

Planning Statement

**Proposed remodelling of golf practice ground and surrounding land,
including tees (incorporating importation of material) on land at
Littlehampton Golf Course, Rope Walk, Littlehampton**

Prepared for

Littlehampton Golf Club and Matthews (Sussex) Ltd

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1. INTRODUCTION

- 1.1. This Planning Statement is in support of a full planning application for the proposed remodelling of a golf practice ground and surrounding land, including tees (incorporating importation of material) on land at Littlehampton Golf Club, Rope Walk, Littlehampton.
- 1.2. Littlehampton Golf Club was founded in 1889, and is the only links course in West Sussex. It comprises an 18-hole par 70 course. It is located immediately to the west of the River Arun and Rope Walk, and north of West Beach. Within the south-eastern area of the course is a flat, grassed area used as a golf practice range.
- 1.3. This application envisages the remodelling of the practice range, via the importation of material to create a landform, akin to the sand dunes which lie to the south, adjacent to West Beach. This will provide a more practical and useable practice ground area, increasing its attractiveness to users of the Golf Course. The proposal is discrete from the application for works to the bund, submitted to the Local Planning Authority in June 2017 (LPA reference LU/208/17).
- 1.4. The application is supported by a range of documentation, comprising the following:
 - Drawing 260-08-020 - Site Location Plan;
 - Drawing 820-01 - Existing Block Plan;
 - Drawing 820-02 - Proposed Block Plan;
 - Drawing 820-03 - Proposed Cross Sections;
 - Drawing 820-04 - Proposed Isopachyte Plan;
 - Preliminary Ecological Appraisal - June 2017 - Prepared by Environmental Business Solutions;
 - Flood Risk Assessment (May 2017) and Flood Risk Appraisal Addendum Note (August 2017) - Prepared by Motion Consultants;
 - Highways Technical Note - August 2017 - Prepared by Motion Consultants; and
 - Design & Access Statement.
- 1.5. This Statement details the site and its surroundings, sets out relevant planning history, planning policy, and assesses the scheme in accordance with the requirements of the Development Plan and other material considerations, including the National Planning Policy Framework.

2. SITE AND SURROUNDINGS

- 2.1. Littlehampton Golf Club is located immediately to the west of Littlehampton. It is on the west side of the River Arun which runs in a broadly north-south direction, flowing into the sea a short way to the south of the application site.

- 2.2. The Golf Club site is accessed from the northwest, from the A259, initially via Ferry Road which runs broadly east, and then via Rope Walk which runs broadly south, parallel to the River Arun. This roadway defines the eastern boundary of the Golf Course and terminates a short way to the southeast, at a car park with cafe and toilets serving West Beach, which runs westerly from the car park toward Middleton-on-Sea.
- 2.3. On the east side of Rope Walk (and immediately west of the River Arun) are a series of water related land uses, including marina and boatyard.
- 2.4. The Golf Clubhouse and associated parking facilities are located toward the northern end of the Golf Course. South of this is the course's first tee. This is a 420 yard par 4 hole which runs due south. Immediately to the south of the first green are the tees for the second hole. This is a 366 yard par 4 which runs west, parallel to West Beach.
- 2.5. To the west of the first fairway, and north of the second fairway is a broadly rectangular area of flat grassland that is edged to the north, south and west by modestly rising land covered in scrub. This comprises a golf practice ground. It is bordered to the west by the third hole, and to the north by the 17th green, and 18th tee.
- 2.6. The tee position for the practice range is located immediately to the east of the first fairway, and west of Rope Walk. This means golf balls are hit perpendicular to, and across, the first fairway.
- 2.7. The practice range, is set at some 1.5m AOD. To the south, the second fairway is set at some 4.5m AOD, and beyond this, land rises on to the series of sand dunes at the back of West Beach. To the east, Rope Walk is set higher than the Golf Course at some 4.5m AOD; to the north, land rises to some 2.0 - 2.5m AOD; and to the west, land rises to some 3.0m AOD.
- 2.8. Immediately south of tees for the second hole are the remnant remains of a 19th century artillery fort known as Littlehampton Fort, which is currently undergoing restoration.

3. PLANNING HISTORY

- 3.1. There are numerous planning applications that relate to the Littlehampton Golf Club site. These include the following:
 - **LU/79/60** - Construction of a shop for the club professional - Approved 13/05/1960.
 - **LU/61/62** - High voltage overhead line - Refused 30/03/1962.
 - **LU/298/68** - Construction of bay window - Approved 15/11/1968.
 - **LU/177/71** - Two timber and corrugated iron shelters - Approved 14/06/1971.
 - **LU/150/72** - Club house and implement shed - Approved 16/05/1972.
 - **LU/32/73** - Improvements and alterations - Approved 12/03/1973.
 - **LU/11/86** - New three storey clubhouse to replace existing structure - Approved 12/02/1986.

- **LU/74/88** - Extension to golf professionals shop - Approved 18/04/1988.
- **LU/221/89** - Conversion of existing roof space into a snooker room and the provision of an external escape stair - Approved 19/06/1989.
- **LU/315/92** - Single storey extension to form additional store - Approved 01/03/1993.
- **LU/68/94** - New professionals shop and store and minor additions to SE corner of existing clubhouse - Approved 18/05/1994.
- **LU/29/02** - Extension to existing implement store - Approved 20/03/2002.
- **LU/223/04** - New secure entrance gates - Withdrawn.
- **LU/335/04** - New secure entrance grates. (Re-submission following LU/223/04) - Approved 10/09/2004.
- More recently, in June 2017, a planning application was submitted for the proposed increase in height and length of bund and associated landscape enhancement works (incorporating importation of material). This was validated by the LPA in July 2017 under reference number **LU/208/17/PL**. This application proposal was prepared and submitted in response to the concerns expressed by the District Council at the risk of mishit and hooked tee shots being driven, from the first tee and fairway, over the eastern perimeter fence towards adjacent land, beyond Rope Walk. This application was granted conditional planning permission on 07th September 2017.

4. PLANNING POLICY

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Material considerations include the National Planning Policy Framework and National Planning Practice Guidance.
- 4.2. The approved Development Plan, in relation to this application, for the purposes of the Act, comprises the saved policies of the Arun Local Plan (ALP), and the 'Made' Littlehampton Neighbourhood Plan (LNP).

5. NATIONAL PLANNING POLICY FRAMEWORK

- 5.1. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, made up of the three dimensions of economic, social and environmental, which are mutually dependant (paragraph 6-8).
- 5.2. Paragraph 14 states that 'At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking ... [and that] ... For decision-taking, 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 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.'

5.3. Paragraph 17 sets out twelve core land use planning principles that underpin both plan-making and decision-taking. These include that planning should:

- Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the 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. It notes every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth;
- Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- Take account of the different roles and character of different areas, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; and
- Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

5.4. Section 3 sets out support for a prosperous rural economy. Paragraph 28 notes that planning should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. It notes that to promote a strong rural economy, Local and Neighbourhood Plans should:

- Support the sustainable growth and expansion of all types of business and enterprise in rural areas ... ;
- Promote the development and diversification of agricultural and other land based rural businesses; and
- Support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors and which respect the character of the countryside. It notes that this should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.

- 5.5. Section 8 sets out how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.
- 5.6. Paragraph 70 states 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 community facilities (including sports venues) and other local services to enhance the sustainability of communities and residential environments.
- 5.7. Paragraph 73 states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- 5.8. Section 10 focusses on meeting the challenge of climate change, flooding and coastal change. Paragraph 94 states Local Planning Authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of matters such as flood risk and coastal change.
- 5.9. Paragraph 99 states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.
- 5.10. Paragraph 100 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 5.11. Paragraph 103 states that when determining planning applications, Local Planning Authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific Flood Risk Assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:
- Within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
 - Development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.
- 5.12. Section 11 sets out a requirement for the planning system to contribute to and enhance the natural and local environment, including by minimising impacts on biodiversity and providing net gains in biodiversity where possible.
- 5.13. Section 12 sets out the Government's commitment to conserve and enhance the historic environment.
- 5.14. Paragraph 128 notes that in determining applications, Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 5.15. Paragraph 131 notes that in determining planning applications, Local Planning Authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 5.16. Paragraph 132 notes that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. It notes that as heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.
- 5.17. Paragraph 133 notes that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, Local Planning Authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss or a number of criteria apply.
- 5.18. Paragraph 134 notes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 5.19. Paragraph 186 states that Local Planning Authorities should approach decision-taking in a positive way to foster the delivery of sustainable development.
- 5.20. Paragraph 187 states that Local Planning Authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local Planning Authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

6. ARUN LOCAL PLAN 2003

- 6.1. The current Development Plan for the district comprises the saved policies of the Arun Local Plan (ALP). It was adopted on 17th April 2003 and was initially intended to cover the period up to 2011. The following policies are relevant to the determination of this application.
- 6.2. Policy GEN2 states that outside the built-up area, development or redevelopment will not be permitted unless it is consistent with other Local Plan policies.
- 6.3. Policy GEN3 states that outside the built-up area, the countryside will be safeguarded for its own sake. Development will not be permitted unless it is for, amongst other things, (GEN3 (ii)) quiet, informal recreation.

- 6.4. Policy GEN7 states that planning permission will only be granted for schemes displaying high quality design and layout. It requires, amongst other things, that development proposals must (GEN7 (ii)) respect and enhance local distinctiveness; and (GEN7 (iv)) not have an unacceptable adverse impact on adjoining occupiers, land, uses, or property.
- 6.5. Policy GEN10 states that planning permission will be refused for development which would be at an unacceptable risk of tidal flooding and/or where proposals are detrimental to the integrity of tidal defences or the ability to maintain or improve them.
- 6.6. Policy GEN11 states that planning permission for development which would be at risk from flooding and/or materially decrease the capacity of a floodplain to store or pass flows of floodwater, will be refused, unless the Local Planning Authority is satisfied that compensatory flood storage/waterway areas can be provided as part of the development and the function and effectiveness of existing watercourses, or their replacements, are not adversely affected.
- 6.7. Policy Area 1 states that within Areas of Special Character planning permission will be granted subject to (i) the retention of features which make a special contribution to the character of the area; (ii) the maintenance of an appropriate mix of uses where this is an important element in the character of an area, and the development makes a positive contribution to the special character of these areas.
- 6.8. Policy Area 5 states that the Local Planning Authority will protect, amongst other things, outdoor sports facilities from development, other than associated recreational development.
- 6.9. Policy Area 10 states that Strategic Gaps, as identified on the Proposals Map, will be maintained and protected between amongst others (Area 10 (iii)) Littlehampton and Middleton-on-Sea. It states proposals for development within a Strategic Gap will be subject to the most rigorous examination, and 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;
 - It would not compromise, either individually or cumulatively, the objectives and fundamental integrity of the Strategic Gap; and
 - Attention is given to the long term enhancement of the landscape, amenity and conservation value within the Gap and, where possible, to the improvement of public access.
- 6.10. Policy Area 15 states that proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Nature Reserve, Site of Nature Conservation Importance or Regionally Important Geological/Geomorphological Site will not be permitted unless it can be demonstrated that reasons for the proposal outweigh the need to safeguard the nature conservation value of the site/feature. It notes that where development is permitted which would damage the nature conservation value of the site/feature, such damage should be kept to a minimum. It also notes that conditions or planning obligations will be used to secure necessary compensatory or mitigation measures, enhancement and site management.

- 6.11. Policy Area 16 states that there will be a presumption in favour of the preservation of scheduled and other nationally important monuments and archaeological remains. Development which adversely effects their sites or settings will not be permitted.

7. LITTLEHAMPTON NEIGHBOURHOOD PLAN

- 7.1. The Littlehampton Neighbourhood Plan (LNP) was made by Arun District Council on 5th November 2014 and forms part of the Development Plan for the area.

- 7.2. It sets out a Vision for the area up to 2029 and includes a series of objectives and measures reflecting the top priorities of the Plan. These include:

1. *'To contribute to meeting the demand for new employment opportunities and specifically to encourage local small business and tourism ventures to grow; and*
2. *To consolidate and improve local community service and facilities.'*

- 7.3. Policy 1 states that planning applications which accord with the policies in the Neighbourhood Plan will be approved unless material considerations indicate otherwise. It states that Littlehampton Town Council will take a positive approach to its consideration of development. The Town Council and Local Planning Authority will seek to work with applicants and other stakeholders to encourage the formulation of development proposals that can be approved.

- 7.4. Policy 5 states that the Neighbourhood Plan will support proposals in the West Bank area to alleviate flood risk, subject to compliance with a number of criteria.

- 7.5. Policy 21 states that the Neighbourhood Plan supports the implementation of any scheme that maximises the use of the river; encourages tourism activity along the waterway and provides connections between Littlehampton and the South Downs National Park and other points of interest in West Sussex.

8. EMERGING ARUN LOCAL PLAN

- 8.1. The emerging Arun Local Plan (eALP) 2011-2031 and supporting documents were submitted for independent examination to the Secretary of State in 30 January 2015.

- 8.2. The examination of the eALP was formally suspended in February 2016 following a Procedural Meeting and initial Hearing sessions. This was to enable the Council to undertake further work and produce modifications to the Plan in response to a range of observations and concerns identified by the Planning Inspector.

- 8.3. Consultation on these Proposed Main Modifications took place from 10th April 2017 until 30th May 2017. The Examination of the emerging Local Plan has been reconvened, and a new Inspector has been appointed. Hearings into the Plan are due to commence on 19th September 2017.

- 8.4. The Plan sets out a vision for the future of Arun up to 2031. It sets the planning framework for the district and covers Arun district excluding land within the South Downs National Park Authority.

- 8.5. The 'Arun Local Plan 2011-2031 Publication Version showing Modifications' includes the following policies which are of relevance in the determination of this application.
- 8.6. Policy SD SP1 sets out how the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.
- 8.7. Policy SD SP1a sets out the overall spatial strategy for the plan area. This includes (f) providing for development in the countryside area which reflects its character and role.
- 8.8. Policy CSP1 states that outside the built-up area the countryside will be protected for its own sake, and development will not be permitted unless it is for, amongst other things (d) diversification of the rural economy; and (f) in accordance with other policies in the plan which refer to a specific use or type of development.
- 8.9. Policy SD SP3 relates to gaps between settlements, including between Littlehampton and Middleton-on-Sea. It notes that development will only be permitted within the Gaps if:
- It would not undermine the physical and/or visual separation of settlements;
 - It would not compromise the integrity of the Gap, either individually or cumulatively with other existing proposed developments;
 - It cannot be located elsewhere;
 - It maintains the character of the undeveloped coast; and
 - It enhances the green infrastructure functions of the Gap and takes account of opportunities identified in The Green Infrastructure Study 2012.
- 8.10. Policy TOU SP1 notes that proposals for visitor related development will be determined by Arun's capacity to absorb such growth. It sets out that this means tourism growth which: encourages long-term visitor interest/activity; ensures a viable visitor economy; provides benefit to local people; extends the visitor season; and protects and enhances the natural and built environment of Arun.
- 8.11. Policy TOU DM1 notes that visitor related tourism development can play an important role in rural diversification. It notes it is necessary to balance the provision of facilities against the need to safeguard the landscape, character and environment of the district and green infrastructure sites including alongside the coast. It notes that when assessing proposals for visitor attractions outside the built-up area, these will generally be expected to be small-scale and relate to quiet, informal recreation and enjoyment of Arun's countryside. It notes there may however be circumstances where larger scale facilities may be appropriate where they are associated with enhancing visitor use or appreciation of a specific feature or location. It notes that all cases of development in the countryside will be required to demonstrate that it is required and is compatible with its countryside location and is sensitively designed to minimise potential impact on the countryside.
- 8.12. Policy DSP1 requires all development proposals to be of a good quality and demonstrate a high standard of design.

- 8.13. Policy OSR DM1 sets out a commitment to protect existing open space, outdoor sport, community and recreation facilities.
- 8.14. Policy HER SP1 states that the Local Planning Authority will grant permission for development proposals that conserve or enhance the historic environment of the district. Conversely development likely to prejudice such assets, including their settings will be refused.
- 8.15. Policy HER DM6 states that there will be a presumption in favour of the preservation of scheduled and other nationally important monuments and archaeological remains.
- 8.16. Policy ENV SP1 states that the District Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment. The subtext of the policy notes that the Golf Course is identified as a Site of Nature Conservation Importance.
- 8.17. Policy ENV DM1 states that proposed development likely to have an adverse effect on land benefitting from such a biodiversity designation will not normally be permitted. It notes that exceptions will be made where the following can be demonstrated:
- There is no alternative solution (which shall be adequately demonstrated);
 - There are reasons of public health or public safety;
 - There are benefits of primary importance to the environment; or
 - There are imperative reasons of overriding public interest.
- 8.18. Policy ENV DM5 states that development schemes shall seek to achieve a net gain in biodiversity and protect existing habitats onsite. It notes that where there is evidence of a 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.
- 8.19. Policy WDM2 states that development in areas at risk of flooding will only be permitted where a number of criteria are met. This includes that a site specific Flood Risk Assessment demonstrates the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.
- 8.20. Policy QE SP1 requires that all development contributes positively to the quality of the environment and ensure the development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the district.
- 8.21. Policy HWB SP1 states that all development shall be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities. It further notes that where new health, recreation and leisure facilities area planned, these shall be located along public transport corridors that are easily accessible to members of the wider community.

9. THE SETTING OF HERITAGE ASSETS

- 9.1. Historic England have produced a Good Practice Note on the assessment of the setting of heritage assets (March 2015). It notes in paragraph 4 that the NPPF makes clear that:

'The setting of a heritage asset is the surroundings in which the asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate their significance or may be neutral.'

- 9.2. Paragraph 5 of the document notes that the contribution of setting to the significance of a heritage asset is often expressed by reference to views.
- 9.3. Paragraphs 10-12 advocate a five-step process which comprises identifying which heritage assets and their settings are affected (step 1); assess whether, how and to what degree, the setting makes a contribution to the significance of the heritage asset (step 2); assess the effects of the proposed development, whether beneficial or harmful on the significance (step 3); explore the ways to maximise enhancement and avoid or minimise harm (step 4); and make and document the decision and monitor outcomes (step 5).
- 9.4. Step 2 requires an assessment of whether the setting of the heritage asset makes a contribution to its significance and the extent and/or nature of that contribution. It should comprise an understanding of the key attributes of the heritage asset and then consider the physical surroundings of the asset, including its relationship with other heritage assets, the way the asset is appreciated, and the assets associations and patterns of use.
- 9.5. Step 3 requires identification of the range of effects the development may have on setting and evaluate the results and degree of harm or benefit to the significance of the heritage assets. It notes the assessment should address the key attributes in terms of its locational siting; formal appearance; additional effects; and permanence.

10. PROPOSED DEVELOPMENT

- 10.1. The application site is part of Littlehampton Golf Course. It comprises an existing practice ground area, bordered to all sides by tees, greens and fairways. It is a broadly rectangular area of flat grassland, edged to the north, south and west by modestly rising land, covered in scrub. The practice tee position is located in a pocket of land immediately east of the first fairway and west of Rope Walk. From here balls are struck in a westerly direction towards the practice ground.
- 10.2. The area is low lying, in relation to land to the north, south and west, and has poor drainage at times of inclement weather. This together with the surrounding scrub, renders the practice ground of limited use.
- 10.3. The application envisages the remodelling of the area. This would include the importation of material to create a re-profiled area that gently rises in a westerly direction. It would then fall more steeply to the rear (west) as well as to the north and south.

- 10.4. The existing practice ground is some 1.5m AOD. It is bordered to the north by land which increases to some 2.5m AOD; to the west by land that rises to some 3.0m AOD; and to the south by land that rises to some 4.5m AOD.
- 10.5. The re-profiled land increases in height in a westerly direction, to a maximum of some 7 - 7.5m AOD. The change in ground levels at any given point would be a maximum of some 5m. The area would appear as sand dunes in profile and character. This reflects the series of sand dunes to the south of the second fairway, and immediately to the rear of West Beach.
- 10.6. In conjunction with this work, it is also proposed to re-profile the third fairway (immediately to the west of the practice ground), with a modestly repositioned tee. Similarly, the tee position for the 18th fairway (which heads in a northerly direction) would be re-profiled and raised. It is proposed that the area around the practice ground would be re-landscaped with a coastal area wildflower seed mix, together with native shrub specimen species, which would include hawthorn, blackthorn, pussy willow, common elder and gorse.
- 10.7. The proposed works would necessitate the importation of material from offsite. It is estimated that this would amount to some 45,000 cubic metres. This would be delivered in some 3,750 vehicle loads, based on a carrying capacity of each vehicle of some 12 cubic metres. It is estimated the works would take six months to be completed, equating to a maximum average of 29 daily load deliveries. This would equate to some 3-4 movements per hour.
- 10.8. It is proposed the works would be implemented during the 'low' season, in terms of both usage of the Golf Course and uses of the adjacent Rope Walk and West Beach. This would be between 1st October - 31st March. Delivery vehicles would travel along the A259, then Ferry Road, and then Rope Walk, before accessing the application site via the existing works entrance a short way to the northeast of the practice ground area. This would necessitate modest alterations to the existing access way, to enable delivery and deposition of material.
- 10.9. During the implementation of the works, it is proposed to seek agreement to temporarily suspend some of the parallel parking bays within Rope Walk, within the vicinity of the Golf Club. This will facilitate the introduction of a temporary passing bay to provide opportunities for the delivery vehicles and other roadway users to pass safely. It is expected the traffic along Rope Walk will be highest at the proposed passing bay, due to the traffic associated with the Golf Club and is therefore at the optimum location. Temporary suspension of the parking bays and implementation of the temporary passing bay will be undertaken in liaison with the District Council who are in control of parking along Rope Walk.

11. CONSIDERATIONS

- 11.1. In the assessment of this application, it is considered that the main issues are:
 - Principle of Development;
 - Landscape Character;
 - Ecology;

- Flood Risk;
- Transport;
- Heritage Assets; and
- Whether the Scheme represents Sustainable Development.

11.2. Each are now considered in turn.

12. PRINCIPLE OF DEVELOPMENT

- 12.1. The application site is located a short way beyond the built-up area boundary of Littlehampton, within a countryside location for the purposes of applying planning policy. It is also within the defined Strategic Gap between Littlehampton and Middleton-on-Sea.
- 12.2. The application site comprises a practice ground that is part of an existing longstanding Golf Course. All tiers of planning policy support the provision and retention of leisure and recreation facilities to support the health and wellbeing of the resident community and visitors.
- 12.3. The proposal envisages the remodelling and improvement of the existing practice ground to facilitate an improvement in its practical use and attractiveness for visitors of the Golf Club. At present the practice ground is a flat low lying grassland which has poor porosity at times of inclement weather, and is surrounded by scrubland. The proposal envisages re-profiling the practice ground so that it increases in height in a westerly direction facilitating an improved and usable area.
- 12.4. The works will enhance the attractiveness of the practice ground, and will improve and increase the times it can be used. This will be to the benefit of visitors of the Golf Club. The provision of suitable practice facilities is important both to existing users of the Golf Club, and as a method of attracting new entry level golfers.
- 12.5. Improvement of the facilities will thus have wider spinoff benefits in the attractiveness and vibrancy of the wider Golf Course.
- 12.6. Having regard to the benefits of the scheme in supporting the leisure and recreation facilities of the Golf Course, it is considered that the works are wholly in accordance with planning policy which seek to support leisure and recreation facilities, including in countryside locations. This is set out in Section 3 and 8 of the NPPF, Policy GEN3 of the ALP, and Policy SD SP1a, CSP1 and TOU DM1 of the eALP.
- 12.7. On this basis, it is submitted that the proposed works to improve and remodel the practice ground is acceptable in principle.

13. LANDSCAPE CHARACTER

- 13.1. Littlehampton Golf Club is a 'links' course, reflecting its setting immediately adjacent to the sand dunes and shoreline to the south. In keeping with this location and character, the course is generally open and exposed with very few trees. It is broadly flat, with undulations reflecting the dune character of land to the south. There are pockets of low lying shrub planting around the practice ground and alongside the holes, particularly dominated by gorse.
- 13.2. The course represents the 'green' edge of the western side of Littlehampton with open agricultural farmland to the west providing separation between Littlehampton and Middleton-on-Sea.
- 13.3. The application envisages the remodelling of the practice ground. It is currently low lying with land around it to the north, south and west at higher level. The scheme would increase the ground level of the practice ground in an east to westerly direction. This would be a gradual incline, with the sides and rear of the practice ground falling away more steeply to create a convex land profile. The remodelled land would be at its highest at the central, rear part of the practice ground. At this point the land would be a maximum of some 7.5m AOD. The land would then fall away to the north, south and west to existing ground levels which are circa 3m AOD to the north and west, and 4.5m to the south.
- 13.4. The landform would be reflective of, and in keeping with, the character of the surrounding area, both the Golf Course, and the sand dune system that lies immediately to the south of the course, along the rear of West Beach.
- 13.5. The application site, Golf Course and wider area fall within the defined Strategic Gap between Littlehampton and Middleton-on-Sea. Within this area, Policy Area 10 of the Local Plan states that applications will be subject to the most rigorous examination. It requires schemes to comply with a number of criteria including that it does not compromise either individually or cumulatively the objectives and fundamental integrity of the Gap.
- 13.6. The proposed works relate to a modest area of the Golf Course. It will create a revised landform that is in keeping with the surrounding character, both of the Golf Course, and the dune system bordering it to the south. It will not either individually nor cumulatively, conflict with the objectives or integrity of the Gap. It will facilitate and enhance the use of the practice area as an integral part of the Golf Course facilities, preserving its amenity value and facilitating public access to this part of the Gap.
- 13.7. It is submitted that the application is in accordance with the Strategic Gap policy requirements as set out in Policy Area 1 and Policy Area 10 of the ALP and Policy SD SP3 of the eALP.

14. ECOLOGY

- 14.1. The application is supported by a Preliminary Ecological Appraisal undertaken by Environmental Business Solutions. This sets out the results of a desk-study and data-search including obtaining the records of Sussex Biodiversity Records Centre, together with a survey.

- 14.2. This notes that the site forms part of the Littlehampton Golf Course and Atherington Beach Local Wildlife Site, and furthermore is close to the Climping Beach SSSI, the West Beach Local Nature Reserve; and the Climping sand dune system Local Geological Site.
- 14.3. The report notes the majority of the site consists of amenity grassland which is closely mown. Along the north, south and western boundaries is scrub that is dominated by gorse, hawthorn, and ground ivy, with occasional nettle. There is also a small group of scrubby goat willow trees in the north-west corner of the site.
- 14.4. The report notes there are no large mature trees or buildings within the site or adjacent to it that would indicate the presence of bats; no signs of badger activity or setts; potential for low numbers of shrub nesting bird species; no ponds within proximity to indicate the probability of great crested newts and other amphibians; and no suitable habitat present for water voles, otters or dormice.
- 14.5. The report notes that there is good reptile habitat to the immediate south of the site and limited suitable foraging, resting and basking habitat to be found at the edges of the scrub areas. It is noted that common lizards are known to breed on the Golf Course, and sand lizards are known to breed to the immediate south within the dune system. However, the report notes that the application site is isolated from these habitats by high maintenance short mown grass (i.e. fairways) and would not be easily colonised by reptile species.
- 14.6. On this basis, the report concludes that further surveys are not required, but precautionary consideration of reptiles is advisable.
- 14.7. The report recommends, in the interests of reptiles, any scrub clearance should be conducted after a hand search for reptiles; and in the interests of birds, any planting scheme should include the introduction of shrubs and fruit trees, and no scrub or tree works should take place during the bird breeding season.
- 14.8. Overall, the report notes that the site has little ecological value and the areas of the application site are species poor and of low biodiversity value. It considered that there are no protected species likely to be present on land within the site or would be affected by the development. It considers any disturbance in respect of protected species could be adequately compensated for, creating an opportunity to improve the ecological value of the site. Therefore subject to appropriate mitigation, it is considered the scheme will result in overall net biodiversity gains.
- 14.9. On this basis, it is submitted that the application is in accordance with Policy Area 15 of the ALP and Policy ENV SP1 and ENV DM1 of the eALP.

15. FLOOD RISK

- 15.1. The application is supported by a Flood Risk Assessment (FRA) and associated Addendum prepared by Motion Consultants. This has been prepared following, and in light of, preliminary discussions with the Environment Agency.
- 15.2. The report notes that coastal, tidal and estuarial flooding is caused by high tides and extreme weather conditions impacting on land in the vicinity of the sea and estuaries. It notes that the

proposed development is located near to the sea and a tidal influenced watercourse; and therefore the development is at risk of coastal, tidal and estuarial flooding. It notes this has been discussed with the Environment Agency.

- 15.3. Having regard to national planning guidance on flood risk, it is pertinent to note that the proposed works must necessarily take place within this flood risk area, on the basis that the works specifically seek to improve the existing facilities of the Golf Course. There are no alternative practical options of locating the works within an area at lesser risk of flooding.
- 15.4. Notwithstanding this, and due to the nature of the works, the FRA concludes that there is only a minimal increase in the flood risk within the site or along adjacent land as a result of the proposals. It notes that pre-application discussions with the Environment Agency has confirmed that no flood compensation storage capacity is required, as the flood risk within the vicinity is due to tidal actions.
- 15.5. On this basis, it is considered that the scheme is in accordance with Section 10 of the NPPF, Policy GEN10 and GEN11 of the ALP, and Policy ENV DM1 of the eALP.

16. TRANSPORT

- 16.1. The application site is accessed from the A259, initially via Ferry Road, and then Rope Walk. This runs adjacent to the eastern boundary of the Golf Course and provides access, amongst others, to the Golf Club, Arun and Littlehampton Yacht Clubs, and West Beach carpark. The roadway is some 1.2km in length running from its junction with Ferry Road southwards toward the West Beach car park. It is a narrow road, subject to a 15mph speed limit.
- 16.2. The transportation impacts of the scheme have been assessed by Motion Consultants. They note that to import the estimated 45,000 cubic metres of material will require in the region of 3,750 vehicle trips, based on a carrying capacity of each vehicle of some 12 cubic metres. They note that the intention is to implement the work over a period of six months, and therefore estimate this would approximately equate to an average of some 29 loads per day.
- 16.3. The intention is for soil to be transported to the site by large four axle tipper vehicles. The proposed access point for these vehicles to deliver the material is approximately 950m to the south of the Rope Walk/Ferry Road junction to the existing emergency/maintenance access point from Rope Walk on to the Golf Course. It is estimated that this is equivalent to an approximate 4 minute drive time.
- 16.4. Noting the narrow nature of Rope Walk, the tipper vehicle would take up the majority of the carriageway, and given this, mitigation measures are proposed to be employed when importing materials to the site. These comprise:
- Works to take place between October and March, outside of the peak tourist season and therefore when West Beach carpark is likely to be quieter;
 - Temporary suspension of some parallel parking bays along Rope Walk within the vicinity of the Golf Club, to provide an additional passing bay; and

- Utilisation of a banksman onsite to guide the vehicles.

- 16.5. Given the works are proposed to take place between October and March, outside of the peak tourist season, it is anticipated that the access route, and in particular Rope Walk, will be very lightly trafficked during the construction phase; in particular in comparison to peak summer movements. To mitigate the prospect of congestion, it is proposed to temporarily suspend some of the parallel parking bays along Rope Walk within the vicinity of the Golf Club, to provide an additional passing bay. This, in addition to the existing passing bays within the vicinity of the yacht clubs on the narrow section of Rope Walk, leading to West Beach carpark, will minimise the prospect of congestion and delay.
- 16.6. It should be noted that whilst the tipper vehicles are large, the roadway is already narrow, and congestion can therefore arise when two vehicles pass each other. On this basis, the size of the vehicles are not likely to exacerbate the risk of congestion.
- 16.7. The application envisages the modest widening of the existing emergency/maintenance access way into the Golf Club that is proposed to be used to serve this development. This is proposed in order to ensure vehicles can safely enter and exit the site as detailed in the Swept Path Analysis shown in Drawing 161027-TK01 at Appendix A of the Transport Technical Note that accompanies this application.
- 16.8. It is also proposed that the existing height barrier (at 2.06m) sited a short way to the north of the existing/proposed access into the Golf Course, be re-located a short way to the south. It would be positioned south of the access point so that it does not impact the movement of tipper vehicles.
- 16.9. This proposal has been prepared cognisant of the existing large vehicles that travel along it for the biannual shingle collections that occur during December. The access point for the tipper vehicles in relation to that operation is further south (at the West Beach carpark) than proposed under this application.
- 16.10. It is considered having regard to the proposed timing of the construction phase, and the mitigation measures, that the scheme will not have an undue impact on accessibility and other users of Rope Walk during the construction phase of the works.

17. HERITAGE ASSETS

- 17.1. The application site is not a designated heritage asset. The closest designated heritage asset comprises the 19th century artillery fort known as Littlehampton Fort, located to the south-east of the application site and immediately to the north of the sand dunes on the edge of West Beach. This is a designated Scheduled Ancient Monument (List Entry No: 1005809). There are no other designated heritage assets in close proximity to the application site.
- 17.2. Littlehampton Fort belongs to the class of military installation termed 'battery's.' These comprise self-contained positions where guns were mounted for the purposes of offensive or defensive action; the objective being primarily to bring guns to bear on a specific area, to provide the appropriate range and to protect the guns (and crew) during action. Ammunition would usually be stored behind the rampart (the area known as The Gorge) and by the later 19th century, in purpose built magazines. Littlehampton Fort is considered to be a good example of a 19th century artillery

fort. It notes it has been covered by sand and it is considered this will have aided the preservation of the fort and associated remains, protecting it from weathering and erosion. It represents a phase of experimental fortification, following 19th century development in heavy guns with increased range.

- 17.3. The monument survives as upstanding structures and below ground remains which have been covered by shifting sand dunes. It is built of red brick and pebble and includes a battery for three 68-pounder guns and two 38-pounder guns, surrounded by a detached 'carnot' wall with three open bastions defended by musket loops. The exterior moat survives, but is largely buried by sand. The barrage block and offices to the rear were partially demolished in circa 1965 with only the foundations remaining visible. It is believed the guns were installed after the Crimean War (1853-1856), and the fort was decommissioned in 1873. It is considered probable that it was refortified during the Second World War with an observation post built nearby between 1940 and 1941.
- 17.4. The fort is located to the south-east of the application site and is separated by both the first green and the tees and fairway of the second hole. The scheme would raise existing ground levels to create a 'dune' landform. This would be reflective of, and in keeping with the landscape character of the area. The greatest area of change is some 200m from the closest part of the fort. Intervening land, comprises the fairway of the second hole, and is presently some 3m higher than the existing ground level of the practice ground. As a result, the proposed remodelling will not appear unduly prominent or dominant in views from the fort.
- 17.5. The works do not involve any excavation and so would be unlikely to affect any below ground heritage assets.
- 17.6. Having regard to Historic England's guidance on the assessment of the setting of heritage assets, it is considered that the works will have no material impact on the setting of the Scheduled Ancient Monument. The works relate in form and character to the wider Golf Course, which already defines the setting of the land to the north of the fort. The significance of the setting of the fort is in its relationship adjacent to the mouth of the River Arun (and its harbour), and to the coast. These lie to the east and south of the structure. Land to the north-west is less significant and sensitive in the setting of the heritage asset.
- 17.7. The works will be visible from the asset, but they will not materially change the setting of the asset, or detract from views or its appearance. The effect of the works, having regard to the wider setting of the Golf Course is considered to be neutral.
- 17.8. On this basis, the scheme is considered to have no undue impact on the setting of the heritage asset. On this basis, it is in accordance with Section 12 of the NPPF, Policy Area 16 of the ALP, and HER SP1 and HER DM6 of the eALP.

18. WHETHER THE SCHEME REPRESENTS SUSTAINABLE DEVELOPMENT

- 18.1. Paragraph 14 of the NPPF confirms that the underlying principle of the planning system is the presumption in favour of sustainable development. This is made up of the three dimensions of

economic, social and environmental, which are mutually dependant and should be sought jointly and simultaneously. This approach is supported through Policy SD SP1 of the eALP.

- 18.2. Having regard to this guidance, the application is considered to represent sustainable development in its three limbs.

Economic Sustainable Development

- 18.3. The scheme is required to facilitate the usability of the existing practice ground. This will underpin and enhance the vitality and viability of the Golf Club. This represents a positive impact on the economic role of sustainable development.
- 18.4. In the short term, the proposed works will provide jobs and supply chain benefits for the construction workers associated with the implementation phase of the scheme.

Social Sustainable Development

- 18.5. The proposed works will help to underpin and enhance the ongoing use of the Golf Course, which comprises a recreational facility benefitting the health and social wellbeing of the local community for residents, and the wider area for visitors.

Environmental Sustainable Development

- 18.6. The scheme has been designed to enhance the usability of the practice ground in a manner which is in keeping with the landscape character of the area; in particular having regard to the sand 'dune' system to the south. It can be implemented without undue impact on the character area, or its contribution to the Strategic Gap.
- 18.7. The application has been prepared following the completion of a Preliminary Ecological Appraisal. This confirms that the works can take place without undue impact, and with net gains in biodiversity terms.
- 18.8. The application is supported by a Flood Risk Assessment which confirms the scheme will have no undue impact on flood risk either on or offsite.
- 18.9. The works can be implemented without undue impact on the setting of the Scheduled Ancient Monument of Littlehampton Fort to the south.

19. SUMMARY

- 19.1. The application seeks to improve and enhance the usability of an existing practice ground area serving the Littlehampton Golf Club. This will contribute to the vitality and viability of the Golf Club for its members and visitors.
- 19.2. The application site is located within a countryside location, a short way to the west, and beyond the built-up edge of Littlehampton. In such areas, works in support of the ongoing operation of the Golf Course are appropriate, representing a countryside leisure use enhancing the social and health wellbeing of the local community and visitors.

- 19.3. The application envisages a landform which is sympathetic to and reflective of the dune character of the wider area in particular encapsulated by the landform immediately to the south of the Golf Course and adjacent to West Beach. The scheme will be sympathetic to the rural characteristics of the area, and be in full accordance with the objectives and requirements of land within the defined Strategic Gap.
- 19.4. The application is supported by a Preliminary Ecological Appraisal which confirms the works can take place without undue impact on matters of ecological interest. The application site comprises land of low biodiversity value, and the scheme, with appropriate planting etc, will be capable of delivering net gains in biodiversity interests.
- 19.5. The application site is defined as being at flood risk of coastal flooding. The application is accompanied by a Flood Risk Assessment and an associated Addendum which confirms the scheme will have no undue impact on flood risk either on or offsite, and no mitigatory flood risk storage capacity is required. This has been the subject of discussion and agreement with the Environment Agency prior to the preparation and submission of the application.
- 19.6. The scheme will incorporate the importation of some 45,000 cubic metres of material which it is proposed to be implemented over a six month period; and this would result in the importation of some 29 loads per day. It is proposed the works will take place during the winter, i.e. between October - March when Rope Walk is lightly trafficked. Furthermore, the scheme proposes the provision of an additional temporary passing bay to mitigate the potential for traffic congestion. The proposals have been prepared cognisant of the measures that take place during the biannual shingle works that utilise Rope Walk to access West Beach to the south of the application site. Having regard to the proposals it is considered the scheme will have no undue impact on traffic or highway safety.
- 19.7. The application site is located a short way to the north of the Scheduled Ancient Monument of Littlehampton Fort. The works will have no undue impact on below ground deposits, as it comprises the importation of material and raising ground levels only. The importance of the setting of the fort is in its proximity to the mouth of the River Arun to the east, and the coastline to the south.
- 19.8. The longstanding layout of the Golf Course to the north and west has little impact or contribution to the setting of the heritage asset. The proposed works will have no material impact on the setting of this asset, and is therefore acceptable in heritage terms.
- 19.9. The application represents sustainable development having regard to its three limbs of economic, social and environmental, and the associated guidance in the NPPF.
- 19.10. Overall, the application is in accordance with the up-to-date policies of the Development Plan, comprising the Arun Local Plan, and the made Littlehampton Neighbourhood Plan, together with relevant policies in the emerging Arun Local Plan.
- 19.11. It is submitted that there are no adverse impacts which significantly and demonstrably weigh against the scheme, and as such planning permission should be granted.