

Luken Beck

PLANNING STATEMENT (inc. Affordable Housing Statement)

OUTLINE PLANNING APPLICATION FOR THE ERECTION OF UP TO 71 DWELLINGS TOGETHER WITH ACCESS (ALL OTHER MATTERS RESERVED) ON LAND NORTH OF TODDINGTON LANE LITTLEHAMPTON, WEST SUSSEX BN17 7PP.



DECEMBER 2021

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Appendix 1 – Pre-Application Response dated November 2020

Appendix 2 – Appeal decision dated 9 December 2021
Land East of Shripney Road, Shripney West Sussex

On behalf of:

T & L CRAWLEY LLP

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1 Introduction

- 1.1 This Planning Statement accompanies an outline planning application submitted on behalf of T & L Crawley LLP in respect of the erection of up to 71 dwellings on land west of the Lyminster Bypass within the urban boundary of Littlehampton. This statement provides a planning overview of the site and assesses the proposals against the policies of the adopted Development Plan and National Planning Policy Framework (The Framework). There is no disagreement that the Council cannot demonstrate a 5 Year Housing Land Supply (HLS) (Please see **Appendix 1** and more recently **Appendix 2** - Page 6 which confirms a significant shortfall) and consequently the 'tilted balance' brought about by Paragraph 11d of the Framework is engaged.

1.2 Objectives

- 1.2.1 This statement begins by providing a description of the site, its constraints, and an overview of its surrounding context. The statement then evaluates the relevant planning history of the site and its surroundings and then presents the planning policies and associated issues germane to the consideration of the application by Arun District Council and provides an analysis of the impacts and overriding public benefits of the development.

1.3 Application Content

- 1.3.1 In addition to this statement the following documents have been submitted as part of the planning application:
- Design and Access Statement
 - Plans and Drawings, as listed on the covering letter, which describe the scheme and include an illustrative masterplan
 - Ecological Impact Appraisal
 - Outline Landscape Strategy
 - Arboricultural Impact Assessment
 - Flood Risk Assessment including Outline Drainage Strategies
 - Transport Statement and Outline Travel Plan
 - A report by SHW Chartered Surveyors, providing an assessment of the employment needs of the area against the potential loss of employment land

1.4 Scheme Overview

- 1.4.1 The application seeks outline permission for up to 71 dwellings, with details of the means of access also included for consideration. All other detailed matters, layout, scale, appearance and landscaping, are reserved for future approval. In line with the requirements of the Development Management Procedure Order 2015 the application includes a Design and Access Statement which sets out the parameters for those matters.

2. Site Context

2.1 Location & Context

2.1.1 The site was formerly part of a large horticultural nursery which accommodated extensive glasshouses/polytunnels but is now vacant and located within the urban boundary of Littlehampton on the west side of the Lyminster Bypass (A284) which is under construction and due for completion in 2022/23. The site comprises two parcels of land (Site A 0.91ha and Site B 0.81ha) totaling 1.72ha. which are bounded to the south and west by recently completed residential development, to the west by an area of open land beyond which is a household recycling site, whilst to the east is the Lyminster Bypass (A284) beyond which is land forming part of the wider Hampton Park Development allocated for a hotel and Local Centre/Non-Residential Uses. This wider area was granted outline planning permission, including the application site, for the erection of up to 1,260 dwellings (out of a potential 1,460 dwellings), up to 13,000m² of B1 employment space, up to 3,500m² of local facilities, 100 bed hotel, 60 bed care facility, 2 Form Entry Primary School, Community Centre, Youth and Leisure Facilities, extension to existing recycling centre, landscaping and Public Open Space (**LPA Ref: LU/47/11/**). The approved Land Use Parameter Plan showed the application site accommodating up to 13,000m² of employment use arranged over 3 – 4 storeys in height, although no reserved matters application has been submitted and, as explained within the accompanying Employment Viability Report by SHW, there has been no interest in the site for commercial purposes and there is unlikely to be.

2.1.2 The site lies on the edge of Littlehampton within a highly accessible and sustainable location. In a pre-application response dated 9 November 2020 in considering residential development of the site, the Council confirmed;

The site is socially sustainable as it lies on the northern edge of Littlehampton and it is possible for residents to use non-car means of transport to access the primary schools, high schools, shops and other services by the existing bus service nearby and those planned as part of the long-term development of Hampton Park. People will be able to walk and cycle along the new Lyminster Bypass and there are future footway and cycleway links planned as part of the Hampton Park development which will increase the opportunities for residents to walk and cycle to and from local services and facilities. In terms of environmental sustainability, the long term planning of Hampton Park includes the creation of large areas of public open space, including the Central Wetland Area which will provide opportunities to enhance the existing ecology and create biodiversity net gains.....

Extract from ADC Pre-Application response dated 9 November 2020 – **Appendix A**

Figure. 1 – Aerial photograph showing site extent (Courtesy Google Maps 2021)



2.2 Site Description, Characteristics, Constraints

- 2.2.1 The site is largely flat with limited constraints although a number of trees form the northern boundary to the open countryside beyond. The site is not within a Conservation Area, or any other area designated for its environmental quality although, as mentioned above, the site lies within the urban boundary of Littlehampton which is one of the District's main towns where growth is focused and encouraged by Policies SD SP1 and SP1a of the adopted Local Plan. Site B is now occupied temporarily in connection with the construction of the Bypass and is separated from Site A by public highway which currently stops at the western extremity of the site.
- 2.2.2 **Landscape:** The land is not within a nationally or internationally sensitive landscape designation. Parts of the site feature boundaries that are well treed, including recent new landscaping undertaken within the highway verge to provide a 'soft' frontage to the recently constructed four-arm roundabout on the A284 Bypass. . The Council has accepted previously that built development of up to four storeys can be accommodated on the site without causing landscape harm.

- 2.2.3 **Heritage:** There are neither any Listed Buildings or other designated assets adjacent or near the site and consequently, there is no impact upon built heritage assets or their setting.
- 2.2.4 **Flood Risk and Drainage:** The site is predominantly within Flood Zone 1 (lowest risk) although a very small area of the northern section of Site B falls within Flood Zones 2 and 3 although no development is proposed within this area. Consequently, as confirmed within the submitted FRA, the development will not cause flooding issues either on or off site.
- 2.2.5 **Biodiversity:** The accompanying Ecological Impact Appraisal by Lizard Ecology confirms that all biodiversity interests can be safeguarded provided mitigation as outlined is undertaken.
- 2.2.6 **Access & Transport:** The site is accessed via the public highway running between Sites A and B leading to the recently constructed roundabout on the Lymminster Bypass (A284), which runs broadly north/south past the site on its eastern side. The submitted Transport Statement by DTA Transport Consultants, confirms that the site has easy access to public transport, and it is possible to gain access to an extensive network of footpaths and cycleways which connect to numerous services, employment opportunities and Public Open Space. The site is therefore sustainably located.

3. Development Proposals

- 3.1.1 The application seeks outline planning permission for residential development (Use Class C3) comprising of up to 71 new homes (including 30% affordable) with access, associated public open space landscaping, parking and ancillary structures.
- 3.1.2 The application is supported by an Illustrative Masterplan, shown below based on a range and mix of housing types/sizes although this will be fully determined at the Reserved Matters stage. In addition, an Illustrative Landscape Strategy has been prepared by Lizard Landscape Consultants which demonstrates that the site can accommodate both POS and an appropriate landscape framework in which the development will successfully sit, thereby ensuring that the proposals will relate well to their surroundings.
- 3.1.3 Other supporting documents include a Transport Statement, Ecological Impact Appraisal, Flood Risk and Drainage Strategy and an Employment Viability Report.

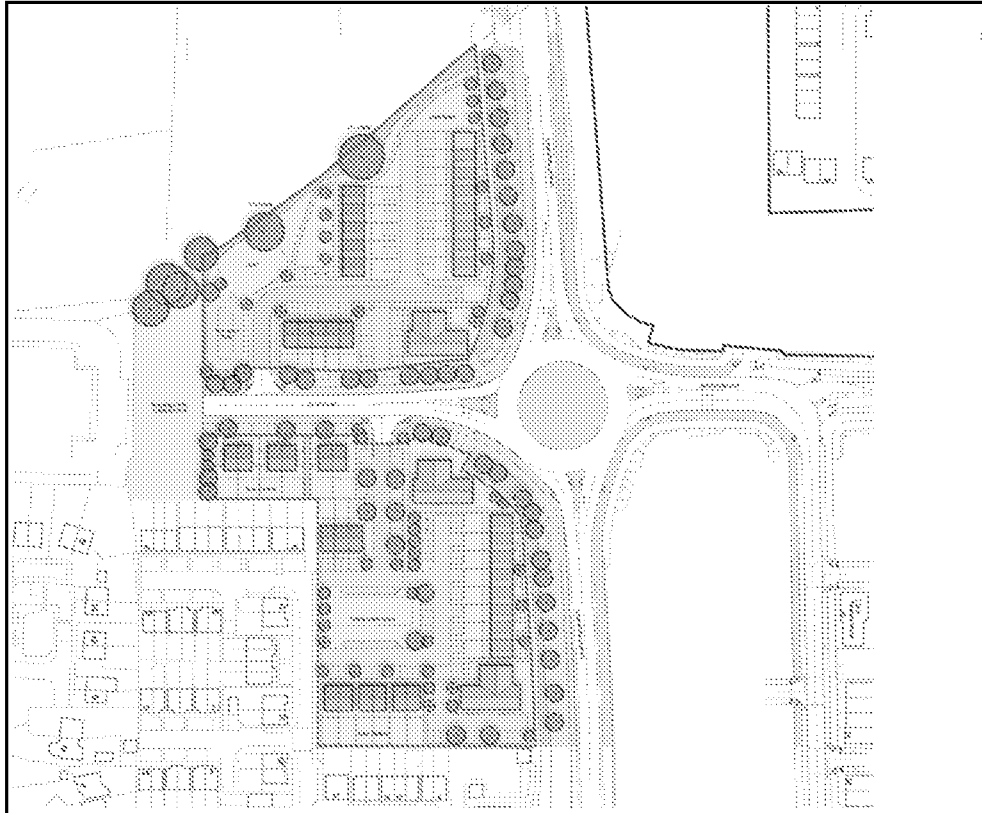


Figure 2. Illustrative Masterplan

3.1.4 Built form would follow a traditional design approach and would include a mix of building heights and styles to reflect the emerging context of the site and to add interest to the wider area and to reflect this being an entrance to Littlehampton from the north.

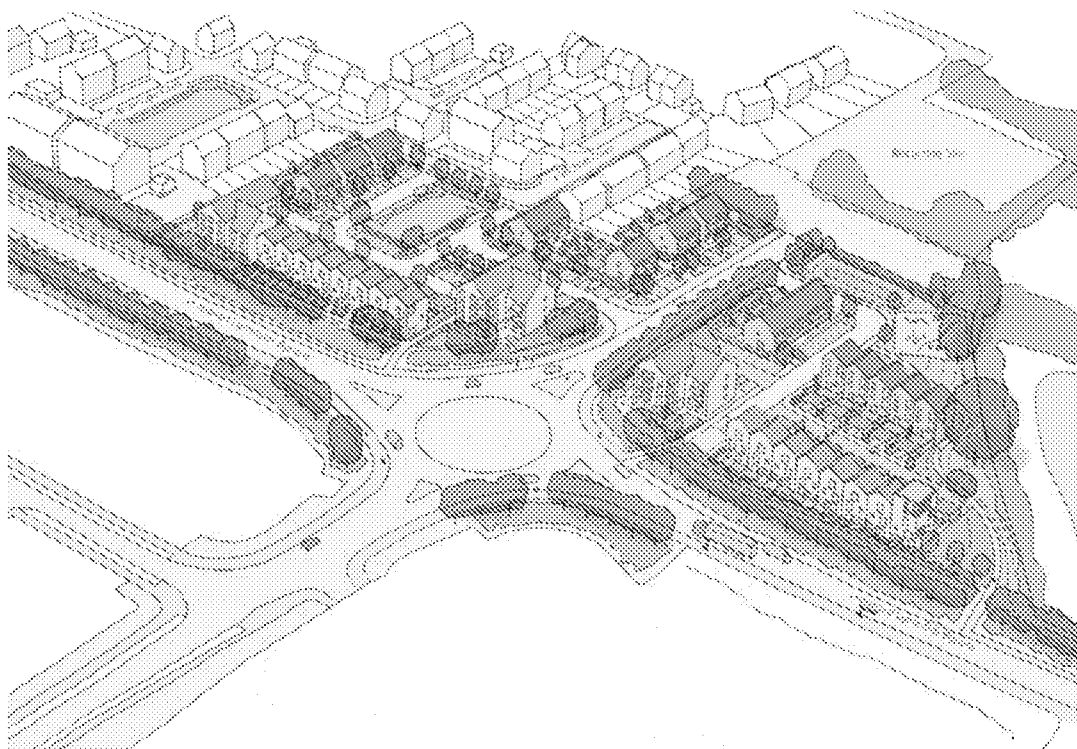


Figure 3. Illustrative Aerial Image taken from Design & Access Statement

3.1.5 Roads and parking are illustrated with a variety of surfacing materials and support best urban design principles including providing a strong sense of enclosure and active frontages. In terms of parking, the illustrative masterplan demonstrates up to this number of dwellings is feasible whilst meeting the Council's adopted parking standards.

3.1.6 The indicative plan also indicates space for informal open space and formal children's play space in accordance with the Council's adopted standards all of which can be determined at the Reserved Matters stage.

Affordable Housing Statement

3.1.7 The proposals will provide a policy compliant level of on-site affordable housing comprising 30% (up to 22 homes) with a mix consistent with Policy AH SP2, being 75% rented and 25% intermediate housing. This will be secured via a Section 106 Agreement to be completed prior to the determination of the application. The quantum and mix of development mix of the scheme will be determined at the Reserved Matters stage but it is fully expected that it will include a mix of 1, 2, 3 & 4 bedroom properties which meet NDSS. The final mix will be informed following feedback from the Councils Housing Officer.

4 Planning History

4.1.1 The site was originally part of a larger garden nursery and accommodated large glasshouses/polytunnels although these have since been demolished. The site forms part of a much wider development known as Hampton Park which comprises an urban extension to Littlehampton, and which is still being developed. The relevant outline planning permission and related consents are summarised below;

Application Ref: LU/47/11 – Approved 23 January 2013

Demolition of existing buildings and structures and erection of up to 1,260 dwellings (out of a potential 1,460 dwelling masterplan), up to 13,000m² of B1 Employment Space, (including 3,000 m² Enterprise Centre, up to 3,500m² of Class A Local Facilities, a 100 bed hotel, 60 bed care home, a new 2 Form Entry Primary School, Community Centre, Youth & Leisure Facilities, Combined Heat & Power Plant, Extension to existing Household Recycling Centre, landscaping, replacement and additional allotments, multi-functional green infrastructure including sports pitches (& associated changing facilities), informal open space, children's play areas, primary vehicular access from a new access from the A2259 bridging over the railway line with additional access from Mill Lane & Toddington Lane.

Application Ref: LU/346/14/PL – Approved

Application for variation of Conditions 11, 17, 18, 20 and 30 imposed under LU/47/11 relating to maintenance of watercourse, scheme for creation of central wetland area, scheme for details of bridges and buffer-zones to on-site watercourses, ecological management plan and scheme for hydrants.

Application Ref: LU/182/15/PL – Approved

Variation of conditions 4, 6, 7, 8, 39 & 42 imposed under planning reference LU/47/11/ relating to list of plans, illustrative masterplan, CHP plant building, Design Statement, bus stops & traffic improvements.

The above provides the previous planning background establishing the principle of development of the site. The principal point of issue is therefore the proposed change from employment use to residential use having regard to the Council's acute housing shortage and the desire to avoid the further release of greenfield sites which is a poorer option than making better use of urban sites in sustainable locations such as this. It is also relevant to note that the site is not within an Employment Growth Area protected by Policy EMP SP1 which protects more appropriate employment sites from alternative development and also employment related development, including a hotel, are still retained within the overall development at North Littlehampton.

5 Planning Policy

Development Plan

- 5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.1.2 The development plan for Arun District Council comprises:
- West Sussex Waste Local Plan 2014
 - Joint Minerals Local Plan 2018
 - Arun Local Plan 2011-2031
 - Littlehampton Neighbourhood Plan 2014

The relevant Development Plan policies are referenced below and are considered under the following section – *Planning Considerations*.

Arun Local Plan 2011-2031 (ALP)

5.1.3 This plan was adopted in July 2018 and sets out the spatial strategy for the District for the next 20 years. It will be due for review by 2023 in line with requirements in the National Planning Policy Framework. A full range of policies will be applicable to the subsequent Reserved Matters submission, but this application is concerned with matters of principle regarding the proposed land use, access and whether the amount and characteristics of development are likely to be acceptable. Therefore, particularly relevant policies include;

- **SD SP1 Sustainable Development** - confirms the presumption in favour of sustainable development
- **SD SP1a Strategic Approach** - advises that, inter alia, the Council will seek to meet its full housing needs
- **SD SP2 Built-up Area Boundary** - confirms that development will be directed to within the BUAB and approved subject to consideration against other policies within the Plan.
- **LAN DM1 Protection of Landscape Character** - advises development should have due regard to the particular characteristics and natural features of the Landscape Character Areas
- **AH SP2 Affordable Housing** - requires 30% of dwellings to be affordable in accordance with a mix to be agreed with the Council
- **H DM1 Housing Mix** - suggests an appropriate housing mix to be adopted on sites
- **H SP1 The Housing Requirement** - sets out the District's housing requirements which sadly is not being met.
- **EMP SP1 Strategic Economic Growth** - confirms that the plan allocates 75ha of employment land to provide "sufficient flexibility" to meet the District's needs. In addition, through Policy EMP SP2, the Plan allocates 2 Economic Growth Areas (EGA) where employment growth is especially encouraged. The application site is not within an identified EGA
- **EMP SP3 Strategic Employment Land Allocations** - In respect of North Littlehampton, Paragraph 8.6.12 states:

8.6.12 In Littlehampton, planning permission has been secured for the development of housing, employment and other land at Courtwick and North Littlehampton. The planning permissions were granted for these sites in 2011 - 2012 and therefore form part of the strategic allocations for employment land within the Local Plan as Strategic Sites 5 and 6.

The Policy itself refers to 2 ha of employment land at North Littlehampton where it is advised that employment development will be supported. Paragraph 8.7.5 recognises that they may be instances where employment sites are redeveloped for alternative uses such as housing and states;

8.7.5 *Identified housing need may be present in many communities but the change of use from employment may be inappropriate compared to alternatives, including a need to retain or promote economic vitality within communities. Before any change of use from employment will be considered, through the Local Plan, the Council will require that it is demonstrated that a site is no longer required and is unlikely to be re-used or redeveloped for industrial/commercial purposes. This should include a clear demonstration of marketing, viability appraisal and the suitability of the site to accommodate a new use - using a methodology to be agreed by the Council at pre-application advice stage....*

Policy EMP DM1 Employment Land Development Management - this Policy seeks to protect existing employment sites and premises “where there remains a reasonable prospect of employment use...” The same Policy also seeks to direct “office development to the Town Centres”.

- **D SP1 Design & D DM1 Aspects of form and design quality** - requires proposals to demonstrate good design
- **ENV DM4 Protection of Trees** - seeks the protection of existing landscape features
- **ENV DM5 Development and Biodiversity** - seeks biodiversity enhancements on developments
- **GI SP1 Green Infrastructure and Development** - requires consideration to be given to the Green Infrastructure Network
- **OSR DM1 Open Space, Sport and Recreation** - requires development to contribute towards open space provision having regard to Secured by Design
- **T SP1 Transport and Development** - seeks to ensure that development does not cause highway conflict and safe access is achieved and promotes sustainable travel
- **T DM1 Sustainable Travel and Public Rights of Way** - seeks to ensure ease of movement and promote sustainable modes of travel
- **W DM2 Flood Risk** - seeks to direct development to sites that are not vulnerable to flooding
- **W DM3 Sustainable Urban Drainage Systems** - encourages the use of SUDs where possible and practical

5.1.4 It is highly important and relevant to acknowledge that the current Local Plan’s policies for the distribution and provision of residential development cannot be considered ‘up to date’ as the Council cannot demonstrate an adequate supply of housing land, even despite the plan’s relatively recent adoption. In determining an appeal in December 2021, the Council agreed that it could only demonstrate approximately 3.3 years HLS which is a substantial shortfall (Please see **Appendix 2**). In line with paragraph 11 of the Framework, the Council must place significant weight on significantly boosting housing supply and requires the Council to apply the ‘tilted balance’ by way of a presumption in favour of sustainable development until it can demonstrate a robust housing land supply position.

- 5.1.5 In the case of the application site, as acknowledged by the pre-application response dated 9 November 2020, the Council has accepted that residential development of the site would comprise 'socially' sustainable development, that the site lies within a highly accessible location and that development of up to 4 storeys in height is appropriate.

Littlehampton Neighbourhood Plan 2014 - 2029 (LNP)

- 5.1.6 As the ADC Local Plan is relatively recently adopted, it is more up to date than the Littlehampton Neighbourhood Development Plan which predates the Local Plan by almost 4 years and therefore fails to meet the tests in Paragraph 14 of the Framework which states;

14 In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;

- 5.1.7 Notwithstanding the age of the LNP, **Policy 1** of the LNP follows closely advice within the Framework and confirms that planning applications that accord with the LNP will be approved unless material considerations indicate otherwise, and that planning permission will be granted where relevant policies in the LNP are silent or out of date. **Policy 2** further states that the LNP concentrates future housing, economic and community-related development within the built up area boundary of Littlehampton. Policy 3 refers to Housing Supply advising that "sites that are 400m walking distance, as shown on the proposals map, from a designated local centre will be particularly suited to meeting the needs of smaller households of elderly people or young people...." The application site sits very close to the designated Local Centre and consequently is particularly suited to meeting local housing needs.

Other Material Considerations

- 5.1.7 The National Planning Policy Framework 2021 and Planning Practice Guidance remain the overarching current national planning guidance and best practice resource to be followed by LPAs. The "golden thread" running through the NPPF is the presumption in favour of sustainable development. Paragraphs 11 and 12 confirm that the starting point for decision making is the development plan unless material considerations apply and that development which accords with an up-to-date local plan should be approved. However, Paragraph 11d sets out the position where the Local Plan is out-of-date which applies in the current instance owing to the acknowledged housing shortfall.

- 5.1.8 Section 5 (Delivering a sufficient supply of homes) of the NPPF seeks to significantly boost the supply of housing by delivering a wide choice of high-quality homes in order to meet local community needs with the right size, type and tenure of housing needed. Paragraph 60 therefore states;

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

- 5.1.9 Paragraph 59 also makes clear the importance that land with permission can be developed without unnecessary delay.

- 5.1.10 Section 12 ("Achieving well-designed places") attaches importance to the design of the built environment and advises that good design is a key aspect of sustainable development. Paragraph 127 sets out a range of criteria which decisions should seek to achieve in approving developments, while under paragraph 130 it is confirmed that poor design that fails to take up opportunities available for improving the character and quality of an area and the way it functions should be refused (taking into account local design standards and supplementary planning documents). Albeit paragraph 126 also makes clear to avoid unnecessary levels of detail and prescription and allow suitable degrees of variation.

- 5.1.11 Under Section 14 ("Meeting the challenge of climate change, flooding and coastal change") the Framework is clear that "local planning authorities should ensure that flood risk is not increased elsewhere" by new development and that "the aim... is to steer new development to areas with the lowest risk of flooding". In line with its aspiration to deal with flood risk and drainage proactively this application is supported by a Flood Risk Assessment and Drainage Strategy. This strategy provides confidence that the Illustrative Masterplan is a robust example of the capacity of the site and designed holistically with drainage infrastructure in mind.

- 5.1.12 Section 15 (Conserving and enhancing the natural environment) stresses the importance of minimising impacts and providing net gains for biodiversity, including by establishing new ecological networks, and that development should not cause significant harm to biodiversity or recognised habitats/sites that cannot be mitigated or compensated for.

- 5.1.13 Having regard to the provisions of the Framework this site represents an excellent opportunity to boost housing supply within a highly sustainable and accessible location and which, as this report demonstrates, will have negligible effect upon social, economic or environmental objectives and

only a modest effect on landscape character and visual amenity.

5.1.14 A number of adopted Supplementary Planning Documents (SPDs) and other relevant planning guidance, serve as additional material considerations. These include;

- Arun Parking Standards 2020
- Arun Design Guide 2021
- Arun District Public Open Space, Playing Pitches and Built Facilities 2020

The illustrative proposals have been designed having close regard to the above SPD's and the accompanying Design and Access Statement explains how these principles can be accommodated within the site which will accommodate up to 71 dwellings.

6 Planning Considerations

Principle of Development, Paragraph 11 of the Framework and the 'Tilted Balance'

6.1.1. The application does not seek detailed approval, save regarding access. The purpose of this outline planning application is to put forward the case for the principle of residential development, as an alternative to employment development and to demonstrate an appropriate amount of development which can successfully be accommodated. This is supported by the conclusions of a full suite of detailed technical appraisals.

6.1.2 In accordance with paragraph 11 of the Framework, the site must be positively considered, in accordance with the objective of promoting sustainable development to help resolve the present and acute housing supply deficit. This point is accepted by the Council which must undertake a reasoned planning balance given the clear presumption in favour of approval of sustainable development such as that proposed.

6.1.3 As Paragraph 11 of the Framework confirms (Our emphasis in bold), where relevant policies "*which are most important for determining the application are out-of-date*"⁸ planning permission **should be granted unless:**

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷; or
- ii) any adverse impacts of doing so would **significantly and demonstrably outweigh the benefits**, when assessed against the policies in this Framework taken as a whole.

- 6.1.4 **Footnote 8** to that paragraph clarifies this will include where an LPA cannot demonstrate a five-year supply of deliverable housing sites. In addition, the site is not within an area that is “protected” for environmental reasons or sensitive in terms of heritage assets referred to within **Footnote 7**. Having regards to the findings below, we believe the proposals represent a sustainable option for housing development with significant and tangible public benefits arising including contributing to reducing the shortfall in the availability of affordable housing.
- 6.1.5 On the 9 December 2021 an Inspector’s decision on ‘Land east of Shripney Road, Shripney (Appendix 2) allowed outline planning permission for up to 46 homes, and confirmed the supply of housing position (with 20% buffer applied) is **only circa 3.3 years**. Consequently, in this case, the ‘Tilted Balance’ is similarly engaged and the Council must balance any benefits against any potential conflict with the Development Plan which in this case, is the possible loss of a potential (not existing) employment site which we believe, for the reasons outlined by SHW, is far outweighed by the tangible and significant benefits of the scheme which are discussed below.

SOCIAL OBJECTIVES

Benefit 1

The proposals will deliver up to 71 dwellings, of which up to 50 will be market housing for which there is a significant and demonstrable need within the local area. The delivery of an appropriate mix of market homes will ensure that the needs of a wide range of residents are met to which significant and compelling weight should be given as supported by Paragraph 60 of the NPPF with respect to significantly boosting housing supply. This is reinforced by the Councils accepted lack of a 5-year HLS which adds further to the weight to be given to the provision of new homes which will contribute to the aims and objectives of the NPPF as reinforced by the Government in its numerous statements on the current housing crisis. As a consequence, this benefit should be given **significant weight**.

Benefit 2

In addition to market homes, the Council acknowledges there is also a significant unmet need for affordable housing. The appeal proposals will provide up to 21 (30%) affordable homes in accordance with the Council’s aspirations for the site. These affordable homes, of a mixed size and tenure, will greatly assist with accommodating local residents in most need of housing from within the District. This is something which also deserves to be given substantial weight in the decision-making process as evidenced by many other appeals in which the absence of a 5 Year Housing land supply along with proposals for market and affordable housing are proposed were considered to outweigh other planning matters. Therefore, this benefit should be given **very significant weight**.

Benefit 3

The provision of additional accessible Public Open Space will promote active and important social interaction and encourage healthy lifestyles which is endorsed by Paragraphs 92 and 98 of the Framework. This is another compelling social benefit of the proposals, which should also be afforded **significant weight**.

ENVIRONMENTAL OBJECTIVES

Benefit 4

The release of the site for housing will reduce pressure on more sensitive, less sustainable greenfield sites which the Council is having to consider favourably in order to meet its housing requirement. To allow this application will reduce the need to release such sites and consequently will result in environmental benefits by protecting less favourable sites from being developed which should be afforded **significant weight**.

Benefit 5

The proposals will result in the introduction of a positive and successful development which respects the context of the site including this important entrance to Littlehampton and without prejudice to our firm view that appropriate employment development is not viable on the site, it is contended that a well-designed residential, energy efficient development will make a much better contribution in design terms than large scale employment buildings with large areas of car parking and parking and turning for commercial vehicles along with associated commercial activity/structures which would not make a successful visual transition from the open countryside. Therefore, we consider this benefit can be given **moderate weight**.

Benefit 6

The Proposals will result in a net biodiversity gain which is a further environmental benefit of the proposals to which moderate weight should be given. The existing site is generally devoid of biodiversity with the exception of the northern boundary and consequently, the opportunity exists to greatly enhance the landscape and ecological value of the site through a variety of measures including retention and management of existing landscape features, significant new, species rich planting and enhancement of biodiversity features such as bird and bat boxes. This benefit should be given **significant weight**.

ECONOMIC OBJECTIVES

Benefit 7

The development will contribute significantly to the economic prosperity of the area as a direct result of the development. This will arise as a result of local employment opportunities during the construction period (of circa 18 - 20 months), the creation of wages which will be likely to be spent locally and the investment in local businesses in respect of trades/servicing the construction and supply of materials etc. The proposals will also be CIL liable which will result in contributions towards social, environmental and economic benefits within Arun. Following completion of the development, the residents will contribute significantly to the local economy through spending on local businesses, local facilities and supporting public transport and similar. As a result, it is considered that a significant economic contribution will arise as a result of the development to which **moderate weight** should be given.

The substantial benefits of the proposals as outlined above, are considered to far outweigh the loss of this modest employment site which is most unlikely to be developed for such purposes for the reasons detailed in the accompanying Employment Viability Report by SHW. As such, the potential impacts of the development are limited and are insufficient to outweigh the many public benefits. In relation to the employment potential of the site, it is notable and, in the absence for evidence to the contrary, very relevant to consider the following extracts from the attached report;

Other than in Brighton, large strategic office relocations into the regional marketplace have not occurred during last 20 years. We consider that this trend is unlikely to change and that, to the extent any such inward relocations do occur, they will be confined only to Brighton.

With respect to Businesses uses generally, these follow the same trend and, with the exception of large-scale storage and distribution uses associated with 'last mile' delivery services which demand much larger sites than at Toddington Lane, the market remains very flat which in our view is unlikely to change in the foreseeable future.

Whilst the current availability of office space appears limited, the trend position suggests that it is adequate in the context of both current and likely future demand side conditions. We believe this to be the position on both a quantitative and qualitative basis. In the event of an uptake in occupier demand we anticipate that this would be readily met by the current stock of available space.

Looking forward, we do not expect to see the demand side characteristics of the Littlehampton office market being subject to significant, if any, positive change. Given the historic local trend position and the increasing polarisation of large-scale office occupiers towards major centres such as Brighton, our expectation is that office demand within Littlehampton will, at very best, remain of a parochial nature and that it will be satisfied by existing supply.

To encourage an investor to fund a developer to construct an office building speculatively, the probability of an early letting or sale of the completed scheme is an essential prerequisite. Such a prerequisite would not be available within the Littlehampton market arena.

Owner occupiers are not necessarily driven or constrained by the same judgement as a speculative developer and can, for operational reasons, choose to accept that the aggregated land, construction and finance costs of a construction project will exceed its end value. Achieving profit from the development is not necessarily the primary objective. However, in the case of Littlehampton, the degree of disparity as between end value and construction cost is so great that even the most impassioned occupier be unable to justify locating to the area. The downside risks associated with securing a suitable workforce, never mind selling or letting the building if ever it became surplus to needs, would be too great.

In our view there is no reasonable prospect that the site will attract an office occupier or a B2/B8 developer, and certainly not at a level that a tenant would be required pay to justify building new office space.

- 6.1.6 The above reinforces the conclusion that any conflict with the Development Plan is far outweighed by the benefits of the proposals which will also reduce the need to develop greenfield sites in more sensitive locations. The Council is currently faced with a number of proposals which lie outside the defined urban/village boundaries, generally on greenfield sites whereas the proposals relate to Previously

Developed Land to which the principle of development is accepted. Furthermore, the pre-application response, which was given prior to the appeal decision at Appendix 2, confirmed that the proposals are sustainable development as follows

Consequently, it is considered that it is sustainable development by taking into account the social, environmental and economic strands and the location of the development at Hampton Park, it is concluded that paragraph 11d is engaged.....

Extract from Pre-Application response dated November 2020

It is therefore a question of planning balance between the unquestionable significant benefits of the proposals weighed against the loss of a site allocated for employment purposes albeit that it is strongly contended this would not be viable or likely. Furthermore, other non-residential development is still proposed including a 100-bed hotel to the east of the application site along with a Local Centre and related commercial premises (Sites C & D). This is reinforced by the design benefits of a residential scheme in contrast to a commercial development and its associated significant parking/servicing requirements at the entrance to the town. The benefits and weight to be applied are summarised further in the table below;

Public Benefit/Impact	Harmful/Beneficial/Neutral	Weight to be given
Provision of market housing	Beneficial	Significant
Provision of 30% affordable housing	Beneficial	Very Significant
Protects Greenfield Sites/less sustainable sites from Development	Beneficial	Significant
Sustainable location and improved accessibility through site/PDL	Beneficial	Significant
Provision of Public Open Space	Beneficial	Significant
Well-designed	Beneficial	Moderate

development		
Energy Efficiency	Beneficial	Moderate
Biodiversity Enhancements	Beneficial	Significant
Economic Benefits (employment and wages/local expenditure/CIL)	Beneficial	Moderate
Impact upon Landscape	Neutral	Limited
Loss of Potential Employment Site	Negative	Moderate

6.1.7 The site has a total area of 1.72ha and the application proposes up to 71 dwellings, at a maximum gross site density of 41 dwellings per hectare which equates to an efficient and effective use of land within a sustainable location consistent with Paragraph 105 of the Framework. This also consistent with Local Plan policy D SP1. The proposed amount and density treads appropriately between reflecting existing and emerging character and using the land efficiently. The scheme, despite its indicative status, has been informed by a thorough analysis of the site and its context, with the application of plan policy requirements and the findings of supporting appraisals.

6.1.8 As can be seen from the Illustrative Masterplan the density enables the provision of accessible landscaped green infrastructure and buffers around the perimeter of the site. This has several beneficial effects, including reinforcing and enhancing wildlife corridors,

6.1.9 Achieving this quantum of development, the Illustrative Masterplan accomodates a mix of housing types and sizes together, including a number of apartments, which reflects the requirement for a *“balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations”* in Policy H DM1. Having regard to the SHMA, this found the greatest need would be for smaller 1 and 2 bedroom affordable homes, and for 2 and 3 bedroom market dwellings. The mix of affordable housing will also meet with the indicative mix set out by policy AH SP2. Nationally Described Space Standards (NDSS) can also be secured at the Reserved Matters stage.

- 6.1.10 The development will reflect key aspects of the existing character of built-form across a range of dwelling typologies such that the proposals create a varied and vibrant character of housing that complements the surrounding development and makes a fitting contribution to this part of Littlehampton.

7 Conclusions

- 7.1.1 In conclusion, the scheme has had careful regard to the nature and pattern of surrounding development and its relationship to the adjacent countryside. The site is not particularly sensitive or influential in landscape terms and development is unlikely to have significant adverse impacts on the character and appearance on the wider character of the countryside. The provision of an attractive, well-designed residential development will make a successful and positive contribution whilst making a significant and tangible contribution to the 3 objectives of sustainable development.
- 7.1.2 The Council acknowledges that it cannot demonstrate a 5 Year Housing land Supply and consequently the most relevant policies of the Local Plan are out-of-date, and the tilted balance brought about by Paragraph 11 of the Framework is engaged. The presumption in favour of sustainable development carries significant weight and provides a material planning consideration sufficient to outweigh any possible conflict with the Development Plan. The benefits of the provision of badly needed homes (including affordable properties) combined with the stated objective of significantly boosting housing supply provide clear and convincing justification to grant planning permission in this instance.
- 7.1.3. The potential use of the site for new-build employment premises is highly unlikely given the conclusions of the attached report by SHW and the costs of new build employment buildings versus the likely return which will not provide sufficient incentive for a developer to bring the site forward. In addition, it is also relevant to note that the consented development also includes. 100-bedroom hotel and Local Centre which will include non-residential uses which will generate employment within North Littlehampton.
- 7.1.4. Finally, it is also highly important to note that the Council is in the position of having to approve less sustainable or accessible, greenfield sites in order to assist in meeting its 5 Year Housing deficit or face losing planning appeals as a result. (As evidenced by the attached appeal decision and other recent Council decisions). In approving this application, pressure on such sites will be reduced and the need to release greenfield sites in less accessible locations considerably lessened

