



Planning Statement

Former Bodyshop Offices, Courtwick Lane,
Littlehampton

On behalf NHS Coastal West Sussex Clinical
Commissioning Group

April 2014

www.wyg.com

creative minds safe hands

The Loft, St Clairs Farm, Wickham Road, Droxford, Hampshire SO32 3PW

Tel: 01489 872929

Email: jeremy.heppell@wyg.com



Document Control

Project: Littlehampton GP Surgery
Client: NHS Coastal West Sussex
Job Number: HP13077
File Origin: HP13077/Reports/Planning Statement

Document Checking:

Prepared by:	Jacob Goodenough	Signed:	JG
--------------	------------------	---------	----

Checked by:	Jonathan Greenberg	Signed:	JG
-------------	--------------------	---------	----

Verified by:	Jeremy Heppell	Signed:	JH
--------------	----------------	---------	----

Issue	Date	Status
1	14 March 2014	Draft
2	2 April 2014	Second Draft
3	23 April 2014	Final

www.wyg.com

creative minds safe hands

The Loft, St Clairs Farm, Wickham Road, Droxford, Hampshire SO32 3PW

Tel: 01489 872929

Email: jeremy.heppell@wyg.com



Contents Page

1. Introduction
2. Site Location and Surroundings
3. The Proposed Development
4. Planning Planning Context
5. Planning Considerations
6. Summary and Conclusions

Appendices

1. Site Location Plan
2. Aerial Photograph
3. Site Layout Plan



1.0 Introduction

- 1.1 WYG Planning and Environment has prepared this Planning Statement on behalf of NHS Coastal West Sussex Clinical Commissioning Group, in support of the full planning application for the relocation of Arun Medical Group's (AMG) premises on East Street and satellite surgery in East Preston to premises in Wick, in north Littlehampton. The statement describes the proposal and assesses it against the relevant Development Plan policies and other material planning considerations including the National Planning Policy Framework (NPPF) and the recently published Planning Practice Guidance (PPG).
- 1.2 The relocation site comprises a portion of a vacant Enterprise Hub adjacent to Morrisons Supermarket, Courtwick Lane, Wick. A Site Location Plan is set out at **APPENDIX 1** and an Aerial Photograph at **APPENDIX 2**.
- 1.3 Full planning permission is sought for the change of use of part of the existing Enterprise Hub building to a healthcare facility with associated parking, landscaping and highways works. The proposal incorporates a minor extension to the north side of the existing building to create an entrance lobby, stairwell and lift. In addition, a new entrance to the car park is proposed to take access from Courtwick Lane (see Site Layout Plan at **APPENDIX 3**).
- 1.4 The proposal seeks to address a deficit in primary health care facilities in north Littlehampton, with the aim of tackling known issues of deprivation in this area and improving facilities more generally within Littlehampton as a whole.
- 1.5 Detailed site layout plans, floorplans, elevational and sectional drawings are submitted with this application. This statement is also accompanied by the following supporting documents:
- Design and Access Statement
 - Statement of Community Involvement
 - Social and Economic Benefits Statement



Planning Statement

- Transport Statement
- Arboricultural Assessment

1.6 This Planning Statement sets out a brief description of the site and surroundings before going on to consider the status and appropriate weight to be given to the relevant adopted and emerging Local Plan policies. The statement then sets out the material planning considerations which must be taken into account in the determination of this application including the provisions of the NPPF and PPG (March 2014).



2.0 Site Location and Surroundings

- 2.1 The site is situated to the west of Lyminster Road and south of Courtwick Lane and it currently comprises a portion of the vacant enterprise hub building, which was delivered as part of the Morrisons Superstore development south east of the site. The site is approximately 1.8km north of Littlehampton Town Centre.
- 2.2 The site measures approximately 0.25 hectares and the existing building proposed for conversion has a gross internal floor area of 947 m². Access to the site is currently obtained west of the site off Courtwick Lane. A Site Location Plan and Aerial Photograph are set out at Appendices 1 and 2.
- 2.3 The surrounding area is characterised by a mix of uses including predominantly residential development to the north and east of the site. Immediately west of the application site is a mix of business, commercial and industrial uses. Immediately to the south of the site is the car park and petrol filling station associated with the Morrisons supermarket. There is some existing tree and scrub planting along the north and east boundaries of the site. Access to the site will be obtained through a break in this vegetation to the north.
- 2.4 Full details of the site and surroundings are set out in the Design and Access Statement which accompanies the application.



3.0 The Proposed Development

- 3.1 The application seeks planning permission to convert part of the former Bodyshop offices in Courtwick Lane to create a new GP surgery with the addition of a new entrance lobby and staircase (measuring 53m²), a dedicated car park and new access from Courtwick Lane.
- 3.2 The proposals set out that the GP Practice will comprise two storeys of accommodation. On the ground floor, Arun Medical Group will have their clinical space and patient waiting areas, whilst the first floor will be split between support functions for Arun Medical Group and additional clinical space for use by visiting clinics and community services. The car park will have space for 39 parking spaces (3 of which will be disability spaces) along with an ambulance space and 10 cycle spaces.
- 3.3 The new facility will have 1,000 m² of accommodation, compared with the combined accommodation at Arun Medical Group's two current premises of circa 380 sq m. It should also be noted that the new accommodation will be considerably more efficient in terms of compliant useable net area. This will ensure sufficient capacity for both the 7,000 patients currently on the practice list at Arun Medical Group and the 5,750 patients anticipated from the new housing developments, plus capacity for additional patients.
- 3.4 The remainder of the former Bodyshop offices will continue to function as a self-contained commercial building, with its own access and car park, and will be available for use as an Enterprise Hub under the terms of the Morrisons planning permission.



4.0 Planning Policy Context

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that Local Planning Authorities must determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

4.2 The statutory development plan for the site comprises the Saved Policies of the Arun District Local Plan (2003). A further tier of local policy guidance, comprising Supplementary Planning Guidance, is also a material consideration.

4.3 This Section will begin with a review of the National Planning Policy Framework (2012) and the recently published Planning Practice Guidance (March 2014), before considering local planning policy and guidance.

National Planning Policy

4.4 The National Planning Policy Framework (NPPF) was published in March 2012. It establishes a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. Sustainable development encompasses, amongst other things, building a strong competitive economy, and supporting strong, vibrant and healthy communities. It is a requirement that Local Planning Authorities positively seek opportunities to meet the development needs of their area (Paragraph 14).

4.5 Paragraph 7 of the NPPF identifies that there are three dimensions to sustainable development: economic, social and environmental. The social role of planning involves:

"Supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being".



Planning Statement

4.6 Underpinning plan-making and decision-taking, the NPPF sets out 12 core planning principles at paragraph 17. Of particular note, these principles consider that planning should:

- Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve places in which people live their lives;
- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs; and,
- Take account of and support local strategies to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs.

4.7 Section 1 of the NPPF has regard to building a strong, competitive economy and states at paragraph 22 that:

'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose'... 'where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.'

4.8 Section 8 promotes healthy communities and states at paragraph 70 that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- 'Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- Guard against the unnecessary loss of valued facilities and services, particularly



where this would reduce the community's ability to meet its day-to-day needs;

- Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and,
- Ensure an integrated approach to considering the location of housing economic uses and community facilities and services.'

4.9 In addition Paragraph 171 goes on to state that:

'Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being.'

4.10 In terms of considering the presumption in favour of sustainable development, the NPPF states in paragraph 14 "where the development plan is absent, silent or relevant policies are out of date" that permission should be granted unless "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." It will be demonstrated in this statement and other supporting statement that, in the planning balance, the disbenefits are significantly outweighed by the positive aspects of the application proposal and therefore that planning permission should be granted.

Planning Practice Guidance

4.11 The Government recently published the Planning Practice Guidance on 6th March 2014 which sits alongside and supports the NPPF. This guidance considers what constitutes a healthy community at paragraph 005, reference ID 53-005-20140306 which states that:

'A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:



- *Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.*
- *The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.'*

Local Planning Policy

Arun District Council Local Plan, 2003

4.12 The statutory Local Plan for the area is the Saved Policies of the Arun District Local Plan, which was adopted in April 2003.

4.13 The site is currently identified as being within the defined built-up area boundary of Littlehampton. Development or redevelopment within the built-up area is generally supported by the plan, subject to compliance with other policies. It is considered that the proposals, the details of which are set out in the Design and Access Statement and supporting documents, accords with these policies, particularly those listed below:

- 4.14
- GEN 2 (Built-up Area Boundary);
 - GEN 7 (The Form of New Development);
 - GEN 12 (Parking in New Development);
 - GEN 15 (Cycling and Walking);

Emerging Local Plan (Regulation 19)

4.15 In February 2014 the Council published its Regulation 19 version of their emerging Local Plan, excluding the spatial portrait, employment and enterprise, housing allocations, transport, monitoring and implementation sections. Relevant policies within the emerging plan comprise:



- Policy SD SP2 (Built-up Area Boundary)
- Policy D DM1 (Aspects of form and design quality)
- Policy D DM4 (Extensions and alterations to existing buildings (residential and non-residential))
- Policy HWB SP1 (Health and wellbeing)
- Policy ENV DM4 (Protected Trees)

4.16 Policy HWB SP1 is of particular relevance to the application and states that:

All development shall be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities. In particular regard shall be had to:

- a) Providing or contributing to the necessary infrastructure to encourage physical exercise and health, including accessible open space, sports and recreation facilities (including outdoor fitness equipment) and safe, well promoted, walking and cycling routes.*
- b) Creating mixed use development and multi-use community buildings that reduce the need to travel by providing housing, services and employment in close proximity to each other; and*
- c) Ensuring that arts and cultural facilities are accessible to all residents and visitors to the District.*

Where new health, recreation and leisure facilities are planned, these shall be located along public transport corridors that are easily accessible to members of the wider community.

4.17 The Council's strategic objective for health, recreation and leisure is to:

"Promote strong, well integrated and cohesive communities, through the promotion of healthy lifestyles, provision of good quality accessible community facilities and a safe environment, which delivers an enhances quality of life to all. This includes meeting the needs of a growing elderly population"



- 4.18 It is anticipated that the emerging local plan will be adopted in June 2014. However, the present Publication Local Plan (excluding the aforementioned sections) is now considered a material consideration by Arun planning officers in assessing planning applications.

Supplementary Planning Guidance

Parking Standards

- 4.19 The Parking Standards document was adopted as Supplementary Planning Guidance in October 2000 by Arun District Council and complements GEN12 of the Arun District Local Plan 2003. For doctors, dentist, vets and medical centres the maximum car parking provision is 1 space per practitioner, 4 spaces for the consulting/examination room for visitors and medical staff plus one space per 20sq m of office space for administration staff. The SPG requires that parking is provided in accordance with but not limited to the following operational requirements:

- a) Car parking spaces shall be a size of 4.8m by 2.4m;
- b) Disabled spaces are to be provided at a ratio of one disabled space per 20 spaces or part thereof;
- c) Cycle spaces provided on site at a ratio of 1 space per 8 car parking spaces; and,
- d) Motorcycle parking provided at 1 space per 30 car parking spaces subject to a minimum of 1 space. Motorcycle spaces shall be a size of 1.4m by 2.3m.

Neighbourhood Plan

- 4.20 Littlehampton Town Council is in the process of preparing a Neighbourhood Plan for the local area. The plan is in draft form and has not yet been formally adopted as a result of setbacks at the examination stage. Nevertheless the provisions with the document remain relevant to the application.
- 4.21 The Town Council has been seeking local views and found the following;
- There are a number of improvements that can be made in relation to empty shops/improvements to retail offer, more frequent bus services, business



incentives/lower business rates, rents and a community hospital/health facilities.

- Improvements to health care facilities was given the highest priority by local residents. Employment was also seen as a high priority by all age groups.

4.22 The Neighbourhood plan identifies the following as key objectives and measures:

- To contribute to meeting the demand for new employment opportunities and specifically to encourage local small business and tourism ventures to grow.
 - Deliver new business incubator facility
 - Allocate new employment land
- To consolidate and improve local community services and facilities – improved health facilities.

Other Relevant Policy

Coastal West Sussex and Greater Brighton - Local Strategic Statement, 2013

4.23 The Coastal West Sussex and Greater Brighton Strategic Planning Board is led by the planning/infrastructure Portfolio Holders or Leaders of Adur, Arun, Brighton & Hove, Chichester, Lewes, West Sussex and Worthing Councils and the South Downs National Park Authority. The Local Strategic Statement *Delivering Sustainable Growth 2013-31* has been signed off by the Strategic Planning Board and all its sovereign Local Planning Authorities. The statement has four strategic objectives to underpin this vision followed by five spatial priorities for implementation.

4.24 Spatial Priority 3 relates specifically to Littlehampton. It states that Local planning authorities and their partners will work together to coordinate transport and other infrastructure improvements in Littlehampton to address existing capacity issues and enhance further opportunities for the delivery of strategic employment and housing sites. Priorities will include:



- Construction of the Lyminster Bypass (southern and northern sections) and improvements to the A259.
- Improvements to rail connections along the Arun Valley and to London.
- Improvements to River Arun flood defences.
- Further consideration of the strategic development potential at West Bank.

4.25 The Publication Version of the Local Plan is currently silent on future housing and employment provision, but Chapter 14 sets out Arun's Local Plan strategic objective for Health, Recreation & Leisure:

4.26 *"Promote strong, well integrated and cohesive communities, through the promotion of healthy lifestyles, provision of good quality accessible community facilities and a safe environment, which delivers an enhanced quality of life to all. This includes meeting the needs of a growing elderly population."*



5.0 Planning Considerations

5.1 The adopted and emerging local plan offer, at present, a relatively piecemeal policy position in Arun. The development plan comprises the saved policies of the 2003 Local Plan and the Council have identified that the emerging Local Plan is a material consideration in the determination of planning applications. The NPPF states at paragraph 14 that for decision-taking the presumption in favour of sustainable development means:

- Approving the development proposals that accord with the development plan without delay; and,
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies in this Framework indicate development should be restricted.

5.2 Both the saved local plan policies and emerging policies are silent in respect of the loss of employment land, which is considered to represent the only material planning consideration preventing the immediate change of use of this building to its proposed use.

5.3 Certainly, as the application proposes only the change of use and minor extension of the building, there are not considered to be any significant design implications and very few technical considerations. Access and parking is the key technical matter for consideration and the application is supported by Transport Statement, which identifies that the proposed parking and access arrangement accords with relevant guidance as set out in Manual for Streets and the occupiers' parking requirements. Following discussions with Morrisons, the application incorporates a pedestrian link between the surgery and Morrisons' car park. This will help to promote linked journeys and further reduce pressure on the local area for parking. The proposals will not result in any significant or detrimental highways issues and will not cause any detriment to the highway network or highway safety.



Planning Statement

- 5.4 The sites boundaries are defined by existing vegetation and it is acknowledge that two trees within the site are subject to TPOs. However, the Council has not confirmed to which trees these relate. The application is supported by an Arboricultural Implications Assessment which identifies that the proposed scheme is acceptable from an arboricultural perspective. The proposed new access will be located though a group of recently planted trees. These trees will be transplanted to another location on site to maintain screening in to and out of the site. Some poor standard trees will be removed in order to facilitate the new parking arrangement, but appropriate mitigation planting will take place to order adequately address this loss.
- 5.5 Therefore, in light of the above, the key planning consideration relates solely to the loss of part of the Enterprise Hub as an employment use. In this regard the application is supported by a Social and Economic Benefits Statement which considers this issue in full and balances the loss of the existing facility against the considerable community benefits associated with the proposed new healthcare facility.
- 5.6 In summary the Social and Economic Benefits Statement identifies that when striking this balance it is clear that there are significant social benefits associated with the proposal, and only moderate economic disbenefits. The proposals will result in the loss of between a quarter and a third of the existing Enterprise Hub, which since completion has remained unoccupied.
- 5.7 Having regard to the NPPF it states at paragraph 22 that:
- 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose'... 'where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.'*



- 5.8 When considering emerging policy HWB SP1 (Health and wellbeing) and the recently published Planning Practice Guidance, it is evident that both local and national planning initiatives seek to create healthy communities - part of which includes supporting proposals that help to address health inequalities.
- 5.9 North Littlehampton is an area of deprivation, with pockets of deprivation in River Ward and Ham Ward which are in the 10% most deprived wards within the UK. In these areas, there is a life expectancy gap of between 8 and 9 years for people compared to those who live in more affluent areas of Arun. At present there remains a deficit in primary health facilities in the north Littlehampton area and as such there is a need to provide services within this area which can tackle specific health and social needs such as obesity, drug and alcohol related conditions, sexual health, teenage pregnancy and an aging population.
- 5.10 The conclusion is therefore that the social benefits of the proposals more than outweigh any economic disbenefits, and moreover the economic disbenefits are so marginal as to be more-or-less negligible.



6.0 Summary and Conclusions

- 6.1 The application proposes the conversion of part of the former Bodyshop offices in Courtwick Lane to a self-contained GP surgery. The application is supported by a suite of technical reports and statements which identify that the proposals represent the best use of the existing building and that the proposed use can be adequately accommodated into the local area without causing demonstrable harm to neighbouring occupiers or on the local road network.
- 6.2 National, local and neighbourhood planning policies are supportive of development which improves access to community facilities and in particular those which improve health and wellbeing of a local community. As set out in this Statement, the application, which proposes the change of use of the existing building, minor extension of the building, and alterations to the access arrangements, has very limited design implications or technical considerations. The principal issues relate to the loss of part of the existing Enterprise Hub, and highways implications.
- 6.3 As discussed in this Statement and other accompanying documents, the benefits of this application significantly and unequivocally outweigh the economic disbenefits. In addition, the supporting Transport Statement identifies that the proposed use can be adequately accommodated on the local road network, and that sufficient parking is provided to minimise the pressure on surrounding streets for parking. A proposed pedestrian link to Morrisons' car park will facilitate linked journeys further helping to reduce pressure.
- 6.4 The application is therefore supported by planning policies and is appropriate in all other aspects. It is also imperative that, for the benefit of both existing and future residents in Littlehampton the project receives support for the reasons set out in this Statement and other accompanying reports.

Planning Statement



Appendices

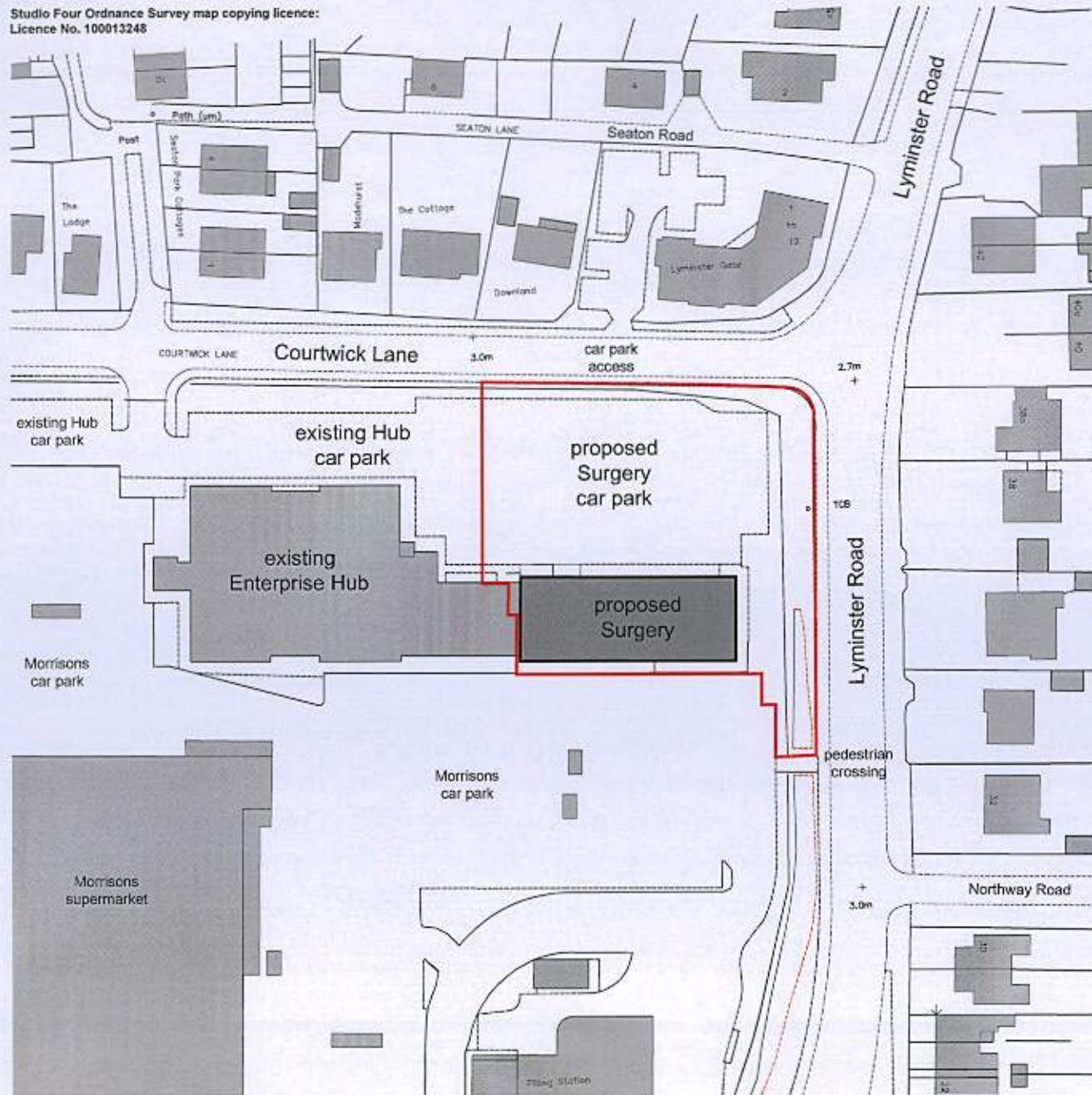


Appendix 1

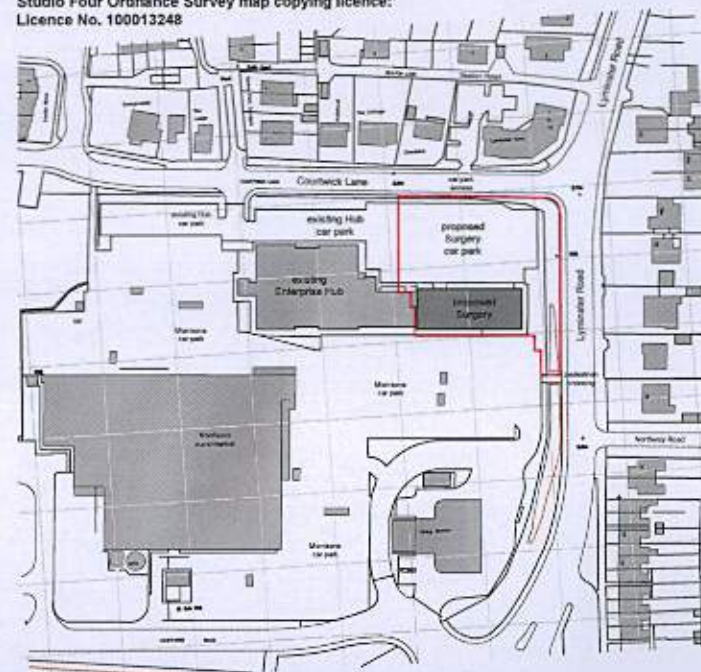
Site Location Plan

.....

Studio Four Ordnance Survey map copying licence:
Licence No. 100013248

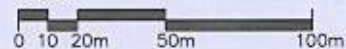


Studio Four Ordnance Survey map copying licence:
Licence No. 100013248



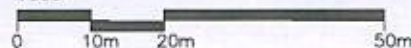
Location Plan scale 1:1250

1:1250



Block Plan scale 1:500

1:500



FOR COMMENT

8 03/04/14 Edens Incorporated 1:1250 added by SVR checked SV
4 29/03/14 Infra amendments by SVR checked SV



8 Upper High St, Winchester SO23 8UT
t: 01942 820255 f: 01942 820256
admin@studiofourarchitects.co.uk
www.studiofourarchitects.co.uk

client Community Solutions
Coastal West Sussex CCG
project New GP Surgery, Littlehampton
East Wing 'Enterprise Hub'
title Location Plan / Block Plan

date	scale	paper	drawn	checked
Feb 2014	1:1250	A2	SVR	SVR

job no.	design no.	revision
33157	01	B



Appendix 2

Aerial Photograph





Littlehampton GP Surgery, Wick

SITE AERIAL

DWG N°: HP13077

Drawn: JaG

Checked: JH

Scale: Not to Scale

Date: 24.04.2014

Notes:

This map is produced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. WYG Planning & Design, licence no: 100017603.

This drawing is for illustrative purposes only and is subject to detailed topographical survey and site investigation, including ground conditions/contaminants, drainage, design and planning/density negotiation. The feasibility of the design shown, therefore, must not be relied upon. It has not been considered in respect of the CDM Regulations.

The Loft
St Clair's Farm
Wickham Road
Droxford
Hampshire
SO32 3PW

tel: 01489 872 929
fax: 01489 872 939
www.vyg.com



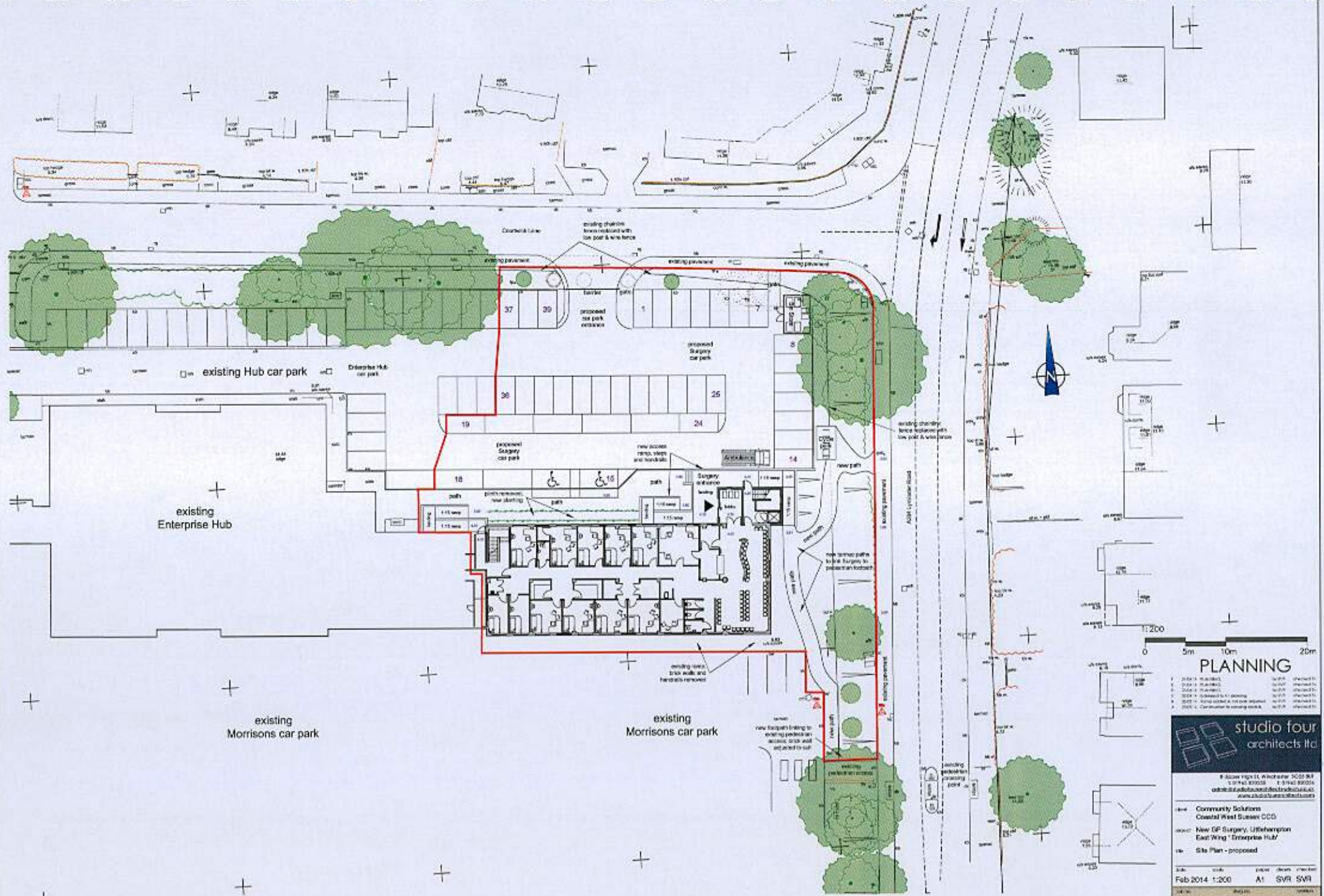
Planning Statement



Appendix 3

Site Layout Plan

.....



PLANNING

studio four architects ltd
 9 Jovan High St, Winchester SO23 9H
 01964 830035 01964 830034
 01964 830034 01964 830034
 www.studiofourarchitects.co.uk

client	Community Solutions	Coastal West Sussex CCG
project	New GP Surgery, Uththampton	East Wing 'Enterprise Hub'
file	Site Plan - proposed	
date	Feb 2014	1:200
scale	paper	drawn
checked	A1	SVR
33157	06	F

