

Planning Services
Arun District Council
Civic Centre
Littlehampton
West Sussex
BN17 5LF

25 February 2022

Dear Sir/Madam

Planning Portal Ref. PP-11075355

Gloucester Road Recreation Park, Linden Park, Littlehampton, BN17 7BS

New Fibre Broadband Exchange (Use Class B8 – Storage and Distribution)

On behalf of our client, CityFibre Holdings Limited, please find enclosed a planning application for a new Fibre Broadband Exchange (Use Class B8), with associated access at Linden Park, Littlehampton (Class B8).

The application documentation, which has been submitted to Arun District Council as the Local Planning Authority via The Planning Portal (Ref: PP-11075355), comprises the following:

- Planning Application Form and Certificate B Confirmation;
- CIL Form; and
- Planning Drawings (prepared by Eurotel Design).

The statutory application fee of £462 has been paid via the Planning Portal.

Background

CityFibre is a leading digital infrastructure provider in the UK. It will be instrumental in helping to deliver the Government's target of 15 million users with full fibre broadband by 2025 and comprehensive coverage across the UK by 2033. The improved service will provide faster internet speed, together with better connectivity and reliability. This, in turn, will help boost the country's economy by enhancing business productivity and provide the UK's fastest broadband services to households, schools and hospitals, to name but a few.

Head Office, Portman House, 2 Portman Street, London, W1H 6DU, UK

Cluttons LLP is a limited liability partnership in England and Wales under the number OC344742.
Registered office and head office: Portman House, 2 Portman Street, London W1H 6DU.

To achieve this, the existing network must be expanded and upgraded. This application seeks permission for a new Fibre Broadband Exchange at application site to accommodate high-speed servers. This in turn will enable an improved broadband service to be delivered to this part of Littlehampton and the surrounding area.

Site and Surroundings

The application site is on the southern periphery of Linden Park, a recreational area. The immediate vicinity is a mix of commercial and residential properties. With residential immediately to the south and industrial units to the east. There are residential properties lining the eastern side of Linden Park and industrial backing onto it to the west. To the north of the park is St John Ambulance First Aid Training Centre.

There is no vehicular access to the southern portion of the park at present. There is an existing substation and a playground in the southeast corner of the park.

The site is near Littlehampton Mainline railway station (eight minutes' walk) and is within walking distance of Littlehampton Town Centre and bus routes (10 minutes). It is therefore an accessible and sustainable location.

The site is open grassland, which is tucked away and is not visible from most of the wider area. It does not form part of the main useable area of the park, hence being identified as ancillary land.

Planning History

There have been no planning applications at the site, but it is understood there is an existing substation on site that obtained planning permission for a 2.4m palisade fence in 1991 (ref. LU/433/90).

The site would be considered outdoor recreation (Class F2).

Proposed Development

The proposed development includes the change of use and creation of two datacentre cabins (Use Class B8 – Storage and Distribution) with associated fencing, access, and provision of two generators. The fibre broadband will connect to the existing network along Gloucester Road and the surrounding Littlehampton area.

A new access track will be created off Linden Park and East Ham Road to access the compound. The track itself will be of Bodpave (or similar), which allows grass to grow over it and minimise any visual impact created.

Planning Policy

National Planning Policy Framework (2021)

National planning guidance, which is a material planning consideration, is largely detailed within the National Planning Policy Framework (NPPF). For decision making, the NPPF advises that

local planning authorities should look to approve sustainable development proposals that accord with an up-to-date development plan without delay.

Arun Development Plan

The adopted Local Plan comprises the following:

- Local Plan (2018); and
- Policies Map (2018).

The site falls within economic growth area and existing open space designations. The site is in Flood Zone 1.

The planning policies that are relevant to the consideration of the application are:

- Policy EMP SP1 – Strategic Economic Growth
- Policy EMP SP2 – Economic Growth Areas
- Policy D SP1 – Design
- Policy T SP1 – Transport and Development
- Policy TEL DM1 – Telecommunications
- Policy OSR DM1 – Open Space, Sport and Recreation
- Policy INF SP1 – Infrastructure Provision and Implementation
- Policy QE DM1 – Noise Pollution

Planning Considerations

Principle of Development

This application seeks permission for a Class B8 use (storage and distribution) on the site. This will change the use of the land, which is currently open land for recreation (Class F2). The development is located within the built-up area of Littlehampton, within easy walking distance of public transport access and the town centre. Providing the infrastructure to support growth is an important approach for the Council – the delivery of high-speed broadband and communications technology will enhance the performance of commercial uses in the district (in accordance with Policy EMP SP1).

The open space does not appear to be actively used – it is in an isolated corner of the park, to the rear of commercial and residential properties. The active areas of the park are to the north, in the central areas, so this section of the park does not perform a function for its intended use. Since the COVID19 and the increase in homeworking, improving the broadband coverage for Littlehampton and its surrounding areas has become an essential utility that is supported through Policy TEL DM1 (Telecommunications), and provides significant public benefit to support the location of essential infrastructure on surplus land (Policy INF SP1).

Policy EMP SP2 refers to economic growth areas. The Council will support development that promotes the vitality, viability, and regeneration of Littlehampton. A fibre exchange can support existing and future operations of employment uses, supplying these properties with much needed

broadband. The proposal will not impose on existing uses at Linden Park, but instead offer additional infrastructure in this location for the benefit of the surrounding residential and commercial properties. The site is not in a sensitive location and offers a central location for a larger broadband reach for residential and commercial properties in the district.

Open Space and Recreation

Policy OSR DM1 refers to open space and recreation. The site is in Littlehampton's centre point for built development. The land is not actively used; is isolated from the wider, more active open space; and has been identified by the Council as surplus to requirements, no longer having community value. Both the proposed development is in a semi-enclosed location and is of a generally unobtrusive form and therefore the fibre exchange will have a minimal impact against the overall character of the immediate recreational area and wider residential character.

The policy goes on to explain that development will be permitted on park where development is limited in scale, securing the efficient and effective use of the existing green space. The application site is open land, but not part of useable open space given its location. Its loss would not prejudice the future use or improvement of the wider land to meet the recreational requirements of the local community and the surrounding residential areas.

Telecommunications

Policies TEL DM1 and INF SP1 refer to telecommunications, infrastructure provision and implementation. The Council supports the installation of existing and emerging telecommunications technology in residential and employment areas to improve connectivity of the population, support businesses and encourage homeworking. The proposal provides exactly this and given the recent working trends i.e. homeworking, there is a greater focus placed on the need for improved broadband coverage. The proposed fibre exchange will improve the broadband performance for the needs of the surrounding Littlehampton area requiring high-speed broadband, and the proposal will keep the cabins safe and secure for the users of the new use.

Design and Appearance

The Fibre Exchange has been designed to minimise the visual impact to the surrounding land. The colour of the materials used e.g. the proposed green fencing and use of landscaping at the site's boundaries will reduce any additional visual impact. The development integrates sympathetically into its surroundings in physical and visual terms and there will be no demonstrable harm caused by the proposals to the existing visual amenity of the wider area.

The cabins will be screened by palisade fencing and is sited in a particularly built-up area, so it would not appear alien in the surrounding built environment. The proposal will not interfere with the existing park and no ancillary facilities are lost by this development.

Access

Policy T SP1 refers to transport and development. The creation of a new access off Linden Park and East Ham Road is proposed as Bodpave or similar, which allows grass to grow over it to

minimise any visual impact. The new track is located at the corner of Linden Park and East Ham Road because Linden Road is quite narrow, and it would be difficult to access and egress the site in forward gear. Furthermore, the location of the playground (east) blocks any potential access to main road.

After installation and fit out, the compound will be maintained monthly (by a single van), otherwise there will be no access to and from the site. Park users can still make use of the recreational facilities with the proposed track and low carbon surfacing – priority is still made to pedestrian movements through the park. The external impact of general activity at the compound will be negligible as this section of the park is unused and disregarded. The new access avoids impact on the function of the park and any conflict with the adjacent playground, despite the low traffic movements.

Amenity

The external impact from noise, disturbance, and general activity, will be negligible following initial installation and fit out. Given the site's location, the wider park will generate varying levels of noise in proximity to residential dwellings; so too will the highway network on Linden Park and Gloucester Road. The noise created by the proposed development will be minimal compared to the mentioned activities, and compliant with Policy QE DM1.

There is no lighting proposed on the site that could cause any light pollution issues.

Energy Provision

It is not possible to utilise renewable or carbon neutral technology on site and therefore the existing mains power networks will be used to power the site. Generators will be located on site to ensure continuity of service should the mains power source fail.

Conclusion

The proposed new fibre broadband exchange will provide a significantly improved internet service to Littlehampton and the surrounding area, with enhanced connectivity and reliability. The proposed cabins and associated plant are discrete and have been designed to minimise any visual impact. The operation of the facility will have no material impact on the amenity of the area. On this basis, I respectfully request that the Council supports this application.

I look forward to receiving confirmation that the application has been validated. In the meantime, if you have any queries, please contact Silas Willoughby at

Silas.Willoughby@cluttons.com [REDACTED]

Yours faithfully

Silas Willoughby

Senior Planner

On behalf of Cluttons LLP