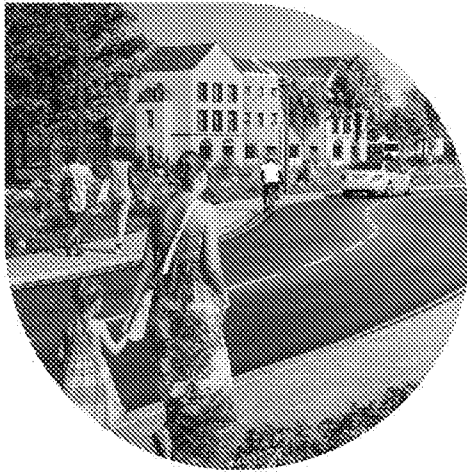




August 2019



GLADMAN

PLANNING STATEMENT

LAND OFF ARUNDEL ROAD, ANGMERING
ARUN DISTRICT COUNCIL

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Table of Contents

1	Introduction.....	1
1.1	Scope of the Planning Statement.....	1
1.2	Planning History and Previous Application.....	3
1.3	The Proposals.....	4
1.4	EIA Screening	9
1.5	Scope of the Application.....	9
2	Site and Locational Sustainability.....	12
2.1	Site Location.....	12
2.2	Site Sustainability	13
2.3	Location and Sustainability Summary.....	15
3	The National Housing Crisis	17
3.1	Introduction.....	17
3.2	National Delivery of Housing.....	17
3.3	The Local Authority Position	19
4	The Development Plan.....	22
4.1	Introduction.....	22
4.2	The Development Plan: Weighting	23
4.3	Five-Year Housing Land Supply	24
4.4	Arun District Local Development Plan.....	26
4.5	The Emerging Non-Strategic Allocations DPD	37
4.6	The Angmering Neighbourhood Plan	38
4.7	Summary of the Development Plan.....	40
5	Sustainable Development: National Planning Policy.....	41
5.1	Introduction.....	41
5.2	The Presumption in Favour of Sustainable Development.....	41
5.3	Building a Strong and Competitive Economy.....	42
5.4	Promoting Sustainable Transport.....	43
5.5	Delivering a Wide Choice of High-Quality Homes.....	45
5.6	Achieving Well-Designed Places	46

5.7	Conserving and Enhancing the Natural Environment.....	48
5.8	Meeting the Challenge of Climate Change.....	49
5.9	Conserving and Enhancing the Historic environment	49
5.10	Summary.....	49
6	Planning Balance and Conclusions	51
6.1	Introduction.....	51
6.2	Benefits.....	52
6.3	Harms.....	56
6.4	Planning Balance and Conclusions	56

APPENDICES

Appendix 1

Section 106 Draft Head of Terms

1 INTRODUCTION

1.1 Scope of the Planning Statement

1.1.1 This Planning Statement has been prepared to accompany an outline planning application made by Gladman Developments Ltd (Gladman/GDL) for a residential-led, mixed-use development on land off Arundel Road, Angmering. The proposed development comprises the erection of up to 160 residential dwellings with new dedicated point of access, associated infrastructure and landscaping; up to 557 sq m of commercial (B1 / B2) floorspace in the form of starter units with associated infrastructure and separate point of access; and, the provision of land for the expansion of existing sports pitch provision to facilitate the formation of a community sports-hub, following the demolition of an existing dwelling and commercial units.

1.1.2 The full description of development is all follows:

“Outline planning for the erection of up to 160 dwellings with public open space, landscaping and sustainable drainage systems (SuDs) and vehicular access point from Arundel Road; together with up to 557 square metres (6,000 square feet) of B1/B2 units with associated parking provision and vehicular access point from Arundel Road; and land made available for expansion of current sports pitch provision to form a sports-hub (following the demolition of existing commercial units and one bungalow). All matters reserved except for means of access.”

1.1.3 The starting point for the determination of this application is the statutory Development Plan, comprising the Arun District Local Plan (2018) and Angmering Neighbourhood Plan (2015) [ANP]. In this context, the proposal to direct additional housing growth to Angmering is consistent with the adopted spatial strategy for Arun. The current intention is that the requisite additional housing growth in Angmering will be planned for through a review of the current ANP, which is being

prepared by Angmering Parish Council [APC]. This proposal has been prepared in close consultation with APC, which is in support of the proposed development.

- 1.1.4 This Planning Statement explains why the development is needed in this location and the significant social, economic and environmental benefits that will be secured through its delivery. To that end, the Statement demonstrates the suitability and sustainability of the proposals, which includes the delivery of new homes to meet identified local housing need; the creation of new, high-quality commercial starter units to meet the needs of contemporary business and the District's modernising economy; and, the release of land for the purposes of facilitating the expansion of the current playing pitch provision and creation of a multipurpose sports hub for the enjoyment of local and wider District residents. Drawing on supporting technical documentation, the Statement confirms that any adverse impacts of the development (which are very limited) would be significantly and demonstrably outweighed by its benefits (which are significant).
- 1.1.5 Details of a previous refused planning application for solely residential development on the application site are provided in this Planning Statement, accompanied by an overview of Gladman's revised proposals. The current development proposal is significantly different and responds to the reasons for refusing planning permission for the earlier application proposal. The planning context for the consideration of the application is also different. Furthermore, the current proposals have strong support from APC, which is currently tasked with identifying how required growth in Angmering should be accommodated (through a review to the ANP).
- 1.1.6 Finally, this Planning Statement sets out why it is appropriate to grant outline planning permission and bring forward development now at this site, having regard to the relevant provisions of the statutory Development Plan and other material considerations.

1.2 Planning History and Previous Application

- 1.2.1 The planning history of the site includes only one application similar to that now proposed. The planning application¹ was submitted by Gladman to Arun District Council (ADC/ the Council) in March 2018. This application sought outline permission for up to 200 dwellings with accompanying public open space, landscaping, sustainable urban drainage system (SuDs). It also included provision for one full sized football pitch, demolition of industrial units and one residential dwelling, and vehicular access point from Arundel Road. The application was in outline with all matters reserved except for access.
- 1.2.2 APC were engaged in advance of this earlier application but made it clear they were not supportive of the proposals and would make representations in objection to the application.
- 1.2.3 Arun District Council validated the application on 15th March 2018, and it was later refused under delegated authority, which the Council confirmed by notice on 7th September 2018. A summary of the five reasons for refusal (RfR) is provided below:
1. Intrusion into the countryside and consequential impact on the character of the area and use of the land for agricultural purposes.
 2. Absence of a signed Section 106 legal agreement to secure contribution towards infrastructure required to mitigate any development impacts.
 3. Failure to identify an adequate affordable housing tenure split.
 4. Insufficient information provided to demonstrate that the development would not have an unacceptable impact on the highway network.
 5. Loss of an established employment site caused by development on the site.

¹ LPA Reference: A/36/18/OUT

- 1.2.4 The refused application was prepared in the context of the previous, now superseded saved policies of the Arun Local Plan 2003 Plan. The determination was made in the context of the then recently adopted Arun Local Plan 2011-2031, with the Council able to demonstrate a five-year housing land supply. Furthermore the decision was made in the context of objections to the proposal by APC.
- 1.2.5 The current application proposals are materially different to that previously refused. In particular, the scale of housing development is reduced; there will be improvements to the employment provision within the site; and additional land is to be released to facilitate the creation of a new sports hub in Angmering (which has been a long term aspiration and will in itself deliver significant social and economic benefits). The planning context for the consideration of the proposals is also materially different. Furthermore, the current proposals have been prepared in consultation with APC and positively respond to the preferred option for additional development in Angmering.

1.3 The Proposals

Preparation of the Proposals

- 1.3.1 The preparation and submission of the subject planning application follows the Council's determination of an earlier refused application to which the above RfR applied.
- 1.3.2 In responding to the RfR and following ongoing discussions with APC, the revised proposals materially reduce the number of dwellings; retain some employment land and propose qualitative improvements to the employment space; and increase the amount of land available for sports provision and remodelling. APC has confirmed its support for the proposals and their willingness to identify the site for allocation in their review of the ANP.
- 1.3.3 Pre-application discussions with ADC initially elicited a policy only response, prepared without a proper understanding of the detailed discussions that had taken place

between Gladman and APC or APC's planned approach to delivering development requirements in Angmering.

- 1.3.4 A subsequent face-to-face meeting on the 7th March 2019 between GDL, ADC and APC allowed a better understanding of the proposals and their context, including APC's support for the proposals and the positive contribution that the proposed development package would have on helping ADC deliver its aspiration for a new sports hub at Palmer Road. The meeting also allowed the opportunity for more detailed aspects of the proposal to be explained (many of which had arisen out of discussions with APC) for example the inclusion of a separate access to the commercial units, which can also be used to facilitate access to the future sports hub (providing the potential for the Palmer Road access into the sports pitches to be closed, addressing existing issues on Palmer Road), and a new pedestrian crossing to be provided on Arundel Road, adjacent CofE Primary School.
- 1.3.5 APC has confirmed to us that it carried out a public consultation exercise on the 30th May 2019, seeking comments on the current GDL proposals for this site. We understand from APC that the public feedback from this sessions was unanimously positive. APC subsequently confirmed their continued support for the GDL proposals and indicated they would be supportive of an early planning application to ADC.

Proposal Details

- 1.3.6 The drawings submitted as part of this outline planning application for approval are:
- Site location plan (drawing number: CSA/3467/108)
 - Proposed site access layout (drawing number: 2020-F01 and 2020-F03)
- 1.3.7 To summarise, the application proposal comprises (following the demolition of existing industrial units and one bungalow) the following:
- Up to 160 residential dwellings (including 30% affordable housing delivered in accordance with adopted planning policy);
 - Newly formed priority access onto Arundel Road serving the residential dwellings;

- Green infrastructure framework allowing for appropriate landscape and ecological mitigation measures to be applied;
- New publicly accessible green space, including new recreational footways and a Locally Equipped Area for Play (LEAP);
- Provision of up to 6,000 sq ft (557 sq m) of Class B1 / B2 commercial floorspace (which on an indicative basis could provide 6 no. 1,000 sq ft commercial / employment starter units) to be accessed from the existing access point off Arundel Road;
- Land for sports provision, capable of providing two new full size football pitches, to be gifted to ADC through the proposed development package to help facilitate the delivery of a community sports hub;
- Sustainable urban drainage system (SuDs) in the form of an attenuation basin designed in accordance with national planning policy guidance to manage surface water and provide new habitats for wildlife; and

1.3.8 The illustrative Development Framework Plan (DFP) for the site demonstrates how the built development will be set within a framework of open space and green infrastructure. Areas of onsite public open space will provide the opportunity for formal and informal recreation and will include a newly located Locally Equipped Area of Play (LEAP). Existing landscape features will be retained, wherever possible, and any loss of vegetation will be mitigated elsewhere onsite.

1.3.9 The proposals would deliver up to 160 new, high-quality homes of various size and tenure in response to the Council's latest evidence on housing needs, as well as a policy compliant provision of 30% affordable housing (up to 48 affordable homes) contributing towards meeting the District's affordable housing needs. This is seen to be particularly beneficial when set against the growing housing affordability issues and stagnating delivery of affordable homes in the District, which has resulted in demand outstripping supply and an acute need for additional affordable homes in Arun (see the Affordable Housing Statement).

- 1.3.10 The proposals also involve the removal of various utilitarian structures on the eastern part of the site that are currently in employment use, including a caravan storage area. These existing commercial units support relatively low levels of employment and economic activity, and project a poor outward visual appearance on to the surrounding locale. Notwithstanding an overall quantitative loss in employment land, there will be a significant qualitative improvement in the commercial floorspace that would be secured through the delivery of this scheme. The replacement of the existing antiquated structures with approximately six² modern, high-quality commercial/employment 'starter units' and associated infrastructure will increase the longevity of the commercial area, help to meet the needs of contemporary local businesses and generate additional socio-economic benefits, including increased employment opportunities.
- 1.3.11 The proposals (through the gifting of land capable of providing 2 full size football pitches) will help deliver a new sports hub in accordance with the District and Parish Councils' vision and objectives for the Palmer Road Recreation Ground, as detailed in the Arun Playing Pitch Assessment (2016), the emerging Arun Public Open Space Standards Supplementary Planning Document (SPD), and the made Angmering Neighbourhood Plan (2015). The emerging Public Open Spaces Standard SPD specifically identifies the Palmer Road Recreation Ground in Angmering as one of three priority community sports hub sites in the District. These 'hub sites' are of District-wide importance and offer the opportunity to create multi-sport facilities that provide a quality offer and range of provision.
- 1.3.12 The proposals will facilitate the remodelling of the playing pitch provision including additional football pitches and the construction of a multipurpose community sports hub and associated infrastructure within the area of the existing Palmer Road Recreation Ground. It is envisaged that new playing pitches and the sports hub will

² Based on the illustrative arrangements, which shows the proposed 6,000 sq ft of commercial space comprising 6 no. 1,000 sq ft starter units. It is proposed that flexible space will be delivered; however, to respond to the needs of local businesses and the 6,000 sq ft of commercial space could be provided in a number of ways.

form a focal point for the local community, promoting a greater sense of community and encouraging healthy and active lifestyles for existing and future residents.

- 1.3.13 The sports hub proposals comprise of changing rooms, toilets, reception and office, kitchen, bar and café, treatment room/drop-in room for doctor/dentist, club room/hall/function room and outdoor patio/terrace space. The sports hub will also secure economic benefits through increased local employment and income generation. These benefits (of District-wide importance) are unlikely to be realised without the gifting of land, as proposed through the application development package.
- 1.3.14 Access to the site will be served by two separate accesses. The residential development will be served by a newly formed priority controlled junction off Arundel Road, while the existing site access will serve the commercial/employment parcel. The existing access for the commercial element will be modified so it can cater for pedestrians, by providing 2-metre footways on both sides, that would simply tie into existing footway provision on the western side of Arundel Road. This would also serve as an access point and new route into the prospective sports hub. The submitted Transport Assessment confirms that the required visibility splays can be achieved and that the site access junction will operate comfortably within capacity in both the morning and evening peak periods with the proposed development traffic.
- 1.3.15 The car parking provided for the sports hub (not forming part of this outline application) would serve both as a suitable parking area for users of the sports pitches and facilities and also those dropping children off in the morning and collecting in the afternoon from St Margaret's C of E Primary School. This will help to reduce congestion on Arundel Road by removing parked vehicles at school drop off and pick up times.
- 1.3.16 The current informal crossing adjacent the site to the school will be upgraded to a controlled crossing. This will help to improve the existing pedestrian environment and provide a safe pedestrian access between the primary school and any future sports

hub car parking and onsite facilities. The location of this crossing corresponds with the existing pedestrian link through to the sports pitches.

- 1.3.17 The proposals, by providing an alternative access point, allow for the closure of the existing vehicular access from Palmer Road into the sports pitches, thereby reducing the amount of visiting traffic through the residential area to the south of the sports facilities and addressing what we understand to be a local highways issue.

1.4 EIA Screening

- 1.4.1 As the application proposals are for urban development on a site of more than 0.5 hectares (ha), the proposals fall under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. Such projects only require an EIA if the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 1.4.2 The Local Planning Authority will be required to screen the proposals as part of its legal requirements. It is contended by the applicant that an Environmental Statement is not required, as the proposed development is not considered to give rise to likely significant effects on the environment that require consideration through the EIA process.
- 1.4.3 Support for this position is drawn from the ADC's EIA screening opinion adopted in respect of the earlier outline planning application (for a higher number of dwellings), which was not considered to constitute EIA development.

1.5 Scope of the Application

- 1.5.1 The outline planning application is seeking approval in principle for the development proposals³. Approval is sought for the means of access to the site through this planning application.

³ Approval in principle is sought for the use of the area of land to the south west of the site (to be transferred to form part of a new sports hub) for sports and recreation purposes.

1.5.2 Details of the parameters of the development for which outline planning application is sought are included within the Design and Access Statement (DAS), ensuring that an appropriate level of information is provided on the scale, nature and general arrangement of the development proposed at the outset.

1.5.3 The following documentation has been submitted in support of the planning application:

- Planning Statement
- Development Framework Plan
- Socio-Economic Sustainability Statement
- Design and Access Statement
- Transport Assessment and Travel Plan
- Affordable Housing Statement
- Statement of Community Involvement
- Noise Assessment
- Ecological Impact Appraisal
- Ecological Mitigation and Enhancement Strategy
- Landscape and Visual Impact Assessment
- Odour Impact Assessment
- Air Quality Assessment
- Arboricultural Assessment
- Utilities Statement
- Flood Risk Assessment and Outline Drainage Strategy
- Heritage Desk-Based Assessment
- Phase 1 Preliminary Risk Assessment
- Foul Drainage Analysis Report

- 1.5.4 The information contained within the application document provides the framework for future detailed Reserved Matter planning applications⁴.

⁴ It is anticipated that the detailed proposals for the area of land to the south west of the site (to be transferred to form part of a new sports hub) will be subject to a subsequent application for the wider sports hub proposals.

2 SITE AND LOCATIONAL SUSTAINABILITY

2.1 Site Location

- 2.1.1 The 9.10 hectare (ha) site lies adjacent to the existing residential development on the edge of Angmering.
- 2.1.2 The settlement of Angmering lies in an accessible location along the A27 between Portsmouth and Brighton, approximately 21km west/east respectively. It also lies approximately 5.6km from the centres of Worthing and Littlehampton to the east and west respectively.
- 2.1.3 The Site is shown outline in red in Figure 1

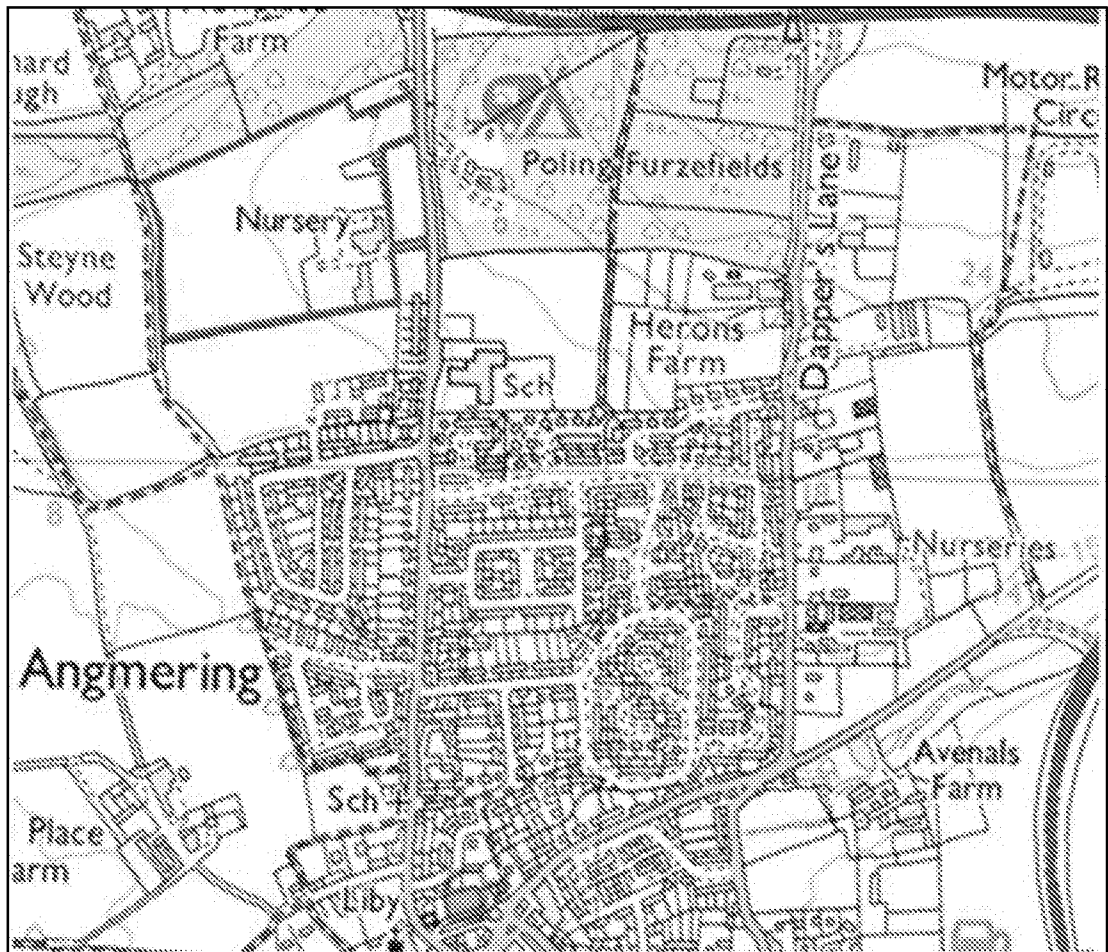


Figure 1: Location Plan

- 2.1.4 The site is in an accessible, sustainable location and will be able to make a valuable contribution to the supply of housing in Arun District.

2.2 Site Sustainability

- 2.2.1 The application site comprises 9.10 ha of land in mixed-use. Approximately 2.45 ha of the site is previously developed (brownfield) land, comprising a single residential dwelling and a small commercial area consisting of various utilitarian structures and hardstanding and including an area used for caravan storage. The small commercial area is bound by low hedging along its northern and western boundaries, with a continuation of the site's existing boundary vegetation running along its southern boundary. The eastern part of the site lies immediately adjacent to a linear area of separately owned land. This land has planning permission⁵ for 9 dwellings which are currently under construction.
- 2.2.2 The site is bounded to the north by a small woodland copse and a residential property. To the west, the site is bounded by a well-established hedgerow beyond which lie agricultural fields. The southern boundary consists of a chain-link fence beyond which is a line of well-established trees which help to define an adjacent area of playing fields and a sports club. To the east of the site is Arundel Road and an existing housing commitment, as referred to above. The site is currently accessed via a tarmac access road from Arundel Road.
- 2.2.3 Located on the northern edge of the settlement, the site is around 0.60 km from the centre of Angmering. The situation of the site close to the centre of Angmering means that it is well located to a number of local amenities including primary services as well as leisure facilities. There are also employment opportunities within the settlement, provided by local shops and pubs, as well as more established employment centres located not too distantly from the site in the settlements of Worthing and Littlehampton. The existing pedestrian infrastructure in the vicinity of the site is of a good standard and will facilitate safe and direct pedestrian linkages between the site and local facilities, and to the surrounding area.

⁵ Application reference: A/131/16/OUT

- 2.2.4 Accessibility between the site to local destinations is also of a good standard, with the nearest frequently served bus stop to the site located approximately 600 metres to the south on Arundel Road. A further bus stop is located to the south east of the site on Chantyfield Road. These bus stops are served by the 'no. 9 service' which provides a connection to surrounding settlements, as well as to local amenities and destinations in Angmering. The nearest railway station to the site is Angmering Railway Station, which is situated approximately 2.5km to the south of the site and is accessible via a 9-minute bus journey and within easy cycling distance. This railway station offers eight services per hour to destinations such as London Victoria and Southampton Central. It is noted that the availability of bus and rail services presents people with a choice of how they might travel, with travel by public transport a real alternative to private, single-occupancy vehicle trips.
- 2.2.5 The site, as previously indicated, lies adjacent to existing residential development in Angmering. It is well-related to the settlement and it is contained by physical features at its boundaries. Views to the site are largely confined to vantage points located to the south and west, with the surrounding woodland to the north east enveloping the site and restricting views from the South Downs National Park and heavily filtering views in the more immediate locality.
- 2.2.6 Overall, the location of the site ensures that future residents would have easy access to a wide range of local amenities near their residence. The level of available public transport is good, and residents would have a choice of transport modes to access services and facilities. For more information relating to public transport and highways issues, please see the accompanying Transport Assessment.
- 2.2.7 Angmering is recognised as a settlement capable of accommodating and supporting further growth in the adopted Development Plan, as discussed later in section 5. The village of Angmering is considered to represent a suitable, sustainable location for residential development. The proposed development represents a well-planned, sustainable and logical extension to the village.

2.3 Location and Sustainability Summary

2.3.1 The site is located at the northern edge of Angmering. It covers approximately 9.10 ha of land which is currently in mixed-use. From a sustainability perspective, there are multiple factors that make the site a sustainable location for development. These include:

- The site is well contained within the landscape and important trees and other landscape features will be retained;
- The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact;
- The site comprises land in agricultural use, but its usefulness for agricultural purposes is limited and its loss would not be significant in Framework terms (Framework 170);
- The site has a low ecological value and based on the evidence submitted with the application (Ecological Impact Appraisal prepared by CSA). The loss of habitat would not be significant and mitigation and net biodiversity gains can be readily achieved;
- The application site falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding);
- There are no designated heritage assets within the site, and the proposed development would not significantly affect the setting or significance of any nearby listed buildings.

2.3.2 The DAS prepared by CSA and submitted in support of the application sets out how the site can accommodate the quantum of development proposed in a manner which reflects the local landscape character and the setting of Angmering.

2.3.3 In summary, the application site presents an opportunity for the sustainable growth of Angmering:

- The land to which the development proposals relate is not of high environmental value.
- The site is suitable for residential development in terms of its general location and characteristics.
- There are opportunities through development to improve the environmental conditions of the area.

3 THE NATIONAL HOUSING CRISIS

3.1 Introduction

- 3.1.1 This section of the Planning Statement will set out the context to the national objective to boost significantly the supply of housing, the response required of the Local Planning Authority and the observed effects on affordability in the District.

3.2 National Delivery of Housing

- 3.2.1 It is widely acknowledged at all levels that there is a housing crisis in this country, which has arisen as a direct consequence of too few houses being completed to keep pace with a growing population and household formation rates.
- 3.2.2 The solution to address this pressing national issue is a sum of the individual parts, i.e. every local authority must ensure that a five-year supply of housing is achieved urgently against up to date, objective assessments of their needs.
- 3.2.3 The House of Lords Select Committee on Economic Affairs said:

“To address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future. One million homes by 2020 will not be enough.”⁶

- 3.2.4 In recognition of the national housing crisis, the government responded in the 2017 Autumn budget with a commitment to deliver 300,000 new homes a year. Since the start of the financial crisis, delivery of new homes has not yet come close to delivering this nationally recognised need:

⁶ House of Lords Select Committee on Economic Affairs 1st Report of Session 2016–17 HL Paper 20 Building more homes

Year	Net Additional Dwellings ⁷
2007/08	223,534
2008/09	182,767
2009/10	144,870
2010/11	137,394
2011/12	134,896
2012/13	124,722
2013/14	136,605
2014/15	170,693
2015/16	189,645
2016/17	217,345
2017/18	222,194

3.2.5 Having regard to the evidence on past completions, it is self-evident that a significant step change is required in the delivery of new homes, in order to get anywhere close to meeting requirements and preventing the housing crisis from being exacerbated further.

3.2.6 In order to reach the government's targets, Kit Malthouse MP, then Minister of State for Housing, Communities and Local Government recently said in The Times, "If we want to achieve 300,000 homes a year, we need to have one million homes in production and four to five million in planning."⁸

3.2.7 In 2017 consultancy Lichfield also identified that in order to meet the 300,000 a year delivery target, a constant stock of between 900,000 and 1.1 million of implementable planning permissions would be required⁹.

3.2.8 This application therefore responds to the national housing crisis and the need to grant additional planning permissions in order to meet the government's objectives. In addition, as will be explained later in this Planning Statement, this proposal

⁷ Ministry of Housing Communities & Local Government *Table 122: housing supply; net additional dwellings, by local authority district, England 2001-02 to 2017-18* (Accessed January 2019)

⁸ Anne Ashworth (2019) 'Kit Malthouse: It's time to 'keep calm and keep building'', *The Times*, 4th January 2019

⁹ Nathaniel Lichfield and Partners (2017) *Stock and Flow, Planning Permissions and Housing Output*, NLP, January 2017

responds to the local housing issues in Arun which are contributing to the problem overall.

3.3 The Local Authority Position

3.3.1 In line with the national trend, the supply of housing in Arun District has fallen short of demand in recent years. When assessed against the 2011 base date of the adopted 2018 Arun Local Plan (ALP), it is clear that housing delivery rates have not been as forthcoming as predicted by the Council. The Council's latest Authority Monitoring Report (AMR) (June 2019) states that a housing delivery shortfall of 537 dwellings has accrued between 2011 and 2018. This shortfall is symptomatic of a longer-term housing delivery problem in Arun District, with the Council in recent years being frequently unable to demonstrate a supply of housing sites sufficient to meet the District's housing requirements (e.g. Housing Implementation Strategy, March 2017).

3.3.2 One effect of the national housing crisis and the historical shortfall in housing completions in Arun is the profound impact it has on household formation and affordability. The following information, based on DCLG Live tables, demonstrates that there is increasing unaffordability of housing in the District.

Year	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Earnings Ratio	9.74	8.38	9.63	9.97	9.44	9.61	11.03	11.08	12.06	12.26	12.13

3.3.3 Mortgage lenders typically offer loan to income ratios from 3.25 annual salary up to a cap at around 4.5 times annual salary. Often this requires a deposit and loan to value (LTV) ratio of 95%. As can be seen from the data, house prices fluctuated during the 2008-2013 recession; however, house prices to lower quartile earnings have increased dramatically since 2013.

3.3.4 The Affordable Housing Statement accompanying this planning application demonstrates that house prices in Arun District are higher and incomes lower than national averages. This is thought to have led to a serious District-wide affordability

problem and a significant drop in the number of first time buyers, with analysis suggesting that the drop in first time buyers between 2001 and 2011 may have been as large as 40%. In relation to the delivery of affordable housing, the analysis presented in the aforementioned statement highlights that the Council is delivering only a minor proportion of the overall affordable housing need. The consistently missed affordable housing target in the District has resulted in the need for additional affordable homes in Arun being particularly acute.

- 3.3.5 A further cause and consequence of the shortfall in housing delivery that has amassed during the local plan period (i.e. since 2011) is that the Council is unable to demonstrate a robust five-year housing land supply (5YHLS). It is the Government's objective to boost significantly the supply of housing. In order to maintain supply and deliver of housing, national planning policy requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five-years' worth of housing against their housing requirements. The Council's latest AMR (June 2019) confirms that there is only a 4.7-year land supply in the District, which is below the five-year requirement. Results of the Government's 2018 Housing Delivery Test (HDT) identify that ADC delivered only 91% of its housing requirement over the previous three-year (2015/16-2017/18) period. With a HDT percentage of 95% constituting a "pass", the Council has failed to deliver the required number of homes and will be formally required to put an Action Plan in place to boost delivery.
- 3.3.6 The policy implications of this housing delivery situation are discussed in more detail in section 4.
- 3.3.7 Irrespective of the 5 year land supply position, the adopted Local Plan relies on the delivery of at least 1,250 dwellings on 'Non-Strategic Sites'¹⁰. The Local Plan anticipates that these will be identified through Neighbourhood Plans or a Non-Strategic Site Allocations DPD. The timescales for the preparation of a Non-Strategic Site Allocations DPD has slipped significantly and reviews of Neighbourhood Plans

¹⁰ sites of less than 300 dwellings, which are not currently identified (i.e. are not existing commitments or allocations) in the plan

are taking longer than anticipated in some cases (including in Angmering despite the best efforts of APC). Sustainable non-strategic sites that comply with the spatial strategy should be released for development now to help minimise the exacerbation of the housing land supply position.

4 THE DEVELOPMENT PLAN

4.1 Introduction

- 4.1.1 At the time of writing, the adopted Development Plan applicable to the site comprises the Arun Local Plan (ALP) 2011-2031 and Angmering Neighbourhood Plan (ANP) 2014-2029.
- 4.1.2 The proposals are in conformity with the spatial strategy of the ALP in that they direct a housing-led mixed-use development to a sustainable location. It is also the case that delivering housing on the application site will aid the Council in meeting its housing policy requirement to deliver at least 1,250 additional dwellings on non-strategic sites (less than 300 dwellings) not allocated in the ALP. It is the Council's intention for a significant proportion of this minimum 1,250 housing target to be delivered at Angmering.
- 4.1.3 As a matter of principle, the proposals direct development to a location that is outside (although adjoined with) the currently adopted built-up area boundary for Angmering. The application site is thus designated as 'countryside' for the purposes of decision-taking. Proposals for major housing development in the countryside are not specifically supported within the adopted Development Plan (i.e. housing development is not included within Policy C SP1 criteria a-f). However, any conflict between the proposals and the Development Plan in this respect is focussed and limited in its extent. Furthermore, it is considered inevitable that, in order for the strategic requirement for a minimum of another 1,250 dwellings to be delivered on non-strategic sites to be met, currently defined built-up area boundaries (including in Angmering) will need to 'flex'¹¹.
- 4.1.4 The weight to be afforded to the adopted development boundaries is further reduced by the Council's lack of a demonstrable five-year supply of deliverable housing sites. This position renders those Development Plan policies most important for the

¹¹ The Local Plan para. 7.2.8 makes clear that the boundaries may need to be reviewed, for example where Neighbourhood Plans are being reviewed or in response to a 5 year housing land supply shortfall.

determination of the application as out of date. This includes policies relating to the adopted built-area boundaries (Policy SD SP2) and development in the countryside (Policy C SP1).

4.1.5 The retention of land on the site for employment uses and replacement of the existing employment premises with modern, high-quality 'starter units', would contribute to the Council's strategy for sustainable economic growth in the District. The provision of land to facilitate the remodelling of the existing playing pitch provision and formation of a multipurpose sports hub (and associated infrastructure) at the Palmer Road Recreation Ground is also in accordance with the Council's Arun Playing Pitch Assessment (2016), the emerging Arun Public Open Space Standards Supplementary Planning Document (SPD), and the made Angmering Neighbourhood Plan (2015).

4.1.6 As previously stated, the emerging SPD identifies the Palmer Road Recreation Ground as a priority area of development and investment. Similarly, the ANP seeks to explore the delivery of enhanced recreational facilities and open space at the Palmer Road Recreation Ground.

4.1.7 The remainder of this section describes the adopted Development Plan for the site and considers the relevance and weight that should be attributed to the policies contained within it.

4.2 The Development Plan: Weighting

4.2.1 Section 38(6) of the Town and Country Planning and Compulsory Purchase Act 2004 places a statutory duty on local planning authorities to determine planning applications in accordance with the development plan unless material planning considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development.

4.2.2 The Framework is an important material planning consideration but does not change the statutory status of the Development Plan as the starting point for decision making. Paragraphs 2 and 12 of the Framework confirm:

2. **Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.**

12. **The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.**

4.2.3 Further, in determining the weight to relevant policies the guidance at paragraph 213 of the Framework confirms:

“...existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).”

4.2.4 The planning application should be considered in this context.

4.3 Five-Year Housing Land Supply

4.3.1 The supply of available and deliverable sites for housing in Arun District is a material consideration in determining the weight to relevant policies for the supply of housing.

4.3.2 Paragraph 11 and footnote 7 of the Framework states:

“Plans and decisions should apply a presumption in favour of sustainable development.

...

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, 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.”

...

“This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Transitional arrangements for the Housing Delivery Test are set out in Annex 1.”

4.3.3 The Framework requires local planning authorities ensure a continued supply of land to meet five years’ worth of housing requirements, with a delivery buffer of either 5%, 10% or 20% (moved forward from later in the plan period) depending on past performance. Local authorities should also make every effort to redress previous underperformance within the immediate 5-year period (commonly referred to as the ‘Sedgefield Approach’) and the delivery buffer should be applied to both the requirement and the accrued backlog.

4.3.4 The Council acknowledge that they (at the time of writing) cannot demonstrate a 5YHLS. The Council’s latest Annual Monitoring Report 2017-2018 (June 2019) indicates that there is a 4.7 year supply¹² of deliverable housing sites in the District. In accordance with paragraph 11 of the Framework, Development Plan policies that

¹² The Council’s 5 year land supply position seems to have been calculated on the basis of an incorrect housing requirement for years 2016-2021 (i.e. utilising 930dpa rather than 1,120 dpa). The shortfall has thus been underestimated and the claimed supply position over-estimated.

are most important for the determination of the application are out of date. It is the case, therefore, that, in line with the provisions of NPPF paragraph 11 and ALP Policy SD SP1, the presumption in favour of sustainable development – the “titled balance” – is engaged.

- 4.3.5 It is also clear from the Council’s own updated housing trajectory¹³ that projected housing completions for 2018-2019 and 2019-2020 will continue to fall significantly short of the Local Plan requirement, exacerbating the shortfall in housing completions against policy requirements.

4.4 Arun District Local Development Plan

- 4.4.1 The Arun District Local Plan (ALP) was adopted in July 2018. It sets out a spatial vision, objectives and strategy for guiding development and growth in the District (excluding the area within the South Downs National Park) over the period from 2011 to 2031.
- 4.4.2 The ALP comprises multiple ‘strategic policies’ that together express the overall strategy for the District with regard to several development and policy areas, such as employment, retail and housing development, with further detail for management development contained in ‘development management’ policies. Relevant policies for this application are discussed below.
- 4.4.3 **Policy SD SP1 Sustainable Development** states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It moreover notes that the Council will work-proactively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland).

¹³ AMR (June 2019) Appendix 7

- 4.4.4 Further to the above, the Council cannot demonstrate a 5YHLS and paragraph 11(d) of the NPPF is engaged, as confirmed by footnote 7. Furthermore, there are no (footnote 6) policies in the Framework of relevance to the proposal that provide a clear reason from refusing the proposed development (and disengage the 'tilted' presumption). In accordance with paragraph 11(d), the appropriate policy test for the application is that planning permission should be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the proposed development. It is demonstrated in this statement that any adverse impacts are limited and do not come close to outweighing the benefits of the proposal, which are significant.
- 4.4.5 **Policy SD SP2 Built-up Area Boundary** stipulates that development should be focused within the built-up area boundaries (as identified on the Policies Map) and will be permitted, subject to consideration against other policies in the ALP. The policy is permissive of development within current boundaries, but silent on development outside. Thus, no conflict arises with Policy SD SP2 as a consequence of the proposed development. In any event, it is considered inevitable that the currently identified built up area boundaries will need to 'flex' in order to accommodate the development requirements of the plan.
- 4.4.6 **Policy C SP1 Countryside** establishes that outside current built-up area boundaries land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development in the countryside will be permitted where it is in accordance with the criteria set out by this policy, which includes development for recreational, green infrastructure, and rural economic diversification purposes; and development that accords with other policies in the plan that refer to a specific type of development. In this context, the proposed sport and recreation and employment development elements¹⁴ of the proposal are specifically supported by Policy C SP1.

¹⁴ Compliance with Policy EMP DM1 is addressed below. It is noted here however that the redevelopment of existing employment areas (including those outside of current built up area boundaries) to upgrade or modernise premises and make more efficient use of under used sites is supported by Policy EMP DM1.

- 4.4.7 As a matter of principle, it is acknowledged that Policy C SP1 does not specifically support major housing development. However, part of the housing element of the proposal is to be delivered on previously developed land, which is encouraged by policies of the Local Plan (including Policy SD SP1 (g)). Furthermore, it is clear that the built up area boundaries (to which the application of Policy C SP1 is intrinsically linked) will need to flex in order to meet housing requirements. The current development boundaries should not be seen as inviolable in this context.
- 4.4.8 In accordance with paragraph 11(d) of the NPPF, the Council's lack of a demonstrable 5YHLS renders the most important policies for determining this application out of date. This includes policies relating to built-up area boundaries (Policy SD SP2) and the countryside (Policy C SP1), which are intrinsically linked. This reduces the weight that should be afforded to any conflict with Policy C SP1 that arises as a consequence of the development.
- 4.4.9 In conclusion in respect of Policy C SP1, it is considered that any conflict that arises is limited and the weight to be afforded to it for the purposes of development management is significantly reduced having regard to other material planning considerations.
- 4.4.10 **Policy EMP SP1 Strategic Economic Growth** states that the Council, with partners, will promote the sustainable growth of the District's economy, including seeking to protect and enhance existing employment sites and premises in order to meet the needs of modern business (Policy EMP SP1 (f)).
- 4.4.11 The thrust of the Local Plan policy framework on economic growth is job retention and creation. This is clear from the reasoned justification for the policies. In particular, paragraph 8.4.2 of the plan states:

"The Local Plan will assist the creation of new jobs in Arun in a variety of ways, both through the allocation of land for employment uses, but also by less direct means, for example, by promoting urban and town centre regeneration and supporting local services in rural areas; enhancing visitor facilities; supporting expansion of education and training; and facilitating improvements to transport

and ICT networks. The planned strategic housing developments can also assist by including provision for on-site employment, increasing the local demand for services and creating a wealth base for the area. It will be important to adopt a co-ordinated approach where all development proposals are considered in terms of their potential for job creation, whether direct or indirect."

- 4.4.12 Policy EMP SP1 and its sister 'employment & enterprise' policies (e.g. Policy EMP SP2 Economic Growth Areas and EMP SP3 Strategic Employment Land Allocations) are underpinned by the Arun Local Plan Economy and Background Technical Paper (March 2017), which forms part of the ALP evidence base. This technical paper provides the latest evidence on the supply and demand of employment land across the District over the plan period from 2011 to 2031. The headline finding of the technical paper is that there will be a surplus of employment land available for Arun District (and more locally) across the plan period, even when assessed against the Council's aspirational demand scenario on past take-up.
- 4.4.13 Notwithstanding the above, part of the application site comprises existing employment land and premises (although not specifically allocated as employment land in the Local Plan) albeit, a significant proportion of the employment area is used as part of a caravan storage business (which has a very low employment density, employing just 1 person); and, the existing premises on the site are in a fairly poor state of repair. Nevertheless, Policy EMP SP1(f) and Policy EMP DM1 are relevant in this context. These policies generally seek to protect and enhance existing employment sites to maintain an adequate supply of good quality commercial sites and to meet the needs of business and the local economy.
- 4.4.14 The application proposal anticipates the redevelopment of part of the existing employment area to provide up to 6,000 sq ft (557 sq m) of new, high quality B1 / B2 commercial floorspace. It is anticipated that this will take the form of small starter units, although the space can be flexible to provide 'move on' accommodation. It is acknowledged that there will be a net loss in the overall employment land area. However, the existing premises are generally low value, in a poor state of repair and

support low levels of economic activity and employment. As a consequence of the proposed development, there will be significant qualitative improvements to the commercial floorspace provided, increasing the longevity and effectiveness of the site for employment generating purposes.

- 4.4.15 The proposed development will also assist in delivering a new sports hub in Angmering. The Council's intention is that the Palmer Road site will be remodelled and upgraded to provide a much more extensive leisure offer, which will be specifically managed and operated by a leisure company or trust. The new sports facility (once delivered in accordance with the aspirations of ADC, APC and the objectives of the emerging district wide sports strategy) will provide a significant number of new employment opportunities in the area. In this context, it is important to note that the new sports hub with remodelled and increased sports and playing field provision is unlikely to be delivered without the gifting of land through the proposed development package.
- 4.4.16 In addition to the foregoing, it is noted that the residential element of the proposal itself will secure a significant level of economic activity and jobs growth (both directly and indirectly). This is set out in the accompanying Socio-Economic Statement.
- 4.4.17 In conclusion, the proposed development will have a positive impact on economic growth and employment provision overall and the employment generating function of the site will not be undermined by the proposal, when compared with the current position. In this context, it is not considered that any material conflict arises with the relevant provisions of Local Plan Policy EMP SP1 and Policy EMP DM1.
- 4.4.18 **Policy H SP1 Housing Requirement** identifies that within the plan period 2011-2031 at least 20,000 new homes will be accommodated in the District. This is equivalent to 1,000 dwellings per annum, although the policy does adopt a stepped housing trajectory split over four five-year periods. The stepped requirement for the current period (2016-2021) is 1,120 dwellings per year. In this context, it is noted from the Council's latest monitoring report that completions have consistently failed to meet

this requirement since 2016 by a significant margin¹⁵. The backlog in completions against planned requirements is clearly growing and additional land needs to be released urgently in order to address this and prevent the issue from becoming exacerbated further.

- 4.4.19 The reasoned justification for the housing policies (paragraph 12.1.12) of the Local Plan makes clear that where the Council's monitoring evidence demonstrates that if annual delivery is less than the annualised requirement or projected completion rate in two consecutive years (based on the trajectory at picture 12.1 of the Local Plan) a review of the plan will be undertaken. This supports our position that intervention and the release of additional land is required now.
- 4.4.20 An important part of the Local Plan housing delivery strategy (which is already failing) is to deliver at least 1,250 dwellings on sustainable non-strategic sites (which are not allocated in the Local Plan) as well as an additional 847 dwellings through windfall sites. In terms of delivering the minimum requirement of 1,250 dwellings across the District (of which it is generally accepted by ADC and APC that Angmering, as one of the most sustainable settlements in the district, will make an important contribution towards meeting), it was anticipated that these would be identified through new or updated Neighbourhood Plans or a Non-Strategic Site allocations DPD. In this context, it is noted that the preparation of a Non-Strategic Site allocations DPD has been delayed for at least 12 months. Also, despite the best efforts of APC, the review of the ANP is unlikely to be finalised for approximately 12 months. In this context, it is considered that additional land needs to be released urgently in order to address requirements.
- 4.4.21 The proposed release of the application site on the edge of Angmering will assist the Council in meeting the Policy H SP1 housing requirement in accordance with the broad spatial strategy and housing delivery strategy.

¹⁵ Completions for 2016-17 were 622 (a shortfall of 498 dwellings); and for 2017-2018 were 704 (a shortfall of 415 dwellings). The Council's projected completions for 2018-19 are 519 (a shortfall of 601 dwellings); and 558 for 2019-20 (a shortfall of 562).

4.4.22 The proposed development is compliant with a range of other policies in the ALP. These include the following.

- **Policy GI SP1 Green Infrastructure and Development** states that the existing Green Infrastructure Network must be considered at an early stage of the design process for all major development proposals. All major development must be designed to protect and enhance existing Green Infrastructure assets, and where compatible with nature conservation objectives seek opportunities to connect existing Green Infrastructure assets with the coast, the South Downs National Park or to the District's inland villages.

The illustrative Development Framework Plan for the site demonstrates how the built development will be set within a framework of open space and green infrastructure. Building on the diversity and multifunctionality of Green Infrastructure assets, the proposals include the provision of a new sustainable urban drainage (SuDs) network; new tree and meadow planting; a new woodland belt; a newly located onsite locally equipped play area (LEAP) and open space to promote informal play; and recreational routes throughout the site. Together these Green Infrastructure assets will improve the social integrity and ecological value of the site, with new recreational routes helping to connect the development to the District's wider Green Infrastructure Network.

- **Policy LAN DM1 Protection of Landscape Character** requires development within the setting of the South Downs National Park (SDNP) to the conservation of that setting, including views into and out of the SDNP. Development will not be permitted where there would be harmful effects on these considerations. The village of Angmering is located at the eastern edge of Arun District, with the southern boundary of the SDNP running to the north of the application site along the A27 (Arundel Road).

The accompanying Landscape and Visual Impact Assessment (LVIA) demonstrates that there are limited opportunities for views towards the site from the SDNP. This is due to the topography of the surrounding land and woodland

enclosing the site of the north and east. The site is not visible from public vantage points within the SDNP to the north of the A27, with views restricted by the rising landform and the many copses and blocks of woodland in the near or middle distance.

It is demonstrated within the application submission that impacts of the proposed development on landscape character are wholly acceptable.

- **Policy H DM1 Housing Mix** stipulates that major developments will be expected to provide a mix and range of housing in terms of size, types and tenure to reflect local housing needs and demands. **Policy AH SP2** requires development of 11 residential units or more to provide 30% affordable housing. The proposed development would provide a range of open market and affordable housing to meet the needs of Angmering. A total of 30% of delivered housing would be affordable, thus complying with Policy AH SP2. The final housing mix would be finalised at the Reserved Matters stage.
- **Policy D SP1 Design** indicates that all development proposals should 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. While design is a matter reserved for future determination, the accompanying Design and Access Statement (DAS) demonstrates that the proposed development would be sympathetic to the character of the site and its surroundings, be of scale and design appropriate its setting, and utilise materials to reflect the local vernacular and architectural heritage. The proposed development provides a framework and the parameters for a high quality and well-conceived development in compliance with Policy D SP1.
- **Policy ECC SP1 Adapting to climate change** requires development to be located and appropriately designed to adapt to impacts arising from climate change, such as the increased probability of tidal and fluvial flooding. **Policy W**

DM2 Flood Risk establishes that development in areas at risk of flooding will only be permitted where a series of criteria have been satisfied. This includes a requirement for a site specific Flood Risk Assessment (FRA) to have been prepared, which incorporates climate change allowances and demonstrates that the development will be safe and will reduce flood risk overall.

The submitted FRA, which considers the effects of climate change, confirms that the site lies within Flood Zone 1 and is at low risk of fluvial or tidal sources. The proposed scheme includes measures for managing the foul and surface water requirement arising from the development. The FRA, in conjunction with the Foul Drainage Analysis, demonstrates that the development can be safely implemented without increasing overall flood risk onsite and elsewhere.

- **Policy HWB SP1 Health & Wellbeing** requires that all development is designed to maximise the impact it can make in promoting healthy communities and reducing health inequalities. The indicative DFP and DAS establish a high-level response to the site context, establishing the quality parameters of the design, construction and operation of the development. Together, they demonstrate how the scheme will deliver a high-quality sustainable and salutogenic, health promoting residential environment. The proposed newly located LEAP, open spaces for informal play, and recreational routes which will physically connect the onsite open spaces and surrounding local area, will promote a healthy, active and integrated community for Angmering. A healthy community will also be promoted through the release of land to facilitate the development of a sports hub, complete with sport pitches and accompanying facilities.
- **Policy OSR SM1 Open Space, Sport & Recreation** seeks to protect and enhance existing open space, sports and cultural facilities, and requires that new housing development, regardless of size, makes provision for and/or contributions to recreation and leisure facilities. The DFP highlights that an onsite provision green infrastructure will be delivered, which will include a LEAP and provide new well-connected open spaces for future inhabitants of the

development and the surrounding population. In addition, land will be made available for the expansion of the current sports pitch provision to form a sport-hub. The proposed development could therefore facilitate the expansion and enhancement of recreational opportunities and sports amenities. The gifting of land to enable the expansion of the existing playing pitch provision at the Palmer Road Recreation Ground is made in lieu of planning obligations for offsite playing pitch provision.

- **Policy T SP1 Transport and Development** states that the Council will ensure that developments provide safe access on to the highway network and contribute to highway improvements and promote sustainable transport. Development proposals must be supported by an effective and deliverable Transport Assessment, which demonstrates that the highways effects of development on the local and the strategic road network can be satisfactorily mitigated, and a Travel Plan. **Policy T DM1 Sustainable Travel and Public Rights of Way** requires that new development must prioritise 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. Access to alternative modes of transport including public transport services, the public right of way and cycle networks, must be available and accessible to all members of the community.

The Transport Assessment (TA) that supports this application demonstrates that the proposals will not have an unacceptable impact or give rise to any highways-related issues on the local road network (both in terms of road safety and capacity). The TA confirms that the site can be accessed safely and efficiently, and the proposed access arrangements will not compromise highway safety. Any contribution necessary to mitigate the impact of the development on the local or strategic road network will be addressed through a Section 106 Agreement.

More broadly, the TA indicates that the site benefits from existing pedestrian infrastructure in its vicinity providing safe linkages to the surrounding area. The

safe pedestrian environment will be improved further by upgrading the existing informal crossing adjacent to St Margaret's C of E Primary School to a controlled crossing. Additionally, the site benefits from its location in close proximity to bus stops, accessible within a short walk, and which provide services to local destinations. A Travel Plan (submitted separately as part of the planning application) will be implemented to encourage the use of non-car and other sustainable modes of transport to meet the aims and aspirations of national and local policy and assist in delivering a sustainable development.

- **Policy HER SP1 The historic environment** requires that development proposals conserve or enhance the historic environment of the District. **Policy HER DM1 Listed Buildings** states that development proposals affecting statutory Listed Buildings will be required to preserve or enhance their historic character, qualities, special interest and setting. The accompanying Heritage Desk-Based Assessment provides information with regards to the significance of the historic environment archaeological resource of the site and its surroundings. It is conclusive in its finding that, although recorded remains within and in the vicinity of the site suggest archaeological potential, there is currently no evidence to suggest onsite remains of a significance that would preclude development. Furthermore, residential development on the site is not anticipated to harm the heritage significance of the Newport Farmhouse (Grade II*) building to the north of the site through changes to its setting. It is likewise not anticipated to harm the heritage significance of the Angmering Conservation Area or Decoy Cottage (Grade II) through changes to setting. The proposed development thus complies with Policy HER SP1 and HER DM1.
- **Policy ENV SP1 Natural Environment** encourages and promotes the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. More specifically, **Policy ENV DM5 Development and biodiversity** states that development schemes should seek to achieve a net gain in biodiversity and protect existing

habitats on site. Development schemes should be appropriately designed to minimise and mitigate adverse impacts on and facilitate the emergence of new habitats through the incorporation of elements of biodiversity (e.g. bat and bird boxes) and provision of a network of green spaces onsite.

The proposals are supported by an appropriate Ecological Appraisal and Ecological Mitigation and Enhancement Strategy. The Ecological Appraisal finds that, following the implementation of avoidance, mitigation and compensatory measures as outline in the Ecological Mitigation and Enhancement Strategy, the development is not anticipated to result in any significant adverse residual effects to important ecological features. It would also adhere to all relevant nature conservation legislation, as well as national and local planning policy. Net gains in biodiversity and benefits for wildlife in the form of additional habitats are also achievable via the implementation of the proposed mitigation and enhancement strategy.

- **Policy INF SP1 Infrastructure provision and implementation** states that the Council 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 the development and the existing community. Where required, the applicant is prepared to enter into constructive dialogue with the Council to agree any planning obligations required to mitigate the impact of development provided these are compliant with CIL regulations.

4.5 The Emerging Non-Strategic Allocations DPD

- 4.5.1 Arun District Council is currently preparing a Non-Strategic Sites Allocations (NSS) DPD to cover the period up to 2031.
- 4.5.2 While the ALP sets out the strategic pattern of growth and development in the whole District, it identifies that land suitable for further development is required to be identified. Table 12.1 of the ALP contains a commitment to allocate land for at least 1,250 dwellings in a separate NSS DPD, supplemented with any new or updated

Neighbourhood Plans. The NSS will allocate non-strategic sites¹⁶ in accordance with the ALP and set a housing target for any Neighbourhood Plans where appropriate. December 2018 correspondence¹⁷ from ADC's Planning Policy Team to Angmering Parish Council indicates that no allocations for housing at Angmering will be included in the NSS DPD. Instead, Angmering Parish Council will aim to allocate land for at least 117 dwellings in their updated Neighbourhood Plan (see below).

- 4.5.3 The Council's latest Local Development Scheme (LDS) 2018-2021 sets out details for the preparation of the NSS DPD. The timetable in the LDS identifies that NSS DPD should have been subject to (Regulation 18) consultation in Spring 2019, with pre-submission (Regulation 19) publication in Autumn 2019 and anticipated adoption in winter 2020. To date, the Council has not carried out consultation on any NSS DPD documents and communication with ADC indicates that its preparation has slipped drastically, resulting in delay in the adoption of the NSS DPD.
- 4.5.4 As set out above, the delay in the preparation of the NSS DPD undermines the Local Plan delivery strategy and risks exacerbating the shortfall in housing provision against plan requirements.

4.6 The Angmering Neighbourhood Plan

- 4.6.1 The Angmering Neighbourhood Plan (ANP) was made on 11th March 2015. It technically forms part of the statutory Development Plan, setting out a vision, objectives and policies for planning and controlling land use development in the designated Angmering neighbourhood area over the plan period from 2014 to 2029.
- 4.6.2 Notwithstanding the above, the current ANP was prepared on the basis of the saved policies in the former 2003 Arun Local Plan, which had an end date of 2011, and the policies in what was the emerging Local Plan in 2014. Paragraph 13 of the Framework,

¹⁶ 'Non-strategic' is defined in the ALP as allocations for residential development under 300 dwellings. Therefore, the NSS DPD will identify sites under the 300 dwellings threshold.

¹⁷ Non-Strategic Site Allocations Development Plan Document and Neighbourhood Plans Summary Position. Letter from Arun District Council Planning Policy Team to Arun District Parish Councils. 12th December 2018.

and Planning Practice Guidance (PPG)¹⁸, establishes that the Neighbourhood Plan must be in general conformity with the strategic needs and priorities of the adopted Development Plan.

4.6.3 Framework paragraph 14 provides that in situations where the tilted balance is engaged (as is the case here) for applications, the adverse impact of allowing development that conflicts with a neighbourhood plan is likely to significantly and demonstrable outweigh the benefits, where all of the following criteria apply:

- a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;
- c) the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
- d) the local planning authority's housing delivery was at least 45% of that required over the previous three years.

4.6.4 It is clear that, in the circumstances of this case, not all of the criteria in paragraph 14 are met, not least because the ANP was made and became part of the Development Plan well over two years ago.

4.6.5 Overall, it is considered that the current ANP is out of date and needs to be reviewed to accord with the strategic policies of the July 2018 Arun Local Plan. This position is accepted by ADC and APC. APC is making progress with a formal review to the current ANP and it is acknowledged that additional land for housing (over and above the strategic allocations identified in the Local Plan) needs to be identified. It has been confirmed through consultations between APC and Gladman that the release of the subject site as proposed represents the preferred option for addressing identified

¹⁸ PPPG Paragraph: 039 Reference ID: 41-039-20161116

housing requirements for Angmering and that the development package will support other strategic aspirations for the ANP, including the realisation of the aspiration for a new sports hub.

4.7 Summary of the Development Plan

- 4.7.1 In the light of the above, the development proposal accords with all parts of the Development Plan that are up to date. The proposal focusses development on the edge of a sustainable settlement in broad compliance with the spatial strategy and settlement hierarchy. Whilst the site is located outside of the current development boundaries for Angmering, it is considered that these need to 'flex' in order to meet the non-strategic development requirement of the development plan. The proposal will assist the Council in meeting the strategic housing policy requirements of the plan.
- 4.7.2 The strategic policies of the Local Plan establish a requirement to deliver at least 1,250 dwellings through 'non-strategic' sites. It is accepted that a proportion of this will need to be directed to Angmering. The intention is that this will be planned for through the emerging ANP review. Consultations with APC have confirmed that the subject site is the preferred option for accommodating the requisite additional housing growth; and that the other benefits the development package will deliver, including helping facilitate the delivery of a new sports hub, will support the local and district wide sports strategy and the wider objectives of the emerging ANP. Whilst the ANP review is at a relatively early stage, there is a need to release additional land for housing in order to meet development requirements.

5 SUSTAINABLE DEVELOPMENT: THE NATIONAL PLANNING POLICY FRAMEWORK

5.1 Introduction

5.1.1 The National Planning Policy Framework (NPPF/the Framework) was published in March 2012 and sets out the Government's planning policies for England and how these are expected to be applied. The Framework was revised by the Government in July 2018, and subject to further minor clarifications in February 2019.

5.1.2 This section of the Planning Statement sets out why the planning application meets with the objectives of the Framework in delivering sustainable development.

5.2 The Presumption in Favour of Sustainable Development

5.2.1 At the heart of the Framework is the 'presumption in favour of sustainable development' (paragraph 10). For decision-taking this means approving development where it accords with an up-to-date development plan, or where there are no relevant development plan policies or where the policies which are most important for determining the application are out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate development should be restricted (paragraph 11).

5.2.2 ADC is unable to demonstrate a robust five year housing land supply. In this case, paragraph 11(d) of the Framework (i.e. the 'tilted balance') is engaged. This means that the appropriate policy presumption for the purposes of considering this application is that planning permission should be granted unless any adverse impacts that arise from the development proposal significantly and demonstrably outweighs the benefits of the scheme.

5.2.3 The relevant technical reports that accompany this planning application demonstrate that there are no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposals. Rather, the balance tips firmly in favour of a grant of planning permission. Further, the application

site is not the subject of any of the designations cited within footnote 6 of the Framework and therefore policies do not apply which indicate the presumption should be disapplied.

- 5.2.4 This section describes how the development proposals meet the relevant objectives of the Framework.

5.3 Building a Strong and Competitive Economy

- 5.3.1 The Framework is clear that the government is committed to delivering sustainable economic growth identifying that planning policies should, “positively and proactively encourage sustainable economic growth” (paragraph 81).

- 5.3.2 Housing development is a key component of economic growth and this is fully recognised in Government policy and more recently the White Paper – Fixing our broken housing market (2017), which states on page 15:

“If we fail to build more homes, it will get ever harder for ordinary working people to afford a roof over their head, and the damage to the wider economy will get worse.”

- 5.3.3 Through the development of the residential element of the proposal alone, a significant amount of investment will be made to the area in terms of the construction value of the project and associated spend during the construction period. The construction industry and house building in particular make an important contribution to both the local and national economy in terms of job creation. The accompanying Socio-economic Sustainability Statement estimates the following key benefits arising from the housing element of the proposal:

- Construction spend - £20.3 m
- GVA over the build period - £6.8 m
- Resident annual expenditure - £5.8 m
- Council tax - £2.7 m over 10 years
- New Homes Bonus - £800,000 over a 4 year period

- 5.3.4 The provision of high-quality housing in Angmering is central to the achievement of sustainable economic growth across Arun District and is fully supported by the requirements and advice of the Framework; indeed, paragraph 80 is clear that, “significant weight should be placed on the need to support economic growth through the planning system”.
- 5.3.5 Additional economic benefits will arise from the construction value of the commercial element of the scheme. Furthermore, the replacement of the existing, old commercial units within the site with new, high quality, flexible B1 / B2 floorspace will increase the longevity of the commercial element of the site and help ensure that the site continues to provide an employment generating function.
- 5.3.6 The proposed development package will also help facilitate the delivery of a new sports hub on the adjoining site, which will create new direct and indirect employment opportunities in the area.

5.4 Promoting Sustainable Transport

- 5.4.1 At paragraph 102, the Framework requires LPAs to consider transport issues from the earliest stages of the plan-making process and development proposals, encouraging:

“...opportunities to promote walking, cycling and public transport use...”

- 5.4.2 At paragraph 103, the Framework requires significant development to:

“...be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

- 5.4.3 Angmering contains a wealth of facilities and services which provide a major service role and focal point for the village. The proposed development would contribute to sustaining, and expanding, the range of available facilities in the village. There are a

range of local amenities located within a 20-minute (1,600m) walk from the application site, including: a local shop, primary school, a pharmacy, a pub, a library and a church. The site is also accessible by cycle, with the settlements of Littlehampton, East Preston, Ferring and Rustington capable of being cycled to within an approximate 25-minute journey time. Additional amenities and centres of employment can be found in the nearby settlements of Worthing, Littlehampton, Arundel and Shoreham, all of which are accessible by bus.

- 5.4.4 The nearest frequently served bus stop to the site is located to the south on Arundel Road, with an approximate walking distance of 600m. A further bus stop is located to the south east of the site on Chantyfield Road. For residents of the site, ease of access would be facilitated by the short walking time (less than 10 minutes) and conducive pedestrian environment, which will be further improved through upgrading the existing informal crossing adjacent St Margaret's C of E Primary School to a controlled crossing. Servicing the bus stops on Arundel Road and Chantyfield Road is the 'no. 9 service', which operates at a frequency of 1 service per hour and provides a link towards Arundel, Shoreham-by-Sea, East Preston, Worthing and Lancing. The no.9 service also provides convenient access to Angmering Railway Station, which in turn allows for connections to a multitude of other destinations – including Brighton, Portsmouth, Littlehampton, Southampton and London.
- 5.4.5 Access to the site will be served by two separate accesses. The residential development will be served by a newly formed priority controlled junction off Arundel Road, while the existing site access will serve the commercial/employment parcel. The existing access for the commercial element will be modified so it can cater for pedestrians, by providing 2-metre footways on both sides, that would simply tie into existing footway provision on the western side of Arundel Road. This would also serve as an access point and new route into the prospective sports hub.
- 5.4.6 The Transport Assessment (TA) undertaken in support of this application confirms that the proposed development would not have a severe impact on the operation of the highway network, both in terms of safety and capacity. It shows the site to be

sustainable when considering access to and from the site (including to local amenities, facilities and services) by modes of travel other than the private car, particularly walking, cycling and public transport. The access strategy is also considered to maximise access via sustainable modes. Additionally, the accompanying Travel Plan includes sustainable transport measures to be implemented at the site. This includes personal travel planning, making sure residents are aware of the Travel Plan and its aims to ensure sustainable transport objectives are delivered through action provision, and encouraging walking, cycling and the use of public transport.

5.5 Delivering a Wide Choice of High-Quality Homes

The Need for Market and Affordable Housing

- 5.5.1 There is a wealth of evidence from figures at the highest levels of the Government, the Bank of England and internationally, within the European Commission and International Monetary Fund, which demonstrate that there is a consistent and pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable. In the foreword to the White Paper 'Fixing the Broken Housing Market', the then Prime Minister Theresa May stated:

"Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.

Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, it is difficult to get on the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000."

- 5.5.2 The government outlined its aim to build 300,000 homes per year in the Autumn Budget 2017. Delivery of this site will contribute to this delivering the housing the country needs.
- 5.5.3 In addition to a pressing need for new market homes in Arun, there is a significant need for affordable housing, as outlined previously within section 3.3 of this

statement. The scale of affordable housing need in LPA is leading to a chronic shortage of much needed new homes.

- 5.5.4 The UK has a persistent problem with inadequate housing supply, which has led to low income and middle income families being priced out of the housing market. National Government recognise that house price inflation is getting to dangerous levels and that building new homes is necessary in order to address this issue. The delivery of 30% affordable homes should be given significant weight.

Ensuring Choice in the Competition for Land

- 5.5.5 The Framework sets out the Government's key housing objective, which is, "to boost significantly the supply of housing". Paragraph 73 sets out how LPAs should achieve this boost in the supply of housing, including a requirement to provide a delivery buffer of 5%, 10% or 20% to ensure choice and competition in the market for land.
- 5.5.6 The proposals entirely accord with this national policy objective in so far as the application will deliver new housing development which will assist the Council to contribute towards the central government objective of boosting significantly the supply of housing now.

5.6 Achieving Well-Designed Places

- 5.6.1 The DAS demonstrates how the scheme will deliver a high-quality residential sustainable development. The proposals are based on sound design principles that have considered site constraints and opportunities presented by the site.
- 5.6.2 Whilst design is a matter reserved for future determination, the DAS demonstrates that the site could accommodate a scheme that would be in scale and character with its surroundings and Arun through the creation of a development at a suitable scale and which draws on the local vernacular. It is demonstrated through the DAS and TA that the site would be accessible to people on foot, cycle and to those with disabilities. The illustrative master plan seeks to create an attractive place that responds to the attributes of the site and the local context.

5.6.3 The development has been designed considering the recommendations of the Landscape and Visual Impact Appraisal (LVIA). The green infrastructure within the built development will sit as an integral part of the framework and is key in creating an accessible, open and engaging place within which to live. The proposals for the site include 4.07ha of green infrastructure. The green infrastructure will have a range of functions and provide a range of benefits, including:

- Landscape: new native hedgerow, tree planting and structural planning along the site's boundaries to respect its setting, filter any views from the surrounding area, and enhance the existing boundary vegetation as well as strengthening habitats and the site's ecologically valuable assets. To mitigate against the loss of the existing boundary planting along the southern boundary, a new woodland belt is also proposed to follow the line of the sports pitches to the south of the development;
- Formal sports pitches: provision of land to accommodate two new full size adult football pitches, which will form a focal point to the development and promote healthy and active lifestyles for new and existing residents. The opportunity for the integration of the future aspirations of the sports hub will also be provided, which could be facilitated through this development;
- Open space/amenity areas: a network of public open spaces designed to create a sense of place, comprising a new children's play area, new public open space allowing for informal recreation, and recreational routes connecting the development to the surrounding open space and residential areas of Angmering; and,
- Sustainable urban drainage (SuDs): accommodation of a new attenuation basin in the north western corner of the site, to manage surface water run-off and provide an area of new wetland habitat on the site.

5.7 Conserving and Enhancing the Natural Environment

- 5.7.1 The site itself is not covered by any statutory or non-statutory designations for landscape character or quality, and there are no notable landscape features within the site. As confirmed by the LVIA prepared for the application, the site does not comprise a valued landscape and the proposed development would therefore make efficient use of the land while respecting the surrounding environment and landscape character. The SDNP lies to the north of the site and the A27, although the relevant technical reports that accompany this planning application demonstrate that the proposals will not have an adverse impact on the SDNP.
- 5.7.2 Development will result in a permanent change to the character of the application site; however, the proposals will aim to protect and retain notable existing landscape features where evident such as boundary hedgerows, mature hedgerow trees and the area of mixed broadleaf woodland to north of the site. It is considered, therefore, that the proposed development can be successfully assimilated into the local landscape without any unacceptable landscape or visual harm.
- 5.7.3 From an ecological perspective, biodiversity enhancements will be achieved through, for example, the creation of green corridors through the site for wildlife movement and dispersal, the creation of a wetland habitat within the SuDs basin, sowing of rich native grassland areas to be managed as meadow habitat, native tree and hedgerow planting, and installation of bat and bird boxes. This will result in an overall net gain in biodiversity as a result of the development.
- 5.7.4 The Arboricultural Assessment submitted alongside this application identifies no overriding arboricultural constraints to development on the site. Provision of green and open space on the site would provide scope for new tree planting, thus creating an opportunity to increase the arboriculture value of the site; as well as increasing the overall tree cover in the local area and enhancing local visual amenity. The assessment concludes that the proposed development of this site should be considered acceptable from an arboricultural perspective, due to the retention and protection of

existing high-quality trees and deciduous woodland adjacent the site's boundaries, and additional new tree planting which will increase tree cover.

- 5.7.5 Whilst the application proposal anticipates the release of agricultural land, this is an inevitable consequence of meeting development requirements around Angmering (and in Arun more generally) and is not considered to be significant in the context of the Framework.

5.8 Meeting the Challenge of Climate Change

- 5.8.1 Paragraph 148 of the Framework requires the planning system to "help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions..." The application proposal meets these criteria as it will be delivered to the relevant Building Regulations or equivalent standard applicable at the time of permission.

5.9 Conserving and Enhancing the Historic environment

- 5.9.1 Section 16 of the Framework provides policy guidance on the conservation and investigation of heritage assets. The Heritage Desk-Based Assessment that accompanies the application concludes that from an archaeological perspective, although recorded remains within and in the vicinity of the site suggest archaeological potential, there is currently no evidence to suggest remains of a significance that would preclude development in the present area. Furthermore, it is concluded that the site does not contain any designated heritage assets nor is anticipated that the proposed development would harm the setting or significance of any designated heritage assets within the wider environs of the site.

5.10 Summary

- 5.10.1 From the above, it is clear that the application proposal complies with relevant provisions and broad planning objectives of the Framework.
- 5.10.2 The assessment against the relevant policies does not indicate any circumstances under which permission should be restricted. The 'tilted balance' is engaged in this

case and planning permission should be granted unless any adverse impacts that arise from the proposal significantly and demonstrably outweigh the benefits.

6 Planning Balance and Conclusions

6.1 Introduction

- 6.1.1 The application proposals for the site respond positively to feedback on the earlier planning application and constructive dialogue with Angmering Parish Council and Arun District Council.
- 6.1.2 Consistent with national planning policy, and adopted and emerging local planning policies, the proposals will provide for a high-quality, sustainable development that fully respects its surroundings and offers high-quality residential accommodation and commercial space, and one that fully respects the site's setting and environmental value. The proposals make efficient use of the land, balancing built development with undeveloped open space, and preserve the character and context of the location without harming the setting of Angmering or its wider environs.
- 6.1.3 Accordingly, the proposals maximise opportunities for growth at the site (as required by the NPPF). The application proposals have been carefully designed to ensure that the development contributes to sustainable development, having regard to the adopted/emerging planning policy position, and are considered to be entirely appropriate in design, heritage, highways, and landscape and visual terms. Indeed, supporting material assessments and technical reports demonstrate that there are no constraints that would preclude the development of the application site; subject to planning conditions and/or obligations.
- 6.1.4 As with the release of any land, the development of the greenfield element of the application site will introduce changes to the area and have urbanising effects. Due care and attention have been given to ensuring that the perceived impact on Angmering is minimised and acceptable, through careful design and siting, and the provision of extensive open space and green infrastructure. There are opportunities to deliver significant environmental improvements to elements of the site, including the removal of a caravan storage area and poor quality commercial buildings and

their replacement with high quality new development. In any event, the site is well contained and has capacity to accommodate changes acceptably.

- 6.1.5 The development of the site, as proposed would be both suitable and sustainable, and there is justification to grant planning permission in accordance with the presumption in favour of sustainable development. Gladman is willing to enter into constructive dialogue with the Council to agree a list of conditions and Section 106 Heads of Terms that are necessary to make the development acceptable in planning terms. In order to commence this process, a list of suggested Heads of Terms for a Section 106 Agreement is enclosed at Appendix 1.

6.2 Benefits

- 6.2.1 As suggested throughout this Planning Statement, there are many benefits associated with the application proposals. These are summarised below under the headings of the main benefit areas.

Market and Affordable Housing

- 6.2.2 The delivery of up to 160 new, high-quality homes would make a positive contribution to the provision of housing at Angmering and in Arun District. Such a contribution would be particularly timely now, when the Council is unable to demonstrate a five-years supply of deliverable housing sites.
- 6.2.3 The proposals would also deliver a policy-compliant 30% affordable housing, equivalent to up to 48 affordable homes. By providing for affordable homes as part of the development, the proposals would secure socio-economic benefits through aiding in meeting the existing unmet affordable housing needs in the District.
- 6.2.4 Although located outside the adopted built-up area boundary for Angmering (identified on the ALP Policy Map), the delivery of housing on the application site is in conformity with the broad spatial strategy of the Development Plan. The Arun Local Plan (2018) makes clear the need to deliver at least 1,250 new dwellings on unallocated non-strategic sites. Of this minimum figure, it is expected that at least 117 dwellings will be delivered at Angmering. The application constitutes such a

sustainable site and will benefit the ADC and APC in meeting their emerging policy and housing aspirations.

Economic and Employment Opportunities

- 6.2.5 The eastern part of the site includes a parcel of land that is currently in employment use. This parcel of land comprises various utilitarian structures which house and support several businesses. Existing operations, including a caravan storage areas support low levels of employment and economic activity, with scope for advancement and improvement. The application proposals make provision for an employment/commercial centre in the south eastern area of the site, providing up to 6,000 sq ft of B1 / B2 floorspace (which could accommodate six modern, high-quality commercial starter units) and associated infrastructure. Notwithstanding a quantitative loss in employment land, qualitative improvements would be generated by the scheme. The provision of new starter units would benefit the continued modernisation and growth of Arun District's economy through providing buildings and infrastructure that better serve the needs of contemporary business, as well as boosting employment opportunities locally (and more widely).
- 6.2.6 Socio-economic benefits would also be secured by the proposed housing element of development. The cost of constructing 160 homes would be in the region of £20.8 million, a level of expenditure that would support approximately 173 full time employment (FTE) jobs and 189 FTE indirect jobs in associated built environment industries. Besides this, new housing can make an important contribution to the vitality and viability of settlements. New residents of the development would also be expected to generate additional expenditure and spending power that would support, reinforce and even promote the creation of new amenities and businesses for the benefit of the local populace and economy. Residents of the proposed development could be expected to generate total gross expenditure of £5.8 million. It is anticipated that a significant amount of weekly resident spending would be retained locally within Angmering and the surrounding area, although it is natural

that a proportion of resident spending would leak out to and support the wider District economy.

- 6.2.7 The gifting of land through the development package to help facilitate the new sports hub facility in Angmering will also make an important contribution to securing the new job creation and economic benefits that will arise from the delivery of this facility.

Sports Pitches and Facilities

- 6.2.8 The proposals make provision for land to accommodate two new full size football pitches. This land will be gifted to help the Council deliver a new sports hub. The sports hub would be multipurpose and significantly expand the range of sporting facilities available in Angmering (and also be of district wide importance).
- 6.2.9 The delivery of proposals that would facilitate the aspirations of a new sports hub and expanded playing pitch provision at the Palmer Road Recreation Ground are supported by Angmering Parish Council. It is also in compliance with the emerging Arun Public Open Space Standards SPD, which suggests a need for new open space, playing pitches and sports hubs.
- 6.2.10 The sort of expanded and remodelled sports hub facility anticipated by the Council's emerging sporting strategy (and the social and economic benefits that will flow from this) will not be realised without the additional land released through the proposed development package.

Public Open Space and Recreational Benefits

- 6.2.11 The proposals will provide new areas of public open space, including new recreational routes and a new locally equipped area of play, which will not only be available for use by the residents of the proposed development; but will also be available for use by the wider community.

Biodiversity Enhancements

- 6.2.12 It is confirmed through the application submission that the proposed development has the opportunity to enhance the biodiversity value of the site, when compared with the existing situation.

Improved Pedestrian Connectivity

- 6.2.13 It is proposed that the new development will deliver a new formalised crossing point across Arundel Road, linking the existing and proposed residential area with the Primary School.

Re-use of Previously Developed Land and Environmental Improvements

- 6.2.14 The proposed development will result in the removal of an existing poor quality commercial area, including a caravan storage area, which projects a poor outward appearance and its replacement will well designed, high quality development. This will deliver localised environmental improvements and support the national and local planning objective to make use of previously developed land.

Additional Linked Benefits

- 6.2.15 The proposed development will have a discreet access serving the proposed commercial area from Arundel Road. This has been assessed as having capacity to support the new sports hub facility on Palmer Road. This provides the opportunity for a number of benefits in the future including the potential to close the existing vehicular access to the sports and recreation area from Palmers Road (addressing what is understood to be a local highways issue). There is also potential for any new parking area associated with the new Palmer Road sports hub to be used by parents dropping children of at St Margaret's C of E Primary School (utilising the existing pedestrian access and the proposed new controlled crossing point at Arundel Road to provide safe access to the school), reducing on-street parking during school drop off and pick up times. This could help improve traffic movement within the Angmering and especially around the vicinity of the primary school.

6.3 Harms

- 6.3.1 The supporting material, assessments and reports demonstrate that there are no unacceptable adverse impacts associated with the scheme.
- 6.3.2 As with any site, the development will introduce changes to the area and some urbanising effects and it will involve the loss of some agricultural land; however, this is to be expected and the LVIA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts.

6.4 Planning Balance and Conclusions

- 6.4.1 The Framework policies on the delivery of sustainable housing development carry significant weight, and the delivery of the proposed development would support housing and economic development objectives and meet the aims and objectives of sustainable development, securing net gains across all three strands of sustainable development (economic, social and environmental).
- 6.4.2 There are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal and specific policies of the Framework and Development Plan do not indicate that development should be restricted.
- 6.4.3 The identified harms of the proposed development include the further domestication of an area of land comprising agricultural fields and existent built development. Given the limited nature and extent of these harms, it is considered that they do not equate to significantly and demonstrably outweighing the benefits and no policies in the Framework provide a clear reason for refusing the planning application. Rather, the benefits (which are significant) overwhelmingly weigh in favour of the proposed development.
- 6.4.4 Having regard to the development plan and other material considerations, it is clear that planning permission should be granted for the proposed development.

APPENDIX 1: SECTION 106 DRAFT HEADS OF TERMS

The following S.106 Heads of Terms are proposed as those obligations which, in accordance with relevant CIL Regulations are necessary, directly related to the development and fairly in scale and kind to the development.

AFFORDABLE HOUSING

- i. The Agreement will provide for 30% affordable housing with a tenure split to be agreed with the Local Authority.

OPEN SPACE

- i. The Agreement will require the Developer to provide onsite informal open space and an equipped children's play area.
- ii. Appropriate phasing requirements will be specified together with the requirement to agree with the Council an appropriate scheme for the long term maintenance and management of these areas, including any off-site commuted sums as applicable.

HIGHWAYS AND PUBLIC TRANSPORT

- i. The Agreement will require the Developer to provide, as necessary, the improvements identified to improve the public highway, sustainable and public transport provision within the vicinity of the site.

OTHER

- i. Other contributions may be identified through the planning consultation process, and subject to meeting the appropriate tests of necessity and reasonableness, consideration will be given to their inclusion.
- ii. An obligation to transfer an identified area of land in relation to the sports pitch provision to enable the remodelling and provision of a sports hub.



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