

PLANNING STATEMENT

Proposed 64-Bed Dementia Care Centre

at

Land to the Rear of Bairds Farm Shop, Climping,
Littlehampton



BRACKLEY INVESTMENTS LTD

MAY 2018

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Executive Summary

Healthcare Management Trust, a not-for-profit charitable provider of older persons care, are seeking to invest over £10million into a new 64 bed Dementia Care Centre.

Arun district has a chronic shortage of housing land supply, and the proposal, as a C2 use, constitutes a form of housing development. Whilst it constitutes a single planning unit, the Council's Housing Strategy suggests that the freeing-up of market housing facilitated by the development could contribute toward housing land supply. Thus the development should be positively encouraged as a windfall solution.

The proposed development is in a sustainable location and has been sensitively planned so as to conform with the Strategic Gap policy AREA10. Given that Policies GEN 2 and GEN 3 concerning developing outside settlement boundaries are out of date, the proposed development is considered to be in accordance with the Development Plan, and thus Paragraph 14 of The Framework (a key Material Consideration) states that the development should be approved without delay.

However, even if the proposal were deemed not to fully comply with Policy AREA 10, the Weighted Balance of Paragraph 14 of The Framework is engaged. In this regard the proposal clearly offers substantial social, economic and environmental benefits which significantly and demonstrably outweighs any resultant harm rather than vice-versa. Furthermore, the Development Plan is silent on the need for C2 development, therefore again there is a presumption in favour of granting consent for sustainable development.

One of the problems any ageing population faces, is the prevalence of Dementia, in all its forms. Within Arun, the fastest increase in age profile is those aged 85 and above, where an increase of over 60% is predicted by 2020. The need for additional specialist care is independently supported by Carterwood (the sector's leading consultants) who confirm that even within the most local catchment area of 2.5 miles the need is for 138 beds.

The proposed location at Climping constitutes a sustainable one as it is within walking distance not only of bus routes but also a new cycle lane / footpath connecting the Climping area with local villages as well as the district's main towns.

The specific application site is set within the local context of commercial development in the form of the Baird's Farm Shop and other commercial and residential development.

The accompanying suite of supporting documents demonstrate that the physical and visual impact of the development will be minimal, given the extent of neighbouring development, coupled with the sensitive approach to development.

1 Introduction and Background

The application to which this statement relates seeks approval for the development of land to the rear of the Baird's Farm Shop at Crookthorn Lane, Climping, BN17 5SN.

Full planning permission is sought for the development of a 1.5 storey 64 bed dementia care facility together with access, parking and landscaping (Use Class C2).

The application is made by Brackley Investments Ltd – specialist developers of Older Persons Care Accommodation, on behalf of Healthcare Management Trust (HMT). Brackley have developed 8 care homes for a range of charitable trusts, the majority being specialist dementia care facilities, and HMT are an experienced CQC registered charity and not-for-profit provider of older persons care, with existing care facilities in West Wickham (Kent) and Romsey (Hampshire).

This development is urgently needed due to the increasing prevalence of dementia resulting from the ageing population, and the lack of modern 'market standard' supply of such specialist dementia care – approximately two thirds of care home residents have dementia but there are very few specialist facilities available for this growing need.

A dementia care centre such as the proposed is unique in that it provides for dementia in all its 100+ forms, through the full range of acuity, and therefore provides end of life care without the need for residents to move to alternative accommodation.

This report should be read in conjunction with the accompanying supporting documents which adhere to the validation requirements set-out in the pre-application response.

Submission of this full planning application follows a formal pre-application enquiry with Officers and a Public Consultation process including presentations to the Climping Parish Council and a Public Information Day, where the plans were very well received.

This report starts by describing the site and its surroundings together with a summary of the local development context, followed by a section highlighting how the design has changed and improved from the initial pre-application submission. A resume of the final development form is then provided before the development is assessed against the full national and local planning policy context.

Material Considerations are considered in full before the planning balance is applied and conclusions are drawn as to why the proposed development should be approved without delay as a sustainable form of development that is in accordance with the Development Plan.

2 Site Description and Evaluation

General location

The site is located to the south of Baird's Farm Shop, off Crookthorn Lane (A259) at Climping, near Littlehampton, West Sussex. It is situated within the Strategic Gap between Littlehampton and Middleton-on-Sea, amongst several other residential and commercial developments serving the villages of Yapton, Barnham, Bilsham, Middleton on Sea, Ford and Climping.

The south coast is approximately 1/2 mile to the south, and this part of Arun district is known to have a higher than average elderly population.

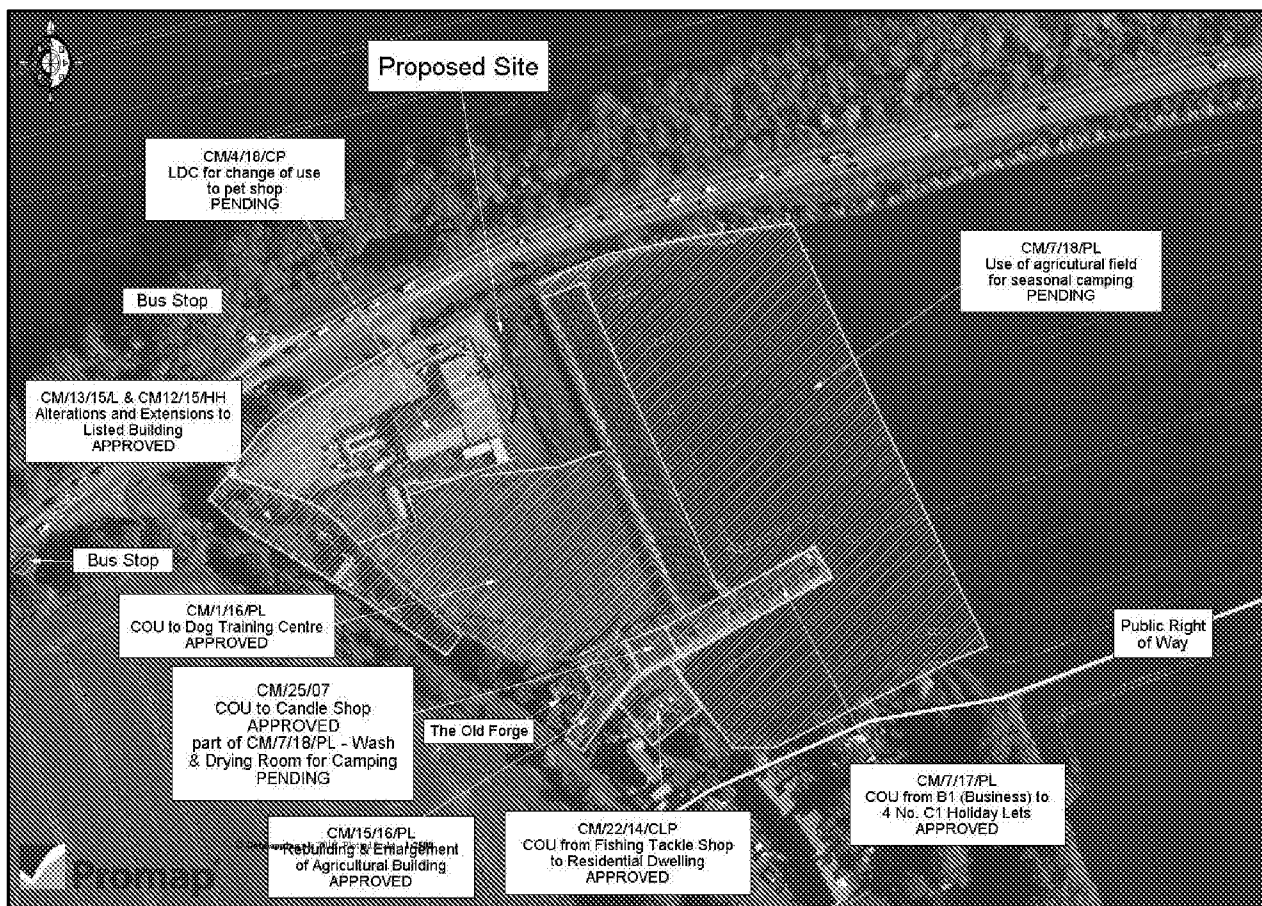
Climping (or Clymping as preferred by the Parish Council) is a small village interspersed by Crookthorn Lane with a good collection of local facilities including a Primary School, Village Hall and playing fields / cricket ground, St Mary's Parish Church, and two Public Houses (The Oystercatcher and The Black Horse Inn) as well as Baird's Farm Shop. One particular feature is the early 18th century Windmill.

Also situated within the parish is the Bailiffscourt Hotel and Spa at Atherington thus, along with several B&B's and other holiday accommodation, the Parish is well served for visitors.

The site is located at the centre of the Parish, near the junction of Climping Street with the A259 which has a new cycle path and footpath, therefore making the site within an accessible walking distance of several facilities including the two pubs, school, church and the village hall.

Setting

The application site is set amongst a collection of buildings, as illustrated by the context plan below.



To the north is Baird's Farm Shop and cafe, a large agricultural barn conversion with various outbuildings in the form of portacabins, external storage, sales and seating areas.

The Farm Shop houses a number of individual retail uses including a Plant Centre, Butchers, Delicatessen and Café, Antiques shop and ancillary goods and at the time of writing is subject to a current application to vary the range of goods sold to include Fish.

The Farm Shop has a ridge height of 6.05m and is of agricultural construction (green corrugated iron



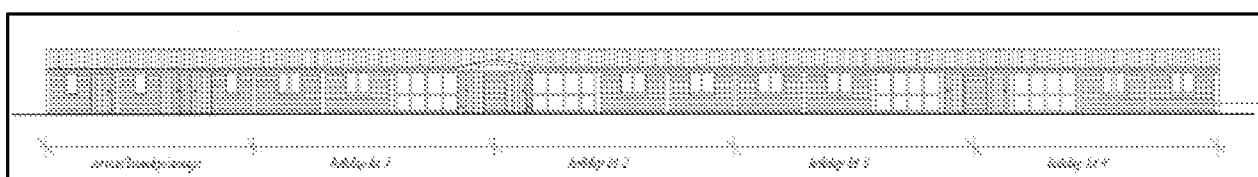
walls and roof). It is separated from the A259 Crookthorn Lane by a large tarmac car park, and its vehicular access benefits from a right-hand turn lane. To the north of the A259 a mature tree belt screens the site from views from the villages of Yapton and Ford to the north.

To the west of the site is the residential curtilage of 'The Cottage', a Grade 2 Listed building which has recently been extended. It is a detached, two storey, rendered building under a pitched roof with a ridge height of 7.7m. West of Climping Street is a mature treeline, thus making the site largely invisible from countryside to the west.

The field boundary between the site and the curtilage of the Cottage is to be retained, thus the mature tree cover will remain intact, as will the original village pond to the west.



To the south there are a collection of buildings including the former Forge, the former angling shop (which has now been converted to residential accommodation) and a further agricultural building which has been converted to a garage. To the south-east the former Old Piggery has planning permission to be converted to holiday accommodation (CM/7/17/PL) which has now been partially implemented (see image below).



Further to the south are a pair of semi-detached flint cottages on Climping Street. Mature tree boundaries to the west will be maintained and improved, with no proposed pedestrian or vehicular access on to Climping Street.

To the east the field boundary hedge will be retained and supplemented by additional planting to provide a strong filter for those viewing the development from the east. The field immediately to the east of the site has been used for 'wild camping' and at the time of writing has a current 'live' planning application for formalisation of this use (CM/7/18/PL).

To the north east the mature hedgerow fronting Crookthorn Lane will again be kept. External storage and other paraphernalia will be removed from the land immediately to the east of the Farm Shop and will be replaced with the Dementia Care Centre car park, which will be well landscaped. The vehicular access to the Wild Camping field will utilise the existing agricultural access to the north east of the site.



The Application Site

The red line site itself measures 2.08 acres and has planning consent for a dog training complex (CM/1/16/PL). It is a very flat site of low ecological value (see accompanying Phase 1 Habitat Survey) and lies outside the floodplain (see accompanying FRA).

It is largely screened from view from the A259 being set back behind the Farm Shop (see accompanying images), and likewise the existing field boundaries restrict all but the most local of views from the east and south. Strong tree lines almost completely screen the field from views to the north and west (see accompanying LVIA).

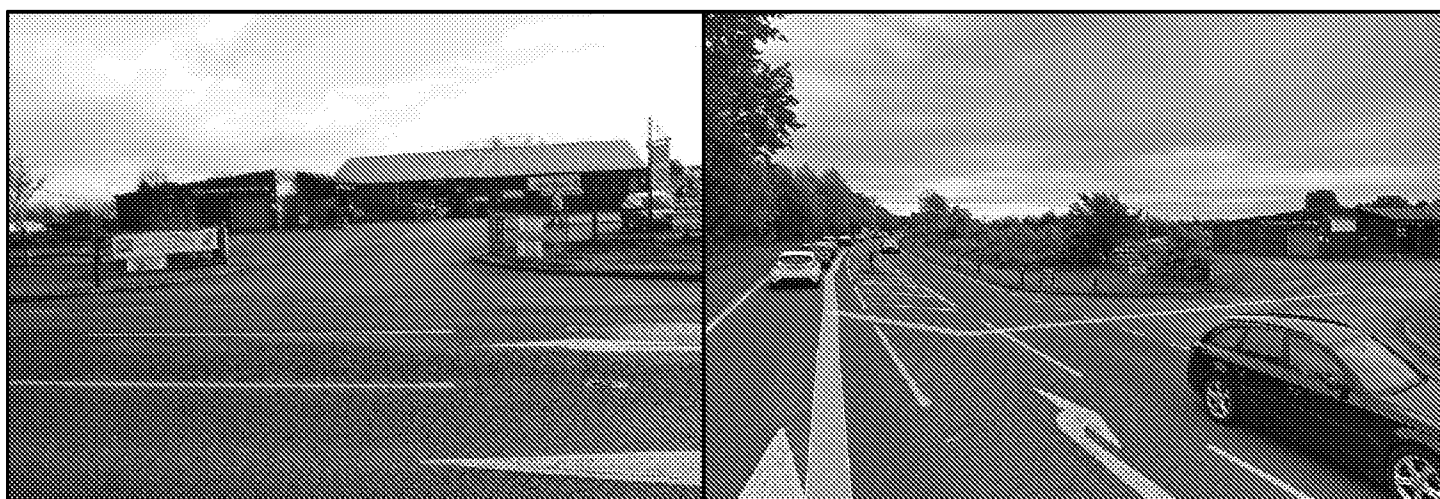
As the site is so well contained by hedgerow boundaries the site itself contributes little to the physical separation of settlements, as existing built form lies to the north and south already, and development here would not encroach toward the north, east, south or west.

Access

The site is proposed to be accessed through the existing Farm Shop access, which benefits from a right-hand turn lane across Crookthorn Lane and offers sufficient radius and capacity to accommodate the proposed development (see accompanying Transport Assessment and Travel Plan).

An existing lit pedestrian crossing is in place to the east of the vehicular access, but a new footpath is proposed to run parallel to the southern (westbound) carriageway of the A259, facilitating a connection with the bus stop on the westbound carriageway and enabling utilisation of the more formalised crossing point to the bus stop of the north side of the road (eastbound carriageway) (see accompanying Highway Improvements Plan).

Public transport serving these bus stops are the local 700 'Coastliner' service between Chichester and Littlehampton which runs approximately every 20 minutes, Monday to Saturday, and every 30 minutes on Sunday (see Transport Assessment for timetable).



Site evaluation

A number of reports and surveys (as listed in the Contents page) have been undertaken in order to assess the site in detail, as follows:

- **Flood Risk** - The site has a low probability of flooding being in flood zone 1;
- **Foul Water** - The development seeks to make a connection into the public sewerage network and the site is outside the Lidsey Foul Water Catchment Area;
- **Surface Water** - Roof run off will be collected and pumped at a restricted 5l/s to the nearest surface water sewer in Climping Street. The use of green roofs and SUDS will reduce surface water runoff and provide ecological value and

enhanced building performance;

- **Transport** – Pre-application discussion with the Highway Authority has concluded that utilisation of the existing access is acceptable and the proposed traffic generation would make an insignificant impact upon the A259 flows;
- **Arboricultural survey** – The condition of the trees bordering the site have been assessed, with Root Protection Areas defined. The trees are in variable condition but can be expected to continue to offer a visual buffer for many years to come. The study concluded that the proposed layout and scale of development is acceptable without harm being caused to any retained trees. Only two trees will be removed to provide improved pedestrian access, both of which are of poor quality and boundary hedgerow gaps will be filled;
- **Phase 1 Habitat Survey** – The site contains no evidence of protected species but the boundary trees and existing portacabins have been assessed as having bat roost potential, the adjacent ponds as having Great Crested Newt potential, and the boundary hedgerows as having reptile refuge potential, therefore ‘phase 2’ surveys were carried out for each of these protected species;
- **Phase 2 Bat Survey** – No bats were found nor any roosts discovered;
- **Phase 2 Reptile Survey** – No reptiles were found on the site;
- **Phase 2 Great Crested newt survey** – GCN’s were found to be in the pond adjacent to the site, therefore a mitigation strategy is being developed;
- **Noise Survey** – The main noise source affecting the development site is the A259 to the north which provides a fairly constant daytime noise level. The noise survey highlights mitigation measures that have been incorporated into the design to create the ideal environment for the residents of the building;
- **Landscape** – A thorough LVIA, supported by Verified Views, confirms that *‘Largely Negligible and Neutral effects are judged to be experienced by many of the other identified receptors (including recreational routes at greater distances, users of local roads, surrounding commercial uses and the wider farmland) and are not significant’*. With the closer, principle receptors having only *‘Minor Adverse local or limited scale effects’*;
- **Heritage Assessment** – The site has no potential for archaeology and has been assessed in terms of potential impact upon the adjacent listed Cottage. The conclusions were that the site makes a *neutral* contribution to the Grade II Listed ‘The Cottage’ and *no meaningful contribution* to the setting or heritage of the nearby Grade II listed buildings Dove Cottage, The Black Horse Public House and Virginia Cottage.

3 Design Evolution

Brackley Investments and our architects (Hunters) initially looked at several design possibilities for the site to deliver a 64-bed care centre. This initial concept design looked at three possible routes; Traditional Design, Contemporary Design & Contemporary Sustainable Design. Below shows the three types of design in sketch form:

TRADITIONAL:

This sort of design was considered in keeping with the local area, whilst the scale and massing of the building would be harder to mask.



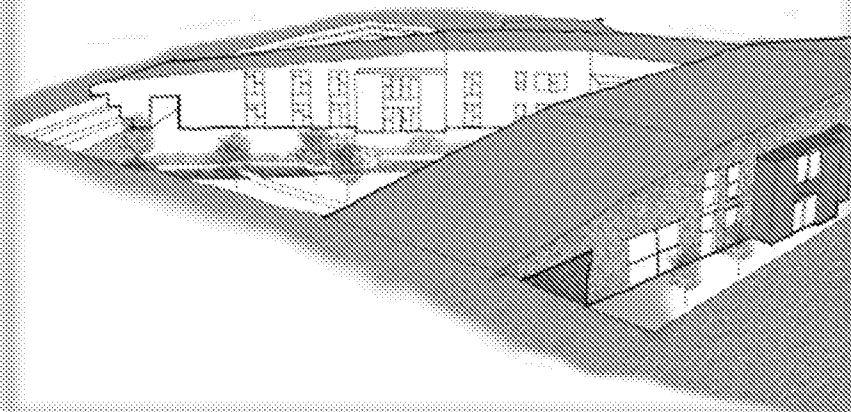
CONTEMPORARY:

This building design is an efficient use of space and means the building mass can be broken up, however, the design can appear institutional and not well integrated into the local area



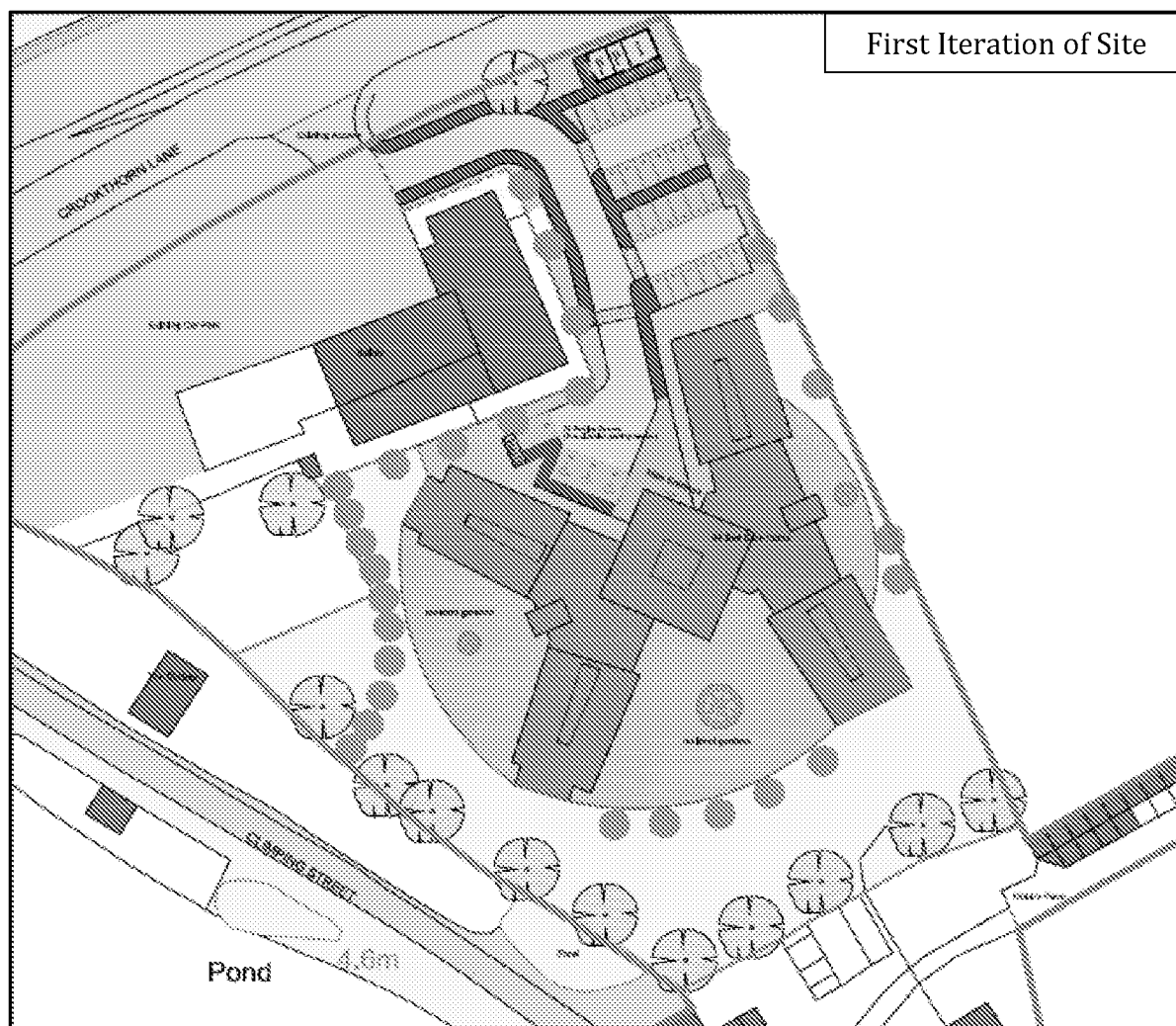
SUSTAINABLE:

Site would blend in with the local landscape to significantly reduce the impact, however such buildings works are often unviable and necessitate appropriate ground conditions



Pre-Application Written Response- Arun District Council

Brackley Investments submitted a request for pre-application advice to Arun District Council on 24th May 2017. The submission featured the proposed first iteration of the site plan (see below) with no elevations or additional images.



The main objectives of the written pre-application request were to ascertain:

- Whether the Council agreed with the need for Specialist dementia care;
- The suitability of the chosen location;
- Site specific Design, Amenity, Highway, Heritage and Landscape considerations.

Prior to the site meeting, we received written pre-application advice on 7th August 2017. The table overleaf outlines the Officer's informal view on the development of the site for a proposed 64-bed Dementia Care Centre as initially tabled:

	POSITIVE	NEGATIVE
Principle of Development	Restrictive development policies within the saved local plan are 'out-of-date' due to the council being unable to demonstrate a 5-year housing land supply	
Design		Concern due to the full two storey scale and mass of the building upon the character of the locality
Amenity	By virtue of its height, layout and location (limited residential development in close proximity), the proposed development is not considered to give rise to any unacceptable adverse impacts.	
Highway	The highway Authority confirmed the proposed use of the existing access to be acceptable, based on the low levels of traffic generation resulting from the proposal	
Heritage		The Council's Historic Buildings Advisor noted the proposed initial 2-storey building might affect the setting of listed building (The Cottage).
Sustainability	<i>Environmental Role:</i> Accept the proposal is unlikely to generate a demand for local shops and services. The key consideration is the visitors and staff. The site is well provided for via the local bus stops within 150m of the site. <i>Economic Role:</i> The proposal will result in localised economic benefits through the generation of both construction jobs and long-term jobs to provide care on site. The proposal will result in an increase in Council Tax receipts and new homes bonus payments. <i>Social Role:</i> The council consider the proposal will provide a number of social benefits specifically by providing for the needs of an ageing population.	



Design Response to Written Pre-Application advice

The above comments were assessed as balanced, with support given for the need for and benefits of the development, and affirmation of the appropriateness of the site in several regards, along with concerns regarding the initial scale, massing and design.

With Operator interest clear and independent support for the Need in place, we set out determining what alterations could be possible in order to secure a planning consent.

In this regard, certain factors are ‘non-negotiable’ but others are capable of alteration – and thus a thorough review was undertaken. This concluded that whilst the pure scale of accommodation (64 bedrooms with appropriate shared facilities) could not change, various elements of the proposed design (layout, elevations, roof design and materials) could be improved in order to reduce the impact of the development upon its setting.

Operational Viability

In order for best practice in dementia care to be applied, an efficient staffing ratio is required. This means an optimum number of bedrooms per wing, and a certain layout of accommodation to balance staff visibility with promoting residents independence.

Thus, 8 bedroom wings of accommodation are required, sharing kitchen and dining areas with another wing, thus forming a ‘household’ of 16 bedrooms. All accommodation must be at an appropriate scale in terms of bedroom sizes as well as communal spaces.

A further element of best practice is in the provision of ‘destination’ facilities and services in-house for all residents, likewise the internal laundry, kitchen and administrative spaces. This requires a certain critical mass, and thus the Dementia Care Centre works on a floorplate of 32 bedrooms.

In order for a charitable trust such as the intended client HMT to have a viable development, and therefore (as a not-for-profit organisation) to keep prices affordable for local residents, two floors of such accommodation are required.

Furthermore, the building must also be a single entity – therefore the accommodation (unlike Extra Care or Assisted Living) cannot be broken up into physically separate units.

Finally ground investigations were undertaken to assess the suitability of reducing the finished floor level by digging into the site. It was concluded that the high water table and degree of permeability of the soil was such that this would not be possible.

Design Improvements

A more sensitive design was developed taking into account the semi-rural location and incorporating a mixture of contemporary design with the best features from the local vernacular. Reducing the height of the building was a key consideration.

Layout

The footprint was altered to break-up the massing with stepped wings of accommodation and the building moved away from the nearby Grade II Listed Cottage.

Elevations

The ridge height of the building was reduced by over a metre to 7.5m, thus being below the ridgeline of the adjacent Cottage, and not significantly higher than that of the Farm Shop itself. This was done by placing the first floor accommodation within the roofspace, and using a series of dormer windows to maintain appropriate headspace.

Roof

Lowering of the eaves level by adopting a domestic scale pitched roof with a flat topped mansard roof above enabled a sedum roof to be applied.

Materials

Local materials were applied to the elevations including flint panels and blackened timber as well as brickwork, whilst the use of slate roof tiles also helps assimilate the building into its surroundings.

Once these changes were adopted further design ideas were submitted to the Pre-application case officer and a meeting was arranged to discuss further.

Pre-Application Site Meeting 28 September 2017

In attendance were:

- David Easton – Principal Planning Officer, Arun District Council
- Andy Marshall – Planning Director, Brackley Investments
- Jordan Langdon-Bates – Development Surveyor, Brackley Investments

Notes of meeting:

Mr Easton accepted the need for the form of development proposed and spoke

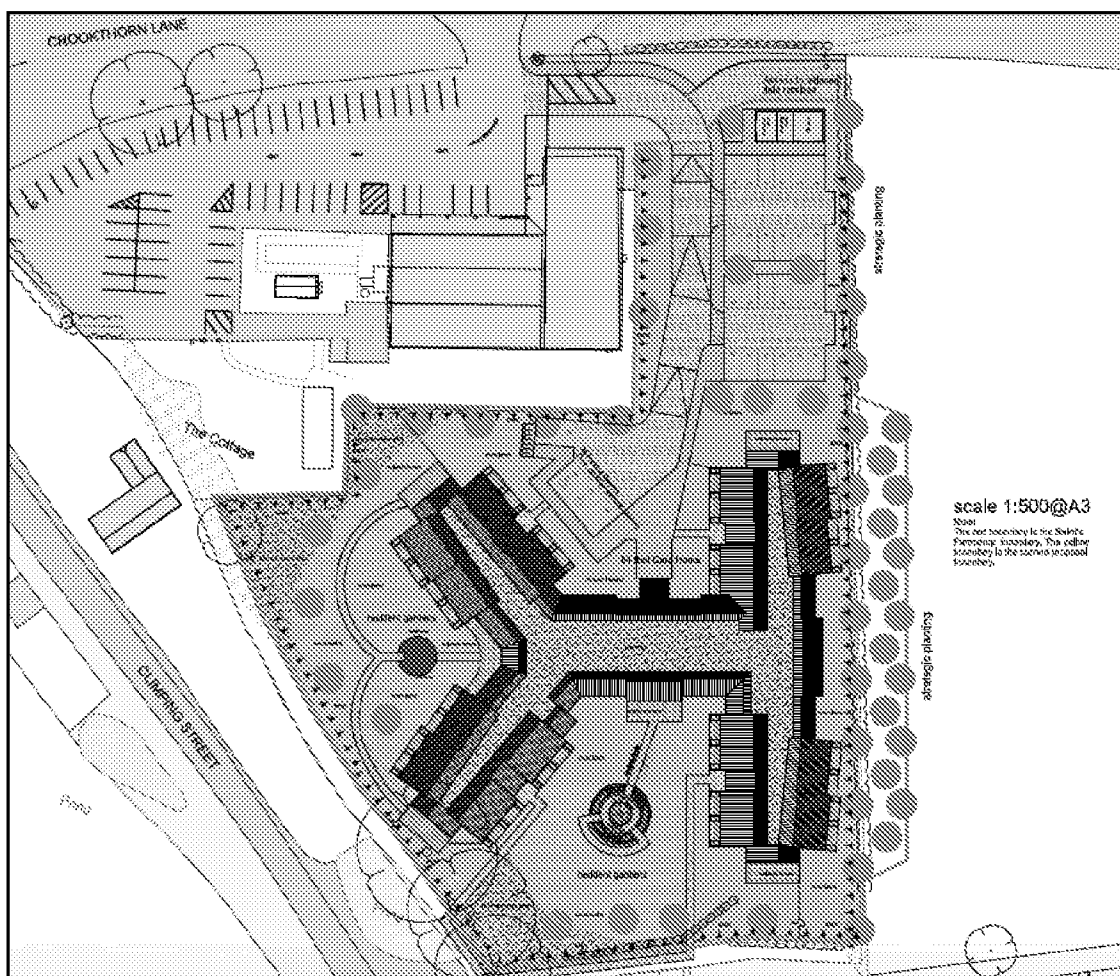
positively of the extent of screening of the site, noting that the hedges and trees had grown considerably since his last visit to the site. Mr Easton viewed the site from the local PROW and again noted the extent of the existing and consented development surrounding the site.

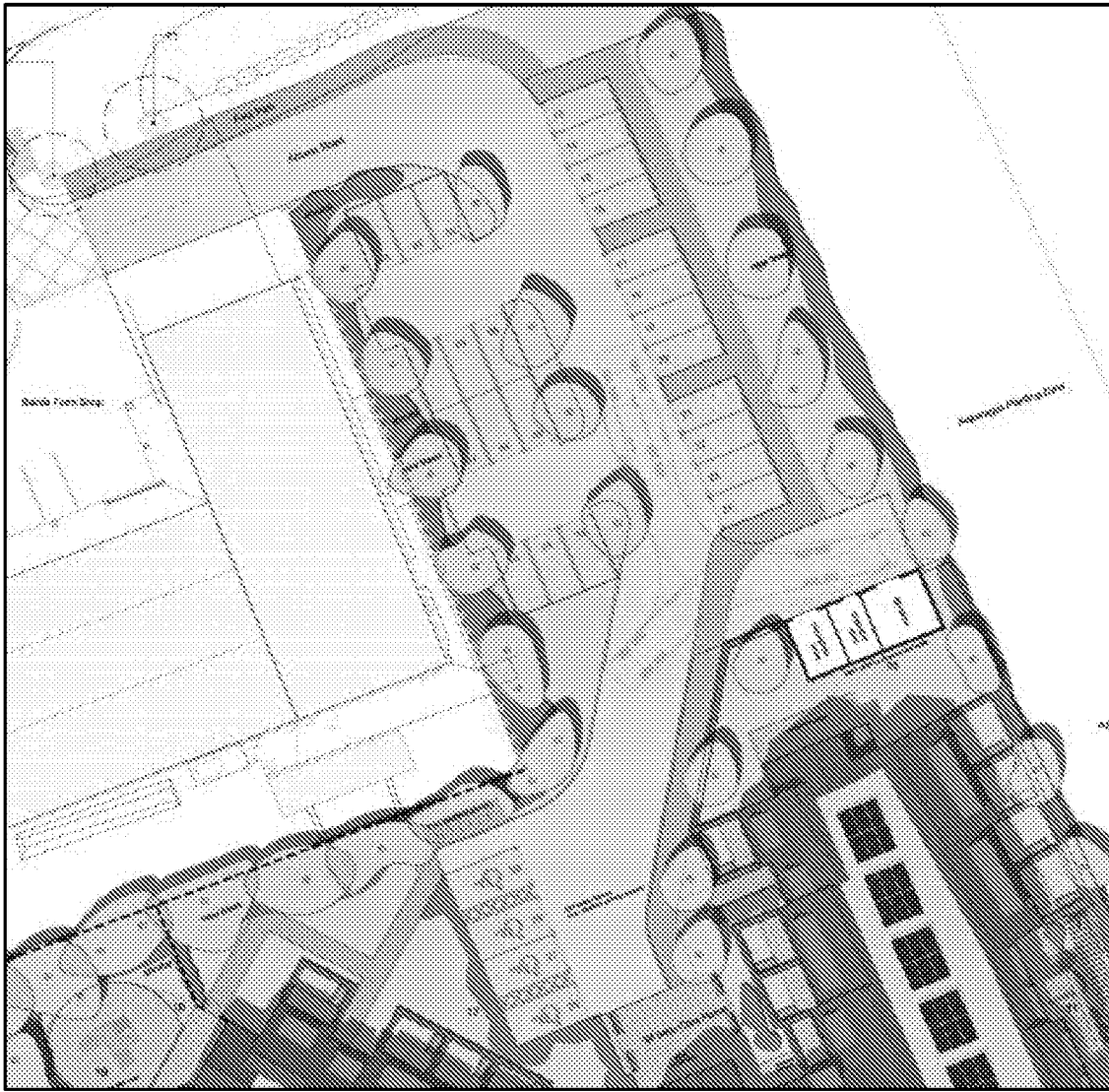
Mr Easton concluded that a case could be made for the proposed development in light of the sites limited role in maintaining the gap between Littlehampton and Middleton on Sea given surrounding development and its sense of enclosure.

Mr Easton agreed with the suggestion of minimising the scale and massing of the building as much as possible in order to limit the physical and visual impact.

Post – meeting improvements

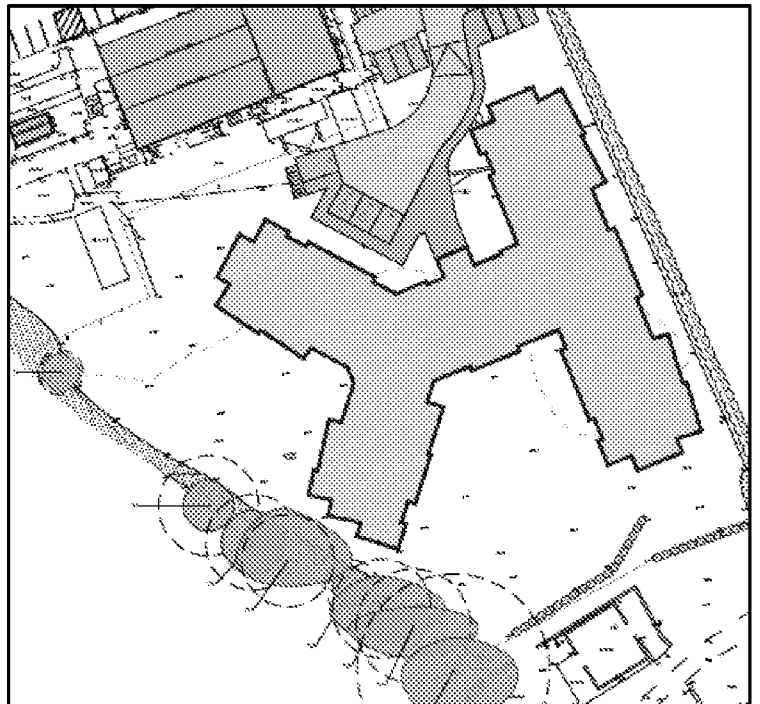
Following the meeting we continued to improve the design. The layout below shows the original parking area. This design shows a large level of tarmacked area, this was reduced to the parking arrangement show overleaf. This image shows how the tarmacked area has been broken up with green corridors and additional planting to soften the visual impact.



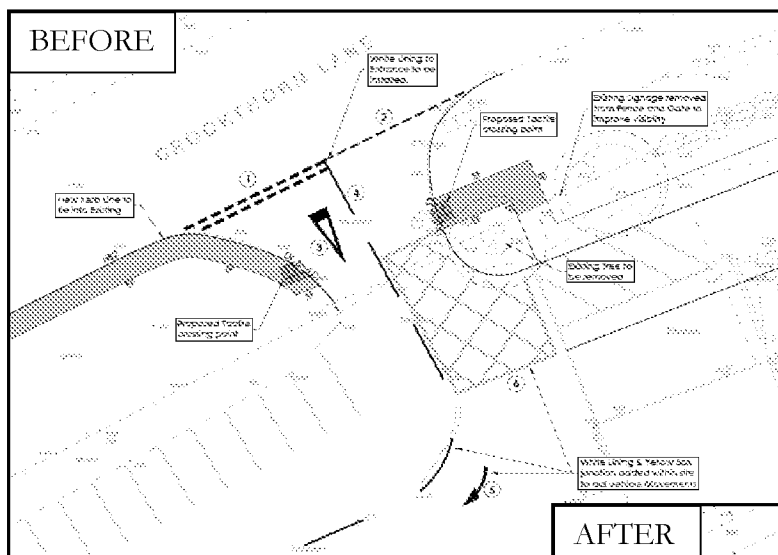


Following further survey work and the Arboricultural report of the on-site trees, further alterations to the scheme were made which involved:

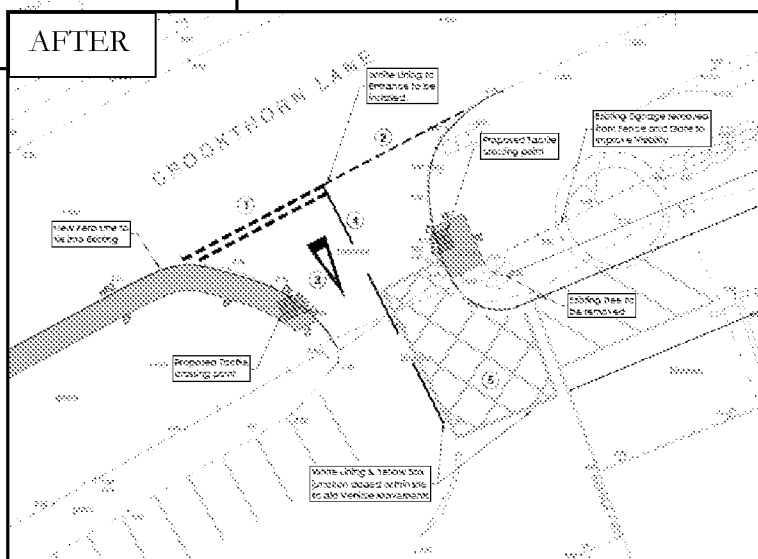
Moving the South-Western wing away from the Root Protection Zones (RPZ) of the trees along the Boundary along Clipping Street. The drawing adjacent shows how the proposal respects the existing trees and the RPZ's.



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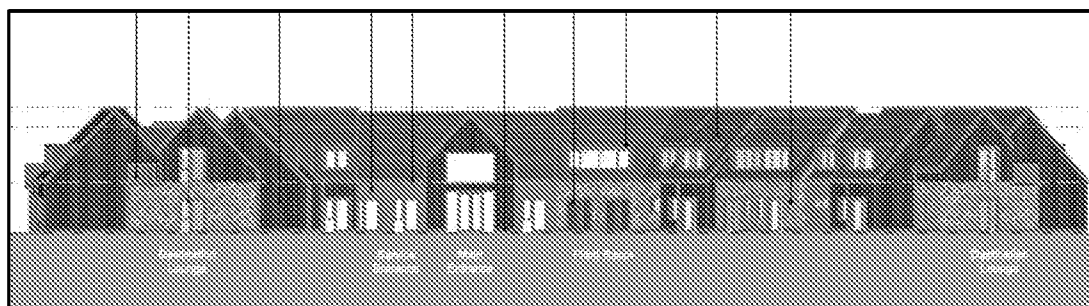


Altering the footpath access along Crookthorn Lane (A259) due to the trees either side of the main vehicle entrance being of poor quality and therefore not required for retention. These off-site works have been altered to extend to the bus stop on the southside of Crookthorn Lane to improve access to varying modes of transport.



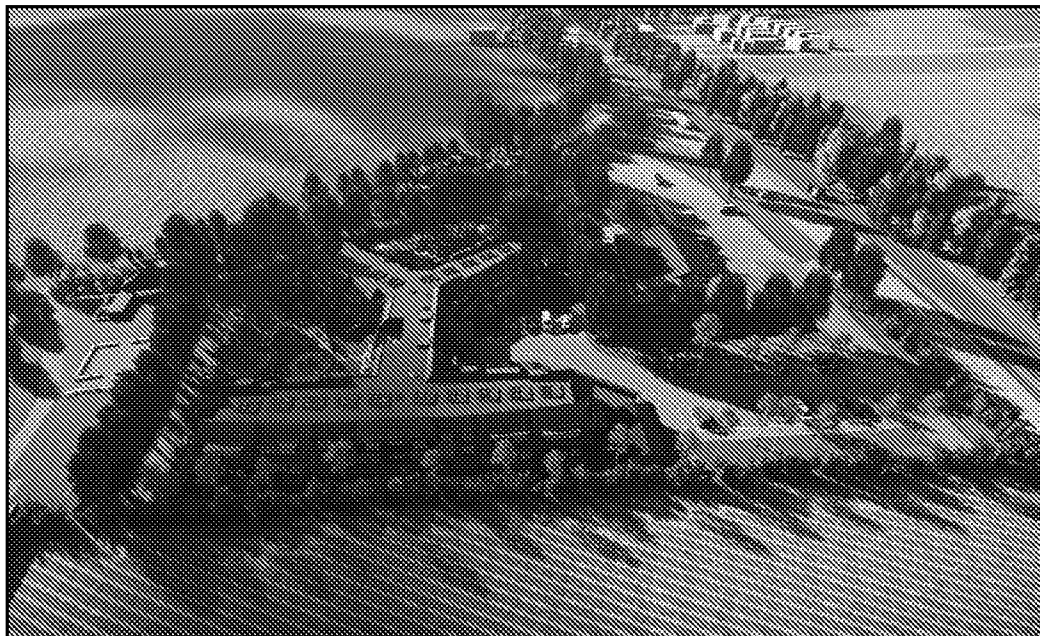
Proposed Site Elevations

Below are two site elevations showing how the design has evolved showing the reduction in building height through a 1 ½ storey design with rooms in the roof. These also show how the design and cladding has been influenced by local design.



Proposed 3D Model of Development

The image below shows a 3D model of the building following all the changes made throughout the consultation process.



The sedum roof is evident and helps to blend the development into the local landscape alongside the stepped roof design which breaks up the overall massing of the building in response to the reservations from the Council.

Landscape Design

Once the building design and position had been set through the various iterations, the landscape masterplan was designed to ensure further enhancements and visual improvements. These range from:

- Tree planting within the hard-landscaped areas to soften them
- Strengthening of the eastern tree boundary, to visually reduce the impact of the building as seen from the public footpaths
- Retention of western tree boundary to maintain the character of Climping Street
- Layering of boundary vegetation to create a diverse screen and robust landscape
- The introduction of suitable planting to soften the incidental spaces



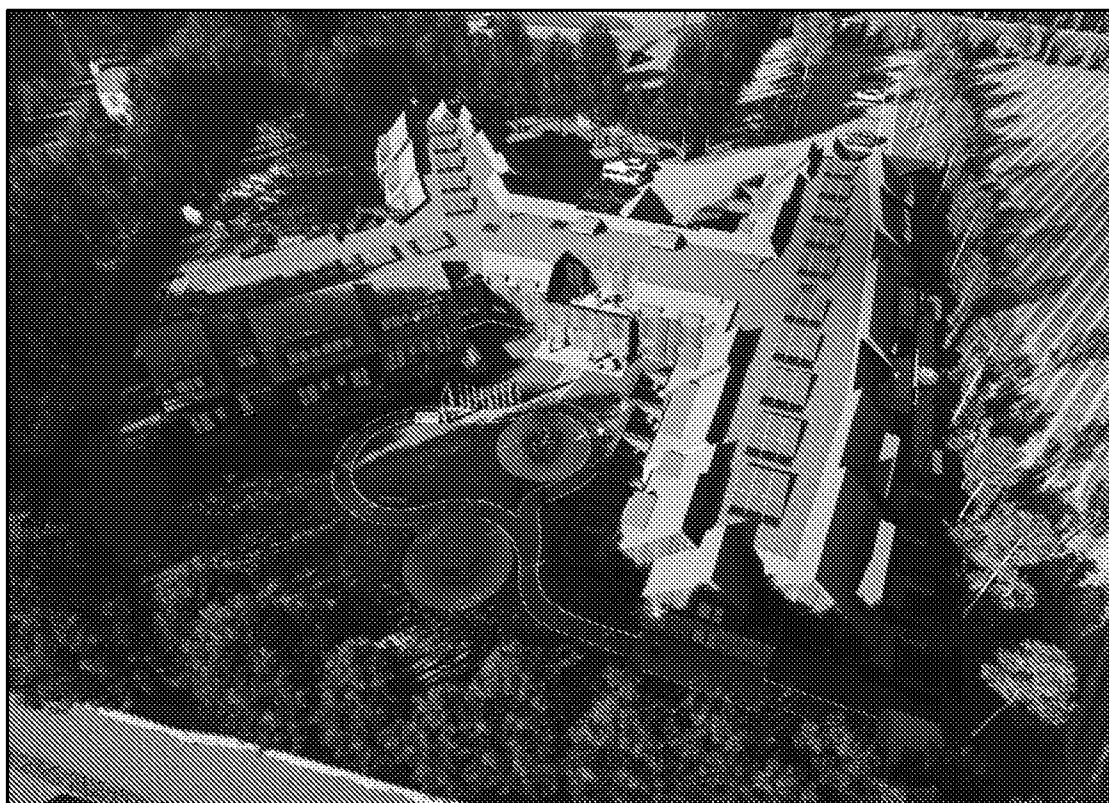
4 Proposed Development Form

Design Approach

The proposed dementia care centre strikes an appropriate balance between minimizing visual impact whilst producing an efficient use of land as it provides the necessary 64 beds of accommodation with generous bedroom sizes and communal areas, along with pleasant grounds and sufficient car parking.

Yet it is one and a half storeys in height and therefore has a ridge line lower than that of the adjacent Cottage and less than 1.5m taller than the single storey farm shop ridge.

Great care has been taken to break-up the apparent 'bulk' of the building, through footprint, elevational treatment and roofscape, in order that the building is both viewed externally and experienced internally as a collection of smaller buildings rather than a single mass. It is imperative however that the building is a single unit, in order for nursing staff to be close at hand to all residents, and in order to secure their safety.



A dementia care centre is self-contained: the site itself is secure and no residents would leave the premises on their own. Thus, the gardens are secure (with close boarded fences) and there is no danger of any residents straying out onto the A259.

The Home contains ‘destinations’ including a cinema, hair salon, café bar and terraces overlooking the gardens. Thus, when visitors arrive they would ordinarily tend to take their loved ones to an internal destination rather than leave the premises, however they may also wish to take in a trip to the nearby seaside.

Site layout

The site is accessed by pedestrians via a new footpath to be laid within the highway verge, linking to bus stops and crossing points along Crookthorn Lane. This helps connect the site to the local facilities which staff or visitors may choose to utilise – including The Oystercatcher pub or walking to the site from the St Mary’s School, or from the housing estate on Horsemere Green Lane.

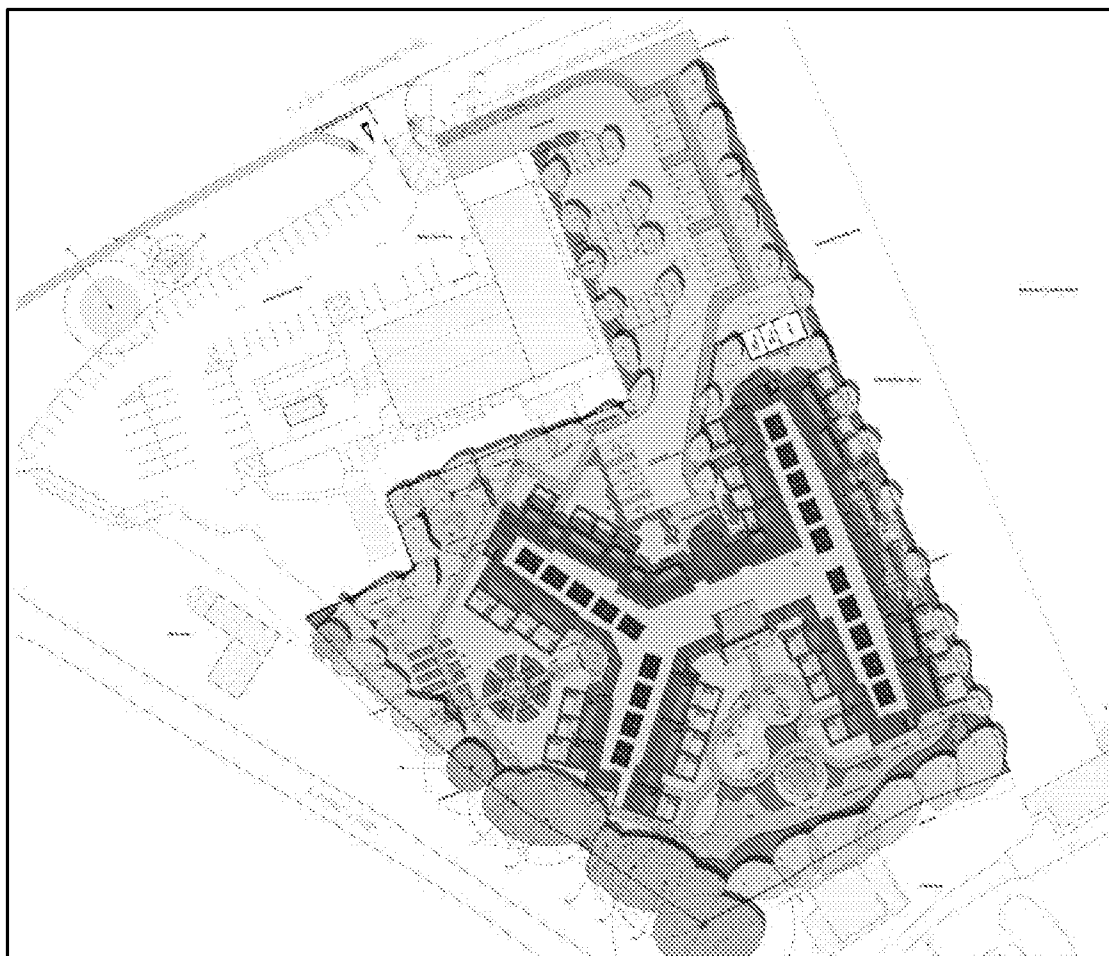
The existing vehicular access to the Farm Shop (complete with right hand turn lane) will be utilised, with both uses sharing the initial part of the Farm Shop entrance / turning area. A swept path analysis has been undertaken to demonstrate that this entrance is suitable for refuse vehicles and emergency apparatus to access the site.

The 2 acre site is in a ‘reverse L-shape’, and therefore naturally lends itself to the narrower frontage of the site being utilised as the car parking area. The vehicular and pedestrian access into the site is situated on a quasi-brownfield section of land, which is currently given over to outbuildings, external storage and hardstanding. Thus, this most prominent frontage to the site will be greatly enhanced and tidied-up.

It is important that this area is well maintained and kept clear of development, to enable ease of wayfinding to the entrance of the Dementia Care Centre, thus the car parking is attractively laid out and landscaped.

As described in the previous chapter the mature trees and hedgerow along the site’s boundaries are all to be retained and supplemented with new native planting, whilst the portacabins on the site’s northern boundary will be removed and replaced with new landscaping to soften the views of the rear of the Farm Shop.

The appended landscape masterplan illustrates how the comprehensive, strategic planting scheme will help negate the visual impact of the development by keeping views of the building limited to filtered views through vegetation and of the roof ridge only.



Car parking is laid out in front of the centre in order to minimise the distance for travel and 28 spaces are provided on site, this includes 4 disabled spaces and an additional 12 spaces for bicycles. This figure is based on our experience of developing several care homes, and working on an approximate 1 space per 2 beds.

We have surveyed operational premises and found this level of car parking to be sufficient for a 64-bed care home, given that no residents have cars, many staff would be expected to travel by bus, and visitors would have options to walk, cycle or take the bus.

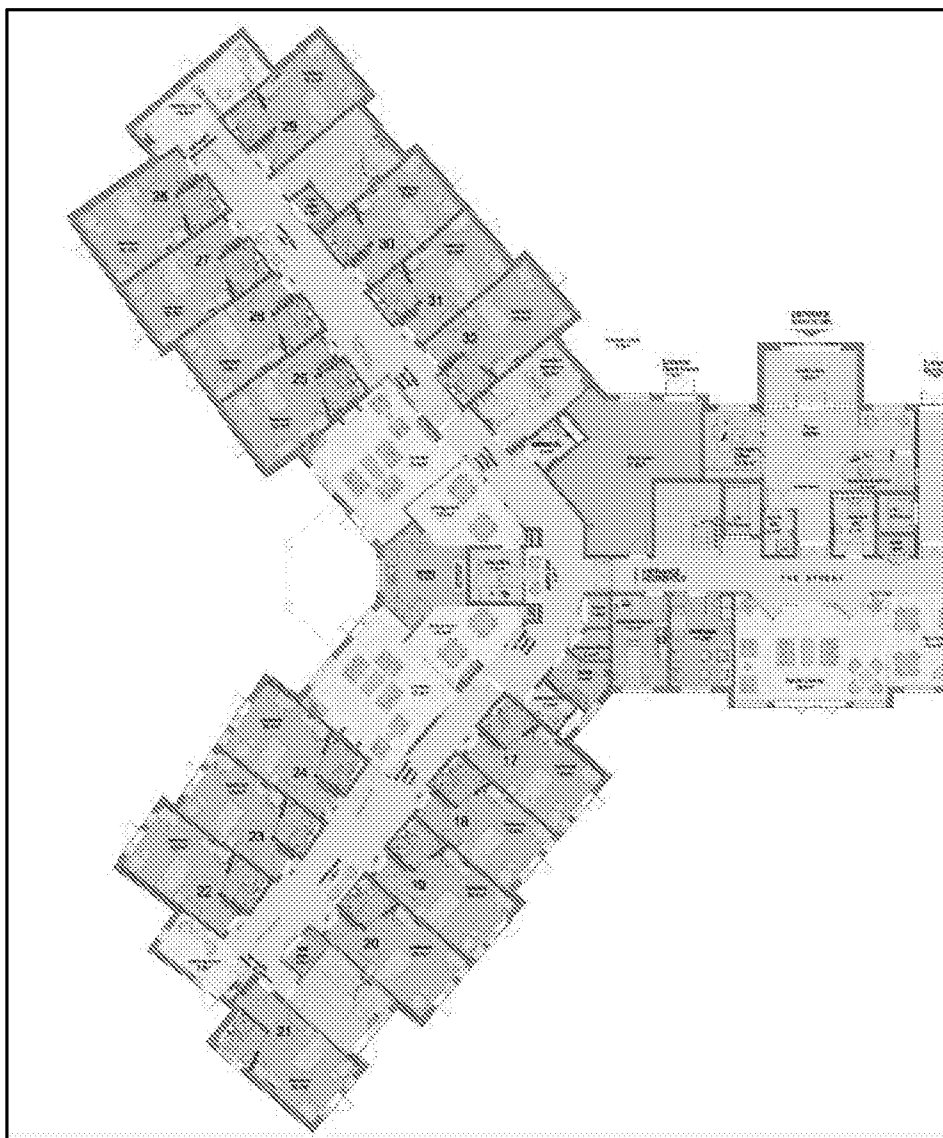
The building itself leans towards the eastern part of the site to maximize the distance from the adjacent Grade II Listed Cottage. The general layout is a cruciform shape with four wings of accommodation splaying off from a central entrance and communal area. This allows for all bedrooms to benefit from views onto gardens and landscaping.

Internal building design

Hunters Architects, Brackley and the wider design team are all experienced at designing and developing high quality dementia care facilities which follow best practice design principles and follow a 'household' model, the idea of which is centred around wings of

just 8 bedrooms, with their own communal areas, and grouped with just one other wing of 8 rooms to create shared kitchen, dining and lounge areas for 16 residents – thus a more domestic experience for residents.

Each wing has its own distinctive design cue and aides residents familiarity through the use of themed lounge areas at the end of each wing (also thus avoiding dead-ends which can greatly confuse dementia sufferers).



The 16 bed households are then replicated on the ground floor, and again at first floor level, which provides optimum nursing management, and allows for specific acuities of dementia to be grouped together.

Each household splay off from a central hub which contains the communal facilities on one level, with shared services (main kitchens, laundry and administrative spaces) on the other level. The entrance atrium is light and airy and offers clear way-finding for visitors.



External appearance

Architectural cues have been taken from the site's semi-rural location, thus featuring the use of heritage flint panels, red brickwork and blackened timber under a slate tile pitched roof (featuring a sedum roof central section, with photo-voltaic panels).

First floor dormer windows are a strong feature, allowing sufficient headspace within the bedrooms, yet allowing the roof to dominate, thus reflecting the adjacent farm shop.

Roof design is articulated to keep the ridgeline as low as possible and below the Cottage.



Perspective images are appended, together with the full suite of planning drawings as part of the full planning application. Further information on the design can be found within the accompanying Design & Access Statement.

These serve to demonstrate the high-quality approach, both from a functional perspective which is focussed on delivering a first class care environment, and from an external perspective, which is focussed on minimising the visual impact of the premises.

The accompanying LVIA concludes that the impact of the development would be of a minor adverse nature, by virtue of the attention given to softening the physical scale and massing of the building and positioning it within a well landscaped setting.

5 National Planning Policy Context

Consultation Draft NPPF (March 2018)

The recent consultation draft of the National Planning Policy Framework was released on 5th March 2018 with consultation having recently finished. This document sees an overhaul of the original NPPF to help drive delivery and streamline the planning process. However, this is at draft stage and therefore does not hold any planning weight currently but is a clear indicator as to the Governments' direction for stimulating the right type of development where it is most needed.

Paragraph 8 looks to strengthen the key theme of the current NPPFs three strands of sustainability. Within the social role of sustainability, it states that “*sufficient number and range of houses*” which is not just defined as C3 residential but should include “*the **full range** of retirement and specialised housing for those with support or care needs*”. This supports the need to deliver not only C3 residential but further housing such as C2 Care Homes alongside extra-care to ensure the full range of needs are met.

Paragraph 9 further iterates the point that the planning policy should take ‘*local circumstances into account, to reflect the character, needs and opportunities of each area*’. Identifying the point that if they do not fully reflect the needs identified in a local area, the presumption in favour of sustainable development should be taken.

Paragraph 11 states that ‘*plans and decisions should apply a presumption in favour of sustainable development*’. For decision-taking this means approving applications ‘*that accord with an up-to-date development plan without delay*’. Given the proposal is in accordance with both the current and emerging development plan, the application should be approved without delay.

Paragraph 62 of the draft NPPF notes that “*policies should identify the size, type and tenure of homes required for different groups in the community (including ... older people.)*”. There is a key emphasis on the delivery of additional Care provision nationally, and especially where the need is more critically identified and there is an existing undersupply.

Paragraph 75 introduces the need to deliver a 5-year supply of housing; and as outlined above within para 8 and the NPPF's definition of housing the proposed care centre would constitute housing in the broader sense. As such if the local authority cannot demonstrate a 5-year supply of housing, then the Para 11d will apply and ‘*granting permission unless... any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole*’.

Housing White Paper 'Fixing our broken housing market' February 2017

This most recent Government policy statement recognizes the ageing population, encourages the development of more supported housing for older people and places a new duty upon Local Planning Authorities to include housing for older people within their objectively assessed housing need analysis. This now features as a proposal within the draft consultation revised NPPF.

Written Ministerial Statement - 12 December 2016

The introductions of the Written Ministerial Statement brought into perspective relevant policies for the supply of housing in a neighbourhood plan, that is part of the development plan, should not be deemed to be 'out-of-date' under paragraph 49 of the National Planning Policy Framework where all of the following circumstances arise at the time the decision is made:

- This written ministerial statement is less than 2 years old, or the neighbourhood plan has been part of the development plan for 2 years or less;
- The neighbourhood plan allocates sites for housing; and
- The local planning authority can demonstrate a three-year supply of deliverable housing sites.

Given that Arun has less than 3 years housing land supply and the Clymping Neighbourhood plan does not allocate sites for housing, it is only to be considered not out-of-date by virtue of the likely determination of the application to which this Statement relates being within two years of the Written Ministerial Statement.

As the Neighbourhood Plan is however deemed up-to-date relevant policies are considered within this Planning Statement.

DoH Prime Minister's challenge on dementia 2020 - February 2015

David Cameron, then PM, stated a desire by 2020 for England to be the best country in the world for dementia care and support and the best place in the world to undertake research into dementia and other neurodegenerative diseases and called for equality of access to the best dementia care across the country.

Our client operators are at the forefront of dementia research and are proposing first class care and support to residents of Arun district, where there is very little current, dedicated dementia care provision.

The report provides some key findings, including:



- Dementia is one of the top five causes of death: 1 in 3 people who die over 65 years of age have dementia;
- The number of people who have dementia is set to double in 30 years;
- 25% of people in hospital beds have dementia;
- 33% of people with dementia reside in care homes, and
- 69% of care home residents have dementia.

National Planning Policy Framework 2012 ('The Framework')

The Rt Hon Greg Clark MP's Ministerial Foreword notes: *"We must house a rising population, which is living longer and wants to make new choices...our lives, and the places in which we live them, can be better, but they will certainly be worse if things stagnate. Sustainable development is about change for the better... so sustainable development is about positive growth – making economic, environmental, and social progress for this and future generations. The planning system is about helping to make this happen."*

Development that is sustainable should go ahead without delay – a presumption in favour of sustainable development that is the basis for every plan and every decision.... Planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives"

Achieving Sustainable Development

Paragraph 7 of the Framework establishes three dimensions to sustainable development – social, economic and environmental. The proposed development delivers extensive benefits in respect of social care together with significant economic impact, whilst in environmental terms the site is sustainably located in an accessible location adjacent complimentary facilities and the building minimises loss of greenfield land.

Paragraph 8 states that the planning system *'should play an active role in guiding development to sustainable solutions'*. The proposed application site is a sustainable one, being accessible for staff and visitors via a range of transport modes, whilst not materially harming the purpose of the Strategic Gap in preventing the coalescence of Littlehampton with Middleton on Sea.

Paragraph 9 notes that *'pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including:*

- *Making it easier for jobs to be created in cities, towns and villages;*
- *Achieving net gains for nature;*



- *Replacing poor design with better design;*
- *Improving the conditions in which people live ... and;*
- *Widening the choice of high quality homes.*

The proposed development will provide local jobs together with knock-on benefits to local businesses in Climping, the other local villages and indeed Littlehampton. The social benefits of the proposal are clear, as the development will provide a high quality-built development with 64 much needed specialist dementia care beds within a borough with a high elderly population whilst also providing additional choice.

The proposed design, both internally and externally, provides 'better design' as the development involves removal of unsightly portacabins and external storage areas, and is of a high design quality.

The facility will greatly improve the conditions within which local people living with dementia experience, in providing purpose-built specialist accommodation, and delivering additional societal benefits by freeing-up care home residents former family homes. This also widens the choice of homes and so achieves each of the pursuits of sustainable development outlined in paragraph 9 of the Framework.

The presumption in favour of sustainable development

Paragraph 11 re-iterates planning law that planning decisions must be made in accordance with the Local Plan unless Material Considerations indicate otherwise. There are several such material considerations in play with regard to the proposed development, which are set out below in Chapter 6.

Paragraph 14 introduces the presumption in favour of sustainable development as a 'golden thread' running through plan making and decision - taking and states that "***For decision taking this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework when taken as a whole; or specific policies in this Framework indicate development should be restricted.***"

The latest publicly – available housing land supply figure for Arun district (quoted in the Statement of Common Ground in Appeal APP/C3810/W/16/3155330) is 2.09 years. Relevant policies of the Adopted Local Plan restricting housing development are therefore out of date.

Furthermore, **the Adopted Local Plan is silent on older persons housing (C2 development)**. As GEN 2 and GEN 3 are out of date with regard to developing outside urban areas (in the countryside) and the proposed development will not harm the purposes of the Strategic Gap Policy AREA 10, the application should be approved without delay.

However, if the proposal is deemed not in compliance with Policy AREA 10, the Weighted Balance is engaged, and the harm would need to significantly and demonstrably outweigh the benefits (as set out in Chapter 7).

The proposed development is an entirely sustainable one, and any harm is extremely limited (as evidenced by the various supporting documents).

Paragraph 49 states that *'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 5-year supply'*.

The following text will assess whether there are indeed any other policies within the Framework which indicate that the proposed development should be refused.

Core Planning Principles

Paragraph 17 establishes twelve core planning principles, stating that planning should:

'Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth' and 'take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs'.

The best way in which to enhance older people's lives is to provide them with the highest levels of care and best practice available as close to their community as possible.

Supporting a prosperous rural economy

Paragraph 28 provides support for economic growth in rural areas to create jobs and prosperity by *'taking a positive approach to sustainable new development ... support the sustainable growth and expansion of all types of business and enterprise in rural areas both through conversion of existing buildings and well-designed new buildings'*.

The application site is in a rural location and the much needed and well-designed proposals are supported by the paragraph above. The proposed development will support local businesses, free up homes in the area and create skilled employment for local people. Designed by leading care architects Hunters, the Centre is a bespoke, high quality design, which will be viewed within the context of the Farm Shop and other existing businesses.

Promoting sustainable transport

Paragraph 32 calls for development generating significant travel movements to take account of the need to provide safe and suitable access for all people. Pre-application discussion with the Highway Authority has confirmed that the proposed use of the existing access to serve the proposed development is considered acceptable, based on the low levels of traffic generation resulting from the proposed care home. A stage 1 Road Safety Audit and designers' response is also submitted in this regard.

Paragraph 32 also informs that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Again, the Highways Authority have confirmed that there is no need for a detailed junction assessment given the low levels of traffic generation (an additional 8 cars an hour in the morning peak and 12 cars an hour in the afternoon peak), with most staff and visitor trips occurring in off-peak hours.

Paragraph 36 requires travel plans to be provided for all significant traffic generating developments. This is also appended to this application.

Good design

Paragraphs 56 to 68 set out the importance of good design - noting that it is a key aspect of sustainable development.

Paragraph 58 establishes decision - making criteria on design for new developments:

- *“Development that functions well and adds to the overall quality of the area over the lifetime of the development;*
- *establishes a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *optimise the potential of the site to accommodate development - create and sustain an appropriate mix of uses including incorporation of green and other public space, and support local facilities;*
- *responds to local character and history and reflect the local identity of surroundings and materials – while note preventing or discouraging appropriate innovation;*

- *creates safe and accessible environments with quality of life and community cohesion; and*
- *visually attractive developments as a result of good architecture and appropriate landscaping*".

The appended Design & Access Statement demonstrates the careful design approach, intended to help the building blend with surrounding developments.

Paragraph 60 notes that *"Planning decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is however proper to seek to promote or reinforce local distinctiveness"*.

The proposed design strikes this balance perfectly – incorporating flint panels and modern materials, but with a rural feel - including timber cladding in contrast to the facing brickwork.

Community Involvement

Paragraph 66 concerns public consultation in stating that *"Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked upon more favourably"*.

The accompanying Statement of Community Involvement summarises the extensive community consultation undertaken through our Public Information Event and consultations with Clymping Parish Council and local Ward Members. Comments relating to design were considered by the design team and directly led into the next iteration of drawings, and the overall response to the plans has been very positive.

Decision Taking

Paragraph 186 states that *'LPAs should approach decision taking in a positive way to foster the delivery of sustainable development.'* For the reasons set out above the proposal to which this statement relates should be deemed a sustainable form of development, thus demanding a positive approach to facilitate its delivery.

Paragraph 187 states *'LPAs should look for solutions rather than problems' and that 'decision-takers at every level should seek to approve applications for sustainable development where possible' and that 'LPAs should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area'.*



Pre-application engagement and front-loading

Paragraphs 188-191 advocate good quality pre-application discussions to enable improved outcomes for the community. We have benefitted from a productive meeting with Planning Officer and likewise with West Sussex County Highways - this process enabled us to scope-out the extent of background reports and surveys necessary and resulted in improvements being made to the proposal.

Determining Applications

Paragraph 196 states that *‘planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise’* before confirming that *‘This Framework is a material consideration in planning decisions’*.

Paragraph 197 reminds us that *‘in assessing and determining development proposals, LPAs should apply the presumption in favour of sustainable development’*.

Chapter 6 of this report demonstrates significant Material Considerations which ought to be afforded substantial weight such as to override non-compliance with certain development plan policies.

National Planning Policy Guidance (NPPG)

Paragraph 021 (Reference ID: 2a-021-20160401) is considered highly relevant to this application. It represents the Government’s most recent policy statement on **housing for older people** (1 April 2016):

“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new ...Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied.

The future need for specialist accommodation for older people should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions.”

The accompanying Planning Needs Assessment undertaken by Carterwood utilises such a toolkit to analyse the need for care home accommodation. This highlights a need for many beds specifically for dementia care, taking into account already planned schemes within the market standard 5-mile catchment area, the District – wide catchment, and a more local 2.5-mile catchment.

It is therefore demonstrated that the proposal constitutes a sustainable form of development, and has many attributes weighing in its favour. If the development is in accordance with the Development Plan then it should be approved without delay, but if it is not then any harm must significantly and demonstrably outweigh these benefits.

The next stage is then to consider in full the extent to which the proposal accords with the Saved, Adopted Local Plan policies which remain up-to-date and relevant, along with emerging planning policies.

6 Local Planning Policy Context

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that, when making a determination under the Planning Acts, the determination shall be made in accordance with the development plan unless Material Considerations indicate otherwise. The relevant Local Development Plan against which proposals will be considered is comprised of the saved policies of Arun Local Plan 2003, the Emerging Arun Local Plan 2011-2031 and the Clymping Neighbourhood Plan.

Arun District Council Local Plan 2003

The Arun District Local Plan 2003 covered the period up to 2011 but many policies have been Saved for development management purposes due to the replacement plan having not yet been Adopted. The Saved Policies should be afforded weight in accordance with their degree of consistency with The Framework and with housing land supply.

Arun District Council (ADC) are unable to demonstrate a 5-year supply of housing, with the latest appeal decisions APP/C3810/W/17/3185128 and APP/C3810/W/16/3155330 declaring a ‘less than two year supply’ and ‘2.09 years supply’ respectively.

The former appeal incorporated a Care Home as well as up to 90 dwellings, which was recognised by the Inspector as having societal benefits, and the decision determined that only limited weight should be afforded to the emerging Local Plan – the draft policies of which are evaluated below.

The Appeal decision for the application on ‘Land west of Brook Lane and south of A259’ (Ref: APP/C3810/W/17/3185128) confirms that Policies GEN 2 and GEN 3 are out of date, as they restrict housing development with regard to settlement boundaries and development in the countryside outside built up areas.

The proposed C2 use is a form of Housing development (as confirmed by the Framework), and therefore Policies GEN 2 and GEN 3 are out of date in the determination of the application to which this statement relates.

Should there be any doubt as to whether the proposed development contributes to housing land supply, reference should be made to the Council’s Updated Housing Need Report (September 2016) which concludes that as C2 developments have the effect of freeing-up market housing, they indirectly contribute to housing land supply.

Several Saved Policies of the Adopted Plan are deemed to be still in date, as they don’t

directly restrict housing development. The proposed development's degree of conformity with each relevant policy is therefore considered below:

Strategic Gap

Policy AREA 10

The site lies within a designed Strategic Gap (iii. Littlehampton and Middleton-On-Sea). The policy is to “prevent coalescence and retain the separate identity and amenity of settlements by maintaining and protecting the gaps between these settlements”.

The policy wording does not preclude all and any development within the Gap, indeed many developments of residential and commercial forms have been approved, but rather it seeks to ensure that the principles behind the gap are protected. “*New development in the gap will therefore only be permitted if:*

- (i) it is demonstrated to be necessary to meet the requirements of, or is consistent with, other policies of the Development Plan; and*
- (ii) it would not compromise, either individually or cumulatively, the objectives and fundamental integrity of the strategic gap; and*
- (iii) attention is given to the long-term enhancement of the landscape, amenity and conservation value within the gap and, where possible, to the improvement of public access.”*

Taking each of these in turn:

- i.) The development is, as a much-needed form of Older Persons housing, entirely necessary in order to help the LPA meet its housing delivery requirement. Furthermore, as a sustainable location for development, and is also entirely consistent with other not out-of-date policies of the Development Plan;
- ii.) The appended LVIA demonstrates that the site does not perform a significant role in the objectives of the Strategic Gap, and the form of development proposed would not harm the fundamental integrity of the gap due to its minor adverse impact. As the site is so well contained, its development would not give rise to cumulative harm either;
- iii.) The appended Landscape Master Plan provides a comprehensive planting and maintenance schedule to bolster the site's landscape setting, whilst the quality of development itself will lift the overall character of the immediate environs of the site.

Therefore, in each of these respects the proposed development fulfils the criteria for maintaining and protecting the Strategic Gap.

Policy AREA 10 also states that all development in the Gap will be subject to the most rigorous examination. Para 2.23 clarifies that this will *“include an assessment of the type of use, the proposed level of activity, the scale of the proposed buildings, the impact on the surrounding environment in terms of contributing to the coalescence of settlements and the reduction in openness of the strategic gap.”*

Taking each of these criteria in turn also:

The proposed use (C2) is desperately needed in this area, as evidenced by the appended Independent Assessment of Need;

The level of activity, in terms of traffic generation is very small, as evidenced by the appended Transport Statement;

The scale of the building is the minimum required in order to achieve a viable and affordable solution for Charitable Trust operators, whilst meeting best practice and contemporary standards regarding room sizes and communal areas.

The appended LVIA demonstrates that the impact on the surrounding environment, when viewed by public vantage points, is extremely limited, with the site being viewed in the context of existing built form to the north and south of the site and screened from wider views by the mature treelines to the north of the A259 and west of Climping Street. The development would not therefore either physically or visually contribute to the coalescence of Littlehampton with Middleton-on-Sea, as it extends neither east or west toward the two settlements.

The building footprint measures less than 2,000sqm and therefore equates to just **0.06 %** of the Gap. The site currently contributes very little to the openness of the Gap as it is contained on all four sides by either buildings or mature vegetation and has a strong sense of enclosure. Furthermore, the site is not, unlike surrounding land, in agricultural use, but rather consists of a Dog Training Centre and Farm Shop access and external storage areas, with various outbuildings and portacabins. Thus, it already has a ‘developed’ feel to it and contributes very little to the openness of the gap between the settlements and along the undeveloped coastline.

The above serves to demonstrate that the proposed development will pass the scrutiny of the most rigorous examination.

Therefore, the proposal has been shown to be in accordance with the Strategic gap policy AREA 10 and is therefore not a departure from the Development Plan. Furthermore, in terms of the Weighted Balance, any harm resulting from the proposed

development's impact on the Strategic Gap clearly doesn't significantly and demonstrably outweigh the benefits.

However, should there be any doubt in this regard, all relevant Saved and up-to-date policies are examined below against the context of the proposed development.

Employment

Policy GEN 6

The proposal will assist in meeting the councils' employment requirement and objectives outlined in the emerging local plan by *"increasing, diversifying and improving the quality of employment within the District"*. Independent research has shown that 1 job is created per bedspace for C2 residential institution (therefore 64 WTE jobs).

Design

Policy GEN 7

States that development will only be permitted where it exhibits a high quality of design and layout, and requires planning submissions to include a review of the proposal in its surroundings. This Statement, together with the accompanying Design and Access Statement fulfil this.

The proposal provides high quality design both internally and externally, and is sensitively planned so as to respond positively to the characteristics of the site and provide an enhancement of the site from its current uses.

The accompanying suite of supporting information, including the Heritage Statement and Arboricultural Survey achieve each of the criteria laid out in GEN 7:

- i) makes efficient use of land or buildings;*
- ii) demonstrates that it responds positively to the identified characteristics and resources of the site and the area to create attractive places and spaces with the needs of people in mind and respects and enhances local distinctiveness;*
- iii) promotes sustainable development, including the effective use and conservation of energy and reducing the need to travel, particularly by private car;*
- iv) does not have an unacceptable adverse impact on adjoining occupiers, land, uses or property and, where relevant, facilitates the development of adjoining sites;*
- v) takes account of any unacceptable adverse impacts that may arise from adjoining land uses or property;*
- vi) retains significant open or wooded areas which, in their own right, make a material contribution*



- to the local environment;*
- vii) allows for the safe movement of pedestrians and vehicles, giving priority to pedestrians;*
- viii) provides for vehicle parking in accordance with Policy GEN12.*

Flood Risk and Drainage

Policy GEN 9

The site lies within Flood Zone 1 and the accompanying Flood Risk Assessment and Drainage Strategy demonstrates that the design complies with these policies. Surface water discharge from the site will not increase, and a SUDS system is proposed.

Parking Standards

Policy GEN 12

Appendix 2 establishes maximum parking standards, but states that the Council will accept lower standards in sustainable locations. These parking standards do not specifically include C2 development, however does look at care home for the elderly classed under C3. Using these standards our development would require 25 spaces. Our provision of 28 on-site spaces goes above and beyond these standards.

The site is integrated into the wider existing transport network, benefiting from excellent road links along the A259 and bus stops within walking distance along the A259.

The appended Transport Statement (TS) demonstrates how the proposed access arrangements will allow for safe access by all users including emergency and refuse whilst residents and visitors with mobility problems can be dropped close to the entrance of the proposed Dementia Care Centre.

The TS concludes that the proposed site access can accommodate the additional traffic associated with the proposal and notes that the scheme will have no discernible impact on the operation of the local highway network.

Disabled persons

Policy GEN 17

The proposed development is entirely compliant with the needs of disabled persons and the impaired and is indeed purposely designed to enable ease of movement around the site and building.

Air, Noise and light pollution

Policies GEN 32, GEN 33 and GEN 34

These Policies seek to ensure that new developments do not result in any unacceptable pollution by way of noise, light or air pollution, and that sensitive development is appropriately planned.

The proposed development will be a good neighbour to adjoining residential and commercial uses, and is suitably located such that residents will have sufficient privacy and serenity, yet be able to benefit from seeing day-to-day activity around them.

Older Persons Care Accommodation

Policy DEV 21

This is the sole Policy within the Adopted Local Plan relating to this type of development and it really only relates to the restriction and relaxation of occupancy age restrictions in care homes.

Emerging Arun Local Plan 2011 - 2031

The emerging Local Plan and supporting documents were submitted for independent examination to the Secretary of State for Communities and Local Government on 30th January 2015. Following this, the Plan is currently at Main Modification stage following the examination in public at the end of 2017.

Due to the fact that the development plan document has yet to be Adopted its policies hold reduced weight in decision making, but relevant policies are reviewed below, against the proposed development.

Local Plan Main Modifications 2018

Sustainable development

Policy SD SP1

This states that “*When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework*”.

As indicated above, the proposed development is in a sustainable form, being accessible via a range of transport modes and much needed, delivering significant social and

economic benefits, whilst minimising any adverse environmental impacts.

As the Council cannot demonstrate a 5-year housing land supply, paragraph 49 of the Framework applies, and engages the Presumption in favour of para 14.

SD SP1 continues, to state that the Council “*Will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland)*”.

Since the initial pre-application advice received, we have worked hard to address negative comments concerning the perceived scale and massing of the building, in order to find a solution to the urgent need for Older Persons care accommodation in the district (particularly specialist dementia care within the Littlehampton and six villages area).

We have been unable to interact further with Officers during this pre-application stage but have engaged fully with Clymping Parish Council and members of the public (as evidenced in the accompanying Statement of Community Involvement). It is hoped that a positive approach with Officers will emerge once the application to which this Statement relates has been validated and registered.

Policy SD SP3

This Policy broadly replicates Adopted AREA 10, in defining ‘Gap between settlements’ and removing the distinction between Strategic and Local Gaps.

The application site is situated within the Littlehampton and Middleton-On-Sea Gap where “*Development will only be permitted within the gaps if:*

- i) It would not undermine the physical and/ or visual separation of settlements;*
- ii) It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development;*
- iii) It cannot be located elsewhere;*
- iv) It maintains the character of the undeveloped coast and;*
- v) If a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.”*

These criteria follow the wording of the AREA 10 policy very closely, but do not restrict development per se. The only new criteria is that the development ‘cannot be located elsewhere’ – in this regard the charitable trust nature of the intended operator is such that, much like affordable housing providers, they cannot compete with residential land values. A countryside location, outside the built-up area boundaries, is therefore required

in order to render a proposal as viable and deliverable.

Given the sustainable nature of the site, and the specific need for the form of development proposed, it is considered that the proposed development would not undermine this policy.

Countryside

Policy C SP1

Restricts most forms of development including housing from countryside locations (defined as land outside built-up area boundaries). Given the lack of 5-year housing land supply this Policy is out of date as it restricts housing development from such locations.

The policy continues, to state that the Council “*Will take into account cumulative impact of development in the consideration of planning applications.*” The proposed application site is extremely well contained by mature trees and has a strong sense of enclosure and is therefore self-contained.

Housing development is proposed to the south of Horsemere Green Lane (Appeal Ref:APP/C3810/W/17/3187601) which was refused, albeit recommended for refusal. If consented either at Appeal or through the submitted revised planning application (CM/13/18/OUT), this would provide an opportunity for pedestrian links to be made into the site and furthers the opportunity for local residents to walk to work in the Dementia Care Centre. This appeal/application site is within the emerging Local Plan allocated for 300 dwellings under Policy SD10.

Policy C SP1 also intends “*To ensure better management of the rural-urban fringe in those areas where significant new development is proposed, early consideration will need to be given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes*”.

Were the Appeal referenced above to be allowed, the application site would become an edge-of-settlement location, although due to the extent of built form surrounding the site it already has a ‘rural – urban fringe’ sense of place. Whilst the scale of development proposed, both in terms of floorspace and traffic generation, is not significant, the forethought put into the landscape design as evidenced in the accompanying documents will serve to ensure that the proposal responds sensitively to its location and enables public enjoyment of the surrounding coastal countryside to remain undisturbed, whilst meeting critical social needs.

Employment

Policy EMP DM1

This states that planning permission outside the built-up area boundary will be granted for local firms, currently located within the District. Our scheme fulfils each of the following criteria under EMP DM1 (6. Economic Growth outside the Built-up Area Boundary) through:

- a) There are no alternative sites for the form of development proposed;
- b) The development does not intensify use at the site to the detriment of the surrounding public access routes and highways;
- c) The scheme and site layout has been designed to a high standard utilizing best practice for dementia care;
- d) The site is well served by public transport as outlined with the Transport Assessment;
- e) Site access and parking provision are in accordance with the Council's adopted standards (see below for detail)
- f) The site layout has been designed to be sympathetic to surrounding area and is considerate of the landscape, habitat, built and historic environment;
- g) Suitable landscaping has been provided on site (please see submitted Landscape Plan);
- i) A Satisfactory relationship with the adjacent built form to protect the amenities of local residents (the Heritage Assessment confirms this);
- j) Where appropriate, Crime prevention measures have been incorporated into the design (not necessarily applicable);

Therefore, the scheme can be considered in accordance with policy EMP DM1.

Housing

Policy H DM2

This Policy specifically relates to older persons care accommodation, including Care Homes. The supporting text (12.6.1) recognises that: *“Arun has one of the highest older populations (people aged 60+) when compared to other local authority areas within the County. Comparatively speaking, Arun also has a low proportion of people aged under 45 living within the District. Life expectancy in the District is high with females having one of the highest life expectancies in the County at approximately 83.5 years which is higher than England at just over 82 years. Men on the other hand, have a slightly lower life expectancy at almost 79 years, which is higher than England ...”*



This recognition of the age profile of the District is welcomed, as is the Council's statement that it recognises the need to support developments seeking to care for the older persons population:

“Having regard to the age profile of the District, the Council recognises the need to support the provision of continuing care facilities for the elderly which may take the form of any of the following: Own homes (designed to meet the needs of the elderly) Sheltered housing; Day care facilities; Nursing homes; and Specialised care units.”

It is essential that care facilities are located close to community and social facilities in order to ensure that older people can continue to be an integral part of existing communities. Facilities should be easily accessible for residents, employees, visitors and service providers. A travel plan would form an important part of any planning application for care facilities.

Whilst this text acknowledges the role that Nursing Homes and Specialist Care facilities play in the care of older people, it doesn't specifically refer to Dementia Care, which is a specialist form of care for people with often lower mobility and independence, for whom their community is the Care Centre itself rather than the local area.

Therefore, whilst it is of course essential that new Dementia Care facilities are accessible to employees, visitors and service providers, it is not nearly so relevant for residents. HMT Care Centres therefore provide a 'street' of communal facilities within the centre which provide destinations for residents, and serve to provide the everyday 'High Street' or 'village centre' facilities such as a hair salon, pub/café, cinema lounge etc.

Policy H DM2 states that: *“New and extended independent living and care homes will be permitted where applications can demonstrate the following and where the proposal is consistent with all other Local Plan policies:*

- 1. The scheme is located within the Built Up Area Boundary if it is a new facility.*
- 2. The scheme shall be easily accessible either by foot or public transport, to community and social facilities e.g. shops, post offices, healthcare, community facilities*
- 3. The design of the scheme shall be such that it can be easily adapted to the varying needs of the users of the scheme*
- 4. The design and scale of the scheme shall be appropriate to the local context*
- 5. Amenity space shall be provided*
- 6. Overall, the scheme should be located where it would support and encourage the continuation of a healthy, active lifestyle.”*

This proposed policy is particularly disappointing, in restricting development of such



facilities to within the urban areas, as charitable trust operators can seldom compete with residential land values, and have a lower density of development than C3 housing. It is also not necessarily the case that a suitable site need be within the urban edge in order to be sustainable.

Given the lack of housing land supply, including older persons care, the proposed Policy H DM2 is considered out of date as it directly restricts the supply of facilities such as the proposed. In all other respects however the proposed development accords with the proposed Policy – it is easily accessible, flexibly designed to accommodate a range of older persons care needs, of appropriate design and scale to its surroundings, provides generous amenity space and would support and encourage a healthy and active lifestyle for staff, who would have the option of taking a sustainable form of transport to the site, and make linked trips with a walk along the seafront via local footpaths.

Design

Policy D SP1

This is the Council's main proposed design policy, requiring all new developments to: *“Make efficient use of land and reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness and usability, health and wellbeing and climate change mitigation); and the influence these objectives have on the form of the development. All development proposals must reflect the efficient use of land, layout, landscape and its setting, density, mix, scale, massing, character, materials, finish, architectural details and nearby habitats of the site and local area.”*

The proposed development makes efficient use of land and the proposals have indeed been derived from a thorough site analysis and context appraisal (see accompanying LVIA, DAS, Heritage, Arboricultural and Transport Statements).

The proposal reflects the semi- rural location by being of limited height, utilising local materials and carefully responding to nearby buildings in order to maintain privacy and amenity, whilst local habitats are protected and improved (see accompanying Phase 1 and Phase 2 Habitat Surveys).

Policy D DM1

This proposed policy provides a raft of further, detailed design advice with 15 criteria against which all applications may be assessed. The accompanying Design and Access

Statement, architectural, landscape and highway drawings and perspective images demonstrate how the proposal has been designed with each of the 15 criteria in mind. Briefly however the development's compliance with these criteria can be summarised as follows:

- Character – the building makes the best use of land, being the optimum storeys;
- Appearance – the palette of materials have been chosen to reflect local architecture;
- Impact – the building is sited as far away as possible from the Grade 2 listed Cottage;
- Innovation – the design is derived from Stirling University's dementia care best practice scheme and is highly innovative with regard to the private residents areas;
- Adaptability – the building is purposefully designed to cater for a range of care needs falling within the 'dementia care' umbrella term;
- Crime Prevention – the building offers natural surveillance over the grounds with windows overlooking all corners of the site which will itself be very secure;
- Trees and woodland – All trees on the boundaries of the site are being retained;
- Solar gain - the roof features photo-voltaic panels and a sedum roof;
- Public realm – the public parts of the premises – where visitors will attend, are designed to be welcoming and attractive;
- Layout – movement – pedestrian access to the site is to be improved by new footways linking to bus stops within walking distance of the site;
- Layout – legibility – the grounds are purposefully designed to aide residents' connection with the outdoors, with circular paths and interactive areas;
- Public Art – the care centre will feature several themed areas to promote memory retention for residents, whilst the entrance foyer will incorporate pieces of art;
- Density – the building footprint is designed so as to reduce the apparent visual mass of the premises, with splayed corridors and a stepped approach to elevational treatment and roof design.
- Scale – whilst larger than the most local buildings, the proposed care centre will be of a substantially higher quality design than the neighbouring Farm Shop;
- Aspects of form and design quality – the accompanying Design and Access Statement demonstrates how the development accords with the principles of the Council's Design guide.

Energy Efficiency

Policy ECC SP2

Sets out the council's proposed energy efficiency policy, requiring all major developments to be energy efficient and produce 10% of their energy requirements from renewable or low carbon on-site generation. The proposed development would achieve these aims.

Transport

Policies TSP1 and T DM1

Requires car parking in accordance with West Sussex guidelines, and all developments to reduce the need to travel and be accessible by alternative forms of travel. The proposed development is within walking distance of regular bus services which already suit the shift patterns for staff, and likely visitor opening times.

New pedestrian footpath links to the bus stops and thus also to the new cycle way are proposed, meaning that the site will be accessible by cycle and on foot from not just the local villages but also from Littlehampton itself.

Heritage

Policy HER SP1

States that heritage assets including listed buildings will be conserved, and development likely to prejudice this will be refused. As demonstrated within the accompanying Heritage Statement, the proposed development will have a non-significant impact upon the Grade 2 Listed Cottage by virtue of the application site not being within the setting of the said dwelling, and also as a result of the sensitive design.

Policy HER DM1

The attached Heritage Assessment shows that the development is compliant, showing that the development site makes a neutral contribution to the setting of the Grade II listed 'The Cottage'.

Ecology

Policy ENV DM5

The proposed development complies with the principles of this policy, as it shall result in

a net gain in biodiversity and protect existing habitats. The Council's biodiversity checklist has been completed and phase 2 surveys for bats, reptiles and Great Crested Newts (GCNs) have been completed. GCNs were found in the pond adjacent the site's western boundary and therefore a mitigation strategy has been produced.

Pollution

Policy QE DM1

A noise survey has been completed and confirms that the site is satisfactorily located with regard to noise – which is principally from the A259. No mitigation works were deemed necessary.

Policy QE DM2

An external lighting plan and strategy has been developed for the site, in order to demonstrate an appropriate balance between secure and safe wayfinding, with low level impacts upon the wider countryside.

Policy QE DM3

The site's accessibility has been assessed within the accompanying Transport Statement with regard to its proximity to public transport, walking and cycling routes.

Flood Risk and drainage

Policies W SP1, W DM2 and W DM3

As the site is outside the Flood Plain (Zone 1) development of the site accords with these policies. The proposed foul and surface water arrangements as set out in the accompanying Flood Risk Assessment and drainage strategy also incorporate a Lidsey Foul Water Catchment Area analysis and demonstrate why a Land Engineering Report is not required.

Supplementary Planning Documents

The only SPD of relevance to the proposed development is the Parking Standards (Oct 2000). The development includes 28 parking spaces, which is above the requirements within the Parking Standards SPD which states a requirement of 0.33 spaces per unit ($0.33 \times 64 = \text{approx. } 22 \text{ spaces}$).

Alongside this West Sussex County Council have produced and updated their own parking standards for C2 use. Follow these the requirement of a 64 bed Care Centre is 25

spaces plus service vehicle parking therefore the proposed development complies.

Clymping Neighbourhood Plan

The Neighbourhood Plan (NP) was formally adopted on 13th January 2016 covering the village of Clymping and the surrounding countryside towards the south coast. This document covers 4 key themes and objectives ranging from:

- Community, Leisure and Wellbeing;
- Employment and Tourism;
- Environment, Sustainability and Design;
- Roads and Transport.

As stated within Chapter 4 (National Planning Policy Context) the neighbourhood plan is up-to-date by virtue of the fact that it does not restrict development or look to allocate sites for housing. Therefore, several policies within the NP are relevant to this application and have been taken into account within the planning and design of the proposal. However, no reference is specifically made to C2 older persons care accommodation, therefore it is silent on this matter, and makes no proposals nor allowances for this form of development.

Through a range of pre-application consultation with Clymping Parish Council, we have worked heavily on the design of the proposed building to ensure a high-quality design to accord with the policy CPN 11 (quality of design) within the Clymping Neighbourhood Plan.

Conclusion

Due to Arun District Council (ADC) not being able to demonstrate a 5-year supply of housing, ADC consider policies GEN2 and GEN3 not in accordance with the Framework, limited weight can be given to them and by virtue of these being relevant policies that are out-of-date, Paragraph 14 is engaged, therefore the application should be considered against the presumption in favour of sustainable development, i.e. the Weighted Balance is triggered, as the proposal falls within the definition of Housing.

The harm resulting from the development must significantly and demonstrably outweigh the benefits, and such harm can only be tested up-to-date development plan policies.

The proposal is compliant with all Saved Policies of the Adopted Local Plan, including AREA 10 regarding the Strategic Gap, whilst only limited weight can be afforded to the Emerging local plan policies as this is only at Main Modifications Stage. Again, the

proposed development accords with the vast majority of Emerging Policies, save for any perceived harm to Policy SD SP3 concerning the Strategic Gap.

The following chapter now assesses the Material Considerations weighing in favour of the application, before the Weighted Balance is applied and conclusions are drawn.



7 Material Considerations

An overriding Need

The current provision and planned supply, together with the existing and proposed need figures have been analysed within our supporting Independent Assessment of Need by industry experts, Carterwood Ltd.

The relevant policy documents covering older persons housing need within West Sussex and Arun District have been analysed below:

Updated Housing Needs Evidence, Arun District Council – GL Hearn, September 2016

The GL Hearn report forms the basis of the evidence on housing needs for the Arun District Council Draft Local Plan 2011-2031. The report details the Objectively Assessed Need for housing in Arun District, including the required Older Persons Housing provision.

The report states that the population of older persons is expected to grow significantly over the plan period, and *‘a growing population of older persons, particularly for those aged in their 70s, 80s and above is projected to result in an increased need for specialist accommodation for older persons’*.

Arun District’s largest growth in population is in the 65+ age group, with a projected increase of 55% from 2011 to 2031. The population 85 and over projected to grow by an even larger proportion, 77%.

Regarding specialist provision in particular, the report projects that *‘there is a need of 991 residential care/nursing home bedspaces’* of C2 accommodation, the need of which is separate from the need for extra care/ sheltered housing, which is additional and falls under the C3 use class. GL Hearn specifically mentions that there needs to be recognition that *‘there may be additional need for particular groups such as those requiring specialist nursing, or for people with dementia’*.

West Sussex Joint Strategic Needs Assessment 2014 (JSNA)

The West Sussex JSNA identifies that the population of West Sussex is growing and ageing, predicting that *‘over the next ten years the overall population is projected to increase by approximately 8%, with far higher increases projected in older age groups’*.

The document goes on to state that *'within the next 5 years, the number of 65+ year olds is projected to increase by 10%'* and in the core age group of 85+ a 16% increase is projected. *'Longer term planning needs to build in higher increases in the 85+ age group; with an acceleration from 2019 onwards'.*

The Annual Report of the Director of Public Health and Wellbeing 2009/10 notes the variation in the age structures of each local authority, with Arun District having the most residents aged 65+ in West Sussex.

Further statistics estimate that there will be an 18% increase in the 85 age group between 2019-2024, moving to a 20% increase in the same age group between 2024 and 2029.

Dementia need

One of the issues with an ageing population is an increase in the prevalence of health issues, particularly dementia.

Dementia is an umbrella term which is used to describe a range of progressive neurological disorders, the most common of which is Alzheimer's.

The West Sussex JSNA states that *'currently it is estimated that there are 13,500 people aged 65 years living with dementia in West Sussex, applying current prevalence assumption to projected population it is estimated that this will rise to 20,300 within 15 years.'*

The Dementia Framework West Sussex 2014-2019 reiterates the high prevalence of older people living with dementia and states that *'this growth is happening at a time of significant reductions in public sector funding and we need to develop new ways to support people to live well with dementia'.*

The Dementia Framework details that one third of people with dementia live in residential care, and about two thirds of people who live in care homes have dementia. The framework goes on to state that within West Sussex the level of dementia provision differs noticeably by district across West Sussex.

The Carterwood Independent Assessment of Need submitted in support of this application has assessed the need for additional dementia 'Market Standard' beds in Arun District, the market catchment of 5 miles and within the local catchment area of 2.5 miles.

Carterwood assess the need by looking at the current supply, planned provision (consented planning applications), and population demographics and utilise the industry standard LangBuisson Age Standardised Demand tool.

PLANNING STATEMENT

The results are summarised in the table below:

112 Predicted demand for additional dedicated dementia elderly beds (2019)				
Demand	Ref.	Market catchment area	Arun District Council	Local catchment area
Total demand	-	1,453	1,847	406
Estimated need for elderly dedicated dementia care home beds		863	842	185
Supply				
Current supply of elderly dedicated dementia market standard bedrooms	1	252	252	47
Dedicated dementia beds pending decision	2	0	75	0
Dedicated dementia beds granted permission but not under construction	3	34	100	4
Dedicated dementia beds granted permission and under construction	4	42	42	0
Total planned and existing dedicated dementia market standard beds	-	328	475	51
Balance of provision				
Estimated shortfall including all planned dedicated dementia beds (Supply equates to the sum of references 1, 2 3 & 4)	-	335	367	134
Estimated shortfall including dedicated dementia beds under construction (Supply equates to the sum of references 1 and 4 only)	-	309	548	138
Sources: Census 2011 population statistics, A-Z Care Homes Guide January 2018, LaingBuisson, Barbour ABI, EGi, relevant planning authorities.				

The table above clearly shows that in each catchment area there is a significant need for dementia specific accommodation. Within the smallest catchment of only 2.5 miles from the site there will be an undersupply in 2019 of 138 beds, rising to 369 in the market catchment of 5 miles, and increasing again in the local authority catchment to an undersupply of 548 beds.

Carterwood have looked at the absolute best case scenario regarding planned provision, and at the very least, assuming all planned beds are constructed ready for occupation by 2019, and in the smallest catchment of only 2.5 miles, there will be an undersupply of 134 beds in 2019.

This independent research shows that there is a clear need for specialist dementia care beds, and in order to meet that need we must act now.

The benefits of our solution

The proposed development comprises a 64 bed dementia care home set over 1.5 storeys to minimise impact on the surrounding area. The operator requires the development to be of 64 beds in order to maximise nursing efficiencies, and reduce staffing costs (which form the majority of the homes expenditure) enabling the operator to keep the weekly rental costs to the residents at a reduced level.

We have keen interest from an experienced, not-for-profit, charitable trust, CQC



BRACKLEY

registered operator who are yet to have a presence within the County, but who are keen to expand and invest in meeting this need within Arun District.

The proposed development would provide many benefits through the proposed operators commitment to delivering best practice in dementia care in the form of the University of Stirling Gold Standard. The scheme is designed in the form of households of 8 en-suite bedrooms with associated communal facilities such as living room, dining room and household kitchen in order to appear to be a more domestic scale and instil a sense of community for the residents. Further details around the design of the home can be found in the accompanying Design and Access Statement.

The specialist Dementia Care Centre will provide accommodation and care for 64 residents of all ages, however the average age of entry to a care home of this type will be 85 years old, with an average length of stay between 18-24 months.

Benefits of the scheme include freeing up both family homes and extra care/assisted living apartments, providing choice of care for local residents and their families, reducing pressure of GPs and particularly reducing the potential number of bed-blockers in hospitals - whose care can be better dealt with in a specialist environment set up for that purpose. The site is easily accessible to staff, being both on bus route with a frequent service running at times to suit shift handovers, and on a new cycle route, with cycle parking and shower and change facilities included within the home.

The site's setting, being less than a mile from the beach, affords visitors the opportunity to take loved ones down the road for a breath of sea air, or alternatively on a visit to the adjacent farm shop and café.

Social benefits

- Purpose built care accommodation at a local level negating the need for residents to move out of their locality in their final years
- Providing choice of care accommodation – thereby keeping the self-funders market competitive
- Provision by a not-for-profit charitable trust, keeping costs reasonable
- CQC registered specialist care designed to best practice standards
- Flexible accommodation to meet a range of acuity
- Freeing-up of C3 family housing
- Reduces hospital admissions through provision of appropriate accommodation
- Frees up hospital beds by providing appropriate social care beds
- Reduces social isolation and promotes independence for residents

Economic Benefits

- Direct employment – c.60 WTE jobs with a mixture of skilled professional and un-skilled jobs
- Indirect employment opportunities through out-sourcing of services provided at the care centre
- Supports the rural economy – local cafes, restaurants, hotels and guest houses and shops through the expenditure of staff and visitors
- Construction jobs both direct and indirect through supply chain

Environmental Benefits

- Local facility reduces the need to travel for visitors and staff residing in the six villages in particular
- New strategic planting to supplement hedgerow gaps
- Biodiversity enhancements through ecological mitigation and sedum roof
- Enhancement of local built form architecture
- Demolition of outbuildings and detritus surrounding Farm Shop
- Improved site drainage and reduced risk of flooding
- Extremely limited extent of Gap lost (0.061 %).

The above considerations combine to constitute compelling material considerations which should be afforded substantial weight when compared against any perceived harm resulting from the development.

The following section will now balance and weigh these considerations.

8 The Planning Balance

The Town and Country Planning Acts dictate that applications must be determined in accordance with the Development Plan unless Material Considerations dictate otherwise. The National Planning Policy Framework (The Framework) is itself a weighty Material Consideration, and as set out above Paragraph 14 of the Framework is engaged in the determination of the application to which this Statement relates.

Thus, this application falls to be determined in accordance with the ‘Weighted Balance’, whereby **the harm resulting from the development must significantly and demonstrably outweigh the benefits** in order for planning permission to be refused.

The previous Chapter set out the benefits of the scheme as both substantial and extensive, whilst the harm, as set out in Chapter 5 is very limited.

The reasons for this assertion are detailed below and are even more clear-cut than in the recent Appeal Decision BE/77/16/OUT (APP/C3810/V/17/3166900) which allowed an application for up to 50 dwellings to be developed within the Angmering – Worthing Strategic Gap by virtue of the housing land shortage, employment benefits and the ‘*small percentage of gap lost*’ (0.3%) (I.R para 9.10).

The proposed development is not merely open market housing which (however desperately needed with regard to Arun’s land supply) could be sited anywhere within the District – it constitutes an urgently needed and specialist form of Dementia care to be delivered to meet an identified local need by a charitable trust who cannot compete with prime residential land values even if a suitable size of sufficient size were to be available.

Thus, the weight given to this social need must be substantial. Further significant weight should be added to the numerous benefits listed in the previous chapter – covering social, economic and environmental strands of sustainability.

In contrast the weight to be afforded to the harm to the Strategic Gap accruing from Adopted Policy AREA 10 is moderate at worst given the limited physical extent of the gap to be lost through the development, and the minimal landscape visual impact resulting from the carefully designed proposal.

Even assuming full weight were to be given to Policy AREA 10, it doesn’t preclude all development, only that which harms the integrity of the gap, and thus for the reasons stated above the proposed development complies with this Policy.

With regard to the application site’s location outside the built up area and thus within the

countryside, it has already been established that both Adopted policies GEN 2 and GEN 3 are out of date. The proposal is also in accordance with all other Development Plan policies therefore there is no other harm pertaining to the proposed development.

Conclusions

The proposed development constitutes sustainable development, being sited in a location that is accessible by a range of transport modes, meets an objectively assessed social need and offers significant economic benefits.

The proposed development is a form of housing, is supported by the local community and is of a high design quality which results in a minimal visual and physical impact in terms of its strategic gap designation.

Given the status of the housing land supply within Arun, the paragraph 14 of the Framework is engaged, which states that sustainable development should only be refused if the resultant harm both 'significantly' and 'demonstrably' outweighs the benefits.

The only harm generated by the proposal is minimal in landscape terms, when the developed site would be viewed from selected public vantage points to the east of the site, and even then, it would be viewed in the context of surrounding development.

The proposed scale of development is only what is necessary to enable a viable development in operational terms, and limiting the ridge height to 7.5m means that no part of the development will be visible from the countryside to the north or west.

Therefore, the proposal offers substantial benefits which far outweigh the limited harm.