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PLANNING SUPPORT STATEMENT

In relation to:

‘Change of use of the upper floors of The Look & Sea Centre from the existing mixed use to C1 Use Class, comprising 6 No. suites for tourist accommodation’

**The Look & Sea Centre, 61-63 Surrey Street,
Littlehampton, West Sussex, BN17 5AW**

February 2020



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PLANNING STATEMENT

**The Look & Sea Centre, 61-63 Surrey Street, Littlehampton, West Sussex,
BN17 5AW**

I. INTRODUCTION

- 1.1 This planning application proposes the change of use of the upper floors of the Look & Sea Centre from its current mixed use to 6 No. suites for tourist accommodation.
- 1.2 This Planning Statement is submitted in support of the above planning application. The statement describes the site, its surroundings and the proposal itself. The Planning Policy background is considered along with an assessment of the proposal in light of the relevant policies and all other material planning considerations.
- 1.3 This statement should be read in conjunction with the submitted drawings, which have been prepared by Folkes Architects.



2.1 The proposed development relates to the upper floors of the existing Look & Sea Centre. The Look & Sea Centre is part of a larger mixed use building, with its uses including a visitor centre, café, shop and YMCA facility. It can be described as a focal point of the Littlehampton Town Centre regeneration project and is located in a prominent corner position, overlooking the River Arun.



Fig 1. Aerial map of the application site & its surroundings (courtesy of Google Maps)

2.2 It is understood that the ground floor is used for a café with ancillary staff and food preparation areas, as well as tourist information facilities, although this latter element is now much reduced. These remain unaffected as a result of the development proposals. The lawful use of the upper floors is currently for meeting/function rooms and office space, as well as for storage purposes. As of August 2018, these upper floors of the building are now vacant.



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- 2.3 The surrounding area is mixed, predominately characterised by terraced and flatted development. Buildings are varied in their heights and design; although typically two and three storeys. The locale comprises mostly modern residential development, but with some historic properties. Surrounding buildings consists of a variety of uses, which includes (amongst other things) residential dwellings, flatted development, the Lifeboat station and retail (including cafes/ restaurants).
- 2.4 In terms of the application sites designation in relation to Local level policies, the site is located within the built-up area boundary for Littlehampton as defined by Map 4: Littlehampton & Surrounding Area. The site is also located within a Town Centre Location and a designated Economic Growth Area.
- 2.5 The site is located outside of, albeit close to a River Road Conservation Area (refer to **fig 2**).

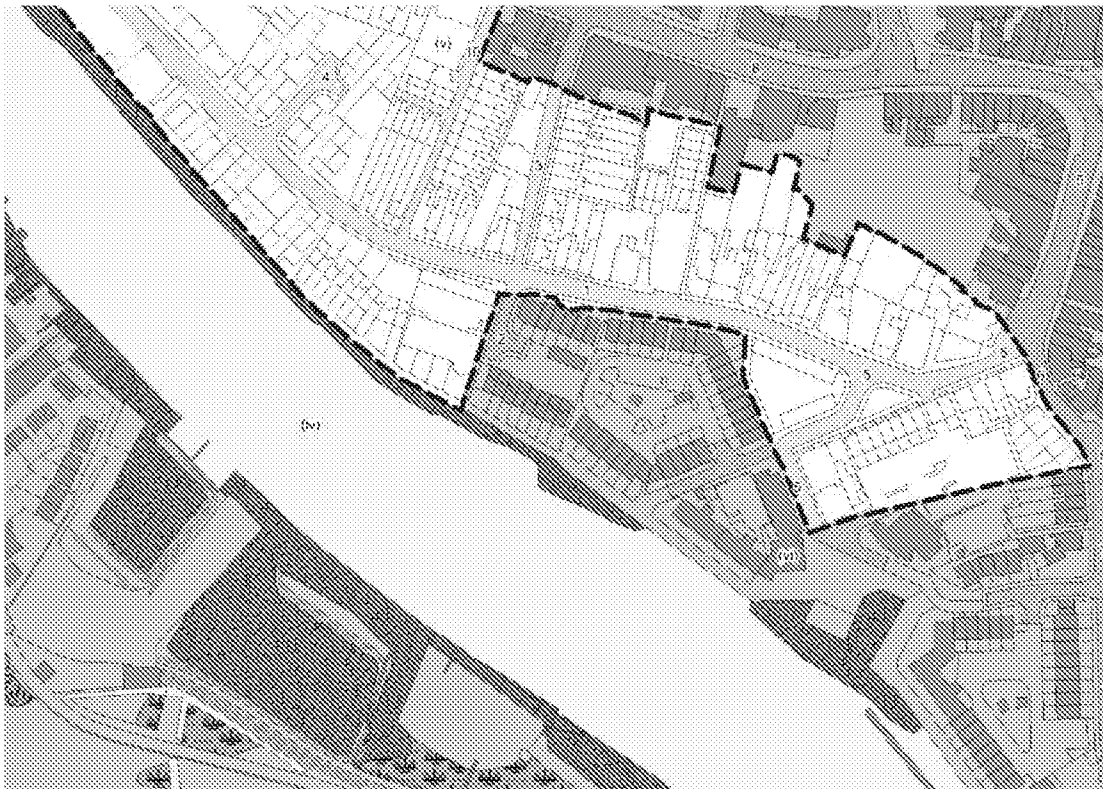


Fig 2. Extract from Littlehampton - River Road Conservation Area Map



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- 2.6 Finally, we are aware of a number of Listed Buildings within the vicinity of the site, as depicted by a red square on Fig 3 below.

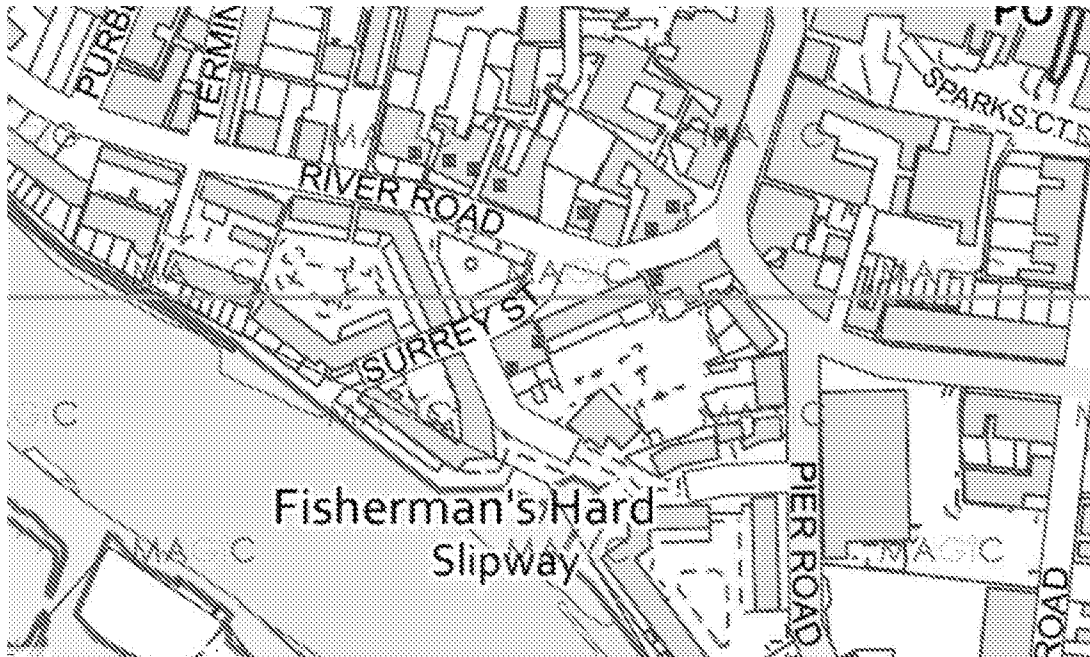


Fig 3. Extract from Magic Map, showing the location of the closest Listed Buildings



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3. THE PROPOSAL

- 3.1 This proposal seeks planning permission for the change of use of the upper floors of the existing building from mixed use to Use Class C1, comprising a hotel use, with 6 No. individual suites for tourist accommodation.

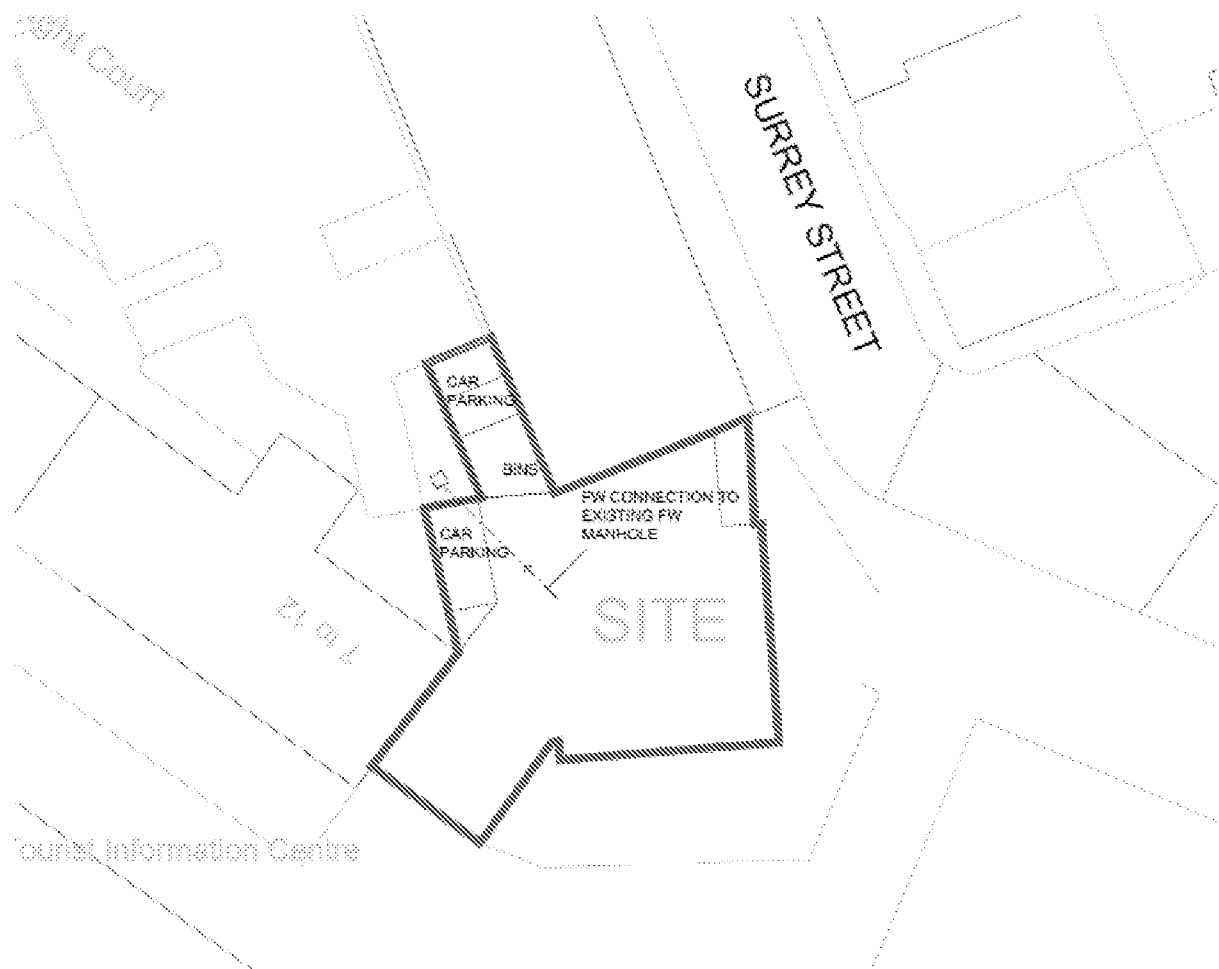


Fig 4. Extract from proposed Site Layout Plan



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- 3.2 As detailed at **Fig 5**, the existing first floor currently comprises an entrance lobby, meeting/ function room, office, and associated storage space. The second floor has a meeting/ function room.

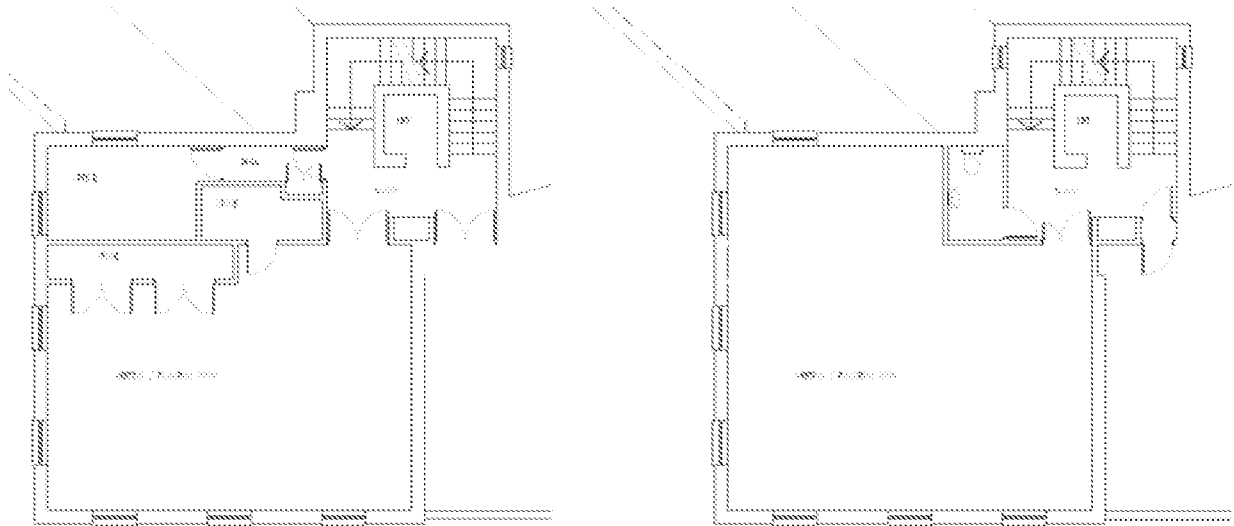


Fig 5. Extract from existing first and second floor plans

- 3.3 The proposed development would comprise 6 No. self-contained units to be used for holiday accommodation. The rooms will be serviced.

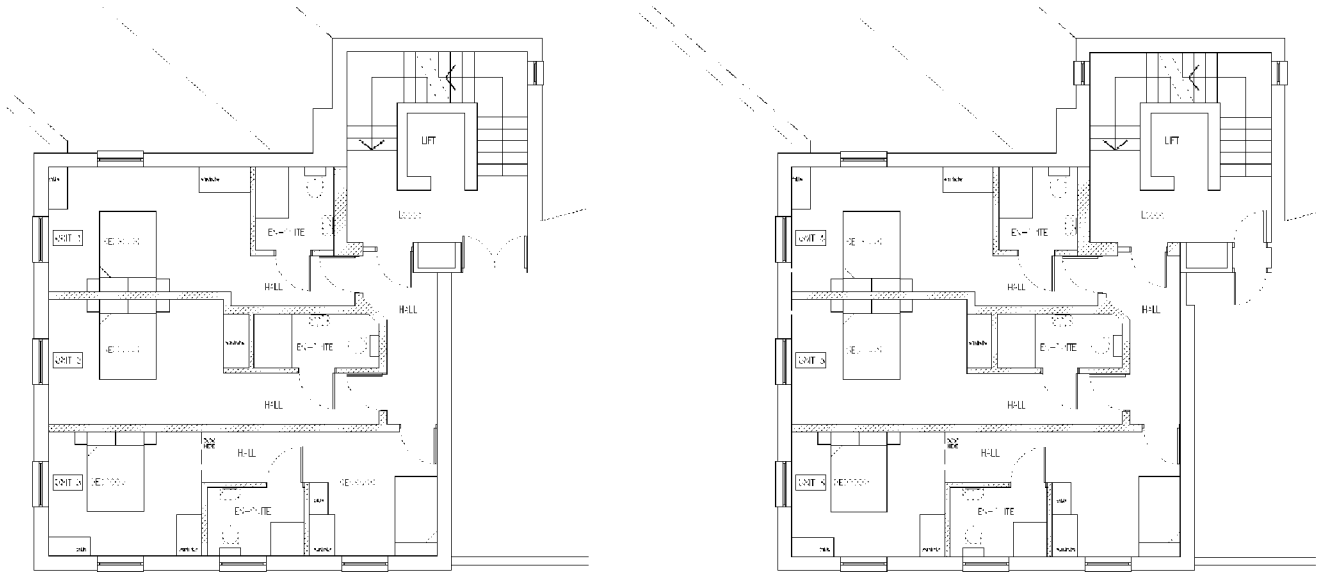


Fig 6. Extract from proposed first and second floor plans



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- 3.4 As detailed at **fig 6**, on each floor there would be 1 x 2 No. bedrooms and bathroom units, and 2 x 1 no. bedroom and bathroom units. The units are intended to be solely for accommodation purposes, with no living areas or kitchen facilities provided. The clients intention is for the premises to operate as a hotel, with a remote reception.
- 3.5 The schedule of accommodation would be as follows:-
Flats 1 and 4 - 21.45m² (230.88 sq.ft);
Flats 2 and 5 - 21.85m² (235.19 sq.ft);
Flats 3 and 6 - 27.35m² (294.39 sq.ft).
- 3.6 The ground floor of the building will remain unchanged as a result of the development proposals.
- 3.7 Further, no external alterations or extensions are proposed as part of the development.
- 3.8 The parking provision will remain unchanged as a result of the development proposals. The building has 3 No. existing and proposed parking spaces.



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4. PLANNING POLICY CONTEXT

a. National Planning Policy

(i) National Planning Policy Framework (NPPF)

- 4.1 The National Planning Policy Framework (NPPF) was originally published in 2012, with a revised version published in July 2018. A further updated version of the NPPF was published in February 2019, comprising only minor alterations to the 2018 publication.
- 4.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.3 The focus of the revised NPPF continues to be achieving sustainable development. The NPPF clarifies that *“at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”* (taken from Resolution 42/187 of the United Nations). However, at paragraph 8 the Framework sets out that in planning terms, and in order to achieve sustainable development there are *“three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”*. These objectives are economic, social and environmental, which *“should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”* (paragraph 9).

- 4.4 Paragraph 11 is an important element of the NPPF. It states that: *“Plans and decisions should apply a 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”.*
- 4.5 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”*
- 4.6 Section 4 of the Plan refers to Decision Making. At paragraph 38 of the Framework, it sets out that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should... work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. **Decision-makers at every level should seek to approve applications for sustainable development where possible.**”*
- 4.7 Section 6 relates to building a strong and competitive economy. At paragraph 80, it notes 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future”.

- 4.8 Section 7 refers to ensuring the vitality of town centres, noting that *“planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”.*
- 4.9 Section 9 discusses sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles.
- 4.10 Paragraph 105 sets out that *“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.”*
- 4.11 Paragraph 108 confirms that the main considerations in transport terms when determining specific planning applications is that proposals should provide: *“a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; and c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*
- 4.12 At paragraph 109 the Framework also confirms that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact*

on highway safety, or the residual cumulative impacts on the road network would be severe.”

- 4.13 Section 11 is entitled ‘Making effective use of land’. Paragraph 117 confirms that *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”.*
- 4.14 Paragraph 120 states that *“decisions need to reflect changes in the demand for land... applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.”*
- 4.15 Section 12 refers to achieving good design. Paragraph 124 states *“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development...”*
- 4.16 Paragraph 127 sets out that *“decisions should ensure that developments:*
- a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*



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- e. *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f. *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

4.17 Paragraph 130 confirms that *"where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development."*

4.18 Finally, section 14 relates to meeting the challenge of climate change, flooding and coastal change. Paragraph 155 states that *"inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere"*.

4.19 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"*. Footnote 50 states that *"a site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use"*.

4.20 Further parts of the Framework that are of particular note include Section 15, which refers to the desire for development to conserve and enhance the natural

environment and Section 16, which relates to the conserving and enhancing the historic environment.

(ii) The Arun Local Plan 2011 – 2031

- 4.21 The Arun Local Plan 2011 – 2031 was adopted by resolution of Full Council on 18th July 2018. It comprises a written statement and supporting policy maps 1-4. The plan sets out a spatial vision, objectives and a sustainable strategy for delivering the needed growth of the District over the period 2011 – 2031. This plan replaces the Arun Local Plan 2003 and the saved policies within it and now provides the most up-to-date policy guidance for the District.
- 4.22 The Application Site is located within the built up area boundary for Littlehampton where in accordance with **Policy SD SP2** (Built up Area Boundary), development should be focused, subject to consideration against other policies of the Local Plan. The site is also located within a designated Economic Growth Area (as depicted by purple dots). The site is outside of, albeit close to a Conservation Area.

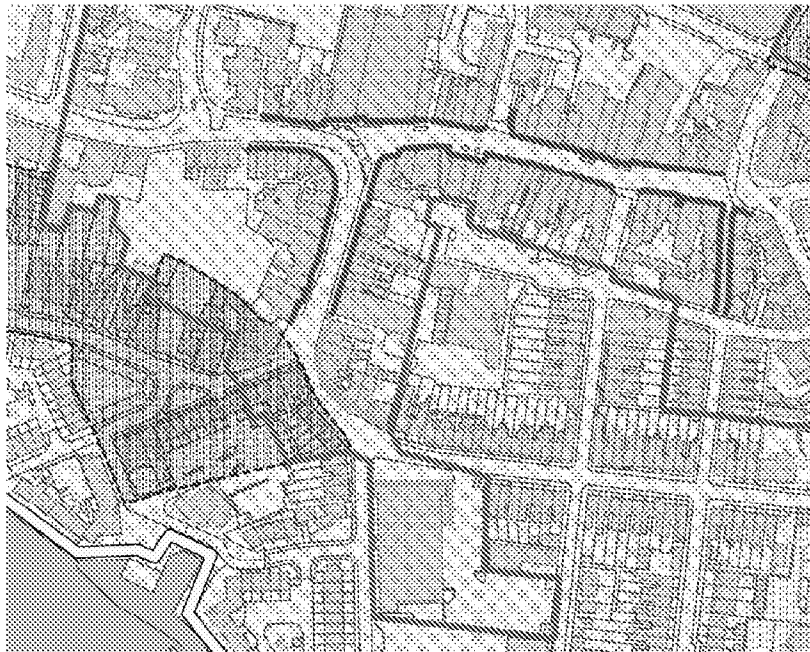


**Fig 7. Extract from Arun Local Plan Policy Map 4: Littlehampton & Surrounding Area
(Littlehampton Town Centre Inset Map)**

- 4.23 The following policies are considered to be of relevance to this proposal:-
- 4.24 **Policy SD SP1** is a general policy, which relates to Sustainable development. It states that *“when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland). This presumption will not be applicable where development requires an Appropriate Assessment or where consideration of the need for one is being undertaken”*.
- 4.25 **Policy SD SP2** relates to the built up area boundaries, noting that *“development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan”*.
- 4.26 **Policies EMP SP1 and EMP SP2** are general policies, which relate to Strategic Economic Growth and Economic Growth Areas respectively.
- 4.27 **Policy TOU SP1** relates to Sustainable tourism and the visitor economy. It states that: *“Sustainable tourism and the visitor economy Sustainable tourism development will be encouraged where it protects as well as promotes the main tourism assets of;*
- a. the waterfronts – the coast, rivers and estuaries,*
 - b. the complimentary visitor uses of the fertile coastal plain in conjunction with agriculture, and*
 - c. the backdrop and access for visitors to the South Downs National Park with the historic town of Arundel as it's focal point, that make the District attractive to visitors.*

Proposals for visitor related development will be determined by Arun's capacity to absorb such growth; for Arun this means tourism growth which:

- a. Encourages long-term visitor interest / activity;*
- b. Ensures a viable visitor economy;*
- c. Provides benefit to local people;*
- d. Extends the visitor season; and*
- e. Protects and enhances the natural and built environment of Arun.*

4.28 Policy TOU DM1 relates specifically to Tourism relates development, stating that:-

"1.Visitor attractions, facilities and accommodation

Proposals for development, including expansion, which are likely to attract visitors (such as leisure or cultural facilities) will be supported provided that they:

- a. are in accessible locations;*
- b. are accompanied by workable and realistic travel plans;*
- c. address visitor management issues; and*
- d. achieve good design.*

Larger scale proposals will generally be directed towards the Economic Growth Areas of Littlehampton and Bognor Regis. Smaller scale development may be suitable in other areas of the District including Arundel.

Excepting Permitted Development Rights or Local / Neighbourhood Development Orders, existing visitor attractions, facilities and accommodation (except camping and caravan sites), will not be granted planning permission for a change of use that leads to the loss of a visitor offer unless it is demonstrated that the use is no longer required and the site is unlikely to be reused or redeveloped for visitor purposes. To demonstrate these requirements, the Council will require:

- e. that alternative visitor uses have been fully explored;*
- f. an appraisal indicating that the use is no longer viable;*
- g. evidence that the site has not been made deliberately unviable; and*
- h. evidence of the suitability of the site to accommodate the alternative use.*

Change of use of camping and caravan sites to other uses, including permanent residential use, will not be permitted, unless the site is allocated for other development within the Local Plan...”

4.29 **Policy D SP1 and D DM1** refers to Design and Aspects of form and design quality respectively.

4.30 The following policies are of a general nature and also considered to be of relevance-

- **Policy HER SP1:** The Historic Environment
- **Policy HER DM1:** Listed Buildings
- **Policy HER DM3:** Conservation Areas
- **Policy T SP1:** Transport and Development.
- **Policy W DM2:** Flood Risk

(iii) Littlehampton Neighbourhood Plan 2014 - 2029

4.31 Littlehampton Neighbourhood Plan was ‘made’ on 5th November 2014. The policies are of a general nature, with none being of specific relevance to the development proposals.



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5. PLANNING HISTORY

a. Application Site

5.1 According to the Council's online planning records, the most recent and relevant planning application on the site is as follows:-

- **Planning ref: LU/52/19/PL/:** Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for a change of use (except Youth Hostel) to A3 (Food & Drive). This application may affect the setting of listed building & may affect the character and appearance of the Littlehampton (River Road) Conservation Area. Application Withdraw - 7th June 2019.

5.2 The application site is also understood to have the following planning history:-

East Bank Visitor Centre, 63-65 Surrey Street, Littlehampton BN17 5AW

- **Planning ref: LU/66/10/NMA:** Application for a non-material amendment following a grant of planning permission LU/49/09/ for alterations to outside seating area. Approved - 20th April 2010.
- **Planning ref: LU/49/09/:** Change of use from public walkway to restaurant additional outside seating area and modification to outside seating terrace (substitution for approved application LU/156/08/). Approved Conditionally - 17th April 2009.
- **Planning ref: LU/156/08/:** Change of use from public walkway to restaurant additional outside seating area & modification to existing outside seating terrace. Approved Conditionally - 16th July 2008.

East Bank Visitor Centre, Littlehampton

- **Planning ref: LU/216/07/:** Change of use from public walkway to restaurant outside seating area and modification to existing outside seating terrace. Refused - 19th July 2007.
- **Planning ref: LU/304/05/:** Internal alterations to relocate kitchen, shop and tourist information centre. Approved Conditionally - 21st December 2005.



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Visitor Centre, East Bank, Littlehampton

- **Planning ref:** LU/360/02/A/: One illuminated fascia sign. Approved Conditionally ADV – 12th February 2003.

Land adjacent to Cairo Club, Surrey Street, Littlehampton

- **Planning ref:** LU/70/00/: Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for visitor centre with residential accommodation. Approved Conditionally – 5th February 2001.



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6. PLANNING ASSESSMENT

a. Principle of development

- 6.1 The development proposals relate solely to the first and second floors of the application building. No changes are proposed to the ground floor. The use of the upper floors has historically been ancillary to the main use of the ground floor as a visitor centre, café, shop and YMCA facility. Up until August 2018, the first and second floor areas of the subject building comprised meeting/ function rooms, as well as office and storage space. These areas, which are the subject of this application, are now vacant. In addition the tourist information facility has now also been largely removed.
- 6.2 Our client wishes to convert the first and second floors to a hotel (Use Class C1). The accommodation would comprise a mixture of 6 No. one and two bedroom units, which would comprise bedroom and bathroom facilities only. No living area and kitchen facilities are proposed as part of the development. The hotel would operate with a remote reception and provide the opportunity for meals to be taken in the café/ restaurant below. The units would be serviced.
- 6.3 As outlined by the LPA's Proposal Map, the site is located within the defined built up area boundary for Littlehampton, on the outskirts of a Town Centre Location, where the principle of development is generally accepted, subject to other policies within the development plan. Further, the site is also located within an identified economic growth area.
- 6.4 **Policy TOU DM1** of the Arun District local Plan relates specifically to Tourism related development. With regard to Visitor attractions, facilities and accommodation it states that: *"proposals for development, including expansion, which are likely to attract visitors (such as leisure or cultural facilities) will be supported provided that they:*



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- a. are in accessible locations;*
- b. are accompanied by workable and realistic travel plans;*
- c. address visitor management issues; and*
- d. achieve good design.*

Larger scale proposals will generally be directed towards the Economic Growth Areas of Littlehampton and Bognor Regis. Smaller scale development may be suitable in other areas of the District including Arundel.

Excepting Permitted Development Rights or Local / Neighbourhood Development Orders, existing visitor attractions, facilities and accommodation (except camping and caravan sites), will not be granted planning permission for a change of use that leads to the loss of a visitor offer unless it is demonstrated that the use is no longer required and the site is unlikely to be reused or redeveloped for visitor purposes. To demonstrate these requirements, the Council will require:

- e. that alternative visitor uses have been fully explored;*
- f. an appraisal indicating that the use is no longer viable;*
- g. evidence that the site has not been made deliberately unviable; and*
- h. evidence of the suitability of the site to accommodate the alternative use.*

Change of use of camping and caravan sites to other uses, including permanent residential use, will not be permitted, unless the site is allocated for other development within the Local Plan".

- 6.5 As detailed above, the application site is located on the edge of Littlehampton Town Centre, in a highly accessible and sustainable location. The proposal will provide high quality tourist accommodation. No external works or alterations are proposed as part of the development. There is an existing Youth Hostel use in part of the subject building (outside the red line of this application, and therefore unaffected the proposed change of use). This establishes that visitor accommodation is

acceptable in this location (albeit a different type to that hereby proposed), and we consider that the proposal will complement this existing, adjacent use.

- 6.6 It is accepted that the proposal would merely result in the loss of meeting/ functions rooms and that in any case these uses are effectively ancillary to the existing mixed usage of the building. As a result, it is our view that the proposed small-scale hotel facility will not result in the loss of a visitor offer, but conversely would result in additional accommodation to serve tourists to the local area. Notwithstanding this point, it is noteworthy that Arun District Council, as the freeholder, have themselves carried out marketing of the premises for in excess of a year period via commercial agents, Fludes. It is understood that there was little or no meaningful interest in the property/use as a going concern. This resulted in the District Council applying to themselves to change the use of the building to an A3 use for the whole building (aside from the Youth Hostel element). On receiving an acceptable offer from our client, this application was withdrawn however.
- 6.7 Given the location of the location of the site on the outskirts of Littlehampton Town Centre, in a highly sustainable location, it is considered that the change of use of the upper floors of the building to a small scale hotel would be wholly appropriate. It is accepted that the development proposals would result in the loss of existing meeting/ functions rooms and ancillary office space, however it is our view that the proposal would make an efficient use of the building space and result in clear economic benefits. Further, as demonstrated by the marketing of the premises, there appears to be no requirement for the existing use in this location. The proposal would represent an acceptable form of development, which would be compliant with policies **Policy SD SP1**, **TOU SP1** and **TOU DM1** of the Arun District Local Plan.

b. Character and Visual Appearance

- 6.8 The application property comprises a three storey building, with attached two storey element to the north side. The proposal seeks to convert the upper floors of the

main building into a hotel (Use Class C1). Our client's intention is to retain the existing building, with the proposed development only requiring minor internal alterations in order to facilitate the proposed change of use. No external alterations or extensions are proposed as part of this application for change of use.

- 6.9 The River Road Conservation Area adjoins the site to the north east. Further, it is recognised that there are a number of Listed Building within the vicinity of the site. Due to the proposal relating to a change of use of the building and internal works only, it is considered that there would be no impact upon these historical buildings or the character and appearance of the River Road Conservation Area. Indeed, the appearance of the building when viewed from public areas of the Conservation Area would remain unchanged from that existing, with no visual harm being resultant.
- 6.10 The application site is located within a predominantly residential area, on the outskirts of Littlehampton Town Centre. The surrounding area is mixed, predominately characterised by terraced and flatted development and as such, a clear planning precedent for residential use is established within this area. Further the building currently incorporates a Youth Hostel, which establishes the suitability of this location to provide visitor accommodation.
- 6.11 The proposal would not detract from the character and appearance of the established surrounding area, nor would it have any impact upon the nearby Conservation Area. In character and appearance terms, the proposals are therefore entirely in compliance with **policies D SP1, D DM1 and HER DM3** of the Arun District Local Plan, and also in accordance with the relevant paragraphs of the NPPF.

e. Residential Amenities

- 6.12 This proposal seeks to convert the first and second floors of the application building from a meeting/ function room and office use, which is ancillary to the mixed use of the entire building into hotel accommodation (6 No. units). No external changes

are proposed as part of the development, with all window openings and positions remaining as existing.

- 6.13 It will be noted that the focus of the proposed accommodation will be to the front south side of the building, which adjoins the road and River Arun. The closest residential properties are positioned to the west side of the site, which will be set away from the main element of the proposal. Indeed, the area closest to this nearby flatted development will retain the lift and lobby area, as per that existing.
- 6.14 Our client is happy for the proposed en-suite windows to be obscure glazed, if the Council considers this to be both reasonable and necessary.
- 6.15 It is accepted that the proposal would result in increased comings and goings to and from the site; however the units will be positioned above a successful and busy café establishment, as well as other mixed uses. Further, the site is on an edge of town center location within an established residential area. It is our view that given the context of the surrounding area, the proposed use would be entirely appropriate and would bring both social and economic benefits in the form of bringing people to their area and associated public spending.
- 6.16 Taking into consideration all of the above, it is our view that the planning proposal would not have a detrimental effect on the residential amenities of the occupiers of any neighbouring dwelling by way of loss of light, overbearing effect nor would it result in the creation of any undue noise and disturbance, and would be fully compliant with Policies **SP1** and **D DM1** of the Arun Local Plan.

f. Access and Parking Arrangements

- 6.17 As per the existing arrangement, the proposed development would have 3 No. parking spaces.



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6.18 We are aware that there are approximately 5 No. additional off road parking spaces close to the site, as well as the nearby Surrey Street car park (79 no. spaces and free parking from 6pm until 8am).

6.19 The application site is located within a highly sustainable location, close to Littlehampton Town Centre. Indeed, Littlehampton railway station is located within 260 yards of the site.

6.20 We can confirm that the following facilities are also within easy walking distance of the site:-

Primary School

River Beach Primary School	500 yards
White Meadows Primary Academy	0.6 miles
St. Catherine's Catholic Primary School	0.7 miles
Lyminster Primary School	0.9 miles

Secondary Schools

The Littlehampton Academy	0.6 miles
The Angmering School	2.8 miles

Doctors

Fitzalan Medical Group	620 yards
Fitzalan Medical Group	0.5 miles
Park Surgery	0.6 miles

Dentist

Pittham Dental Ltd	540 yards
Robert Gorrod	620 yards
Bupa Dental Care, Wick	0.6 miles
Littlehampton Dental Care	0.6 miles

Opticians

Direct Optical	190 yards
20 Twenty Vision Eyecare	280 yards
Thomas H Collison Ltd	390 yards

Hospitals

Arundel & District Hospital	3.3 miles
BMI Goring Hall Hospital	5 miles
Goring Hall Hospital	5 miles

- 6.21 It is our view that due to the **highly sustainable** nature of the site within a central location, together with the fact that on-street car parking is available in this area (including Surrey Street Car Park), then the provision of 3 No. parking spaces would be appropriate for this form of development in this location.
- 6.22 As such, it is our view that the proposal is acceptable from a traffic and transport perspective.

g. Other Matters

- 6.23 As outlined above, the focus of the new NPPF is for development to be sustainable. It sets out there are three principle 'objectives' to achieving sustainable development: economic, social and environmental. In this part of the Planning Statement the main factors that inform the judgement as to whether the proposal would be a sustainable form of development are summarised. In reaching that view all matters referred to in the above report have been taken into account.

Economic Objective

- 6.24 The planning application would result in the creation of construction jobs during the build period. Once completed, the proposals would bring additional tourism to the

area and will help to generate additional public spending. These are all material considerations that weigh in favour of the development. It is considered that the proposal would satisfy the economic role of sustainable development.

Social Objective

- 6.25 As set out in detail above, due to the location of the site within the built-up area of Littlehampton, close to the town centre where there are a number of services, facilities and transport options including a train station, it is considered that the location of the hotel is highly sustainable. Overall it is considered that the proposal would satisfy the social role of sustainable development.

Environmental Objective

- 6.26 There is an overriding need to ensure that development should contribute to protecting and enhancing the natural, built and historic environment. The development would merely relate to a change of use and associated internal works and would have a neutral impact regarding the environmental role of sustainable development, which is our view is appropriate in this instance.

7 CONCLUSIONS

- 7.1 The proposal seeks planning permission for the change of use of the upper floors of the Look & Sea Centre from an ancillary mixed use to a hotel facility, with 6 No. separate rooms. The proposal would merely relate to the change of use and associated internal works and would involve no external works and alterations.
- 7.2 The application site is located within the established built-up area boundary, where the principle of new development is generally accepted, subject to compliance with other policies in the plan.
- 7.3 The application site is located within a highly sustainable area, within easy reach of Littlehampton Town Centre and its host of facilities and services, including Littlehampton railway station.
- 7.4 It is accepted that the proposal would merely result in the loss of meeting/ function rooms and that in any case these uses are effectively ancillary to the ground floor mixed uses of the building. As a result, it is our view that the creation of a small-scale hotel will not result in the loss of a visitor offer and indeed will bring visitor benefits in the form of high quality tourist accommodation.
- 7.5 Further, it is noteworthy that Arun District Council have themselves carried out marketing over the freehold of the premises for in excess of a year via commercial property agents (Fludes). We understand that the Council will be able to source this evidence if it is required. Consequently, it is clear that there is no demand for the existing use in this location.
- 7.6 The River Road Conservation Area adjoins the site to the north east. Further, it is recognised that there are a number of Listed Building within the vicinity of the site. Due to the proposal relating to a change of use of the building and internal works,

it is considered that there would be no impact upon these historical buildings or the character and appearance of the River Road Conservation Area. Indeed, the appearance of the building when viewed from public areas of the Conservation Area would remain unchanged from that existing, with no visual impact being resultant.

- 7.7 It is accepted that the proposal could result in increased comings and goings to and from the site; however the units will be positioned above a successful and busy café establishment, as well as other mixed uses. Indeed, the proposed use will complement the existing ground floor uses and those in adjacent buildings (i.e. the Youth Hostel). Further, the site is on an edge of town centre location within an established residential area. It is our view that given the context of the surrounding area, the proposed use would be entirely appropriate and would bring clear social and economic benefits in the form of bringing visitors to their area with their associated public spending.
- 7.8 It is our view that the planning proposal would not have a detrimental effect on the residential amenities of the occupiers of any neighbouring dwelling by way of loss of light, overbearing effect nor would it result in the creation of any undue noise and disturbance, and would be fully compliant with Policies **SP1** and **D DM1** of the Arun Local Plan.
- 7.9 The existing 3 No. parking spaces will serve the proposal, with additional on-street parking available in the area. It is our view that due to the highly sustainable nature of the site on the outskirts of a town centre location, this level of parking provision in this instance would be acceptable.

- 7.10 The proposal will provide a high quality, sustainable use, which will set a positive benchmark for Littlehampton. It would appear wholly in keeping with neighbouring development and would not detract from the established character and appearance of the surrounding Conservation Area, nor cause demonstrable harm to the residential amenities of any neighbouring property. The proposal would accord with the aims and objectives of national, regional and local policy and guidance, due to the application site being in a suitable location for visitor accommodation, and planning permission should therefore be forthcoming.

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