

SNPL 463580

15 July 2021

savills

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Principal Planning Officer
Arun District Council
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Dear Anita

APPLICATION REFERENCE LU/116/21/PL

Following our meeting held Thursday 17 June 2021, please find the following information to address matters raised in respect of:

- Affordable Housing
- Public Open Space
- Drainage
- Noise
- Littlehampton Town Council
- Material benefits of the proposed development and the planning balance

Please also see the following table that sets out the amended plans and additional information submitted with this letter.

Drawing/Document	Drawing Number and Revision to be Superseded	Amended Drawing Number and Revision
Illustrative Site Plan	LTH-ECE-XX-XX-DR-A-SL-5012 P09	LTH-ECE-XX-XX-DR-A-SL-5012 P11
Affordable Housing Plan	LTH-ECE-XX-XX-DR-A-XX-5016 P04	LTH-ECE-XX-XX-DR-A-XX-5016 P05
Landscape Masterplan	LTH-NTA-XX-00-DR-L-0501 P03	LTH-NTA-XX-00-DR-L-0501 P04
Landscape GA Hardworks, 1 of 2	LTH-NTA-XX-00-DR-L-0502 P03	LTH-NTA-XX-00-DR-L-0502 P04
Landscape GA Hardworks, 2 of 2	LTH-NTA-XX-00-DR-L-0503 P03	LTH-NTA-XX-00-DR-L-0503 P04
Softworks Location Plan	LTH-NTA-XX-00-DR-L-0504 P03	LTH-NTA-XX-00-DR-L-0504 P04
Landscape GA Softworks, 1 of 2	LTH-NTA-XX-00-DR-L-0505 P03	LTH-NTA-XX-00-DR-L-0505 P04
Landscape GA Softworks, 2 of 2	LTH-NTA-XX-00-DR-L-0506 P03	LTH-NTA-XX-00-DR-L-0506 P04
Letter from VIVID	-	-
Proposed Drainage Strategy	-	-
Noise Response	-	-

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ARUN DISTRICT COUNCIL LU/116/21/PL



Drawing/Document	Drawing Number and Revision to be Superseded	Amended Drawing Number and Revision
Email to Littlehampton Town Council	-	-
Aerial Views submitted to Littlehampton Town Council	-	-

Affordable Housing

We have had regard to the ADC Housing Strategy comments uploaded to the application webpage on 30 April 2021 and met with the Housing Strategy Manager on 11 June 2021.

BoKlok is working in close partnership with VIVID Housing Ltd (hereafter referred to as 'VIVID') as the Registered Provider (RP) on the proposed development to deliver affordable dwellings that would provide benefits for future occupants of the site. The provision of 34 affordable dwellings on a previously developed site close to the centre of Littlehampton would significantly assist with addressing the identified need for affordable dwellings in Arun in a sustainable location. This proposed scheme would deliver significantly more affordable dwellings than allowed by the previous planning permission on the site under application LU/55/15/OUT, the Section 106 (S106) for which only secured 14 of the 68 dwellings proposed (20%) as affordable dwellings.

The proposed development would provide 34 affordable dwellings (30% of the 112 total dwellings) to meet the 30% affordable provision required by Policy AH SP2. As discussed in the meeting with the Housing Strategy Manager, the open market homes would be provided on BoKlok's 'Left-To-Live' model, which takes into account the average salary of a full-time worker, their living expenses and their mortgage borrowing capacity. This would allow for more affordable market homes that would enable people easier access to owning their own home.

Following the issue of comments from and a meeting with Arun District Council's (ADC) Housing Strategy Manager, BoKlok and have considered the comments carefully and an adjustment to the affordable tenure mix has been proposed. The tenure of the two affordable houses that are shown on the submitted Affordable Housing Plan as being for shared ownership have been adjusted to be for affordable rent. Please see the amended Affordable Housing Plan to demonstrate this modification. This ensures that the proposed development would be compliant with Policy AH SP2 in respect of affordable tenure mix.

All dwellings within the proposed apartment block would be affordable. Although this does not meet the desired cluster arrangements suggested by ADC's Housing Strategy Manager, it reflects the needs of VIVID. By having the affordable apartments in a single block, VIVID is able to take on the freehold of the apartment block, with associated estate management benefits. This would enable VIVID to minimise costs and manage the dwellings more effectively, thereby reducing the service charging to the benefit of future occupants. VIVID has provided a letter of support for this arrangement that sets out their preference for acquiring and managing the affordable housing provision as proposed, which is attached to this submission.

Furthermore, from an urban design perspective it would not be possible to deliver this level of affordable housing if the proposed apartment block is split into smaller blocks. The scheme layout is already very tight and there would not be enough space to accommodate multiple smaller blocks without losing units. As a result, it would not be possible to adjust the dispersion of affordable dwellings through the scheme.

ADC's evidence base¹ identifies that *"the majority of demand for affordable housing is for 1 and 2 bed properties... Over the last 4 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."* The mix of the proposed apartment

¹ Paragraph 6.5 of Updated Housing Needs Evidence (GL Hearn, September 2016)

block comprises 23 one-bedroom apartments and nine two-bedroom apartments to address this identified need that is demonstrated in Figure 10 of the evidence base document² and the feedback received at the pre-application stage where there was no objection to the mix proposed.

The meeting with ADC's Housing Strategy Manager set out a need for more two bedroom dwellings. However, the nature of the modular product means that the proposed apartment block cannot be modified to include more two-bedroom apartments; the two-bedroom apartments have a larger floor area that cannot fit on the footprint of the proposed apartment block. There is very limited space on the site to increase the size of the apartment block to accommodate this request. It would ultimately result in the loss of units, which would impact on the viability of the scheme and BoKlok's ability to deliver the project. As a result the proposed apartment block is fixed in terms of the mix of dwellings within.

Public Open Space

We have had regard to the ADC Greenspace comments dated 27 May 2021 and our landscape consultant spoke with the officer on 15 June 2021.

As submitted, the proposed development would provide approximately 2,212 m² of Public Open Space (POS) against the requirement of 9,240 m² as set out within the comments from the Leisure and Landscape Officer and informed by the ADC Open Space SPD (January 2020). The calculation of POS required by the SPD relates to a population determined by the proposed number of dwellings multiplied by an occupancy rate of 2.2. The inflexible nature of the calculation does not take account of the size of the site, its context, the quality of the open space provided or other areas of POS nearby.

The proposed development is located on a previously developed site close the centre of Littlehampton. The site is surrounded on three sides by relatively dense built development or roads. In this context the pattern of surrounding development does not lend itself to a low density scheme, with a large amount of POS provided on site. The site is also located adjacent and would connect to the existing POS facility of Rosemead Park, which includes both informal open space and a formal play area. The close proximity of Rosemead Park would enable future occupants and the existing community to make use of the space and facilities in each area of POS.

The proposed landscaping strategy has been developed to maximise the range of facilities on the site to encourage use of the POS instead of it simply being undeveloped space with no other purpose. The Central Green would feature the Community Hub, where areas for informal play, a chill zone and a grow zone would be located to provide a valuable amenity resource for future residents. The Western Courtyard to the east of the flat block would supplement the Central Green by providing communal amenity space for the flats. 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.

Based on feedback and further discussion with the Leisure and Landscape Officer, the POS provision has been modified to remove formal play from within the Central Green, as shown on the amended drawings. This modification has increased the amount of POS on the site to approximately 2,445 m². Whilst this figure is below the figure required by the SPD, BoKlok is willing to provide contributions toward offsite play and POS via S106 to ensure that facilities are upgraded in line with the ADC Greenspace comments.

Drainage

We have had regard to the email comments from the ADC Drainage Engineer dated 24 June 2021 that supplement the original consultation response dated 03 June 2021. Our drainage consultant has proposed an updated strategy (attached to this submission) that we hope to agree with the Drainage Engineer. We would appreciate your assistance with arranging a 30 minute call between our drainage consultant and Paul Cann to

² Figure 10 of Updated Housing Needs Evidence (GL Hearn, September 2016)

discuss the methodology that underpins the submitted drainage information that supports the application and the updated strategy.

Noise

We have had regard to the comments from the Environmental Health Officer (EHO) dated 29 June 2021. This letter is supported by a response from our acoustic consultant to the matters raised by the EHO that will form the basis of an agenda for a call to be held between two on the morning of Friday 16 July 2021. We hope that this meeting allows for technical discussion of the matters raised and agreement that the proposed development would provide a high standard of amenity in respect of noise from the adjacent land uses.

Littlehampton Town Council

We have had regard to the comments from the Town Council and have submitted a written response and an additional aerial perspective of the scheme for the Town Council to consider in their next Planning and Transportation Committee meeting to be held 19 July 2021. We hope that these suitably address the matters raised in their comments to allow them to remove their objection to the proposed development.

Benefits of the scheme and the planning balance

The proposed development would create a sustainable new community close to Littlehampton town centre using an innovative product that would create a sense of place through a material palette that is unique to the development and Littlehampton. The delivery of 112 homes, of which 30% would be affordable, would make efficient use of land and would deliver a significant contribution towards meeting the District's identified housing affordable needs and overall housing need on a previously developed site. This would assist with addressing the lack of housing supply and persistent underdelivery of housing in the district. Additionally, the affordability of the proposed market dwellings would enable people easier access to owning their own home. It is considered that great weight should be given to the material benefits of the proposed development.

Yours sincerely



Oliver Woolf
Savills Planning