

Former Poultry Farm, Land West of Yapton Road, Middleton on Sea, PO22 6DY

Planning Statement

on behalf of Frontier Estates

September 2020

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1.0 Introduction

- 1.1 This Planning Statement is provided in support of a Full Planning Application for a 66-bedroom care home (the proposal) at land West of Yapton Lane, Middleton on Sea (the Site). The application is submitted on behalf of our client, Frontier Estates (the applicant).
- 1.2 This application follows a recently refused application for a similar scheme at the site (application reference: M/80/19/PL). Despite the case officer recommending that planning permission was approved, the Planning Committee cited concerns relating to the scale and density of the scheme and its perceived impact on trees near to the entrance to the site. The reasons for refusal were as follows:
- (i) The proposals are considered to be an over development and adversely affect the visual amenities of the locality by virtue of them being out of character in scale and density in conflict with policies D DM1 and D SP1 of the Arun Local Plan and policies in the National Planning Policy Framework.
 - (ii) The use of the proposed access will result in damage to the protected Ash Trees by virtue of the proximity of vehicle movements to them, leading to their loss contrary to policy ENV DM4 of the Arun Local Plan.
- 1.3 The applicant disagrees with the decision that the Council made on that application and has exercised their right of appeal against it. The Council has been issued with the Appellant's Appeal Statement and at the time of writing, the Planning Inspectorate are seeking to appoint an Inspector to the case.
- 1.4 For the avoidance of doubt, this revised application is without prejudice to the ongoing planning appeal and the Appellant's case as described therein.
- 1.5 The purpose of this application is to seek to address the perceived policy conflicts identified by the Council in respect of the previous application, so as to potentially avoid the need to progress with the planning appeal, which will incur time and cost for all parties.
- 1.6 In summary, this revised proposal seeks to address the first reason for refusal by putting forward a scheme with a materially lower building, which has been achieved by the rationalising of space within the development and the introduction of a part basement level. There would be no accommodation

at roof level. This decrease in the height of the scheme would reduce its visibility and we hope will address concerns raised by the Council relating to the scale of the development.

- 1.7 The extract below shows the proposed south elevation, with the red dashed line denoting the height of the previous scheme:



- 1.8 Having regard to the second reason for refusal, since application reference M/80/19/PL was submitted, the applicant has lawfully implemented the extant planning permission that exists on the site (reference M/45/16/PL). This is for 13 dwellings and has the same access arrangements, and relationship with the protected Ash Trees near to the site as the previous scheme, as this proposal.
- 1.9 The current care home scheme would cause no harm to the trees in question, as is evidenced by the Arboricultural Report that accompanied the last application and is submitted again with this one. Nevertheless, it is recognised that the Council takes a different view.
- 1.10 However, the extant permission at the site has been implemented, and will be completed if planning permission is not secured for a care home scheme at the site. Even if those trees were to be damaged by the location of the road access (which the applicant says they would not be), that damage would take place in any event as a consequence of the extant permission being built out.
- 1.11 In those circumstances, it would not be reasonable for the Local Planning Authority to maintain its objection to a proposal at the site based on the protection of the Ash Trees because it has already granted planning permission for materially the same access arrangements.
- 1.12 For the avoidance of doubt, there is no reason to think that the development would cause harm to the protected Ash Trees in any of the extant, appeal, or proposed scenarios.
- 1.13 There we no further concerns raised by the Local Planning Authority relating to the previous scheme in its decision notice.

2.0 The application site and its planning history

The application site

- 2.1 The application site is 0.62 hectares in size and is positioned to the west of Yapton Road, immediately north of Silver Birch Drive.
- 2.2 It was formerly used as a poultry farm and contained a two storey dwelling in the south-eastern corner and various single storey outbuildings. The site was vacated in 2005 and has since fallen into disrepair. The vegetation is overgrown and we understand that the site attracted anti-social behaviour before it was secured by the applicant. Many of the structures associated with the poultry farm use have now been removed, but when in situ we understand that these had a combined footprint of approximately 1,130m². The site is predominately flat.
- 2.3 There are a number of mature trees adjacent to the eastern and southern boundaries. Three of the trees around the access to the site from Silver Birch Drive are covered by a Tree Preservation Order (reference TPO/M/1/15). These trees are referenced T4 (Ash), T5 (Ash) and T10 (Field Maple) in the Arboricultural Impact Assessment submitted in support of the application.
- 2.4 A public right of way (ref PROW 160) runs east to west along the south edge of the site linking Yapton Road with open land to the west. Parallel to the footpath is a watercourse.
- 2.5 The site is positioned adjacent to an established residential area within which the houses are predominantly two storeys in height. There are also commercial uses to the east (Middleton Business Park) and open land to the north and west.
- 2.6 It is within the designated Built Up Area of Middleton on Sea.
- 2.7 An extract from the submitted site location plan is below:



Figure 1: site location plan

The sustainable location of the site

- 2.8 The site is in a sustainable location, being within 700 metres of various facilities within Middleton on Sea including shops, commercial facilities, a church and medical centre. The site is well connected to the road network, with the A259 situated 500 metres to the north. There are bus stops within walking distance of the site.
- 2.9 The site falls within Flood Zone 1 (lowest risk of flooding) and there are no heritage constraints at or around the site.

Planning history

- 2.10 Planning permission was granted in February 2017 for the demolition of the redundant poultry farm buildings and dwelling and the erection of 13 dwellings with associated access, car parking and landscaping (Planning Ref: M/45/16/PL).

- 2.11 This approved and extant scheme includes a mix of 2, 3 and 4-bedroom houses including detached, semi-detached and terraced properties, each being two storeys in height. The approved built form is orientated such that it would be positioned adjacent to the eastern and northern site boundaries with an area of amenity space provided in the southern part of the site. A new vehicular access would be formed from the existing road spur off Silver Birch Drive to the south, in the same location as this proposal.

- 2.12 That planning permission has been lawfully implemented through various works of demolition. That commencement was facilitated by the approval of details submitted pursuant to condition 18 (Construction and Environmental Management Plan) on 31 January 2020.

- 2.13 An application for a non-material amendment to the extant scheme was submitted to the authority (reference M/29/20/NMA). That application was refused because the LPA considered that the amendments proposed were 'material'.

- 2.14 As described in the Introduction to this Statement, planning permission was refused on 6th February 2020 for demolition of the existing structures and redevelopment to provide a new 66-bedroom care home (Use Class C2) arranged over two storeys together with associated access, car and cycle parking, structural landscaping and amenity space provision under application reference M/80/19/PL.

- 2.15 That decision was made against the recommendation of officers, and for the reasons set out at paragraph 1.2 above.

- 2.16 This proposal is the same as that which was refused in February, but for the substantial reduction in height of the buildings at the site, which are proposed to seek to overcome the Council's concern in respect of the scale of the proposals.

3.0 The Development Plan and other policy and guidance

The Development Plan

3.1 Section 38 (6) of the Planning & Compulsory Purchase Act 2004 requires that, when making a determination under the Planning Acts, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Local Development Plan against which the proposals are to be considered comprises the Arun District Local Plan (2011-2031) as adopted in July 2018.

3.2 A list of relevant Local Plan policies is set out below:

D DM1	Aspects of form and design quality
D DM2	Internal space standards
D SP1	Design
ECC SP2	Energy and climate change mitigation
ENV DM4	Protection of trees
ENV DM5	Development and biodiversity
LAN DM1	Protection of landscape character
INF SP1	Infrastructure provision and implementation
SD SP1	Sustainable Development
SD SP2	Built-up Area Boundary
T DM1	Sustainable Travel and Public Rights of Way
T SP1	Transport and Development
W DM2	Flood Risk

W DM1	Water supply and quality
W DM3	Sustainable Urban Drainage Systems
H DM1	Housing mix
H DM2	Independent living and care homes
QE DM1	Noise Pollution
QE SP1	Quality of the Environment

Other material considerations

National Planning Policy Framework

- 3.3 The National Planning Policy Framework June 2019 (NPPF) sets out the Government's planning policies for England and how these should be applied.
- 3.4 Paragraph 10 of the Framework sets out a presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a. an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b. a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c. an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity,

using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 3.5 Paragraph 61 provides the overarching objective in promoting housing choice stating that ‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes’.
- 3.6 Older people are defined in the NPPF as ‘people over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs’.
- 3.7 Paragraph 118 promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, as is the case here.
- 3.8 Paragraph 124 encourages the creation of high-quality buildings and places stating that: ‘good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’. Paragraph 127 further states that developments should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping (criterion b), sympathetic to local character and history (criterion c), establish or maintain a strong sense of place (criterion d) and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users (criterion f).

National Planning Policy Guidance

- 3.9 The Planning Practice Guidance (PPG) supports the National Planning Policy Framework. The PPG now specifically addresses the need for older people’s accommodation in consolidated guidance dated 26 June 2019. In assessing how local authorities should address the need for older person’s housing, the PPG states that:

'Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan making through to decision-taking' (Paragraph 001).

3.10 The need to provide housing for older people is described in the PPG as 'critical' as people are living longer lives and the proportion of older people in the population is increasing.

3.11 The PPG acknowledges that there are different types of specialist housing designed to meet the diverse needs of older people which can include age-restricted general market housing, retirement living or sheltered housing, extra care housing or housing-with-care and residential and nursing care homes (paragraph 010).

3.12 The PPG further states that:

'Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people' (paragraph 006) and that 'innovative and diverse housing models will need to be considered where appropriate' (paragraph 012).

3.13 Having regard to local housing supply, the PPG categorically states that 'plan-making authorities will need to count housing provided for older people against their housing requirement' (Paragraph 016).

Supplementary Planning Guidance

3.14 Relevant supplementary planning guidance includes the following:

- The National Design Guide 2019
- The Middleton on Sea Village Design Statement
- Arun Parking Standards (2000)
- West Sussex County Council Guidance on Parking at New Developments (August 2019)

3.15 We note that the planning policy context at both the national and local level remains materially the same as at the time the earlier care home scheme was determined.

4.0 The Proposals

- 4.1 The proposal consists of a new 66-bedroom care home. This is the same number of bedrooms as within the previously refused scheme. The proposed site boundaries, site area and access arrangements from Silver Birch Drive are consistent with that of the extant housing scheme referred to above, and the recently refused care scheme.
- 4.2 The new care home would be registered with the Care Quality Commission (CQC) and would provide 24-hour support and care for the frail elderly, meeting a full range of residential, nursing and dementia care needs, including end of life and palliative services. The home would offer a continuing care pathway, where the long-term needs of residents can be met on one site as their care requirements may change. The average age of residents would be approximately 85 to 90 years.
- 4.3 As with any Care Home, residents would move in at the point at which their care needs have escalated and when they or their family/carers are unable to address these needs within their own home. The average length of stay of residents in nursing care would be 15 – 18 months and the average length of stay for residents in residential care would be approximately 2 years.
- 4.4 The scheme has been drawn up to meet the specifications and requirements of a leading, national care home operator and would be an exemplar in terms of the standard of facilities and the provision of support and care. The care home would exceed the space standards set by the CQC and would incorporate the following facilities and features:
- All bedrooms would be equipped with en-suite bathrooms designed for safety and accessibility;
 - 24-hour on site care provision;
 - Spacious communal and amenity spaces incorporating café/bar/lounge, hairdressers, cinema room, activity rooms, lounges, dining spaces and quiet rooms. Many of these facilities would be opened up for use by community groups to integrate the home with the local area and to provide a busy and vibrant atmosphere within the care home;
 - On-site kitchen and laundry;

- Staff facilities including lounge, training area and changing rooms;
- Landscaped amenity areas and sensory gardens; and
- Car and cycle parking as well as dedicated spaces for deliveries and ambulance.

4.5 Access into the site would be from Silver Birch Drive, utilizing the existing cul-de-sac between nos. 12 and 14 Silver Birch Drive. This access drive would lead to two car parking areas (beyond the retained trees) providing space for 29 vehicles. The access and arboricultural arrangements are the same as those of the approved, extant scheme, which has been lawfully implemented.

4.6 As described above, the proposals are substantially lower in height than the scheme that was refused in February and achieves this reduction through internal rationalisation and the introduction of a part basement. There would be no accommodation at roof level. The purpose of this reduction in scale of the building is to seek to address concerns that led to the Local Planning Authority refusing planning permission for the last application. The general ridge height of the revised scheme would be 8m above ground level. The recently refused level had a general ridge height of 9.6m.

4.7 The planning application is supported by the following material:

Plans and drawings submitted for approval	
2017/PA/001	Site Location Plan
2017/PA/002	Site Plan as Existing
2017/PA/004	Proposed Site Layout Plan
2017/PA/011	Proposed Ground Floor Plan
2017/PA/012	Proposed First Floor Plan
2017/PA/013	Proposed Roof Plan
2017/PA/020	Proposed Elevations Sheet 1
2017/PA/021	Proposed Elevations Sheet 2
2017/PA/002	Proposed Site Sections
2017/PA/025	Street Scenes Sheet 1
2017/PA/026	Street Scenes Sheet 2
2017/PA/10	Basement Plan Proposed
402.6594.00008.RC.002	Soft Works Plan
402.6594.0008_RC_001	General Arrangement Plan

Plans and drawings submitted for illustrative purposes only	
2017/PA/003	Site Plan (Footprint Comparison)
2017/PA/030	Site Survey
Supporting information	
Planning Statement	
Arboricultural Impact and Method Statements	
Statement of Community Involvement	
Design and Access Statement	
Care Needs Assessment	
Flood Risk and Drainage Strategy (including drainage plan)	
Ecological Impact Assessment	
Biodiversity Checklist	
Preliminary Land Quality Risk Assessment	
Site Investigation	
Transport Statement (including access and swept path plans)	
Draft Travel Plan	
Construction Traffic Management Plan (outline)	
Landscape and Visual Impact Report	

5.0 Planning considerations

5.1 In this section of the Statement we describe how the proposed development complies with the relevant policies of the development plan, with reference to the following material considerations:

- The principle of the development;
- Character and appearance
- Trees
- The relationship with neighbours
- Traffic and parking
- The environment
- Other material considerations

The principle of the development

5.2 The principle of development on the site has been established through the inclusion of the the large majority of the land within the Built-Up Area and through the site's recent planning history. Policy SD SP2 of the Local Plan states that new development is to be focused within the Built Up Area Boundaries and will generally be permitted, subject to consideration against other policies of the Local Plan. In responding to this guidance, all of the proposed built form will be contained within the defined Built-Up Area.

5.3 The proposed care home use is also consistent with the Council's policy objectives. Policy HDM2 of the Local Plan is of specific relevance and, in acknowledging that Arun has one of the highest older populations and highest life expectancies in the County, provides a positive context to the provision of new care homes, stating 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:

- a) The scheme is located within the Built-Up Area Boundary if it is a new facility.

- b) 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
- c) The design of the scheme shall be such that it can be easily adapted to the varying needs of the users of the scheme
- d) The design and scale of the scheme shall be appropriate to the local context
- e) Amenity space shall be provided
- f) Overall, the scheme should be located where it would support and encourage the continuation of a healthy, active lifestyle.

5.4 The proposal meets all of the criteria set out at Policy HDM2.

5.5 We note that the Council did not raise concern in respect of the principle of the development when determining the last application at the site and so it should be regarded as acceptable now.

Character and appearance

5.6 Policies D SP1 (Design) and D DM1 (Aspects of Form and Design Quality) seek to secure a high quality of new design in new developments within the District.

5.7 Policy D SP1 states that:

'All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details'.

5.8 The Council's concerns in respect of the design of the previous scheme related to a perceived overdevelopment and harm to visual amenity as a consequence of the scale and density of the proposal being out of character with the surrounding area. No concern was raised in respect of any other aspect of the character and appearance of the proposal.

5.9 Policy D DM1 provides further detail as to what the Council means when it says that the characteristics of a site and a local area should be reflected in new development in terms of scale and density.

5.10 It states that scale covers a number of areas, including:

- The height, width and length of a building or buildings in relation to its surroundings;
- The size of parts of a building or its details, particularly in relation to the size of a person; and
- The combined effect of the arrangement, volume and shape of a building or group of buildings in relation to other buildings and spaces.

5.11 The policy continues that 'when designing to the local character of building forms, patterns of development and the natural environment, the scale of new development should':

- Avoid obscuring public views, vistas and skylines;
- Ensure the height and massing does not interrupt or debase the rhythm of an existing building/roofline and overall streetscape, or detract from the local and wider area's character;
- Respect the existing scale in the detailing and composition of elements such as windows, doors etc.; and
- Have regard to the principle users of development schemes – people; so that buildings and infrastructure are scales for their maximum benefit and enhance their experience of the space.

5.12 Importantly, the policy is clear that:

'the form, building details and massing of a development...has the opportunity to enhance, add variety and local distinctiveness' and that:

'Development does not have to be restricted to exactly the same scale of the existing area, but it should keep within the general confines of the overall character' (our emphasis).

5.13 On density, the policy text sets out that 'built density can be expressed in terms of plot ratio; units or habitable rooms per hectare; site coverage plus the number of floors or a maximum building height; or a combination of these.'

- 5.14 It states that a design led approach to density can optimise the use of a site, achieve efficient use of land and ensure high-quality development sympathetic to the surrounding area'. Importantly, the policy states that:

This approach allows for higher densities in areas with good access to public transport and services or more central locations and that when considering density, thought should be given to proximity of activities, routes and public transport access (our emphasis).

- 5.15 There would be no conflict with policies D DM1 and DSP1 because the proposal has been carefully designed so that:

Scale

- The height of the development is restricted to a traditional two-storeys throughout to ensure that the proposal remains of a domestic character and respects the height of the adjoining houses. The height of the building has been substantially further reduced since the last application was submitted, so that it omits accommodation in the roof level. The general height of the ridge level would be 1.6m lower than the previous scheme. This is a meaningful reduction in height that would materially reduce the scale of the scheme overall.
- Whilst accommodating the care home within a single building (as is necessary for operational reasons) the proposal would have a domestic form by breaking down the elevations through the use of a staggered roof line, creating gaps within the roof form, providing set-backs and gable projections and offering variety in the palette of materials. These elements in turn help to reinforce local distinctiveness. In this way, and as with the approved residential scheme, the building would read as a series of inter-linking elements which form part of a coherent whole.
- Through the use of communal gardens and a sensitive boundary treatment, the proposal will make a positive addition to the street scene and will not read as a typical 'back of property' streetscape.
- The building incorporates a high-quality palette of materials that are reflective of the surrounding area including a stock brick and elements of render, art stone detailing and tiled and slated roofs.

- The scheme is to retain existing vegetation and to supplement this with new planting to help integrate the proposal into the street scene.

Density

- Large areas of the site have been given over to landscaping and open space to ensure a spacious character at the site;
- The building would be located along two edges of the site with gardens and car parking nearest to the entrance and neighbouring properties;
- A substantial landscape buffer is retained along the northern and eastern edges of the site, setting in built footprint from the edges of the site;

- 5.16 It is not appropriate to compare the density of standard housing with a care home scheme (either in terms of dwellings per hectare or habitable rooms per hectare). By their nature, care homes will include bedrooms that are substantially smaller than a standard dwelling and they will include a wide range of communal facilities for residents and staff that are not habitable. It is not the case that a 66-bedroom care home is the same as a 66 dwelling development.
- 5.17 The proposal has been carefully designed so that it makes an efficient use of this sustainable site, whilst ensuring that the balance between built development, open space and retained landscaping is appropriate to the character of the area.
- 5.18 Whilst the character of development on Silver Birch Avenue have been important design influence of the proposal, the site sits behind dwellings on the north side of that road and is heavily screened. Accordingly, it is not necessary for an acceptable proposal at the site to mirror the density or arrangement of buildings along the road. It is also important to note that the commercial buildings to the east, on the opposite side of Yapton Road have a different density and site arrangement, with larger footprint buildings set in large plots.
- 5.19 The appearance of the proposal could be regarded as an improvement when compared with the consented and implemented scheme at the site because of the reduction in the ridge height of the proposals. The general height of the proposals to ridge level is 8m and the taller north wing of the consented scheme is 9.3m.

- 5.20 The reduction in height of these proposals will materially reduce its scale when compared to the last scheme. It would be more akin to the scale of neighbouring residential buildings.
- 5.21 This application is supported by a comprehensive Landscape and Visual Appraisal prepared by SLR. They have forensically considered the landscape and visual effects of the proposal when considered against the baseline of the consented and implemented scheme for completeness.
- 5.22 On 'density' (which has been measured considering built form and hardstanding), the Appraisal demonstrates that the proposal is only 6.8% higher than the 'fall-back' scheme. It is, in fact, 6.3% lower than the density of existing residential of Silver Birch Drive
- 5.23 The Appraisal concludes that the potential visual effects of the proposal would be localised and moderate/minor on only the closet residents and this would reduce to minor effects in the long-term.
- 5.24 This is a high quality scheme, that will make a positive contribution to the character of the area. There would be substantial new landscaping and high-quality materials would be used. The scheme would comply with the Council's design policies.

Whether the proposal would result in harm to trees

- 5.25 Policy ENV DM4 states that 'development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order will not be damaged or destroyed now and as they reach maturity'.
- 5.26 An Arboricultural Method Statement has been submitted in support of the application, which identifies that the lowest limb of tree reference T4 would be removed and the crown of the tree should be lifted to 5m to ensure that there was no conflict with traffic using the access to the site.
- 5.27 Those works would be carried out strictly in accordance with best arboricultural practice and would not result in any damage to, or the destruction of the tree now or into the future. Once that minor work had been carried out, there would be no reason for traffic using the access to the site to interfere with either T4 or T5 in any way.

- 5.28 A directly comparable relationship was granted planning permission by the LPA for the extant residential consent at the site. In that case, the access road would have the same relationship with T4 and T5. An extract of the relevant plan for that planning application is shown below:

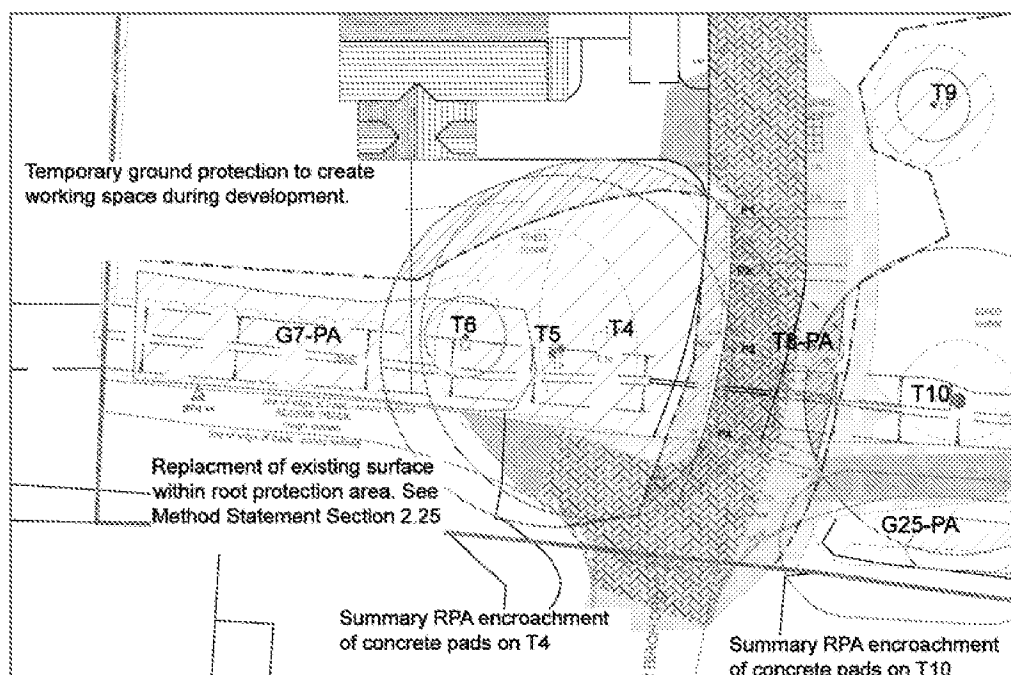


Figure 2: access arrangement for extant residential scheme at the site.

- 5.29 The extant permission at the site for the residential development has been lawfully implemented. That development will have the same effect on T4 and T5 as the proposed scheme. In both scenarios, no harm would be caused to the long-term health of the trees.
- 5.30 The Council's concerns at the time of the last application related only to the health of the two Ash Trees (T4 and T5) and not to any other trees at the site. The supporting report identifies that no harm would be caused to any other trees at or near the site.
- 5.31 The development would be consistent with Policy ENV DM4.

The relationship with neighbours

- 5.32 The proposal seeks to protect the amenity of nearby residents in terms of privacy, daylight/sunlight and sense of enclosure through the siting and orientation of the buildings (including the use of generous separation distances to the boundaries with adjoining dwellings) and the use of intervening

landscaping. In this regard, the care home will be set back from the boundaries and the orientation does not allow for any material sense of overlooking.

- 5.33 The care home will be positioned approximately 22 metres from the nearest residential property to the south. This element of the care home is designed as a flank elevation containing no windows to habitable rooms and is in any event separated by existing mature landscaping. The nearest facing windows are at a distance of over 55 metres.
- 5.34 Having regard to any potential for noise and disturbance, the car parking areas are set back a minimum of 10 metres from the shared site boundary (and over 20 metres from the nearest house) and the intervening space is again well-screened. The draft Travel Plan proposes a series of measures to allow for the effective management of car parking activities within the site.
- 5.35 No concerns relating to the effect of the proposals on neighbours were raised in respect of the last application and the scheme now proposed is materially lower than that one.

Transport and parking

Access

- 5.36 As noted above, the siting of the proposed access route from Silver Birch Drive will be replicated as per the approved residential scheme and a sensitive construction methodology is proposed within the vicinity of the protected trees. The proposal will offer safe access and egress for vehicles with fully compliant visibility splays. The width of the road will be 5.5 metres allowing for two vehicles to pass. The proposal also incorporates a safe pedestrian access into the scheme, with footpaths extending into the site and with appropriate signage proposed at the crossing with the public footpath. The Transport Assessment supporting this application demonstrates how the access arrangements will provide safe access and egress for all users including emergency/refuse vehicles.

Traffic Generation

- 5.37 As outlined in detail in the Transport Assessment, the level of traffic generation from the proposed care home use is not considered to give rise to any material impact on the road network in terms of capacity or highways safety when compared with the extant residential scheme. The overall number of movements and peak hourly movements are also comparable to the previously consented scheme.

Importantly, the timings of staff changeovers for the care home can be staggered to minimize any impacts at peak times.

Car Parking

- 5.38 With regards to car parking, provision is made for a total of 29 car parking spaces (which includes two disabled bays and six electric vehicle charging points) as well as an ambulance/delivery bay and cycle and motorcycle parking. The spaces are positioned within the site to provide safe and convenient access into the care home and are situated behind the frontage trees and within new areas of landscaping to ensure that the scheme is not car dominated.
- 5.39 The level of provision is considered to be appropriate for the nature of the proposed use and having regard to the operator's experience from other facilities in a comparable location. No residents will own cars and provision is therefore required only for staff and visitors. There are no resident staff and in a sustainable location such as this, it is anticipated that no more than 50% of staff would travel in their own cars.
- 5.40 With an estimated 20-25 staff on site at any one time, less than half of the parking provision would therefore be required for staff, with the remainder being available for visitors. Frontier do not envisage the need for more than 10 visitor spaces and therefore the level of provision includes an element of spare capacity for times of peak demand. Indeed, whilst the car parking numbers have been increased to reflect comments raised at the public consultation relating to potential pressures for parking off site, this is not has not arisen from an operator requirement.
- 5.41 The level of provision also accords with Arun's maximum parking standards (2000) which require 1 resident space per 20 bedrooms, 1 space per 8 bedrooms for visitors and 1 space per 5 bedrooms for staff. For a 66-bedroom home, with a maximum of 25 staff on site, this equates to a total of 25 spaces. At 29 spaces, the scheme includes a surplus of 4 spaces. The proposed car parking numbers are also consistent with those accepted on other recent care home schemes in the area, including an approved Frontier scheme in Angmering where the 70-bedroom care home included 27 spaces.
- 5.42 It is noted that West Sussex County Council issued Guidance on Parking at New Developments in August 2019 and that Arun consulted on its revised draft parking standards in July 2019. Neither document includes specific standards for care home developments. The adopted County Council

guidance instead promotes a site-specific assessment using trip rates and an assessment of shift patterns (as outlined above). The Guidance also advocates the provision of active' charging points for electric vehicles at a minimum of 20% of all parking spaces with ducting provided at all remaining spaces where appropriate. The subject scheme makes full allowance for this.

5.43 The applicant has also prepared a Travel Plan for the care home use to outline the strategies and measures that would be implemented in order to discourage single occupancy car use and to promote sustainable travel. These measures include:

- The provision of information and advice concerning safe pedestrian and cycle routes to the site
- The provision of shower, changing and locker facilities
- The provision of secure cycle parking facilities
- The prominent display of up-to-date public transport information in communal areas
- Encouragement of car sharing schemes
- Advertising the health benefits of walking and cycling through promotional material
- Holding a 'cycle to work' day to promote cycling ahead of driving
- Monitoring success against benchmark travel surveys undertaken when the care home is first fully occupied

5.44 To restrict the possibility of on-street car parking and to protect the amenities of the area the applicant accepts a condition that all the proposed car parking spaces be made available prior to occupation of the new home.

5.45 No concerns were raised by the Local Planning Authority in respect of transport and movement matters when the last application was submitted and these proposals are the same.

The environment

Flood risk and drainage

- 5.46 A Flood Risk Assessment and Surface Water Drainage Strategy has been prepared to support this planning application. This confirms that all areas of the site proposed for built development lie within Flood Zone 1 and that there is no known history of flooding from fluvial or tidal sources.
- 5.47 With regards to surface water, the proposal is to incorporate a Sustainable Urban Drainage System (SuDS) solution that uses attenuation for the surface water that falls on the site, together with permeable surfaces for the car parking. The drainage strategy includes the following measures:
- The roof areas to be suitably drained with sufficient opportunity for infiltration to the ground, where possible, to the proposed underground crate
 - Permeable surfaces throughout the development, including pavements and car parking areas
 - A restricted water discharge point to the existing drainage ditch to the south of the site, which will be enhanced to ensure there is suitable overflow capacity from the site
 - A lowered kerb to the parking area to ensure that excess surface water is routed away from the building, and safely into the drainage ditch.
- 5.48 The application is supported by a Flood Risk Assessment and Drainage Strategy. This has been updated to take account of the proposed part basement level. It concludes that A foul water drainage strategy has been presented that passes foul flows of up to 3.1l/s to a 300mm diameter Southern Water foul sewer eastwards adjacent to the site boundary in Yapton Road and that the proposed FRA demonstrates that the proposed development will not increase the flood risk elsewhere in accordance with current policy and guidance.

Sustainability and Energy Efficiency

- 5.49 The applicant is committed to promoting sustainable developments and in accordance with the objectives of Policy ECC SP2 the proposed buildings have been designed to meet best practice sustainability criteria, including the production of 10% of energy requirements from low carbon sources. Further details are to be covered by means of planning condition.

Ecology

- 5.50 A Preliminary Ecological Assessment and accompanying bat surveys have been prepared to support the planning application.
- 5.51 No evidence of roosting bats was recorded at any of the buildings or at the tree during surveys. The site is not considered critical for populations of any species of fauna or flora of nature conservation importance.
- 5.52 Further enhancement measures are proposed to increase the site's biodiversity value in accordance with Local Plan Policy ENV DM5.

Land Quality

- 5.53 A Preliminary Land Quality Assessment and a Site Investigation Report have been prepared to support this planning application. These conclude that the site is capable of accommodating the proposed use, subject to a remediation strategy that is to be submitted to the Council prior to the commencement of construction.

Archaeology

- 5.54 The scheme is not considered to adversely impact upon any heritage or archaeological assets within the vicinity of the site.

Other material considerations

- 5.55 There would be substantial benefits associated with the proposal. These are summarised in the following paragraphs and are, we respectfully suggest, compelling material planning considerations in support of approving this application.

The identified need for older people's accommodation in Arun District

- 5.56 The Council's analysis forecasts that the population of Arun residents over the age of 75 will increase by 66% by 2031 with a resultant need for a further 2,250 units of specialist housing required.

- 5.57 The need for accommodation for older people in Arun was reinforced in a recent appeal decision relating to a proposed dementia care home (appeal reference APP/C3810/W/19/3227374 at APP/12). In that case, the Inspector concluded that:

'there is a pressing need for dementia care...across the authority as a whole. I attach substantial weight to this factor, in light of government guidance with post-dates adoption of the ALP [Arun Local Plan];

and

'the lack of sufficient site allocations for care homes casts considerable doubt over the ability of the Council to meet the needs of dementia sufferers, both now and into the future. The ALP does not embody the proactive approach being advocated in national guidance, particularly having regard to the significant identified unmet need in Arun for specialist housing'.

- 5.58 It is clear that there is a pressing need for accommodation for older people in Arun generally and that need will increase and become increasingly urgent over time if suitable accommodation is not provided. The proposal would make a meaningful contribution towards meeting this need with a high quality proposal that would provide an excellent standard of accommodation in a sustainable location.

Housing Supply Benefits

- 5.59 The most recent version of the NPPG (June 2019) acknowledges that '...plan-making authorities will need to count housing provided for older people against their housing requirement'. The proposal will therefore deliver up to 66 new units to the local housing stock (minus the loss of the existing dwelling on the site). This level of provision is in excess of that which might be delivered through the extant planning consent.
- 5.60 This housing contribution is highly significant in the context of the Council's Five-Year Housing Supply position. The relevant chapter from the latest Authority Monitoring Report shows that the Council is currently falling below its 5-year housing supply target, with a current supply of 3.7 years. The proposal will therefore support housing numbers at a time that the Council does not have a five-year housing supply and on a site that has good connectivity to services and sustainable transport.

- 5.61 A further benefit of the care home proposal is that it has the potential to free up other sectors of the housing market by releasing much-needed family housing accommodation. Residents moving into care homes often 'downsize' from larger dwellings and the proposal therefore delivers a knock-on benefit across the whole housing chain. This in turn will help to reduce pressure on other sites in the area.

Employment Benefits

- 5.62 The proposal has the potential to generate significant employment opportunities, including jobs for local people. It is anticipated that the care home will create jobs for approximately 50 to 55 staff (full-time equivalent) and between 60 and 70 jobs overall (including both part-time and full-time positions). The applicant expects that the majority of staff would be recruited from within the local area.
- 5.63 In addition, the new facilities will create knock-on employment opportunities, for example, during construction and through associated facilities and services to support the on-going care home operation.

Contributing to a Balanced and Sustainable Community

- 5.64 Aside from addressing local community needs through the provision of specialist on-site care, the applicant and their operating partners are committed to integrating their schemes into existing local communities. For example, the community rooms within the new care home (including café area, hairdressers and activity rooms) would be available for use by the local public and local community groups by prior arrangement, thereby complementing wider community objectives for the local area.
- 5.65 An additional social benefit is that the proposal can help to minimize the costs to health and social services. Residents will primarily be drawn from the local area and the large majority will already be Arun and West Sussex residents. In providing specialist and dedicated in-house care and support, the new care home can reduce the need for residents (who might have previously lived alone) to call on local healthcare services. The applicant intends to liaise closely with the local GP practices once the operator has been confirmed.
- 5.66 In summary, it is our view that the benefits outlined above attract substantial weight and accord fully with the economic, social and environmental strands to sustainable development as outlined in the

NPPF. Moreover, the proposal will fully complement the proposed mix of uses within the local area allowing for housing choice and facilitating community interaction. The land is suitable, available and achievable, thereby allowing these benefits to be provided in the short term.

The 'fall-back position' and consistency in decision making

- 5.67 As has been described elsewhere in this Statement, there is an extant planning permission for the erection of 13 dwellings at the site. That permission has been lawfully implemented.
- 5.68 Importantly that proposal is also for an 'L' shaped form of development of a comparable scale and layout to the current proposal. Consent has already been granted for a development at the site that would have a very similar relationship with the character and appearance of the wider area as the proposal.
- 5.69 This application is supported by a comprehensive Landscape and Visual Appraisal prepared by SLR. They have forensically considered the landscape and visual effects of the proposal when considered against the baseline of the consented and implemented scheme for completeness.
- 5.70 On 'density' (which has been measured considering built form and hardstanding), the Appraisal demonstrates that the proposal is only 6.8% higher than the 'fall-back' scheme. It is, in fact, 6.3% lower than the density of existing residential of Silver Birch Drive
- 5.71 The Appraisal concludes that the potential visual effects of the proposal would be localised and moderate/minor on only the closet residents and this would reduce to minor effects in the long-term.

6.0 Conclusions

- 6.1 This application has been submitted to seek to overcome the concerns raised by the Local Planning Authority relating to a refused scheme for a similar development in February 2020.
- 6.2 The Council refused planning permission because it considered the scale and density of that development to cause harm to the character and appearance of the area.
- 6.3 The scheme has been revised so that it is substantially lower. There would be no accommodation at second floor level. This reduction has been achieved through internal rationalisation and the provision of a part basement level.
- 6.4 The second reason for refusal was a concern relating to the long-term health of two protected Ash trees near to the entrance of the site. This concern is not supported by the arboricultural statement submitted with this application, which demonstrates that the trees would not be harmed by the development.
- 6.5 Since the last application was submitted, an extant permission for 13 dwellings at the site has been implemented. That scheme had the same access and the same relationship with the trees as the current proposals.
- 6.6 All other aspects of the proposals remain the same as with the previous scheme. The Local Planning Authority found all other aspects of the proposals to be acceptable.
- 6.7 In light of the revisions that have been made to the scheme, we would respectfully request that planning permission is granted.

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