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Planning Statement

**Land to the West of New Courtwick
Lane, Wick, Littlehampton**



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Project Name: Wick, Littlehampton

Location Land to the West of New Courtwick Lane, Wick,
Littlehampton

Client: NCL Estates Ltd

File Reference: P1998

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1. Introduction

- 1.1. This Planning Statement has been produced by ECE Planning on behalf of our clients, **NCL Estates Ltd** in support of the Hybrid Planning Application for the redevelopment of the site at Land West of New Courtwick Lane, Wick, Littlehampton, BN17 7RZ, to deliver a new retail facility and industrial area across two phases.
- 1.2. The description of development reads:
- Hybrid Planning Application comprising of the following;***
- Full Planning Application for Phase 1 (East of the Site) for a food store (Use Class E(a)), Two no. Drive-Thru food / beverage units (Sui Generis) with revised vehicular access, associated parking and landscaping;***
- And;***
- Outline planning application for Phase 2 (West of Site) comprising development of Approximately 8,800sqm GIA Light Industrial / Storage and Distribution (Use Class E(g)(iii) / B8). (All matters reserved except for access).***
- 1.3. The proposals seek to redevelop a vacant, brownfield site within a highly sustainable location north of the A259. The proposed development will deliver an Aldi Food store, Costa and McDonalds drive-thru facilities, and up to 8,800sqm of Light Industrial floorspace, bringing significant socio-economic benefits to the area through this under-utilised site.
- 1.4. The planning submission will be a Hybrid Application, to be delivered across two phases of development:
- Phase 1 (Full Planning) – Redevelopment of the East of the site to deliver a retail facility (hereby referred to as East Site)
 - Phase 2 (Outline Planning) – Redevelopment of the West of the site to deliver a mix of trade counters, light industrial and storage units (hereby referred to as West Site)
- 1.5. Pre application advice has been sought from Arun District Council in relation to the proposed development. Written feedback was received on 30 November 2023, and is shown in Appendix A. This application has responded to comments raised by Arun District Council to produce a high-quality development with robust justification to support the principle of development.
- 1.6. This statement will consider relevant background for the determination of the Hybrid Planning Application including a description of the site and its surroundings, the planning history, relevant planning policy and an appraisal of the proposal in planning terms for both the Full and Outline Phases.

2. The Site

- 2.1. The Site is located in the Built-up Area Boundary of Wick, Littlehampton. The site is bounded by Courtwick Lane (to the north), New Courtwick Lane (to the east), Henry Lock Way (to the south) and Ernest Fitches Way (to the west). The Site is identified as two separate areas - the 'East Site' and the 'West Site' as shown in Figure 1, below:



Figure 1 - Application Site Plan showing East and West Site



Figure 2 - Aerial Imagery of the Site

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- 2.2. The site as a whole is vacant and consists of an area measuring approximately 4.7ha. The East Site comprises a large, two-storey, former production facility with 3,450m² of B8 floor area and 2,694m² of office space.
- 2.3. The building, used by EuroTherm is surrounded by hardstanding, grassland, shrubs and hedgerows (shown in Figure 2 and 3).
- 2.4. The site is served by two vehicular access points from New Courtwick, shown below in Figures 3 and 4.



Figure 3 - Access to Site from South of New Courtwick Lane



Figure 4 - Access to Site from North of New Courtwick Lane

- 2.5. The West Site is a former nursery, which has been left vacant for a significant period of time. It is important to note that half of the West Site has been allocated for employment development within the Littlehampton Neighbourhood Plan (Policy 7). This is shown in the snippet of the LNP Policy Map below (Figure 5).

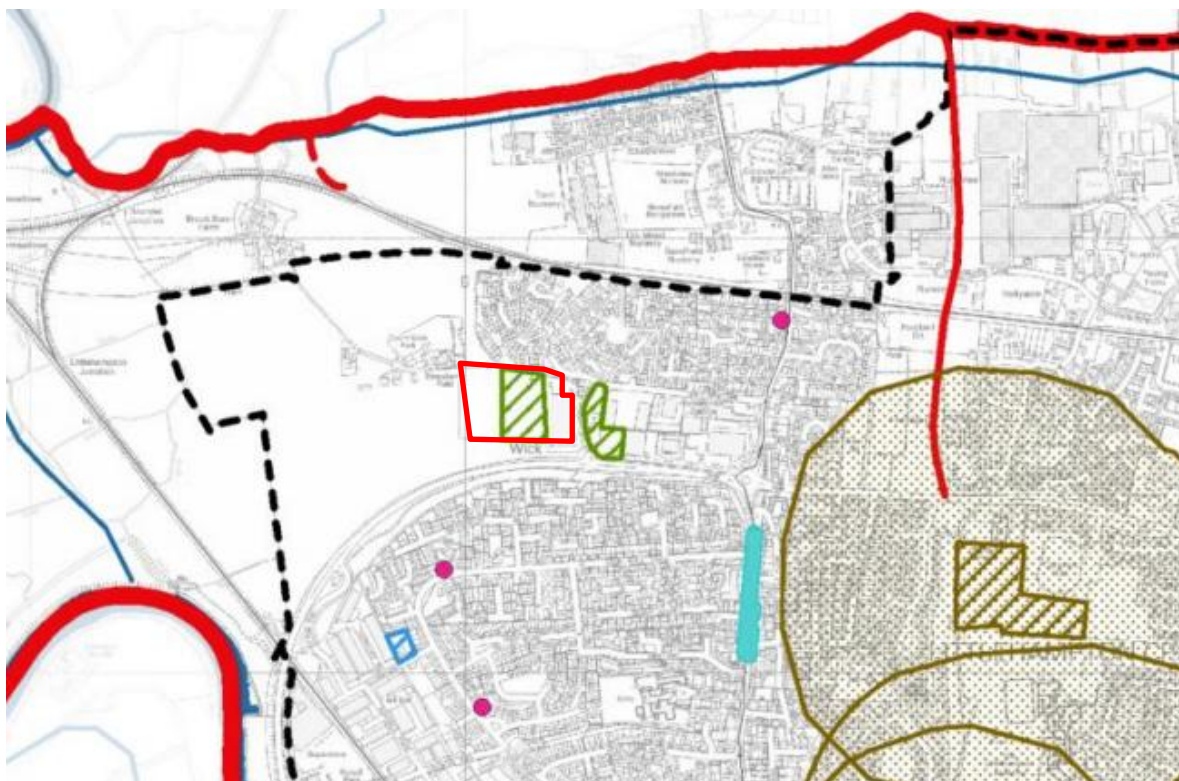


Figure 5 - Littlehampton Neighbourhood Plan Policy Map (Policy 7 in Green-Hatch, Site outlined in Red)

- 2.6. The West Site contains areas of hardstanding that are now overgrown. There are trees and hedgerows bounding the site, with areas of woodland within the northeast and southwest corners of the West Site, and areas of grassland and scrub located throughout (Shown in Figure 2).
- 2.7. There is a former vehicular access from Courtwick Lane (to the north) to this part of the site, that now serves as a pedestrian access onto the West site.
- 2.8. A line of trees running North-South between the East and West Site, forms a separation buffer between the sites. There is a drop in levels between the two sites, with areas of retaining wall along this tree line. The East Site sits lower than the West site, with a level change of 3m from the further west to most eastern side.
- 2.9. The entire site is located in Flood Zone 1, and is at very low risk of surface water flooding.

Surrounding Context

- 2.10. Within the wider area, the site is bounded by residential uses to the north and west with a retail/light industrial context moving eastwards, this is shown in Figure 5 below.
- 2.11. To the South is Henry Lock Way and the A259 Littlehampton Road beyond this. The land sandwiched between these roads is vacant, scrubland.
- 2.12. The A259 is a busy road, connecting to site eastwards towards Worthing and Brighton, and westwards towards Littlehampton.

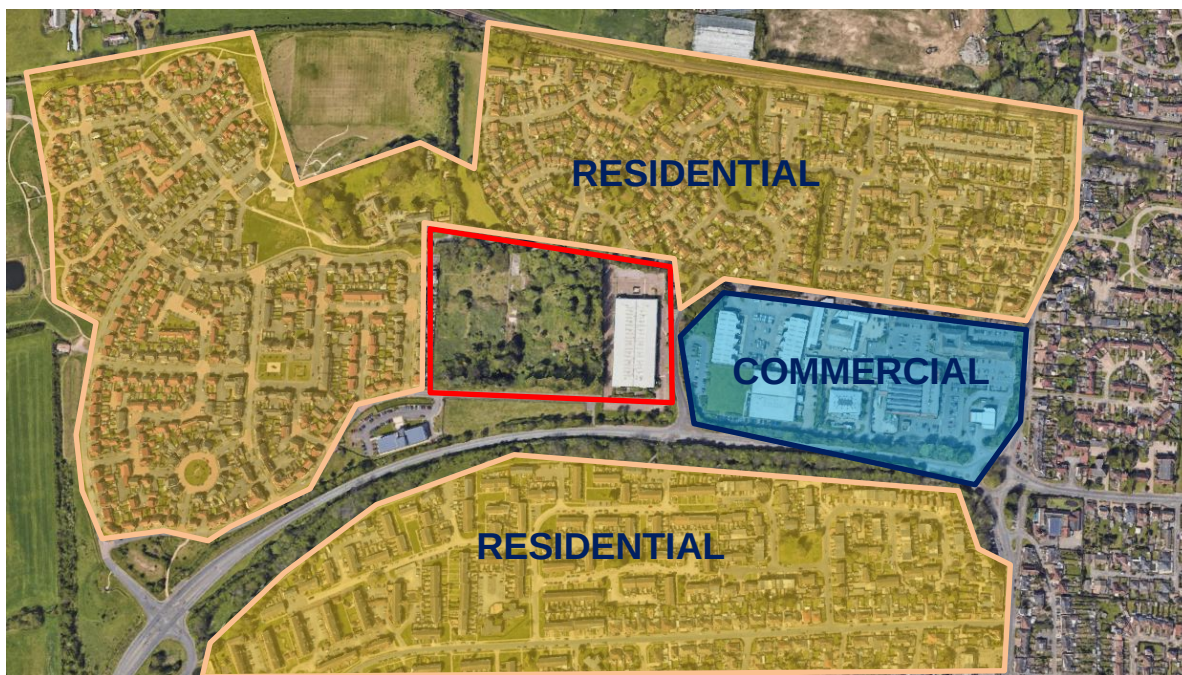


Figure 5 - Surrounding Context of Site

- 2.13. To the northeast of the site, immediately adjacent at the junction of Courtwick Lane and New Courtwick Lane is a three-storey block of residential flats, accessed from Courtwick Lane called Millfield Court (shown in Figure 6). This is the closest residential relationship with the site and can be seen in the aerial imagery of Figure 2, adjacent to the existing warehouse site.



Figure 6 - Streetview Imagery of Millfield Court

3. Planning History

3.1. The East Site was formerly occupied by Eurotherm Drives/Parker S SD Drives Ltd and has been vacant since at least January 2022 and the West Site was a horticultural nursery until 2000.

3.2. There is limited planning history listed on the online planning register, with the following applications considered relevant to the proposal:

LU/270/97 - 2 No. industrial units (6,403 square metres each gross external) including ancillary offices and staff facilities, to be constructed in two phases. New Courtwick Lane, Littlehampton. Approved Conditionally.

LU/232/91 - Approval of reserved matters following LU/324/90 for development for business and ancillary Use Class B1. Land at Courtwick Park, North of Littlehampton Bypass, Littlehampton. Approved Conditionally.

LU/324/90 - Outline Application for business development (Class B1) and ancillary use, Land at Courtwick Park, North of proposed Littlehampton By Pass. Approved with S106.

Pre-Application Advice November 2023

3.3. Pre-Application was sought from Arun District Council (ADC) on 13 October 2023 for the redevelopment of the industrial site for a retail food store and two drive-thru units (east site) and to redevelop the former horticultural site to the west (west site) with new industrial development.

3.4. The pre-application advice received included comments from a number of ADC Consultees including:

- **ADC Environmental Health** – stated that a noise and air quality assessments will be required.
- **ADC Tree Officer** - raised no immediate concerns.
- **ADC Landscape Officer** - stated a need for additional landscaping/screening.
- **ADC Ecologist** - noted the loss of habitat for birds, reptiles, hedgehogs, and possibly bats, and advised that there is a need to consider the impact on the Arun Valley, and a need to provide a Biodiversity Net Gain (BNG) Assessment, and mitigation for habitat loss. A phase 1 habitat survey will be required along with any necessary species specific surveys.
- **ADC Economic Development** – supported the industrial development but not out of centre retail.
- **ADC Drainage** - no immediate concerns provided adequate surface water drainage supporting information is provided with the application.

3.5. The written response received from the planning officer advised that the principle of the industrial use of the West Site is considered acceptable, along with the proposed drive-thru's on the East Site. The Planning Officer outlined that the proposed new food store would not be supported by officers, however outlined that the applicant would need to demonstrate this need through sequential and impact testing requirements.

3.6. The Planning Officer advised that the best approach would be for the East and West sites to come forward at the same time (as a hybrid application) to allow the assessment of the site as a whole and to demonstrate that the existing industrial use of the East Site is not currently deliverable or viable, and to demonstrate that the proposed industrial use of the West Site will not pose insurmountable harm to the environment or local amenity.

3.7. The Pre-Application written response is attached at Appendix A.

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West Sussex Highways Advice - December 2024

- 3.8. Pre-Application advice has been sought from West Sussex County Council Highways Authority, to agree the approach and methodology for assessment of the site, including proposed delivery and servicing strategy, proposed parking strategy and proposed methodology for the traffic assessment.
- 3.9. Advice has been received from WSCC Highways who accept the proposed approach and methodology and requested additional cycle lanes along New Courtwick Lane leading onto the site.
- 3.10. These advise has been incorporated into the final layout. Please refer to the supporting Transport Assessment for further information.

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4. The Proposal

4.1. The proposed development comprises two phases:

- Phase 1 (Detailed Design) - The demolition of the existing industrial building on the East Site and construction of a Retail Food Store (Use Class E) and two Drive-thru facilities (sui generis), with associated parking and landscaping.
- Phase 2 (Outline Only) – The erection of up to 8,800sqm of industrial floor space, with associated landscaping, parking and access from the East Site.

4.2. The overall Masterplan is shown below in Figure 7.

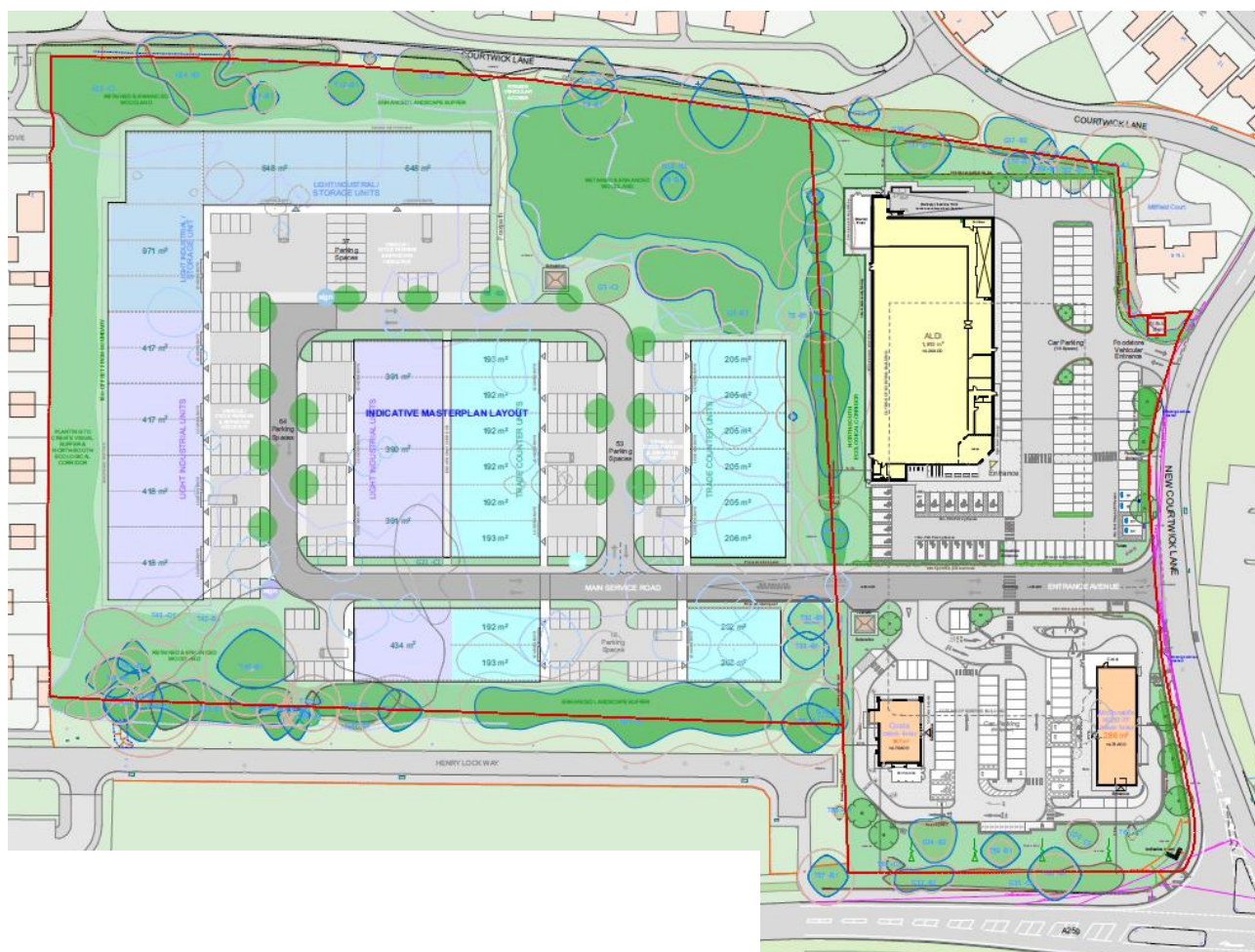


Figure 7 - Proposed Site Masterplan

Phase 1 – East Site

- 4.3. The existing warehouse building on the East Site will be demolished, and replaced by a 1,912m² Food Retail Store to the north of the site, and two drive-thru facilities to the south.
- 4.4. The existing two access points from New Courtwick Lane will remain in their general locations, with the northern-most access point facilitating the Food Retail Store and the southern access point facilitating a large through-road, running east to west to facilitate access to the West Site. Both access points will be amended to facilitate both vehicular and pedestrian access, with additional cycle access provided for the southern access point.

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4.5. The two drive-thru's will be accessed from a smaller road connecting to the south of the through-road. The Food Retail area will only be accessible from the northern-most access point on New Courtwick Lane.

4.6. The existing pavement along New Courtwick Lane will be widened within the red line boundary, to allow for a cycleway from the A259 towards the site access points.

Retail Food Store

4.7. The Food Retail Store area will comprise a 1,912m² store, with an internal lobby space, sales floor, staff room and WCs, office space, and warehouse storage with fridge and freezer facilities (located at the northern end of the building).

4.8. The building will sit approximately 20m from the existing tree line that separates the East and West Site, separated by an enhanced landscape buffer zone to the west and north of the building.

4.9. The building itself will measure approximately 6m in height, down to 4m in height, with a mono-pitched roof line. The building will feature a range of high quality cladding materials including metal, glazing, brick and timber, with metal mono-pitched roofs

4.10. To the immediate north of the building will be a service area for deliveries, with a loading bay and bin store. A roller shutter door will facilitate the back-of-house warehouse area, and will be accessed via a 1:18 gradient ramp.

4.11. An External Plant Compound will be located to the northwest of the building. This will be a walled compound with acoustic design to mitigate against the impacts of plant noise.

4.12. A canopied trolley cart bank will be located to the south of the store entrance.

4.13. The carparking area will be located to the east and south of the Food Retail Store, comprising 118 parking spaces, including 6 disabled bays, 12 family bays and 6 active EV charging bays. Along the south of the carpark, 10 spaces have been allocated for future EV charging (passive spaces). 8 cycle spaces are proposed to the south of the store entrance.

4.14. All existing trees will remain on the East Site, with the exception of four C Grade trees (T62, T63, T46, T65), located on the proposed area of hardstanding for McDonalds. In addition a poplar tree (T31) is proposed to be removed along the East Site/West Site boundary to facilitate future access for Phase 2.

4.15. All existing trees along the northern boundary and the hedgerows bounding Millfield Court will be retained, with the existing substation retained.

4.16. Additional landscaping is proposed around the carparking areas, with new tree planting along the New Courtwick boundary line.

4.17. A new pedestrian crossing is also proposed outside of the red line boundary to facilitate access for pedestrians.

Drive-thru Facilities

4.18. Two drive-thru's will be located to the southern half of the site, accessed from the central through-road. The western-most drive-thru for a coffee retailer, and the eastern-most for a restaurant chain.

4.19. The coffee drive-thru will measure 167sqm in GIA, with a service area to the south. The restaurant drive-thru will comprise a 286sqm building, with a service area to the north.

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- 4.20. The proposed internal roads will circle around the two drive-thru units going clockwise, with parking located between the two units. The car parking area comprises 50 car-parking spaces, including 4 disabled spaces, and 4 EV charging spaces.
- 4.21. The area surrounding the drive-thru lane and car parking area will be landscaped, with new street trees fronting New Courtwick Lane, and an enhanced planting to the existing grass verge to the south of the site.
- 4.22. A substation is proposed to the northwest corner of the drive-thru area, to the south of the through-road.

Phase 2 – West Site

- 4.23. Phase 2 of the site comprises an Outline Planning Application. This Outline seeks to establish the principle of development on the West Site. Therefore the proposed masterplan layout is indicative at this stage. The details of development (including Appearance, Landscape, and Layout) will be approved at Reserved Matters Stage. Access to the site will be approved under the Outline application.
- 4.24. The proposed access to the West Site will be via the central through-road on the East Site. The main service road will loop internally around the centre of the facilitating the proposed light industrial units.
- 4.25. Up to 27 units are proposed ranging in GIA from 192sqm to 971sqm (a total of up to 8,800sqm) to facilitate a range of trade counters, storage facilities and light industrial uses (Use Class E(g)(iii) / B8).
- 4.26. The proposed masterplan includes six blocks, with a court yard arrangement for parking outside each unit to facilitate customer/staff parking and service and access into each unit. Across the Masterplan 172 parking spaces are proposed.
- 4.27. The western-most industrial building is an L-shaped design, orientated towards the east, siting as a buffer between vehicle movements and the existing residential dwellings along Ernest Fitches Way.
- 4.28. Enhanced landscaping buffers are proposed across all boundaries, with the largest swaths of woodland to the southwest and northeast of the West Site remaining.
- 4.29. Several trees are proposed to be removed within the centre of the site, however all existing trees along the boundary will remain in situ.
- 4.30. The existing pedestrian access to the north of the site from Courtwick Lane will be enhanced to allow pedestrian movement through the site to the trade counter units, and across to the East Site for the retail and drive-thru facilities.

5. Policy Overview

5.1. Introduction

- 5.1.1. Section 38(6) of the Planning Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations otherwise. In this case the Development Plan for the area consists of the following:

Arun Local Plan 2011-2031 (2018)

Littlehampton Neighbourhood Plan 2014-2029 (2014)

- 5.1.2. Material Considerations include the National Planning Policy Framework, and National Planning Practise Guidance.

5.2. National Planning Policy Framework (NPPF)

- 5.2.1. Updated most recently in December 2024, the following are considered the most relevant sections of the Framework applicable to the proposed development and is a material consideration of significant weight:

Chapter 2 – Achieving Sustainable Development

Chapter 8 – Promoting Healthy and Safe Communities

Chapter 9 – Promoting Sustainable Transport

Chapter 11 – Making Efficient Use of Land

Chapter 12 – Achieving Well Designed Places

Chapter 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

Chapter 15 – Conserving and Enhancing the Natural Environment

5.3. National Planning Practice Guidance (NPPG)

- 5.3.1. The PPG was published by the Government in March 2014 and is updated regularly. The PPG supplement those overarching objectives of The Framework and is also a material consideration.

5.4. Arun Local Plan (2018)

- 5.4.1. The adopted Arun Local Plan 2018 sets out the strategic vision, objectives, policies and proposals for the development of the LPA to 2030 and beyond. The following policies in the Local Plan are considered relevant to this application but are not explored in detail in this Statement:

Policy D DM1 - Aspects of form and design quality

Policy D SP1 - Design

Policy ECC SP1 - Adapting to Climate Change

Policy ECC SP2 - Energy and climate change mitigation

Policy EMP DM1 - Employment Land: Development Management

Policy ENV DM1 - Designated Sites of Biodiversity or geographical imp

Policy ENV DM5 - Development and biodiversity

Policy INF SP1 - Infrastructure provision and implementation

Policy QE DM1 - Noise Pollution

Policy QE DM2 - Light pollution
Policy QE DM3 - Air Pollution
Policy QE DM4 - Contaminated Land
Policy QE SP1 - Quality of the Environment
Policy RET DM1 - Retail development
Policy RET SP1 - Hierarchy of Town Centres
Policy SD SP1 - Sustainable Development
Policy SD SP2 - Built-up Area Boundary
Policy SKILLS SP1 - Employment and Skills
Policy T SP1 - Transport and Development
Policy W DM2 - Flood Risk
Policy W DM3 - Sustainable Urban Drainage Systems

5.5. Littlehampton Neighbourhood Plan 2014-2019 (2014)

- 5.5.1. The following policies are considered to be relevant to this proposal. However, as these were based on the Arun Local Plan 2003, which is now superseded, this has an impact on the weight of the policies.

Policy 1 – The Presumption in Favour of Sustainable Development
Policy 2 – A Spatial Plan for the Town
Policy 7 – Business Land Allocation
Policy 22 – Design of New Development

5.6. Emerging Arun District Local Plan

- 5.6.1. Arun District Council is currently preparing a Draft Local Plan for future development of the District in the years 2023-2041. The Draft Local Plan is currently at the Issues and Options Stage, with a consultation carried out during 25 March 2024 until 13 May 2024.
- 5.6.2. The Draft Local Plan is in the early stages of preparation and therefore does not carry any weight in relation to this application.

5.7. Supplementary Planning Documents

- 5.6.3. The following Supplementary Planning Documents are relevant to this application:

SPD11 Arun Parking Standards 2020
SPD13 Arun District Design Guide (SPD) January 2021

6. Planning Appraisal

6.1. Introduction

- 6.1.1. This section of the statement details how the proposed development complies with the policies set out within the Development Plan. The following matters are the principle considerations with regards to the proposal and where relevant have been separated out into the East and West Site:

Principle of Development

Retail Development

Economic Development

Design, Form and Appearance

Transport, Highways and Parking

Residential Amenity

Landscape

Arboriculture

Biodiversity and Ecology

Noise Assessment

Air Quality

Sustainability

Flood Risk and Drainage

Land Contamination

Archaeology

6.2. Principle of Development

- 6.2.1. The application site is located within the Built-up Area Boundary (BUAB) of Wick, and is a previously developed, brownfield site. Therefore the principle of development at this location is considered acceptable.
- 6.2.2. With regards to the West Site, Policy 7 of the Littlehampton Neighbourhood Plan allocates 'Land adjacent to the new Courtwick Estate' for employment development, with the allocation covering half of the West Site (shown in Figure 3 above). Even taking account of the lack of an allocation on the western half of the West Site, the site being in the BUAB means that the principle of development on the whole of the West Site is considered acceptable.
- 6.2.3. It is also acknowledged that within the pre-application feedback, the ADC Business Development Manager was supportive of the industrial units, outlining that Arun has '*an aging supply and modern units are encouraged.*' In this regard, the development of industrial units to the West Site is considered entirely acceptable in principle.
- 6.2.4. The East Site comprises an existing industrial building (approx. 6233GIA) and car park area currently leased to Amazon.
- 6.2.5. Paragraph 125 (c) of the NPPF gives substantial weight to the re-use of previously-developed, brownfield land and the proposed East Site development would bring this site back into active use, therefore affording substantial weight to the proposal.

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6.2.6. Policy EMP DM1 of the Arun Local Plan provides protection to the existing industrial development, however Part 2 of the policy states that redevelopment for non-employment purposes will not be allowed unless:

(a) it is demonstrated that the site is no longer required and is unlikely to be re-used or redeveloped for industrial/commercial purposes.

(b) the existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved.

6.2.7. With regards to criterion a, the existing building was purpose built for the previous occupier in 1990, however has been left vacant for several years. The building has been marketed for re-sale/lease since January 2022, however there has been no interest from a commercial occupier.

6.2.8. This is supported by marketing evidence provided by Fludes, which demonstrates that the existing industrial site is no longer required and unlikely to be re-used in its current form, in line with criterion (a) of Policy EMP DM1.

6.2.9. With regards to criterion b, this is not considered relevant to this site.

6.2.10. It is important to note, that whilst the proposed retail use for East Site is not considered industrial/commercial with regards to Policy EMP DM1, a retail store of this size would generate approximately 40 FTE jobs, with the drive-thru units generating approx. 70 FTE jobs between them.

6.2.11. Therefore, the proposed East Site development would generate significant employment opportunities, bringing socio-economic benefits to the area. In our view, this is a strong material consideration weighing in favour of the development.

6.2.12. As a result of the above, the proposal would be able to demonstrate a positive contribution to meeting the economic needs of the area and would make a viable use of a vacant site, complying with Policy SD SP1 of the ALP and Policy 1 of the LNP.

6.2.13. In addition, when considering the principle of replacing the existing vacant industrial building with retail development at the East Site, the site must be considered as a whole. The full scope of the development would see the existing industrial floorspace, replaced and enhanced with an increased quantity of storage (Use Class B8), light industrial (Use Class E[g][iii]) and trade counter (Use Class B8) uses to the West Site. Therefore, there would be no loss of employment floorspace within Arun District, but significant job creation as a result of the proposals.

6.2.14. In this regard, the East and West site must be considered together (as advised by the Planning Officer within the pre-application advice) through a hybrid planning application.

6.2.15. To summarise, the principle of development at this site is considered acceptable, by virtue of redeveloping and enhancing a vacant brownfield site, providing significant job creation and maintaining industrial employment across the site as a whole. The proposed development accords with the requirements set out within Policy SD SP1 and Policy EMP DM1 of the ALP, Policy 1 and Policy 7 of the LNP, and is supported by the NPPF.

6.3. Retail Development

6.3.1. The retail elements of the proposed development comprise a Food Store (Use Class E) together with 2x drive thru units (Sui Generis retail use) at the East Site. The applicant has demonstrated a clear market demand for these units in this location.

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- 6.3.2. As detailed in Section 3 (Planning History) of this Report, the pre-application advice received from ADC advised that they would need detailed evidence to justify a new retail store in this location. However, ADC are accepting of the proposed drive-thru units.
- 6.3.3. Within the pre-application advice, the Officer outlined that the proposed retail food store use can be supported through robust justification, specifically a sequential assessment and Retail Impact Assessment.
- 6.3.4. Policy RET SP1 of the ALP states Bognor Regis and Littlehampton will be the main focus for retail, leisure, commercial, office, tourism, cultural, community and residential development. However, it is important to note that the supporting text (Paragraph 9.1.4) also identifies that “*large numbers*” of Arun’s residents travel outside the district for shopping, leisure and entertainment purposes, therefore demonstrating that there is a greater retail need within the district.
- 6.3.5. Policy RET DM1 (3) states that ‘*proposals for Town Centre uses outside the centres defined on the Policies Maps will only be permitted if:*
- a. The scheme meets the impact tests of the NPPF.*
 - b. The scheme is easily accessible by the highway network and public transport.*
 - c. The scheme includes provision for access by cycle and on foot.*
 - d. The scheme includes appropriate provision to enable access for people with disabilities.*
- Applicants proposing retail development on out of centre sites will demonstrate that no suitable site can be found, firstly within the existing town centre or, secondly, on the edge of the centre.*
- 6.3.6. As such, a Sequential Test has been undertaken by Quod, provided within the supporting Retail Impact Assessment. This sequential test reviews available sites, within a reasonable area of search, capable of providing the same parameters as this proposal.
- 6.3.7. Within the pre-application advice, a number of sites were also offered for consideration as alternative locations for a retail food store. This included the existing Waitrose store in Littlehampton Town Centre. This site has been considered at paragraphs 3.39 to 3.56 of the Retail Impact Assessment.
- 6.3.8. This site is particularly relevant as, it was granted planning permission (LU/214/20/PL) on 1 March 2021 for the ‘*Demolition of existing buildings & redevelopment comprising 36 No. residential units (Class C3) & flexible commercial floorspace (Class A1, A2, A3 and/or D1) together with the provision of car & cycle parking, landscaping & associated works (resubmission following LU/3/19/PL)*’. Of note within the decision notice, is that the application ‘*affects the setting of listed buildings & may affect the character & appearance of the East Street, Littlehampton Conservation Area*’ of which it is sited immediately adjacent to.
- 6.3.9. As demonstrated within LU/214/20/PL Committee Report, the existing Waitrose site is inappropriate as a location for a retail store due to its negative impact on the adjacent Conservation Area and nearby listed buildings. The current building is overly large, architecturally unremarkable, and visually intrusive, failing to complement the historic character of its surroundings. This was explicitly acknowledged in the committee report for the approved redevelopment of the site scheme, which identified the Waitrose building as obtrusive and detrimental to heritage assets, including Avon House and the East Street School.

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- 6.3.10. The approved scheme for redevelopment (LU/214/20/PL) took a considered approach, replacing the single bulky structure with three smaller, well-designed buildings that integrate more harmoniously with the Conservation Area. Features such as gabled roofs, traditional materials, and increased permeability through the site were specifically designed to mitigate heritage impacts and improve the setting of adjacent listed buildings.
- 6.3.11. The committee report highlighted these benefits, particularly the reduction in building size across three smaller buildings, noting the improved streetscape, enhanced views, and the contribution to the Conservation Area's character. However, as established within the Retail Impact Assessment, the proposed reduced scale of retail at this site, would not be appropriate for an Aldi Store. In addition, the proposed levels and location of parking, servicing and deliveries down a one-way street and secondary location with limited commercial frontage, make this site an unviable location for a larger retail store such as Aldi.
- 6.3.12. This permission is now extant, and the site is not being actively marketed. Therefore, if Aldi were interested in moving to this site, a new permission would be required. Given the substantial heritage feedback provided during the application, and the noted improvements of the reduced scale, mixed use scheme, a proposal for a retail store requiring a single large building, such as Aldi, would not achieve these heritage-sensitive improvements.
- 6.3.13. The scale and design needed for such a store would replicate the bulk and dominance of the existing Waitrose building, perpetuating or even exacerbating the harm to the surrounding historic environment. Furthermore, it would lack the public benefits of the approved scheme, such as the introduction of residential units to support the vitality and viability of the town centre and the better integration of the site into its historic setting.
- 6.3.14. Overall, redeveloping the Waitrose site as a retail store would fail to address the longstanding issues associated with the existing building and would result in a level of harm to heritage assets that far outweighs any potential public benefits.
- 6.3.15. The Retail Impact Sequential Assessment considers additional sites alongside this, including Land north of Toddington Lane (adjacent to Lyminster Bypass), Land West of Brook Lane and South of A259, and the 'Bodyshop site', Watersmead Business Park, discounting all as an appropriate alternative location for an Aldi Store. Therefore, the proposed development satisfies the sequential approach as set out in national planning policy and required by Policy RET DM1 of the Local Plan.
- 6.3.16. With regards to Policy RET DM1, the proposed development satisfies all of established criteria outlined in paragraph 6.3.5 of this report.
- 6.3.17. The supporting Retail Impact Assessment outlines how the scheme meets the impact tests established within the NPPF, and demonstrates that the likely trading effects of the proposal will not be significantly adverse (the policy test) either on planned future investment or vitality and viability of neighbouring centres (including Littlehampton and Rustington) (criterion a).
- 6.3.18. The proposed development is located in a highly sustainable location, immediately adjacent to the A259, a major thoroughfare within the district with close public transport links including bus routes for the 700 and 9 within under ten minute walking distance, and Littlehampton Railway Station within 15 minute walking distance (criterion b).
- 6.3.19. The proposed development includes provision for access by cycle and on foot, with 8 cycle parking spaces proposed at the entrance to the retail store, and improved pedestrian access at both East Site entrances, as well as a proposed new pedestrian crossing along New Courtwick Lane (criterion c).

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- 6.3.20. The proposed development also includes appropriate provision to enable access for people with disabilities, providing six disabled parking spaces as well as 12 family parking spaces (criterion d).
- 6.3.21. Therefore the proposed development meets all the criteria outlined within Policy RET DM1, and is considered an entirely appropriate location for retail development. A retail store in this location will provide regeneration to this prominent site, deliver improved customer choice and competition and will provide significant employment opportunities.

6.4. Economic Development

- 6.4.1. ALP Policy EMP SP1 (Strategic Economic Growth) seeks to promote sustainable growth of Arun's economy to meet needs of various economic sectors. Policy SKILLS SP1 (Employment and Skills) states that the Council will encourage development proposals that raise skill levels and increase employability, tackle skill shortages in existing or potential business sector clusters and address barriers to employment for economically inactive people.
- 6.4.2. As outlined within the pre-application advice, the Economic Development Officer advised they were pleased to see investment in industrial units, given Arun's existing aging supply. In addition to this, the proposed development will provide sustainable growth within Wick and will provide substantial opportunity for employment and raising skills within Arun, across both the East and West Site in accordance with Policy EMP SP1 and SKILLS SP1.

East Site (Phase 1)

- 6.4.3. The proposed development at the East Site (Phase 1) will result in the following quantifiable economic benefits through the provision of Aldi, McDonalds and Costa:
- Average of 74 additional full time equivalent (FTE) construction jobs over the 32-week construction period for Phase 1 ;
 - Approximately £3.2 million in the form of construction-phase Gross Value Added (GVA) over the 32-week construction period, which measures the economic value of the activity directly enabled by the development;
 - Approximately 110 gross additional full time equivalent (FTE) jobs when operational, equating to 60 net additional full time equivalent (FTE) jobs directly onsite , with the range based on the range of floorspace proposed, and the different types of potential occupier/activity which may be more or less labour intensive;
 - A permanent uplift of between £4.0 million per year in Gross Value Added (GVA) , which measures the economic value of the activity directly enabled by the development;
 - A business rate revenue of between approximately c.£310,000 annually, a proportion of which may be retained by the Arun District Council to fund local priorities;
 - Approximately £189,000 in the form of net additional employee spending within the local area; and
 - Between £891,000 and £1,560,000 in the form of net additional wages per year

West Site (Phase 2)

- 6.4.4. The proposed development at the West Site (Phase 2) would result in the following quantifiable economic benefits through the provision of Trade Counters, Light Industrial and Light Industrial / Storage area:

- Between 108 and 148 gross additional full time equivalent (FTE) operational jobs, equating to between 63 and 86 net additional full time equivalent (FTE) jobs directly onsite, with the range based on the range of floorspace proposed, and the different types of potential occupier/activity which may be more or less labour intensive.
- A permanent uplift of £5.1 and £6.9 million per year in Gross Value Added (GVA), which measures the economic value of the activity directly enabled by the development;
- A business rate revenue of between approximately c.£344,000 annually, a proportion of which may be retained by the Arun District Council to fund local priorities;
- Between £197,000 and £270,000 in the form of net additional employee spending within the local area; and
- Between £2.1 and £3.3 million in the form of net additional wages per year.

6.4.5. In summary, both the East and West Site provide substantial economic benefits when considered individually, and would provide a total of approx. 200-250 FTE jobs when considered together.

6.4.6. The application is supported by a Economic Development Statement. Please refer to this supporting report for further details.

6.5. Design, Form and Appearance

6.5.1. ALP Policies D SP1 & D DM1 generally require developments to reflect the characteristics of the wider locality, particularly concerning layout, landscaping, density, mix, scale, massing, character, materials, finish, and architectural details. LNDP policy 22 encourages all planning applications submitted for major development proposals to be considered by a Littlehampton Design Assessment Panel as part of the pre-application consultations.

6.5.2. The Arun Design Guide is predominantly focused on residential development but generally requires development to respond to the distinctiveness & characteristics of their surroundings in terms of scale, massing, and materials. Section J refers to building design and states new development must ensure the existing character and sense of place of an area is respected and enhanced. This can allow for new design forms but only where these take cues from well-designed elements of the area.

6.5.3. Section T of the Arun Design Guide covers mixed & town centre uses and states:

Ground floor frontages should incorporate active uses with inactive uses located above or to the rear. The maximum length of inactive frontage should not exceed 15 metres; and

The height of buildings should be appropriate to context and may include taller 'landmark' buildings which provide a focal point and aid legibility.

6.5.4. The supporting Design and Access Statement outlines how the proposed layout of both the East and West site has evolved through the course of design, responding to the constraints and opportunities of the site. The discussion is split into the East and West Sites below:

East Site (Phase 1)

6.5.5. The architectural approach that has been adopted for the East Site consists of high-quality commercial retail units, for Aldi, McDonalds and Costa. The proposed building designs and materials are indicated on the accompanying planning drawings and are the outcome of close working with Aldi, McDonald's and Costa design teams.

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- 6.5.6. The overall scale and massing of the proposed Aldi Store will be a reduction when considered against the existing industrial unit at the East Site. The Aldi Store will measure approximately 6m in height, down to 4m in height, with a mono-pitched roof line. The building will feature a range of high quality cladding materials including metal, glazing, brick and timber, with metal mono-pitched roofs.
- 6.5.7. The retail floor area will comprise an active frontage along the southern and half of the eastern façade, in line with Section T of the Design Guide.
- 6.5.8. The building elevations, fenestration, entrances and delivery bays have been designed to be site specific and respond positively to the internal site layout and wider contextual connections and views.
- 6.5.9. A similar approach has been taken with the Costa and McDonalds units, which will measure 5.5m and 4.7m in height respectively. These will also be designed to feature a range of high quality cladding materials including metal, glazing, brick and timber, with metal mono-pitched roofs.
- 6.5.10. The commercial nature of the site will respond to the surrounding context the east of New Courtwick Lane, and therefore will not appear out of place with the surrounding character.
- 6.5.11. The existing East Site, is well screened with woodland to the western and northern boundaries. Additional landscape planting is proposed to further screen the site. The proposed units would sit low within the site, and would not appear out of place when viewed from surrounding roads due to this visual screening. It is considered that the proposed commercial units make efficient use of the site while not having an adverse impact on its surroundings.
- 6.5.12. Branding signage is proposed across all three commercial buildings (Aldi, McDonalds and Costa) and advertisement consent will be submitted at a later date to address this. In addition, a signage totum is proposed at the southeast corner of the site to direct users to the site.
- 6.5.13. The proposed layout and design of the East Site has sought to reflect the characteristics of the wider locality, particularly concerning layout, landscaping, density, scale, massing, and character. As such the proposed development is fully in accordance with Arun Policy D SP1 & D DM1.
- 6.5.14. Please refer to the Design and Access Statement for further information.

West Site (Phase 2)

- 6.5.15. Although indicative at this stage, the architectural approach that has been adopted for the West Site consists of high-quality industrial blocks, that are reduced in scale from the existing industrial unit located on the East Site, and orientated towards an inward loop to minimise amenity impacts to the surrounding area.
- 6.5.16. The most western unit is orientated eastwards to ensure that frontages face eastwards, limiting noise and vehicle movements along the western boundary.
- 6.5.17. The overall scale and massing of the proposed industrial units is designed in line with the site's context and surroundings. The height of the proposal is anticipated to be similar to the existing residential character to the west to be the equivalent of a two storey dwelling and in line with the existing industrial area to the east of New Courtwick Lane.
- 6.5.18. The careful approach to depth, height and width would therefore result in industrial units which would not translate to an imposing structure but would result in a units consisting of a visual mass commensurate to the existing area. The units would feature a pitched roof and comprise predominantly metal cladding, partially glazed frontages and associates signage.

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- 6.5.19. The existing west site, is well screened with woodland to the southwest and north east corners and existing trees running along all the boundaries. Additional landscape planting is proposed to further screen the site. The proposed units would sit low within the site, and would not appear out of place when viewed from surrounding roads due to this visual screening. It is considered that the proposed industrial units make efficient use of the site while not having an adverse impact on its surroundings.
- 6.5.20. Overall, the proposed industrial units have been a thoroughly considered and well-designed at this Outline Application stage, providing an opportunity to accommodate a high quality light industrial and trade counter use that would positively contribute to the local area and make use of this vacant site.
- 6.5.21. The proposed layout and design of the West Site has sought to reflect the characteristics of the wider locality, particularly concerning layout, landscaping, density, scale, massing, and character. As such the proposed development is fully in accordance with Arun Policy D SP1 & D DM1.
- 6.5.22. Please refer to the Design and Access Statement for further information.

6.6. Transport, Highways, and Parking

- 6.6.1. ALP policy T SP1 seeks to ensure development provides safe access on to the highway network; contributes to highway improvements (where appropriate) and promotes sustainable transport. Schemes should accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, be accessed by high quality public transport facilities, create safe and secure layouts for traffic, cyclists and pedestrians and provide appropriate levels of parking.
- 6.6.2. Detailed liaison with West Sussex Highways Authority has taken place prior to the submission of this application to agree the approach and methodology with regards to vehicle access to the site, traffic generation and highways improvements. A Transport Assessment has been submitted in support of the application which summarises this liaison and agreement with WSCC Highways team.
- 6.6.3. The report summarises that vehicular access to the site is suitable for the expected use and has been subject to a Stage 1 RSA. Suitable levels of car and cycle parking have been provided and broadly accord with local standards.
- 6.6.4. Trips associated with the existing uses on the site and the proposed development have been sourced from the TRICS database, with the trip type split for each element of the development (Drive-thrus, retail store and warehouse uses) based on data and advice from prospective occupiers.
- 6.6.5. The results of the traffic assessment have been utilised within junction capacity modelling, including sensitivity testing of additional junctions as requested by the LHA. The modelling indicates that the effect of the proposed development is negligible at all junctions.
- 6.6.6. The report concludes that the effect of the proposed development does not meet the 'Severe' test per the NPPF. As such, the proposed development is considered acceptable in highways terms
- 6.6.7. Furthermore, it is acknowledged that during the Public Exhibition event prior to the submission of this application, traffic generation and increased vehicle movements were an area of concern from the public. The supporting Transport Statement demonstrates that the people's perception of traffic movements in the area is not representative of actual vehicle movement data demonstrated within the report.
- 6.6.8. While rush hour traffic can be busy in the area, the projecting vehicle movements relating to the proposed Aldi, McDonalds and Costa will be generally during off-peak times for examples weekends and evenings. Evidence within the Transport Statement also suggests that these vehicle movements are often shared or linked trips.

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- 6.6.9. As such, the impact of traffic and increase in vehicular movements is considered to be less than significant. Furthermore the proposed development fully accords with the requirements of Policy T SP1.

6.7. Residential Amenity

- 6.7.1. Policy D DM1 of the Arun Local Plan requires there be minimal impact to users and occupiers of nearby property and land, while Policy QE SP1 requires development to contribute positively to the quality of the environment and ensure development does not have a significantly negative impact on residential amenity.

East Site (Phase 1)

- 6.7.2. The proposed development at the East Site has been carefully designed to ensure that there are minimal impacts to existing residents within the area.
- 6.7.3. The neighbours immediately adjacent to the site at Millfield Court have been considered within the design, and an acoustic fence is proposed along the northern edge of the built form and hardstanding to limit the impact of noise and vehicle movements. Immediately north of the acoustic fence, additional planting is proposed, with the retention of existing trees and hedgerows to act as an additional buffer both acoustically and visually, screening the site from development.
- 6.7.4. The proposed Aldi Store has orientated the external plant space to the west of the building, to limit the noise impact. Furthermore, as established within Section 6.5 of this report, the building heights have responded to the scale of the surrounding area therefore will not result in loss of light or overlooking.
- 6.7.5. The proposed drive-thru units are located further south away from any existing residential areas, limiting the impact on residential amenity. The future operators will oversee their facilities effectively to ensure that any anti-social behaviour or issues regarding litter are appropriately managed.
- 6.7.6. In addition, it is acknowledged that the existing site comprises an industrial use, which would have generated noise and vehicle movements to the area. It is anticipated that the proposed use will not result in a detrimental impact to surrounding residents given the former use of the site. Furthermore, within the pre-application advice received by Arun District Council, the Officers raised no concern with regards to residential amenity.
- 6.7.7. In this regard, the proposed development at the East Site fully accords with the requirements of Policy D DM1 and QE SP1.

West Site (Phase 2)

- 6.7.8. The proposed development at the West Site has been carefully designed to ensure that there are minimal impacts to existing residents within the area.
- 6.7.9. While indicative at this stage, the proposed locations of units has been carefully considered to not impact residential development to the north and west of the site, with a 15m buffer proposed between the rear gardens of properties along Ernest Fitches Way and the rear of the westernmost units. Additional landscaping is proposed between this buffer to further screen the development.
- 6.7.10. It is acknowledged that within the pre-app response, officers commented that:

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Based on the distances to nearby dwellings shown in the present layout drawing, we have no concerns regarding loss of light or overlooking. Existing landscaping will mitigate harmful impacts. It is noted you suggest no openings on the western elevation of the industrial buildings that back onto the area of dwellings. This and the presence of the buildings themselves may mitigate noise from in the site.

- 6.7.11. The detailed design of the units at Reserved Matters stage will include acoustically sensitive design and a detailed planting plan.
- 6.7.12. In this regard, the proposed development at the East Site fully accords with the requirements of Policy D DM1 and QE SP1.

6.8. Landscape

- 6.8.1. ALP policies D SP1 and D DM1 require development to make the best possible use of land by reflecting or improving on the character of the site/surrounding area. Policy LAN DM1 states development should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas.
- 6.8.2. The proposed development is supported by a Landscape Masterplan, which details the proposed landscape across both Phases 1 and 2. The detailed design has been established within the East Site (Phase 1), with further landscaping to the West Site to be considered in greater detail within a Reserved Matter application for the West Site (Phase 2).
- 6.8.3. Tree and landscape buffers along the site boundaries and between the East and West sites are to be retained and enhanced, which will visually separate the East and West and provide visual screening of the development from the surrounding area.

East Site (Phase 1)

- 6.8.4. The proposed landscape design to the East Site comprises the retention of boundary trees and hedgerows, with an enhanced Ecology Corridor to the rear of Aldi, along the boundary with Phase 2.
- 6.8.5. Tree lines streets are proposed along New Courtwick Lane, with additional tree planting within the proposed carparking. In addition small areas of grass and hedging are proposed to provide visual interest and reduce the appearance of tarmac parking areas.

West Site (Phase 2)

- 6.8.6. Two woodland parcels are being retained within the northeast and southwest corners of the site, with enhanced landscaping along all boundaries to visually screen the development.
- 6.8.7. Hedging and tree planting is proposed within the carparking area to provide visual interest and reduce the appearance of an overly tarmacked site.
- 6.8.8. In accordance with Policy LAN DM1, the proposed development respects the particular characteristics and natural features of the landscape character of the area by maintaining the woodland parcels, and boundary planting and reducing the landscape visual impact of the development. This is clearly established across both the East (Phase 1) and West (Phase 2) proposals.
- 6.8.9. Please refer to the supporting Landscape Masterplan for more information.

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6.9. Arboriculture

- 6.9.1. Policy ENV DM4 of the Arun Local Plan states TPO protected trees, Ancient Woodland, those in a Conservation Area or trees that contribute to local amenity are not damaged or felled unless the development meets the certain criteria including that the benefits outweigh the loss of trees or woodland.
- 6.9.2. There are a total of 114 trees and hedgerows across both phases of the site. There are no ancient or veteran trees on site or within the vicinity of the site. There are two parcels of woodland one to the northeast of the West Site and one to the southeast of the West Site. Both parcels are being retained and enhanced, with all boundary trees on site to be retained to provide screening from the development.
- 6.9.3. An Arboricultural Impact Assessment has been prepared in support of the application and details the two phases of development with regards to impact on trees.

East Site (Phase 1)

- 6.9.4. The majority of trees and hedgerows on the East Site are to be retained, with the exception of four C Grade trees (T62, T63, T46, T65), located on the proposed area of hardstanding for McDonalds. In addition a poplar tree (T31) is proposed to be removed along the East Site/West Site boundary to facilitate future access for Phase 2.
- 6.9.5. All existing trees along the northern boundary and the hedgerows bounding Millfield Court will be retained to provide a visual and acoustic buffer from the development.
- 6.9.6. It is acknowledged that parking is proposed within the Root Protection Area of an off-site protected sycamore tree (T66), however there is existing hardstanding within the RPA of this tree. the proposed parking layout would mean that the incursion of surfacing into the RPA of sycamore T66 would decrease from approximately 16% of the area (57.5m²) to approximately 14% (50m²). This would therefore be an improvement on the existing position.
- 6.9.7. The proposed parking space surface can be porous, such as block paving or resin-bound aggregate, so that there would be an overall enhancement in soil rooting conditions to the existing. The concrete slab and other surfacing can be carefully removed, working backwards from the existing surface, to ensure that the underlying soil structure is not further compacted.
- 6.9.8. Further to the above the proposed parking provision also reduces the existing incursion of hard surfacing within the RPAs of sycamore T70 and ash T71.
- 6.9.9. In line with the pre-app advice received from the Arun Tree Officer, the application is supported by a Preliminary Arboricultural Method Statement and a Tree Protection Plan. The finalised detail of both these reports will be dealt with via planning condition.
- 6.9.10. As such, the proposed development at the East Site fully accords with the requirements of Policy D SP1, D DM1 and Land DM1 of the Local Plan.

West Site (Phase 2)

- 6.9.11. The proposed development on the West Site would result in the removal of 33 individual trees and 14 groups of trees.

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- 6.9.12. Of the proposed West Site trees to be removed, 58% are young to semi-mature natural regeneration, and 73% are of species goat willow, hawthorn, silver birch, sycamore and blackthorn. Of the 14 groups of trees, 36% are young to semi-mature trees and 64% are clearly natural regeneration within the site. Therefore, the majority of proposed removals are of species and ages of trees which are readily replaced with new tree and woodland planting.
- 6.9.13. The minor incursions of new hard surfacing and ground level changes in the outline Phase 2 area layout would have a negligible impact on the health and longevity of the remaining trees. Once detailed proposed levels are known, careful tree root pruning could be carried out on the affected trees to ensure that their root systems can regenerate in their new surroundings.
- 6.9.14. As such, the proposed development at the West Site fully accords with the requirements of Policy D SP1, D DM1 and Land DM1 of the Local Plan.
- 6.9.15. Please refer to the supporting Arboricultural Impact Assessment for further information.

6.10. Ecology and Biodiversity

- 6.10.1. Policy ENV DM5 of the Arun Local Plan states development schemes shall seek to achieve a net gain in biodiversity and protect habitats on site.
- 6.10.2. The application is supported by a detailed Ecological Impact Assessment (EclA), which has surveyed both the East and West Site for ecological value and habitats. The EclA concludes that subject to the implementation of mitigation measures, the proposed development across both the East and West Site will not result in significant negative effects to on-site ecology.
- 6.10.3. It is acknowledged that reptiles have been recorded on the West Site, therefore the application is supported by a Reptile Mitigation Strategy.
- 6.10.4. The application is also supported by a BNG Assessment. The Assessment outlines that by virtue of the proposed development on-site (across both the East and West Site), there will be a net loss in biodiversity of -53.57%. However, given the hybrid nature of the application, BNG must be accounted for individually across the East Site (Phase 1) and West Site (Phase 2). Assessing BNG across two phases has been agreed with planning officer's prior to planning submission.
- 6.10.5. When assessed individually, Phase 1 is predicted a 86.59% biodiversity net gain, and Phase 2 is predicted a -61.47% biodiversity loss. Therefore, BNG will be achieved through on and off-site measures for the West Site (Phase 2), which will be established at the Reserved Matters phase.
- 6.10.6. On-site significant biodiversity gain would be secured through an appropriate legal mechanism (as such planning condition) subject to an on-site HMMP for a 30-year period.
- 6.10.7. Off-site Biodiversity Units would be secured through registration under the Biodiversity Gain Register, and subject to a separate off-site HMMP.
- 6.10.8. In summary, the proposed development will achieve an overall net gain in biodiversity across the two phases, and will protect habitats on site in accordance with Policy ENV DM5 of the Arun Local Plan. Please refer to the supporting Ecology Reports for further information.

6.1. Noise Assessment

- 6.1.1. Policy QE DM1 states residential development likely to experience road noise must (a) be supported by a noise exposure category assessment and designed to ensure that residents will not be adversely affected by noise; and (b) consider both the likely level of exposure at the time of application and any increase that might be reasonably expected in the foreseeable future.

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- 6.1.2. The hybrid application is supported by an Acoustic Report which assesses the impacts of noise produced by the proposed development on local receptors.

East Site (Phase 1)

- 6.1.3. The Acoustic report summarises the closest sensitive noise receptors include Millfield Court to the Northeast of the site and residential properties along Courtwick Lane to the north of the site. The report outlines the proposed traffic noise generated by the car parks and 'drive-thru' associated will have a negligible impact on these sensitive receptors.
- 6.1.4. With regards to servicing of these facilities, for example delivery operations for the at the food store, this will result in a low impact at the closest identified noise sensitive receptors, when assessed in accordance with BS 4142. In order to mitigate against this impact, a 3m acoustic fence is proposed along the northern end of the site, with substantial buffer planting north of this fence to provide further noise mitigation.
- 6.1.5. The report concludes the proposed noise levels produced by the Phase 1 development will be acceptable within the local area.

West Site (Phase 2)

- 6.1.6. The Acoustic report summarises the closest sensitive noise receptors to the West Site include residential properties along Ernest Fitches Way. The report outlines the proposed traffic noise generated by the car parks and light industrial use will have a negligible impact on these sensitive receptors.
- 6.1.7. For the Reserved Matters application fixed mechanical plant should be designed to achieve cumulative rating sound levels of 43 dB LAr,Tr and 33 dB LAr,Tr at the nearest sensitive receptors to the west on Ernest Fitches Way during the day and night, respectively.
- 6.1.8. The delivery operations within the proposals for the outline application will result in a low impact at the closest identified noise sensitive receptors when assessed in accordance with BS 4142.
- 6.1.9. The report concludes the proposed noise levels produced by the Phase 2 development will be acceptable within the local area, subject to further detailed design at the Reserved Matters Stage.
- 6.1.10. Please refer to the supporting Acoustic Report for further information.

6.2. Air Quality

- 6.2.1. The proposed development has the potential to cause air quality impacts at sensitive locations during the construction and operation phases, as well as expose future occupants to elevated pollution levels. As such, an Air Quality Assessment has been produced to determine baseline conditions at the site, consider its suitability for the proposed end-use and assess potential effects associated with the scheme.
- 6.2.2. The Air Quality Assessment outlines that with regards to Construction, subject to the implementation of mitigation measures, the residual impacts from dust generating activities are predicted to be not significant, in accordance with the IAQM guidance.
- 6.2.3. The Report also outlines that impacts from operation phase, including road traffic emissions are considered not significant, and future residents at the development site are considered unlikely to be exposed to pollution concentrations above AQOs.
- 6.2.4. Please refer to the supporting Air Quality Assessment for further details.

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6.3. Sustainability

- 6.3.1. Arun Local Plan Policy ECC SP1 outlines that development in the District must also be designed to mitigate against the impacts of climate change by reducing the emissions of greenhouse gas in line with the Energy Hierarchy. The Council will support proposals which contribute to both mitigating and adapting to climate change and to meeting the national targets to reduce carbon emissions
- 6.3.2. Policy ECC SP2 outlines that all commercial development will be expected to be energy efficient, using design and layout to promote energy efficiency; and incorporating renewable and low carbon energy supply systems. All major developments must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site.
- 6.3.3. The proposed development on the East Site will utilise envelope U-values adhering to Building Regulations, low air permeability, low LED lighting with controls, and mechanical ventilation with passive heat recovery. In addition Air Source Heat Pumps (ASHP) and solar PV panels are proposed of the roofs of the Aldi, McDonalds and Costa to utilise renewable energy. The proposed development will be built to Building Regs Part L achieving a 10% reduction in carbon emissions in line with Policy ECC SP1.
- 6.3.4. The proposed development on the West Site, while only at Outline development at this stage will utilise envelope U-values adhering to Building Regulations, low air permeability, low LED lighting with controls, and mechanical ventilation with passive heat recovery. In addition Air Source Heat Pumps (ASHP) and solar PV panels are proposed of the roofs of the warehouses to utilise renewable energy. The proposed development will be built to Building Regs Part L achieving a 10% reduction in carbon emissions in line with Policy ECC SP1.
- 6.3.5. Therefore the proposed development will be fully compliant with regards to sustainability. Please refer to the supporting Energy Statements for the East (Phase 1) and West (Phase 2) sites for further information.

6.4. Flood Risk and Drainage

- 6.4.1. Policy W DM2 of the Arun District Council refers to the sequential and exceptions tests, need for a Flood Risk Assessment (FRA) and mitigation. Policy ECC SP1 states development must be located & appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding. Government guidance requires the submission of a sequential site assessment is required where a site is at substantial risk of current or future flooding.
- 6.4.2. The proposed redevelopment of the East and West Sites is deemed appropriate for Flood Zone 1 according to the principles set out in the NPPF. The site is considered to be at low or very low risk of flooding from all sources.
- 6.4.3. Information from the EA's online mapping data shows that the area of Littlehampton containing the site is not located within a groundwater Source Protection Zone (SPZ).
- 6.4.4. A CCTV Drainage Survey has found that all existing foul water is connected to the public sewer to the north-east of the site in New Courtwick Lane. Southern Water sewer records also indicate public foul water sewers nearby to the north-west. It is proposed to discharge the full foul from the East Site into the existing public sewer to the east and discharge part of the West Site into the eastern public sewer and part to the north-west public sewer network. Pre-development capacity enquiries and sewer connection will be required to be made in due course once the detailed drainage design is developed.

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- 6.4.5. A surface and foul water drainage plan has been produced for the development within the supporting Flood Risk Assessment and Drainage Strategy. This demonstrates that surface water runoff will be collected with downpipes, gulleys, permeable paving and channel drains. This will discharge via treatment systems where necessary, into a series of crate soakaways for infiltration into the ground.
- 6.4.6. Using infiltration SuDS methods, as proposed, meets with the preferred hierarchy of surface water disposal as laid out in the SuDS Manual and Building Regulations Part H.
- 6.4.7. As dictated by current guidance, the soakaway and permeable paving systems have been designed to accommodate surface water generated from storm with a 100-year return period, with an additional 45% increase in rainfall intensity due to climate change.
- 6.4.8. Residual risk is limited to flood events or infrastructure failure causing overland flows to be established from sewer surcharging and potential overland flows of sufficient magnitude to inundate the site.
- 6.4.9. In summary the proposed development can be successfully implemented and managed and that there should be no increase in risk to users and neighbouring properties from flooding over the expected design life of the development. This accords with the Local and National Planning Policy. Please refer to the supporting FRA and Drainage Strategy for further information.

6.5. Land Contamination

- 6.5.1. ALP Policy QE DM4 states development will be permitted on land that is contaminated as long as remediation is provided.
- 6.5.2. On this basis a Ground Contamination Risk Assessment has been prepared in support of this application.
- 6.5.3. The submitted report details that an intrusive ground investigation is recommended to allow a quantitative risk assessment of the potential contamination sources that have been identified to be made. This intrusive ground investigation report will be secured via a suitably worded planning condition.

6.6. Archaeology

- 6.6.1. Policy HER DM6 of the Arun Local Plan states where a site on which development is proposed has the potential to include heritage assets with archaeological interest, permission will only be granted where it can be demonstrated development will not be harmful to the archaeological interest of the sites. The policy requires a desk based archaeological assessment be submitted.
- 6.6.2. On the basis, an Archaeological Desk Based Assessment has been submitted which outlines that the proposed development will have no impact upon the significance of any designated archaeological heritage assets in the surrounding area.
- 6.6.3. The groundworks associated with the construction of the proposed development do have the potential to impact on any previously unrecorded archaeological remains which may survive on the site as sub-surface features.

ECE Planning

East Site (Phase 1)

- 6.6.4. The Desk Based Assessment for the East Site concludes that it is unlikely that any archaeological remains will have survived on the eastern part of the site as the groundworks involved in constructing the existing building and associated features would have destroyed or severely truncated any relevant deposits which might have been present. As a result, the potential for archaeological finds and features dating from any period being present on the eastern part of the site is deemed to be negligible.

West Site (Phase 2)

- 6.6.5. The Desk Based Assessment outlines that it is likely that archaeological remains may have survived in the western part of the site, although these will have been truncated by the footings of the various buildings (glasshouses) and any related service runs.
- 6.6.6. A review of the available evidence has confirmed that the western part of the study site has the following potential:
- A low potential to contain finds and features relating to the Saxon, medieval, and postmedieval periods.
 - A high potential to contain finds and features relating to the prehistoric, Roman and modern periods.
- 6.6.7. Impacts upon archaeological deposits can be mitigated for in advance of, or during construction works. It is likely that an archaeological evaluation will be required in respect of the western part of the site.
- 6.6.8. It is expected that any requirement for archaeological fieldwork could be secured by the use of an appropriately worded condition attached to the granting of planning permission. The timing and scope of any archaeological fieldwork will be discussed with the client and the LPA Archaeological Officer in due course. The timetable for any intrusive archaeological investigation will need to take into account the known ecological constraints of the site.

7. Conclusions

- 7.1. This Planning Statement has been produced by ECE Planning on behalf of our clients, NCL Estates Ltd in support of the Hybrid Planning Application for the redevelopment of the site at Land West of New Courtwick Lane, Wick, Littlehampton, BN17 7RZ, to deliver a new retail facility and industrial area across two phases.
- 7.2. The proposals seek to redevelop a vacant, brownfield site within a highly sustainable location north of the A259. The proposed development will deliver an Aldi Food store, Costa and McDonalds drive-thru facilities, and up to 8,800sqm of Light Industrial floorspace, bringing significant socio-economic benefits to the area through this under-utilised site.
- 7.3. The planning submission will be a Hybrid Application, to be delivered across two phases of development:
- Phase 1 (Full Planning) – Redevelopment of the East of the site to deliver a retail facility (hereby referred to as East Site)
 - Phase 2 (Outline Planning) – Redevelopment of the West of the site to deliver a mix of trade counters, light industrial and storage units (hereby referred to as West Site)
- 7.4. The proposed development has been prepared in consultation with the Local Planning Authority and the local community, through pre-application advice and public consultation. Comments received through these consultation processes have helped inform the development.
- 7.5. The proposed layout has been sensitively designed across both phases to not have a detrimental impact on existing residential amenity, ecology or landscape, with an enhanced landscape buffer screening to limit impact on the surrounding area as visual impact.
- 7.6. The application is accompanied by a detailed transport and highways information which concludes that the road, access and layout has been designed to be entirely acceptable with regards to highways standards and requirements. This includes detailed consultation with the Local Highways Authority.
- 7.7. The application is accompanied by detailed drainage and flooding information which ultimately conclude that the proposed development would be entirely acceptable and future residents would be safe from flooding.
- 7.8. All other material considerations have been considered within this Statement and accompanying reports which demonstrate that the proposed development would not result in any significant harm to amenity or environment which cannot otherwise be mitigated by appropriate conditions.
- 7.9. To conclude, the application is compliant with the Arun Local Plan and the NPPF. It is strongly contended that all the relevant issues have been satisfactorily addressed, such that there would not be any demonstrable harm as a result of the development proposed and planning permission should be granted without delay.