

P E M B R O K E

P L A N N I N G

PLANNING STATEMENT

SITE: 1 BEACH ROAD, LITTLEHAMPTON BN17 5HY

DATE: APRIL 2026

Introduction

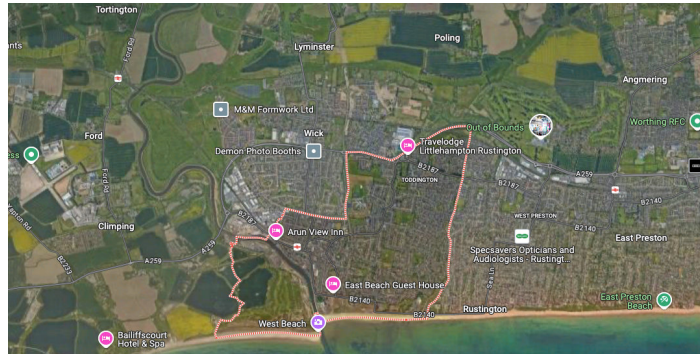
Pembroke Planning has been instructed by Holdhazel Limited, the owners of the above building to prepare a Planning Statement in connection with the above property 1 Beach Road, Littlehampton. This Statement is to accompany a planning application for the change of use and extension of the existing property from Class E to a mixed Class E and Residential Use.

The report is based upon the following documents:

- 2437.E101 Existing Basement Floor Plan;
- 2437.E102 Existing Ground floor Plan;
- 2437.E103 Existing First Floor Plan;
- 2437.E104 Existing Second Floor Plan;
- 2437.E105 Existing Roof Plan;
- 2437.E201 Existing West Elevation;
- 2437.E202 Existing East Elevation;
- 2437.E203 Existing North Elevation;
- 2437.E204 Existing South Elevation;
- 2437.P101A Proposed Basement Floor Plan;
- 2437.P102F Proposed Ground floor Plan;
- 2437.P103D Proposed First Floor Plan;
- 2437.P104D Proposed Second Floor Plan;
- 2437.P105C Proposed Roof Plan;
- 2437.P201B Proposed West Elevation;
- 2437.P202C Proposed East Elevation;
- 2437.P203C Proposed North Elevation;
- 2437.P204C Proposed South Elevation;
- 2437.P301C Proposed Section AA;
- 2437.P302C Proposed Section BB;
- 2437.P303C Proposed Section CC;
- 2437.P304C Proposed Section DD.

Site Description

The property is located in Littlehampton which is situated on the south coast and to the east of Climping and to the west of East Preston.



The property is situated on the corner of Beach Road and High Street with Beach Road running north from the beach and High Street running east – west.



The property is a two storey red brick detached building with a slate tiled pitched roof. Constructed in 1904 the building has been in use as a bank until it was vacated by Lloyds Bank in May 2023.

The entrance is on Beach Road with a stone portico. The internal layout remains as it was when Lloyds Bank occupied the building with rooms on the ground floor and first floor. The property has a small basement underneath the building.

To the rear is an open space which is surrounded by a tall red brick wall. Another entrance into the building is situated to the rear and accessed through the courtyard.



Application Proposals

It is proposed to change the use from Class E 'Bank' to a mixed Class E and Class C3 'Residential' Use.

At ground floor level there would be four commercial units:

- Commercial Unit 1
- Commercial Unit 2
- Commercial Unit 3
- Commercial Unit 4

At first floor level, there would be:

- Flat E would measure 87sqm and be a two bedroomed (4 person) unit;
- Flat F would measure 51sqm and be a one bedroom (2 person) unit;
- Flat G would measure 87sqm and be a three bedroomed (4 person) unit;
- Flat K would measure 45sqm and be a one bedroomed (2 person) unit.

At second floor level, there would be:

- Flat H would measure 58sqm and be a one bedroom (2 person) unit;
- Flat J would be a one bedroom (2 person) unit.

In terms of external alterations, it's proposed to add a two storey extension on the property to the eastern elevation. The only other alterations relate to adding dormers to the roof and roof lights.

Planning History

The planning history for the property has been set out below. As can be seen, the majority of the applications relate to advertisement consent together with applications relating to the buildings use as a bank.

LU/86/53 Internal alterations
Planning Approved 09.10.53

LU/80/541 Conversion of portion of g/f to shop
Planning Approved 09.07.54

LU/121/53 Outline application conversion of portion of premises into shop and offices
Planning Approved 08.01.54

LU/19/56 Shop front
Planning Approved 09.03.56

LU/97/57/ADV Painted metal directional sign
Planning Refuse 10.05.57

LU/93/70/ADV Erection of two illuminated fascia signs
Planning Approved 18.05.70

LU/92/76 Ground floor rear extension
Planning Approved 07.04.76

LU/134/77/ADV One double sided internally illuminated projecting sign
Planning Approved 26.04.77

LU/64/77/ADV One illuminated projecting box sign
Planning Refused 22.03.77

LU/63/79 Change of use of second floor of premises from office to secretarial & typing training
Planning Approved 14.03.79

LU/150/81/ADV Logo panel forming part of fascia to in the wall cash dispenser
Planning Approved 01.04.81

ADVLU/151/81 Alterations to existing window and wall on High Street elevation to incorporate in
Planning Approved 01.04.81

LU/37/87 Change of use from Hairdressers shop (Class I Retail) to Class 2 Office
Planning Plan Application Approved 17.03.87

LU/336/89 To form a car park in existing garden area and new access to Beach Road
Planning Application Withdrawn. 14.09.89

LU/241/91 Installation of NCR External Cash Dispenser together with removal of existing machine and making good
Planning Application Approved 30.09.91

LU/290/91/A 1 No. internally illuminated fascia sign to cash dispenser.
Planning Advertisement Approved 18.11.92

LU/257/93/A 1 no. internally illuminated fascia sign.
Planning Advertisement Approved 01.11.93

LU/79/96 Installation of a satellite receiving dish
Planning Application Approved 03.05.96

LU/244/98/A Halo illuminated lettering and internally illuminated projecting signs.
Planning Advertisement Approved 24.11.98

LU/93/03/A 1no. internally illuminated ATM box sign and 1no. internally illuminated projecting sign.
Planning Advertisement Approved 09.05.03

LU/350/03/ Entrance steps removed and front door extended down to achieve level access into the building

Planning Application Approved 17.10.03

LU/407/06/A New bank signage - illuminated and non-illuminated.

Planning Advertisement Approved 24.01.07

LU/106/10/A Replace existing window displays with A1 window poster display units with illumination located behind shop front glazing. Replace existing ATM Tablet over ATM Machine.

Planning Advertisement Approved 07.06.10

LU/369/10/A Internally illuminated A1 window poster display units located behind shop front glazing

Planning Advertisement Approved 15.02.11

LU/67/13/A 1 no. Internally illuminated heritage suspended square hanging sign, 2no. internally illuminated fascia signs, 2no internally illuminated projecting sign, 1no. internally illuminated ATM header, 2no. non illuminated nameplates & 3 no. non illuminated reverse applied vinyls

Planning Advertisement Approved 30.04.13

Withdrawn Planning Application LU/168/25/PL

Planning Application LU/168/25/PL was submitted on 14 August 2025 but withdrawn by the applicant on 19 January 2026 following comments received from the Environment Agency.

The scheme was registered as:

Change the use from Class E to a mixed Class E and Residential Use (C3) to include 2 No. residential units and 2 No. commercial units at ground floor level, 4 No. residential units at first floor level, 2 No. residential units at second floor level, alterations to include a first floor extension to the eastern elevation, four dormers and two roof lights. This application may affect the setting of listed buildings and is in CIL Zone 4 (Zero Rated) as flats and other development.

A number of Parties were consulted on the planning application.

Ecology & Biodiversity Net Gain

The Council's Ecology Officer reviewed the planning application and confirmed that there would be a 67% increase in habitat units (exceeding the mandatory 10%). As such the application was supported by the Ecology Officer.

Environmental Health

Environmental Health were consulted regarding the potential impact on noise. They considered the scheme to be acceptable subject to the provision of two planning conditions relating to details of sound insulation between the commercial and residential units and external noise sources.

Arun Conservation Area Advisory Panel

The ACAAP had no objection to the planning application. The Panel welcomed the proposed uses which they noted were appropriate for the town centre location. The Panel considered that the building is of such importance that precise details of all new joinery, together with external wall and roof materials, should be agreed with the Council. The bonding to all new external brickwork should also match that on the host building.

Conservation Officer

The Principal Conservation Officer had no objection commenting that the application is considered to not cause harm to the significance of the heritage assets. As a consequence, it should be determined in accordance with the relevant policies within the Development Plan, along with these comments.

Littlehampton Town Council

The Town Council's Planning and Transportation Committee reviewed the application at their meeting on 8 September and supported the planning application.

The Private Sector Housing and Public Health Team

The Private Sector Housing and Public Health Team had no objection to the planning application as long as their comments were adhered to.

Economic Development Projects Officer

The Economic Development Officer supported the application noting that they were pleased to see two commercial units incorporated in the scheme, located on the ground floor. They noted that this relates to RET SP1, RET DM1 and EMP SP1 policies within the local plan.

Surface Water Drainage

The Drainage Engineer was consulted and objected to the planning application.

Environment Agency

The EA objected to the planning application as an acceptable FRA was not provided with the application and the proposals posed an unacceptable risk to life.

In light of the comments received by the Environment Agency, the planning application was withdrawn to consider how the proposal could meet the required standards.

National Planning Policy

The Government published the National Planning Policy Framework (NPPF) in 2012 and updated in Dec 2024, replacing the series of Planning Policy Guidance Notes and Planning Policy Statements. The NPPF is a material consideration in planning decisions, as it sets out the Government's planning policy guidance for England and how this is expected to be applied.

Presumption in Favour of Sustainable Development

The revised NPPF continues to set out a presumption in favour of sustainable development; it identifies three facets of sustainable development: economic, social and environmental, noting that they are interdependent and need to be pursued mutually. It sets out for decision taking, the presumption in favour of sustainable development means approving development proposals that accord with the development plan, and where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF.

Decision-Making

Local planning authorities should approach decision on proposed development in a positive and creative way. They should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

It is further stated that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.

Delivering a Sufficient Supply of Homes

The NPPF states that 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.

Achieving Well-Designed Places

The NPPF outlines that the Government places great importance on design, which is a key aspect of sustainable development. It notes that planning policies and decisions should ensure that developments:

- will function well and add to the overall quality of the area;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, while not preventing or discouraging appropriate innovation or changes (such as increased densities);
- establish or maintain a strong sense of place;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and
- create places that are safe, inclusive and accessible.

National Planning Practice Guidance (NPPG)

In March 2014, the Government published the Planning Practice Guidance website. The NPPG provides further context to the NPPF and the sections outlined above. It should be read alongside the NPPF and is a material consideration in the determination of this application.

The Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the Arun comprises the following documents:

- Arun Local Plan 2011 – 2031 (July 2018);
- Littlehampton Neighbourhood Plan.

Policy and guidance which forms a material consideration, including the National Planning Policy Framework (NPPF) have also been considered.

The building has been identified as being:

- A Building of Special Interest;
- Within an Economic Growth Area;
- Within a Secondary Retail Frontage.

Planning Assessment

Principle of Development

Policy SD SP2 Built-up Area Boundary states that development should be focused within the Built-Up Boundaries and will be permitted, subject to consideration against other policies in this Local Plan.

Existing Use

Policy EMP DM1 Employment Land: Development Management

The Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy.

Existing employment sites and premises will be protected where there remains a reasonable prospect of employment use. Excepting Permitted Development Rights or Local / Neighbourhood Development Orders, 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 by the District Council at pre-application advice stage;

The Council will require evidence that the site has not been made deliberately unviable, that marketing has been actively conducted for a reasonable period of time and that alternative employment uses have been fully explored.

As noted above, the property was vacated by Lloyds in May 2023. Justice & Co Commercial Limited prepared a letter dated 8 May 2025 regarding the property.

This letter notes that they know the property well and that it extends to 6,877sq.ft over four floors and from their detailed knowledge of Littlehampton. In preparing their letter report they outline the properties which are currently vacant (which there are six vacant units).

They go on to note that given the current vacancies, they can't see continued use of this building as commercial, the façade does not lend itself to modern day retailers and office occupiers do not want anything larger than 1,000sq.ft. The works required to the building to bring it up to the required standard would take in excess of 20 years to re-coup making this an unattractive proposition.

The above demonstrates that the site is no longer required (given the existing vacant units within Littlehampton) and the necessary spend to bring the property up to a standard suitable to a modern day occupier (notwithstanding the issues in terms of limited ground floor display windows) means that it would not be a viable proposition for any potential occupier. This would therefore mean in policy terms that Policy EMP DM1 that there is not a reasonable prospect of the employment use continuing within the building.

Housing

The Strategic Objective of the Local Plan as set out in Chapter 12 states that the objective is to plan and deliver a range of housing mix and types in locations with good access to employment, services and facilities to meet the District's housing requirements and the needs of Arun's residents and communities both urban and rural, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed while supporting the creation of integrated communities."

"Promote strong, well integrated and cohesive communities, through the promotion of healthy lifestyles, provision of good quality accessible community facilities and a safe environment, which delivers an enhanced quality of life to all. This includes meeting the needs of a growing elderly population."

Policy H SP1 The Housing Requirement states that within the plan period 2011-2031 at least 20,000 new homes will be accommodated in the District. The policy goes on to identify a number of strategic sites.

The Strategy for housing development is to distribute housing across the district at sustainable locations; it shall be focused on the two main towns and their associated hinterlands in order to support their role as the two main service, employment, retail and social centres. Development at the West Bank in Littlehampton will take place alongside significant regeneration plans for the town. Development in Strategic Allocations will build upon, and link into, existing infrastructure, where required. Sustainable growth of the villages will take place in a number of inland villages in order to develop their roles as well-connected sustainable villages serving inland Arun; providing an enhanced range of shops, employment, housing, community facilities and local services, supported by improved transport links.

Policy 1: The Presumption in Favour of Sustainable Development of the Neighbourhood Plan states that Littlehampton Town Council will take a positive approach to its consideration of development. The Town Council and the local planning authorities will seek to work with applicants and other stakeholders to encourage the formulation of development proposals that can be approved.

Policy 2: A Spatial Plan for the Town of the Neighbourhood Plan 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 1Community Hub and ‘the Green’, as shown on the Key Diagram.

Housing is directed to urban locations and town centre locations which are the most sustainable locations for new housing. This property is located within a town centre location and therefore, would accord with the above policies as being a sustainable location.

Housing Mix

Policy H DM1 Housing Mix states that the Council will seek a mix of dwelling types and sizes, to include affordable housing units, that adhere to the latest Homes and Communities Agency (37) design guidance. For developments of 11 units or more the Council shall require a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations.

The tenure mix for development schemes shall be negotiated on a case by case basis taking any necessary viability considerations into account. Developers shall have regard to the most up to date version of the SHMA.

The mix of units proposed is set out below but in summary the scheme proposes a mixture of one, two and three bed units of varying sizes and accommodating between 1 – 4 persons.

As the proposal is for six new residential units then the requirement for a balanced mix are not applicable. The town centre location has been taken into account for this scheme and it is considered that two bedrooomed units are most appropriate for this site.

Flood Risk

Ark Environmental have prepared a Flood Risk Assessment. The Assessment notes that the site is an existing building and that the change of use is specific to the site hence the sequential test does not apply. The Assessment goes onto note that:

- The site is in the Local Plan designated and supported Littlehampton Economic Growth Area (LEGA) allocated for residential
- It is considered in principle the sequential test is established as passed
- Sequentially, the site is at the furthest extent of the extreme floodplain
- There are no ground floor habitable uses proposed
- There are sites to the south and west that are in higher flood risk
- There are many sites within the LEGA that are in higher flood risk
- There are potentially sites with existing buildings in the LEGA that are in lower flood risk, but, the point of the LEGA is to optimise residential dwellings in this central area of Littlehampton
- A analysis of every single property in a lower flood risk within the LEGA is not appropriate for the sequential test for an area designated for flood risk because it does not make sense to do so as the conclusion is already known, but it does not inform the suitability of this “plot” within the LEGA as being
- sequentially preferable (this is a grey area of the sequential test approach)

The correct approach is to consider the site and scheme specifics in the Exception Test approach:

- This assessment is itself the key 2nd part of the Exception Test
- The scheme is considered to pass the Exception Test by this report for the reasons cited in the

- assessment, that the scheme has site and scheme specifics that make it appropriate for the designation
- the use is as residential
- No ground floor habitable uses
- The EA stated their design flood level for extreme events including future climate change would be: 4.93mAOD
- The lowest habitable is at 6.55mAOD and will be 1.62m higher than the worse case undefended and defended flood extents.

The FRA concludes that the scheme will result in a better flood protected and lifetime flood future-proofed property than existing with SUDS betterment.

Locally Listed Buildings

Policy HER DM2 Locally Listed Buildings states that applications will only be granted for development which results in the loss of existing Locally Listed Buildings or Structures of Character when it can be demonstrated that the building or structure cannot be put to a beneficial use or re-use. Replacement structures will need to be of a high quality design. There may be circumstances where the public benefit from the proposed development outweighs any proposed harm, in such circumstances, the proposal will need to be justified as appropriate.

MVHC Ltd have prepared a Heritage Statement to accompany the planning application and note that the building is an early 20th century purpose-built building constructed for the Capital and Counties Bank. It is not statutory listed, nor is it in the conservation area, but it is locally listed and is in the vicinity of multiple statutory listed buildings and other locally listed ones. Its significance is mainly attributed to its historic interest and has moderate architectural/artistic interest.

The MVHC report notes that the proposed alterations to the existing building in order to provide new residential accommodation and find the optimum viable use for this vacant property. The conclusions reached are that there would be no harm to the significance of the listed buildings or locally listed buildings and that the overall impact will be minor and the heritage values will be preserved.

Historic England "Conservation Principles" and the NPPF define conservation as "managing change." NPPF recognizes that change and adaptation must occur if historic buildings are to survive at all. This can be achieved only with considerable investment in the repair, maintenance, and enhancement of properties, as would be the case. In this way, it is considered that the proposals will comply with the National and Local policies and guidance for the historic built environment.

Summary and Conclusions

The accompanying proposals relate to the change of use and extension to 1 Beach Road, Littlehampton.

The proposals would bring a vacant locally listed building back into use and assist in delivering six new residential units to the District as well as commercial units.

The proposals have been designed to respect the historic building with only minimal works proposed through the extension of the rear façade and dormer windows within the roof.

Once completed, the original building could still be read. The proposed works would respect the design and proportions of the building.