

## WEST SUSSEX COUNTY COUNCIL CONSULTATION

<b>TO:</b>	Arun District Council - FAO: Simon Davis
<b>FROM:</b>	WSSC – Highways Authority
<b>DATE:</b>	21 May 2025
<b>LOCATION:</b>	Former Waitrose Site Avon Road Littlehampton BN17 6AT
<b>SUBJECT:</b>	LU/76/25/PL Demolition of vacant supermarket building and erection of four-storey hotel with ancillary restaurant, public realm, landscape improvements, retention of associated car park and all associated works. This application affects the setting of listed buildings and affects the character and appearance of the East Street Conservation Area and is in CIL Zone 4 (Zero Rated) as other development.
<b>RECOMMENDATION:</b>	Modification

West Sussex County Council, in its capacity as Local Highway Authority (LHA), have been consulted on proposals to redevelop site to provide Premier Inn hotel with associated works. The LHA provided pre-application advice in March 2025.

The application is supported by technical documents and drawings include Transport Statement (TS), Travel Plan (TP), Delivery & Servicing Management Plan and outline Construction Environmental Management Plan (CEMP).

### **Site Context & Accessibility**

The former supermarket building will be demolished and new building erected, comprising 130-bedroom hotel. The hardstanding car parking area will be retained to serve the hotel.

Vehicle access is as per existing arrangements from Avon Road. Avon Road is 'D' class public highway at the eastern end, subject to 30mph and one-way traffic (west to east). The western half of Avon Road is privately maintained. The car park entrance is within privately maintained section. There are two car park exits, the central one being half in private road/half in adopted highway.

The main guest/hotel frontage would be from Anchor Springs. There are several amenities, services and public transport options within 10-minute walking distance of the site, including bus stops on Anchor Springs (with regular services to locations such as Brighton, Chichester, Shoreham, Arundel), Train Station and commercial area (food/retail). The nearby footway network is street lit with crossing facilities in key locations, however it is considered that additional improvements should be made as requested at pre-app stage and covered further on in this report.

Cycling could be a feasible option on carriageway with an extensive area within 5km catchment. NCN Route 2 is west of site and connects Littlehampton with Bognor (sections off carriageway/shared use paths).

### **Travel Plan (TP)**

Monitoring fee of £3,950 required, to be secured by legal agreement. The Travel Plan auditing fees reflect the amount of local authority officer time required to evaluate the initial plan, assess the monitoring data and participate in on-going review and agreement to any amended plans in the future, including post planning once the development is built out and occupied. The costs have been benchmarked against fees charged by other Local Authorities and are considered to proportionate and reflective of the costs incurred.

The TP aims to increase sustainable travel and decrease single occupancy car journeys for both staff and guests during 5-year life – via several measures, outlined below:

- Public transport info displays in reception
- EV parking and passive provision

- Car sharing promoted as part of staff travel info pack
- Cycle parking
- Cycle facilities (changing/shower/lockers and maintenance equipment kept on reception).
- Car sharing info given
- Journey planning etc
- Car park management
- Travel events promoted such as walk /bike to work week
- TP noticeboard
- Staff welcome packs
- TP co-ordinator to negotiate with bus operators for travel vouchers and local cycle shops discounts
- TP to be monitored in accordance with TRICs SAM – three multi modal surveys over five year period
- 30 employees – travel to work data = 59% commute by car. *Feasible to assume circa two-thirds of staff (i.e. 20) would be on-site at any one time. This would account to 40 two-way trips by staff via all modes of transport, and considering the mode share forecast of 59% single-occupancy car journeys as above, this would equate to 24 two-way staff trips by car per day.*
- *Taking the 24 two-way trips away from the total vehicle trips for staff and guests (277), there may therefore be in the order of 253 two-way trips by guests across the course of a typical weekday.*
- 15% target reduction in staff trips has been set out in fig 16 also showing target reduction for guest trips, which make majority of trips (total reduction target 38 trips for guests and 4 staff trips over TP life).
- If 15% trip rate reduction target not met, then further TP measures will be implemented – these will depend on what is required as shown by surveys and staff feedback.

### **Access**

The LHA has reviewed data supplied to WSCC by Sussex Police over a period of the last five years. There has been a recorded injury incident at the junction of East Street/Anchor Springs. However, from an inspection of accident data it is clear that this was not due to any defect with the junction/ road layout.

No changes proposed to the existing access and egress points to the car park, from Avon Road. These feature continuous footway across giving pedestrians priority. How will the entrance/exit points be made clear? It is acknowledged there is some arrow directions on-road markings within the car park but some signage and improved directional markings may be of benefit to minimise confusion of entry/exit points.

The existing zebra crossing/pedestrian crossing of Avon Road from car park to site will be retained, with increased public realm space improving pedestrian access routes around building and to frontage on Anchor Springs.

### **Delivering/ Servicing**

Delivery & Servicing Management Plan (DSMP) sets out proposed arrangements for refuse, servicing and deliveries. 14 deliveries per week (7x linen, 3x food, 1x beverage and 3x refuse / recycling). This equates to approximately two deliveries per day. This servicing typically takes place during the daytime, ensuring the highway peak hours are avoided.

An inset loading bay is proposed to accommodate these movements. Small articulated vehicles, rigid lorry and refuse lorry – swept path tracking shows these can manoeuvre the bay. Previous pre-app comments regards requirement for Traffic Regulation Order (TRO) for the bay still apply:

TRO and Parking Team have commented as follows:

*It remains the view of TRO/Parking Teams that the arrangement proposed is totally unacceptable unless a TRO amendment is made.*

*There is currently a double yellow line along the whole south side of Avon Road. If the developer installs a loading bay, the yellow line restriction will automatically apply to the bay itself, creating an*

*unacceptable conflict in restriction if they try to create a privately enforceable loading bay there. If a privately enforceable bay was acceptable (which it isn't) a TRO amendment would still be needed to remove the restriction across the bay anyway. If that's being done the developer may as well just amend the TRO to create a proper loading bay at the same time, avoiding the problems below...*

*Several areas around the county with similar arrangements (often at railway stations) cause a lot of confusion to the public. In some cases we have had arguments and legal issues recurring at such sites for 10 years or more which are a drain on resources that we really should avoid. As a general rule any parking restriction on a layby directly abutting the public highway, as in this case, must be supported by a TRO, otherwise it looks as if WSCC is permitting private parking enforcement on a public road, which is essentially unlawful.*

*The options for the developer at this site should be to either have a TRO on the bay, or to leave the restriction as it is now and move the loading bay to within their private car park. The layout they are proposing is not acceptable to WSCC from a TRO perspective.*

*Signage will not resolve the issue considering public highway is adjacent, leading to potential confusion and issue with misuse of layby.*

### **Pedestrian Infrastructure Improvements**

The applicant was requested to provide improvements to the local pedestrian infrastructure at pre-app stage:

- New dropped kerb and tactile at Anchor Springs/East Street
- Tactile paving to existing dropped kerb at Avon Road/East Street
- Tactile paving to existing dropped kerb at Avon Road/Duke Street.

The TS argues that there is likely to be a reduction in pedestrian trips to and from the site because of the change in use from supermarket to hotel, and state that the public realm improvements (building set back and increase public space) is sufficient in terms of mitigation. The LHA consider that the development will still have an impact in terms of pedestrian movement to and from the site, particularly on the desire line from Anchor Springs frontage of hotel to the High Street/town centre. National Planning Policy Framework (NPPF) para. 115 still applies as there will be pedestrian movement and this requires that *safe and suitable access to the site can be achieved for all users*. Mobility impaired (wheelchair/partially sighted etc) guests of the hotel would directly benefit from improvements to the nearby footway crossing facilities. The existing full height kerb at Anchor Springs/East Street junction is a physical barrier to this onward travel toward the town centre for such guests as wheelchair users etc. Dropped kerb/tactile paving at this location would facilitate safe and suitable access and connection from the site to local amenities. Considering location of the hotel and touristic nature of Littlehampton it is likely that such movements would be in place during guest stays.

This would also accord with Arun Local Plan policy T SP1 whereby development must meet certain criteria, including *contribute to highway improvements and promotes sustainable transport...cycle, pedestrian and bridleway network... consider the needs of people with disabilities by all modes of transport*.

Furthermore, the LHA does consider that this request meets tests set out in para. 58 of NPPF in that it is necessary, directly related to the development and fairly and reasonably related in scale and kind to the development (with these minor improvements of minimal cost). Providing these improvements would make the development policy compliant (NPPF and Arun Local Plan).

### **Construction Environmental Management Plan (CEMP)**

An outline CEMP has been provided. This is to be updated, details of which could be secured by condition.

- Anticipated types of vehicles set out but number and frequency would be required.
- Indicative site set up shows hoarding, storage areas in car park, loading and unloading to be via newly created layby – contractor parking – limited within site?
- Would need swept path tracking of large vehicles through Avon Road and into site. Wider routing shows through Lyminster – makes more sense to use new Lyminster bypass to avoid village etc.
- May need licenses for temporary traffic management measures (such as road closures etc).

### **Trip Generation**

Baseline trip generation data was agreed under LU/3/19 for 83 x dwellings on the site – this included agreed trip rates for the baseline supermarket trips data. For the historic food store use this was 68 vehicle trips in AM and 118 in PM peak hours.

For the proposed trip generation, data from existing Premier Inn sites has been used and applied to bedroom number proposed – 31 vehicle trips in AM and 26 in PM peak hours. Thus, a reduction in 37 vehicle trips in the traditional AM peak hour and reduction 92 in PM peak hours could result. On the basis that a significant decrease in vehicle trips in the peak hours is anticipated, the LHA would not require further junction capacity assessment and does not anticipate a 'severe' impact to the operational capacity of the nearby road network.

### **Car Parking**

Arun SPD advises that for a hotel use, proposals will be assessed on a case-by-case basis. In comparison, WSCC Guidance advises 1 vehicle space per bedroom with disabled parking at 5% of total parking spaces and 1 cycle space per 8-car parking spaces.

The existing car park features 96 x spaces of which 8 x spaces will be for accessible/disabled use (minor works will be required to convert existing child spaces to disabled). 6 x bays are also proposed to be equipped with Electric Vehicle charging.

Whilst applying the WSCC guidance would require 130 car spaces, the LHA are mindful that Arun SPD is the adopted guidance and that within this the accessible location of the site is taken into account and thus raises no concern with the level of car parking proposed. The Travel Plan will also seek to encourage uptake of sustainable/active travel modes for staff/guests and the proximity to public transport means some trips are likely to be via modes other than the private car.

Furthermore, a parking accumulation assessment has been undertaken, assuming occupation of all 130 bedrooms, found a maximum demand for approx. 100 spaces overnight if full occupancy. Balanced against the accessible location of site, proximity to public car parks and extensive road protection markings nearby, the LHA do not raise a concern to the level of parking proposed.

Some of the plans do not fully show the existing access aisle hatching for the accessible spaces. It is advised that a plan showing the markings as existing, and showing works proposed to convert what are currently child/parent spaces to disabled/accessible/standard spaces. Also advised that proposals for staff parking are clarified, is there to be an area within the car park that is allocated to staff – will this be signed/managed?

Understood car park will be managed with ANPR cameras and charging schedule, LPA may wish to ask further detail on how this is managed and suitably secure this either via condition or legal agreement.

Internal provision for 14 x cycles proposed, accessed from Avon Road – this meets with WSCC Guidance. It is also noted that guests can store bicycles within bedrooms.

### **CONCLUSION**

Further information/modification is required as summarised:

- Commitment to applying for TRO for the loading bay *or* reconsider servicing arrangements (e.g. from within car park).
- Pedestrian infrastructure improvements.
- Updates to CMP (could be secured by condition).
- All plans to reflect parking layout inc. disabled/accessible hatching and changes made clear and clarify staff parking arrangements.
- Car park access/egress/directional signage

Please ask the applicant for this information and re-consult.

**Katie Kurek**

**West Sussex County Council – Planning Services**

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF

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**From:** Katie Kurek [REDACTED]  
**Sent:** 21 May 2025 11:34  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>  
**Cc:** David Britton [REDACTED]  
**Subject:** Response To Application Number LU/76/25/PL at Former Waitrose Site

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[REDACTED]  
**Katie Kurek (she/her) | BA (Hons) MCIHT**

Senior Transport Planner

County Highways - Planning Services - Highways Transport & Planning

West Sussex County Council

Location: Ground Floor, Northleigh Building, Chichester, PO19 1RH

[REDACTED]

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