



Ms Amy Myer
Development Control
Arun District Council
Civic Centre
Maltravers road
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BN17 5LF

20 March 2020

Dear Amy

Outline Planning Application for development of 70 bed Care Home and 14 Assisted Living bungalows with associated car parking, landscaping and access at Land Adjacent to Highfield House Yapton Road Barnham PO22 0AZ, ADC Ref BN/128/19/OUT

We write to you further to our recent correspondence, most notably your emails of 19/02/20 and 11/03/20. You set out a number of matters which you requested further information on and we therefore comment as follows.

Alternative Sites

Enclosed with this letter is a full Review of Alternative Sites. The Review considers 12 sites within a 2.5 mile radius of the application site, and follows the principles established in the recent appeal on land to the rear of Bairds Farm Shop (PINS ref APP/C3810/W/19/3227374).

The Review finds that there are no other suitable or available alternative sites within the search area which could accommodate the scheme proposals, and thus demonstrates the suitability and appropriateness of the application site.

National Design Guide

You have requested that we address policy in the Design Guide particularly paragraphs 23-31 and the Good Design Character Criteria in Part 2.

The National Design Guide forms part of the Government's collection of planning practice guidance and seeks to help create new places which are well-designed and well-built places that benefit people and communities. In particular, reference is made to people at all stages of life, including, older people, both able-bodied and disabled.

The application is in outline form only, with all matters reserved for subsequent approval except means of access. Notwithstanding this, the application is accompanied by an illustrative Masterplan which shows a proposed form of



development for the site. Importantly, this Masterplan demonstrates how development can come forward in a high quality way having regard to the guidance contained in the National Design Guide. Turning to each matter:

Layout: the site has been set out with a logical arrangement for the different uses. The care home is shown on the western part of the site, orientated to prevent overlooking and overshadowing, but allowing for good views of open space and amenity areas. It sits within a generous amount of amenity space which lends to a more 'open feel', as opposed to one in a more urban context. There is then a central area for parking and vehicle movements, but that is broken up with a central green space feature. The area is intentionally kept wide and open to again retain the 'open' feel of the layout as opposed to a denser urban location.

The assisted living units have been predominantly arranged in groups of 4 dwellings, retaining large gaps between clusters. Footpaths are shown around all sides of each group, which encourage walking and interaction between residents and visitors, along with a connection to the public right of way which runs to the east of the site.

Form and Scale: the illustrative design for the Care Home shows a 2 storey building with a central atrium and four 'wings' to the building. This design keeps the bulk and massing down by restricting heights to 2 storeys, whilst also creating a separation and avoiding one large contiguous line of development. The proposed assisted living units have been shown as bungalows which is in direct response to feedback received from the public consultation carried out in advance of the application submission. As set out above, the shape and separation of the units with associated open space and paths encourages a relaxed feeling of openness.

Appearance and Landscaping: a key component of the design approach to the site was to create one which sits within a spacious, attractively landscaped setting. The illustrative masterplan shows generous areas of green space, whilst there is significant new landscaping proposed. The site is presently a grazed field with hedgerows along the boundaries; the proposal would introduce new water bodies in the form of attenuation basins, significant tree planting and new shrubs and hedgerows. Hard landscaped areas are shown as permeable paving rather than 'hard' concrete and similar surfaces.

Materials and Detailing: the application does not include specific details of materials or detailing, and this would form part of a subsequent reserved matters application. The design and appearance shown could comfortably include materials which respect the local vernacular, with particular focus on detailed parts of the buildings such as eaves, guttering, door and window surrounds etc.

The National Design Guide includes in Part 2 ten characteristics of good design, as follows:

- Context – enhances the surroundings;



- Identity – attractive and distinctive;
- Built form – a coherent pattern of development;
- Movement – accessible and easy to move around;
- Nature – enhanced and optimised;
- Public spaces – safe, social and inclusive;
- Uses – mixed and integrated;
- Homes and buildings – functional, healthy and sustainable;
- Resources – efficient and resilient;
- Lifespan – made to last.

Given the fact this is an outline application, much of the consideration against these characteristics will be reserved for subsequent consideration at a later stage. However, in respect of each matter:

Context: the scheme proposals respond to the site context, with significant new landscaping and high quality designed buildings which would enhance the surroundings. It respects the location, being in a sustainable location (as set out in the Planning Statement) and has due regard to nearby buildings, including heritage assets.

Identity: the proposals have a distinct identity which respects the surrounding built form, but creates its own identity through the use of features such as mono pitch roofs.

Built form: the proposed development is in a coherent fashion with a logical and legible form that is safe and easy for residents and visitors to find their way around.

Movement: the site is accessible from both vehicular and non-vehicular means, and the proposals would enhance the area through delivering improvements to the public footpath on the site frontage. The site itself has an open layout with new paths and routes shown which are easy to access, whilst the relatively flat topography of the site and surrounds adds to this accessibility.

Nature: the proposals would deliver a net gain in Biodiversity as set out in the accompanying ecological report. New planting and attenuation basins would enhance the site and improve the ecological potential when considered against the existing land cover.

Public Spaces: the site would not include any public rights of way, but due to the nature of the proposals, would likely receive visitors of residents living within the care home and properties. The layout allows for generous public areas wherein residents and visitors can walk, sit and interact in a safe and inclusive fashion.

Uses: The proposals incorporate a mix of uses with a care home and assisted living properties. These suit people at different stages of life and with different needs and could allow for residents to change tenures and stay in the same location, as their needs change.



Homes and Buildings: The proposed buildings would be functional and accessible and incorporate good quality internal and external environments. The large areas of open space and walking routes around the site would promote health and well-being, enhanced by the proposed landscaping.

Resources: The accompanying Planning Statement sets out how the proposals incorporate a range of renewable energy and sustainability measures. The scheme shows solar panels; electric vehicle and buggy charging points; sedum roofs; and rainwater gardens.

Lifespan: The proposals are designed to allow for users and the care home provider to be able to be well managed and maintained. The open space areas could include items such as community garden/orchard etc which would encourage a sense of pride and ownership from residents and ensure that the land is well managed. The design of buildings allows for adaptation in the future as needed, with the large space around the buildings and parking area meaning the site is not heavily constrained as technologies change – e.g. changing methods of transport.

The above information demonstrates that the proposed development is consistent with the planning principles in the Design Guide as well the Planning Practice Guidance and principles in the National Planning Policy Framework (NPPF) as already explained in the main Planning Design & Access Statement.

Ecology

Enclosed with this letter is an update to the Ecological report which accompanied the application, along with covering letter. This update responds to the comments by the Council's ecologist and demonstrates that the site can deliver the mitigation and enhancement matters requested by the Council's ecologist in their response. In particular it shows how the site will deliver a net gain in Biodiversity, as required. We trust that this addresses their comments and allows them to now support the application.

Trees

Enclosed with this letter is a completed Arboricultural Survey, Impact Assessment and Tree Protection Method Statement for the site. This shows that the development would not result in any harmful impacts upon existing trees and. It addresses the request from the Council's Tree Officer and would allow for them to also support the application.

Highways

We are now in receipt of the Highways officer comments on the proposals. It is of note that they have not raised objection and have instead requested further information/modifications. We are liaising with the Officers to provide the information and clarification they have requested and therefore expect to be in a position where the Highways Officer can confirm that they have no objection to the proposals subject to conditions.



Affordable Housing

We note the Council's request for affordable housing in relation to the assisted living units. These units are not standard market housing, as seems to be suggested by the affordable housing officer.

Paragraph 64 (b) of the NPPF states that where development provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly), it should be exempt from the requirement to provide affordable housing.

In this instance the Assisted Living units are such a use, wherein they would be purpose-built accommodation for the elderly, with items such as buggy shelters demonstrating this fact. They should therefore be exempt from the requirement to provide affordable housing and could be conditioned to ensure that they are only occupied by elderly persons.

Other Matters

We note that the Council's Landscape officer has not raised any objection on landscape or visual impact grounds, concluding that: *"While the development lies outside the built-up boundary sufficient mitigation has been indicated at this stage to reduce its visual impact on nearby residents. It looks to have incorporated an acceptable quantity of greenspace within the site and the proposals also seek to enhance biodiversity."* They have not raised objection and have instead requested a landscape plan, which could be conditioned, and my client would be agreeable to such a condition.

As per our previous correspondence, recent appeal decisions have confirmed that there is a significant identified unmet need within this area, and, that the Council cannot currently demonstrate a 5 year housing land supply. The proposals also accord with Policy CLW1 of the Neighbourhood Plan, in that they are in keeping with the character of the location (as evidenced by the Landscape Officer comments) and the impact on the amenity of surrounding residents is acceptable.

All of these matters are afforded significant weight in the balance, and, given that no significant harm has been identified, we consider that the planning balance is therefore weighed heavily in favour of the proposed development. The Council, in accordance with National Planning Policy, should find in favour of the proposals and grant planning permission without delay.

If you require further information, then please contact me on the details at the head of this letter.

Yours faithfully

A solid black rectangular box used to redact the signature of Mark Schmull.

Mark Schmull

