

RAPLEYS

Planning Statement for
B8 Investments Property

LAND AT TODDINGTON LANE, WEST SUSSEX

May 2017

Our Ref: BMW/352/65/1

51 Great Marlborough Street, London W1F 7JT

Contents

1	Introduction	1
2	Site and Surroundings	3
3	Site Background and History	4
4	The Proposal	6
5	Planning Policy	7
6	Planning Considerations	18
7	Conclusions	23

Appendices

Appendix 1	Site Location Plan
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1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Rapleys LLP, on behalf of B8 Investments Property, and is submitted in support of a full planning application for the proposed development in respect of the land at Toddington Lane, Littlehampton, West Sussex BN17 7PP.

THE APPLICANT

- 1.2 B8 Investments Property ("the Applicant") own the site which is surplus to current requirements. The Applicant primarily operates a skip hire firm specialising in construction and commercial waste management with experience across Sussex.

THE PROPOSAL

- 1.3 The application seeks full planning permission to redevelop the site to provide 10 residential dwellings. This will include landscaping, open space, improved access to the site and associated car parking, cycle parking and refuse storage.

- 1.4 The full description of development is:

"Demolition of existing buildings, erection of 10 residential dwellings (Use Class C3) with associated open space, landscaping, parking, and access"

STRUCTURE OF PLANNING STATEMENT

- 1.5 This Statement identifies and appraises the planning considerations relevant to the determination of this application. In particular, the Statement will address the following:

- An assessment of the site and surroundings;
- An overview of the site's background and planning history;
- Details of the planning proposal;
- An analysis of the relevant planning policy at a National and Local Level;
- An examination of the local evidence base documents;
- An analysis of the key planning considerations and planning benefits arising from the redevelopment of the site; and
- Conclusions.

CONTENTS OF THE APPLICATION

- 1.6 This Planning Statement provides the overarching background to the proposal and should be read in conjunction with the full set of submitted documents and plans, prepared in support of the application, which together address the relevant matters in detail.

- 1.7 The Statement should be read in conjunction with the other documents submitted as part of the planning application. The following documents are submitted:

- Completed planning application forms, and notices;
- Planning Statement prepared by Rapleys LLP;
- Design and Access Statement, prepared by ECE Architecture;
- Transport Statement, prepared by Transport Planning Practice;
- Preliminary Ecological Appraisal, Phase 1 Habitat Assessment, prepared by The Ecology Co-op;
- Reptile Survey, prepared by The Ecology Co-op;
- Mitigation Statement, prepared by The Ecology Co-op;
- Biodiversity Checklist;
- Phase 1 Geo-Environmental Assessment, prepared by Land Science;
- Noise Assessment, prepared by Anderson Acoustics;
- Arboricultural Letter, prepared by PJC; and

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- Foul and Surface Water Drainage Assessment, prepared by Weetwood.

1.8 The planning application is supported by a suite of planning drawings prepared by ECE Architects including:

- Site Location Plan, ref: 6436 (00) 001E;
- Block Plan, ref: 6436 (00) 100D;
- Site Layout Plan, ref: 6436 (00) 002E;
- Plots 1-3 Plans and Elevations, ref: 6436 (00) 011C;
- Plots 4-6 Plans and Elevations, ref: 6436 (00) 010C;
- Plots 7-10 Plans and Elevations, ref: 6436 (00) 012C;
- Car Barns & Pergola Plans and Elevations, ref: 6436 (00) 013B;
- Street Elevations #1, ref: 6436 (00) 014F;
- Street Elevations #2, ref: 6436 (00) 015F; and
- Street Elevations #3, ref: 6436 (00) 100D.

2 SITE AND SURROUNDINGS

2.1 This section provides a description of the site and surrounding context

THE SITE

2.2 The site is located to the north of Littlehampton town centre. It is situated on the southern side of Toddington Lane (as shown on the site location plan attached at Appendix 1) and extends to approximately 0.36ha.

2.3 The site comprises brownfield land and hard standing, with large areas of dense/continuous scrub on the site's southern and northern ends. There are currently no trees on the site, or located in close proximity to the site boundary. A disused commercial building and open sided metal storage structure located in the centre of the site, and yard were formerly used for agricultural maintenance and storage, but is currently used by a scaffolding business for storage of vehicles and materials.

2.4 A portion of the northern part of the site is owned by West Sussex Highways Agency.

2.5 The site is in a state of disrepair and would benefit from a considerable overhaul in terms of use and maintenance.

2.6 The existing vehicular access from Toddington Lane also serves existing residential dwellings known as Toddington Farm Cottages located adjacent to the site's southern boundary.

2.7 The site is bound by Toddington Lane to the north and east. To the south is a railway line and to the west is the edge of an industrial estate, comprising Gas Car Conversions and Arun Autogas.

2.8 Toddington Farmhouse, to the north-east of the site, is Grade II listed, as is its dovecote.

SURROUNDINGS

2.9 The site is located to the north of Littlehampton the east of Wick. It is characterised by larger areas of residential development and industrial development within a wider rural setting. To the north of the site is a large farm and industrial area. To the east of the site is a small industrial estate bound by open space. To the south of the site on the other side of the railway line is residential development.

3 SITE BACKGROUND AND HISTORY

- 3.1 This section reviews the background and planning history in relation to the Toddington Farm site.

SITE BACKGROUND

- 3.2 The site was formerly used for maintenance and storage; it is currently used by a scaffolding business for storage of vehicles and materials. The site currently comprises brownfield land and hard standing, with a large commercial building and open sided metal storage structures in the centre of the site.

PLANNING HISTORY

- 3.3 A review of the Council's online planning register shows that there have been a number of planning applications in relation to the site since 1987. Two outline planning applications for residential development were refused, albeit nearly 30 years ago:

- Planning application Ref: LU/47/87 for residential development comprising 7 terrace houses, 5 detached houses and garages, 2 semi detached cottages and 10 car parking space, was refused in April 1987.
- Planning application Ref: LU/420/87 was refused in November 1987 for residential development.

- 3.4 Two planning applications (Ref: LU/318/89 and Ref/LU/298/98) sought for the change of use of redundant agricultural buildings to B1 light industrial. Both of these applications were refused in August 1989 and February 1999 respectively.

OTHER NOTABLE SCHEMES

- 3.5 The following schemes are notable and should be considered in the determination of the current planning application. The initial North Littlehampton permission (Ref: LU/47/11) establishes the principle of residential development on the site as it granted outline permission for mixed use development. The second permission concerns the site directly west of the application site known as the Hollyacre site which was permitted in November 2013 (Ref: LU/116/13). This permission confirms acceptability of standalone applications on land holdings located within the North Littlehampton Masterplan area. More details is provided on each of the permissions below:

North Littlehampton (Ref: LU/47/11)

- 3.6 Outline planning permission was granted in January 2013 for a mixed use development at North Littlehampton for the demolition of existing buildings and structures, up to 1,260 residential dwellings (out of a potential 1,460 dwelling masterplan) up to 13,00 sqm of B1 employment floorspace (including 3,000 sqm Enterprise Centre), up to 3,500 sqm of Class A local facilities, a hotel, care home, primary school, community centre, youth and leisure facilities, combined heat and power plant, extension to existing household recycling centre, landscaping replacement and additional allotments, multi-functional green infrastructure, including sports pitches, informal open space, children's play areas, primary vehicular access from a new access from the A259 bridge over the railway line with additional access from Mill Lane and Toddington Lane.
- 3.7 The site is located within the Masterplan area and is well positioned to add to the objectives of the North Littlehampton Strategic Development Area.

Hollyacre Site (Ref: LU/116/13)

- 3.8 Planning permission was granted in November 2013 for the demolition of existing commercial properties and erection of 63 residential dwellings, parking provision, access and landscaping. The Hollyacre Site is being currently built out by Wilmington Homes.

CONCLUSIONS

- 3.9 The site is currently underused as a storage location, it has subsequently fallen into a state of disrepair and is in serious need of redevelopment. Two historic planning applications submitted in 1987 for residential development were refused. However this was a considerably long time ago, within a different policy background and should not be accorded weight when determining the current planning application.
- 3.10 The site is subject to wider outline permission for residential development, and the adjacent Hollyacre site has been granted permission for residential development and is currently being built out. Therefore it is shown that the location is suitable for residential development and the scheme as proposed is appropriate.

4 THE PROPOSAL

- 4.1 The development proposals comprise residential development across the whole site. The planning application seeks full planning permission for the following development:

“Demolition of existing buildings, erection of 10 residential dwellings (Use Class C3) with associated open space, landscaping, parking, and access”

- 4.2 The proposals seek to utilise the local landscape and topography to provide a landscape-led development which revitalises an underutilised site whilst providing much needed housing in a very accessible and sustainable location.
- 4.3 The Design and Access Statement describes the proposals in detail, however the main principles of the development are summarised below.
- 4.4 The application seeks permission for 10 residential units, comprising 4no. 4 bed semi-detached houses, 2no. 3 bed semi-detached houses, 2no. 2Bed semi-detached houses and 2 no. 2 bed flats. It is considered that this residential mix offers an appropriate amount of family sized dwellings for open market sale and reflects the current housing need.
- 4.5 It is proposed to provide 18 car parking spaces for residential use located in car barns, a pergola and allocated spaces. Each house is allocated 2 car parking spaces and each flat is allocated 1 space. 3 additional car parking spaces are provided for use by visitors.
- 4.6 In terms of cycle parking facilities, each house will have 2 cycle parking spaces located within the car barns; each of the flats has allocated parking, with additional spaces for Visitor use.
- 4.7 The proposals intend to retain and enhance the existing vehicular site access from Toddington Lane, which complies with the necessary access and servicing requirements, and utilises a pedestrian priority shared surface. The proposals seek to provide an enhanced level of permeability for the wider area by creating pedestrian and cycle routes throughout the site. Access to and from Toddington Farm Cottages located to the south of the site will remain as existing.
- 4.8 As mentioned, the design of the site has been developed with an emphasis on creating an attractive landscape to enhance the site’s ecology and for use by new and existing residents. The proposals seek to provide considerable landscaping, including significant landscaped buffers on the site’s west, north and east boundaries which will encourage ecological provisions. In addition, the proposals seek to provide a total of 374 sqm of public open space on site, which will be of significant benefit to local residents.

5 PLANNING POLICY

- 5.1 This section examines the planning policy framework against which the redevelopment of the site will be considered.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.3 The relevant planning framework for the consideration of the proposed development is the National Planning Policy Framework and the local development plan which comprises the Saved Policies of the Arun Local Plan (2003) and Littlehampton Neighbourhood Plan (2014). The National Planning Practice Guidance and local guidance also represent material considerations for the proposed development.
- 5.4 In addition, the Council are in the process of developing a new Local Plan. The Arun District Local Plan 2011-2031 and supporting documents were submitted on 30th January 2015 for independent examination to the Secretary of State. The Council are currently considering proposed modifications to the Local Plan and additional evidence base and background documents. The Examination was suspended in January 2016 as the annualised housing requirement of 580 dwellings per annum was challenged during the examination, prompting further work to establish a revised Objectively Assessed Need (OAN) for housing. Examination is due to resume in summer 2017, with adoption anticipated to take place by the end of 2017.

NATIONAL PLANNING POLICY FRAMEWORK

- 5.5 The National Planning Policy Framework (NPPF) adopted March 2012 sets out the Government's planning policies for England and how they are expected to be applied. The NPPF seeks to achieve the overarching principle of sustainable development which should be viewed as a 'Golden Thread' running through both plan-making and decision taking (paragraph 14).
- 5.6 For decision making this means:
- Approving 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 impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole; or
 - Specific policies in the NPPF indicate development should be restricted.

Sustainable Development

- 5.7 Paragraph 6 confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. In these terms, the NPPF taken as a whole constitutes the Government's view of what sustainable development means in practice for the planning system.

Delivering a wide choice of high quality Housing

- 5.8 One of the primary objectives of the NPPF is to significantly boost housing supply. Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development and should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5 year housing supply of deliverable housing sites.

- 5.9 At the heart of this objective is the requirement to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. In seeking to meet these objectives, planning authorities should plan for a mix of housing to meet demographic and market (current and future needs, including first time buyers and families with children (paragraph 50).

Requiring Good Design

- 5.10 The NPPF confirms that good design is indivisible from good planning and sustainable development. Paragraph 57 confirms that it is important for LPA's to plan positively for the achievement of high quality and inclusive design for all development.

- 5.11 Paragraph 58 states that, amongst other things, planning decisions should aim to ensure that developments;

- Function well and add to the overall quality of the area;
- Establish a strong sense of place, using streetscapes and buildings to create attractive places to live;
- Support local facilities and transport networks;
- Respond to local character and reflect the identity of local surroundings and materials;
- Create safe and accessible environments; and
- Be visually attractive as a result of good architecture and appropriate landscaping.

- 5.12 In terms of architecture, variation and innovation is encouraged and planning authorities should not seek to impose preconceived ideas of appropriate design (Paragraph 60).

Promoting Sustainable Transport

- 5.13 Paragraph 29 of the NPPF advises that the transport system should be balanced in favour of schemes that promote sustainable transport modes, to provide people with a choice about how they travel. Development which seeks to encourage and facilitate the use of sustainable modes of transport should therefore be supported.

Promoting Healthy Communities

- 5.14 Paragraph 69 confirms that planning decisions should aim to achieve safe and accessible environments. Local authorities should encourage safe and accessible developments which contain clear and legible pedestrian routes and high quality public space that will encourage their active and continual use.

- 5.15 The NPPF attaches importance to quality open space; paragraph 73 states that access to high quality open spaces can make an important contribution to the health and wellbeing of communities.

Climate Change and Flooding

- 5.16 In terms of climate change and flooding, Paragraph 98 states that when determining planning applications, planning authorities should approve the application if its impacts are acceptable or can be made so.

NATIONAL PLANNING POLICY GUIDANCE

- 5.17 National Planning Policy Guidance Paragraph: 031 Reference ID: 23b-031-20161116 states that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. Of relevance these circumstances are that:

- ‘contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area)’

LOCAL PLANNING POLICY

5.18 The Development Plan for Arun District Council currently comprises:

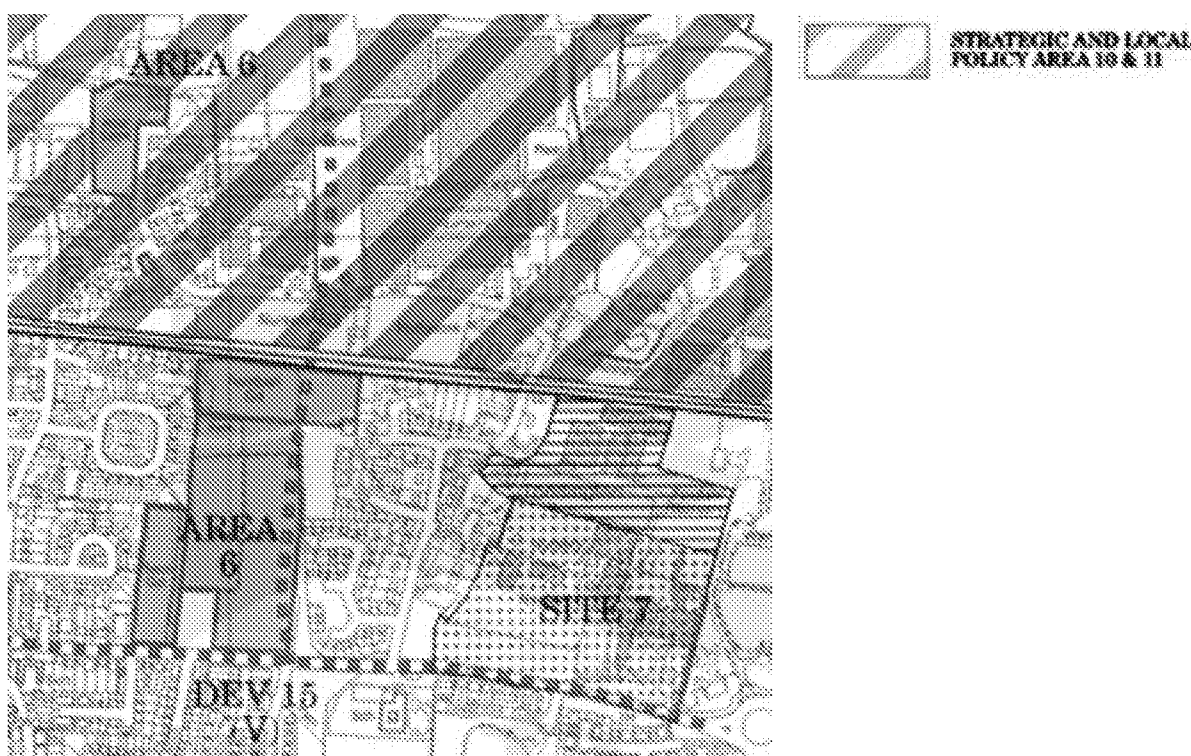
- Saved Policies of the Arun District Local Plan (2003); and
- Littlehampton Neighbourhood Development Plan (2014).

5.19 The Council is at an advanced stage in preparing its new Local Plan, the Arun District Local Plan 2011-2029. Once adopted it will replace the current Arun District Local Plan (2003). Due to the advance stage it should be given weight in decision making.

Allocations

5.20 The Proposals Map adopted in 2003, illustrates the site is located within the Arundel and Littlehampton Strategic Gap (Policy Area 10) and outside the Built up Area Boundary Policy (GEN 2). Figure 2 below illustrates the site allocations set out by the adopted Proposals Map.

FIGURE 2: EXTRACT FROM ADOPTED LOCAL PLAN PROPOSALS MAP (2003)



5.21 However, this policy allocation is now out of date, as the site is confirmed as being within the approved outline scheme at North Littlehampton for residential development. In addition to being allocated for residential development within the emerging Local Plan policy which is at a considerably advanced stage; as well as being located within the Built up Boundary of the Littlehampton Neighbourhood Plan Proposals Map adopted in 2014.

Principle of Development

- 5.22 Saved Policy GEN2 (Built up Area Boundary) confirms that the defined boundary of the built up area for the purposes of the District local Plan is defined on the proposals map. Its main aim is to define the areas within which certain policies will apply. In terms of development outside of the built up area, it seeks to prevent development or redevelopment, unless it is consistent with other Local Plan policies.
- 5.23 The site is located within the Littlehampton and Middleton-on-Sea Strategic Gap. Saved Policy Area 10 (Strategic Gaps) states that development will only be permitted if it is demonstrated to be necessary to meet the requirements of or is consistent with, other policies of the Development Plan; and it would not compromise the objectives of the strategic gap; and attention is given to the long term enhancement of the landscape, amenity and conservation value within the gap, where possible improvement to public access should be sought.
- 5.24 The aim of strategic gaps as defined in the explanatory text is to prevent coalescence and retain the separate identity and amenity of settlements and to protect the undeveloped coastline. Proposals will be subject to rigorous examination of the type of use. Proposed level of activity scale of proposed buildings, impact and reduction of strategic gaps.
- 5.25 Policy 1 of the Littlehampton Neighbourhood Plan states that the Town Council will take a positive approach to the consideration of development, and planning applications which accord with the policies in the Neighbourhood Plan will be approved, unless material considerations indicate otherwise.
- 5.26 This element of the Development Plan is now out of date and as previously set out, has been superseded by the North Littlehampton Outline Permission (Ref: LU/47/11) which seeks to provide 1,260 dwellings, and includes the site within its red line boundary. The site is also allocated for residential development within the adopted Neighbourhood Plan.

Land Use

- 5.27 The Local Plan makes provision for 8,700 new dwellings to be built within the District during the period covered by the Plan (1996 - 2011) within Saved Policy GEN5 (Provision of New Residential Development). At the time of the Plan being adopted the Council had an existing housing supply (1996-2011) of 7,170 units, resulting in a deficit of 1,530 units. The deficit was due to be met by sites in North Bersted/Bognore Regis/Felpham and Toddington.
- 5.28 Saved Policy DEV17 (Affordable Housing) seeks provision within allocated and unidentified housing developments of 25 or more dwellings or residential sites of 0.8 hectares or more, irrespective of the number of dwellings.

Design

- 5.29 Saved Policy GEN7 (The Form of New Development) states that planning permission will only be granted for schemes displaying high quality design and layout; and applicants will be encouraged to improve the site's visual amenity. Of relevance, development will only be permitted if it incorporates the following:
- Efficiently uses land and achieves a density of 30 dwellings per hectare;
 - Respond positively to identified characteristics of the site and area, creating attractive places which focuses on the needs of people;
 - Promotes sustainable development, including travel and energy efficiency;
 - Does not have an unacceptable adverse impact on adjoining occupiers or uses;
 - Allows for the safe movement of vehicles and pedestrians, with priority given to pedestrians;

- Vehicle parking provided in accordance with relevant policy.

5.30 In terms of safety, Saved Policy GEN18 (Crime Prevention) states that planning permission for new residential developments will not be permitted unless the local planning authority is satisfied that the development includes crime prevention measures which are practicable and compatible with achieving a high quality design and layout.

5.31 Policy 22 (Design of New Development) of the Littlehampton Neighbourhood Plan seeks to support proposals for the housing developments provided they respond to the requirements of the adopted West Sussex 'Guidance for parking in new residential Developments SPD. The Neighbourhood Plan encourages all planning applications submitted for major development proposals to be considered by a Littlehampton Design Assessment Panel as part of the pre-application consultations. The Panel will be encouraged to consider emerging proposals and planning applications against the design criteria established in the development plan.

Transport and Highways

5.32 Saved Policy GEN12 (Parking in New Development) states that the Local Planning Authority may seek a lower parking provision than is required by the standards for developments. When considering the extent of the reduced on-site parking provision, the Council will consider environmental and highway safety issues, in addition to the following relevant factors:

- The availability, type and proximity of public parking;
- The availability of alternative means of transport;
- Potential highway safety problems; and
- The scale of development proposed.

5.33 In terms of cycle provision, Policy GEN15 (Cycling and Walking) states that where appropriate, new development will be required to provide safe and attractive facilities for cyclists and pedestrians, both within the site and in the form of links to the surrounding area.

Foul and Surface Water Drainage

5.34 Saved Policy GEN9 (Foul and Surface Water Drainage) states that development which will materially increase foul and/or surface water discharges will be refused unless the Local Planning Authority is satisfied that either adequate drainage capacity exists or appropriate drainage capacity can be provided as part of the development.

Ecology

5.35 In regards to ecology, Saved Policy GEN30 (Protection of Species) prevents development which would adversely affect, directly or indirectly, animal and plant species protected by law. Where development is permitted, the developer will be required to take steps to secure the protection of such animals and plants.

Open Space, Landscape and Visual Impact

5.36 In terms of public open space, Saved Policy GEN20 (Provision of Public Open Space within New Development) states that residential development will be required to provide public open space to the minimum standard of 2.4 hectares per 1000 people and play equipment to meet the needs of the development.

- 5.37 Development which would have an unacceptable adverse impact on individual features or character of the landscape will not be permitted as set out by Saved Policy GEN27 (Landscape Diversity).

Sustainability

- 5.38 The Council will expect all new developments to facilitate energy and water efficiency as set out in Saved Policy GEN24 (Energy and Water Conservation). These elements should be of a design and layout that:

- Minimises heat loss from dwellings;
- Provides maximisation of passive and active solar gain and other renewable energy sources, whilst minimising the exposure of structures to wind and wind driven rain through appropriate landscaping;
- Provides effectively for short term individual and community storage of re-useable and recyclable waste.

Contamination

- 5.39 Saved Policy GEN31 (Contaminated land) states that development on or in close proximity to hazardous sites or contaminated land will be permitted provided the Council is satisfied that appropriate remedial measures can be or have been undertaken.

Noise and Vibration

- 5.40 In terms of noise, Saved Policy GEN32 states noise sensitive development will not be permitted if its users would be affected adversely by noise from existing or proposed noise-generating uses. Development which is a potential source of significant noise pollution will not be permitted unless the Council is satisfied that appropriate measures have been included in the proposal to reduce noise pollution to acceptable levels. Details of such measures will be required as part of the planning application.

EMERGING POLICY

- 5.41 Arun District Council submitted the Submission version of the Local Plan for Examination on 30 January 2015 for independent examination by the Secretary of State. In February 2016, following the Hearing on the Objectively Assessed Needs Hearing, the Inspector provided formal notice of the suspension of the Examination to allow the Council to undertake a programme of work required to make proposed Main Modifications, which will be consulted on and then sent to the Inspector for the examination to continue.

- 5.42 The Main Modifications were reviewed by the Council at Committee on 22 March 2017, and are currently undergoing a six week consultation period (10 April - 30 May 2017). The Inspector will then consider changes and matters raised by the consultation responses. The Council are currently targeting adoption of the new Local Plan by the end of 2017.

Principle of Development

- 5.43 The site is allocated as part of a Strategic Site Allocation. The emerging Policy's of relevance are summarised as follows:

- 5.44 Emerging Policy H SP2 states that sites within the Strategic Site Allocations must be comprehensively planned and should have regard to a masterplan which incorporates high quality imaginative design giving a sense of place and permeable layout. In addition to employing a modern approach to principles of the Garden City movement. The comprehensive development will need to meet the following key requirements:

- a. Integrate appropriately with surrounding communities through an appropriate design;

- b. Ensure a clear and harmonious relationship between town and country including clearly defined boundaries, using physical features that are readily recognisable and likely to be permanent;
- c. Enhance natural environment, landscapes and biodiversity;
- d. Incorporate high quality, well connected green spaces, planting within main streets and biodiversity rich open spaces;
- e. Extend, enhance and reinforce strategic green infrastructure and publicly accessible open space;
- f. New community hubs where required;
- k. Address the off-site capacity requirements that relate to that particular allocation, identified in the Arun Transport Assessment and the local highway network;
- l. Positively respond to sustainable water management;
- m. Maintain and enhance any important features, characteristics and assets of the local area; and
- n. provide for the required infrastructure, that relates to that particular allocation, in accordance with Policy INF SP1 and the Infrastructure Delivery Plan.

Land Use

- 5.45 Emerging Policy H DM1 (Housing Mix) states that the tenure mix for development schemes shall be negotiated on a case by case basis taking into necessary viability considerations into account.
- 5.46 In terms of Affordable Housing, Emerging Policy AH SP2 (Affordable Housing) states that affordable housing will be sought on development sites comprising 11 residential units or more.
- 5.47 Emerging Policy D DM2 (Internal Space Standards) states that the Council will require internal spaces to be of an appropriate size to meet occupants' requirements.

Design

- 5.48 Emerging Policy D DM1 (Aspects of form and design quality) sets out the aspects which the Council will have regard to when considering any application for development, these are: character, appearance/attractiveness, impact, innovation, adaptability, crime prevention, trees and woodland, solar gain, public realm, layout-movement, layout-legibility, public art, density and scale.

Transport and Highways

- 5.49 Emerging Policy T SP1 (Transport and Development) seeks to ensure that development provides safe access on to the highway network; contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle and pedestrian network.

Foul and Surface Drainage Water

- 5.50 Emerging Policy W DM3 (Sustainable urban drainage systems) states that all proposals must incorporate SUDs at an early stage of the design process and these should be located within private areas of the development, it 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 the development, at an early stage of the design process.

5.51 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. These features include:

- Green roofs;
- Permeable driveways and parking;
- Soakaways; and
- Water harvesting and storage features including water butts.

5.52 Proposals for major development must also integrate SUDS within public open spaces and roads, in liaison with West Sussex County Council, (the SUDS Approval Body) or its agent. SUDS must therefore be integrated into the overall design of a development and must:

- a. Contribute positively to the appearance of the area;
- b. Effectively manage water (including its quality);
- c. Accommodate and enhance biodiversity by making connections to existing Green Infrastructure assets;
- d. Provide amenity for local residents (ensuring safe environment); and
- e. Retain existing open drainage ditches in their current form.

Ecology

5.53 Emerging Policy ENV DM5 (Development and Biodiversity) seeks all developments to achieve a net gain in biodiversity and protect existing habitats on site. Where there is evidence of protected species on a proposed development site. Planning applications shall include a detailed survey of the subject species, with details of measures to be incorporated into the development scheme to avoid loss of the species.

5.54 The Council seek to ensure that all development contributes positively to the quality of the environment and ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or on leisure and recreational activities enjoyed by residents and visitors to the District.

Open Space, Landscape and Visual Impact

5.55 Emerging Policy D DM3 (External Space Standards) requires the provision of useable private amenity space, which includes back gardens, roof terraces, balconies and communal gardens in apartment developments. The following standards will be applied as a minimum for all houses:

House Type	Garden area (sq.m)
2-bedroom terraced	50
3-bedroom terraced	65
Small semi or detached	85

Number of bedrooms	Minimum area (sq.m) of private outdoor space
2 bedrooms	5 sq.m

5.56 Emerging Policy HWB SP1 (Health and Wellbeing) states that all development shall be designed to maximise the impact it can make to promoting healthy communities. Development will be encouraged to provide or contribute 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.

5.57 Emerging Policy OSR DM1 (Open space, sport and recreation) states that housing development will be required to contribute towards open space provision in accordance with guidance set out in the current Open Space Study.

Sustainability

5.58 Emerging Policy ECC SP1 (Adapting to climate change) the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change.

5.59 Emerging Policy ECC SP2 (Energy and Climate Change mitigation) states that all new residential and commercial development will be expected to be energy efficient and demonstrate how they will:

- a. Achieve energy efficiency measures that reflect current standards at time of submission;
- b. Use design and layout to promote energy efficiency; and
- c. Incorporate decentralised, renewable and low carbon energy supply systems.

5.60 Emerging Policy WM DM1 (Waste Management) states that new residential development, will be permitted provided that it is designed to allow kerbside collection for municipal waste vehicles, and where appropriate, communal recycling bins and safe bin storage areas are available to residents of flats. Waste management should accord with the West Sussex Waste Local Plan.

Contamination

5.61 Emerging Policy QE DM4 (Contaminated Land) states that the Council will permit, the use of previously developed land and the remediation of contaminated land to ensure that land is brought back into use, subject to a number of requirements. Specifically, the developer shall carry out an adequate investigation to inform a risk assessment to determine a number of specific factor regarding pollutant linkages.

Noise and Vibration

5.62 Noise sensitive development, including residential development, which is likely to experience noise from the road, rail or air must be supported by NEC assessment and designed to ensure that residents will not be adversely affected by noise; and consider both the likely level of exposure at the time of the application and any increase that might be reasonably expected in the foreseeable future, as set out in Emerging Policy QE DM1.

CONCLUSIONS

- 5.63 The adopted Development Plan is aged and policies specific to the site have been superseded by the North Littlehampton Masterplan Area as permitted by outline permission Ref: LU/47/11; in addition to the policies set out in the North Littlehampton Neighbourhood Plan. Subsequently the principle of development is supported in this location. As expected due consideration has been given to the other relevant elements of the Development Plan in the preparation of the proposals.

EVIDENCE BASE DOCUMENTS

- 5.64 The purpose of this section is to analyse relevant evidence base documents.

HOUSING EVIDENCE

- 5.65 The Housing Implementation Strategy has been prepared to support the modifications to the Arun Local Plan housing policies. It clarifies that the latest evidence of objectively assessed housing need (OAN) for Arun District is set out in the Council's latest Housing Needs Evidence (ADCED26) (September 2016). This followed the conclusions of the Local Plan Inspectors in February 2016 (IDED18) where they concluded that the OAN for Arun District in the period 2011 - 2031 was 845 dwellings per annum. Subsequently, the 2014-based Sub-National Population Projections were issued by ONS in May 2016.

- 5.66 The methodology agreed by the Local Plan Inspectors and applies it to the new projections. This resulted in an increase in the assessed housing need to 18,380 homes (919 dwellings per annum) over the plan period.

Annual Monitoring Report (February 2017)

- 5.67 The Annual Monitoring Report found that when using a 'policy off' approach where no Local Plan sites were included within the projected supply and the shortfall was included from 2011-2016; the council had a Housing Land Supply of 1.92 years.

Housing and Economic Land Availability Assessment (HELAA) (November 2016)

- 5.68 The site is considered within the HELAA Report both within designation LU18 (Toddington Lane (Land North of), Various Nurseries) which is the larger outline permission; it is classed as a deliverable site.

- 5.69 The site is also considered again in designation LU18a (Toddington Farm (Land North & West of 1-3 Toddington Farm Cottages). The suitability summary notes that that site is located within an area identified for strategic housing growth and local plan allocation for North Littlehampton (LU18). It neighbours existing development and is located within a fairly sustainable location. It is considered developable; the assessment summary notes that there are no infrastructure constraints.

CONCLUSIONS

- 5.70 The evidence base documents clearly demonstrate that there is a severe shortage of residential land. In addition the site has been confirmed by the LPA as being well located for residential use.

6 PLANNING CONSIDERATIONS

6.1 This section of the Planning Statement sets out the key planning considerations relevant to the determination of the application, informed by the contextual analysis of the Site's surroundings, planning history, neighbouring development and policy review.

6.2 The key planning considerations can be summarised as follows:

- Principle of Development and Land Use;
- Design Quality;
- Transport and Highways;
- Flood Risk and Drainage;
- Ecology;
- Landscape and Visual Impact;
- Sustainability;
- Contamination;
- Noise and Vibration; and
- Overall conformity with the Development Plan.

PRINCIPLE OF DEVELOPMENT AND LAND USE

6.3 The Local Plan policies relative to the site are out of date. The adopted proposals map shows that the site is located outside the built up area boundary and within the Littlehampton and Middleton-on-Sea Strategic Gap. Saved Policy GEN2 seeks to resist development outside of the boundary unless it is in accordance with other Local Plan policies. Saved Policy Area 10 (Strategic Gaps) states that development will only be permitted if it is demonstrated to be necessary to meet the requirements of or is consistent with, other policies of the Development Plan; and it would not compromise the objectives of the strategic gap; and attention is given to the long term enhancement of the landscape, amenity and conservation value within the gap, where possible improvement to public access should be sought.

6.4 However, this element of the Development Plan is now out of date as most recently, the site was allocated for residential development as part of the permitted North Littlehampton Strategic Area Masterplan, which received outline planning permission in January 2013 under Reference LU/47/11, which evidently demonstrates that the site is suitable to be developed for residential use.

6.5 This permission granted consent for up to 1,260 residential dwellings, the application site is well located within the development area and would meet the requirements of the outline planning approval. B8 Investments Property has the opportunity to deliver much needed residential development in this part of Littlehampton. The proposal seeks to utilise currently underused brownfield land to provide 10 residential units, comprising 8 houses and 2 flats with associated parking, access and landscaping.

6.6 Furthermore, the Littlehampton Neighbourhood Plan takes a positive approach to the consideration of development, and states that where planning applications accord with Neighbourhood Plan policies, development will be approved.

6.7 In addition, the Council's evidence base supports the use of the site for residential development. The site is identified within the Council's Housing and Economic Land

Availability Assessment (November 2016) and is designated in both LU18 and LU18a. LU18a (Land North and West of 1-3 Toddington Farm Cottages) states that the site is located within a sustainable location and is considered developable.

- 6.8 Further the scheme will contribute to providing for the identified shortage of residential development in Arun. Saved Policy GEN5 sought to provide 8,700 new dwellings in the period between 1996 and 2011, at the time of the Local Plan's adoption, the Council recorded a deficit of 1,530 units, which was due to be met on sites in North Berstead, Bognor Regis, Felpham and Toddington. The Council did not meet the requirement and as such 18,380 new dwellings is sought to be provided in the emerging Local Plan.
- 6.9 As part of the emerging Local Plan process, the Inspector halted the examination of the Local Plan to allow the Council to reassess their objectively assessed housing need figure, and subsequently increased the figure to 919 dwellings per annum. The proposals will assist in meeting this need.
- 6.10 Furthermore the site is also allocated for development in emerging policy and accords with well-advanced emerging Policy H SP2 which seeks to ensure that Strategic Site Allocations must be comprehensively planned and have regard to a masterplan; as well as incorporating principles of the Garden City movement. As set out previously, the proposals are considered to accord with the principles, providing a sense of place and permeable layout, whilst incorporating key elements of the wider masterplan.
- 6.11 The scheme which is proposed has been carefully designed to reflect existing surrounding development, specifically the Hollyacre site which neighbours the application site to the west. The development also seeks to adhere to the specific principles of the Masterplan. As such, the proposed housing scheme is considered to demonstrate the principles of sustainable development as supported by the NPPF.

DESIGN QUALITY

- 6.12 The NPPF and local planning policy seeks to ensure high quality design in new development of the built environment, good design is cited as a key aspect of sustainable design and indivisible from good planning. The design has subsequently been developed in a considered manner to ensure the proposals are appropriate and positively respond to surrounding context.
- 6.13 The application is supported by a Design and Access Statement and comprehensive set of plans which set out the full details of the proposals and principles of development. In summary the scheme displays a high quality design and layout and vastly improves the site's visual amenity, through developing a currently underutilised and overgrown site and seeking to convert it into a well designed residential use.
- 6.14 The proposed development builds on design principles as set out in the approved masterplan for the North Littlehampton site, and seeks to enhance and compliment the surrounding built environment by utilising design aspects as approved, throughout.
- 6.15 The settlement structure draws on the built environment located in the surrounding area. The proposals seek to efficiently use the land, providing an appropriate level of residential development whilst also retaining enough land to provide landscaping which will benefit future and existing residents. The residential dwellings have been designed to utilise the existing topography and landscaping to ensure that the development does not result in an unacceptable adverse impact on adjoining occupiers. In addition the development promotes sustainability and has been designed to incorporate a good level of travel and energy efficiency, whilst allowing for the safe movement of vehicles and pedestrians and provided the relevant level of parking on site and fully accords with Saved Policy GEN7.

- 6.16 The scheme has also been designed in the interests of crime prevention and measures which are practicable and compatible with high quality design and layout have been included in accordance with Saved Policy GEN18.

TRANSPORT AND HIGHWAYS

- 6.17 In accordance with West Sussex and Arun District Council's policy, the application is supported by a Transport Statement prepared by Transport Planning Practice. The Statement fully appraises the existing transport conditions, and assesses any likely impacts of the proposed development, identifying any mitigation measures required to ensure the proposal is acceptable in planning terms.
- 6.18 There will be 21 car parking spaces, 1 for each flat, 2 for each house and 3 visitor spaces to meet West Sussex County Council's standards and comply with Saved Policy GEN12. A total of 20 cycle parking spaces will be provided which exceeds the local cycle parking standards. Residential cycle parking will comprise lockable storage systems to ensure that they are secure and accords with Saved Policy GEN15.
- 6.19 Access will continue to be provided from the current access point at Toddington Lane, it will be improved to provide enhanced visibility and improve safe access to the highway, in accordance with Emerging Policy T SP1. Pedestrians will have priority and a new footway is proposed along the site's Toddington Lane frontage to provide a safe and attractive route in accordance with Saved Policy GEN15. Deliveries and servicing have also been assessed and it will be possible for vehicles to enter and exit in a forward gear within the site boundary.
- 6.20 In addition, the trip assessment concludes that the proposed development will result in a marginal impact on the local highway network and as such it is considered to be acceptable development.

FLOOD RISK AND DRAINAGE

- 6.21 A key aim of the NPPF is to ensure that flood risk is taken into account at all stages in the planning process and is appropriately addressed, as such Weetwood has prepared the submitted Foul and Surface Water Drainage Assessment in support of the planning application. The Report concludes that Southern Water has confirmed there is capacity within the system to sufficiently remove the peak foul flow rate as estimated, from the site.
- 6.22 In addition the illustrative surface water drainage scheme presented in the submitted Assessment provides SUDs elements to ensure that there will be no increase in peak surface water run off rates and volumes resulting from the proposed development and complies with Saved Policy GEN9. This approach ensures that surface water drainage is incorporated at an early stage of the design process and early stage of the design process and is proposed to be located within private areas of the development in accordance with emerging Policy W DM3.

ECOLOGY

- 6.23 The application is supported by an Ecological Assessment prepare by Ecology Co-op. The Report concludes that the ecological value of the majority of the site is low to moderate. The only suitable habitat on site to support ecology was the ruderal and scrub areas, which were found to be suitable to support populations of reptiles. In addition, records for slow worm and common lizards were identified in very close proximity of the site.
- 6.24 Based on these recommendations a Reptile Survey was undertaken on site by The Ecology Co-op during April 2017, where a low population of slow worms was identified with a peak count of 1 recorded. Due to this result it was noted that a translocation will be necessary.

6.25 The Ecology Co-op also prepared a Mitigation Statement to set out the method and approach to ensure the safe translocation of the site's slow worm population, further to any planning permission being granted on site.

6.26 The submitted Mitigation Statement also details the suitable enhancements which are recommended as being appropriate and proportionate to the site. These include a wildflower area which will be created along the northern site boundary between the low level hedgerow and the top of the bank to enhance the site's ecology levels in accordance with Policy requirements. The proposals will be incorporated in the development proposals and it is considered that the mitigation steps suggested will be adequate to protect and enhance the site's ecology, in accordance with Saved Policy GEN30.

LANDSCAPE, OPEN SPACE AND VISUAL IMPACT

6.27 The submitted Design and Access Statement contains considerable detail regarding the landscape strategy and visual impact of the proposed residential development. Overall, the proposals seek to utilise the site's rural location and associated landscape within the detailed design of the scheme.

6.28 The site benefits from a substantial amount of existing natural screening and topography, which means that the visual impact of any proposed development will be considerably reduced, and is not considered to result in an unacceptable adverse impact on the existing landscape, in accordance with Saved Policy GEN27.

6.29 The landscaping strategy focuses on 3 core areas: site boundaries, public open space and private gardens. The scheme design will encompass substantial soft landscaping through provision of new structural and low level planting areas.

6.30 In terms of open space, the development heavily focuses on providing high quality open space for use by existing and new residents, which accords with adopted and emerging external space policy (Saved Policy GEN20 and Emerging Policies O5R DM1 and D DM3).

6.31 The development has been designed to maximise the impact it can make to promoting healthy communities by incorporating accessible open space and has an emphasis on permeability to encourage pedestrians and cyclists to pass through the site, as walking and cycling routes in accordance with Emerging Policy HWB SP1.

SUSTAINABILITY

6.32 Saved Policy GEN24 sets out the measure that it will expect new development to follow in order to facilitate energy and water efficiency, and ensure that the site is sustainable. The proposals seek to deliver in accordance with current Building Regulations and minimise heat loss. Furthermore all units will undergo a full SAP assessment to ensure energy efficiency within the building envelope. The site has been designed to orientate the buildings and internal layout to maximise the potential for natural daylight and solar gain, with natural ventilation provided to all rooms. These measures also seek to comply with Emerging Policy's ECC SP1 and ECC SP2.

6.33 Storage of re-useable and recyclable waste is provided in wheelie bins due to the size of the site. These will be kept within the back gardens of each dwelling and apartment, to be brought to a designated point within the cul-de-sac on collection days only, to comply with Saved Policy GEN24, West Sussex Waste Local Plan and Emerging Policy WM DM1. The development will also have the necessary dropped kerb.

CONTAMINATION

- 6.34 A Phase 1 Geo-Environmental Assessment has been prepared by Land Science and is submitted in support of the proposals, which should be considered in detail when determining the application.
- 6.35 In summary, the report concludes that the overall level of risk ranged between Moderate and Very High. Consequently a Very High level of risk has been assigned to the site in respect of the proposed development. The report makes a series of recommendations in regards to next steps and the Phase 2 Assessment, in order to inform the appropriate remedial measures which will be taken to ensure the site is safe and accords with Saved Policy GEN31 and Emerging Policy QE DM4.

NOISE AND VIBRATION ASSESSMENT

- 6.36 The submission is supported by a Noise and Vibration Assessment prepared by Anderson Acoustics. The Report concludes that the attended and unattended noise surveys carried out and advice provided and incorporated in the design of the proposed building envelope ensures that internal noise levels inside habitable rooms lie within the required guideline limits.
- 6.37 In addition an unattended vibration survey has also been carried out and calculations show that any potential vibration from train movements would not exceed the range of “low probability of adverse comment” as required by national guidelines. Therefore the proposals would not be negatively affected by adverse noise impacts.
- 6.38 Therefore the report concludes that residential development in this location would not be adversely affected by noise from existing or proposed noise-generating uses and accords with Saved Policy GEN32 and Emerging Policy QE DM1.

CONCLUSIONS

- 6.39 The above analysis demonstrates that the proposal is acceptable in planning terms and conforms to the relevant provisions of the Development Plan and emerging policy. The site has been allocated as part of the Masterplan for residential development within the Littlehampton Strategic Area Masterplan; and as such the residential development proposed is wholly appropriate to the site whilst also providing much needed public open space for new and existing residents. As such the proposals should receive full support of the Local Authority from a policy basis.

7.1 It is considered that the proposal accords with the NPPF (not least due to its sustainable credentials), the Council's Local Plan, Neighbourhood Plan, and the Council's emerging Local Plan. It constitutes appropriate development, for the following principal reasons:

- The site is allocated for residential development within the Littlehampton Strategic Area Masterplan; and as such the proposal is wholly appropriate for the site and should receive full support from the Council.
- The scheme seeks to provide much needed housing that is reflective of evolving market demand, and will help to meet the Council's serious shortfall in housing supply.
- The proposed development responds in a sensitive manner to its context and surroundings, and promotes a layout, scale and design which seeks to maximise site opportunities as required by the NPPF.
- The site represents a sustainable location for housing development and the development will enable the regeneration of an underutilised brownfield asset that has remained vacant over the long term.
- The current scheme proposals is the result of a lengthy process to design a considered landscape led approach, which provides a considerable amount of attractive open space for use by existing and new residents. The site has been designed to be permeable with cycle and pedestrian routes to ensure the site is well connected with neighbouring Hollyacre site and wider North Littlehampton Strategic Area.
- Maximum protection of residential amenity has been sought through utilising the site's natural topography to create a sensitive and welcoming environment in which to live.

This Statement and the accompanying submission documents confirm that the proposals are acceptable, in principle, from a planning perspective and that permission should be granted following submission of the outline application.

APPENDIX 1 - SITE LOCATION PLAN

Accommodation Schedule

Plot 1	3-Bedroom House	c. 94sqm
Plot 2	2-Bedroom House	c. 79sqm
Plot 3	2-Bedroom House	c. 79sqm
Plot 4	2-Bedroom Flat	c. 64sqm
Plot 5	2-Bedroom Flat	c. 69sqm
Plot 6	3-Bedroom House	c. 93sqm
Plot 7	4-Bedroom Townhouse	c. 117sqm
Plot 8	4-Bedroom Townhouse	c. 117sqm
Plot 9	4-Bedroom Townhouse	c. 117sqm
Plot 10	4-Bedroom Townhouse	c. 117sqm

Total 10no. Dwellings

Car Parking 1 space per Flat
2 spaces per House
Visitor Parking at 0.3 spaces per dwelling

Cycle Parking 2 spaces per dwelling in car barns and
Sheffield stands



Public Open Space 118sqm

11 steps @ 151.8mm rise, 400mm going

Public Open Space 256sqm

11 steps @ 159.1mm rise, 400mm going

Open Car Barns to Plots 1-3 and 9-10

Red Line indicates edge of road - 1.5m wide footpath suggested around northern site boundary with bank retained as required

Open car barns to Plots 6-8

2m wide landscaped buffer to western boundary taking account of slope of site

Pergola over parking spaces

Sheffield stand

Low level (0.6m) planting to access road entrance

Pedestrian priority shared surface access road finished in block paving

Access maintained to and from Toddington Cottages

Client's Name
Greg Blurton

Drawing Title
Site Layout
Proposed

Job Title
Land at Toddington Lane,
Toddington

Scale
1:500 @ A3

Drawn	Checked	Date
SM	AK	20.01.17
Job No	Drawing No	Rev
6436	(00) 002	D

APPROVAL

Rev	Date	Revision Details	Dr	Ch
D	18.04.17	Updated for Planning	SM	AK
C	13.02.17	Planning Submission	PA	AK
B	13.02.17	Issued for Planning	SM	AK
A	20.01.17	Draft site plan issued for comments	SM	AK

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