

PLANNING STATEMENT

BMW HOUSE

CHANDLERS GARAGE LTD,

WATER LANE

ANGMERING BN16 4EH

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INTRODUCTION

The proposal involves the demolition of the existing buildings and the erection of retirement apartments aimed at the over 60s who are seeking to downsize and who wish to benefit from a safe, secure environment with like-minded people. The proposal would provide a total of 33 apartments, dedicated parking spaces for use by residents and their visitors. A buggy store is also provided for residents. In addition it is proposed to erect a retail store at the front of the site with its own dedicated parking and 2 parking spaces for Byways.

The proposed building in its totality has been designed to respect its setting as fully explained in the Design and Access Statement. In addition, the approach to security for the retirement apartments is explained in the attached document at **Enclosure 1** entitled **Safe and Secure**.

The development would provide the opportunity for a high-quality residential development and retail store that would positively contribute to meeting a local housing need for older people. It represents a sustainable development, with wide ranging social and planning benefits, both for potential residents and the community.

NATURE AND CONCEPT OF RETIREMENT HOUSING

Retirement housing (Category II type sheltered housing) is a proven option for those older people who need to move into accommodation, which provides them with greater comfort, security and the ability to manage independently to a greater extent. It enables older people to remain living in the community and out of institutions while enjoying peace of mind and receiving the care and support, which they need.

The scheme provides a needs-based choice for residents to downsize and move to an age restricted form of accommodation of like-minded people. People seeking to downsize from larger houses can achieve comfort, care, security and the ability to manage independently in housing that is future proofed as they themselves age. It enables older people to remain living in the community and out of more institution type accommodation while enjoying peace of mind.

Moreover, retirement housing releases existing under-occupied housing (i.e. family houses that have become too large for small elderly households) and thereby helps make better use of the housing stock in general. The majority of residents of retirement schemes generally originate from the "local" area (45% of sheltered residents originate from within a 5 miles radius (approximately 72% within 20 miles) and thus the move to retirement accommodation aids in freeing up local under occupied housing stock. It is probable that the potential occupiers of this development will have a similar "origin" profile.

All McCarthy & Stone developments are specifically designed to provide specialised housing accommodation for the elderly, with communal facilities and specific features within the apartments designed to meet the

particular needs of the elderly. While anyone may purchase an apartment, the apartments are sold on the basis of a 999 year lease requiring the accommodation and subject to each apartment being occupied by persons over 60 years of age or in the case of a couple that one of the occupants is over the age of 60 years and the other is over the age of 55 years.

This is a reasonable and caring approach to the limitation on occupancy of retirement housing in that it recognises and allows for those exceptional cases where a spouse, who is in the need of special accommodation, may have a younger partner. Such occurrences are, in fact found to be extremely rare as between 60 and 70% of occupants are aged 78 years or more with about 30% aged 80 years or more. The vast majority of McCarthy & Stone residents (some 85-90%) are widowed or single, with approximately 75% comprising single, female households.

THE SOCIAL AND ECONOMIC BENEFITS OF RETIREMENT ACCOMMODATION

The proposal provides a valuable form of specialised accommodation, which meets a specific housing need. In so doing, it gives rise to significant planning and social benefits accord with national planning objectives.

In terms of social benefits, the **Institute of Public Care (IPC)** produced a report entitled '**Identifying the Health Gain Benefits from Retirement Housing**', the executive summary of the report has been appended to this statement at **APPENDIX 1**. As the report states it considers the benefits in terms of health gain from specialised accommodation for older persons compared to the general market housing stock. The report identifies that retirement housing results in the following benefits:

- Specialist housing is associated with a reduced level of expected nights spent in hospital. This is estimated as producing an annual cost saving to the NHS of £2,598 per resident per annum.
- On average residents of retirement living schemes experience a 35% improvement in mobility and 20% in functions of daily living. There is also a 25% reduction in the use of medication by residents.
- Over 50% of residents believe that private sheltered housing helps to promote good health. More than half of all residents (55%) consider their health to be good or very good.

The above report supports earlier findings by ORB in its report entitled '**A Better Life: Private Sheltered Housing and Independent Living for Older People**', the Executive Summary is appended to this Statement at **APPENDIX 2**. In respect to health care benefits the report identified:

- The average number of visits per annum to a GP from current residents of retirement housing is 4.2 compared to 6 visits amongst the national population aged 75+.

- 41% of residents of retirement housing felt that their health had improved from making the move into retirement housing.

With respect to the economic benefits of proposals, the Institute of **Public Care (IPC)** produced a report entitled ‘**Local Area Economic Impact Assessment**’ which economic considered the benefits of specialist accommodation for older people.

The report, attached at **APPENDIX 3**, identified that:

- £7.53 million of housing stock was released of which 66% was under occupied
- A increase in local spending of £125,000 per annum compared to a general needs development
- £1,419 directly attributable to savings on health and social care
- £5,000 of social capital i.e. involvement in local community groups

SUPPORTING LOCAL HOUSING MARKETS AND FREEING UP UNDER-OCCUPIED HOMES

The UK is facing a crisis in housing provision. However, it is not just a question of supply; it is also about the way in which existing housing provision is made available to future generations. While millions of families and young people struggle to find and own property large enough for their needs, there are more than 25 million empty bedrooms in under-occupied homes in England. Very many of these are in the homes of the over 50s and retired; by 2026 empty bedrooms in the homes of older people will exceed 10 million.¹

The scheme provides a needs-based choice for residents to downsize and move to an age restricted form of accommodation of like-minded people. People seeking to downsize from larger houses can achieve comfort, care, security and the ability to manage independently in housing that is future proofed as they themselves age. It enables older people to remain living in the community and out of more institution type accommodation while enjoying peace of mind.

Moreover, retirement housing releases existing under-occupied housing (i.e. family houses that have become too large for small households) and thereby helps make better use of the housing stock in general. The majority of residents of the scheme are anticipated to originate from the area.

The solution to both better health and more downsizing relies on increased choice for older people. Specialist accommodation for older people such as this provides this choice. It is particularly important that any new provision focuses on accommodation built for owner-occupation. Nearly 80% of older people currently own their own, and few wish to move into social or rented accommodation at this time in their lives.

¹ Intergenerational Foundation, *Hoarding of Housing: Fairness for Future Generations*, October 2011

Housing Markets and Independence in Old Age: Expanding the Opportunities by University of Reading (Professor Michael Ball May 2011) concluded that policy makers must act now if they are to avoid a growing crisis in the provision of housing for older people. The Executive Summary is attached at **APPENDIX 4**.

The document highlights that there are only 100,000 specialist private retirement homes in the UK. Yet by 2033, there will be an extra 3.5 million households aged over 65 years, a 60% increase on today. Without suitable and affordable accommodation, these demographic changes could result in significant housing problems for the elderly.

The report comments that private retirement accommodation, referred to in the report as owner occupied retirement housing (OORH), can address this problem. OORH is a form of retirement accommodation designed specifically with older people in mind and purchased on a leasehold basis, which has high levels of consumer satisfaction. OORH can also help reduce public expenditure, particularly health costs, and provide wider benefits to society.

However, the report notes that due to policy restrictions surrounding housing and planning, the supply of OORH does not meet present or growing demand. Build rates are low and need to grow four times from that achieved before the 2007/8 downturn to cope with just a moderate increase in demand.

The report states that the primary reason for the limited supply of OORH is 'strategic neglect' by policy makers, with public policy directly responsible. The report notes that a large number of planning applications by developers for OORH are refused by local authorities who fail to understand its benefits. This "strategic neglect" is referred within the NPPG which states that accommodation for older persons is "critical".

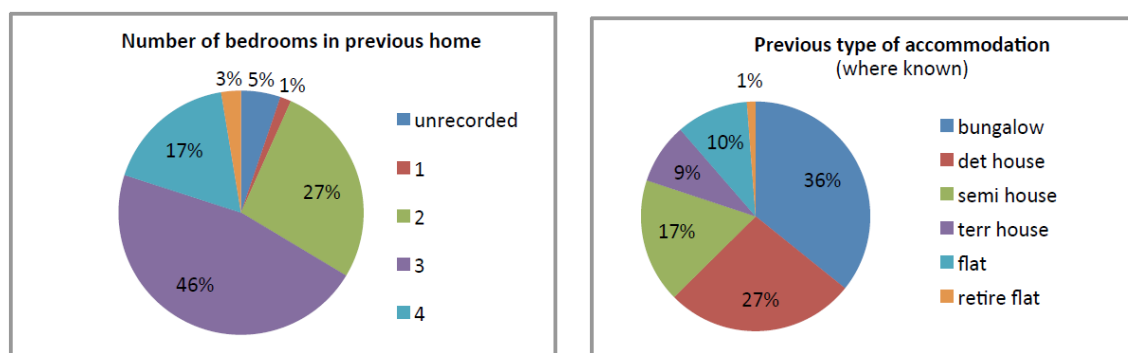
Lack of government guidance also means that often there is no stimulus for Councils to start thinking properly about this sector. There are also difficulties associated with the specialised nature of OORH, including land taxation in the form of affordable housing and increased building costs not incurred by more traditional house builders. These difficulties could be addressed with simple supply-side inducements.

The report included an analysis of the sales records 5,000 older people who bought McCarthy & Stone properties between 2007 and 2010. They show how specialist housing frees up under-utilised family-sized housing in the local area.

- For every 5,000 owner-occupied retirement homes sold, family housing to the value of £1.1 billion is released back onto local housing markets.
- For an individual retirement housing scheme of 40 dwellings, this equates to the release of 40 family-sized homes – the majority of which are in the local area – worth nearly £9 million.
- The average value of the individual dwellings released is just under £220,000. Two thirds had three or more bedrooms.

- Property vacated is then usually bought by younger people and often used to raise families. In this way, local housing stock is recycled through the generations.
- Provision of specialist retirement housing has a multiplier effect through the housing chain. For each individual specialist dwelling built, housing for six people is provided; the classic' family of four in the vacated property, and the couple downsizing into specialist accommodation.
- A wider chain of moves is also triggered. As the initial property vacated is likely to be quite substantial, additional moves further down the chain occur. On many occasions, six or more moves can be stimulated.
- First time buyers also benefit. It is estimated that within six moves, a first time buyer is able to enter the housing market.

Figure 5.6: Characteristics of previous homes



*Figures from the University of Reading report

THE LOCAL NEED

Coastal West Sussex Strategic Housing Market Assessment Update Final Report November 2012 identified that the older person population in Coastal West Sussex (including Arun) is particularly large when compared with regional and national figures. In addition, the population is projected to increase significantly up until 2030/31 with growth in the population aged over 55 of up to 16%. It also identified that older persons are more likely to under-occupy homes.

The demographic imperative ultimately fed into the Local Plan and is recognised under Policy **H DM2 Independent Living and Care Homes**. It is therefore clear that there is a significant need for specialist accommodation for older people.

Attached at **APPENDIX 5** is the **Compendium of Reports Promoting Specialist Housing for Older People** which outlines the various reports supporting the provision of specialist accommodation.

The **National Policy Framework 2019** requires the planning system to deliver sustainable development in terms of:

- **Planning for prosperity (an economic role)**
- **Planning for people (a social role), and**
- **Planning for places (an environmental role)**

The three components need to be pursued in an integrated way looking for solutions which deliver multiple goals. It is therefore clear that the National Planning Policy Framework wishes to see is balanced decision making with all factors considered rather than decisions made in isolation of the three overriding principles.

The development is a very sustainable form of development in a sustainable location. By achieving positive improvements in the built, natural and historic environment as well as the quality of older people's lives, in this particular case, there should be **"a presumption in favour of sustainable development."** Furthermore, for decision makers (paragraph 11 NPPF) this means approving development proposals that accord with the development plan without delay.

In this respect it is notable that paragraph 38 states: **"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments 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"**.

The Core Planning Principles set out in the NPPF include the following relevant ones that planning should proactively drive and support sustainable economic development to deliver the homes that the country needs. It is also seeking to secure high quality design and a good standard of amenity for all existing and future occupiers of land and buildings. A further principle is to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.

Set out below are comments on some of the key sections of the NPPF.

Section 4 - Decision-making: This advises LPA's to approach decisions in a positive and creative way and should seek to approve applications for sustainable development where possible.

Paragraph 44 advises LPA's to only require supporting information which is "relevant, necessary and material".

Planning Conditions and Obligations: **Paragraph 55** advises that planning conditions should only be imposed where they are *“necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects”*.

If contributions are sought under the auspices of Section 106 of the Act then **Paragraph 57** sets out the legal tests under CIL Reg. 122, which requires that planning obligations should only be sought where they meet all of the following tests:

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development

Section 5 – Delivering a Sufficient Supply of Homes: The proposed development will provide specialist accommodation for older persons who are a significantly and growing sector of the local population.

Paragraph 59/61 of the NPPF outlines the need to boost the supply of dwellings and within this context, paragraph 61 states:

“...the size, type and tenure of housing needed for different groups within the community should be assessed and reflected in planning policies (including but not limited to, those who require affordable housing, families with children, older people, people with disabilities) ...”

Paragraph 60 also sets out that LPAs should determine by the minimum number of homes and that strategic policies should be informed by a local needs assessment.

Section 9 – Promoting Sustainable Transport: Transport Statements, Assessments or Travel Plans should only be required where developments generate *“significant amount of movement”*. The proposed development will not result in any significant traffic movements.

Section 12 Achieving Well Designed Places: **paragraph 124** reinforces the importance of Good Design in the built environment. Good design being a key aspect of sustainable development contributing positively to making places better for people. **Paragraph 126** seeks to ensure that design policies in terms of detail and prescription should be tailored to the circumstances in each place and should allow a suitable degree of variety where this would be justified.

The proposed development has been the subject of public consultation as detailed in the accompanying SCI. The design is fully explained and justified in the accompanying DAS statement.

Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change: **Paragraph 153** advises that new development should comply with policies for decentralised energy supply unless it is not feasible and

viable and *take account of land form, layout, building orientation, massing and landscaping to minimise energy consumption*".

The proposed development is highly sustainable and will be constructed to meet the latest government and policy requirements.

Paragraphs 155-165 deal with flood risk, identifying that developments ought to be sited whenever possible in zones at lower risk of flooding and that Sequential and Exception Tests may need to be accordingly applied.

Section 16 Conserving and Enhancing the Historic Environment: deals with such assets including proposals which may affect them. **Paragraph 189** requires an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 190 requires that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 192 states that in determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 193 identifies that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Paragraph 195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

In applying these tests, regard should be had to the advice of English Heritage in its publication of 2015 entitled “**The Setting of Heritage Assets**”. One of the main points of emphasis in this advice is that particular regard should be had to establish the significance of both the Heritage Asset(s) affected and the development proposed.

With reference to the NPPF, one must of course also be aware of the statutory position under Sections 66 and 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990 which respectfully requires:

Sec 66: special regard must be given by the planning authority in the exercise of planning function to the desirability of preserving or enhancing listed buildings and their settings,

Sec 72: ‘special attention’ shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas”.

The above points are considered in more detail in the accompanying Heritage Statement but in summary, the proposed development has taken due regard of the statutory position and it is considered that the proposal would result in positive improvements to the heritage assets. Consequently as there is no harm, the “tests” of harm set out in the NPPF do not apply.

Annex 2 – Glossary: **Older People** are defined as “people over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs” (my emphasis). Clearly the proposed development will meet these aims and the NPPF as a whole.

The National Planning Policy Guidance up to 2018 placed an emphasis upon the “critical” need to provide housing for older people and housing for older people features heavily in the guidance. In the section entitled **The Identifying the Need for Different Types of Housing: Housing for Older People.**

The issue is considered so significant that on 26th June 2019, predating the NPPG update of July 2019, that a separate guidance **Housing for Older and Disabled People** was issued (June 26th, 2019). This identified and re-emphasized the need to cater for older people by offering a better choice of accommodation to suit changing needs and to help them maintain their independence. And that the relationship between ageing and housing need should be understood from plan making to decision taking.

It is clear that the proposal would meet the fundamental aims of the NPPF and the NPPG. These broader benefits are explored below in the following sections.

Health and Wellbeing - paragraph 005. The scheme actively promotes a healthy community in that the retirement scheme creates a healthy living environment adaptable to the needs of the increasingly ageing population. As set out in the main submission the community / communal nature of this specialist form of housing creates a safe and secure environment for people to live together with a watchful eye of like-minded residents and the ability for residents to spend more time in their own homes rather than being a burden upon hospital or local care facilities.

Design - paragraph 001 as well as reinforcing that “good quality design is an integral part of sustainable development” it states that achieving good design is about creating places, buildings or spaces that work well for everyone, look good, will last, and adapt for the needs of future generations.

Similarly, in line with **paragraph 002** the scheme delivers a wide range of planning objectives enhances the quality of buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well-being addresses the need for different uses sympathetically.

Paragraph 004. LPAs are instructed to give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. This could include the use of innovative construction materials and techniques. Planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.

Paragraph 005 acknowledges that to achieve good design the use of expert advice from appropriately skilled in house staff or consultants may sometimes be required.

Paragraph 007. Design should promote local character “**Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.**”

The scheme successfully integrates into its surrounding context. The DAS sets out clearly how new building due to its design and form contributes to the surrounding area.

The scheme also promotes access and inclusion (paragraph 012) being in a sustainable location as it enables many older local people to downsize and remain very much part of the local community if they so wish.

Paragraph 023 sets out the five key design considerations:

- layout – the way in which buildings and spaces relate to each other
- form – the shape of buildings
- scale – the size of buildings
- detailing – the important smaller elements of building and spaces
- materials – what a building is made from

These are assessed in the submitted Design and Access Statement.

In addition, there are economic benefits flowing in relation to the specialist accommodation as outlined in **Annexe B of A Better Life** which is attached at **APPENDIX 5** and an **IPC Report** entitled **Local Area Economic Benefits which is attached at APPENDIX 6**. They outline the spending power of a traditional sheltered scheme which one would expect to be similarly applicable to an Assisted Living development. One would also envisage an economic boost with respect to the general market accommodation.

The clear expectation of the NPPF is that development should be encouraged except where this would compromise key sustainable development principles set out in national policy. The current appeal proposal would not compromise national policy, indeed it is wholly in concern with its aims.

The proposed development would provide specialist accommodation which would cater for the ageing population. It would increase consumer choice, create a more balanced community by having greater housing choice available to it.

It would result in the occupants of the development shopping locally thus assisting in the economic well being of the area. The construction phase would create employment approximately 50-80 jobs as well as some in related support industries.

The Community Infrastructure Regulations gives the former Circular 5/05 Planning Obligations tests legal force in that Regulation 122 provides that “a planning obligation may only constitute a reason for granting planning permission if the obligation is:

- a. necessary to make to the development acceptable in planning terms;*
- b. directly related to the development; and*
- c. fairly and reasonably related to the scale and kind to the development.”*

Even when a contribution could in principle apply, the decision maker must apply planning balance and assess whether its absence or failure to meet requests in full would justify the withholding of planning permission.

The tests set out in the circular are explicit, restrictive and place the burden upon the decision maker not only to justify each and every request, but to then assess and apply “*planning balance*” to the matter having regard to whether the absence of a contribution(s) or a failure to meet such a contribution in full is such that planning permission ought not to be granted. The applicant will of course consider any requested contribution which may not be covered under the CIL charging regime.

Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society (February 2008). This document sets out the government strategy for an ageing society and it recognises that the number of households increasing to growth and that by 2026 over 50% of all householders will be aged over 65 years of age. In order to meet this challenge, the government wants to ensure that there is a right range of choices of specialised housing available to those who need more support. It recognises that housing is central to health and well-being.

The summary of chapter 2 identifies and recognises that the vast majority of householders (68%) own their own homes and this is expected to rise to around 75% by 2026. As such, these people are expected to wish to maintain their own independence by owning their own accommodation/homes.

The government expects Local Authorities to plan for the housing needs for the whole community. This effect reiterates PPS3, Paragraph 23, now repealed but superseded by the NPPF, which still requires that the full range of housing provision be considered.

Chapter 11 specifically deals with specialised housing such as retirement accommodation for the elderly. The guidance identifies that there is a continuing need for specialised housing and that such accommodation will continue to offer a certain advantage over private housing, particularly to those who need a physical environment designed for those with impairments, better access to help and care, company and a sense of safety. In the provision of appropriate accommodation for the elderly it is also recognised that the private sector has a major strategic role in this.

“HAPPI – Housing our Ageing Population: Panel for Innovation”, published in December 2009, said *“The time has come for a national effort to build the homes that will meet our needs and aspirations as we all grow older”* and *“we should all plan ahead positively, creating demand for better choice through a greater range of housing opportunities”*. The proposed development would achieve the broad aims of the report and would also be in concert with national guidance which seeks to provide housing choice for the elderly.

THE DEVELOPMENT PLAN

The Development Plan, as far as is relevant to this planning application, comprises of the Arun Local Plan(2011-2031) 2018, the Angmering Neighbourhood Plan, Arun Local Plan Update 2019

ARUN LOCAL PLAN(2011-2031) 2018		
SD SP1 SUSTAINABLE DEVELOPMENT		
SD SP1A STRATEGIC APPROACH		
SD SP2 BUILT UP AREA BOUNDARY		
POLICY SD SP1 promote sustainable developments and that the LPA will work with applicants to find solution. (Author’s summary) SD SP1A sets out strategic approach including the provision of 20,000 new homes, and SD SP2 that such developments should be within settlements.(Author’s summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposal is a highly sustainable development on an identified housing site within a settlement (policy HD2 of the Neighbourhood Plan). The provision of specialist accommodation and a retail unit will meet identified needs and contribute to the socio-economic well-being of the area.
RET SP1 RETAIL		
POLICY The policy supports the provision of retail facilities to serve the needs of its residents. It also seeks to preclude the loss of retail uses located outside defined centres. (Author’s summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The site is just beyond the core retail area identified in the Neighbourhood plan which militates against the loss of retail units. The proposal of approx 370 sqm including storage, in contrast includes the provision of a retail unit which would serve the village. It would assist in creating some additional employment.
POLICY H SP1 HOUSING REQUIREMENT		
POLICY The policy seeks to provide 20,000 new dwellings (Author’s summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The housing provision would be met via allocated and unallocated sites, some of which such as this proposal would be on a Neighbourhood Plan allocated site.
POLICY H DM1 HOUSING MIX		
POLICY The policy seeks that a mix of accommodation be provided including that for older persons. Author’s summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposal for age restricted retirement accommodation will assist in meeting the identified housing need and that in the SHMA for specialist accommodation.
POLICY AH SP2 AFFORDABLE HOUSING		

POLICY The policy as a headline rate seeks the provision of 30% affordable housing subject to viability considerations (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The issue of attempting to provide affordable housing is well understood in planning circles and consequently as on previous occasions a commuted sum is proposed. The level of contribution is set out in the accompanying Financial Viability Assessment
POLICY H DM2 INDEPENDENT LIVING AND CARE HOMES		
POLICY The policy supports the provision of specialist accommodation to meet this specific demographic need (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposal is for age restricted retirement living accommodation, more commonly known as sheltered housing.
POLICY D SP1 DESIGN & POLICY D SP1 ASPECTS OF FORM		
POLICY The policy seeks good quality architectural and landscaping design which has regard to its context. (Author's Summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The Design, Access and Sustainability Statement explains the design. The proposal has been designed by an experienced and qualified Architect, with regard to the constraints and opportunities presented by the site and its surroundings including having regard to Sec 66 and Sec 72 of Planning (Listed Building and Conservation Areas) Act 1990. The proposal will not give rise to any demonstrable harm to interests of acknowledged importance but result in an overall enhancement to the heritage assets while at the same time providing much needed accommodation. The site is well located in relation to shops, services and community facilities. In accordance with the NPPF, the normal presumption of allowing development should prevail.
POLICY D DM2 INTERNAL SPACE STANDARDS		
POLICY The policy seeks internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance (Author's comments)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposed accommodation is designed to meet the ongoing needs of its prospective occupiers, which essentially are overwhelmingly single occupancy units. The apartments all exceed the national space standards.
POLICY ECC SP1 ADAPTING TO CLIMATE CHANGE POLICY EEC SP2 ENERGY AND CLIMATE CHANGE MITIGATION		
POLICY In broad terms the policies seek that developments are designed to address climate change impacts such as flooding and that 10% of a development's energy needs are met from renewables on site (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The policy requirements can be met as on other sites and a planning condition to this effect can deal with the matter.

POLICY ENV1 SP1 THE NATURAL ENVIRONMENT POLICY ENV DM4 PROTECTION OF TREES POLICY ENV DM5 DEVELOPMENT AND BIODIVERSITY		
POLICY The policies seek in as far as it is applicable to the proposal, that new development respect the biodiversity and natural environment and contribute to its protection (Author's Summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The site predominantly occupied by buildings and hard surfacing. In contrast the proposal will provide landscaping which will ecologically enhance the site. An Ecological Impact Appraisal accompanies the application.
POLICY HWB SP1 HEALTH & WELLBEING		
POLICY The policy seeks that developments should be designed to maximise opportunities which support the aims of the policy (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION Comments with supporting evidence as to the beneficial impacts of the proposed form of accommodation is detailed elsewhere in this report.
POLICY T SP1 TRANSPORT AND DEVELOPMENT		
POLICY This is a very wide ranging policy which looks to promote alternatives to private vehicles (Author's Summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION Please see the Transport Statement. The site is well located for the intended uses. The retirement accommodation would not be a significant traffic generator.
POLICY HER SP1 THE HISTORIC ENVIRONMENT POLICY HER DM1 LISTED BUILDINGS POLICY HER DM3 CONSERVATION AREAS POLICY HER DM6 SITES OF ARCHEOLOGICAL INTEREST		
POLICY The policies in effect set out the requirements under Sec 66 and 72 of the Act to have due regard to heritage assists to ensure that such are not adversely impacted (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The application is accompanied by a Heritage Statement which considers the relationship of the site to its context which is partly within the CA and adjoining a LB (plus further afield). Having established this baseline having regard to Sec 66 and 72 of the Act it concludes that the proposed development would be positive. As such the statutory tests are met and para 193-196 of the NPPF do not need to be considered.
POLICY W SP1 WATER POLICY W DM1 WATER SUPPLY AND QULAITY POLICY W DM2 FLOOD RISK POLICY W DM2 SUSTAINABLE DRAINAGE SYSTEMS		
POLICY The policies collectively seeks to avoid inappropriate development in areas at current or future risk from flooding new development. That such developments are drained in an appropriate manner and that water consumption is reduced as far as is possible to 110 litres per person per (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The application is accompanied by an FRA which identifies that the site is partly in FZ1, FZ2 and FZ3 which is a flood risk. It is however an allocated development site within the Neighbourhood Plan. The application is accompanied by a FRA and a Drainage Strategy Statement which cover both aspects and how the site can be suitably developed. e supporting

		documents also includes a Drainage Strategy which outlines how the site would be appropriately drained. In terms of water consumption as on other developments appropriate measures would be used to reduce water consumption as required by Building Regulations.
POLICY WM DM1 WASTE MANAGEMENT		
POLICY The policy seeks to minimise the production of waste and that waste collection can take place from the kerbside (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The matters are addressed in the supporting statements: • Refuse & Waste Management Plan • Transport Statement
POLICY QE SP1 QUALITY OF THE ENVIRONMENT		
POLICY The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposed redevelopment of this previously non-conforming site in the heart of Angmering will improve the quality of the environment generally and of the adjoining properties.
POLICY QE DM4 CONTAMINATED LAND		
POLICY 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 (Author's summary).	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposal would not create any issues which would increase pollution. The application is accompanied by a site investigation report and should planning approval be granted, the site would be remediated.
ANGMERING NEIGHBOURHOOD PLAN 2014-2029		
HD1: BUILT-UP AREA BOUNDARY HD1: BUILT-UP AREA BOUNDARY		
POLICY Policy HD1 seeks to limit new development to within the village boundaries and in order to provide at least 100 dwellings for the period 2014-2029, the Chandlers site is allocated to achieve at least 20 dwellings. (Author's summary).	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposed resettlement is on the allocated site and would achieve in excess of the minimum requirement in a manner which would enhance the site. In addition, the provision age specific accommodation could release presently under occupied dwellings in the village.
HD3: HOUSING MIX PROPOSALS		
POLICY The policy seeks that residential schemes address need and be biased towards smaller dwellings and that at least 25% of dwellings should meet Lifetime Home Standards or its equivalent (Author's summary).	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposed retirement living scheme provides 1- & 2-bedroom units which will meet the growing need for such accommodation as identified in the SHMAA. All units are of an appropriate size to meet the needs of occupiers and in this respect the average occupancy rate is

		approximately 1.1-1.3 persons per unit.
HD4: MATERIALS HD5: BUILT FORM HD6: HOUSING LAYOUT & DESIGN HD7: HOUSING DENSITY		
POLICY In broad terms the policies seek that developments are appropriate in context with regards to matters of scale, materials, layout and landscaping. (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION As detailed previously in response to the Local Plan policies, the proposals are explained in detail in the DAS and Heritage Statement. The proposed development, both residential and commercial, is sympathetic to its location and will significantly enhance the site and its surroundings.
HD8 PARKING FOR NEW		
POLICY The Developments The Plan supports the WSCC parking standards and encourages all new development to follow them.	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposed development makes provision for both the residential element and the retail store. Full details for the parking rationale are set out in the Transportation Statement.
HD9: PHASING OF RESIDENTIAL DEVELOPMENT		
POLICY The policy seeks that new housing will only be permitted where it can be demonstrated that there is the necessary capacity in the community and physical infrastructure and services are available to support the increase in population.	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposed development is on an allocated housing site, the benefits of the proposed accommodation are commented elsewhere in this statement including the health and well being of its prospective residents.
ER1: RETAIL PROVISION		
POLICY The policy seeks to prevent the loss of retail facilities (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The site abuts but is just outside of the Core Area and is not directly impacted by the policy. But nonetheless the provision of additional retail space within the village will enhance its sustainability
ER2: LOCAL EMPLOYMENT		
POLICY There will be a general presumption against the loss of locations that provide employment within the Parish, e	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION In view of the growth of the village, the proposed retail store will create some employment opportunities which would be likely to be filled by local residents.
TM1: LOCAL HIGHWAYS		
POLICY Proposals for new development shall demonstrate that adequate and satisfactory	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposed development fully addresses the impact on highways as detailed in the

provision has been made to mitigate the impact of the traffic generated both during development and on completion.		Transport Statement.
EH1: DEVELOPMENT IN THE CONSERVATION AREA		
The policy seeks that sufficient details should accompany applications within or affecting the setting of the Conservation Area (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The application is supported by a DAS and Heritage Statement which explain the design and its positive impact on the CA and adjoining LB.
EH3: FLOOD PREVENTION		
POLICY Angmering is categorised as at a medium to high risk of flooding from rainfall runoff from the land and is also a groundwater emergence zone and for these two criteria have been assigned the highest risk categories.	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION Please see the FRA and Drainage Statement.

OTHER BACKGROUND DOCUMENTS

Conservation Area SPD 2003. This document sets out an explanation of CA and does not raises anything new not considered by adopted policies.

Arun Parking Standards 2020. This sets out the Council 'sparking standards, but in the case of residential schemes it deals with this in terms of bedrooms rather than acknowledging how age restricted developments differ from general developments. The parking rationale of the scheme is detailed in the Transport Statement.

Arun Design Guide 2021. This is a design guide which reiterates general design principles. The document dos not raise any issues no already commented upon in planning policies and responded to via the DAS, Heritage Statement and other supporting documents.

Accommodation for Older People and People with Disabilities Guidance. It does not appear that this document has yet been adopted but nonetheless sets out the importance of meeting the accommodation needs of this growing demographic group.

NEIGHBOUR RELATIONSHIPS & AMENITY SPACE

McCarthy and Stone is the market leader in the provision of this form of specialised housing and therefore in assessing the functional requirements of its purchasers/residents. Put simply, if the Company were to provide sub-standard accommodation in this regard, then quite simply, it would experience difficulty in selling the

apartments and in maintaining its position in this specialised field of housing. Additional information on this issue can be submitted if required.

About the neighbouring properties, the proposed development would remove a non-conforming use from the area and improve their amenities as well as the setting of the Conservation Area and the adjoining Listed Building

CAR PARKING & ACCESS

It is considered that the level of car parking proposed on this site, will accommodate the needs of the proposed development. Further information is set out in the Transport Statement.

CONCLUSION

The redevelopment of this previously developed site should be optimised, commensurate with environmental considerations and such is, of course, supported by extant Local and Government guidance.

This is best achieved by the beneficial redevelopment of the site. This well designed development would provide for much needed specialised accommodation within an urban location therefore, helping to prevent new housing on greenfield land.

The proposed development represents a sustainable development, with social and planning benefits, both for potential residents and the community as a whole. In summary, these are:

Balanced View of Policy and Other Material Considerations

- The development contributes to the wide spectrum and much needed housing for the older population. In doing so it thereby helps to prevent new housing on greenfield land and freeing up of existing under-occupied stock.
- A highly sustainable form of development that optimises the use of valuable previously developed land.
- Brings land into more beneficial use. Maximises use of scarce residential land.
- Net environmental benefits in built form, streetscene and character.
- The provision of much-needed owner occupied accommodation that helps meet a recognized housing needs of an ageing population and the housing stock that is ill equipped to deal with its needs.

- Greater security and convenience and reduced feelings of isolation and vulnerability. Improved independence, health and well-being whilst maintaining an independent lifestyle.
- Most residents have family and friends in the locality and are able to remain an important part of the core of the local community.
- Reduced demand on public sector resources and health services. Residents manage better and spend fewer nights in hospital. Reduced impact upon NHS resources.
- Increases the availability of much needed family housing in areas of shortage boosting the supply in the local housing market.
- A land use, which is entirely passive and a “good neighbour”.
- A new building that provides substantial energy efficiency advantages over the existing and most open market residential schemes.
- Boost the local economy by the spending power of the residents.
- Makes a positive contribution to the Conservation Area and the setting of the adjoining Listed Building.

National, strategic and local planning policies all place strong emphasis on the need to re-cycle previously developed land, in order to safeguard greenfield sites and land in other sensitive areas. The proposed development successfully achieves a balance between the potentially competing objectives of development whilst respecting townscape setting and residential amenities.

This proposal will:

- Accord with national planning guidance in relation to sustainable development;
- Accord with the relevant and material provisions of the development plan; and
- Not cause any demonstrable harm to any interests of acknowledged importance.

Furthermore, there are significant planning merits associated with the proposals, which further sustainability goals. Accordingly, the presumption in favour of granting planning permission in the NPPF should prevail.

ENCLOSURE 1:

**SAFE AND SECURE – THE APPROACH TO SAFETY
AND SECURITY**

Safe & Secure.

The concept of designing a Development to Safe & Secure standards, is to provide an enhanced security perimeter, with greater emphasis on the external shell of the building. This should encourage people with criminal intentions to stay away from the Development, so that our owners are able to enjoy their surroundings in peace and safety, free from the fear of crime.

Main Entrance Door.

Shall be manufactured with enhanced security in mind, from hardwood. All glazing to be toughened glass to Part N critical zones, toughened to the outer pane in all other areas. All beading shall be internal, pinned and glued. The door should be supplied with matching hardwood frame and any matching side-lights shall be to the same standard as the main door and frame.

Doors and frames shall be designed and manufactured with full regard to DDA requirements.

Locking mechanism shall consist of a lock, certified to BS3621, or BS EN 1303 grade 3. The cylinder mechanism shall be 10 pin high security euro cylinder with a patented master key system. New keys will only be available from the patent holder, or their agents. In certain developments, an electronic tag may be used for authorised access in lieu of a key and euro cylinder combination. Access will also be authorised from the owners apartment electronically, via the door control system. Exit through the main entrance door will be via thumb turn control. A heavy duty door closer shall be fitted, to maintain the door in the closed position when not being used.

Where there is a need for automatic opening doors, they shall be manufactured from powder coated aluminium, to a security standard equal to, or above the standard of wooden doors. Access will normally be via an electronic tag, or via the owners apartment, electronically.

CCTV allowing visual and audio identification shall be linked to an access control system, allowing entry phone and door release from within owners flats, or by the House Manager.

Other external exit doors.

Often referred to as "shoppers Doors", shall be to the same security standard as the main entrance door, but will not include any remote access facility.

Fire exit doors.

Shall be to the same manufacturing standard as the main entrance door, but with no external access. Exit shall be via an approved panic latch. There will be an electrical connection between the fire door and the fire panel, to provide an audio and visual "open alert" alarm, if the fire door is open. All glazing to be toughened glass to Part N critical zones, toughened to the outer pane in all other areas.

Refuse room doors.

The internal refuse room door from the development into the refuse area shall be to the same standard as other exit doors. The external refuse room doors shall be a pair of 30 minute fire rated framed ledged and braced doors, with monkey tail bolts to one leaf and the locking mechanism shall consist of a lock, certified to BS3621, or BS EN 1303 grade 3. The cylinder mechanism shall be 10 pin high security euro cylinder with a patented master key system. No other form of door, such as louvred, are acceptable. The lock shall have the facility to change the combination, if required to maintain security.

Patio Doors.

Patio doors shall be to the enhanced security standard BS7950 and fitted with a multi-point deadlocking system, comprising hook bolts and/or shoot bolts. Internal ironmongery shall include operating handle and lock cylinder which shall be to the same standard as the main entrance door. No external means of securing or opening to be provided to prevent residents using them as a means of access/egress on ground floors. All glazing to be toughened glass to Part N critical zones, toughened to the outer pane in all other areas. Hinges shall incorporate an anti-lift security device. All glazing beads shall be internal. Contacts shall be fitted to each opening light, connected to the apartment alarm panel.

French Doors.

French doors shall be to the enhanced security standard BS7950 and fitted with a multi-point deadlocking system, comprising hook bolts and/or shoot bolts. The fixed leaf will be secured by a bolt mechanism. Internal ironmongery shall include operating handle and lock cylinder, which shall be to the same standard as the main entrance door. No external means of securing or opening to be provided to prevent residents using them as a means of access/egress on ground floors. Hinges shall incorporate an anti-lift security device. All glazing to be toughened glass to Part N critical zones, toughened to the outer pane in all other areas. All glazing beads shall be internal. Contacts shall be fitted to each opening light, connected to the apartment alarm panel.

Communal windows & Doors

There are some communal areas, such as the residents lounge, where window & Door contacts connected to the alarm panel may not be appropriate. In these circumstances an open alert alarm may be fitted, which may be overridden by key operation controlled by the House Manager.

Windows.

Ground floor windows, or those windows that would be deemed easily accessible from the ground floor, shall be manufactured to enhanced security standard BS 7950 for UPVC windows. The equivalent standard for timber is BS644, or BWF Timber window accreditation scheme.

All glazing to be toughened glass to Part N critical zones, toughened to the outer pane in all other areas. All glazing beads shall be internal. All windows are considered potential fire escape windows, therefore restrictors will only be used for top hung kitchen windows. Contacts shall be fitted to each opening light, connected to the apartment alarm panel where the window is on the ground floor, or easily accessible externally.

Flat Entrance Doors.

Shall be of solid construction to an enhanced security standard and comply with 30 minute fire rating. The door should be fitted with a door viewer at a height of 1,350mm, to facilitate final security prior to door opening. Locking mechanism shall consist of a lock, certified to BS3621, or BS EN 1303 grade 3. Anti drill devices are not required. The cylinder mechanism shall be 10 pin high security euro cylinder with a patented master key system. An appropriate boxed keep shall be used within the door jam. Entrance may only be via the patented security key, though exit may be via a thumb turn mechanism. The door should be fitted with a letter plate which is fire rated, fitted with a fire "collar" and fixed at least 400mm from the lock mechanism. The door will be closed by a Perko, or similar approved door closing device.

Extra Flat security.

All external opening windows and doors to the ground floor and those areas easily accessible by external means, will be fitted with intruder alarm contacts, which are connected to the intruder alarm within each flat. The alarm panel will be connected to the master intruder alarm panel to facilitate action, should the owner be absent from the premises. It should be noted that PIR's are not considered a suitable substitute for door and window contacts, as they may set off a false alarm if the owner moves around the apartment during the night, when the alarm is set.

External security lighting.

Lighting should be designed to illuminate external doors and vulnerable areas, such as the car park and landscaped areas. Control will be via a photo electric cell, or a time switch and lamps should be fitted with low energy lamps. Where lighting bollards are used within the car park, they should be a minimum of 1 metre away from the edge of the parking area to prevent damage when parking a vehicle. It is also good practice to position lighting to reduce glare, light pollution and deter vandalism. In certain circumstances a sensor controlled time limited light may be fitted to illuminate car park areas.

External Flood Lighting should not be fitted to the main build but be installed on posts or similar separated from the building. External lighting should not cause a nuisance to adjacent flats.

Layout and access.

The footprint of the building, vehicular and pedestrian access, should be designed in such a way to ensure visual openness. Careful consideration should be given to features such as change of road surface, or path materials, by colour or texture to create a psychological barrier between public access and legitimate access by owners and their visitors.

Boundaries.

Boundaries to the front and side should show a clear demarcation between public and private areas. Walls, fences and planting should be kept low to maintain clear visibility.

Side and rear boundaries are normally more vulnerable and require more defensive solutions. Walls and fences should be a minimum of 1.8 metres high, except where more open fencing would provide more effective surveillance. Fencing with the addition of trellis affixed may provide better visibility.

Careful consideration should be given to planting thorny bushes and shrubs in more vulnerable areas. All planting should comply with MSL Standard Specifications

Climbing Aids

Special consideration should be used to design out anything that could assist with climbing to gain access to a property, such as boundary walls close to doors and windows, low flat roofs, balconies etc.

Car Parking

Car parking areas should be designed to provide maximum visibility from adjacent and overlooking flats. Lighting should be adequate to provide good visibility, as detailed in security lighting above. If garage parking is included, the garage door should face towards the apartment windows to provide useful surveillance.

Planting and Landscaping

The landscape design and planting arrangements should be considered integral with security and surveillance and to provide an attractive external environment.

Spiny or thorny plants should be considered for areas of potential risk, with broader leaved, lower growing plants to provide more natural surveillance. Care should be taken to avoid the creation of natural hiding places.

Carefully selected trees and shrubs can be used to "green up" environments, providing horizontal and vertical interest, without adding to the crime risks, or the use for climbing. All planting should comply with MSL Standard Specifications

Seating and External Furniture.

All seating, garden furniture, planters and pots should be sited with good visibility within the development. Where possible, they should be security marked and securely fixed to prevent/ discourage theft.

Gable Ends

Blank gable ends should be avoided and at least one window, at first floor or above, should be included within the design, to provide views over the area, where possible within Planning requirements.

Regulations

This security specification has been written to take into account the requirements and recommendations of all currently known regulations, including Health & Safety Executive, Fire Regulations and the Disability Discrimination Act. For the avoidance of any doubt, should there be any conflict between the security specification and any regulation, the regulation shall prevail.