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VIA EMAIL

27214/A3/SS/GW
15th March 2019

Dear Ms Gardner,

FORMER WAITROSE, LITTLEHAMPTON
PLANNING APPLICATION REF: LU/ 3/ 19/ PL

Further to our recent discussions regarding the above application, we wish to take this opportunity to respond to the matters raised during consultation from both members of the public and statutory consultees. It is noted that a detailed response has yet to be provided by the Council's Conservation Officer, and we therefore reserve the right to provide a further response once we have had the opportunity to review and consider additional comments.

Residential Use

The principle of residential use on this Site is supported, both at the national and local level, by planning policy.

As set out within the NPPF (2019), it is the Government's objective to 'significantly' boost the supply of homes (para 59). The NPPF also encourages the use of previously developed land in sustainable locations and to optimise the use of such land in meeting locally identified needs for new homes.

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 the adopted 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 Site is identified within the Council's Local Plan evidence base (HELAA 2019 – Ref: PS12) which establishes the suitability of the Site for residential use.

The recent publication of the Government's Housing Delivery Test (February 2019) confirms that the Council is not currently delivering the level of housing which it needs to, and an Action Plan is required to address this. The Site would directly contribute towards increasing the delivery of housing within the District.



Density

The proposed density of the development reflects the Site's highly sustainable location and seeks to optimise the use of the land as encouraged by the NPPF, whilst also having regard to character of the area and site-specific conditions.

Flood Risk and Drainage

We note the responses from the Environment Agency (EA) and WSCC as Local Lead Flood Authority (LLFA), which confirm that there is no objection to the Proposed Development subject to conditions. We are happy to accept the conditions proposed, subject to a minor amendment to the following condition proposed by the EA:

'The development shall be carried out in accordance with the submitted Flood Risk Assessment (December 2018, Waterman) and the following mitigation measures it details:

- *The Finished Floor Levels **of the residential units** shall be set no lower than 5.2m above Ordnance Datum (AOD).'*

We note Southern Water's request to determine the exact position of the water mains and surface water sewer *'before the layout of the Proposed Development is finalised'*. However, we consider this to be an overly onerous request at this stage when such details can be secured by way of condition with a provision to enable the re-direction of pipelines should a conflict between the location of Southern Water's infrastructure and the proposed buildings be established. We have raised this directly with Southern Water and they have confirmed that it is possible for this matter to be dealt with by way of condition.

In response to the comments raised by the Council's Drainage Officer on the need for infiltrations to be investigated, again we would be happy to accept a condition in this regard. However, we would point out that on review of the BGS borehole data, that the Site is likely underlain by clay, with high groundwater levels such that this would preclude infiltration in any event.

Car Parking

We note the public concerns that the Proposed Development does not provide sufficient car parking provision. However, the Application Site is in a highly accessible and sustainable location. It's location in Littlehampton town centre promotes 'local living,' allowing convenient access to local services. It is also within walking distance of Littlehampton train station and various bus stops within the town centre offering convenient access to alternative, sustainable modes of travel and less reliance on private car.

A Framework Residential Travel Plan has also been prepared, the principal aim of which is to reduce the dependency on use of the private car and encourage travel to/from the Site by more sustainable modes including walking, cycling, public transport and car sharing. The proposals make provision for 108 cycle spaces including 66 internal spaces (a level in excess of the required standard) and 42 external spaces, which will be also be available to wider users of the town centre thereby facilitating the use of sustainable travel beyond the development itself.

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.

On the basis of the above, it is considered that the proposals are aligned with the objectives of the NPPF to promote sustainable travel, and further that the proposed level of car parking provision is entirely justified considering sustainable transport opportunities within reasonable walking distance of the Site.

It is also relevant to note that WSCC, as highway authority, do not have any objection to the level of parking provision proposed. We have also provided WSCC with additional information requested in their response dated 4th February 2019 which they have confirmed is acceptable. For the purposes of transparency, this information

has been packaged into a Technical Note (dated 15th March 2019) prepared by Fore which we wish to formally submit to the Council in support of the application. It is understood through discussions with WSCC Highways that they intend to formally reply to the Technical Note through the consultation process with no objection to the development proposal.

Impact on Heritage Assets

We note the comments from the Littlehampton Heritage Group. However, it is considered that the replacement of the existing 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 Site itself is not a heritage asset and the test within the NPPF is to ensure development preserves the significance of designated heritage assets. Given the current character of the Site it is difficult to conclude that the proposals would do anything other than preserve or enhance the designated heritage assets.

Detailed analysis has been undertaken to understand and appreciate the heritage assets situated within proximity to the Site (as set out within the Heritage Statement submitted with the application) and overall it is concluded that the proposals will preserve the significance of these assets in line with the NPPF.

Impact on Amenity

Some concerns have been raised over the potential for overlooking and loss of privacy to neighbouring properties along East Street and Avon Road. However, as detailed within the Design and Access Statement (p. 70) the proposals have been designed to minimise any potential for overlooking setting the buildings back to maximise distances between neighbouring properties and also ensuring that there are no windows on the east elevation of Building 1.

Concerns have also been raised about impact on amenity during construction. Whilst some disruption is unavoidable, we would seek to minimise this through the use of a Construction Management Plan, to be submitted to and approved by the Council by way of condition.

Impact on Community Facilities

It is evident that the local community are concerned about the impact that new residents in Littlehampton may have on the capacity of existing community infrastructure for example, doctors, dentists and schools. However, we fully envisage negotiations with the Council on infrastructure provision to ensure that the needs of occupiers of the Proposed Development are satisfactorily met in line with Local Plan Policy INF SP1.

It should also be noted that the proposals seek flexibility over the use of the proposed commercial units which may include an operator within D1 Use Class (e.g. clinics, health centres, creches, day centres amongst others). The Proposed Development therefore has potential to provide on-site community facilities.

Servicing arrangements for the Commercial Units

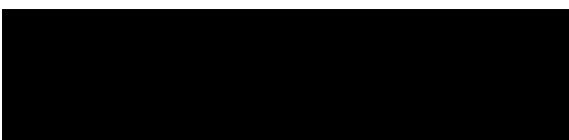
We have reviewed the servicing arrangements for the proposed commercial units and there is sufficient area available within the proposed bin store in Building 2 to accommodate separate stores for the residential and commercial uses. This is shown on the Proposed B2 Retail Floor Plan (Ref: 1288_TPP-1161 Rev A) enclosed. This would allow for the commercial units to be serviced off Avon Road.

Servicing arrangements for the Residential Buildings

As detailed on the Proposed B1 Ground Floor Plan (Ref: 1288_TPP_1061) and the Proposed Retail Floor Plan (Ref: 128_TPP_1005) there are enclosed bins stores located in both Buildings 1 and 2, accessed by service vehicles from Avon Road.

Next Steps

We trust that the additional information fully addresses the matters raised in the comments received to date and look forward to receiving confirmation of this. However, should you have any further queries, please do not hesitate to contact either Graeme Warriner or Susie Stephen at these offices.



Yours sincerely,



BARTON WILLMORE

Encs.