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Planning and Development
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Your ref: PP-09963590

25th August 2021

Dear Sir/ Madam,

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION FOR A TWO STOREY OFFICE BUILDING (USE CLASS E)

SITE ADDRESS: LAND AT UNIT 4, HAWTHORN ROAD, LITTLEHAMPTON

This application is submitted on behalf of our client, Envision Contracting Ltd, and seeks planning permission for the construction of a two-storey office building (Use Class E) at land adjoining Unit 4, Hawthorn Road, Littlehampton.

The formal description for which planning permission is being sought is as follows;

"The construction of a two-storey office building (Use Class E)".

The application has been submitted via Planning Portal (Ref: PP-09963590) and comprises the following:

- This Covering Letter;
- Application Form;
- CIL Form;
- Design and Access Statement;
- Location Plan (Ref: SLP01) (scale: 1:1250@A3);
- Existing Block Plan (Ref: BP01) (scale: 1:500@A3);
- Proposed Block Plan (Ref: BP01) (Scale: 1:500 @ A3);
- Proposed Floor Plans (Ref: P01) (scale: 1:100@A2);
- Proposed Elevations (Ref: P02) (Scale: 1:100 @A2);
- Proposed North and South Elevations (Ref: P03) (Scale: 1:100 @A2);
- Proposed East and West Elevations (Ref: P04) (Scale: 1:100 @A2);
- Transport and Parking Note (prepared by RGP); and
- Surface Water Drainage Strategy (prepared by UK Flood Risk Consultants).

The statutory application fee [REDACTED] has been paid via Planning portal.

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Site and Surrounding Area

The site is located within the authority boundary of Arun District Council and is approximately 1.7km north of Littlehampton town centre. It is located along Hawthorn Road on the northern side of the A 259 on the westerly approach to Littlehampton. Hawthorn Road is accessed off the roundabout at the A259/A284 junction and serves a small Business Park.

The site comprises an existing property that was previously within Use Class E (Offices) but had lain vacant since March 2018. This property has since had prior approval for the conversion to residential to provide 30 residential units. The site has a large parking area to the front and rear, which has provision for up to 50 vehicles in total. The proposed office building will be located on the large parking area to the front of the existing property.

Vehicle access is from the south of Hawthorn Road which takes you to front car park and a second driveway down the eastern side leads to the rear car parking area. Pedestrian access to the site is along Hawthorn Road, with access to the building at the front and the rear.

The surrounding Area

The properties in the immediate surrounding area are predominately commercial, including a variety of industrial units, with a Morrisons Food Store to the east. Directly opposite the site, over the A259, lies a large residential area, as well as further to the north and to the east.

Hawthorn Road is a 'no through road' and takes access from the wider highway network via a 5-arm roundabout junction with the A284 (travelling north/south) and the A259 (travelling east/west), this junction is the north-western arm of the roundabout. The road divides at the south-eastern extent after the roundabout to serve the Morrisons Food Store.

The closest bus stops to the site are the Courtwick Road bus stop which is located a 450m walk to the south of the property and Seaton Road, 500m to the north. A number of regular local bus services are available within walking distance of the property, enabling prospective tenants to travel to and from the site via bus.

The nearest National Rail Station to the site is Littlehampton, which is located approximately 1.7km south of the site. The site has convenient access to local amenities, including retail, employment and leisure opportunities.

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Planning History

Through undertaking an online planning history search, it can be confirmed that the existing site benefits from lawful office use by virtue of a 1983 planning permission (Ref: LU/154/83). Following this, there have been two permissions for portacabins within the car park to support the office use in 2012 (ref: LU/30/12). It is uncertain whether the portacabins were ever erected on site, but the site does not currently contain any such portacabins and solely comprises the existing building and large parking area to the front and rear of the property.

In 2018 a prior approval application was submitted for the proposed change of use from office (B1(a)) into 10 residential dwellings (Ref: LU/176/18/PD). The Environmental Health Officer recommended the refusal of this application stating:

“Noise from plant, machinery, deliveries, and ancillary activities from surrounding commercial uses may adversely impact the amenity of future occupiers of the proposed development. Noise from the A259 may also adversely impact the amenity of future occupiers of the proposed development. No information on noise exposure is provided within the application.”

There was no Acoustics Report submitted with this application and as such, the case officer would have been within their rights to refuse the prior approval application on this basis. There were no grounds for objection in relation to highways. Instead, the application was withdrawn on the 6th August for an acoustic report to be commissioned.

A further prior approval application was then submitted by the current applicant for the proposed change of use from office (Use Class B1(a)) to dwellinghouses (Use Class C3) to provide 30 self-contained flats (14 studios and 16 one-bed flats) (ref: LU/286/18/PD). This application did include an acoustic assessment, however it was refused on 5th December 2018. The sole reason for the refusal was due to noise.

In January 2019 a revised prior approval application was submitted to address the acoustic concerns raised (Ref: LU/7/19/PD). The 2019 Prior Approval Application was a resubmission of a previous prior approval application for Unit 4 Hawthorn Road to provide 30 self-contained flats in September 2018. Further work has been undertaken by the Applicant's design team, in a bid to address the previous reason for refusal. However, this resubmission was refused by the Council on the 18th March due to the impacts of noise from commercial premises which the LPA considered to have the potential to adversely affect the amenity of future residential occupiers. This refusal was appealed by the applicant and subsequently allowed at appeal on the 25th September 2019 (Ref: APP/C3810/W/19/3230).

Once the prior approval has been implemented, it is intended that the residential units will be let by the Local Authority Housing Department. In order for the Local Authority to manage these properties, they require an on-site office to service the residential units. Therefore, an office building is now required on site.

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Proposal

This application seeks planning permission for the provision of a two-storey office development (Use Class E) on the land at Unit 4, Hawthorn Road. The proposed office development will provide 341m² of office floorspace over the two floors including ancillary storage.

The proposed office building will have a total height of approximately 7.4m and will be constructed of brick with two large rows of windows on the ground and first floor. The building will have a flat roof which will be constructed of pitched metal roofing sheets. A double door entrance is proposed on the east elevation for access into the proposed building and a roller shutter door is also proposed.

The building has been designed to compliment the design of the existing building on the site and is therefore in keeping with the surrounding area.

Vehicle access will remain unchanged and will be made from the single vehicular access, located at the south eastern corner of the site. This access serves all of the parking afforded to the site, which is located to the front and rear of the main building via an internal access road which runs along the eastern boundary of the site.

Planning Policy Framework

This section sets out the planning policy framework of relevance to the application proposal. Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that in making any determination under Planning Acts, regard is to be had to the Development Plan, and the determination must be made in accordance with that plan, unless material consideration indicates otherwise.

The Statutory Development Plan is as follows:

- Arun Local Plan 2011-2031 (2018);
- Arun Local Plan Policies Map (2018); and
- Littlehampton Neighbourhood Plan (2014).

In addition to the Development Plan, the following are material considerations in this assessment:

- ❖ National Planning Policy Framework (2021); and
- ❖ Local Supplementary Planning Documents and Guidance.

National Policy

National Planning Policy Framework (NPPF) (July 2021)

The National Planning Policy Framework was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019. The new NPPF was adopted following the adoption of the Arun Local Plan (2018). In such cases, Annex 1, paragraph 213 advises that existing policies should not necessarily be considered out-of-date and that due weight should be given to them, according to their degree of consistency with this Framework; the closer the policies in the plan to the policies in the Framework, the greater the weight may be given. This should be borne in mind when considering the following Policy Review.

Presumption in Favour of Sustainable Development

The NPPF sets out the Government's presumption in favour of sustainable development at paragraph 11. The Government's presumption in favour of sustainable development. For decision taking, this means:

- "c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - I. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Paragraph 8 identifies that the 'economic objective' of planning in the context of sustainable development is to contribute to building a 'strong, responsive and competitive economy' and to support growth, innovation and improved productivity.

Economy

The revised NPPF seeks to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Paragraph 81). Furthermore, Paragraph 81 also states that decisions should help create the conditions in which businesses can invest, expand and adapt.

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The NPPF also supports the effective use of land at paragraph 123, by stating that there should be a positive approach to applications for an alternative use of land.

Effective Use of Land

Paragraph 119 promotes the effective use of land and encourages the use of previously developed or brownfield land, as much as possible.

In this regard, substantial weight is given to the value of using suitable brownfield land for development and the development of underutilised buildings, at paragraph 122. In order to support this, paragraph 120 requires policies and decisions to reflect changes in demand.

Design

Paragraph 126 emphasises the importance of high-quality design in making better places for people, stating that it is a key part of sustainable development and indivisible from good planning.

Paragraph 130 sets out several considerations to incorporate in developments, including the functioning of a site and surrounding area, visual appeal, sympathetic to local character and history, sense of place, inclusive and accessible place, and mixed developments (where appropriate). Paragraph 130 criterion d emphasises that developments should create “*attractive, welcoming and distinctive places to live, work and visit.*”

Arun Local Plan

The Arun Local Plan 2011-2031 was adopted on the 18th July 2018 and comprises the written statement and supporting policy maps. The plan sets out the spatial vision, objectives and sustainable strategy for delivering needed growth of the District over the period 2011-2031.

Policy SDSP2 ‘Built-up Area Boundary’ states that development should be focused within built up areas such as town centres.

Policy EMP SP1 ‘Strategic Employment Growth’ states that the provision of land to accommodate employment needs should be supported and furthermore, the Policy also supports sustainable growth of the districts economy.

Policy DSP1 ‘Design’ encourages development proposals to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.

Littlehampton Neighbourhood Plan

The Littlehampton Neighbourhood Plan sets out the specific planning policy proposals for the parish with a view to the document becoming made as part of the Development Plan.

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Policy 7 'Business Land Allocations' allocates vacant and under-used land at Hawthorn Road for business use, office use has been deemed appropriate in this location.

Supplementary Planning Documents

Arun Parking Standards 2020

The Arun District Parking Standards takes standards and evidence produced and consulted on by the County Council, along with its own documentation and tailored it to make it applicable to the situation within Arun District. The Parking Standards SPD relates to the amount of parking, cycle and electric vehicle charging points expected to be provided within development of differing sizes. The Arun District Council Parking Standards January 2020 SPD was officially adopted at the Full Council meeting of 15th January 2020.

The Parking Standards require one car parking space per 30m² of office floorspace and 1 cycle space per 150m² of office floorspace and 1 space per 500m² for visitors.

Planning Assessment

Principle in Land Use Terms

The Application Site comprises an existing office building with a large parking area to the front and rear. The Site has lain vacant since March 2018 but has since had prior approval for the conversion to 30 residential units which is to be intended to be let by the Local Authority Housing Department. In order for the Local Authority to manage these properties, they require an on-site office to service the residential units. Therefore, an office building is now required on the surplus car parking to the front of the site.

At the heart of sustainable development is the re-use of existing brownfield land and the development of underutilised buildings, as identified in the NPPF. The application site comprises an existing building with associated car parking and the proposed office building constitutes sustainable development in re-using existing employment land.

The application site comprises an existing employment site and although the existing building has prior approval for residential use, the site has historically been in office use. Policy EMP SP1 'Strategic Employment Growth' states that the provision of land to accommodate employment needs should be supported and therefore actively encourages the redevelopment of suitably located existing employment premises. The proposed new office building is therefore acceptable in policy terms and will support the functioning of the main building when converted into residential units. Furthermore, Policy 7 'Business Land Allocations' of the Littlehampton Neighbourhood Plan allocates vacant and under-used land at Hawthorn Road for business use and emphasises that office floorspace has been deemed appropriate in this location.

The site is in the built-up area in a highly sustainable location with potential for trips to be made on foot, by cycle or by bus. Given the site is located within the built-up area boundary where development is acceptable in principle, the proposal is wholly in accordance with policy SD SP2 of the Arun Local Plan.

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In light of the above, the principle of providing additional office floorspace is acceptable in land use terms.

Design

In terms of design, we understand the importance of a high-quality scheme which reflects the character of the surrounding area. It is noteworthy that the scheme has been carefully conceived and designed to appear visually cohesive with surrounding properties and in particular the existing building on the site.

The proposed two-storey office building will be in keeping with the existing property on site through matching the existing materials of the single storey building, ensuring it would have no detrimental harm on the established character of the existing building or its locality.

Policy D SP1 of the Arun Local Plan requires all development proposals to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. The proposed office development reflects the architectural character and scale of the surrounding buildings and has been designed using a similar material palette to the existing building on site.

This proposal is in keeping with the character and complements the appearance of the development as a whole by respecting the scale of the existing building and contributes to a sense of cohesion and unity.

Given the above, the design of the proposed office building is considered to be acceptable and to comply with the NPPF and Policy DSP1 of Arun Local Plan.

Transport

A Transport and Parking Note dated April 2021 has been prepared by RPG Transport Planning and Infrastructure Design Consultants and accompanies this application.

Although the proposal will result in the loss of car parking spaces on site, the Parking Note highlights that the wider site would retain at least 36 parking spaces on site, however there is scope for additional parking for 8 cars available opposite the parking bays aligned parallel to the aisle. Overall, a total of 44 vehicles could be parked on site, however with a view to reducing use of the private car only 36 bays would be formally marked out on site.

The total use of 36 formal unallocated bays and 44 total unallocated bays on the site would support the peaks in demand from the consented 30 residential units the additional officer floorspace proposed, without leading to parking being displaced onto the local highway network and would be in accordance with Arun District Council's Parking Standards.

As such, the proposals are acceptable on highways and parking grounds and therefore, there are no highways and transportation reasons why the provision of an office building would not be acceptable.



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Conclusion

This application seeks planning permission for the provision of a two-storey office building to accommodate the Local Housing Authority who will be managing the recently approved residential units at Unit 4 Hawthorn Road.

The principle of office use within this location, has already been established by of the previous use of the site and the existing commercial developments within the surrounding area. The site evidently represents a brownfield site and is a suitable and sustainable location for office development. This office development application is thereby considered to be acceptable, in principle.

In light of the above, we trust you can consider this application favourably and we look forward to receiving confirmation that the application has been validated. In the meantime, if you require any further information or clarification please contact Victoria Bennion [REDACTED]

Yours faithfully,

Victoria Bennion

Senior Planning Consultant on behalf of Jones Lang LaSalle Ltd