

REPORT



LAND NORTH OF TODDINGTON LANE

ANALYSIS OF CHANGE OF USE PROPOSALS

IDENTIFICATION TABLE

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1. INTRODUCTION

1.1 Overview

- 1.1.1 SYSTRA Ltd (SYSTRA) has been commissioned by Arun District Council (ADC) to advise on a Market Strategy Report, submitted by SHW on behalf of T&L Crawley No. 2 LLP (the Applicant), in support of an outline planning application (reference: LU/417/21/OUT) for Land North of Toddington Lane, Littlehampton (the Site).
- 1.1.2 The Local Planning Authority is ADC and the Local Highway Authority is West Sussex County Council (WSCC). National Highways have responsibility for the A27, which runs on an east-west axis approximately 1.6km to the north of the Site.

1.2 Site Location

- 1.2.1 The Site is located at the northern extent of the Littlehampton urban area, approximately two kilometres north of the town centre.
- 1.2.2 The A284 runs on a north-south axis and forms one of the most direct routes to the town centre from the Site, as well as linking to the A27 to the north via the Crossbush Roundabout. The nearest access to this route from the Site is the junction with Mill Lane (leading to Toddington Lane). It is noted that a level crossing is present 150m south of this junction which has been cited as a cause of congestion on the local highway network.
- 1.2.3 The recently completed southern section of the Lymminster bypass provides an alternative link to the town centre from the Site. the bypass currently runs south from the Site roundabout to Fitzalan Road, located to the north east of the town centre. This link crosses the railway on a bridge, eliminating the congestion issues caused by the level crossing on the A284. Further details on the planned northern section are included in **Section 3**.

1.3 Relevant Planning History

- 1.3.1 The planning application for the site was validated in January 2022 (reference: LU/417/21/OUT). The proposals comprise an outline application with some matters reserved (except access) for the erection of up to 71 dwellings. The Site is located within a strategic employment land allocation under Policy EMP SP3 Strategic Employment Land Allocations of the Arun Local Plan.
- 1.3.2 It is noted that the Site falls within a consented outline application, previously granted by Arun District Council in January 2013 (LU/47/11) subject to a Section 106 Agreement. This permission was for the construction of up to 1,260 residential dwellings (out of a potential 1,460 dwelling masterplan) up to 13,000 sqm of B1 employment floorspace (including 3,000 sqm Enterprise Centre) up to 3,500 sqm of Class A local facilities and a 100 bed hotel.

1.4 Purpose of Report

- 1.4.1 This report has been prepared to advise ADC on the suitability of the Site regarding the most recent proposals for residential land uses as supported by the Market Strategy Report, which replace the original Local Plan strategic employment designation and subsequent outline consent for B1 employment land uses.



2. SITE PLANNING APPLICATIONS

2.1 Consented 2011 Application

- 2.1.1 An outline planning application was submitted in February 2011 and subsequently granted by ADC in January 2013, comprising of the following:

“Outline application with some matters reserved for mixed use development comprising: demolition of existing buildings and structures, up to 1,260 residential dwellings (out of a potential 1,460 dwelling masterplan), up to 13,000 sqm of B1 employment floorspace (including 3,000 sqm Enterprise Centre), up to 3,500 sqm of Class A local facilities, a 100 bed hotel, 60 bed care home, a new 2 Form Entry primary school, community centre, youth and 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 A259 bridging over the railway line with additional access from Mill Lane & Toddington Lane”.

- 2.1.2 This application encompasses land that forms part of the North Littlehampton Strategic Employment Land allocation, as detailed in the adopted Arun Local Plan 2011-2036 – Policy EMP SP3.
- 2.1.3 It is understood that the implementation of this consent has financially aided the delivery of significant local infrastructure works and improvements, including the southern section of the A284 Lyminster bypass (discussed in further detail below).

2.2 2021 Application

- 2.2.1 An outline planning application was submitted in December 2021, comprising of the following:

“Outline application with some matters reserved (except access) for the erection of up to 71 No dwellings”.

- 2.2.2 This application covers two parcels of land, both located immediately to the west of the Lyminster Bypass/Anderson Way roundabout. A location plan is shown in **Figure 1** below.



Drawing is based on the following information:

- OS Plan, received 13/06/19.
- Survey undertaken by Encompass Surveys dated 18 June 2021.
- SLB1 Rev. E - Landscape Proposals (Sheet 1 of 2) dated 06/03/18 from application LU/278/17/RES

Scale Bar 1:1250m

North Arrow

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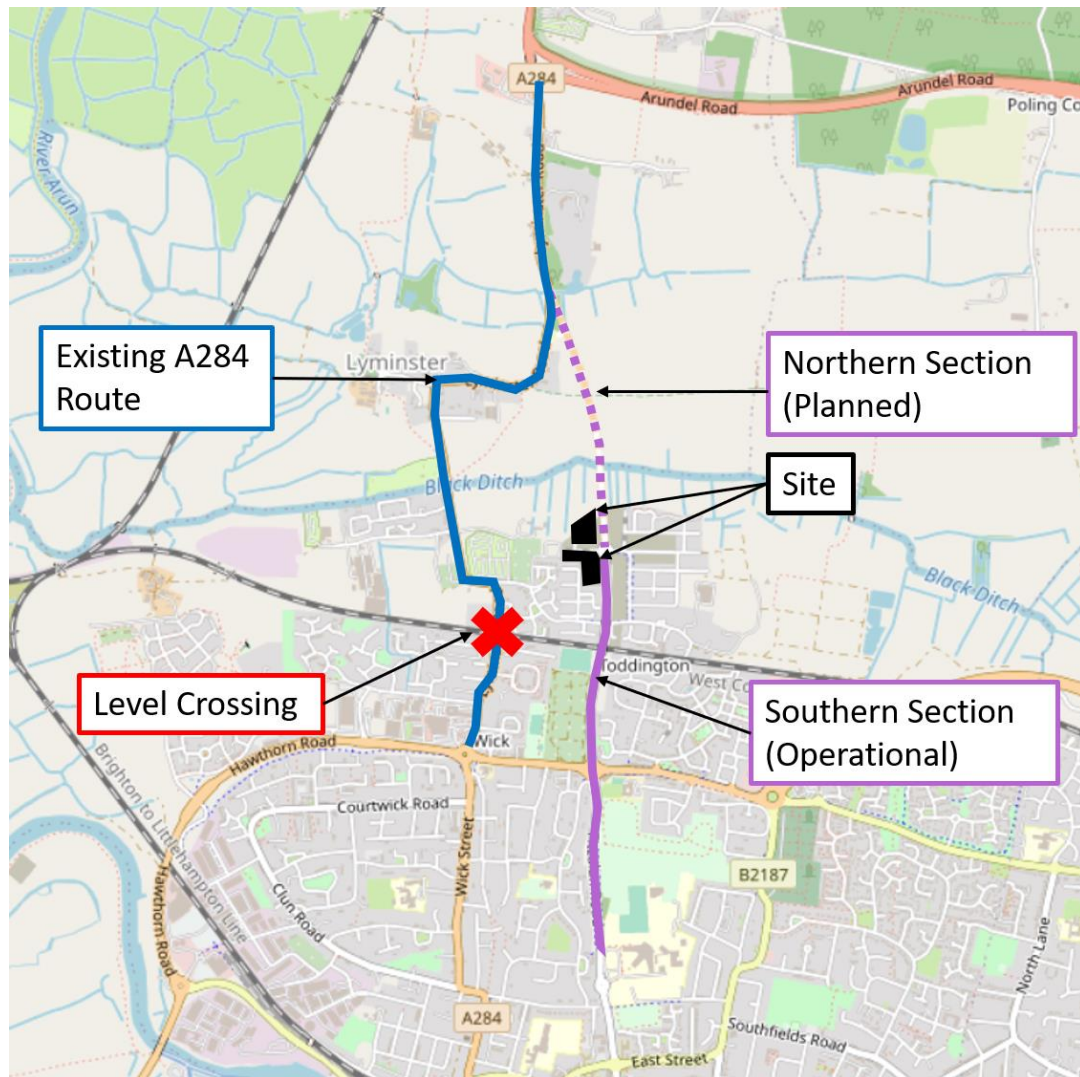
2.2.3	The two plots of land are separated by a local access road. The design of the vehicle access points to both plots has been left unaltered from the consented 2011 outline application.
2.2.4	It is noted that these plots of land consisted of B1 land use floorspace as part of the consented 2011 outline application. No land uses other than residential are proposed as part of the 2021 application.
2.2.5	It should also be noted that both parcels of land are required by West Sussex as construction compounds for the Lyminster bypass. Therefore, construction cannot commence until at least March 2023, however as the 2021 application is under determination at time of writing, it is not anticipated that the construction requirements will impact the overall programming for site delivery.
2.2.6	The 2021 planning application is currently awaiting determination by ADC.

3. LYMINSTER BYPASS

3.1 Overview

- 3.1.1 The Lyminster bypass is a partially built road link, with the section connecting Fitzalan Road to the A259 and the Site roundabout currently operational. An overview of the northern and southern sections of the bypass is presented in **Figure 2** below.

Figure 2. Lyminster Bypass Overview



3.2 Current Proposals

- 3.2.1 WSCC has aspirations to extend the bypass north from the Site roundabout to a point on the A284, approximately 600m south of the Crossbush Roundabout junction with the A27. This has been termed the Northern Section.
- 3.2.2 When constructed, the completed bypass will provide a more direct link between Littlehampton and the A27, as well as remove the bottleneck currently caused by the level crossing on the A284 route.
- 3.2.3 It is noted that the Section 106 agreement accompanying the consented 2011 application requires a payment amounting to half of the strategic highways infrastructure costs upon occupation of more than 900 dwellings, with the second half following upon occupation of

more than 1,200 dwellings. In addition, letting the construction contract for the bypass would trigger a 50% contribution from the 2011 consented scheme applicant, regardless of how many dwellings were occupied.

- 3.2.4 Due to the location of the Site adjacent to the roundabout, both parcels of land will be required as construction compounds until March 2023.



4. LOCAL PLAN POLICY POSITION

4.1 Arun Local Plan Overview

- 4.1.1 The Arun Local Plan covers the period running from 2011 to 2031 and was adopted in 2018. The plan sets out the vision for the future of the district and guides development in order to achieve this.
- 4.1.2 The Site falls within the North Littlehampton strategic employment land allocation, as defined by **Policy EMP SP 3** (Strategic Employment Land Allocations).

4.2 Need for Employment Land

- 4.2.1 Paragraph 8.7.1 of the plan highlights the need for a flexible supply of employment land to meet business needs, including the protection and upgrading of existing sites where these are accessible and there is a good prospect of continued employment use. Paragraph 8.7.4 goes on to acknowledge that in recent years, there have been strong development pressures for the conversion of employment sites and premises to higher value uses such as housing and retail. This has led to the loss of a number of employment sites, which has accentuated the imbalance between housing and employment provision in the local area.
- 4.2.2 It is acknowledged that the Site does not currently contain any existing employment land uses, however the principles of a change in land use have been noted given that the site is allocated for employment within the Local Plan and therefore it is considered that the principles of determining acceptability for change of use are relevant.

4.3 Change of Land Use

- 4.3.1 Paragraph 8.7.5 states that the plan accepts that identified housing need may be present but considers that the change of use from employment may be inappropriate compared to alternatives, including a need to retain or promote economic vitality.
- 4.3.2 Before any change of use from employment will be considered through the Local Plan, it should be 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 an agreed methodology at pre-application stage. An assessment will need to, but not exclusively, reference:
 - Location of the site;
 - Quality and suitability of buildings;
 - Site layout;
 - Accessibility;
 - Proximity to major transport routes;
 - Other uses in the neighbourhood;
 - Cost of demolition or refurbishment set against future value for employment uses
 - Length of time the site has been vacant and the efforts made to market the site in ways to attract different types of employment uses; and
 - Impact of an alternative use upon the amenity and viability of other business uses in the vicinity of the site.
- 4.3.3 Paragraph 8.7.7 puts forward various options for the re-use of sites, including refurbishment, sub-division of premises or re-development of a site for different employment purposes, such



as small starter or 'move-on' units. Live/work units or mixed uses on a site may be considered as an option before a change of use away from employment.

4.3.4 **Policy Emp DM1** (Employment Land – Development Management) states that a change of use from Business Class (B1-B8) or similar sui generis uses will not be permitted unless:

- It is demonstrated that the site is no longer required and is unlikely to be re-used or re-developed for industrial/commercial purposes. This should include clear demonstration of marketing, viability appraisal and the suitability of the site to accommodate the proposed use - using a methodology to be agreed at pre-application advice stage; or
- The existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved.

4.3.5 Policy Emp DM1 also mentions that ADC will seek to direct office development to the town centres.

4.3.6 Despite the protections in place through the Local Plan to safeguard employment land from an unnecessary and detrimental change of use, paragraph 8.11.1 highlights the NPPF requirement for regular reviews of employment land allocations, enabling the Local Plan to be kept up to date.

4.3.7 In addition, migration patterns will be reviewed and housing strategy reconsidered on both the basis of evidence and progress towards achieving the plan's core goal of local employment growth. Employment land reviews will help to avoid the long-term protection of employment sites where there is little prospect of them being brought forward for employment uses; instead allowing alternative uses that support sustainable local communities.



5. FEASIBILITY FOR CHANGE OF USE

5.1 Overview

- 5.1.1 In order to support the residential planning application and a change of use from the Local Plan's employment allocation, SHW has prepared a Market Strategy Report, dated October 2021, in order to assess the feasibility of an employment-led development at the Site.
- 5.1.2 This section assesses the contents of the Market Strategy Report in order to determine whether the criteria relating to a change of land use from employment, outlined in paragraph 8.7.5 of the Local Plan and reproduced in **Section 4.3** of this document, have been met.

5.2 Site Layout, Location & Proximity to Transport Routes

- 5.2.1 The layout and location of the Site in relation to the immediate vicinity and more widely in terms of its relationship to Littlehampton is briefly detailed in Section 2 of the Market Strategy Report. It is noted that the office land uses would provide a nearby place of employment for the up to 1,460 dwellings forming part of the consented 2011 scheme.
- 5.2.2 It is noted that the Site is approximately 2.6km or a 32 minute walk away from Littlehampton station. It is therefore considered that a linked trip to any potential employment development at the Site would only realistically be possible by cycle.
- 5.2.3 Section 3.3 of the Market Strategy Report argues that existing demand for office accommodation within Littlehampton is at the smaller end of the scale and is typically required on flexible lease terms. It is noted that there is greater demand for smaller office units rather than larger office spaces. Although the availability of office space appeared to be limited, current trends suggest it is adequate in terms of both current and likely future demand. It is anticipated that the current office stock in Littlehampton would be able to sufficiently meet a potential uptake in demand.

5.3 Quality & Suitability of Buildings

- 5.3.1 As the 2021 application relates to a change of use regarding the employment allocation, instead of an existing development, it is deemed that this category is not relevant to the Market Strategy Report.

5.4 Accessibility

- 5.4.1 The Market Strategy Report briefly mentions the Lyminster bypass in Section 2, in particular the southern section which connects the Site to Littlehampton.
- 5.4.2 It is noted that the future construction of the northern section will provide an almost direct connection from the Site to the A27, which forms part of the Strategic Road Network.
- 5.4.3 It is considered the Market Strategy Report partially justifies the change of use based on the Site location. However, the future completion of the bypass northern section would significantly improve highway connectivity between the Site and the Strategic Road Network, increasing the potential catchment area of an office development.
- 5.4.4 It is however noted that an office development which would likely result in a dominant vehicle trip mode share would not fit the overall aims and objectives of the NPPF and the Local Plan relating to sustainable development. As previously identified Policy Emp DM1 mentioned that ADC will seek to direct office development to town centres, with the site being over 30

minutes' walk from Littlehampton station it is not considered an accessible walking distance and would need to be part of a linked trip with another mode such as cycling and therefore small more central locations for office developments may be sought as alternative potential locations for employment.

5.5 Other Uses in Neighbourhood

- 5.5.1 The land uses forming part of the consented 2011 outline application are discussed in the Market Strategy Report, within Section 2. The Site's previous use and the surrounding area land uses are also referenced.

5.6 Cost of Demolition/Refurbishment

- 5.6.1 The Market Strategy Report provides a financial assessment in Section 4.1. A rent of £16 per square foot (psf) was used for robustness, which exceeded the highest achieved rent in either Littlehampton or Worthing (£13.66 psf at the Wicker & Eagle House, with the NHS as tenants). As previously noted, the future completion of the Lyminster bypass northern section would significantly improve highway connectivity between the Site and the Strategic Road Network, increasing the potential catchment area of an office development and could result in increased rent values, however as £16 psf has already been accounted for it is felt that the impact of this improved accessibility has already been factored into the viability assessment.
- 5.6.2 This assessment demonstrates that the build cost in comparison to future value would result in a deficit of £6,197,820 when assuming a rent of £16 psf.
- 5.6.3 It is therefore concluded that an office development at a generous market rent would likely not be financially viable at the Site.
- 5.6.4 It should be noted that this assessment was conducted using rent values agreed before the Covid-19 pandemic, after which working from home became much more widespread amongst the working population. It is considered that current and future rents for office space would be substantially less than pre-Covid-19, therefore lending further robustness to the conclusions drawn.

5.7 Vacancy Period & Marketing Efforts

- 5.7.1 The Market Strategy report discusses different types of employment development to offices, in Section 5. The types mentioned are general industrial, storage and distribution.
- 5.7.2 It was concluded that these land uses are not suitable for the Site, due to the out of town location in close proximity to future residential neighbourhoods. The aspirations of ADC for a "gateway" – style development at this location, as evidenced by the wider outline site being allocated for a majority residential development, was also cited as a reason why a more industrial employment use would be inappropriate for this location.
- 5.7.3 The Market Strategy Report did not provide commentary on further alternative uses to residential. It is considered that there is the potential for introducing small SME office space, or the provision of other commercial uses which would support residents and provide some level of employment at the Site. With respect to the financial viability issues discussed above, it is considered that provision of a residential-led development would raise sufficient finances to make these uses viable.



5.8 Impact of Alternative Uses

- 5.8.1 The Market Strategy Report does not discuss alternative uses other than residential in any great detail. General industrial, storage and distribution uses were all briefly considered potential alternative employment land uses to office.
- 5.8.2 SYSTRA noted that land for industrial uses is provided within the Riverside Industrial Estate, located to the west of Littlehampton station. It is considered that the Site would not support the industrial uses in this area as this would detract from the aspired high quality “gateway” development and that it would be more advantageous to concentrate industrial uses in specific zones (such as the Riverside Industrial Estate) rather than mixing with residential use, given the complex requirements for safety management in such a scenario to limit interactions between pedestrians and HGV movements.
- 5.8.3 It is noted that commercial land use capacity is available within the Riverside Industrial Estate and the Lineside Industrial Estate located the north west of Littlehampton town centre. It is considered that the Riverside Industrial Estate site is constrained by the River Arun, A250 and B2187 routes and the railway. The possibility of expansion of the Riverside industrial estate into the immediate vicinity is therefore deemed remote. It is therefore deemed beneficial to prioritise the occupancy of vacant plots within the existing industrial estate capacity in Littlehampton, over extending industrial/commercial land uses into new areas as part of wider residential masterplans.
- 5.8.4 Due to the Site’s location on the northern fringes of the Littlehampton urban area and not within easy reach of public transport services, it is considered that a purely residential development at the Site would result in a mode share relying heavily on private car trips. This would contradict the objectives relating to sustainable transport in the NPPF and ADC Local Plan. The development should consider the principles of sustainable development by minimising the required trip making through the provision of local services and facilities alongside the residential units. This aligns with Policy HWB SP1 of the ADC Local Plan which outlines the need to promote healthy communities by encouraging ‘mixed use development and multi-use community buildings that reduce the need to travel by providing housing, services and employment in close proximity to each other’.
- 5.8.5 It is therefore considered that more thought should be given by the applicant to the potential of the Site to be delivered as a residential-led mixed use development rather than purely residential, with ancillary uses such as SME office space (as mentioned in Section 5.7), retail or commercial to support and complement the residential elements. This would enable some degree of employment at the Site as well as potential for the generation of more internal trips by active modes compared to a purely residential development, with the wider masterplan site of up to 1,460 dwellings serving as a catchment area for and supporting the viability of non-residential uses.



6. CONCLUSION

6.1 Overview

- 6.1.1 SYSTRA has been commissioned by Arun District Council to advise on a Market Strategy Report, in support of a planning application for Land North of Toddington Lane, Littlehampton. The Site is located to the north of Littlehampton and currently falls within a strategic employment land allocation as defined in the Arun Local Plan. The current proposals comprise an outline application with some matters reserved (except access) for the erection of up to 71 dwellings.

6.2 Site Location & Accessibility

- 6.2.1 The Market Strategy notes the clustering of office land uses in established town/city centre locations accessible by public transport, such as Brighton. Given the Site's out of town location, it is considered that an office land use would rely on private vehicle trips for the majority of commuters, especially with the completion of the northern section of the bypass, which would run somewhat contrary to the aims of the NPPF and Arun Local Plan relating to sustainable development.
- 6.2.2 SYSTRA therefore considers that the argument of established town centre locations being more appropriate for office land uses is valid.
- 6.2.3 SYSTRA considers that the future completion of the bypass northern section would significantly improve highway connectivity between the Site and the Strategic Road Network, increasing the potential catchment area of an office development. It is however noted that an office development which would likely result in a dominant vehicle trip mode share would not fit the overall aims and objectives of the NPPF and the Local Plan relating to sustainable development.

6.3 Financial Viability

- 6.3.1 The analysis conducted in the Market Strategy Report suggests that a purely office land use for the Site would not be commercially viable with a financial deficit of over six million pounds. SYSTRA accepts this conclusion as robust, given the rental rate used and the change in market conditions post-Covid-19. As £16 psf has already been accounted for in the viability assessment, when the highest achieved rent in either Littlehampton or Worthing is £13.66, it is felt that the impact of this improved accessibility has already been factored into the viability assessment.

6.4 Alternative Uses

- 6.4.1 General industrial, storage and distribution uses were all briefly discussed as potential alternative employment land uses to office by the Market Strategy Report, however it was concluded that these uses would not be appropriate to be located within a wider residential development. SYSTRA considers that it would be more appropriate to make better use of existing capacity and concentrate these uses in a dedicated location, such as the Riverside Industrial Estate.
- 6.4.2 It is considered that there is potential for introducing a more mixed-use development compared to the current proposals, encompassing smaller office spaces, or the provision of retail or commercial uses which would support some degree of employment at the Site as well as potential for the generation of more internal trips. Such a provision would at least in

part fulfil the allocation detailed in Policy EMP SP3 of the Local Plan and reduce the level of external vehicle trips from surrounding areas, with more facilities within reach by walking and cycling. The wider masterplan site of up to 1,460 dwellings would serve as a catchment area for and support the viability of non-residential uses.

6.5 Conclusion

- 6.5.1 SYSTRA broadly accepts the conclusions drawn by the Market Strategy Report and considers that a residential-led development would be the most appropriate land use for the Site, despite the Local Plan allocation for employment uses.
- 6.5.2 It is recommended that further consideration be given for the Site to be delivered as a residential-led mixed use development rather than purely residential, with ancillary uses such as SME office space, retail or commercial to support and complement the residential elements, in order to provide opportunities for internal trips by active modes, facilitating promotion of a more sustainable development.



APPROVAL

Version	Name		Position	Date	Modifications
1	Author	CD	Senior Consultant	19/08/2022	
	Checked by	EJ	Principal Consultant	19/08/2022	
	Checked by	EJ	Principal Consultant	19/08/2022	
2	Author	CD	Senior Consultant	05/09/2022	Responding to Client Comments
	Checked by	EJ	Principal Consultant	05/09/2022	
	Approved by	JS	Projects Director	05/09/2022	
3	Author	CD	Senior Consultant	06/10/2022	Responding to Client Comments
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	Approved by	JS	Projects Director	06/10/2022	

