

Land South of Littlehampton Academy
Littlehampton
West Sussex

Planning Statement

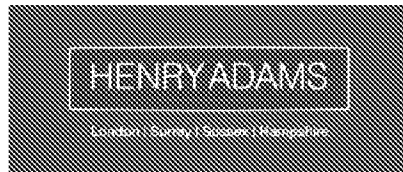
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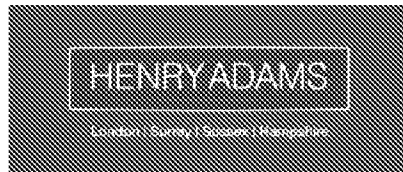
1.0 Introduction

- 1.1 This statement has been prepared on behalf of West Sussex County Council in support of their application for the redevelopment of land south of Littlehampton Academy.
- 1.2 This statement seeks to deal solely with matters of planning policy and is accompanied by a separate Design and Access statement, which has been prepared by the Architects, to demonstrate how the proposed development will reflect the overall context of the site and the character of the area.

Proposal

- 1.3 The application is an outline application for 68 residential units with access for consideration at this stage. It is accompanied by a separate Transport Planning Statement, which includes a Safety Audit and Framework Travel Plan to address the access issues arising from these proposals. The accompanying indicative layout illustrates a scheme comprising 12 x 2-bed flats, 16 x 2-bed houses, 36 x 3-bed houses and 4 x 4-bed houses. There will be a total of 139 parking spaces equating to 2.04 spaces per dwelling.
- 1.4 A total of 13 dwellings will be provided for affordable housing. These are identified on the accompanying layout.
- 1.5 All other matters are reserved for future consideration.
- 1.6 There will be two access points into the site, one from the west, off the new link road and one from the east off Elmgrove Road. These two roads will serve two distinct elements of the development with no through road across the site, access across the full site being limited to pedestrians.
- 1.7 The school buildings that previously occupied the site ceased to be used during 2012 when the new Academy was completed and opened in September 2012. The majority of the buildings were demolished between March and April 2013. Since then the site has remained vacant and unused.

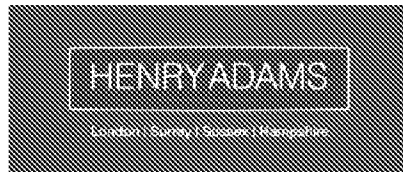
Site description



- 1.8 The application site is 2.42 hectares of previously developed land located within the Littlehampton settlement boundary. It is located immediately to the south of the new Academy, east of Fitzalan Link Road and west of Elmgrove Road. There is a public right of way extending along the site's southern boundary with a substantial public park and play area immediately beyond.
- 1.9 Having previously been occupied by the buildings and facilities of Littlehampton Community College it is now bare and vacant following the demolition of all but one of the buildings. The caretaker's house remains to be demolished shortly. It is a generally level site with few features of landscape significance.

2.0 Relevant Planning Policy

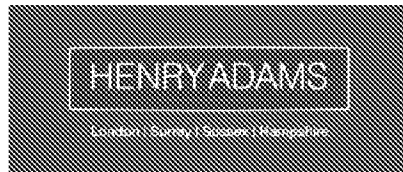
- 2.1 This statement considers how the proposed development of this site conforms to the policies and objectives of the National Planning Policy Framework (NPPF). The government's policy contained in the NPPF was issued and came into effect on 27 March 2012.
- 2.2 This application will also be considered against the statutory development plan for this area which consists of the saved policies contained within The Arun District Local Plan 2003, adopted on the 17th April 2003. The application site is situated within the built-up area boundary and is not subject to any further policy designations. Arun is currently in the process of preparing its new Local Plan which will cover the period 2011-2029. However, as an emerging document that continues to proceed through the consultation process towards an examination in public, the weight that can be afforded the policies therein is limited. As such this statement focuses on the relevant saved policies contained in the Arun District Local Plan 2003 and the NPPF.
- 2.3 In addition to the Local Plan and the NPPF there are a number of relevant Supplementary Planning Guidance (SPG) documents that have been prepared by the Local Planning Authority to provide additional advice and guidance on specific planning issues within the district. They should be read in conjunction with the relevant policies in the Arun District Local Plan 2003. Although they are non-statutory documents, they are a material consideration in the consideration of planning applications.



- 2.4 The most relevant SPGs are the Open Space and Recreation Standards - October 2000 and Parking Standards - October 2000. In addition, on the 21st February 2007 Full Council agreed to use new standards for affordable housing which were in line with PPS3 (now superseded by the NPPF). It was agreed that after 1st April 2007 all applications for affordable housing should be considered against the new standards.
- 2.5 These SPGs are considerably out of date and have in large been superseded by the NPPF. However, consideration is given to them where they support policies that are saved from the 2003 Local Plan.
- 2.6 Littlehampton Town Council is also in the process of preparing the Littlehampton Neighbourhood Plan. The Pre-Submission version has been reviewed in the preparation of these proposals.

3.0 The National Planning Policy Framework

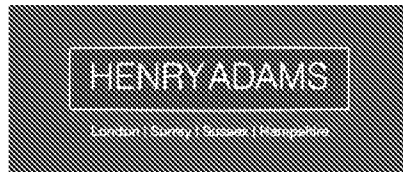
- 3.1 The NPPF notes that the purpose of the planning system is to contribute to the achievement of sustainable development and details a presumption in favour of sustainable development (para. 14 & 197).
- 3.2 Paragraph 11 acknowledges that Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 3.3 One of the most relevant objectives of the NPPF is to ensure that each district has a supply of land to meet housing need for at least 5 years. Paragraph 47 requires LPAs to use their evidence base to ensure that their Local Plan meets the full needs for the market and affordable housing and identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land.
- 3.4 Housing applications should be considered in the context of the presumption in favour of sustainable development (para. 49).



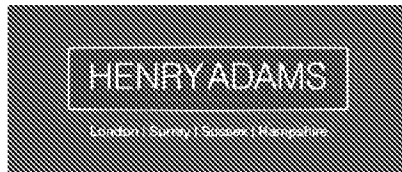
- 3.5 The NPPF also attaches great importance to the design of the built environment. Paragraph 56 notes that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 3.6 Great weight is placed on the need to reuse previously developed land. Paragraph 111 notes that decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- 3.7 The NPPF (para. 32 bullet 3) says that highway objection should not be raised to development proposals unless severe impact would be caused.

4.0 Arun District Local Plan 2003

- 4.1 Local Plan policy GEN1 seeks to ensure that all new development takes full account of the need to protect the environment so that present-day demands do not compromise the ability of future generations to meet their own needs or enjoy a high quality environment.
- 4.2 Policy GEN2 (Built-up Area Boundary) permits development and redevelopment within the built up area boundaries, subject to other policies in the Local Plan.
- 4.3 Policy GEN4 states that consideration will be given to the effect the proposals will have on demand for transport and that the Local Planning Authority will need to be satisfied that any identified potential travel problems arising from a proposal will be resolved.
- 4.4 Policy GEN7 (The Form of New Development) requires new development to make a positive contribution to the quality of the environment. This policy requires development to make efficient use of land and in the case of new residential development, achieves densities of at least 30 dwellings per hectare. It should respond positively to the identified character of the site and area while promoting sustainable development and protecting the amenities of neighbouring properties. It details a requirement for parking to be provided in accordance with Policy GEN12 and Appendix 2.



- 4.5 Policy GEN8 resists development unless the infrastructure or facilities made necessary by the development are available or will be provided at the appropriate time.
- 4.6 Policy GEN9 relates to foul and surface water drainage. It states that planning permission for development which will materially increase foul and/or surface water discharges will be resisted unless the Local Planning Authority (LPA) is satisfied that either adequate drainage capacity existing or can be provided as part of the development. There is also a requirement for Sustainable Drainage Systems (SUDs) to be considered as an alternative to conventional drainage options where appropriate.
- 4.7 Policy GEN10 Tidal Flooding and Coastal Defence states that 'planning permission will be refused for development which would be at an unacceptable risk of tidal flooding and/or where proposals are detrimental to the integrity of tidal defences or the ability to maintain or improve them.'
- 4.8 Policy GEN12 (Parking in New Development) resists the provision of parking in excess of the standards detailed in the Local Plan. The maximum parking standards detailed in Appendix 2 are as follows:
- Estate development with 16 or more units:
- Flats with 3 or more habitable rooms – 1.7 spaces
 - Smaller houses – 2.2 spaces
 - Larger houses – 3.2 spaces
- GEN12 notes that the LPA may seek lower provision for developments proposed in town centres and other areas accessible by other means of transport.
- 4.9 Policy DEV17 (Affordable Housing) details a requirement for new development of 25 or more units to provide affordable housing. A provision of 30% will generally be sought from appropriate sites.
- 4.10 Policy GEN20 (Provision of Public Open Space within New Development) requires the provision of public open space to the minimum standard of 2.4 hectares per 1,000 people.



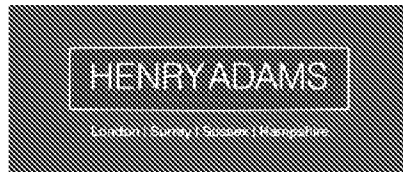
- 4.11 Policy GEN30 resists development that would adversely affect animal and plant species protected by law. Where development is permitted, the developer will be required to take steps to secure the protection of such animals and plants.

5.0 Supplementary Planning Guidance

- 5.1 The Open Space and Recreation Standards SPG supports Local Plan policy GEN20. It details a requirement for 24m² per person occupying new development. As it is not possible to be certain how many people will occupy the development at any given time, it is estimated that 2.4 people will occupy each dwelling. As such there will be a need for 3,917m² of open space on a development of 68 residential units. The SPG confirms that this should include children's play areas and informal recreation.
- 5.2 The Parking Standards SPG offers detailed support to Local Plan policy GEN12. It notes that the parking standards as to be applied as maximum standards. On new developments of more than 15 units the requirement is 2.2 spaces per 1, 2 and 3-bed dwelling and 3.2 spaces per 4-bed. This equates to a maximum of 153 spaces required for a development of 64 x 1, 2 and 3-bed dwellings and 4 x 4-bed dwellings as proposed.
- 5.3 The New Standards for Affordable Housing seek to bring policy DEV17 in line with PPS3 in order to meet the shortage of affordable housing being provided in Arun District. As such the site threshold for provision is reduced from developments of 25 units to those for 15 units. The requirement for 30% affordable housing provision remains unchanged.

6.0 Neighbourhood Plan

- 6.1 The Littlehampton Neighbourhood Development Plan Pre-Submission Consultation was published by Littlehampton Town Council in June 2013. The Regulation 15 and 16 consultation closed in January 2014.
- 6.2 The application site, known as "Elm Grove Road" in the Neighbourhood Plan, is allocated in Policy 4 – Housing Site Allocations, for up to 70 dwellings comprising primarily 2, 3 and 4 bedroom houses to be delivered in the period to 2019.



6.3 The Neighbourhood Plan notes that this site “is suited to medium density housing development given the proximity of similar uses and its compatibility with an adjoining education facility. Development will be accessed from the new Fitzalan Link road to the west, not Elm Grove Road. A scheme will be required to include public open space as an extension to the existing public open space off Rosemead and to contribute to achieving a significant green space along the Link road”. It is also required, under Policy 4 to deliver 30% affordable housing unless there is clear evidence to justify a smaller proportion to ensure a viable development scheme.

6.4 Policy 18 of the emerging Neighbourhood Plan relates to the Fitzalan Link Road. This policy currently requires the proposed Fitzalan Link Road between East Street and the North Littlehampton to enable access to the housing allocations at Elm Grove (the application site) and Land North of Littlehampton Academy, to be of a design that can satisfactorily provide for the development of those sites and be completed prior to the occupation of the dwellings on either of those sites.

7.0 Community Consultation

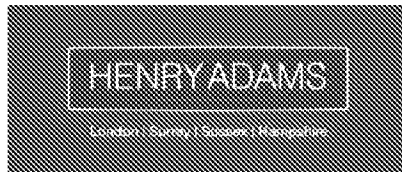
7.1 This application has been prepared over many months with discussions taking place locally that have seen the proposals evolve.

7.2 The scheme has been discussed at the North Littlehampton Members’ Steering group which includes Littlehampton Town Council and various amendments have been made to address criticisms raised.

8.0 Application Assessment

Principle

8.1 In assessing this application against the objectives of the NPPF it is clear that the site’s location and previously developed status score highly in contributing towards achieving a sustainable development. It is located within the settlement boundary, as required in policy GEN2, where Local Plan policy GEN7 supports the principle of residential development and encourages new development to make efficient use of land achieving densities of at least 30 dwellings per hectare (dpha). This development of 68 residential units will achieve a density of 28 dpha. Although this density will be

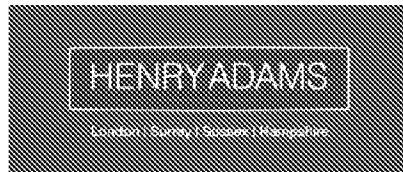


slightly below the standard outlined in Local Plan policy GEN7, which seeks 30 dpha, the number of units reflects the emerging Neighbourhood Plan's requirement for less than 70 units on the site. It is considered that at this level the development will be sympathetic to the density of other residential development nearby and the general character of the area.

- 8.2 Although an outline application with only the number of units and the access arrangements for consideration at this stage, care and consideration has been given to the indicative layout to demonstrate how a development of 68 residential units might be constructed to respond positively to the identified character of the area, the need for appropriate drainage arrangements and the presence of utilities equipment. The accompanying Design and Access Statement discusses the design in further detail. This statement demonstrates how this development can make a positive contribution to the quality of the environment in accordance with Local Plan policy GEN7 (The Form of New Development).

Affordable Housing

- 8.3 It is recognised that it is necessary to provide affordable housing on the site and/or make a financial contribution towards its provision elsewhere.
- 8.4 13 of the 68 residential units have been identified for the provision of on-site affordable housing, equating to just over 19% provision. These units are shown on the indicative site layout as being located at the eastern end of the site with access off Elmgrove Road.
- 8.5 The provision of affordable housing on site will be less than normally sought in order to reflect and allow for the provision of a financial contribution being made by the applicant, West Sussex County Council, towards the North Lymminster bypass.
- 8.6 The scheme, although indicative, has been carefully designed having regard for the character of nearby development, and with the affordable housing package proposed, is considered to be deliverable given current market conditions..
- 8.7 Further details of how the scheme, including affordable housing package, has been prepared, can be provided if necessary.

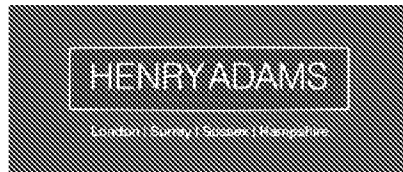


Drainage

- 8.8 This application is accompanied by a Flood Risk Assessment (FRA) which considers the potential for the site to flood from various water sources.
- 8.9 The application site is situated in Flood Zone 1, defined by the Environment Agency as land having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). Surface water drainage will be discharged to ground via soakaway utilising boreholes into the underlying chalk stratum as was constructed on the adjacent Littlehampton Academy. Foul drainage will be discharged to the public foul sewer at the southern site boundary.
- 8.10 Although it has now been cleared of the former school buildings, the quantity of buildings/hard surface occupying the site will be less with the proposals (as detailed in the indicative layout) than from the site's former use. The FRA confirms that the site is not at risk of flooding from tidal or fluvial sources, overland flows or from groundwater. As such these proposals meet the requirements of Local Plan Policies GEN9 and GEN10.

Parking and Highways

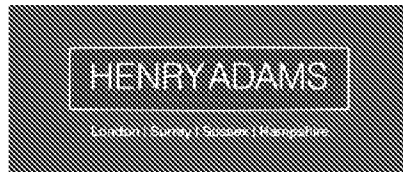
- 8.11 As this application does not seek approval for the internal site layout the parking arrangements are not for consideration at this stage. However, consideration has been given to the parking when the indicative site layout was prepared. These arrangements are considered in the accompanying Highway Planning Statement which considers the level of provision to be achievable, acceptable and in conformity with the requirements of Local Plan policy GEN12.
- 8.12 RGP has investigated the transport planning considerations relating to the proposed residential development of land to the south of the Littlehampton Academy, to provide a total of 68 residential dwellings, parking and associated access works. The development proposals are considered through this Transport Planning Statement on their own merits and also, importantly, in light of the consented North Littlehampton Strategic Development and associated strategic highway improvements to the Fitzalan Link Road.



- 8.13 The Transport Planning Statement concludes that the site is in a sustainable location with access to a good range of services and facilities. The accompanying Travel Plan will further assist in facilitating the uptake of sustainable travel patterns now and in the future in accordance with Local Plan policy GEN4.
- 8.14 The site access proposals are supported by a Stage 1 Road Safety Audit and Designer's Response to address all issues raised through the Audit. The Transport Planning Statement notes that the development would not generate a significant increase in traffic on the local highway network and would not result in a material impact in the operation of local junctions or severe residual impacts either now or in the future. With 141 parking spaces to serve a development of 68 residential units, the proposals provide sufficient car parking to cater for all anticipated vehicles on site in accordance with current guidance and Local Plan policy GEN12.

Neighbourhood Plan

- 8.15 Although the Neighbourhood Plan is not yet adopted, consideration has been given to the emerging policies therein. In response to the policy objectives of the emerging Neighbourhood Plan the number of proposed units has been kept below 70 and will comprise primarily 2, 3 and 4 bedroom units. In addition, an amenity area will be provided centrally within the site to link, visually, with the public park / play area to the south and an additional open area, in the form of a paved square, is also provided.
- 8.16 The indicative layout illustrates how the majority of the development will be accessed from the Fitzalan Link Road to the west with just 13 units accessed from Elmgrove Road to the east. In taking this approach to providing two access points, access across the site would be restricted to prevent all units from using both access points thereby limiting the usage of the eastern access to just 13 smaller units and avoiding the possibility of the site being used as a rat run. Pedestrian links and visual links will be retained through the site to avoid the appearance of two separate developments.
- 8.17 Policy 18 of the Neighbourhood Plan currently requires the proposed Fitzalan Link Road between East Street and the North Littlehampton to enable access to the housing allocations at Elm Grove (the application site) and Land North of Littlehampton Academy, to be of a design that can satisfactorily provide for the development of those sites and be completed prior to the occupation of the



dwellings on either of those sites. The development of these two areas would not have a severe cumulative impact on the operation (capacity or safety) of the local highway including the permitted layout of the Fitzalan Link Road and this needs to be evidence led rather than a blanket ‘no development until....’ as there is then no control (and indeed a ransom) on any development of these two sites.

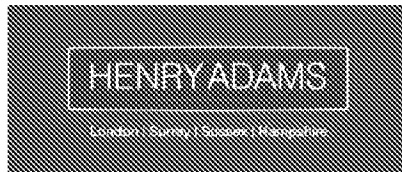
- 8.18 The accompanying Transport Planning Statement demonstrates how the development of this site with access arrangements as detailed will not have an adverse impact on the capacity or safety of the local highway network and as such there is no justification for delaying the approval of these proposals. This application and any future application for land North of Littlehampton should be considered on their own merits.

Open Space

- 8.19 Guidance on the requirements for the provision of open spaces in developments of this scale is provided in the Open Space and Recreation Standards SPG. As this is an outline application with the layout of development being a reserved matter for future consideration the precise quantity of open space provided cannot be calculated at this stage. However, the indicative layout accompanying the application illustrates how informal open space might be required.
- 8.20 The application site is located immediately adjacent to a substantial area of public open space and a children’s play area with only a public footpath separating the two. This public open space is protected under Local Plan Policy Area 5 – Protection of Open Space. This policy seeks to protect public and private open spaces, playing fields, outdoor sports facilities and children’s play facilities. In light of this proximity and ease of access to these protected public facilities it is appropriate for the open space standards to be reduced in connection with this development.

Ecology

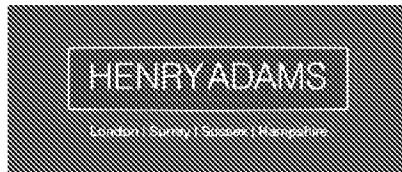
- 8.21 The application site is devoid of any significant landscape features or buildings, other than the former caretaker’s house, but having been left vacant for considerable time the applicant has considered the possibility of their development proposals adversely affecting any protected species.



- 8.22 The County Council's Senior Ecologist has undertaken an Interim Ecological Scoping Survey of the site. This survey concluded that there is no additional need for specialist surveys.
- 8.23 Following an internal inspection of the caretaker's house it was established that there is no evidence of current or historical use of the house by bats.
- 8.24 In respect to reptiles, a previous survey in 2010 found a single male slow worm. Given this limited population, short passage of time, limited disturbance and lack of suitable habitat it was concluded that this status is unlikely to have changed.
- 8.25 In order to avoid conflict with protected birds it is recommended that vegetation should be cut back but not cleared until weather warms in spring and that complete site clearance be undertaken in the presence of a consultant utilising a destructive search methodology.
- 8.26 There are no other protected species expected to be present.
- 8.27 In accordance with Local Plan policy GEN30 it is recognised that the developer will be required to take steps to secure the protection of protected animals and plants. To that end, the applicant makes the following statement of intent:
As part of the reserved matters approval of landscaping, open space and use of native species will be used. Opportunities for planting native species along open space margins and boundaries will be taken. Nest boxes will be provided within the site and a landscape enhancement plan will be submitted.

Planning Obligation

- 8.28 The applicant recognises that the development will lead to the requirement to contribute towards the provision of local services and affordable housing.
- 8.29 The application is accompanied by a draft S106 utilising Arun District Council's template and incorporating affordable housing specific clauses. The provision of affordable housing on site will be less than normally sought in order to reflect and allow for the provision of a financial contribution being made by the applicant towards the North Lyminster bypass.



8.30 This draft S106 will be subject to change once the precise requirements become known throughout the application process. However, given that this is an outline application with only the number of units and access arrangements for consideration at this stage, it is anticipated that many of the contributions will be calculated through a formula in the S106 when the numbers of bedrooms are defined at the reserved matters stage.

9.0 Conclusion

9.1 It is the applicant's assertion that a development can be provided here of high quality that is secure, sustainable and deliverable by making use of a previously developed site within the Littlehampton built up area.

9.2 Although in outline form with only access arrangements for consideration at this stage, this application and accompanying documents demonstrate how a suitable layout can be achieved to accommodate 68 residential dwellings that respect the general form of development in the area, provide good access to local services and facilities and make efficient use of the land.