

EMAIL ONLY

Hannah Kersley

hannah.Kersley@arun.gov.uk

Mocatta House
Trafalgar Place
Brighton
BN1 4DU

████████████████████
████████████████████
URL www.dowsettmayhew.com

1 September 2025

Dear Hannah

LU/83/25/OUT - Outline planning application (with all matters except access reserved) for the construction of 31 No. residential units at Westholme Nursery Toddington Lane Littlehampton BN17 7PP

I write in reference to the above application currently pending determination with the Local Planning Authority.

We have been closely monitoring the progress of the application via the Council's online planning register and note the recent submission of comments from the Council's Leisure and Landscapes Officer. These comments raise a landscape objection on the grounds of insufficient provision of Public Open Space (POS) and a Local Area for Play (LAP).

It is acknowledged that the Council's adopted Open Space, Playing Pitches, Indoor and Built Sports Facilities Supplementary Planning Document (SPD) (2020) is a material consideration in the determination of this application. The SPD reflects best practice guidance from Fields in Trust and Sport England, and at paragraph 1.3, it states:

"the SPD is given great weight following consultation and adoption and the Council maintain the FIT quantity standard as a material consideration within the SPD but the standard may be subject to negotiation on the grounds of viability at application stage for DM purposes."

Further, paragraphs 1.5 - 1.6 clarify that:

"In some instances, the most effective means of meeting the additional demand from a new development will be through providing on-site provision within a development. Equally, in some instances the most effective means will be through the provision of new or enhancement of existing facilities within a reasonable distance.

This OS SPD therefore, provides a methodology to enable developers and Development Management officers to calculate the needs for on-site or off-site forms of provision, according to the demand generated by the scale and type of proposed development, and to negotiate the associated land provision, financial contributions and maintenance costs."

The SPD therefore provides a flexible methodology for calculating open space needs based on the scale and type of development, allowing for negotiation around land provision, financial contributions, and maintenance costs.

This flexibility is embedded in Local Plan Policy OSR DM1, which states:

“Housing and, where viable, commercial development will be required to contribute towards:

- a. Open space provision in accordance with guidance set out in the current Open Space Study In some parts of the District open space provision is identified as being sufficient in terms of quantity. Therefore, provision of new open space is not deemed necessary but what is needed is to seek contributions for quality improvements and/or new offsite provision in order to address any future demand. For larger scale developments, the quantity standards should be used to help determine the requirements for open space provision as part of that development.*
- b. Playing pitch provision in accordance with guidance set out in the Playing Pitch Strategy. This will include improvements to existing provision to increase playing capacity and providing hubs of new pitches.*
- c. Indoor sport and leisure facilities through financial contributions in accordance with guidance set out in the Indoor Sport and Leisure Facilities Strategy which identifies a need for a new leisure centre in the West of the District.*
- d. Strategic projects identified in the Leisure and Cultural Strategy.”*

The supporting text to this policy further confirms that:

“There may be occasions when it is not appropriate to provide facilities on site. In these cases the Council will collect financial contributions from developers and allocate those contributions to specific projects which deliver the Strategic Priorities identified in this chapter and within Arun District Council strategies and studies which inform this Policy. The strategic nature of the projects means that they will benefit residents across Arun District, not just the occupants of the development which has made the financial contribution.”

This approach aligns with Paragraphs 98 and 103 of the National Planning Policy Framework (NPPF), which advocate for:

- Positive planning for shared spaces and community facilities to enhance sustainability.
- Access to high-quality open spaces and opportunities for sport and physical activity, which support health, well-being, biodiversity, and climate resilience.

While the SPD therefore serves as a starting point for assessing open space needs, it is clear that it allows for case-by-case flexibility. On-site provision is not always required, particularly where existing facilities are accessible and sufficient.

This principle was recently upheld in appeal decision APP/C3810/W/24/3354570, where the Inspector concluded:

“Even though the site does not provide an area of POS that achieves the level sought by the Open Spaces SPD, it is unclear as to why such a provision is sought in this case. The Policy, when read plainly, does not require specific provision on site and I have not been directed to any specific policy or guidance which indicates that the area in which the site is located as an under-provision of POS; whether in terms of quality or quantity.

Furthermore, the facts on the ground, informed by my site inspection, are that there are areas of POS provided within close proximity to the appeal site. This includes the Lido at Arundel, parks and gardens, riverside walks, and Public Rights of Way. There is also the South Downs

National Park located on the other side of the A27, which can be easily accessed either via the underpass by the railway station, or across the A27 highway.”

In the case of the current application site, it is located adjacent to significant areas of existing green space, as shown on the Council's Local Plan Policies Map.

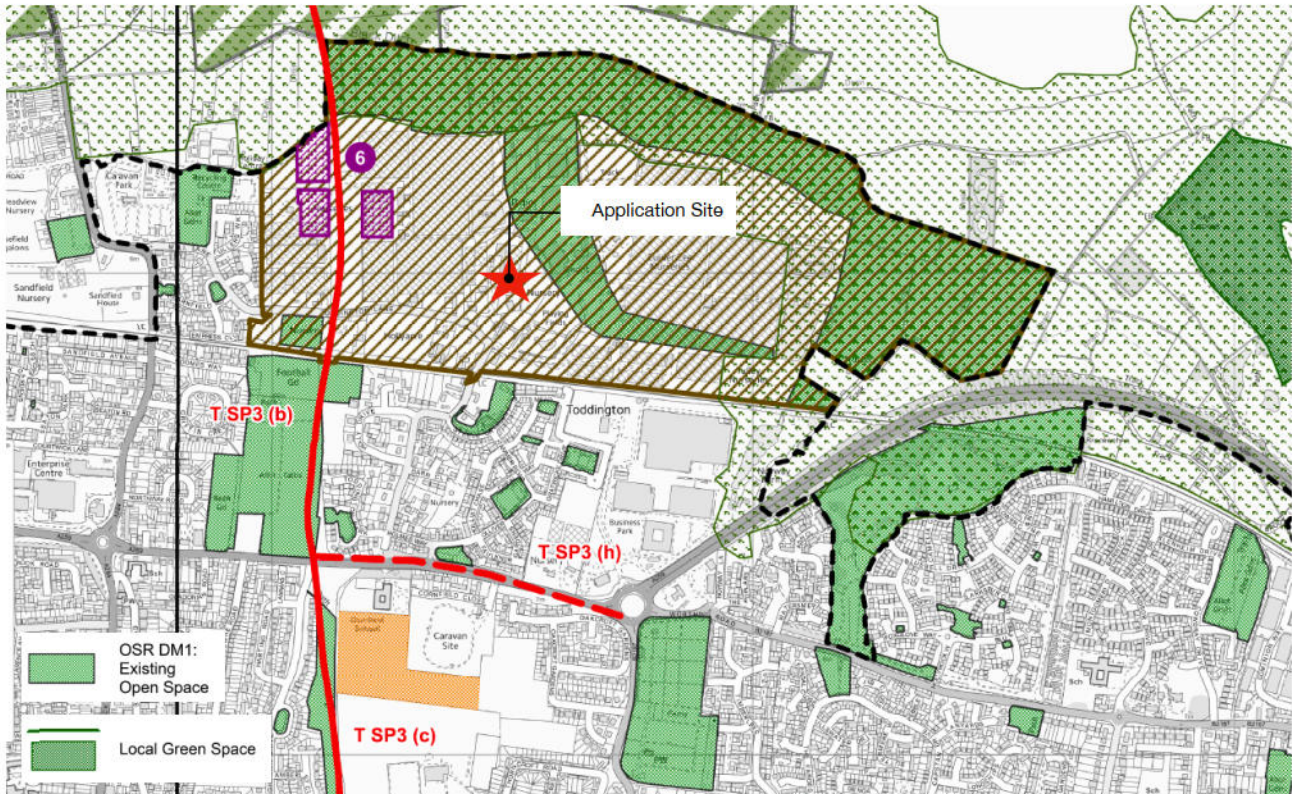


Figure 1 - Extract from Arun Local Plan 2011-2031 Policies Map 4 Littlehampton & Surrounding Area

Moreover, the wider LU/47/11 development, within which this site sits centrally, has already secured substantial POS to meet both formal and informal recreational needs.

Although the application site was excluded from LU/47/11, it is evident that it benefits from proximity to these established open spaces. The proposed layout for 31 dwellings includes generous private amenity space and communal areas for the flats, further supporting the recreational needs of future residents.

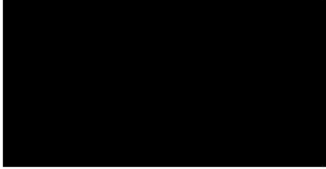
In light of this, we submit that the proposal meets the objectives of the NPPF by providing access to a network of high-quality open spaces and opportunities for physical activity. On-site POS provision is not necessary in this instance.

Furthermore, the absence of on-site POS allows for the most efficient use of land for housing delivery, as encouraged by the NPPF. Given the Council's acute housing land supply shortfall, the delivery of 31 new homes should be given significant weight.

In considering the proposals under the titled balance of paragraph 11 of the NPPF (engaged by virtue of the absence of a five year housing land supply) it is submitted that the shortfall in meeting SPD guidelines would not significantly and demonstrably outweigh the meaningful

benefits in terms of housing provision. In therefore in conclusion, we respectfully submit that the proposal should be supported.

Yours sincerely



Sarah Sheath BSc (Hons) DipTP MRTPI
Senior Planner

[Redacted]

[Redacted]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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[REDACTED]
[REDACTED]
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Littlehampton, West Sussex, BN17 5LF
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|-------------------------------------|--|--|--|--|

From: Sarah Sheath [REDACTED]
Sent: 01 September 2025 11:03
To: Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: LU/83/25/OUT - Land at Westholme Nursery, Littlehampton

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Dear Hannah,

I write in reference to the above planning application currently pending determination with the Local Planning Authority.

We have been monitoring the progress of the application on the local authority's online planning register and would appreciate your attention to the attached correspondence in response to the comments recently submitted by the Council's Leisure and Landscapes Officer.

Kind regards
Sarah

Sarah Sheath
BSc (Hons) DipTP MRTPI
Senior Planner

[REDACTED]
[REDACTED]

W: www.dowsettmayhew.com

dowsettmayhew Planning Partnership
Mocatta House | Trafalgar Place | Brighton | BN1 4DU

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