

PLANNING DESIGN & ACCESS STATEMENT

Freeman Close Eastergate Lane Walberton BN18 0AE

Change of use of and conversion of existing buildings and land to form 25 no. dwellings
(within existing footprints) with associated hard and soft landscaping, parking, car ports, play areas, and works.

May 2026





Smith Simmons & Partners

PLANNING DESIGN & ACCESS STATEMENT

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a full planning application seeking permission for the conversion of existing buildings (residential care village community) to provide 25 no. dwellings (Use Class C3), car ports, landscaping & parking. Together with associated works at Freeman Close, Eastergate Lane, Walberton.
- 1.2 The proposal relates to the reuse and adaptation of a previously purpose-built residential care village community originally permitted during the 1980s. The buildings are now vacant following the cessation of the former care use.
- 1.3 The current scheme evolves earlier pre-application proposals through modest refinement of unit numbers while retaining the fundamental principle of reusing the established built form rather than introducing substantial new development.
- 1.4 The purpose of this statement is to highlight the framework of the planning context of the site, assesses the proposal against national and local planning policy, and demonstrates that the development represents sustainable development for which planning permission should be granted. According to Environment Agency mapping the site is located with EA Flood Zone 1 and is at the lowest level of flood risk across the three categories.





2.0 THE SITE AND SURROUNDINGS

- 2.1 The application site comprises a group of single and two-storey buildings arranged around internal access roads and landscaped grounds forming a former residential care community. Associated parking areas, circulation space and soft landscaping are contained within the site boundary, which extends to approximately 1.85 hectares.
- 2.2 The building's lawful use is as a residential care facility (Use Class C2) and it is understood the care facility closed in August 2024. Constructed in the 1980s with modern red brick with a small amount of white render and tile hanging. The pitched roofs are red tiled, with the majority of properties featuring large bay windows in brown uPVC. Their scale, form and domestic architectural character reflect the historic residential function of the site. Vehicular access is taken from Eastergate Lane, with parking located primarily toward the southern portion of the site.
- 2.3 For planning policy purposes the land lies outside the defined Built-Up Area Boundary and is therefore located within the countryside. Notwithstanding this designation, the site adjoins existing residential development and forms part of a coherent cluster of built form along Eastergate Lane. The land is previously developed, having been continuously occupied by permanent buildings and associated infrastructure connected to residential care facility use.



Figure 1. Application site outlined in red

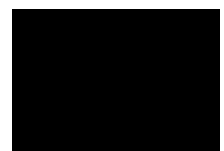


3.0 PLANNING HISTORY

- 3.1 The proposed development seeks planning permission for the conversion of the existing buildings to provide 25 no. self-contained residential dwellings within Use Class C3. The proposal is primarily a change of use and internal reconfiguration of the existing buildings, with only limited new built development associated with ancillary structures such as car ports, cycle storage and bin stores.
- 3.2 The scheme retains the established built form, scale and appearance of the former care village, with no substantial extensions or new residential buildings proposed. Access arrangements continue to utilise the existing access from Eastergate Lane, and parking provision is accommodated within the site. Private and communal amenity spaces are provided within the established site envelope.

Pre-Application Engagement & Consultation

- 3.3 Pre-application engagement was undertaken with the local planning authority to establish the acceptability of converting the vacant care facility to residential use. Officer feedback confirmed that no policy objection arises solely from the loss of the former care function and that the reuse of existing buildings represents a material planning consideration in favour of the scheme. Officers further acknowledged that while the site lies within the countryside, the authority's housing land supply position is below five years. Consequently, the presumption in favour of sustainable development is engaged and any identified policy tension must be weighed against the social, economic and environmental benefits associated with redevelopment of the vacant site. ADC confirmed that; This is accepted in this particular instance as the existing buildings are being retained and converted to Residential C3 Use with no increase in Gross Floor Area.... *On this basis of conversion of the existing buildings therefore, no Affordable Housing delivery would be sought either on or off-site or by way of a Commuted Sum in Lieu.*
- 3.4 Subsequent to the pre-app with ADC engagement has also taken place with Walberton and Barnham and Eastergate Parish Council. Dialogue focused on housing mix, parking provision, landscape protection, biodiversity considerations and the principle of reusing the redundant care facility. Both parishes voiced local need for smaller dwellings. The evolution of the proposal reflects careful consideration of these matters together with officer advice.





4.0 RELEVANT PLANNING POLICIES

National Planning Policy Framework

- 4.1 The National Planning Policy Framework (NPPF) was updated in December 2025. It replaces all previous Planning Policy Guidance Notes, Planning Policy Statements and various statements of policy in Letters to Chief Planning Officers. Paragraph 11 confirms that at the heart of the NPPF is a presumption in favour of sustainable development. For decision-taking this means:
- o approving development proposals that accord with an up-to-date development plan without delay; or
 - o where there are no relevant development plan policies, or the policies which are most important for determining the application area out-of-date, granting planning permission unless:
 - o the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed,
 - o or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 4.2 The NPPF states that the planning system should operate to encourage and not act as an impediment to sustainable growth and to boost significantly the supply of housing paragraph 69 requires planning authorities to identify a five-year supply of deliverable sites for housing.
- 4.3 The importance of maintaining a 5-year housing land supply is set out in section 5 of the NPPF. Paragraph 61 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Paragraph 68 requires planning authorities to identify a five-year supply of deliverable sites for housing.
- 4.4 The Council's most recent 5-year housing land calculation taken from the draft Annual Monitoring Statement dated November 2025 indicates that ADC's 5-year housing land supply has dropped from 4.17 to 3.41 years and in this respect the Local Plan is not up to date. The presumption in favour of sustainable development (the tilted balance) is therefore engaged for the proposal with regards to paragraph 11 (Part d) of the NPPF. Applications should only be refused where there are other policies protecting assets or areas of particular importance that provide a clear reason for refusing it or there are other adverse impacts that outweigh the benefits.
- 4.5 The Inspector, in recent appeal decision PINs Ref: APP/C3810/W/24/3349836 on Land East of Wandleys Lane, Fontwell, accepted the Council are only able to demonstrate a housing land supply of between 2.83 - 3.41 years. This is well below the five years required by the Framework and, even on the Council's figures, amounts to a significant shortfall of at least 2,822 homes. The situation has deteriorated from a year ago given the changes to the Framework and the subsequent increase in the housing requirement. In addition, the Council's Housing Delivery Test measure is 70%. This is a slight improvement on previous but is still below the threshold of 75%. As such, the delivery of housing has been substantially below the housing requirement for the last three years. In fact, delivery is even worse than this, as evidence provided by the Appellant for the appeal, which is not disputed by the Council, demonstrated that the Council has failed to deliver its housing requirement in every year between 2012 and 2024.

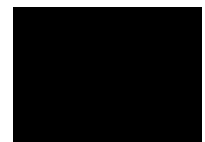




- 4.6 The 2025 NPPF states that the planning system should operate to encourage and not act as an impediment to sustainable growth and to boost significantly the supply of housing. Paragraph 72 requires planning authorities to identify a five-year supply of deliverable sites for housing. Paragraph 73 identifies that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly and are essential for small and medium enterprise housebuilders to deliver new homes.
- 4.7 The NPPF makes specific reference to previously developed land (PDL). The glossary defines previously developed land as land, which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
- 4.8 The application site has been in residential use and features existing C2 residential properties and associated garden land used in connection with Freeman Close. The whole site reads as residential. The proposal would represent the effective use of land by reusing buildings and associated land that has been previously developed, a Core Planning Principle of the NPPF. Residential curtilage outside a Settlement Boundary is considered to be “previously developed land”, *Dartford Borough Council v The Secretary of State for Communities and Local Government & Ors* [2017] EWCA Civ 141 (14 March 2017).

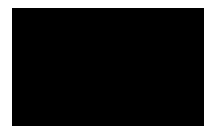
Arun Local Plan (ALP) 2011 - 2031

- 4.9 ALP was adopted in July 2018 after receipt of the Local Plan Examination Report which found the Plan (with modifications) to be ‘sound’. At Paragraph 89 the Inspector refers to the overall District housing requirement of 20,000 dwellings and the need for at least 1,250 of them to be provided on non-strategic sites. These requirements are now included in Policy HSP1 of Arun Local Plan.
- 4.10 The main relevant policies include SD SP1 Sustainable development, SD SP2 Built-up Area Boundary, C SP1 Countryside, DM1 Aspects of Form and Design Quality, D DM2 Internal Space Standards, H DM1 Housing Mix, H DM4 Conversion of rural buildings for residential use, AH SP2 Affordable Housing, D SP1 Design, ECC SP2 Energy and Climate Change Mitigation, ENV DM4 Protection of Trees, ENV DM5 Development and Biodiversity, QE SP1 Quality of the Environment, SD SP1 Sustainable Development, T SP1 Transport and Development, OSR DM 1 Open Space Sport and Recreation; W DM1 Water Supply and Quality and W DM3 Sustainable Urban Drainage Systems.
- 4.11 Policy CSP1 states that development in the countryside is inappropriate unless in accordance with other development plan policies. The most relevant policy is that relating to conversion of rural buildings H DM4 which allows for the conversion of existing rural buildings to other uses.
- 4.12 Policy H DM4 states proposals for the conversion of buildings for residential use outside the built-up area will not be permitted unless:
- a) Either, it has been demonstrated that reasonable attempts have been made to market and use the premises for business purposes or, residential conversion is a subordinate part of a scheme for business re-use;





- b) The building is structurally sound, of permanent construction, and capable of conversion without rebuilding or significant alteration or extension.
 - c) The resultant building and use will not have an adverse effect on the rural character of the area and is sympathetic to its setting in terms of form, bulk and visual design.
 - d) Particular regard will be given to the impact of any residential curtilage on the character of the countryside;
 - e) The traffic to be generated by the new use can be safely accommodated by the site access and the local road system.
- 4.13 The proposal accords with parts b, c and e and although it does not comply with part (a) the shortfall in Arun's housing land supply is a relevant consideration. This is less than 5 years, the Annual Monitoring Statement November 2025 indicates that ADC's 5-year housing land supply has dropped from 4.17 to 3.41 years which means the benefits of conversion, and the meaningful contribution of 25 no. additional residential units to the Council's identified housing shortfall, needs to be weighed against the harm in accordance with the NPPF 'tilted balance' at paragraph 11(d)(ii).
- 4.14 The pre-application response from the Council LA Ref: PAA/51/25 concluded that despite the conflicts with the development plan policies in terms of new dwellings in the countryside, officers did not consider that the harm associated with the location would be sufficient to outweigh the benefits. It was material that the site is existing, that very limited new built development is proposed, and that the existing use is a form of residential development.
- 4.15 Policy AH SP2 requires all developments of 11 no. residential units and over to provide a minimum of 30% of the total number of units to be provided as affordable housing. For developments of 11 no. units a balanced mix of market and affordable dwellings; including family sized accommodation; based on the most up-to-date SHMA recommendations are required. The Council accepted at pre-application stage that the requirements around policy AH SP2 in respect of affordable housing could be met in this particular instance as the existing buildings are being retained and converted to residential C3 use with no increase in gross floor area. On this basis it advised that no affordable housing delivery would be sought either on or off-site or by way of a commuted sum in lieu.
- 4.16 Policy D SP1 requires that all development proposals seek to make efficient use of land but reflect the characteristics of the site and local area in layout, landscaping, density, massing, character, materials, finish and architectural details.
- 4.17 Policy D DM1 considers Form and Design Quality stating that when considering any application for development the Council will have regard to the following aspects, character, appearance, impact, innovation, adaptability, crime prevention, trees and woodland, solar gain, public realm, layout, movement, legibility, density, public art and scale.
- 4.18 Policy QE SP1 Quality of the Environment states the Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the district.





- 4.19 Policy ENV DM5 Development and Biodiversity requires development schemes to seek to achieve a net gain in biodiversity and protect existing habitats on site. Section E.03 of the ADC Design SPD seeks to protect and enhance biodiversity in the development site and the wider area. Policy ENV DM4 seeks to ensure that development does not have a negative impact on existing trees.
- 4.20 Policy W DM1 Water Supply and Quality refers to Lidsey Wastewater Treatment Works Catchment Area. W DM3 Sustainable Urban Drainage Systems states ADC will encourage all development to identify opportunities to incorporate a range of sustainable urban drainage systems. These features include soakaways, permeable parking and driveways, and water storage.
- 4.21 Policy T SP1 of the ALP supports development which incorporates appropriate levels of parking in line with the West Sussex County Council guidance on parking provision. Arun has its own Parking Standards SPD (Jan 2020).
- 4.22 Policy ECC SP2 requires new residential and commercial development be energy efficient and incorporate decentralised, renewable and low carbon energy supply systems. ECC SP1 requires new development to be designed to adapt to impacts arising from climate change. The Policy states that where planning permission is required to retrofit energy efficiency measures into existing development, schemes will be permitted, subject to Design policies.
- 4.23 The policies in respect of care provision are not relevant as they relate to new and existing uses and not to retention and protection of the use.
- 4.24 Within the Arun Local Plan, strategic policy SD SP1 establishes the overarching requirement for sustainable development, while policy C SP1 defines the countryside and seeks to restrict inappropriate new built form in such locations. However, the Plan must be read as a whole, including policies that support the reuse of existing rural buildings, the delivery of housing, and high-quality design. In particular, policy H DM4 supports the residential conversion of rural buildings where their form, scale and setting are appropriate, and policies D SP1, D DM1 and D DM2 require development to achieve good design quality, protect amenity and provide suitable internal living standards. Environmental protection is secured through policies addressing biodiversity, trees, water management, flood risk and environmental quality, forming a comprehensive framework against which the proposal must be assessed.

Supplementary Planning Documents (SPDs)

- Arun District Design Guide Update (2024).
 - Arun Parking Standards (2020).
 - Accommodation for older people and people with disabilities (2019).
 - Arun Active Travel Study (2020).
- 4.25 This site is split between the Walberton and Barnham & Eastergate Parishes therefore policies of both the Walberton Neighbourhood Plan and Barnham and Eastergate Neighbourhood Plan are relevant.





Walberton Neighbourhood Plan

- 4.26 Neighbourhood Development Plans form part of the statutory Development Plan and provide locally specific policy direction. Walberton Neighbourhood Plan version 2 (WNP) 2019-2031 was made in July 2021. ALP Policy H DM4 allows for the conversion of existing rural buildings for other uses. There is a similar policy in the WNDP (VE9- Rural Buildings) although it only allows re-use for business, tourism, or recreation purposes. As per Section 38(5) of the Planning and Compulsory Purchase Act 2004, the WNDP policy would take precedence over the ALP due it being the newer document.
- 4.27 Paragraph 14 of the NPPF states that in situations where the presumption in favour of sustainable development applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement. In this case the Neighbourhood Plan is less than 5-years old, being 'Made' in July 2021 and the part of the proposed residential conversion within the Walberton district would generate conflict with the development plan as a whole.
- 4.28 WNP includes policies on housing that are broadly supportive of house building, even outside of the BUAB in some circumstances. Extracted below are the key aims of the NP in relation to housing:
1. to prioritise the use of brownfield sites excluding such land developed under a temporary or personal consent
 2. to avoid development on the large sites in the countryside around the Parish and in the gaps separating it from neighbouring parishes
 3. to disperse the new housing on several smaller sites and avoid urbanising the villages
 4. to provide a mix of new housing including smaller and sheltered units for those wishing to downsize and affordable starter homes giving priority to local residents or those with a local connection
 5. ensure that all new building is of a design compatible with adjoining properties and its setting
 6. construct houses to minimise the impact of climate change.
- 4.29 Additionally, policy HP1 2020 Built Up Area Boundary (BUAB) states that proposals for development outside of the built-up area boundary will be supported where they accord with countryside policies in the Arun Local Plan which refer to a specific use or type of development. The proposal specifically relates to conversion of existing rural buildings and as outlined above it would be subject to tilted balance considerations.
- 4.30 Other relevant policies are VE3 Protection of Trees and Hedgerows, VE8 'Unlit village' status, HP2 Windfall sites, HP6 Housing mix and construction and HP13 Design Guidance.
- 4.31 The Walberton Neighbourhood Development Plan establishes a vision shaped by community consultation and emphasises sustainable growth that respects rural character, protects landscape features, supports appropriate housing mix and density, and safeguards biodiversity, heritage and local distinctiveness. The Plan also confirms the importance of windfall development policies, built-up area boundaries, and design guidance aligned with the Arun Local Plan.





Barnham & Eastergate Neighbourhood Plan 2019 - 2031

- 4.32 Barnham and Eastergate Neighbourhood Development Plan (BENP), Post Examination Plan contains the following relevant policies ES1a Flooding, ES10 Trees and Hedgerows, ES12 Energy efficiency of existing development, ES15 Green Infrastructure and Ecosystem Service, ES17 Singleton and Cocking Tunnels SAC, GA4 Parking and new development, H2 Windfall sites, H5 Outdoor space and H8 Settlement boundary.
- 4.33 The part of the development within the Barnham & Eastergate Area, although located outside the built-up area boundary accords with the development plan as it is generally in accordance with the five criteria of ALP Policy H DM4.
- 4.34 The Barnham and Eastergate Neighbourhood Development Plan similarly reflect locally identified priorities, including the protection of settlement character, landscape setting, biodiversity assets, infrastructure capacity and community wellbeing. It recognises the scale of strategic housing growth already planned within the wider area and emphasises the need for development to integrate sensitively with its surroundings, provide appropriate open space and environmental mitigation, and demonstrate sustainable access to services and facilities.

West Sussex Joint Minerals Local Plan (MLP) July 2018

- 4.35 A review of the MLP indicates that the site is located within a Minerals Safeguarding Area for Sharp Sand & Gravel and therefore Policy M9 of the MLP is applicable to the site. Policy M9 (b) states that proposals for non-mineral development within the Minerals Safeguarded Areas will not be permitted unless: (i) Mineral sterilisation will not occur; or (ii) it is appropriate and practicable to extract the mineral prior to the development taking place, or (iii) the overriding need for the development outweighs the safeguarding of the mineral and it has been demonstrated that prior extraction is not practicable or environmentally feasible. However, given that the proposal relates to the change of use and conversion of the existing premises there will be no impact on mineral resources or their extraction which is already sterilised by the presence of the existing buildings on the site which are to be retained. Prior extraction is not practicable or feasible. Small-scale garage and bike stores are proposed to be constructed as part of the development, and these will not affect the mineral resources.





5.0 CONSIDERATION FOR THE DEVELOPMENT PROPOSAL

- 5.1 The proposal seeks the reuse and conversion of existing vacant buildings that were purpose-built for residential occupation as part of a former care village community. Rather than introducing substantial new built form into an undeveloped countryside location, the development proposes the continued use of an established complex of permanent buildings within a clearly defined and previously developed site. The proposal therefore represents the continuation of an existing pattern of development rather than encroachment into open countryside, allowing for policy compliance in this out of settlement location. The buildings are in sound structural condition, dating originally from the 1980s, and are suitable for conversion within the existing envelope alongside conversion and refurbishment works.
- 5.2 Pre-application advice from the local planning authority confirms that there are no development plan or national planning policy conflicts which would justify refusal on the basis of the loss of the former residential care use. The proposal aligns with the broader objective of securing viable long-term use for redundant buildings while bringing a vacant site back into use and mitigating deterioration and underutilisation of previously developed land. The Council's housing land supply position remains below five years, and the development would contribute in a meaningful way towards the delivery of housing for the district whilst utilising existing buildings. The proposal therefore does not result in the loss of a viable care facility. Rather, it provides an appropriate and sustainable alternative use for a vacant previously developed site, ensuring the retention and productive reuse of existing buildings whilst contributing towards identified housing needs within the district.
- 5.3 The site constitutes previously developed land, having been occupied by permanent residential buildings and associated infrastructure for an extended period. National planning policy places strong emphasis on the effective reuse of such land in order to reduce pressure for greenfield release and support sustainable patterns of development. The proposal responds directly to this objective by maximising the use of the existing built form while avoiding outward expansion of the developed footprint. In sustainability terms, the scheme therefore represents an inherently efficient form of development.
- 5.4 The proposal results in a slight reduction in floor space with no additional floorspace proposed. A schedule of accommodation is provided below.



Figure 2. Existing Site plan



Proposed Accommodation Schedule

Plot Number	Bedrooms	Persons	GIA sqm	Style
1	4	8	149	detached, two-storey
2	3	5	102	semi-detached, single storey
3	4	8	166	semi-detached, single storey
4	3	6	128	semi-detached, single storey
5	4	8	133	semi-detached, single storey
6	2	4	84	terraced, single storey
7	3	6	101	terraced, single storey
8	3	6	100	terraced, single storey
9	1	2	59	terraced, single storey
10	3	5	96	detached, single storey
11	1	2	52	flat, two storey
12	1	2	59	flat, two storey
13	3	6	102	single-storey unit attached to Plots 11 and 12
14	2	4	85	terraced, single storey
15	2	4	102	terraced, single storey
16	2	3	62	terraced, single storey
17	2	3	66	terraced, single storey
18	2	3	64	terraced, single storey
19	2	3	62	terraced, single storey
20	3	6	95	semi-detached, single storey
21	2	4	80	semi-detached, single storey
22	3	5	105	terraced, two storey
23	3	6	115	terraced, two storey
24	3	6	116	terraced, two storey
25	3	5	105	terraced, two storey



- 5.5 The proposal would deliver a balanced mix of one, two, three and four-bed dwellings that responds appropriately to identified housing needs within the district. The emphasis on two and three-bed homes aligns with strategic housing market demand and supports a broad demographic including smaller households, downsizers and family occupiers. At the same time, the restrained proportion of larger dwellings avoids the creation of an uncharacteristic enclave of high-value executive housing within a rural edge location. This balanced composition reflects both policy objectives and the physical constraints of converting existing buildings.
- 5.6 The development would result in a low residential density of approximately 14 no. dwellings per hectare across the 1.85-hectare site. Such a density is materially below that associated with typical suburban estate development and is instead characteristic of conversion-led schemes in edge-of-settlement or countryside contexts. The modest density assists in preserving openness within the site, maintaining landscape containment, reducing visual prominence and ensuring compatibility with surrounding development patterns. In planning terms, this low-intensity form of development further limits the weight of any countryside policy conflict. Whilst ensuring the vacant buildings are utilised in a meaningful way.
- 5.7 The proposal retains the existing scale, form and external appearance of the former care village buildings, with only limited ancillary structures proposed and minor changes to some fenestrations. By avoiding substantial extensions or new residential blocks, the development preserves the established character of the site and its relationship with neighbouring properties and the wider landscape. The conversion-led approach also ensures that potential impacts relating to overlooking, dominance and visual intrusion remain inherently constrained, thereby safeguarding residential amenity for future occupants.
- 5.8 Access arrangements would continue to utilise the established vehicular access from Eastergate Lane, with parking, visitor provision, accessible spaces, cycle storage, refuse facilities, play and ecology areas are accommodated within the site. The continued use of established access infrastructure, together with the absence of significant intensification of built form, ensures that highway safety and local traffic conditions would not be materially harmed. Technical matters including drainage, flood risk, biodiversity, arboriculture, environmental protection, biodiversity net gain and minerals safeguarding are addressed through the accompanying specialist assessments, all of which demonstrate that impacts can be appropriately mitigated and are acceptable in planning terms.

Affordable Housing Statement and Vacant Building Credit

- 5.9 In this instance the usual requirements of ADC LP policies H DM1 and AH SP2 around affordable housing are outweighed by the material considerations provided within the NPPF and PPG with regards to Vacant Building Credit. Paragraph 65 of the NPPF states that:

Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.

- 5.10 Footnote 30 deals with what is a proportionate amount and states: *Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned, or to major development within or released from the Green Belt.* The PPG provides additional guidance on Vacant Building Credit in the section dealing with Planning Obligations stating;

National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross





floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.

- 5.11 The PPG confirms that the Vacant Building Credit will only apply to buildings that have not been abandoned. In the case of Freemans Close, the existing buildings are in sound condition and have become vacant primarily due to the financial challenges of the C2 use. The existing buildings at Freemans have not been abandoned, being vacant for a limited time and they could return to their existing C2 use without the need for planning permission. Due to the challenges of the site and sector around staffing, the previous owners made the difficult decision to close the site, in August 2024 with the buildings becoming vacant in September 2024. The previous owners account for significant financial loss the year ending March 2023 which made the charity operation at this site unsustainable.
- 5.12 In the case of Freeman Close Vacant Building Credit is applicable and therefore, in line with the NPPF the proposal looks to offset the existing floorspace. This proposal involves the conversion of the existing floor space with internal and fenestration and external material alterations only. The proposed floor space is less than the existing and therefore the net gain would be zero. The car ports are open sided and therefore not attributed to additional floorspace.
- 5.13 The proposal qualifies for Vacant Building Credit as it comprises the conversion of existing buildings without a net increase floorspace. The buildings have not been abandoned and remain capable of lawful residential occupation. In accordance with national policy and guidance, the existing floorspace can therefore be offset against any affordable housing requirement, resulting in no affordable housing contribution being necessary. This outcome reflects the Framework's objective of incentivising the reuse of vacant brownfield buildings and carries substantial weight in favour of the development. The related ADC pre-application enquiry confirms this as a suitable approach.
- 5.14 Notwithstanding the Applicant has been mindful to facilitate a policy compliant housing mix across the site whilst also accounting for the parish consultation carried out in line with ADC case officer advice at pre-application stage.
- 5.15 Arun District Council's Housing Market Model and Core Strategy (Updated Housing Needs Evidence, 2016, Table 29) provides guidance on the appropriate mix of new housing within the District. The evidence highlights a clear emphasis on the delivery of smaller homes, particularly 2 and 3-bed properties, in order to meet identified local needs and support the creation of a balanced housing stock. An extract of Table 29 is provided below:



Table 29:	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Tenure				
Market	5–10%	40–45%	35–40%	10–15%
Intermediate/Starter Homes	15–20%	50–55%	25–30%	0–5%
Affordable Rented	35–40%	35–40%	15–20%	5–10%

- 5.16 Previously, under the pre-application enquiry, Arun District Council's recognised the potential of the scheme to deliver much needed housing stock on an existing site in a sustainable location. The scheme has been amended since the pre-app and subsequent consultation with the parishes to ensure a greater number of smaller dwellings. The proposed 25 dwellings sit across the below housing mix. A policy complaint project that affords meaning full contributions to the national and local desire for smaller units while ensuring that the proposal remains viable and provides equilibrium across all three tiers of sustainable development.

Dwelling Size	Number	% of Market Dwellings
1 bedroom	3	12%
2 bedrooms	8	32%
3 bedrooms	11	44%
4+ bedrooms	3	12%

Design & Appearance

- 5.17 The proposed development is founded on the sensitive reuse and adaptation of an established group of buildings that were purpose-built for residential occupation. The design approach is therefore one of continuity rather than replacement, retaining the essential form, massing and domestic architectural character of the existing care village while enabling its viable long-term residential reuse.
- 5.18 The submitted floor plans demonstrate that internal reconfiguration has been carefully considered to provide functional, policy-compliant dwellings with clearly defined living, sleeping and service spaces arranged around generous kitchen and living areas. A range of dwelling sizes is achieved across the converted buildings, including family homes and smaller units suited to downsizers or single occupants, ensuring that the architecture continues to read as a coherent residential environment rather than a fragmented redevelopment.
- 5.19 Externally, the elevations confirm that the scale, roof forms and material palette remain consistent with the established vernacular character of the site, including pitched tiled roofs, articulated façades, domestic window proportions and modest porch features. Openings such as bi-fold doors and replacement windows are introduced in a controlled manner that enhances residential amenity without materially altering the overall appearance of the buildings.





- 5.20 Across the wider site, the architectural treatment remains unified, with converted terraces and detached elements maintaining consistent ridge heights, roof geometry and rhythm to the façades. This continuity reinforces the perception of the planned residential settlement embedded within landscaped surroundings rather than new encroachment into open countryside.
- 5.21 The overall design response is therefore appropriately modest, landscape-led and respectful of the site's established character. It accords with design policies that require development to respond positively to local context, protect visual amenity and achieve high-quality living environments.

Layout & Scale

- 5.22 The proposed layout retains the historic spatial structure of the former care village, with buildings arranged around internal access routes and landscaped communal spaces. This established pattern provides clear legibility, secure private areas and natural surveillance while avoiding the introduction of new building footprints beyond the developed envelope of the site.
- 5.23 The hard and soft landscaping strategy demonstrates a landscape-led layout in which private gardens, communal green space, tree retention and new planting and play areas collectively frame the built form and soften views within and beyond the site. Areas of public grass, planting, wildflower habitat and pedestrian routes reinforce the residential character while supporting biodiversity enhancement and visual integration with the surrounding countryside.
- 5.24 The scale of development remains intentionally low. With a site area of approximately 1.85 hectares and 25 no. dwellings proposed, the resulting density is modest and characteristic of rural edge or conversion schemes. Built form is broken into smaller clusters and terraces rather than continuous massing, ensuring that openness, spacing and landscape dominance are preserved.
- 5.25 Ancillary structures such as car ports and bin stores are lightweight in appearance and subservient in scale, designed to sit comfortably within the landscaped setting without competing visually with the principal buildings. The retained layout and restrained scale therefore ensure that the proposal preserves the spatial character of the site, limits landscape impact and maintains the visual containment expected of development within a countryside setting. The proposed site layout is illustrated at figure 3.



Figure 3. Proposed Site Plan



Access & Parking

- 5.26 Vehicular access to the site is taken from the established access point on Eastergate Lane, which historically served the former residential care use. The proposal does not alter the position or operation of this access, thereby avoiding new highway impacts and maintaining continuity with the lawful use of the land.
- 5.27 Parking provision is accommodated entirely within the site and comprises 62 no. residential spaces together with 8 no. visitor spaces and 3 no. accessible bays. This level of provision reflects the site's semi-rural context and ensures that parking demand can be met without overspill onto surrounding roads, while integrated car ports provide weather protection and visual containment within the landscape framework.
- 5.28 Cycle storage and refuse facilities are distributed conveniently in relation to individual dwellings, supporting sustainable travel choices and day-to-day residential functionality. The overall access and parking strategy is therefore appropriate in scale, policy-compliant and consistent with the historic operation of the site.
- 5.29 The submitted Transport Statement by Nick Culhane Highway Consultant Ltd April 2026 asserts that a seven-day traffic survey on Eastergate Lane recorded average vehicle speeds of approximately 30mph in both directions, with 85th percentile speeds of 34.7mph eastbound and 34.9mph westbound, confirming that the existing access can achieve the required 2.4m x 53m visibility splays. Traffic modelling using TRICS data estimates that the existing care home could generate around 77 daily vehicle movements, whereas the proposed residential development is forecast to generate approximately 124 daily vehicle movements, including 14 two-way trips in the AM peak hour and 12 two-way trips in the PM peak hour. The report concludes that the uplift is modest and unlikely to adversely affect highway capacity or safety. Importantly, there have been no recorded personal injury accidents within the vicinity of the site during the last five years, and the development benefits from an established access, good connectivity to the wider road network, proximity to local services, and access to public transport. Overall, the report finds the proposal compliant with local transport policies and the National Planning Policy Framework, with no highway safety or capacity objections.

Drainage & Flood Risk

- 5.30 The submitted Flood Risk Assessment concludes that the proposed change of use of Freeman Close from a care facility (Use Class C2) to 25 dwellings (Use Class C3) is acceptable in flood risk terms. The site is located entirely within Flood Zone 1, indicating a low probability of fluvial or tidal flooding, and lies outside the Environment Agency's Flood Zones plus Climate Change extent. While the site is identified as being subject to localised areas of surface water flood risk, this is generally limited to shallow ponding (up to 0.3m depth) in isolated low-lying areas, primarily along parts of the access road and adjacent to the eastern boundary, with no significant increase in risk anticipated under future climate change scenarios. There are no recorded historic flood events affecting the site, no nearby flood storage areas or formal flood defences, and no evidence of significant risk from groundwater, sewer, reservoir or other flooding sources. As the proposal involves the conversion of existing buildings with no basement accommodation and no loss of floodplain storage, the development will not increase flood risk elsewhere. The FRA confirms that safe access and egress can be maintained during flood events and recommends the incorporation of proportionate flood resilience measures. Accordingly, the assessment concludes that the development can be safely accommodated for its lifetime without increasing flood risk on or off site.
- 5.31 The submitted Foul and Surface Water Drainage Strategy and Lidsey Drainage Impact Assessment concludes that the proposed change of use of Freeman Close from a C2 care facility to 25 C3 dwellings can be accommodated without increasing flood risk or placing undue pressure on existing drainage infrastructure. Surface water from new impermeable areas will be attenuated within a combination of tanked permeable paving and cellular storage. Foul drainage will continue to utilise the existing connection to the Southern Water sewer network via the on-site pumping station, with the assessment demonstrating that the proposed residential use will generate significantly lower foul flows than the former care facility. The report confirms





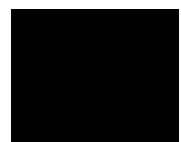
that surface water will be managed separately from the foul sewer network, accords with Arun Local Plan Policy W DM1 and the Lidsey Surface Water Management Plan, and will not result in any unacceptable impacts on drainage capacity, flood storage, flood flows, or the wider Lidsey Wastewater Treatment Works catchment.

Existing Buildings

- 5.32 The structural survey undertaken by Robert Pragnell, Chartered Structural and Civil Engineer found no evidence of settlement, subsidence, structural movement or distress, with roof lines remaining true, internal finishes free from cracking, doors operating correctly, and floors exhibiting no excessive deflection. The buildings were originally constructed for residential institutional use and are therefore capable of accommodating the proposed residential conversion without the need for structural strengthening works. The report confirms that only limited and routine alterations will be required, including the formation of party walls within roof spaces, local floor modifications for stair openings, infilling of redundant stair voids, and the removal of existing links between buildings. These works are described as straightforward construction activities that can be undertaken using conventional building methods. Furthermore, the site benefits from very low flood risk and ground conditions suitable for traditional foundations. Overall, the survey provides robust evidence that the existing buildings are in good structural condition and that the proposed residential conversion is both practical and structurally feasible.

Landscape & Biodiversity

- 5.33 The proposed development is inherently landscape-led, arising from the reuse of an established group of buildings set within mature grounds rather than the introduction of new built form into open countryside. As a consequence, the existing spatial structure of planted boundaries, internal green spaces and tree cover is largely retained, ensuring continuity of landscape character and visual containment.
- 5.34 The hard and soft landscaping proposals reinforce this approach through the retention of established vegetation and the introduction of complementary planting, including native tree and shrub species, areas of grassland and habitat-enhancing wildflower planting. Collectively, these measures strengthen the verdant setting of the site, soften views of built form and contribute positively to local landscape character and ensure suitable on site Biodiversity Net Gain uplift.
- 5.35 The scale and distribution of development, together with the modest residential density, ensure that landscape openness within the site is preserved and that the perception of development remains that of a contained cluster of residential properties embedded within greenery. The proposal therefore avoids material adverse effects on the wider countryside setting or the character of the surrounding area.
- 5.36 Arboricultural considerations have informed the design process, with the layout responding to the position and quality of existing trees. Retention of important specimens maintains established canopy structure and visual screening, while any necessary removals would be offset through replacement planting to secure long-term landscape continuity and resilience.
- 5.37 Ecological enhancements are incorporated alongside landscape proposals, supporting biodiversity within the site and contributing toward measurable biodiversity net gain in accordance with national policy objectives. The combination of habitat retention, new planting and sensitive site management provides opportunities for wildlife movement, foraging and nesting, thereby delivering environmental benefits beyond the existing baseline condition.
- 5.38 When considered as a whole, the proposal conserves and enhances landscape character, protects existing trees where possible. The proposal delivers biodiversity improvements consistent with the environmental objectives of the National Planning Policy Framework and the Development Plan. Landscape, arboricultural and ecological considerations therefore weigh positively in the overall planning balance.





- 5.39 Ecological Assessment prepared by The Ecology Co-operation Ltd and issued on 26 March 2026 confirms that as the proposal is unlikely to result in significant adverse ecological impacts, as the existing habitats and overall ecological character of the site will be largely retained.
- 5.40 A Biodiversity Impact Calculation (BIC) has been undertaken by The Ecology Co-operation Ltd using the Statutory Biodiversity Metric to assess the biodiversity implications of the proposal. The completed Statutory Biodiversity Metric demonstrates that the development will deliver a net gain of 0.73 habitat units, equating to a 10.68% increase in habitat value, together with a gain of 0.22 hedgerow units, representing a 24.98% increase in hedgerow value. The assessment confirms that the scheme satisfies the Statutory Biodiversity Metric trading rules and exceeds the mandatory 10% Biodiversity Net Gain requirement introduced through the Environment Act 2021. Accordingly, the proposed development will not only avoid significant ecological harm but will secure measurable and lasting biodiversity enhancements, in accordance with the requirements of the National Planning Policy Framework, the Environment Act 2021 and Policy ENV DM5 of the Arun Local Plan.

Community, Residential Amenity & Living Conditions

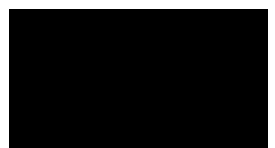
- 5.41 The proposed development has been carefully designed to secure a high standard of living conditions for both future occupiers of the site and residents of neighbouring properties. As the scheme is founded on the conversion of an established group of residential-scale buildings within a generous landscaped setting, the spatial relationships that define privacy, outlook and separation are largely retained. This inherent characteristic of the site materially limits the potential for adverse amenity effects.
- 5.42 Internally, the converted dwellings provide clearly defined and functional living environments comprising appropriately sized bedrooms, living areas, kitchens and sanitary accommodation arranged to meet modern residential expectations. The range of dwelling sizes supports a mixed residential community while ensuring that all units achieve suitable levels of daylight and outlook consistent with adopted space and amenity standards.
- 5.43 Accommodation for older people, a policy supported by the ADC accommodation for older people and people with disabilities (2019) SPD - it is important to highlight that 18 of the 25 proposed units are single-storey units amounting to 72% of the proposal affording single storey living.
- 5.44 Private and communal amenity spaces are incorporated within the retained site layout, allowing residents access to outdoor space for recreation, relaxation and day-to-day domestic use. The mature landscaped character of the site enhances residential quality and contributes positively to wellbeing, consistent with national planning objectives relating to healthy and inclusive places.
- 5.45 Noise, disturbance and general activity associated with the proposed residential use are comparable to, and in many respects less intensive than, the historic residential care operation. The proposal therefore represents a compatible and appropriate form of occupation within the surrounding residential context and would not give rise to unacceptable impacts on neighbouring amenity.
- 5.46 Overall, the proposal provides a high-quality residential environment that safeguards the amenity of existing residents while delivering suitable living conditions for future occupiers. The development is therefore consistent with relevant Development Plan policies relating to design quality, residential amenity and the creation of sustainable communities, and this matter weighs positively in the overall planning balance.





Sustainable Development

- 5.47 The National Planning Policy Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development through the delivery of social, economic and environmental objectives. The proposed redevelopment of Freeman Close has been assessed against these three interrelated strands of sustainability and is considered to deliver clear and demonstrable benefits in each respect.
- 5.48 In social terms, the proposal would provide 25 no. additional dwellings within a district that is currently unable to demonstrate a five-year supply of deliverable housing sites. The scheme delivers a balanced mix of dwelling sizes capable of meeting a range of local housing needs, including smaller households, downsizers and family occupiers. By bringing a vacant residential complex back into productive use, the development would also contribute to community vitality and the efficient use of existing infrastructure.
- 5.49 Economically, the proposal would support activity associated with construction, refurbishment and long-term occupation of the site, generating employment and expenditure within the local area. The productive reuse of vacant buildings represents an efficient use of existing building and their longevity.
- 5.50 Environmentally, the development secures the reuse of previously developed land and existing buildings and improvements to ensure the buildings function to current thermal and renewable energy standards. The retention and enhancement of landscape structure, protection of trees and delivery of biodiversity enhancements collectively ensure that the proposal conserves and improves environmental quality. Technical assessments further confirm that the development is acceptable in relation to drainage, flood risk, highway safety and residential amenity.
- 5.51 The proposal also qualifies for the application of Vacant Building Credit, reflecting national policy support for the reuse of redundant brownfield buildings and confirming that the absence of an affordable housing contribution is justified in this instance due to the absence of any net increase in floorspace.
- 5.53 When considered in the round, the proposal delivers meaningful social, economic and environmental benefits that are consistent with the core objectives of the National Planning Policy Framework and the Development Plan. These benefits attract substantial weight in the planning balance and reinforce the conclusion that the development constitutes sustainable development for which planning permission should be granted.





6.0 PLANNING BALANCE

- 6.1 The proposed development must be assessed in the context of the presumption in favour of sustainable development set out in the National Planning Policy Framework. The Council is presently unable to demonstrate a five-year supply of deliverable housing sites and, consequently, the policies most important for determining this application are to be considered out of date. In accordance with paragraph 11(d) of the Framework, planning permission should therefore be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.
- 6.2 The primary policy tension arises from the site's location outside the defined Built-Up Area Boundary and within the countryside for planning policy purposes. However, the proposal does not extend built development into undeveloped land. Instead, it involves the reuse and conversion of an established complex of permanent buildings that were purpose-built for residential occupation, and which remain physically contained within an existing developed site. The scale of policy conflict is therefore limited and attracts only moderate weight in the overall planning balance.
- 6.3 Set against this limited harm are a series of clear and substantial benefits. The proposal would secure the effective reuse of previously developed land and bring a vacant site back into productive use, consistent with national policy objectives. It would deliver 25 no. additional dwellings in a context of constrained housing supply, contributing meaningfully to the district's housing delivery. The scheme provides a balanced mix of dwelling sizes aligned with local housing need, achieves a low residential density appropriate to its rural edge context, and retains the established character and appearance of the site.
- 6.4 The development would not give rise to significant adverse effects in relation to landscape character, neighbouring residential amenity, highway safety, biodiversity, drainage, flood risk or other environmental considerations, as demonstrated through the accompanying technical evidence. Furthermore, the proposal qualifies for the application of Vacant Building Credit, reflecting the sustainable reuse of existing buildings and confirming that the absence of affordable housing provision is justified in policy terms.
- 6.5 When assessed in the round, the social, economic and environmental benefits of the proposal are significant and attract substantial weight. These benefits clearly and demonstrably outweigh the limited policy tension associated with the countryside location when assessed against the National Planning Policy Framework taken as a whole.
- 6.6 The proposal therefore constitutes sustainable development, and the presumption in favour of sustainable development indicates that planning permission should be granted.





7.0 CONCLUSION

- 7.1 This application seeks planning permission for the change of use and conversion of an existing vacant former residential care village (Use Class C2) to provide 25 dwellings (Use Class C3), together with associated parking, landscaping, car ports, cycle storage, refuse facilities and ancillary works.
- 7.2 The proposal represents the sustainable re-use of a previously developed site that has been occupied by permanent buildings and associated infrastructure for several decades. The scheme makes effective use of an existing developed site and secures the long-term beneficial use of buildings that would otherwise remain vacant and at risk of deterioration.
- 7.3 Importantly, the development does not involve significant expansion of the site, substantial new built form or encroachment into undeveloped countryside. The existing buildings are retained and converted within their established footprint, preserving the site's character, scale and spatial relationship with surrounding development. The proposal therefore differs materially from a conventional greenfield housing scheme and results in only limited physical change to the appearance of the site.
- 7.4 The development has been informed by pre-application discussions with Arun District Council and engagement with local stakeholders. The scheme has evolved to respond to comments received and provides a balanced mix of dwellings that will contribute towards identified housing needs within the District. The proposal also makes efficient use of existing infrastructure, access arrangements and previously developed land, consistent with the objectives of national planning policy.
- 7.5 The proposal has been assessed against the relevant provisions of the National Planning Policy Framework, the Arun Local Plan, the Walberton Neighbourhood Plan, the Barnham and Eastergate Neighbourhood Plan and other material planning considerations. Whilst it is acknowledged that some tension arises with elements of countryside policy, the development involves the conversion and re-use of existing permanent buildings rather than the creation of a new residential development in an undeveloped countryside location.
- 7.6 The site is located within a district where the Council is currently unable to demonstrate a five-year supply of deliverable housing land. Consequently, the presumption in favour of sustainable development set out within Paragraph 11 of the National Planning Policy Framework is engaged. The proposal would make a meaningful contribution towards housing delivery whilst utilising an existing developed site and avoiding the need for additional greenfield land release.
- 7.7 The scheme will deliver a range of social, economic and environmental benefits. These include the provision of 25 additional dwellings, the re-use of a vacant site, investment in the refurbishment of existing buildings, support for the local economy through construction activity, biodiversity and landscape enhancements, and the continued productive use of an established residential complex.
- 7.8 Having regard to the Development Plan as a whole, the National Planning Policy Framework and all other material considerations, it is considered that the benefits of the proposal significantly outweigh any limited policy conflict that may arise. The development represents a sustainable and appropriate form of development that secures the future of a vacant site while delivering much-needed housing in a highly sustainable manner.

