

Recommendation Report for Planning Permission

REF NO: LU/137/26/PL

LOCATION: 1 Beach Road
Littlehampton
BN17 5HY

PROPOSAL: Change the use from Class E to a mixed Class E and C3 Residential Use consisting of 4 No. commercial units at ground floor level, No. 4 residential units at first floor level, No. 2 residential units at second floor level and proposed external alterations including a first floor extension to the eastern elevation, 4 No. dormers and 2 No. roof lights (resubmission following LU/168/25/PL). This application is in CIL Zone 4 (Zero Rated) as flats.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	Change the use of the building from Class E to a mixed use of Class E and C3. This will include 4 commercial units to the ground floor with 6 No. flats to the first and second floor which consist of 4 x 1 bed, 1 x 2 bed and 1 x 3 bed units. There will be four dormers constructed and a first floor extension.
TREES	None on site.
BOUNDARY TREATMENT	The site has a 1.8m brick wall along the boundary to the west of the site and to the rear separating the site from the car park to the east. The frontage of the building adjoins the highway to the west and north.
SITE CHARACTERISTICS	The property is a detached two storey property constructed in 1904. It is an attractive property with red brick and a slate tiled pitched roof. It is on a corner fronting the High Street and Beach Road.
CHARACTER OF LOCALITY	The area is mixed in use, predominately consisting of commercial units to the ground floor with residential above.

RELEVANT SITE HISTORY

LU/168/25/PL	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.	Withdrawn 19-01-26
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LU/168/25/PL was withdrawn in January 2026 due to objections from the Environment Agency.

REPRESENTATIONS

Littlehampton Town Council provided an objection

- Flat K is below space standards.
- Support is maintained for retention of the commercial units.

This was amended to no objection on 3/8/26 following a revised planning statement which confirmed Flat K was intended for a single occupier and would comply with space standards.

No representations from nearby occupiers have been received.

COMMENTS ON REPRESENTATIONS RECEIVED:

Noted.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

WSCC Highways - No objection. Request a condition relating to cycle storage.

Conservation Officer - The application is not considered to cause harm to the significance of heritage assets. Request a condition relating to window and doors.

Environmental Health - No objection subject to conditions for noise relating to the road and commercial units below.

ADC Drainage Engineers - No objection as the drained area and footprint are unchanged.

Environment Agency - No objection subject to a condition to ensure no residential units to the ground floor.

Economic Regeneration - Support, pleased to see commercial units for use on the whole ground floor.

Historic England - Do not consider it necessary to be notified.

ADC Ecology - No objection subject to conditions for swift bricks.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted.

POLICY CONTEXT

Built up area boundary
Flood Zone 2 and 3
Article 4
Economic Growth Area

Archaeological Notification Area
 Town Centre Retail Boundary
 Locally Listed Structure
 Surface Water 1 in 1000
 Prone to Groundwater Flooding >75%

DEVELOPMENT PLAN POLICIES

Arun Local Plan 2011 - 2031:

DDM1	D DM1 Aspects of form and design quality
DDM2	D DM2 Internal space standards
DDM4	D DM4 Extensions and alter to exist builds (res and non-res)
DSP1	D SP1 Design
ENVDM5	ENV DM5 Development and biodiversity
HERDM2	HER DM2 Locally Listed Buildings or Structures of Character
HERSP1	HER SP1 The Historic Environment
SDSP2	SD SP2 Built-up Area Boundary
TSP1	T SP1 Transport and Development

Littlehampton Neighbourhood Plan 2014 Policy 1 The Presumption in Favour of Sustainable Development

Littlehampton Neighbourhood Plan 2014 Policy 17 Buildings and Structures of Character

Littlehampton Neighbourhood Plan 2014 Policy 2 A Spatial Plan for the Town

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

SPD11	Arun Parking Standards 2020
SPD13	Arun District Design Guide (SPD) January 2021

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is considered to comply with relevant Development Plan policies in that the proposal would not result in adverse harm upon the character of the area, or upon amenity, highways, flood risk, ecology or heritage assets.

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that

(2) in dealing with an application for planning permission the authority shall have regard to -

(a) the provisions of the development plan, so far as material to the application,

(aza) a post examination draft neighbourhood development plan, so far as material to the application,

(b) any local finance considerations, so far as material to the application, and

(c) any other material considerations.

OTHER MATERIAL CONSIDERATIONS

There are no other material considerations to be weighed in the balance with the Development Plan.

BIODIVERSITY NET GAIN

This application is liable for Biodiversity Net Gain (BNG)

- 147.72% in biodiversity.

CONCLUSIONS

PRINCIPLE

The site is in the Built-Up Area Boundary where the principle of development is supported subject to consideration against other relevant Development Plan Policies in line with policy SD SP2 of the Arun Local Plan (ALP), and policies 1 & 2 of the Littlehampton Neighbourhood Development Plan (LNP).

LOSS OF EMPLOYMENT

ALP policy EMP DM1 seeks to protect employment sites. It states permission will not be granted unless it has been demonstrated the site is not required, unviable and marketing has taken place to support this.

The property dates back to the early 1900's and was constructed to provide accommodation for the town's main bank and was used until 2023. The building has been empty since this use terminated.

The applicant has provided correspondence from local agents which confirms that due to the size of the building which is over 6000sqft and due to the number of vacant properties in the high street, its use as a commercial unit is no longer viable. Due to the age of the building, its size and subsequent layout, over three floors, combined with no allocated parking it does not lend itself to a modern day retailer.

The whole of the ground floor will be retained as commercial, forming 4 smaller units and is a positive.

Economic Regeneration support the application and are pleased to see commercial units retained to the ground floor.

The proposal maintains some commercial use on site and complies with ALP policy EMP DM1.

DESIGN AND VISUAL AMENITY

ALP policies D SP1 and D DM1 require development to make the best possible use of land by reflecting or improving on the character of the site/surrounding area.

The property is a detached two storey property constructed in 1904. It is an attractive property with red brick and a slate tiled pitched roof.

The vacant building was used as a bank at ground and first floor level. The application proposes to change the use to 6 No. self contained flats and 4 No. commercial units to the ground floor. A first floor extension is proposed alongside the addition of four dormers and two rooflights.

The property is in a prominent position to the end of Littlehampton High Street and is visible from all elevations. The High Street and Beach Road run along its northern and western elevation. To the southern side, there are a terrace of shops and to the east, the site adjoins a car park.

To the ground floor, the main entrance to the property to the west would be retained serving the commercial unit 3 and existing doors to the north would serve unit 1 and 2. An existing entrance to the south would serve commercial unit 4 and this would also be used to access for Flats E, F and J. Flats G, K and H will be accessed by an existing access from the north.

An extension is proposed which would be at first floor, above existing flat roof and is located to the east and southern elevation. The site adjoins Manor House Car Park and the addition would be visible from this elevation and from Beach Road. The extension will have a flat roof and will feature brick to match the host dwelling. The extension appears appropriate in size and design and will blend in with the host building. Windows will be sash timber to match those already in existence.

Four dormers are also proposed. These appear appropriate in scale and will match the design and size of existing dormers. These are located to the north and south and the proposed would result in three dormers to each the north and southern roof slope.

The Arun Design Guide (ADG) states development should 'avoids insensitive extensions and alterations which deviate from the general scale and massing of the surrounding area' and 'Respond to the existing scale and massing of the surrounding built environment, emulating this scale in the majority of cases'. The proposal complies with the guidance. The extensions are in keeping with the property.

The extensions and alterations proposed to the building to enable the change of use would appear acceptable in compliance with ALP policies D DM1 and D SP1 and the ADG.

RESIDENTIAL AMENITY

The building is in an area which is mixed in use with both residential and commercial uses present nearby. The change of use to form a residential building would not be out of character with the area and is not considered to result in a significant increase in noise through comings and goings which would result in harm upon neighbouring amenity.

Whilst the extension adds some bulk, as a result of its position it would not result in overbearing or overshadowing upon neighbouring occupiers to the south at 1-2 Norfolk House.

There will be two additional windows at first floor to the north serving a bathroom and wardrobe. There will also be an additional door at ground floor and two windows at first floor serving Flat K facing south.

These windows are likely to result in some additional views due to their siting. However, this is unlikely to be significant due to the angle of the windows and due to the location of the neighbouring windows, which are set back into the property with an enclosing wall. To the north, there would be sufficient separation to neighbouring buildings that any views would be similar to that of which existing north facing windows currently achieve.

The dormers to the north and south would again not result in adverse views, positioned to overlook the street scene. They are also modest in size, similar to existing and will not result in adverse overbearing.

The proposal would not result in adverse overbearing, overshadowing or overlooking upon occupiers and complies with relevant policy.

SPACE STANDARDS

National guidance advises the following minimum Gross Internal Area (GIA) standards apply.

The proposal consists of 6 flats, 4 at first floor and 2 at second floor. All one bed units would have an internal floor space of between 36-51sqm, the two and three bed units are 87sqm. The one bed unit that is 36sqm is 1sqm below the requirements, however the overall size of the flat is larger at 101sqm with 36sqm relating to the area that has a head height of over 2m. The space standards are guidance only and the size of the units are acceptable.

With regards to outdoor space, the Arun Local Plan has no size standards in respect of private gardens but would instead take a view at the time of an application as to the quality & quantity of proposed private amenity space. The Arun Design Guide states 'communal residential spaces should be safe, usable, designed to a high standard and well managed; 'amenity spaces should be of an appropriate size and shape to be usable and enjoyable'. It further states 'residential communal shared spaces should be a minimum of 40sqm plus 10sqm for each unit'. The proposal does not provide any private space for individual units although the site does have a garden for communal use to the southern elevation with an area of approximately 200 sqm. This is a reasonable size and would be acceptable provision.

The site is in close proximity to area of open space at Caffyns Field which is 250m to south and the beach is a further 200m walk.

Whilst the building does not provide private amenity space for residents, there is acceptable communal provision on site and in the surrounding vicinity, in accordance with ALP policy D DM2 and the ADG.

DRAINAGE AND FLOOD RISK

ALP policy W DM2 seeks to limit development in areas at risk of flooding.

The site is in Flood Zone 2 and 3 and is at risk of climate change 2031. It is also at risk of surface water flooding and groundwater flooding.

A sequential test is not required developments that are a change of use, however this application does include an extension which would trigger the need for a sequential test. However, the NPPG has recently been updated and para 27a states ' a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing properties (relative to their existing size), where it may be impractical to accommodate additional space in an alternative location. Equally where there are large areas of Flood Zone 2 and 3 and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives'.

In this case the extension proposed at first floor is 65 sqm. This is relatively small compared to the existing building at 330sqm. With regards to para 27a, it would be impractical to locate a small extension of this size elsewhere. The site is also within the Littlehampton Economic Growth Area (LEGA) which seeks to focus development within this area and most of the parish is within Flood Zone 2 and 3. When taking a pragmatic approach, in this case due to the small area of additional footprint proposed, a sequential test is not necessary.

The Environment Agency have no objection, owing to the fact that there are no residential units proposed

to the ground floor. With regards to the commercial units, they will have flood resilient measures incorporated such as having electrics/wall sockets at high level.

The application is acceptable with regards to flood risk.

ALP policy W DM3 states all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SuDS) as appropriate to the size of development.

ADC Drainage Engineers have no objection. There is an extension, as this is at first floor and the footprint will not alter, the change of use would not affect drainage on or off site.

The proposal would not result in an increase in flood risk and the development would be safe in compliance with ALP policy W DM2 and W DM3.

PARKING/HIGHWAYS

ALP policy T SP1 seeks to ensure development provides safe access on to the highway network; contributes to highway improvements (where appropriate) and promotes sustainable transport.

ADC Parking Standards require that 1 and 2 bed properties in this location (Parking Zone 4) provide 1 parking space per dwelling. The development would require 6 parking spaces be delivered. The commercial unit would also attract a requirement of 1 space per 14sqm of commercial space. Four units would require 21 car parking spaces in total. No parking spaces are provided to serve the development.

Whilst no parking is provided, the proposal is in a highly sustainable transport location and there are a number of public transport connections within the area that would reduce the dependency on private vehicles, with the property around a 5-10 minute walk from the railway station. The roads directly outside the property have parking restrictions although there is a car park to the rear of the site for longer visits although this is subject to pay and display. There are some areas of roadside parking within walking distance which are not subject to parking restrictions, but these are around 250m from the site and they can't be viewed from the site. Whilst the development does not provide private parking, given the highly sustainable location of the dwellings and the alternative options available for parking in the area, it is likely vehicles could be accommodated within the wider area.

WSCC Highways have no objection and have requested a condition be applied for cycle storage.

Whilst the parking provision is insufficient and does not comply with Arun Parking Standards, given the highly sustainable location of the proposal in transport terms, it would not result in adverse upon upon the highway and is in this case, acceptable.

BIODIVERSITY

ALP policy ENV DM5 requires that proposals achieve a net gain in biodiversity and protect existing habitats on site.

The site is largely hardstanding with a small garden to the southern elevation, consisting of mixed shrub. Post development, the site will include areas of communal vegetated garden with scattered trees. All landscaping will be native species only. The site will have a net gain of 147.72%. This is largely due to the inclusion of two trees.

Two integrated swift bricks will provide nesting habitats for birds. These should be on a north or east elevation, where they will be sheltered from prevailing wind, rain and strong sunlight. These will be conditioned.

ADC Ecologist has no objection.

The proposal delivers a net gain in biodiversity and accord with ALP policy ENV DM5 and the NPPF.

HERITAGE ASSETS

ALP policy HER DM1 relates to listed buildings and policy HER DM3 relates to protection on the conservation areas. Policy HER DM2 seeks to protect building/structures of character. The policy states 'proposals for the alteration or extension of buildings on the local list will be expected to relate sensitively to the building or structure and its setting and respect its architectural, landscape or historic interest. The Local Planning Authority will seek to preserve features of such buildings which contribute to that interest'.

Para. 207 of the NPPF requires applicants to describe the significance of heritage assets affected, including any contribution made by their setting.

Para 208 requires Local Planning Authorities (LPAs) to identify and assess the particular significance of the heritage asset that is affected by a proposal. The LPA must then consider the level of harm associated with the proposal and decide whether there is no harm.

Policy 17 of the LNDP refers to buildings/structures of character.

The property is locally listed and in close proximity to the East Street Conservation Area and several designated and other locally listed heritage assets. The building occupies a prominent location and retains an associative historic interest both individually as part of the wider historic townscape and holds significant derived from the architectural detailing and its contribution to the late Victorian commercial development of the area.

External alterations include a first floor extension to the eastern elevation, the addition of four dormer windows, and two rooflights. The concept of extending the building is acceptable, especially where it has the potential to improve the northern elevation which includes the secondary shop front. The proposed design attempts to reflect that of the host building. The introduction of dormer windows is acceptable in principle, and it is positive to see references to the fact that they will accurately reflect the existing dormer and windows will be traditional vertical white timber to match existing.

While the extension may be partially visible from the designated heritage assets, this visibility would not result in harm to their significance as a consequence of development within their setting. Views between the Manor House and St Mary's Church are limited due to intervening trees and boundary walls.

The application is not considered to cause harm to the significance of the heritage assets and as such, it accords with relevant policies.

SUMMARY

The development falls within the BUAB where the principle of development is acceptable subject to compliance with relevant policies.

Paragraph 11(c) of the NPPF states that development proposals that accord with an up-to-date development plan should be approved without delay. The provision of 6 residential units gains limited weight in favour of the proposal given the context of the lack of a five year housing land supply. The proposal is policy compliant.

As such, the development is recommended for approval subject to the following conditions.

HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

CIL DETAILS

The application is not CIL liable being classed as other development.

RECOMMENDATION

APPROVE CONDITIONALLY

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be carried out in accordance with the following approved plans:

- Location Plan
- Site Plan
- Proposed Basement Floor Plan P101 B
- Proposed Ground Floor Plan - P102 F
- Proposed First Floor Plan - P103 D
- Proposed Second Floor Plan - P104 D
- Proposed Roof Plan - P105 C
- Proposed West Elevation - P201B
- Proposed East Elevation - P202 C

- Proposed North Elevation - P203C
- Proposed Section AA - P301 C
- Proposed Section BB - P302 C
- Proposed Section CC - P303 C
- Proposed Section DD - P304 C
- Proposed South Elevation - P204 C

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Arun Local Plan policies D DM1 and D SP1.

- 3 No part of the development shall be first occupied until covered and secure cycle parking spaces have been provided in accordance with plans and details to be submitted to and approved by the Local Planning Authority. The approved spaces shall be maintained in perpetuity.

Reason: To provide alternative travel options to the use of the car in accordance with Arun Local Plan policy T SP1 and the NPPF.

- 4 Prior to the occupation of the development, a scheme for protecting the proposed dwellings from noise shall be submitted to and approved in writing by the Local Planning Authority. The proposed scheme shall achieve the following noise levels, based on Table 4 of BS 8233:2014:

1. internal day time (07.00 hours to 23.00 hours) noise levels shall not exceed 35dB LAeq, 16hr for habitable rooms (bedrooms and living rooms with windows open)

2. internal night-time (23.00 hours to 07.00 hours) noise levels shall not exceed 30dB LAeq, with individual noise events not exceeding 45dB L_{max} no more than 12 times per night (bedrooms windows open).

3. garden/external amenity spaces should not exceed 50 dB LAeq, 16hr.

If it is predicted that the internal noise levels specified above will not be met with windows open, the proposed mitigation scheme shall assume windows would be kept closed and will specify an alternative ventilation system, to reduce the need for windows to be opened. As a minimum, this should usually consist of a mechanical heat recovery ventilation system with cool air by-pass or equivalent.

The applicant should review the Planning Noise Advice Document - Sussex, November 2023: <https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n19846.pdf&ver=24686>.

The agreed noise mitigation measures shall be fully installed/implemented prior to occupation of any of the affected dwellings and permanently retained in good working order.

Reason: To protect the amenity of local residents in accordance with Arun Local Plan policy QE DM1. This must be a pre-commencement condition because it is necessary to have such mitigation measures in place before the buildings are occupied.

- 5 Prior to occupation, a Biodiversity Enhancement Layout, providing the finalised details and locations of the enhancement measures contained within the 'Biodiversity Net Gain Assessment, July 2026 Rev C' shall be submitted to and approved in writing by the Local Planning Authority.

The enhancement measures shall be implemented in accordance with the approved details

prior to first occupation of any part of the development and all features shall be retained in that manner thereafter.

Reason: To enhance protected and priority species and habitats in accordance with Arun Local Plan policies ENV SP1 and ENV DM5 and allow the Local Planning Authority to discharge its duties under the NPPF and s40 of the Natural Environment and Rural Communities Act 2006 (Priority habitats and species).

- 6 Prior to their insertion details of the windows and doors including their design/appearance (including elevation), specification, glazing bars, glazing (system), method of opening, decorative/protective finish (i.e. stain/paint and colour) and location within the reveal, in the form of drawings and sections of an appropriate scale, shall be submitted to and agreed in writing by the Local Planning Authority before the windows and doors are installed.

Reason: To enable the Local Planning Authority to control the development in detail by endeavouring to achieve a building of visual quality in accordance with Arun Local Plan policy HER SP1 and HER DM2 and the NPPF.

- 7 The development shall be carried out in accordance with the submitted flood risk assessment (dated April 2026) and the following mitigation measures it details:

- That there are no residential units constructed on the ground floor.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: To reduce the risk of flooding to the proposed development and future occupants in compliance with Arun Local Plan policy W DM2 and the NPPF.

- 8 The materials and finishes of the external walls of the building hereby permitted shall match in colour and texture those of the existing building.

Reason: In the interests of amenity in accordance with Arun Local Plan policies D DM1 and D SP1.

- 9 The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition (the biodiversity gain condition) that development may not begin unless:

1. A Biodiversity Gain Plan has been submitted to the planning authority, and
2. The planning authority has approved the plan.

This permission will require the submission and approval of a Biodiversity Gain Plan before development is begun.

For guidance on the contents of the Biodiversity Gain Plan that must be submitted and agreed by the Council prior to the commencement of the consented development please see the link: <https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan>

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as amended).

- 10 Notwithstanding the provisions of any Town and Country Planning General Development Order or Use Classes Order (or any Order revoking or enacting that Order), the ground floor commercial units hereby permitted shall be restricted to Class E only.

Reason: To enable the Local Planning Authority to consider the acceptability of alternative use, in accordance with Arun Local Plan policy D DM1.

- 11 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the NPPF.