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PLANNING STATEMENT

LAND WEST OF BROOK LANE AND SOUTH
OF THE A259

STORE PROPERTY INVESTMENTS LIMITED

Date: March 2017

Ref: 12491

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APPENDICES

**APPENDIX 1: ARUN DISTRICT COUNCIL PRE-APPLICATION ADVICE (REF. PAA/43/16/)
DATED APRIL 2016**

APPENDIX 2: SUMMARY OF RELEVANT DEVELOPMENT PLAN POLICIES

Revision	Description	Originated	Checked	Reviewed	Authorised	Date
-	Final	NB	SP	SP	SP	01.03.2017
DWD Job Number: 12491						

1.0 INTRODUCTION

- 1.1 This Planning Statement ('Statement') has been prepared by Dalton Warner Davis LLP ('DWD') acting on behalf of Store Property Investments Ltd ('the applicant') in support of an application for outline planning permission on Land West of Brook Lane and South of A259 within the Parishes of Brookfield and Angmering and Findon ('the application site') for the following Proposed Development:

"Outline planning permission (with all matters reserved) for demolition of existing buildings on site and the erection of a mixed use development comprising residential units and care home (Use Class C2 and C3) and ancillary facilities including railway crossing together with associated access, car parking and landscaping"

- 1.2 The outline planning application seeks to establish the principle of the proposed uses, with all matters reserved for future determination including scale, access, appearance, landscaping and layout.
- 1.3 This Statement outlines the Proposed Development and explains how the development complies with the relevant national planning policy, the development plan and other material considerations with reference to supporting technical documents and drawings.
- 1.4 The applicant has undertaken pre-application consultation with Arun District Council ('the Council') in relation to this proposal which confirms the principle of development on the application site is acceptable.
- 1.5 The extent of submitted documentation and plans is in accordance with pre-application guidance received, albeit modified to reflect the outline nature of the submission. This Statement should be read in conjunction with a number of other reports and studies that have been prepared in support of the proposal, namely:
- Application Form and Certificates;
 - Covering Letter;
 - Application Drawings (Refer to on schedule of drawings in Covering Letter);
 - Planning Summary prepared by DWD;
 - Affordable Housing Statement prepared by DWD;
 - Design and Access Statement by Studio Lack Ltd;

-
- Transport Statement and Travel Plan by Mayer Brown;
 - Noise Assessment by ADC Acoustics;
 - Flood Risk Assessment by CTP;
 - Ecology Phase 1 Report by Ecology Partnership;
 - Biodiversity Checklist by Ecology Partnership;
 - Tree Survey and Arboricultural Report by ACD Environmental;
 - Geo Phase 1 Desk Study by Geo-Environmental;
 - Archaeological Desk-Based Assessment by PCA Heritage;
 - Indicative Land Engineering Statement ACD Environmental; and
 - Indicative Landscaping Strategy by ACD Environmental.

1.6 This Planning Statement is set out as follows:

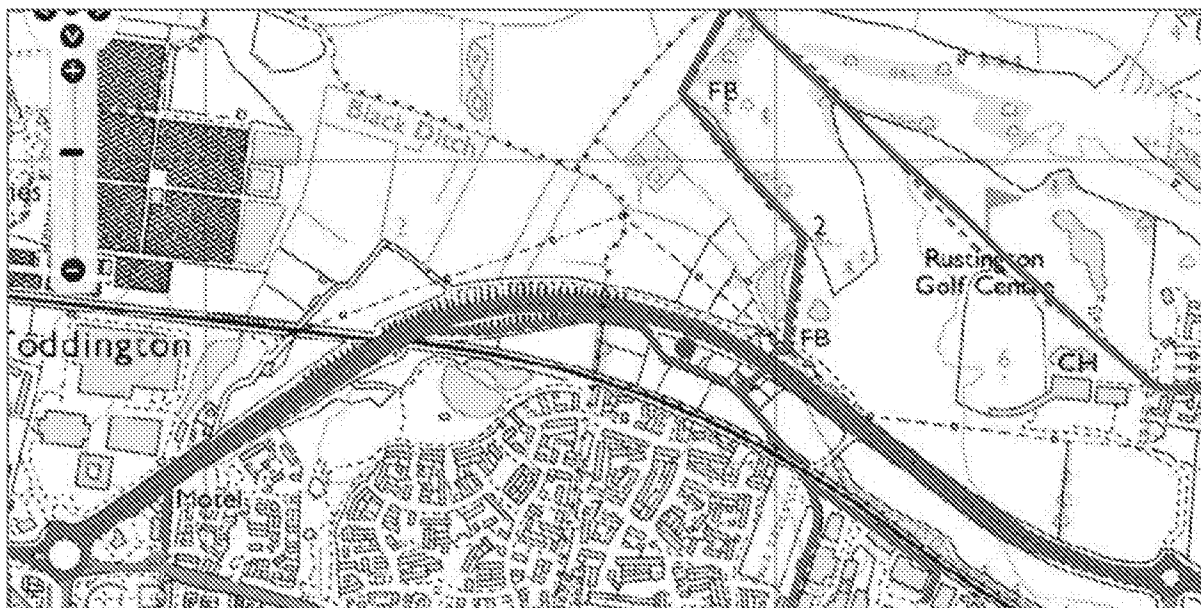
- Section 2.0 provides a description of the site and land use designations;
- Section 3.0 sets out the relevant pre-application advice and planning history pertaining to the site and surroundings;
- Section 4.0 describes the proposed development;
- Section 5.0 outlines the national and local planning policy context and material considerations;
- Section 6.0 analyses the proposed development in relation to the relevant development plan policies and material considerations identified in Section 5.0; and
- Section 6.0 concludes on the relevant planning considerations of the proposal.

2.0 SITE AND SURROUNDINGS

Application Site

- 2.1 The application site measures approximately 5.92 ha in size and is located to the south of the A259 and to the north of the railway line. The site is bounded to the east by Brook Lane and to west by the A259. The site is largely undeveloped and the local area has historically been used for grazing. The site is functionally related to Rustington, however, the site falls within the Parish Boundaries of Brookfield (to the west) and Angmering and Findon to the east.
- 2.2 The adjoining land to the east of the application site between Brook Lane and Mill Lane has been subject to a number of recent planning applications for retail use (food store and public house) and beyond this further east is a retail and car showroom development that has recently opened. A summary of relevant planning history is set out in Section 3.0 below.
- 2.3 The surrounding area is mixed in character with open fields and a golf course located to the north of the application site and the A259, existing residential development to the south and existing and emerging commercial developments to the west and east of the site respectively. The application site is sustainably located close to local shops, services and existing communications routes.
- 2.4 The topography of the site is generally flat, and is at a lower level than the A259 to the north of the site and lower than Mill Lane to the east. There are trees along the site boundaries of various species and a grass verge separates the site from the A259.
- 2.5 There is a public right of way ('ProW') providing pedestrian access across the railway line to the southern side of Penfold Lane. The ProW bisects the site north of the railway line, with one route heading towards the A259, and another ProW route which runs westwards joining to the northern site boundary towards Toddington. The map below is an extract from West Sussex County Council's Imap and highlights the ProW routes in red.

Figure 1.0 – West Sussex County Council IMAP – Public Rights of Way



Source: West Sussex County Council Imap

- 2.6 The majority of the application site is situated within Flood Zone 1 with a low annual probability of flooding. In the south eastern corner of the site there is a small area of land (approximately 0.6ha) located in Flood Zone 2 and a smaller parcel (approximately 0.2ha) within Flood Zone 3.

Site Designations

- 2.7 Subsequent sections of this report consider the planning policy for the site in detail. In summary the application site is not covered by any specific local planning designation or allocation within any current development plan documents.
- 2.8 The site is not located within an area of Archaeological Interest as defined on the adopted Proposals Map, or within a Conservation Area. The site it is not within the vicinity of any statutory or locally listed buildings.

3.0 PLANNING HISTORY AND PRE-APPLICATION ADVICE

Pre-Application Advice

3.1 A pre-application submission (ref. PAA/43/16/) was made in March 2016 and written advice letter was issued by the Council in April 2016 (see Appendix 1). The letter supports the principle of a residential development at this site and a summary of key extracts are set out below:

- *“The Council is currently unable to demonstrate a 5 year, National Planning Policy Framework compliant, supply of housing and with the current objectively assessed housing need for the District at 845 dwellings per year and completions below the required rates, it is clear that housing supply needs to be maintained. This means that the Council should not be refusing applications for development outside of the built up area boundary solely on the grounds of principle.” (p.3)*
- *“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision taking. This site will be sustainably located close to shops, services and existing communications routes and would be physically and visually connected to the existing built up area to the east. Permission has recently been granted for retail development on the adjoining site to the east under A/123/15/OUT and A/19/15/PL” (p.3)*
- *“It is considered that the application is acceptable in principle despite being located on a greenfield site outside of the built up area boundary. It will be assessed against normal development control criteria and regard will be had to the Neighbourhood Plan.” (p.4)*

3.2 The planning permissions referred to in the second bullet above (refs. A/123/15/OUT and A/19/15/PL) are discussed in detail in paras. 3.6 to 3.9 below.

3.3 It is noted that the pre-application advice suggests on p.4 that a commercial development on this site is unlikely to be acceptable.

Planning History – Application Site

3.4 The planning history pertaining to the application site is summarised in Table 1 below:

Table 1.0 – Application Site Planning History

APPLICATION REF.	ADDRESS	DETAILS	DECISION	DECISION DATE
A/100/16/DEM	The Old Stables, Brook Lane, Angmering, BN16 3JL	Notification for prior approval for demolition of single storey dwelling	No objection	05/07/16
A/116/10/CLE	The Old Stables, Brook Lane, Rustington BN16 3JL	Application for a Certificate of Lawfulness for an existing use as Class C3 residential.	Approved	20/08/10
A/37/04	The Old Stables, Brook Lane, Angmering	Renewal of temporary permission A/12/02 for use of land for the stationing of 1x mobile home	Approved Conditionally	11/03/04
A/32/02	Brookenbee, Brook Lane, Rustington	Greenhouse Extension	Approve Conditionally	23/05/02
A/12/02	The Old Stables, Brook Lane, Rustington	Renewal of temporary planning permission A/96/98 for use of land for the stationing of 1 no mobile home (Departure from the Development Plan)	Approved Cond + S106	14/02/02
A/96/98	The Old Stables, Brook Lane, Rustington	Use of land for the stationing of 1 no. mobile home.	Approve Conditionally	12/08/98
A/88/97	Brookenbee Cottage Brook Lane Rustington	Change of use of the land from residential to mixed use for residential purposes and use for the servicing and rebuilding of	Appealed	24/10/97

		classic cars		
A/132/96	Brookenbee Brook Lane Rustington	Greenhouse for domestic leisure purposes	Approve Conditionally	16/12/96
A/101/96	The Old Stables Penfold Lane, Rustington	Use of Land for stationing of residential mobile home	Approved Cond + S106	25/07/96
A/100/93	Stables to the South of the Rustington-By- Pass Penfold Lane Rustington	Clay pan tiled pitched roof to existing refurbished stables	Approve	20/12/93

Planning history – Surrounding Area

- 3.5 The relevant planning history relating to the surrounding area is set out below.

A/23/15/OUT – Hybrid Application

- 3.6 A hybrid planning application relating to land the east of the application site and east of Brook Lane for a mixed use development comprising A1 (full planning) and A4 space (outline planning) including access road, car parking, landscaping and other works was approved by the Council on 27th June 2016. However, this permission is subject to challenge and is likely to be quashed. Notwithstanding this, there is also another application that is pending for the site. Our assessments have continued to assess the site as a committed development in order to be robust. The application submitted in 2015 used the Brook Lane access from the A259 and included various enhancement to the access road including a roundabout.

A/125/13 – Hybrid Application – Approved

- 3.7 A hybrid application relating to land west of Mill Lane in between the A259 and the railway and approximately 0.4km east of the application site, was approved on 13th June 2014. This development comprises of up to 3,365sqm A1 retail use (including parking) and full planning for 3,947sqm and Sui Generis vehicular floorspace (including ancillary facilities, landscaping and parking) including workshops, MOT facility, car valeting, car storage and new access from A259.
- 3.8 The officers report for this application (A/125/13) states that it recognised that the development site is located outside of the ‘Built Up Boundary’ (GEN2) and was also contrary to Policy GEN3 (Protecting the Countryside) of the extant 2003 Local Plan, however, it is also acknowledged that *“the weight ascribed to these policies needs to be assessed in accordance with the NPPF”* and that the way in which *“these policies are expressed through boundaries has become out-of-date as they do not take into account the development needs arising in the District after 2011”*

A/19/15/PL – Variation of Condition Application under A/125/13 – Approved

- 3.9 An application for the variation of conditions 3, 5, 6, 8 & 21 imposed under A/125/13 for approved plans, external floor space of retail stores, non-food retail warehousing, internal area of non-food bulky goods retail units & materials & finishes was approved on 6 May 2015.

Other Applications

- 3.10 DWD has also undertaken a review of recent substantial residential permissions in the Arun District. From these the most relevant application is detailed below, which comprises a similar piece of land located between the A259 and Railway line.
- 3.11 Application FG/108/11 or the 'Ferring Site', is situated adjacent to the southern boundary of A259 approximately 3.5 kilometres east of the Land to the West of Brook Lane, an appeal was overturned in March 2013 to grant outline planning permission for up to 40 dwellings (30% affordable – up to 12 dwellings), 2,304 square metres of open space, incidental landscaping and vehicular access on to the A259.
- 3.12 The application was originally refused based on the development's location within the Strategic Gap and the character and appearance of the surrounding area. However given the residential backdrop, its proximity to an Asda Superstore and the position of the A259, it was considered there could only be a very limited conflict with Policy GEN7: *"to protect and enhance the quality of the environment"*.
- 3.13 The appeal decision states that although the site is situated outside of the Built Up Area Boundary (GEN2) and was also contrary to Policy GEN3 (Protecting the Countryside) both these policies were *"both drawn principally to restrict new housing and protect the countryside on the basis of meeting housing targets for the plan period."* GEN2 and GEN3 now have reduced weight as they are 'time expired' and do not relate to housing provision beyond 2011. It should also be noted that the appeal decision refers to officers expressing *"similar views in relation to development proposals at Courtwick and Toddington"*.

4.0 PROPOSED DEVELOPMENT

4.1 The planning application seeks:

“Outline planning permission (with all matters reserved) for demolition of existing buildings on site and the erection of a mixed use development comprising residential units and care home (Use Class C2 and C3) and ancillary facilities including railway crossing together with associated access, car parking and landscaping”

4.2 Outline planning permission is sought in respect of the principle of the proposed mixed use residential and care home development and all matters (scale, access, appearance, landscaping and layout) reserved for future determination.

4.3 The total application site area is 5.92 hectares (ha). We provide details of both components of the proposed mix use development below:

Residential

4.4 Outline planning permission is sought for a residential development. The indicative scheme is for 90 dwellings and the indicative proposed mix is set out in the table below:

Table 2.0 –Summary of Indicative Scheme

DWELLING TYPE	NO. OF UNITS
1-bed flat	10
2-bed flat	14
2-bed house	30
3-bed house	35
4-bed house	1
Total	90

4.5 The proposed development will provide 30% affordable housing on-site. For the indicative scheme of 90 dwellings this equates to 27 affordable dwellings. The tenure, dwelling type/size and location of on-site affordable housing will be for subsequent approval under a reserved matters application.

4.6 Scale, design and appearance are matters reserved for future consideration, however as illustrated in the indicative proposals, the proposed residential development would be likely to be predominantly two storeys in height and would not exceed a maximum parameter of three storeys in height. The development would comprise a wide range of housing types including small apartment blocks, terraced, semi-detached and detached housing.

- 4.7 The application site is sustainably located close to shops, services and existing communications routes and the proposed development would make a significant contribution to meeting the housing need in the District, as demonstrated later in this Statement.

Care Home

- 4.8 Outline planning permission is sought for a residential care home. The indicative scheme comprises a 72 bed residential dementia care home.
- 4.9 Scale, design and appearance are matters reserved for future consideration, however, as illustrated in the indicative proposals and detailed in the Design and Access Statement, the care home would be up to three storeys in height, with a flat roof.
- 4.10 The proposed care home would meet growing local and national demand as demonstrated later in this Statement. The indicative scheme has been designed with the operational requirements of St Matthews Healthcare. St. Matthews prides itself in caring for individuals employing a holistic approach to healthcare, enabling residents to strive for independence and where appropriate, return to the community.
- 4.11 St Matthews provides the highest standards of accommodation and excellent quality of care delivered by a dedicated team of experts. Service users are able to access the wide range of services provided in the different settings and make appropriate lifestyle choices. The team are committed to rehabilitating service users by improving their capacity for self management, sense of social engagement and belonging in a way that will help them make healthier lifestyle choices. St Matthews aims to:
- Provide a safe and secure environment for people with challenging mental health problems with complex needs.
 - Recognise clients as individuals, and treat them with dignity and respect, providing a person-centered approach to each individual.
 - Promote independence to service users in meeting their agreed care plans.
 - Support and assist service users in learning or re-learning skills to live independently where possible.
- 4.12 The proposed care home has been designed to provide:
- Dementia and high dependency nursing needs.

- High dementia / Early Onset Dementia
- High dependency physical nursing care
- Huntington Disease
- Dual diagnosis with Neurological Illness
- Challenging mental health needs.
- Enduring mental illness
- Day centre facility to provide therapeutic individual programmes, leisure and occupational therapy for all service users.

4.13 In addition to these benefits, the care home would be likely to result in the creation of approximately 78 FTE jobs.

Access and Car Parking Provision

4.14 Access is a matter reserved for future consideration, nonetheless, the indicative proposals show the proposed access to the site from the A259 to be sited broadly in the same location as the existing Brook Lane access. The indicative vehicular access comprises a left in / left out access from the A259 and includes a new roundabout which will provide access to the proposed residential development to the west and could also serve the proposed retail developments to the east. Vehicles will be able to pass between the proposed retail developments to the east if permission is granted, without having to re-join the A259 in between sites.

4.15 The proposed parking would all be at ground level and accessed via the access of the A259. The indicative proposals show 193 car parking spaces for the residential development of which a proportion will be dedicated for disabled use. 29 spaces are proposed to serve the care home which is broken down into 4 spaces for residents, 10 spaces for visitors and 15 spaces for staff. This drawing also indicates potential bin storage and cycle parking locations. As the application is submitted in outline the amount and location of parking is to be submitted for approval at a later stage.

Footpaths, Cycle Ways and a New Railway Bridge Crossing

4.16 As shown in the indicative proposals and detailed in the Transport Assessment, it is proposed to construct a new pedestrian and cycle bridge over the railway to replace the existing crossing

(public right of way) in the south east corner of the application site to significantly improve the safety of this crossing for pedestrians and cyclists which is currently considered to be dangerous by Network Rail.

- 4.17 The position of the footpaths and cycle ways have been an important consideration from the conception of the design at this site. The indicative proposals show that all existing public footpaths will be retained and a new network of footpaths and cycle ways are proposed in order to provide access internally within the site and also to improve links to the surrounding area, including to the countryside to the north of the site, to the proposed retail developments to the east, to the existing shops and facilities in Rustington to the south, and to Brookfield Park and playground to the west.

Landscaping

- 4.18 Landscaping is a matter reserved for future consideration, nonetheless, the indicative proposals have sought to demonstrate how existing and proposed planting at the site could be incorporated with the indicative proposed layout. The objective for the development is to retain and enhance where possible the existing hedges and trees to give the development an established feel from as early as possible. New native trees and hedges will be planted to define areas within the housing layout to create a pleasant leafy environment. A new area of public open space is proposed within the west of the site.
- 4.19 The indicative proposals also indicate a new balancing pond in the south east corner of the site to potentially form part of the overall drainage strategy for the site.

5.0 THE DEVELOPMENT PLAN AND OTHER MATERIAL CONSIDERATIONS

5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that *“regard is to be given to the development plan for the purpose of any determination to be made under the planning acts the determination must be in accordance with the plan unless material considerations indicate otherwise.”*

5.2 Currently, the relevant part of the development plan for the application site comprises:

- the saved policies of the Arun District Local Plan (adopted in 2003)
- Littlehampton Neighbourhood Development Plan (2014)
- Angmering Neighbourhood Plan (2015)

5.3 The Arun District Local Plan was intended to cover the period 2003-2011 and therefore its housing supply policies are significantly out of date. The examination of the Draft Arun District Local Plan (2011-2031) was formally suspended due to problems with the housing requirement for the plan period and this is explained in further detail in paras. 5.11 to 5.16.

5.4 In the event of conflict between policies in the adopted plan with Government policy, it is the most recent policy which takes precedence. With this in mind the National Planning Policy Framework (NPPF) which was issued in March 2012 is materially relevant, as explained in paras. 5.17 to 5.29 below.

5.5 Neighbourhood planning is also a key consideration for the application. Arun District Council has adopted several Neighbourhood Plans since the Localism Act (2011). Since the adoption of the aforementioned Neighbourhood Plans, the Council has redrawn the boundaries of wards, including the Brookfield Ward. The western end of the site is located within the Brookfield Ward and is therefore partially inside the designated area of the Littlehampton Neighbourhood Development Plan.

5.6 The remainder of the site is located within the designated area for the Angmering Neighbourhood Plan. There are no site specific allocations within either plan, however general design policies apply to the site and have been considered as part of this application. Although the site falls within the Neighbourhood Plan boundaries referred to above, it is reiterated that the site is functionally related to Rustington, and therefore it is important that the design of the proposal responds to the context in which it is situated.

5.7 A full list of relevant adopted and emerging development plan policies is in Appendix 2.

Local Planning Policy

Adopted District Local Plan (2003)

5.8 The following saved policies could be considered to be relevant to the determination of this application:

- GEN2: Built-up Area Boundary;
- GEN3: Protection of the Countryside;
- GEN7: The Form of New Development;
- GEN8: Development and the Provision of Infrastructure;
- GEN9: Foul and Surface Water Drainage;
- GEN12: Parking in New Development;
- GEN14: Public Transport;
- GEN15: Cycling and Walking;
- GEN18: Crime Prevention;
- GEN20: Provision of Public Open Space Within New Development;
- GEN25: Water Resources;
- GEN32: Noise Pollution;
- GEN33: Light Pollution;
- GEN34: Air Pollution; and
- DEV17: Affordable Housing

5.9 The weight applied to the policies above needs to be assessed in accordance with the NPPF. Those in the Local Plan that have been saved retain the full standing of development plan policies. However, the Framework states that policies not adopted since 2004 should be given due weight according to their degree of consistency with the Framework.

5.10 It is considered that the way policies GEN2 and GEN3 are expressed through boundaries on the ground has become out-of-date, as they need to take account of the development needs arising in the District after 2011, and as such will be revised in the emerging planning policy. Therefore policies within the NPPF would attract greater weight than both of these policies.

Emerging Arun Local Plan

- 5.11 The Arun Local Plan (2011-2031) Publication Version (October, 2014), was submitted to the Secretary of State for independent Examination in Public (EiP) in January 2015. This set out a requirement for 580 dwellings per annum (dpa). The 2012 Strategic Housing Land Availability Assessment (SHLAA) update report supported the preparation of the draft Local Plan and identification of potential strategic sites as well as the preparation of the Council's Housing Implementation Strategy and Five Year Housing Land Supply 2014-2019 report.
- 5.12 EiP hearings followed submission in June 2015. At this time, the Inspector was made aware of further evidence emerging which increased the housing requirement figure (OAN) to 758 dpa. The Inspector held a Procedural Meeting in order to determine how the Arun Local Plan EiP should proceed. It was concluded that the OAN evidence should first be consulted on, with a hearing to follow in early 2016.
- 5.13 The OAN hearing took place on 14th January 2016 at Arun District Council. On the 2nd February 2016, the Inspector issued a letter which formally suspended the ALP EiP for a period of fifteen months in order to enable the Council to carry out the programme of work required to review the most appropriate spatial strategy to meet the updated OAN. The letter confirms that the OAN figure for Arun District Council should be 845 dwellings per annum. The Council's programme of works for the EiP of the Local Plan is outlined in the revised Local Development Scheme (LDS) that is to be presented to the Local Plan Sub-Committee on 9 March 2017. The revised LDS earmarks the resumption of Examination in Summer 2017 following a consultation on Main Modifications to the Arun Local Plan. The adoption of the Plan is predicted to be Winter 2017.
- 5.14 As explained in the latest Housing and Economic Land Availability Assessment (HELAA) published in November 2016 (which supersedes the SHLAA), further work has been undertaken by the Council to consider the implications for the OAN arising from the 2014-based Sub-National Population Projections, issued by the Office of National Statistics (ONS) in May 2016, and associated Household Projections. The report identifies an OAN for 919 dwellings per annum. The HELAA and other draft Local Plan Evidence base documents are set out in sections 5.34 to 5.44.
- 5.15 In addition to this, the Council cannot meet the NPPF requirement for a 5-year supply of deliverable site plus an additional 20% buffer (resulting from the previous consistent under-supply of housing land) as set out in para. 5.20 below.
- 5.16 In light of the above, the 2003 Local Plan remains extant, including its housing supply policies which are substantially out of date. As the council cannot demonstrate a 5 year housing land

supply, limited weight can be attached to Policy GEN2 (built up boundary) and GEN3 (protection of countryside), as they restrict sustainable housing development. It is considered that if the proposal conflicts with these policies then this is not a sufficient reason to refuse the application and this is confirmed in the Council's pre-application advice issued on 29th April 2016,. The acceptability of the principle of development is discussed in further detail in Section 7.0 below.

National Planning Policy Framework (NPPF)

5.17 The National Planning Policy Framework (NPPF) published in March 2012 sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6). The NPPF states that there are three dimensions to sustainable development, namely the economic, social and environmental roles, which are mutually dependant.

5.18 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 14 of the NPPF states that in decision making, the presumption in favour of sustainable development means:

*"Approving development proposals that accord with the development plan without delay; and
Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- specific policies in this Framework indicate development should be restricted"*

5.19 Paragraph 17 lists 12 'Core planning principles' that should underpin both plan making and decision taking. The third principle confirms that *"Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area"* and that development plans should *"set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities."*

5.20 Paragraph 47 aims; *"To boost significantly the supply of housing"* and planning authorities are required to *"use their evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as it is consistent with the policies set out in this Framework..."*. Authorities are required to identify 5

years of deliverable housing sites with an additional buffer of 5% or 20% where a persistent under-delivery of housing has taken place.

- 5.21 Paragraph 49 confirms that *"Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites."*
- 5.22 Paragraph 182 confirms that in order for a development plan to be considered 'sound' (entitling its policies to full consideration during decision making), it must be 'positively prepared' (to meet objectively assessed development and infrastructure requirements), 'justified' (to provide the most appropriate strategy based upon reasonable alternatives), 'effective' (to deliver development over the plan period) and 'consistent with national policy' in order to *"enable the delivery of sustainable development in accordance with the policies in the Framework."*
- 5.23 Paragraph 215 notes that *"due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to policies in the Framework, the greater the weight that may be given)."*

Promoting Healthy Communities

- 5.24 One of the Core planning principles in Paragraph 17 states that planning should *"take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs"*.
- 5.25 Section 8 of the Framework requires the promotion of healthy communities, that foster integration, are safe and accessible environments where crime and disorder and the fear of crime and disorder do not undermine quality of life or cohesion. The Framework requires the delivery of safe and accessible environments which contain clear and legible pedestrian routes and high quality public space.
- 5.26 Paragraph 70 states that in order to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision of (inter alia) local services to *"enhance the sustainability of communities and residential environments"*.

Highways, Transport and Parking

- 5.27 Paragraph 32 of the NPPF states that *“development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”*. The NPPF requires a Transport Assessment to support proposals for developments which would generate significant amounts of movement.
- 5.28 One of the 12 core planning principles of the NPPF is to ensure *“actively managed patterns of growth to make the fullest possible use of public transport, walking, and cycling, and focus significant development in locations which are or can be made sustainable”* (Paragraph 17).
- 5.29 Additionally Section 4 of the NPPF relates to “promoting sustainable development” and states that *“the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel”* (Paragraph 29).

Angmering Neighbourhood Plan (2015)

- 5.30 The policies relevant to the consideration of this outline application are as follows:

- HD3 - Housing Mix
- HD5 – Built Form
- HD7 – Housing Density
- HD8 – Parking for New Developments
- TM1 – Local Highways
- TM2 – Cycling Walking & Equestrian
- EH3 – Flood Prevention

Littlehampton Neighbourhood Development Plan (2014)

- 5.31 The only policy considered relevant to this outline application is Policy 22 – Design of New Development. It is important to re-iterate that only a very small portion of the site falls within the Littlehampton Neighbourhood Development Plan, and that the indicative design shows very little built development on this part of the site.

Rustington Neighbourhood Development Plan (2015)

- 5.32 As identified above the site does not form part of the area covered by the Rustington Neighbourhood Development Plan (RNDP). Therefore the RNDP does not form part of the development plan for the purposes of determining the application. Nonetheless we have sought to review the content of the plan given the functional relationship of the site to Rustington. The indicative proposals have been developed in accordance with Policy 2: Housing Design of Rustington Neighbourhood Plan (2015). The proposals have been designed to reflect the character of the residential neighbourhood to the south of the application site. While shown indicatively in this application, the residential element of the proposals matches the neighbourhood in terms of scale, density, massing and height. In addition, while reserved for future consideration, the indicative landscaping proposals include significant areas of new native trees and hedges to provide a development that reflects the character of the area.
- 5.33 In addition, Section 4.10 of the Rustington Neighbourhood Plan requires that the design of all housing schemes reflects the local character of different parts of the parish by responding positively to the Rustington Village Design Statement (2010). The scheme is compliant with the Statement as the residential area to the south of the site is located within Character Area 10 of the Design Statement which is characterised by late 1990's/2000 estate development with a mixture of semi-detached and detached homes as well as three storey buildings on Hamilton Close which adjoins the application site boundary. It is considered that the design of the scheme is compliant with the Design Statement.

Draft Local Plan Evidence Base DocumentsHousing and Economic Land Availability Assessment (HELAA) (November 2016)

- 5.34 The Arun District Council HELAA forms a strategic assessment of land available for development which is required by the NPPF (paragraph 159). The HELAA (November 2016) combines information from the 2012 Strategic Housing Land Availability Assessment (SHLAA) and the 2010 Employment and Economic Land Assessment (EELA).
- 5.35 The application site is identified in the HELAA (p.171) as site ref. R10a and "*Land South of Rustington Bypass (Western end)*" within Rustington settlement in the parish of Angmering. The site is identified as being suitable for housing and commercial development and has a suggested density of 35 dwellings per hectare and a total yield of 121 new dwellings which could potentially be delivered over a period of 3 years.

5.36 This report was taken to the Local Plan Sub-Committee on 6th December 2016. As confirmed in the meeting minutes, the committee resolved that the current 5 year housing land supply position shows a policy off position of 2.12 years supply (an undersupply of 2.88 years) and that the Council would commence as soon as possible a process to inform future allocation in either updated Neighbourhood Plans or a Development Plan Document post adoption of the Arun Local Plan. It is noted that subsequently Arun District Council has confirmed that the current HLS is 1.92 years (as of January 2017).

5.37 There was a recommendation to full Council that in order to secure a sound Plan at the time the Local Plan examination resumes and in order to boost the short term housing supply, the housing approach set out in the report which would invite planning applications in the following circumstances (inter alia): on sites identified as being 'deliverable' by the HELAA where they are considered sustainable and will not prejudice the emerging local plan and / or infrastructure delivery.

OAN Report for Housing in the Arun District (2015) and Updated Housing Needs Evidence (September 2016)

5.38 The 'Objectively Assessed Housing Need Report' (2015), produced by GL Hearn, considers housing need within Arun District. The 'Updated Housing Needs Evidence' report (2016) is the latest assessment of housing need and is an addendum to the 2015 report.

5.39 As explained in paras. 5.11 to 5.16 above, the Inspectors confirmed in a letter dated February 2016 that the OAN for housing in Arun was for 845 dwellings per annum, equating to 16,900 dwellings over the 2011-31 plan period. This was based on 2012-based population and household projections, together with an adjustment to support stronger household formation amongst those aged 25-34.

5.40 The purpose of the update report is to consider whether the implications for the OAN arising from the 2014-based Sub-National Population Projections issued by ONS in May 2016 and associated Household Projections, published by CLG in July 2016.

5.41 The report states in para 1.4 that 2014-based population and household projections show stronger population growth with the District's population expected to grow by 30,600 persons (20.4%) over the 2011-31 period resulting in an increase in the assessed housing need to 18,380 homes (919 dwellings per annum) over the plan period. The report thus identifies an OAN for 919 dpa and advises that the housing provision within the plan should take account of these latest official projections.

5.42 The report also considers the need for different types of homes and identifies the following strategic mix of homes as an appropriate starting point for monitoring housing provision:

Table 1: Suggested broad mix of housing by size and tenure – Arun

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	5-10%	40-45%	35-40%	10-15%
Intermediate/Starter Homes	15-20%	50-55%	25-30%	0-5%
Affordable Rented	35-40%	35-40%	15-20%	5-10%

Source: Updated Housing Needs Evidence (September 2016) report, para. 1.6, p.7

5.43 The report assessed the need for Starter Homes in para 1.7 and concludes that there is a need for 136 Starter Homes per annum over 2015-20 period which is equivalent to around 11% of the total need. The evidence would justify a requirement for Starter homes of up to 10% of provision.

5.44 Para 1.8 states that the population of older persons is expected to grow significantly over the plan period, increasing by 55% (21,800 persons) and suggests there is a need for 113 homes per annum which equates to 12% of the overall housing need. Paragraph 1.9 identifies a need for 991 residential care/nursing home bedspaces (an average of 50 per annum) which, conversely, is separate and additional to the overall need for housing (18,380 dwellings).

6.0 PLANNING ISSUES

6.1 On the basis of the review of relevant planning policies, we consider the key planning issues to be considered are as follows:

- Principle of Development;
- Design and Visual Impact;
- Residential Amenity;
- Affordable Housing;
- Highways, Transport and Parking;
- Flood Risk and Drainage;
- Ecology;
- Trees; and
- Contamination and Archaeology.

6.2 The following sections of this report proceed to analyse the proposed development in respect of the planning issues identified above.

7.0 PRINCIPLE OF DEVELOPMENT

- 7.1 This section of the planning statement assesses the principle of the proposed development against the policies identified in above in Section 5.
- 7.2 The application site lies in a countryside location outside the built-up area boundary where the principle of the proposed development would normally be considered to be unacceptable due to adopted Arun District Local Plan (2003) policies GEN2 and GEN3 which seek to focus development within built up areas. However, as explained in sections 5.11 to 5.23 above, both these policies are inconsistent with the provisions of the NPPF and therefore should be discounted for the purposes of the consideration of this application. This is acknowledged within the Council's pre-application response and also in relation to other applications on other sites within the District that fall outside the development boundary including on land directly to the east of the application site (e.g. application refs. A/123/15/OUT and A/19/15/PL summarised in para. 3.6 above).
- 7.3 The NPPF states in paragraph 49: *"Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites"*. The Council is currently unable to demonstrate an adequate supply of housing land as required by paragraph 49 of the NPPF. As explained in paras 5.11 to 5.16 above, the suspension of the Examination into the draft Arun Local Plan was on the grounds that the Council's Objectively Assessed Housing Need (OAN) should be reviewed higher than previously proposed (580 units per annum) and that the Council needs to identify more suitable land supply to meet additional housing requirement. As of November 2016, the OAN figure was increased to 919 units per annum or 18,380 units over the plan period 2011-2031. The indicative proposed residential component would make a significant contribution towards these above housing targets.
- 7.4 As discussed in paras. 5.34 to 5.37 above, the latest Housing and Economic Land Availability Assessment (HELAA) (November 2016), which forms part of the evidence base for emerging planning policy documents, identifies the application site as being suitable for residential development with a suggested total yield of 121 dwellings. Given the current housing supply position and the identification of this site as 'developable' it is likely that this site will be formally allocated for housing development in the emerging Local Plan.

- 7.5 Furthermore, as explained in paras 5.43 to 5.44 above, the Updated Housing Needs Evidence (September 2015) demonstrates there is also a need for 991 residential care/nursing home bedspaces over the plan period (an average of 50 per annum). The indicative proposals for a specialist dementia care home would make a significant contribution towards meeting these targets.
- 7.6 Policy DEV20 of the adopted Arun District Local Plan (2003) recognises the need for new residential care homes. Section 3.28 of the Local Plan identifies that the number of elderly persons living in the District is one of the highest in this part of the country and that it is necessary to make provisions for accommodation for the elderly.
- 7.7 The policy states that planning permission will be granted for facilities of this nature within the defined built-up area provided that the proposals will not be detrimental to the amenities of adjoining properties or will not give rise to material changes in the character of the neighbourhood or in the street scene.
- 7.8 Given the comments above regarding the defined built-up area boundary we consider that weight can only be applied to the policy insofar as it is consistent with the NPPF. In this regard weight should be applied to the policy expression that the Local Plan is supportive of the provision of new care facilities to meet an identified need in the District. However, we consider in the context of the identified need, the development boundaries aspect of the policy should be given limited weight. Notwithstanding this, the proposals are in accordance with the policy as the findings of the Noise Report submitted with this planning application show that the proposals will not have a detrimental impact on residential amenity. Furthermore, while designed indicatively at this stage, the proposed care home will be built in three stories with a flat roof and has been developed to be sympathetic to the character of the neighbourhood that bounds the site to the south.
- 7.9 In terms of emerging planning policy, Section 12.6.1 of the Local Plan Publication Version reiterates the demand for care facilities that is highlighted in the adopted Local Plan and Updated Housing Needs Evidence (September 2015). The proposed development accords with policy H DM2 of the emerging Local Plan that proposals for care homes will be assessed against. It is acknowledged that the site is not located within the emerging Built Up Area Boundary, however the site is functionally related to Rustington, and is indeed bound by residential properties to the south (on the other side of the railway line).
- 7.10 As explained in the Design and Access Statement, the proposed development will result in a sustainable form of development. Building for Life principles have been considered within the

proposals alongside a high quality indicative landscaping scheme that will combine to provide a well-designed and comfortable residential facility for future occupants of the care home.

- 7.11 In addition, the proposals include a new pedestrian and cycle bridge over the railway line to the south east of the site to replace the existing crossing. The proposed bridge will significantly improve the safety of the crossing for pedestrians and cyclists and provide convenient links in accordance with policy H DM2.
- 7.12 The application site encompasses land between the A259 and the railway line/Rustington settlement. This land does not serve any strategic function and the proposed development should not be considered as 'urban sprawl' as it is contained by the physical barrier of the A259. As confirmed in the pre-application advice, the site is in a sustainable location for residential development and has a positive relationship to the existing built up areas to the south and to the east within which there are existing shops, services, and communication routes. The site would be physically and visually connected to these existing built up areas.
- 7.13 It is noted that the HELAA (p.171) and pre-application advice refers to the site as having an established Gypsy Traveller Status. However it is confirmed that no part of the application site is currently used for this purpose nor is it the site allocated for a Gypsy Traveller use in any adopted policy.
- 7.14 On the basis of the above, it is clear that that there are strong material considerations that would justify a recommendation to approve this outline application as it is in accordance with the core principle within the NPPF and the presumption in favour of sustainable development as set out in paragraph 14 of the Framework applies. The remainder of this Statement demonstrates that the proposed development is acceptable when assessed against other policies in the Framework and the development plan that are relevant to the determination of this outline application.

8.0 DESIGN AND VISUAL IMPACT

- 8.1 Planning policies support the efficient and effective use of land. Policy GEN7(i) requires new development to respond positively with the identified characteristics of a particular site to create development which respects local characteristics. The Government's Planning Practice Guidance (PPG) advises that design should be appropriate to its context and that new development should be well integrated with and complement the local area.
- 8.2 Policy GEN7 also sets a requirement for schemes to display high quality design and layout. Development should respond positively with the identified characteristics and resources of the site and the area to create attractive places and spaces with the needs of people in mind and respects and enhances local distinctiveness.
- 8.3 Paragraph 7 of the NPPF states that one part of the sustainable development principle is a high quality built environment and para 9 expands by confirming that this is through seeking improvements to the quality of the built environment and widening choice of high quality homes. One of the 'core planning principles' at para 17 is securing high quality design and a good standard of amenity.
- 8.4 The design has also had to respond to a number of site specific constraints including a public right of way which intersects the site, the railway to the south and A259 to the north. The site constraints are illustrated in the submitted site appraisal plan.
- 8.5 As shown in the submitted indicative proposals, the proposed development provides for a high quality residential and care home development which responds well to the above constraints and will be well integrated. The design of the development is a reserved matter at this stage. It will be necessary for the reserved matters submission to comply with Policy GEN7 and the relevant NPPF guidance. The build will be of high quality and will make a positive contribution to the visual amenity and architectural quality of the local area.
- 8.6 From the pre-application response, officers highlighted the importance of the north boundary treatment as the mature hedgerows and trees contribute to the rural character of the area when viewed from the A259. Landscaping is a matter reserved for future consideration, nonetheless the indicative proposals have sought to demonstrate how existing and proposed planting at the site could be incorporated with the indicative proposed layout. The objective for the development would be to retain and enhance where possible the existing hedges and trees to give the

development an established feel from as early as possible. New native trees and hedges will be planted to define areas within the housing layout and create a pleasant leafy environment.

- 8.7 As explained in section 4.0 of the Design and Access Statement, the proposed development will result in a sustainable form of development. Building for Life principles have been considered within the indicative proposals and a BREEAM assessment for the proposed care home will be undertaken at the detailed design stage.
- 8.8 In summary the proposal fully accords with the provisions of design policy at the local and national level. The proposal will not have an adverse impact on adjoining land uses or properties and will not be adversely impacts by those uses that currently exist. The proposals will allow for the safe movement of pedestrians and vehicles and provide vehicle parking in accordance with Policy GEN13 of the Local Plan.

9.0 RESIDENTIAL AMENITY

- 9.1 District Local Plan Policy GEN7 indicates planning permission will only be granted for schemes displaying high quality design and layout. It further indicates development will be permitted if it takes into account impact on adjoining occupiers, land, use or property. The NPPF states that new development should contribute positively to making places better for people.
- 9.2 The detailed design layout is not for approval under this outline application but an indicative layout has been developed in order to test the potential impacts on neighbouring residential amenity.
- 9.3 Policy GEN 32 states that noise sensitive development will not be permitted if its users would be affected adversely by noise from existing or proposed noise generating uses.
- 9.4 The submitted Noise Assessment report was produced in order to assess the site with regards to its suitability for residential development from a noise perspective. The indicative proposals incorporate acoustic fences along the entire lengths of the northern (A259) and the southern (railway) site boundaries. The report concludes that these fences would be sufficient to ensure that there are no adverse noise impacts in relation to existing and proposed developments.
- 9.5 The report recommends that bedrooms at first floor level which overlook the A259 and the railway will require closed windows and upgraded glazing and acoustic vents to achieve BS8233 criteria. With regards to bedroom facades which do not overlook the A259 or railway or living rooms at ground floor level, basic thermal double glazing will be sufficient in terms of noise impacts.
- 9.6 It is therefore concluded that the proposed development will not have a significant adverse impact on the amenity of potential occupiers of the residential or care home development, nor will the proposed development have a significant adverse impact on existing residential development in close proximity to the site. The design and layout of the proposals is reserved for future consideration, however, the indicative scheme demonstrates that it is possible to deliver a form of development on this site that is acceptable from an amenity perspective.

10.0 AFFORDABLE HOUSING

- 10.1 Policy DEV17 refers to Affordable Housing, stating that for both allocated and unidentified housing developments of 25 or more dwellings or residential sites of 0.8 hectare or more, irrespective of the number of dwellings, the Local Planning Authority will seek to secure the provision of affordable housing. The appropriate level and type of provision will be dependent upon identified local housing need, character of the area, suitability of the site and market conditions at the date of the submission of the relevant planning application.
- 10.2 The Council's adopted Interim Affordable Housing Policy (2010) requires 30% affordable housing provision from developments of 15 or more units. In accordance with this policy, the proposed development will provide 27 affordable units on-site which equates to 30% of the total 90 units proposed.
- 10.3 As this is an outline application, the details of the tenure, dwelling type/size and location of on-site affordable housing would be agreed with the Council's Housing Strategy and Enabling Manager as part of a subsequent reserved matters application and subsequently secured via a S106 agreement. As discussed in the Affordable Housing Statement, at this stage we would anticipate that the requirements in terms of the proportion of affordable housing could be secured through a suitably worded planning condition.

11.0 HIGHWAYS, TRANSPORT AND PARKING

- 11.1 A Transport Assessment has been produced to assess the transport and accessibility impacts of the proposal in accordance with paragraph 32 of the NPPF. In addition, a Travel Plan has been produced for the residential component of the site in accordance with paragraph 36 of the NPPF. It should be noted that paragraph 32 of the NPPF states that *“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”*. The Transport Assessment has assessed the cumulative impacts of the development and it is concluded that the capacity of the junctions will continue to operate with spare capacity after the proposals are built.
- 11.2 The detailed access is a matter reserved for future consideration however the illustrative plans show that the proposed access to the site from the A259 is sited broadly in the same location as the existing Brook Lane access. The proposed vehicular access comprises a left in / left out access from the A259 and including a new roundabout which will provide access to the proposed residential development to the west and also land to the east. Vehicles will potentially be able to pass between any retail developments to the east without having to re-join the A259 in between sites.
- 11.3 One of the 12 core planning principles of the NPPF is *“actively managed patterns of growth to make the fullest possible use of public transport, walking, and cycling and focus significant development in locations which are or can be made sustainable”* (paragraph 17). Section 4 of the NPPF relates to ‘promoting sustainable development’ and states that *“the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel”* (paragraph 29). The Travel Plan demonstrates that the opportunities for sustainable transport modes have been taken up and that safe and suitable access to the site can be achieved for all people and therefore accords with the provisions of the NPPF at paragraph 32.
- 11.4 The proposals have been designed to give priority to pedestrian and cycle movement. The layout of the proposal has sought to minimise the conflicts with cyclists and pedestrians, and the design and accessibility of the proposal has had regard to the needs of people with disabilities in accordance with paragraph 35 of the NPPF and in accordance with saved Policy GEN15 of the Arun District Local Plan.
- 11.5 As shown in the indicative proposals and detailed in the Transport Assessment, it is proposed to construct a new pedestrian and cycle bridge over the railway to replace the existing crossing in the south east corner of the application site. The existing crossing is at ground level and is

considered to be dangerous therefore the proposed bridge will significantly improve the safety of this crossing for pedestrians and cyclists.

- 11.6 The pre-application advice stated that the Council would like to see any development at this site be well connected to the Rustington Retail Park to the east and options to link the sites for pedestrians and cyclists.
- 11.7 The indicative masterplan indicates the position of the footpaths and cycle ways which have been an important consideration from the conception of the proposals, and shows that all existing public footpaths will be retained and a new network of footpaths and cycle ways are proposed in order to provide access internally within the site. This also improves links to the surrounding area including to the countryside to the north of the site, the proposed retail developments to the east, the existing shops and facilities in Rustington to the south, and to Brookfield Park and the childrens' playground to the west.
- 11.8 As demonstrated in the indicative proposals, the provision of car parking spaces accords with saved Policy GEN12 of the Arun District Local Plan and the standards in the West Sussex Parking Guidance for New Residential Developments (2010).
- 11.9 The indicative proposals show the potential locations of cycle parking to serve the residential and care home elements of the scheme. As detailed in the Transport Assessment, the proposed development will comply with the Council's SPG and WSCC standards.
- 11.10 Analysis of accident statistics for the area within the vicinity of the site indicates that there are no inherent highway design problems. The proposals have been designed to give priority to pedestrian and cycle movement in order to improve highway conditions and safety for these users, as detailed in section 12 of this Statement below.
- 11.11 In summary, it is concluded that the proposal is easily accessible by public transport and includes provision for access by cycle and on foot and in this respect is considered to be compliant with Policy DEV26 of the Local Plan. The Transport Assessment has assessed the cumulative impacts of the proposed development and it concludes that it would not have a material traffic impact or a detrimental impact on local highway safety and there are no highway or transport reasons that would warrant a refusal of this outline application.

12.0 FLOOD RISK AND DRAINAGE

- 12.1 The NPPF requires development not to give rise to an unacceptable risk of flooding detrimental to human health or property.
- 12.2 A Flood Risk Assessment (FRA) has been prepared by CTP. As shown on Figure 4 on p.10 of the FRA, the vast majority of the application site is within Flood Risk Zone 1, at low risk of flooding. In the south eastern corner of the site there is a small area of land (approximately 0.6ha) located in Flood Zone 2 and a smaller parcel (approximately 0.2ha) within Flood Zone 3. As shown in the indicative layout, the existing and proposed buildings are located entirely within Flood Zone 1 and out of Flood Zones 2 and 3.
- 12.3 The FRA applies the sequential test. In accordance with Table 2 of the NPPF the proposed residential development and residential care home uses are considered as “More Vulnerable” and with reference to Table 3, this type of construction is appropriate in Flood Zone 1 and 2 and the Exception Test is not required.
- 12.4 An initial assessment of the risk of flooding from the different possible key sources from the NPPF lists which could potentially affect the development site has been undertaken based on currently available information that shows the risk of flooding from all sources apart from the river and sea is initially assessed as low. The principle of development in this area is therefore acceptable.
- 12.5 Policy GEN9 requires that planning applications that will materially increase foul and/or surface water discharges will be refused unless that Local Planning Authority is satisfied that either adequate drainage capacity exists or appropriate drainage capacity can be provided as part of the development. Policy GEN9 also requires that consideration is given to the use of SuDS as an alternative to conventional drainage. In terms of drainage, SuDS will be used to ensure that the development does not increase flood risk elsewhere as the storm water discharge rate will be limited to existing levels.
- 12.6 In summary the submitted assessment by CTP demonstrates that the proposed development is acceptable from a flood risk and drainage perspective. The drainage proposals for the site will need to be developed in line with the reserved matters submission in due course, however, the assessment undertaken to date provides sufficient evidence to demonstrate that it will be possible to deliver a housing and care home scheme on the site, without the proposal being at risk from flooding and without impact on the flood risk and drainage conditions off-site.

13.0 ECOLOGY

- 13.1 An extended Preliminary Ecological Appraisal and Building Inspection has been prepared by The Ecology Partnership. A Biodiversity Checklist has also been submitted with this application.
- 13.2 The site is found to be of low ecological value. The site does not fall within or adjacent to any statutory designations, therefore it is considered that there will be no direct or indirect impacts on protected areas. As a consequence local plan policies AREA13, AREA14 and AREA 15 are not considered to be relevant to the application proposals. The habitats on site are common and widespread throughout the local area and UK more widely.
- 13.3 No suitable habitats for breeding great crested newts were present on site. A reptile survey was carried out in June 2016 and it was considered likely that reptiles may be using the edge of the fields on site where longer grass, scrub and ruderal vegetation grow up during the spring and summer. It is recommended that a reptile presence/likely absence survey be carried out to establish whether or not reptiles are present on site.
- 13.4 Low roosting bat potential was found in the dwelling and garage on the site and the report recommends that a dusk emergence/dawn re-entry survey is undertaken in these buildings. In addition, two mature trees on site were found to have low suitability for roosting bats and these are to be retained within the scheme. Furthermore, bat activity and automated surveys are recommended as bats are likely to use the treelines and hedgerows on site for foraging and commuting.
- 13.5 Immediately adjacent to the site along the eastern boundary is a brook which has shown evidence of water voles including latrines, feeding stations and droppings in former surveys. The survey identifies that the habitat is still considered to be of good quality for water voles. Suitable mitigation for water voles is outlined in the report in the event that the access road to the site is widened. This involves displacing water voles from the construction zone prior to commencement and the provision of an additional habitat for water voles in the form of a pond or wet ditch on site.
- 13.6 In summary, the site is not ecologically sensitive, and therefore the proposals should be considered acceptable from an ecological perspective. A number of recommendations have been made and incorporated within the indicative scheme, and further mitigation measures relate to the construction phase of the development to seek to minimise impacts on local ecology.

14.0 TREES

- 14.1 A Tree Report & Impact Assessment has been prepared by ACD Environmental. The survey includes all trees with a stem diameter greater than 75mm at a height of 1.5m that are on the application site or close enough to pose a potential constraint to development.
- 14.2 There are no tree preservation orders present on trees on, or adjacent to the site.
- 14.3 Trees have been assessed for their quality and benefits within the context of the indicative proposed layout. The report states that the development of the site within the proposed parameters is arboriculturally acceptable.
- 14.4 The report concludes that it is appropriate to remove the trees listed in the tree survey and to include suitable and sustainable replacements within the detailed landscape design for the scheme as is currently shown in the submitted indicative proposals. The report considers that this will more than mitigate any loss that may result from tree removal. The proposed development is therefore assessed to be in accordance with local plan policy GEN28.

15.0 CONTAMINATION AND ARCHAEOLOGY

- 15.1 A Phase 1 Desk Study has been prepared by Geo-Environmental to ascertain the geotechnical and geo-environmental factors pertaining to the application site.
- 15.2 The report found that there is potential for contamination to exist at the site due to its historic uses. Possible contamination sources were identified as shallow soils and made ground, an above ground tank, an abandoned car with petrol cans, and ground gases and alluvium. Whilst the individual risk ratings for the potential pollutant linkages identified ranged between moderate and very low, further assessment is likely to be required to better characterise contamination on site and the associated risk to identified receptors.
- 15.3 The report recommends that a ground investigation report is produced in order to confirm geotechnical parameters and geotechnical analysis of the underlying soils. Depending on the outcome of the intrusive investigation, risk mitigation measures may be required to protect future residents on the site. It is suggested that these items could be dealt with by a condition.
- 15.4 An Archaeological desk-based assessment produced by PCA Heritage is submitted with this application and assesses the archaeological potential of the application site and the likely impact of development on the archaeological resource.
- 15.5 The assessment concludes that the site is not shown to be archaeologically sensitive.

16.0 CONCLUSION

16.1 In summary the scheme offers the following benefits:

- Provision of up to 90 dwellings to make a valuable contribution towards Arun District Council's 5 year housing land supply;
- The provision of a dementia care home to meet a current undersupply of facilities in the District;
- The provision of a pedestrian footbridge over the railway line and improved links to the cycle/footpath network;
- Employment in both the construction phase of development, as well as approximately 78 FTE jobs in the care home once open.

16.2 The proposed development has been assessed against the development plan, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and relevant material considerations. On the basis of this assessment it is concluded that the proposals comply with the development plan and therefore, in accordance with the NPPF, should be approved without delay. The NPPF holds that Local Planning Authorities (LPAs) should seek to approve applications for sustainable development where possible and the LPAs should work pro-actively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

16.3 Both policies GEN2 and GEN3 are inconsistent with the provisions of the NPPF and therefore should be discounted for the purposes of the consideration of this application. This is acknowledged within the Council's pre-application response and also in relation to other applications on other sites within the District that fall outside the development boundary including on land directly to the east of the application site.

16.4 The application site is sustainability located in close proximity to existing built development identified as being suitable for residential development in the Council's latest HELAA (November 2016). The indicative proposals would provide up to 90 new residential units of which 30% would be affordable units, thereby making a significant contribution to the Council's current housing target of 919 dwellings per annum and assisting with alleviating pressure on the severe lack of housing land supply in the district. The proposed development will also provide a care home of up to 72 bedspaces and a facility of this nature in the district to meet the demonstrable local and national demand.

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- 16.5 In addition to the above strategic benefits, the proposed scheme would also improve access in and around the site and would seek to construct a new pedestrian and cycle bridge over the railway to replace the existing crossing in the south east corner of the application site in order to significantly improve the safety of this crossing for pedestrians and cyclists which at present is considered to be dangerous.
- 16.6 The proposal is considered to be acceptable having regard to each of the relevant policies that are consistent with the NPPF providing a high quality and sustainable form of development that will not cause harm to amenity or cause significant adverse traffic impacts. It is therefore considered that the proposal represents sustainable development and should therefore be approved without delay in accordance with the NPPF.

**APPENDIX 1: ARUN DISTRICT COUNCIL PRE-APPLICATION ADVICE
 (REF. PAA/43/16/) DATED APRIL 2016**



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website: www.arun.gov.uk/planning

Your Ref: SP/AJC/9716

Our Ref: PAA/43/16/

Please ask for: Mrs A Gardner

29 April 2016

Dear Ms Page

Pre-Application Advice

Mixed use development including residential & commercial uses.

Land at Brook Lane Rustington

I write regarding the above matter and your enquiry received on 7th March 2016.

Description Of Proposed Development

From the details submitted, I understand that you propose to develop the site with a mix of residential and commercial uses. No layout or elevation plans have been submitted for consideration.

Description Of Site

The site is located south off of the A259 and west of Mill Lane. The site is currently undeveloped greenfield land. The topography is generally flat but is at a lower level than the A259 to the north of the site and lower than Mill Lane to the east. The site area is 4.41 hectares. There are trees along the sites boundaries of various species and a grass verge separates the site from the A259. A former gypsy pitch site is located within the site to the west.

Description Of Locality

The area is rural in character with the main neighbouring uses ranging from a golf course to the north of the A259; railway line to the south abutting the site; industrial estate behind the railway track to the south; retail uses to the far east of the site, separated by the Mill Lane road bridge adjacent to the new garage showroom site which is nearing completion. Works have also started on the adjoining site to the east for retail uses. The main views of the site are from the A259.

Planning Issues

The following issues have been identified for consideration.

Principle
Design
Neighbour Amenity

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Amenity Space Provision
 Affordable Housing
 Highways, Transport and Parking
 Flooding/Drainage
 Open Space Provision
 Light Pollution
 Noise Pollution
 Biodiversity
 Landscape Impact
 Gypsy and Traveller Guidance

Relevant Planning History

Relevant Policies - the following policies are considered relevant to your proposal:

Arun District Local Plan:	GEN12	Parking in New Development
	GEN14	Public Transport
	GEN2	Built-up Area Boundary
	GEN3	Protection of the Countryside
	GEN32	Noise Pollution
	GEN33	Light Pollution
	GEN34	Air Pollution
	GEN7	The Form of New Development
	GEN8	Development and the Provision of Infrastructure
	GEN9	Foul and Surface Water Drainage
	DEV8	Circumstances in which Additional Development may be Permitted
	DEV17	Affordable Housing
	EDDM1	D DM1 Aspects of Form and Design Quality
	EDDM2	D DM2 Internal Space Standards
	EDDM3	D DM3 External Space Standards
	EDSP1	D SP1 Design
	ESDSP1	SD SP1 Sustainable Development
	ESDSP2	SD SP2 Built-Up Area Boundary
	ECSP1	C SP1 Countryside
	EEMPSP1	EMP SP1 Employment land provision
	EHDM1	H DM1 Housing Mix
	EHSP2	H SP2 Affordable Housing
	EHSP5	H SP5 Traveller & Travelling Showpeople Accommodation
	EQEDM1	QE DM1 Noise Pollution
	EQEDM2	QE DM2 Light Pollution
	EQEDM3	QE DM3 Air Pollution
	EQESP1	QE SP1 Quality of the Environment
	EENVDM3	ENV DM3 Non Designated Sites
	NEAEH3	Angmering Neighbourhood Plan 2014 POLICY EH3
	NEAHD1	Angmering Neighbourhood Plan 2014 POLICY HD1
	NEAHD3	Angmering Neighbourhood Plan 2014 POLICY HD3
	NEAHD4	Angmering Neighbourhood Plan 2014 POLICY HD4
	NEAHD5	Angmering Neighbourhood Plan 2014 POLICY HD5
	NEAHD6	Angmering Neighbourhood Plan 2014 POLICY HD6
	NEAHD7	Angmering Neighbourhood Plan 2014 POLICY HD7
	NEAHD8	Angmering Neighbourhood Plan 2014 POLICY HD8
	NEAHD9	Angmering Neighbourhood Plan 2014 POLICY HD9
	NEATM2	Angmering Neighbourhood Plan 2014 POLICY TM2
	NPPG	National Planning Practice Guidance

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Principle

The site is outside the Built-up Area Boundary, in a location where, in accordance with Local Plan policy GEN2, development will not be permitted unless it is consistent with other Local Plan policies. The site therefore forms part of the countryside which Local Plan policy GEN3 safeguards for its own sake and where development will not be permitted unless it meets certain criteria (which the proposal would not).

As described above, the surrounding area is rural in character with open fields to the north, and west. Road users driving along the A259 at this point have a clear impression that they are entering a countryside area. The proposed development would not, therefore, be in keeping with its immediate surroundings and it would conflict with the aim of Local Plan policy GEN7 to protect and enhance the quality of the environment.

The proposed development would conflict with policies GEN2 and GEN3, but its effects in relation to these are tempered by the physical characteristics of the area and by the status which is now attached to these policies. These policies seek to focus development within built up areas however these boundaries have reduced weight as they are time expired since they do not relate to housing provision beyond 2011. The way these policies are expressed through boundaries on the ground has become out-of-date.

It is recognised that the weight ascribed to these policies needs to be assessed in accordance with the NPPF. Those policies in the Local Plan have been saved and retain the full standing of development plan policies. The Framework states that policies not adopted since 2004 should be given due weight according to their degree of consistency with the Framework. Recent Inspector's decisions have commented to the effect that there is a timeless element to countryside policies, as an aim of the Framework is to recognise the intrinsic character and beauty of the countryside (not unlike the intention of policy GEN3 to safeguard the countryside for its own sake).

The Arun Local Plan 2011-2031 Publication Version reflects the need to provide housing on land outside of the defined built up areas. It sets out allocations for future housing for Parish and Town Councils that they should bring forward over the plan period. Policy H SP1 of the Plan requires Neighbourhood Plans to bring forward proposals for housing delivery.

This site is not identified for development in Angmering Neighbourhood Plan.

The Council is currently unable to demonstrate a 5 year, National Planning Policy Framework compliant, supply of housing and with the current objectively assessed housing need for the District at 845 dwellings per year and completions below the required rates, it is clear that housing supply needs to be maintained. This means that the Council should not be refusing applications for development outside of the built up area boundary solely on the grounds of principle.

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision taking. This site will be sustainably located close to shops, services and existing communications routes and would be physically and visually connected to the existing built up area to the east. Permission has recently been granted for retail development on the adjoining site to the east under A/123/15/OUT and A/19/15/PL.

It is considered that the application is acceptable in principle despite being located on a greenfield site outside of the built up area boundary. It will be assessed against normal development control criteria and regard will be had to the Neighbourhood Plan.

The site is located in an area that has previously been rejected as suitable for housing in the

SHLAA and is contrary to policy HD1 of the Angmering Neighbourhood Plan which states development shall be focused within the built up area boundary and the site does not fall within an allocated site within the Plan.

While, the Council has given permission for commercial development on the adjoining site to the east it was granted under a specific set of circumstances through Local Plan Policy DEV8 and only approved on the basis of a signed S106 agreement restricting it to be used to support local firms. This policy aims to support local businesses by enabling them to relocate and expand. The proposal in this instance is not believed to meet these criteria. There is no reference made to provision for local based companies.

The site includes a gypsy site which has historically made an important contribution to the Council's gypsy site provision within the District. The policy officer has stated 'Policy H SP5 in the Arun Local Plan 2011-2031 Publication Version 2014 should be taken into account which states that planning permission will not normally be granted for development involving the loss of lawful accommodation for Travellers or Travelling Showpeople unless alternative provision is made to make good any loss. The Annual Monitoring Report 2014-2015 shows that the site has 2 permitted Gypsy and Traveller pitches under a personal permission.'

Design

Planning Policies and Central Government Advice support the efficient and effective use of land. Policy GEN7(ii) requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics. Central Government Advice further indicates that more intensive development is not always appropriate and that design which is inappropriate in its context should not be accepted. Furthermore new development should be well integrated with and complement the local area in terms of, for example, layout.

The design aspect of your proposal cannot be commented upon since no details relating to layout or elevations have been submitted. Given the visual prominence of the site the design of the proposed units will be of paramount importance in the consideration of the application.

Some concern exists regarding the north boundary treatment and road side verge. Along this southern stretch of the A259 there are mature hedgerows and trees. They contribute strongly to character of the area. For road users they help establish the rural character of the area and enunciate and distinguish this area from the surrounding built-up areas. When viewed from within the strategic gap they add to the character and nature by obstructing views of vehicles and hard surfacing along the A259.

To ensure delivery of the design the Council consider that a detailed and comprehensive Design and Access Statement will be required for the application to explain the design approach. Secondly, the Council will seek to work with the applicant during the determination of an application to include conditions to ensure the delivery of the design approach submitted at application stage.

The Council's Economic Development Officer has stated they would be concerned about the effect of further retail development in this area. Further details would be required in order to give a full view. However it is noted that retail use has not been proposed.

The proximity of the proposed residential units to the proposed commercial and approved adjoining retail uses would need to be carefully considered.

Neighbour Amenity

Arun District local Plan Policy GEN7 indicates planning permission will only be granted for schemes displaying high quality design and layout. It further indicates development will be permitted if it takes into account impact on adjoining occupiers, land, use or property. The

residential amenities of the neighbouring property to the north of the site must be fully considered in any submitted application.

Amenity Space Provision

Policy GEN7 of the Arun District Local Plan indicates that development will be permitted provided that amongst other considerations the proposal creates attractive places and spaces with the needs of people in mind. On this basis, well designed and adequate amenity space provision for residents is considered essential to meet the policy requirements of the local plan and Central Government Advice. All applications for residential development are considered in relation to compliance with policies DDM2 Internal Space Standards and DDM3 External Space Standards of the emerging Local Plan. Further you are advised to make provision for open space in accordance with the standards set out in the adopted 'Open Space and Recreation Standards - Supplementary Planning Guidance' of the Arun District Local Plan.

Affordable Housing

In implementing its Affordable Housing Policy, the Council will seek 30% affordable housing on-site on residential developments of 15+ residential units. The tenure, dwelling type/size and location of on-site affordable housing must be agreed with the Council's Housing Strategy and Enabling Manager. He has been consulted on your proposal and has recommend that the Council's Affordable Housing Policy be applied to any application.

Highways Transport And Parking

Planning policies allow for the safe movement of pedestrians and vehicles, giving priority to pedestrians, and car parking. Car parking requirements will vary according to accessibility of the site to public transport or services, or location within a town centre. Some Guidance is provided within Appendix 2 Parking Standards of the Arun District Local Plan.

Parking- The planning application should be accompanied by information regarding the level of parking to be provided (this can be included in the Transport Assessment if required). Some concern exists regarding the level of parking relative to the floor area proposed, especially given the fact that the majority of the floor space will be for bulky goods which require access by car.

The District Council would like to see any development at this site to be well connected to the Rustington Retail Park to the east. A key barrier to their successful integration is Mill Lane which separates the sites. The applicants should consider options to link the sites for pedestrians and cyclists, and details of how these two retail parks are to be linked should be submitted with any planning application.

Previous applicants have suggested the provision of a separate cycle route running along the rear of the site that would compliment the existing cycle way to the east of the site that runs along and adjacent to the A259. This would be a welcome addition to the highway network in the area and will be a consideration that would fall in favour of any application that is submitted.

It is strongly suggested that the applicants engage with West Sussex County Council for pre-application advice on highways and transport especially regarding the access onto New Road.

Flooding

The National Planning Policy Framework requires development not to give rise to an unacceptable risk of flooding detrimental to human health or property. There are requirements regarding the submission of a Flood Risk Assessment and Sequential Test documentation. The relevant requirements for these are dependent upon the designated flood zone that the site is located within. The Environment Agency website details designated flood zones.

Light Pollution

Planning policies emphasise the need to consider the impact of light on neighbouring uses and wider landscape, Light levels should be the minimum required for security and working purposes, and minimise potential glare and spillage.

Noise Pollution

Any development proposal would need to demonstrate that the Local Plan policies which emphasise that noise sensitive development will not be permitted if its users would be affected by noise by proposed noise generating uses have been satisfactorily addressed.

Landscape

Para 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment, which includes protecting and enhancing valued landscapes. Policy GEN7 of the Local Plan requires proposals to show adequate consideration to and use of existing landscape features.

The site lies within an area designated as a Biodiversity Opportunity Area in the emerging Local Plan and therefore policy ENV DM3 is relevant.

Landscape Comments

The Council's Parks and Open Space/Arboricultural Officers have made the following comments
Arboricultural Comments:

The key here will be for the applicant to observe BS5837:2012 recommendations where there are trees which might have an impact on the development proposals and vice versa that a full tree survey is undertaken and an Arboricultural Impact Assessment prepared to include the Root Protection Areas of these trees and show this on a plan and then the report should detail how any potential adverse impact on the trees will be avoided and works undertaken outside of the RPA's and the shelterbelt screens fenced off with protective fencing - the Plans that they should be submitting are:-

- Tree Survey & Constraints Plan - clearly showing the RPA's for all trees plotted accurately on a scaled plan base. This would also include trees not on site, but may have RPAs extending into the site.
- Tree Retentions and Removals Plan - clearly showing which trees are to be retained and which will be removed.
- Tree Protection Plan - clearly showing the positioning of protective fencing and including a specification for same. This protective fencing must be static and once installed prior to the development starting, should not be removed until all construction works has been completed. It must also meet the BS5837:2012 requirements for height and structural strength. Any construction work that has to be done in the RPAs should have all the relevant justification/mitigation. This method of mitigation that would be expected would be arboricultural supervision (from a qualified arborist), also correct use of equipment i.e. hand tools.

Landscape Comments- Any trees or vegetation that fall within the proposed or periphery of the development, may provide significant aesthetic impact to the location. Any trees in particular along the boundaries, which adjoin neighbouring properties could provide potential valuable screening and should be protected and retained. Any considered tree works within the site should be agreed with Arun District Councils Tree Officer. Root protection Areas (RPA) from the tree cover to the North and South of the site should extend into the development site. Before construction, a tree protection scheme must be in place for these adjacent trees whose root protection areas fall within the construction zone from neighbouring land. This would be required for both construction and heavy vehicle movements for deliveries. This should be in accordance with BS 5837:2012 'Trees in relation to construction'

Forming part of the application, a full landscape scheme should be submitted for approval, detailing species choice, position, densities and size at time of planting. This should be plotted in plan and list form and in relation to the trees and vegetation to be retained so that a clear picture

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of the proposals can be seen. These details are required to ensure that appropriate screening is provided, maintaining and uncompromising the setting and ensuring that the proposals fit within the area of neighbouring properties and proximity to neighbouring South Downs National Park, whilst benefiting the potential of the proposed developments usage.

Whilst no detail has been given at this stage of residential use, it is stated that this may form a substantial part of the mix of uses. Careful consideration must be given to the siting of this and the associated public open space provision which would be sought in this instance. This would also be subject to section 106 agreements for infrastructure and offsite leisure provision and management proposals going forward.

Drainage Engineers Comments

The Council's Drainage Engineers have made the following comments:

Any proposed surface water drainage scheme will need to consider the use of sustainable drainage principles (SuDS).

SuDS Selection

The design will need to follow the hierarchy of preference for different types of surface water drainage systems as set out in Approved Document H of the Building Regulations and the Sustainable Urban Drainage System (SUDS) Manual produced by CIRIA. This means that the developer must first consider the discharge of surface water into an infiltration device (eg. soakaway, basin, swale, permeable paving etc) before considering any other method.

Infiltration Drainage Design

Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE 365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 30% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location.

Any SUDS or soakaway design will need to include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design.

Some parts of the site are within Flood Zone 2 and 3. The EA will have more information on how this would affect development proposals, but please also see the NPPF technical guidance. Surface water flooding may be an issue on some parts of the site. West Sussex County Council may have more information as LLFA.

Environmental Health Comments

The Council's Environmental Health Officers have made the following comments:

There is potential for noise from the A259 and railway line to affect future occupants of the residential properties planned for this site. In addition, I note that there are plans to provide a mix of uses within the site which could provide further noise sources to future residents. As a result the developer should provide a comprehensive noise impact assessment for the planned use of the site taking into account all the potential noise sources which could affect the future occupants. I would suggest that the applicants make reference to the Planning and Noise Advice Document: Sussex (March 2013) and also to relevant assessment criteria for example BS 8233: 1999 and potentially BS4142 for noise from any industrial noises sources on the site. A report should be submitted which details how the assessment has been undertaken, the results and mitigation measures required for the development.

- Please also include a desktop study and walkover survey in connection with potential land contamination of the site with any application. (Environmental Health believe that waste disposal via burning may have taken place at the premises.)

Conclusion

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Any proposals on the site for commercial or residential development are likely to be refused unless the loss of the recognised gypsy and traveller site is fully justified and mitigated.

The submission will need to demonstrate that it is in line with NPPF paragraph 14 where permission will be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits,....The details submitted are not sufficient for a view to be taken on this point.

Any application submitted will also have to respond to the fact that the site conflicts with the Angmering Neighbourhood Plan.

Should the above points be responded to positively, and to our satisfaction, then the layout and design of the site would be crucial to any permission being obtained. The inclusion of green roofs and other forms of sustainable building methods would be welcomed.

Follow Up Meeting

Your pre application advice fee included a meeting, if this has not already been held, please contact me to arrange a convenient appointment.

Making an Application

If you decide to proceed with making an application you will need to quote the reference number for this advice in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

You will also need to submit the following documentation/information:

Fully completed and signed Application Form with full description of the proposal.
Ownership Certificate and Agricultural Land Declaration
Design and Access Statement
Correct Fee
Location Plan (1:1250)
Site / Block Plan (1:500)
Elevations (Existing and Proposed)
Floor Plans (Existing and Proposed)
Roof Plans
Environmental Impact Statement

Additionally the following documents will need to be provided:

Please note that the Council introduced a new Local Validation Requirements List in July 2013 which you should refer to before submitting your application. Failure to provide the required documentation and to complete the Validation Checklist and the Biodiversity Checklist will result in the application being treated as incomplete and delay the validation of the planning application.

Having looked though the Local Validation Requirements List, I would suggest that the following additional documents will be required:

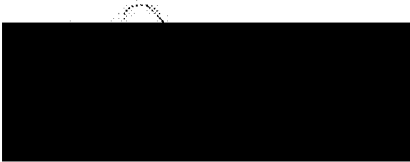
Biodiversity Survey and Report
Flood Risk Assessment
Foul and Surface Water Drainage Statement
Landscaping Strategy
Lighting Assessment
Noise Statement
Bin Storage and Collection Provision
Parking Plan

Plannning Application Summary
Transport Statement
Tree Survey and Arboricultural Report

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case Officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the Case Officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request. Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely



Karl Roberts
Director Planning & Economic Regeneration

APPENDIX 2: SUMMARY OF RELEVANT DEVELOPMENT PLAN POLICIES

Adopted Development Plan Policies

Arun District Local Plan (2003)	
GEN2	Built-up Area Boundary
GEN3	Protection of the Countryside
GEN7	The Form of New Development
GEN8	Development and the Provision of Infrastructure
GEN9	Foul and Surface Water Drainage
DEV17	Affordable Housing
DEV20	Rest and Nursing Homes
GEN12	Parking in New Development
GEN14	Public Transport
GEN15	Cycling and Walking
GEN18	Crime Prevention
GEN20	Provision of Public Open Space within New Development
GEN25	Water Resources
GEN32	Noise Pollution
GEN33	Light Pollution
GEN34	Air Pollution

Angmering Neighbourhood Plan (2015)		
Policy	Policy Name	Comment
HD3	Housing Mix	The proposals seek to contribute to providing much needed residential accommodation and care home facilities in the District. The application is in outline stage with all matters reserved including design. The indicative proposals identify a range of housing sizes that provide 1-4 bedrooms in a combination of small apartment blocks, terraces, semi-detached and detached housing.
HD5	Built Form	Scale, design and appearance are matters reserved for future consideration; however the indicative proposals show that the residential development and care home are designed to follow established plot widths and follow the character of existing built form, creating a positive addition to the style and mix of the area. While indicative, the proposed development has been designed to be in keeping with its surroundings and character of existing built form adjacent to the site in accordance with policy HD5.
HD7	Housing Density	The indicative layout demonstrates that the development is proposed at a similar density to the existing residential area to the south of the site in compliance with policy HD7.

HD8	Parking for New Developments	Policy HD8 encourages proposals to make use of WSCC parking standards. The indicative parking plan submitted with the planning application shows parking provision in line with the Council's adopted standards.
TM1	Local Highways	Proposals for new development must demonstrate that adequate provision has been made to mitigate the impact of the traffic generated both during development and on completion. The detailed access is a matter reserved for future consideration however the illustrative plans show that the proposed access to the site from the A259 is sited broadly in the same location as the existing Brook Lane access. The indicative access has been tested by transport consultants Mayer Brown and is considered to be acceptable.
TM2	Cycling Walking & Equestrian	Policy TM2 states that support will be given to proposals that improve the network of cycle ways, footways and footpaths. The proposals include the replacement of the existing railway crossing to the south east of the site with an improved crossing facility for pedestrians and cyclists in accordance with Policy TM2. The permeability of the site in terms of pedestrian and cycle access has been a priority, including the protection of existing PRoW.
EH3	Flood Prevention	The proposals have been developed to ensure that the prospect of flooding within the site boundary and the surrounding area is mitigated.
Littlehampton Neighbourhood Development Plan (2014)		
Policy	Policy Name	Comment
22	Design of New Development	The proposals have been designed in compliance with the adopted West Sussex 'Guidance for Parking in New Residential Developments' Supplementary Planning Document (2010) as required by Policy 22.

Emerging Development Plan Policies

Draft Arun Local Plan (Publication Version October 2014)	
INF SP1	Infrastructure Provision and Implementation
H SP2	Affordable Housing
SD SP1	Sustainable Development
D DM1	Aspects of Form and Design Quality
OSR DM1	Open Space, Sport and Recreation
H DM1	Housing Mix
H DM2	Independent Living and Care Homes