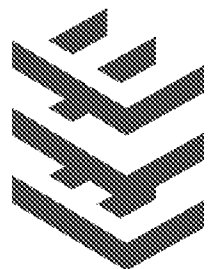


Planning and Heritage Statement

18-22 East Street, Littlehampton

June 2018



ECE Planning

Project Name: 18-22 Eat Street, Littlehampton

Location 18-22 Eat Street, Littlehampton, BN17 6AW

Client: Love Long Ltd

File Reference: P1643

Issue	Date	Author	Checked	Notes
PL1	25.06.2019	K Tipper	C Barker	Initial Draft
PL2	28.06.2019	K Tipper	C Barker	Client Issue
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Planning Statement – 18-22 East Street, Littlehampton

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1. Introduction

- 1.1. This Statement has been prepared by ECE Planning on behalf of our client, **Love Long Ltd**, in support of their proposal for the:

‘Erection of 2no. outbuildings to the rear of 18-22 East Street to provide communal /multifunctional space and therapy rooms ancillary to the lawful use of the site as a Private Detox and Rehabilitation Clinic (C2 Use Class)’ at 18 – 22 East Street, Littlehampton, BN17 6AW.

- 1.2. This Statement sets out the relevant background for the determination of the planning application, including a description of the site and its surroundings, the relevant planning history, relevant planning policy, details of the development proposed and an assessment of the relevant planning and heritage considerations.

- 1.3. The proposals for the site have been informed by the Arun Local Plan 2018.

- 1.4. This Planning Statement is accompanied by the following documents:

- **Planning Application Forms and Notices**
- **Plans & Elevations**
- **Design and Access Statement**
- **Validation Checklist**
- **Biodiversity Checklist**

2. The Site

- 2.1. The site is located in the centre of Littlehampton, and to the south of East Street (Figure 1). The site is located within the built-up area boundary of Littlehampton. The site is also located within Flood Zone 3 in the north and west corner of the site, Flood Zone 2 in the centre of the site and Flood Zone 1 in the south and east corner. The site has a slight incline, rising from the north (front) to the rear (south) of the site

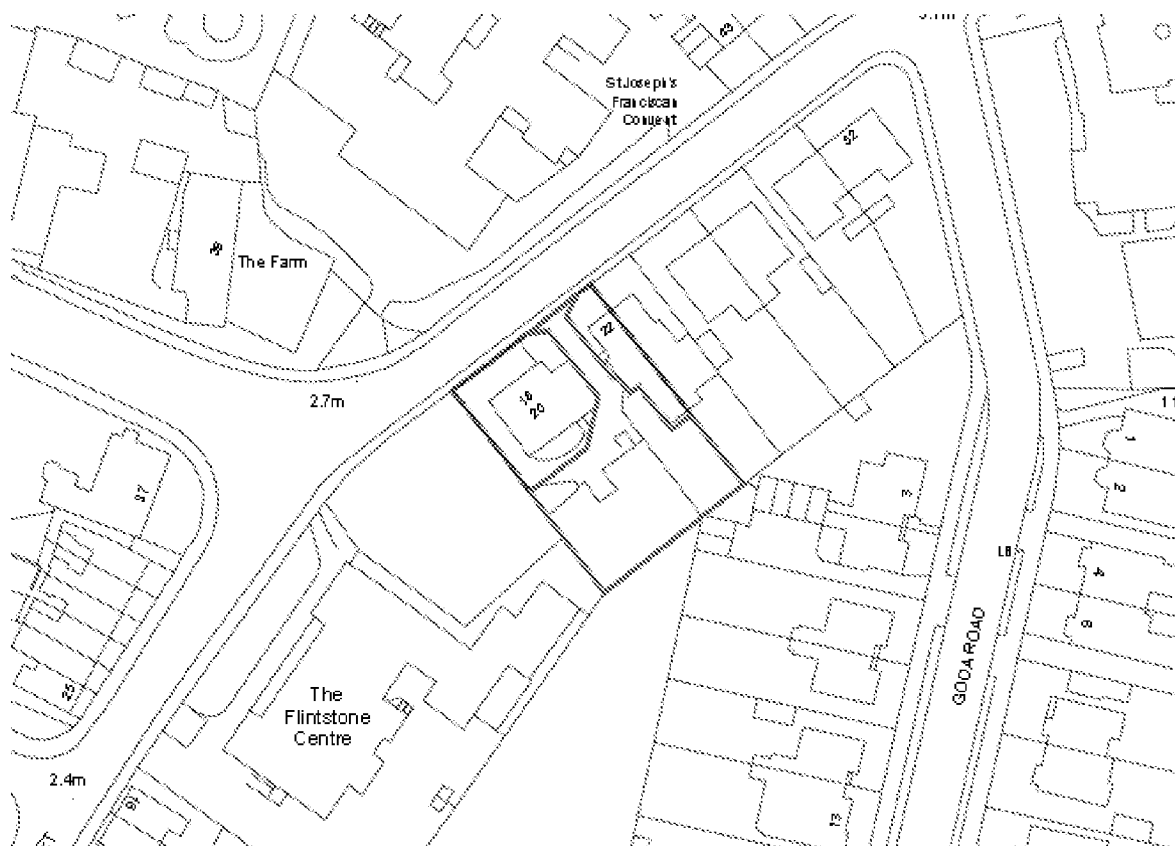


Figure 1 Site Location

- 2.2. The site is situated within East Street Conservation Area, and whilst the buildings are not statutorily listed they are noted as being 'Buildings of Character' within the adopted Local Plan (policy HER DM2).
- 2.3. These properties sit at an end to a group of similarly constructed two-storey properties characterised by flint with red brick quoins and course detail. Other features also include front gable bargeboards with finial and brick chimney together with small front gardens separated from the public footpath by a flint boundary wall with red brick capping.



Figure 2 Street Views of Site

- 2.4. Number 18/20 East Street occupies a wide street frontage with deep stepped entrance at the eastern side of the front elevation with vehicular access leading through to the rear. The western side of the property previously provided a second vehicular access to the rear; however, this has been closed to allow for secure bin and cycle storage behind gates. The rear gardens to both of these properties were previously entirely concrete hardstanding and have recently be re-laid, in part, with paving.
- 2.5. To the west of the site is 'The Flintstone Centre', an alternative provision college. This site adjoins the tarmacadam playing area associated with this college.
- 2.6. To the rear of the site is a wedge shaped plot which was previously associated with the commercial properties (Dairy Community Centre) accessed from Church Street but which is now in the process of being developed for residential purposes. The rear boundary of the site backs onto the narrow part of the 'wedge' and then beyond onto the back gardens of properties in Goda Road, a residential street falling outside of the Conservation Area.



Figure 3 Views of recently completed former Dairy site to rear

- 2.7. To the north of the property, on the opposite side of East Street, is St Joseph's, a Franciscan Convent of relatively modern brick construction.

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3. Planning History

- 3.1. The following list of planning applications relate directly to the application site and are ordered chronologically by date with the most recent listed first.

18-22 East Street

- 3.2. **LU/357/18/PL** Change of use from former doctors surgery (D1 Non-residential Institutions) to private detox & rehabilitation clinic (C2 Residential Institutions). Approved 26 February 2019

- 3.3. This most recent application has been successfully implemented by the applicant with the use fully operational.

- 3.4. **LU/65/17/PL** Change of use from Doctors Surgery (D1 Use Class) to (C3 dwelling houses) comprising 1no. 4-bed dwellinghouse & 1no. 3-bed dwellinghouse. Approved May 2017

- 3.5. This previous application was granted planning permission for the conversion of this former doctors surgery to 2no residential dwellings; however, this permission was not implemented in full.

18/20 East Street

- 3.6. **LU/490/89** Change of Use of first floor from residential to Doctors' Surgery (Ancillary to ground floor use) and extensions to rear. Approved February 1990

- 3.7. **LU/294/89** Extension to provide additional surgery accommodation at ground floor level, change of use of first floor from flat to offices including external stair. Approved August 1989

- 3.8. **LU/97/89** Extension to provide additional surgery accommodation at ground floor level, extension and conversion at first floor to 3no. one bed flats. Approved April 1989

22a/22b East Street

- 3.9. **LU/95/01** Change of use from residential to form additional doctors accommodation including consulting suites. Approved 05 June 2001

Relevant Planning History associated with The Old Dairy, Church Street

- 3.10. The following applications are relevant to the site located to the rear of 18/20 East Street at the Old Dairy and which has been implemented and is nearing completion.

- 3.11. **LU/400/15/PL** Variation of condition15 imposed under LU/13/15/PL relating to demolition works. Approved 21 March 2016

- 3.12. **LU/367/15/DOC** Application for approval of matters reserved by condition imposed under LU/13/15/PL relating to condition 15 for Construction Management Plan. Approved 10 December 2015

- 3.13. **LU/13/15/PL** Demolition of original dairy distribution depot and of eight dwellings and ancillary works. Approved 23 April 2015

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4. The Proposal

- 4.1. The proposed development is for the erection of two single storey outbuildings located to the rear of 18-22 East Street, to accommodate communal/multifunctional space and two therapy rooms ancillary to the use of the site as a private detox and rehabilitation clinic. The clinic received planning permission in February 2019 however, it did not include provision of ancillary therapy space, and therefore the proposed rooms would allow for the necessary clinical care to be provided in separate accommodation away from the habitable areas. The use was fully supported by Consultant Psychiatrist and GP, and these letters of support are re-appended for reference.
- 4.2. The proposed single storey outbuilding to the rear of 18-20 East Street is the larger of the two proposed buildings, providing communal room, kitchen and office facilities within a building of approximately 50m². The building will be constructed using flint facing elevations, similar to the existing boundary wall and the facades of the host property.
- 4.3. The smaller of the proposed outbuildings, located to the rear of 22 East Street, measures approximately 25m² and will provide a flexible therapy space. This proposed building will be timber clad.
- 4.4. Both of the outbuildings will benefit from green roof. Additional planting is proposed to the rear of 22 East Street, whilst smaller raised planters are proposed within the rear garden area at 18-20 East Street.
- 4.5. No alternations are proposed to the existing main buildings as part of this application.

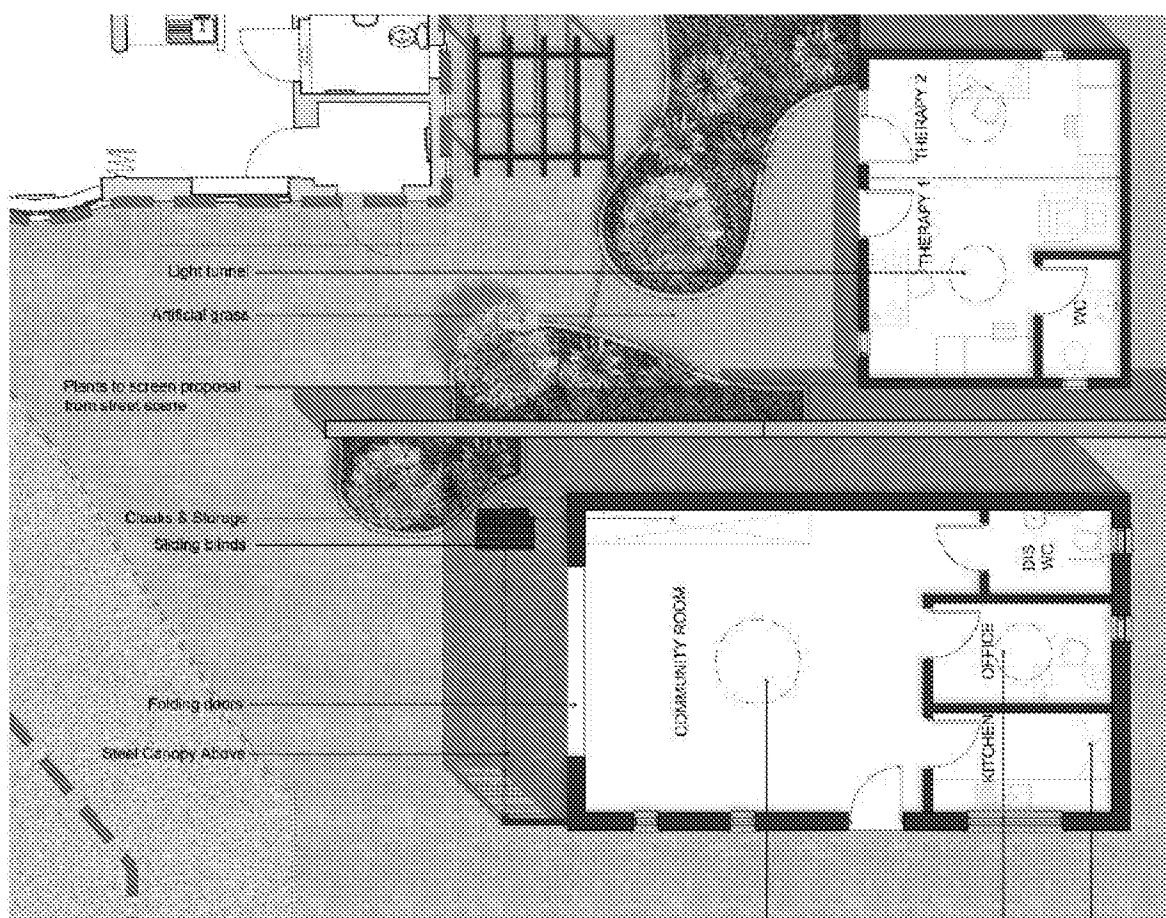


Figure 4 Proposed layout

5. Policy Overview

5.1. Introduction

- 5.1.1. A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are Development Plans, which seek to guide the decision making process. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the Development Plan comprises the Arun Local Plan 2011 – 2031 (adopted July 2018) and the Littlehampton Neighbourhood Development Plan 2014. The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) are material considerations.

5.2. National Planning Policy Framework (NPPF)

- 5.2.1. The NPPF was adopted in 2012 with a revised version published in February 2019. At its heart is the presumption in favour of sustainable development. There are three dimensions to sustainable development: *social, economic and environmental* which is identified at **paragraph 8**.
- 5.2.2. Section 6 is about 'building a strong, competitive economy' and at paragraph 80 states that *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'*
- 5.2.3. **Section 9** promotes sustainable transport and how this can be delivered through the planning system. **Paragraph 103** states that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The site is located within a highly sustainable location with access to an abundance of sustainable transport modes.
- 5.2.4. **Section 14** of the NPPF is concerned about *'meeting the challenge of climate change, flooding and coastal change'*. In particular, **paragraph 164** states that *'applications for some minor development and changes of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 50.'* Flood risk to the site is discussed in detail within Section 6 of this Statement.
- 5.2.5. **Section 16** of the NPPF, conserving and enhancing the historic environment, seeks to protect and preserve the setting and character of conservation areas, although it recognises the importance for local planning authorities to identify development opportunities within such areas which represent an enhancement and improvement to the built form of the locality (**paragraph 200**).
- 5.2.6. The proposed development will have no detrimental impacts on the historical significance or architecture of buildings, as the main existing buildings will remain architecturally the same, whilst the proposed outbuildings will be subordinate and constructed utilising sympathetic materials.
- 5.2.7. Overall, it is concluded that the proposals comply fully with the policy objectives of the National Planning Policy Framework 2019.

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5.3. National Planning Practice Guidance (NPPG)

- 5.3.1. The National Planning Practice Guidance (NPPG) was published by the Government in March 2014 and supplements those overarching objectives of the National Planning Policy Framework. The guidance provided by the NPPG has been fully considered in the creation of this application and the proposed conversion is seen to be fully compliant with it.

5.4. Strategic Planning Policy – Arun Local Plan 2011 – 2031

- 5.4.1. The recently adopted Arun Local Plan 2018 sets out the strategic vision, objectives, policies and proposals for development in the LPA to 2031 and beyond. The following policies in the Local Plan are considered relevant to this application:

- 5.4.2. Policy SD SP2 (Built-up Area Boundary) seeks to direct development toward these areas. The application site is situated wholly within the built-up area boundary of Littlehampton

- 5.4.3. Policy SKILLS SP1 (Employment and Skills) sets out that the Council will encourage development proposals which help to raise skills levels and increase employability. The proposed development will provide people with the opportunity to work and develop new skills in this field.

- 5.4.4. Policy D SP1 (Design) encourages development to reflect the characteristics of the site and local area in terms, amongst other requirements, the layout, landscaping, scale, materiality and detailing.

- 5.4.5. Policy H DM2 (Independent Living) whilst this policy does not strictly apply to the proposed development (C2 Use Class), the intention is clear that new facilities which assist with independent living will be supported in principle, subject to satisfying a number of criteria. In this regard, it is considered that the proposed development would satisfy these criteria.

- 5.4.6. Policy HWB SP1 (Health and Wellbeing) opportunities to promote healthy communities and reduce health inequalities will be supported.

- 5.4.7. Policy T SP1 (Transport and Development) and Policy T DM1 (Sustainable Travel). Both of these policies seek to promote sustainable development and reduce the reliance of developments on the private vehicle. In this regard, the proposed development is ideally situated within close proximity to a number of different modes of sustainable travel and within walking and cycling distance of amenities and services.

- 5.4.8. Policy HER DM2 (Locally Listed Buildings or Structures of Character) and Policy HER DM3 (Conservation Areas). These policies seek to preserve and enhance the historic environment including buildings which are not statutorily listed but of local historic character.

- 5.4.9. Policy W DM2 (Flood Risk) seeks to direct new development to areas less probable to flooding. Where vulnerable uses are located within areas at risk of flooding, consideration needs to be given as to the suitability of such development and any mitigation measures.

5.5. Strategic Planning Policy – Littlehampton Neighbourhood Development Plan 2014

- 5.5.1. The following policies within the adopted Littlehampton NDP area considered relevant to this application and are listed below.

- 5.5.2. Policy 2: A Spatial Plan for the Town. This policy seeks to focus new growth within the built-up-area boundary and especially along the Fitzalan Corridor, in which the site is located.

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- 5.5.3. Policy 17: Buildings and Structures of Character. This policy states that the impact of development on these non-designated heritage assets will be taken into account in determining applications.
- 5.5.4. Policy 22: Design of New Development. Similar to Arun Local Plan policy D SP1, this policy equally encourages high quality design which responds to the site and local characteristics.
- 5.6. **Supplementary Planning Document – Buildings or Structures of Character (2005)**
- 5.6.1. This SPD was adopted prior to the Local Plan, however in accordance with policy HER DM2, the local authority continue to identify the buildings within this SPD as making a positive contribution to the local distinctiveness.
- 5.6.2. The SPD covers buildings or structures which are not statutorily listed but are considered to be of good quality design and appearance and which contribute to the character and appearance of the area in which they are situated.
- 5.6.3. The site was selected as for the following reasons:
- Building which are extremely good examples of traditional or established style, or unusual type.
 - In special cases, buildings or structures which contribute towards the local townscape or have important historical associations.
 - All buildings must be largely intact and not adversely affected by later extensions or alterations.
 - Preferably, although not exclusively, they should make a positive contribution to their surroundings or the street scene.
- 5.7. **Supplementary Planning Guidance – Conservation Areas (October 2000)**
- 5.7.1. This document should be read alongside Policy AREA2. Any new development should acknowledge the character of their special environment in their layout, form, scale, detailing, use of materials and the spaces created between buildings, and they should retain or emphasise the qualities of the townscape and streetscape in the area.
- 5.8. **Supplementary Planning Guidance – Parking Standards (October 2000)**
- 5.8.1. This SPG sets out the level of parking required to be provided for new development. This document pre-dates the NPPF and therefore this should also be read in the context of paragraph 109 of the NPPF.

6. Planning Appraisal

6.1. Introduction

6.1.1. The main issues relating to the proposal are as follows:

- Principle of Development
- Heritage Environment
- Flood Risk
- Residential Amenity
- Parking and Servicing

6.2. Principle of Development

6.2.1. The principle of development within the built-up area boundary of Littlehampton is supported in policy terms subject to appropriate quantum of development, design, scale, form and appearance. Government guidance supports effective and efficient use of land, such as the application site.

6.2.2. The site is situated within a highly sustainable location and on the fringe of the Fitzalan Corridor, where Neighbourhood Development Plan Policy 3 seeks to locate development. Therefore, the principle of ancillary development is appropriate subject to satisfying all other relevant considerations, and in particular design and impact on statutory and non-statutory heritage assets.

6.2.3. Planning permission for the change of use of the main buildings has been implemented in accordance with **LU/357/18/PL**. The proposed 2no. outbuildings will be wholly ancillary to this lawful use of the site and provide necessary communal and therapy space within a quiet location, separate to the habitable accommodation within the main buildings. NPPF paragraph 80 encourages the planning process to help create conditions which allow businesses to expand and adapt.

6.2.4. The existing C2 Use makes a positive contribution to the healthcare provision within this location, and the proposed ancillary accommodation will facilitate in the delivery of this service. The proposed outbuildings are considered to be an effective and efficient use of land within this highly sustainable location and supported in policy terms.

6.3. Heritage Environment

6.3.1. The site is located within East Street Conservation Area (Figure 5) which comprises a number of historic and more modern properties of varying character. The primary focal point within this part of the conservation area is the frontage of existing properties along East Street, characterised by their flint construction.

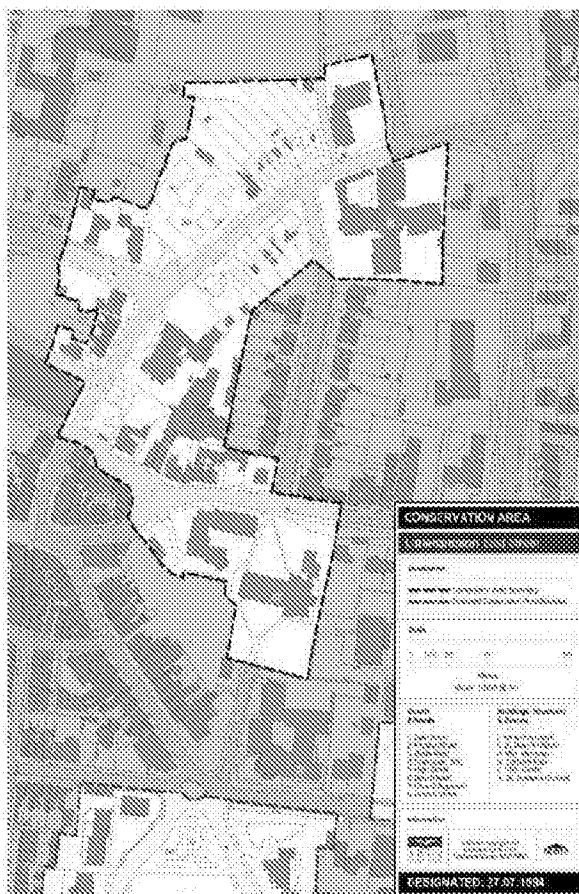


Figure 5 East Street Conservation Area

- 6.3.2. In considering whether to grant planning permission with respect to any buildings or other land in a Conservation Area, it is necessary to have regard to the desirability of preserving or enhancing the character or appearance of that area (Section 72 of the Planning (Listed Buildings and Conservations Areas) Act 1990). The proposed development for the erection of two ancillary and subservient outbuildings, which have been sensitively designed utilising natural materials to reflect the existing locally listed buildings, would represent acceptable development and would not have any undue or adverse impact on this designated Conservation Area.
- 6.3.3. The proposal also includes the reinstate, in part, of a garden area to the rear of 22 East Street and small areas of planting to the rear of 18-20 East Street, thereby reducing the extent of car parking and hard surfacing around the building which forms an enhancement within the Conservation Area in accordance with policy.
- 6.3.4. Policy HER DM2 of the recently adopted Local Plan seeks to protect the appearance and setting of buildings or structures of character from inappropriate alterations and extensions. The proposed ancillary development, as already noted, has responded positively to its location through the subservient scale and choice of materials, and would provide the opportunity to improve the setting of the main buildings through the reduction in hardstanding, and in this regard it is asserted the proposed development is fully in accordance with this policy and that of Policy 17 of Littlehampton Neighbourhood Plan.

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6.4. Design, Form and Appearance

6.4.1. The two proposed outbuildings have been carefully designed to expand the current facilities whilst ensuring there is minimal impact on its setting and local context. The proposed green roofs together with enhance areas of soft landscaping will not only increase the permeability of the site, but assist with softening the impact of built form in this location.

6.4.2. Each of the proposed outbuildings includes rooflights and light tunnels to maximise daylight in the new spaces, and the folding doors will enhance the communal room relationship with the courtyard.

6.4.3. The proposed development is influenced by the surrounding historic context, in particular the use of flint in this location as a dominant building material. The proposed buildings have been designed in a contemporary style whilst utilising this more traditional materials to create a development which responds successfully to its context.

6.4.4. The materials palette has been carefully considered to both integrate and respond to the context, providing a design response that will blend in to its setting.

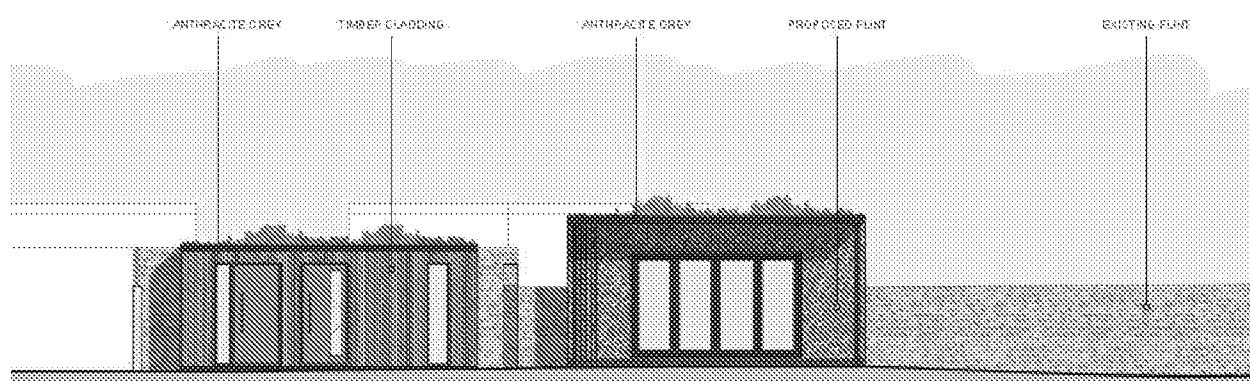


Figure 6 Proposed north elevation

6.5. Flood Risk Assessment

6.5.1. According to the Environment Agency's flood risk mapping, a small part of the application site falls within Flood Zone 2/3. These areas are classified as being areas which could be affected by flooding from either river or sea, if there are no flood defences. The rear of the site, where the proposed development is located, falls within Flood Zone 1, which is classified as land having less than 1:1,000 annual probability of river or seas flooding.

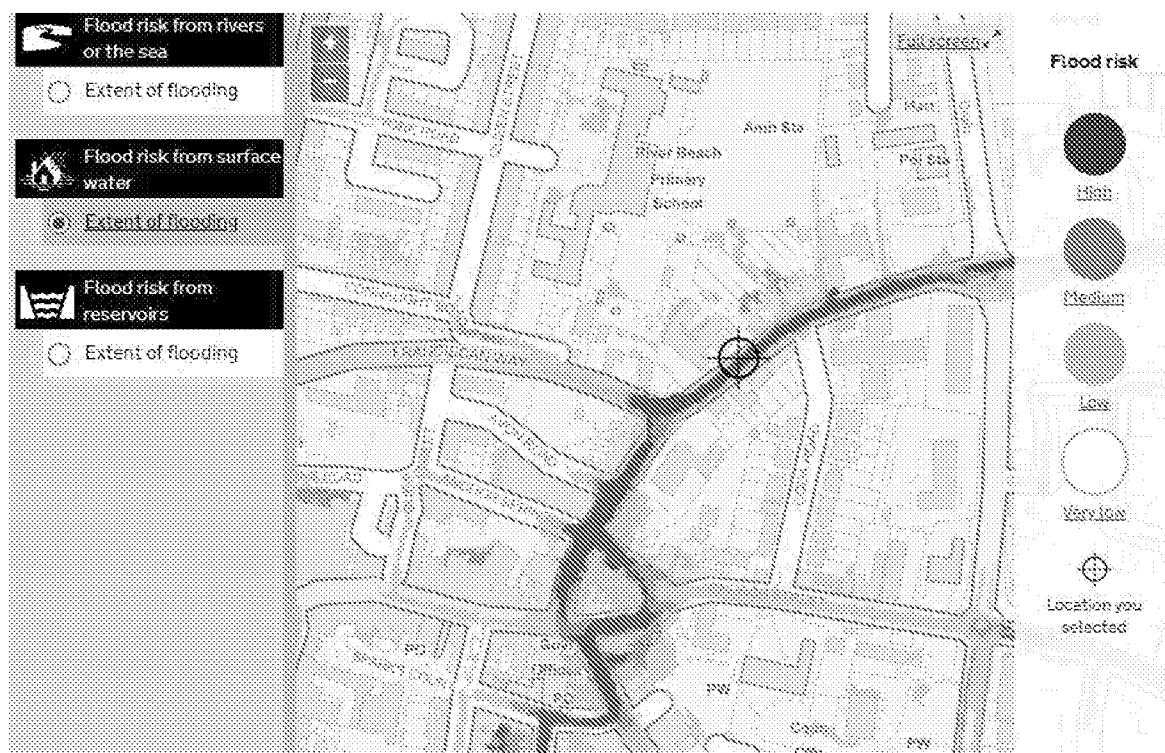


Figure 7 Environment Agency - Surface Water Flooding risk areas

- 6.5.2. The site is shown as being located in a flood zone however there are no records of flooding within the vicinity of the site and this illustrated in Figure 8 below, and as illustrated by Figure 7 above, the rear of the site falls outside of the area most at risk of surface water flooding.

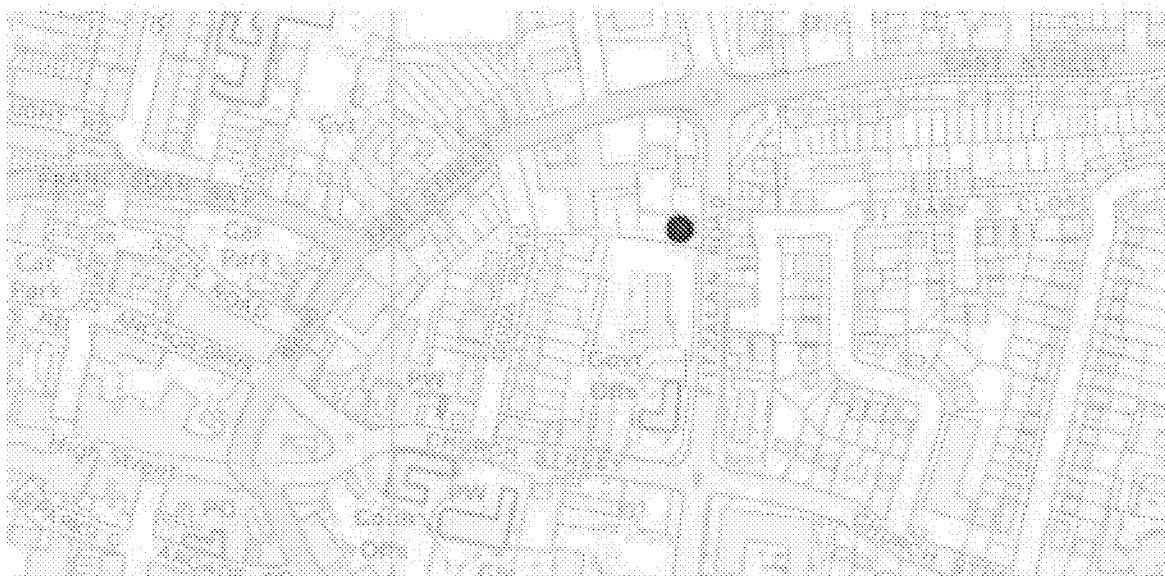


Figure 8 Excerpt from Appendix H of SFRA Historic Flooding Records

- 6.5.3. The site rises gently from the street (north) toward the rear (south). The rear of the site was previously hard surfaced in concrete. Following the change of use, this have been removed and replaced with paving, with further areas to be enhanced by planting and the inclusion of green roofs to the two proposed ancillary outbuildings. This change to the level of hard surfacing will allow for a net improvement to surface water drainage, by allowing more rainwater to drain naturally into the ground rather than be immediately discharged into the sewer.

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6.5.4. In respect of uses, the two outbuildings are for ancillary communal and therapy rooms, with no habitable accommodation proposed. This approach is in conformity with Environment Agency's recommendations.

6.6. Residential Amenity

6.6.1. Policy D SP1 of the Local Plan indicates planning permission will be granted for schemes displaying high quality design and layout. It further indicates development will be permitted if it takes into account impact on adjoining occupiers, land, use or property. In this case, it is considered that the proposed development for C2 Use Class would be wholly acceptable in terms of impact on neighbouring uses and occupiers given the largely residential character of this area, including future occupiers of residential properties to the rear.

6.6.2. In terms of the proposed smaller outbuilding to the rear of 22 East Street, this would be largely screened by a tall boundary wall to the rear, and boundary wall with trellis to the east. The larger of the two proposed buildings would be screened, in part, by a boundary wall to the rear, adjoin the new residential development. This building will be off-set from this boundary by approximately 1.1m. The existing boundary wall is illustrated by the dashed line on the image in Figure 9 below.



Figure 9 South Elevation

6.6.3. Furthermore, the windows within this southern elevation serve a toilet and office, and therefore these could be obscure glazed, and controlled by planning condition. The separation distance between these ancillary outbuildings and the nearest residential properties is considered acceptable.

6.7. Parking and Services

6.7.1. As established as part of the recent change of use application, the main entrance between 18/20 and 22 East Street has been retained and leads through to parking at the rear. The previous secondary access adjacent the Flintstone Centre has been closed and now provides for secure cycle parking and refuse storage.

6.7.2. The site is located within a highly sustainable location, and therefore it is most likely that occupiers will walk or cycle to the site, or to access local services and amenities. The proposed ancillary outbuildings will not give rise to additional service users.

6.7.3. The Transport Report which accompanied the change of use application advised that the development would require 5no car parking spaces for staff and visitors together with 1no disabled parking space, and this has been provided onsite in the form of dedicated vehicle bays.

7. Conclusions

- 7.1. The site is situated in a highly sustainable location where national and local policy seeks to direct development. The site recently received planning permission for a change of use to Private Detox and Rehabilitation Clinic, and this has been implemented and is operational. The two proposed ancillary outbuildings will provide necessary private therapy and communal space detached from the habitable accommodation.
- 7.2. The proposed outbuildings have been carefully designed to respond to the sensitive location within a conservation area and within the setting of locally listed buildings. The proposed buildings would preserve and enhance this part of East Street Conservation Area and similarly would not result in any adverse impact on the locally listed buildings.
- 7.3. Off-street parking is already provided on site and the existing vehicular access point will be retained.
- 7.4. In terms of flood risk, the development would not result in any increase to service users. The outbuildings incorporate green roofs together with areas of reduced hardstanding and provision of compensatory planting thereby improving the degree of natural permeability and reduction to the amount of surface water run-off.
- 7.5. It is contended that the development fully accords with national and local policies, including Littlehampton Neighbourhood Plan.

Appendix 1 – Elysium Healthcare and Worthing Medical Group

Dr Tim Rank

The Brighton & Hove Clinic
14-18 New Church Road
Hove
East Sussex
BN3 4FH

19th November 2018

To Whom it May Concern

Re: Lovelong House

I am writing in my capacity as a Consultant Psychiatrist who has worked in Sussex for 20 years. Lovelong House is a much needed addition to local healthcare as there is a clear shortage of facilities which can effectively help people who have problems with alcohol. I am confident that Lovelong house will offer high quality evidence based care, and at times this care will be lifesaving.

Alcohol misuse is the biggest risk factor for death, ill health and disability amongst 15-49 year olds in the UK, and the fifth biggest risk factor across all ages. There is a strong link between alcohol and crime, approximately half of all violent offenders are under the influence of alcohol and alcohol related crime in the UK is estimated to cost £13bn per year.

Only about 15% of dependent drinkers are in treatment. Around 61% of people seeking treatment complete their treatment successfully.

The above figures clearly show that there is a significant need for effective alcohol treatment centres, both to reduce ill health and reduce crime. Lovelong house will also provide employment for approximately 20 people and I would therefore urge the local planning department to approve the application.

Yours faithfully,



Worthing Medical Group
23 Shelley Road
Worthing
BN11 4BS

29/11/18

To Whom It May Concern,

RE: Lovelong House

My name is Dr Jesseca Bannerman. I am a GP in Worthing, who along with 2 other colleagues are planning to provide medical services to residents at Lovelong House. Having previously been a GP at Arun Medical Group for 3 years, I am personally aware of the needs of the population in Littlehampton. I feel that this service would be greatly beneficial for residents, initially providing inpatient alcohol detox, but also with a view to helping achieve long term sobriety with community therapy, as well as the vision that Jenny Ratcliff and Gary Long have to provide employment and a future for people who have struggled with addiction.

In terms of my clinical role, I and the other GPs plan to provide an initial assessment, ensuring that residents are medically fit, and to help provide a detox regime. Dr Tim Rank, a consultant psychiatrist, is also on board, and will be able to provide psychiatric assessment and treatment for patients. This joint working will be a tremendous asset for the local population, as psychiatric assessment is extremely difficult to access when there is co-existing alcohol misuse. All doctors involved in this have previously worked in addiction services, with Dr Rank having worked at the Priory, and the GP team also working at Recovery Lighthouse, an inpatient detox facility in Worthing.

Having had personal experience, Jenny and Gary are extremely committed and passionate about this project, and we are all excited to work with them in Littlehampton

Yours faithfully,

Sent unsigned to avoid delay

Dr Jesseca Bannerman
GMC: 6163805
Salaried GP
Worthing Medical Group