

Richard Temple
Senior Planning Officer
Directorate of Place
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

22 January 2018

Dear Mr Temple,

**LAND EAST OF WANDLEYS LANE (WA/73/17/OUT)
REPRESENTATIONS TO PLANNING APPLICATION**

CBRE act on behalf of HF Trust Limited ("HFT") in respect of their facility at Freeman Close in Walberton which is located to the south of this application site (land east of Wandleys Lane) as submitted by Welbeck Strategic Land II LLP (hereafter referred to as the "Welbeck site"). HFT also own the land immediately to the south of the application site (Wandleys Copse) and some fields between the application site and their Freeman Close facility. A plan of our clients site and ownership is included at **Appendix 1** of this letter.

HFT is a registered national charity providing local support to people with learning disabilities, their families and carers. HFT is one of the largest and longest established charities supporting people with learning disabilities. Our Client operates a number of specialist care facilities across England providing supported living, residential care and short break services. At the Freeman Close facility, HFT offer residential care and day opportunities which helps people with disabilities experience life to the full from enjoyment, satisfaction and improved health to finding meaningful relationships or paid employment.

Having reviewed a number of the application submission documents, HFT support the principle of development proposed in the application and wish to make some comments in respect of the proposed development. The remainder of this letter sets these out.

Sustainable Location

We understand that one of the main concerns of the Council regarding this application is its sustainability of location in that it is located outside of the built-up area of Fontwell. NPPF Paragraph 7 identifies sustainable development as having three roles: economic, social and environmental.

It is our clients view that the proposed development achieves all three roles of sustainable development.

An application located immediately to the west of this application site and made on behalf of Fontwell Estates (hereafter referred to as 'the Fontwell Estates site') for 400 dwellings, 500sqm of non-residential floorspace (A1, A2, A3, D1 and/or, D2), 5,000sqm of light industrial (B1b/c) and associated works (Appeal reference: APP/C3810/V/16/3143095). The application was recommended for approval by Arun District Council, and then called-in by the Secretary of State with a decision issued on 13 July 2017. This appeal

is relevant to this application considering its close proximity to the application site and the main issues considered by both the Inspector and Secretary of State, particularly in relation to sustainability.

One of the main issues of the appeal was whether the proposal is a sustainable location for development and whether it would maximise sustainable transport solutions. At paragraph 19 of the Secretary of State's decision, it is stated that *'he agrees with the Inspector that he has no reason to disagree with the parties that Fontwell is a sustainable location for development'*. This points us to paragraphs 11.14 and 11.15 of the Inspectors Report which states the following:

11.14 *'different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas'*.

11.15 *'I have no reason to disagree with the parties that Fontwell is a sustainable location for development. Thus, it is a question of whether the proposal, given the nature and location of the site, has taken opportunities for sustainable transport modes and if so have they reduced the need for major transport infrastructure? This is a rural area where, in my view, it is a first principle that such sites will not minimise the need to travel and make maximum use of sustainable transport modes to the same extent as a town centre or edge-of-centre site would'*.

This is reflected in NPPF paragraph 32 (2nd bullet) which recognises that account should be had to whether *"opportunities for sustainable transport modes have been taken up depending on the nature and location of the site"*. It is understood that measuring sustainability should not be the same for urban and rural locations as they are very different in their location and nature. People who choose to live in rural areas are generally more willing to travel further by private car to reach facilities such as schools and shops, or fit around the public transport opportunities where possible by opting into a more 'rural way of life'. Therefore the proximity and ease of access to services by non-car modes of transport should not be assessed in exactly the same way as if the application were made in an urban area.

The contributions towards bus services proposed in this application build upon those already permitted through the Fontwell Estates site. This will improve the connectivity of both sites to services and facilities and therefore this application should not be seen as unsustainable where the contributions to sustainable transport measures are consistent with those already permitted. Even though this is a rural site, sustainable non-car transport modes have been considered and provided as appropriate.

HFT considers that improvements to the bus facilities in the vicinity is a benefit to their operation at Freeman Close as it will assist in enabling their employees to travel to work and for visitors to travel without the need of a private car. This will contribute towards HFT continuing to operate successfully and provide the necessary services at this location. This therefore contributes to **economic and environmental sustainability** by supporting businesses / services in the local area and reducing reliance on the private car.

Furthermore, the officers report to the Fontwell Estates application considered that the application site was in a sustainable location with access to local services and amenities e.g. post office, newsagents, café / restaurant etc. It was also noted that there are two GP services within 2km of the application site. Given that the Fontwell Estates site is located 450m (from the centre of each site) to the west of the Welbeck application site, the location to those identified services is not substantially different and therefore would be unreasonable to be argued on the contrary.

Affordable Housing and Housing Provision

This application seeks to provide 30% (48no.) affordable housing. Not only is this policy compliant (adopted and emerging policy), but it contributes towards the significant affordable housing need within the District. There has been an average delivery of 124 affordable homes per annum over the past 10 years (AMR 2015-16) which is well below the level of affordable housing need in the District. This scheme will contribute towards increasing this and enabling the Council to meet its identified need of 480 affordable homes per annum (Updated Housing Needs Evidence: GL Hearn September 2016).

The provision of additional market housing in this location is significantly boosting housing land supply as promoted through NPPF Paragraph 47. We are aware that Arun District Council could not demonstrate either a 3 or 5 year housing supply in March 2017, and this was confirmed in three decisions in September 2017. However, an update to the 5 Year Housing Land Supply (5YHLS) Statement in September 2017 concludes that the District now has a 5.3 year supply of deliverable housing land. Whilst we have not sought to undertake any detailed interrogation of the 5YHLS as part of this response, we note that a number of the strategic sites which are being relied upon in the trajectory do not yet have planning permission. Some of these strategic allocations have had an outline application in the system for over a year and some have not yet submitted planning applications. Dwellings from SD10 are also counted towards the 5YHLS despite the outline application receiving refusal from the Council in September 2017. It is therefore questionable whether the Council has a robust deliverable supply of housing land. HFT therefore agree with section 5.5.11 of ECE's planning statement that the housing land supply should be front-loaded to ensure that sufficient housing can be delivered at the appropriate time.

HFT considers that the provision of housing in this location will extend their pool of potential employees. Currently the Trust finds it difficult to find employees to be based at their facility at Freeman Close and also at Chestnut House, Barnham. New housing development within this area could provide local employment opportunities for new residents and new services / facilities that may come forward as a result of housing development will be available to and assist the Trust to continue operating from its current location.

The delivery of market and affordable housing at this location therefore contributes towards **social and economic sustainability**.

Ancient Woodland

Wandley's Copse, to the south of the application site, is in the ownership of HFT. We note from the submitted indicative masterplan that a 15m buffer is proposed between the copse and the development with the provision of bird and bat boxes on the trees on the perimeter. This level of protection is welcomed by HFT. However it should also be noted that should land to the south of this application come forward for development in the future then this copse could have paths marked through to improve connectivity and become an area of informal open space encouraging active and healthy communities. The potential for this should be appropriately safeguarded as part of the proposals, including through any approved masterplan (i.e. indicate potential routes into the copse area).

The points raised above provide justification to HFT's support of the application to the east of Wandleys Lane. It is HFT's contention that this is a sustainable site for development and therefore should not maintain a reason for refusal.

We trust that the above comments will be taken into consideration in determining the application. Should you have any queries regarding this letter or our client's interest then please contact me or my colleague Richard Brown [REDACTED]

Yours sincerely,



**GRACE ALLEN
PLANNER**

FOR AND ON BEHALF OF CBRE LTD.