

PLANNING STATEMENT

LAND OFF ARUNDEL ROAD, ANGMERING

MARCH 2018



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EXECUTIVE SUMMARY

- i. This planning statement supports an outline planning application made by Gladman Developments Limited for a site at land off Arundel Road, Angmering. The description of development is:

“Outline planning application for the erection of up to 200 dwellings with public open space, landscaping and sustainable drainage system (SuDS) with vehicular access point from Arundel Road, full sized adult football pitch and the demolition of industrial units, and one residential dwelling. All matters reserved except for means of access.”
- ii. The application is made in outline, with all matters reserved except for access. The access details provide certainty that the site can be accessed acceptably and safely by vehicles, cyclists and pedestrians.
- iii. The application site represents a suitable and sustainable location for housing, well located to the existing urban area. The proposal offers the opportunity to deliver:
 - local benefits, through investment in the local community;
 - district wide benefits, in terms of making a strategically important contribution to housing supply and economic objectives; and,
 - national objectives in boosting the supply of homes and delivering sustainable development.
- iv. The proposed development has been carefully considered to ensure that it will provide high quality, sustainable development. The design-led approach, informed by consultation with the local planning authority, key stakeholders and the local community responds sensitively to the site setting, respecting the grain of the surrounding landscape, both built and undeveloped. The development will be a positive addition to Angmering complementing the character of the surrounding area in terms of scale, density, character and quality.
- v. Development proposals should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The adopted Local Plan is time expired and does not include a requirement which meets the full objectively assessed needs (FOAN) for market and affordable housing. As the Local Plan was not designed to provide for development needs after 2011, and does not provide an effective planning policy strategy for the delivery of current needs, it is inconsistent with paragraph 47 of the Framework and attracts reduced weight in the planning balance. The Framework paragraph 14 ‘tilted’ presumption in favour of sustainable development applies.
- vi. Furthermore, the Council cannot demonstrate a 5 year supply of deliverable housing sites. Relevant policies for the supply of housing (GEN5) are therefore out of date in accordance with paragraph 49 of the Framework. This also triggers the Framework paragraph 14 ‘tilted’ presumption in favour of sustainable development.

- vii. The Angmering Neighbourhood Plan was made on 11th March 2015 and forms part of the Development Plan for the proposed development. However, the Neighbourhood Plan pre-dates the recent updates to the Districts FOAN and revised housing requirement within the emerging Local Plan, which is substantially higher than what the Neighbourhood Plan was based. The provisions of the Neighbourhood plan are therefore out of date and a very different planning strategy is required. Gladman notes that Angmering Parish Council intends to review the Neighbourhood Plan to reflect the increased housing requirement.
- viii. The Angmering Neighbourhood Plan also does not comply with all the requirements of the ministerial statement of December 2016, which has subsequently been embedded in to the PPG Paragraph: 083 Reference ID: 41-083-20170810. The relevant policies in relation to the supply of housing in the Neighbourhood Plan are out of date and should be attributed limited weight.
- ix. In the circumstances, while the proposal would conflict with the current Development Plan in relation to policies concerning development in the open countryside and settlement boundaries, those policies are restrictive of development and should be accorded limited weight. There are changed planning circumstances and important material considerations that justify development management decisions that depart from the provisions of the current statutory development plan. The conflict with the development plan in this regard should therefore be given limited weight.
- x. An assessment against the up to date provisions of the Local Plan and the Framework where relevant, demonstrates the scheme comprises sustainable development:
- The proposals will deliver a range of benefits, including making a significant contribution towards meeting objectively assessed market and affordable housing needs of the District, in a situation where the cannot demonstrate a deliverable five year housing land supply and the provision of land for a full sized adult football pitch on site, promoting a healthy and active lifestyle for new and existing residents.
 - Any harm identified arising from the development of a largely greenfield site beyond the current settlement boundaries, is limited in scale and magnitude. The loss of a small amount of low quality employment uses on the site is justified due to the District's surplus of employment land; and, when balanced against the acute shortfall of housing land.
 - There are no policies of the Framework which indicate permission should be restricted.
- xi. In summary, the identified harm arising as a result of the development would not be considered sufficient, either in combination or by themselves, to outweigh the benefits of delivering housing as proposed. There are significant material considerations which outweigh the statutory presumption in favour of the Arun Development Plan, which overall justifies the grant of permission for the development proposed.

1 INTRODUCTION

1.1 Scope of the Planning Statement

1.1.1 This Planning Statement has been prepared in support of an outline planning application for the development of up to 200 dwellings at land off Arundel Road, Angmering. The application is submitted by Gladman Developments Limited (Gladman).

1.1.2 The description of the development is as follows:

“Outline planning application for the erection of up to 200 dwellings with public open space, landscaping and sustainable drainage system (SuDS) with vehicular access point from Arundel Road, one full sized adult football pitch and the demolition of industrial units, and one residential dwelling. All matters reserved except for means of access.”

1.1.3 The starting point for the determination of this application is the Development Plan, comprising of the saved policies from the Arun District Local Plan, (2003) and the Angmering Neighbourhood Plan (2015). As a matter of principle, the development, as proposed, is not in accordance with the Development Plan as it primarily as it directs housing outside of currently defined settlement limits.

1.1.4 However, the Development Plan is out of date and it is inconsistent with Government policy set out in the National Planning Policy Framework (‘the Framework’). The Framework sets out the requirement to boost significantly the supply of housing (paragraph 47) and in the circumstances, the presumption in favour of sustainable development (paragraph 14) applies.

1.1.5 The development, as proposed, is sustainable and will help deliver the new homes needed to meet identified local housing need, helping address a key economic and social priority for the government and Arun District Council (the Council).

1.1.6 This Planning Statement explains why development is needed in this location and the significant social, environmental and economic benefits that the proposal will bring to the area. It also confirms, drawing on the supporting technical information, that no significant and demonstrable adverse impacts would arise as a consequence of the development, to outweigh these benefits.

1.1.7 The Statement further explains the policy context and how the proposed development complies with the Framework and why it is appropriate to bring forward development now at this site.

1.1.8 This Statement is one of a suite of documents submitted to support this application and comprehensively demonstrates the suitability and sustainability of the site for development, as proposed.

1.2 Site Location

1.2.1 The 9.1 ha site lies adjacent to the existing residential development on the edge of Angmering in the parish of Angmering.

- 1.2.2 The settlement lies approximately 4.5km to the north east of Littlehampton and approximately 8km to the west of Worthing.
- 1.2.3 The site is shown outlined in red in Figure 1.

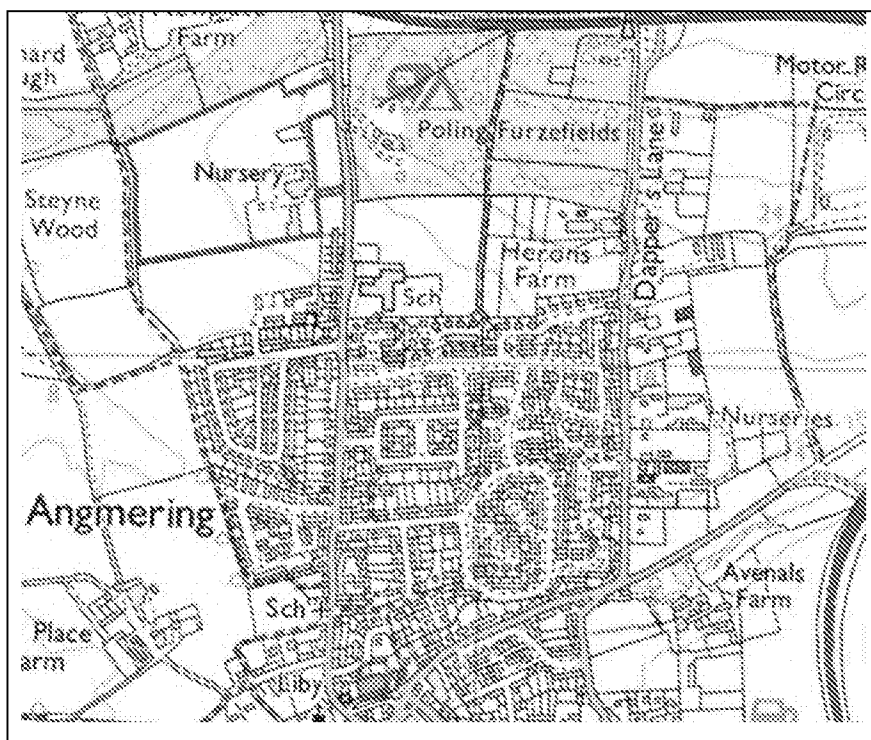


Figure 1: Location Plan

- 1.2.4 The site is situated within approximately 1km of the centre of Angmering and it is close to existing shops, services and employment opportunities in the village. The site's proximity to key services and facilities is shown in Figure 3.9 of the Design and Access Statement (DAS) and details of facilities are shown within the Transport Assessment.

1.3 Suitable location and Sustainable Site

- 1.3.1 The application site comprises 9.1 ha of land which has mixed usage. Approximately 2.45 ha of the site is brownfield land, taken up by a single residential dwelling and a small business area which consists of various utilitarian structures that currently project a poor outward appearance. The small business area is bound by low hedging along its northern and western boundary and a continuation of the site's existing boundary vegetation along its southern boundary. The site is adjacent to a linear area of separately owned land to the east which has outline consent for 9 dwellings¹, which itself abuts the north-eastern corner of the site, which currently consists of a square shaped derelict area containing some part-demolished structures.
- 1.3.2 The site is bounded to the north by a small copse and a residential property. To the west the site is bounded by a well-established hedgerow, beyond which are agricultural fields. The southern

¹ Application reference: A/131/16/OUT.

boundary consists of a chain-link fence beyond which is a line of well-established trees which helps to define an area of playing fields and a sports club beyond. To the east of the site is Arundel Road and the existing housing commitment referenced above. The site is currently accessed via a tarmac access road from Arundel Road.

- 1.3.3 The site is well related to the settlement and it is contained by physical features at its urban edge. The development would represent a logical extension to Angmering.
- 1.3.4 The following is relevant in terms of the site's suitability and sustainability for development:
- The site is well contained within the landscape and important trees and other landscape features are retained;
 - The local highway network has capacity to accommodate the additional traffic associated with the development, without the need for any mitigation measures;
 - The Ecological Impact Assessment prepared by CSA confirms that with the implementation of some straightforward mitigation measures as proposed with this scheme, the development is not anticipated to result in any residual significant adverse effects to important ecological features. The development will deliver net benefits for wildlife in the form of additional habitats, with the opportunity to provide additional biodiversity enhancement measures alongside the new housing.
 - The application site falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding);
 - There are no designated heritage assets within or immediately adjacent to the site, and the development is not considered to affect the setting of any listed buildings.
- 1.3.5 The DAS prepared by CSA Environmental and submitted in support of the application sets out how the site can accommodate the quantum of development proposed in a manner which reflects the local landscape character and the edge of Angmering.
- 1.3.6 In summary the application site presents an opportunity for the sustainable growth of Angmering.
- The land to which the development proposals relate is not of high environmental value.
 - The site is suitable for residential development in terms of its general location and characteristics.
 - There are opportunities through development to improve the environmental conditions of the area.

2 THE NATIONAL HOUSING CRISIS

2.1 Introduction

- 2.1.1 It is widely acknowledged at all levels that there is a housing crisis in this country, which has arisen as a direct consequence of too few houses being completed to keep pace with a growing population and household formation rates. The solution to address this pressing national issue is a sum of the individual parts, i.e. every local authority must ensure that a five year supply of housing is achieved urgently against up to date, objective assessments of their needs. This section of the Planning Statement will set out the context to the national imperative to boost significantly the supply of housing, the response required of Arun Authority and the observed effects on affordability in the District.

2.2 The Government's Assessment and Response to the Housing Crisis

- 2.2.1 In recognition of this problem, the former Planning and Housing Minister, Brandon Lewis announced in 2015 the Government's intention to build 1 million additional homes by 2020 (equating to approximately 200,000 new homes per annum). Even this commitment falls short of the number of homes identified as actually being required by the National Housing Federation², the research of whom indicated that 245,000 new homes per annum are required. At the 2017 General Election, all three major parties had manifesto commitments to build between 200-300,000 new homes per annum, dependent upon the start and end dates adopted.
- 2.2.2 The highest collective period of housebuilding completions per annum was in the 1960's when an average of 340,000 homes a year were constructed. Since the 1970's there have been an average of 160,000 new homes constructed each year in England (DCLG Live table 104).
- 2.2.3 In July 2016, the Economic Affairs Committee released its 'Building More Homes' report. This criticised the Government's housing policy for setting a new homes target that fails to meet the needs of the country. The 'Building More Homes' report provides data on the changes in net housing stock in England between 2007 and 2015. This is summarised in the table below:

Year	Net Additional Dwellings
2007/08	207,480
2008/09	166,590
2009/10	128,670
2010/11	121,210
2011/12	134,890
2012/13	124,730
2013/14	136,600
2014/15	170,000

² Research issued in 2015 from the National Housing Federation highlighted a massive shortfall (over 500,000 homes) in the number of homes built in England between 2011 and 2014. The Federation calculated that 974,000 homes (effectively 245,000 a year) should have been constructed over that period to meet the country's housing needs.

- 2.2.4 The shortfall in the construction requirement has recently been ratified by the Housing White Paper in which the foreword (from the Secretary of State, the Rt Hon Sajid Javid MP) and the Introduction on Page 9 states:

“This country doesn’t have enough homes. That’s not a personal opinion or a political calculation. It’s a simple statement of fact.”

“The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under supply.”

- 2.2.5 Through the Autumn Budget 2017, the Government has pledged to build an even higher number of homes, at 300,000 per year³.

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

- 2.2.7 The pressing nature of the situation and its social and economic importance is reflected by a November 2016 update from the Lyons Housing Commission⁴ reminding us how, after decades of failure to build the homes the country needs, public concern about housing is the highest it has been for 40 years and tackling the housing crisis has risen up the national political agenda to become embedded as a top priority for Government.

- 2.2.8 The report also identifies that current projections suggest we will fall far short of the Government ambition to build 1 million homes by 2020 (let alone up to 300,000 per annum that the Government acknowledge could be required). It states:

“For the new Prime Minister, the Secretary of State for Communities and Local Government, Sajid Javid and Minister for Housing, Gavin Barwell, a sustained step change in house building will be critical to the health of the national economy and to improving the quality of life for current and future generations.”

- 2.2.9 The foreword by the Secretary of State, Sajid Javid, to the Government Housing White Paper which followed confirms a significant change in the pace of housing delivery is required to have any effect on the housing crisis we face:

“For decades, the pace of house building has been sluggish at best. As a result, the number of new homes has not kept pace with our growing population. And that, in turn, has created a market that fails to work for far too many people.

³ <https://www.gov.uk/government/publications/autumn-budget-2017-documents/autumn-budget-2017>.

⁴ The Lyons Housing Commission, an independent group of 12 housing experts chaired by Sir Michael Lyons, was first convened in 2013 to advise on how a future government might bring about a sustainable increase in house building in England.

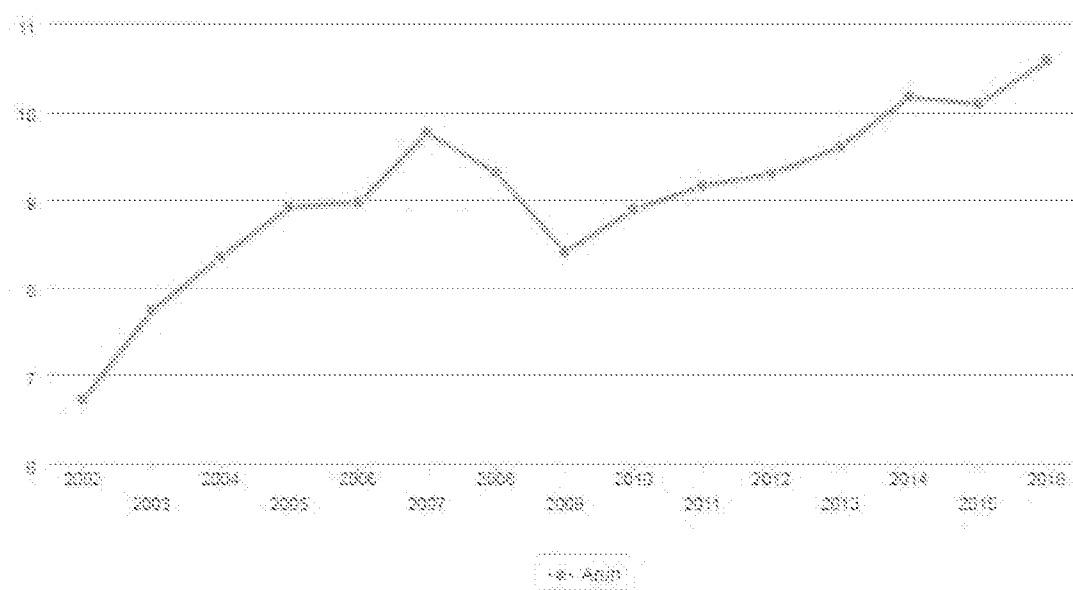
Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.

...That has to change. We need radical, lasting reform that will get more homes built right now and for many years to come. This White Paper explains how we will do just that."

- 2.2.10 This application therefore responds to the national housing crisis, but as will be explained later in this Planning Statement, the local housing issues in Arun, which are contributing to the problem overall.

2.3 The Local Authority Position

- 2.3.1 One effect of the national housing crisis is a profound effect on affordability. The following information, based on DCLG Live tables, demonstrates that the Council is failing to deliver the amount of homes each year that it needs. This has led to the increasing unaffordability of housing in the District since 2002.



Year	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Earnings Ratio	6.73	7.74	8.35	8.92	8.97	9.76	9.31	8.41	8.89	9.16	9.30	9.60	10.17	10.09	10.58

- 2.3.2 Mortgage lenders typically offer loan to income ratios from 3.25 annual salary up to a cap at around 4.5 times annual salary. More often than not this requires a deposit and loan to value (LTV) ratio of 95%. As can be seen from the data, house prices reduced during the recession. Since then, house prices to lower quartile earnings have increased beyond even those of the peak of 2007. The reality for those most in need in Arun now is that they are unable to afford to buy their own homes.

3 THE PLANNING APPLICATION

3.1 The Proposal

3.1.1 The drawings submitted as part of this outline planning application for approval are:

- Site location plan (drawing number: CSA/3467/108)
- Proposed site primary access layout (drawing number: 2020-F01)
- Proposed site secondary access layout (drawing number: 2020-F03)

3.1.2 The application proposal includes the following:

- Up to 200 residential dwellings (including 30% affordable housing delivered in accordance with planning policy);
- Structural landscape planting and the retention and positive management of key landscape features;
- 3.1 ha of formal and informal open space (34% of the gross site outline application area) including the provision of land for a full sized adult football pitch, new tree, thicket and meadow planting and recreational routes;
- Improved connectivity to the existing Public Right of Way adjacent to the site (PRoW No. 2176) and public access to land previously not available;
- New access arrangements including an informal footpath/cycle link; and
- A comprehensive surface water drainage scheme.

3.1.3 It is proposed that the site's main vehicular access will be from Arundel Road, within the northern area of the site via a simple priority junction with a refuge island. A secondary vehicular access point is also proposed to the south (along the current existing access) via a simple priority junction.

3.1.4 It has been confirmed that the required visibility splays can be achieved and that the site access junction will operate comfortably within capacity in both the morning and evening peak periods with the proposed development traffic.

3.1.5 The proposals involve the removal of various utilitarian structures currently in employment use on the site that currently project a poor outward appearance. However, this will be replaced with a high quality residential scheme.

3.1.6 A range of densities and house types are proposed to meet local need. Up to 30% of the units would be affordable, in order to meet local planning policy.

3.1.7 The illustrative Development Framework Plan for the site demonstrates how the built development will be set within a framework of open space and green infrastructure. The green space will include the provision of land for a full sized adult football pitch and informal open space (which meets both District and Parish aspirations). The proposal seeks to retain existing landscape features wherever possible, and the illustrative Development Framework Plan incorporates these elements within a strategic landscape framework.

3.2 Scope of the Application

3.2.1 The outline planning application is seeking approval in principle for the development proposals. Together, the description of development, DAS and other supporting documents describe the nature and content of the development proposed. Details of the parameters of the development for which outline planning permission is sought are included within the DAS, ensuring that an appropriate level of information is provided on the scale, nature and general arrangement of the development proposed at the outset.

3.2.2 The following documents have been submitted in support of the planning application:

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

3.2.3 The information contained within the application documents provide the framework for future detailed Reserved Matter planning applications.

4 THE DEVELOPMENT PLAN

4.1 Introduction

4.1.1 At the time of writing, the adopted Development Plan applicable to the site comprises:

- Saved policies of the Arun District Local Plan (2003); and
- The Angmering Neighbourhood Development Plan (2015).

4.1.2 The saved policies of the West Sussex Minerals Local Plan (2003) and the West Sussex Waste Local Plan (2014) do not contain any policies affecting the proposed development or site.

4.1.3 By virtue of development being located in the open countryside beyond existing built-up area boundaries, it is accepted that the proposed development is in conflict with certain policies of the adopted Development Plan. However, it is the case that material considerations exist to justify a departure from the Plan in this instance.

4.1.4 This section describes the adopted and emerging Development Plan for the site and considers the relevance and weight that should be attributed to the policies contained within it.

4.2 The Development Plan: Weighting

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

4.2.2 The Framework is a powerful material planning consideration but does not change the statutory status of the development plan as the starting point for decision making. Paragraphs 12 and 13 of the Framework confirm:

“Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.

The National Planning Policy Framework constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications.”

4.2.3 Further, in determining the weight to relevant policies the guidance at paragraph 215 of the Framework confirms:

“...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 the policies in the Framework, the greater the weight that may be given).”

4.2.4 The planning application should be considered in this context.

4.3 Five-year Housing Land Supply

4.3.1 The supply of available and deliverable sites for housing within the District is a material consideration in determining the weight to relevant policies for the supply of housing. Paragraph 49 of the Framework states:

“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”.

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

4.3.3 The Council accepts that they currently cannot demonstrate a five year housing land supply for development management purposes. Recent committee reports⁵ note that the current position is only around 2.07 years (as at 31/03/17) against the current OAN of 919 dpa.

4.3.4 As part of the ongoing Examination in Public (EiP) the Council have produced an update to Publication Plan and Housing Implementation Strategy (HIS) dated September 2017 which was submitted under document reference PELVP31. This document sets out the Council's supply position based on what the emerging Local Plan makes provision for and sets out a position of 5.3 years.

4.3.5 However, it must be noted that this position is over reliant on the delivery of emerging strategic sites and allocations, which account for over 50% of the total claimed supply position. This approach raises serious concerns over the overall deliverability of the Council's claimed supply as this position is yet to be fully tested at the EiP and a precautionary approach must be taken towards the delivery from these sites.

⁵ Such as AL/122/17/PL presented to the development control committee on 14th February 2018

- 4.3.6 Gladman note the recent Secretary of State appeal decision for the called-in application for land west of New Barn Lane, Bersted⁶, in which the Secretary of State concludes that the supply of housing is 2.07 years. The Decision Letter concludes at DL10-11:

“The Secretary of State has carefully considered the Inspector’s analysis at IR9.3-9.6. He notes the main parties’ agreement that there is a persistent undersupply of housing locally, that the 20% buffer should be applied, and that the assessed housing land supply is 2.07 years. Like the Inspector at IR9.4, the Secretary of State concludes that the supply of housing is 2.07 years.

He agrees with the Inspector that the current Development Plan, including the BNDP, is constraining development and not meeting local housing need or the Framework’s advice to significantly boost the supply of housing. Like the Inspector at IR9.48, he considers that development will need to be built outside these boundaries and in the open countryside if the housing supply situation is to be improved. Such policies are therefore out of date and can only be given limited weight.”

- 4.3.7 ADC’s housing land supply was also considered in the appeal decision for Land to the south of Ford Lane / east of North End Road, Yapton⁷, where it is noted at IR9 that:

“It is further recognised that there is an inability to demonstrate a five-year housing land supply, as required by paragraph 47 of the Framework, and that there is a serious shortfall. As such, policies for the supply of housing in the ADLP and the YNP are agreed to be out-of-date, and the ‘tilted balance’ in Framework paragraph 14 applies. It is also agreed that other relevant policies of the ADLP are out-of-date. In accordance with the Framework, the presumption should be one of granting planning permission unless the impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the Framework taken as a whole.”

- 4.3.8 Consequently, it is not considered the Council can presently demonstrate a deliverable 5 year supply of housing sites. Accordingly, relevant policies for the supply of housing are out of date in accordance with paragraph 49 of the Framework; and, policies that restrict the supply of housing should not be applied with full rigour.
- 4.3.9 The market and affordable homes proposed on the application site could start to contribute within the next five years of the plan period, therefore helping to address the immediate lack of a five-year supply of deliverable housing sites.

⁶ APP/C3810/V/17/3166900 (Decision date: 12th February 2018).

⁷ APP/C3810/W/17/3170059 (Decision date 15th January 2018)

4.4 The Arun District Local Plan 2003

- 4.4.1 The Arun District Local Plan was adopted in April 2003 to guide development in the District from 1996 until 2011. It is therefore 'time-expired' by some six years.
- 4.4.2 The application site is not allocated within the Local Plan and, although adjacent to the defined built-up area boundary for Angmering, the site lies within open countryside as shown on the proposals map.
- 4.4.3 Saved policy GEN2 of the Local Plan states that development or redevelopment will not be permitted outside the built-up area boundaries, unless it is consistent with other Local Plan policies. The application proposal, which is for a large scale residential development that would form an extension to the built-up area beyond the defined boundaries is therefore, in principle, contrary to GEN2.
- 4.4.4 However, the housing requirement set out at Policy GEN5 of the Plan was not based on a Full Objective Assessment of Housing Needs (FOAN) as required by paragraph 47 of the Framework and it provides for housing needs from a previous era, derived from the now expired West Sussex County Structure Plan. This is inconsistent with paragraph 157 of the Framework which states:

"Crucially, Local Plans should...

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework ;**
- ...and be kept up to date."**

- 4.4.5 A very different plan strategy is now required in order to meet current needs in accordance with paragraph 47 of the Framework.
- 4.4.6 Therefore, and irrespective of the adverse housing land supply position, the housing requirement policy (Policy GEN5) of the Local Plan is out of date and it can only be accorded limited weight.
- 4.4.7 Settlement boundaries in the Plan were tightly drawn to accommodate development to 2011 only and it was never envisaged that those boundaries would be used to inform development control decisions in 2018. The unintended consequence is the protection of countryside policy and built-up area boundaries of the Local Plan are restrictive of development that could otherwise come forward to help address pressing housing needs.
- 4.4.8 Settlement boundaries must inevitably change in order to accommodate objectively assessed needs and sustainable development. Indeed, the Council have accepted this in principle through a commitment to review the built-up area boundaries and allocate greenfield sites for development as part of the emerging Plan. Land outside of current limits is also being released by the Council and Inspectors through the development management process. For these reasons, the built-up area boundaries should be accorded limited weight in the determination of this application, the location

of the site in the open countryside immediately adjacent to existing residential development cannot therefore be a reason in principle for resisting development.

- 4.4.9 Relevant policies of the adopted Local Plan do not provide for the key Framework objectives of ensuring choice and competition in the market for land and boosting significantly the supply of housing over the next 5 and 15 year periods (Framework paragraph 47).
- 4.4.10 Consequently, it is clear the Framework's 'tilted' presumption in favour of sustainable development applies to the application proposal. This is irrespective of the housing land supply situation (and the operation of Framework paragraph 49), which is a separate consideration.
- 4.4.11 Further, saved policy GEN3 states that "the countryside will be safeguarded for its own sake". It is not accepted that the introduction of housing per se must be detrimental to the character and appearance of land. The previous aim of national policy to "protect the countryside for its own sake" as per PPG7 and the later PPS7 has been omitted from national policy. The Framework (paragraph 17) instead has a requirement to 'recognise' the intrinsic character and beauty of the countryside and support the rural communities living within it. Therefore, policy GEN3 should only be accorded limited weight, irrespective of supply.
- 4.4.12 Inspector Julia Gregory provides her views into the weight to be attached to saved policies GEN2 and GEN3 in the Secretary of State appeal decision for land off Burndell Road, Yapton⁸, where it is stated at IR 70 that these policies should be given no more than very limited weight:

"LP policies GEN2 and GEN3 are out of date also in the sense that the LP does not plan for housing beyond 2011, it pre-dates the Framework and does not seek to establish an OAN. The built up boundaries on which GEN2 and GEN3 are based relied on development needs as they were understood in 2003; and the lack of a 5 year housing land supply means that the housing policies should not be considered up to date when paragraph 49 of the Framework is applied. LP policy GEN3 also seeks to protect the countryside for its own sake which is not consistent with the Framework. LP policies GEN2 and GEN3 should be given no more than very limited weight."

- 4.4.13 The appeal decision also notes at IR109 that the Council accepts that policies GEN2 and GEN3 do not accord with the Framework and are therefore out of date. The Secretary of State agrees at DL12 of the decision notice that GEN2 and GEN3 are out of date, and can only carry limited weight.
- 4.4.14 Saved policy GEN7 sets out a number of criteria relating to the form of new development which must be met in order for development to be permitted, including reducing the need to travel, particularly by private car. However, there has been a fundamental shift in national planning policy regarding accessibility and a deliberate omission of previous key policy statements relating to specifically reducing the need to travel and reducing use of the private car that were contained within PPS1. The Framework introduces a more flexible approach to assessing the location of

⁸ APP/C3810/V/16/3158261 (Decision date: 13th October 2017)

sustainable development and makes an intentional move away from assessments based solely on reducing the need to travel. For this reason, the weight to be attributed to this policy in the context of determining this application is reduced.

- 4.4.15 In terms of other saved policies within the Arun District Local Plan 2003 which are up to date with regard to national policy, it is considered that the proposals also accord to their provisions, as far as possible for an outline application.
- 4.4.16 Consequently, it is clear the Framework's presumption in favour of sustainable development applies to the application proposal.

4.5 The Angmering Neighbourhood Development Plan

- 4.5.1 The Angmering Neighbourhood Development Plan was made on 11th March 2015 and therefore forms part of the Development Plan. Policy HD1 of the Neighbourhood Plan also seeks to restrict development outside of the built-up area boundaries and that developments will be approved within the boundaries, subject to accordance with relevant policies.
- 4.5.2 However, the made Angmering Neighbourhood Development Plan pre-dates the recent updates to the District's objectively assessed housing needs (which as set out in the GL Hearn report dated September 2016 stands at 919 dpa) and the emerging Local Plan's revised housing target of 20,000 dwellings across the plan period of 2011-2031. This is a substantially higher requirement than the figure that the Neighbourhood Plan was based on. Paragraph 194 of the Framework states that Neighbourhood Plans must be in general conformity with the strategic needs and priorities of the wider local area and that they should not promote less development than set out in the Local Plan or undermine its strategic policies.
- 4.5.3 The provisions of the Neighbourhood plan are therefore out of date and a different strategy is required. Gladman note that Angmering Parish Council intend to review the Neighbourhood Plan to reflect the increased housing requirement.
- 4.5.4 Gavin Barwell's written ministerial statement on the 12th December 2016, has now been embedded into PPG Paragraph: 083 Reference ID: 41-083-20170810. The statement sets out how planning applications and appeals should be determined in circumstances where the local planning authority cannot demonstrate a 5-year supply of housing, but there is a Neighbourhood Plan in force where all of the following criteria apply:
- a. the written ministerial statement is less than 2 years old, or the Neighbourhood Plan been part of the development plan for 2 years or less;
 - b. the Neighbourhood Plan allocates sites for housing; and
 - c. the local planning authority can demonstrate a 3-year supply of deliverable housing sites against its 5 year housing requirement.

- 4.5.5 The written ministerial statement stated that in such circumstances, relevant policies for the supply of housing in the Neighbourhood Plan should not be deemed to be 'out-of-date' under paragraph 49 of the National Planning Policy Framework. The PPG goes on to identify that

'Paragraph 198 of the Framework states that where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted. In determining applications, decision-makers should take into account the impact of granting permission for an application that conflicts with a neighbourhood plan. Where the criteria in the written ministerial statement apply, decision makers should give significant weight to the neighbourhood plan notwithstanding the fact that the local planning authority cannot demonstrate a 5-year supply of deliverable housing sites.'

- 4.5.6 It is clear that all of the criteria in the ministerial statement do not apply. The third bullet point requires the District Council to demonstrate a deliverable supply of housing sites of at least 3 years. As identified in section 4.3 of this planning statement above, ADC are currently only able to demonstrate a deliverable supply of 1.9 years at best.
- 4.5.7 Given that the Angmering Neighbourhood Plan does not comply with all of the three criteria set out in the ministerial statement the relevant policies in relation the supply of housing in the Neighbourhood Plan are out of date and should be attributed limited weight.
- 4.5.8 Policy ER2 of the Neighbourhood Plan states that there is a general presumption against the loss of locations that provide employment within the Parish, either as a result of proposals for a change of use or for the redevelopment of existing premises or sites of employment for non-employment use. As set out within the following section below, Gladman considers that the release of low quality employment uses on this site is justified due to the over-provision of employment land within the District across the plan period, and the desperate need for housing land across Arun. It is also considered that the replacement of utilitarian structures with a high quality residential scheme will secure environmental improvements.

Summary

- 4.5.9 In the light of the above, it is clear that the development proposal accords with all parts of the Development Plan that are up to date.
- 4.5.10 Where a conflict arises, those policies are either out of date or should be accorded limited weight due to their conflict with the more up to date provisions of the Framework. As a result, the conflict with those policies should be accorded corresponding limited weight. A determination other than in accordance with the development plan is therefore justified and other material considerations including the Framework and the presumption in favour of sustainable development are relevant.

4.6 The Emerging Development Plan

- 4.6.1 Arun District Council is currently working on a new Local Plan to cover the period up to 2031. The Local Plan was originally submitted to the Secretary of State for independent examination in January 2015. However, there have been substantial delays to the progression of the examination following a formal suspension to allow the Council to undertake more work towards the District's objectively assessed needs.
- 4.6.2 The examining inspector concluded in February 2016 that the Council's OAN should be 845 dpa across the plan period. However, following from this the 2014-based subnational population projections were issued in May 2016 and GL Hearn produced a Housing update paper in September 2016 which establishes an OAN figure of 919 dpa. Emerging Policy H SP1 within the main modifications version of the plan establishes a housing requirement of 20,000 across the period 2011-2031 (equating to an average of 1,000 dpa).
- 4.6.3 Further hearing sessions took place into the examination of the emerging Local Plan between 19th and 28th September 2017 and following this, the Council has produced a series of Main Modifications to the Plan which were subject to public consultation between January and February 2018. The final inspector's report is expected to be published in April 2018.
- 4.6.4 'Annex 1: Implementation' of the Framework, provides guidance on the weight to be attributed to adopted and emerging plans following the publication of the Framework. It allows decision makers to give weight to existing and emerging development plan policies according to their degree of consistency with the framework and in regard to emerging policies, the stage of preparation and the extent of unresolved objection to it.
- 4.6.5 As matters currently stand, the emerging Local Plan has not been fully tested at examination, nor has it been adopted and there are a number of unresolved objections to the plan. As such, its policies should not be regarded as decisive in this case. At present, there are no certain timescales for when the emerging Plan could be found sound and adopted by the Council.
- 4.6.6 However, the emerging Arun District Local Plan and supporting evidence base provides an indication of Arun Council's current objectives for development, and have informed the proposals.
- 4.6.7 Importantly Angmering is recognised as a settlement capable of supporting further growth, with the spatial strategy directing additional residential growth to the settlement through emerging policy H SP2c which proposes to allocate 800 dwellings at Angmering North (site SD9) and 250 dwellings at Angmering South and East (site SD11). Significantly these new homes cannot be accommodated within the existing urban area, meaning that the majority of new residential development will have to take place on greenfield sites in the open countryside, requiring the settlement boundary to be reviewed.
- 4.6.8 The growth of sustainable settlements such as Angmering and changes to settlement boundaries is an inevitable consequence of meeting additional housing needs. There is nothing within planning policy or law that makes it wrong in principle to breach settlement boundaries to

accommodate sustainable development. As referenced in the ministerial foreword to the Framework; *“The purpose of planning is to help achieve sustainable development ... Development means growth.”*

- 4.6.9 Gladman note emerging policies EMP SP1 and EMP DM1 within the employment and enterprise chapter of the emerging Local Plan. Emerging policy EMP SP1 sets out a number of ways in which the Council seek to promote the sustainable growth of the District’s economy including the allocation of circa 75 ha of employment land to meet the future needs and aspirations of the District
- 4.6.10 Emerging policy EMP DM1 states that the Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy and that existing employment sites and premises will be protected where there remains a good prospect of employment use.
- 4.6.11 As noted above, as the emerging Local Plan has not yet been fully tested at examination and is not yet adopted by the Council emerging policies (such as EMP SP1 and EMP DM1) can only be attributed limited weight.
- 4.6.12 Both policies EMP SP1 and EMP DM1 seek to provide and safeguard the supply of employment land to meet the needs for Arun District across the plan period. Gladman consider, that based on the evidence set out below, that there is justification for the release of low quality employment uses on this site due to the over-provision of employment land within the District across the plan period, and the desperate need for housing land across Arun.

Employment Land Supply

- 4.6.13 The Arun Local Plan Economy and Enterprise Background Technical Paper (March 2017), which forms part of the emerging Local Plan evidence base (document reference PEPP9) provides the latest evidence into the supply and demand of employment land across the district over the plan period of 2011-2031, which can be summarised as follows:
- a) The demand for employment space across the District based on the labour supply arising from the provision of 1,000 homes per annum (as proposed within the Local Plan) indicates a requirement of a total provision of 63,495 sq.m of employment floorspace across the Plan period, which equates to approximately 14 ha of land (tables 2.3 and 2.4);
 - b) The demand for employment floorspace when based on past take-up (which results in a significantly higher requirement and represents a much more aspirational trajectory for the growth of the District) establishes a demand for 123,360 sq.m, or approximately 28.6 ha of employment floorspace (paragraph 2.16). Although the Council is not seeking to meet one specific growth scenario, the labour supply position would reflect a better balance between jobs and homes (paragraph 2.33);
 - c) There are outstanding planning permissions (under construction or not yet started) for 23,285 sq.m of employment floorspace across the District (not including permissions on

employment land allocations), including 2,265 sq.m of industrial floorspace within Angmering (table 3.1);

- d) The strategic employment allocations proposed within the Local Plan are expected to deliver 154,525 sq.m of employment floorspace across the Plan period (paragraph 3.12), with extant permissions on these sites equating to circa 75,550 sq.m (paragraph 3.6);
- e) Since the start of the Plan period, there has been a net completion of 16,425 sq.m of employment floorspace across Arun District (table 3.3);
- f) Overall, there is a total supply of employment floorspace of 194,235 sq.m across the Plan period (table 3.4), with approximately 60% (or 115,260 sq.m) of this either benefiting from planning consent or is already built out;
- g) Based on the above, there is a surplus of employment land in quantitative terms against the requirement arising from the labour supply from the provision of 1,000 homes per annum of over 130,000 sq.m and of over 70,000 sq.m when assessed against the more aspirational requirement based on past take-up (table 3.5).

4.6.14 Gladman note that within ADC's answers to Inspector's questions following interim findings (examination document reference ADCED89), it has confirmed that the employment allocation at Angmering should be reduced in size from 8.95 ha to 3 ha due to viability and to allow a minimum of 800 dwellings to be accommodated on this site. The Main Modifications consultation document for the emerging Local Plan (January 2018) confirms the reduction in this employment allocation to 3ha and states that employment on this site will need to be designed as part of the Strategic Housing Allocation SD9. Even if it is assumed that no employment land would come forward within the plan period from the proposed allocation at Angmering, and removing the 17,900 sq.m of employment land that was identified as the site's indicative capacity at the time the background technical paper was published, there would still be a significant surplus of employment land within the District across the Plan period of circa 112,840 sq.m when assessed against the labour supply from 1,000 homes per annum and circa 52,975 sq.m against the aspirational target based on past take up.

4.6.15 Based on the above, there is a significant surplus of employment land available for Arun District (and more locally) across the plan period, even against the Council's highly aspirational demand scenario based on past take-up. The release of low quality employment land, which supports low levels of employment such as that found on the site, as proposed would not undermine the supply of employment sites in the area or prejudice economic growth objectives.

5 SUSTAINABLE DEVELOPMENT: THE FRAMEWORK

5.1 The Presumption in Favour of Sustainable Development

- 5.1.1 At the heart of the Framework is the '*presumption in favour of sustainable development*', seen as the '*golden thread*' running through plan-making and decision-taking (paragraph 14). For decision-taking this means approving development where it accords with the development plan, or where the development plan is absent, silent or out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate development should be restricted.
- 5.1.2 The relevant technical reports that accompany this planning application demonstrate that there are no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposals. Further, the application site is not the subject of any of the designations cited within footnote 9 of the Framework and therefore the presumption in favour of sustainable development should not be disapplied.
- 5.1.3 This section describes how the development proposals meet the relevant objectives of the Framework.

5.2 Building a Strong and Competitive Economy

- 5.2.1 The Framework is clear that the government is committed to delivering sustainable economic growth and charges the planning system with the duty to, "operate to encourage and not act as an impediment to sustainable growth" (paragraph 19). Housing development is a key component of economic growth and this is fully recognised in Government policy and more recently the White Paper – Fixing our broken housing market (2017), which states on page 15:

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

- 5.2.2 The proposed development will result in the loss of a small area of land currently in low-grade employment uses. However, as noted within section 4.6 of this statement, there is a significant surplus of employment land available for Arun District and more locally and the release of low quality employment land, which supports low levels of employment such as that found on the site, as proposed would not undermine the supply of employment sites in the area or prejudice economic growth objectives.
- 5.2.3 Based on the above, there is a significant surplus of employment land available for Arun District (and more locally) across the plan period, even against the Council's highly aspirational demand scenario based on past take-up. The release of low quality employment land, which supports low levels of employment such as that found on the site, as proposed would not undermine the supply of employment sites in the area or prejudice economic growth objectives.

5.2.4 Through the development of the site a significant amount of investment will be made to the area in terms of the construction value of the project and associated spend during the construction period. The construction industry and house building in particular make an important contribution to both the local and national economy in terms of job creation. The accompanying Socio-Economic Report estimates the following key benefits arising from the proposal:

- Construction spend - £21.9 million
- GVA over the build period - £7.3 million
- Resident annual expenditure - £6.9 million
- Council tax - £3.1 million
- New Homes Bonus - £1.6 million

5.2.5 The provision of quality housing in Angmering is central to the achievement of sustainable economic growth in Arun District and is fully supported by the requirements and advice of the Framework; indeed, paragraph 19 is clear that, *"significant weight should be placed on the need to support economic growth through the planning system"*.

5.3 Promoting Sustainable Transport

5.3.1 At paragraph 29, the Framework requires :

"...The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel."

5.3.2 At paragraph 30, it directs local planning authorities to:

"...support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."

5.3.3 Angmering has a number of services and facilities which are within easy walking and cycling distance of the site, including: Primary school, Secondary School, village hall, community centre, medical centre, pharmacy, library, churches, recreation grounds and a number of shops, public houses, takeaways and restaurants.

5.3.4 The closest bus stops to the development site are located to the south of the site with an approximate walking distance of 600m from the centre of the site consisting of a shelter, a bus stop pole with a bus timetable, with these stops providing services to Shoreham-by-Sea, Worthing, Arundel, East Preston, Lancing, Littlehampton and the services and facilities within the centre of Angmering with services operating from around 8.00am to 6.00pm, making travel by public transport a real alternative to travelling by car for commuting trips.

5.3.5 The Site lies within 10 minutes' cycle (1.5 miles) of Angmering train station, which can also be accessed via a 9 minute bus journey. Angmering train station provides frequent trains to Brighton, Portsmouth Harbour, Littlehampton, Southampton Central and London Victoria.

- 5.3.6 The nearby major employment centres of Worthing and Littlehampton are found within 8.5km and 4.5km from the site respectively and offer a wide range of employment opportunities beyond that which is found within Angmering itself. These can be reached on the number 9 bus service and by train from Angmering train station.
- 5.3.7 Angmering therefore has good public transport links to the surrounding areas and local centres of employment, with a range of employment, leisure, retail and community facilities.
- 5.3.8 In accordance with paragraph 32 of the Framework a Transport Assessment (TA) has been undertaken which confirms that the site is well located in relation to sustainable transport options and is well positioned in relation to the local and strategic highway network.
- 5.3.9 It is proposed that the site's main vehicular access will be from Arundel Road, within the northern area of the site via a simple priority junction with a refuge island. A secondary vehicular access point is also proposed to the south (along the current existing access) via a simple priority junction.

5.4 Delivering a Wide Choice of High Quality Homes

The Need for Market and Affordable Housing

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

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

Today the average house costs almost eight times average earnings – an all-time record. As a result it is difficult to get on the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000."

- 5.4.2 In addition to a pressing need for new market homes in Arun District, there is a significant need for affordable housing, as outlined within the as outlined within the OAN report published by GL Hearn for ADC (the latest version of the report which assesses the need for affordable housing), which suggests a need for 480 affordable homes per year within the District across the plan period.
- 5.4.3 The Council produced an update to the OAN report as part of the ongoing EiP (GL Hearn, September 2016) which identified the need in Arun District equated to 18,380 over the plan period (i.e. 919 dwellings per annum).
- 5.4.4 The scale of affordable housing need in the District is leading to a chronic shortage of much needed new homes.

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

5.4.6 As Inspector Julia Gregory concludes with regard to market and affordable housing need, in the appeal decision for land off Burndell Road, Yapton⁹ at IR202:

“...the development would provide some 108 dwellings of which 30% would be affordable, in a District where the housing shortage is severe. It would help significantly the supply of housing, including affordable housing... These are substantial benefits”

5.4.7 Gladman also note the findings of the Secretary of State with regard to provision of affordable housing in the recent appeal decision for land to the west of New Barn Lane, Bersted¹⁰, where the provision of affordable housing is given significant weight in the planning balance (DL21).

Ensuring Choice in the Competition for Land

5.4.8 The Framework sets out the Government’s key housing objective, which is, *“to boost significantly the supply of housing”*. Paragraph 47 sets out how LPAs should achieve this boost in the supply of housing, including a requirement to provide a delivery buffer of 5% or 20% to ensure choice and competition in the market for land.

5.4.9 The proposals entirely accord with this national policy objective in so far as the application will deliver new housing development which will assist the Council to contribute towards the central government objective of boosting significantly the supply of housing now.

5.5 Requiring Good Design

5.5.1 The DAS demonstrates how the scheme will deliver a high quality residential sustainable development. The proposals are based on sound design principles that have taken into account site constraints and opportunities presented by the site.

5.5.2 Whilst design is a matter reserved for future determination, the DAS demonstrates the site could accommodate a scheme that would be in scale and character with its surroundings and Angmering through delivering dwellings of a suitable size and through utilising materials that reflect the local vernacular. It is demonstrated through the DAS and TA that the site would be accessible to people on foot, cycle and to those with disabilities. The illustrative master plan seeks to create an attractive place that responds to the attributes of the site and the local context.

⁹ APP/C3810/V/16/3158261 (Decision date: 13th October 2017)

¹⁰ APP/C3810/V/17/3166900 (Decision date: 12th February 2018)

- 5.5.3 The proposals involves the removal of various utilitarian structures currently in employment use on the site that currently project a poor outward appearance. This will be replaced with a high quality residential scheme and areas of public open space, including the provision of land for a full sized adult football pitch.
- 5.5.4 The development has been designed taking into account the recommendations of the Landscape and Visual Impact Assessment (LVIA). The green infrastructure within the built development will sit as an integral part of the framework and is key in creating an accessible, open and engaging place within which to live. The proposal provides a strong green framework comprising;
- The creation of a 3.1Ha of Green Infrastructure comprising a variety of potential habitats, new tree, thicket and meadow planting;
 - Provision of open space to the throughout the site, with land for a full sized adult football pitch provided, which will form a focal point to the proposed development;
 - Reinforcement of existing hedgerows around the site boundary to improve the quality and connectivity of habitat;

5.6 Promoting Health Communities

- 5.6.1 Paragraph 70 of the Framework promotes the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments and paragraph 73 states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- 5.6.2 The proposed development includes the provision of land for a full sized adult football pitch compliant with FA guidelines, which will form a focal point to the development and help to promote a healthy and active lifestyle for new and existing residents.

5.7 Conserving and Enhancing the Natural Environment

- 5.7.1 Although the majority of the site is found on greenfield land the proposed development will result in the re-use of some previously developed 'brownfield' land
- 5.7.2 The site is not subject to any landscape quality designation and lies outside of the South Downs National Park. The site, nor the immediate landscape, contains any rare or unusual landscape features and Gladman considers the site does not comprise a valued landscape.
- 5.7.3 Development will result in a permanent change to the character of the application site however the proposals will aim to retain notable existing landscape features where evident such as boundary hedgerows and mature hedgerow trees. The Development Framework Plan illustrates how the proposals can be sensitively accommodated within the site. The creation of public open space around the perimeter, strengthening existing boundary vegetation and providing new links with surrounding public rights of way and public open space will all help to integrate the development into the fabric of the existing settlement and within the wider landscape. As demonstrated within

the LVIA, it is considered that the site can accommodate residential development in line with the proposals without giving rise to material landscape, townscape or visual effects.

- 5.7.4 The Ecological Impact Assessment prepared by CSA confirms that in the absence of any mitigation measures, the proposed development is anticipated to result in, at most, adverse effects significant at the local level. However, with the implementation of some straightforward mitigation measures as proposed with this scheme, the development is not anticipated to result in any residual significant adverse effects to important ecological features. The development will deliver net benefits for wildlife in the form of additional habitats, with the opportunity to provide additional biodiversity enhancement measures alongside the new housing.

5.8 Conserving and Enhancing the Historic environment

- 5.8.1 Section 12 of the Framework provides policy guidance on the conservation and investigation of heritage assets. The heritage desk-based assessment produced by Pegasus group concludes that although recorded remains within the vicinity of the site suggest archaeological potential, there is currently no evidence to suggest remains of a significance that would preclude the development.
- 5.8.2 The heritage desk-based report also confirms that on the basis of only a very weak historic functional link and lack of intervisibility between the site and the Grade II* Listed building Newplace Farmhouse, residential development within the site is not anticipated to harm the heritage significance of the farmhouse through changes to setting. The report also confirms that the proposed development is not anticipated to harm the heritage significance of the Angmering Conservation Area through changes to setting due to lack of intervisibility.

5.9 Meeting the Challenge of Climate Change

- 5.9.1 Paragraph 95 of the Framework seeks, “new development in locations and ways which reduce greenhouse gas emissions”, and urges LPAs to adopt national standards in order to drive for the delivery of sustainable development. The application proposal meets these criteria as it will be delivered to the relevant Building Regulations or equivalent standard applicable at the time of permission

5.10 Summary

- 5.10.1 From the above, it is clear that the application proposal complies with relevant provisions of the Framework. Accordingly, it can reasonably be concluded that the proposal is also in compliance with the broad Core Planning Principles of the Framework, expressed at paragraph 17.
- 5.10.2 The assessment against the relevant policies does not indicate any circumstances under which permission should be restricted which might result in the disapplication of the presumption in favour of sustainable development.

6 PLANNING BALANCE AND CONCLUSIONS

6.1 Summary of Case and Identified Benefits and Harm

- 6.1.1 The outline planning application is made in the context of the government's requirement to boost housing land supply, the presumption in favour of sustainable development and the out of date Arun District Local Plan. Given that the Development Plan is out of date, the positive determination of the application in accordance with the Framework paragraph 14 is not reliant on the absence of a five year housing land supply. Nevertheless, the proposal does respond positively to the identified lack of a five-year housing land supply in Arun and the identified needs for both market and affordable housing in the District.
- 6.1.2 This proposal would be deliverable in the short term and increase the supply and choice of housing at one of the identified settlements in the District. It would contribute towards economic growth and have wider social benefits to the local community, meeting a range of housing requirements, including affordable housing. The principles outlined within the DAS would secure a high quality scheme.
- 6.1.3 The supporting material, assessments and reports demonstrate that there are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations. Gladman is willing to enter into constructive dialogue with the Council to agree a list of conditions and S106 Heads of Terms that are necessary to make the development acceptable in planning terms. In order to commence this process, a list of suggested Heads of Terms for a s.106 Agreement is enclosed at Appendix 1.
- 6.1.4 As with any edge of settlement site, the development will introduce changes to the area and some urbanising effects. Care has been taken to ensure that the perceived impact on Angmering is minimised and acceptable, through careful design and siting, the provision of extensive open space along the boundaries of the site and through taking a holistic approach to landscape provision at the site.
- 6.1.5 The development of the site, as proposed, would be both suitable and sustainable, and there is justification to grant planning permission in accordance with the presumption in favour of sustainable development.
- 6.1.6 The development of the land in the open countryside outside of the current adopted settlement boundary would be contrary to the Development Plan. However, Section 38(6) of the 2004 Act provides for a determination other than in accordance with a development plan if material considerations indicate it is appropriate.
- 6.1.7 The relevant material considerations in this case are:
- The Local Plan is time-expired and its housing policies and counterpart settlement boundaries were not designed to meet development needs beyond 2011;

- Saved Local Plan policies for the supply of housing are also out-of-date given the Council's failure to provide a robust deliverable five-year supply of housing land and its historic under performance in respect of the delivery of housing;
- Under the current Local Plan, the site lies in the open countryside adjoining the settlement boundary of Angmering. If the settlement boundary of Angmering were to remain intact or no open countryside was developed, insufficient land would be available to meet the objectively assessed needs of Arun District (i.e. those policies are restrictive of development);
- The application is submitted in advance of the adoption of the Council's new Local Plan, but this is yet to go through examination and is the subject of unresolved objections. Weight cannot therefore be attached to its emerging provisions;
- The site is suitable for residential development in terms of location and characteristics and it is not of high environmental value;
- The landscape features of the site will be retained and reinforced to retain a suitable landscape edge and setting; and
- The provision of affordable housing, without subsidy, is a significant benefit in circumstances where the Council is not delivering sufficient affordable homes to meet pressing needs.

6.2 Benefits

6.2.1 The table below highlights some of the key benefits arising in respect of the application proposal:

Market Housing	• It will help to deliver much needed new, quality, family homes, in a community where people wish to live, in a suitable and sustainable location close to existing public transport, shops, employment opportunities and community services.
Affordable Housing	• It will provide a wide range of homes including a policy-compliant provision of affordable housing (30% or up to 60 units).
Jobs and the Economy	Immediate Impacts • The build cost for the development is expected to be around £21.9m. Calculations suggest that this construction expenditure would support around 188 Full Time Equivalent (FTE) construction jobs per annum over the period of the build. • The development of new homes in the proposed development could help to address local unemployment in the industry, and provide apprenticeship and training opportunities for young unemployed people. • Over the six years following the completion of the development, Arun District Council will benefit from circa £1.6 million via the New Homes Bonus.

	Lasting Impacts • It is anticipated that 194 of residents from the new development will of working age (those in work or actively seeking work). • Household expenditure from the 200 new homes would be circa £6.9 million per year in Arun District. • The scheme will supply new affordable rented and intermediate housing, helping to address substantial local affordable housing needs by providing opportunities for lower income households to own their own home or to secure rented accommodation.
Protecting and enhancing Vitality and Viability	• The new residents will increase demand for and use of local services and businesses and increased spending will help to protect, maintain and enhance the services available and accessible within the town and surrounding area.
Public Open Space and Recreation	• It will provide formal and informal public open space and green infrastructure and secure its long-term management for use by the new and existing community. • The provision of land for a full sized adult football pitch on site will promote a healthy and active lifestyle for new and existing residents. • It will improve connectivity and access to public rights of way.
Environmental Benefits	• Biodiversity of the site will be protected, diversified and improved through new hedgerow and tree planting and delivery of new garden spaces and formal and informal green spaces. Overall, the proposal will achieve a net gain in biodiversity.

6.3 Harm

- 6.3.1 The supporting material, assessments and reports demonstrate that there are no unacceptable adverse impacts associated with the scheme.
- 6.3.2 As with any edge of settlement site, the development will introduce changes to the area and some urbanising effects and it will involve the loss of some agricultural land however, this is to be expected and the LVIA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts.
- 6.3.3 The proposed development will result in the loss of a small existing business area which consists of various utilitarian structures that currently project a poor outward appearance, to be replaced by a high quality residential development and public open space including the provision of land for a full sized adult football pitch. As noted within section 4.6 of this statement, there is a significant surplus of employment land available for Arun District and the release of low quality employment land, which supports low levels of employment such as that found on the site, as proposed would

not undermine the supply of employment sites in the area or prejudice economic growth objectives.

- 6.3.4 Despite these changes, significant and demonstrable harm will not arise through development overall as proposed.

6.4 Planning Balance and Conclusions

- 6.4.1 The Framework policies on the delivery of sustainable housing development carry significant weight, and the delivery of the proposed development would support housing and economic development objectives and meet the aims and objectives of sustainable development, securing net gains across all three strands of sustainable development (economic, social and environmental).
- 6.4.2 There are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal and specific policies of the Framework and Development Plan do not indicate that development should be restricted.
- 6.4.3 In accordance with paragraph 14 of the Framework, the development proposal clearly constitutes 'sustainable development'.
- 6.4.4 Accordingly, it is clear there are significant material considerations which outweigh the statutory presumption in favour of the Arun District Development Plan and the planning application should be approved.

APPENDIX 1: S.106 DRAFT HEADS OF TERMS

The following S.106 Heads of Terms are proposed as those obligations which, in accordance with the CIL Regulations (2010) are necessary, directly related to the development and fairly related in scale and kind to the development:

AFFORDABLE HOUSING

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

OPEN SPACE

- ii. The Agreement will require the Developer to provide onsite informal open space and a land for a full sized adult football pitch.
- iii. Appropriate phasing requirements will be specified together with the requirement to agree with the Council an appropriate scheme for the long term maintenance and management of these areas, including any off-site commuted sums as applicable.

OTHER

- i. Other contributions may be identified through the planning consultation process, and subject to meeting the appropriate tests of necessity and reasonableness, consideration will be given to their inclusion.