

Planning, Design & Access Statement

**Full Planning Application for the Erection of a
Semi-Detached Building, Comprising 2 x 3 Bedroom House with
Associated Parking and Landscaping Works**

**On Land Adjacent to Toddington Lane Farm Cottages,
Toddington Lane, Littlehampton, West Sussex, BN17 7PP**

Prepared for

Helg Properties Ltd

Prepared by

Peter Young BSc (Hons) MA MRTPI

February 2021

Version - 1.1

Contents	Page
1. Introduction	1
2. Site & Surroundings	2
3. History	2
4. Planning Policy	2
5. National Planning Policy Framework	2
6. Arun District Local Plan	3
7. Littlehampton Neighbourhood Plan	4
8. Arun Design Guide SPG	4
9. Housing Land Supply	5
10. Proposed Development	5
11. Material Planning Considerations	6
12. Summary	11

1. INTRODUCTION

- 1.1. We are instructed by Helg Properties Ltd to submit a full planning application for the erection of a three unit scheme on land adjacent to Toddington Lane Farm Cottages, Toddington Lane, Littlehampton, West Sussex, BN17 7PP. The application is seeking consent for the erection of a semi-detached building, comprising 2 x 3 bedroom house with associated landscaping and parking works.
- 1.2. The application site is located to the north of Littlehampton and is within the planning boundary. The scheme was subject to pre-application discussions, reference PAA/67/19, which was submitted to Arun District Council (ADC) in June 2019, with a response provided in January 2020. The pre-application scheme envisaged 4 units on the site, however, Officers felt this was over-development. As a result of these comments, the scheme has been reduced by 50% to a 2 unit scheme and the proposed building made notably smaller.
- 1.3. The site is located to the north of the Brighton - Littlehampton train line and there are neighbouring houses to the east and west. To the north of the site is a 10 house scheme that was recently permitted on appeal (ref. APP/C3810/W/18/3197149). The building work on this site is largely complete and access to the application site would be through the roadway constructed for this scheme.
- 1.4. This application is submitted with a number of supporting documents which were specified as necessary at the pre-application stage. This includes: Noise/Vibration Assessment; Preliminary Ground Contamination Report; Preliminary Ecological Appraisal; Transport Statement; and Construction Management Plan.
- 1.5. This statement should be read in conjunction with the following plans and documents:
 - Proposed Tracking Plan, Drawing No. 2.01 Rev A;
 - Proposed Elevation and Floor Plans, Drawing No. 2.01 Rev A;
 - Site Location and Proposed Block Plan, Drawing 2.03 Rev A;
 - Proposed Site Layout Plan, Drawing No. 2.04 Rev A;
 - Design & Access Statement;
 - Noise & Vibration Assessment;
 - Transport Statement;
 - Construction Management Plan;
 - Preliminary Ecological Appraisal;
 - Preliminary Contamination Report; and
 - CIL Questions.
- 1.6. This Statement sets out relevant planning policy, planning history, and assesses the scheme in accordance with the requirements of the Development Plan and other material considerations, including the National Planning Policy Framework (NPPF). It has been prepared having regard to the

Town & Country Planning (Development Management Procedure) (England) (Amendment) Order 2015 and guidance contained within the Planning Policy Guidance (PPG).

2. SITE & SURROUNDINGS

- 2.1. The site comprises a vacant plot of land consisting of hardstanding and scrub, which is approximately 0.05 hectares in size. It is generally flat, with mixed boundary treatment to the east, south and west. The north of the site is open and includes vehicular access.
- 2.2. There is some limited hedging around edges of the site, but it is a developed, brownfield site. To the east is a terrace of neighbouring dwellings (Toddington Lane Farm Cottage) and associated garden space. To the west are some small commercial buildings and further east of these is a new housing development.
- 2.3. To the north-east of the site there is a plot of land which consists of scrub and hardstanding, with a disused commercial unit, and an open-sided metal structure in the centre of the site. This received planning permission at appeal in January 2018 for the erection of 10 dwellings (ref. LU/162/17/PL).
- 2.4. To the north-west side of the site, there is a small industrial estate known as 'Hollyacre' which currently consists of a range of business activities, including a scrap/waste dealer, builders store and window manufacturer. This plot received planning permission (ref. LU/116/13) in 2013 for the erection of 63 dwellings.

3. HISTORY

- 3.1. There is no recent history for the site.

4. PLANNING POLICY

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan comprises the Arun District Local Plan (ADLP) 2019 and the Littlehampton Neighbourhood Plan (LNP) 2014.
- 4.2. Material considerations include the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). It also includes local supplementary guidance such as the North Littlehampton Strategic Area Masterplan (NLSAM).
- 4.3. ADC have been working on a Design Guide, which once adopted will be a Supplementary Planning Guidance (SPG). This would be a further material consideration. It has not yet been adopted, but this is anticipated soon.

5. NATIONAL PLANNING POLICY FRAMEWORK

- 5.1. The revised version of the NPPF was released on 24 July 2018 and the guidance contained therein came into effect immediately. An amended version was then released in February 2019. It sets out the Government's planning policies for England and how these are expected to be applied.

5.2. The guidance reconfirms the aims of sustainable development which comprise economic, social and environmental aims. For the purposes of this pre-application, the following Paragraphs were considered relevant to the proposal:

- 7, 8, 9, 10, 11, 12, 38, 47, 48, 50, 55, 59, 61, 63, 65, 66, 68, 73, 103, 109, 117, 118, 122, 124, 127, 130 and 180.

6. ARUN DISTRICT LOCAL PLAN

- 6.1. The Arun District Local Plan (ADLP) was adopted in July 2018 and outlines all key development management and strategic policy for the District. The following Policies are deemed material to this submission.
- 6.2. Policy SD SP2 - Built-Up Area Boundary states: *“Built Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built-Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.”*
- 6.3. Policy H SP1 - The Housing Requirement confirms a requirement for net additional 20,000 homes (2011/12 - 2030/31).
- 6.4. Policy H SP2 - Strategic Site Allocations outlines a series of matters that development within strategic areas should meet, including design, access, connectivity and landscaping that is appropriate to the local area.
- 6.5. Policy H DM1 - Housing Mix states: *“The Council will seek a mix of dwelling types and sizes, to include affordable housing units, that adhere to the latest Homes and Communities Agency (37) design guidance.”*
- 6.6. Policy D SP1 - Design states: *“All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development.”*
- 6.7. Policy D DM1 - Aspects of Form and Design Quality outlines 11 key areas individual schemes should respond to, including bulk, mass, materials, height, detailing, amenity, density and scale issues.
- 6.8. Policy D DM2 - Internal Space Standards states: *“The planning authority will require internal spaces to be an appropriate size (having regard to the exceptions that may apply as referred to in paragraph 13.3.4) to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance.”*
- 6.9. Policy QE SP1 - Quality of the Environment states: *“The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not*

have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.”

- 6.10. Policy QE DM1 - Noise confirms that sites which could be affected by train noise, must be accompanied by the appropriate Noise Assessment and mitigation.
- 6.11. Policy T SP1 - Transport and Development states: *“To ensure that growth in the District strengthens Arun’s economic base, reduces congestion, works to tackle climate change and promotes healthy lifestyles; the Council will ensure that development: provides safe access on to the highway network; contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network.”*

7. LITTLEHAMPTON NEIGHBOURHOOD PLAN

- 7.1. The Littlehampton Neighbourhood Plan (LNP) was adopted in 2014 and is now some 5 and half years old. It includes specific guidance for developments within Littlehampton. The following are deemed material to this submission.
- 7.2. Policy 1 outlines the Presumption in Favour of Sustainable Development, which sets the Development Plan in line with National Guidance.
- 7.3. Policy 22 - Design of New Development, seeks to ensure schemes achieve appropriate layouts, access to parking and other accessibility requirements.

8. ARUN DESIGN GUIDE SPG

- 8.1. The Arun Design Guide (ADG) remains unadopted guidance, but could be adopted during the course of this application. It has therefore been considered as part of the submission.
- 8.2. The guide outlines a series of overriding design objectives, including:
 - Local Distinctiveness, Character and Identity;
 - Cohesive and Vibrant Neighbourhoods;
 - Diversity;
 - Ease of Movement;
 - Accessibility and Inclusion;
 - Legibility & Integration;
 - Adaptability and Future Needs;
 - Safety, Security & Crime Prevention;
 - Efficient Use of Natural Resources;
 - Innovation;
 - Climate Change and Sustainability;

- Good Streets and Spaces; and
- Well Designed Buildings.

8.3. In particular, reference has been made to Chapter H - Amenity Space, Chapter P - Infill Development and Chapter S - New Homes.

9. HOUSING LAND SUPPLY

9.1. The Arun District Council (ADC) Authority Monitoring Report (December 2019) states the Council have a 3.3 year land supply, which has reduced from a 3.7 year supply in the previous AMR. This indicates that the supply is worsening in the district.

9.2. The AMR also confirms that that ADC have significantly under supplied against their housing target over the previous 3 years. The LPA therefore must impose a 20% buffer. Since the AMR was published, the 2020 Housing Delivery Test has been published (February 2020). This confirms that since last year, the delivery rate has dropped from 68% to 61%. This confirms the 20% buffer remains in the place and that delivery is slowing.

9.3. ADC have therefore not delivered enough housing in recent years, nor are projected to do so in the coming years. This means the Development Plan and associated SPG's are deemed to be out of date, but that does not mean they carry no-weight in the decision making process.

10. PROPOSED DEVELOPMENT

10.1. The application is seeking approval for the erection of a semi-detached building, comprising of 2 x 3 bedroom houses. The scheme would have a north/south axis, with the front entrances facing to the north. Parking would be across the frontage and include 2 spaces for each unit and 1 visitor space. The frontage would also include bin/recycling stores which would be landscaped into the site and pedestrian access to the buildings.

10.2. The proposal has been designed to match one another. The house design echoes the dwellings approved on the site to the north, with a similar shaped building form, height and mass.

10.3. The development would be clad in a multi-stock brick, with quoin-work detailing between the floors and above the windows. The roofs would be pitched and clad with cement slate tiles. Each dwelling would have a GIA of some 98 sq.m.

10.4. The 3 houses would have a pitched roof, with front facing gable. Entrances would be on the north elevation and include a rain screen porch. At ground floor they would include a hall, W/C, kitchen and combined living/dining space. The first floor would include a master bedroom with en-suite, 2 bedrooms and a family bathroom. Both units would have access to a front and rear gardens and the western unit would also enjoy a side garden. Both gardens would have rear access.

10.5. Both gardens would have bike stores large enough for three bikes. The garden space would be contained by 2m high close board fencing, which would increase to 2.2m in height at the southern end of the site. This taller fencing would be acoustic, matching the acoustic performances outlined in the Acoustic Report.

- 10.6. On the rear elevation of the property, the units would all benefit from window and ventilation performances to match that specified in the Acoustic Report.

11. MATERIAL PLANNING CONSIDERATIONS

- 11.1. In the assessment of this application, it is considered that the main issues are: (1) Principle of Development & Need; (2) Changes Since the Pre-Application Scheme; (3) Design & Layout; (4) External & Internal Amenity Space; (5) Neighbouring & Future Resident Amenity; (6) Access & Parking; (7) Ecology; and (8) Other Matters. These are considered below.

Principle Of Development & Need

- 11.2. The application site is brownfield land that is located within the built-up area boundary. This means there is a presumption in favour of new development. The Development Plan and NPPF positively support the reuse of under-utilised land, with NPPF Paragraph 118 stating, *“Planning policies and decisions should: promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing.”*
- 11.3. The site is adjacent to other new housing developments and forms part of the North Littlehampton Masterplan. It is clearly a location where the principle of new residential uses are appropriate should be supported. Given the location and ADC’s housing land supply position, this is a site where the tilted balance of NPPF Paragraph 11(d) applies. The site occupies a sustainable location and development would benefit from the presumption in favour of sustainable development.
- 11.4. As confirmed at the pre-application stage, *“the site is an overgrown area of land which is not currently being used for any purpose and as such is under-utilised land. It is in a sustainable location, given the neighbouring residential sites under construction and the proximity of essential services.”*
- 11.5. At the present time, there is a pressing need for further housing development within the District. Despite the relatively recent ADLP, the LPA does not have a 5 year supply and has under delivered against the Housing Delivery Test. against both measures the housing delivery has led in the past year. There is a clear and pressing need for new sustainable housing.
- 11.6. Given this, and within the planning balance, significant weight should be given to the provision of 2 additional units. Further weight should also be given to modest scale of the dwellings which positively responds to the greatest need in the District. The Strategic Housing Market Assessment (SHMA) confirms that there should be a high provision of 1, 2 and 3 bed homes, which this scheme positively accords with. The smaller scale nature of the units also means they will be more affordable to a wider range of occupants.
- 11.7. The principle of development in this location is therefore acceptable, in accordance with the NPPF, and policies SD SP1, SD SP2 and H SP1 of the ADLP.

Changes Since The Pre-Application Scheme

- 11.8. The pre-application response for the scheme was positive in respect of the sites location and potential to deliver new housing. Officers also welcomed the wider benefit of new housing at a time

of under-supply. The only objection to the proposal was design related, with Officers concerned that the proposal for 4 x 2 bed flats would be over development of the site and squeeze garden provision.

- 11.9. The number and size of units at the pre-application stage would have necessitated a larger building on site, with a notably bigger footprint. This then had the knock-on impact of reducing amenity space, requiring more parking and pushing the southern elevation closer to the train line. As a result Officers confirmed the scheme would appear cramped. They accordingly suggested that the scheme be reduced in scale.
- 11.10. Since then, the applicant has positively taken on board this advice and the scheme is now for only two units. The reduction in the scale of the proposal means the building occupies a more central position on the site and is inset further from boundaries. The reduction in the number of parking spaces has reduced pressure on the front of the site. The properties would now have more amenity space and a better relationship with the train track.
- 11.11. The change to the unit mix has not altered the overall design approach, which remains a scheme formed by a semi-detached building, with pitch roof. This positively responds to the surrounding area and will be discussed in greater detail below.
- 11.12. The applicant submits that the scheme has positively responded to the pre-application advice and sought to improve the development in order to comply with the observations of the LPA. This represents a positive approach to development on the part of the applicant and it is anticipated the LPA will welcome these changes and hopefully support the full application.

Design & Layout

- 11.13. Presently, the site has a poor quality appearance that detracts from the area, given that the wider location is currently being redeveloped for housing. The site does nothing to enhance the setting of nearby housing and has a vacant appearance. The site is in need of investment to positively enhance the land and to replicate the form of development taking place locally. There is a positive opportunity to enhance the site and deliver much needed new housing.
- 11.14. With the preparation for the scheme, reference has been made to the draft Arun Design Guide (ADG). Whilst this is a large and fairly general guide, it is clear that development must respond to the local area, constraints of the surrounding area and opportunities to improve the appearance of a site. Given the appearance of the existing site, it is considered there are ample opportunities to improve the appearance with landscaping and new buildings that will ensure the upkeep of the land.
- 11.15. The dwellings have been designed by the same architectural practice as those that designed the site located immediately to the north. The aim being to ensure this site ties in with the architectural language found acceptable by the Appeal Inspector. The proposal therefore has a similar height, roof form, scale, bulk, mass and appearance to the surrounding areas. The building would be two storeys, with a pitched roof, good proportions and a traditional form. Parking and access would be to the front and private amenity space to the rear. In this regard the site is reflective of the local area.

- 11.16. The proposal positively responds to Paragraph 127 of the NPPF, which seeks to ensure that developments function well, and is visually attractive and sympathetic to local character, whilst delivering an appropriate mix of development.
- 11.17. It further complies with Policy D SP1 which seeks to ensure development makes efficient use of land whilst resetting the characteristics of the site and local area, in matters such as layout, density, scale, mix, character, landscaping, materials, finish and architectural details. At the current time of high housing demand and low delivery rates, this is considered a strong material consideration in support of the proposal.
- 11.18. Finally, the scheme also complies with Policy D DM1, which required the form and design quality, including character and attractiveness, should be harmonious with their surroundings and successfully integrate with the existing surrounding environment. Here, the scheme has been designed cognisant of the local area and reflective of the scale, density and layout of other new development locally.

External And Internal Amenity Space

- 11.19. The building would occupy a central location within the site and include space to all boundaries. It would include new landscaping across the northern side of the site which would visually soften the development and provide screening for the bin and recycling storage.
- 11.20. Both units would have a private garden space commensurate in size to the local area and new housing being delivered to the north. Both properties would have defensible space at their front, being set back from parking areas. All units would have access to covered and secure cycle storage.
- 11.21. To acknowledge the proximity of the train line, the scheme includes 2.5m high acoustic fencing that would run across the southern boundary and return to both the east and west. This would provide a good noise barrier, which would be landscaped internally. This would ensure the amenity space was usable and good quality.
- 11.22. Having regards to ADG Chapter H, it is noted that private rear gardens are advised to have a depth of at least 10.5 metres, however it is further stated that, *“Other innovative design solutions to smaller private rear gardens may also be acceptable in specific circumstances (especially when communal gardens are provided).”* Elsewhere it is stated that, *“smaller gardens with adequate daylight and privacy may also be acceptable in certain circumstances when justified.”* Other guidance notes that front gardens should be a minimum of 2m deep.
- 11.23. In the accompanying sketches for rear garden layouts, Figures 141-143 show this in the context of new housing developments, where dwellings will have back-to-back relationships. The applicant submits this guidance does not directly apply to the application site as there are no overlooking neighbours to the rear. The gardens are also south facing and will have excellent levels of natural daylight which will improve the amenity value.
- 11.24. The western house has a garden space some 7.8m deep, which is slightly marginally below the required standard. The eastern unit is 6m deep, but includes more space at the front. The applicant

acknowledges that the garden space is slightly below that detailed by the guidance, but the benefit of good quality new housing in a sustainable location is deemed to out-weigh any limited harm.

- 11.25. It should also be noted the amenity space to the front of the house is considerably deeper than 2m. As the scheme has sought to deliver units in a position which acknowledges the dwellings to the east, it was felt maintaining a relationship here was more important than shunting properties forwards to make the rear gardens slightly deeper. The generous front amenity space also allows for more planting and softening.
- 11.26. It should be remembered that the SPG is only guidance and must be balanced with other policy imperatives, such as efficient use of land. It must also be applied flexibly having regards to individual site constraints and acknowledging it is general guidance. Here, the units would all have access to good sized garden space which is comparative in size to new housing located to the north and west. Within the planning balance, and given the pressing need for smaller scale new housing in sustainable locations, the level of amenity space proposed is considered entirely acceptable.
- 11.27. Both unit would comply with the National Minimum Space Standards for 3 bed house for 5 people.
- 11.28. Overall, this is considered a well laid out scheme that would offer good outdoor and indoor amenity.

Neighbouring & Future Resident Amenity

- 11.29. As detailed at the pre-application stage, the relationship of the units with the train track to the south requires careful attention. To inform the design, an appropriate Noise and Vibration Assessment is submitted with the application. This section should therefore be read in conjunction with the Noise & Vibration Assessment undertaken by Acoustic Associates.
- 11.30. Their statement confirms that the site will not be negatively affected by vibration and that subject to mitigating design measures, will have an acoustically acceptable environment. The report suggests 2.2m high acoustic fencing being installed across the southern boundary and returns to the east and west. Having checked potential manufacturers details, a 2.5m fence has been selected which will offer good levels of acoustic protection. The applicant is happy for this to be Conditioned.
- 11.31. The rear elevation of the building would require windows with trickle ventilators that should aim to achieve a sound reduction of approximately 27dB. As a result, the windows at the rear will need to include enhanced glazing. The applicant is very happy to agree to this and accept a relevant Condition.
- 11.32. The enhanced glazing would be used along with either intermittent or continuous extractor fans to achieve good ventilation. These will need to be of a higher performance for bedrooms that face the train line, and again, the applicant is happy to accept an appropriate Condition for technical ventilation details.
- 11.33. Subject to the above measures, the report confirms that *“planning permission should not be refused on noise grounds.”*

- 11.34. In terms of neighbouring amenity, the scheme has been orientated and designed to prevent any direct overlooking of neighbouring gardens to the east. The east facing facade of the house would have no openings, with only a high-level rooflight required for ventilation.
- 11.35. The delivery of a development on the site would also improve security for neighbours. As an open and vacant site, there is nothing currently to stop access into neighbouring gardens to the west. The development will secure this boundary and improve the outlook for neighbours.
- 11.36. Given the above, the scheme fully complies with ADG, ADLP and NPPF.

Access & Parking

- 11.37. This section of the report should be read in conjunction with the Transport Report and Construction Management Plans (CMP) provided by GTA Civils. This confirms the scheme is acceptable in highway terms and provides a draft CMP which confirms the build can be undertaken in an appropriately sensitive manner.
- 11.38. The proposed development would utilise the access roadway approved under APP/C3810/W/18/3197149, and this would provide a convenient vehicular access route for the public highway. Parking would be adjacent to the highway, but not on the highway. There would be a short and convenient walk from here to the front elevation of the site.
- 11.39. The scheme includes 5 parking spaces, including 1 visitor space, which would comply with WSCC and Arun Standards. A total of 6 bike parking spaces would be provided in compliance with the ADG. Any requirement of electric car charging points can be Conditioned, but are detailed on the plans.
- 11.40. In conclusion, GTA confirm the proposed development would have *“no unacceptable highway or transport impacts as a result of the proposed development.”* The scheme would accordingly comply with NPPF Paragraph 109 and ADLP Policy T SP1.

Ecology

- 11.41. This section of the report should be read in conjunction with the Preliminary Ecological Assessment undertaken by The Ecology Partnership. This confirms the scheme can be acceptably undertaken in respect of protected species, subject to a number of Conditions and mitigation measures.
- 11.42. A sensitive lighting scheme should be Conditioned if there is to be a change in lighting, with extra care taken to not artificially illuminate the railway line to the south of the site. Enhancements for bats have also been recommended.
- 11.43. Whilst no evidence of badgers was identified within, or around the site where access was possible, it is considered possible that they use the site for commuting and foraging purposes. As such, precautionary methods of work have been outlined to avoid harming any individuals that may use the site.
- 11.44. It was considered possible that reptiles may be using the boundary features on the site due to the protection that they provide from predation, as well as the records of a low slow worm population

previously within the site to the north. As such, sensitive clearance measures of suitable habitat on site have been recommended to ensure the habitats on site are unsuitable for reptiles. This will help ensure that no reptiles are present or harmed on the site when construction begins.

11.45. Subject to the above, the scheme will comply with the NPPF.

Other Matters

11.46. The scheme is submitted with a Preliminary Contamination Report, which the applicant is happy forms a Condition of development.

11.47. Despite the pre-application comments, there are no trees of any note on site and the scheme will result in a notable greening of the site, compared to the majority hard surfaces currently found on site.

11.48. The site falls within Flood Zone 1 and there are no surface water flooding issues.

11.49. The scheme includes appropriate levels of waste and recycling storage, in accordance with the ADG.

12. SUMMARY

12.1. The current proposal represents a notable reduction from the pre-application scheme that was discussed with officers, but still make good use of a sustainable and vacant site. The proposed development has a good layout and design, that is reflective of the local area and take into account surrounding features.

12.2. Supplied with the application are a series of supporting documents that confirm the proposal is acceptable and will deliver two additional dwellings at a time of significant housing under supply. This should be deemed as a significant benefit and assessed against the tilted balance of NPPF Paragraph 11(d).

12.3. The proposal includes appropriate parking, access and storage facilities. Ecological, noise, vibration and contamination can be condition and subject to this, the scheme will comply with the Development Plan, NPPF and the aims of sustainable development.

