



THAKEHAM

Planning Statement incorporating Affordable Housing Statement & Statement of
Community Involvement

Land south of Cornfield Close, Littlehampton

On behalf of Clarion Housing Association Ltd

November 2018

Ref: TH-M637-PS

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1. Introduction

- 1.1. This statement has been prepared by Thakeham on behalf of the applicant Clarion Housing Association to support a Full planning application at Land south of Cornfield Close, Littlehampton ('the site').
- 1.2. This Full planning application is for:
Demolition of existing buildings and the erection of 77 residential homes with associated access, car parking, cycle parking, refuse/recycling storage, landscaping, earthworks and infrastructure. ('the proposed development')
- 1.3. The site is situated within the settlement of Littlehampton, and comprises a vacant former caravan and camping site, with access from Cornfield Close. There are residential properties located to the north of the site, with Worthing Road beyond. Cornfield School is located to the north-west of the site, with Littlehampton Academy situated to the south. The site is densely screened with trees and hedges to the east, south and west.
- 1.4. It is considered that the proposed development could provide high quality housing in a sustainable location to assist the district in meeting their housing need, as per the requirements of national policy. The site also falls within the 'Fitzalan Corridor' which is a defined preferred location for residential development, as detailed within the adopted Littlehampton Neighbourhood Plan.
- 1.5. The Planning Statement is written in support of the Full planning application. It describes the site and surrounding area; summarises the relevant planning history for this site; explains the consultation process undertaken to date, details the proposed development; and sets out the relevant planning policy framework which the planning application will be assessed against.
- 1.6. The following documents form part of this Full planning application, and this Planning Statement is to be read in conjunction with these plans and documents:
 - Application Form & Covering Letter (including drawing schedule)
 - Architectural Drawings, RH Partnership Architects
 - Design and Access Statement, RH Partnership Architects

- Ecological Impact Assessment, ACD Environmental Ltd
- Ground Investigation Report, Ground Investigation Report
- Flood Risk Assessment, Glanville Group
- Foul and Surface Water Drainage Strategy, Glanville Group
- Landscaping Strategy, ACD Environmental Ltd
- Transport Statement, Glanville Group
- Tree Survey and Arboricultural Impact Assessment and Method Statement, ACD Environmental Ltd
- Archaeological and Heritage Desk Based Assessment by ACD Environmental Ltd

2. The Site and Surrounding Area

- 2.1. This section provides a short description of the application site and surrounding area. Please refer to the submitted Design and Access Statement prepared by RHP Architects for further information on the site and surrounding context.

The Site

- 2.2. The site is fairly square in shape and comprises a vacant former caravan and camping site within the administrative area of Arun District Council (ADC) and is approximately 2.7 hectares in size. The site currently comprises a large area of undeveloped grassland, with the exception of the access road which extends southwards into the site and circles the site perimeter. There are a number of small vacant buildings in the north east corner of the site. The topography of the site is relatively level.
- 2.3. The red line boundary included in Appendix A identifies the extent of the application site, whilst the figure below illustrates the location of the site within its immediate context.

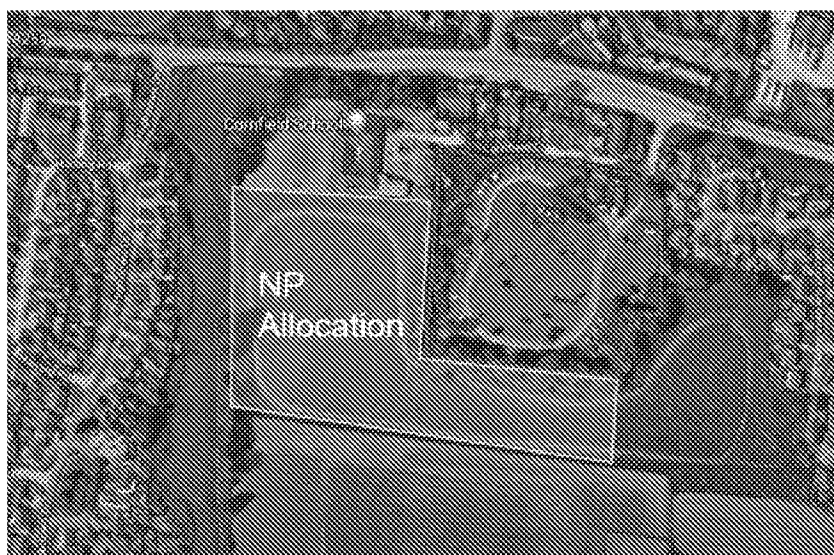


- 2.4. The site is bound by Cornfield Close to the north, Oakcroft Gardens to the east and undeveloped land to the south and west associated with Littlehampton Academy,

which has the benefit of an allocation for residential development in the Littlehampton Neighbourhood Plan. Cornfield School is located north west of the site.

- 2.5. The site comprises private land and does not have any public access. Vehicular and pedestrian access can be achieved from Cornfield Close.
- 2.6. As the site lies within the settlement boundary of Littlehampton, as defined on the adopted Arun Local Plan 2011-2031 proposals maps, the context of the site is largely residential and is surrounded by development. As discussed above, there is intervening vacant grassland and playing fields to the south of the site, associated with Littlehampton Academy. An area of this land, as shown in the image below, which bounds the southern and western boundaries of the site has the benefit of an allocation for residential development in the Littlehampton Neighbourhood Plan (LNP), this allocation is defined under Policy 4 of the LNP and details that the site is allocated for:

'approximately 100 dwellings comprising primarily 2, 3 and 4-bedroom houses, to be delivered in the period 2020-2029, subject to the provision of a new open space on land adjacent to Oakcroft Gardens.'



Surrounding Area

- 2.7. The surrounding land uses comprise moderately dense residential development, with a variety of house sizes and types to meet various needs. Highdown Drive lies to the

west of the site and comprises a mixture of detached and semi-detached 2 storey houses and chalet bungalows, Cornfield Close provides terraced and semi-detached 2 storey houses and Oakcroft Gardens to the east provides a mix of bungalows and chalet bungalows. Whilst development directly north of the A259 comprises 2, 3 and 4 storey houses and apartments. The site is close to two schools, Cornfield School to the north west of the site, and Littlehampton Academy to the south.

- 2.8. Cornfield Close is a cul-de-sac which takes access from and runs parallel to Worthing Road (A259) approximately 250m west of the Bodyshop roundabout. The site is well serviced by a frequent bus route (No. 700 Coastliner) providing links to Brighton and central Littlehampton. Bus stops are located just 450m from the site and the route runs every 10 minutes. In addition, Littlehampton Railway Station is located approximately 1.5km south west of the site and provides mainline services to towns and cities along the south coast and London.
- 2.9. There are existing footpaths serving Cornfield Close and the surrounding roads, providing safe walking routes to local amenities and employment opportunities including a local shell garage and associated local shop to the east of the site, with further amenities located along Wick Street including a pharmacy, florist, takeaways and a café, west of the site.
- 2.10. The local area also includes a variety of public footpaths and open spaces. Worthing Recreation Ground is located north west of the site, providing playing pitches and equipped play areas. Whilst Brookfield Park just north east of the site provides further recreation opportunities, including equipped play areas to meet the needs of varying age groups and walking routes.
- 2.11. It is considered that the site itself is unconstrained, located in a sustainable location, and is situated within an established residential area within an existing settlement.
- 2.12. In terms of existing character, Littlehampton is largely formed of mid-20th century suburban dwellings, however there is still a variety of house types which exist. These range from bungalows, terraced and semi-detached houses through to larger detached family houses.

- 2.13. Buildings are predominantly 2 storey, with some bungalows and 3 to 4 storey buildings. There are a variety of roof forms across the town with a mixture of hipped pitched and gable fronted roof forms.
- 2.14. Materials are varied comprising predominantly concrete roof tiles, some tile hanging, dark brown and red brick and timber cladding and render.

3. Planning background

Historic Planning context

- 3.1. There have been a number of historic applications on the site and the surrounding land. These largely date back to the 1990s with a more recent application in 2007, consequently there has been a significant change in context within the surrounding area. These applications are set out below:

LU/108/66

- 3.2. 1966 'Use of land as a touring caravan site'. This application was withdrawn.

LU/310/91 – Land adjacent to Cornfield Close, Littlehampton, West Sussex

- 3.3. 1991 'Application under Regulation 5 of the Town and Country Planning General Regulations 1976 for Outline planning permission for residential development. This application was approved on the 7th May 1992.

LU/63/93 – Kencare Holiday Park, Cornfield Close, Worthing Road

- 3.4. 1993 'Change of use from touring caravan site to tents and touring caravans. Non-compliance with condition No.3 relating to layout of caravans and Condition 4 relating to time limitation imposed on planning permission LU/37/68 dates 16.2.68. siting of sanitary blocks and 1 warden caravan.' This application was approved on the 7th May 1993.

LU/30/97 – Rutherfords Touring Park, Cornfield Close, Worthing Road

- 3.5. 1997 'Non-compliance with Condition No.1 imposed on planning permission LU/63/93 for seasonal caravans for 10 months (max. 20) and winter storage for touring vans (max.25). This application was approved.
- 3.6. In addition to the above, the land surrounding the western, eastern and southern boundaries of the site, which is now allocated for development in the Littlehampton Neighbourhood Plan, was subject to a residential planning application for 200 dwellings in 2006, albeit this was withdrawn in December 2007.

Current Planning Context

National Planning Policy Framework

3.7. The National Planning Policy Framework (NPPF), July 2018, is a material consideration in the determination of this planning application together with guidance set out in National Planning Practice Guidance (NPPG).

3.8. The achievement of sustainable development is at the core of the document and there is a presumption in favour of sustainable development. There are three overarching objectives to sustainable development: economic, social and environment and these should not be considered in isolation and should be pursued in mutually supportive ways. The planning system must seek opportunities to contribute towards these objectives through:

- Economic Objective – contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places at the right time to support growth
- Social Objective – supporting strong, vibrant and healthy communities.
- Environmental Objective – contributing to protecting and enhancing our natural, built and historic environment.

3.9. Whilst all guidance in the NPPF is relevant to the proposal, the following paragraphs are considered to be of particular importance.

3.10. Paragraph 10 states that *‘so that sustainable development is pursued in a positive way, at the heart of the framework is a **presumption in favour of sustainable development** (paragraph 11).*

3.11. Paragraph 11 then goes on to state:

‘Plans and decisions should apply a presumption in favour of sustainable development’...

*For **decision-taking** this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:

i. The application of policies in this Framework that protect areas or assets of particular importance provides clear reason for refusing the development proposed⁶; or

ii. 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.

Footnote 7 details that:

'This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.'

Delivering a sufficient supply of homes

3.12. Paragraph 59 details the Government's objective *'to significantly boost the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed within unnecessary delay.*

3.13. *In accordance with this objective, paragraph 67 details that LPAs should:*

'have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.'

3.14. Paragraph 73 then goes on to state that LPAs:

'should identify and update annually and supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or*
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- c) 20% where there has been significant under delivery of housing over the previous three year, to improve the prospect of achieving the planning supply.*

Making effective use of land

- 3.15. Chapter 11 of the NPPF details the requirements for ensuring the land is used effectively:

'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land'⁴⁴.

Arun Local Plan 2011-2031 (July 2018)

- 3.16. The Arun Local Plan 2011-2031 was adopted on the 18th July 2018, superseding all policies within the previous Local Plan 2003.
- 3.17. Given the recent adoption of the Local Plan, all policies have been examined for conformity with the NPPF, albeit against the now superseded 2012 version, in accordance with the transitional arrangements for the 2018 NPPF.
- 3.18. The most relevant Local Plan policies are the following:

Policy SD SP1: Sustainable Development

Policy SD SP2: Built-up area boundary

Policy H DM1: Housing Mix
Policy AH SP2: Affordable Housing
Policy D SP1: Design
Policy D DM1: Aspects of form and design quality
Policy D DM2: Internal Space Standards
Policy ECC SP2: Energy and climate change mitigation
Policy OSR DM1.1: Protection of open space, outdoor and indoor sport, community, arts and cultural facilities.
Policy T DM1: Sustainable Travel and Public Rights of Way
Policy ENV DM5: Development and biodiversity
Policy W DM2: Flood Risk
Policy W DM3: Sustainable Urban Drainage Systems

Littlehampton Neighbourhood Plan

3.19. The Littlehampton Neighbourhood Plan (LNP) was made part of the development plan on 5th November 2014. This document therefore carries weight in the determination of this planning application.

3.20. Paragraph 30 of the NPPF states that:

'Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.'

3.21. Following adoption of the LNP in 2014, the Arun Local Plan 2011-2031 was adopted in 2018, therefore in accordance with paragraph 30, where there are conflicting policies between the two documents the Local Plan takes precedent.

3.22. Paragraph 14 outlines how the presumption in favour of sustainable development in triggered in relation to Neighbourhood Plans:

'In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits apply⁸

- a) The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;*
- b) The neighbourhood plan contains specific policies and allocations to meet its identified housing requirement;*
- c) The local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and*
- d) The local planning authority's housing delivery was at least 45% of that required over the previous three years.'*

3.23. As per the transitional arrangements set out in Annex 1 of the NPPF from the 12th December 2018, as the Littlehampton Neighbourhood Plan was adopted over two years ago, paragraph 14 will not be applicable.

3.24. For the purpose of this planning applications, the most relevant LNP policies are:

Policy 1: The Presumption of favour of sustainable development

Policy 2: A Spatial Plan for the Town

Policy 3: Housing Supply

Policy 22: Design of New Development

4. Consultation

Public Consultation

- 4.1. A public consultation leaflet was distributed to the local area setting out the initial proposals, shown at Appendix B, and following this a moderate response was received and feedback at that time, went to inform the evolution of the design.
- 4.2. Positive points were raised as to the design of scheme and the delivery of much needed market and affordable housing in the area, referencing the positive impact that this would have to the locality. Whilst concerns were raised regarding the access and egress to the site and how this would impact on the traffic in the area, comments were also made in this respect regarding the planned improvements to the A259. Concerns were also raised regarding the site's former use as landfill.
- 4.3. In addition to the above, general comments and observations were received including a preference for boundary tree's to be retained and biodiversity to be enhanced across the site as part of any proposals.
- 4.4. Littlehampton Town Council was also consulted as part of this process, and a number of leaflets were provided to them to be also made available to local residents at their offices.

Pre-application Advice

- 4.5. A request for pre-application advice was submitted to ADC on 11th December 2017, regarding the proposals, accompanied by supporting information.
- 4.6. A meeting was then held on the 18th January 2018 with Senior Planning Officer, Ross Leal, to discuss the proposals in more detail. Following initial comments, a revised scheme was provided to ADC, this then formed the basis for the formal pre-application advice letter, received from ADC on the 9th July 2018. The Design Evolution and how this was informed by the pre-application engagement with the local planning authority is discussed in more detail at Chapter 3 of the Design and Access Statement which accompanies the planning application.

5. The Proposed Development

- 5.1. This section provides full details of the proposed development being sought as part of this Application. We are seeking Full planning permission for:

Demolition of existing buildings and the erection of 77 residential homes with associated access, car parking, cycle parking, refuse/recycling storage, landscaping, earthworks and infrastructure.

- 5.2. It is considered that the Proposed Development represents an excellent development opportunity within a sustainable location that could assist with meeting immediate local housing needs, including high quality design and affordable housing.
- 5.3. Further Details of the Proposed Development are set out below and, in the Design and Access Statement which accompanies this application.

Residential Provision

- 5.4. Clarion Housing Association Ltd ('Clarion') are seeking Full planning permission for the erection of 77 new homes. A minimum of 30% would be allocated as affordable homes. The affordable Homes would be managed by Clarion.
- 5.5. In regards to the type of homes proposed, Clarion are seeking detailed approval for 18 flats and 59 houses.
- 5.6. The proposed residential mix is set out in Table 1 below.

	Housing Type	1 Bed	2 Bed	3 Bed	4 Bed	Total
Private	House		17	31		48
	Flat		6			6
Affordable	House		10	1		11
	Flat	2	10			12
Total		2	43	32	0	77

Table 1: Residential Unit Mix

- 5.7. The proposed development provides a mix of public and private amenity space across the site to meet a variety of needs. The substantial amount of public amenity space ensures that all residents will be able to easily access and utilise this space at various points across the development.

Layout and Scale

- 5.8. The proposed layout of the development is shown below, with a single access point extending into the site and around a new circulation road. The focal point of the scheme is a significant central public amenity space which is well overlooked and provides opportunity for recreation and informal play as well as potential for a Local Area of Play (LAP) to be integrated into this space. The design of the houses and flats ensures visual interest and consistency.



- 5.9. The buildings proposed are predominantly 2 storey, with 3 storey and 4 storey buildings accommodating the apartments. The careful massing of the roofs and facades to both apartment blocks and separation for neighbouring two storey dwellings has been designed to provide variation of scale within the overall site.

- 5.10. As discussed above and as detailed in the Design and Access Statement, the layout is designed around areas of visual amenity, creating a sense of place for prospective residents. A new 'public green' is proposed as a focal feature of the site. In addition, generous private and communal amenity spaces have been proposed for the apartment buildings with good natural surveillance.
- 5.11. Pedestrian routes have been proposed throughout the site to encourage walking, through the provision of safe routes into and around the site.

External Appearance

- 5.12. Various house types are proposed within the development to respond and integrate into the existing context. The emphasis is not on creating juxtaposing styles by creating a coherent sense of place with a subtle variation in development form, materials and architectural detailing.
- 5.13. The external finishes have been chosen to be sympathetic to the local vernacular and create a high-quality development. It is proposed that full material details will be subject to a condition attached to the planning permission.
- 5.14. A more comprehensive overview of the design can be found within the Design and Access Statement which accompanies the planning application.

Landscaping

- 5.15. The planning submission is accompanied by a Landscape Masterplan, detailing the proposed landscaping strategy which comprises the following principle elements:
- Japanese knotweed to be removed and replaced with a mix of native woody varieties.
 - Front gardens to be defined by hedging where possible to create defined boundaries
 - Native trees and wildflower meadow planting to areas of open space to enhance biodiversity and ensure visual amenity.
 - Retention of existing boundary vegetation and infill where appropriate to increase structure and biodiversity/

- Introduction of shrub and herbaceous borders to comprise species known to benefit pollinators

Biodiversity

- 5.16. The site is dominated by managed grassland, with single-storey buildings concentrate on the north-east corner of the site. Other habitats on site include introduced shrub, scattered trees, a tree line, dense scrub, refuse-tips, tall ruderal vegetation and hedgerows.
- 5.17. Habitats of moderate ecological value such as the boundary trees are proposed to the retained and enhanced within the development.
- 5.18. A number of biodiversity enhancements have been proposed, this includes the strengthening of the western boundary hedgerow, creation of new native species-rich hedgerows along the southern and eastern boundaries. This will provide suitable shelter for slow-worm, hedgehog, nesting birds and enhanced foraging habitat for bats. Tree planting, shrub planting and meadow sowing of species of known benefit to wildlife and the creation of hibernacula for reptiles and artificial bird and bat boxes are proposed.
- 5.19. Biodiversity and proposed enhancements are detailed further within the Ecological Impact Assessment which accompanies the planning application.

Transport

- 5.20. The proposed development would be served from the existing access point from Cornfield Close.
- 5.21. Pedestrian access to the site would be provided by a 2m footway along the western side, with an uncontrolled pedestrian crossing proposed to provide a link to the existing footway on the opposite side of Cornfield Close.
- 5.22. The proposed level of car and cycle parking within the site is in line with local guidance.

- 5.23. The site's internal road geometries are such that large vehicles such as a refuse vehicle can negotiate the carriageways and perform turning manoeuvres safely.

Flood Risk and Drainage

- 5.24. The Proposed Development is located entirely within Flood Zone 1 and is therefore is considered to have little or no risk of fluvial flooding. In addition, and according to mapping from the Environment Agency, the site is considered at very low risk of surface water flooding.
- 5.25. The proposed surface water drainage strategy employs a geocellular crate soakaway on the public open space, following the removal of made ground. The strategy also proposes permeable paving in parking spaces provided for the apartments. The proposed strategy will direct surface water run-off generated on site to a soakaway, which will discharge flows by infiltration through clean soils, not made ground.
- 5.26. Please see the submitted Flood Risk Assessment (produced by Glanville Group) for further information on flooding, the surface water strategy and drainage strategy.

6. Conformity with Planning Policy

- 6.1. This section demonstrates how the Proposed Development complies with relevant national and local planning policy.

National Planning Policy

- 6.2. The National Planning Policy Framework (NPPF), 2018, is a material consideration in the determination of this planning application together with guidance set out in National Planning Practice Guidance (PPG).

- 6.3. Paragraph 7 of the NPPF states:

'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs

- 6.4. Whilst Paragraph 10 seeks the following:

*'So that sustainable development is pursued in a positive way, at the heart of the framework is a **presumption in favour of sustainable development** (paragraph 11)*

- 6.5. Paragraph 11 states that *'Plans and decisions should apply a presumption in favour of sustainable development.'* Before detailing that for decision making this means:

'c) Approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:

i. the application of policies in this Framework that protect areas assets of particular importance provides a clear reason for refusing the development⁶, or

- ii. 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.

6.5 Paragraph 38 then goes on to say that:

'Local Planning Authorities should approach decision on proposed development in a positive and creative way. This should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improved economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.'

Development Plan

- 6.6. In accordance with Part 3, Section 38(6) of the Planning and Compulsory Purchase Act (PCPA) 2004, planning applications will be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 6.7. For the purpose of this planning application, the Development Plan comprises the Arun Local Plan 2011-2031(ALP) and the Littlehampton Neighbourhood Plan (LNP).

Site Designations

- 6.8. In accordance with Policy SD SP2 in the ALP and the proposals map, the site is located within the defined built-up area boundary, with no further designation associated with the site within the ALP.
- 6.9. Policy SD SP2 states that 'Built up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan'.
- 6.10. In addition to this, the LNP identifies the site as within the Fitzalan corridor, as shown in Key Diagram Plan C.

- 6.11. Policy 2 of the LNP outlines the intended spatial strategy for the town, stating that:

'The Neighbourhood Plan concentrates future housing, economic and community-related development within the built-up area boundary of Littlehampton and especially within the Fitzalan corridor connecting the Strategic housing allocations at North Littlehampton (Toddington-north of the railway) and at Courtwick Park with the Littlehampton Academy, the Town Centre, the Community Hub and 'the Green', as shown on the key diagram.'

Principle of Residential Development

- 6.12. As identified above, the ALP proposals map identifies that the site does not fall within any specific policy designations.
- 6.13. The adopted proposals maps show that the site falls within the defined built-up area boundary, with an allocated housing site for approximately 100 residential dwellings (Neighbourhood Plan Policy 4: Land North of Littlehampton Academy) wrapped around the western and southern boundaries of the site. It is therefore considered that this area is one of change and with a predominantly residential character.
- 6.14. In addition to this, the LNP indicates that the site falls within the Fitzalan Corridor as shown in key diagram Plan C and within the built-up area boundary. The site is therefore located in a defined preferred location for residential development, as indicated in Policy 2 of the LNP (see paragraph 6.11. of this Planning Statement)
- 6.15. Policy 3 of the LNP provides a requirement for the development of at least 200 homes in the period 2014 – 2029. The LNP has sought to make a number of housing allocations to contribute to this requirement, however it also indicates that it is expected that windfall schemes will come forward to contribute to housing supply in the area. The supporting text for Policy 2 states at paragraph 4.3.3:

'In addition, there are approximately 200 dwellings that already have planning consent in the town. There will also be an additional supply of new housing that comes from windfall sites that lie within the built-up area which have not been identified in this plan.'

- 6.16. In a formal pre-application advice letter, received 9th July 2018, ADC indicated the following in respect of the principle:

'The site lies within the boundary of the Built-up Area. It has had lawful use as a caravan park since the early 1970s and a history of residential occupation for almost 50 years. The site is served by an existing access for Worthing Road. It is well screened from the surrounding area by mature vegetation landscaping on all sides. There is established residential development to the north and east and a school to the west with open space to the south. On this basis the principle of residential development may be considered to be acceptable and would contribute to housing land supply in Arun District.'

'The site falls within the Fitzalan Corridor and is therefore supported for residential development as per policy 3 of the Littlehampton Neighbourhood Plan.'

- 6.17. In addition to the above, the site has been considered for residential development through the Councils 2017 Housing and Economic Land Availability Assessment under reference LU12a, whereby the site was assessed as Achievable, Suitable and Deliverable.
- 6.18. Throughout the examination of the ALP it was recognised that ADC had a significant Objectively Assessed Housing Need (OAHN) to be met over the plan period. Consequently, the inspector agreed to a stepped approach to housing delivery, considering this approach to be justified by the particular circumstances. This approach seeks 610dpa between 2011/12 and 2015/2016 rising to a peak of 1,310 dpa between 2020/21 and 2025/26.
- 6.19. To inform the examination, ADC published their Authority Monitoring Report 1st April 2016 – 31st March 2017 in January 2018 (2016-17 AMR), identifying a suggested supply of 3,218 dwellings for the period 2017-2022. This projected supply included strategic allocations, neighbourhood plan allocation, windfalls, but importantly also a number of HELAA sites. Appendix 3 of the 2016-17 AMR details HELAA sites included in the 5 year HLS calculation which includes the application site (reference LU12a). It is therefore evident that the council are expecting this site to come forward to contribute towards their housing need in the next five years.

- 6.20. Utilising the figures in the 2016-17 AMR the Inspector confirmed at paragraph 95 of the final examination report that, *'based on up-to-date figures and applying a stepped delivery, a 20% buffer and the Sedgefield method to making up the shortfall supply was 5.3 years at 31st March 2017.'*
- 6.21. Given the above, it is considered that the site represents an excellent development opportunity within a sustainable location that could assist with meeting immediate local housing need, including affordable housing.

Residential Provision

Affordable Housing

- 6.22. Policy AH SP2 of the ALP sets out a requirement for all developments of 11 units of more to provide a minimum of 30% of the total number of units proposed on the site to be provided as affordable housing.
- 6.23. The planning application seeks to identify 23 out of 77 dwellings proposed to be affordable, equating to 30% provision. In addition, this scheme represents a tenure blind approach with units distributed throughout the scheme. This therefore accords with the requirements of Policy AH SP2 of the ALP.
- 6.24. It is expected that tenure of proposed affordable housing units will be finalised through discussions with the Council during determination of the application.

Unit Mix

- 6.25. Policy H DM1 of the ALP sets out requirement for a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations.
- 6.26. The Coastal West Sussex Strategic Housing Market Assessment Update, November 2012 provides the most up-to-date recommendations, providing the following estimated size of dwellings required in Arun over the period 2011-2031.

	1-bedroom	2-bedroom	3-bedroom	4+bedroom
Affordable	29.2%	36.1%	30.9%	3.7%
Market	9.2%	33.4%	45.6%	11.9%

6.27. This planning application seeks detailed approval for following mix:

	1-bedroom	2-bedroom	3-bedroom	4+bedroom
Affordable	9%	87%	4%	0%
Market	0%	43%	57%	0%

6.28. Whilst the proposed mix represents a departure from the projected percentage needs for the District, in favour of a higher proportion of smaller units. There is an acute need for smaller, more affordable dwellings across the district, and the site's location within Littlehampton, a main settlement in the district, supports the provision of smaller residential units in this sustainable location, to meet these needs.

Design

6.29. The government attaches great importance to design, Section 12 of the NPPF promotes high quality design and inclusive design for all development whilst optimising the potential of sites and responding to local character.

6.30. Paragraph 124 states that *'The creation of high quality buildings and places is fundamental to what planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*

6.31. Paragraph 127 sets out detailed expectations in respect of design, ensuring developments:

- Function well and add to overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive through the use of good architecture and appropriate landscaping
- Respond to the historic environment and local character, whilst not being discouraged from exploring innovative styles

- Establish a strong sense of place, using streetscapes and building types and materials to create attractive and welcoming places to live
- Optimise the potential of the site
- Create a safe, inclusive and accessible environment whilst promoting health and well-being.

6.32. Within the above context, paragraph 130 firmly identifies that where a proposal accords with clear expectations in plan policies regarding design, *‘design should not be used by the decision-maker as a valid reason to object to development.’*

6.33. Policy D SP1 of the ALP provides the overarching strategic requirement in terms of design for development proposals, requiring proposals to seek the efficient use of land whilst respecting the context of their surroundings.

6.34. Policy D DM1 of the ALP provide clear aspects of form and design quality, of which any development proposals will be considered against. These are summarised as follows

- Character – make the best possible use of the available land by reflecting or improving upon the character of the site in terms of its scale, massing, aspect, siting, layout, density, building, materials (colour, texture), landscaping, and design features.
- Appearance/attractiveness – Demonstrate a high standard of architectural and design principles.
- Impact – minimise impact on neighbouring properties
- Innovation – Raise standards of design by embracing appropriate innovative design.
- Adaptability – Acknowledge diversity and difference through inclusive design.
- Crime Prevention – Incorporate security measures to ensure that spaces are designed to feel safe
- Trees and woodland – incorporate high quality existing trees into development scheme and include new tree planting within the proposals where appropriate
- Solar Gain – where possible maximise sunlight and passive solar energy

- Public Realm - ensure areas within the public realm are safe, attractive and usable
- Movement – consider walking and cycling as an integral part of overall design concept
- Legibility – Contribute to the ease of navigation within new development
- Public Art – Where appropriate, incorporate public art into proposals.
- Density – proposals should accommodate appropriate densities, whilst respecting the local vernacular.
- Scale – scale of development should respond to locality.

6.35. As set out in the submitted Design and Access Statement the proposals have been informed by analysis of the character and style of the properties surrounding the site and the wider area. The scale and height of the all proposed buildings is reflective of the local vernacular, whilst seeking to increase densities in appropriate locations to make best use of the site. It is considered that through the design of the elevational treatments the proposed development will have an attractive and identifiable character.

6.36. The layout of the proposed development has been designed to respect the constraints of the site whilst ensuring that sufficient and high quality open space is provided for occupants and surrounding residents. The layout respects the perimeter trees and proposes enhancements where appropriate to minimise impact of neighbouring properties whilst improving biodiversity.

6.37. It is considered that the proposed scheme represents a high quality approach which responds to and complies with the requirements of the NPPF and Policies D SP1, D DM1. The submitted Design and Access Statement should be read in conjunction with this Planning Statement.

Nationally Described Space Standards

6.38. Policy D DM2 requires internal spaces to be an appropriate size, to meet the requirements of all occupants and their changing needs. The Policy States that Nationally Described Space Standards (NDSS) will be used in respect of this requirement.

- 6.39. In conformity with Policy D DM2, the proposals seek meet this requirement. Appendix C provides an accommodation schedule for the proposed development which incorporates an analysis of the proposed gross internal areas (GIAs) against those required for NDSS.

Sustainability

- 6.40. Policy ECC SP2 requires residential development to:

- a) 'Achieve Energy efficiency measures that reflect the current standards applicable at the time of submission;*
- b) Use design and layout to promote energy efficiency; and*
- c) Incorporate decentralised, renewable and low carbon energy systems, for example small scale renewable energy systems such as solar panels'*

- 6.41. Chapter 9 of the submitted Design and Access Statement details how the proposed properties have been designed the maximise solar gains whilst incorporating appropriate natural ventilation to assist with summer temperatures.

- 6.42. In addition, these energy efficiency measures, Policy ECC SP2 also requires:

'All major development must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable. Energy efficiency measures will be taken into consideration when the total predicted energy requirements are calculated'

- 6.43. It is proposed that details of this would be subject to a condition attached to the planning permission.

Open Space Provision

- 6.44. Policy OSR DM1 sets out the Open Space, sport and recreation requirements for new development at paragraph 2. This states that alongside the provision of housing:

'a) Open space provision in accordance with the guidance set out in the current Open Space Study. In some parts of the District open space provision of new open space is not deemed necessary but what is needed is to seek contributions for quality

improvements and/or new offsite provision in order to address any future demand. For larger scale developments, the quantity standards should be used to help determine the requirements for open space provision as part of that development.'

- 6.45. In accordance with Policy OSR DM1, we have looked to the quantity standards set out within the 'Arun District Council Open Space Study Standards Paper September 2016' to inform our proposals. The site falls within the 'East Arun' area referred to within the document, the document sets out the following provision requirements for developments within East Arun:

Typology	Standard per 1,000 population (ha)
Allotment	0.25
Amenity Greenspace	1.04
Natural/semi natural	0.31
Parks	0.31
Provision for Children and young people	0.05

- 6.46. Using the average household occupancy rate of 2.5 persons per dwelling, a scheme of 77 dwellings would result in an occupancy level of 192.5. Using the above standards the following open space requirement is calculated for the proposed development:

Typology	Open Space Requirement (ha)
Allotment	0.05
Amenity Greenspace	0.2
Natural/semi natural	0.06
Parks	0.06
Provision for Children and young people	0.01

- 6.47. In exceedance of the above requirements, the proposal makes on-site provision for 0.343 ha of public open space comprising landscaped areas offering opportunities for recreation and informal children's play.

- 6.48. It is therefore considered that the proposals exceed the requirements of Policy OSR DM1 in terms of on-site open space provision.

Biodiversity

- 6.49. Paragraph 175 of the NPPF seeks to ensure the habitats and biodiversity are a key thought within the development proposals, seeking protection where relevant of important irreplaceable habitats and encouraging biodiversity enhancements as a result of new development.

- 6.50. Policy ENV DM5 of the ALP also stipulates that:

'Development Schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes and well as landscape features minimising adverse impacts on existing habitats (whether designated or not). Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitats areas and open spaces. Together these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement,

Where there is evidence of a protected species on a proposed development site, planning applications shall include a detailed survey of the subject species. This involves consideration of any impacts that will affect the species directly or indirectly, whether within the application site or in an area outside of the site, which may be indirectly affected by the proposals. All surveys shall be carried out at the appropriate time of year and shall be undertaken by a qualified, and where appropriate, suitable licensed person.'

- 6.51. There are no designated sites of nature conservation value within or immediately adjacent to the site.
- 6.52. The site is dominated by managed grassland, with single-storey buildings concentrate on the north-east corner of the site. Other habitats on site include introduced shrub, scattered trees, a tree line, dense scrub, refuse-tips, tall ruderal vegetation and hedgerows.

- 6.53. A Phase 1 Habitat Survey was carried out in January 2018, whereby the site was assessed to potentially support notable species including reptiles and bats, precautionary measures were advised alongside recommendations for further surveys. Further surveys took place as required in May 2018, details of these surveys and the proposed mitigation in respect of relevant habitats is detailed within the Ecological Impact Assessment (EcIA), produced by ACD Environmental Ltd, which accompanies this application.
- 6.54. As detailed within the ECIA, a number of biodiversity enhancements have been proposed. These include wildflower meadow creation, new tree and hedgerow planting, japanese knotweed removal, wildlife beneficial borders, and bat and bird boxes. It is considered that the enhancements proposed, will offer a net gain in biodiversity, in accordance with the requirements of the NPPF and ALP Policy ENV DM5.

Transport

- 6.55. Section 9 of the NPPF: Promoting Sustainable Transport sets out that LPAs should support patterns of development which facilitate the use of sustainable modes of transport.

- 6.56. Paragraph 108 stipulates that:

'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) Appropriate opportunities to promote sustainable transport modes can be – or have been - taken up, given the type of development and its location;*
- b) Safe and suitable access to the site can be achieved for all users; and*
- c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree'*

- 6.57. Policies T SP1 and T DM1 of the ALP provide requirements in terms of Transport and Development. Whilst Policy 22: Design of New Development of the LNP seeks to

ensure that parking is provided in accordance with guidance from West Sussex County Council.

- 6.58. A full Transport Statement, produced by Glanville Group, accompanies the planning application detailing how proposed scheme complies with National Policy and Local Policy and Guidance.

Access

- 6.59. Policy T SP1 states that the Council will ensure that development provides safe access onto the highway network; contributes to highway improvements and promotes sustainable transport.
- 6.60. Vehicular access is proposed to be taken from the A259 via the existing priority 'T' junction with Cornfield Close. It is proposed to construct a new 5.5m wide access road taken from Cornfield Close with a 2m wide footway along the western side. An uncontrolled pedestrian crossing is proposed in order to provide a link to the existing footway on the opposite side of Cornfield Close.
- 6.61. Paragraph 109 of the NPPF states that: *'Development should only be prevented or refused on highways ground if there would be an unacceptable impact of highway safety, or the residual cumulative impacts on the road network with be severe.'*
- 6.62. As demonstrated in the supporting Transport Statement, the transport impacts of the proposed development are not considered to be severe and suitable safe access can be achieved.

Car Parking and Cycle Parking

- 6.63. Policy T SP1 states that the Council will support transport and development which:
- 'd) Incorporates appropriate levels of parking in line with West Sussex County Council guidance on parking provision and the forthcoming Arun Design Guide taking into consideration the impact of development upon on-street parking'*

- 6.64. The proposed development provides 162 car parking spaces on site, consisting of 142 allocated parking spaces, 6 unallocated and 14 visitor spaces, equating to just over 2 spaces per dwelling.
- 6.65. The proposed level of car parking is in accordance with the standards set on in West Sussex County Council's 'Guidance for Parking in New Residential Developments September 2010. The WSCC 'Car Ownership Parking Demand Tool' was used to calculate the level of parking required for the proposed development mix.
- 6.66. Cycle parking has been proposed in accordance with current cycle parking standards. For individual dwellings residents will be able to store bikes securely in their rear gardens, with covered communal cycle stores proposed for the apartments.

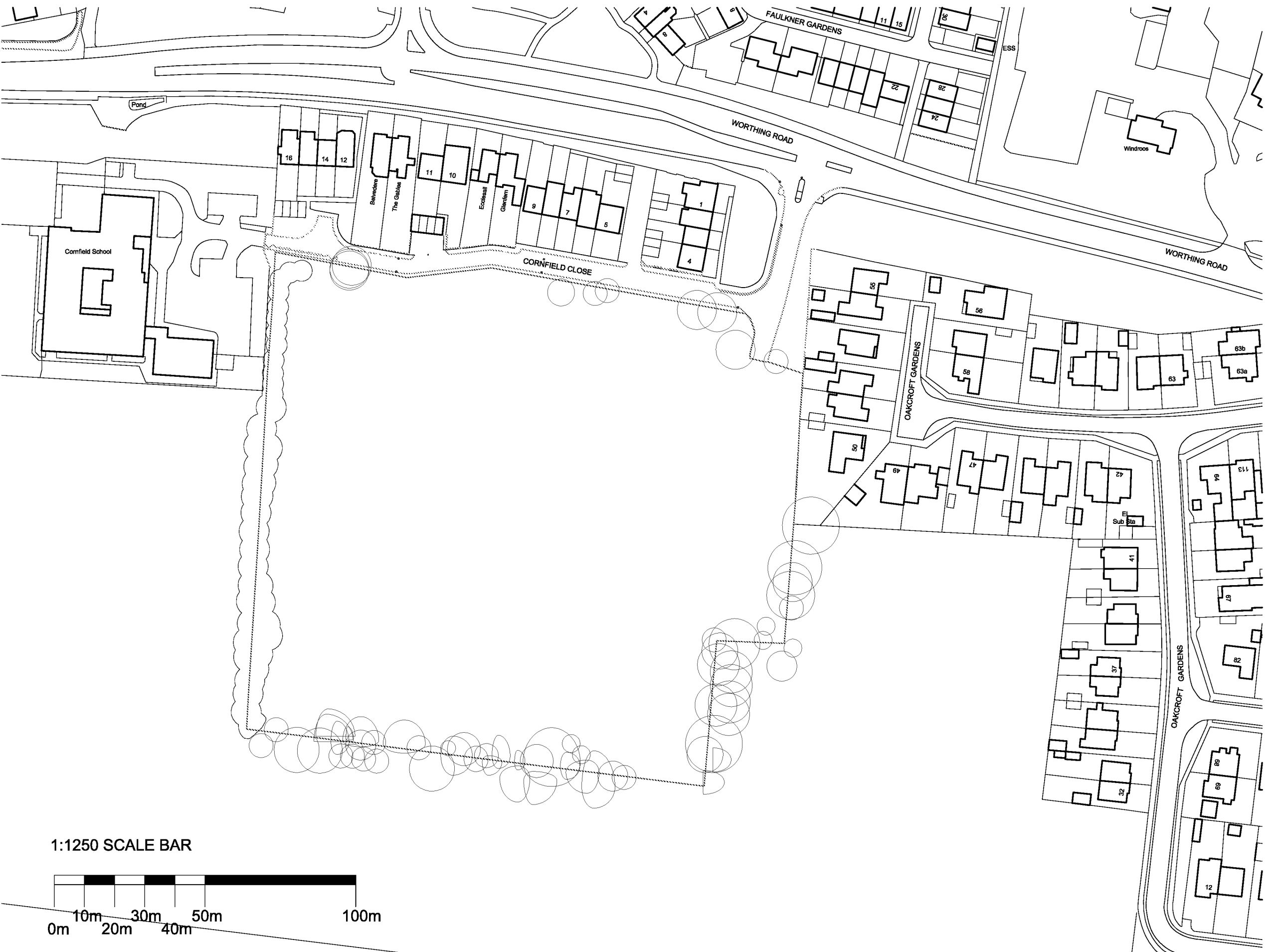
Flood Risk & Drainage

- 6.67. The NPPF seeks to ensure that development is not located within areas at risk of flooding and that development proposals do not increase the risk of flooding elsewhere.
- 6.68. Policy W DM2 seeks to restrict development within areas at risk of flooding unless a number of criteria have been satisfied, whilst Policy W DM3 seeks to ensure that all development proposals incorporate sustainable drainage sSchemes (SuDS).
- 6.69. Given that the site is located within flood zone 1 and proposed development has been designed to ensure that surface water is appropriately managed, it is considered that the proposals full comply with the NPPF and the provisions of Policies W DM2 and W DM3.

7. Conclusion

- 7.1. The proposed development represents a high quality residential-led development that will assist in addressing immediate local housing needs that have been identified by Arun District Council (ADC). The site is also in a highly sustainable location which is close to a number of local services and bus stops.
- 7.2. The site is not subject to any policy designation and is located within the identified built-up area boundary of Littlehampton, as defined on the adopted proposals maps. In addition, the site is located within the Fitzalan Corridor within the Littlehampton Neighbourhood Plan, representing a preferred location for development.
- 7.3. As an available HELAA site, the application site has been included within ADCs latest housing 5-year land supply calculations, contributing to the council's ability to meet their housing requirement over the next five years.
- 7.4. The proposal provides suitable vehicular and pedestrian access points and the design of the layout has sought to ensure that the existing landscape which surrounds the site has been respected. This planning application would:
- Make a significant contribution to much needed housing delivery in the District and wider area;
 - Create a high quality residential development that has a positive identity;
 - Help deliver new affordable housing;
 - Provide a number of biodiversity enhancements; and
 - Provide a high quality of residential amenity for future occupiers.
- 7.5. In light of the information and analysis set out in Planning Statement, the accompanying Design and Access Statement and other supporting documents submitted with the planning application, there are no planning related reasons why Arun District Council should not approve the proposed development. It is therefore respectfully requested that the proposed development is supported and that planning permission is granted.

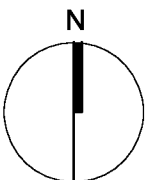
Appendix A – Location Plan



This drawing is not to be scaled. The architect is to be informed of any errors before work proceeds. The general contractor is responsible for checking all dimensions

Notes

For hard and soft landscaping and roadway finishes please refer to Landscape Architect and Highways Engineer's drawings.



0	2018.10.24 Issued for Planning	TW	SH
Rev	Date + notes	Drawn	Chkd

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Project
Land south of Cornfield Close
Littlehampton

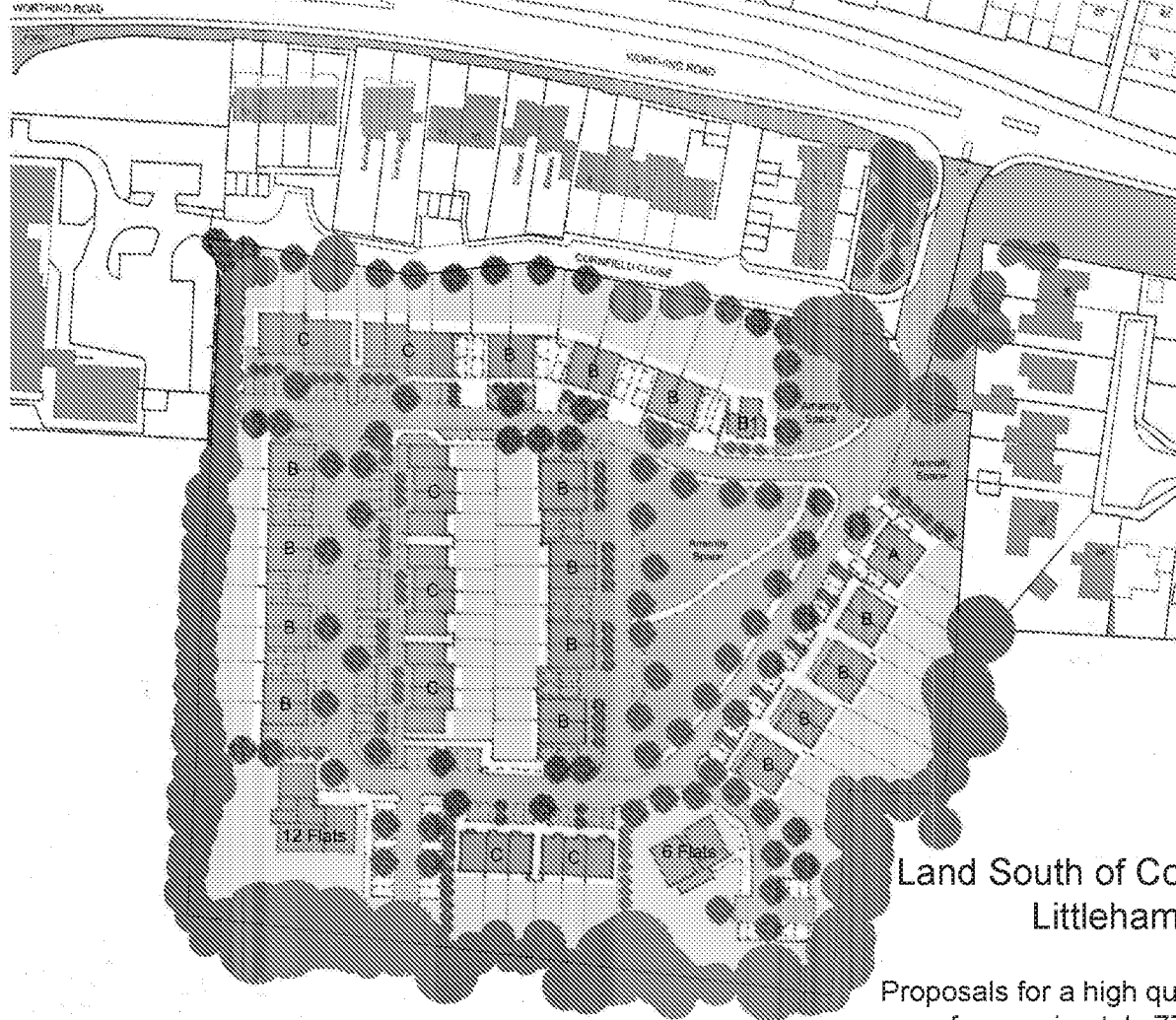
Drawing
Site Location Plan

Job Ref	Dwg No	Revision	
P0516	1000	01	
Scale(s)	Size	Drawn	Chkd
1:1250@A3	A3	TW	SH

Status
Planning

Appendix B – Public Consultation Leaflet

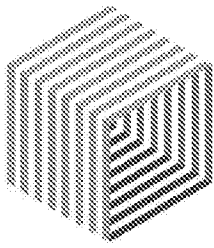
Thakeham Client Ltd
Thakeham House
Summers Place
Stane Street
Billingshurst
RH14 9GN



Land South of Cornfield Close
Littlehampton

Proposals for a high quality development
of approximately 77 new homes,
incorporating a mix of 1, 2 and 3 bedroom
properties within landscaped surroundings.





On behalf of **CLARION**
HOUSING GROUP

**Land South of Cornfield Close
Littlehampton**
Public Consultation

This leaflet has been prepared to tell you about the vision and most importantly, to ask for your ideas, thoughts and suggestions regarding the development proposals which are currently being progressed for Land South of Cornfield Close, Littlehampton.

We have provided an overview of the proposals within this leaflet and are now consulting the local community on their views in advance of submitting a planning application. You can provide your comments on the scheme by writing to the address provided, or by returning the free of charge pre-paid slip on this leaflet.

Alternatively you can contact us by e-mail at:
consultation@thakeham.com

Note: We will retain your information for a 2 year period, until October 2020.



About Clarion

Clarion Housing Group comprises the country's largest housing association; a property development company, a charitable foundation and a maintenance contractor.

The Group's housing association, Clarion Housing, is committed to providing good customer service to all its residents and to maintaining its homes to a good standard - investing significantly in improving them each year.

Its development target is to build 50,000 new homes over 10 years and the Group will invest £13 billion on meeting and delivering on this target. Two thirds of the programme will be affordable and developed by Clarion Housing, while homes for private sale are delivered and marketed through development company Latimer by Clarion Housing Group. The proceeds from sales are invested in our social purpose.

The charitable foundation, Clarion Futures, will invest £150 million over ten years to deliver one of the largest social investment programmes in the country. Priorities are work and training; money management and young people.

The Proposals

The site is located to the south of Cornfield Close, immediately south east of Cornfield School and north of Littlehampton Academy, and comprises the former Daisyfields Caravan site.

A proposed site layout plan is shown on the reverse of this leaflet, and proposes the demolition of the existing buildings, and erection of approximately 77 new homes with sizes and styles to meet a wide range of local housing needs and demands. This site is within the Fitzalan corridor, which is identified as the focus for housing delivery within the Littlehampton Neighbourhood Plan.

The proposals represent a comprehensive approach to the development of this site, encouraging the efficient use of the land. This approach has allowed the scheme to imaginatively evolve, retaining the existing mature vegetation around the perimeter of the site and incorporating a substantial amount of public open space alongside associated landscaping. This provides space for recreation, enhances the verdant character of the area and the quality and outlook for new residents, whilst also making a significant contribution to housing in the area.

Feedback

Thakeham Client is a main contractor working in partnership with Clarion to progress this scheme through planning and construction.

Thakeham and Clarion both pride themselves on how they engage with local communities when progressing development proposals. We therefore welcome your comments throughout the application process and during any future construction phase. We are expecting to submit a Full planning application later this Autumn, and as a neighbouring resident we would like to engage with you directly. We welcome any comments that you may have, therefore please contact us by e-mail, post or by returning this pre-paid slip by 20th September 2018.

Once the planning application is registered by Arun District Council you will also be able to submit formal comments, which will be considered by the Council when determining the planning application.

Do you have any comments on the scheme layout and indicative building design shown on the reverse of this leaflet?

.....
.....
.....
.....
.....

Do you consider the delivery of 2 and 3 bedroom family homes will make a positive contribution to housing need in the local area?

.....
.....
.....
.....

Would you like to be updated in relation to the proposals?

YES / NO (please circle)

Name:.....
Address:.....
.....
E-mail:.....

Thakeham Client Ltd, Thakeham House, Summers Place,
Stane Street, Billingshurst, RH14 9GN

Appendix C – Accommodation Schedule (NDSS compliance)

P0516 8000
Accommodation Schedule - Land south of Cornfield Close, Littlehampton
Rev 02 2018.11.12 Unit areas and NDSS area requirements added. Issued for information.

Houses	Plot No	Accommodation		House GIA m²	NDSS min GIA m²
	1	3B5P	Affordable	94.4	93
	2	3B5P	Private	93.4	93
	3	3B5P	Private	93.4	93
	4	3B5P	Private	93.4	93
	5	3B5P	Private	93.4	93
	6	3B5P	Private	93.4	93
	7	3B5P	Private	93.4	93
	8	2B4P	Affordable	79.5	79
	9	2B4P	Affordable	79.4	79
	10	2B4P	Affordable	79.5	79
	11	2B4P	Affordable	79.4	79
	12	2B4P	Private	79.4	79
	13	2B4P	Private	79.5	79
	14	2B4P	Private	79.5	79
	15	2B4P	Private	79.4	79
	16	3B5P	Private	93.4	93
	17	3B5P	Private	93.4	93
	18	3B5P	Private	93.4	93
	19	3B5P	Private	93.4	93
	20	3B5P	Private	93.4	93
	21	3B5P	Private	93.4	93
	22	3B5P	Private	93.4	93
	23	3B5P	Private	93.4	93
	24	2B4P	Private	79.4	79
	25	2B4P	Private	79.5	79
	26	2B4P	Private	79.5	79
	27	2B4P	Private	79.4	79
	28	2B4P	Private	79.4	79
	29	2B4P	Private	79.5	79
	30	2B4P	Private	79.5	79
	31	2B4P	Private	79.4	79
	32	2B4P	Private	79.4	79
	33	2B4P	Private	79.5	79
	34	2B4P	Private	79.5	79
	35	2B4P	Private	79.4	79
	36	3B5P	Private	93.4	93
	37	3B5P	Private	93.4	93
	38	3B5P	Private	93.4	93
	39	3B5P	Private	93.4	93
	40	3B5P	Private	93.4	93
	41	3B5P	Private	93.4	93
	42	3B5P	Private	93.4	93
	43	3B5P	Private	93.4	93
	44	2B4P	Affordable	79.5	79
	45	2B4P	Affordable	79.5	79
	46	2B4P	Affordable	79.5	79
	47	2B4P	Affordable	79.5	79
	48	2B4P	Affordable	79.5	79
	49	2B4P	Affordable	79.5	79
	50	3B5P	Private	93.4	93
	51	3B5P	Private	93.4	93
	52	3B5P	Private	93.4	93
	53	3B5P	Private	93.4	93
	54	3B5P	Private	93.4	93
	55	3B5P	Private	93.4	93
	56	3B5P	Private	93.4	93
	57	3B5P	Private	93.4	93
	58	2B4P	Private	80	79
	59	3B5P	Private	94.6	93

Apartments	Plot No	Block	Accommodation		Flat GIA m²	NDSS min GIA m²
Block A	60	A	2B4P	Private	70.1	70
	61	A	2B3P	Private	61.3	61
	62	A	2B4P	Private	70.1	70
	63	A	2B3P	Private	61.3	61
	64	A	2B4P	Private	70.1	70
	65	A	2B3P	Private	61.7	61
Block B	66	B	2B4P	Affordable	70.1	70
	67	B	1B2P	Affordable	50.5	50
	68	B	1B2P	Affordable	50.4	50
	69	B	2B3P	Affordable	61.1	61
	70	B	2B4P	Affordable	70.1	70
	71	B	2B3P	Affordable	61.2	61
	72	B	2B3P	Affordable	61.1	61
	73	B	2B4P	Affordable	70.1	70
	74	B	2B3P	Affordable	61.2	61
	75	B	2B3P	Affordable	61.1	61
	76	B	2B4P	Affordable	70.1	70
	77	B	2B3P	Affordable	61.2	61