



PLANNING COMMITTEE REPORT

TO: Planning Committee North

BY: Head of Development and Building Control

DATE: 4th October 2022

DEVELOPMENT: Change of use from a Religious Institution with bedrooms (Class C2) to accommodation for homeless persons (Sui Generis) for a temporary period of 5 years

SITE: Roffey Place, Old Crawley Road, Faygate, Horsham, West Sussex, RH12 4RU

WARD: Colgate and Rusper

APPLICATION: DC/22/0939

APPLICANT: **Name:** Ms Catherine Hill **Address:** Town Hall Chapel Road Worthing BN11 1HA

REASON FOR INCLUSION ON THE AGENDA: More than eight persons in different households have made written representations within the consultation period raising material planning considerations that are inconsistent with the recommendation of the Head of Development and Building Control.

RECOMMENDATION: To approve planning permission subject to appropriate conditions

1. THE PURPOSE OF THIS REPORT

To consider the planning application.

DESCRIPTION OF THE APPLICATION

- 1.1 The proposal seeks to change the use of two buildings (main building and the gatehouse) at Roffey Place to facilitate their use for short-term accommodation for local homeless people on a path out of homelessness. This proposed use is considered to be a Sui Generis use. The application does not include the main listed building of Roffey Place or its immediate curtilage.
- 1.2 The facility would provide a total of 50 single occupancy rooms across the two buildings, with 8 x bedrooms in the gatehouse, and 40 x bedrooms, 1 x 1-bed bedsit and 1 x 1-bedroom self-contained flat, within the main building. The site would be operated by Turning Tides, a charity which provides short-term accommodation for homeless people, offering skills and network support to enable a path out of homelessness with a view of independent living back within the community. Each room would be single occupancy, and lengths of occupancy is usually in the region of up to 6-9 months.

- 1.3 As part of the facility, staff would be on site 24-hours, including waking night staff. Residents would be supported by specialist clinical, counselling and well-being teams, accommodated within the ground-floor rooms. Additionally, the site has the capacity to offer a multi-agency support hub on the ground floor which providing complimentary support for the residents, including from the Council, Turning Tides and other staff during working hours.
- 1.4 The shelter would provide all meals for residents, referred to as 'full-board', including basic snacks. Although residents would be expected to prepare their own lunches, the food is provided as part of the catering provision within the shelter.
- 1.5 Aside from functional changes of the rooms within the two buildings identified, there will be no external changes to the buildings, no physical changes to the building structures or the site access and parking areas, aside from general tidying up of these areas.
- 1.6 It has been confirmed that the Listed Building, which was previously in use as part of the bible college, would not form part of the proposed change of use. This building is to remain outside of the applicant's ownership and vacant. Internally, the current connecting passage between the residential block and the listed building would be blocked off to prevent access. In the event of additional security measures being necessary to prevent unauthorised access to the listed building, the applicant is willing to erect a fence around the frontage.
- 1.7 The facility would be supported by a free shuttle / mini-bus service (9-seater) offered by the applicants, Turning Tides, which is initially envisaged to operate 7 days a week from 12:00 – 20:00 hours, in order for residents to access services or amenities within Horsham. It is intended that this operate on a regular time-table by way of a dedicated driving team. A more ad-hoc service is envisaged to operate alongside the regular shuttle service, accessing other locations or times of travel.
- 1.8 A Management Plan has been submitted which sets out a series of procedures and policies that would apply in the overall management and organisation of the facility, along with details of the proposed shuttle / mini-bus service, staffing throughout a 24-period, and house rules to which the residents will be expected to adhere, along with procedures which are implemented in the event of a breach of tenancy or house-rules by a resident.

DESCRIPTION OF THE SITE

- 1.9 The application site lies on the southern side of Old Crawley Road, which runs parallel to the A264 / Crawley Road, and lies within the High Weald AONB. It is a sizable complex of buildings and land, including a grade II listed building, Roffey Place, which dates from the 18th Century, and which has an enclosed walled garden to its rear. Attached to the side of the listed building is a large two storey extension some 35m in width and 40m in depth which is the subject of this application, along with a detached gatehouse set to the site frontage with Old Crawley Road. The site has been in use as a Kingdom Faith Training Centre (theological college), with the complex providing live-in accommodation for students, since 1985. It is understood that the residential element of the college closed some 2 years ago as a result of the lockdowns during the Covid-19 pandemic, although the college maintained a presence on site up until some 6 months ago. Most of the previous site activity took place within the large side extension, which comprises ground floor halls, offices and kitchen/dining facilities, with the residential accommodation at first floor level above comprising some 45 bedrooms.
- 1.10 The Officer site visit to the premises revealed that a significant degree of damage and vandalism throughout the facility has occurred in the intervening period of vacancy, with copper piping ripped out of bathrooms and from within ceiling voids, sanitaryware smashed off the walls, broken panes of glass and other signs of wanton destruction.

- 1.11 The listed building has also been blocked off from the adjacent extension building, and has been boarded up to prevent access. This part of the wider site and the walled garden, are both excluded from the application site and proposed change of use, and would remain blocked off.
- 1.12 At first floor, the bedrooms, kitchenettes and bathrooms are laid out in the same manner as per the residential college. Similarly, the ground floor rooms provide for flexible meeting rooms, offices, a kitchen and dining room, along with a central former worshipping space with a lofty timber vaulted ceiling. The adjacent gatehouse appears as a standalone detached 'dwelling' with courtyard area and a wrap-around single-storey wing. As per the main block, this appears to be in good functional order, but in need of similar repairs.
- 1.13 Externally, the site benefits from three vehicular access points, with one from the west off Clovers Way and the main two access points leading to the application site off Old Crawley Road. The access points form an in and an out route through the site and via a large area of gravel and hard-standing used for parking, with additional hard-standing to the front of the listed building. There are various out-buildings, sheds, a cycle store and greenhouses within the grounds of the application site, which are large and open.

2. INTRODUCTION

STATUTORY BACKGROUND

- 2.1 The Town and Country Planning Act 1990.

RELEVANT PLANNING POLICIES

The following Policies are considered to be relevant to the assessment of this application:

National Planning Policy Framework

Horsham District Planning Framework (HDPF 2015)

- Policy 1 - Strategic Policy: Sustainable Development
- Policy 2 - Strategic Policy: Strategic Development
- Policy 3 - Strategic Policy: Development Hierarchy
- Policy 4 - Strategic Policy: Settlement Expansion
- Policy 16 - Strategic Policy: Meeting Local Housing Needs
- Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
- Policy 26 - Strategic Policy: Countryside Protection
- Policy 30 - Protected Landscapes
- Policy 31 - Green Infrastructure and Biodiversity
- Policy 32 - Strategic Policy: The Quality of New Development
- Policy 33 - Development Principles
- Policy 34 - Cultural and Heritage Assets
- Policy 35 - Strategic Policy: Climate Change
- Policy 36 - Strategic Policy: Appropriate Energy Use
- Policy 40 - Sustainable Transport
- Policy 41 - Parking
- Policy 42 - Strategic Policy: Inclusive Communities

Supplementary Planning Guidance:

- Planning Obligations and Affordable Housing SPD (2017)
- Community Infrastructure Levy (CIL) Charging Schedule (2017)

RELEVANT NEIGHBOURHOOD PLAN

Colgate has not been designated as a Neighbourhood Plan area

PLANNING HISTORY AND RELEVANT APPLICATIONS

DC/20/1065	Change of use from a Religious Institution with bedrooms (Class C2) to a Hotel (Class C1).	Withdrawn Application on 26.08.2021
DC/04/0731	Erection of single storey extension to provide extensions to library, lounge, lecture room and staff flat	Application Permitted on 17.06.2004
CG/23/90	Erection of extension for student accommodation	Application Permitted on 07.08.1990

3. OUTCOME OF CONSULTATIONS

- 3.1 Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk

INTERNAL CONSULTATIONS

3.2 **HDC Housing: Support**

Housing Officers would support the application as it will provide a better outcome for some of the most vulnerable households within our district. It will provide households better outcomes to enable applicants to have supported move on options which are more likely to result in long term housing solutions and independent living.

The service will provide a total of 50 units of accommodation. Roffey Place is proposed to be a short-term accommodation service, where the needs of each individual are assessed and supported. In due course individuals will be supported to transition from Roffey Place to suitable longer-term accommodation that also meets their needs at that time. The Roffey Place service will be for local homeless people who have suffered multiple and often prolonged disadvantages throughout their life.

To ensure the effectiveness of this service Turning Tides propose to provide 24 hour a day staffing including waking night cover and specialist support from highly trained support workers in areas including mental health, substance and alcohol addiction and tenancy management. In addition, there will be a large multi-agency hub space on the ground floor where the Council, Turning Tides and other staff could be co-located to see clients by appointment during working hours. The service will be managed by Turning Tides, a charity with over 30 years' experience of running successful homelessness services across West Sussex.

As of March 2022, Horsham District Council were providing temporary accommodation to 34 single households and emergency accommodation to a further 31 single households, compared to April 2021 when 3 people were accommodated in emergency accommodation. This is a 933% increase.

Turning Tides has explained that they will adopt a multi-agency approach providing comprehensive support to some of the most vulnerable clients in our communities to ensure their needs are met and they are able to achieve a brighter future. Residents will live in a safe, secure, and supported environment that balances independence with sufficient support to enable people to rebuild their lives. The service will support residents to contribute through work or education, empowering them to develop confidence in themselves and harness their ambition. Support provided intends to develop the resident's ability to regain independence and to transition to lower support accommodation.

3.3 **HDC Heritage and Conservation: Comment**

The temporary proposed use will reduce the risk to the heritage asset as there would be greater incidental and managed surveillance. With the building being unoccupied there is an increased risk of vandalism and arson. A temporary security fence would be beneficial but it is not essential if the listed building is regularly monitored by staff. Although details up front of the fence would be preferred, it is acceptable to secure the details by way of condition, as it would be a temporary structure.

OUTSIDE AGENCIES

3.4 **West Sussex County Council Highways:** No Objection

Details have been provided of the previous use as a bible college, and the proposed use as a homeless shelter, which reveals a less intensive proposed use.

It is likely that the peak hours of the proposed homeless shelter would be at the beginning, middle and end of the day which are outside of the normal am/pm peak hours, which would have a positive impact on highway capacity

The location of the site is considered to be unsustainable with no public transport or footways, but the applicant has now shown that the proposal can operate less intensively than under its lawful planning use.

Furthermore, the applicants have provided a site shuttle bus to mitigate where possible the reliance on the private car and to ensure residents have access to transport to get them to appointments, and for social activities. WSCC acknowledge the provision of the bus will go some way in helping to mitigate the unsustainable location whilst keeping the occupancy car trips to a minimum.

Should some residents need to bring a car to the site, car parking space is available; so this would not cause any overspill parking onto the public highway.

Access into the site will also be improved and the direction of travel controlled with private signage to mark and 'in' and 'out' for people visiting the site.

In response to the fatality along Old Crawley Road, the available data reveals this was a cyclist who collided with a vehicle, some 380m west of the site's access, which was down to 'reckless / careless behaviour' on the part of the vehicle driver. The LHA does not consider that the proposal would create any additional risk as the incident was not down to any highway defect and was not associated with the site access.

3.5 **Southern Water:** Comment

No public foul and surface water sewers in the area to serve the development – alternative means of foul and surface water disposal necessary

3.6 **Sussex Police:** Comment

[Summarised]:

From a crime prevention perspective, Sussex Police are pleased to note point 6.0 of the accompanying planning & heritage statement and Roffey Place statement of purpose supporting comments relating to safety and security and how residents will be supported.

The following measures are advised to reduce opportunity for crime and the fear of crime (using Secured by Design and Crime Prevention Through Environmental Design principles:

- Controlled entry door for authorised persons only (trades access or timed-release mechanisms are not advised to communal developments)
- Fire-rated bedroom doors off the central corridor, with suitable hinges and locks, and viewers

- All windows and doors checked to ensure they are fit-for-purpose and provided with appropriate locking mechanisms, new doors and windows to conform to specified minimum standards
- Postal arrangements via secure wall, lobby or external mounted secure post boxes (rather than in-door apertures)

Concerns have been raised by the local neighbourhood policing team that the premises may potentially place an additional burden upon policing resources, so regular reminders are advised to all users of the service of their license agreements as outlined in the accompanying statement of purpose.

The neighbourhood policing team have also expressed concerns that the location is not serviced by pavement to local roads and is very close to the A264 - nor is it serviced by public transport. This means that service users leaving on foot will be walking in the carriageway of a single lane road which creates a considerable safety risk.

3.7 **Natural England:** No Objection – subject to mitigation being secured

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Our advice is as follows:

From the evidence provided in the Water Neutrality Statement dated 24 June 2022, in conjunction with the revised water neutrality calculations (dated 04/08/2022) and the revised Part G calculator (dated 04/08/2022) the applicant is proposing mitigation measures through the use of water efficient fixtures and fittings in the proposed building.

Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given as above. You, as the competent authority, should ensure conditions are sufficiently robust to ensure that the mitigation measures can be fully implemented and are enforceable in perpetuity and therefore provide a sufficient degree of certainty to pass the Habitats Regulations.

3.8 **Colgate Parish Council:** Comment

- When the parish meeting was open to members of the public they spoke strongly against DC/22/0939
- Concern that residents in nearby Roffey Park had not been notified of the proposal and that there was concern over substance abuse and the security of their own properties
- Isolated location for residents, lack of public transport and no footpath to walk safely along Old Crawley Road towards Horsham
- Confirm that Listed Building Consent is not required
- If permission is to be granted then development description should accurately reflect the use, rather than referring to 'sui generis', which could mean anything

PUBLIC CONSULTATIONS

3.9 To date 28 letters of representation from separate addresses have been received all of which express objections to the proposal, on the following grounds:

- Inappropriate location – close to nature walks, network of PROW through and past residential properties, and well-used woodland, tea-rooms and a pick-your-own farm, young children (Little Owls Nursery) – not suitable for intended re-integration into the community owing to distance from nearby amenities / job opportunities
- Existing residents will no longer be able to enjoy their rural location
- Welfare concern to nearby residents – stress and anxiety caused
- Potential for residents to be evicted from the site and camp out in the nearby woodlands
- Necessary to install 24/7 security
- Screening of residents necessary to ensure no adverse activities – potential mental health and substance abuse issues, as residents will be free to leave the site
- Complex health needs of residents would impact on local GPs and existing patients within nearby practices
- Instances of theft, criminal activity and burglary in the area – what are proposed mitigative crime measures?
- Location along road with no pavement, no shops or other nearby amenities, walking along road is dangerous – recent fatality along road
- No access to public transport, proposed ‘half-board’ will require residents to travel to access food and groceries
- Resulting boredom arising from rural location with no access to facilities and no available transport (50 single men in residence)
- Concern with acknowledgement in Planning Statement of possibility of anti-social behaviour
- Concern that the Police have expressed concerns and need for extensive security measures on-site
- Proposed ‘sui generis’ description and lack of publicity is clearly an indication to have the application approved under the radar – potential for other ‘sui generis’ uses to be implemented at the site without need for further planning permissions
- Other uses such as a hotel would be much better

Officers confirm that a site notice has been posted at the site dated 28th June as required by way of statutory notification procedure, along with neighbour letters to properties directly adjoining the site, as per the standard notification procedure. In addition, a newspaper advert has been placed in the local press.

4. HOW THE PROPOSED COURSE OF ACTION WILL PROMOTE HUMAN RIGHTS

- 4.1 Article 8 (Right to respect of a Private and Family Life) and Article 1 of the First Protocol (Protection of Property) of the Human Rights Act 1998 are relevant to this application, Consideration of Human rights forms part of the planning assessment below.

5. HOW THE PROPOSAL WILL HELP TO REDUCE CRIME AND DISORDER

- 5.1 It is not considered that the development would be likely to have any significant impact on crime and disorder.

6. PLANNING ASSESSMENTS

Principle of Development:

- 6.1 In terms of local planning policies, HDPF policy 42 includes a provision to help create a socially inclusive and adaptable environment for a range of occupiers and users to meet their long-term needs. Lack of reference to short-term needs would not preclude this policy from being considered as one of the main policies against which this proposal would be considered.

The pre-amble of HDPF Policy 42 states:

"It is important that development should contribute towards meeting the needs of all sections of the community and help to encourage social cohesion. We will therefore seek to ensure that opportunities are taken to address identified needs and that the services which promote and support health and well-being are accessible and effective, having regard to the circumstances of the people for whom they are provided."

- 6.2 The proposal seeks to provide temporary accommodation for a range of homeless people of various ages, ethnicities and backgrounds, both male and female, many of whom are currently homeless within the district and many have family links to the area. The provision of 50 rooms within the site would provide a transitional arrangement for prospective residents. It is noted that the district has experienced a 933% rise in single households / people needing emergency accommodation, which underpins the need for such as facility as being proposed.
- 6.3 It is noted that the proposal does not necessitate any new 'development' but instead seeks to use an existing built facility which is already provided with facilities and a floorplan that can easily be adapted to the needs of the applicants. Although located outside of a defined BUAB, the existing facility is already provided by vehicular access, parking space and outdoor recreational space for prospective residents. As such, the proposed conversion of what was previously a residential educational facility to a homeless shelter (Sui Generis use) would not conflict with the policy presumption which seeks to direct new development to sites within the defined BUAB.
- 6.4 The facility has previously been operational as a residential college for some 35 years, with acknowledged vehicular traffic movements, accommodating live-in students within the site. The proposed use is therefore considered to be commensurate with the previous use of the site, in that there had been a residential presence across the site throughout the week. One main difference would be that the current use would continue throughout the year, with occupancy levels fluctuating according to need and demand, rather than being limited to term-times. However, the extended occupancy of the site throughout the whole year is not considered to raise any policy-derived issues.
- 6.5 Accordingly, the proposal is considered to be compliant with local planning policies, particularly HDPF policies 2, 16 and 42. Furthermore, the proposal accords with the NPPF (para 60), which requires that the '*needs of groups with specific housing requirements are addressed*', and para 93(b), to '*take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community*'. Accordingly, this proposal would provide support for homeless people within the district to access on-site support, residential care and accommodation, with a view of achieving independent living and moving on into long-term housing.

Design, Appearance and Layout:

- 6.6 The existing shell and layout of the building already facilitates the on-site accommodation of residential students associated to the former college use of the building. At first-floor, the existing layout provides for some 34 bedrooms and clusters of male / female WCs and bathrooms. The functional layout is to be largely retained within the building with all

bedrooms to be strictly occupied on a single person basis, with clusters of rooms allowing for the allocation of rooms and residents according to needs and situation, e.g. creating a quieter 'wing', or where comparable aged residents are housed. There are some ground floor rooms enabling occupants to be housed with their pets. Ultimately, the accommodation has to be flexible and responsive to the needs of occupants of the site at any time.

- 6.7 It is noted that almost all cooking, bathing, WC facilities within the building will need to be replaced, largely on account of a significant degree of vandalism incurred within the premises since being vacant. These new fittings would enable water-efficiency measures to be achieved within the facility. Although it is intended that facilities are communal, such as cooking and dining, there would be some limited facilities within the bedroom 'wings', enabling residents basic food preparation and tea-making facilities.
- 6.8 At ground floor, the layout lends itself to a series of office spaces, communal cooking / dining, and multi-functional rooms that can serve as needed for advice, training, activity areas, IT hubs, resident lounges and staff areas where supporting services can be accessed. These existing spaces will be upgraded to serve as flexible support spaces for the facility and residents.
- 6.9 Despite the vandalism of the building, limited repair works are necessary to upgrade the existing fabric of the building, and so the proposed changes will be largely limited to the interior of the building.
- 6.10 The proposal therefore complies entirely with the aims of HDPF policies 32 and 33, and will retain the scale, character and appearance of the existing development.

Trees, Landscaping and Impact on AONB:

- 6.11 The overall Roffey Place site comprises some 2.5ha of land, excluding some 200sq.m of the site comprising the listed building and its walled garden. The former college grounds includes area of hard-standings to the frontage, trees and hedgerows which provide screening of the site from the public highway along with a sizable parking area with three vehicular access points. To the rear, the grounds are predominantly open grasslands with clusters of trees, giving way to the sweeping agricultural landscape beyond the site's boundaries.
- 6.12 As the site lies in the High Weald AONB, consideration of the proposal must be given in accordance with NPPF paras 176 and 177, and policy 30 of the HDPF (2015). It is noted that the proposal does not entail any further development, but proposes a change of use of the existing buildings which have been on site for some 30+ years. In this regard, the proposal is not considered to be major development within AONB. Given there would be no increase in development at the site, the landscape and scenic beauty of the AONB will not be impacted by the proposal beyond the existing and established development on site.
- 6.13 There are no indications that the external area and wider grounds would be subject to any changes other than ongoing regular maintenance and upkeep works. The proposal is not considered to lead to any impact, significant or otherwise, on the setting, character or landscape value of the designated landscape, and would maintain the distinctiveness and sense of place and setting of the High Weald AONB. The proposals would not therefore conflict with policies 25, 30 and 31 of the HDPF, or paragraphs 176 and 177 of the NPPF which affords great weight to conserving and enhancing the landscape and scenic beauty of the AONB.

Heritage Impacts:

- 6.14 The proposal would not affect the setting of the attached Grade II listed building of Roffey Place, which is excluded from the lease available to the applicants, and therefore set outside of the application site area.

- 6.15 As the adjacent heritage asset is to remain vacant, and outside of the application site, it may become necessary to secure this asset by means of a fence around its frontage, given the level of vandalism that has been experienced at the application site during its short period of vacancy. If the level of vandalism that already appears present in the locality affects the adjacent listed building, and protective fencing becomes necessary, then a planning condition is suggested to secure details to ensure they are appropriate to the setting and protection of the heritage asset.
- 6.16 At the rear, the heritage asset is already protected by a walled garden, defining the excluded area of the current application site.
- 6.17 The potential need to erect a protective fence would affect the setting of a listed building, but this is a short-term, and ultimately reversible structure, which seeks to prevent further harm to and damage to the fabric of the listed building itself. Subject to submission of details in the event that this fencing becomes a necessary addition to the frontage, then it is considered that the proposal would accord with the provisions of HDPF policy 34, and paras 197 and 199 the NPPF (2021).

Amenity Impacts:

- 6.18 The host building lies some 140m off the northern neighbouring properties at Clovers and Rose Cottages, some 240m off the western neighbours at New House Farm Business Centre (which includes some 9 dwellings), some 150m off the recently completed Little Barn Owls nursery to the south and a small group of nearby residential properties, and some 600m north west of dwellings within Roffey Park.
- 6.19 There is sufficient distance between residential properties so as to not lead to any direct issues regarding loss of light, outlook or privacy.
- 6.20 However, the comments raised are more related to the uncertainties associated with the nature of the proposed facility, namely re-integrating homeless people back into society by providing a short-term accommodation (6-9months), and by enabling the residents to seek health, financial, educational, vocational and community support and training.
- 6.21 The NPPF at para 92(b) sets out that planning decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, to that crime and disorder, fear of crime, do not undermine the quality of life or community cohesion, and at 92(d), to enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.
- 6.22 Therefore, whilst there is support in national policy for the proposed facility, there is also a need to ensure there is a robust and workable management plan in place so that the operational running of the facility does not adversely lead to harm to neighbouring amenities. The submitted Planning Statement sets out that the following measures will be implemented as part of the overall management of the site:
- 24-hour 'double-cover' staffing including waking night cover ('double-cover' means at least 2 staff on site at all times)
 - Additional out-of-hours support available, including an on-call manager service (provided by Turning Tides)
 - Highly trained support staff to provide specialist support
 - Residents to sign a license agreement as part of their accommodation at the site, setting out rules and expectations to be adhered to, and warnings in the event of license breaches or anti-social behaviour. Provision for licenses to be ended
 - CCTV system at each entrance / exist, all communal areas, landings and to the exterior of the building, including the adjacent listed building
 - Monitored alarm system

A Management Plan (MP), along with all the relevant operational policies and procedures in which are to be implemented and put in place at the shelter, has been received. This MP also includes a code of conduct and house rules to which tenants will be expected to adhere throughout their occupancy, and sets out the implications in the event of a breach of the rules. It is considered that these details present a robust and comprehensive set of policies and procedures which will be in place at the site. Officers are therefore satisfied that these details can be secured by condition, and that the proposal will not result in harm to amenity that would conflict with Policy 33 of the HPDF.

Access and Highways Impacts:

- 6.23 The site is currently served by three functional vehicular access points, two off Old Crawley Road, and a gated access off Clovers Way. The two access points off Old Crawley Road directly serve the proposed facility and are already set up to function as an in and an out access, with hard-standing areas forming parking areas to accommodate some 50 parking spaces. The site previously had lawful use as a residential college with staff and 45 bedrooms, with the associated daily vehicular movements. Whilst the proposal presents an increase in five bedrooms across the site, given the nature of the proposed use there would inevitably be a low car ownership amongst residents. Even estimating this at 10%, this would only amount to some 5 spaces / cars.
- 6.24 The location of the site is some 800m northeast of the built up area boundary of Horsham. It is understood that some residents might have cars and would therefore be able to easily access local amenities, but for those residents without cars, there would be organised regular mini-bus services provided throughout the week. The supporting statement identifies that parking demand and trip generation would comprise a maximum of 20 onsite staff at any time, 5-10 daily visitors for residents, and potentially 10% of residents who own a car. This quantum of parking can be comfortably accommodated on the site, whilst the trip generation would be similar, and arguably less, than that of the previous use of the site as a residential training centre with some 45 bedrooms for overnight stays. Having considered the nature of the previous and proposed uses, it is not considered that the proposal will result in a severe cumulative impact on the operation of the highway such as to conflict with paragraph 111 of the NPPF.
- 6.25 Comments received from neighbouring occupiers raise concerns about the danger of pedestrians / cyclists using Old Crawley Road, citing a recent fatality to a cyclist. Old Crawley Road does not benefit from a footway along its full extent therefore the site is not well located for occupiers to walk to local services. Whilst there is a local bus network available connecting the site with both Horsham and Crawley, with the Metrobus 23 running along the A264 / Crawley Road operating on a half-hourly basis Monday-Saturday, and less frequently on Sundays, the nearest bus stops are approximately 800m northeast and about 1km to the southwest of the site. In recognition of the absence of a footway along Old Crawley Road, and the distance to local services, the applicants propose to operate a mini-bus service that is to operate 7 days a week regularly from 12:00 – 20:00 hours and also on a more ad hoc basis depending on need. This will enable residents to access services which may not be available 'in-house'. A condition is attached requiring further information of this service and to ensure that it operates at all times during the course of this temporary use.
- 6.26 The site has established vehicular access points off the public highway network, with these to be dedicated as 'in' and 'out' accesses. Furthermore, the site is provided by sufficient off-street parking capacity to service its needs. Details of how the mini-bus service (and the more ad-hoc service) would operate, have been clarified by the applicant, and are secure by condition. Therefore, despite the location of the site, the wider proposal incorporates appropriate and considered mitigation which would facilitate access to local services for residents. These details can be secured by condition to ensure this service is retained, and to ensure that the service is capable of being adapted in order to accommodate any changing needs and demands of the facility and residents. Overall, having regard the specific needs

of the occupiers and the provision of the shuttle bus service, it is considered that the proposal satisfies the criteria of HDPF policies 40 and 41 in this instance.

Water Neutrality:

- 6.27 The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.
- 6.28 Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.
- 6.29 The proposed change of use of the facility would consume water therefore the applications needs to evidence that the proposed use would not lead to increased consumption over and above the previous use as a residential educational college, in order to demonstrate the required water neutrality.
- 6.30 Submitted metered water bills of the property demonstrate a fluctuating water use over the period of 2015 until the property was vacated at the beginning of 2022. Having extrapolated averages across the period from April 2015 through to Oct 2021, the daily use amounts to some 5,002 litres per day (lpd). The proposal would involve the replacement of sanitaryware fittings with new low-volume and water efficient fittings, and replacing baths with new showers. Although the applicants envisage that a 90% occupancy rate is likely to be realistic, officers have applied a higher precautionary 100% occupancy rate, which would still achieve a reduced water consumption of 4,816 lpd. Therefore, the evidence supports that the proposed occupation of the facility would achieve a water neutral development. In accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, an appropriate assessment has been completed in consultation with Natural England, who have not raised objection to the mitigation strategy.
- 6.31 Therefore, subject to conditions to secure the efficient fixtures and fittings within the refurbished building, there is no clear or compelling evidence to suggest that the proposal would result in an adverse impact on the Arun Valley SAC, SPA and Ramsar sites, either alone or in combination with other plans and projects. The grant of planning permission would not therefore adversely affect the integrity of these sites or otherwise conflict with policy 31 of the HDPF, NPPF paragraph 180, or the Council's obligations under the Conservation of Habitats and Species Regulations 2017.

Other Matters:

- 6.32 The applicants have requested that the proposal be granted permission for a temporary period of 5 years only. Given the particular use being proposed, the need for which may change over time, and given the concerns raised by interested parties over the potential for anti-social behaviour by some residents, it is considered that a temporary consent is appropriate in this instance to allow for review of the longer term need for the accommodation and how the site operates.

Conclusion / Planning Balance:

- 6.33 The proposal seeks a temporary use of the building and lands within the identified red line area, excluding the adjacent listed building and its walled garden, for a period of 5 years for the provision of residential accommodation and associated holistic services specifically for homeless people. This use is considered to accord with HDPF policies 2, 16 and 42 which

seeks to ensure adequate housing exists for a full range of occupiers within the district, reflecting particular needs.

- 6.34 The proposal would provide for the re-use of a currently vacant and vandalised building to provide the much needed homeless accommodation. The site benefits from established vehicular access and considerable parking provision within the site. Although located outside of the settlement boundary of Horsham, the existing lawful use of the site as a residential college provides for a more intensive impact on the public highway in terms of vehicular traffic movements than the proposals. Although there is a bus route close by, the lack of pavements around the site and the distance from local services leads to the site being considered to be 'unsustainable' in its location in terms of residential accommodation. However, owing to the very specific needs of the homeless shelter, and the organisation, experience and capacity of the operator, a mini-bus is to operate for residents to access services, amenities, employment opportunities and social networks. This will provide residents with the opportunity to safely access local services without the need to walk on roads currently without footways. Subject to the provision of this shuttle bus service, the specific nature of this proposal is considered in this case to meet the requirements of HDPF policies 40 and 41, with the effective re-use of previously developed land being encouraged as part of HDPF policy 2.
- 6.35 Consideration in relation to the siting of the application site within the High Weald AONB has concluded that no adverse impact would occur to the special qualities or landscape setting of the designated landscape as required by paragraphs 76 and 177 of the NPPF and HDPF policies 25, 30 and 31.
- 6.36 Furthermore, following the required upgrading and internal re-fitting works necessary throughout the building, there would be beneficial savings in terms of the resulting water use, as per the requirements of HDPF policy 35 and the water neutrality issues in relation to HDPF policy 31, such that there would be no adverse impact on the integrity of the Arun Valley SAC/SPA and Ramsar sites.
- 6.37 The applicants have considerable experience in delivering a wide range of residential accommodation for people looking to find a long-term solution to their homeless situation across West Sussex. This is a rural location which is intended to provide accommodation stays of between 6-9 month with sufficient space available in the building to provide 'in-house' access to supporting and holistic services for residents. Although the application is accompanied by details on the proposed management to support the delivery of the facility, such as CCTV coverage, 24 hour trained staffing and accommodation licenses to be signed by residents, a planning condition is advised to secure these and further details and to accord to HDPF policy 33.
- 6.38 The proposal is therefore considered to be in accordance with the development plan and is recommended for approval subject to the conditions below.

7. RECOMMENDATIONS:

- 7.1 To approve planning permission subject to the following conditions:

Conditions:

- 1 **Approved Plans**
- 2 **Standard Time Condition:** The development hereby permitted shall begin before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

- 3 **Temporary Permissions:** The use hereby permitted shall provide for the accommodation of homeless people only, operated by Turning Tides, and shall be for a limited period of 5 years from the date of this permission. Thereafter the use shall be discontinued.

Reason: To allow for review of the need for the proposed accommodation and its impacts on the amenities of the area, accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 4 **Regulatory Condition:** The occupation and operation of the shelter hereby approved shall be in full compliance with the Management Plan (received 15.09.2022) has been submitted to and approved in writing by the Local Planning Authority. The Management Plan shall be implemented and complied with for the duration of the use/development.

Reason: In order to ensure that the safe operation of the development and to protection of the amenities of nearby residents, in accordance with Polices 33 of the Horsham District Planning Framework (2015).

- 5 **Pre-Occupation Condition:** The development hereby permitted shall be undertaken in full accordance with the water neutrality strategy (received 24.06.2022). The use hereby permitted shall not be occupied until evidence has been submitted to and been approved in writing by the Local Planning Authority that the approved water neutrality strategy for the proposed use has been implemented in full. The evidence shall include the specification of fittings and appliances used, evidence of their installation, and completion of the Part G water calculator or equivalent. The installed measures shall be retained as such thereafter.

Reason: To ensure the development is water neutral to avoid an adverse impact on the Arun Valley SACSPA and Ramsar sites in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

- 6 **Pre-Occupation Condition:** No part of the development hereby permitted shall be occupied until details for the provision for the storage of refuse and recycling facilities have been submitted to and approved in writing by the Local Planning Authority. These facilities shall be provided prior to first occupation (or use) of the development hereby permitted and thereafter be retained for use at all times.

Reason: To ensure the adequate provision of recycling facilities in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 7 **Post-Occupation Condition:** In the event that additional means of protective and security fencing is required to the listed building, no fence or means of enclosure shall be erected until details have been submitted to and approved in writing by the Local Planning Authority. The fence or means of enclosure shall be implemented as approved, and shall thereafter be maintained in accordance with the approved details.

Reason: In the interests of visual and residential amenity in accordance with Policies 33 and 34 of the Horsham District Planning Framework (2015).