



PLANNING, DESIGN & ACCESS STATEMENT

LAND SOUTH OF ELDON WAY, LITTLEHAMPTON, WEST SUSSEX, BN17 7HE

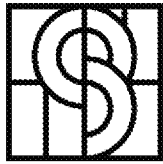


**SMITH
SIMMONS**
& PARTNERS

PLANNING, DESIGN & ACCESS STATEMENT
LAND SOUTH OF ELDON WAY, LITTLEHAMPTON, WEST SUSSEX, BN17 7HE

CONTENTS

1.0	INTRODUCTION	2
2.0	THE SITE AND ITS PLANNING HISTORY	3
3.0	CONSIDERATIONS FOR THE DEVELOPMENT PROPOSAL	6
4.0	RELEVANT PLANNING POLICIES	16
5.0	CONCLUSION AND RECOMMENDATION	28



1.0 INTRODUCTION

- 1.1 This Planning, Design & Access Statement has been prepared on behalf of Littlehampton Town Council and is submitted alongside a suite of drawings and specialist reports in support of a full planning application which is made for the *Erection of a Youth and Community Centre, Multi Use Games Area (MUGA), Cycle Store, Bin Store, vehicular access and altered pedestrian access with an associated scheme of hard and soft landscaping* on Land South of Eldon Way, Littlehampton, West Sussex, BN17 7HE.
- 1.2 The proposed scheme of development includes for the relocation of the existing play equipment and replacement with a Youth and Community Centre, MUGA, cycle and bin stores, vehicular and pedestrian access with an associated scheme of hard and soft landscaping. The proposals include the provision of 10. car parking spaces, one disabled car space, a space for a minibus and 8no. cycle parking spaces. The overarching aim of the proposal is to make more efficient and effective use of this sustainably located, and heavily underused open space and in turn, provide the local community with a much-needed replacement multi-functional Youth and Community Centre and associated recreational facilities that will be fit for the 21st century and serve locals for many years to come.
- 1.3 Plans and other information submitted in support of the proposed scheme comprise:
- Proposed Scheme Drawings
 - Noise Impact Assessment – PJA
 - Landscape Design Strategy & Masterplan - Lizard
 - Preliminary Ecological Appraisal – ESL
 - Flood Risk Assessment & Drainage Strategy – Bright Plan Civils
 - Arboricultural Survey – ESL
 - Lighting Strategy – Designs for Lighting
 - Transport Statement – Bright Plan

2.0 THE SITE AND ITS PLANNING HISTORY

The Site

- 2.1 This Planning, Design & Access Statement has been prepared on behalf of Littlehampton Town Council. It accompanies a detailed planning application which is made for the erection of a Community Centre, Multi Use Games Area (MUGA), Cycle Store, Bin Store with an associated scheme of hard and soft landscaping on Land South of Eldon Way, BN17 7HE.
- 2.2 The site lies on the south side of Eldon Way and within the Built-up Area Boundary and is designated as Existing Open Space. It does not lie within the setting of any heritage assets although a designated Economic Growth Area wraps around its north, west and south boundaries. Although the northern half of the site does not lie within an area which is at risk of flooding, it is noted that the majority of the southern half is within Flood Zones 2 and 3.

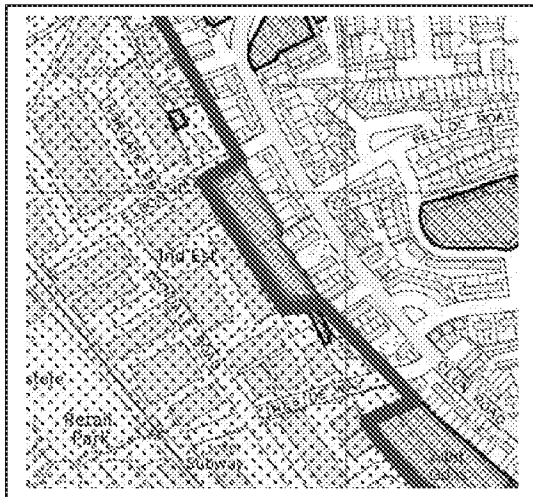


Fig 1 - Proposals Map Extract

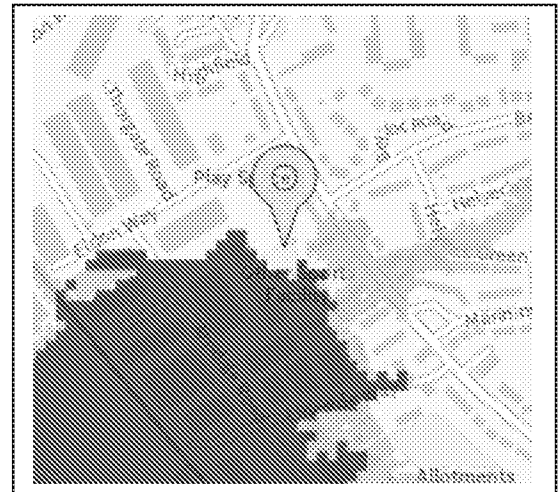


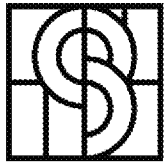
Fig 2 - Flood Map Extract

- 2.3 The site currently comprises an area of land which is roughly rectangular in shape and measures circa 0.6 of a hectare. Its northern half is level ground which is laid to grass and also includes for a fenced enclosure which provides children's swings. The southern half provides a BMX track so is undulating land. It is separated from the northern half by fencing.

- 2.4 To the north of the site on the opposite side of the Eldon Way is the site of the current Keystone Community Centre. The site is predominantly grassed with a small area of hardstanding near the vehicular entrance. A MUGA also exists to the rear of the building.
- 2.5 Immediately west and south of the site are units located within the Lineside Industrial Estate. Those industrial units which run along the application site's western boundary are at least in part, screened from view by a line of mature trees. The site's eastern boundary is marked by a close-boarded fence and sporadic trees/hedges. On the other side of the fence are the rear gardens which serve a number of two-storey terraced dwellings located in Clun Road.

Planning History

- 2.6 According to the Council's online planning register, the only planning history that relates to the site is application reference LU/250/96 which represents an application which was made for the construction of a BMX track. Planning permission was granted in February 1997.
- 2.7 Littlehampton Town Council and Arun District Council both have long term strategic objectives to deliver improved community facilities in Wick. These commitments are set out in the following Policy documents:
- Littlehampton Town Council Strategic Aims and Objectives: "To agree with partners a formal programme to replace Project 82, potentially with a new facility at or near the Keystone Centre".
 - Littlehampton Neighbourhood Plan "The retention, improvement and expansion of the Keystone Centre as a valued community facility for young people in the Town" (Policy 14).
 - Arun District Council Corporate Plan and Vision 2020:
 - Your Council! Services: serving our communities well by delivering the best services we can afford.
 - If you and your family need help: Supporting those people in our district who need our help.
 - Offering an improved customer experience.
 - Building better relationships with other organisations and the community.
- 2.8 Throughout 2018 the Town Council held exploratory discussions with the District Council and community groups to identify proposals for a youth hub in Wick. In the latter part of that year a way forward was agreed by both authorities which has seen the Town Council taking the lead on this project. Public consultation in 2019 supported the creation of a fully accessible, modern, and flexible building and upgrading the external leisure facilities in the



**SMITH
SIMMONS**
& PARTNERS

PLANNING, DESIGN & ACCESS STATEMENT

LAND SOUTH OF ELDON WAY, LITTLEHAMPTON, WEST SUSSEX, BN17 7HE

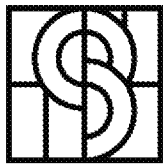
area. Both authorities have now confirmed their commitment to this project and by continuing to work in partnership this proposal will not only meet the strategic objectives of both authorities, it will also deliver significantly improved community facilities in the deprived ward of Wick, Littlehampton.

- 2.9 Lastly, notwithstanding the above, it should be noted that in support of the current proposals, a further community engagement exercise will be undertaken by Littlehampton Town Council within the next couple of weeks. Given the scheme has responded to comments made in the earlier consultation exercise, it is anticipated that the current proposals will be well received.

3.0 CONSIDERATIONS FOR THE DEVELOPMENT PROPOSAL

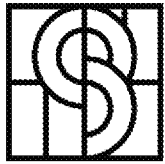
Land Use

- 3.1 The site is located within the built-up area boundary and is designated as existing open space on Arun Local Plan 2011-2031 Policy Map 4 and occupies a highly sustainable location close to a large residential area and employment uses.
- 3.2 NPPF paragraph 92 promotes achieving healthy, inclusive and safe places by, for example, promoting social inclusion, design out crime and enabling and supporting healthy lifestyles, especially where this would address identified local health and well-being needs. Furthermore, NPPF paragraph 93 states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should amongst other things, plan positively for the provision and use of shared spaces, community facilities.
- 3.3 Of particular relevance to the assessment of this application is NPPF paragraph 99 which states that existing open space should not be built on unless:
- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 3.4 These overarching NPPF paragraphs are effectively echoed in Local Plan Policies HWB SP1 (Health & Wellbeing) and OSR DM1 (Open Space, sport & recreation). In short, policy HWB SP1 requires all development to be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities by, for example, creating multi-use community buildings that reduce the need to travel by providing housing, services and employment in close proximity to each other. In support of this, policy OSR DM1 states that existing open space, outdoor and indoor sport, community, arts and cultural facilities should not be built on or redeveloped unless the tests in NPPF paragraph 99 are met.
- 3.5 Notwithstanding the clear relevance of the above national and local level planning policy approach to the development of existing open space, absolutely crucial to the proper assessment of this application is the need to appreciate both (i) the current



provision/condition of the Keystone Centre which as noted above, occupies the site immediately opposite on Eldon Way and (ii) the current land use designation of that site.

- 3.6 On the first point, a site visit will confirm that the existing community centre is quite simply, no longer fit for purpose. By virtue of its age, construction and layout, it does not draw users to it and consequently fails to appear attractive to most of the local community. It is also thermally inefficient, cannot be easily adapted for users and offers only a limited space. Furthermore, the orientation of the building, coupled with the MUGA located to the rear, also make the existing site unattractive to users in the sense that it provides opportunity for crime.
- 3.7 In contrast, the proposed replacement centre has been designed to provide a significantly more usable and adaptable internal space that will provide users with a far greater range of opportunities for activities/functions than is currently the case. It will have an attractive appearance that will in turn, set a new standard for design in the locality and will also be constructed using the latest sustainable construction technologies. Overall, the proposal will provide a highly inviting community centre that will serve the community for many years.
- 3.8 On the second point, it is important to recognise that the site which is home to the existing community centre has been identified on the Arun Local Plan 2011-2031 Policy Map 4 (which was adopted in September 2018), as forming part of a wider Economic Growth Area. It is noted however, that the existing MUGA has not been included in this planned land use designation but instead, remains as designated existing open space in the Local Plan.
- 3.9 Accordingly, it is abundantly clear that as Arun District Council have, recently allocated the site of the existing community centre for future economic development, it has been accepted that the current provision of a community building and associated outdoor space is 'expected' to be lost without there having been any provision made by Arun District Council for a replacement facility in the local area. It is also important to appreciate that should the existing site be redeveloped for economic purposes, the MUGA would effectively be left landlocked.
- 3.10 It is with all of the above in mind that the proposed development of land which is designated as existing open space is considered acceptable in principle as it would successfully address identified local health and well-being needs and in doing so, provide all members of the local community with social, recreational and cultural facilities far superior to those which exist.



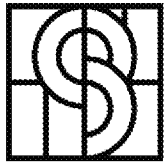
- 3.11 In this respect, the proposals would to differing degrees, accord with both parts b and c of Local Plan Policy OSR DM1 as (i) the loss resulting from the proposed development would be replaced by a significantly better provision of open space, outdoor and indoor sport, community arts and cultural facilities, in this sustainable location and (ii) the development is for alternative open space, sports, community, arts or cultural provision, the needs for which clearly outweigh the loss of this heavily under-used area of existing, soulless open space.

Design and Appearance

- 3.12 The architectural approach proposes a single storey building of simple design with an interesting and contemporary appearance and a materials palette comprising brick walls with timber cladding, powder-coated aluminium fenestration and an aluminium standing seam roof. The building also incorporates sustainable construction techniques. The site is flanked by an industrial estate and residential properties so those buildings which exist in the immediate vicinity are of mixed appearance. The proposed building will therefore not appear at odds with surrounding buildings. Both the cycle and bin stores will be of brick construction.



Fig 3 - View of Main Entrance



- 3.13 The design and appearance of the proposed scheme of development is therefore considered to successfully accord with paragraph 120 of the NPPF, Local Plan Policies SD SP2, D SP1 and D DM1 as well as the relevant sections of the Arun District Design Guide.

Scale

- 3.14 The proposal includes for the introduction of a community centre, a MUGA and cycle and bin stores. Given the mixed nature and scale of development in the locality, the proposed single storey building is considered entirely appropriate to its location in terms of its scale.
- 3.15 The site area measures 0.6 of a hectare. The Gross Internal Area (GIA) proposed for the community centre is 332m². The proposed development will provide a community centre on a single level. In terms of its accommodation, it will offer a main hall, an activity room, an office, a meeting room, break-out space, storage space, a kitchen, toilets and plant room. The centre will also benefit from some rear outdoor space which will allow for flexible uses.
- 3.16 It is considered the internal and external design/layout of the community centre has resulted in a well-proportioned scheme that will sit well within the site and simultaneously provide future users with spaces which will allow for a wide variety of activities and functions. Furthermore, the density of development proposed would be consistent with surrounding development in the locality and in turn, provide much needed new community centre and ancillary development for all members of the local community. Accordingly, the proposal is considered to successfully accord with Local Plan policies D SP1, D DM1, ECC SP1 and SP2.

Layout

- 3.17 The proposed layout aims to make an efficient and effective use of the open land available. A new vehicular access will be created in the site's northern-most corner, close to where the site's existing gated entrance is located. The access will lead to the car park. A gated, side access which will lead to an area which will remain undeveloped is also proposed to run along the eastern side of the community centre. The site's existing pedestrian path will be altered so as to provide a separate access into the site. It will lead to the entrance courtyard and run further into the site in order to enable users to access the centre's outdoor spaces, the MUGA and the existing BMX which is located within the southern half of the site.

- 3.18 The proposed location and orientation of the community centre, MUGA and replacement play area have all been given very careful consideration in order to adequately safeguard neighbouring residential amenities which exist along the site's eastern boundary. Specifically, it should be noted that no windows or outdoor amenity spaces are proposed for the community centre's east elevation or in close proximity to its eastern boundary.
- 3.19 Furthermore, it is important to appreciate that both the replacement play area and proposed MUGA will be located close to the site's western boundary where on the other side, only industrial units exist. The proposed layout will therefore accord with Policies D DM1 and QE SP1 of the Local Plan as well the relevant sections of the Arun Design Guide.



Fig 4 - Proposed Site Plan

Access and Parking

- 3.20 Visitors to the community centre and MUGA will have access to 11no. off-street car parking spaces with one of these being suitable for use by a disabled person. A designated space will also be provided for a minibus. For users of the site who will not be travelling either by car

or on foot, a cycle store will be provided within the community centre's entrance courtyard. The store will be able to accommodate a maximum of 8no. cycles at any given time.

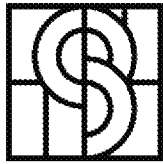
- 3.21 The access drive and parking areas will be constructed using permeable block paving. The number of car and cycle spaces proposed for the development is in line with Arun District Council and West Sussex County Council's parking standards.
- 3.22 Given the modest scale of the proposed development, and also as the site lies within easy access of established public transport services, it is considered that an unacceptable level of vehicular traffic that would not be generated that would overburden the highway network. Accordingly, the proposal meets with NPPF paragraph 110 and Local Plan Policy T DM1.

Amount and Use

- 3.23 The amount of development is appropriate when considered in the context of the surrounding development in the locality and would crucially, make far more efficient and effective use of this heavily underused open space with a combination of improved outdoor recreational facilities and purpose-built youth and community centre. In this respect, the proposal accords with NPPF paragraphs 119 and 130 and Local Plan Policies SD SP2 and D SP1.

Flood Risk and Drainage

- 3.24 To assess the impact of the proposed scheme of development on the site's risk of flooding, a flood risk assessment was commissioned. It summarised its findings by stating that as the site lies within Flood Zone 1, it is consequently at very low risk of surface water flooding.
- 3.25 It further proposed that post-development surface water run-off will be managed through sustainable drainage measures, with the installation of permeable surfacing, free-draining surfacing and a geocellular soakaway, in order to avoid any surface water flooding on site. The wastewater from the proposed development will discharge to the public foul sewer network, with connection arrangement to be confirmed subject to site investigation.
- 3.26 The assessment concluded that the completion of the development will not increase flood risk either on or off the site and in this respect, the development is considered suitable with



regards to flood risk and surface water drainage. The proposed scheme of development will therefore meet with the requirements of Local Plan Policies ECCC SP1 and W DM3.

Noise

- 3.27 To assess the impact of noise 'pollution' generated by the proposed scheme of development on noise-sensitive receptors (specifically, residential properties) in the surrounding area, once it is fully operational, a noise impact assessment was commissioned. The most noise risk is considered to occur from external play on the new MUGA, and from plant noise generated by the proposed air conditioning system.
- 3.28 The assessment concluded that noise from the MUGA should mean an acceptably low level of adverse impact on residents. This view is supported by the fact that the application site is currently used as a community area with a playground, a field, and a climbing frame, and also includes for the BMX track, so to some extent noise created from these activities would not be too dissimilar to those that would be likely to occur with the new MUGA. Notwithstanding this, the assessment recognises that meeting suggested noise level criteria does not automatically rule out an adverse impact or stem the possibility of complaints, as the perception of noise is relatively subjective. For this reason, a suitable Noise Management Plan is recommended to be put in place and adhered to.
- 3.29 In respect of the potential for noise pollution from the air conditioning system, the assessment accepts that full details of the system were not available at the time of writing but suggests that if mitigation is required, it should be relatively easy to implement, i.e. by moving the units away from the eastern elevation, currently, the closest position possible to the residents, to position them further away or alternatively, by enclosing them within a small screen or ventilated casing or choosing to install units with a lower source sound power level. Accordingly, the proposal satisfies Local Plan Policies QE SP1 and QE DM1.

Lighting

- 3.30 To assess the impact of the proposed scheme of development on sensitive receptors at neighbouring sites, light consultants were commissioned to develop a sensitive lighting strategy with the aim of minimising the impacts of lighting on potentially sensitive receptors.

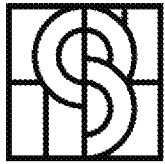
- 3.31 Compliance with the lighting strategy will allow a safe and sensitive level of light to enable the usage of the proposed development at night, whilst limiting obtrusive light to a negligible level and minimise potential for light spill onto site boundaries. It notes that whilst the lighting level within the site will inevitably increase, the lighting strategy proposed will limit the potential for significant levels of obtrusive light to leave the site. The impacts associated with lighting for the proposed development are likely to be of negligible significance, as lighting levels outside the Application Site are unlikely to increase, and lighting levels outside the Application Site are unlikely to increase beyond the limitations for an E3 Environmental Zone.
- 3.32 The strategy states that lighting will be applied minimally, and controlled such that increases in lighting levels do not adversely affect nearby residential amenity. In this respect, the levels of light spill identified are highly unlikely to exceed limitations set out in the Institution of Lighting Professionals guidance document GN01:2021 for an E3 environmental zone. The proposal will therefore accord with Local Plan Policies QE SP1 and QE DM2.

Arboriculture

- 3.33 To assess the impact of the proposed scheme of development on the site's existing tree cover, an arboricultural survey (incorporating Tree Constraints and Protection Plan) was commissioned. The survey identified 8 trees and 4 tree groups within the development area. To facilitate the proposal, it will be necessary to remove 3 of the trees and 1 of the groups of trees – all of which have been identified as being of low quality (Category C).
- 3.34 Notwithstanding the insignificant value of the trees/groups of trees that are proposed for removal, the assessment proposes that 15 trees of species equal to or greater native biodiversity value are to be planted to replace those felled to facilitate the development. The proposed scheme of development is therefore considered acceptable in arboricultural terms. In this respect, the proposal is in line with NPPPF paragraph 130 and Local Plan Policies D DM1 and ENV DM4.

Ecology

- 3.35 To assess the impact of the proposed scheme of development on the site's ecological qualities, a Preliminary Ecological Appraisal was commissioned. This established that the species poor amenity grassland which covers the vast majority of the site has no potential



to support protected species and is therefore considered to be of low ecological value. It did however, note that the site's corner contain some small patches of scrub which have some potential to support nesting birds.

- 3.36 Notwithstanding the appraisal's broad findings, it sets out mitigation measures considered necessary to avoid and reduce the impacts of the development on the site's ecology and recommends that these are incorporated into a planning condition. In a similar vein, the appraisal also sets out enhancement measures for biodiversity with the aim of resulting in a net ecological gain for the site. In summary, the ecological appraisal concluded that providing the recommended mitigation and enhancement measures are adhered to, no ecological constraints have been identified which should prevent the proposed scheme of development. Accordingly, the proposal meets with NPPF paragraph 130 and Local Plan Policy ENV DM5.

Landscaping

- 3.37 To complement the proposed scheme of development, it was considered imperative to commission the development of a Landscape Design Strategy. The Strategy was informed by a stakeholder engagement meeting with officers from both Arun District Council and Littlehampton Town Council; a desktop study, and a site visit carried out in June 2021. An extract of the Landscape Strategy Masterplan is included below.
- 3.38 The Landscape Design Strategy recognises that its primary objective is to create an attractive and flexible community space to benefit a wide range of users. The proposed strategy provides extensive detail on how the scheme's hard and soft landscaping elements will be successfully integrated and also identifies a number of opportunities for soft landscaping which in turn, will serve to significantly enhance the site's ecological qualities and protect the site's boundaries with neighbouring properties. In this respect, the proposals is in line with both NPPF paragraph 98 and Local Plan Policy D SP1.



Fig 5 - Landscape Strategy Masterplan

4.0 RELEVANT PLANNING POLICIES

National Planning Policy Framework 2021

- 4.1 Paragraph 8 of the National Planning Policy Framework (NPPF) states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives) - these being the economic, social and environmental objectives.
- 4.2 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking, this means:
- approving development proposals that accord with an up-to-date development plan without delay;
 - or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or
 - any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 4.3 Paragraph 92 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other -- for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion -- for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas; and

- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

4.4 Paragraph 93 states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

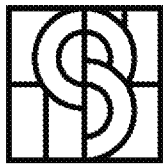
4.5 Paragraph 98 states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

4.6 Paragraph 99 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- d) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- e) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- f) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

4.7 Paragraph 100 states that planning policies and decision should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

- 4.8 Paragraph 110 states 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;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - d) and 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.
- 4.9 Paragraph 119 states that 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.
- 4.10 Paragraph 130 states that planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangements of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.



- 4.11 Policy SD SP1 (Sustainable development) of the Arun Local Plan states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland).
- 4.12 Policy SD SP2 (Built-up Area Boundary) 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.
- 4.13 Policy D SP1 (Design) states that all development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development.
- 4.14 Policy D DM1 (Aspects of form and design quality) states that when considering any application for development the Council will have regard to a number of aspect. Those considered most relevant to the proposed scheme of development comprise:

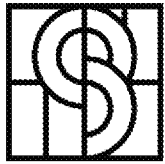
1. Character

Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.

2. Appearance/attractiveness

Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.

3. Impact



Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.

4. Innovation

Raise standards of design by embracing appropriate innovative design, new technologies and construction techniques, where a development proposal has the potential to do so.

5. Adaptability

Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.

6. Crime prevention

Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating buildings and play areas along public routes and spaces, and making a clear division between private and public land to foster a mutual protection through territorial belonging. With respect to crime prevention, regard shall be had in particular to the document 'Secured by Design' and the 'Safer Places - The Planning System and Crime Prevention'.

7. Trees and woodland

All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.

8. Solar gain

Within the constraints of the site and local context development proposals should, maximise sunlight and passive solar energy. Ideally development should be positioned (within a 15-20 degree margin) broadly south, with streets having an east-west pattern.

9. Public realm

Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.

10. Layout - movement

Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open spaces, facilities and public transport. Development schemes should carefully consider walking and cycling as an integral part of the overall design concept.

11. Layout - legibility

Deliver or contribute to the ease of navigation within a new or existing development scheme through use of focal points (landmarks, gateways, vistas, corner buildings, active edges, existing topography), and/or a variety of detail within the public realm (sculpture, planting, street furniture, building materials, building detail, signage).

14. Scale

The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement.

15. Aspects of form and design quality

Development should also comply with the Arun District Council Design Guide.

- 4.15 Policy ECC SP1 (Adapting to climate change) states that the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding; water stress; health impacts as a result of extreme temperatures and a decline in the quality of habitats and richness of biodiversity.

In order to achieve this, development must be designed to take account of the following issues:

- a. Location (in relation to flood risk and vulnerability to coastal erosion);
- b. Water efficiency;
- c. Shade, cooling, ventilation, solar gain;
- d. Connectivity to the green infrastructure network;
- e. Layout and massing;
- f. Resilience of buildings and building materials to extreme weather events; and
- g. Capacity of drainage systems and incorporation of Sustainable urban Drainage Systems (SUDS)

4.16 Policy ECC SP22 (Energy and climate change mitigation) states that all new residential and commercial development (including conversions, extensions and changes of use) will be expected to be energy efficient and to demonstrate how they will:

- 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 supply systems, for example small scale renewable energy systems such as solar panels

In assessing the achievement of these standards the Council will consider: Site constraints; Technical viability; Financial viability; and Delivery of additional benefits.

4.17 Policy HWB SP1 (Health & Wellbeing) states that all development shall be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities. In particular regard shall be had to:

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

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

4.18 Policy OSR DM1 (Open Space, sport & recreation) states that existing open space, outdoor and indoor sport, community, arts and cultural facilities should not be built on or redeveloped for other uses unless:

- a. a robust and up-to-date assessment has been undertaken which has clearly shown the facilities to be surplus to requirements; or
- b. the loss resulting from the proposed development would be replaced by equivalent or better provision of open space, outdoor and indoor sport, community arts and cultural facilities, which will be assessed in terms of quantity and quality and suitability of location; or
- c. the development is for alternative open space, sports, community, arts or cultural provision, the needs for which clearly outweigh the loss.

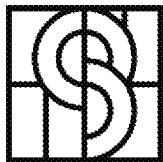
It also states that developments shall have regard to the 'Secured by Design' guidance documents and shall also be consistent with all other Local Plan policies.

4.19 Policy T DM1 (Sustainable Travel and Public Rights of Way) states that proposals for all new development must be located within easy access of established public transport service(s), existing pedestrian and cycle networks, the committed and aspirational cycle networks and the green infrastructure network which links the development with key destinations including places of work, education, leisure and town centres.

4.20 Policy ENV DM4 (Protection of trees) states that Development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order(s), (TPO) identified as Ancient Woodland, in a Conservation Area or contributing to local amenity, will not be damaged or destroyed now and as they reach maturity, unless development:

- a. Would result in the removal of one or more trees in the interests of good arboricultural practice. This shall be demonstrated by the developer following the advice of a suitably qualified person which shall be guided by BS 5837 (2012). Details of any advice received having regard to BS 5837 (2012) shall be submitted, in writing, as part of a planning application; or
- b. Would enhance the survival and growth prospects of other protected trees;
- c. The benefits of the proposed development in a particular location outweigh the loss of trees or woodland, especially ancient woodland.

Proper provision must be made for the protection and management of trees or areas of woodland on-site when undertaking development. A management plan shall be provided as



part of a planning application in accordance with BS 5837 (2012) in order to ensure that trees are adequately protected during development and appropriately maintained in the future. Conditions for the continued protection of trees on sites shall be included in any planning permission given.

Where there are existing trees on or adjacent to a development site, developers shall be required to provide:

- d. Land and tree surveys
- e. A tree constraints plan
- f. An arboricultural impact assessment to include a tree protection plan and arboricultural method statement

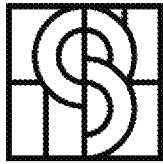
These will ensure that development is planned to take a comprehensive view of tree issues at an early stage in the design process and that development works do not have a negative impact on existing tree

4.21 Policy ENV DM5 (Development and biodiversity) states 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 as 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 habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement.

4.22 Policy W DM3 (Sustainable Urban Drainage Systems) states that to increase the levels of water capture and storage and improve water quality, all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS), appropriate to the size of development, at an early stage of the design process.

Proposals for both major and minor development proposals must incorporate SUDS within the private areas of the development in order to provide source control features to the overall SUDS design. These features include:

- Green roofs
- Permeable driveways and parking
- Soakaways



- * Water harvesting and storage features including water butts.

4.23 Policy QE SP1 (Quality of the environment) states that the Council requires that all development contributes positively to the quality of the environment and will ensure that 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.

The location of existing industrial and commercial uses, including waste management uses, must be taken into consideration when assessing proposals for development sensitive to noise, light, odour and outputs to air. This is to ensure that land allocated for these uses are protected and to ensure that the amenity of new developments and facilities is safeguarded from the impacts of incompatible land uses.

4.24 Policy QE DM1 (Noise pollution) states that developers proposing new noise generating development must seek advice from an early stage to determine the level of noise assessment required. Proposals will need to be supported by:

- a. Evidence to demonstrate that there are no suitable alternative locations for the development.
- b. A noise report which provides accurate information about the existing noise environment, and the likely impact of the proposed development upon the noise environment. The report must also demonstrate that the development meets appropriate national and local standards for noise, as set out in Annex 1 of the Planning Noise Advice Document: Sussex, and any mitigation measures required to ensure noise is managed to an acceptable level.
- c. Evidence to demonstrate that the development will not impact upon areas identified and valued for their tranquillity, including Gaps Between Settlements which are important to the enjoyment of Arun's countryside, its habitats and biodiversity.

4.25 Policy QE DM2 (Light pollution) states that planning permission for proposals which involve outdoor lighting must be accompanied by a lighting scheme prepared according to the latest national design guidance and relevant British Standards publications. Outdoor lighting schemes will be considered against the following criteria:

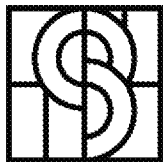
- a. No adverse impact on neighbouring uses or the wider landscape, particularly with regard the South Downs International Dark Sky Reserve designation;
- b. Light levels being the minimum required for security and working purposes;
- c. Minimising the potential glare and spillage; and

d. The degree to which outdoor lighting can be powered by on-site renewable sources.

Where appropriate, the Local Planning Authority will seek to control the times of illumination.

Arun District Design Guide SPD 2021

- 4.26 The Arun District Design Guide was adopted in January 2021 and has been prepared as part of the Council's commitment to secure the highest quality development across the District and aims to provide detailed information that supplements the Local Plan's design policies.
- 4.27 At Part A.05 of Section 1 of the Design Guide, it is recognised that good design has an impact on all aspects of the built and natural environment and goes beyond the appearance of individual buildings and notes that the link between good design and an improved quality of life is well demonstrated and widely understood but not always materialised in developments.
- 4.28 Section 2 sets out a number of overarching design principles which apply to all development types, explaining the masterplanning process and how to integrate a plot with its surroundings. It does however, state that not all of the overarching principles that are set out within Section 2 will necessarily apply to the design of all types of development.
- 4.29 The third and final section of the guide offers further detailed guidance on technical issues associated with specific development types. Chapter P *Infill Development* is considered the most directly applicable to the development that is proposed for the application site.
- 4.30 Chapter P requires all types of infill development to respond positively to the character, appearance and layout of surrounding buildings to ensure that amenity for surrounding and new residents is enhanced. In very broad terms, it is the prevailing character of surrounding buildings and spaces which are expected to inform an appropriate infill design response.
- 4.31 Importantly, it is stated that infill developments, whether in rural or urban environments, must aim to strike a balance between the benefits of more efficient and intense use of development land and preserving the character and local amenities of the site's context.
- 4.32 The type of infill development which best describes the proposals for this site is *Gap Site Development*. The guide states that such developments take place within a gap in a built-up



frontage and recognises that due consideration must be given to effects on the existing character and appearance of the street-scape, and how this may be enhanced or preserved. Furthermore, the guide recognises that not all gap sites will be suitable for development as some may support habitats of high ecological value, serve as open and amenity spaces for the local community, open up key views, or be an integral element of the local townscape.

- 4.33 For this reason, it notes that an initial assessment will therefore be needed to ascertain whether or not the development of a gap site will be acceptable. Should a gap site be deemed suitable for development, the guide states that a number of key design aspects will need to be given careful consideration. These include: building line, building spacing, height, scale and massing, boundary treatment, materials, architectural image and parking.
- 4.34 With the above in mind, the proposals have taken a design approach which adheres to the guidance and in turn, presents a scheme which incorporates all the key elements of good design. Its scale, orientation and layout and appearance successfully respond to its surroundings and the scheme's internal and external spaces will provide all users of the facilities with a particularly high quality of accommodation.
- 4.35 The proposals represent an intelligent form of urban development which is both appropriate to the size of the plot, and which also respects existing local spatial patterns and contribute to the area's eclectic character. The level of accommodation has been designed to suit the intended users of the centre and will not compromise neighbouring residential amenities. It is also important to note that the centre has been designed to be capable of adaption. In summary, the proposals successfully uphold the aims of the Council's design guidance and there is therefore no reason why any objections should be pursued on design grounds.

5.0 CONCLUSION AND RECOMMENDATION

- 5.1 The proposed development of land which is designated in the Local Plan as 'Existing Open Space' is considered acceptable in principle and the proposals have been specifically designed to make far more efficient and effective use of this heavily underused open space with a combination of improved outdoor recreational facilities and purpose-built youth and community centre. As such, the application scheme would successfully address identified local health and well-being needs and in doing so, provide all members of the local community with social, recreational and cultural facilities which will be fit for a 21st century community.
- 5.2 It is vital to recognise that Littlehampton Town Council (the Applicants) have been in discussions with Arun District Council since 2018. These discussions have culminated in Arun District Council agreeing to release this site to make way for a new community centre.
- 5.3 To inform the delivery of a new community centre, a community engagement exercise was undertaken in 2019. This essentially established that all members of the local community recognised that the current provision of community facilities were no longer fit for purpose and urgently needed replacing. It is also important to note that feedback obtained from residents in the immediate vicinity of the centre favoured relocating the community centre.
- 5.4 The proposed scheme of development has since been the subject of extensive pre-application discussions which in turn, have established the acceptability of the design approach. In broad terms, the proposed scheme is considered to successfully relate to its immediate setting whilst safeguarding existing residential amenities on neighbouring plots.
- 5.5 Furthermore, the proposals are supported by a suite of assessments which have given due consideration to the range of other potential impacts that may arise from the development. All of the specialist reports that have been prepared successfully argue that the development of this site to provide community facilities will not have any consequent adverse impacts.
- 5.6 Given the above, it is considered that the proposed scheme of development complies with all relevant national and local level planning policies. The scheme represents an excellent example of intelligently designed, responsive sustainable development and for this reason, we respectfully request that planning permission is granted at the earliest opportunity.