Provision

Typology	Sq M. per 1,000 populations	Requirement for on-site / off-site	Required Amount for Scheme (sq m)	Proposed Provision (sq m)
Parks and Gardens	8,000	On-site	1408	2705 On-site
Amenity Greenspace	6,000	On-site	1056	
Natural and Semi-Natural	18,000	On-site	3168	3526 On-site
LAPs and LEAPs	2,500	On-site	440	605.7 On-site
Other outdoor provision (e.g. NEAPs / MUGAs / skateboard parks)	3,000	Off-site contribution (secured via CIL)	528	CIL contributions

Allotments	2,500	Off-site contribution (secured via CIL)	440	CIL contributions
------------	-------	--	-----	-------------------

Parking Standards Supplementary Planning Document (2020)

- 4.58 The Parking Standards SPD outlines the following guidance on parking standards within the Local Authority.
- 4.59 **Principle 1:** Parking provision should be efficient to accommodate demand whilst exploring the potential for sustainable travel, minimizing adverse effects on road safety and avoiding increased on-street parking demand.
- 4.60 **Principle 3:** 'Active' charging points for electric vehicles shall be provided at a minimum of 20% (at 2019 levels of provision) of all parking spaces with ducting provided at all remaining spaces where appropriate to provide 'passive' provision for these spaces to be upgraded in future.
- 4.61 **Principle 6:** Detailed consideration needs to be given to the following:
- If garages are provided, they must be at least 6m x 3m internally. If garages meet this requirement they will be regarded as an allocated parking space of 0.5 but a car port or a parking space of this dimension would count as 1 parking space.
 - Adequate visitor parking is required influenced by the level of unallocated parking.
 - Minimum standard of cycle provision is set out in **Table 3** below:

Table 3: Cycle Parking Standards

No. of Bedrooms	Cycle Provision
1 – 2 bedroom dwelling	1 space
3+ bedroom dwelling	2 spaces
1 – 2 bedroom apartment	1 space
3+ bedroom apartment	1 space

- 4.62 **Residential Parking Guidance:** Expected level of provision for new residential developments is set out at **Table 4** below:

Table 4: Car Parking Standards

No. of Bedrooms	Car Parking Provision
1 – 2 bedroom dwelling	2 spaces
3+ bedroom dwelling	3 spaces

- 4.63 Visitor parking will be required to be provided at a ratio of 20% of the total number of residential units.

Arun District Design Guide SPD (2021)

- 4.64 The Design Guide SPD provides direction on how good design is to be achieved throughout Arun, in order that the future urban form and townscape are developed in a holistic manner that makes the best of the opportunities that the District has to offer.
- 4.65 The SPD contains a number of design policies which will be the key mechanisms to deliver design quality in the District. Key principles contained within the SPD are summarised below:
- 4.66 **D.01 - Design Rationale:** The scheme must ensure that it follows the below principles:
- Defines centralities and focal points, and establishes desire lines and a clear hierarchy of streets and spaces;
 - Responds positively to the character, scale, form and massing of the surrounding natural and built environment;
 - Creates connections with the site's surroundings, promoting integration and permeability;
 - Enhances ease of movement and accessibility throughout the site, encouraging the use of diverse ways of movement and means of transport, while ensuring safe, attractive and inviting connections with surroundings;
 - Includes spaces for people to meet, play and interact and creates a user friendly layout for non-motorised users of all abilities, including pedestrians, cyclists, equestrians and wheelchair users;
 - Incorporates existing heritage and archaeological assets into new development;
 - Connects to existing green infrastructure, while creating a network of green spaces and links which enhance existing green infrastructure for both wildlife and people;
 - Takes account of existing patterns of drainage and flooding, and seeks to reduce flood risk through SuDS and flood defences if appropriate;
 - Takes advantage of sunlight and daylight; and
 - Provides adequate car parking, carefully located to ensure that it does not dominate.

4.67 **G.02 - Density and Uses:** The scheme must ensure to ensure density is between 15-25 dhp for detached/ semidetached houses, 20-30 dhp for terraces and 40-50 dhp for flats. Using lower density to relate positively to the edge of built up areas.

4.68 **G.03 - Layout and Plot Size:** Built up Structures and Development Plots: New developments should respond the surrounding pattern of buildings in order to crease a nature extension to the existing development.

The minimum back- to back dimensions should be 21m provided by rear gardens of minimum 10.5m. Back-to-back distances should be informed by the 25-degree rule.

Back to side distances between building should be informed by the 45 degree rule. Position buildings to take advantage of daylight and sunlight.

4.69 **H.03 - Open Spaces:** Proposed development must deliver open space in accordance with the Open Space, Playing Pitches and Built Facilities SPD and does not reduce areas of planting by more than 30% and provide a net increase in tree planting, including planting in lieu of any loss. Open space provisions should also be informed by the needs of the local community.

4.70 **H.04 - Residential Amenity:** Proposals must consider topography and orientation to maximise amenity, allowing for maximum daylight and sunlight and retain existing boundary walls, fences and hedges to preserve the street scene.

4.71 **H.07 – Waste / Recycling Storage Facilities and Utilities:** proposals should provide sufficient space to store the volume of bins and extra capacity for all recycling and waste types necessary. Ensure convenient access for service vehicles and provide sufficient space to avoid the need for frequent turning.

4.72 **I.01 - Car Parking:** Any proposed development must provide appropriate levels of residential parking as set out in Arun Parking Standards Guidance (2020) including electrical vehicle parking and cycle parking provision.

4.73 **J.08 - Internal Space Standards:** Development must meet or exceed the nationally specified space standards of the Building Regulations and provide adequate numbers of new homes as 'accessible and adaptable dwellings' and as 'wheelchair user dwellings'

4.74 **J.09 - Inclusivity/ Adaptability:** development should provide good-quality affordable housing within all major developments, without compromising on internal and external amenity space, design quality and finish.

4.75 **K.01 - Energy and Carbon:** all new developments must demonstrated consideration of embodied carbon; incorporate passive solar design; and use heat recovery systems whenever mechanical ventilation is installed.

4.76 **K.02 - Water and Materials:** all new development where possible should target water consumption of <110l/person/day through the incorporation of high efficiency fixtures and fittings and grey and rainwater harvesting.

National Planning Policy

National Planning Policy Framework (2021)

- 4.77 The revised version of the National Planning Policy Framework (NPPF), published in July 2021, replaces the previous NPPF (2019) and has built upon the principles which were set out in the preceding framework. It provides the overarching planning policy framework against which all local plans and neighbourhood plans should be prepared and against which all planning applications are determined.
- 4.78 The NPPF does not change the statutory status of the development plan being the starting point for decision making but does provide guidance to local planning authorities and decision takers.
- 4.79 Paragraph 8 of the NPPF establishes that *‘achieving sustainable development means that the planning system has three overarching objectives’. These objectives give rise to the need for the planning system to perform a number of roles:*
- “a) An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy” (p. 5).*
- 4.80 As detailed in Paragraph 10, at the heart of the NPPF is a presumption in favour of sustainable development. In addition, Paragraph 11 advises that development that accords with an up-to-date development plan should be approved *“without delay”*.
- 4.81 Paragraph 11 states that plans and decisions should apply a presumption on favour of sustainable development. For decision-taking this means:
- “Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

4.82 With regard to delivering a wide choice of high quality homes, paragraph 60 requires local planning authorities to *“support the Government’s objective of significantly boosting the supply of homes” (p. 17).*

4.83 The Government also attaches great importance to the design of the built environment which is illustrated in section 12. In particular, paragraph 130 states that planning policies and decisions should aim to ensure that developments:

- *“Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience” (p. 38 and 39).*

4.84 The Government also strongly encourages local planning authorities to approach decision taking in a positive way to foster the delivery of sustainable development, and paragraph 38 states that:

“Local planning authorities should approach decisions on proposed development in a positive and creative way... and work proactively with applications to secure development that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible” (p. 13).

Planning Practice Guidance

4.85 The Planning Practice Guidance (PPG) sets out guidance on a wide range of topics, including *inter alia* the following, which are considered to be relevant to determination of this application:

- Climate change;

- Design;
- Determining a planning application;
- Natural environment;
- Open space, sports and recreation facilities, public rights of way and local green space; and
- Renewable and low carbon energy.

5. PLANNING CONSIDERATIONS

- 5.1 This Section of the Planning Statement provides an assessment of the proposed development against relevant planning policy and other material considerations. It concludes that the proposal is in accordance with the development plan and fully addresses all comments made through the pre-application process, and therefore should be approved without delay.
- 5.2 Where relevant, this section also summarises the findings of other documents submitted in support of the application in the context of the relevant planning policy framework, and as such this Statement should be read alongside all of the other application documents listed in the supporting schedule of documentation.

Principle of Development

- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out a requirement that planning applications are to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 5.4 The NPPF is a material consideration and paragraph 11 is particularly relevant to this application. Policy SD SP1 of the Local Plan broadly reflects the presumption in favour of sustainable development, as outlined in paragraph 11 of the NPPF.
- 5.5 The Local Plan identifies a housing requirement of 20,000 new homes over the Plan period (2011 – 2031), with an annual requirement of at least 610 homes per annum (as set out in Policy H SP1).
- 5.6 However, ADC's most recent Authority Monitoring Report (AMR) (2022) indicates that the Council can currently only demonstrate 2.42 years of housing supply, and therefore there is a clear critical need for housing to come forward in the District.
- 5.7 Given that ADC are unable to demonstrate a five year housing land supply paragraph 11 d) of the NPPF is engaged and as a consequence the tilted balance applies in decision taking.
- 5.8 Paragraph 11 d) of the NPPF applies to decision-taking where there are no relevant development plan policies, or the policies which are most important to determining the application are out of date. As identified in footnote 8, this includes situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites.
- 5.9 The provisions of Footnote 7 to Paragraph 11 d) (i) are not engaged in this instance as the site does not relate to an area or asset of particular importance. Accordingly, Paragraph 11 d) ii) must be engaged and the tilted balance must be applied.
- 5.10 Paragraph 11) d) (ii) states that planning permission should be granted unless "*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*".

- 5.11 The presumption in favour of sustainable development or the tilted balance is also engaged as a result of the January 2021 Housing Delivery Test results. These demonstrate that ADC only has a 65% delivery rate, compared with the required amount of housing that needs to be being delivered. As ADC have failed to meet the 75% Housing Delivery Test threshold the tilted balance applies.
- 5.12 Whilst the Scheme complies with the Development Plan as a whole, it is accepted that the proposals do not strictly accord with Policies SD SP2 and C SP1 which seek to contain new development to within inside the Built Up Area Boundary. However, these Policies carry limited weight given that ADC's housing needs are out of date. Indeed, this is confirmed by Officer's through the pre-application response. Accordingly, these Policies are considered to be out of date in the context of Paragraph 11 d) of the NPPF.
- 5.13 As identified, the application site currently comprises an existing car salvage and recycling facility (sui generis). It is proposed to re-locate the business and redevelop the site for residential use only, therefore, there are two main considerations in determining the principle of acceptability of the scheme. Firstly, whether the site is suitable for residential development housing in and secondly, the acceptability of the loss of the existing waste use on the site. It is of note, that in considering the principle acceptability of the scheme during the pre-application enquiry in terms of social, environmental and economic benefits, ADC Officers have considered the proposal to be acceptable:
- "It is considered that the proposal would have clear social and economic benefits. Furthermore, the site is considered to be in a sustainable location and the impact to the environment is unlikely to be significant, subject to appropriate protection and mitigation measures being proposed. The definition of sustainable development does not simply relate to accessibility of services and facilities. It is considered, on balance, that the proposal would be environmentally, socially and economically sustainable".*
- 5.14 As discussed above, the site comprises Previously Developed Land (PDL), and sits within a wider, now predominantly residential area. Whilst the site lies outside of the Built-Up Area Boundary, the proposal would have clear social and economic benefits, and the site would be in a sustainable location, adjacent to the settlement boundary, making for a logical extension.
- 5.15 A full assessment of the tilted balance is provided later in this Statement, however, the following paragraphs summarise the key benefits of the scheme for ease of reference.
- 5.16 The social benefit (and ultimately also an environmental benefit), of making a much more effective and efficient use of the land in this context, through creating a well-designed development, which will improve the local areas sense of place, ensures that the scheme demonstrably outweighs any adverse impact which may arise from the development. With proposed green spaces and play areas, the development will foster local and accessible facilities, not only for new residents, but existing residents. This will contribute to social cohesion, in contrast to the exiting use, which does not offer the same social benefits.

- 5.17 The development plan also makes it clear there is a significant need for new housing and PDL should be utilised. This is consistent with Paragraph 120(c) of the NPPF, which notes that decisions should *'give substantial weight to the value of using suitable brownfield land within settlements for homes'*.
- 5.18 This shows a further clear benefit of bringing forward additional 80 high-quality homes on this site to help meet the Council's targets.
- 5.19 As a result of the lack of five year housing land supply as discussed above, the out of date nature of the policies in the Local Plan and the clear social, environmental and economic benefits to which the development would bring, as outlined in the suite of documents which accompany this application, the granting of planning permission would not result in adverse impacts that would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Thus, the application scheme accords with Paragraph 11 d (ii).
- 5.20 Furthermore, the scheme would also accord with Paragraph 122 of the NPPF, which requires planning decisions to *"support development that makes efficient use of land"* and Paragraph 130, which notes that *"where the design of a development accords with the clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to development"*.
- 5.21 It has been demonstrated throughout this Statement and the accompanying technical documents that the site is capable of delivering 80 high-quality homes which will help to meet Arun's current shortfall in housing, making better efficient use of land which is currently supporting a business which is no longer viable in its current form.

Loss of the existing business

- 5.22 Turning to the loss of the existing waste use, the relevant criteria required to be considered under Policy W2 of the WSWLP states:

"Development that would prevent or prejudice the use of existing waste management sites or infrastructure that make an important contribution to the transfer of waste will not be permitted unless:

(a) the current use is temporary and the site or infrastructure is unsuitable for continued waste use;

(b) continued use of the site or infrastructure for waste management purposes would be unacceptable in terms of its impact on local communities and/or the environment;

(c) redevelopment of the site or loss of the infrastructure would form part of a strategy or scheme that has wider social and/or economic benefits that clearly outweigh the retention of the site or the infrastructure for waste use; or

(d) a suitable replacement site or infrastructure has been identified and permitted."

- 5.23 A Waste Infrastructure Safeguarding Statement (WISS) and Employment Report accompany this planning application, which consider the criterion as set out above in further detail.
- 5.24 In summary, it is considered that criterion b) and c) are of most relevance to this application. Given the spatial and contextual change around the Site, it is evident that it is no longer appropriate for the waste facility to be located on this Site. The Site is now bounded by residential uses, which will likely constrain how the business will be able to operate and adapt to changes in the automotive industry, which the business needs to respond to.
- 5.25 Where the Site was once detached from the residential Built-Up Area (surrounded by fields to the south, west and north), it is now ultimately read as part of the settlement (albeit abutting the defined boundary), surrounded to the south and west by new homes and connected to the ribbon of housing extending to the North.
- 5.26 There is also an increasing pressure to have the appropriate facilities to process EV batteries, which is increasing year on year towards 2030 and also the need to operate more efficiently. The Site's opportunities to do this is extremely limited and it is not viable for them to undertake any expansion in this location.
- 5.27 As mentioned above, it is very clear that the proposed development will have significant social benefits, that will outweigh the retention of the waste use. The proposed development will provide 80 new homes and community co-working hub, with 24 of the homes comprising affordable housing tenures. Given the current lack of five-year housing land supply, this attracts significant weight in the planning balance.
- 5.28 These benefits also need to be considered against the backdrop that it is not viable to refurbish the site to create a sustainable business in the long term, nor is it viable to redevelop the site for other commercial uses (as evidenced in the Employment Report).
- 5.29 Therefore, it is considered that this application is clearly in compliance with Policy W2, in that it will not only deliver significant social and economic benefits which would outweigh the retention of the site for its current use; the continued use of the site for waste management purposes would be unacceptable in terms of its impact on local communities; but also on the business itself. It is critical that the business re-locates in order to be a viable, thriving business, with the delivery of the residential development generating the investment required to support the evolution of the business, ultimately ensuring that an important service can continue to operate within the District.
- 5.30 Overall and on balance, the development is considered acceptable in principle. It is clear that the site provides an appropriate location for new high quality housing in accordance with the Development Plan.

Layout and Design

- 5.31 Policies D SP1 and D DM1 of the Local Plan set out that all development proposals will be of a high quality, making efficient use of land that reflects the site and local area. The NPPF Section 12 also places great importance on design.
- 5.32 The proposal has had regard to the character and appearance of the surrounding area, utilising the Arun District Design Guide to inform the layout. The proposed dwellings are predominantly of a conventional two storey height and the spacing between the dwellings is reflective of other residential developments in the surrounding area. The flatted buildings comprise two and a half storeys.
- 5.33 Following comprehensive engagement with Officer's at ADC during pre-application consultations, the number of dwellings was reduced from 91 dwellings to 80, which allowed for a more spacious layout and greater enhanced landscape with a better mix of units. The 80 dwellings proposed remains unchanged from what was agreed with LPA at the second pre-application stage.
- 5.34 The proposed design has been influenced by the existing topography and landscape, reinforcing the local character by retaining trees as predominant boundary features, softening the landscape through the use of open spaces.
- 5.35 In addition to this, a well-connected network of streets are proposed, including desirable routes in order to integrate the existing and new communities.
- 5.36 The proposed development has been specifically designed to respond to the constraints of the site and the materials proposed reflect and respect the character and appearance of the surrounding area through the use of brick and flint features. The result is a form of development that will successfully assimilate into its surroundings, ensuring the existing landscape becomes an integral and positive part of the development.
- 5.37 Throughout the scheme the gable roof form is used most frequently along with hipped roofs being used intermittently, particularly to the rear to reduce the overall bulk of the roof.
- 5.38 The spacing between the proposed dwellings reflects other development in the vicinity of the site and ensures that the character of the area is maintained in this regard. The mix of terraces, semi-detached and detached dwellings reflects the developments and character in and around Eastergate.
- 5.39 A Design and Access Statement outlining the design approach for the site accompanies this planning application which provides further information relating to the layout and design of the scheme.
- 5.40 The proposals provide a well-planned, attractive development which reflects and respects the architectural vernacular of the surrounding area and the landscape buffers around the site, and therefore it is considered that the proposals are compliant with Policies D SP1 and D DM1 of the Local Plan and Section 12 of the NPPF.

Open Space and Residential Amenity

- 5.41 Policy OSR DM1 requires developments to contribute to and provide sufficient open and green space in line with policy requirements. Policy QE SP1 of the Local Plan and Policy H8 of the Aldingbourne Neighbourhood Plan requires development proposals to respect the local environment and amenities of neighbouring properties.
- 5.42 As part of the proposed development, a substantial green infrastructure strategy is provided which can be used by both residents and the wider community.
- 5.43 Pre-application feedback confirmed that the proposed development was required to provide a minimum of 6,600 sqm of public open space on-site in order to conform to the Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD (January 2020). The scheme proposes to deliver 6,770 sqm of open space, comprising play areas, amenity green space, and semi-natural and natural open space.
- 5.44 The quantum, quality and location of the landscaping and open space is in accordance with planning policy and will provide numerous benefits to the community.
- 5.45 The layout of the proposal has also been designed to ensure that suitable separation distances are achieved between proposed dwellings within the site. The layout and proposed dwellings have also been designed to provide reasonable levels of visual privacy to habitable rooms.
- 5.46 The proposed dwellings would have limited impact on the amenities of the existing properties due to separation distance, and the retention of hedgerow and trees situated along the boundary. Additional planting is also proposed to reinforce the screening between the existing and propose development.
- 5.47 Amenity space, in the form of individual private gardens for the dwellings and a communal garden for the apartments blocks are proposed, with the majority of gardens exceeding outdoor amenity and external space standards set out within the Arun District Design Guide.
- 5.48 The proposed scheme has been carefully designed to respond to the existing characteristics of the site and surrounding area. Further details on the proposed elements of the open space and residential amenity are provided in the Design and Access Statement and suite of technical documents which accompany this application.
- 5.49 The proposed development therefore complies with Policy QE SP1 and the Arun District Design Guide in respect of residential amenity.

Housing Mix and Tenure

- 5.50 Policy H DM1 of the Local Plan and Policy H2 of Aldingbourne Neighbourhood Plan state that developments are required to deliver a mix of dwelling types and sizes, to include affordable housing units that adhere to the latest Homes and Community Agency design guidance.

5.51 The proposed development will provide a mix of detached, semi-detached, and terrace properties, along with two apartment blocks. All of the proposed units will meet the nationally described space standards with at least 25% being able to meet the standards set out by the Building Regulations Part M4(2).

5.52 The housing mix for the proposed development is summarised below:

Table 5: Proposed Housing Mix

Tenure	Type	Bedrooms	No.	Sub-Total
Market	Apartment	1 bed	3	56
	Apartment	2 beds	2	
	House	2 beds	22	
	House	3 beds	21	
	House	4 beds	8	
Affordable	Apartment	1 bed	8	24
	Apartment	2 beds	8	
	House	2 bed	2	
	House	3 bed	5	
	House	4 bed	1	
Total			80	80

5.53 Policy AH SP2 of the Local Plan states that all market housing developments must provide a minimum 30% of the total number of units proposed on site to be provided as affordable housing on site. The Council will negotiate the affordable housing tenure mix on development sites from an initial position of 75% affordable rent and 25% intermediate housing.

5.54 A total of 24 affordable homes will be provided, of which 18 will be affordable rent and 6 will be intermediate, as shown in the table below. This complies with Policy AH SP2 of the Local Plan.

Table 6: Proposed Affordable Housing Provision

	1 Bed Apartment	2 Bed Apartment	2 Bed House	3 Bed House	4 Bed House	Sub-Total
Affordable Rent	6	8	0	3	1	18 (75%)
Intermediate	2	0	2	2	0	6 (25%)
Total	8	8	2	5	1	24 (100%)

- 5.55 The proposed housing mix between each tenures shown in the table above reflects what the ADC's Housing Manager requested as part of the pre-application process.
- 5.56 The Applicant acknowledges that the scheme will also be required to deliver a portion of the Affordable Housing as First Homes, and will seek to discuss with Officer's during the determination period regarding ADC's policy requirements for First Homes, and the appropriate tenure split.
- 5.57 Further details relating to the provision of affordable housing within the development are set out in the Design and Access Statement which accompanies this full application.

Landscape and Trees

- 5.58 Policy LAN DM1 of the Local Plan states that developments should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas.
- 5.59 Policy ENV DM4 states that proper provision must be made for the protection and management of trees or areas of woodland on-site when undertaking development.
- 5.60 An Arboricultural Impact Assessment (AIA) and Method Statement has been provided as part of this Full application to demonstrate that the arboricultural impact of the proposed development is of low magnitude, and that adequate protection can be provided to ensure all retained trees are protected throughout development.
- 5.61 The layout of the proposed development has been strongly influenced by the existing landscape present on site including the existing trees and these have been sought to be retained wherever possible.
- 5.62 The report incorporates a tree survey which was undertaken in November 2020. The tree survey and assessment considers the impact of the proposed development on all of the trees present across the whole site.
- 5.63 All existing trees within the site have been assessed (either individually, as a group or as a woodland) and have been categorised as Category A (high quality), B (moderate quality), C (low quality) or U (very poor quality).

- 5.64 As a result of the proposed development, 6 trees / hedges will require removal, and 1 tree will require partial removal. All of the individual trees/hedges for removal have been categorised as either Category B or Category C, however the majority of these trees are in poor condition. The 2 Category B items relate to a short length of Beech hedgerow, located at the entrance to the site. For further details, please see the Arboricultural Impact Assessment which accompanies this application.
- 5.65 To compensate for the removal and works to the existing trees, the proposals incorporate additional hedgerow and tree planting, which will provide a rich and varied planting scheme across the development.
- 5.66 As part of the proposal, Heritage Collective have prepared a Landscape Strategy and a Plant Schedule sets out the proposed landscaping for the Site. The Illustrative Masterplan shows a central green space with a formal LEAP play area along with a natural play area located towards the entrance to the Site.
- 5.67 The proposals clearly set out a comprehensive landscaping strategy which has placed a strong emphasis on native species which will enhance the area further, demonstrating how this site can bring multiple landscaping and biodiversity benefits for the wildlife and the wider community to enjoy.
- 5.68 Overall, the proposed development would not have a detrimental arboricultural impact. Indeed, the proposed development would have no unacceptable adverse arboricultural impacts on the character of appearance of the local landscape or the amenity or biodiversity which the existing trees provide.
- 5.69 For further details on the landscaping strategy for this site, please see the accompanying landscaping documents which are submitted alongside this application.
- 5.70 The proposed development therefore accords with Policies LAN DM1 and ENV DM4 as the landscape and trees associated with the development has been considered.

Highways and Parking

- 5.71 Policies T SP1 and GA3 state that new development should be designed to reduce the need to travel by car by identifying opportunities to improve access to public transport services, and proposals must provide adequate parking in accordance with the standards adopted at the time. Proposals that would result in a loss of parking spaces either on or off street will be resisted.
- 5.72 A Transport Assessment accompanies this application and sets out the transport strategy for the site in full detail. A summary of the Transport Assessment is provided below.

Access

- 5.73 The site is located on the western side of the A29 Fontwell Avenue and accessed via a 4.9m wide bellmouth adjoining the A29 Fontwell Avenue. As part of the proposed development, the application proposes the reformation of the site's existing access. The

proposed access would take the form of a priority junction with a left-in, all movement out arrangement. The proposed access has been designed in accordance with the relevant legislation.

- 5.74 The site currently has pedestrian access from a 1.6m wide footway on the eastern side of the road. An additional footway has been provided on the western side of the carriageway associated with The Hedgerows development, commencing just south of the site. The development would include the provision of a section of footway tying in with extant footways on the A29 Fontwell Avenue and offers a pedestrian crossing facility supported by a refuge island facilitating movement across A29 Fontwell Avenue.
- 5.75 The site is situated in a sustainable location within walking / cycling distance of Eastergate, Westergate and Barnham's local service and amenities. The location provides realistic options for travel by public transport.
- 5.76 An assessment of personal injury accident data showed no pattern of incidents in terms of incident distribution, frequency or severity that would be of concern in terms of highway safety. The proposed junctions have been subject to a visibility assessment, which demonstrates that the requisite visibility is achievable from the proposed access.
- 5.77 A vehicle swept path analysis has also been undertaken demonstrating appropriate operation of the proposed access and right turn lane by a variety of vehicles, including service vehicles and emergency vehicles.
- 5.78 The site's internal carriageways have been designed in accordance with the principles of Manual for Streets. The site's internal carriageways have been subject to a vehicle swept path analysis and visibility assessment demonstrating that the site would safely and appropriately operate.

Parking Provision

- 5.79 Arun District Council's 'Parking Standards Supplementary Planning Document' (January 2020) sets out the Council's parking standards, as summarised in Section 4 of this Statement.
- 5.80 As set out within the Transport Assessment, the proposals will provide a policy compliant car parking provision, comprising 169 allocated spaces, 17 (20%) visitor spaces (including 5% disabled spaces), 8 spaces for the co-working hub, and 2 parking spaces for the sub-stations. This accords with ADC's parking standards.
- 5.81 All of the parking spaces for both the houses and apartments will be provided with electric vehicle charging points, in line with Part L of the Building Regulations.
- 5.82 Cycle parking is provided throughout the development in the form of 131 cycle parking spaces. These will be located in sheltered and secure spaces within the rear gardens associated with each of the dwellings, and secure communal cycle stores for the apartments.

- 5.83 The Transport Assessment concludes that the car and cycle parking would be provided in accordance with Arun District Council's 'Parking Standards Supplementary Planning Document' (January 2020).

Traffic Impact

- 5.84 As shown in the accompanying Transport Assessment, the TRICS assessment suggests that the development will generate an additional 291 daily vehicle trips on the local road network, with an additional 29 and 26 trips in the AM and PM peak periods respectively.
- 5.85 A capacity model of the site access identifies that the site would generate negligible levels of flow restriction, even during AM / PM peak hours.
- 5.86 The assessment demonstrates that the proposed 80 homes can be accommodated with minimal impacts on the junction operation, and even with the forthcoming realignment of the A29 and resultant reduced traffic flows in the vicinity of the site, it is confirmed that for a 2023 scenario the junction would operate within capacity.

Fire Tender Access

- 5.87 The Transport Assessment demonstrates that the proposals for accommodating fire vehicle access are in accordance with the requirements set out within the Building Regulations 2010 Approved Document B Volume 1: Dwellings.
- 5.88 Suitable access has been provided to all dwellings to ensure that a fire appliance can reach to within 45m of all parts of the proposed dwellings. All internal access roads and private driveways are provided to a minimum of 3.7m in width, and access to dwellings can be achieved without the need to reverse distances greater than 20m.
- 5.89 The primary access has been designed in order to accommodate fire tenders vehicles to comfortably negotiate the proposed access. A vehicle tracking exercise demonstrating manoeuvres in and out of the site by a fire tender has been provided as part of the Transport Assessment.

Refuse/Recycling

- 5.90 Refuse tracking has been undertaken to ensure that the site can be entered and exited by both delivery and service vehicles in a forward gear. A full vehicle swept path analysis has been provided which demonstrates that refuse vehicles will be able to access, circulate and agree the site in a forward gear, routing within acceptable drag distances of all bin collection points. Additionally, the internal layout of the proposal ensures that refuse operatives can service each property within the recommended carry distances.
- 5.91 The proposed refuse collection strategy proposes bin carry distances in line with the thresholds set out in Manual for Streets. Where required, bin collection points have been proposed to minimise vehicle reverse and refuse carry distances.

- 5.92 In conclusion, the proposed development and associated access arrangements meet design standards and can be accessed safely by both car and non-car modes. The vehicular trips generated by the development can be accommodated on the local highway network and appropriate parking provision is provided on site. As such, the proposals are acceptable in transport and highway terms.

Ecology

- 5.93 Policy ENV DM5 of the Local Plan states that all development proposals should seek to achieve a net gain in biodiversity and protect existing habitats on site.
- 5.94 An Ecological Impact Assessment (EclA) has been undertaken by Corylus and is submitted with this application.
- 5.95 Ecological surveys were undertaken between March and October 2021. A grassland assessment identified the grassland to be species-poor semi-improved and the hedgerow assessment did not find any of the on-site hedgerows to be 'Important' under the Hedgerows Regulations. The grassland and hedgerows have been assessed to be of Site Importance. Included in the scheme is the creation of wildflower meadows, native, species-rich shrub/hedgerow and tree planting which will contribute to the enhancement of the existing habitat.
- 5.96 No bat roosts were identified in the mounted bat box on T1 during the 2021 inspection. Measures to reduce the indirect impacts of the development on bats have been outlined as part of the EclA, and include the inclusion of bat boxes, and appropriate low level lighting.
- 5.97 No Great Crested Newts (GCN) or reptiles were identified within habitats in the Site.
- 5.98 Whilst no evidence of dormice was recorded during the surveys, a population of dormice is known to be present in the adjacent residential development, and the on-site habitats connect directly to the dormouse habitat in the adjacent development. As such, the Site is considered to be of Neighbourhood Importance to the local dormouse population.
- 5.99 Ecological enhancements to enhance the development for biodiversity have been detailed within the accompanying report.
- 5.100 A Biodiversity Metric Report also accompanies this application. The Report demonstrates through the assessment that the development is able to provide an overall net gain in biodiversity, which can be achieved through creating of species rich grassland and wildflower meadows; the inclusion of native trees and hedges; and the creation of mixed scrub.
- 5.101 DEFRA Biodiversity Metric Calculations and a Biodiversity Impact Calculator also accompany this application, which demonstrate that the proposals can achieve a 24.49% positive net gain in biodiversity habitat units, and 413.98% in hedgerow units. This will be achieved through on-site habitat retention, enhancement and creation measures.

- 5.102 Mitigation measures are detailed in the accompanying Ecological Impact Assessment which will safeguard protected species associated with the habitats on-site in order to comply with current wildlife legislation and best practice guidelines.
- 5.103 The proposed development therefore accords with Policy EM4 of the Local Plan and demonstrates that the ecological impact occurring from the proposed development will be of a low magnitude.
- 5.104 Further details on the ecological impacts and proposed enhancement for the proposed development can be found within the accompanying ecological reports.

Flooding and Drainage

- 5.105 Policies W DM2 and W DM3 of the Local Plan states that all development proposals must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS).
- 5.106 A Flood Risk Assessment (FRA), Surface and Foul Water Drainage Strategy accompanies this submission and takes into account the detailed design of the site. The FRA identifies that the Site is located within Flood Zone 1 and concludes that no formal flood mitigation measures or flood resilience measures are required for the site.
- 5.107 Underlying largely permeable ground conditions are deemed viable for the disposal of surface water runoff via infiltration. A number of Sustainable Urban Drainage (SuDS) devices including soakaways, filter drain, permeable paving and dry basin are proposed to treat water prior to the discharge to the ground. The depth of the soakaways will be restricted to 1.9m, which is 1 m above the established water table, in the southern part of the site.
- 5.108 The surface water drainage will be discharged from the development site in accordance with the Drainage Strategy, which accompanies this submission. The inclusion of attenuation features, including a combination of soakaways, filter drains, rain garden and permeable paving, will store runoff on-site for up to and including the critical 1 in 100-year storm event, incorporating climate change allowances over the lifetime of the development (applied as a 40% uplift in peak rainfall intensity).
- 5.109 The Drainage Strategy considers that the site can be adequately drained in terms of foul water discharge via a new connection to existing public foul water sewers in Fontwell Avenue.
- 5.110 The proposed development therefore accords with Policies W DM2 and DM3 of the Local Plan and the NPPF and has given due consideration to flood risk from all sources and has developed a suitable surface water drainage strategy for the discharge of surface water from the site.

Heritage

- 5.111 Policies HER SP1, DM1, DM2 and DM3 of the Local Plan require development to be of high quality and based on a design-led approach, with regard to heritage. Development must conserve or enhance the quality of the District's heritage assets in a manner appropriate to their significance.
- 5.112 The Heritage Statement, prepared by Heritage Collective, is submitted in conjunction with this application. It provides a detailed assessment of the impact that the proposed development could have on the surrounding heritage assets. The Statement identifies four designated heritage assets considered to potentially be susceptible to settings impact by the proposals. These comprise the Eastergate Church Lane and Square Conservation Area; the Grade II listed Argyl House; The Long House; and Eastergate Memorial.
- 5.113 The Statement demonstrates that the proposals have been clearly designed in response to the local historic and evolved environment within which it will be situated. It concludes that the proposals will have no harm to the significance of the designated heritage assets in Eastergate, and that the change of use of the site to a residential development which is of a high-quality design will be beneficial to the character and appearance of the area surrounding the assets. The proposed development will also improve the aesthetic quality of the limited few glimpsed views outward from the Conservation Area or listed buildings on its northern edge.
- 5.114 It is clear that the topography, vegetation and existing development wholly screen the site from the Conservation Area and its character and appearance and setting would not be harmed by the proposals.
- 5.115 The proposals therefore comply with the relevant policies contained within the NPPF and Policies HER SP1, DM1, DM2, DM3 of the Local Plan.

Air Quality and Contamination

- 5.116 Policies QE DM3 and QE DM4 require all development proposals to assess the likely impact of the development on air quality and mitigate any negative impacts, and promote the use of previously developed land and the remediation of contaminated land to ensure that land is brought back into use.
- 5.117 An Air Quality Mitigation Statement has been prepared by Lustre Consulting. A mitigation assessment of dust levels was undertaken in order to provide guidance in relation to mitigation measures for the construction and operational phases.
- 5.118 Overall, the proposed development is considered to be a low to medium risk to local receptors. The impact of dust soiling can be reduced to negligible through appropriate mitigation measures, including locating machinery and dust causing activities away from receptors; fully enclosing the site or specific operations where there is a high potential for dust production; ensuring that there is an adequate water supply on the site for effective dust/particulate matter mitigation (using recycled water where possible); and undertaking

regulating monitoring of the construction process to ensure all relevant policies and processes are being complied with.

- 5.119 A Phase 1 Desk Study has also been prepared by Lustre Consulting, which determines that due to the existing use, there is a potential for contamination to be present on site.
- 5.120 In the western part of the site, potential exists for there to be the presence of imported soils, with the eastern part of the site susceptible to contamination from the inhalation and accumulation of vapours and ground gases, and the bulk hazardous liquid storage associated with the existing use.
- 5.121 As such, the Study recommends that a Phase 2 Investigation be prepared and submitted which can be secured via an appropriately worded planning condition attached to the grant of planning permission.
- 5.122 The Study found that several of the risks attributable to viable pollutant linkages were considered to be low and very low. The risk ratings identified in the assessment are not however considered to be prohibitive for the development and can be effectively managed through further investigation and appropriate mitigation.
- 5.123 The proposals therefore comply with Policies QE DM3 and DM4 as the proposals are unlikely to have an adverse impact on air quality and contamination during the construction and operational phases. The reports submitted with the application make appropriate recommendations to mitigate any adverse impacts which could arise.

Noise

- 5.124 Policy QE DM1 of the Local Plan seeks to protect any new development from noise pollution.
- 5.125 A Noise Assessment, prepared by Lustre Consulting, accompanies this application. An environmental noise survey was undertaken at the proposed development to assess noise levels affecting the new build site, with noise climate at the site considered to be primarily originate from traffic noise from the A29 (Fontwell Avenue).
- 5.126 Following pre-application advice, an additional noise survey was also undertaken during working hours within the week (Monday-Friday) in order to compare the varying degrees of background noise at different times of the week.
- 5.127 The concluding results outlined within the Assessment demonstrates that compliant internal and external ambient noise levels can be achieved across the site in both living and outdoor amenity space, using standard construction, double glazing and natural trickle ventilation.
- 5.128 The scheme is therefore considered to comply with Policy QE DM1 and be acceptable with regard to noise impacts.

Sustainability and Energy

- 5.129 Policy EH7 of the Neighbourhood Plan states that proposals for energy generating infrastructure using renewable or low carbon energy sources will be supported.
- 5.130 Policy ECC SP2 of the Local Plan requires all new residential and commercial development to be energy efficient and to produce 10% of the total predicted energy requirements for renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable.
- 5.131 A Sustainability and Energy Statement has been prepared which includes an energy strategy showing how selected energy efficiency measures have been considered and those which have been incorporated into the scheme.
- 5.132 It is proposed to enhance the fabric insulation standards of the buildings above the minimum required by the Building Regulations. It is also proposed to install a total of 100 x photovoltaic panels which will be installed on the southwest, south and southeast orientated rear and non-prominent roofs of the Co-working Hub. The panels will reduce emissions from the site by a total of 13,500 kg CO2 per year.
- 5.133 In addition, the water efficiency measures incorporated into the scheme will ensure a water efficiency target of 110 litres per person per day will be achieved for all homes.
- 5.134 Overall, the Statement demonstrates that by following the enhanced fabric insulation and photovoltaic panels, the emissions are reduced by 11.42%. It has also been demonstrated that the water consumption could equate to a maximum of 107.10 litres / per person / per day, which is significantly lower than the Building Regulations of 125 litres / per person / per day.

6. AFFORDABLE HOUSING STATEMENT

- 6.1 The following section considers the Affordable Housing provision within the development against the Policy requirements.
- 6.2 Policy H4 of the Aldingbourne Neighbourhood Plan 2 and Policy AH SP2 of the Local Plan relate to housing needs and affordable housing. Policy H4 requires that 30% affordable housing is required for any proposal for 10 or more new dwellings. It advises that the size and tenure of affordable units should reflect latest available housing needs evidence.
- 6.3 Policy AH SP2 requires that 30% affordable housing is required for any proposal for 11 or more new dwellings.
- 6.4 The application is for 80 homes, resulting in a requirement for 24 affordable homes, which are proposed as part of the application.
- 6.5 Policy AH SP2 set out a tenure split of 75% rent and 25% intermediate housing. In addition, the Policy requires the following dwelling mix ranges for the affordable homes:

Table 7: Policy AH SP2 Affordable Dwelling Mix Range Requirement

No. of bedrooms	Range
1	35 - 40%
2	35 - 40%
3	15 - 20%
4+	5 - 10%

- 6.6 In accordance with Policy H4 and Policy AH SP2, the affordable housing provision, tenure split and dwelling mix range is set out below in Table 8. As can be seen, a range of sizes and types of affordable homes have been provided, to reflect local need.

Table 8: Proposed Affordable Housing Provision

	1 Bed Apartment	2 Bed Apartment	2 Bed House	3 Bed House	4 Bed House	Sub-Total
Affordable Rent	6	8	0	3	1	18 (75%)
Intermediate	2	0	2	2	0	6 (25%)
Total	8	8	2	5	1	24 (100%)

Dwelling Mix Range	33%	42%	21%	4%	100%
---------------------------	------------	------------	------------	-----------	-------------

- 6.7 25% of the homes will be built to enhanced accessibility and adaptability standards, and there will be a 75% rented and 25% intermediate tenure split.
- 6.8 The Applicant acknowledges that the scheme will also be required to deliver a portion of the Affordable Housing as First Homes, and will seek to discuss with Officer's during the determination period regarding ADC's policy requirements for First Homes, and the appropriate tenure split.
- 6.9 Policy AH SP2 requires affordable homes to be distributed throughout the development. As can be seen on the Affordable Housing Plan submitted as part of the Design and Access Statement which accompanies this application, the affordable homes are dispersed throughout the site which creates an integrated and mixed community. In addition, the design of the affordable homes will be indistinguishable from the market homes.
- 6.10 The affordable housing proposals are therefore in accordance with Policies H4 and AH SP2.

7. DRAFT HEADS OF TERMS

- 7.1 The proposed development will deliver a sustainable residential development which will contribute to meeting the spatial strategy and housing needs within Arun District. Whilst the development does not have a detrimental impact, any impact can be mitigated by planning obligations (to be contained within a Section 106 Agreement) or appropriately worded planning conditions.
- 7.2 In April 2020, ADC adopted a Community Infrastructure Charging Schedule. In accordance with the Schedule the scheme is liable to contribute £99.40 per sq m (excluding index linking) on net additional floorspace based on it's Zone 3 location.
- 7.3 Whilst the majority of infrastructure associated with the development will be funded through CIL Receipts, for reasons discussed within Section 5 of this Statement, the draft Heads of Terms for the S106 associated with the proposed development include:
 - a) Affordable Housing
- 7.4 24 affordable homes, comprising 18 affordable rented and 6 intermediate will be provided on site, as detailed in **Section 6** of this Statement.
 - b) Green Infrastructure
- 7.5 Public Open Space and play areas, in the form of amenity open space, natural and semi-natural open space, a LEAP, two LAP's will be provided on site in accordance with the Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD (January 2020).
- 7.6 Off-site contributions will also be made in accordance with the Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD (January 2020).
- 7.7 The actual sum, triggers, and precise wording for any contributions is therefore to be agreed during the application process. However, all contributions must be substantiated and justified in the context of the NPPF and Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).

8. SUMMARY AND CONCLUSIONS

- 8.1 As detailed, planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The assessment in the preceding sections has assessed the proposed development against the Development Plan and the relevant policies.
- 8.2 As noted, the application seeks planning permission to redevelop the site for a mixed-use residential development with a co-working hub, following the demolition of the existing buildings and structures on-site, and the re-location of the existing business.
- 8.3 The redevelopment of the site presents a valuable opportunity to heal this part of the local landscape and integrate the site into the existing built fabric of the area. The Applicant's vision is to leave a positive legacy of their family business by creating a green, walkable, connected and high quality extension to the established local community.
- 8.4 It is clearly evident that Arun DC requires additional housing to support a range of needs. The proposed development will make an efficient use of the land in this case, in a sustainable location with easy access to public transport nodes.
- 8.5 Whilst there will be a loss of an existing waste / commercial use on the site, these buildings are of a low quality and the existing use conflicts with the residential uses that dominate the surrounding wider area. During the pre-application process, ADC Officers considered that the development was acceptable in principle and it is considered that the benefits of redeveloping the site to provide additional housing outweighs the loss of the existing waste facility in this location in this case.
- 8.6 Furthermore, as demonstrated in the accompanying Employment Report and Waste Infrastructure Safeguarding Statement, the profit and turnover of the existing business is declining, and is in clear need of expansion in order to incorporate new infrastructure which can provide better facilities in order to continue with the business. The existing site is sub-optimal and not appropriate to support this development of the business, and as such SRC Recycling Ltd. are looking to relocate.
- 8.7 Given the spatial and contextual change around the Site, it is also evident that it is no longer appropriate for the waste facility to be located on this site. There are also the significant social and ultimately environmental benefits that would demonstrably outweigh any harm identified through the loss of the waste use on the Site.
- 8.8 As detailed in the accompanying DAS, the scheme has been designed to reflect the surrounding vernacular found in Eastergate and Westergate. The height and massing of the dwellings are commensurate to the mix of buildings in the surrounding area which will create a high quality street scene. Each house also provides an appropriate private rear garden space and communal amenity space for the apartments, and each dwelling has been carefully designed so that future and neighbouring occupants privacy is not materially impacted.

- 8.9 An extensive landscaping scheme is also proposed, which will significantly enhance the quality of the environment around the site and substantially increase the levels of biodiversity. It will create linkages between and enhance the limited existing green infrastructure.
- 8.10 A range of other technical surveys and reports accompany the application. These confirm that there are no harmful constraints of significance or environmental impacts in the context of the existing trees, noise, air quality or contamination.
- 8.11 There will also be no severe impact on highway safety or the highway network, and the scheme meaningfully seeks to promote sustainable modes of transport from this urban location, in line with policy requirements.

The Tilted Balance

- 8.12 Paragraph 11 of the NPPF establishes the presumption in favour of sustainable development. Where there is no five year housing land supply or where the most important policies for determining the application are out-of-date, the 'tilted balance' should be engaged.
- 8.13 It has been demonstrated that ADC are unable to demonstrate a five year housing land supply and have fallen beneath the Housing Delivery Test threshold. Accordingly, the tilted balance should be engaged.
- 8.14 The most important policies for determining the application are Policies SD SP2 and C SP1 which seek to contain new development to within inside the Built Up Area Boundary. Taken as a whole these policies are to be regarded as out of date for the purposes of decision taking.
- 8.15 In the absence of a five year housing land supply and given the out of date policies, the titled balance is engaged and in accordance with the NPPF, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole.
- 8.16 Such benefits can be considered within the context of the economic, social and environmental objectives as described in the NPPF and these public benefits are considered below.

Environmental Objective

- 8.17 In this case, there will be significant public benefit to removing the existing poor quality buildings and the car salvage business from the site, which handles a significant amount of pollutants. This is considered to carry significant weight in in the planning balance.
- 8.18 Furthermore, there will be a significant uplift in biodiversity and landscaping across the site, such that the development will vastly improve the public realm in this location, the environment and visual quality of the surroundings. This is considered to carry moderate weight in the planning balance.

Social Objective

- 8.19 The scheme will make a substantial contribution to the Council's housing targets, particularly in the context of providing a good variety of homes which can meet a range of needs, making a social contribution to the local area. This is considered to carry significant weight in the planning balance.
- 8.20 ADC cannot demonstrate a five-year housing land supply (only 2.42 years), and as such the Council's planning policies that control the provision of housing must be considered out-of-date (para. 11(d) of the NPPF), with the planning balance 'tilted' in favour of supporting new housing in District. This is a significant supply shortfall; therefore, it is very clear that the District is in desperate need for new housing to come forward, which this proposal will make a meaningful contribution towards. The proposed development will provide 80 new homes, with 24 of the homes comprising affordable housing tenures. Given the current housing position this is a very important social benefit that attracts significant weight.
- 8.21 It will also provide much needed affordable housing for the local area and with the proposed co-working hub, the opportunity exists for people both to live and work locally, which all in turn makes contribution to the local economy.
- 8.22 The scheme makes a much more efficient use of the space in this context and are of a high quality design that will enhance the character of the area and sense of place for both future and existing and neighbouring residents. With proposed green spaces and play areas, the development will foster local and accessible facilities, not only for new residents, but existing residents. This will contribute to social cohesion, in contrast to the existing use, which does not offer the same social benefits. This is considered to carry moderate weight in the planning balance.

Economic Objective

- 8.23 As discussed in extensive detail throughout the documentation which is submitted in support of this planning application, it is clear that it is not viable to refurbish the site to create a sustainable business in the long term, nor is it viable to redevelop the site for other commercial uses (as evidenced in the Employment Report). Whilst the existing use has some economic benefits (employs 12 people and as local business, makes a contribution to the local economy), the consistent decline in the business financials are only going to increase, resulting in the economic benefits slowly diminishing. Providing 80 homes and a community hub will create longer term economic benefits on the site and in the local area (through local spending and attracting people with small businesses who may benefit from working at the community hub).
- 8.24 The re-location of the existing business to a more modern, purpose-built site will also allow for further investment, and an increase in the workforce, creating more job opportunities. This is considered to carry moderate weight in the planning balance.
- 8.25 The redevelopment process would also generate employment opportunities during the demolition and construction phase, additional council tax and additional expenditure into

the local economy. Whilst the existing land use has made contributions to the economy in this context, in recent times this has been limited (and continues to be), and the proposed residential development of 80 houses will make a long term contribution. This is considered to carry moderate weight in the planning balance.

Conclusion

- 8.26 The application site lies beyond the settlement boundaries of Eastergate. Whilst development would not therefore, accord with planning policies in terms of its location being outside the settlement boundaries, given the lack of five year housing land supply and the lack of delivery against the Housing Delivery Test, coupled with the fact that the policies for the delivery of housing are out of date, this conflict can only be given limited weight in the decision making process.
- 8.27 The proposal would result in harm as a consequence of the loss of the existing employment use at the site. However, this harm is considered only to be moderate in weight in the planning balance given the supporting evidence, which accompanies this application demonstrating that the existing business is unviable to continue in its current location and given recent surrounding development is no longer a suitable location for such a use.
- 8.28 Therefore, taking all these matters into account, on balance, the benefits arising from granting planning permission would demonstrably outweigh any adverse impacts arising, when assessed against the policies of the NPPF as a whole. In accordance with Paragraph 11 d) of the NPPF and the presumption in favour of sustainable development planning permission should therefore, be granted.
- 8.29 This planning application and the proposals contained therein are therefore commended to ADC for due consideration and approval.



Boyer

