

REF: P1354

PLANNING STATEMENT

Location: 57 River Road, Littlehampton, BN17 5DD

Applicant: Brownfield Estates

Date: February 2025



QUALITY ASSURANCE

Status	Issue	Date	Prepared By	Checked By
FINAL	1	Feb 25	AR	PB

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Planning Insight Limited.

CONTENTS

1.0	INTRODUCTION	4
2.0	PLANNING CONTEXT	6
3.0	PLANNING POLICY	9
4.0	PLANNING ASSESSMENT	12
5.0	PLANNING BALANCE & CONCLUSION	23
APPENDIX A. CENSUS DATA		25

1.0 INTRODUCTION

Overview

- 1.1 This Planning Statement has been prepared by Planning Insight on behalf of Brownfield Estates ('the Applicant') to accompany a planning application to Arun District Council in respect of the proposed development at 57 River Road Littlehampton BN17 5DD (the 'Application Site'). The description of the development is as follows:

"Construction of flats with associated car parking and landscaping as well as partial demolition of the boundary wall, pedestrian access & floating pontoon with residential mooring."

- 1.2 This planning application follows various permissions on the site, which have established residential use. The applicant seeks to optimise the design proposal to bring the site forward through this planning application. The objective of this application is to provide a thoroughly considered, sensitive scheme that successfully delivers residential use on the site.

The Proposal

- 1.3 Planning permission is sought for the redevelopment of the site, whilst retaining the front façade of the existing warehouse structure to provide 9 residential units. The site is located in a sustainable location and would facilitate no.3 3-bedroom dwellings, no.4 2-bedroom dwellings, a 1-bedroom unit and no.2 studios. The scheme would facilitate the regeneration of a site that has been vacant for an extended period, a short distance from the centre and train station. The applicant has reviewed the previous scheme with a new design team to ensure improvements in the design and deliverability.

Previous Scheme

- 1.4 This scheme follows a previously granted permission for a parallel scheme (LPA Ref: LU/251/21/PL), which involved partial demolition and redevelopment to provide 6 flats. The scheme was approved in 2021, and whilst the permission has only just lapsed, the Development Plan remains consistent. In terms of the design approach, the scheme remains consistent in terms of scale and massing as well as materiality and architectural approach. The applicant has engaged a new design team to provide an uplift in units to make the most efficient use of the site, this has prompted the subject planning application.
- 1.5 This statement provides an assessment of the proposed development against the development plan and other material considerations.

Application Documents

- 1.6 The Applicant has commissioned a consultant team to prepare a full planning application for the development of the application site. This statement describes the application proposal in more detail and in the context of the relevant policies. It should be read in conjunction with the following specialist reports, which have been prepared in support of the application:

Document	Consultant
Planning Statement	Planning Insight
Application Drawings	remi_ct Architects
Design and Access Statement	remi_ct Architects
Heritage Statement	JB Heritage
Flood Risk Assessment & Drainage Statement	Akt II
Contamination Statement	GeoSmart
Construction Management Plan	WPS
Ecology Information	Arb Tech

- 1.7 The above documents are considered throughout this *Statement*.

2.0 PLANNING CONTEXT

SITE AND SURROUNDINGS

Location and Surroundings

- 2.1 The application site is situated on River Road in Littlehampton, West Sussex, within the jurisdiction of Arun District Council. Littlehampton is a coastal town and popular seaside resort, positioned along the English Channel on the eastern bank of the River Arun estuary. The site is located within the town centre, adjacent to the docks and riverfront, benefitting from its proximity to key local amenities, transport links, and commercial services.

Immediate Context

- 2.2 River Road is primarily residential in character, interspersed with guest accommodation and minor commercial uses. The site is bordered to the west by the River Arun, offering a direct waterfront aspect, while Riverside Wharf lies to the north. To the east, the site is bounded by the public highway, providing vehicular and pedestrian access. Immediately to the south, 49 River Road is understood to be in residential use, consistent with the gradual transition of the area towards predominantly residential development.

Existing Site and Condition

- 2.3 The site currently comprises a vacant warehouse structure and associated hardstanding, which has remained largely underutilised for an extended period. Its derelict state negatively impacts the visual amenity of the streetscape, particularly given that the surrounding development has generally been carried out at a higher density and to a more refined standard. The site benefits from a highly sustainable location, being in close proximity to Littlehampton Railway Station and the town's commercial core, thereby offering excellent connectivity and accessibility for future development.

Historical Use and Economic Activity

- 2.4 The existing warehouse structure is in a state of disrepair, with its primary function in recent years being ad-hoc storage and parking. The most recent occupant operated on a short-term license agreement, utilising the site on an irregular basis for storage purposes. This lack of consistent economic activity reflects a broader shift in land use patterns in this part of Littlehampton, where residential development has become increasingly predominant. In contrast, opposite the site along Rope Walk and further north within the Riverside Industrial Estate, commercial and industrial activities remain more firmly established.

Heritage and Conservation Considerations

- 2.5 The site is located within the Littlehampton River Road Conservation Area (the 'CA'), which is a designated heritage asset. The existing building itself is a non-designated heritage asset, it is included in Arun District Council's List of Buildings or Structures of Local Character (adopted September 2005). The immediate surroundings also feature a series of non-designated heritage assets, although there are no statutory listed buildings nearby. Given the deteriorated condition of the existing warehouse structure and the presence of an extensive hardstanding area, the site appears as an incongruous gap in the established street scene. As a result, it is considered a negative contributor to the overall character and significance of the Conservation Area.

Planning Designations and Constraints

- 2.6 The application site is situated within Flood Zone 3, indicating a higher level of flood risk that will necessitate appropriate mitigation measures as part of any future development proposals. Additionally, the site falls within the Littlehampton Economic Growth Area, a designation aimed at stimulating local economic investment, regeneration, and sustainable development.



Figure 1 – Aerial Photo of site

PLANNING HISTORY

2.7 The most relevant planning decisions are set out below.

- **LU/251/21/PL:** Partial demolition of number 57 River Road, change of use & redevelopment to provide a flatted development comprising 6 No apartments, with private amenity space, parking & cycle storage. including the partial demolition of the adjacent boundary wall to provide a new pedestrian access & the creation of a floating pontoon with resident morning spaces (resubmission following LU/247/21/PL). This application affects the character & appearance of the Littlehampton River Road Conservation Area & is in CIL Zone 4 (Zero Rated) as flats. **Approved 24/11/21.**
- **LU/247/20/PL:** Partial demolition of existing building, retention of boundary wall & street facade, partial demolition of boundary wall to incorporate new pedestrian gateway & gate, erection of 6 No. flats in 2 blocks connected by shared stair & lift core, on-site parking yard for 8 No. cars & 8 No. cycles & space for communal refuse & recycling bins. This application affects the character & appearance of the Littlehampton River Road Conservation Area & is in CIL Zone 4 (Zero Rated) as flats. **Refused 11/12/20**
- **LU/106/14/PL:** Demolish existing building, retaining the existing façade (part) on River Road and party wall on the South East boundary. Change of use to residential. Construct new three-storey building consisting of 4 no. four bed houses and open parking at ground floor level. **Refused 24/07/14**
- **LU/407/07:** Demolish the existing building, retaining the existing facades on River Road, the northwest boundary flank and party wall on the southeast boundary and construct three storey building containing 9 No 2 bedroom and 3 No 1 bedroom apartments with open parking at ground floor. **Refused 06/02/08. Appeal Allowed 22/10/08**

Planning Reference: LU/251/21/PL

2.8 The most recent planning application (Reference: LU/251/21/PL) permitted the construction of no.6 flats. Whilst there were efforts to discharge the conditions, the applicant reviewed the previous permission and instead decided to seek an improvement of the previously consented scheme via a new submission. The parameters of the previously consented scheme have been considered within this redesign, which aims to optimise the potential of the application site.

3.0 PLANNING POLICY

- 3.1 This section of the Statement provides an overview of the planning policy context in which the proposed development should be considered in accordance with the relevant planning legislation and national policy guidance.
- 3.2 Planning decisions in England and Wales should be taken in accordance with the development plan unless material considerations indicate otherwise. This statutory requirement is set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 3.3 The National Planning Policy Framework (NPPF) is clear in Paragraph 11 that development that accords with an up-to-date Local Plan should be approved without delay.

DEVELOPMENT PLAN

- 3.4 The statutory development plan for Arun District Council consists of:
- Arun Local Plan 2011 – 2031.
 - Littlehampton Neighbourhood Plan 2014.
- 3.5 The above policy documents are considered in the 'Planning Assessment' section.

MATERIAL CONSIDERATIONS

- 3.6 While not forming part of the statutory development plan, the following documents remain important material considerations for the determination of planning applications in Arun:
- National Planning Policy Framework (NPPF).
 - National Planning Practice Guidance (NPPG).

National Planning Policy Framework

- 3.7 On 12th December 2024, the Government formally adopted the revised National Planning Policy Framework (NPPF) in response to the proposed reforms to national planning policy and other changes to the planning system. This revised document consolidates and updates existing planning policies, replacing the previous iteration of the NPPF (December 2023). The revised framework reflects the Government's evolving approach to strategic planning, ensuring that national planning policy aligns with the broader objectives of economic growth, infrastructure development, and housing delivery.

- 3.8 A core principle of the NPPF is the presumption in favour of sustainable development, which underpins decision-making across the planning system. The framework defines sustainable development through three interdependent objectives:
- Economic objective – Supporting economic growth and productivity, ensuring that planning decisions facilitate job creation, infrastructure improvements, and the delivery of commercial and residential developments.
 - Social objective – Delivering a sufficient number of homes to meet current and future needs, fostering well-designed and safe communities with accessible local services.
 - Environmental objective – Protecting and enhancing the natural, built, and historic environment, improving biodiversity, and mitigating the effects of climate change through sustainable resource use.
- 3.9 The revised NPPF is explicitly pro-growth, reflecting the Government’s ambition to significantly increase housing supply through efficient and effective delivery mechanisms. The reforms are intended to streamline the planning process, reduce delays in decision-making, and provide greater certainty to developers, local planning authorities (LPAs), and stakeholders involved in the housing sector.
- 3.10 The NPPF emphasises the importance of an up-to-date Local Plan, stating in Paragraph 11 that where a proposed development is in accordance with an adopted and current Local Plan, it should be approved without delay. This reinforces the Government’s commitment to accelerating the planning and development process, ensuring that LPAs facilitate timely decision-making in line with national housing and infrastructure objectives.
- 3.11 The NPPF is a material consideration in the determination of planning applications, meaning that decision-makers must take its policies into account when assessing development proposals.

National Planning Practice Guidance

- 3.12 The Government launched the Planning Practice Guidance web-based resource in March 2014. The resource is continually updated, with the most recent update reflecting the revised National Planning Policy Framework adopted in February 2019.

HOUSING SUPPLY AND DELIVERY

- 3.13 The latest Draft Authority Monitoring Report 2023-2024, states that the current housing land supply stands at 3.41 years (it is noted that several appeals have found the 5-Year Housing Land Supply as much lower). This figure incorporates a Housing Delivery Test (HDT) buffer of 20%, which has been applied due to underperformance in previous years. As a result, the LPA is subject to the presumption in favour of sustainable development due to the inability to demonstrate a five-year housing land supply.
- 3.14 With respect to housing delivery, the most recent Housing Delivery Test results, published in December 2024, indicate that the Arun district achieved 70% of its required housing delivery over the 2023 monitoring period. This falls below the 75% threshold, triggering the presumption in favour of sustainable development under both the housing supply and housing delivery criteria. Consequently, the LPA faces additional planning pressures, reinforcing the need for a strategic approach to improve housing supply and delivery across the district.

4.0 PLANNING ASSESSMENT

PRINCIPLE OF DEVELOPMENT

Previously Developed Land

- 4.1 The application site comprises previously developed land (PDL) that has remained vacant and in poor condition. The NPPF prioritises the redevelopment of brownfield sites in sustainable locations to support housing delivery, aligning with this proposal to provide nine residential units.
- 4.2 Paragraph 69 emphasises the importance of small and medium-sized sites in addressing housing needs, while Paragraphs 119(c) and 120(d) ascribe substantial weight to using degraded brownfield land for housing, particularly in areas with constrained land supply. Given the district's lack of a five-year housing land supply, the presumption in favour of sustainable development (Paragraph 11d) applies unless substantial harm arises to a designated heritage asset, in this instance, the Littlehampton Conservation Area. In light of the previously approved scheme and the detailed Heritage Statement supporting this application, it has been demonstrated harm to the CA would not arise. The presumption therefore applies.
- 4.3 This proposal fully aligns with NPPF objectives, providing much-needed housing while making efficient use of an underutilised site.
- 4.4 In reusing a PDL site, the scheme would align with the principles of sustainable development as set out in Policy SD SP1a. This policy emphasises the importance of maximising the efficient use of land to meet local and strategic growth objectives. Compared to the previously granted scheme, the scheme would increase the output of the site from six to nine units by rationalising the layouts.
- 4.5 Furthermore, the scheme will positively contribute to the Council's overall housing targets, in accordance with Policy H SP1, which underscores the need for a continuous and sufficient supply of housing to meet current and future demand. Given the borough's ongoing housing shortfall, this development represents a valuable addition to the local housing stock, supporting the strategic aims of the Local Plan while utilising underutilised brownfield land sustainably and efficiently.

Loss of Commercial Use

- 4.6 The application site is located within the Littlehampton Economic Growth Area, which seeks to promote viable regeneration. The application site contains a dilapidated garage/workshop, which has been used by an individual on a license historically. Since the grant of planning permission, that use has now entirely ceased. This means there would not be a loss of any employment on the site, although it is noted that the previous use was for storage on the hardstanding rather than any meaningful employment.
- 4.7 The previous application was accompanied by a marketing report and structural report that demonstrated there was no prospect of continued use as a commercial premises. It concluded that the application site would not be an appropriate location for office space or alternative commercial premises due to River Road not being established for this typology of use. Notwithstanding, the site is located in a residential context, which would limit the typology of commercial premises that could come forward.
- 4.8 The LPA confirmed that the proposed use of the site as residential was supported in principle, going on to grant planning permission for this use. In concluding their assessment, the LPA stated, *"it has therefore been satisfactorily demonstrated that the site does not have a reasonable prospect of employment use in the short term"*. There have not been any changes to the development plan context, and material considerations do not indicate a different conclusion now. The conclusion that the site is not a viable location for employment use remains relevant.
- 4.9 For these reasons, the proposed use as residential, which was established as part of the previous application (LPA Ref: LU/251/21/PL), is acceptable.
- 4.10 Turning to the Littlehampton Neighbourhood Development Plan, policies 1 & 2 prioritise new development within the settlement boundary, which the scheme would comply with. Policy 1 reiterates compliance with the Arun Local Plan which is fully assessed within this *Statement*.

HOUSING

Housing Mix

- 4.11 Policy H DM1 (Housing Mix) sets out that the LPA will seek a mixture of different types of housing on development sites. The LPA has published limited information with respect to an updated SHMA. The Arun Housing Strategy Housing Baseline (2024) does not contain future predicted needs, as this will likely arise further in the emerging local plan process. The scheme would provide:
- 3 x studio/1 bed dwellings (30%)
 - 4 x 2 bed dwellings (44%)
 - 2 x 3 bed dwellings (22%)
- 4.12 The scheme would, therefore, deliver a range of units leaning toward 1 & 2-bed units, which is deemed appropriate given that it is a flatted scheme in a town centre location. The scheme would achieve the same number of 2 & 3-bed units as the previously consented scheme. Through the rationalisation of the scheme and improvements in design, the application proposal would provide the additional studio/1-bed units. This carries significant weight as a benefit in the context of a lack of 5-year housing land supply and chronic under-delivery. This ensures the scheme's viability whilst not compromising the delivery of medium and larger residential units. Given the scheme would deliver a range of units the scheme complies with H DM1.

Quality of Accommodation

Internal Environment

- 4.13 Planning policy at all levels seeks to improve the built environment through the planning process. Local Plan policy D DM2 states that new housing developments should meet the Nationally Described Space Standards ("NDSS"). All of the units would meet or exceed the NDSS, they would be dual-aspect and benefit from the outlook over the river, creating accommodation that is desirable and conducive of modern living.

Outdoor Space

- 4.14 Each unit would benefit from private outdoor space in the form of balconies, which vary in size. There is access to open spaces nearby and the coast further afield, all of which are in walking distance. Those living at the site would have access to private and public spaces.

Residential Moorings

- 4.15 The installation of a pontoon for private moorings would contribute to the expansion of available mooring spaces within the area, thereby enhancing the accessibility and utility of the waterfront. This initiative aligns with Policy EMP SP2 of the Local Plan, which aims to promote and support the development of additional and improved leisure activities in Littlehampton. Furthermore, it is consistent with Policy TOU SP1, which acknowledges the critical role that waterfronts play as key tourism assets. By increasing mooring capacity and fostering greater activity along the waterfront, the proposed pontoon would enhance both the recreational and economic vitality of the area, supporting broader objectives for sustainable development and tourism growth which is highlighted as fundamental to Littlehampton's improvement.

DESIGN

- 4.16 Planning policy at all levels seeks to secure high-quality design. Section 12 of the NPPF 'Achieving well-designed places' sets out that achieving good design is a key aspect of sustainable development. Paragraph 127 states that decisions should ensure new development functions well and adds to the quality of an area, are visually attractive because of good architecture including layout and appropriate landscaping, is sympathetic to local character, establishes place and optimises development potential.
- 4.17 The Local Plan seeks to ensure residential development proposals make efficient use of land while respecting the existing site characteristics and local context. This includes careful consideration of layout, landscaping, density, scale, massing, materials, and architectural detailing (Policy D SP1). Site analysis should inform the design, ensuring sustainability through inclusivity, adaptability, security, attractiveness, usability, health and well-being, climate change mitigation, and habitat protection. When assessing residential schemes, the Council will consider key design aspects (Policy D DM1):

Character – The scheme follows the parameters of the previous approval whilst introducing a contemporary design that incorporates the existing structure. The scheme would infill an existing vacant site that detracts from the location, it would result in the regeneration of the scheme at an optimum density, ensuring the site will come forward after a varied planning history.

Appearance & Attractiveness – The scheme would achieve a high standard of architecture, material quality, and landscaping. As demonstrated in the DAS the scheme has been developed to draw on the wider material palette characterised by the dockland aesthetic, including the pitched roofs. The proposal remains consistent with the previously approved scheme concerning materiality and architectural principles.

Impact – The scheme is relatively unconstrained in terms of the adjacent occupiers; this is fully considered in the below ‘Neighbouring Amenity’ section.

Innovation – The scheme would include an innovative approach utilising sustainable design principles to deliver a modern riverside scheme that would enhance the streetscene and wider character.

Adaptability – The scheme features a range of units suitable that are adaptable to future needs.

Crime Prevention – Crime prevention measures have been considered from the outset and further advice would be sought at the next design stage.

- 4.18 As can be observed, the proposal would comply with local plan policies D SP1 & D DM1 that seek to foster positive design outcomes in Arun. The proposal would redevelop the site to provide an innovative scheme that optimises the site, it would only result in minor changes compared to the previously approved scheme and given planning policy remains consistent, is acceptable in this regard.

HERITAGE

Planning Policy

- 4.19 National planning policy states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Local Plan policy HER DM3 requires development proposals affecting conservation areas to preserve or enhance their character of appearance, including respecting established positive characteristics and protecting their setting.

Heritage Assets

- 4.20 The scheme has been assessed in the context of the designated heritage asset, that being the Littlehampton Conservation Area, this is fully detailed in the accompanying Heritage Assessment. 57 River Road is included in Arun District Council's List of Buildings or Structures of Local Character (adopted September 2005), this means that it is a non-designated heritage asset ('NDHA') asset in a Conservation Area ('CA'). It being an NDHA in a CA means that it is elevated in the heritage hierarchy, the Heritage Statement fully considers the development in this context.

Significance

- 4.21 The Heritage Statement contains a detailed analysis of the significance of 57 River Road, the below provides a summary.
- 57 River Road is recognised as a building of local heritage significance by Arun District Council due to its historical and architectural value. As a surviving example of a 19th-century warehouse along River Road, it holds moderate historical significance but only low to moderate architectural significance. While the building retains some original structural elements, such as flint cobble walls and a traditional warehouse form, extensive 20th-century alterations—such as the removal of the southwestern bay, modern cladding, and replacement windows have diminished its aesthetic value.
 - The building meets several heritage criteria to varying degrees. It is a rare survivor of Littlehampton's historic riverside warehouses, contributing to its significance. Although its aesthetic interest has been weakened by modern modifications, its original warehouse form remains identifiable. It also holds historical associations with Thomas Isemonger, a local shipbuilder and coal merchant. However, it lacks archaeological interest, designed landscape value, landmark status, and social or communal significance. Overall, 57 River Road remains an important local heritage asset, though its architectural integrity has been compromised over time.
- 4.22 As can be observed whilst there is historical significance attached to the building, this has become diluted by virtue of alterations which vary but overarchingly have detracted from the site and building. This fundamentally reduces the significance of the building.

Proposals Assessment

- 4.23 The scheme involves partial demolition of the existing structure, which would be integrated into the proposed scheme. This remains consistent with the previously approved scheme. The demolition of the existing fabric, as contained in the Heritage Assessment, would be of low-moderate significance. The scheme would retain the date stone with the name T. Isemonger, which would remain legible. It would also involve the partial demolition of the wall. As detailed in the heritage statement, the scheme would retain historic fabric and openings on each floor would remain present, although in a different use. Further mitigation in the form of a historical board could also be secured by a planning condition. It is noted that this typology of development has been accepted by the LPA and is evident in the adjacent scheme and other developments on River Road.
- 4.24 The scheme itself comprises the construction of a 3.5-storey flatted building that would integrate the existing structure, creating a successful blend of old and new without undermining the front façade of the existing building. It would utilise a muted colour pattern of grey stock bricks and have a traditional typology of form utilising pitch and gable roofs. The design approach remains consistent with the previous scheme which was supported in heritage terms.
- 4.25 Turning to the development of the yard, this is representative of the historic wharves which would have been open, and the existing site has remained as such. As can be observed, an emerging pattern of infilling during the 20th century met the growing demands for commercial/shipping facilities along the river. This has led to the riverside being characterised by being enclosed. As identified in the Heritage Statement and echoed by the LPA during pre-application discussions as well as at the application stage, the development of the yard is deemed a positive aspect of the scheme in the context of heritage.

Heritage Balance

- 4.26 The scheme would deliver 9 dwellings and would retain the front façade of the existing building which is deemed to have the most heritage value. Further mitigation for the loss of the fabric, which dates much later, can be secured by installation of an information board. The development of the yard would follow the development pattern which has occurred in more recent history, the scheme would replicate the design approach of integrating historic structures within contemporary interpretations. The NPPF paragraph 216 states that the impact of proposals on designated heritage assets should be considered concerning the public benefits. The regeneration of the site to provide new housing, set against the nil prospect of the site continuing in its current use due to the condition and economic viability coupled with the high-quality design solution, indicates the scheme weighs in favour of the grant of planning permission as concluded by the Heritage Assessment.

NEIGHBOURING AMENITY

- 4.27 Planning policy at all levels seeks to protect the existing amenity of adjoining occupiers. The proposed development would not result in a negative impact with regard to loss of privacy, daylight and sunlight and overbearing impact. Policy QE SP1 of the Local Plan requires that new development not significantly adversely impact adjacent residential amenity, namely relating to daylight, privacy, outlook and noise. These are assessed below:
- No.47 River Road - the scheme would not result in an impact with regard to loss of daylight or impact on outlook due to there not being habitable windows on the adjacent flank. The proposed balconies would be at an oblique angle and would not impact privacy. Impact with regard to noise would not arise. The scheme follows the same scale and massing as was previously considered acceptable in terms of neighbouring amenity.
 - No. 49 River Road – the scheme remains consistent on this flank; the scheme is set back from the boundary, and the massing tapers to the central portion of the site. The design ensures that harm would not arise compared to the previously approved scheme in respect of loss of daylight, overbearingness or noise. It would be set back from the site boundary and steps down.
 - Pharos Quay – the proposed scheme is on the opposite side of Pharos Quay, there would be a separation distance of approximately 13m, which is a marginal shortfall compared to the Design Guide. This relationship was found acceptable as per the previously approved scheme. Given that the site is in a dense urban location and this relationship is commonplace on River Road, the scheme would not result in significant harm when taking into account the context.

- 4.28 Local Plan policy QE SP1 states that *significant* harm should not arise to neighbouring amenity. The scheme would infill a currently vacant plot following the established development pattern on River Road. As demonstrated above it would not result in a harmful impact on neighbouring amenity in accordance with QE SP1.

TRANSPORT AND PARKING

Sustainable Transport

- 4.29 The site is located a short distance from Littlehampton train station, which provides comprehensive railway links. There is a bus stop a short distance away on Arun footbridge which has services to Chichester and East Preston.

Car Parking

- 4.30 The scheme includes 9 car parking spaces, which would be sufficient to provide 1 space per unit, given that the site is in a sustainable location with access to sustainable transport.
- 4.31 The Arun Car Parking Standards designate the site in Parking Behaviour Zone 4, the standards are no.2 spaces for each 3-bed unit and one space for 2-bed units, plus 20% for visitors. The car parking requirement, according to the standards, is 11 spaces.
- 4.32 Census Data indicates that 33% of households have zero cars, 45% have one or more cars, and 17.5% have two cars. This means that on average, most households have 0 – 1 cars, with a significant portion not owning a car (see Appendix A). Applying the Census Data means that there would be a parking demand for seven spaces¹. The scheme could provide one car parking space per residential unit, which would exceed demand based on the Census. The previous scheme proposed one space per unit; the proposals are, therefore, consistent.
- 4.33 In terms of visitor parking, the parking standards would require 1.8 spaces, there are public car parks on Surrey Street (6 mins walk) and at Littlehampton Train Station (3 mins walk). There is some restricted parking on the frontage, as such visitors to the site would be adequately served, and it is anticipated that this would mainly be through sustainable transport means. Impact on the highway would not arise due to there being ample choice for visitor parking, the proposal remains consistent in this regard with the previous proposal.

¹ (9*0.175= 1.5, 1.5*2= 3 total no.2 spaces demand. 9*0.45= 4 total no.1 spaces demand – overall = 7 spaces demand.)

- 4.34 The NPPF 116 states, “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”. Adequate parking based on evidence would be provided, and there are a range of public car parks nearby, so impact on the local highway network would not arise.

FLOODING AND DRAINAGE

- 4.35 The NPPF paragraph 161 sets out that development should follow a sequential, risk-based approach in terms of the location of development with regard to flooding. The following paragraph, 162, explains that the aim of the sequential test is to steer new development to areas at the lowest risk of flooding. In this regard, the NPPF sets out that development should not be allocated or permitted if there are sites in a more sequentially preferable location.
- 4.36 Paragraph 161 sets out that if development is not capable of being accommodated in another location, then the exception test may have to be applied. In this regard, the need for an exception test will depend on the vulnerability of the site in line with the Flood Risk Vulnerability Classification set out in NPPG. Paragraph 161 sets out that for the exception to be passed, it should be demonstrated that the following tests have been met:

“a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Site Appropriateness

- 4.37 The application site is located in a town centre, which is highly sustainable. It is in an entirely residential context on Previously Developed Land. The reuse of such land is fundamental to housing delivery, the LPA cannot demonstrate a 5-year Housing Land Supply, which strongly indicates a lack of available sites for housing development in Arun. The site has previously been found acceptable for residential use; the development plan context remains consistent with that previous decision.

Exception Test

- 4.38 The planning application is accompanied by a Flood Risk Assessment ('FRA') that sets out compliance with the Exception Test. The scheme has been designed to be above the flood level and would be secure going forward as per the mitigation contained in the FRA. Significant public benefit by securing the site for residential use and improving the site in respect of flooding. Given the above, it is considered that with suitable mitigation and the public benefit arising from the proposal, the scheme is acceptable in the context of flood risk and passes the Sequential & Exception Test.

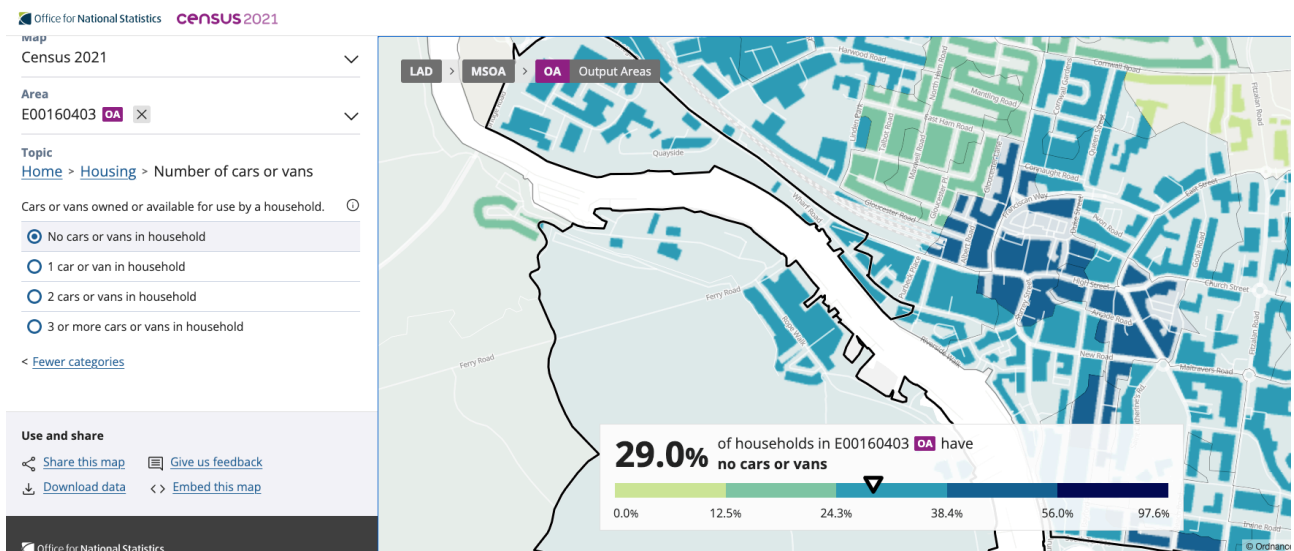
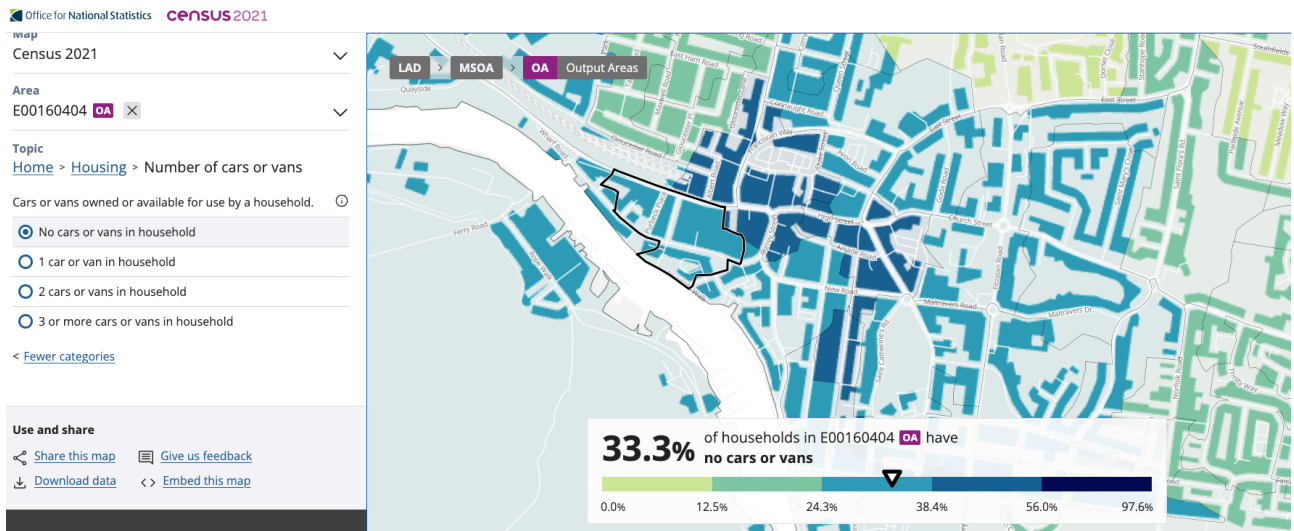
5.0 PLANNING BALANCE & CONCLUSION

- 5.1 The proposed development represents an efficient and sustainable use of a previously developed site in a highly accessible town centre location. The scheme aligns with the NPPF's objectives to prioritise PDL redevelopment, particularly in areas with constrained land supply and poor delivery. The proposal's provision of nine residential units contributes positively to local housing targets and meets identified housing needs through an appropriate mix of unit sizes.
- 5.2 The loss of commercial use has been fully justified, with previous assessments and the LPA determining the site is no longer viable or suitable for employment purposes. The Littlehampton Neighbourhood Development Plan and Arun Local Plan both support residential development within settlement boundaries, reinforcing the site's suitability for housing, which was previously approved.
- 5.3 The scheme would be high-quality design, balancing contemporary architecture with the retention of the front façade of the historic warehouse building. It respects and enhances the character of the Littlehampton Conservation Area while integrating innovative and sustainable design principles. The proposal aligns with national and local heritage policies, ensuring that the impact on heritage assets is appropriately mitigated. This approach has been found acceptable before in relation to the previously approved scheme.
- 5.4 Neighbouring amenity has been carefully considered, with the proposed development designed to avoid adverse impacts related to privacy, daylight, and noise. The density and scale are in keeping with the established development pattern on River Road, ensuring a harmonious integration with the surrounding built environment.
- 5.5 The development provides sufficient on-site parking in line with local standards and census data, demonstrating that parking demand will be met without an adverse impact on the local highway network. The site's excellent access to public transport and town centre amenities further supports the case for a sustainable transport approach and a reduction in car parking provision. Evidence has been provided that car parking in this part of Littlehampton is comparatively low, as demonstrated by the Census data contained in Appendix A.
- 5.6 Flood risk and drainage have been comprehensively assessed, with the proposal meeting the requirements of the sequential and exception tests. The design incorporates mitigation measures to ensure the safety of future occupants while contributing to broader sustainability objectives.

- 5.7 In conclusion, the proposal delivers housing in an area of chronic need through the regeneration of an underutilised brownfield site in a sustainable and design-conscious manner. It aligns with national and local planning policies, supports strategic housing and regeneration objectives, and delivers social, economic, and environmental benefits. Given the absence of any significant adverse impacts, the presumption in favour of sustainable development should apply, and planning permission should be granted accordingly.

Appendix A. Census Data

Most appropriate to use E00160404 location as this is a residential area of similar density and adjacent to the subject site.





PLANNING
INSIGHT

Office for National Statistics **census2021**

map
Census 2021

Area
E00160404 **OA**

Topic
[Home](#) > [Housing](#) > Number of cars or vans

Cars or vans owned or available for use by a household. ⓘ

☐ No cars or vans in household

☒ 1 car or van in household

☐ 2 cars or vans in household

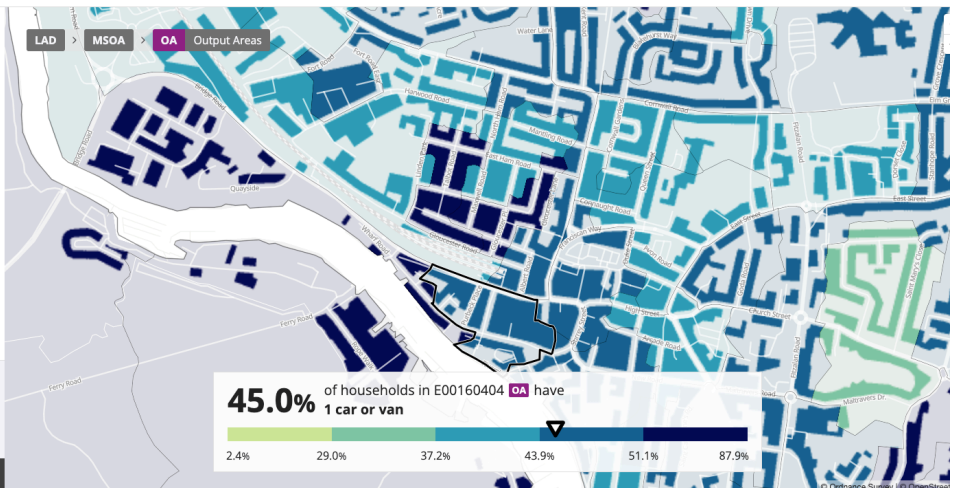
☐ 3 or more cars or vans in household

< [Fewer categories](#)

Use and share

[Share this map](#) [Give us feedback](#)

[Download data](#) [Embed this map](#)



Office for National Statistics **census2021**

Census maps

Use our maps to find out what people's lives were like across England and Wales in March 2021.

Map
Census 2021

Area
E00160404 **OA**

Topic
[Home](#) > [Housing](#) > Number of cars or vans

Cars or vans owned or available for use by a household. ⓘ

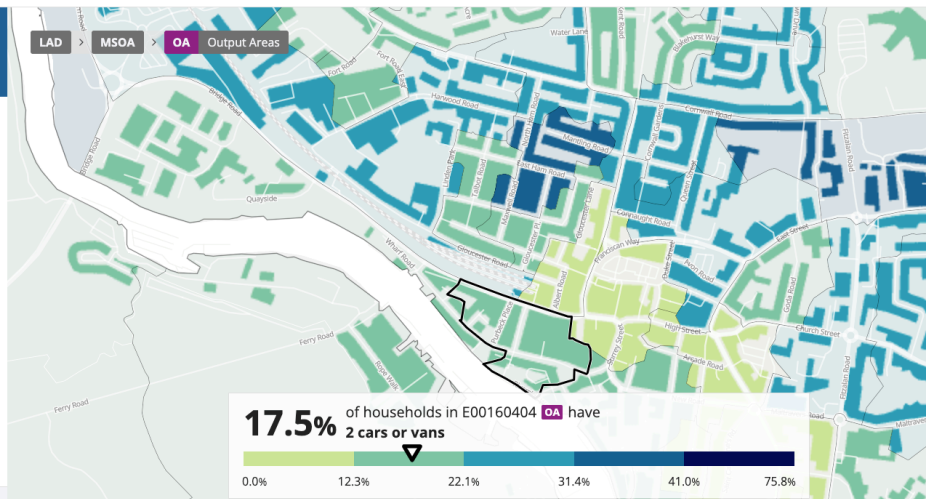
☐ No cars or vans in household

☐ 1 car or van in household

☒ 2 cars or vans in household

☐ 3 or more cars or vans in household

< [Fewer categories](#)





PLANNING
INSIGHT