
Former Waitrose, Avon Road, Littlehampton

Planning Statement

Prepared by Barton Willmore on Behalf of Ropemaker Properties Ltd

December 2018

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a full planning application for the following development at the former Waitrose, Avon Road, Littlehampton, BN17 6AT (the 'Application Site' or 'Site'):

'Full planning application for redevelopment comprising 83 residential units (Use Class C3) and 158.5 sqm flexible retail floorspace GIA (Use Classes A1 and/or A2 and/or A3 and/or D1) together with the provision of car and cycle parking, landscaping and associated works (including demolition of existing buildings).'

- 1.2 The submitted proposals have been prepared having regard to the pre-application advice provided by Arun District Council.

Planning Application Pack

- 1.3 The submission is accompanied by the following documents, in accordance with the Council's validation requirements and pre-application advice:

- Cover letter, prepared by Barton Willmore;
- Application forms and Certificates, duly completed by Barton Willmore;
- Application drawings, prepared by Pod Architects;
- Design and Access Statement (December 2018), prepared by Pod Architects;
- Planning Statement (December 2018), prepared by Barton Willmore;
- Heritage Statement (December 2018), prepared by JLL;
- Biodiversity Checklist, duly completed by Waterman Infrastructure & Environment Ltd;
- Ecological Impact Assessment (November 2018), prepared by Waterman Infrastructure & Environment Ltd;
- Bat Survey (December 2018), prepared by Urban Edge Environmental Consulting;
- Flood Risk Assessment and Drainage Strategy (December 2018), prepared by Waterman Infrastructure & Environment Ltd;
- Transport Statement (December 2018), prepared by Fore Consulting;
- Framework Residential Travel Plan (December 2018), prepared by Fore Consulting;
- Lighting Statement (December 2018), prepared by EB7;

- Energy and Renewable Strategy prepared by Hoare Lea (November 2018); and
- Noise Assessment (December 2018), prepared by Hann Tucker.

2.0 SITE CONTEXT AND PLANNING HISTORY

Site Context and Description

- 2.1 The Application Site is located within the town of Littlehampton, within the administrative boundary of Arun District Council (ADC), in West Sussex.
- 2.2 The Site extends to approximately 0.6ha and comprises a vacant retail unit (Use Class A1) (formally occupied by Waitrose) situated to the south of Avon Road, and an associated car park located to the north of Avon Road. The Site is bounded by Franciscan Way to the north; East Street to the east; Anchor Springs to the south; and by a motor works and Carpetright unit to the west.
- 2.3 The Site is located within the town centre in close proximity to the pedestrianised High Street which is situated to the south. High Street is characterised by a range of retail uses within a mix of building styles of differing height and varying roof types. By contrast the surrounding area to the north and east is predominantly residential. To the west, beyond the retail/commercial uses bounding the site lies the St Martin's Car Park which is owned and operated by ADC.
- 2.4 The Site is located within the Town Centre Boundary and wider Littlehampton Economic Growth Area (LEGA), which is aimed at accommodating development which reinforces the role of Littlehampton town centre. The frontage of the former Waitrose unit is defined as Secondary Shopping Frontage. Directly to the east of the Site, lies the East Street Conservation Area.
- 2.5 The south eastern part of the Site lies within Flood Zones 2 and 3 and therefore flood risk is an important consideration in the design of the proposals.

Planning History

- 2.6 There are no previous applications on the Site considered of relevance to this application.

Pre-application discussions

- 2.7 Pre-application advice was originally sought in March 2016 for the mixed-use redevelopment of the Site to provide 56 residential units (Use Class C3), 2No. flexible retail units (Use Class A1 and/or A3) and a 72 bed care home (User Class C2).

2.8 The Council responded with formal written advice dated 6th June 2016, which was followed by a meeting with Officers on 6th July 2016 to discuss the advice in more detail. This highlighted the following key matters:

- The proposed uses including residential use, care home and retail were acceptable;
- Redevelopment of the Site was welcomed as the conversion of the existing building was unlikely to satisfy design aspirations for new development in this location;
- Introduction of a new active retail frontage along East Street (that would improve the character of the frontage abutting the Conservation Area) was supported.
- The proposed scale and massing of the proposed new development was considered out of keeping with the adjoining 'domestic scale' and the mainly pitched roof buildings and the proposals would benefit from greater vertical visual separation;
- Impact on heritage assets as the proposal fails to preserve or enhance the adjacent conservation area; and
- The proposals lacked provision of sufficient landscaping and amenity/open space.

2.9 Revised proposals were presented to the Council in February 2017 as part of on-going pre-application discussions. These involved a marked reduction in the scale of development proposed and added interest into elevational treatments to reduce massing alongside the introduction of landscaping and a communal amenity area at street level. The proposals also incorporated pitched roofs to reflect the surrounding townscape. The care home use was omitted (the reduction in scale having compromised viability); and replaced with residential. In all, the revised proposals comprised 94 residential units (across two residential blocks), two flexible retail units (Class A1-A3 or D1) (156 sqm) and associated landscaping and open space.

2.10 Further design changes were presented to the Council in September 2017 and the Council responded with formal written advice dated 10th November 2017. This continued to welcome the proposed demolition of the former Waitrose building but maintained concerns as to the scale, design and fenestration, principally of the northern building.

2.11 More detailed drawings were subsequently presented to the Council at a meeting with Officers on 13th February 2018. This included an indication of materials and façade articulation, push backs at ground and roof level and additional areas of soft landscaping. It was noted by Officers that the design changes were an improvement on previous iterations. However, there remained concerns about the northern building in terms of its height and prominence over Franciscan Way.

2.12 This meeting was followed by further written advice (email dated 30th April 2018) which highlighted the following matters / requirements:

- The almost entirely residential scheme will result in the loss of an employment site for the town centre;
- The proposed mix of 1 and 2 bed apartments built to minimum space standards would be more akin to student housing or an inner city urban area than an edge of town / residential area;
- The proposed density would be significant and out of keeping with the density of the surrounding residential area;
- The proposed height (and inclusion of pitched roofs) will have a striking effect / significant visual impact;
- There should be an active frontage along Anchor Springs;
- Proposed parking provision is significantly lower than applicable rates; and
- The need to consider flood risk and surface water drainage.

2.13 Many of the issues raised were inconsistent with previous advice and the position reached at the 13th February 2018 meeting, notwithstanding no change in the policy basis for considering proposals at this time. It was therefore concluded to advance proposals on the basis of previous advice and the design justification that had previously been accepted.

3.0 PLANNING POLICY CONTEXT

3.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the Site comprises:

- Arun Local Plan 2011-2031 (July 2018);
- Littlehampton Neighbourhood Development Plan (November 2014)

3.2 The National Planning Policy Framework (NPPF), and accompanying National Planning Practice Guidance (NPPG), is also a material consideration in the determination of planning applications.

National Planning Policy Framework (NPPF) (July 2018)

3.3 The new NPPF was published on 24th July 2018 and replaces the original version published in March 2012. The policies contained in the NPPF are a material consideration for Local Planning Authorities (LPAs) in decision-making.

Achieving Sustainable Development

3.4 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking. For decision-taking, this means approving development proposals that accord with the development plan without delay.

Delivering a Sufficient Supply of Homes

3.5 The NPPF seeks to boost significantly the supply of housing (Paragraph 59) and directs applications for housing to be considered in the context of the presumption in favour of sustainable development.

Building a Strong, Competitive Economy

3.6 Paragraph 80 of the NPPF encourages policies and decisions to help create the conditions in which businesses can invest, expand and adapt. This includes seeking '*to address potential barriers to investment such as inadequate infrastructure, services or housing, or a poor environment*' (Paragraph 81).

Ensuring the Vitality of Town Centres

- 3.7 One of the Government's key objectives is to support vitality and viability by recognising town centres as the heart of their communities and by taking a positive approach to their growth, management and adaptation. LPAs should also recognise that residential development often plays an important role in ensuring the vitality of centres and should encourage residential development on appropriate sites (Paragraph 85).

Promoting Sustainable Transport

- 3.8 Paragraph 103 encourages significant development to be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. In decision-making, development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (Paragraph 109).

Making Effective Use of Land

- 3.9 The NPPF is clear that decisions should promote an effective use of land in meeting the need for new homes and other uses. This means making as much use as possible of previously-developed or 'brownfield land' as possible (Paragraph 117). In cases where there is an existing or anticipated shortage of land, it is especially important that decisions avoid homes being built at low densities, and to ensure that developments make optimal use of the potential of each site (Paragraph 123).
- 3.10 For City and Town Centres and other locations which are well serve by public transport, the NPPF encourages the use of minimum density standards which *'should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate'* (Paragraph 123)

Achieving Well-Designed Places

- 3.11 The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development. Planning decisions should aim to ensure that developments are sympathetic to local character and history *'while not preventing or discouraging appropriate innovation or change (such as increased densities)'* (Paragraph 127).

Conserving and Enhancing the Historic Environment

- 3.12 The desirability of sustaining and enhancing the significance of heritage assets should be taken into account in the determination of planning applications.

Meeting the Challenges of Climate change, flooding and coastal changes

- 3.13 To avoid any potential flood risks, Local Plans should apply a sequential, risk-based approach to the location of development. Additionally, when determining applications, Local Authorities should ensure that flood risks will not be increased elsewhere, and all major developments should incorporate sustainable drainage systems unless there is clear evidence this would be inappropriate (Paragraph 165).

Arun Local Plan 2011-2031 (July 2018)

- 3.14 The Arun Local Plan 2011-2031 was adopted in July 2018 and sets out the vision for Arun to 2031 and beyond. The Arun Local Plan (ALP) 2018 contains the policies against which planning applications will be assessed and replaces all policies (with the exception of those relevant to the South Downs National Park) within the Arun Local Plan 2003.
- 3.15 Littlehampton town centre is recognised alongside Bognor Regis as offering major opportunities that could be unlocked through the regeneration of key development sites and promoting a mix of activities including shopping, entertainment, employment, education and housing in order to bring new vitality to the town centres. Both centres have defined 'Economic Growth Areas' (see Policy EMP SP2 below) which are a focus for employment, retail, leisure, housing and communities services growth (Paragraph 3.37).
- 3.16 The Application Site is located within the Littlehampton town centre boundary, as defined on the adopted Policies Map, and the existing entrance to the Waitrose store is defined secondary shopping frontage. The Site also falls within the Littlehampton Economic Growth Area (LEGA).
- 3.17 The following policies are considered to be of relevance to the Proposed Development:
- 3.18 **Policy SD SP1** (Sustainable Development) – echoes the NPPF's presumption in favour of sustainable development and requires the Council to work pre-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible.

- 3.19 **Policy SD SP1a** (Strategic Approach) seeks to *inter alia*: promote the growth and regeneration of the main towns of Bognor Regis and Littlehampton through the development of key sites; provide for housing needs by delivering 20,000 homes of an appropriate scale and tenure; encourage the effective use of previously developed land; and support development which protects, conserves and enhances built heritage.
- 3.20 **Policy SD SP2** (Built-up Area Boundary) requires development to be focussed within the Built Up Area Boundaries as defined on the Policies Map.
- 3.21 **Policy EMP SP1** (Strategic Economic Growth) seeks to promote the regeneration of the main town centres, including Littlehampton, especially in the Economic Growth Areas (EGAs); and **Policy EMP SP2** (Economic Growth Areas) will support development in the Littlehampton EGA which increases the vitality of the town centre.
- 3.22 **Policy RET SP1** (Hierarchy of Town Centres) seeks to focus development for major retail, leisure, commercial, office, tourism, cultural, community and residential development in the Town Centres, including Littlehampton. It is noted that this range of activities will promote economic resilience for the vitality of the centres.
- 3.23 **Policy H SP1** identifies a requirement to deliver 20,000 new homes in the District over the period 2011-2031. Taking in account completions and commitments (6,970 homes) this leaves a residual requirement for 13,130 new homes, the majority of which is intended to be met by the strategic site allocations (10,750 homes). There is also a commitment to allocate non-strategic sites (defined as less than 300 dwellings) in order to deliver at least 1,250 new homes. Consultation on the Non-Strategic Sites Allocations DPD is expected in Spring 2019.
- 3.24 For developments of 11 units or more, **Policy H DM1** (Housing Mix) requires a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations. It is however recognised in the supporting text that factors such as proximity to public transport and services, place and site characteristics will determine what is a suitable dwelling mix at any particular location (Paragraph 12.2.4). The tenure mix for development schemes will be negotiated on a case by case basis having regard to viability considerations.
- 3.25 For developments of 11 residential units or more, a minimum of 30% affordable homes (75% rent/25% intermediate housing) is required under **Policy AH SP2** (Affordable Housing), subject to viability. All applications that include residential development must include an Affordable Housing Statement (contained within this document).

- 3.26 **Policy D SP1** (Design) requires development proposals to make efficient use of land but also reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. For major development, a context appraisal, context plan and analysis of the site will be required alongside a Design and Access Statement.
- 3.27 Under **Policy D DM1** (Aspects of Form and Design Quality) the Council will have regard to a range of design considerations in determining planning applications including *inter alia* character, appearance/attractiveness, impact, adaptability, layout and density. With respect to the latter it is noted that higher densities will be more appropriate in the most accessible locations.
- 3.28 **Policy D DM2** (Internal Space Standards) refers to the Nationally Described Space Standards for guidance on appropriate internal space standards.
- 3.29 **Policy ECC SP1** (Adapting to Climate Change) supports development which is located and appropriately designed to adapt to impacts arising from climate change.
- 3.30 All new residential and commercial development is expected to be energy efficient under **Policy ECC SP2** (Energy and Climate Change Mitigation) with all major development producing 10% of total predicted energy requirements from renewable or local carbon energy generation on site, subject to viability.
- 3.31 All development should be designed to maximise the impact it can make to producing health communities under **Policy HWB SP1** (Health and Wellbeing). This may include, for example, providing or contributing to infrastructure to encourage physical exercise.
- 3.32 Housing development will be required to contribute towards new recreation and leisure facilities either on-site or through a financial contribution under **Policy OSR DM1** (Protection of open Space, Outdoor and Indoor Sport, Community, Arts and Cultural Facilities).
- 3.33 The Council will support development that is designed to reduce the need to travel by car under **Policy T SP1** (Transport and Development). It is also necessary for developments to incorporate appropriate levels of parking in line with West Sussex County Council (WSCC) guidance and to be supported by an effective and deliverable Transport Assessment and Travel Plan. Provision for appropriate levels of cycle and pedestrian facilities to meet WSCC standards is also required under **Policy T DM1** (Sustainable Travel and Public Rights of Way).

- 3.34 **Policy HER SP1** (The Historic Environment) supports proposals which conserve or enhance the historic environment which includes Conservation Areas and Listed Buildings as designated heritage assets. These are given the highest level of protection and should be conserved in a manner appropriate to their significance. **Policy HER DM1** (Listed Buildings) and **Policy HER DM3** (Conservation Areas) set out the Council's approach to proposals which may affect such heritage assets respectively.
- 3.35 Development is required to achieve a net gain in biodiversity under **Policy ENV DM5** (Development and Biodiversity) and to protect existing habitats on site. Where there may be evidence of protected species on a development site, a detailed survey is required to support a planning application.
- 3.36 **Policy W SP1** (Water) encourages the incorporation of sustainable drainage systems in new development and development which reduces the risk from flooding. Under **Policy W DM1** (Water Supply and Quality), development will be permitted where sufficient water supplies can be provided prior to occupation.
- 3.37 **Policy W DM2** (Flood Risk) sets out the criteria against which development in areas at risk from flooding will be considered; and **Policy W DM3** (Sustainable Urban Drainage Systems) requires development proposals to incorporate SUDS, appropriate to the size of development.
- 3.38 **Policy WM DM1** (Waste Management) requires new residential development to ensure that kerbside collection is possible for waste vehicles and, where appropriate, make provision for communal recycling bins and safe bin storage areas available to residents of flats.
- 3.39 **Policy QE SP1** (Quality of the Environment) requires all development to contribute positively to the quality of the environment and does not have a significantly negative impact upon residential amenity or the natural environment.
- 3.40 **Policy QE DM1** (Noise Pollution) requires residential development likely to experience noise from nearby roads must be supported by a noise assessment.
- 3.41 **Policy QE DM2** (Light Pollution) requires proposals which involve outdoor lighting to be accompanied by a lighting scheme.
- 3.42 **Policy QE DM3** (Air Pollution) requires all major development proposals to assess the likely impacts of the development on air quality and to mitigate any negative impacts by *inter alia* ensuring development is located within easy reach of public transport services;

maximising provision for cycling and pedestrian facilities; and including electric charging points.

- 3.43 The Council will support proposals which provide or contribute towards the infrastructure and services needed to support the development, adopting the approach set out under **Policy INF SP1** (Infrastructure Provision and Implementation).
- 3.44 **Policy INF SP2** (New Secondary School) requires all development which generates a need for secondary school places (where there is an identified deficit) to make an appropriate financial contribution.

Local Plan Evidence Base

Housing & Economic Land Availability Assessment (HELAA) (November 2018)

- 3.45 The Council published its most up to date assessment of housing and economic land availability in November 2018, replacing the previous version published in December 2017.
- 3.46 The Application Site is identified alongside the adjacent St Martin's Car Park (owned and operated by Arun District Council) as a 'developable' site with potential for residential use as part of a mixed-use development (Ref: PS12).

Brownfield Land Register Part 1 (November 2017)

- 3.47 The Council's Brownfield Land Register (Part 1) comprises all brownfield sites that meet the criteria set out in the Brownfield Land Regulations. These sites have been assessed by the Council as being appropriate for residential development.
- 3.48 The Application Site is listed (Ref: PS12) with potential to accommodate up to 75 dwellings.

Littlehampton Neighbourhood Development Plan (LNDP) (November 2014)

- 3.49 The Littlehampton Neighbourhood Development Plan forms part of the statutory Development Plan for the Application Site and sets out the vision and objectives for addressing key priorities within Neighbourhood Plan area. This includes a need to contribute towards meeting the demand and need for new homes and targeting development to previously used sites within the built up area.
- 3.50 The following policies are considered of relevance to the Proposed Development:

- **Policy 1** (Presumption in Favour of Sustainable Development);
- **Policy 2** (A Spatial Plan for the Town);
- **Policy 3** (Housing Supply); and
- **Policy 22** (Design of New Development).

3.51 Policy 3 (Housing Supply) commits to the provision of at least 200 homes over the period 2014-2029 (above existing commitments) on sites allocated within the LNDP (under Policy 4). The Application Site is not allocated for residential development within the LNDP.

3.52 Policy 3 states that there will be a presumption against proposals for which provision has not been made in the Neighbourhood Plan, or that are not windfall schemes. This is considered out of date in the context the adopted Arun Local Plan (July 2018) which identifies a need to allocate additional non-strategic sites which may include sites within the Littlehampton Neighbourhood Plan area and it should not be for the Neighbourhood Development Plan to prejudice strategic priorities.

4.0 PROPOSED DEVELOPMENT

- 4.1 A full description of the proposals is provided in the Design and Access Statement (DAS), prepared by Pod Architects, which accompanies this submission. A summary of the proposals is provided below.
- 4.2 The Proposed Development involves the demolition of the former Waitrose building on the southern part of the Site and the erection of a new building providing 158.5 sqm GIA of modern, flexible retail floorspace (Use Classes A1 and/or A2 and/or A3 and/or D1) at lower ground level, with part three and part four storeys of residential use (Use Class C3), comprising 49 apartments, above (referred to in the DAS as Building 2). On the northern part of the Site, comprising the former Waitrose car park, a second residential building (Use Class C3) is proposed, comprising 34 apartments (referred to in the DAS as Building 1).
- 4.3 A total of 41 car parking spaces are proposed (including 2 disabled spaces) to serve both buildings. In addition there is also secure storage for up to 66 bicycles with 21 additional cycle stands proposed externally (10 stands outside the entrance to Building 1 and 11 stands to the west of Building 2). Waste storage facilities are proposed in both buildings, which are accessible from Avon Road.
- 4.4 The proposed flexible retail floorspace is arranged across two units, located in Building 2, which front onto East Street. This will create an active frontage and help to better integrate the Site with the nearby High Street. This will deliver a significant improvement on the existing blank façade of the former Waitrose building which currently occupies this position and provide an enhanced surrounding for the adjacent East Street Conservation Area.

5.0 PLANNING CONSIDERATIONS

- 5.1 This section identifies the key issues associated with the Proposed Development and justifies the proposals in planning terms. A summary of the relevant planning policy is summarised in Section 3.

Principle of Development

- 5.2 The Application Site comprises previously developed land located within the built-up area of central Littlehampton and is highly accessible by a range of sustainable modes of transport. Both the NPPF and local Development Plan policy seek to deliver much needed new homes in sustainable locations (and thereby reducing the need to travel by car) and maximising the use of previously developed land.
- 5.3 The Site is located within the town centre boundary and wider Littlehampton Economic Growth Area (LEGA), which is aimed at accommodating development which reinforces the role of Littlehampton town centre. Both the NPPF and Development Plan recognise that residential development often plays an important role in ensuring the vitality of town centres and in this case the proposals would directly contribute towards achieving the objectives of the NPPF (Section 7) and Development Plan Policies RET SP1 and EMP SP2. The proposed flexible retail uses are also entirely consistent with these policy objectives.
- 5.4 The Site is also identified within the Council's evidence base and Brownfield Land Register as a 'developable' site, suitable for residential development.
- 5.5 The principle of the Proposed Development is therefore considered acceptable in the context of the overarching objectives of the NPPF and the Development Plan to meet the need for new housing in the most sustainable locations, making the most effective use of previously developed land and supporting the vitality and viability of town centres.

Residential Mix / Tenure

- 5.6 As detailed within Section 4, the Proposed Development will deliver 83 additional homes on previously developed land in accordance with Policy SD SP1a, and will contribute towards meeting the Council's overall housing needs as detailed within Policy H SP1. The proposed residential units will comprise a mix of 48 1 bed, 2 person flats, and 35 2 bed, 4 person flats.

- 5.7 In accordance with Policy AH SP2, 30% (25 units) on site would be provided as affordable housing. Flexibility is sought as to the form these affordable units would take as at this stage, as it is presently unknown as to whether all proposed units will be for marketed for sale individually or alternatively, to a PRS operator.

Design

- 5.8 The proposed buildings have been informed by and designed in a way which reflects the opportunities of the Site and its highly sustainable location, and responds to the physical characteristics of the Site and the surrounding area.

Density

- 5.9 The Proposed Development comprises 83 units across 0.6ha which equates to an approximate density of 138 units per hectare. This is considered appropriate given the location of the Site in an area with good access to public transport and in close proximity to a range of local services and facilities.
- 5.10 It is acknowledged that the proposed density is higher than that of the more established residential areas to the east and north of the Site. However, the NPPF is clear that planning decisions should support development which makes efficient use of land, taking into account the desirability of maintaining an area's prevailing character and setting, or of promoting regeneration and change (our emphasis). In its vision, the adopted Development Plan states that '*Littlehampton and [it's] surrounding area will have achieved greater prosperity through economic regeneration and urban renewal* (para 4.3). In pursuit of this vision, the Council should not preclude the Proposed Development on the basis of inappropriate density relative to existing conditions.

Character and Appearance

- 5.11 As detailed within the Design and Access Statement, close attention has been paid to the local context including the proximity to the adjacent conservation area and heritage assets. The vernacular architecture has inspired the proposed design which incorporates pitched roofs, mansard roofs, flint stone, red brick and white stucco; all of which are architectural features and materials typical to Littlehampton. In this respect, the Proposed Development is in accordance with Policy D SP1.

- 5.12 Full details of the contextual analysis which has informed the design approach are set out in the accompanying Design and Access Statement.

Scale

- 5.13 The scale of the Proposed Development has been informed by the existing site conditions, notably the former Waitrose building and the clear opportunity to provide a significant enhancement to the overall quality of the built form in this part of Littlehampton town centre. We have acknowledged the Council's comments on height and massing expressed during pre-application discussions and in response we have reduced the overall height of the buildings and through the use of vertical articulation and façade treatments, sought to breakdown the massing across the long elevations.

- 5.14 In the context of the Site's town centre location we consider the scale of the Proposed Development to be appropriate and consistent with the objectives of the NPPF and Development Plan policies.

Impact on Amenity

- 5.15 Local Plan Policy D DM1 requires developments to have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of privacy and outlook. A detailed over-looking analysis has been undertaken (as set out within the Design and Access Statement) and any proposed apartments with balconies which were found to be at risk of being overlooked by existing buildings, have been recessed into the facade. This study displays the effort the proposal has gone to reduce potential privacy issues regarding both existing buildings and the proposed balconies.

Heritage

- 5.16 There are no statutory listed buildings located within the Site boundary, however a number of listed buildings are situated within its immediate vicinity. In addition, the Site is situated immediately adjacent to the Littlehampton East Street Conservation Area and shares the majority of its eastern boundary with the western edge of the conservation area.
- 5.17 In accordance with the NPPF, a detailed Heritage Statement has been prepared which assesses the significance of identified heritage assets, including an assessment of the contribution made by setting on their significance; and assesses how this may be affected by the Proposed Development.

- 5.18 In assessing the effects of the Proposed Development, the Heritage Statement concludes that *'the replacement of the current supermarket building with a high-quality, well considered scheme will significantly improve the surrounding townscape, replacing a dilapidated area which currently detracts from the surrounding context. The materiality of the proposed residential blocks responds to the use of traditional red brick and flint materials, a common building material throughout Littlehampton. The introduction of flint stone, red brick and pitched roofs responds to the established vernacular character. The proposed building is a significant improvement on the existing situation'*.
- 5.19 Overall, the Heritage Statement concludes that the application proposals will preserve the significance of the designated heritage asset. The proposals are therefore in accordance with the NPPF and adopted Development Plan.

Flood Risk

- 5.20 As set out within the Flood Risk Assessment, the south eastern part of the Site is located partially within Flood Zones 2 and 3, indicating a medium to high probability of flooding from tidal and/or fluvial sources. The remainder of the Site is located within Flood Zone 1 denoting a low probability of tidal and/or fluvial flooding.
- 5.21 The remainder of the Site would be at risk of flooding during the future 1 in 200 year event for the year 2115 due to sea level rise caused by climate change. To mitigate against this risk, all more vulnerable residential finished floor levels would be set at 5.20m AOD, 310mm above the future flood level, in accordance with planning policy.
- 5.22 The risk of flooding from fluvial, groundwater and artificial sources has also been assessed and found to be low. There is a risk of pluvial (surface water) flooding in East Street just beyond the south east boundary of the Site with the potential for flows to exceed the kerbs in extreme events. Flood resilience measure would be incorporated to mitigate the potential risk to the retail units proposed at this location.
- 5.23 Surface water from the Proposed Development would discharge to the surface water sewer located within Avon Road, as per the existing situation. As works to Avon Road would only comprise minor resurfacing and the drainage would be retained as existing, this has been excluded from the proposed drainage strategy.
- 5.24 The existing runoff rate for the Site (excluding Avon Road) has been calculated to be 60.0 l/s. It is proposed to restrict discharge to 10 l/s, providing a betterment of 83%.

Based on this restriction, a total of approximately 253m³ of attenuation storage would be required.

- 5.25 Buildings 1 and 2 are separated by Avon Road and so have been designed as two separate drainage catchments for ease of operation and maintenance. Catchment 1 would require 129m³ of storage, which would be provided in sub base storage beneath the proposed car park. Catchment 2 would require 124m³ of storage, which would be provided in a geo-cellular attenuation tank located below the area of planting to the west of Building 2.
- 5.26 The Flood Risk Assessment demonstrates that the Proposed Development has a low probability of flooding from tidal, fluvial, pluvial, groundwater and artificial sources, and confirms that surface water runoff can be managed sustainably to ensure that flood risk is not increased elsewhere. In this respect, the proposals are therefore considered to satisfy the requirements of the NPPF and the adopted Development Plan.

Highways and Parking

- 5.27 As detailed within the accompanying Transport Statement, the Site benefits from a very good level of accessibility to local facilities and sustainable modes of transport.
- 5.28 Access to the Site will remain largely as existing with vehicular access provided from the existing one-way arrangement along Avon Road.
- 5.29 It is proposed that a total of 41 No. car park spaces (including 2 No. disabled spaces) are to be provided for the apartments. The main car park comprising 26 No. car park spaces will be located adjacent to Building 1. The remaining spaces will be located along Avon Road. The disabled spaces are to be located at the southern end of the main car park, close to the footways along Avon Road. There are no car park spaces proposed for the retail units.
- 5.30 The level of parking proposed at the development is lower than the required demand identified by the West Sussex Residential Parking Demand Calculator. However, pre-application advice received from WSCC, stated that if the proposed parking provision is under the required parking demand, the applicant should *"provide some additional justification considering sustainable transport opportunities within reasonable walking distance of the site"*.
- 5.31 With the above in mind, it is important to emphasise that the Site is highly accessible by more sustainable modes of travel than the private car and there are a wide range of

facilities and attractors that are within convenient distance to the Site given its location within Littlehampton Town Centre. Consequently, it is likely that a high proportion of trips to the Site would be undertaken on foot, by cycle or by public transport.

- 5.32 Additionally, the Site will be subject to the implementation of a Residential Travel Plan which will provide measures aimed at further reducing car journeys to the Site.
- 5.33 It should also be stressed of course that anyone purchasing a property would be acutely aware as to whether a parking space is provided for that particular property. It is unlikely that someone owning a car would purchase a property at the development if a designated parking space was not provided. That is, any properties without a parking space will likely attract prospective residents who do not own a car and whose intentions are to make full use of the site's highly accessible location and to choose to travel by non car modes, thereby further promoting sustainable travel and consequently reducing demand on the highway network.
- 5.34 Secure storage for up to 80 No. cycles is to be provided (32 within Building 1 and 48 within Building 2) and 20 No. cycle spaces in the form of 10 No. cycle stands will be provided outside of the entrance to Building 1.
- 5.35 In terms of potential impacts on the highway network, the Proposed Development is projected to generate an immaterial level of trips, particularly by vehicular modes (and far less than traffic flows associated with the Site's former use as a Waitrose store). The level of additional trips would not have a discernible impact upon the local transport network.

Sustainability

- 5.36 As detailed within the accompanying Energy and Renewable Strategy Report, the energy strategy for the Proposed Development is based on low energy passive design measures and efficient building services to reduce carbon emissions. Measures include:
- Glazing g-value specified to control solar heat gain. The final glazing selection should be chosen to maximise access to daylight within the limit of the given maximum g-value allowed, thereby reducing the use of electric lighting, and instances of high internal temperatures in summer.
 - Building fabric specifications have adopted low U-values, with a high resistance to heat transfer, reducing space heating requirements
 - High efficiency gas-fed community heating system for space heating and domestic hot water

- * High efficiency mechanical ventilation systems with heat recovery (MVHR)
- * Low energy electric lighting systems
- * Photovoltaic panels – connected to landlord supply

5.37 In accordance with Development Plan Policy WCC SP2, provision for on-site renewable energy has been incorporated in the form of photovoltaic panels on the roof of each building.

Ecology

5.38 The supporting Ecological Impact Assessment has not identified any potential Important Ecological Features that are anticipated to be affected by the Proposed Development. As such the Development is unlikely to result in significant ecological effects and an assessment of effects is not required.

5.39 The Proposed Development will provide the following ecological enhancement measures in line with Development Plan Policies ENV SP1 and ENV DM5 to conserve and increase the ecological value of the Site:

- * The provision of a variety of habitats to provide floristic diversity (e.g. lawns, trees, shrub planting and herbaceous planting) and the use of native species or species of benefit to wildlife within the Development's landscape scheme. Detailed landscape plans for the Development will be provided at the post-planning stage assumed to be secured via a planning condition;
- * The provision of a green roof to provide suitable foraging opportunities for local fauna such as bats, bird and invertebrates; and
- * Artificial habitats for bats and birds to enhance the Site for these species group.

Open Space

5.40 In accordance with Development Plan Policies HWB SP1 and OSR DM1 the proposals will make a contribution towards recreation and leisure facilities in the form of a financial contribution to be secured by S106.

6.0 CONCLUSION

- 6.1 The proposals are considered to fully comply with all relevant planning policies contained within the adopted Development Plan. Furthermore, the proposals are considered to embrace the Government's overarching aim of achieving sustainable development as set out within the NPPF.
- 6.2 In land use terms the proposals are entirely consistent with the Council's overarching Strategy for the District, which seeks to direct mixed use development towards town centres such as Littlehampton which are highly accessible by a range of sustainable transport modes and offers a range of services within walking distance.
- 6.3 In design terms, the proposals have been carefully considered to provide a high quality and well-integrated design solution which is appropriate to the Site's location and setting. We also contend that the proposals provide the opportunity to provide an enhanced building on the Site, to the benefit of Littlehampton.
- 6.4 The Site's proximity to nearby heritage assets has been considered and assessed and the proposals are considered to preserve the significance of designated heritage assets.
- 6.5 The Proposed Development lies within a flood risk area however the design response ensures that there will be a low probability of flooding from tidal, fluvial, pluvial, groundwater and artificial sources, and confirms that surface water runoff can be managed sustainably to ensure that flood risk is not increased elsewhere.
- 6.6 The proposals will not have a discernible impact on the local highway network and whilst the level of car parking provision falls below the requirements of WSCC, it is important to emphasise that the Site is highly accessible by more sustainable modes of travel than the private car and there are a wide range of facilities and attractors that are within convenient distance to the Site given its location within Littlehampton Town Centre. Consequently, it is likely that a high proportion of trips to the Site would be undertaken on foot, by cycle or by public transport.
- 6.7 The proposal will incorporate a range of passive design and energy efficiency measures throughout the site, including on-site photovoltaic panels in order to reduce the regulated CO2 emissions in line with the Council's policy.
- 6.8 Given the above we consider that no material planning reasons exist to preclude the grant of planning permission.

