



Town and Country Planning Act 1990

PLANNING STATEMENT

Land at The Bungalow, Old Mead Road, Littlehampton

*Demolition of a bungalow and outbuildings and the erection of 22 dwellings with
associated parking and open space*

ON BEHALF OF

TA Homes (Land) Limited

PREPARED BY

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1 INTRODUCTION

- 1.1 This Planning Statement is prepared on behalf of TA Homes (Land) Limited in support of a full planning application for the following:

Demolition of a bungalow and outbuildings and the erection of 22 dwellings with associated parking and open space.

- 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 In accordance with the adopted Local Plan and Arun's Validation Checklist, this Statement also includes an Affordable Housing Statement.

- 1.4 The application is supported by the following documents and plans:

- Planning application forms
- Planning Statement
- Design and Access Statement
- Heritage Statement
- Preliminary Ecological Appraisal Survey
- Flood Risk Assessment (incorporating a Foul Drainage Strategy)
- Biodiversity Checklist
- Topographical Survey
- Site Location Plan

- Proposed Layout Plan
- Proposed Floor, Elevational and Roof Plans
- Street Scene Images
- Validation Checklist
- Planning Application Summary

2 THE SITE

- 2.1 The application site extends to 1 hectare and comprises a bungalow, sheds and associated residential garden and amenity land.
- 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 land used for caravan storage and as a solar farm.



Figure 2.1: The Site

Context Appraisal

- 2.3 The site is located immediately adjacent to the Littlehampton built up area, which is typified by medium to high density residential dwellings with mixed architectural styles, both in the form of standard housing and permanent mobile homes. Singular residential properties can be found on the western end of Old Mead Road, including the application site, Glenvilla (an agricultural dwelling) and Old Mead House.

- 2.4 A solar panel farm and caravan storage facility are located to the west and farmland lies to the north.
- 2.5 Glenvilla to the west stands at one storey, with additional accommodation housed within a tall pitched roof. Residential properties to the east comprise typical mobile accommodation which also stand at one storey in height. Old Mead House and properties located 150 metres along Old Mead Road to the east stand at 2 storeys high.
- 2.6 There is a mixed material palette used within the area including red and cream brick, red roof tiling, cream cladding (particularly for nearby mobile homes), concrete and glass nursery buildings.
- 2.7 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 in Table 2.1 below. These facilities are accessible via a made footpath which starts close to the site on Old Mead Road.

Table 2.1: Nearby Facilities

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

Facility	Details	Distance from site
Community facilities	The Six Bells Public House	160m
	The Wickbourne Community Centre	2.4km
Leisure facilities	Worthing Road Recreation Ground	1.2km
	The Wave Leisure Centre	4.6km
Bus Stops	700 Coastliner, 9 and 602 services in both directions	160m
Railway Station	Littlehampton Railway Station	2.5km

Environmental Designations

- 2.8 The site is located within the countryside and within the Setting of Arundel. Lyminster Conservation Area is located approximately 500 metres to the north.

3 PLANNING HISTORY

3.1 Two planning applications were submitted for the site in November 2017 by the landowner, which comprised two separate options for permanent residential accommodation for the site. These applications were as follows:

- **Application 1:** Change of use for the stationing of 25 no. mobile homes for permanent residential occupation, restricted to occupants over the age of 55 (ref. LU/375/17/PL); and
- **Application 2:** Outline planning application for the erection of up to 25 dwellings (ref. LU/376/17/OUT).

3.2 Both applications were subsequently refused by Arun District Council primarily on the basis that they were outside the built-up area boundary, with the Local Plan being adopted and five year housing land supply position changing during the course of the application's determination. The council were also not satisfied that the developments were suitably flood resilient / resistant for the site's position within Flood Zone 3, amongst other reasons which have been discussed later within this report.

3.3 The proposal for residential dwellings has now undergone further design development and engagement with the Environment Agency to ensure that the site and proposed homes are sufficiently engineered to withstand periods of flooding. Residential dwellings were considered to be the more appropriate option for the site as they allow for a wider range of flood mitigation measures to be designed into the scheme when compared to mobile homes, whereby all habitable rooms would be sited on one storey.

3.4 In addition, the five year housing land supply position and the results of the first Housing Delivery Test for the Arun District indicate a need for additional housing. The effect this has on policy is detailed further in Section 4 of this report and an assessment of the scheme against the reasons for refusal given in 2018 has been provided in Section 5.

4 THE PROPOSAL

- 4.1 The proposal is for the demolition of the existing bungalow and outbuildings, and the erection of 22 dwellings with associated car parking and open space. A financial contribution will be made towards the off-site provision of affordable housing.
- 4.2 The following plans and reports are submitted in support of the planning application:

Plans	Reports
Site Location Plan	Planning Statement
Topographical Survey (Existing Site Plan)	Flood Risk Assessment and Drainage Strategy
Proposed Site Layout Plan	Affordable Housing Statement
Floor and Elevational Plans – 1 Bedroom Flats	Preliminary Ecological Assessment
Floor and Elevational Plans – 2 Bedroom Terraced Houses	Biodiversity Checklist
Floor and Elevational Plans – 3 Bedroom Detached Houses	Design and Access Statement
Floor and Elevational Plans – 3 Bedroom Semi-Detached Houses	Heritage Statement
Floor and Elevational Plans – 4 Bedroom Detached Houses	Validation Checklist
Street Scene Images	Planning Application Summary

4.3 The proposed housing mix is as follows:

- 8 x 1 bed flats (37%)
- 6 x 2 bed houses (27%)
- 6 x 3 bed houses (27%)
- 2 x 4 bed houses (9%)

4.4 Following the demolition of the existing bungalow the net gain of residential units would be 21 units.

Figure 4.1 – Proposed Layout



- 4.5 Units 1-8 comprise the 1 bed flats arranged on the first and second floors with garaging and a cycle store at ground floor level. Units 9-14 comprise the 2 bed houses, Units 15 – 18 and 20-21 are the 3 bed houses and Units 19 and 22 are 4 bed houses. All houses have garaging and a cycle store at ground floor level together with a garden room, living accommodation at first floor level and bedrooms on the second floor.
- 4.6 Due to the size of site a financial contribution towards the cost of off-site affordable housing provision will be made. The pre-application response confirmed that this would be an acceptable outcome for the Council.
- 4.7 1920sqm of open space would be provided at the rear of the site. This equates to 52.8sqm per person, assuming 2.4 people per dwelling.

Access and Parking

- 4.8 The existing access on to Old Mead Road would be utilised and widened to serve the development. The driveway has been moved slightly away from the boundary with Thornlea Park to allow for a planted buffer to be provided between the two sites. The access road would be 6m wide with a pavement providing a continuous pedestrian link up to Old Mead Road. A 3m wide strip of land is provided across the site frontage to preserve a right of way enjoyed by the neighbouring property (Glenvilla).
- 4.9 The application site is located towards the western end of Old Mead Road with the only traffic travelling past it accessing Glenvilla and a caravan storage facility, which was the subject of a retrospective application cited as generating a 'very low' level of traffic. Vehicles are naturally slow as they reach the near end of Old Mead Road so the visibility splays are considered to be satisfactory.
- 4.10 Secure cycle parking would be provided within each plot at ground floor level.

- 4.11 The layout plan shows 35 parking bays (14 allocated) in addition to 22 parking spaces provided within garages. This equates to 36 allocated spaces and 21 unallocated spaces, which is required by the WSCC parking demand calculator (attached at Appendix A).

Affordable Housing Statement

- 4.12 The Council's Housing Officer was consulted on the original outline planning application for mobile homes. The advice received was that a financial payment for off-site provision of affordable homes would be acceptable. The net gain of units is 21 and therefore a financial contribution towards the provision of 7 units would be required.
- 4.13 The applicant is willing to enter into a Section 106 agreement to secure the provision of the required sum.

5 PLANNING POLICY

- 5.1 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.
- 5.2 Currently the Development Plan for the site comprises the Arun Local Plan (2011-2031) (adopted in July 2018) and the Littlehampton Neighbourhood Plan (2014). Material considerations include the National Planning Policy Framework (NPPF) and local Supplementary Planning documents relating to Open Space and Recreation (October 2000), and Parking (October 2000).

National Planning Policy Framework (NPPF)

- 5.3 The NPPF (2019) sets out the three dimensions to sustainable development: economic, social and environmental within Paragraph 8. 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.

- 5.4 At the heart of the Framework is a presumption in favour of sustainable development. Paragraph 11c confirms that for decision taking this means approving development proposals that accord with the development plan without delay. Paragraph 11d states that where there are no relevant development plan policies, or the policies which are most important for determining the application 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.
- 5.5 Footnote 7 clarifies that for applications involving the provision of housing, Paragraph 11d also includes situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites with the appropriate buffer (as identified below), or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.
- 5.6 Paragraph 117 seeks to promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Planning authorities are required to meet their Objectively Assessment Need for housing in a way that makes as much use as possible of previously developed or ‘brownfield land’.
- 5.7 Authorities are also required in Paragraph 73 to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

- 5.8 This supply should also include a buffer of either a 5% to ensure choice and competition in the market for land; 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or a recently adopted plan; or 20% where there has been significant under delivery of housing over the previous three years (below 85% of the housing requirement measured against the Housing Delivery Test).
- 5.9 Paragraph 75 states that where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years.
- 5.10 Paragraphs 14 relates to Neighbourhood Plans and states that where the presumption in favour of sustainable development applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided that all of the following apply:
- a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;
 - c) the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
 - d) the local planning authority's housing delivery was at least 45% of that required over the previous three years.

- 5.11 Paragraphs 4.7, 4.8 and 4.9 above are of particular relevance to this application as Arun District Council do not currently have an up to date Five Year Housing Land Supply (as set out below), are below 95% of the local planning authority's housing requirements of February 2019, and the relevant neighbourhood plan is more than two years old.
- 5.12 Finally, Chapter 14 of the NPPF relates to the challenge of climate change, flooding and coastal change. Paragraph 163 states that development should only be allowed in areas at risk of flooding where, in consideration of a site-specific flood risk assessment, it can be demonstrated that:
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
 - b) the development is appropriately flood resistant and resilient;
 - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
 - d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Arun Local Plan (2011-2031)

- 5.13 The Arun Local Plan was adopted in July 2018 and sets out the long-term vision for the District until 2031.
- 5.14 The accompanying Proposals Map identifies the site as lying outside of the built-up area boundary and within the Setting of Arundel, as shown in Figure 5.1. The site falls just outside the boundary of the Arundel to Littlehampton Gap Between Settlements within the Local Plan, but within a Strategic Gap identified within Arun Green Infrastructure Study (2012).
- 5.15 Policies that are considered to be of relevance to the proposals are as follows:

- 5.16 Policy SD SP1 states that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF.
- 5.17 Policy SD SP1a confirms the Council's aim to provide for the housing needs of the community by delivering 20,000 homes of an appropriate scale and tenure. It states that strategy is to provide for development in the countryside area which reflects its character and role as the coastal plain and encourage the effective use of previously developed land, provided that it is not of a high environmental value.
- 5.18 Policy C SP1 relates to areas outside the Built-Up Area boundary and states that land will be defined as countryside. Development will be restricted to specific uses. It continues to note that the Council will take into account cumulative impact of development in the consideration of planning applications and early consideration will need to be given to landscape and biodiversity enhancement, recreation provision and access routes.
- 5.19 Policy GI SP1 states that all major development must be designed to protect and enhance existing green infrastructure assets and the connections between them, to ensure a joined up Green Infrastructure Network. The site lies within a Type A Green Infrastructure Corridor and adjacent to the Black Ditch river.
- 5.20 Policy LAN DM1 relates to landscape character and states that development should have regard to the setting of the South Downs National Park and respect and where possible, reinforce/repair, the characteristics and natural features of their relevant landscape character.
- 5.21 Policy LAN DM2 states that development will not be permitted within the area identified as being within the Setting of Arundel Castle which would adversely affect the views of the town of Arundel, its castle, Cathedral and special setting. Any development should be of a high design standard that reflects the quality of the landscape and the setting of Arundel.

The map shows the town of Lymington at the top right. Below it are several areas labeled: "Lymington Park", "Horsfield Nurseries", "Old Wood Nursery", "Landfield Nursery", and "Lymington Forest". A dashed line runs along the bottom and left sides of the central area. The left side of the map is dominated by a large area with diagonal hatching.

5.23 Since the refusal of the original Outline planning application for housing on-site, the Government has introduced a new method of measuring annual housing delivery in the July 2019 revision of the NPPF, called the Housing Delivery Test. The Test measures whether an authority's planned housing requirements have been met over the previous three years.

5.24 The results of the first Test were published in February 2019, which confirmed that Arun District was at 91% of their required housing target. Paragraph 75 of the NPPF requires local authorities who fall under 95% of their housing requirement over the previous three years to produce an Action Plan to identify the causes of under-delivery and set out actions to increase delivery in future years.

- 5.25 The National Planning Practice Guidance indicates that this Plan should be published within 6 months of the publication of the Housing Delivery Test measurement. Arun Council published their plan in June 2019 which includes a set of actions and opportunities to assist with boosting housing delivery. These are discussed further below.
- 5.26 The results of the second Test were published on 13th February 2020 which confirmed a reduced performance of 68%. This means Arun District Council is required to apply a 20% buffer to its five year housing land supply figures.

Five Year Housing Land Supply Position

- 5.27 Local planning authorities are able to demonstrate a 5 year housing land supply by 'confirming' the 5 year land supply using a recently adopted plan, or through a subsequent annual position statement, in accordance with paragraph 74 of the NPPF. The Arun Local Plan is defined as "recently adopted" and therefore has an established housing land supply up to 31st October 2019.
- 5.28 Arun District Council's latest position on their 5 Year Housing Land Supply was set out in the Authority Monitoring report (1st April 2018- 31st March 2019), published in December 2019. The extract provided in Figure 5.2 below demonstrates a provision for 4.7 years of housing within the District.

Figure 5.2: Extract from the Arun Authority Monitoring Report (December 2019; pages 22-23)

2019 5 Year Housing Land Supply based on our LP Adopted Stepped Trajectory - Large Sites
Commitments, NP Allocations and HELAA sites all include a 10% slippage reduction

Stepped Trajectory Housing requirement 2019-2023 (930 x 2 + 1310 x 3 + 864 Shortfall*)	6654
20% Buffer	1331
Total Requirement 2019-2023	7985
Large Site Commitments (as at 31 st March 2019 from WSCC RLA data – Appendix 2)	3730
Small Site Commitments (as at 31 st March 2019 from WSCC RLA data – Appendix 6)	277
Windfall allowance (as at 31 st March from WSCC RLA data – Appendix 6)	155

Made Neighbourhood Plan Allocations without planning permission as at 31 st March 2019 from HELAA – Appendix 5)	168
Deliverable HELAA Sites within built up area (if a HELAA site gained Planning permission after 31 st March 2019 it will show as an addendum to the large sites commitments)	169
Strategic Site Allocations (without PP as at 31 st March 2019 or committed after 31 st March 2019– Appendix 3)	1,450
Total Supply	7069
Supply in years	3.7

**Shortfall calculated as follows: Stepped Trajectory Requirement for years 2011 -2019 was 610 x 5 + 930 x 3 = 5840 Less completions for years 2011-2019 = 4976 = 864*

- 5.29 However, the calculations above do not consider an error which was identified for the five year period 2016/17 – 2020/21, which has since been reflected in the online version of adopted Local Plan. This figure has been amended from 930 to 1,120.
- 5.30 As a result, the stepped trajectory housing requirement for the period 2019-2023 and the housing shortfall for years 2011-2019 in Figure 5.2 are incorrect. A revised calculation for Arun's Five Year Housing Land Supply has been set out below.

Revised Calculations

- 5.31 The housing shortfall figure used within the Stepped Trajectory Requirement calculation was identified by Arun District Council as being 864 dwellings, based on the following methodology:

Figure 5.3: Extract from the Arun Authority Monitoring Report (December 2019; page 23)

Shortfall calculated as follows: Stepped Trajectory Requirement for years 2011 -2019 was 610 x 5 + 930 x 3 = 5840 Less completions for years 2011-2019 = 4976 = **864*

- 5.32 When considering the correct housing requirement for the period between 2017/18 – 2020/21 (1,120), the revised calculation would be as follows:

- $((610 \times 5) + (1,120 \times 3)) - (4,976) = \mathbf{1434 \text{ Shortfall}}$

- 5.33 On this basis, Figure 5.4 below sets out the revised Five Year Housing Land Supply calculation as should be at the time of the report's original publication.

Figure 5.4: Revised 5 Year Housing Land Supply Calculation

Stepped Trajectory Housing requirement 2019-2023 (1,120 x 3) + 1310 x 2 + 1434 Shortfall)	7414
20% Buffer	1482
Total Requirement 2019-2023	8896
Large Site Commitments (as at 31 st March 2019)	3730
Small Site Commitments (as at 31 st March 2019)	277

Windfall allowance (as at 31 st March 2019)	155
Made Neighbourhood Plan Allocations without planning permission as at 31 st March 2019	168
Deliverable HELAA Sites within built up area	169
Strategic Site Allocations (without planning permission as at 31 st March 2019)	1450
Total Supply	5,949
Supply in Years	3.3

5.34 Figure 5.4 therefore demonstrates that the Council has the provision for 3.3 years' worth of housing land in the District.

Impact on the adopted Local Plan

5.35 Paragraphs 5.30-5.33 have demonstrated that Arun District Council do not have a Five Year Housing Supply. Paragraph 11d of the NPPF can therefore be applied which confirms that permission should be granted for housing development 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.

5.36 The adopted Local Plan policies regarding the supply and distribution of housing development can therefore be deemed out of date. This position has been held by Arun District Council planning officers in the determination of two applications for residential accommodation in recent months, relating to application refs. AL/32/19/OUT and Y/62/18/OUT.

- 5.37 The proposed scheme should therefore be assessed against the other relevant policies of the NPPF to determine whether the proposal can be considered sustainable development. An assessment of the proposal against the policies of the NPPF and the adopted Local Plan is set out in Section 5 of this report.

Arun Housing and Economic Land Availability Assessment 2018 (March 2019 Amendments)

- 5.38 The Council's position on the site has changed since the submission of the previous Outline application, at which point the site was identified as deliverable within the 2017 HELAA. A copy of the HELAA assessment table has been provided in Appendix C. The HELAA suggested a total yield of 24 homes within the site. The suitability summary was as follows:

"Outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site is not considered suitable. From the information available, the risk of flooding has reduced to 2 & 3 based on the July 2016 SFRA so the site could now be achievable."

- 5.39 However, the latest HELAA, republished in March 2019, identifies the site as being Not Currently Developable (reference 5 – "Southdown Nursery (Former), Old Mead Road") despite no changes to the site or constraints that affect it.
- 5.40 It is worth noting that neighbouring land (HELAA refs 14 and 136) with the same planning and flood risk classifications were assessed as being deliverable. Both sites are outside the settlement boundary and are within flood zones 2 and 3, as per the application site. It is therefore considered that the application site should be similarly classified as deliverable.

Figure 5.4: Map showing HELAA Sites 14 and 136 with application site



Arun District Council Housing Delivery Test – Action Plan (June 2019)

- 5.41 The Government published Arun District Council's November 2018 Housing Delivery Test result in February 2019. This result was 91% and indicated a need for the Council to publish an Action Plan in order to identify barriers to housing delivery and measures to overcome them.
- 5.42 The Council published its Action Plan in June 2019 which set out actions being investigated in order to try to boost housing delivery. Of relevance to the application site, such actions include:
- Application of paragraph 11d of NPPF until 5 year housing land supply is re-established

- Invite applications from landowners/developers on 'deliverable' HELAA sites to re-establish 5 year housing land supply

Littlehampton Neighbourhood Plan (2014)

- 5.43 The site is located on the northern boundary of the Littlehampton Neighbourhood Plan, which was published on 5 November 2014.
- 5.44 The Neighbourhood Plan states in Policy 1 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.
- 5.45 Policies 2 and 3 identify locations for new housing. The discussion above (paragraphs 5.34 - 5.36 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.
- 5.46 Furthermore, as the Neighbourhood Plan is now over two years old, paragraph 11d of the NPPF can be applied and the impact of allowing development that conflicts with the Neighbourhood Plan cannot be viewed as significantly and demonstrably outweighing the benefits of the proposal.

Other Designations

- 5.47 The site lies within the Setting of Arundel.
- 5.48 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.

- 5.49 The majority of the site lies within Flood Zone 3a (high probability) which has a 1 in 200 or greater annual probability of coastal flooding without considering the presence of flood defence. Areas of Flood Zone 3b run long the eastern and northern boundary of the site, which encroach within the boundary in some areas.
- 5.50 The submitted Flood Risk Assessment confirms that this is largely due to flow exceedance graphic used for the Strategic Flood Risk Assessment but does not reflect the actual conditions within the site. As such, the site is considered to lie within Flood Zone 3a. This is also confirmed within the most recent HELAA Assessment (2018) which states that the flood risk would not exclude it from consideration.
- 5.51 A stretch of Flood Zone 2 runs along the western boundary.

Planning History

- 5.52 The site has been subject to four 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;
 - LU/375/17/PL – Change of use of land for the stationing of 25no. mobile homes for permanent residential occupation – Refused 28th March 2018;
 - LU/376/17/OUT – Outline application with all matters reserved for the demolition of a bungalow and outbuildings, and erection of up to 25no. dwellings, of which 30% will be affordable, with associated open space – Refused 2nd July 2018.

Lawful Use

- 5.53 The aforementioned Certificate of Lawfulness related to the entire application site and confirmed the lawful use to be residential.
- 5.54 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.
- 5.55 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...'

6 APPRAISAL

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

- Principle of Development
- Design and Appearance
- Open Space
- Flood risk and Drainage
- Ecology
- Heritage
- Amenity
- Transport and Highways

6.2 These issues are considered in further detail below.

Principle of Development

6.3 The application site lies outside the settlement boundary of Littlehampton and within the countryside, where development is restricted pursuant to Policy C SP1 adopted Local Plan.

- 6.4 However, as the Council are only able to demonstrate a 3.3 year housing land supply and the District is at less than 95% of their housing requirement per the Housing Delivery Test (as of February 2019), the planning application should be determined against paragraph 11d of the NPPF.
- 6.5 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 submitted Indicative Layout Plan incorporates a minimum of a 3 metre buffer from the toe of the bank to preserve the habitat, with open amenity space adjacent to this. An area of at least 22 metres would be retained between the bank and the nearest dwelling.
- 6.6 In relation to the social aspect of sustainable development, the proposal would provide much needed housing, including a contribution towards the provision of affordable dwellings, in an accessible location. The site is located adjacent to an existing residential area within 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.
- 6.7 In relation to the economic role of sustainable development, the construction phase would generate a number of jobs, whilst the new residents would increase spend in local shops and facilities helping to support the local economy. Local trades people would also be required for the maintenance of the dwellings and open space once occupied. The development would also generate Council Tax payments.
- 6.8 The proposal is therefore considered to constitute sustainable development in accordance with the NPPF.

- 6.9 The application site in its entirety has an established residential use, which was confirmed through the approval of a Certificate of Lawful Use in 2003. The site is also previously developed land as defined by the NPPF and does not fall under any environmental designation. The site is therefore not considered to best reflect the character of the surrounding designated area of countryside and can be better read on context with the neighbouring residential uses which lie in close proximity.
- 6.10 The proposed development is a more effective use of land which lies immediately adjacent to the settlement boundary and between two non-agricultural uses.

Design and Appearance

- 6.11 Planning policies and National Planning Practice Guidance support the efficient and effective use of land. Local Plan Policy D SP1 requires all development to 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. A context appraisal, context plan and an analysis of the site are required for major developments in addition to a Design and Access Statement.
- 6.12 Policy D DM1 relates to aspects of form and design quality and confirms that the Council will have regard to a number of key aspects in the determination of planning applications, including character, appearance, impact, innovation, adaptability, trees and landscaping, layout, density, scale and energy.
- 6.13 Policy DM2 requires internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs.

- 6.14 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.
- 6.15 Old Mead Road features a variety of house styles and sizes and is of varied character comprising mobile homes, chalet bungalows and two storey houses.

Figure 6.1 - Street Scene Image – View from Old Mead Road with Glenvilla to the left and Thornlea Park to the right



- 6.16 The dwellings will stand at three storeys in order to provide all accommodation above the flood level. The overall height of the dwellings will however be more comparable with a 2.5 storey house due to the ground floor levels being of lower height and the roofs being of shallow pitch.
- 6.17 It is acknowledged that the proposed dwellings will stand higher than the existing property and neighbouring mobile homes; however the impact on the streetscape of the area is not considered to be significant when seen from long distance viewpoints in Arundel, particularly when considering the forthcoming development of land to the south of Old Mead Road. Impacts on amenity have been addressed later in this section.

- 6.18 High quality and generous amounts of soft landscaping around the perimeter of the site will help to soften the appearance of the site and provide a buffer between the buildings and the surrounding countryside. The neighbouring solar farm and caravan parking facility adds to this buffer between the built-up area and the surrounding fields.
- 6.19 On this basis, the proposed dwellings are considered to have a negligible impact on the character of the Countryside in the vicinity of the site, which does not best reflect the open flood plain nature of the neighbouring strategic gap, and the Setting of Arundel Castle.

Open Space

- 6.20 1920sqm of open space would be provided at the rear of the site, including a children's play area. This equates to approximately 52sqm per resident (assuming the average household size is 2.4 people) which is in excess of the Council's Open Space and Recreation Standards. This area of land will provide a soft buffer between the proposed dwellings and the farmland to the north.

Flood Risk and Drainage

- 6.21 A reason for the refusal of the previous Outline planning application was as follows:

"The application site falls within Flood Zone 3... and the development type is classified as highly vulnerable... The submitted Flood Risk [Assessment] does not satisfactorily demonstrate that the development will be safe and appropriately flood resilient / resistant, and there is conflict with the National Planning Policy Framework and policy GEN11 of the Arun District Local Plan [2003]."

- 6.22 The site lies within an area classified as Flood Zone 3a at risk of flooding from tidal or fluvial sources but benefits from existing flood defences which protect the site up to the 1 in 200 year tidal flood event. The site is outside the area of the functional flood plain (Flood Zone 3b).
- 6.23 The proposed development will incorporate a sustainable drainage system which will discharge surface water at the existing Greenfield runoff rate into the existing watercourse.
- 6.24 Surface water runoff from 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 period up to and including the 1 in 100 year rainfall event with an allowance for climate change.
- 6.25 Foul drainage will be discharged to the existing discharge point from the site along Old Mead Road.
- 6.26 The submitted Flood Risk Assessment sets out a series of measures that have been designed into the development to manage flood risk within the site, including concrete suspended ground floors with voids/vents to allow water to pass through.
- 6.27 In response to comments made by the Environment Agency on the previous Outline planning application, floor levels have been raised to ensure that the finished floor levels are above the 1 in 200 year design flood, including consideration for climate change. Additional flood risk management features have also been recommended.
- 6.28 On this basis, the proposed development is suitable at this location and there are no significant flooding and drainage risks on site, or to the surrounding area as a result of the proposed scheme.

Ecology

- 6.29 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.
- 6.30 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.
- 6.31 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).
- 6.32 No further ecological constraints were noted within or adjacent to the site.

Heritage

- 6.33 The site lies within the setting of Arundel under Policy LAN DM2, which extends from Arundel down to the north of the Littlehampton West Bank Strategic Housing site. The Council seeks to protect views both towards the town and from elevated positions within Arundel which provide views across the river flood plain towards the coast.
- 6.34 The policy states that development will not be permitted within this area which would adversely affect views of the town, its castle, cathedral and its special setting. Any development should be of a high design standard that reflects the quality of the landscape and the setting of Arundel.

- 6.35 The site is located in between a caravan storage facility and residential area. The site is considered to contribute very little to the setting of Arundel and can be read as part of the existing settlement of Littlehampton.
- 6.36 The proposal includes landscape improvements which will act both as a buffer between the proposed dwellings and the surrounding countryside and minimise any impact on long distance views from Arundel. The proposal would be seen in the context of residential properties in the vicinity and the proposed landscaping would help to soften its appearance from public viewpoints. The allocation of land to the south of Old Mead Road for housing should also be considered.
- 6.37 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.
- 6.38 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 away from it.
- 6.39 There was no objection raised by the Council's Historic Advisory in response to the original Outline planning application, who noted that the "proposal would have little or no effect on the listed buildings, given their remoteness from the proposal site".

Amenity

- 6.40 One of reasons for the refusal for the original Outline planning application was as follows:

'...It has not been satisfactorily demonstrated that the proposal would not give rise to an unneighbourly form of development which would be prejudicial to the amenities and environment of the locality in conflict with policy GEN7 of the Arun District Local Plan'.

- 6.41 The layout has significantly changed from the previously submitted scheme. Houses are now sited at least 18 metres away from Thornlea Park properties with additional landscaping proposed along the shared boundary. The distance between the nearest dwelling and the side elevation of Glenvilla is now 12 metres. Such distances are commensurate with other schemes granted consent within the Arun District,

Transport and Highways

- 6.42 The proposed access will utilise the existing access point which will serve a 6 metre wide road with a continual pavement on one side and footways on the other.
- 6.43 The site is located almost at the very end of Old Mead Road with just one dwelling and a caravan storage facility located beyond it. Therefore traffic in the vicinity of the access is very limited.
- 6.44 Secure cycle parking would be provided within each plot or as a communal secure cycle store.
- 6.45 The layout plan shows 35 parking bays (14 allocated) in addition to 22 parking spaces provided within garages. This equates to 36 allocated spaces and 21 unallocated spaces, which is as required by the WSCC parking demand calculator (attached at Appendix A).

7 SUMMARY

- 7.1 The proposed development would provide 22 x 1, 2, 3 and 4 bed dwellings on a site in close proximity to a wide range of services and facilities in Littlehampton.
- 7.2 Arun District Council are not able to demonstrate a five year housing land supply, which means that paragraph 11d of the NPPF is engaged and the proposal falls to be determined against the presumption in favour of sustainable development.
- 7.3 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. The proposal is sufficiently designed to ensure that the site can withstand periods of flooding.
- 7.4 The proposal would also provide much needed housing, including affordable housing, in an area with an identified shortage.
- 7.5 The dwellings 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.
- 7.6 The proposal is considered to provide significant social, environmental and economic benefits in accordance with paragraph 11d of the NPPF. We therefore consider planning permission should be granted.

Appendix A



Claire Bartlett
Batcheller Monkhouse
New Bartram House
3-5 Swan Court
Station Road
BN120 1PS

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF
Planning General Enquiries
Tel: (01903) 737756 Fax: (01903) 730442
Dx: 57406 Littlehampton
Minicom: 01903 732765
e-mail: planning@arun.gov.uk
website: www.arun.gov.uk/planning

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

Access

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:

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"(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 28 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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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 Lyminster 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 28 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 Governments 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

Appendix C

HELAA 2017 Assessment of the Application Site

HELAA Assessment Summary Table – Deliverable Sites

Reference	5
NLPG	100062654502
Site Address	Southdown nursery (former), Old Mead Road
Grid ref	502158.12-104251.55
Parish Group	Littlehampton & Surrounding Area
Parish	Littlehampton
Settlement	Wick
Site Area (ha)	0.99
Net Developable Area (ha)	0.79
Viability Typologies	4-MG25
Description of site	Fairly overgrown plot with a number of structures including a bungalow and sheds (to the south)
Existing use	Horticulture.
Constraints	Flood zone 2 & 3a
Potential use for evaluation	Residential or Camp Site
Suitability Summary	Outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site is not considered suitable. From the information available, the risk of flooding has reduced to 2 & 3s based on the July 2016 SFRA so the site could now be achievable.
Availability Summary	Promoted May 2016 as available within 5 years
Achievability Summary	Considered to be achievable based on the Arun Viability Assessment Report 2016
Current Status	Deliverable

Projected Potential Yields

Suggested Density			Suggested Total Yield			Promoted/Planning Application suggested total yield	
30			24				
2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
0	24	0	0	0	0	0	0
2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	
0	0	0	0	0	0	0	

HELAA 2019 Assessment of the Application Site

HELAA Assessment Summary Table - Not Currently Developable - Residential Site

Reference	5
Site Location	Southdown nursery (former), Old Mead Road
Parish	Littlehampton
Grid Reference	502158 - 104252
Strategic Allocation Site	No
Neighbourhood Plan Site	No
Site Area	0.99
Net Developable Area	0.79
Viability Typologies	4 MG25
Description of Site and Existing Use	Fairly overgrown plot with a number of structures including a bungalow and sheds (to the south). Mobile home site to the west. Horticulture.
Settlement	Littlehampton
Local Plan Area	Greater Littlehampton Urban Area
Existing Use	Residential
Potential Use for Evaluation	Residential or Camp Site
Constraints	Flood zone 2, 3a cover the whole site & 3b covers the North East section of the site
Suitability Summary	Quite a way from the settlement boundary does not form a natural extension of the built up area. Currently development on this site would contravene policy. From the information available, the risk of flooding has reduced based on the July 2016 SFRA but the whole site is covered by flood risk 2 and 2a and part of the site is risk 3b so flood risk is an issue but the main reason for it not being considered suitable at this time is the location.
Availability Summary	Promoted July 2019 as available within 5 years, recent applications refused for 25 mobile homes under LU/375/17/PL and 25 dwellings under LU/376/17/CUT.
Achievability Summary	Considered to be achievable based on the Arun Viability Assessment Report 2016
Current Status	Not Currently Developable

Land at The Bungalow, Old Mead Road, Littlehampton