

Town and Country Planning Act 1990

Planning Statement

Land at The Bungalow, Old Mead Road, Littlehampton
Change of use of land for the stationing of 25 no. mobile homes for permanent residential
occupation

ON BEHALF OF

Roman Oak Developments Ltd

PREPARED BY

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November 2017

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Appendix A - Pre-application response dated 5th July 2017



1 INTRODUCTION

- 1.1 This Planning Statement is prepared on behalf of Roman Oak Developments Ltd in support of a planning application for the following:

Change of use of the land for the stationing of 25 no. mobile homes for permanent residential occupation

- 1.2 This Planning Statement sets out the relevant background to assist the planning authority in its determination of the planning application. The statement includes a description of the site and its surroundings, relevant planning history, details of the proposed development, a summary of the planning policy context, and an appraisal of the scheme against all relevant planning considerations.

- 1.3 A second planning application relating to a proposal for up to 24 dwellings has been submitted as an alternative to this scheme.

- 1.4 In addition to this statement, the application is supported by the following documents and plans:

- Planning application forms
- Planning Application Summary
- Design and Access Statement
- Preliminary Ecological Appraisal
- Flood Risk Assessment (incorporating a drainage strategy)
- Landscape Strategy
- Biodiversity Checklist

- Site Plan
- Site Location Plan
- Topographical Survey
- Validation Checklist

2 THE SITE

- 2.1 The application site extends to 1 hectare and comprises a bungalow, sheds and associated residential garden and amenity land.

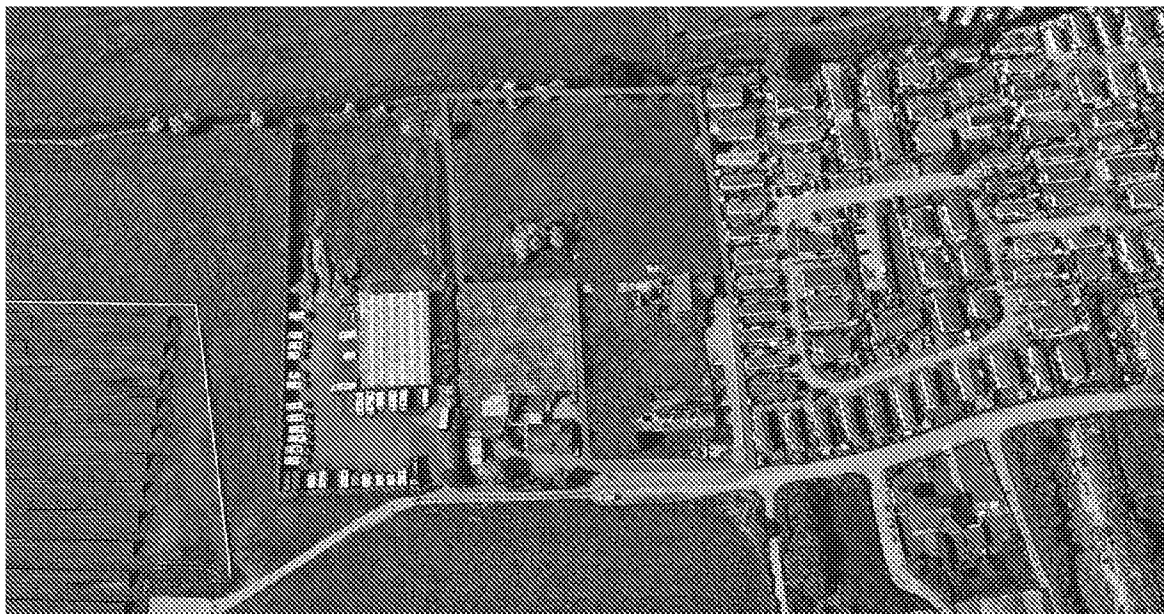


Figure 1: The Site

- 2.2 The site is accessed via Old Mead Road which is privately owned and has sufficient width to allow two cars to pass. A pavement runs alongside Old Mead Road on alternating sides from its junction with Lyminster Road (A284) ending approximately 140 metres from the application site. Old Mead Road predominantly serves residential properties, and also land used for caravan storage and as a solar farm.
- 2.3 To the east of the site lies Thornlea Mobile Home Park which comprises 146 age restricted residential mobile homes. To the south lies Old Mead Road with farmland beyond, part of which is the subject of a recently approved planning application for the change of use of land for the stationing of 7no. residential mobile homes. To the west lies land used for the storage of caravans. To the north runs the Black Ditch with farmland and Lyminster beyond.

- 2.4 The site is located within Littlehampton close to its boundary with Lyminster. Littlehampton has an excellent range of facilities and the proximity of these to the site is shown on the table below. All of these are accessible via a made footpath which starts close to the site on Old Mead Road.

Facility	Details	Distance from site
Schools	Lyminster Primary School	1.2km
	Littlehampton Academy	2.3km
Shops	Morrisons	1.2km
	Wick Street shopping parade	1.4km
Healthcare	Fitzalan Medical	3km
	Oasis Dental Care	1.4km
Community facilities	The Six Bells Public House	160m
	The Wickbourne Community Centre	2.4km
Leisure facilities	Worthing Road Recreation Ground	1.2km
	Littlehampton Swimming and Sports Centre	4.6km
Bus Stops	700 Coastliner, 9 and 602 services in both directions	160m
Railway Station	Littlehampton Railway Station	2.5km

3 THE PROPOSAL

- 3.1 The proposal is for the change of use of land to allow for the stationing of 25 residential mobile homes. All homes would be age restricted to the over 55s and would be laid out in accordance with Model Standards.
- 3.2 It is anticipated that all homes would be two bedroom units measuring 42ft x 20ft (10 units) and 42ft x 20ft (15 units). Each would be provided with one resident's car parking space and a small private garden.
- 3.3 Bins will be provided adjacent to each mobile home and the internal road system would be able to accommodate a refuse lorry.
- 3.4 Low level lighting would be used around the park to provide adequate illumination for residents.
- 3.5 An area for visitor parking would be provided close to the site providing space for 6 vehicles. The internal road would have a width of 4.5 metres and would also be suitable for on-street parking of vehicles.
- 3.6 A new access would be provided approximately 24 metres to the west of the existing bungalow's driveway. The access would be 9.5m wide at the point it meets Old Mead Road. This will enable visibility splays of 30 metres to the west and at least 50 metres to the east to be achieved.
- 3.7 The application site is located near the western end of Old Mead Road with the only traffic coming past it accessing Glenvilla (residential property) and a caravan storage facility which is the subject of a current retrospective application cited as generating a 'very low' level of traffic. Vehicles naturally slow as they reach the near end of Old Mead Road so the visibility splays are considered to be satisfactory.

- 3.8 The existing bungalow would be retained along with its existing access on to Old Mead Road. A garden and parking area of 28.3m x 57m would be retained for the property. The existing sheds on the site would be removed.

Pre-Application Comments

- 3.9 A pre-application enquiry was submitted to Arun District Council in relation to a proposal for 30 residential mobile homes on the site and a response was received on 5th July 2017. A copy of the response is attached at Appendix A. In summary the response advised the following:

- The principle of a residential caravan site conflicts with policy GEN3, however the planning authority are unable to demonstrate a 5 year supply of housing land as required by paragraph 49 of the NPPF and therefore the adopted development plan policies relating to housing supply are out of date.
- The housing land supply position is 1.92 years (at the time of writing).
- The emerging Local Plan policies carry limited weight at this time.
- The Council needs to identify more suitable land to meet additional housing requirements than previously anticipated.
- The principle of 30 mobile homes would be acceptable.
- With suitable planting to site boundaries the proposed development would potentially have a minimal visual impact upon the locality given the low profile of the homes.
- Similarly, the proposal will potentially have a minimal impact upon the views of Arundel and its setting in accordance with policy AREA3 of the Arun District Local Plan.

- Visually it would be perceived as an expansion of other similar structures in the vicinity.
- The proposal would not give rise to any adverse overbearing, overshadowing or overlooking impacts on neighbours.
- The location is considered to be sustainable due to the proximity to essential facilities and to public transport.
- The proposal would provide lower cost accommodation which is in severe shortage in the district.
- The proposal would provide a small benefit to the local economy in terms of Council Tax and Business Rate receipts and construction jobs.

3.10 In summary the proposal was considered to be well designed and in keeping with the established character of the locality with the proposal constituting sustainable development. As such it was deemed to accord with the NPPF.

Affordable Housing Statement

3.11 The Council's Housing Officer has been consulted on the application and requirements for affordable housing. The advice received was that a commuted sum of £45,000 per affordable unit would be payable in lieu of on-site affordable housing would be acceptable. Age-restricted mobile homes will not generate the same development value as a traditional housing scheme and such a significant contribution could affect the viability of the scheme. There are unusual costs associated with the development of this site relating to flood risk mitigation which is likely to reduce the viability of the scheme further.

3.12 Nevertheless the applicant is willing to enter into a S106 agreement for the required sum to be paid upon completion in accordance with the Council's affordable housing policy, but reserves the right to renegotiate once the construction costs are known. Draft Heads of Terms are submitted with the application.

4 PLANNING BACKGROUND

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that planning applications are determined in accordance with the provisions of the statutory Development Plan unless material considerations indicate otherwise. Currently the Development Plan for the site comprises the saved policies of the adopted Arun District Local Plan (2003) and the Littlehampton Neighbourhood Plan (2014). Material considerations include the National Planning Policy Framework (NPPF).

National Planning Policy Framework

- 4.2 The NPPF sets out a presumption in favour of sustainable development (paragraph 14) which for decision taking means approving development proposals that accord with the development plan without delay. Where the development plan is absent, silent or relevant policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF as a whole.
- 4.3 Paragraph 7 of the NPPF sets out the three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles, namely:
- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

- 4.4 Paragraph 47 seeks to ‘boost significantly the supply of housing’. Planning authorities are required to meet their full Objectively Assessment Need for market and housing in the housing market area as far as it is consistent with the policies set out in the NPPF. Authorities are also required to identify and update annually a supply of specific deliverable sites sufficient to provide five year’s worth of housing with either a 5% or 20% buffer depending on the local authority’s record of housing delivery.
- 4.5 Paragraph 49 requires housing application to be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the planning authority cannot demonstrate a five year supply of deliverable housing sites. In such a circumstance, paragraph 14 of the NPPF is engaged.
- 4.6 Paragraph 198 states that planning permission should not normally be granted where it would conflict with a neighbourhood plan that has been brought in to force. However, a Ministerial Statement issued on 12th December 2016 confirmed that where a planning authority has less than a three year supply of deliverable housing sites and a neighbourhood plan is more than two years old that plan can be considered out of date.

- 4.7 Paragraphs 3.4 and 3.5 above are of particular relevance to this application as Arun District Council can currently only demonstrate less than two years housing land supply, and the neighbourhood plan is more than two years old.

Saved Policies of the Arun District Local Plan (2003)

- 4.8 The accompanying Proposals Map identifies the site as lying outside of the settlement boundary, within the strategic gap and within the Setting of Arundel Castle.
- 4.9 Policies that are considered to be of relevance to the proposals are as follows:
- 4.10 Policy GEN2 states that development will be permitted within the built-up area boundaries subject to other policies in the plan. Outside of the built-up area boundaries development will not be permitted unless it is consistent with other plan policies.
- 4.11 Policy GEN3 relates to the protection of the countryside and states that outside the built-up area the countryside will be safeguarded for its own sake.
- 4.12 Policy GEN7 requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics
- 4.13 Policy GEN9 requires development proposals to demonstrate that either adequate drainage capacity exists or can be provided.
- 4.14 Policy GEN11 requires developments which would be at risk of flooding and/or which could materially decrease the capacity of a floodplain are required to provide satisfactory flood storage/waterway areas.
- 4.15 Policy GEN12 requires developments to provide appropriate levels of car parking.

- 4.16 Policy GEN15 requires developments to provide safe and attractive facilities for cyclists and pedestrians where appropriate.
- 4.17 Policy AREA3 states no development will be permitted which would adversely affect views of Arundel or its special setting.
- 4.18 Policy AREA10 states that the strategic gaps will be maintained and protected between specified settlements, including between Arundel and Littlehampton.
- 4.19 Policy DEV17 (as amended) seeks 30% of new dwellings within schemes of 15 units or more to be affordable.
- 4.20 The Arun District Local Plan provides for the district's development needs up to 2011 and policies for the supply and distribution of housing are therefore considered to be out of date.

Emerging Arun Local Plan

- 4.21 The Council are in the process of preparing a new Local Plan. The publication version made provision for 580 dwellings per annum in the period 2011 – 2031. However, following an examination hearing session in January 2016 and in light of further evidence the objectively assessed need is considered to be 919 dwellings per annum.
- 4.22 The accompanying Proposals Map identifies the site as lying outside of the settlement boundary, outside of the Gaps between Settlements, and within the Setting of Arundel Castle.
- 4.23 Policy SD SP1 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 NPPF.

- 4.24 Policy H SP1 (as amended by the main modification which was subject to consultation in April and May 2017) provides for 20,000 new homes to be provided through the Local Plan between 2011 – 2031. Prescribed housing numbers for each town/village and neighbourhood plan are now proposed to be removed and replaced within a more flexible figure for non-strategic sites to provide 1250 dwellings through Neighbourhood Plans or a Small Site Allocations DPD.
- 4.25 The Council's most recent Local Development Scheme sets out the timetable for the plan's Examination and suggests the Examination being held in the summer of 2017 with adoption of the plan happening in the winter of 2017. However, this timetable has slipped with preliminary hearings for the Examination now planned to take place in September 2017.
- 4.26 Having regard to the provisions of paragraph 216 of the NPPF and given the early stage of plan preparation it is considered that limited weight can be attached to the policies contained within it.

Five Year Housing Land Supply Position

- 4.27 A Housing Implementation Strategy has been produced to support the modifications to the emerging Local Plan housing policies and this document identifies the current five year housing land supply situation. The current housing land supply cited (with a 'policy off' position) is 1.92 years.
- 4.28 A report to the Local Plan Sub-Committee recommended to Full Council that planning applications should be invited on sites identified as being 'deliverable' by the Housing and Economic Land Availability Assessment where they are considered sustainable and will not prejudice the emerging local plan and/or infrastructure delivery. This was due to the shortfall in housing land supply since the start of the plan period in 2011.

Arun Housing and Economic Land Availability Assessment (August 2017)

- 4.29 The latest HELAA identifies the site (reference 5) as being deliverable with a suggested total yield of 24 units.

Littlehampton Neighbourhood Plan (2014)

- 4.30 The Neighbourhood Plan states that planning permission will be granted where relevant policies within it are out of date or silent unless relevant policies in the Development Plan indicate otherwise; any adverse impacts would significantly and demonstrably outweigh its benefits; or specific policies in the NPPF or material considerations indicate otherwise. Policies 2 and 3 identify locations for new housing.
- 4.31 The discussion above (paragraphs 4.5 and 4.6 in particular) indicates that limited weight can be attached to policies within the Neighbourhood Plan relating to the supply and distribution of housing. Therefore Policies 2 and 3 relating to the location of new housing are considered to be out of date.

Other Designations

- 4.32 The site itself is not subject to any environmental designations.
- 4.33 The site lies within 360 metres of a listed building (Grade II Church Farmhouse). The Six Bells Public House (Grade II) is 405 metres away, Forge Cottage (Grade II) is 415 metres away and the Parish Church of St Mary Magdalen (Grade 1) is 470 metres away.
- 4.34 The majority of the site lies within Flood Zone 3, with the western boundary lying within Flood Zone 2.

Planning History

- 4.3.4 The site has been subject to two previous applications as follows:

LU/162/03/CLE – Certificate of Lawfulness for an existing use – residential use for bungalow and land

Approved 22nd July 2003

LU/278/90 – Outline application for residential development

Refused 21st November 1990

Lawful Use

- 4.3.5 The Certificate of Lawfulness related to the entire application site and confirmed the lawful use to be residential. The NPPF defines previously developed land as:

‘Land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated surface infrastructure. This excludes...land in built-up areas such as private residential gardens...’

- 4.3.6 As the site comprises permanent structures and the land lies outside the built-up area boundary it falls within the definition of previously developed land.

5 APPRAISAL

5.1 The main issues in the determination of the planning application are considered to be as follows:

- Principle of Development
- Design and Appearance
- Flood Risk and Drainage
- Ecology
- Heritage
- Transport and Highways

5.2 These issues are considered in further detail below.

Principle of Development

5.3 The application site lies outside the settlement boundary of Littlehampton and as such is located within the countryside, Saved Policy GEN2 of the Arun Local Plan (2003) states that outside of the built-up area boundaries development will not generally be permitted. Policy GEN3 also states that the countryside should be protected for its own sake and that new development should be consistent with its use and aims. However, the Council acknowledge in the pre-application response that these policies are out of date given the 5 year housing supply position

- 5.4 Further, whilst the Littlehampton Neighbourhood Plan does not identify the site as a housing allocation, as the Council are only able to demonstrate less than 3 years housing land supply and the plan is more than 2 years old the policies relating to the supply of housing must be considered 'out-of-date' under paragraph 49 of the NPPF. This is in accordance with the written ministerial statement discussed in paragraphs 4.5 and 4.6 above.
- 5.5 Thus paragraph 49 of the NPPF is engaged and the planning application falls to be determined against paragraph 14 of the NPPF which sets out a presumption in favour of sustainable development.
- 5.6 The proposal is considered to perform the three roles of sustainability as defined by the NPPF. In relation to the environmental role, the site is unaffected by any statutory environmental designations. The Preliminary Ecological Appraisal Survey identified water vole field signs along the eastern section of site frontage on to Black Ditch and the proposed layout incorporates a minimum of a 3 metre buffer from the toe of the bank to preserve the habitat. A Landscape Design Strategy has been prepared and includes the enhancement of water vole habitat through the growth of tussocky grassland within the buffer and the clearing of woody scrub from the banks.
- 5.7 A Heritage Statement is submitted with the application and confirms the proposal would not adversely affect the listed buildings within the vicinity or the setting of Arundel Castle. The development would be seen in the context of similar structures in the vicinity and the proposed landscaping would help to soften its appearance from public viewpoints.

- 5.8 In relation to the social aspect of sustainable development, the proposal would provide low cost accommodation which is greatly needed within the Arun District. The mobile homes would be age restricted and typically appeal to people approaching or in retirement who wish to downsize. This in turn would free up larger family sized accommodation in the area. The single storey nature of mobile homes also caters for people wanting all accommodation on one floor, and with very few bungalows being built as part of new housing developments this also serves a need not currently being catered for.
- 5.9 The mobile homes would be located adjacent to an existing residential area in walking distance to a wide range of shops, services and public transport options. The location would enable new residents to integrate with the existing community.
- 5.10 The proposal would also be subject to a commuted sum for the development of 7 affordable homes off-site which are much needed in the area.
- 5.11 In relation to the economic role of sustainable development, the installation of the mobile homes and on-going maintenance of the park once occupied would generate a number of jobs. The new residents would also increase spend in local shops and facilities helping to support the local economy. The development would also generate Council Tax payments.
- 5.12 The proposal is therefore considered to constitute sustainable development in accordance with the NPPF.
- 5.13 In addition, the site was identified as 'deliverable' in the latest Housing and Economic Land Availability Assessment. A report to the Local Plan Sub-Committee recommended to Full Council that planning applications should be invited on such sites where they are considered sustainable and will not prejudice the emerging local plan and/or infrastructure delivery. The discussion above confirms the proposal to constitute sustainable development which can be implemented without prejudice to the emerging plan or infrastructure delivery.

Design and Appearance

- 5.14 Planning Policies and Central Government Advice support the efficient and effective use of land. Policy GEN7(ii) requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics.
- 5.15 Advice further indicates that more intensive development is not always appropriate and that design which is inappropriate in its context should not be accepted. Furthermore new development should be well integrated with and complement the local area.
- 5.16 The locality is characterised by a mobile home park and relatively high density housing to the east, a two storey dwelling to the south, a solar panel farm and caravan storage to the west and farmland to the north. The proposed mobile homes are considered to be in keeping with this varied character and will be seen alongside the Thornlea Park development comprising residential mobile homes of similar scale, appearance and layout.
- 5.17 The proposal is therefore considered to be in keeping with the area and of an acceptable design and appearance that relates well to its surroundings.

Flood Risk and Drainage

- 5.18 The site is located within an area classified as Flood Zone 3a at risk of flooding from tidal or fluvial sources but benefitting from existing flood defences which protect the site up to the 1 in 200 year tidal flood event. The site lies outside the area of functional flood plain.
- 5.19 The proposed development will incorporate a sustainable drainage system which will discharge surface water at the existing Greenfield run off rate into the existing watercourse.

- 5.20 Surface water runoff from the site can be collected and stored prior to discharge using a combination of conveyance and filtration systems including rain gardens and swales. The drainage system will be designed to cater for all storm return periods up to and including the 1 in 100 year rainfall event with an allowance for climate change.
- 5.21 Foul drainage will be discharged to the existing discharge point from the site along Old Mead Road.
- 5.22 A Flood Risk Assessment incorporating a drainage strategy is submitted with the planning application.

Ecology

- 5.23 As mentioned previously, a Preliminary Ecological Appraisal Survey was undertaken on 9th August 2017 to appraise the existing ecological resource within the site and surrounding area.
- 5.24 The survey revealed water vole signs along the eastern section of site frontage onto Black Ditch. 3 no. latrines were located, as well as feeding remains. The layout has therefore been designed to avoid any impacts to the ditch and banks, whilst retaining a buffer of at least 3m from the toe of the bank. This buffer will be allowed to develop into tussocky grassland and areas of woody scrub will also be cleared from the banks to maintain optimal water vole habitat.
- 5.25 2 bird nests were also identified within the smaller outbuilding in the southern part of the site which is proposed for removal. As a result the building will be inspected by a qualified ecologist prior to removal to ensure no active birds' nests are present, or it will be removed outside of the bird nest season (ie outside of March – August).
- 5.26 No further ecological constraints were noted within or adjacent to the site.
- 5.27 A soft landscaping scheme has been prepared which will offer biodiversity gains.

Heritage

- 5.28 The site lies within the setting of Arundel. There are also a number of listed buildings within the vicinity, two of which have a direct view of the site although are located over 400m from it.
- 5.29 The site is located in between a caravan storage facility and residential mobile home park. As such the site would be perceived as an expansion of similar structures in the vicinity. The site is considered to contribute very little to the setting of the various heritage assets in the area and the proposal is therefore not considered to result in any heritage impact.

Transport and Highways

- 5.30 The internal roads will be 4.5m wide and a 10mph speed limit will be imposed. The roads will be privately managed by the park owner.
- 5.31 One car parking space per mobile home will be provided, which is the usual standard for residential mobile home parks. Car ownership is typically lower amongst park residents, partly due to residents usually being in retirement so such level of car parking is considered sufficient.
- 5.32 Six visitor spaces will be provided by the site entrance, four of which would be suitable for use by disabled users.
- 5.33 All car parking spaces measure at least 3m x 6m.
- 5.34 A secure cycle store will also be provided close to the centre of the site.

6 DRAFT HEADS OF TERMS

- 6.1 Planning Obligations may only be used where they satisfy the relevant tests and are necessary to make the development necessary in planning terms.
- 6.2 The proposed development is considered to accord with planning policy, however the Council has indicated that a financial contribution towards off-site provision of affordable housing would be required. Therefore a S106 agreement will be required to secure the required payment.

7 SUMMARY

- 7.1 The proposed development would provide 25 age restricted residential mobile homes on a site in close proximity to a wide range of services and facilities in Littlehampton.
- 7.2 The site has been identified as 'deliverable' within the latest Housing and Economic Land Availability Assessment and could be developed without prejudice to the emerging plan or infrastructure delivery. The proposal is therefore compliant with Arun District Council's approach to housing delivery which seeks to invite applications on HELAA sites assessed as deliverable.
- 7.3 Arun District Council are not able to demonstrate a five year housing land supply. Many of the policies within the adopted Local Plan are now time-expired, and the plan does not provide for the district's housing needs beyond 2011. As such, paragraph 14 of the NPPF is engaged and the proposal falls to be determined against the presumption in favour of sustainable development.
- 7.4 The proposal is considered to perform the three roles of sustainability as defined by the NPPF. The site is unaffected by any statutory environmental designations and incorporates proposals for biodiversity enhancements.
- 7.5 The proposal would also provide much needed low cost accommodation for the over 55s, enabling under occupied properties in the district to become available to families. The single storey nature of mobile homes also caters for people wanting all accommodation on one floor, and with very few bungalows being built as part of new housing developments this also serves a need not currently being adequately catered for.
- 7.6 The mobile homes would be located adjacent to an existing residential area in walking distance to a wide range of shops, services and public transport options. The location would enable new residents to integrate with the existing community.

- 7.7 The proposal is considered to provide significant social, environmental and economic benefits in accordance with paragraph 14 of the NPPF. We therefore consider planning permission should be granted.

Appendix A



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Your Ref:
Our Ref: PAA/97/17/
Please ask for: Mrs A Gardner
01903 737529

5th July 2017

Dear Ms C Bartlett

Pre-Application Advice

Proposed residential mobile home park.
Land West of Thornlea Park Littlehampton

I write regarding the above matter and your enquiry received on 4th May 2017.

Description Of Proposed Development

From the details submitted I understand that you propose to provide 30 residential 2 bedroom mobile homes situated outside of the built up area boundary for permanent residential occupation by the over 55s. Each unit would have a parking space and small private garden. The proposal also includes a small visitor parking area and cycle store at the entrance and the internal road has a width of 4.5m.

Description Of Site

Agricultural site
The site comprises a bungalow, sheds and redundant nursery land. The site is generally flat and 1 hectare in size and there are no trees affected by your proposal.

Description Of Locality

Rural Locality

To the east of the site lies Thornlea Mobile Home Park, to the south lies Old Mead Road and farmland. West storage of caravans takes place and to the north is agricultural.

Planning Issues

The following issues have been identified for consideration.

Principle
Design
Neighbour Amenity
Bin Storage

dec/paa

Highways, Transport and Parking
Sustainability
Sustainable Construction
Strategic Gap
Flooding/Drainage
Biodiversity
Tourism

Relevant Planning History

LU/162/03/CLE	Application for a Certificate of Lawfulness for an existing use - residential use for bungalow and land.	Approve 22-07-2003
LU/278/90	Outline application for residential development	Refused 21-11-1990
		Appeal: Dismissed 25 07 1991

Comment On Site History

Relevant Policies - the following policies are considered relevant to your proposal:

Arun District Local Plan:	AREA10 AREA3 GEN3 GEN7 GEN9 GEN11 GEN15 GEN2	Strategic Gaps The Setting of Arundel Protection of the Countryside The Form of New Development Foul and Surface Water Drainage Inland Flooding Cycling and Walking Built-up Area Boundary
Publication Version of the Local Plan (October 2014):	C SP1 Countryside D DM1 Aspects of Form and Design Quality D SP1 Design W DM2 Flood Risk LAN DM2 The Setting of Arundel	
Littlehampton Neighbourhood Plan 2014 Policy 1	The Presumption in Favour of Sustainable Development	
Planning Policy Guidance	NPPF NPPG	National Planning Policy Framework National Planning Practice Guidance

Principle

The site is situated outside the built-up boundary where the principle of development is considered unacceptable. Development Plan policies seek to exert a strict control over new development in the countryside to protect it for its own sake. Development will only be permitted in exceptional circumstances or where there is a strong justification for a countryside location. The Government's planning advice indicates that planning authorities should continue to ensure that the quality and character of the wider countryside is protected, and where possible enhanced.

Policy GEN3 of the Arun District Local Plan states that development will not be permitted unless:

deopaa

"(i) it meets the operational needs of agriculture, forestry, the extraction of minerals or the deposit of waste; or

(ii) for quiet, informal recreation; or

(iii) for the diversification of the rural economy; or

(iv) for essential road schemes; or

(v) it is in accordance with policy in Sections 2 and 3 of the plan referring to specific use or type of development."

The principle of a residential caravan site in the location proposed is considered to conflict with policy GEN3 of the Arun District Local Plan. Given the permanent residential use of the site proposed it could not be considered as an exception in terms of tourism policies.

The site also lies within the Arundel and Littlehampton Strategic Gap. Policy AREA10 of Arun District Local Plan requires development to be consistent with other Development Plan policies, to not compromise the objectives or integrity of the strategic gap either individually or cumulatively and to provide long term enhancement of the landscape, amenity and conservation value. On this basis any submitted planning application should include landscape and conservation enhancements.

Further, with suitable planting to site boundaries the proposed development would potentially have a minimal visual impact upon the locality given the low profile of the homes. Similarly, the proposal will potentially have a minimal impact upon the views of Arundel and its setting in accordance with policy AREA3 of the Arun District Local Plan. Visually it would be perceived as an expansion of other similar structures in the vicinity.

The site is outside the built up area of Littlehampton in a location that is not allocated for housing in the Local Plan 2003. The site is similarly not identified in the emerging Arun District Local Plan, but is also not within a designated settlement gap. There are also no policies specifically relating to the site in Littlehampton Neighbourhood Plan, although Policy1: 'The Presumption in Favour of Sustainable Development' is considered relevant.

However, the Local Planning Authority are unable to demonstrate a 5 year supply of housing land as required by paragraph 49 of the NPPF. Furthermore, the Examination into the emerging Local Plan was suspended by the Planning Inspector on the grounds that the Council's Objectively Assessed Housing Need (OAN) should be reviewed higher than that proposed 580 units p.a in the Emerging Local Plan. The Council will need to identify more suitable land supply to meet additional housing requirements. The OAN figure has now been increased to 919 units per annum as of October 2016. Additional strategic sites are currently being assessed and allocated in order to meet this higher figure.

The NPPG has provided clear guidance on the issue of the weight that can be given to both the adopted local plan and emerging or made Neighbourhood Plans where the Council cannot demonstrate the 5 year supply of deliverable housing sites. Therefore the adopted development plan policies relating to housing supply are out of date and the emerging Local Plan policies carry limited weight at this time.

Where the development plan is absent, silent or the relevant policies are out of date, paragraph 14 of the NPPF states that the presumption in favour of sustainable development requires the granting of planning permission, 'unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits'. Furthermore, paragraph 49 states that:

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"Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites"

A written Ministerial Statement was published on the 13th December 2016 which stated that;

"relevant policies for the supply of housing in a neighbourhood plan, that is part of the development plan, should not be deemed to be 'out-of-date' under paragraph 49 of the National Planning Policy Framework where all of the following circumstances arise at the time the decision is made:

- this written ministerial statement is less than 2 years old, or the neighbourhood plan has been part of the development plan for 2 years or less;
- the neighbourhood plan allocates sites for housing; and
- the local planning authority can demonstrate a three-year supply of deliverable housing sites.

The statement applies to decisions made on planning applications and appeals from the date it was laid."

The Council are currently only able to demonstrate <2 year HLS and the Neighbourhood Plan is more than 2 years old and as such the policies relating to the supply of housing in the Littlehampton Neighbourhood Plan must be considered 'out-of-date' under para 49 of the NPPF in accordance with the written ministerial statement.

Therefore, as the Council are only able to identify a <2 year HLS the Littlehampton Neighbourhood Plan policies in relation to supply of housing are out of date in the determination of this application.

As set out in the sustainability paragraph the proposal is considered to constitute sustainable development in accordance with paragraph 7 of the National Planning Policy Framework (NPPF) and as such is supported by paragraph 26 of the NPPF.

A Housing Implementation Strategy has been produced (March 2017) to support the modifications to the Local Plan housing policies and this document identifies the current five year housing land supply situation. The current housing land supply (with a 'policy off' position) is 1.92 years. A report to the Local Plan Sub-Committee recommended to Full Council that planning applications should be invited on sites identified as being 'deliverable' by the HELAA where they are considered sustainable and will not prejudice the emerging local plan and/or infrastructure delivery. This was due to the shortfall in housing land supply since the start of the plan period in 2011. The emerging Plan must ensure that an adequate supply of sites to provide for a rolling five year land supply over the course of the Plan period once the Plan is in place.

Once the Local Plan is adopted and is able to carry significant weight, the policies will seek to exert a strict control over new development in the countryside to protect it for its own sake. Development will only be permitted in exceptional circumstances or where there is a strong justification for a countryside location. The Government's planning advice indicates that planning authorities should continue to ensure that the quality and character of the wider countryside is protected, and where possible enhanced.

However, it is now accepted that because housing policies only related to housing provision up to 2011, the weight afforded to them is significantly reduced. In recent appeal determinations inspectors have confirmed that the principle of development on land outside the defined built up boundary can be accepted in certain cases. In relation to the sustainability of the location has previously been considered sustainable given the neighbouring residential sites under construction. This site has been included within the Arun District Housing and Economic Land

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In principle it is therefore considered that the provision of 30 mobile homes would be acceptable.

Design

Planning Policies and Central Government Advice support the efficient and effective use of land. Policy GEN7(ii) requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics. Central Government Advice further indicates that more intensive development is not always appropriate and that design which is inappropriate in its context should not be accepted. Furthermore new development should be well integrated with and complement the local area in terms of, for example, layout.

The character of the locality is mixed with a large mobile home park located to the north; greenhouses to the east; 5.2 hectares of solar panels to the west; and Old Mead House a two storey dwelling to the south. It is considered that the proposed mobile homes are in keeping with the established character of the locality and as such will not give rise to unacceptably adverse harm to the visual amenity of the area. The proposed development is considered to be enveloped on all sides by existing development and as such the proposal will not constitute an encroachment into the countryside.

Although the proposal is contrary to policy GEN3 of the Arun District Local Plan by virtue of its location outside of the built area boundary, it is considered that the proposed development does not give rise to any unacceptably adverse harm to character and appearance of the area and does not unacceptably encroach into the countryside or the strategic gap.

There is another mobile home site and caravan storage area in the locality and the proposal would not therefore be out of character in this location. Further, subject to appropriate landscaping, given their limited height the units would be considered to have an acceptable impact on visual amenity. They would not result in an isolated feature in open countryside and visually would be perceived as an expansion of other similar uses.

Neighbour Amenity

Arun District local Plan Policy GEN7 (iv) indicates that development will be permitted if it takes into account impact on adjoining occupiers, land, use or property. One of the 'core planning principles' of the NPPF is to secure high quality design and a good standard of amenity (paragraph 17). Both the adopted Local Plan Policy GEN7 and the emerging Local Plan policy require regard to be had to the amenity & living conditions of neighbouring properties.

Glenville residential dwelling is located adjacent to the western boundary of the site and Thomlea Park abuts the site to the east. 2m high close boarded fencing encloses Thomlea Park. Although the units and their limited garden areas are adjacent to the site boundaries, the access roads are located within the site and vehicular activity would not therefore take place immediately adjacent to residential units. The proposed layout is considered acceptable in terms of the impact on neighbouring residential amenity on this basis.

Therefore, it is considered that the proposed development does not give rise to any unacceptably adverse overbearing, overshadowing or overlooking impacts on neighbours and as such the proposed development is considered to accord with policy GEN7(iv) of the Arun District Local Plan.

Affordable Housing

The Supporting Statement includes a proposal to provide a commuted sum payable in lieu of on-

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site affordable housing, in principle the Council's Affordable Housing Officer has advised this would be an acceptable outcome for the Council. The actual figure would need to be of a similar value required to replace 9 (30%) affordable homes elsewhere in the Arun district. The Council's current policy requirement is for a sum of £45,000 for each foregone affordable housing unit payable as commuted sum. However, as the development relates to mobile homes, which will provide for a lower overall Gross Development Value, this sum should be agreed with the Council's Housing Strategy and Enabling Manager prior to a full planning application being submitted.

Highways Transport And Parking

Planning policies allow for the safe movement of pedestrians and vehicles, giving priority to pedestrians, and car parking. I am not able to consult with West Sussex County Council on pre-application enquiries and so I am unable to provide any comments in relation to the proposed access or the suitability of visibility splays. However, you can contact them yourself for pre-application advice through their website at:

<https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/>.

Sustainability

Government Planning policy is to encourage appropriate development in a location that will enable a reduction in the need to travel, particularly by private car and that planning should contribute to reduce emissions and reduce climatic change. The proposed development is considered to be sustainable due to the proximity to essential facilities, availability and close proximity of public transport. As stated in the supporting information all of the facilities within Littlehampton are accessible via a made footpath which starts approx. 140m from the site.

NPPF TEST ON SUSTAINABILITY

Paragraph 7 of the NPPF sets out the three dimensions to sustainable development - the economic, social and environmental roles. Below I set out the assessment in respect of the three roles of sustainability as identified in the NPPF.

Environmental Role -

Paragraph 55 of the NPPF advises that new isolated homes in the countryside should be avoided, unless there are special circumstances. It also states that housing in rural areas should be located where they will enhance or maintain the vitality of rural communities. Whilst, the proposed mobile homes are not dwelling houses they will provide permanent residential accommodation.

The site is located outside of the built up area boundary but within close proximity to other rural development as identified earlier in this report. The nearest bus stop is located approximately 160m to the east of the site, with The Six Bells public house located the same distance away adjacent to Old Mead Road. The nearest local convenience shop is located approximately 800m away. These are considered to be acceptable walking or cycling distances.

However, it must be considered that the first 140m of this journey is devoid of footpaths along Old Mead Road which is a shared surface. There is also limited street lighting available on Old Mead Road. There are also no dedicated cycle lanes on Lymminster Road although there are footpaths into Wick.

The nearest bus stop to the application site falls upon the 700 route with buses available approximately every 30mins between Arundel and Brighton. Therefore, it is considered that the proposed site benefits from adequate access to local facilities and public transport and as such would accord with Paragraph 55 of the NPPF.

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Social Role -

The proposed development would provide 30 no. residential mobile homes considered to represent lower cost accommodation which is in severe shortage in the district. Therefore this is considered to be in the schemes favour.

Economic Role -

It is considered that the proposed development will result in a not insignificant amount of Council Tax and Business Rate receipts as well as provide a small number of jobs during installation. Therefore, the proposed development would provide a small benefit to the local economy which is in favour of the proposed development.

It is deemed that the proposal constitutes sustainable development in accordance with the NPPF.

NATIONAL PLANNING POLICY FRAMEWORK

Paragraph 26 of the National Planning Policy Framework states that "the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings" should be supported. It is deemed that the proposed office has been designed with the constraints of the site having been considered.

The proposed development the subject of this application is well designed and in keeping with the established character of the locality with the proposal constituting sustainable development and as such is deemed to accord with the NPPF.

Sustainable Construction

Sustainable Construction

Tackling climatic change is a key government priority for the planning system. Applicants for planning permission should consider how well their proposals for development contribute to the Government's ambition of a low carbon economy and how well adapted they are for expected effects of climatic change. Applicants should consider provision of renewable energy in the form high level insulation, rainwater harvesting a general minimal energy use, including Carbon Dioxide reduction.

Emerging Local Plan Policy ECC SP2 "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 standards in the level of the Code for Sustainable Homes or appropriate BREEAM rating, 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."

And that:

"In assessing the achievement of these standards the Council will consider:

- * Site constraints;
- * Technical viability;
- * Financial viability; and
- * Delivery of additional benefits."

Please ensure that you have regard to this Policy if you prepare a planning application.

Flooding

Planning Policies and the National Planning Policy Framework require development not to give rise to an unacceptable risk of flooding detrimental to human health or property. There are

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requirements regarding the submission of a Flood Risk Assessment and Sequential test documentation. The relevant requirements for these are dependent upon the designated flood zone that the site is located within.

The Environment Agency website details designated flood zones and it would appear that the proposed site falls within Flood Zone 3. I therefore consider that you will need to provide a Flood Risk Assessment which includes the application of the Sequential Test.

Further information regarding flood risk and the requirements can be found at the following website address: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

Biodiversity

Planning Policies and Central Government Advice advice Planning Policy Statement 9 Biodiversity and Geological Conservation indicate that developments should aim to maintain and enhance, restore or add to biodiversity and geological resources of the area. An ecological report will need to be submitted setting out the biodiversity present, how biodiversity impacts can be avoided, appropriate mitigation measures and if necessary, compensation measures in the absence of mitigation and how biodiversity gains can be made. All ecological surveys need to be undertaken by a suitably qualified ecologist and at the right time of year and for the right duration.

Environmental Health Comments

The Council's Environmental Health Officers have made the following comments:

No objection to the creation of an additional mobile home park in principle.

Any such park will need a site licence but a licence cannot be granted unless planning consent is in place. The design of the proposed site should comply in detail with the Licensing requirements, the relevant model standards and the Council's own site licensing determination policy should either accompany the proposal or, if this is not feasible, conditions would be attached to any permission such that the site cannot be developed until an agreed design is in place.

Conclusion

Although the proposal is situated outside of the built area boundary and within a strategic gap, development plan policies, as they apply to the supply of housing are out of date, and there are no significant adverse effects from granting planning permission. The proposal therefore accords with paragraph 14 of the NPPF and should be approved.

However any application should include appropriate landscaping and conservation enhancements to reduce the impact upon the visual amenity of the countryside. I conclude that were an application for planning permission to be submitted it would be likely to be approved subject to conditions relating to lighting, landscaping, ecological enhancements and drainage.

It should be noted that this response does not include the comments of County Highways or the Environment Agency. Both of these consultees could influence the final decision reached on any application submitted.

Making an Application

If you decide to proceed with making an application you will need to quote the reference number for this advice in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

You will need to submit the following documentation/information with your application to meet the National Validation Requirements:

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Fully completed and signed Application Form with full description of the proposal.
Ownership Certificate and Agricultural Land Declaration
Design and Access Statement
Correct Fee
Location Plan (1:1250)
Site / Block Plan (1:500)
Elevations (Existing and Proposed)
Floor Plans (Existing and Proposed)
Roof Plans

Additionally the following documents will need to be provided to meet the Local Validation Requirements:

Please note that the Council has a Local Validation Requirements List and you should refer to it before submitting your application. Failure to provide the required documentation and to complete the Validation Checklist and the Biodiversity Checklist will result in the application being treated as incomplete and delay the validation of the planning application.

Having looked through the Local Validation Requirements List, I would suggest that the following additional documents will be required:

Biodiversity Survey and Report
Flood Risk Assessment
Foul and Surface Water Drainage Statement
Lighting Assessment
Bin Storage and Collection Provision
Parking Plan

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case Officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the Case Officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request. Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely



Neil Crowther
Group Head of Planning