

# Planning Statement

**Outline Planning Application (with All Matters Except Access Reserved)  
for the Construction of 31 Residential Units**

**On Land at at Westholme Nursery, Toddington Lane, Littlehampton,  
BN17 7PP**

Prepared for

**Mr A Hussain**

Prepared by

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Date

**May 2025**

Version

**FINAL**

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## 1. INTRODUCTION

- 1.1. This Statement is prepared on behalf of Mr A Hussain in support of an Outline Planning Application for the erection of 31 dwellings, with all matters reserved except access, on the sites known as Westholme Nursery, Knightscroft and Anggerik, on land to the north of Toddington Lane, Wick, Littlehampton.
- 1.2. The application is submitted in outline form with all matters, except access, reserved for subsequent determination. The application seeks determination on the means of access to the site, which is proposed from Toddington Lane. Notwithstanding this, the application is supported by indicative plans to detail the proposed residential development of the site, as well as a number of supporting documents to demonstrate the proposed scheme can be sensitively integrated into the existing environment while addressing key planning considerations.
- 1.3. The site lies within the built-up area of Toddington, near Wick. It is situated within a committed strategic housing allocation where numerous residential developments have been constructed, including immediately adjacent to the Westholme Nursery site.
- 1.4. The site was historically occupied by Westholme Nursery glasshouses but this nursery use ceased some 18 years ago.
- 1.5. Outline planning permission has previously been secured on site under LU/94/17/OUT for residential re-development comprising 10 no. dwellings and associated works. Whilst this permission has since expired, it is still considered to be of relevance insofar as confirming the principle of residential development on this site is acceptable.
- 1.6. In addition to this Statement, the application should be read in conjunction with the following documents and drawings:
  - Block & Site Location Plan - drawing no. TA1057 01 Rev A;
  - Proposed Site Plan - drawing no. TA1057 10 Rev A;
  - Proposed Sections - drawing no. TA1057 11 Rev A;
  - Proposed Sections - drawing no. TA1057 12 Rev A;
  - Proposed 2 Bed Units - drawing no. TA1057 13;
  - Proposed 3 Bed Units - drawing no. TA1057 14;
  - Proposed 4 Bed Units - drawing no. TA1057 15;
  - Proposed AF Units 1-6 - drawing no. TA1057 16;
  - Proposed AF Units 7-10 - drawing no. TA1057 17;
  - Proposed Section AA - drawing no. TA1057 18 Rev A;
  - Proposed Section BB - drawing no. TA1057 19 Rev A;
  - Proposed Section CC - drawing no. TA 1057 20 Rev A;
  - Proposed Sections DD, EE & FF - drawing no. TA1057 21 Rev A;
  - Proposed Sections GG, HH & JJ - drawing no. TA1057 22 Rev A;

- Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment by The Ecology Partnership, dated July 2024;
- Statutory Biodiversity Metric completed by The Ecology Partnership, dated 31st July 2024;
- Transport Statement by GTA Civil & Transport, dated 24th March 2025; and
- Flood Risk Assessment and Drainage Strategy by CTP Consulting Engineers, dated 19th March 2025.

1.7. This Statement details the application site and its surroundings, sets out relevant planning history, approved residential developments on neighbouring sites, planning policy, and assesses the scheme in accordance with the requirements of the Development Plan, and other material considerations, including the National Planning Policy Framework (NPPF).

## **2. SITE AND SURROUNDINGS**

- 2.1. The application site is located in the northern part of Littlehampton known as Wick, north of the A259.
- 2.2. The site is relatively rectangular in shape and extends to approximately 0.71 Hectares (Ha).
- 2.3. The site is mostly laid to grass with a small number of existing buildings positioned towards the southern end of the site. These buildings include a derelict single storey building once used in association with the former nursery; a vacant single storey dwelling known as 'Anggerik'; and an occupied residential property known as 'Knightscroft', with associated domestic outbuildings. Knightscroft is located immediately north of Toddington Lane and features separate vehicular access.
- 2.4. The northern portion of the site was historically used for horticultural use by the Westholme Nursery glasshouses. This nursery use ceased some 18 years ago.
- 2.5. The Westholme Nursery site is bordered to the north and west by residential development, also forming part of the committed Strategic Site. To the south of Knightcroft lies a large grass verge and Toddington Lane beyond, and to the east of the site lies the mixed commercial site known as 'Five Stones'.
- 2.6. Immediately to the east of Knightscroft lie three, two-storey terraced dwellings which were erected circa 2017.
- 2.7. The application site is mostly bound by close board timber fencing.
- 2.8. The topography of the site is generally flat.
- 2.9. There is an existing vehicular access serving Westholme Nursery from Toddington Lane, which is sited on the western side of the southern boundary.
- 2.10. There are no Public Rights of Way (PRoWs) which intersect, or lie immediately adjacent to the site. The nearest PRoW comprises the footpath '3096' which lies a short distance to the east and runs in a north east direction towards the village of Poling.

### 3. RELEVANT PLANNING HISTORY

#### 3.1. Westholme Nursery:

**LU/94/17/OUT** - Outline application with all matters reserved for residential redevelopment comprising of 10 no. dwellings and associated works. **Approved 20 July 2017.**

#### 3.2. Knightscroft:

**LU/131/16/PL** - 3 no. terraced chalet bungalows with car parking. **Approved 10 August 2016.**

#### 3.3. North Littlehampton Strategic Development Site - Outline:

**LU/47/11** - 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. **Approved 23 January 2013.**

**LU/182/15/PL** - 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 and traffic improvements. **Approved 03 October 2018.**

#### 3.4. North Littlehampton Strategic Development Site - Reserved Matters:

**LU/114/15/RES** - Approval of Reserved Matters following outline permission LU/47/11 for layout, appearance and landscaping of access roads. **Approved 08 July 2016.**

**LU/117/15/RES** - Approval of reserved matters following outline consent LU/47/11 for construction of 117 dwellings together with associated internal road network, car parking & landscaping on parcels B3 & B5 following demolition of existing glasshouses & buildings. **Approved 21 April 2016.** This reserved matters approval is for the Bovis development parcel immediately to the west of the site.

**LU/121/17/RES** - Approval of reserved matters following outline consent LU/47/11 for construction of 126 no. dwellings together with internal road network, car parking and landscaping. **Approved 20 December 2017.** This reserved matters approval is for the Persimmon development parcel immediately to the north of the site.

## 5. RELEVANT PLANNING POLICY

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.2. The Development Plan comprises:
  - Arun Local Plan 2011-2031 (July 2018); and
  - The Littlehampton Neighbourhood Plan 2014-2029 (Made 05 Nov 2014).
- 3.5. Material considerations include the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG), adopted Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs). It also includes the Arun Interim Housing Statement (IHS).
- 3.6. The LPA are also currently working on a new Local Plan to replace the current Local plan adopted in 2018. The LPA agreed to resume the Local Plan update in July 2023, after works being paused in both 2021 and 2022.
- 3.7. In March 2024, the LPA ran a Regulation 18 Issues & Options consultation referred to as the “Direction of Travel Document”. The purpose was to gather public views on various planning issues and potential development strategies within the District. The consultation ran from 25th March to the 13th May 2024.
- 3.8. Going forward, the LPA is currently indicating that they plan to release a draft version of the new Local Plan for further public consultation in 2026.

### National Planning Policy Framework

- 5.3. The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development. It notes that this can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 5.4. Paragraph 7 sets out that the purpose of the the planning system is to contribute to the achievement of sustainable development, including the provision of homes. It is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 5.5. Paragraph 8 sets out that achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways.
- 5.6. Paragraph 10 states that so sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

- 5.7. Paragraph 11 states that “plans and decisions should apply a presumption in favour of sustainable development.. for decision taking this means:
- *approving development proposals that accord with an up-to-date development plan without delay; or*
  - *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
    - *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
    - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”*
- 5.8. Paragraph 48 sets out that “Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”
- 5.9. Paragraph 49 states that “Local planning authorities may give weight to relevant policies in emerging plans according to:
- the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
  - the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”
- 5.10. Chapter 5 of the NPPF confirms the Government’s objective of significantly boosting the supply of homes. Paragraph 73 acknowledges the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, noting that they are often built-out relatively quickly.
- 5.11. Chapter 8 relates to promoting healthy and safe communities. Paragraph 96 sets out that “planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

- are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
  - enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- 5.12. Chapter 9 requires LPAs to promote sustainable transport, with significant development focused on locations which are, or can be made, sustainable through limiting the need to travel and offering a genuine choice of transport modes.
- 5.13. Paragraph 115 states that *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
- *sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
  - *safe and suitable access to the site can be achieved for all users;*
  - *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
  - *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach”*
- 5.14. Paragraph 116 states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*
- 5.15. Chapter 11 relates to making an effective use of land. Paragraph 124 sets out that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 5.16. Chapter 12 relates to achieving well-designed places. Paragraph 131 states that the creation of high quality, beautiful 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. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

## Arun Local Plan (2018)

- 5.17. The Plan Period for the Arun Local Plan (ALP) is 2011-2031, and it was adopted in July 2018. The most relevant Policies to this proposal include:
- 5.18. **SD SP1: Sustainable Development** - Reiterates the NPPF's presumption in favour of sustainable development set out in the NPPF, and the requirement for LPAs to work positively and proactively with developers.
- 5.19. **SD SP1a: Strategic Approach** - Sets out the overall strategy for sustainable growth to 2031, which focuses on Littlehampton and Bognor Regis as the main centres for growth. It sets out the aim to provide for the housing needs of the community by delivering 20,000 homes of an appropriate scale and tenure. The broad location for development is set out in **SD SP2: Built-Up Area Boundary**, which confirms that development within the Built-up Area Boundaries will be permitted, subject to consideration of other relevant Policies. The site lies within the Built-up Area of Littlehampton.
- 5.20. **HOR DM1: Horticulture** - Acknowledges that horticulture is a key employment sector in the District and only allows for the redevelopment of under-used, redundant or derelict glasshouses, polytunnels or pack houses where the redundancy to the horticultural and agricultural industry is proven by the applicant to the satisfaction of the Council. It sets out a preference for redevelopments for countryside-based enterprises that support the rural economy.
- 5.21. **H SP1: The Housing Requirement** - Sets out that the District will deliver at least 20,000 new homes in the period 2011 to 2031. Although the North Littlehampton site is not included in the Strategic Housing Site Allocations, the application site is included in the 'Commitments (Large Sites)' intended to deliver a total of 3,090 in accordance with Table 12.2 of the Plan. **Map 4** (July 2018) accompanying the Local Plan shows the extent of 'Committed Strategic Housing Allocations'. The site lies within one of these, known as North Littlehampton.
- 5.22. **H DM1: Housing Mix** - Seeks a mix of dwelling types and sizes, to include affordable units and family sized accommodation. It also confirms that the Council will require a balanced mix of market and affordable units on sites of 11 units or more. The Policy does not specify a tenure mix, but requires new developments to have regard to the latest Strategic Housing Market Assessment recommendations.
- 5.23. **AH SP2: Affordable Housing** - Requires all developments of 11 or more dwellings to provide a minimum of 30% of the dwellings as affordable units on site. It acknowledges that this may not be viable, and allows for flexibility to provide this off site or by way of a commuted sum in exceptional circumstances where supported by robust evidence. It sets out the target tenure mix of affordable units of 75% rented and 25% intermediate housing. The affordable mix should focus on 1 and 2 bedroom units, with a limited provision of 3 and 4+ bedroom units. It requires all planning applications that include residential development, either in whole or in part, to include an Affordable Housing Statement.
- 5.24. **D SP1: Design** - Sets out the core design principles for new development in the District, to ensure that they are based on a thorough site analysis and context appraisal, make efficient use of land and reflect the characteristics of the site and locality in their layout, landscaping, density, mix, scale,

massing, character, materials, finish and architectural details. **D DM1: Aspects of Form and Quality** follows on from these core design principles, providing detailed guidance on design quality.

- 5.25. **D DM2: Internal Space Standards** - Requires new development to meet the Nationally Described Space Standards.
- 5.26. **ECC SP1: Adapting to Climate Change** - States the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change, such as increased probability of flooding. This Policy has links/overlap with **WDM2: Flood Risk**, **WDM3: Sustainable Urban Drainage Systems** and **ECC SP2: Energy and Climate Change Mitigation**. **ECC SP2** requires new developments to incorporate energy efficiency measures that reflect current standards and use design and layout to promote energy efficiency. It requires all Major developments (i.e. 10 or more dwellings) to produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site.
- 5.27. **T SP1: Transport and Development** - Seeks to deliver growth that reduces congestion, tackles climate change and promotes healthy lifestyles by ensuring that development provides safe access on to the highway network, contributing to highway improvements and promoting sustainable transport, including the cycle, pedestrian and bridleway network. It places a focus on development which is designed to reduce the need to travel by car and gives priority to pedestrian and cycle movements. This policy has close links with **T DM1: Sustainable Travel and Public Rights of Way**, which requires development to prioritise safe pedestrian and cycle access to the green infrastructure network and access to public transport. It requires development to be located within easy access of established public transport services and existing pedestrian and cycle networks.
- 5.28. **ENV SP1: Natural Environment** - States that the Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment.
- 5.29. **ENV DM4: Protection of Trees** - States that development will be permitted where it can be demonstrated that trees contributing to local amenity will not be damaged or destroyed, and encourages replanting of trees which are lost through development. It requires development on sites where there are existing trees to provide Land and Tree Surveys, a Tree Constraints Plan and an Arboricultural Impact Statement with Tree Protection Plan and Arboricultural Method Statement.
- 5.30. **ENV DM5: Development and Biodiversity** - Reflects the NPPF requirement for development to achieve a net gain in biodiversity. It requires protection of existing habitats on site, and sets out a list of biodiversity enhancements which should be incorporated into new development, such as bat and bird boxes and creation of new habitats.
- 5.31. **W SP1: Water** - Encourages water efficiency measures to be incorporated into new developments and for surface water to be used as a design feature.
- 5.32. **WM DM1: Waste Management** - Requires developments anticipated to cost over £300,000 to identify the volume and type of materials to be demolished and/or excavated as part of the development and identify opportunities for the re-use and recovery of materials on site to minimise off-site disposal of waste. It also requires new residential developments to be designed to ensure that kerbside collection of waste is possible.

- 5.33. **QE SP1: Quality of the Environment** - Requires new development to contribute positively to the quality of the environment and ensure that it does not have a significantly negative impact on residential amenity or the natural environment.
- 5.34. **QE DM2: Light Pollution** - Requires applications involving outdoor lighting to be accompanied by a lighting scheme demonstrating that there will be no adverse impact on neighbouring uses and the wider landscape, being the minimum required for security and minimising glare and light spillage, as well as demonstrating the degree to which outdoor lighting can be powered by on-site renewable sources.
- 5.35. **INF SP1: Infrastructure Provision and Implementation** - Sets out that the LPA will support development proposals which provide or contribute towards the infrastructure and services needed to support development to meet the needs of occupiers and users of the development and the existing community. It requires financial contributions towards off-site provision to support new development where necessary.

### Littlehampton Neighbourhood Plan

- 5.36. The Littlehampton Neighbourhood Plan (LNP) post-dates the 2003 Core Strategy. It sets out the Vision for Littlehampton as:

*“To fundamentally improve the economic, environmental, and social wellbeing of individuals and communities in the town, particularly those in the most deprived areas. To enhance, improve and protect existing community infrastructure and propose new where appropriate, that will deliver excellent local and accessible facilities to all of the Littlehampton population.”*

- 5.37. The LNP contains Policies and proposals intended to assist in achieving the vision. The most relevant Policies to the current proposal include:
- 5.38. **Policy 1** of the LNP reiterates the NPPF’s presumption in favour of sustainable development and confirms that permission will be granted for developments which accord with the Policies of the LNP, as well as that the Town Council will take a positive approach to the consideration of development proposals.
- 5.39. **Policy 2** of the LNP states: *“The Neighbourhood Plan concentrates future housing, economic and community-related development within the built-up area boundary of Littlehampton and especially within the Fitzalan Corridor connecting the strategic housing allocations at North Littlehampton (Toddington - north of the railway) and at Courtwick Park with the Littlehampton Academy, the Town Centre, the Community Hub and ‘The Green’.”*
- 5.40. **Policy 3** of the LNP relates to Housing Supply and sets a target of at least 200 new dwellings in the period 2014-2029 to be delivered on a mix of allocated sites and windfall sites. As per Policy 2, this Policy seeks to concentrate allocations within the Fitzalan corridor area, in recognition that this area has good access to local services and facilities, and also that the strategic development permitted and planned in the area has delivered infrastructure improvements, such as highways and education to support new development. The Policy seeks to focus smaller housing units for the elderly and for young people closest to the local centres, seeking at least half of the dwellings to

have 2 bedrooms or fewer where the site lies within 400m of a designated local centre, and 25% of the units to have 2 bedrooms or fewer on sites that are further than 400m from a local centre.

### Five Year Housing Land Supply Position

- 5.41. ADC's latest Housing Land Supply figures are contained within the Authority Monitoring Report (AMR) published in January 2025. This AMR covers the period from 1 April 2023 - 31 March 2024.
- 5.42. Based on the new Standard Method the table on page 28 confirms the District have a housing land supply of 3.41 years. This is calculated from a total need of 8,856 dwellings from 2024/25 - 2029/30 and a total anticipated supply of 6,035.
- 5.43. As such, this confirms the LPA are failing to meet their requirements and are failing to facilitate the delivery of sufficient homes to meet the district's needs. Accordingly the tilted balance applied by paragraph 11(d) of the NPPF is applicable to the consideration of this application.

### Housing Delivery Test

- 5.44. The results of the HDT for 2018, 2019, 2020, 2021, 2022 and 2023 for the LPA, are as follows:
- 91% November 2018;
  - 68% November 2019;
  - 2019-20: homes required - 1,025; homes delivered - 515 - 61% November 2020 (Published 19 Jan 2021);
  - 2020-21: homes required - 746; homes delivered - 697 - 65% November 2021 (Published 14 Jan 2022);
  - 2021-22: homes required - 1,310; homes delivered - 662 - 61% November 2022 (Published 19 December 2023); and
  - 2022-23: homes required - 1,310; homes delivered 977 - 70% (published 12 December 2024)
- 3.9. The above confirms that the LPA have underdelivered some 994 new homes in the past three years and have only met 70% of their required target.
- 3.10. Similarly to the 5 year housing land supply position, the HDT figures also confirm the presumption in favour of sustainable development outlined in the NPPF applies.

### Other Material Considerations

- 5.45. The application for an amendment to the original Strategic Outline Application (LU/182/15/PL) was approved in October 2018. This included a Development Framework Document which refers to Toddington Lane in the Southern Quarter area, stating that *"This character area provides a transition area between existing development along the Toddington Lane and newly established modern vocabulary of the Local Centre."*

## 6. PROPOSAL

- 6.1. The application is submitted in outline form with all matters, except access, reserved for subsequent determination. It proposes the demolition of existing buildings on site and the erection of 31 dwellings.
- 6.2. Whilst matters of scale, layout, landscaping and appearance are reserved for subsequent determination, the application is supported by a number of proposed indicative drawings, including the Proposed Site Plan (Drawing No. TA 1057 / 10 Rev. A), which details how the proposed 31 units, access road, car parking space, amenity space and landscaping may be delivered on the site.
- 6.3. The frontage building, to be sited over the footprint of Knightscroft, is shown to contain six affordable flats. The building is shown to be two storeys with rooms in the roof space served by dormer windows. The building immediately to the rear of this, facing west onto the access road is shown to comprise four affordable flats. This building is shown to be a two storey building with two flats on each floor.
- 6.4. Beyond this, are the remaining 21 (market) dwellings. These are shown split across a series of terraced rows, orientated in a linearly manner, with east-west ridgelines. The terraced dwellings are shown to be two storey, with some featuring second floors within the roof spaces.
- 6.5. The proposed development would have the following unit mix:

Category	1-Bedroom Units	2-Bedroom Units	3-Bedroom Units	4-Bedroom Units	Total
Affordable Housing	6	4	0	0	10
Market Housing	0	3	12	6	21

- 6.6. The proposed outline scheme includes the provision of private outdoor amenity space for the 21 market dwellings, and communal outdoor amenity space for the 10 affordable (apartment) units.
- 6.7. A total of 61 car parking spaces are shown to be provided within the site, which includes adequate provision for visitor car parking, and disabled car parking spaces.

## 7. PLANNING ASSESSMENT

### Principle Of Development

- 7.1. The application site comprises a former nursery and two dwellings, which will be demolished and redeveloped to provide 31 new dwellings. The site of Westholme Nursery benefitted from outline planning permission for 10 dwellings, but this has since expired. The site of Knightscroft has been developed for the three dwellings within its curtilage. Given the existing uses and previous permissions, and the surrounding strategic residential development, the principle of residential development here is acceptable. Outline application LU/47/11 included a Drawing Number GR.L\_006 (Parameter Plan: Uses), which identifies Westholme Nursery and Anggerik as 'Further

Residential Owned by Others' and the Knightscroft site as 'Land Owned by Others', albeit currently in residential use and surrounded by residential uses on the approved Parameter Plan: Uses, which is included in the list of approved plans at Condition 4 on the Decision Notice of LU/47/11.

- 7.2. The Bovis development parcel of 117 dwellings to the west has a density of around 43 dwellings per hectare and delivered 20% affordable housing. The dwellings in the Bovis parcel are mainly two storeys in height, but with a number of 2 and half and three storey units. The development delivered a mix of 2, 3 and 4 bedroom properties. The Officer Report of the reserved matters application for the Bovis parcel (LU/117/15/RES) refers to this Southern Quarter of the strategic development site being a more urban area of the masterplan where higher density development of a more formal nature has always been accepted. The 'defining principles' of the Southern Quarter are referred to in the Officer's Report as being a regularised pattern of development, focal points at corners, buildings close to the street (2m-6m set backs) and a more modern architectural design. Road widths in this parcel vary between 5m-6m and comprise shared surfaces in block paving with raised tables to reduce vehicle speeds.
- 7.3. The Persimmon parcel of 126 dwellings to the north has a density of around 41 dwellings per hectare and delivered 29% affordable housing. The dwellings in the Persimmon development are mainly two storeys in height and delivered a mix of 2, 3 and 4 bedroom properties, with the affordable units comprising a mix of terraced, semi-detached and flats. The dwellings in this parcel are mainly two and two and a half storey, with some three storey houses.
- 7.4. The strategic development outline approval and reserved matters approvals, along with the permissions for residential development within the site (LU/94/17/OUT and LU/131/16/PL) set the context for the residential development of this site. Although only part of the application site was included in the parameter plans of the original outline planning permission for residential development (Knightscroft was excluded), the July 2018 Proposals Map washes over the whole site as a Committed Strategic Housing Allocation. Therefore, although the site includes land formerly used as a nursery (the loss of which would be resisted by Policy HOR DM1), the precedent set by previous permissions and the inclusion of the land within the Strategic Housing Allocations on the Proposals Map confirm that the residential use of the site is acceptable in principle.
- 7.5. The Neighbourhood Plan has a target of at least 200 dwellings to be delivered in the Plan Period to 2029, on a mix of allocated sites and windfalls. The proposed development provides a contribution to meeting that target.
- 7.6. As confirmed above, the Council are also currently unable to demonstrate a 5 year supply of deliverable housing sites. On this basis, Policy C SP1 is out of date and the tilted balance is engaged.

## Mix Of Units

- 7.7. ALP Policy H DM1 seeks a balanced mix of housing types and sizes in new developments, including the provision of family housing, based on the most up to date Strategic Housing Market Assessment (SHMA) recommendations. The latest information in relation to preferred housing mix for the District is set out in the "Updated Housing Need Evidence" document produced by GL

Hearn, dated September 2016. For market housing, this sets out the following suggested housing mix:

- 1 bedroom - 5-10%
- 2 bedroom - 40-45%
- 3 bedroom - 35 - 40%
- 4+ bedroom - 10- 15%

7.8. This evidence is somewhat out dated now, and whilst a more recent Housing Need Review (dated May 2023) has been produced in support of the Local Plan Update, this does not provide any guidance in relation to housing mix.

7.9. The proposed indicative mix of dwellings shown on the submitted plans provides for the following mix in the size of proposed units :

- 1 & 2 bedroom units - 42%
- 3 & 4 bedroom units - 58%

7.10. The proposed mix reflects the guidance of the Littlehampton NP Policy 3 which seeks to encourage larger family homes in areas beyond a 400 metre walking distance of designated local centres, and would provide a balanced mix of dwelling sizes overall.

### Affordable Housing Statement

7.11. Policy AH SP2 sets out the requirement for all developments to provide 30% affordable units on all sites of 11 residential units or more and to supply written confirmation of the proposed approach to affordable housing.

7.12. The proposed scheme seeks to meet the requirements of Policy AH SP2 by delivering 30% of the dwellings as affordable units. This equates to 10 of the units (rounded up from 9.3).

7.13. The proposed tenure of the affordable homes is indicatively proposed as follows:

- First Homes - 25% of the affordable provision (3 units - rounded up)
- Rent - 67% of the affordable provision (7 units - rounded down)
- Intermediate - 8% of the affordable provision (0 units - rounded down)

7.14. The above tenure mix is in-line with the Council's Interim Affordable Housing Policy Statement. The application is however open to further discussion with the Council's Housing Delivery and Planning Teams during the determination of this application to refine and agree the affordable housing offer associated with this proposal.

- 7.15. Drawing no. TA1057/10 Rev A indicatively shows the location of the proposed affordable homes. As can be seen it is proposed that the one and two bedroom units will form the affordable housing offer towards the front of the site. This keeps the units grouped together for good management.
- 7.16. The Council's most recently published Housing Needs Evidence indicates that there is a need for a greater proportion of smaller (1-2 bedroom) affordable homes. The proposals seeks to deliver these much needed homes in accordance with the requirements of Policy AH SP2 of the Local Plan.

## Design, Form And Appearance

- 7.17. The indicative layout plan indicates a proposed density of around 44 dwellings per hectare. This compares well with the Bovis development of around 43dph, the Persimmon development of around 41dph and the redevelopment of Hollyacre, to the southwest of the site, at around 30dph (LU/116/13). Although the Parameter Plan: Residential Densities submitted with the strategic outline application is not included in the list of approved plans of that decision, Condition 8 of LU/47/11 requires each Reserved Matters application to be accompanied by a Design Statement covering matters, including the density established through the outline parameter plans, indicating that the Council endorsed the density parameters put forward at the outline stage. Drawing Number GR.L\_007 Parameter Plan: Residential Densities shows the current application site split between 'Medium High Density 45-55dph' on the western part of the site and 'Medium Low Density 30-40dph' on the eastern part of the site. As such, the proposed density is considered to be appropriate in this context.
- 7.18. As set out above it is intended that the proposed scheme would consist of a mix of two and two and half storey buildings, arranged as either block of flats or terraced dwellings. The indicative layout has a linear arrangements, reflective of the neighbouring Bovis development and makes good use of the site whilst allowing a comfortable relationship between existing and proposed dwellings.
- 7.19. As an outline application, the detailed design and materials of the scheme are not for consideration at this stage and will be subject to further consideration at Reserved Matters stage. The illustrative elevations and floor plans demonstrate however, how a simple but contemporary design approach would reflect the existing character of the area and comply with Policy D DM1 of the Local Plan.

## Neighbour Amenity

- 7.20. The Bovis development (LU/117/15/RES) to the west of the site includes a road running north-south close to the western edge of the parcel. The dwellings facing the current application site are therefore off-set from the site boundary by a verge, visitor parking lay-bys and the carriageway. Given the degree of separation between these dwellings and the proposed development, there would be no material harm arising to the privacy and amenity of occupiers of these dwellings.
- 7.21. The two plots within the Bovis development which have a closer relationship with the application site are Plots 117 (to the north of the application site) and Plots 23 (to the west of the application site). Both these properties sit at 90 degrees to the application site, with only plot 23 having a side facing windows serving a bathroom at first floor and secondary windows serving a lounge and dining room at ground floor. Given the intervening distances to the site and orientation of these

neighbouring dwellings, it is considered that the resulting relationship with the proposed dwellings will be acceptable.

- 7.22. Whilst only submitted for illustrative purposes, drawing no. TA1057/10 Rev A demonstrates how the site could be developed with 31 units, without harm to the amenity of existing neighbouring properties and thus complies with policy QE SP1 of the Local Plan.

## Access

- 7.23. As permitted, the development of Westholme Nursery would have been accessed via a narrow driveway, restricted at a pinch-point between outbuildings at Dutch Cottages and at Knightscroft. The inclusion of the Knightscroft site in the application site allows for a wider access.
- 7.24. The 10 dwellings permitted by outline application LU/94/17/OUT and the additional 3 dwellings permitted by LU/131/16/PL and the two existing dwellings, a total of 15 dwellings, would have been served by a narrow access. The proposals improve this, providing a wider access road for the proposed dwellings.
- 7.25. Access to this site is from Toddington Lane which, as set out in the Officer's Report of LU/47/11, is intended to become a 'quiet route' mainly for pedestrian and cycle use, with residents access.
- 7.26. Submitted with this application is Transport Statement prepared by GTA Civil and Transport. This confirms that appropriate visibility is available at the proposed access onto Toddington Lane and that the additional vehicle movements associated with the development of this site with 31 dwellings would not have any detrimental impact on the local highway network given the relatively small increase in associated movements.
- 7.27. Adequate space is available within the site for access, turning and an appropriate level of parking. Accordingly there are no unacceptable highway or transport impacts as a result of the proposed development and the proposals have been demonstrated to comply with Policy T SP1 of the Local Plan.

## Ecology

- 7.28. The application site has been subject of a preliminary ecological appraisal to establish the presence or otherwise of any protected species. In addition bat emergence surveys have been carried out after it was determined that one of the existing buildings had "low" suitability for roosting bats.
- 7.29. The PEA and Bat Emergence Surveys confirm there to be no protected species present on the site. Furthermore the site does not fall within or adjacent to any statutory or non-statutory sites. Due to the distance from the closest nearby statutory sites, no direct negative impacts will occur as a result of any development at the application site.
- 7.30. Construction safeguards have been recommended to avoid any impacts from water, dust, noise and light and with these in place the proposed development will have no direct or indirect impact on any priority habitats.

- 7.31. Whilst the proposals will result in a -65.98% biodiversity net loss on habitats units, the applicant proposes to off-set the loss off-site by purchasing biodiversity units. The purchase of 1.75 units off-site will secure an 10% gain of biodiversity units, which will satisfy the statutory requirement introduced by Environment Act 2021.
- 7.32. With the addition of a sensitive lighting scheme to minimise disturbance to foraging and commuting bats; measures to minimise risks to commuting and foraging badgers during construction works; and precautionary measuring to protect any birds using the trees and scrub on site for breeding, there will be no harm to ecology or biodiversity as a result of the development of this site and the proposals accord with policy ENV DM5 of the Local Plan.

## Drainage

- 7.33. The site has been subject to extensive exploratory drainage and flood risk analysis. A Flood Risk Assessment (FRA) was undertaken in 2021 and since that time, ongoing drainage studies have taken place on site. This has included appropriate onsite monitoring and the report by CTP Consulting Engineers; together with the Site Drainage Plans, sets out how the site will accommodate surface water and foul drainage, given the groundwater and geological considerations of the site.
- 7.34. The report confirms that the site falls within Flood Zone 1 and therefore is at the lowest risk of flooding from river or sea flooding. It is therefore appropriate for residential development subject to satisfactory surface and foul water drainage being achievable.
- 7.35. Following the Sustainable Design System (SuDS) hierarchy a surface water drainage strategy is proposed that will see all surface water associated with the proposed development attenuated on site, and discharged at a Greenfield discharge rate. Foul water is to be pumped to the existing sewer on Toddington Lane.

## Whether The Proposals Are Sustainable Development

- 7.36. The NPPF sets out the three strands of sustainable development and that the planning system should seek to achieve gains in all three strands. In respect of this proposal, there are economic, social and environmental gains to be made.
- 7.37. The proposals would provide economic gains through employment during the construction phase and the additional local spending and use of local services and facilities by new residents. Although the development would result in the loss of a site previously used for horticulture, this loss has previously been accepted through the grant of planning permission LU/94/17/OUT and through the inclusion of the site within a residential area on the July 2018 Local Plan Proposals Map. When considering application LU/94/17/OUT it was acknowledged by officers that the site was too small an operation to compete with larger companies, having ceased trading some 13 years previously. As such, the residential use of the site would not result in harm in economic terms.
- 7.38. The proposals would provide social gains by contributing to housing supply, including affordable housing. The mix of units provides for both families and smaller units for down-sizing or young people.

- 7.39. In terms of environmental gains, the proposals represent a more efficient use of land than the existing two dwellings and former horticultural nursery. Ecological mitigation will be incorporated into the new development, including enhancements to facilitate net gains in biodiversity, such as native planting and bird/bat boxes. The proposals will also enhance the appearance of the site and the area, bringing a vacant site back into use.
- 7.40. The proposals therefore achieve economic, social and environmental gains, and can be considered sustainable development.

### Draft Section 106 Heads Of Terms

- 7.41. The Council adopted a CIL charging schedule in 2020. Its purpose is to place a charge on new development to fund infrastructure needed to support growth such as transport, education, health, open space/green infrastructure, police/community safety, and flood defences.
- 7.42. CIL is charged on a “£ per square metre basis”. The application site falls within CIL Zone 2 where residential schemes of 11 or more units are charged £70/m<sup>2</sup> (indexed linked). The final CIL contribution will be calculated at reserved matters stage when the final design and layout of the proposals are confirmed.
- 7.43. Therefore the sole matter needed to be addressed by the Section 106 agreement is:
- Provision of policy compliant Affordable Housing.
- 7.44. As noted above the applicant is open to discussion/negotiation with the Council to refine and agree the detail of the Section 106 requirements.

## 8. CONCLUSION

- 8.1. The proposed development is acceptable in principle. The proposals would deliver economic, social and environmental benefits, and is sustainable development as set out in the NPPF. The proposal complies with the relevant Policies of the Development Plan. The application should therefore be approved without delay, in accordance with Paragraph 14 of the NPPF.