



PLANNING POLICY STATEMENT

**Land West of Yapton Road (former Poultry Farm)
Middleton on Sea
PO22 6DY**

Planning Application on Behalf of Frontier Estates

September 2019

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Our Ref: 18051

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1. Introduction

- 1.1 This Planning Policy Statement is submitted on behalf of Frontier Estates in respect of proposals for the development of land west of Yapton Road, Middleton-on-Sea to demolish the existing structures and 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. The new care home will be registered with the Care Quality Commission (CQC) and will 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.

Background to the Proposal

- 1.2 By means of background, Frontier Estates have completed more than 150 development projects across all sectors of the market since 1996. They are one of the leading national developers in the care home sector and work closely with major operators to meet their operational requirements and the aspirations of future residents. They have worked with all the major operators in the market including, but not limited to, Barchester, Care UK, Anchor, Hallmark and Sanctuary.
- 1.3 The land at Yapton Road has been identified to address a pressing local need for care home accommodation and the characteristics of the site lend themselves favourably to the proposed use. Importantly, the principle of development on the site has already been established through an extant consent for 13 dwellings (see further details in section 2 of this Statement).

Community and Stakeholder Consultation

- 1.4 As summarized in the Statement of Community Involvement accompanying this submission, Frontier have engaged positively with the local authority and local communities prior to the submission of this application. This has included formal pre-application discussions with the local planning authority and a public exhibition attended by residents, the Parish Council and local Council Members. The layout and design of the proposed development has evolved to reflect advice received throughout this process.

Scope of Supporting Information

- 1.5 In accordance with the Council's list of local validation requirements, and following the Council's pre-application advice, the application is accompanied by the following drawings and supporting documents:

Drawings submitted for Formal Determination

Drawing 1904/PA/001	Site Location Plan
Drawing 1904/PA/002	Site Plan as Existing
Drawing 1904/PA/005	Proposed Site Layout Plan
Drawing 1904/PA/006	Proposed Site Block Plan (showing ground floor

	arrangement)
Drawing 1904/PA/010	Proposed Ground Floor Plan
Drawing 1904/PA/011	Proposed First Floor Plan
Drawing 1904/PA/012	Proposed Second Floor Plan
Drawing 1904/PA/013	Proposed Roof Plan
Drawing 1904/PA/020	Proposed Elevations Sheet 1
Drawing 1904/PA/021	Proposed Elevations Sheet 2
Drawing 1904/PA/022	Proposed Site Sections Sheet 1
Drawing 1904/PA/023	Proposed Site Sections Sheet 2
Drawing PO2	Landscape General Arrangement Plan
Drawing TR04	Proposed Access Arrangement
Drawing SWDS 01	Proposed Drainage Arrangement

Drawings Submitted for Information Purposes Only

Drawing 1904/PA/003	Site Plan (Footprint Comparison)
Drawing 1904/PA/024	Site Survey
Computer Generated Image	

Supporting Information

Planning Policy Statement
Statement of Community Involvement
Design and Access Statement
Care Needs Assessment
Flood Risk Assessment and Drainage Strategy
Ecological Impact Assessment
Biodiversity Checklist
Preliminary Land Quality Risk Assessment
Site Investigation
Transport Statement
Draft Travel Plan
Construction Traffic Management Plan (Outline)

- 1.6 The purpose of this planning statement is to appraise the scheme within the context of the allocations that apply to the site and the planning policies set out in the NPPF and the Development Plan.
- 1.7 The Statement is set out as follows:
- Section 2 describes the site and surroundings
 - Section 3 summarises the national and local plan policies relevant to the proposal
 - Section 4 outlines the nature of the proposed use
 - Section 5 assesses the scheme in respect of land use, design, residential amenity, highways and environmental matters
 - Section 6 draws together the conclusions of the report

2 Site and Surroundings

Site Context

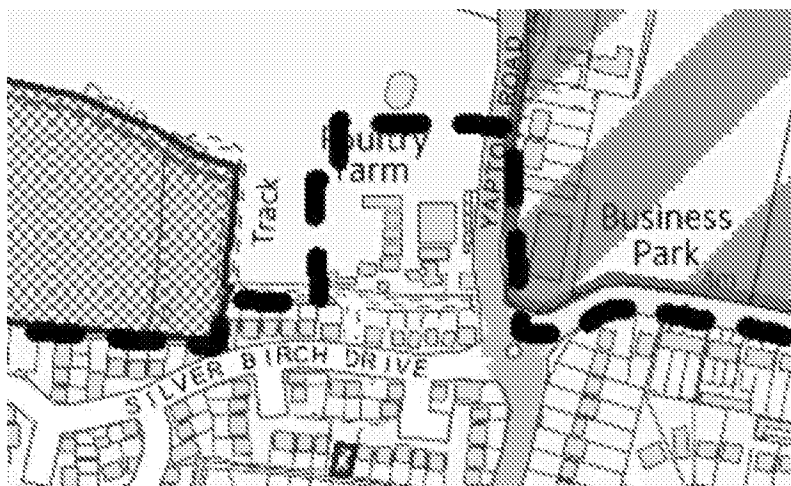
- 2.1 The subject site is 0.62 hectares in size and is positioned to the west of Yapton Road and immediately north of Silver Birch Drive.
- 2.2 The land was formerly used as a poultry farm and contains a two storey dwelling in the south-eastern corner of the site and various single storey outbuildings. The site was vacated in 2005 and has since fallen into disrepair. The vegetation is overgrown and we understand that the site attracts anti-social behavior. 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 1,130 sqm.
- 2.3 The site is predominantly flat and benefits from a potential vehicular access via an existing road spur off Silver Birch Drive to the south.
- 2.4 There are a number of mature trees adjacent to the eastern and southern boundaries and a handful of smaller trees within the site itself. Three of these trees are covered by a Tree Preservation Order.
- 2.5 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 an existing watercourse.
- 2.6 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.

Accessibility

- 2.7 The site occupies a sustainable position, 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. Bus stops are located approximately 400 metres to the north and south.

Site Allocations

- 2.8 Until the adoption of the new Local Plan the site had fallen within the open countryside. However, within the new Plan, the majority of the site is included within the defined Built-Up Area.
- 2.9 The land to the east of the site forms part of an identified 'Gap Between Settlements' while the land to the west comprises existing open space. These designations are shown on the extract from the Local Plan Proposals Map over page:



(Extract from Local Plan Policy Map 3)

- 2.10 The site falls within Flood Zone 1 (lowest risk of flooding).
- 2.11 There are no heritage constraints relating to the site itself.
- 2.12 The site is covered by a Tree Preservation Order which affects three trees adjacent to the access from Silver Birch Drive.
- 2.13 As noted above, public footpaths and byways lie adjacent to the southern and eastern boundaries.

Planning History

- 2.14 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).
- 2.15 The approved 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 (thereby allowing for the retention of the protected trees). A new vehicular access was to be formed from the existing road spur off Silver Birch Drive to the south.
- 2.16 Whilst not implemented, this permission remains extant until February 2020.

3 Planning Policy

National Planning Policy Framework

- 3.1 The NPPF (June 2019) sets out the Government's planning policies for England and how these should be applied.
- 3.2 Paragraph 10 of the NPPF 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.
- 3.3 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'*[our highlighting].
- 3.4 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."*
- 3.5 With regards to highways, Paragraph 108 states that in assessing specific applications for development, it should be ensured that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users; and
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to

an acceptable degree.

- 3.6 Paragraph 111 requires that all development that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 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.
- 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 planmaking 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 (paragraph 001).
- 3.11 It is acknowledged 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*", although for residential institutions calculations might be based on the average number of adults living in a household (Paragraph 016).
- 3.14 In respect of affordable housing, the PPG acknowledges the need for a 'proportionate' assessment of viability in respect of older persons housing schemes and suggests that plans should set out different policy requirements for different types of development (paragraph 015).

Local Planning Policy

- 3.15 Section 38 (6) of the Planning & Compulsory Purchase Act 2004 requires that, when making a determination under the Planning Acts, that determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Local Development Plan against which the proposals for the subject site are to be considered comprises the Arun District Local Plan (2011-2031) as adopted in July 2018.
- 3.16 The list of relevant Local Plan policies has been agreed with the Council as part of pre-application discussions and comprises the following:
- | | |
|---------|---|
| 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 |

- 3.17 An assessment of the proposed development against these policies is provided in section 5 of this Statement.

3.18 There is no Neighbourhood Plan for the area.

3.19 Relevant supplementary planning guidance includes the following:

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

4 Development Proposal

- 4.1 Frontier Estates propose to redevelop the site to provide a new 66-bedroom care home (Use Class C2). The proposed site boundaries and site area are consistent with that of the extant housing scheme referred to above.
- 4.2 The new care home will be registered with the Care Quality Commission (CQC) and will 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 will 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 will be approximately 85 to 90 years. Residents will move into the care home 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 will be 15 – 18 months and the average length of stay for residents in residential care will be approximately 2 years.
- 4.3 The scheme has been drawn up to meet the specifications and requirements of a leading, national care home operator and will be an exemplar in terms of the standard of facilities and the provision of support and care. The care home will exceed the space standards set by the CQC and will incorporate the following facilities and features:
- All bedrooms to 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 are to 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
 - Car and cycle parking as well as dedicated spaces for deliveries and ambulance
- 4.4 The design of the new care home building draws upon many of the principles established in determining the earlier residential proposal in terms of access, layout, scale and massing. A key aspect of this is to position the built form parallel to the north and east sides of the site, to respect the approved building lines and to retain the existing protected trees. The L-shaped plan of the proposed care home achieves this in allowing for a central courtyard and landscaped space to provide a sense of arrival and to accommodate parking and garden uses. The existing and proposed landscaping will be subject to an on-going programme of management and maintenance.
- 4.5 Development along both boundaries is restricted to two storeys in height together with the use of a pitched roof. Although the opportunity is taken to incorporate additional accommodation within the roof space in the northern part of the development, this element of the building will continue

to read as a traditional two storeys. The articulation of the elevations, together with the treatment of the roof form and the use of a varied palette of high-quality materials, allows for the building to read as a series of distinct elements, thereby breaking up the overall mass.

- 4.6 Access into the site will be from Silver Birch Drive, utilizing the existing cul-de-sac between nos. 12 and 14 Silver Birch Drive. This access drive will lead to two car parking areas (beyond the retained trees) providing space for 29 vehicles. The access and arboricultural arrangements respond closely to those of the approved scheme.

Pre-Application Discussions

- 4.8 Frontier has engaged in pre-application discussions with the local planning authority and other stakeholders in respect of its proposals. A pre-application submission was submitted to the Council on 20 February 2019 in response to which the local planning authority issued a written response on 18 April 2019 and subsequent follow up advice on 13 May 2019. The Council's pre-application response offered support for the principle of the proposed care home use, but raised concerns with the 3 storey northern element of the scheme as originally submitted. By contrast, the two storey southern projection facing Yapton Road was considered acceptable. Officers stated that this southern elevation contained a clearly defined and varied distinction in roof height, thereby creating a perception of a linked, rather than continuous built form. Frontier have subsequently amended the scheme design to ensure that both the northern and southern projections are restricted to two storeys in height and so that both elevations offer the same variety in roof height and elevational treatment.
- 4.9 Frontier also held a public consultation on 22 August 2019 at which the amended scheme design was presented to local residents and stakeholders. The wider consultation process, including the engagement with local communities, is documented in the accompanying Statement of Community Involvement.
- 4.10 Following the consultations, several design revisions have been made to the scheme. These changes are set out below.
- (i) Amending building heights and the elevational treatment to provide a fully two-storey building and introducing a more varied and broken-up roof profile to both elevations.
 - (ii) Increasing the level of car parking provision from 26 to 29 spaces.
 - (iii) Reconfiguring the internal arrangement of the accommodation in the southern part of the building to ensure that the communal spaces overlook the landscaped courtyard rather than the car parking area.
 - (iv) Increasing the distance between the northern elevation and the site boundary (to achieve a minimum distance of 10 metres).
 - (v) Preparing a detailed arboricultural proposal to address any immediate tree works and to facilitate the long-term retention and management of the trees on the site.
 - (vi) Preparing a site-specific surface water drainage strategy.
 - (vii) Ensuring that the car parking area allows for the provision of electric charging points.

5. Planning Considerations

5.0.1 This section of the Statement assesses the proposal in light of the relevant Development Plan policies and having regard to the wider strands to sustainable development set out in the NPPF. The key planning considerations, as identified in pre-application discussions with the Local Planning Authority and considered in further detail within this Chapter, comprise the following:

1. The principle of the proposed care home use
2. The impact on the visual character of the area (including the impact on existing trees and sustainability)
3. The impact on the amenity of neighbouring properties
4. The impact on highways
5. The impact on the environment – with particular reference to drainage, ecology and trees

1. The Principle of the Proposed Care Home Use

5.1.1 The principle of development on the subject 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.

5.1.2 Having regard to the proposed care home use, we consider that this will address a wide range of local community needs and will fully accord with the three strands of sustainable development set out in the NPPF and Policy SD SP1 of the Local Plan – economic, social and environmental. These public benefits are summarized below.

Meeting a Local Need for High-Quality Care Accommodation

5.1.3 The proposal will deliver high-quality specialist accommodation for older people. The new care home will be future proofed to meet best practice standards for care accommodation, will result in a long-term enhancement to the provision of care within the local area and will offer housing choice. In the case of the subject site, the land is in a sustainable location for a care home use, the proposal will complement the mix of uses in the area (both existing and proposed) and there is no existing concentration of provision within the locality, thereby ensuring that the scheme will support the creation of a mixed, inclusive and sustainable community.

5.1.4 At a national level, the population aged 85 and over is projected to double from 1.7 million in 2018 to 3.4 million in 2030. To 2038, the 65-69 age group is projected to grow by 15%, the 70-74 age group 44%, the 75- 79% age group by 63%, the 85-89 age group by 89%, the 90-94 age group by 162% and the 95- 99 age group by 216%. In reflecting this demographic crisis, the NPPF requires local authorities to reflect the housing needs of older people in planning policies which includes the provision of care home accommodation. The most recent revisions to PPG are more explicit in stating that *"the need to provide housing and housing choice for older*

people is critical as people are living longer lives and the proportion of older people in the population is increasing."

- 5.1.5 At a County level, the West Sussex Joint Strategic Needs Assessment (JSNA) (2015) refers to a 16% increase in the population of the 85+ age group over the next 5 years. It is further stated that *"Longer term planning needs to build in higher increases in the 85+ age group; with an acceleration from 2019 onwards."* Current projections estimate an 18% increase between 2019 and 2024, and a 20% increase between 2024 and 2029. It is this sector of the population that the proposed care home would cater for. In addition, the JSNA estimates that there are currently 13,500 people over 65 living within dementia in West Sussex and that this is likely to rise to 20,300 people within 15 years.
- 5.1.6 Arun District Council's Strategic Housing Market Assessment (2012) indicates that the care home population will increase by *"around 1,470 persons between 2012 and 2030"*, but that this need is not being met within site allocations (paragraph 6.3 refers). Moreover, despite acknowledged need for C2 development, the Local Plan makes no C2 allocations within the vicinity of the subject site.
- 5.1.7 In substantiating the SHMA position, Frontier's own assessment of demand and supply points to an existing and future shortage of the kind of provision required by local residents. This assessment considers the level of demand for market standard bed spaces within the local catchment area for the site (which is considered at both a 1 mile and a 3-mile travel distance). When accounting for all existing provision (nearly all of which is within older-stock), the current shortfall within a 1 mile radius of the site is 110 bedspaces, indicating that at least 2 care homes of the scale proposed on the subject site would be needed to keep pace with current demand (and not accounting for any future uplift in demand to reflect the ageing population referred to within the JSNA). This level of need is also reflected within the wider 3-mile target area within which the majority of prospective residents are likely to live to present. Moreover, the limited care home supply that is available within the 1-mile and 3-mile catchments includes a prevalence of smaller converted homes and an absence of modern, purpose-built care facilities.
- 5.1.8 The proposed care home use is also consistent with the Council's policy objectives. Policy HDM2 of the new 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*

5.1.9 We respond to these criteria below:

- (a) As noted above, the new care home falls within the Built-Up Area.
- (b) The location of the site is highly suitable for the proposed care home use. The site is physically and visually connected to the existing built up area to the south, it is within walking distance of the shops at Middleton and there are good bus and cycle links to surrounding areas. In determining the earlier planning application, and as part of the pre-application process relating to this submission, it was agreed that the location of the site within the Built-Up Area means that it is in a sustainable location. Officers have confirmed that the site is well placed to serve new development and is reasonably accessible to both existing and planned communities in and around Middleton and Felpham. In determining the earlier residential scheme, the highways authority also noted that the site connects into local facilities for pedestrians by way of the existing footpath network accessed from Silver Birch Drive, where access to a range of facilities and services is available including the no. 600 bus service and National Cycle Route 2. It was further noted that the surrounding highways conditions do not pose a barrier to cycling and that the site's location would offer future residents a realistic alternative to the use of the private car. Whilst each of the factors listed above are of limited relevance to prospective care home residents (given their high levels of dependency), they are important in promoting the sustainability of the site for access by staff and visitors.
- (c) The scheme has been designed to be flexible to the changing care needs of prospective residents and will be an exemplar in terms of the standard of facilities and the provision of support and care. Through the detailed design of the accommodation and the provision of care and support, the proposal will allow frail elderly residents, often with dementia, to remain as independent and active as possible and to interact with others. Further details are provided in the accompanying Design and Access Statement.
- (d) Please refer to section 5 (2) below
- (e) Please refer to section 5 (2) below
- (f) As noted in (c) above, the level of care and support offered within the new home will encourage the continuation of a healthy, active lifestyle for prospective residents.

Housing Supply Benefits

5.1.10 The most recent version of the NPPG (June 2019) clearly 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.

- 5.1.11 This housing contribution is highly significant in the context of the Council's latest Five-Year Housing Supply Report (dated February 2019) which shows that the Council is currently falling below its 5-year housing supply target, with a current supply of 4.7 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.
- 5.1.12 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

- 5.1.13 The proposed care home 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). Frontier expect that the majority of staff would be recruited from within the local area and positive steps will be taken to encourage this.
- 5.1.14 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

- 5.1.15 Aside from addressing local community needs through the provision of specialist on-site care, Frontier 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) will be available for use by the local public and local community groups by prior arrangement, thereby complementing wider community objectives for the local area.
- 5.1.16 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. Frontier intends to liaise closely with the local GP practices once the operator has been confirmed.
- 5.1.17 In summary, it is our view that the benefits outlined above attract significant 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.

2. Design and Landscape Considerations

- 5.2.1 The design of the scheme seeks to respect the site context, the parameters established through the extant planning consent and the Council's design policies (in particular, Local Plan policies D SP1 and D DM1) which relate to building form and character. These policies seek to ensure that the height and massing of new development does not interrupt or debase the rhythm of an existing building/roof line and overall streetscape, or detract from the local and wider area's character, including residential amenity. The site's visual character is in this case informed largely by the two storey residential area to the south, from which the access is taken, although it is acknowledged that the land also forms a transition to the open countryside beyond.
- 5.2.2 It is our view that the current proposal provides an opportunity to deliver a high-quality development that responds to the character of the area whilst delivering the public benefits outlined above. The overall design objectives are to achieve the successful integration of the buildings into their semi-urban surroundings, to create attractive buildings that respect amenity interests, to provide amenity spaces that are usable, safe and enjoyable and to ensure that proposals meet the principles of inclusive design. Within this context, the detailed design approach is outlined below:

Layout

- 5.2.3 The scheme seeks to achieve a balance between operational requirements, built form, amenity space and car parking provision, whilst at the same time ensuring that the new buildings can be set within a high-quality landscape setting. The following objectives of the design approach are noted:
- To respond positively to the policy context and to reflect the parameters of the approved scheme in terms of the means of access, the creation of a central landscaped space, positioning built form adjacent to the northern and eastern boundaries (with appropriate set-backs) and retaining existing landscaping.
 - To avoid development in the western part of the site and to utilise this space only for car parking provision (noting that, by contrast, the extant scheme introduced an element of built form in this location).
 - To make the central space a key focal point that creates a spacious and landscaped setting for the new home and which allows for the long-term protection of the existing trees. This space is screened from road noise by the proposed eastern elevation of the building.
 - To respect the approved building lines adjacent to each of the northern and eastern boundaries, thereby providing a sense of space around the new building.
 - To orientate the buildings in a way that maximizes the outlook from communal rooms, bedrooms and garden areas towards the new landscape spaces within the site.
 - To create a clear and legible means of access to the new care home and for the entrance to provide a clear sense of arrival and to promote surveillance.

- To provide car parking in a convenient location outside of the entrance to the home and where it can be set within new landscaping and behind the frontage trees.
- To achieve an appropriate visual relationship between the care home and the backs of the new houses including the retention of existing boundary planting which provides a suitable buffer to these properties. As set out below, the distances to the site boundaries and the proposed orientation of the accommodation (in which the flank elevations of the care home projections contain no windows to habitable rooms) ensures the protection of residential amenity.
- To retain the boundary planting and screening to the south and east and to reinforce this where necessary as well as putting in place a long-term management and maintenance regime.
- To introduce new landscaping and good-sized and useable amenity spaces for prospective residents.

Scale and Mass

5.2.4 The submitted scheme design, as revised through the pre-application process, is not considered to materially increase the prominence of built form when compared with the extant residential proposal. The following design principles are noted:

- 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.
- Whilst accommodating the care home within a single building (as is necessary for operational reasons) the proposal seeks to create 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. This approach is considered to be particularly important where views into the site are possible along Yapton Road. 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 reduce the scale of the care home.

5.2.5 Overall it is considered that views of the building will read as a series of stepped and varied elevations which are softened by boundary hedging and enhanced planting.

5.2.6 Importantly, the submitted scheme provides a common-design approach for both the northern and southern projections, with the northern element having been re-designed to respect the heights previously agreed and to reflect the principles for the southern element that were supported by officers at the pre-application stage.

Trees and Landscaping

- 5.2.7 There are a number of trees within the site and adjacent to its boundaries that contribute to local character, including three protected trees. Although the care home does not fall within the root protection area of the protected trees, the site access will incur into them. The arboricultural approach and the proposed access alignment responds to that agreed in determining the extant housing scheme. It is proposed that the access road and footways in this location be constructed using a Cellweb tree root protection construction. Further details are provided in the accompanying tree survey and arboricultural protection plan and demonstrate that both the demolition and construction elements of the scheme will allow for the long-term retention of the protected trees and will ensure that they remain a prominent feature within the site.
- 5.2.8 Elsewhere within the site, the proposed development will be located outside the root protection areas of the retained trees and, subject to adherence to the measures set out in the accompanying arboricultural method statement and protection plan, these trees will not be adversely affected by the construction works. The scheme does propose four additional tree removals to the previously consented scheme. This comprises two Category U trees and two Category C trees, each of which is considered to be of low quality and limited amenity value. One tree previously proposed for removal can also now be retained.
- 5.2.9 At the same time, the scheme will incorporate generous landscaped amenity spaces within the site including opportunities for the planting of new trees, shrubs and flowers. Frontier also propose to implement a management and maintenance strategy to secure the long-term health of the existing trees and to avoid the boundary vegetation encroaching onto the adjoining footpaths and right of way.
- 5.2.10 Whilst it is anticipated that the final information will be provided by means of condition, the landscaping plan accompanying this application shows the range and quality of the spaces to be provided. The landscaping will soften the overall impact of the development and offer a visual and amenity for prospective residents, with the orientation of the buildings maximising views from the new dwellings and from the communal rooms and bedrooms within the care home towards the new landscape spaces.
- 5.2.11 The main amenity space comprises a generous courtyard position centrally between the two main wings of the building which will provide a soft green entrance into the site. Further, good-sized secure gardens are to be provided to the north and east of the proposed building. There is space in the garden areas for sensory planting, raised beds, activity places, bench seating and socialising. In addition, most of the ground floor bedrooms will be provided within their own private patio areas and the main communal areas will extend onto outside terraces. At first floor level, an external terrace is provided from the main communal area giving access to an outdoor space for residents with limited mobility. Taken together, the external amenity space provision is equivalent to 30 sqm of useable space per resident.
- 5.2.12 Throughout the scheme boundary treatments will be sensitive to the context and will comprise a mix of metal railings, hedgerows and timber fencing. The scheme also includes the retention of

the drainage ditch along the boundary with the public footpath and its enhancement with additional planting.

3. The Impact on Residential Amenity

- 5.3.1 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.
- 5.3.2 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.
- 5.3.3 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.

4. The Impact on Highways

Access

- 5.4.1 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

- 5.4.2 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

- 5.4.3 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.
- 5.4.4 The level of provision is considered to be entirely 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.
- 5.4.5 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.
- 5.4.6 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.
- 5.4.7 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.
- 5.4.8 Frontier have also prepare 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

5.4.9 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.

5.5 The Impact on the Environment

Flood Risk and Drainage

5.5.1 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.

5.5.2 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.

Sustainability and Energy Efficiency

5.5.3 Frontier 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

5.5.4 A Preliminary Ecological Assessment and accompanying bat surveys have been prepared to support the planning application.

- 5.5.5 No evidence of roosting bats was recorded at any of the buildings or at the tree during surveys.
- 5.5.6 A small population of common lizard and slow worm was found to be present on site, however, no evidence of other protected or notable species has been recorded and the potential presence of significant populations of any such species is considered to be very low. As such it is concluded that the site is not considered critical for populations of any species of fauna or flora of nature conservation importance.
- 5.5.7 Notwithstanding this, it is recommended that enhancement measures are proposed as part of the scheme to minimise the risk to individual populations and to ensure that wildlife legislation is adhered to. Further enhancement measures are proposed to increase the site's biodiversity value in accordance with Local Plan Policy ENV DM5. This includes the use of reptile refugia, the provision of bird and bat boxes and additional hedgerow planting.

Land Quality

- 5.5.8 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

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

5.6 Planning Obligations

- 5.6.1 The extant housing scheme was the subject of a section 106 agreement which included provisions in respect affordable housing, education, libraries and fire and rescue. By contrast, taking into account the range of on-site communal facilities and the limited mobility of prospective residents, the applicant does not consider that the proposed care home development would result in a comparable level of pressure on local services. No education contributions are therefore proposed. In respect of library, healthcare and fire and rescue services, it is accepted that other recent care home schemes have included an appropriate contribution subject to viability and Frontier await the response of the County Council on these matters.
- 5.6.2 With regards to affordable housing, policy AH SP2 of the Local Plan requires a 30% provision from all developments of 11 residential units. The policy is silent on its applicability to care home developments, but paragraph 12.3.7 of the supporting text refers to an expectation that the policy applies to schemes of 11 'dwellings' or more. The current proposal is not for dwelling houses, which fall within Use Class C3, but for a care home falling within Use Class C2.
- 5.6.3 Frontier are aware that in determining another care home application for land at Brook Lane in Angmering in April 2018 (LPA Ref A/44/17/OUT) the Council's housing officers concluded

that where '*... a genuine care home that is proposed which lacks a degree of permanence for the individual then the affordable housing policy will not be applied.*' In respect of the proposals for the subject site, on-going pre-application discussions have confirmed that C2 care homes will not be expected to make affordable housing contributions.

5.6.4 In this case, the proposed care home will be registered with the Care Quality Commission (CQC) and will provide 24-hour support and care, meeting residential, nursing and dementia care needs, including end of life and palliative services. As outlined in paragraph 4.2 above, the average age of residents will be approximately 85 to 90 years, residents will move into the care home only when their needs cannot be met in their own homes and the average length of stay of residents is 15 months to 2 years. The proposed use would clearly fall within use class C2 (residential institutions) for the following reasons:

- The level of care significantly exceeds that within a C3 use.
- Accommodation is not self-contained
- 24 Hour care from a qualified nurse is available
- Communal facilities include multiple activity spaces and resident's lounges to encourage socialising Meals and personal services are routinely provided to all residents
- Supervised facilities are be provided
- The care beds are leased on a weekly basis. There is no ownership option (either leasehold or freehold).

6. Conclusions

- 6.1 The proposed development of this sustainable site represents a carefully considered scheme that is in accordance with the NPPF policies on sustainable development. It comprises the development of a new care home on previously developed land within the Built-Up Area. The site is well served by local facilities and the proposal will fully complement the mix of uses in the existing settlement.
- 6.2 The proposal will deliver significant planning benefits including:
- Providing an exemplar in terms of standard of facilities and the provision of support and care. The care home will be registered with the Care Quality Commission, providing 24-hour support and care for the frail elderly and meeting a full range of residential, nursing and dementia care needs
 - Delivering care accommodation to meet a recognised and growing need in Arun, while increasing housing choice in the community
 - Providing jobs for local people, including both part-time and full-time positions
 - Creating savings to the taxpayer – having dedicated care reduces bed blocking and reliance on hospital services
 - Stimulating the local property market by releasing much-needed family homes when residents 'downsize', as well as smaller homes for first-time buyers further down the housing chain
 - Contributing to the Council's five-year housing land supply
 - Providing facilities for use by the local community, including a café and facilities/activity rooms bookings by local groups
- 6.3 The design, scale and layout of the proposed development seeks to respond positively to the site context and the extant planning permission. The buildings are to use good quality materials, the elevations are to be treated sensitively to break up the form of the development and building heights are restricted to two storeys. The existing vegetation on the site boundaries is to be retained, as are the three trees covered by a TPO, and the new buildings will be set within attractive new landscaping and open space provision. For these reasons we consider that the scheme will be a positive addition to the local area and will respect the character of the surrounding built form.
- 6.4 The positioning and orientation of the buildings respects the amenity of neighbouring properties as well as creating a high-quality living environment for prospective residents and occupiers.
- 6.5 The proposal delivers a safe and convenient means of access from Silver Birch Drive and the level of car parking is appropriate to the proposed use and in accordance with the Council's standards. Furthermore, the new care home will be the subject of a Travel Plan to encourage the use of more sustainable modes of transport.
- 6.6 All other environmental matters relating to drainage, trees, ecology and sustainability have been addressed in full within the technical documents accompanying this submission and respect the principles already agreed in determined the extant housing scheme.

- 6.7 The applicant has engaged in detailed pre-application discussions with the local planning authority, local stakeholders and the community and has sought to respond positively to the comments received.
- 6.8 In summary we believe that the proposal comprises sustainable development and accords with the policies set out in the Council's Local Plan. As such, we respectfully request that the Council approve the submitted application.