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Arun District Council

5 May 2022

Dear Sir/Madam,

**Land to the North of `Toddington Lane, Littlehampton BN17 7PP
Planning Application LU/417/21/OUT - Outline Planning Application for the erection of up
to 71 dwellings will all matters reserved except access**

Further to my discussions with Michael Eastham, who I understand has now left the Council, please find attached the following in response to the various consultation replies received in respect to the above outline planning application.

- A Transport Note providing a detailed response to WSCC Highways comments which we believe resolves all outstanding highways concerns;
- Revised Illustrative Masterplan with enhanced cycleway connections and revisions to overcome highways comments received from WSCC;
- Revised Design & Access Statement to reflect the revised illustrative masterplan
- A Density Analysis which reviews the proposed density (assuming 71 dwellings) and provides a comparison with the adjoining Hampton Park development and adopted Design Guide to demonstrate that the proposals do not comprise overdevelopment of this sustainable brownfield site
- A revised Illustrative Landscape Strategy to reflect the above amendments
- A response from Chartered Surveyors, Stiles Harold Williams Partnership LLP (SHW) to the comments received from your Economic Development Team which confirm that the site is not viable for new-build employment within Class E and further reinforces our view that an industrial development at this important entrance to Littlehampton would not provide an appropriate form of development having regard to the likely style of buildings and the accommodation of car parking and commercial vehicle parking/turning/delivery/servicing at this prominent site. The employment allocation of 2.0ha would already be met by the remaining sites at Hampton Park including for the provision of a 100-bed hotel, 60 Bed Care Home and Local Centre

It is considered that the above fully resolves any outstanding matters and, with regards to potential loss of employment, the submitted response advises there is no likelihood of the site being brought forward for Class E employment purposes. Furthermore, any alternative such as B2 or B8 development would not be suitable for this important site at an entrance to Littlehampton in close proximity to existing residential development.

Our view on the above is further reinforced by the lack of a 5- Year Housing land Supply and the application of the 'tilted balance' which applies a presumption in favour of sustainable development. It is noteworthy that due to its housing position, the Council has adopted an Interim Housing Statement which supports appropriate edge of settlement greenfield sites. Clearly, in this case, as Previously Developed Land (PDL), the site is sequentially and spatially preferable and supported by Paragraphs 119 and 120(d) of the NPPF which encourage the prioritisation of brownfield sites such as this. Whilst it is inevitable the Council will need to release Greenfield sites to meet its housing need, it should also look positively at the current proposals given the significant and tangible public benefits when weighed against the limited harm arising from the loss of a potential employment site and the fact that it will reduce pressure on less sustainable greenfield sites within the District.

With regard to your Landscape Officers comments, it is important to stress that the application is in outline only with all matters except access reserved for later approval. It is also of relevance to note that the Council has previously granted outline planning permission on the application site for up to 13,000m² of B1 employment use (now within Class E) within buildings of up to four storeys in height which, together with required car parking and HGV/Commercial vehicle parking and turning, would result in a very different and inappropriate impact upon this important gateway site into Littlehampton. Other comments raised relate principally to the subsequent Reserved Matters application such as the layout, scale and landscaping of the proposed dwellings.

In the light of the attached, I would welcome further dialogue with yourselves to establish whether you may be willing to support our application for residential development to which significant weight should be given in the overall planning balance.

Yours faithfully

David Jobbins

David Jobbins MRTPI

Director

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