



Legal & General Modular Homes

**Land off Victoria Road West,
Littlestone**

Revised Supporting Planning
Statement

Issue | 4 April 2022

Executive Summary

Legal & General Modular Homes is pleased to provide this Revised Supporting Planning Statement to support the planning application for the approval of reserved matters for 80 dwellings on land off Victoria Road West, Littlestone. Following submission of the application in July 2021 we have engaged with the Council and consultees in response to comments on the proposed layout. Following this engagement, the layout and external details of the proposed homes have been amended and the revised plans are presented for consideration by the Council.

The statement considers relevant planning policies and guidance, summarises the key considerations and provides an assessment of the proposed development. It identifies how the proposal conforms with existing planning policy.

Within this statement a summary of relevant national and local planning policies is provided. The National Planning Policy Framework forms material considerations pertinent to the consideration of the planning application.

Detailed consideration has been given to the following key planning matters:

- **Principle of proposed development** – This proposal will deliver much needed housing in the district on a site allocated for housing in the Development Plan and with the benefit of outline planning permission granted in November 2020 (Application Y18/0768/FH);
- **Economic Benefits** – L&G is based business in Sherburn-in-Elmet, North Yorkshire. This development will provide direct employment for local people. This provides local people with the skills appropriate for construction using modern methods. Other substantial public benefits will be delivered over the short and longer term through Council Tax, New Homes Bonus and local expenditure within the Littlestone District;
- **Sustainability Measures** - Sustainability has been a key consideration in the design of the site. All the homes will be built to achieve an Energy Performance Certificate Rating of 'A'. In 2020 only 1.4% of new build homes built in England achieved this level of performance. The homes will also all be powered by electricity in line with the proposed Future Homes standard. The use of electric only power provides future scope for the operational carbon impact of the homes to reduce further in line with the decarbonisation of the national grid.

Homes will be constructed using Modern Methods of Construction (MMC). This allows the homes to be constructed quicker than traditional methods. There are a number of benefits to this, including a reduction in the amount

of construction traffic generated by the scheme and a reduction in disruption to the site's neighbours.

- **Design and Density** – a background to the design evolution is provided in the Design statement which accompanies the application. Consideration has been given to the surrounding context in terms of the scale and layout of the development. The density of development makes an efficient use of land, which is in keeping with the local character and context.

The statement concludes that there is broad compliance with planning policy, significant social and economic benefits which will support the continued vibrancy of Littlestone. In accordance with the presumption in favour of sustainable development, the development should be approved.

1 Introduction

1.1 Purpose of this Statement

This Revised Planning Statement accompanies a planning application made by Legal & General Modular Homes (LGMH) for the approval of reserved matters relating to land off Victoria Road West, Littlestone.

This application seeks approval of matters of scale, layout, appearance and landscaping (the reserved matters) following the granting of outline planning permission in November 2020 -Y18/0768/FH).

The purpose of this statement is to review the development proposals against relevant local and national planning policy.

2 Site Context and Description of Development

2.1 Site Description

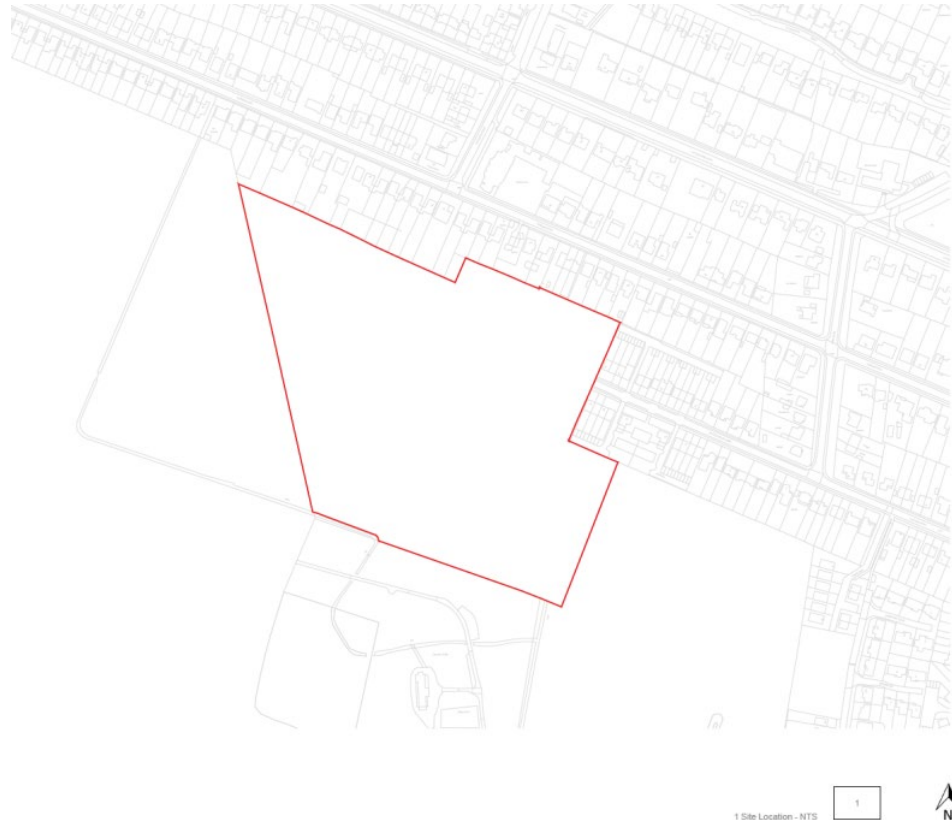
The site is located to the south west of Littlestone, at the northern end of Victoria Road West and to the rear of properties fronting on to Queens Road.

The site is located on the western edge of Littlestone-on-Sea which itself is a predominantly residential suburb located to the south of the town of New Romney.

The application site extends to approximately 4.62 ha (including 1.61 ha of informal green space) and is located to the west on undeveloped farmland to the west of Littlestone Road at the northern end of Victoria Road West, from which point access would be obtained.

To the east the site is backed onto by the properties in Queen's Road and to the west is open farmland and the New Romney Caravan Park comprising some 130 static caravans.

The properties in Victoria Road West area are predominantly two storey houses, there are also two storey houses and chalet bungalows in Queen's Road. Further to the south on the beach frontage there are flats contained within five storey buildings.



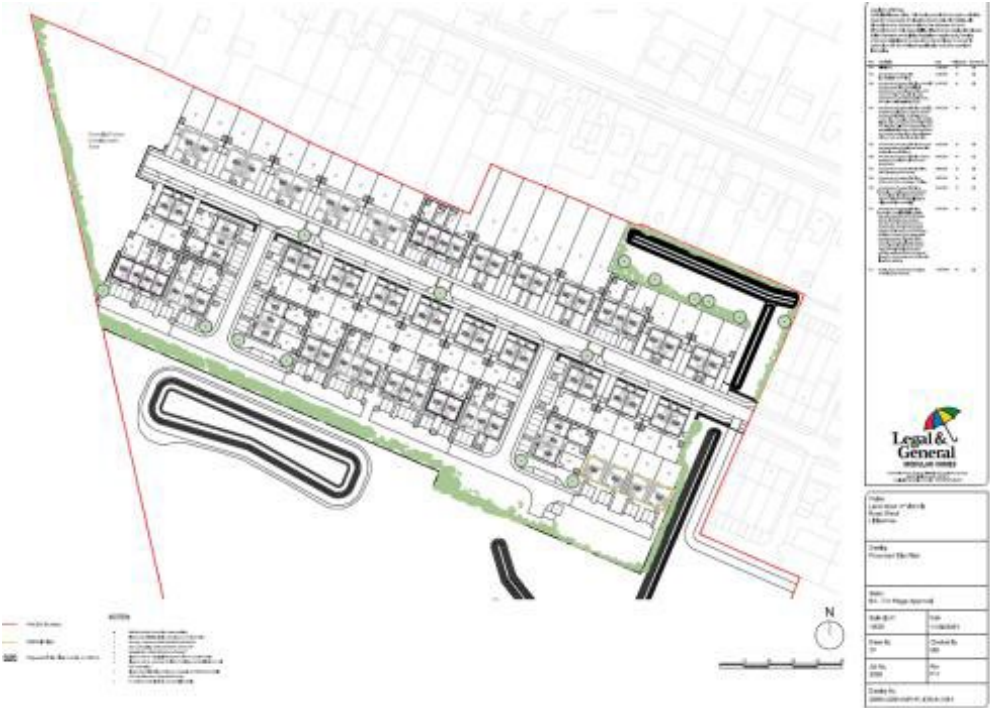
2.2 Relevant Planning History

Outline planning permission was granted for up to 80 dwellings and access with matters of scale, layout, appearance and landscaping reserved for future consideration on the 12 November 2020 – Application reference Y18/0768/FH.

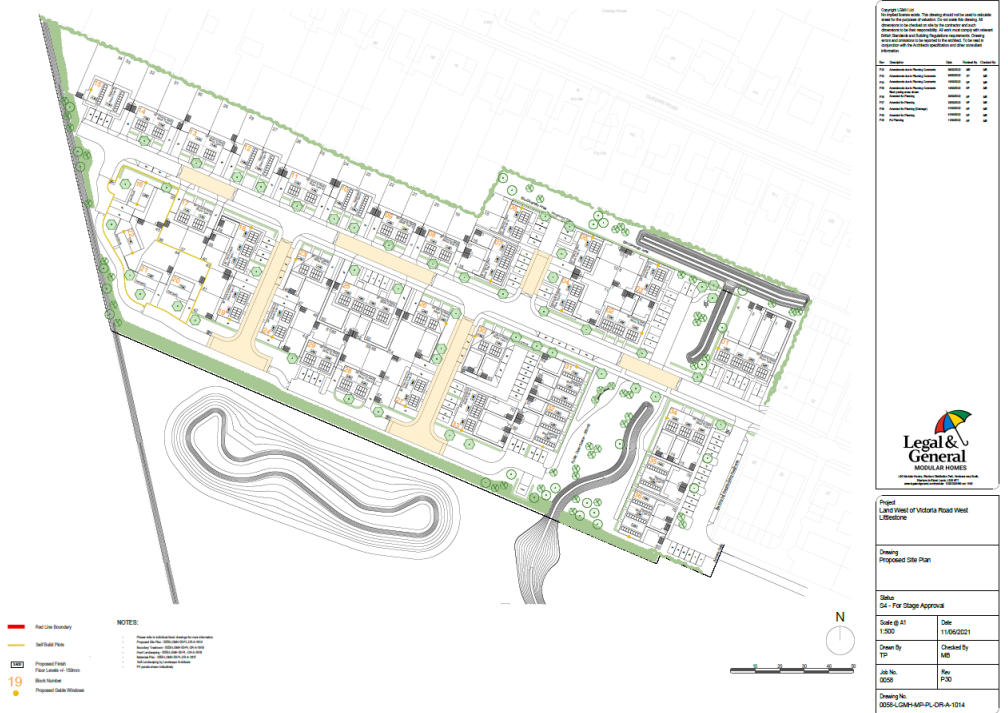
2.3 Description of Development

The application seeks approval of reserved matters for the development of the Site to provide 80 residential units (Use Class C3) and associated parking provision and landscaping.

The Design Statement that accompanies the application explains the design approach to the site and our response to feedback on the application. The layout plan below shows the original submission against the amended layout.



Original submission



Revised layout

3 Compliance with Planning Policy

3.1 Development Plan Status

Section 38 (paragraph 6) of the Planning and Compulsory Purchase Act 2004 directs that:

‘If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise’.

The current statutory development plan for Folkestone & Hythe comprises the Shepway Core Strategy Local Plan (2013) and the Places and Policies Local Plan (2020), along with The St Mary in the Marsh Neighbourhood Plan (2019); and the Kent Minerals and Waste Local Plan (2016).

3.2 National Planning Guidance

The National Planning Policy Framework (NPPF) (2021) and accompanying National Planning Practice Guidance (NPPG) form pertinent material considerations for this planning application. NPPF provides clear guidance that plans and decisions should apply a presumption in favour of sustainable development.

Accordingly, in considering compliance with the Statutory Development Plan, it is relevant to consider the weight which can be afforded to individual policies according to their consistency with the NPPF. This chapter therefore is structured as follows:

- Summary of relevant Development Plan policy and assessment;
- Where conflict is identified, an assessment of consistency of Development Plan policy against the NPPF;
- Assessment of scheme against relevant material considerations as set out within the NPPF.

3.3 The Development Plan

Core Strategy (2013)

The following policies of the adopted Core Strategy are considered to be particularly relevant to the proposed development:

DSD (Delivering Sustainable Development),

SS1 (District Spatial Strategy),

SS3 (place-shaping and sustainable settlements strategy),

SS5 (district infrastructure planning),

CSD1 (Balanced Neighbourhoods for Shepway),

CSD2 (District Residential Needs),

CSD5 (Water and Coastal Environmental

Management in Shepway).

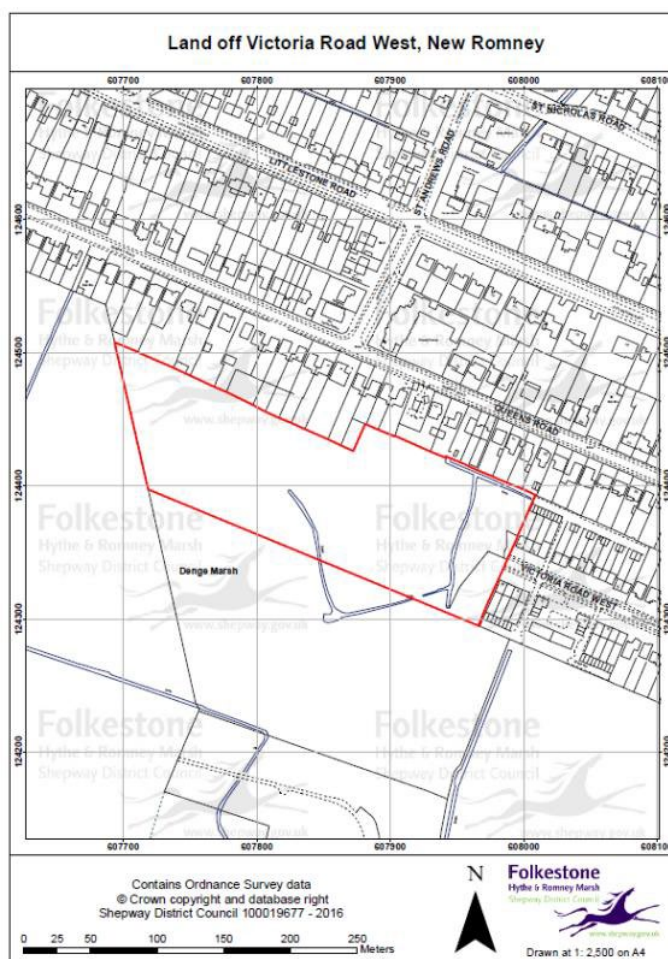
3.4 Places and Policies Local Plan (2020)

The Folkestone & Hythe Places and Policies Local Plan was adopted on the 16 September 2020.

The Places and Policies Local Plan identifies small and medium sized sites for development across the district to meet the targets in the Core Strategy; as well as setting out detailed development management policies to assess planning applications.

Policy RM2 allocates the application site for housing.

Land off Victoria Road West, Littlestone



6.25 This site is located to the south west of Littlestone, at the northern end of Victoria Road West and to the rear of properties fronting onto Queens Road. The site is open countryside and forms part of a larger field used for grazing animals, with few features. The site adjoins the settlement boundary and would be a logical continuation of the existing pattern of development in the area, which predominantly consists of long, wide, linear roads running to the coast. Although it is on the edge of the developed area, the site is in a sustainable location and within walking distance of the facilities and services of New Romney and Littlestone.

6.26 Adjoining the site to the north are the residential gardens of properties fronting onto the south side of Queens Road, with a boundary featuring a mixture of hedgerow and fencing. Development here is predominantly modern but with a mixture of dwelling types and sizes. To the east is Victoria Road West, separated from the site with a

farm gate and fencing; development here is very uniform being predominantly two-storey and neo-Georgian in appearance. Immediately to the south and west is open grazing land with no existing boundaries.

6.27 Folkestone & Hythe District Council is working with representatives from Kent County Council and the NHS Kent and Medway Clinical Commissioning Group (CCG) to investigate the potential for the Marsh Academy site in New Romney to accommodate a new healthcare facility under the 'hub' approach. At the same time the CCG are working on a wider options appraisal to identify and review the prospects of other sites in New Romney, including the expansion of existing sites, within the New Romney urban area to bring forward a new healthcare facility to serve residents of the town and wider hinterland. This work is to also comprise an initial feasibility study to draw up a viable and deliverable scheme. Once this process has been completed the preferred strategy will be announced, by which time the need for policy RM5, and specifically whether it will accommodate a new healthcare facility, will be confirmed. The Marsh Academy site will therefore be safeguarded for future health care and community needs, pending the results of the options appraisal. Funding through Section 106 contributions has been gained from sites identified within Policy CSD8 of the Core Strategy and further funding can be provided through contributions from sites in Policies RM2 and RM4 of this plan. Other funding options may also come forward in due course.

6.28 The site includes land with archaeological potential, and development should ensure that it avoids or significantly mitigates the impact of 'significant' flood risk on part of the site, as highlighted by the Council's Strategic Flood Risk Assessment.

6.29 In order to avoid potential pollution impacts from surface run-off and/or foul drainage, connection to sewerage drainage should be a requirement for any application, and based on confirmation of sufficient capacity at the local sewage treatment works.

6.30 New development must be adequately separated from pumping stations to safeguard the amenity of future residents from vibration of the equipment and this must be considered as part of any masterplanning process.

6.31 Lastly, land within the site has been identified as a Mineral Safeguarding Area for storm beach gravel. If appropriate, for example in relation to the site's coastal flood prevention properties and biodiversity value, the storm beach gravel should be worked prior to development.

6.32 The site is 2.9ha in size and is considered suitable for 70 dwellings with the opportunity for some self-build and custom build plots, depending on the size and layout.

Policy RM2

Land off Victoria Road West, Littlestone

Land off Victoria Road West, Littlestone is allocated for residential development with an estimated capacity of 70 dwellings.

Development proposals will be supported where:

1. Vehicular access to the site is from Victoria Road West, and a suitable layout is provided to enable an emergency access along the southern boundary of the site to the satisfaction of the local highway authority. Adequate parking to serve the new development should be provided;
2. At least 4 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development;
3. Extra flood resistant and resilient construction measures are incorporated into the design of the development to reduce the risk of life to occupants in an extreme flood event and improve flood risk management;
4. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority;
5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;
6. Provision is made for open and play space on site or at an appropriate locality within walking distance, and reinforces the integration and connectivity of green infrastructure in accordance with Core Strategy Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation;
7. Mitigation measures are employed to prevent adverse effects on the nearby Ramsar, Special Area of Conservation and Site of Special Scientific Interest, and where possible provide biodiversity enhancements;
8. Appropriate and proportionate contributions are made to healthcare facilities in New Romney through a site-specific Section 106 agreement; and
9. The masterplanning of the site takes account of the nearby pumping station to allow for odour dispersal and prevent unacceptable impact from vibration.

3.5 National Planning Policy Framework (NPPF)

This section summarises the schemes compliance with the NPPF (2021), which provides the overarching planning policy position for England and is a material consideration in relation to the determination of this planning application.

Achieving Sustainable Development

Paragraph 7 of the NPPF states that *‘The purpose of the planning system is to contribute to the achievement of sustainable development.’*

Paragraph 11 goes on to say that plans and decisions should apply a presumption in favour of sustainable development:

“For plan-making this means that:

- *All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.*

Paragraph 47 points out that Planning law requires that applications for planning permission are determined in accordance with the development plan, unless material considerations indicate otherwise.

3.6.1 Delivering a sufficient supply of homes

Chapter 5 of the NPPF relates to the delivery of housing and reflects the Government's objective of significantly boosting the supply of homes.."

3.6.2 Promoting healthy and safe communities

Chapter 8 of the NPPF sets out that *"planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles."*

3.6.3 Making an effective use of land

Chapter 11 outlines that decisions should promote an effective use of land in meeting the need for homes and other uses. It sets out that decisions should, amongst other things:

- Encourage multiple benefits from both urban and rural land;
- Recognise that some undeveloped land can perform many functions;

3.6.4 Achieving well-designed places

Chapter 12 of the NPPF provides national policies on design. Paragraph 126 states that:

"The creation of high quality buildings and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

Paragraph 130 states that, amongst other things:

"Planning policies and decisions should aim to ensure that developments:

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or*

change (such as increased densities);

- *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

3.6.5 Meeting the challenge of climate change, flooding and coastal change

Chapter 14 of the NPPF includes policies on climate change, flooding and coastal change.

Paragraph 157 states that:

“In determining planning applications local planning authorities should expect new development to:

- *Comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- *take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”*

4 Case for the Proposed Development

This section of the statement focuses on the relationship between the development proposal and planning policy.

The details submitted deliver a sustainable housing development on an allocated housing site using Modular Construction Methods to speed up delivery and reduce build time on site.

4.1 Principle of Residential Development

- The principle of residential development on the site is firmly established. It is allocated for housing in the development plan (Policy RM2) and has the benefit of outline planning permission granted in November 2020 (Y18/0768/FH). The matters for consideration in this application are restricted to scale, layout, appearance and landscaping.

Sufficient information has been submitted to enable the Council to consider these reserved matters.

4.2 Housing Mix

The layout provides for a mix of house types providing 2, 3 and 4 bed two-storey dwellings. A S.106 agreement was entered into with the granting of outline planning permission and requires 22% affordable housing (60% rented and 40% Social Rent), which will be provided on the site. The layout also provides for 4 self-build or custom build plots as required by condition 5 of the outline planning permission.

The housing mix proposed is as follows;

2 Beds – 17

3 Beds – 51

3 Bed M4(3) - 2

4 Beds – 6

4 x 4 Bed Self Build Plots

Total Units - 80

4.3 Density & Design

The accompanying Design Statement provides details on our design strategy for the site. The layout takes account of site constraints and the use of Modern Methods of Construction (MMC).

In order to ensure that the development can work commercially and technically, levels across the site have to be raised. This is due to the fact that the water table is between 750mm BGL to 1200mm BGL and with the water being so close to the surface, this could cause problems for construction and the end users that would not be in the interest of good development. The relationship with neighbouring properties has been carefully considered to ensure there is no adverse impact on living conditions. There will be a significant distance between the proposed and existing properties.

5. Conclusion

This Revised Planning Statement has been prepared to accompany a planning application for the approval of reserved matters dealing with scale, layout, appearance and landscaping only.

Section 38 (paragraph 6) of The Planning and Compulsory Purchase Act states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

The Site is allocated for residential development in the Development Plan and has the benefit of outline planning permission, firmly establishing the principle of development.

The development proposal accords with national and local policy and guidance. The development will bring the following key benefits:

- Delivery of a mix of high-quality housing in a highly sustainable location which would make a significant contribution to the housing needs of the District;
- Incorporation of highly sustainable, efficient and effective methods of construction, including minimal disturbance during the construction period and production of high-quality homes;
- Well-designed layout which considers scale of neighbouring development, protecting areas of high ecological value and nearby heritage assets.
- Wider public benefits to the local economy including creation of local jobs during the construction phase, increased spending in the local area and contributions to Council Tax and New Homes Bonus.

This planning statement demonstrates that the proposal would provide a highly sustainable form of development which is in accordance with up-to-date policies of the adopted development plan. Substantial weight is also given to policies in the NPPF, including development in a sustainable location for much needed housing development.

The layout and design elements have been amended to incorporate comments from Council Officers, consultees and third parties to improve the development.

Accordingly, it is considered that planning permission should be granted for the development proposal.