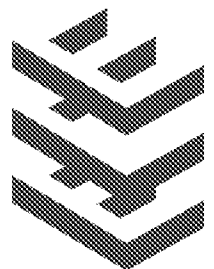


Planning and Heritage Statement

18 – 22 East Street, Littlehampton

November 2018



ECE Planning

Project Name: 18 – 22 East Street, Littlehampton

Location 18 – 22 East Street, Littlehampton, BN17 6AW

Client: Love Long Ltd

File Reference: P1571

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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:

'Change of Use from Doctors Surgery (D1 Use Class) to 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 in addition to the detailed technical studies prepared in support of this application.
- 1.4. This Planning Statement is accompanied by the following documents:

Planning Application Forms and Notices
Plans & Elevations
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 situated within East Street Conservation Area, and is located within the built-up area boundary of Littlehampton. The site is 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.

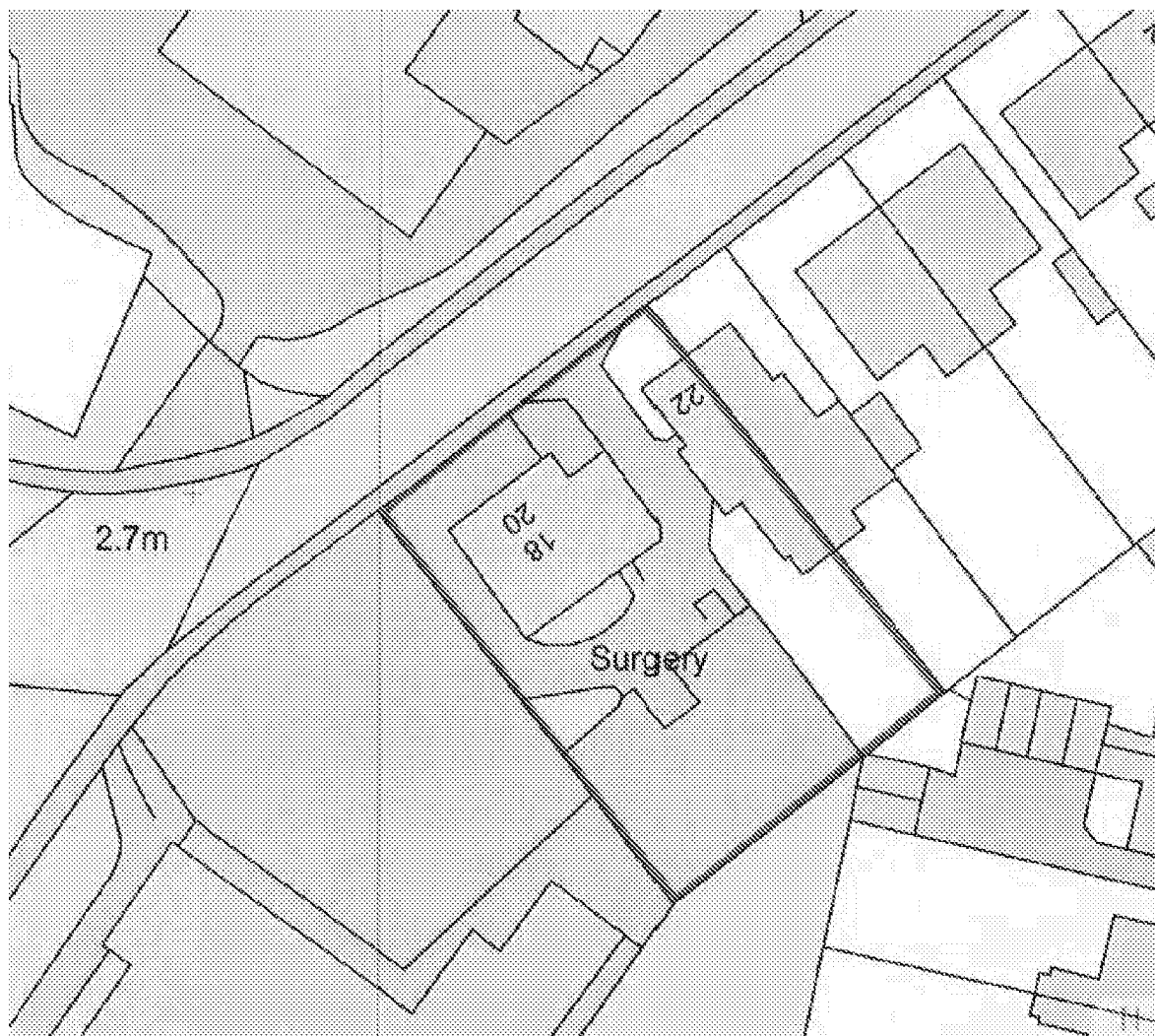
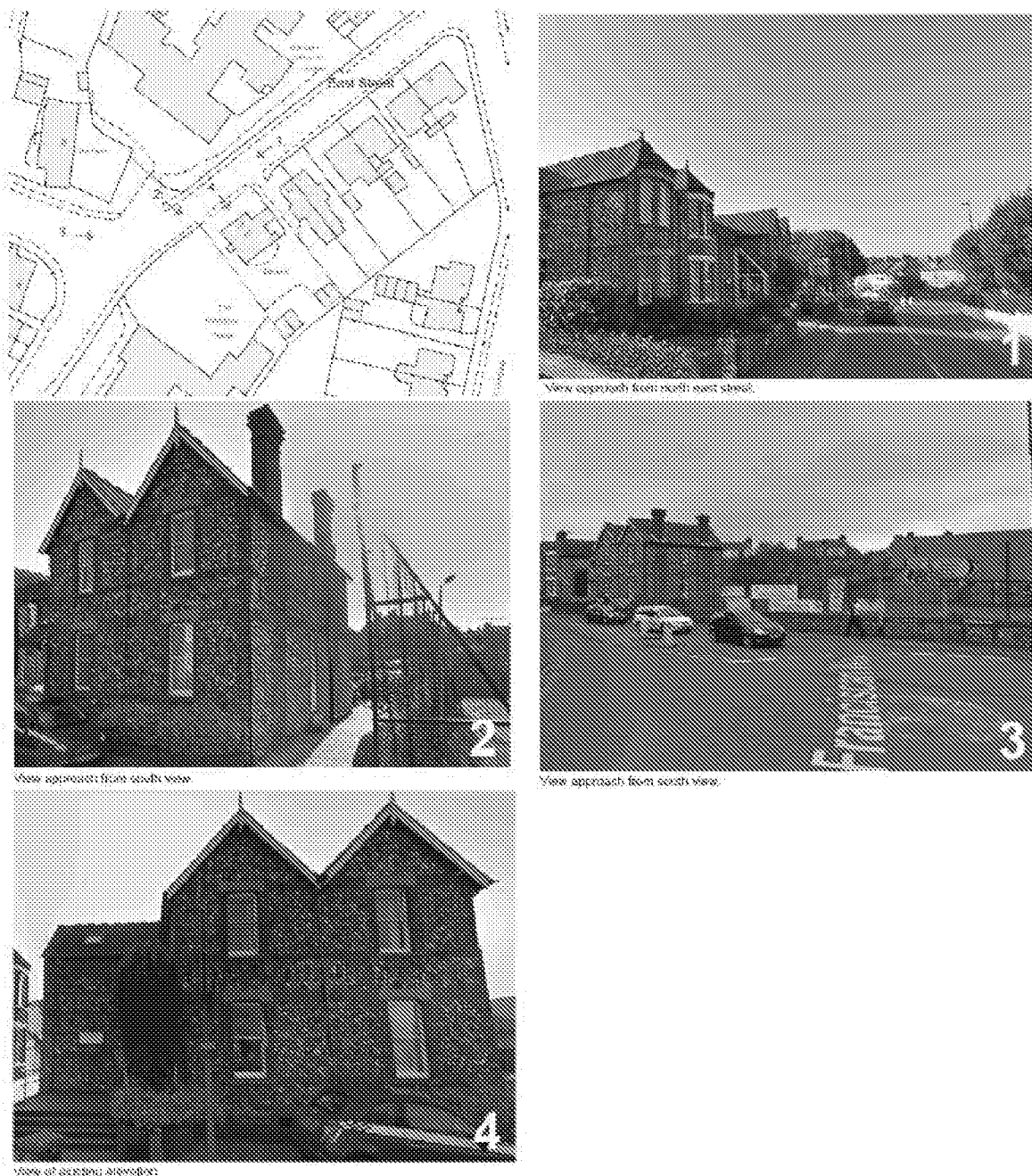


Figure 1 The Site Location

- 2.2. The site has a slight incline, rising from the north (front) to the rear (south) of the site. The buildings are not statutorily listed but are noted as being '*Buildings of Character*' within the adopted Local Plan (policy HER DM2).
- 2.3. The former doctors surgery (D1 Use Class) occupies two adjacent properties, 18 - 22 East Street. 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.



- 2.4. A wide and deep stepped entrance has been created to the main entrance of the former doctors surgery (18/20 East Street) at the eastern side of the front elevation with the western side given over to parking for one vehicle. The rear gardens to both of these properties have at some point been covered with concrete hardstanding to create further parking spaces ancillary to the surgery.
- 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.
- 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.

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/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

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

18/20 East Street

- 3.4. **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

- 3.5. **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

- 3.6. **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

- 3.7. **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

- 3.8. The following applications are relevant to the site located to the rear of 18/20 East Street at the Old Dairy.

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

- 3.10. **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

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

4. The Proposal

- 4.1. The proposed development is for the change of use of the both properties from a former doctor's surgery (D1 Use Class) to create a *Private Detox and Rehabilitation Clinic (C2 Use Class)*
- 4.2. The previous application **LU/65/17/PL** was granted planning permission to convert number 18/20 East Street to 1no. 4-bedroom single dwellinghouse and number 22 East Street to 1no. 3-bedroom dwellinghouse. That planning permission was not implemented in full, such that neither of the buildings has been occupied for residential purposes, and as such the change of use is assessed against the former doctor's surgery and not residential.
- 4.3. The proposed private detox and rehabilitation clinic will be run by a professional team of staff, comprising the following:
- Clinic Manager
 - Nursing Manager - possibly residential
 - +5 Nursing Staff working 12 hour shifts
 - 2 admin/office staff
 - Therapy Manager
 - +3 therapists/support workers
 - 1 cook
 - 1 housekeeper
 - 1 cleaning assistant
- 4.4. Number 18-20 East Street will provide the following accommodation: At ground floor it is proposed to have kitchen, living and dining areas together with an Administration/Staff office and high dependency bedroom which will have 24hr supervision. At first floor, the accommodation provides 4no ensuite bedrooms which can either be used as single or twin rooms.
- 4.5. Number 22 East Street will provide primarily office functions at ground floor with staff accommodation at first floor together with two further bedrooms for clients, if necessary.
- 4.6. No physical external alterations are proposed as part of this application.

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 July 2018. 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 the buildings as the buildings will remain architecturally the same. The proposal is only for the change of use.
- 5.2.7. Overall, it is concluded that the proposals comply fully with the policy objectives of the National Planning Policy Framework 2018.

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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 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.

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

- 5.4.6. **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.

- 5.4.7. **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.

- 5.4.8. **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 6: Residential development involving loss of community facilities. This policy sets a presumption against development which would result in loss of community facilities. The existing doctor's surgery buildings were vacant at the time of the previous application and determined to be surplus to NHS requirement. This was supported by a statement from the NHS (Appendix A) to this effect. As such, whilst the proposed development would not result in residential development (C3 use class) it would provide a residential institution where there is an element of care (C2 use class).
- 5.5.4. 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.
- 5.6. **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 a change of use from D1 to C2 Use Class is appropriate subject to satisfying all other relevant considerations, and in particular the 'loss of community facilities'.
- 6.2.3. As noted earlier in this this Statement, the loss of the former doctors surgery has already been accepted by the Council pursuant to planning permission **LU/65/17/PL**. This previous planning permission has not been implemented in full such that the buildings have not been occupied for residential purposes, and therefore the proposal should be considered against the 'loss' of health care services rather than the 'loss' of residential units. In this regard, the primary consideration is whether the proposed C2 Use Class is acceptable in this location.
- 6.2.4. Planning permission **LU/65/17/PL** proposed to create 2no self-contained residential properties, whilst the current proposes to use these two buildings for a Private Detox and Rehabilitation Clinic.
- 6.2.5. This proposed development will provide short-term residential accommodation with an element of care, and will be run by a professional team of staff, including a Clinic Manager, Nursing Manager, Nursing Staff together with Therapy Manager and Staff. This application is supported by a statement from Dr Tim Rank a Consultant Psychiatrist based at The Brighton & Hove Clinic together with a further letter of support from Dr Jesseca Bannerman GP with Worthing Medical Group, both advising in unequivocal terms that this proposed use is a much needed addition to the local healthcare with a clear shortage of similar such facilities in this area.
- 6.2.6. It is clear that this C2 Use would be a positive contribution to the healthcare provision and utilising a former doctors surgery. This is considered to be an effective and efficient use of land within this highly sustainable location and is supported in policy terms.
- 6.2.7. The internal layout of these buildings lend themselves to the proposed use which allows for residential accommodation with care facilities.

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6.3. Heritage Environment

- 6.3.1. The site is located within East Street Conservation Area (Figure 3) 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.

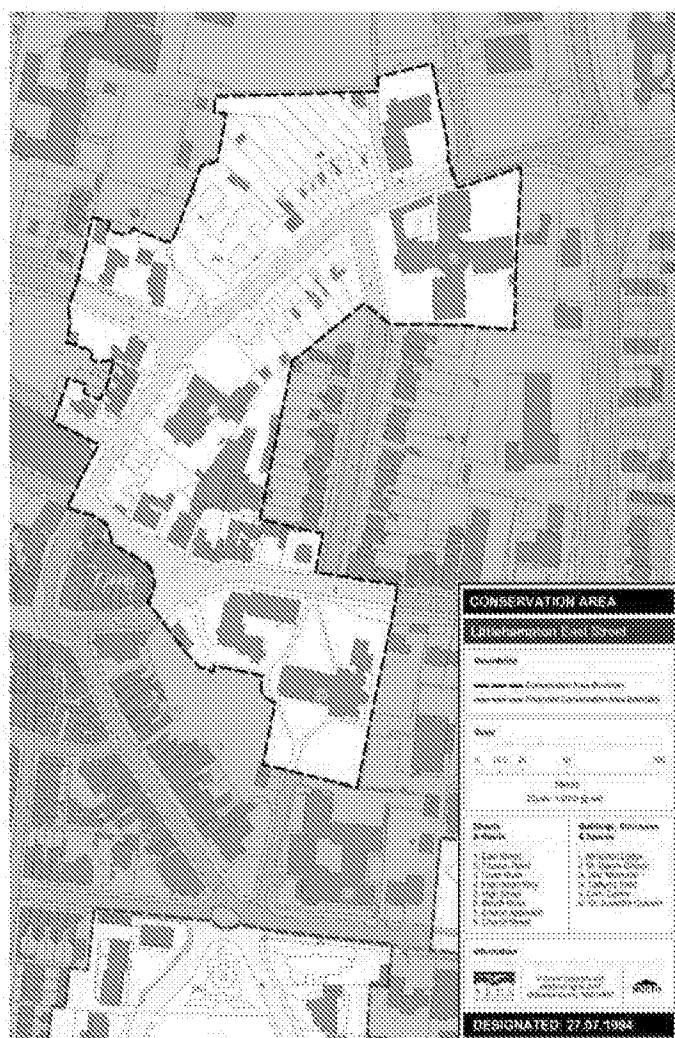


Figure 3 East Street Conservation Area

- 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 change of use of two buildings previously used as a doctors surgery and which does not propose any physical external changes would represent acceptable development and would not have any undue or adverse impact on this designated Conservation Area.
- 6.3.3. The proposal would provide the opportunity to reinstate, in part, a garden area to the rear of both properties and reduce the extent of car parking around the building which forms an enhancement within the Conservation Area in accordance with policy.

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- 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 development, as already noted, does not propose any physical external alterations, and would provide the opportunity to improve the setting of these 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.

6.4. Flood Risk Assessment

- 6.4.1. 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.
- 6.4.2. 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 is illustrated in Figure 4 below, which is an excerpt from Appendix H of the Arun District SFRA Historic Flooding Records.



Figure 4 Excerpt from Appendix H of SFRA Historic Flooding Records

- 6.4.3. The site rises gently from the street (north) toward the rear (south). The rear of the site is currently largely hard surfaced in concrete. Following the change of use it is proposed that the hard standing could be partly removed and returned to an amenity area, including areas of soft landscaping, whilst retaining a degree of parking for staff and visitors. This will allow more rainwater to drain naturally into the ground rather than be immediately discharged into the sewer.

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6.4.4. In respect of uses, the ground floors will accommodate largely non-habitable spaces, with the exception of one high dependency bedroom, however it is important to note that this room will benefit from 24hr supervision. This approach to the location of habitable accommodation is in general conformity with Environment Agency's recommendations and was considered acceptable for the purposes of new residential development to the rear at The Old Diary, Church Street.

6.4.5. The proposed development seeks a Change of Use with no physical alterations to the buildings. It is contended that should further details be necessary, these can be appropriately secured by condition.

6.5. Residential Amenity

6.5.1. 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.

6.5.2. There would be an approximate 30m back-to-back distance between number 18/20 East Street and the approved dwellings at the Old Dairy, Church Street. This separation distance between properties was considered acceptable as part of the consideration of this adjoining extant planning permission.

6.5.3. Some degree of noise would likely arise from service users of the adjacent Flintstone Centre, however this is an established use and would be limited to day-time hours. Equally, there may be some degree of noise associated with the proposed use, and which will not be dissimilar to previous use of the site for D2 purposes.

6.6. Parking and Services

6.6.1. Both properties benefit from existing vehicular access points and parking. It is proposed that the main entrance between the properties would be retained, whilst the secondary access adjacent the Flintstone Centre would likely be closed.

6.6.2. 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.

6.6.3. The accompanying Transport Report advises that the development would require 5no car parking spaces for staff and visitors together with 1no disabled parking space, which is achievable on site. Additionally, 8no cycle spaces are required, and again this can be accommodated on site with secure covered sheds. These requirements can be controlled by planning condition.

6.6.4. As is clear from the accompanying site and block plans, both of these existing properties benefit from large amenity areas which would easily accommodate appropriate storage areas for refuse and recycling bins.

7. Conclusions

- 7.1. The site is situated in a highly sustainable location where national and local policy seeks to direct development. The former doctors surgery was proven to be surplus to NHS requirements and its loss accepted previously by the Council as acceptable. The provision of a Private Detox and Rehabilitation Clinic in place of this former doctors surgery accords with local policy which seeks to direct development within the built-up area and which provides opportunities to promote healthy communities and reduce health inequalities.
- 7.2. The proposed change of use to Private Clinic would provide much needed health services within the South, and which is fully supported by Dr Tim Rank, Consultant Psychiatrist and Dr Jesseca Bannerman, GP.
- 7.3. The proposed change of use would preserve and enhance this part of East Street Conservation Area. Similarly, the proposal would not result in any adverse impact on the locally listed buildings.
- 7.4. Off-street parking is already provided on site and the existing vehicular access points will be retained. The site can readily accommodate areas for refuse and recycling storage.
- 7.5. In terms of flood risk, the development would not result in higher vulnerability to future users or increase flood risk elsewhere. If necessary, details pertaining to future drainage strategy can be secured by condition.
- 7.6. It is contended that the development fully accords with national and local policies and would also accord with the draft policies within the emerging local plan.