

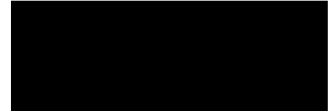
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Planning, building and regeneration
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Dear Sir/Madam,

55A HIGH STREET, LITTLEHAMPTON, BN17 5EJ

SUBMISSION FOR PLANNING PERMISSION FOR A CHANGE OF USE FROM A TRAVEL AGENT (CLASS E (a)) TO A NAIL BAR (SUI GENERIS).

Savills have been instructed by our client, Hendry Investment Ltd c/o Pelham Associates, to submit a planning application for a change of use at 55a High Street, Littlehampton from a travel agent (Class E (a)) to a nail bar (Sui Generis).

This covering letter is submitted alongside the following documents which have been prepared in support of this submission:

- Completed application form; and
- Plans and Drawings.

The relevant application fee (£462) will be paid under separate cover via the planning portal.

Site and Surroundings

55a High Street, Littlehampton is a redundant retail unit (Class E (a)). The previous tenant was TUI Holiday Store who occupied the ground floor but this has now permanently closed. The property is a two storey terrace building, with the ground floor an active commercial frontage, with ancillary use at first floor.

The property is located on the northern side of the high street, is south facing and approximately 0.2 miles to Littlehampton Train Station. The property is allocated within a 'primary retail' location on the High Street, as per the adopted Policy Map (2018). The high street is occupied by a typical mix of independent shops and High Street Brands such as Greggs, Holland & Barratt and WH Smith.

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ARUN DISTRICT COUNCIL LU/70/22/PL



The site also falls within an 'Economic Growth Area' (as identified on the Policy Map 2018) which promotes economic growth and regeneration through focusing on employment, retail, leisure, housing and community services growth. The site falls within a Safeguarded Wharf designation and within flood zone 3.



Policy Map (2018)



Aerial Satellite View of site (Google Maps)



Street View of Site (Google Maps)

Planning History

The planning history of the property is limited in relation to the proposed change of use. The most relevant planning consent to the property is to the application below;

- LU/225/95/B – New shopfront and refurbishment. Passed Conditionally on 15/11/1995.

The adjoining property also shows a relevant historical planning consent below;

- LU/249/19/PL – Change of use of Number 50 High Street, Littlehampton from Retail (A1 Shops) to Licenced Betting Office & Adult Gaming Centre (Sui Generis). Approved conditionally on 06/12/2019.

Proposals

The proposals comprise a change of use is from travel agent (Class E (a) (formerly use class A1)) to a nail bar (Sui Generis).

The proposal also comprises some minor internal alterations by way of removal and reconfiguration of non-structural partitions. Bin storage and space for cycle provision are provided to the rear of the property. The proposals are illustrated on the accompanying proposed ground floor plan.

No alterations to the façade or shopfront are sought under this planning application.

Planning Policy Context

This section outlines the relevant national and local planning policies against which the proposals are considered. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that any planning application must be determined in accordance with the adopted Development Plan for the area unless any material considerations indicates otherwise.

Adopted Development Plan

For the purposes of decision making, the adopted Development Plan for Arun District Council currently comprises the following documents;

- The West Sussex Waste Local Plan 2014;
- The Joint Minerals Local Plan 2018 and the Soft Sand Review
- The Arun Local Plan 2011 – 2031 (July 2018)
- 'Made' Neighbourhood Plans

The main policy consideration is the Arun Local plan 2011 – 2031 which was adopted in July 2018. The Council are currently in the process of preparing an emerging Local Plan, with a Local Development Scheme (LDS) adopted 2020 setting out the anticipated timeframes for its preparation. However, at the time of writing, there are already slippages to the timetable with regards to the Regulation 18 consultation on development policies which was due in Autumn 2021.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) does not form part of the development plan, but is an important material consideration and sets out the Government's planning policies.

The NPPF was revised in July 2021 and maintains the presumption in favour of sustainable development at its heart (paragraph 11). It states, at paragraph 9 that planning policies and decisions should guide development towards sustainable solutions, taking into account local circumstances which reflects the character, needs and

opportunities of each area, This is reinforced throughout the plan which encourages the government to do everything it can to deliver sustainable growth.

Paragraph 38 advises that local planning authorities should approach decisions on proposed development in a positive and creative way. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Section 7 of the NPPF looks at 'Ensuring the vitality of town centres'. Paragraph 86 states that planning policies and decisions should support the role that town centres have in the heart of communities, by taking a positive approach to their growth, management and adaptation. Promoting long term vitality and viability requires allowing town centres to grow and diversity in a way that responds to rapid changes in the retail and leisure industries.

Material considerations

The Littlehampton Neighbourhood Plan 2014 and Arun Parking Standards Supplementary Planning Document 2020 are used as material considerations.

The Neighbourhood plan 2014 aims to provide a framework for how development should look and what it should aim to accomplish and where it is best located. Littlehampton serves as a primary retail location and policy aims to support this. Furthermore, one of the top five priorities for the area is employment thus providing support for the change of use as it will provide continued employment opportunity.

Planning considerations

Principle of development

Policy RET SP1 (Hierarchy of Town Centres) in the Arun Local Plan 2018 looks to support and promote measures which reinforce the role of town centres providing for a range of activities. The focus of Littlehampton is on; retail, leisure, commercial, office, tourism, cultural, community and residential. Providing a range of activity promotes economic resilience for the vitality of the centre. This corroborates with paragraph 86 of the NPPF in relation to how decisions should take a positive approach to town centre growth, management and adaptation.

As such, proposals for town centre uses and changes of use that engender this objective and serve to support and enhance the vitality of the high street and town centre are consistent with Policy RET SP1 and should be supported by the Council in principle.

As the Site falls within the Primary Shopping Area (Policy Map 2018) Policy RET DM1 (Retail Development) needs to be addressed. RET DM1 with regards to town centre uses concerns the change of use from A1 (now E(a)) to A2 (E(c)) or A3 (E(b)), and requires proposals to comply with the requirements of the policy. As a nail bar is Sui Generis, and not A2 or A3 the proposal is compliant with RET DM1. This assessment was found acceptable by the LPA on a similar proposal on a neighbouring unit at 50 High Street (ref: LU/249/19/PL), as set out in the officer report:

Officers note that the proposal falls within the Primary Shopping Area as highlighted on the Arun Local Plan maps. Policy RET DM1 - Retail Development needs to be addressed. Having regard to this policy Officers note Part 2 - Town centre uses within primary and secondary shopping frontages where it

states that changes of use away from A1 retail use will be permitted and subject to a criteria being met, including a viability statement, where the change of use is to professional services (Use Class A2) or food and drink (use Class A3). Therefore, given that a betting and adult gaming centre use is not an A2 or A3 use but rather a sui generis use the proposal is in conformity with the requirements of part 2 of Policy RET DM1 of the Arun Local Plan.

The property's change of use from use class E (a) to Sui Generis will help to strengthen and diversify the mix of uses along the high street, and more widely the town centre. A nail bar is not considered a radical departure from what was formerly the A1 class type use (now E(a)) and is therefore considered a suitable use in this location.

Introducing alternative commercial uses in this location will also help to rejuvenate any stagnating parts of the high street, with high streets having seen macro level decline across the UK more recently, accelerated by the effects of COVID-19. Diversification in the high street, and more importantly realising and re-purposing vacant units on the high street helps to support the vibrancy and vitality of the town centre. Diversification also helps businesses to respond to consumer trends, as recognised in the Arun Local Plan.

Paragraph 8.5.7 of the Local Plan supports this by stating that as lifestyles and working habits change, demands for visitors and tourists have transformed and in turn, Littlehampton may not match contemporary demands. For example, the demand for in store travel agent advice/retail has now declined due to the rise in online services being provided, and more recently the effects of Covid-19. The demand for self-care services/providers such as nail bars has now increased, thus demonstrating how specifically this proposal responds to a rapid change in consumer preferences/demand.

Although a Sui Genris use, a nail bar is an acceptable high street use and one that is very similar to former A class uses.

The proposed development satisfies Policy RET SP1 and RET DM1 in this regard.

Arun's Local Plan strategic objective for Employment and Enterprise is to; 'Strengthen Arun's economic base and provide local job opportunities by increasing, diversifying and improving the quality of employment sites, quality affordable accommodation and the development of business support and partnerships.'

Policy EMP SP2 notes that the town centre of Littlehampton is in an Economic Growth Area. Development will 'provide for additional or enhance commercial and leisure activities, including small scale retail, hotel, café and restaurant uses, and possible an exhibition/visitor centre.'

The current unit is vacant, and so a change of use to a nail bar will retain an employment generating use within the unit, positive for the vitality of the high street and town centre. Such proposals are listed as one of the options for the re-use of sites (Paragraph 8.7.7 of the Local Plan). The proposals are considered compliant with Policy EMP SP1 and Policy EMP DM1.

The proposals are therefore considered acceptable in principle against the policies contained in the adopted Local Plan.

Flood risk

The site falls within Flood Zone 3 (not a functional flood plain) according to the Flood map for planning (Gov.uk).

The proposed change of use would comprise less than vulnerable development with regards to the Guidance entitled: 'Review individual flood risk assessments: standing advice for local planning authorities' and therefore

the Environment Agency won't need to be consulted. The change of use at the site would not have a detrimental impact on the risk of flooding at the site, as visitor numbers are not expected to significantly increase as a result of the change of use. The means of evacuation in the event of a flood would be consistent to the use of the unit prior to the change of use, and therefore there is no change in flood risk at the property. The proposals will therefore comply with Policy W DM2 of the Arun Local Plan in this regard. The acceptability of such an assessment is confirmed in the officer report of LU/249/19/PL when discussing flood risk at Nos. 48 and 50 High Street.

Refuse

The plans propose refuse in the form of wheelie bins to the rear of the site on the ground floor, served by an access road accessed through the Anchor Springs Public Car Park. The space allocated for refuse is considered sufficient.

Vehicular and cycle provision

Policy T SP1 seeks to ensure that development: provides safe access on to the highway network; contributes to highway improvements & promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network. It also requires consideration of parking provision in relation to new development.

The site is situated within a highly sustainable location in the town centre, accessible by bus and train, and is in proximity to a number of public car parks to serve users travelling by car.

With space for vehicular parking to the rear, ample provision of public car parks and a site accessible on foot and by public transport it is considered the proposal would comply with T SP1.

Within Policy RET DM1, town centre uses which accord with the existing hierarchy of retail centres will be permitted if they include provision for access by cycle and on foot. Provision of cycle parking should be designed to be safe and secure and be in accordance with national guidance (Policy DM2). The rear of the site on the ground floor can serve to provide sufficient cycle storage. The development will make cycle provision in accordance with adopted standards.

It is therefore considered the proposal will comply with Policy SD SP1 and Policy RET DM1 of the Local Plan.

Conclusion

This Planning Cover Letter has been prepared to support a change of use from a travel agent (use class E (a)) to a nail bar (Sui Generis) for 55a High Street, Littlehampton.

The proposals will involve minor internal alterations by way of removal and reconfiguration of non-structural partitions. The current retail unit is redundant. It will support and enhance the vitality of the high street through strengthening the diversity mix of uses along the high street and reinstate the occupancy of the unit. A nail bar is not considered to be a radical departure from typical A class uses (now class E) and is therefore a suitable use within the location. Moreover, the proposed use will help provide and sustain local job opportunities and drive economic growth.

This statement has found that the proposals are in full conformity with the adopted development plan and other material considerations, and represent a sustainable development and one that promotes the vitality of town centre by responding to rapid changes in the retail and leisure industries, in accordance with the NPPF. As a result, the development proposals should be considered positively, with a view to granting planning permission.

We would be grateful if you could acknowledge receipt of this application and if you have any queries or require additional information please do not hesitate to contact me using the details found at the header of this letter.

Yours faithfully,



Rory Baker
Senior Planner
Savills (UK) Ltd