

Arundel Neighbourhood Plan 2014-2029

Site Assessments Report



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November 2013

ARUNDEL NEIGHBOURHOOD PLAN

SITE ASSESSMENTS REPORT

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Introduction

The purpose of this report is to provide a summary of sites assessed as suitable for allocating for housing development in Policy 4 and Policy 5 of the Submission Arundel Neighbourhood Plan (ANP).

Methodology

The assessment builds on the legacy of the 2012 Arun Strategic Housing Land Availability Assessment (SHLAA) and adapts the methodology for strategic housing land availability assessment documents, outlined in the good practice document published by DCLG in 2007, to suit the distinct needs of a neighbourhood plan.

It comprises an assessment of those sites assessed as potentially suitable in the SHLAA and other sites identified as part of the community survey and planning workshop. In doing so, it qualifies, where relevant, the assessment made in the SHLAA and it applies a finer grain of assessment in accordance with the site selection criteria proposed in Policy 3 of the Plan.

The report supersedes the information contained in the first and second versions of the report published alongside the Pre Submission Plan in May 2013 and the Revised Pre Submission Plan in September 2013. It also includes an assessment of the acceptability of each site to reflect the importance of the Plan having to achieve a majority vote at a referendum.

All other sites assessed as unsuitable for housing development in the SHLAA have been excluded from assessment in this report.

Statement on Managing Flood Risk

It is acknowledged that some sites assessed in this report lie within areas identified by the Environment Agency as subject to fluvial and/or tidal flood risk.

In such circumstances, the NPPF requires a Sequential Test is undertaken with the aim of steering new development to areas with the lowest probability of flooding. It states “development should not be allocated ... if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding” (para. 101).

The NPPF then states “if, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied” (para.102). For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk and a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. It requires both elements of the test will have to be passed for development to be allocated.

The proposed Policy 3 of the ANP sets out the housing site selection criteria. It establishes the primacy of reusing brownfield land within the existing built up area boundary of Arundel as a policy objective. In doing so, the ANP can demonstrate it will contribute to the achievement of sustainable development and not depend on greenfield sites outside of the boundary for this purpose.

In which case, only sites that meet the criteria of Policy 3 are allocated or supported for housing development. By definition, the policy accepts that in applying a Sequential Test there are “wider sustainability objectives” to justify the identification of sites with a higher probability of flooding than other sites that do not meet its criteria.

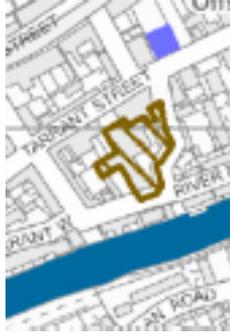
Policy 4 therefore proposes the allocation of Land at Ford Road for housing development and Policy 5 supports the redevelopment of Land at Fitzalan Road for housing development. Both sites are located in either Flood Zone 2 (at risk of a 1 in 100 year fluvial and/or tidal flood risk event with climate change) or Flood Zone 3 ((at risk of a 1 in 50 year fluvial and/or tidal flood risk event with climate change), though in both cases the land is protected by existing flood defences, for which there is a strategy for upgrading in the coming years.

The policies set out the respective benefits of targeting the two sites for redevelopment. The Ford Road site has been derelict for many years in a prominent location in a residential area. The Fitzalan Road site has longer term potential to relocate a general industrial use that is no longer suited to this location given the close proximity of adjoining residential development. Both sites could and should be a valuable land resource for meeting the town’s housing needs in an area of high environmental constraint. In applying the Exception Test, there is a clear case, supported by the local community, for the benefits of development outweighing the flood risk, especially in the light of the specific plans of the Lower Tidal River Arun Strategy to invest in upgrading the town’s flood defences to address climate change.

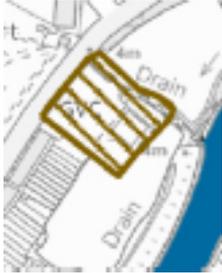
Further, both Policies 4 and 5 acknowledge that managing flood risk on each site must be addressed and both require proposals to include a flood risk assessment that demonstrates the development will be safe for its lifetime taking account of the vulnerability of its users and without increasing flood risk elsewhere.

The development capacity assessment work undertaken on each site for the purpose of this report indicates that both sites are capable of making satisfactory arrangements to manage future flood events. In the event that future planning applications cannot, in due course, make such provisions to the satisfaction of the local planning authority and are refused consent, then this will be taken into account in a future review of the ANP.

Arundel Neighbourhood Plan Steering Group

SHLAA Site Reference	AB6
Location	River Road ('Bevin & Bevin'), Arundel (see Proposals Map Inset B) 
Use(s)	Vacant industrial
Gross Site Area (Ha)	0.20 Ha
Suitability	The site is located within the built up area boundary was previously used as a brewery and for other general industrial purposes. It is suited to residential development, provided the scheme accords with listed building, conservation area and setting of Arundel design policies and satisfactory access. It is surrounded by other residential development and is outside the proposed secondary shopping frontage. Its retention as a B1 use would not be suitable, given the tight access to the site and of River Road.
Availability	The site is now available for development immediately. It is understood a planning application for 13 dwellings is being prepared for submission before the end of 2013 indicating that the land is available for development in the next five years.
Achievability	<p>The site has many constraints that will influence its financial viability. Aside from the various heritage asset policy constraints, which will extend beyond the listed former brewery building in the centre of the site to its full curtilage, vehicle access is problematic and there is likely to be a need for decontamination as well as demolition works.</p> <p>The cost of development will therefore be higher than a conventional green field site, to the extent that it may not be possible to meet the normal planning obligations of a residential scheme, e.g. affordable housing. If that is acceptable to the LPA then an above average density scheme (suited to this town centre location) to deliver c. 13 new homes should be viable.</p>
Acceptability	There were a number of representations in support of the Pre Submission Plan proposal to allocate this site.
Net Developable Area (Ha)	0.20 Ha

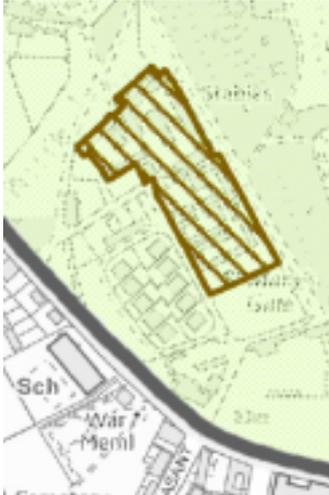
Site Density	60 dwellings per hectare = 13 total dwellings
Phasing	5 years: 13 6+ years: 0
Concluding Assessment	The site meets ANP Policy 3 criteria, is available and is achievable. It should therefore be allocated in the ANP.

SHLAA Site Reference	115
Location	Ford Road ('Old Gas Works'), Arundel (see Proposals Map Inset B) 
Use(s)	Former gas works
Gross Site Area (Ha)	0.43 Ha
Suitability	<p>The former gas works site is in the built up area boundary. The site is in Flood Zone 2 but benefits from the existing River Arun flood defences, for which there are firm plans to improve and upgrade during the plan period.</p> <p>As a result of its former use, it is expected the site will require remediation works as part of any development scheme to address onsite contamination and any leaching of contaminants off site. The site is well suited to a higher density housing use, given the residential character of Ford Road generally and the adjoining terrace in particular.</p> <p>The reclamation of a long-derelict gas works site is a strong policy objective in a town where land for development within the settlement is scarce.</p>
Availability	The land is available for development but there are land ownership issues that have to be resolved between the freeholder and the former gas works operator. The allocation of the site in the Plan will provide both with an important signal that a resolution is encouraged.

Achievability	<p>An initial development appraisal has been undertaken. It indicates that a scheme delivering 37 dwellings is achievable within the physical parameters of the site, without undermining the character of Ford Road or the setting of Arundel.</p> <p>Such a scheme will require an innovative design solution to tie the remediation strategy in to meeting off-street car parking and flood risk management requirements.</p>
Acceptability	There were many representations on the Pre Submission Plan that supported its proposed allocation of this land for housing development.
Net Developable Area (Ha)	0.43 Ha
Site Density	85 dwellings per hectare = 37 total dwellings
Phasing	5 years: 0 6+ years: 37
Concluding Assessment	The site meets ANP Policy 3 criteria, is available and is achievable. It should therefore be allocated in the ANP.

SHLAA Site Reference	AB10
Location	Fitzalan Road, Arundel (see Proposals Map Inset B) 
Use(s)	Industrial and residential
Gross Site Area (Ha)	0.39 Ha

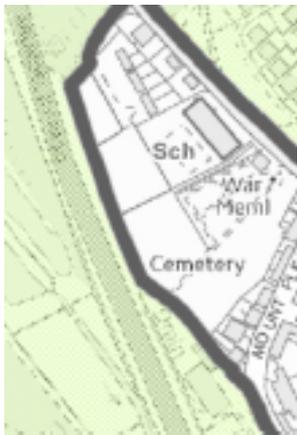
Suitability	<p>Land is in industrial use (0.25 Ha) and residential use (0.14 Ha). It is in the built up area boundary but in defended flood zone 3.</p> <p>Although still in active use, the change of use to residential of other sites in close proximity to this location in recent years has resulted in its industrial use no longer being well suited to its neighbours. It has a low employment density and is of a type of use for which there are many alternative and better suited locations close to the A27 in this part of West Sussex. The loss of employment land in this circumstance can therefore be justified. The older building along Fitzalan Road is of some historic and architectural interest and may be capable of being retained and converted as part of the scheme.</p> <p>The adjoining residential property comprises only one dwelling and is therefore capable of a more efficient scheme, especially if developed comprehensively with its industrial neighbour. A previous planning application on the site was refused on the grounds of inadequate flood risk arrangements. However, it is considered that a comprehensive scheme will enable a satisfactory scheme to be delivered.</p> <p>The redevelopment of the site will therefore depend on a flood risk assessment to demonstrate how such risk can be managed. A consented residential scheme in close proximity to the site suggests this is feasible in this location.</p>
Availability	<p>The land is not currently available for redevelopment but may become so during the plan period, if the ANP provides a signal to the owners and investors of its preferred use.</p>
Achievability	<p>The development costs in this location will be higher than normal, given the need to demolish some existing buildings, to address likely ground contamination and to manage flood risk. A comprehensive scheme covering the full extent of the site will require an equalisation agreement between land owners, but will improve scheme viability as well as deliver a better planning outcome.</p>
Net Developable Area (Ha)	0.39 Ha
Site Density	60 dwellings per hectare = 24 dwellings
Phasing	<p>5 years: 0 6+ years: 24</p>
Concluding Assessment	<p>Site meets ANP Policy 3 criteria and is achievable. However, it is currently in another established use and may not become available until later in the plan period. It should therefore be subject to another policy identifying its long term potential.</p>

SHLAA Site Reference	-
Location	<p>Castle Stables, Arundel (see Proposals Map Inset B)</p> 
Use(s)	Former commercial stables and ancillary land
Gross Site Area (Ha)	0.35 Ha
Suitability	<p>The land is occupied by buildings forming a vacant commercial stables associated with Arundel Castle and lies with the National Park boundary. The majority of buildings form a courtyard accessed from the main access road into the Castle grounds off London Road. They date from the mid 19th Century with some late 20th Century wooden structures adjoining the courtyard. One building – Deer House - is listed (Grade II); the remainder are within the curtilage of the Grade I and Scheduled Monument Castle and within the Arundel Conservation Area.</p> <p>The land is outside of, but adjoins, the built up area boundary of Arundel. Although of significant design sensitivity, housing development is suitable in principle as an appropriate means of bringing these important heritage assets back into beneficial long term use. The land is adjoined by residential development to its south west and many other buildings within the castle grounds have a residential purpose. The location of the courtyard is such that a residential use will not compromise the use of the castle and grounds for tourism purposes.</p> <p>The courtyard buildings may be converted into up to 12 dwellings and part of the adjoining land could be redeveloped for 4 dwellings and to create new amenity space. The landowner estimates that the number and type of vehicle movements of a housing scheme of this kind will be similar to those generated by the former commercial stables use. In which case, the existing access arrangements via a drive way to London Road (which currently serves a small number of other residential properties) should suffice.</p>
Availability	The landowner has indicated the land will be available for residential development in the period to 2019.

Achievability	The landowner has undertaken a preliminary assessment of the viability of a suitable conversion scheme of the courtyard buildings. The landowner's intention is for all the dwellings to be rented on the open market and as affordable units. This assessment has indicated a scheme is viable on this basis.
Acceptability	The local community has not yet been given the opportunity to consider the acceptability of using the stables for housing. However, it is considered that the community will welcome the reuse of this land for housing development.
Net Developable Area (Ha)	0.35 Ha
Site Density	45 dwellings/hectare
Phasing	5 years: 16 6+ years: 0
Concluding Assessment	The site meets ANP Policy 3 criteria, is available and is achievable. It should therefore be allocated in the ANP.

SHLAA Site Reference	59
Location	Torton Hill Road/Pearson Road, Arundel (see Proposals Map Inset B) 
Use(s)	Undeveloped land
Gross Site Area (Ha)	2.15 Ha
Suitability	The land is a greenfield site outside the built up area boundary and adjoins the National Park and an ancient woodland. The site has some heritage landscape value and is enjoyed by local people for informal recreation. A number of trees within the site are included in a Tree Protection Order. As such, the site is not considered suitable for housing development.

Availability	The landowner has indicated the land is available for residential development.
Achievability	A residential scheme may be viable though will require an access road to Pearson Road to be negotiated with a third party land owner and its steep land form may also add to development costs.
Acceptability	The majority of representations received on the Pre Submission Plan objected to the allocation of this site for housing, even though this was not proposed in the plan. This was a response to a recent consultation letter from the developer outlining proposals for development. In this light, it is inconceivable that allocating the site will be acceptable.
Net Developable Area (Ha)	n/a
Site Density	n/a
Phasing	n/a
Concluding Assessment	The site meets does not ANP Policy 3 suitability criteria although it is available and achievable. It should not therefore be allocated in the ANP.

SHLAA Site Reference	62, AB3 and AB4
Location	Anne Howard Gardens, Arundel (see Proposals Map Inset B) 
Use(s)	Undeveloped land and educational use
Gross Site Area (Ha)	0.72 Ha
Suitability	The site is currently undeveloped land and land used by the adjoining primary school for outdoor education space. It was assessed as three separate sites in the SHLAA. The land adjoins the National Park. The site is outside the built up area boundary and in partial education use would not normally meet development plan policy.

Availability	The landowner has indicated the land may available for residential development.
Achievability	The access to Anne Howard Gardens from these sites does not seem achievable without undermining the viability of the outdoor school uses.
Acceptability	The local community has not yet been given the opportunity to consider the acceptability of this site for housing. However, it is considered that the community will not welcome the loss of this land to housing development.
Net Developable Area (Ha)	n/a
Site Density	n/a
Phasing	n/a
Concluding Assessment	The site meets does not ANP Policy 3 suitability criteria although it is available and achievable. It should not therefore be allocated in the ANP.