

BOKLOK

LAND TO THE SOUTH OF LITTLEHAMPTON ACADEMY

Planning Statement

March 2021



SKANSKA



RGP

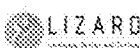
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Planning Statement

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Planning Statement

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1. Introduction

- 1.1. This statement has been prepared on behalf of BoKlok Housing Ltd in support of a planning application on Land to the South of Littlehampton Academy (hereafter referred to as 'the site') to deliver 112 dwellings with associated car parking and public open space accessed from Fitzalan Road.
- 1.2. The site falls in the Local Planning Authority (LPA) area of Arun District Council (ADC) who are the determining authority.
- 1.3. The description of development is as follows:

"Erection of 112 residential units with access from Fitzalan Road, open space, hard and soft landscaping works, internal roads/footways, car and cycle parking, substation, bin store and associated engineering and infrastructure works."
- 1.4. This statement describes the site and sets out the details of the proposed development and how it addresses relevant national and local planning policy and guidance. The full planning application for the proposed development comprises a suite of documents to support the proposal, including a Design and Access Statement and a full drawings pack. A detailed list of all plans and supporting technical documents submitted for consideration is provided within the submitted covering letter.

2. The Site

- 2.1. The site is approximately 2.4 hectares (ha) of previously developed land, located within the built up area of Littlehampton. It is located immediately to the south of Littlehampton Academy and to the east of Fitzalan Road. A children's day nursery and residential dwellings are located to the east of the site. A footpath and cycleway (Public Right of Way 3104) extend along the site's southern boundary with Rosemead Park, a public park and play area, immediately beyond to the south.
- 2.2. The site was previously occupied by the buildings and facilities of Littlehampton Community School, which has since been demolished. The site is generally level with no features of landscape or townscape significance.
- 2.3. The site is located within the Littlehampton Built Up Area Boundary, is allocated in the Littlehampton Neighbourhood Plan as a housing site and is identified as previously development land on Arun District Council's Brownfield Register. The site has been unmanaged since the demolition of the school resulting in parts of it becoming overgrown with scrub and spoil heaps left on site. The spoil heaps are to be removed and the site cleared following the issue of planning consent for redevelopment.

Figure 1: Site Location Plan



Relevant Planning History

- 2.4. Following the disposal of the site by West Sussex Council for education use, an outline application for the development of 68 dwellings was submitted to ADC for consideration (LU/55/15/OUT). The outline application sought for all matters to be reserved with the exception of access. The application was originally refused for one reason:

"The proposal fails to deliver adequate infrastructure associated with the scale of the development. The viability appraisals submitted to justify a lower than policy compliant position do not satisfactorily reflect reasonable values and costs and the proposals are therefore contrary to policies DEV17 and GEN8 of the Arun District Local Plan, policy 4 of the Littlehampton Neighbourhood Plan and guidance contained within the NPPG."

- 2.5. The Applicant appealed the Council's decision. The Inspector's decision sets out that the Council did not 'contest' the appeal, as the appellant was willing to offer financial contributions towards infrastructure and affordable housing through the provision of a legal agreement. A Section 106 Agreement was signed on 18 August 2016. The allowed consent was never implemented but, importantly, established the principle of residential development on this site.

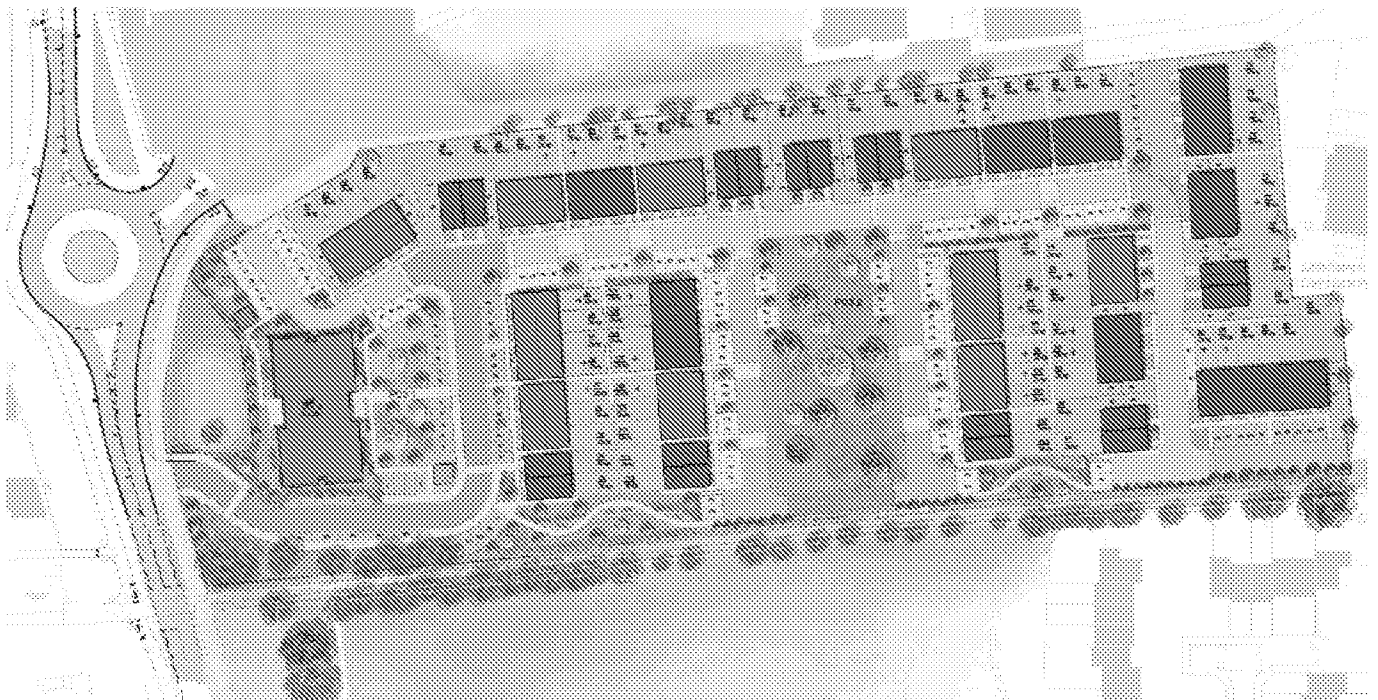
3. Pre-Application Engagement

- 3.1. Prior to the application submission, the applicant has engaged with all relevant stakeholders to present plans and seek feedback to inform the planning submission.

Pre-Application Advice

- 3.2. A request for pre-application advice was made to Arun District Council in July 2020. This presented a scheme for 112 dwellings supported by a pre-application Planning Statement and a Transport Note (RGP, July 2020).

Figure 2: Pre-Application Site Plan



- 3.3. Feedback was given via writing and in a meeting held in September 2020. This feedback enabled modifications to the masterplan that is presented as part of this planning application. These comprise:

- Housing: Providing a compliant affordable mix
- Residential amenity: Separation distances to comply with the SPD
- Residential amenity: Garden depth to be 10.5m deep minimum
- National internal space standards: Dwellings to comply or exceed the standards
- Single aspect flats: Design will allow for a well-lit, ventilated flats with good outlook
- Balcony sizes: To meet standards
- Site layout: Parking layout to be broken up
- Landscape: Providing additional trees on site
- Parking: Parking provision to agreed standards

- Parking: Provision of EV charging and Car Club

Community Engagement

- 3.4. Following pre-application engagement with Arun District Council and subsequent modifications to the masterplan, pre-application consultation with local stakeholders was undertaken in January and February 2021. The application is supported by a Statement of Community Involvement (SCI) prepared by BECG, which sets out the full details of the consultation exercise and feedback received.
- 3.5. As a result of COVID-19 affecting the ability to undertake a traditional exhibition, alternative methods of ensuring a robust consultation exercise were effected. A virtual consultation exercise was undertaken with approximately 700 local stakeholders being informed by newsletter, resulting in 35 online feedback forms, one posted feedback form and one telephone call. Comments on the masterplan were supportive, agreeing that the plans represent a good use of the site. Constructive feedback was received that raised reservations that the proposals could add to existing pressures on local infrastructure, especially relating to places at health care practices such as GP surgeries and dentists. Other concerns were also raised regarding the level of parking provision and whether it would be sufficient, the loss of trees and wildlife, as well as pollution during construction and the emergency access onto Elmgrove Road and whether this would impact existing parking issues. All comments raised have been considered and addresses within the planning submission, where possible.
- 3.6. In addition, one-to-one video meetings were undertaken with Littlehampton Day Nursery, Littlehampton Academy, Littlehampton Society and Littlehampton Town Council to present the proposals and discuss possible issues arising. Paragraph 3.3.9 of the SCI details the main issues and topics arriving from the discussions at the one-to-one meetings. The topics broadly focused on local infrastructure provision, timescales for construction, sustainability, interest in the modular homes model and the provision of affordable housing. The overall message was of support for the redevelopment of this brownfield site.

4. The Proposal

- 4.1. This planning application seeks full planning permission for residential development of the site comprising 112 dwellings with associated access of Fitzalan Road, internal roads, parking, a substation, refuse storage, cycle storage and landscaping.
- 4.2. The proposed development has been designed to respond to and to connect to Rosemead Park to the south of the site and has been informed by the pre-application advice received from Arun District Council and a comprehensive assessment of the opportunities and constraints of the site and the surrounding area. The most significant constraint is the easement of the sewers that run along the south boundary of the site, which precludes siting dwellings in this area, as indicated by the red hatched area in the figure below.

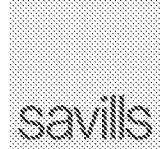
Figure 3: Proposed Site Plan



- 4.3. The proposed layout comprises a mixture of dwelling types and tenure delivered through a flat block of 32 dwellings and 80 houses arranged around two main areas of public open space. The supporting Design & Access Statement and drawings that support the application set out a full schedule of accommodation including the proposed affordable housing layout.
- 4.4. Vehicular access to the site would be provided from Fitzalan Road in the same position as the scheme allowed at appeal in 2016. Internal roads would provide direct access to each dwelling with turning areas incorporated to ensure safe manoeuvrability for all vehicles. It is not proposed to provide vehicular access from Elmgrove Road, except for emergency access, if required. 178 car parking spaces would be provided comprising parking on private drives, allocated parking, visitor parking and car club parking.

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- 4.5. Pedestrian and cycle access to the site would be provided from Fitzalan Road, Elmgrove Road and the footpath/cycleway to the south of the site. Each dwelling would have secure bicycle storage.
- 4.6. Landscaping and green infrastructure has informed and been integrated within the layout of the site; the proposed development would be arranged around two areas of multi-functional public open space. The largest of these in the centre of the site would provide a visual and physical link to Rosemead Park. BoKlok Housing Ltd aspires to create a green heart at the core of each residential development. The central green space provides this space amongst the proposed homes, creating a community hub for residents as well as opportunities for habitat creation.
- 4.7. The proposed development would retain the most significant trees on the site that are found on the south west corner adjacent to Fitzalan Road and the footpath/cycleway that separates the site from Rosemead Park.
- 4.8. The design of the proposed residential dwellings has been driven by BoKlok's approach to development which uses Modern Methods of Construction (MMC) to provide modular housing. As with all BoKlok developments, the homes will be made from timber frames and will feature key BoKlok characteristics such as natural light, low energy consumption and IKEA fittings. The majority of construction will take place off site, allowing efficient and fast delivery of homes. This approach to the delivery of homes not only creates a modern and functional neighbourhood, but helps keeps prices at an affordable level for future purchasers.
- 4.9. MMC allows for a smart, controlled and industrialised environment for constructing homes which enables high quality, minimum waste and a much lower carbon footprint compared to traditional construction. MMC also reduces the overall cost of delivering new homes, which means that homes for private sale can be more affordable to local residents. BoKlok provides private sale homes on a '*Left-To-Live*' model, which takes into account what customers can pay for a home after all their other living expenses are paid for.
- 4.10. The accompanying Design and Access Statements provides a detailed explanation of the BoKlok design approach and the key design features of the proposed development.

5. Planning Policy

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.
- 5.2. Within Arun, the Development Plan consists of:
- Arun Local Plan 2011 to 2031 (adopted 18 July 2018)
 - Littlehampton Neighbourhood Plan (adopted 5 November 2014)
 - The West Sussex Waste Local Plan 2014
 - The Joint Minerals Local Plan 2018
- 5.3. Supplementary Planning Guidance is a material consideration. The following documents are relevant:
- Arun District Design Guide January 2021
 - Arun District Council Public Open Space, Playing Pitches and Built Facilities January 2020 SPD
 - Arun District Council Parking Standards January 2020 SPD
- 5.4. The National Planning Policy Framework (February 2019) (NPPF) is also a material planning consideration.

6. Planning Policy Assessment

The Principle of Development

- 6.1. Policy SD SP2 states that *“Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.”* The site is located within the Built Up Area Boundary of Littlehampton and is also allocated for the development of new homes under Policy 4 of the Littlehampton Neighbourhood Plan. As a result, it is considered that the proposed development is in accordance with the principle of development of the Development Plan.
- 6.2. Although Policy 4 allocates the site for approximately 70 dwellings, the application details that additional dwellings can be accommodated in accordance with the policies of the Development Plan. Justification for the provision of 112 dwellings on the site, in accordance with the development plan, is set out in detail below.

Housing Need

- 6.3. The Arun Authority Monitoring Report published December 2020, identifies that Arun District Council cannot demonstrate a 5 Year Housing Land Supply, with calculations showing a supply of 3.3 years. Additionally, the 2020 Housing Delivery Test results published in January 2021 show Arun as having under-delivered against its housing requirement for each of the last four years and failing the Housing Delivery Test in 2019 and 2020.

Table 1: Arun Housing Delivery Test Results

Year	Number of homes required	Number of homes delivered	Housing Delivery Test measurement		
2015-16	610	902	91%	68%	61%
2016-17	866	618			
2017-18	947	704			
2018-19	1,120	660			
2019-20	1,025	515			

- 6.4. As a result, the NPPF's presumption in favour of sustainable development applies. The increased density of the proposed development over the allocation in a sustainable location within the Littlehampton Neighbourhood Plan would assist with housing delivery in Arun and would make a worthwhile contribution to the identified housing need over the next five year period. It is considered that this should be given significant weight in the planning balance.

Housing Mix and Affordable Housing Provision

- 6.5. Policy H DM1 states that *“The Council will seek a mix of dwelling types and sizes... For developments of 11 units or more the Council shall require a balanced mix of market and affordable dwelling sizes including*

family sized accommodation based on the most up to date SHMA recommendations."

- 6.6. The most up to date SHMA recommendations are found within the Updated Housing Needs Evidence for Arun District Council¹. Table 29 of this document shows the suggested broad mix of housing by size and tenure in Arun:

Table 2: Reproduction of Table 29 (Updated Housing Needs Evidence for Arun District Council)

	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
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%

- 6.7. Policy AH SP2 states that *"For all developments of 11 residential units or more the Council will require a minimum 30% of the total number of units proposed on site to be provided as affordable housing... The Council will negotiate the affordable housing tenure mix on development sites from an initial position of 75% rent and 25% intermediate housing."* The proposed housing mix and affordable housing tenure mix is set out in Table 4:

Table 3: Proposed Housing Mix and Tenure Split

Dwelling Type	Total	Total Affordable	Affordable Rent	Shared Ownership
1 bed flat	23	23	15	8
2 bed flat	9	9	9	0
2 bed house	26	2		2
3 bed house	54			
TOTAL	112	34	24	10

- 6.8. The proposed development would provide a mix of one and two bedroom flats, and two and three bedroom houses. Feedback received from the pre-application set out that the lack of provision of four and five bedroom dwellings was acceptable and in accordance with the findings of the latest SHMA:

"No 5 bed homes are proposed and this accords with the latest SHMA which advises no new 5 bed homes. No 4 bed homes are proposed either which is also in line with the SHMA which identifies the need for only few 4 bed homes. The housing mix would provide a high provision of 1, 2 and 3 bed homes in accordance with the findings of the latest SHMA."

- 6.9. The majority of homes to be provided will be three bedroom dwellings. The provision of a larger number of three bedroom homes reflects the construction method proposed for the dwellings. In terms of floor area,

¹ GL Hearn September 2016

the difference between the two and three bedroom units is approximately 7m². The BoKlok approach to housing (set out in paragraph 4.9 of this report) and the provision of majority three bed units on site would maintain an affordable provision of market homes in an urban location close to Littlehampton town centre whilst providing flexible space for occupants. The proposed housing mix aligns with the need required by Arun. It is therefore considered that, when considering the overall benefits of the scheme, the proposed housing mix will make a positive addition to the housing stock of Littlehampton.

- 6.10. In respect of the proposed affordable housing mix, paragraph 6.5 of the Updated Housing Needs Evidence for Arun District Council² states that *"the majority of demand for affordable housing is for 1 and 2 bed properties...Over the last 5 years, the profile of need for different types of properties has shifted towards a need for smaller homes arising from single persons and smaller families."*
- 6.11. As set out in Table 3, the proposed development would provide 34 affordable dwellings (30% of the 112 total dwellings) to meet the 30% provision required by Policy AH SP2. The proposed mix would be split between one and two bedroom flats and two bedroom houses. The majority of the affordable housing provision would be provided in the flat block at the front of the site for efficient and cost effective management by the affordable housing provider. Two affordable houses for shared ownership would be provided on the east of the site. Twenty four of the affordable dwellings are proposed for affordable rent and 10 for shared ownership as an initial position on tenure mix. The proposed affordable housing mix has been designed to meet the most up to date SHMA recommendations so as to provide genuinely needed affordable housing in a sustainable location close the centre of Littlehampton. Additionally, as all dwellings on site are MMC products, they would not be differentiated from the market housing, ensuring the delivery of a tenure blind development.

Character and Design

- 6.12. Policy D SP1 states that *"All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development."* Policy D DM1 sets out the considerations of design quality the Council will have to any planning application.
- 6.13. The application is supported by a Design & Access Statement (DAS) prepared by ECE Architecture. This document describes and illustrates the proposed development by explaining the design approach and evolution, including scale, massing, building materials and access arrangements. The design concept has taken account of the guidance within the Arun Design Guide SPD to maximise the opportunities of the site and to thoughtfully use its constraints to create a linear park and landscape buffer to Rosemead Park.

Design

- 6.14. As a modular product that is constructed in a factory and assembled on site, the dwellings in the flat block and the house types are fixed in terms of layout, mass and scale. However, the design team have used

² GL Hearn September 2016

the opportunity to develop a material palette that is unique to the development, the local context and Littlehampton. The DAS sets out how the local area has inspired the material choices and how feature colours are used in different areas of the site, as inspired by 'The Long Bench' on the seafront.

Density

- 6.15. Local and national policy empathise the importance of making efficient use of land, particularly in areas where there is a shortage of land for housing. The proposed development has taken account of the opportunities and constraints of the site to deliver an average of 47 dwellings per hectare. Compared to the appeal scheme, the proposed development is a more efficient use of land that will result in a high quality development that will make a significant contribution towards meeting Arun's housing need whilst still providing private amenity space and parking to meet standards.

Scale

- 6.16. The analysis of building heights presented in the DAS identifies the area where the proposed flat block is sited as being an opportunity area for a taller building that would coordinate with the other taller buildings in the immediate area, comprising the Academy, Police Station and Fulford Care Home. Elsewhere, two storey semidetached and terraced houses would reflect the street patterns and massing of houses in the immediate area.

Landscaping and Public Open Space

- 6.17. The proposed layout has been designed to maximise the amount of amenity and communal public open space, as detailed in the Landscape Strategy within the DAS and in the separate landscape drawings that support the application. The main green space on the site would be the Central Green, which is addressed on three sides by houses with the fourth opening out onto Rosemead Park. The Central Green would feature the Community Hub, where areas for themed, active play, a chill zone and a grow zone would be located to provide a valuable amenity resource for future residents.
- 6.18. The Western Courtyard to the east of the flat block would supplement the Central Green by providing communal amenity space for the flats, in addition to the private amenity space on the balcony of each flat. Furthermore, the linear park over the easement of the underground utilities on the south of the site would be a multifunctional space providing a green link through the site, a landscaped buffer between the site and Rosemead Park and an area for incidental open space and play.
- 6.19. The Landscape Strategy for all areas within the site has been developed in partnership with the Ecological Mitigation Plan and Drainage Strategy to provide multifunctional spaces that contribute to providing the most amount of new habitat on the site. Additionally, the Landscape Strategy has addressed comments within the pre-application response by providing more areas of landscaping to break up the areas of parking around the site. The Landscape Strategy has also considered the uses around the site; new fencing to the gardens that border the Academy and Nursery will reinforce these boundaries, whilst elsewhere the boundaries will be landscaped.

Highways and Parking

6.20. The proposed development is located in the built up area of Littlehampton where it is located within easy access of established public transport services and the existing pedestrian and cycle facilities that link the site with the town centre. Policy T SP1 states that the Council will support transport and development which:

- a. *"Is designed to reduce the need to travel by car by identifying opportunities to improve access to public transport services and passenger transport services whilst making provision for safe access to the highway network through improvements to the existing road network and the promotion of vehicles which use low-carbon energy.*
- b. *Is incorporated into the District's green infrastructure network and gives priority to pedestrian and cycle movements.*
- c. *Protects committed and indicative lines of major road schemes from development and, where applicable, contributes towards new road schemes which improve north-south links between Bognor Regis and Littlehampton and the A27, to ensure that they are delivered in line with strategic growth in the District;*
- d. *Incorporates appropriate levels of parking in line with West Sussex County Council guidance on parking provision and the forthcoming Arun Design Guide taking into consideration the impact of development upon on-street parking.*
- e. *is supported by an effective and deliverable Transport Assessment which demonstrates that the transport effects of development on the local and strategic road network can be satisfactorily mitigated and a Travel Plan, which is effective and deliverable.*
- f. *Explains how the development has been designed to:*
 - i. *accommodate the efficient delivery of goods and supplies;*
 - ii. *give priority to pedestrian and cycle movements and have access to high quality public transport facilities;*
 - iii. *create safe and secure layouts for traffic, cyclists and pedestrians whilst avoiding street clutter;*
 - iv. *incorporate facilities for charging electric and plug-in hybrid vehicles (where charging facilities are to be omitted from the development, evidence of market demand and viability must be provided);*
 - and
 - v. *consider the needs of people with disabilities by all modes of transport.*
- g. *Provides improved crossing points over the railway line to improve transport links between the coast and the A27, in particular at Ford."*

6.21. In accordance with criterion e. the application is supported by a Transport Assessment (TA) prepared by RGP (March 2021). The application is also supported by a Travel Plan prepared by RGP (March 2021). The TA assesses the site's accessibility in sustainable travel terms as well as the site's potential net highway impact on the existing highway network. The objective of the Travel Plan is to actively encourage sustainable travel to and from the site and to provide on-site infrastructure to facilitate sustainable travel/reduce the need to travel. It sets out a number of measures that will be implemented to promote sustainable travel, which include:

- Residents welcome packs
- Public Transport information and discounts

- Flexible travels vouchers
- Car Club membership
- Walking and cycling routes to encourage walking and cycling

6.22. The measures to be set out in the Travel Plan, which would be secured through a legal agreement, are expected to reduce the percentage of private vehicular trips and increase the percentage of journeys made by more sustainable modes of transport thus promoting a modal shift.

Access and Internal Roads

6.23. The proposed access would be in the same location as that under the allowed appeal scheme. The pre-application response recognises this and states that “*The principle of the suitability of the vehicular access onto the Fitzalan Link Road has already been established as being acceptable under the allowed appeal in 2016.*” The pre-app response also recognises that the proposed access onto Fitzalan Link Road was the subject of a Stage 1 Road Safety Audit under the appeal scheme, with the Auditor not raising any issues relating to the access. An additional Road Safety Audit was undertaken as part of the TA. The Auditors noted two issues relating to visibility splays and an observed level of queuing on Fitzalan Road. The TA clarifies that visibility splays cross land that are entirely public highway and that the opening of the complete Fitzalan Link Road would likely dissipate any queues. The proposed development would provide suitable access onto Fitzalan Road as guided by paragraph 4.3.11 of the Littlehampton Neighbourhood Plan.

6.24. The internal layout of the site has been designed with consideration of Manual for Streets guidance as well as West Sussex County Council’s ‘Local Design Guide: Supplementary Guidance for Residential Development Proposals’. The proposed layout has been designed to encourage low vehicle speeds whilst accommodating the necessary vehicle movements. Approximately 120 metres into the site, the primary route would become a shared surface, with suitable service margins and carriageway widths to suit the needs for car parking and servicing. All necessary vehicles can access and egress safely. A large refuse vehicle (the largest vehicle anticipated) can travel through the site safely; tracking is demonstrated in the TA.

6.25. The measures to be set out in the Travel Plan that will be secured through a legal agreement are expected to reduce the percentage of private vehicular trips and increase the percentage of journeys made by more sustainable modes of transport.

Car Parking

6.26. The proposed development would provide 178 car parking spaces within the site. The proposed levels of car parking have been established through detailed discussions with Arun District Council in relation to its parking standards and the requirements based on the accessibility of the site, as detailed in the TA.

6.27. The Arun Parking Standards SPD (January 2020) derives expected levels of car parking based upon a ‘Parking Behaviour Zone’ system. This system is defined by Ward boundaries as opposed to any evidence of accessibility; this creates a conflict between what is in the grounds as opposed to within the SPD. In the case of the site, despite being within the built up area of Littlehampton, it is classed as being with a ‘Peri-Rural’ (large village or small settlement close to towns) Zone instead of an Urban Zone. Through discussion with Arun Officers following the pre-application, it has been agreed that car parking provision on the site

should reflect Zone 4 (Urban) standards. Confirmation of this agreement is provided as an Appendix C to the TA.

- 6.28. The TA sets out reasoned justification behind the proposed number of car parking spaces with the intention of providing appropriate levels of parking that reduce on-street parking and encourage a step change towards more sustainable forms of transport. The proposed number of car parking spaces are in accordance with the Council's adopted standards with regard to criterion d. of Policy T SP1 and are at an appropriate level to encourage sustainable modes of transport, whilst ensuring that there is no disruption to the local highway through on-street parking.

Electric Car Charging

- 6.29. The Arun Parking Standards SPD sets out that, by 2023, 100% of houses with a driveway and 30% of all other development should have active EV charging points. The application is supported by an EV Charging Concept Plan prepared by Pod Point, which is included within the TA. This demonstrates that the proposed development would be able to achieve compliance with current and future EV charging standards.

Walking and Cycling

- 6.30. Permeable routes through the site will link to the existing facilities on Fitzalan Road and to the south of the site to encourage walking and cycling. Each dwelling will feature secure bicycle storage to meet the standards set out in the Arun Parking Standards SPD.

Conclusion

- 6.31. The comprehensive Transport Assessment and Travel Plan that support the application demonstrate that the proposed development accords with the requirements of Policy T SP1.

Residential Amenity

- 6.32. The BoKlok model is based around providing future residents with the space they need to live their lives in high quality living conditions.

Internal Space

- 6.33. In accordance with Policy D DM2, all dwellings would be constructed to exceed the Nationally Described Space standards. The DAS and drawings that accompany the application demonstrate the floorplans and internal floorspace of every unit. Each dwelling would receive good standards of natural light and outlook.

External Space

- 6.34. H.04 of the Arun Design Guide SPD provides guidance for residential amenity spaces. Following the pre-application, all amenity spaces have been designed to provide private and communal amenity areas in accordance with this guidance. All rear gardens would be at least 10.5m in depth and each balcony would provide at least 3sqm of usable space. Additionally, the areas of public open space within the site will be multi-functional in providing a range of facilities for use by future residents. The proposed development would provide high quality amenity space for all residents in accordance with the Arun Design Guide SPD.

Noise

6.35. Policy QE DM1 seeks to protect residential development from noise. The policy states that:

“Residential development likely to experience noise from road, rail or air... must:

- a. Be supported by a noise exposure category (NEC) assessment and designed to ensure that residents will not be adversely affected by noise.*
- b. Consider both the likely level of exposure at the time of application and any increases that might be reasonably expected in the foreseeable future.”*

6.36. J.06 of the Arun Design Guide SPD provides guidance to ensure that residential amenity is not compromised by unacceptable noise. The application is supported by an Acoustic Planning Assessment prepared by RBA Acoustics (February 2021). The Assessment identifies the main source of expected noise being the Fitzalan Link Road when it is operational. As the Fitzalan Link Road is not yet operational, noise levels have been predicted across the site based on road traffic noise level predictions from planning application LU/234/16/RES (Reserved Matters Application for Fitzalan Link Road) through the use of 3D acoustic modelling software. The Assessment also considers and the potential impact of the school and nursery that are adjacent to the site.

6.37. The Assessment addresses the worst case scenario for noise on the site and identifies that appropriate internal noise levels can be achieved in all internal spaces through the use of a standard glazing product. Additionally, the Assessment identifies that mitigation measures will not be required for external private amenity areas. It is considered that the proposed development would provide a high standard of amenity in respect to noise with regard to adopted local policy and guidance.

Neighbouring Amenity

6.38. The closest uses to the site comprise the Littlehampton Academy to the north and the Littlehampton Day Nursery to the east. Dwellings within the site closest to these uses would be arranged with their rear gardens on the boundary. Each rear garden would meet or exceed the required minimum depth and would be bounded by a close board wooden fence so as to provide an appropriate buffer in relation to those uses.

6.39. The closest residential properties to the site are found east of the access to the nursery and to the south of the footpath and cycle route that runs along the south boundary of the site. It is considered that, for these dwellings, the separation distance between them and the proposed dwellings would preserve neighbouring amenity.

Ecology

6.40. The application is supported by a Preliminary Ecological Appraisal (PEA) prepared by Urban Edge (August 2020). The PEA identifies the habitats on the site that have developed since the Littlehampton Community School was demolished; the site comprises circa 2.4ha of previously developed land which is comprised predominantly of patchy semi improved grassland, with bramble scrub, tall ruderal vegetation, and young scattered trees. Although the PEA identified the majority of land proposed for development as being of low ecological value, it recommended that presence/absence surveys for reptiles are undertaken. As a result,

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savills

a Reptile Survey (Urban Edge, November 2020) was commissioned to establish the presence or likely absence of reptiles on the site. Seven surveys were undertaken between 14 September and 1 October 2020. The Reptile Survey recorded no observations of reptiles, skin sloughs, eggs or other signs of reptile presence during the course of the survey period. The results of the Reptile Survey provide a good level of certainty that reptiles were likely to be absent from the survey area during the 2020 season. As a result, the proposed development would not impact adversely on any protected species.

Biodiversity Net Gain

- 6.41. The proposed development would result in permanent losses of the existing habits on the site, which the PEA identify as being of relatively low ecological value and of importance at the site level only.
- 6.42. Policy ENV SP1 states that the Council will *"Encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment through the development process... Where possible it shall also promote the creation of new areas for habitats and species."*
- 6.43. Policy ENV DM5 sets out that *"Development schemes, shall in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site."* The PEA includes a section for recommendations for Biodiversity Net Gain (BNG), as replicated in the table below:

Table 4: Biodiversity Net Gain Recommendations from Preliminary Ecological Appraisal

Recommendation Number	Biodiversity Net Gain Recommendation
1	Buffers of less intensively managed vegetation (e.g. coarse grasses and wildflowers) will be created within soft landscaped areas to maintain/enhance ecological connectivity.
2	Hedgerow creation and/or restoration will use a range of native fruit, seed, nut and nectar bearing shrub species of local provenance.
3	The site's landscaping plans will utilise plant species which encourage bats by providing additional food sources or roosting opportunities.
4	Habitat piles for amphibians, invertebrates and reptiles will be created within areas of retained rough grassland, scrub or woodland.
5	The value of the site for birds will be enhanced by installing a range of artificial nest boxes onto new buildings and retained trees.
6	The value of the site for bats will be enhanced by installing a range of artificial roost boxes onto new buildings and retained trees.

- 6.44. These recommendations have been implemented in the proposed Landscaping Strategy and Ecological Enhancement Plan, which have been developed in partnership to support the application. The Biodiversity Metric 2.0 Calculation Tool has been used to understand the impact of the proposed development and habitat creation on the site. This identifies that there would be a net loss in habitat units on the site, but the proposed development would maximise the creation of areas for new habitats and species. New planting of native tree and hedge species would be undertaken throughout the site and new habitats created through

water features and meadow planting, which would be managed to ensure they are successfully delivered. Additionally, a large number of nesting and roosting habitat would be created, which is not recognised by the BNG metric. Every effort has been made to maximise and achieve BNG on this previously developed site in accordance with Policy ENV DM5.

Trees

- 6.45. Policy ENV DM4 states that *“Development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order(s), (TPO) identified as Ancient Woodland, in a Conservation Area or contributing to local amenity, will not be damaged or destroyed now and as they reach maturity.”* The application is supported by an Arboricultural Implications Report prepared by SJA Trees (March 2021). The Report identifies that there are no trees on the site that meet the criteria within Policy ENV DM4. The Report also identifies the trees and groups of trees that are to be removed as part of the proposed development. The Report does identify that several off site trees, which are in close proximity to the site, are covered by two Tree Preservation Orders. None of the off-site trees covered by a Tree Preservation Order are to be removed or pruned and the Tree Protection Plan attached as an appendix to the Report details how these trees would be protected through the construction process in accordance with Policy ENV DM4. The Landscape Strategy and drawings propose considerable tree planting to improve the arboricultural character of the area.

Flood Risk & Drainage

- 6.46. Policy W SP1 states:

“The Council will support development that:

- a. is appropriately located, taking account of flood risk and promotes the incorporation of appropriate mitigation measures into new development, particularly Sustainable Drainage Systems that reduces the creation and flow of surface water and improves water quality.*
- b. reduces the risk to homes and places of work from flooding whilst increasing biodiversity;*
- c. delivers a range of community benefits including enhancing the quality of life and providing greater resistance to the impact of climate change.”*

- 6.47. The application is supported by a Flood Risk Assessment and a Drainage Strategy and Water Quality Management Report, both prepared by AKSWard (February 2021). The Assessment identifies that the site is located wholly within Flood Zone 1 on the Government’s Flood Map for Planning, which is at the lowest risk of flooding. The proposed development has been designed to ensure there is no increased flood risk to the site and surrounding areas for all storm events up to and including 100 year plus 40% climate change storm event. As a result, it is considered that the proposed development is appropriately located and would reduce the risk to homes from flooding.

- 6.48. The Assessment also identifies that there is no existing drainage serving the site although the previous school on the site would have been connected to the public sewer system. Additionally, the Assessment identifies that the ground conditions on the site consist of impermeable clay over structureless chalk. As a result, there is a high water table that results in infiltration not being viable on the site. Policy W DM3 states that *“To increase the levels of water capture and storage and improve water quality, all development must*

identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS), appropriate to the size of development, at an early stage of the design process. Proposals for both major and minor development proposals must incorporate SUDS within the private areas of the development in order to provide source control features to the overall SUDS design...Proposals for major development must also integrate SUDS within public open spaces and roads, reflecting discussion with the appropriate bodies."

- 6.49. The application is also supported by a Water Quality Management Report, prepared by AKSWard (February 2021). The Report sets out a sequential test of the potential options for disposing of surface water, with the only suitable option being to attenuate surface water on the site before discharge via flow control device into the public sewer system. The attenuation system will include rain gardens around the largest area of public open space that will have visual and ecological benefits. Proposed foul water will be discharged into a new public foul sewer that will discharge into the public foul sewer to the south of the site. It is considered that the proposed development would minimise the impact on the water environment with regard to adopted local policy and guidance.

Ground Conditions and Contamination

- 6.50. Paragraph 118 of the NPPF states that planning decisions should give substantial weight to the value of using suitable brownfield land and support appropriate remediation of contaminated land. Paragraph 170 states that planning decisions should contribute to and enhance the natural environment by remediating contaminated land where appropriate. Furthermore, paragraph 178 states that planning decisions should ensure that a site is suitable for its proposed use, taking account of ground conditions and risks arising from land instability and contamination.
- 6.51. Policy QE DM4 states that *"The Council promotes, and will permit, the use of previously developed land and the remediation of contaminated land to ensure that land is brought back into use."* The Policy continues to state that *"Prior to any development, the Council will require evidence to show that unacceptable risk from contamination will be successfully addressed through remediation without undue environmental impact during and following the development."*
- 6.52. The application is supported by a Phase 1 Desk Study, Site Reconnaissance & Phase II Site Investigation Report (Leap Environmental, 28 July 2020) and a letter that sets out further site investigation. The Report found that the made ground soils beneath the site are impacted with the PAH compound benzo(a)pyrene and naphthalene. As a result, remediation is recommended; the application is supported through a Remediation Method Statement prepared by (Leap Environmental, 12 March 2021). The Strategy proposes a site wide strip of the site to remove the contaminated soils with re-use where possible. As a result, it is considered that the Council should support the redevelopment of this previously developed site which meets the aims of Policy QE DM4.

Heritage

- 6.53. The site is located north of Littlehampton East Street Conservation Area. The Conservation Areas Supplementary Planning Guidance document (October 2000) states that *"The special character and appearance of the area largely derives from the great variety in age (although the majority of buildings are Victorian/Edwardian), style, form, function and materials of the buildings within the area."* The document also recognises that the area is *"somewhat fragmented by modern development"*.

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- 6.54. Policy HER SP1 sets out that conservation areas will be given the highest level of protection. Criterion f. of policy HER DM3 states that planning permission will normally be granted for proposals provided that they do not harm important views into or out of the conservation area. The site is separated from the conservation area by approximately 175m at the closest point. In addition, the Littlehampton Police Station, a substantial three storey building, sits between the two. It is considered that the proposed development would not affect views into or out of the conservation area as a result of the separation distance and presence of the Police Station.
- 6.55. Policy HER DM1 sets out that proposals affecting listed buildings should protect and, where possible, enhance the setting of listed buildings. The nearest listed building is the Grade II listed barn and wall that forms part of the Fulford Care Home site, which is located on the East Street and Fitzalan Road roundabout. Between the site and the listed building are more modern buildings within the care home and residential buildings south of Rosemead Park. Owing to the separation distance and buildings between the site and the listed building, it is considered that the proposal would not affect the setting of the listed building in accordance with local and national policy.

Air Quality

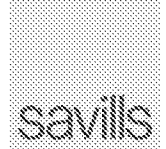
- 6.56. Policy QE DM3 states that *"All major development proposals will be required to assess the likely impacts of the development on air quality and mitigate any negative impacts."* K.05 of the Arun Design Guide SPD also sets out that proposals should be informed by Air Quality Assessments. The application is supported by an Air Quality Assessment prepared by Hydrock (March 2021), which provides a review of baseline air quality in the area and considers the air quality that future residents would experience, assesses the potential impact of construction dust and sets out the results of a damage cost and emissions mitigation assessment.
- 6.57. The Assessment identifies that the future occupants would experience air quality within National Air Quality Objectives and suggests mitigation measure to reduce the impacts of dust at the construction phase. The damage cost and emissions mitigation assessment identifies that there would be damage costs of £20,320.00 and proposes the provision of flexible travel vouchers of that amount to residents as mitigation. It is considered that the proposed mitigation measures would ensure the proposed development would accord with Policy QE DM3.

Energy and Sustainability

- 6.58. Policy ECC SP2 states that *"All new residential and commercial development will be expected to be energy efficient... All major developments must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable. Energy efficiency measures will be taken into consideration when the total predicted energy requirements are calculated. The Council will consider 'allowable solutions' where it is clearly demonstrated that the provision of on site renewable or low carbon energy generation is unviable or not feasible."*
- 6.59. The BoKlok model is based upon making it feasible for more people to live sustainably. The application is supported by an Energy and Sustainability Statement prepared by Hydrock (March 2021). The Statement highlights the factory built, modular construction method of the proposed dwellings would ensure a low embodied carbon footprint and the proposed energy solutions to provide heating and hot water that would

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provide a 27% reduction in energy demand when compared to typical systems. The proposed development would be energy efficient without the need for energy generation on site.

Construction

- 6.60. The application is supported by an outline Construction Environmental Management Plan (CEMP) (RGP, March 2021). The CEMP would ensure that commitments to environmental protection are adhered to throughout the construction of the proposed development on the site. BoKlok would welcome further discussion on this document as the application progresses.

Draft Section 106 Agreement

- 6.61. The application is accompanied by a Draft S106 Agreement to ensure early negotiation with the Council. The Heads of Terms included within the draft reflect discussions had to date with ADC. BoKlok would welcome further discussion on this document as the application progresses.

7. Conclusion

- 7.1. This application has been prepared to take account of the pre-application advice received from Arun District Council and the feedback received from engagement with the local community. The proposed development has been shaped by the external comments received and a series of technical studies that demonstrate the considered approach taken to addressing the opportunities and constraints of the site. The proposed development would regenerate this previously developed site to deliver a landscape led scheme that would make efficient use of the site to provide a high quality environment and living conditions for future residents. In addition, the proposed development would deliver a range of on-site ecological enhancement measures and amenities for residents.
- 7.2. The mix of dwellings delivered would create a sustainable new community within walking and cycling distance of a range of services and Littlehampton town centre. The delivery of 112 new homes, of which 30% would be affordable, would also make a significant contribution towards meeting the District's identified housing needs on this previously developed site within the built up area boundary of Littlehampton.
- 7.3. The proposed development accords with the Council's spatial strategy and development plan. It is considered that a positive planning decision is therefore appropriate. We would be pleased to clarify and discuss any matters arising during the determination of the application.

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