



Woolf Bond Planning
Chartered Town Planning Consultants

Your Ref: A/51/18/PL
Our Ref: DB/jmc/7848

5th June 2018

Planning Department
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Dear Sir/Madam

LAND AT POUND PLACE, ROUNDSTONE LANE, ANGMERING, BN16 4PP

I refer to the above planning application and understand Ross Leal is no longer the case officer. I would welcome confirmation of the new officer so that I can discuss any issues arising from the application to date. In the meantime, I note that consultees and third parties have made various points. Many of the points made are capable of being addressed through the imposition of appropriate planning conditions. My comments (which include comments made by the other consultants from Hallmark's team) on certain points raised are set out below. I would be grateful if you could take them into account as part of your consideration of the application.

Need for road safety audit

The County Highway Authority has commented that the outline permission has expired and that (presumably) the County Council needs to see a road safety audit and road safety audit response report looking at the site access from Roundstone Lane.

The outline permission for 18 dwellings was granted on 2 April 2015 (154/14/OUT), with a standard timing condition imposed, as follows:

“The development hereby permitted shall be begun either before the expiration of 5 years from the date of this permission, or before expiration of 2 years from the date of approval of the last of the reserved matters to be approved, whichever is the later.”

The outline permission has therefore not expired, as a matter of fact.

The appellant's Transport Consultant has spoken to Mr Bartle of West Sussex County Council and understands that the Highway Authority is unlikely to be objection to the proposals, albeit, as I understand the situation, Arun Council has yet to receive the formal response from the Highway Authority.

Parking provision

It has been suggested by third party consultees that the scheme proposes insufficient car parking, albeit this point has not been raised by the Highway Authority.

The Transport Statement forming part of the application set out the Council's adopted parking standards, which indicate a maximum level of 28 parking spaces for the proposed 71 bed care home. It is intended to provide 32 spaces including 2 for disabled users and this therefore slightly exceeds the maximum standard.

The Transport Consultant has reviewed survey data at existing care homes which is available on the independent TRICS database and that shows that for 30 care homes with more than 50 beds, the average level of provision is 0.47 spaces per resident with a range of between 0.14 and 2 spaces. It should be noted that all but two of the care homes have a parking provision of less than 0.7 spaces per bed.

The average maximum parking demand, ie the number of cars observed to be parked was 0.26 cars per bed, much lower than the levels of provision. The attached table shows this information, with the figures for the proposed care home information in bold.

The proposed care home at Roundstone Lane would have an average provision of 0.45 spaces, ie close to the average and which is equal or greater than provision at 23 of the 30 care homes. The expected demand for parking would be 19 cars based on the average and only 4 of the 30 care homes indicated a level of demand greater than the number of spaces proposed.

It is apparent, therefore, that based on information about these existing care homes, the level of parking provision is appropriate.

Ecology and trees

The response from the Ecology Advisor raises various issues, all of which should be capable of being addressed through appropriate planning conditions.

Under the heading 'Enhancements', it is suggested that 'Any trees removed should be replaced at a ratio of 2:1'-it is not clear whether this means for every two trees removed there should be one planted, or for every single tree removed, two trees planted.

Replacing trees on a 2-1 basis is not practical in arboricultural terms. The site is not large enough to accommodate so many trees where they would have the space to flourish and be sustainable for long term retention.

The Ecology Consultant acting for the applicant has identified that there is scope to provide replacement trees to compensate for the loss of the boundary conifers. The replacements would be with species more suitable for the site to offer, screening, softening to the building and seasonal interest, in addition to wildlife benefits.

As far as habitats for bird nest is concerned, conifer species only tend to be occupied by pigeons, other birds tend to find more native species to nest in because of the tight cover, food source etc. Conifer species offer less wildlife habitat compared to other, native species that are proposed to replace the conifers. The

ecological comments do not seem to flag the nesting potential of the trees as a high priority, because of this reason.

In general terms, as related to both ecological interests and other interests, the existing trees have limited safe useful life expectancies, even if the development was not a consideration. The development provides a means to ensure suitable replacement screening is provided to a good standard and of benefit to ecological interests.

Issues have been raised by third parties about removal of boundary trees.

It is accepted that the boundary trees have prominence and this is why the Council has made a TPO. However, the proposal includes replanting with trees which are more suitable for long term retention, that would provide better amenity and ecological benefits, long term.

The application notes that the trees are in a healthy condition with no pests or diseases observed, but the supporting tree reports note that a great number of them have structural issues, which could have impacts in terms of limb or tree failure on adjoining properties and the public highway. In this context, the fact that a tree is not declining in health should not automatically mean it is suitable for long-term retention.

Overdevelopment

The Parish Council has suggested that the proposal is an over-development of the site. The Planning Statement, together with other statements submitted with the application explains why the scheme is entirely appropriate for the site, such that it does not represent over-development.

The attached document shows the beds/acre and built areas/acre ratios of various Care Home Developments built by the applicant or under construction. This proposal is also included and the document illustrates that compared to other Hallmark developments, both the bed and built density per acre proposed is amongst the lowest.

Drainage

Reference has been made for the need for the development to be properly drained. The application is supported by a Design Strategy Report which addresses this matter and as necessary, appropriate conditions could be imposed to require further submissions.

Viability

It is assumed that the Council will be instructing a surveyor to review the Viability Assessment submitted in support of the application. Can this be confirmed? Once this has been done the two consultants can hopefully discuss and agree matters.

Doctors Surgery

In respect of potential impact on the local doctors surgery research carried out by Aston University confirms that proposals such as these actually have a net benefit on local GP services owing to the fact that the residents within the scheme are being cared for thereby resulting in less need to call upon the services of the local GP.

From 2012 to 2015 the Extra Care Charitable Trust commissioned Aston University to undertake a study looking at the benefits for older people of living in a retirement village setting which is identical to the proposals here. It highlighted for the first time, the benefits of allowing older people to remain independent, while living in a retirement community with onsite support services and strong links into the wider neighbourhood.

Key findings of the research included:

- * Residents experienced a significant reduction in the duration of unplanned hospital stays from 8 to 14 days, to 1 to 2 days.
- * Routine GP appointments for residents fell 46% after a year.
- * NHS costs for residents were cut by 38% over 12 months compared with their costs when they first moved in.

Accordingly there is evidence that the proposed development, taking into account the nature of care provided, will reduce pressures on existing local healthcare facilities such that no improvements will be required to existing healthcare as a result of this planning application.

Secondly, many of the residents will already be local and therefore not be additions to the area or the GP surgery.

Thirdly, the development will only be occupied in a phased manor over a given period of time and will not therefore result in a sudden influx of new elderly people to the area.

I hope the above provides sufficient comfort as well as response to this particular matter.

I would be grateful if this letter could be taken into account as part of the consideration of the application. Please do not hesitate to telephone or e mail me at

[Redacted contact information]

Yours faithfully

[Redacted signature]

Douglas Bond BA (Hons) MRTPI

cc Client