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WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

Planning Statement

(including Flooding Sequential Test)

Former Waitrose supermarket, Anchor
Springs, Littlehampton, BN17 6AT

Proposed new hotel development

APRIL 2025

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**APPENDIX I: Arun District Council Pre-application advice letter
dated 17 January 2025**

I INTRODUCTION

- I.1 Walsingham Planning has been instructed by Premier Inn Hotels Ltd to prepare and submit a planning application for the demolition of a vacant supermarket building and erection of a 4-storey, 130-bed hotel with ancillary restaurant, public realm and landscape improvements, retention of the associated car park and all associated works on the site of the former Waitrose supermarket on Anchor Springs and Avon Road, Littlehampton, BN17 6AT (referred to in this Statement as ‘the site’).
- I.2 Arun District Council is the relevant local planning authority (LPA) to which this application is submitted.
- I.3 Whitbread Plc’s Premier Inn brand will operate the hotel which will include an ancillary restaurant, open to both hotel guests and non-hotel guests.
- I.4 The hotel would operate in addition to the existing Roundstone Lane Premier Inn hotel on the edge of Littlehampton.
- I.5 Premier Inn has identified a demand for additional visitor accommodation within the town centre.
- I.6 The new hotel will provide Littlehampton with additional all year-round quality visitor accommodation in a sustainable town centre location and Economic Growth Area.
- I.7 This Statement will describe the site and surroundings and assess the proposals against relevant planning policy and the National Planning Policy Framework (NPPF). The proposals comply with Development Plan policies and the NPPF. A recommendation for approval is therefore appropriate.
- I.8 In addition to this Planning Statement, the application is supported by the following documents:
- Application Form and Certificate B
 - CIL Form
 - Air Quality Assessment
 - Biodiversity Net Gain Report
 - BREEAM Report
 - Construction Environmental Management Plan

- Delivery and Servicing Management Plan
- Design and Access Statement
- Ecological Assessment
- Economic Impact Assessment
- Energy and Sustainability Report
- External Lighting Report
- Flood Risk and Drainage Statement
- Geo-Environmental Report (including Site Investigations and Contamination Assessment)
- Heritage Statement
- Landscape Masterplan
- Landscape Proposals Information
- Noise Impact Assessment
- Odour Report
- Statement of Community Involvement
- Transport Statement
- Travel Plan
- Utility Scan
- Planning Drawings:
 - Location Plan
 - Existing Site Plan
 - Proposed Site Plan
 - Proposed Ground Floor Plan
 - Proposed First Floor Plan
 - Proposed Second Floor Plan
 - Proposed Third Floor Plan
 - Proposed Roof Plan
 - Existing Elevations
 - Proposed Elevations
 - Proposed Streetscape Elevations
 - Proposed CGIs

2 SITE AND SURROUNDINGS

2.1 The application site comprises the vacant, former Waitrose, supermarket building to the south of Avon Road and north of Anchor Springs. The site also includes the vacant circa 90-space supermarket car park to the north of Avon Road and south of Franciscan Way. The supermarket unit has been vacant since 2015 (10 years) following the relocation of Waitrose to Rustington.



Aerial image of the application site (outlined in red)

- 2.2 The site gently slopes upwards from south to north.
- 2.3 This site lies within Littlehampton's Built-Up Area Boundary (BUAB), Littlehampton Town Centre and Economic Growth Area. The west elevation of the supermarket building forms part of Littlehampton's Secondary Retail Frontage.
- 2.4 The main bus stops for Littlehampton Town Centre are situated to the south of the site along Anchor Springs.
- 2.5 The east of the site borders Littlehampton's East Street Conservation Area. Avon House and its boundary wall (to the north of the main building) are Grade II Listed. There are additional

Grade II Listed buildings further north and east, as shown by the blue markers on the map below, as well as locally listed buildings.



Statutorily Listed Buildings Map

2.6 According to the Government's Flood Map for Planning, the southeast section of the site resides within flood zone 3 (high risk from rivers and sea), as shown by the darker blue/purple shading on the map below.



Government Flood Map for Planning with the application site roughly outlined in red



View east along Anchor Springs of the supermarket's south elevation



View west from East Street along Anchor Springs and of the supermarket's east and south elevations



View west from East Street along Avon Road and of the supermarket's east and north elevations



View south from the car park of the supermarket's north elevation



View north from Avon Road of the site's car park

- 2.7 To the east of the site, beyond East Street, is a terrace of two-storey residential dwellings and commercial uses. To the south of the site, beyond Anchor Springs, is Anchor Springs public car park. To the west of the site, beyond a pedestrian 'cut-through', is a utilities building and light industrial unit. To the north (beyond Franciscan Way) and northeast of the site are residential dwellings.
- 2.8 Both the supporting Design and Access Statement and Heritage Statement provide an in-depth analysis of the of the existing site and its surroundings.

Planning History

2.9 The site's most relevant planning history is as follows:

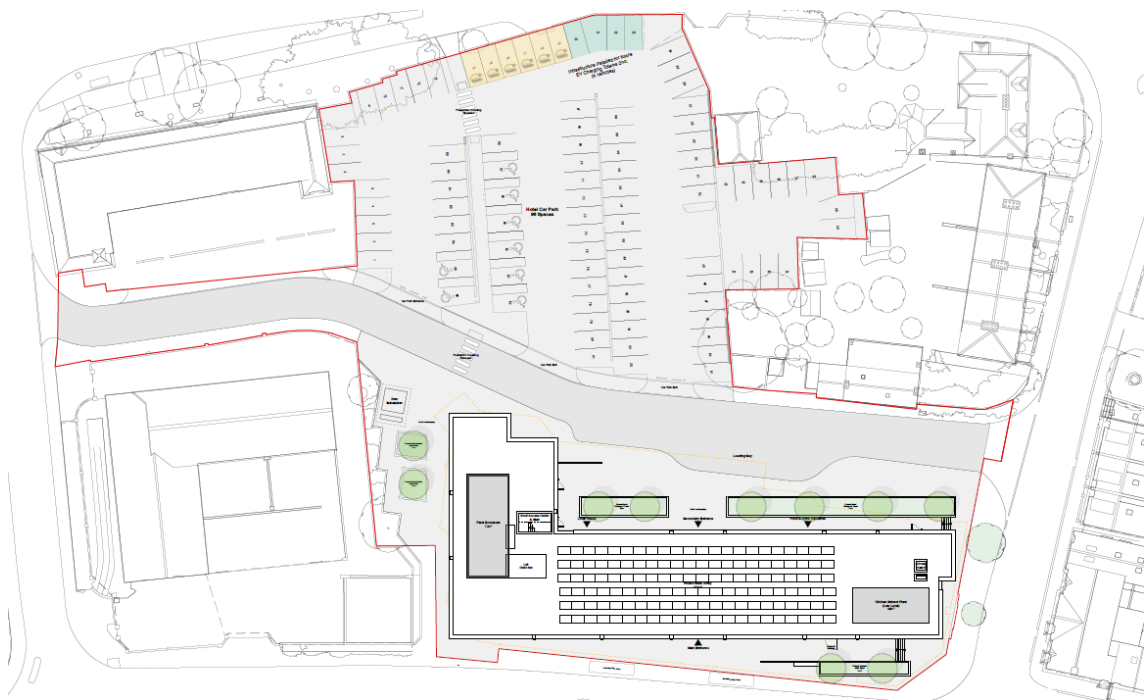
- LU/3/19/PL - Demolition of existing buildings & redevelopment of site comprising 83 No. residential units (C3 Dwelling Houses) & 158.5 sqm flexible retail floorspace GIA (A1 (Shops) and/or A2 (Financial & Professional Services) and/or A3 (Food & Drink) and/or D1 (Non-residential Institutions)) together with the provision of car & cycle parking, landscaping & associated works. – Decision Date: 14-08-19 - Refused and appeal dismissed on the following grounds:
 1. Unacceptable design, excessive site coverage, height, bulk, and unacceptable relationship with neighbouring properties the proposal represents an over development of the site which is not in keeping with the character and appearance of the area.
 2. Scale, height and use of materials fails to adequately respect the setting of adjacent heritage assets.
 3. Fails to make an adequate contribution towards affordable housing provision and other infrastructure requirements.
 4. Loss of a large retail unit and its replacement with a much reduced retail footprint which not result in the provision of additional or enhanced commercial, leisure activities, hotels or restaurants or additional retail use.
 5. Layout and proximity of the development to a public right of way.
- LU/214/20/PL - 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). Decision Date: 01-03-21 – Status: Conditional approval with S106 (not implemented).

3 THE PROPOSED DEVELOPMENT

3.1 This planning application is for:

“Demolition of vacant supermarket building; erection of four-storey hotel and restaurant building; public realm and landscape improvements; retention of associated car park and all associated works.”

3.2 The demolition of the vacant supermarket building will make way for the proposed 4-storey, 130-bed hotel with ancillary restaurant. The development of the hotel will allow for landscaping and public realm improvements around the hotel building. Associated works include a new substation and associated plant to support the hotel and a relocated loading bay, moved away from the listed Avon House. The site’s existing car park will remain as is but will benefit from 6 x EV charging spaces and 4 x parking spaces futureproofed with EV charging infrastructure.



Proposed Site Plan

3.3 The proposed hotel is designed as an “L” shaped building for operational reasons, to make the most efficient use of the site and activate the site’s position along Anchor Springs and East Street.

- 3.4 The building's footprint is smaller than the supermarket meaning it is further back from the site boundaries than the existing supermarket building to allow for increased circulation space, public realm improvements and to enhance its relationship with the surrounding heritage assets.
- 3.5 The hotel will benefit from two visitor / pedestrian entrances. The main entrance is located centrally on the building's south elevation along Anchor Springs. A secondary entrance is proposed on the opposite (north) side of the building, predominantly to serve visitors who are walking across from the car park to the north.
- 3.6 The retained car park will provide 96 car parking spaces, including 8 disabled bays next to the existing pedestrian crossings. As mentioned, 6 x EV charging spaces are proposed and 4 x parking spaces will be futureproofed with EV charging infrastructure for when demand requires these to be installed. It is in Premier Inn's interest to provide its guests with EV charging and so it will respond to demand accordingly.
- 3.7 The applicant has been made aware of localised highways issues, principally relating to the schools to the north of the site at pick up and drop off times. An allowance in the hotel's car park management is therefore proposed which would help resolve this issue.
- 3.8 The three existing vehicular accesses off Avon Road and serving the site's car park will remain, as will the existing pedestrian crossings.
- 3.9 The site's delivery/servicing bay would be moved westwards along Avon Road to improve the site's relationship with Avon House, move it further from the East Street/Avon Road junction and to allow for easy access to the hotel's back of house areas. This would also provide a drop-off and pick-up location for disabled guests who can then use the secondary entrance.
- 3.10 New hard and soft landscaping would be provided as shown on the Landscaping Masterplan, resulting in a 130% biodiversity net gain. Outside seating would be provided to the south of the building serving the ground floor restaurant. A bench would also be provided for use by the public.
- 3.11 The hotel building would be made from different type and coloured bricks with recesses/shadow gaps, deep set windows and doors and blind windows to break the massing and provide visual interest. The proposed materials and treatment of the elevations reflects the historic context of the area and complements the surrounding buildings.

- 3.12 A detailed context analysis and the full design and massing strategy is provided in the supporting Design and Access Statement.



CGI of the proposed south and east elevations



CGI of the proposed north and east elevations

- 3.13 The hotel entrance, reception, cycle store for 14 bicycles, back of house and staff areas, refuse store, linen store, plant room and WCs would be located at ground floor level. The restaurant would also be on the ground floor and operated by Premier Inn for both hotel guests and non-hotel guests. It would benefit from an external seating area to the south.

- 3.14 A fully enclosed void space is also present at the western end of the ground floor. This space is surplus to the needs of the hotel due to flood risk restrictions.
- 3.15 The 130 hotel bedrooms and supporting linen rooms would be provided across the first, second and third floors. 7 universal access rooms are included in this provision (over 5% of the total rooms). All rooms would be accessible via internal staircases and lifts. The new hotel will be fully accessible.
- 3.16 The building's roof would accommodate two plant areas and solar panels. The accompanying Energy Statement sets out the contribution that this will make to the sustainability credentials of the hotel. The building has been designed and will be constructed to be a low carbon sustainable development.
- 3.17 A modestly sized new substation would be constructed to the west of the hotel and to serve the hotel.

The Operator – Premier Inn

- 3.18 The proposed hotel will be operated by Premier Inn, which is owned and managed by the Whitbread Group PLC. Premier Inn is the largest provider of hotel bedrooms in the UK, with over 800 hotels and over 80,000 rooms. Premier Inn has won awards from TripAdvisor and at the Business Traveller Awards as well as being a “Which? Recommended Provider” for ten years in a row.
- 3.19 Premier Inn has a web-based booking system available, in addition to the more conventional phone booking arrangement, and more than 99% of stays are arranged directly with the brand. Potential guests can book by requesting any named Premier Inn, or they can search for the nearest Premier Inn, using location/postcode information. The website service offers immediate and up-to-date information on room availability and price.
- 3.20 The nearest Premier Inn's are currently over 3 miles to the north and east of the application site outside of the Littlehampton BUAB in Arundel and East Preston and therefore serve different markets to the proposed hotel in the town centre of Littlehampton. Beyond these two hotels, the nearest Premier Inn hotel is in Bognor Regis, approximately 7 miles away.
- 3.21 Premier Inn offers good, reliably high-standard overnight accommodation at modest cost, and with a guarantee of a full refund if any guest is not satisfied with any aspect of the

accommodation. It is this consistently high level of service and good quality that attracts many business and leisure guests year-round.

- 3.22 Premier Inn is passionate about delivering great hotels into new locations and aspires to make a positive difference to the towns and communities that it becomes a part of.

Job Creation and Development Opportunities

- 3.23 Whitbread are committed to investing the communities where it operates. As one of the UK's largest employers, operating across the UK, the company recognises that it can make a difference within its communities. The company needs capable, dedicated employees to sustain the growth and success of the business and it is passionate about, recruiting, up skilling and retaining great people. Whitbread want people to feel empowered and grow long term careers within the business.

- 3.24 For many years, Whitbread has worked closely with government and industry leaders to help influence continued investment in nurturing skills and developing careers within the hospitality sector. Whitbread believe this will support fledgling careers, break down barriers for young people, and provide opportunities for people not in employment and without education or training.

- 3.25 Whitbread employs over 37,000 people in the UK and has been rated as a 'Top Employer' by the Top Employers Institute for 15 consecutive years. It runs an award-winning career and talent development programme investing £12 million every year on training its teams. The fundamentals for its people and jobs story are:

- No zero hours contracts – all of its team members have full time or flexible contracts;
- Whitbread always recruits locally – Whitbread partners with Job Centre Plus to advertise and fill roles, ensuring the benefits of our new developments are retained locally;
- Whitbread has a focus on attracting people from NEET backgrounds – it targets 50% of new site roles to be taken by NEETs;
- Whitbread is a flexible employer – it offers returning to work initiatives, split shifts and packages to suit its team members;
- All Premier Inn employees are paid at or above the National Living Wage; and

- Whitbread's Pay for Progression model enables team members to be rewarded for developing skills and abilities through tailored training programmes.

- 3.26 In addition to the above, Whitbread offers a broad range of qualifications and apprenticeships from level 2 through to the new level 5 programme. Its apprenticeship programmes, delivered in partnership with training provider Lifetime, provide opportunities for people to enter the workplace and benefit from training and development whilst they work. To date, more than 3,300 full-time apprenticeships, 4,150 work experience placements and 3,750 employment placements have been set up across Premier Inn and Whitbread restaurant brands.
- 3.27 The proposed development is expected to create around 75 net additional jobs during the construction phase and 32 FTE jobs when operational. Whitbread will always seek to recruit staff from the local area and operating town of the hotel, in this case from Littlehampton.
- 3.28 In addition, Premier Inn has a target for 50% of new jobs in hotels to be taken by those not in employment, education, or training (NEETs) aged 16 – 24 years old.

Consultation

Pre-application Advice

- 3.29 Pre-application advice (ref: PAA/103/24/) was sought from Arun District Council for the proposed development in November 2024. In January 2025, the Council's written response confirmed that the principle of the development was acceptable, but a number of changes in terms of height/scale, appearance and landscaping were requested.
- 3.30 In addition to setting out the required supporting surveys and reports required for a formal submission, the pre-app response also requested that the following points be addressed in any future scheme:
- Lowering the eastern end of the building
 - Omitting the mansard roof
 - Consider moving the loading bay
 - Reducing the extent of the proposed under-croft area
 - Additional detailing and vertical articulation on the elevations to break up the facade
 - Relationship between hotel bedrooms and existing buildings
 - On-site renewable or low carbon energy generation
 - A biodiversity net gain

3.31 The District Council's pre-application advice letter is provided in Appendix I.



Pre-app 1 scheme

3.32 Following the pre-application advice, the project architects undertook a substantial redesign to overcome the Council's design and massing concerns and address the above points. The accompanying Design and Access Statement sets out the response to some of the original pre-application comments in greater detail. An amended scheme (pre-app 2) was presented to the Council on 29 January 2025. The changes were as follows:

- Omission of the whole of the mansard floor level (lowering the height of the building and creating a flat roof with parapet) with some of the hotel bedrooms previously proposed at this level relocated on the ground floor.
- The shape and position of the building within the site altered to allow for this, move it further away from Avon House and allow for additional landscaping to soften the impact on the surrounding heritage assets.
- The undercroft element has also been omitted, main entrance position moved, secondary entrance added for guests coming from the car park and the active frontage extended.
- 'Blind' windows, recessed brickwork, recessed downpipes and coloured bricks added to improve the articulation and break up the massing of the building.
- The servicing bay has been moved further west along Avon Road, away from Avon House.
- A rooftop plant enclosure added to the least sensitive, west end of the building.



Pre-app 2 scheme

3.33 The pre-app 2 proposals were supported by the Council’s Planning and Conservation Officers, subject to some additional detailing on the elevations.

3.34 Further amendments were issued on 25 February 2025 following advice from the applicant’s drainage/flood risk consultant. This set of amendments removed all hotel bedrooms from the ground floor as well as the following design amendments following pre-app 2:

- Indicative signage zones added
- Alterations to the windows to provide symmetry on the eastern elevation and additional detail on the GF of the south elevation
- Extended tree planting between the hotel and Avon House
- Cycle parking within the building

3.35 Feedback was again positive, and no significant changes were requested.

- 3.36 Pre-application advice (ref:) was also sought from West Sussex Country Council in its role as the Highways Authority. The details of this pre-app response are provided in the accompanying Transport Statement.

Community Consultation

- 3.37 The applicant has been eager to create and build good relationships within the local community by keeping it informed and involved in the proposals. The proposals have been subject to extensive written, in-person, and online/virtual consultations with local residents and stakeholders as set out in full in the accompanying Statement of Community Involvement.
- 3.38 Feedback received during the various consultations was overwhelmingly positive. In particular, the design, economic and employment benefits and the proposals being a stimulator for further development were cited as strong reasons for support. The main areas of concern related to disruption during the construction period, impact on buses and occupation of the hotel room. Alterations to the design were also suggested. Full details of the public response to the scheme are set out in the accompanying Statement of Community Involvement.
- 3.39 Feedback from the public consultation events was incorporated into the submitted scheme as detailed in the Design and Access Statement.

4 PLANNING POLICY

- 4.1 This section of the Statement sets out the relevant planning policies at national level and at Development Plan level, as well as any other documents which are material planning considerations.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The duty is therefore for the LPA to exercise its judgement and consider many (sometimes) conflicting issues to decide whether planning permission should be granted. This will mean examining the Development Plan as a whole and taking material considerations which apply to the proposal into account. These must be properly considered otherwise the decision of whether or not to grant permission may be unlawful. This process is often termed the “Planning Balance”.
- 4.3 In this case, the Development Plan comprises policies from the Arun Local Plan (2018) and the Littlehampton Neighbourhood Plan (2014).
- 4.4 The National Planning Policy Framework (NPPF) is also an important material consideration.

The Development Plan

- 4.5 The Development Plan contains many policies covering all aspects of development within the Arun district. The key policies considered to be of most relevance to the proposed development are summarised below.

Arun Local Plan

- 4.6 Policy SD SPI states that the Council will take a positive approach to proposals, reflecting the NPPF and its support of sustainable development.
- 4.7 Policy SD SPIa seeks to promote and enable development which supports Littlehampton’s role as a main service, employment, retail and social centre. It specifically supports development that will benefit Littlehampton’s expanding leisure and recreation economies.
- 4.8 Policy SD SP2 sets out that development should be focused within the Built-Up Area Boundaries (BUABs) and will be permitted, subject to consideration against other policies of the Local Plan.

4.9 Policy EMP SPI promotes the sustainable growth of the District's economy to meet the varying needs of different economic sectors, support job creation and (inter alia) leisure development, especially in Littlehampton Town Centre. The policy supports and promotes a high-quality visitor economy.

4.10 The site lies within the Littlehampton Economic Growth Area, where Policy EMP SP2 applies. This policy states:

“The Council will work with partners to enhance local employment within the following Economic Growth Area [including the Littlehampton Economic Growth Area]

... Knowledge and cultural based employment as well as retail, leisure and office developments will be directed to the Economic Growth Area to promote their vitality, viability and regeneration...”

The Growth Area is specifically targeted as a location for hotel development to support the town's leisure and tourism functions.

4.11 Policy SKILLS SPI encourages development proposals that address barriers to employment for economically inactive people.

4.12 Policy RET SPI promotes tourism and leisure uses within the District's town centres, especially Littlehampton.

4.13 Policy RET DMI states that only use classes A1 to A3 will be allowed along secondary retail frontages.

4.14 Policy TOU SPI supports sustainable tourism development which protects the Council's main tourism assets. It sets out that proposals for visitor related development will be determined by Arun's capacity to absorb growth. This means tourism growth which:

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

4.15 Policy TOU DMI states that proposals for development which are likely to attract visitors will be supported provided that they:

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

Large scale proposals will generally be directed towards the Economic Growth Areas of Littlehampton and Bognor Regis

- 4.16 Policies D SPI and D DMI require all development to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from a thorough site analysis and context appraisal. Development should maximise opportunities for sunlight and passive solar energy and seek to enhance the public realm.
- 4.17 Policy ECC SPI requires development to be appropriately located and designed to adapt to the impacts arising from climate change such as the increased probability of tidal and fluvial flooding.
- 4.18 Policy ECC SP2 expects all new commercial development to be energy efficient and to demonstrate how they will achieve energy efficiency measures that reflect the current standards applicable at the time of submission. For major developments, where feasible, 10% of energy should be provided through decentralised, renewable and low carbon energy supply systems, such as solar panels.
- 4.19 Policy T SPI requires development to have acceptable transport and highway impacts, including access and parking.
- 4.20 Policy T DMI requires new development to allow for ease of movement and good access to public transport.
- 4.21 Policy HER SPI seeks to ensure development conserves or enhances the historic environment.
- 4.22 Policy HER DMI requires proposals to preserve or enhance the historic character, qualities and special interest of listed buildings and their setting.
- 4.23 Policy HER DM2 requires proposals to relate sensitively to local listed buildings.

- 4.24 Policy HER DM3 requires proposals to preserve or enhance the character or appearance of Conservation Areas.
- 4.25 Policy ENV DM5 requires development to achieve a net gain in biodiversity.
- 4.26 Policy W SPI and W DM2 require a site-specific Flood Risk Assessment to demonstrate that development will be appropriately located, safe without increasing flood risk elsewhere and served by appropriate drainage. The sequential test in accordance with the National Planning Policy Guidance must be met.
- 4.27 Policy W DM3 requires development to identify opportunities to incorporate Sustainable Urban Drainage Systems (SUDS), appropriate to the size of development.
- 4.28 Policy QE SPI seeks to ensure that development does not have a significantly negative impact upon residential amenity.
- 4.29 Policy QE DMI states that new noise generating development must be supported by a noise report. It must demonstrate that the development meets appropriate national and local standards for noise, and that mitigation measures ensure noise can be managed at an acceptable level.
- 4.30 Policy QE DM2 seeks to control light pollution to acceptable levels.
- 4.31 Policy QE DM3 requires major development proposals to assess the likely impacts of the development on air quality.
- 4.32 Policy QE DM4 promotes the redevelopment of previously developed land and the necessary remediation of contaminated land to allow this to happen.

Littlehampton Neighbourhood Plan

- 4.33 Policy 1 echoes Local Plan Policy SD SPI in setting a presumption in favour of sustainable development.
- 4.34 Policy 2 seeks to concentrate future economic development within the built up area boundary (BIAB) of Littlehampton.
- 4.35 Policy 17 states that non-designated heritage assets will be taken into account in determining applications in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of a proposal.

National Planning Policy Framework

- 4.36 The National Planning Policy Framework (NPPF) was first published in March 2012 with the aim of making the planning system less complex and more accessible. Revised versions have been published since with the latest in version published in December 2024. The NPPF is supplemented by the (ever evolving) Planning Practice Guidance (NPPG), first published in March 2014. These replace the much more detailed policy and guidance contained in the suite of Planning Policy Statement documents and elsewhere.
- 4.37 At the heart of the NPPF is a presumption in favour of sustainable development; development proposals that accord with the development plan should be approved without delay.
- 4.38 Paragraph 2 of this Framework states that it is itself a material consideration in planning decisions.
- 4.39 Section 2 of the NPPF puts emphasis on the importance of sustainable development. There are three dimensions to sustainable development: economic social and environmental. This section makes clear that planning should drive and support sustainable economic development and goes on to state that the planning system should do everything it can to support sustainable economic growth and that economic growth should be given “significant weight”.
- 4.40 Paragraph 39 of the NPPF deals with decision making and states that *“local planning authorities should approach decisions on proposed development in a positive and creative way... and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible.”*
- 4.41 Section 6: Building a strong, competitive economy states that *“planning policies and decisions should recognise and address the specific locational requirements of different sectors”*.
- 4.42 Paragraph 85 states that *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”*
- 4.43 Paragraph 86 explains that planning policies should be flexible enough to accommodate needs not anticipated in the plan. Whilst paragraph 87 is clear that: *“planning policies and decisions should recognise and address the specific locational requirements of different sectors”*.

- 4.44 Section 7 of the NPPF looks to ensure the vitality of town centres by taking a positive approach to their growth, management and adaptation.
- 4.45 Section 9: Promoting sustainable transport requires that *“opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised”*.
- 4.46 Section 11 is concerned with making effective use of land, and paragraph 124 states how *“planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”* Paragraph 125 states that planning decision should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs”*, and goes on to state *“planning policies and decisions need to reflect changes in the demand for land”*.
- 4.47 Section 12 concerns achieving well-designed places, and paragraph 131 sets out that *“good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
- 4.48 Section 14: Meeting the challenge of climate change, flooding and coastal change supports renewable energy and low carbon development. It goes on to address flood risk, stating (Paragraph 170): *“inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*
- 4.49 Paragraph 173 requires planning applications to undertake a sequential test to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. Development should only be allowed in areas at risk of flooding when the development is appropriately flood resistant, incorporates SUDS and risk can be safely managed. More detailed, specialist advice is provided within the Government’s Planning Policy Guidance (PPG).
- 4.50 Paragraph 174 states that *“the aim of the sequential test is to steer development to areas with the lowest risk of flooding from any source”* and outlines that development should not be permitted if there are other available sites suitable for the development within an area with a lower risk of flooding.

- 4.51 Section 16 provides guidance on application impacting heritage assets. Paragraph 215 states that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 4.52 In summary, there is in principle support for the proposed hotel development in this location at both a local and national level. This is subject to various tests and detailed consideration of other issues and material considerations, which will be addressed as part of this application.

Community Infrastructure Levy

- 4.53 Arun’s CIL Charging Schedule confirms that hotel development is not chargeable.

5 FLOODING SEQUENTIAL TEST

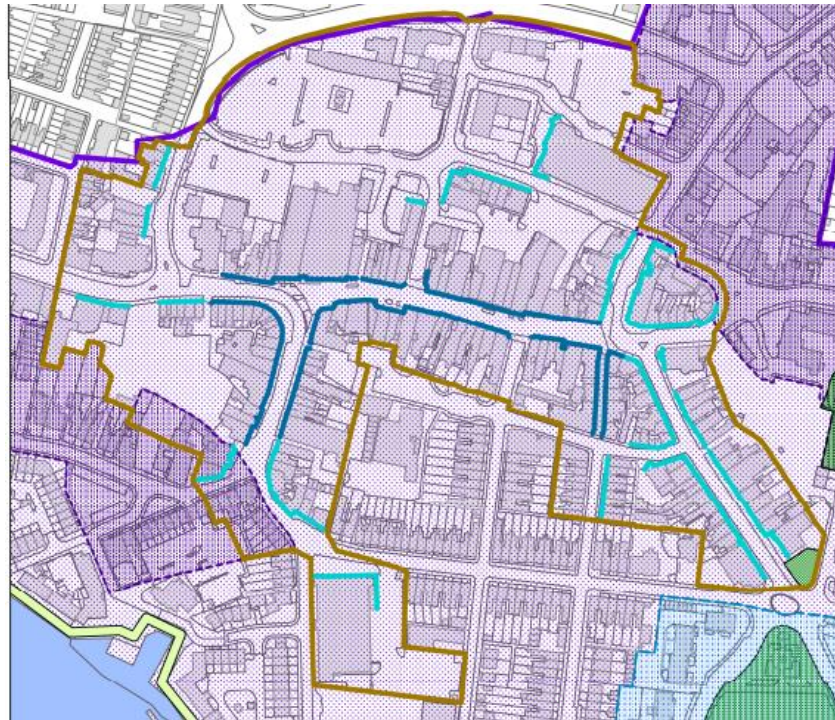
- 5.1 As set out in Section 2 of this document, the southeast section of the site resides within flood zones 2 and 3 (higher risk from rivers and sea). Albeit, a variety of raised walls and embankments are located along the banks of the River Arun that protect the surrounding area of Littlehampton from fluvial and tidal flooding. Actual flood risk therefore differs notably from the Flood Zones. Full details are included within the supporting Flood Risk Assessment.
- 5.2 The Flood Risk Assessment also confirms that the site is located within the Littlehampton Economic Growth Area, which *“is identified to be appropriate for residential uses in the Level SFRA. Both residential and hotel development are classified as “more vulnerable” uses in terms of flood risk, thus the development is considered to have passed the Sequential Test.”*
- 5.3 Despite this, the area of flood risk within the site being limited in its extent and no ground floor hotel bedrooms are proposed within it, a sequential test has been carried out for completeness and in accordance with the guidance set out within the Local Plan and National Planning Policy Framework (NPPF) to demonstrate that there are no other ‘available sites’ with a lower risk of flooding. The NPPF advises the sequential test must be applied to areas at risk of flooding from any source, now or in the future.

Methodology

Area of Search

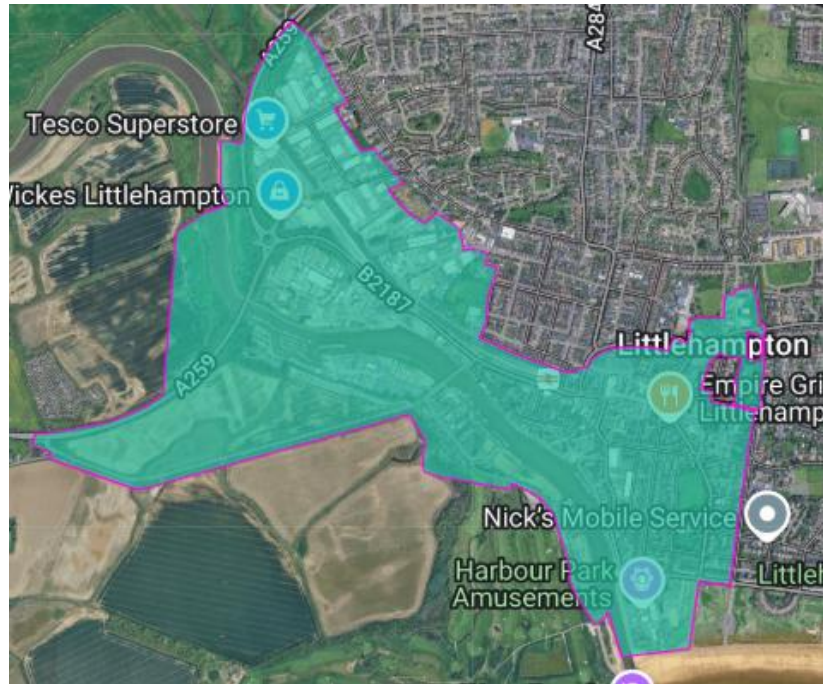
- 5.4 National Planning Policy Guidance outlines that the area to apply the test will be defined by local circumstances and the type of development proposed. The PPG defines a ‘reasonable available site’ as *“those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development”*.
- 5.5 With specific regard to hotels, Annex 2 of the NPPF classifies them as a main town centre use. The NPPF states that main town centre uses should be located in town centres as they are considered the most sustainable and accessible locations and the NPPF seeks to ensure the vitality of town centres. The application site is in accordance with the NPPF as it is located within Littlehampton Town Centre. Local planning policies also direct hotels to this area.
- 5.6 As guidance is clear that new hotel development should be directed to within town centres, the area of search for this sequential test is therefore contained to within Littlehampton Town

Centre. A separate 'out of town centre' sequential test would be required were the hotel proposed to be located outside of the Town Centre.



Littlehampton Town Centre Boundary (outlined in brown-) as defined within the Local Plan

- 5.7 Policy TOU DMI of the Local Plan also directs large scale tourist accommodation to the district's Economic Growth Areas. Littlehampton Economic Growth Area has also therefore formed part of the search area.



Littlehampton Economic Growth Area as defined within the Local Plan

- 5.8 It is worth noting that large parts of both Littlehampton Town Centre and the Growth Area are also in areas of higher flood risk.

Suitability

- 5.9 The size of a site is a factor in assessing its suitability. The application site measures 0.59 hectares and proposes 130 hotel bedrooms over four storeys. It will also use the existing car park to provide 96 car parking spaces. It is therefore relatively significant in size for a site within Littlehampton Town Centre but represents a reasonable minimum to accommodate a hotel scheme of this scale. It is clear from pre-app discussions that the building is at its max height within Littlehampton, so it would not be able to be built over more stories to reduce the site area.
- 5.10 To allow some flexibility, sites up to 10% over and under the site area of the application site have been considered (between 0.53 and 0.65 ha in area, and suitable for between 117 and 143 hotel bedrooms with ancillary restaurant, access, servicing, landscaping and circulation space). Sites outside of these parameters have not been assessed, as they would not be suitable for the proposed development.

Availability

- 5.11 Sites in the search area were identified through a number of sources, including a) sites allocated within the Local Plan and Neighbourhood Plan for development, b) sites within Littlehampton's Economic Growth Area and in the Housing and Economic Land Availability Assessment (HELAA), c) extant planning permissions for the same or similar developments to that sought, d) land currently for sale via various local agencies and website and e) sites on the Council's Brownfield Land Register.
- 5.12 Whitbread's Premier Inn estate is based on properties of which the Group is the freehold owner or where there is a long lease. The applicant has identified a need/demand for this development and intends to develop any site as soon as reasonably possible. For a site to be considered "available" there must therefore also be the real prospect of the freehold or long leasehold being obtained in the near future.
- 5.13 However, it would not be sufficient for a site to be on the market; any site must be available for development into a hotel. In practice, this means that it must be vacant (either greenfield, brownfield or containing vacant buildings that are fit for redevelopment into a hotel or can be easily/practically replaced). In addition, land protected by planning policy or identified for other forms of development in the Development Plan cannot be considered "available" for use as a hotel.

Viability

- 5.14 The site is not owned by the applicant, but a long lease has been agreed. This land deal has allowed the proposed development to be viable for the applicant, albeit margins are very tight and building costs continue to increase.
- 5.15 Another element that might affect a site's viability is its current condition. Any developer's preference is for a cleared and uncontaminated site. Any potential site that has either existing buildings on it or a history of industrial use is likely to bring with it unacceptable development costs involved in site clearance and decontamination. Such costs would make the project unviable.
- 5.16 Viability is also impacted by the location – similar to suitability – the site has to be well-suited to its hotel use, in this case a hotel to serve central Littlehampton.

Method

- 5.17 The order is significant in that a site that is unsuitable, being too small, big or having a planning policy objection to hotel use, is easier to identify than a site that is unviable, while any site may be available, at the right price, even if it is not openly on the market. A site which fails the first test is not then automatically assessed against the subsequent criteria. A site which satisfies that test can then be assessed on the basis of the second and, failing that test, does not have to be assessed against viability. Availability is probably the most prone of the three tests to uncertainty, given the involvement of third party landowners and developers, the lack of surety as to timescales and the uncertainties involved in securing planning permission, so many sites are ruled out at the outset.

Sequential Test Assessment

- 5.18 Sites in the search area were identified through a number of sources, including a) sites allocated within the Local Plan and Neighbourhood Plan for development, b) sites within Littlehampton's Economic Growth Area and in the Housing and Economic Land Availability Assessment (HELAA), c) extant planning permissions for the same or similar developments to that sought, d) land currently for sale via various local agencies and website and e) sites on the Council's Brownfield Land Register. These searches produced the following results.

PS12A - St Martins Car Park and Adjoining Site Avon Road Littlehampton

- 5.19 At 1.55ha, part of this site from the Arun District Council HELAA Report 2024 is a suitable size for the proposed development and would not require any demolition works.
- 5.20 The existing car park is however understood to be well used according the HELAA and there is no indication that the site is being promoted or is available. It is included in the HELAA's 'Not Currently Developable' list of sites. It is stated as a longer-term option for redevelopment which will need to be the subject of a master planning exercise. Negotiation over the purchase/long lease of the site would make the development time period beyond Premier Inn's allowances for the proposed hotel. It is therefore considered unavailable for the purposes of this sequential test.
- 5.21 There are also several constraints facing this site. This site forms part of an Existing Employment Site and a car park which is in use. The site is also prone to ground water flooding, with a TPO abutting the southwest corner of site and listed buildings within close proximity to southwest of site.
- 5.22 For the reasons above, the site is not sequentially preferable to the application site.



PS12A - St Martins Car Park and Adjoining Site Avon Road Littlehampton



NEWLU40 - Former Hospital Site, Fitzalan Road/Church Street

- 5.23 At 0.55ha, this site from the HELAA is a suitable size for the proposed development. However, would require demolition works of the existing healthcare facility.

- 5.24 The former hospital site has been allocated in the Littlehampton Neighbourhood Development Plan and has been included in the HELAA's 'Deliverable Neighbourhood Plan Allocations' list of sites. However, it is a longer-term option for redevelopment and has been ear-marked for residential development. The loss of a community healthcare facility would also have to be considered with appropriate provision provided elsewhere in Littlehampton. Negotiation over the purchase/long lease of the site would make the development time period beyond Premier Inn's allowances for the proposed hotel. It is therefore considered unavailable for the purposes of this sequential test.

- 5.25 This site falls outside of Littlehampton Town Centre and is also susceptible to groundwater flooding.
- 5.26 The site is not therefore sequentially preferable to the application site.



NEWLU40 - Former Hospital Site, Fitzalan Road/Church Street

- 5.27 In addition to the above suitable sites, the following 'deliverable', 'developable' and 'not currently developable' town centre (and those on the edge) sites within the 2024 HELAA, Littlehampton's Economic Growth Area, and the Council's Brownfield Register were discounted due to being unsuitable for the reasons set out in the below table. Some of these sites are also Key Priority Sites within the Neighbourhood Plan.

Site	Reason for being discounted
LU33A - Meadowfield House and Land to west of Fitzalan Road	<ul style="list-style-type: none"> • Too small (0.21ha net developable area) • Susceptible to groundwater flooding • Unavailable
LU33 - Former Ambulance Station East Street Littlehampton	<ul style="list-style-type: none"> • Too small - Part of the site has now received planning permission for 9 dwellings (LU/45/24/PL). • Unavailable (currently occupied by Sussex Police and Ambulance Service Emergency Services)
NEWLU41 - Littlehampton Fire Station, Maltravers Road	<ul style="list-style-type: none"> • Too small (0.18ha) • Archaeological Notification Area • Within Flood Zone 1, 2 and 3a, in addition to groundwater flood risk.
LU2 – Travis Perkins, Pier Road	<ul style="list-style-type: none"> • Within Flood Zone 2, & 3a • Potential Contaminated Land • Unavailable
18LU2 – 46a and 47 Pier Road and land north of Clifton Road Littlehampton	<ul style="list-style-type: none"> • Too small (0.07ha) • Outside of town centre • Within Flood Zone 3

I8LU3 - 90 & 91 South Terrace Littlehampton	<ul style="list-style-type: none"> • Too small (0.06ha) • Outside of town centre • Within Flood Zone 3
I00 - Harbour Park, Coastguards Road,	<ul style="list-style-type: none"> • Outside of town centre • Within Flood Zone 2 & 3a • Unavailable
LU25121 - 57 River Road Littlehampton	<ul style="list-style-type: none"> • Too small (0.045 ha) • Within Flood Zone 2 & 3a • Outside of town centre
NEWLU38C - Works units at Gloucester Road and Howard Road	<ul style="list-style-type: none"> • Within Flood Zone 3a when climate change is taken into account • Outside of town centre
21LH2 - Littlehampton Gas Holder Site Harwood Road / Gloucester Road Littlehampton	<ul style="list-style-type: none"> • Within Flood Zone 2 and 3a • Outside of town centre • Contaminated Land

5.34 Littlehampton Town Centre also includes a number of vacant commercial units, as photographed below. These can all be discounted as being either unavailable, due to their short-term leases or being under offer, and/or too small and therefore unsuitable.



2 - 4 Duke St, Littlehampton BN17 6EU



5 Arcade Rd, Littlehampton BN17 5AP



5 The Arcade, Littlehampton West Sussex England BN17 5AB



6 Arcade Rd, Littlehampton BN17 5AP



11 High St, Littlehampton BN17 5EG



23-25 Beach Rd, Littlehampton BN17 5JA



35 Beach Rd, Littlehampton BN17 5JA



36 High St, Littlehampton BN17 5ED



37 High St, Littlehampton BN17 5EG



38-40 High St, Littlehampton BN17 5ED



43 High St, Littlehampton BN17 5EJ



57 High St, Littlehampton BN17 5EJ



80-82 High St, Littlehampton BN17 5DX



88 High St, Littlehampton BN17 5DX

5.35 Purpose built office buildings and other commercial buildings (such as 88 High Street) could be of a size and scale that would be acceptable for hotel development. However, as well as being unavailable, these buildings can, depending on the individual site specifics, present significant challenges that render them to be unsuitable or unviable for conversion into hotel accommodation for some or all of the following reasons:

- They are purposely designed as office space or similar, usually of open-plan configuration. This means that they do not have sufficient or appropriately located external windows (or walls where new windows could be installed) to allow

conversion to hotel rooms. Conversely, they may have glass walls that are also unsuitable for hotel use.

- They are not currently supplied with adequate utilities to allow operation as a hotel. New water, electricity, wastewater and air circulation provision would have to be made for each bedroom, this would further impinge upon viability, even if technically possible.
- If unsuitable for conversion, they would not be viable due to requiring substantial demolition.
- Due to unavailability and lack of sufficient scale, further analysis has not been carried out to determine suitability.

Conclusion

5.36 The sequential test concludes that there are no sequentially preferable sites with a lower risk of flooding within or on the edge of Littlehampton Town Centre or Economic Growth Area that could accommodate the proposed development, are suitable, ‘reasonably available’ and viable.

5.37 The Littlehampton Economic Growth Area is identified to be appropriate for residential uses in the Level SFRA. Both residential and hotel development are classified as “more vulnerable” uses in terms of flood risk, thus the development is also considered to have passed the Sequential Test for this reason.

5.38 It should also be borne in mind that there will be no hotel bedrooms at ground floor level, the hotel will have 24-hour staff in place and the building has been designed to be flood resilient. As set out in paragraph 9.16 of the Flood Risk Assessment and Drainage Strategy:

“...the development can be occupied and operated safely and that there will be no increase in the level of flood risk to the site or neighbouring sites because of the proposed development.”

6 PLANNING ASSESSMENT

Principle of Development

- 6.1 Policy SD SP2 of the Local Plan confirms that development within the BUAB of Littlehampton will be accepted in principle provided it is in accordance with other relevant development plan policies which are provided in section 4 of this Statement and also referenced in this section.
- 6.2 The site that is subject of this planning application is previously developed brownfield land. It lies within Littlehampton Town Centre, Economic Growth Area and Built-Up Area Boundary (BUAB). It is a highly sustainable location in accordance with Policy SD SPI and SD SP2.
- 6.3 A hotel is defined as a main town centre use by the Government and therefore the proposed location is the most appropriate for the proposed use in accordance with Section 6 of the NPPF which makes it clear that *“planning policies and decisions should recognise and address the specific locational requirements of different sectors”*.
- 6.4 The adopted Development Plan documents (in particular Policies SD SPIa, RET SPI, TOU SPI and TOU DMI of the Local Plan and Policy 2 of the Neighbourhood Plan) make it clear that tourism, visitor and leisure facilities which assist and benefit Littlehampton’s role as a main centre within the district will be supported. There is clear support for development that will provide additional year-round quality visitor accommodation within Economic Growth Areas and Littlehampton Town Centre, which is exactly what the proposal does.
- 6.5 The Local Plan (through Policy EMP SP2) identifies the site as part of the Littlehampton Economic Growth Area where leisure development is specifically directed towards. Alongside the hotel, the proposal would provide the Town Centre with a new restaurant, supporting its vitality and viability in accordance with Policy EMP SP2.
- 6.6 The NPPF also places significant weight on supporting economic growth, especially when it seeks to address local needs.
- 6.7 As set out in the supporting Economic Impact Assessment, it is estimated that the proposed development will deliver the following economic benefits:
- A multi-million pound investment (approx £13.4 million);
 - 75 FTE construction jobs over the build period;

- 32 FTE permanent jobs when fully operational with recruitment focused on Littlehampton and the surrounding area;
- The potential for around 39,858 new overnight visitors per year.
- Linked spending within Littlehampton and the Arun district, supporting the viability of the town centre. Research suggests £3.1 million would be spent in the visitor economy every year.
- Research also shows how the branded style of accommodation provided by Premier Inn can healthily co-exist alongside independent hoteliers and guest houses in existing local markets.

6.8 Policy EMP SPI recognises that the tourism industry is important to Littlehampton's economy, job creation and key to meeting its regeneration objectives. As set out in section 3, Premier Inn will also actively seek to address barriers to employment for economically inactive people in accordance with Policy SKILLS SPI.

6.9 There is therefore unequivocal support for the principle of this hotel development in Littlehampton Town Centre from both local and national planning policies. This is exactly the type of development which Arun District Council should be supporting and for which planning permission should be granted.

6.10 Members of the public and local stakeholders were also largely supportive of the proposals, with many hoping and expecting it to be a stimulator for further economic growth within Littlehampton Town Centre.

6.11 The economic, employment and tourism benefits of the proposed development are significant and should be afforded significant weight in accordance with paragraph 85 of the NPPF. These benefits comfortably outweigh the loss of the very small amount of secondary retail frontage which the previous use provided. It is recognised by the Council in its pre-application response that whilst Policy RET DMI technically applies and the proposals conflict with the policy, the hotel is a suitable town centre use and Officers do not see this issue as an impediment to planning permission being granted.

6.12 When examining the Development Plan as a whole and taking material considerations which apply to the proposal into account, the application would be in accordance with relevant policies. Overall, the principle of the proposed development is not just acceptable, but actively encouraged and supported by the relevant Development Plan documents, such that the proposed development will significantly and demonstrably outweigh the very small loss of

secondary retail frontage. This is a view which is shared by the District Council's Planning Officers in their pre-application responses.

Design

- 6.13 The layout of the site and design evolution of the proposed hotel is discussed in detail in the supporting Design and Access Statement.
- 6.14 The proposals have been worked up with Walsingham Planning's heritage consultant and follow three rounds of pre-application discussions with the Council's Planning and Conservation Officers and extensive community and stakeholder consultation. The amended proposals were supported by the Council's Planning and Conservation Officers.
- 6.15 The proposals make efficient use of a long term vacant and underutilised town centre site. The proposed hotel is designed as an "L" shaped building for operational reasons, to make the most efficient use of the site and activate the site's position along Anchor Springs and East Street. Although taller than the existing supermarket building, the hotel's footprint is markedly smaller which has allowed for improved public realm, landscaping and relationships with surrounding buildings.
- 6.16 The hotel has been designed to be a building architectural merit through the use of high quality materials and simple, considered detailing to create an elegant building befitting of this prominent central site and which reflects and complements the character of surrounding buildings. The proposals comply with the Arun District Council Design Guide, Policies D SPI, D DMI and TOU DMI of the Local Plan and the Neighbourhood Plan.

Sustainability

- 6.17 The proposed hotel will be one of a new generation of Premier Inn hotels which will help Whitbread achieve its objective to become a net zero business (for scope 1 and 2 emissions) by 2040.
- 6.18 As set out in the accompanying Design and Access Statement and Energy Strategy the hotel is targeting a BREEAM 'excellent' rating. In order to achieve this, the 'Be Lean, Be Clean, Be Green' stages have been followed.
- 6.19 The following measures have been incorporated into the design and building of the hotel:

- A building fabric first design philosophy - a minimum 35% CO2 emission reduction through energy efficient building fabric and systems
- The hotel is to be designed as fully electric with the use of Air Source Heat Pumps (ASHP) and Mechanical Ventilation and Heat Recovery (MVHR)
- Water saving measures including dual-flush WCs, low-flow water fittings, rainwater collection and recycling)
- Solar photovoltaic (PV) panels
- Low energy LED lighting

6.20 As concluded in the Energy Strategy, these measures will provide a sustainable, low energy building exceeding the 10% minimum requirement for renewable energy generation required in Policy ECC DMI SP2.

Heritage

6.21 The east of the site borders Littlehampton's East Street Conservation Area. Avon House and its boundary wall (to the north of the main building) are Grade II Listed. There are additional Grade II Listed buildings further north and east, as well as locally listed buildings. The accompanying Heritage Statement includes a full survey of nearby designated and non-designated heritage assets and impact assessment of the proposals on them.

6.22 The applicant has amended the proposals during the course of the pre-app discussions to improve the hotel building's relationship with the heritage assets, most notable Avon House which will benefit from a greater separation distance from the building, the relation of the delivery/servicing bay and new landscaping/public realm improvements.

6.23 The Statement concludes that there would be less than substantial harm to heritage assets, and at the low end of the less than substantial scale. In accordance with the NPPF and Policies HER SPI and HER SPI of the Local Plan, the harm identified will be comfortably outweighed by the public benefits of the proposed development which are set out in paragraph 6.7 of the Heritage Statement.

Transport

6.24 The application site includes the vacant supermarket's car park which will provide 96 parking spaces. The car park has been closed since Waitrose left the site. When reopened the car park will provide 8 disabled bays next to the existing pedestrian crossings and 6 x EV charging spaces with servicing for a further 4 spaces for when demand requires these to be installed.

A dedicated cycle store will be provided on the ground floor for 14 bicycles. Guests are also permitted to keep their bikes within the hotel rooms.

- 6.25 The site is sustainably located in Littlehampton Town Centre allowing access to the proposed hotel via a range of alternative active and sustainable transport modes to the private car for both staff and guests in accordance with Policy TOU DMI. This enables guests convenient access to a range of amenities and leisure attractions via sustainable modes during their stay, as well as staff when commuting to the site. WSCC welcomed the opportunity to encourage more sustainable modes of transport and a Travel Plan has been prepared to encourage and monitor this.
- 6.26 RGP has produced an accompanying Transport Statement which assesses existing and proposed trip generation and parking demand for the site. RGP has considerable experience in supporting new-build Premier Inn hotels and extensions to existing Premier Inn hotels. As a result, it is very familiar with the operational characteristics of Premier Inn hotels such as the one proposed and holds a wealth of survey data in relation to traffic generation and parking demands.
- 6.27 Should the car park experience full capacity, RGP's Transport Statement concludes there would be sufficient car park capacity within walking distance to accommodate the demands associated with hotel guests and staff. Owing to their nature, primarily serving town centre commercial uses and leisure destinations, surrounding public car parks experience most demand during the daytime when local shops and businesses are open for trade. However, in the evenings, overnight and early mornings, when these businesses are closed / less busy, the demand for general town centre parking is low. The public car parks therefore operate in a complementary manner to the Premier Inn hotel which generates a peak demand for parking during the late evening and overnight, whilst during the daytime, the requirement for hotel parking is significantly reduced.
- 6.28 The Transport Assessment also confirms that the traffic impact of the proposed development would not be significant and substantially less than the existing supermarket use of the site.
- 6.29 The applicant has also been made aware of existing localised highways issues, principally relating to the schools to the north of the site at pick up and drop off times. An allowance in the hotel's car park management is therefore proposed which would help resolve this issue.

- 6.30 Vehicular access would remain from Avon Road to both the car park and hotel delivery/servicing bay. The site's pedestrian crossings would also remain.
- 6.31 The delivery/servicing bay would also provide a drop-off and pick-up location for guests.
- 6.32 The hotel would generate approximately 14 service vehicle movements per week, which equates to approximately two service vehicle movements per day. Details of these are provided in the below table. The table is taken from the accompanying Delivery and Servicing Management Plan which seeks to agree these arrangements with the LPA and protect residential amenity for those nearest neighbours.

Type	No. Visits	Duration	Timings	Activity
Linen	7	30 mins	06.30 – 18.00	1.5 m ³ cages on wheels
Food	3	40 mins	06.30 – 18.00	trolley with 1m x 1.2m pallets
Drinks	1	45 mins	06.30 – 18.00	trolley with 1m x 1.2m pallets
Refuse / Recycling	3	20 mins	06.30 – 18.00	Bins emptied

Expected delivery and servicing frequency and duration arrangements per week

- 6.33 The modest delivery and servicing frequencies at the site would not represent an intensive level and it is in Premier Inn's own interests to keep these movements within appropriate hours. Premier Inn operate a 'Good Night Guarantee' initiative which permits guests to claim a refund if they have not had a satisfactory nights' sleep. In order to achieve this and minimise any disruption to guests during the night, delivery and servicing activities are scheduled outside of these hours at off-peak times. The applicant is willing to accept a reasonably worded condition on any planning permission controlling the hours for servicing/deliveries.
- 6.34 A Construction and Environmental Management Plan is also submitted and again seeks to manage construction activities in agreement with the LPA and protect residential amenity for those nearest neighbours. The Plan seeks to limit construction works on the site between the following times:
- Monday to Friday: 07:00 – 18:00;
 - Saturday: 08:00 – 13:00; and
 - No Sunday, Bank Holiday or Public Holiday working.

- 6.35 Pre-application discussions have been held with WSCC which confirmed that it did not hold any significant in principle objections to the proposed development from a highways and transport perspective. This included the number of parking spaces, access arrangements and the proposed service/delivery bay along Avon Road.
- 6.36 It is concluded that the proposed development is acceptable from a highways and transport perspective in accordance with Policies T SPI, T DMI and T DM2 of the Local Plan and the Neighbourhood Plan.

Neighbouring Residential Amenity

- 6.37 A daylight and sunlight assessment has been carried out to understand the impact of the proposed development on neighbouring receptors. The results are provided in the supporting Daylight and Sunlight Report which shows that properties will not experience a noticeable change in daylight and sunlight and therefore full compliance to BRE guidance.
- 6.38 In terms of separation distances between the proposed hotel and neighbouring residential dwellings, the hotel will be set back further from the boundaries of the site and the habitable rooms of those residential dwellings on the opposite side of Avon Road and East Street than the existing building. The extent of which is shown on the Proposed Site Plan with the faint hatched line showing the outline of the existing building. The nearest residential buildings to the hotel will be those on the opposite side of East Street. However, the hotel's east elevation will only include blank windows and so there will be no overlooking/privacy issues.
- 6.39 Avon House is marginally below the recommended 16m separation distance set out in the Arun District Design Guide between dwellings' front windows. However:
- The hotel will be set back further from the boundaries of the site than the existing building.
 - The delivery/servicing bay has been moved away from Avon House which is considered a key benefit from the local planning authority.
 - Avon House will benefit from new landscaping between the two buildings.
 - The proposals achieve full compliance with BRE guidance.
 - The previously approved/lapsed scheme proposed residential windows and balconies a similar distance (approximately 14.5m - 15m) away from and facing Avon House. No balconies are proposed as part of the hotel scheme. The distance was considered acceptable to prevent material harm resulting from overlooking.

- 6.40 The Arun District Design Guide is guidance only and allows for specific site circumstances to be considered. On this basis, the proposed arrangement is considered to provide an acceptable level of privacy and light in accordance with Policy QE SPI and an overall betterment to the living conditions of Avon House.
- 6.41 By their nature hotels are not noisy land uses or inappropriate neighbours, especially when, like Premier Inn, the operators have a policy of refunding payments to guests whose sleep is disturbed or otherwise inconvenienced, making it very much in their own interests to ensure responsible behaviour from their guests.
- 6.42 A Noise Impact Assessment is submitted in support of this application as the hotel will require building services plant which will be located on the roof. The proposed plant comprises 12 x air-conditioning units, 4 x air-to-water heat pumps, and a kitchen supply and extract fan, with associated condenser units.
- 6.43 Arun District Council does not specify any objective criteria in its planning policies in regard to acceptable noise levels. Therefore, the assessment of plant noise emission has been undertaken in accordance with good practice guidance and the relevant British Standard. Premier Inn also has its own internal noise standards which are more onerous than those found within British Standard 8233. The Noise Impact Assessment seeks to ensure there will be a 'low impact' at the nearest noise sensitive receiver. Low impact is classed as below the existing background sound level at all times at the nearest neighbouring properties.
- 6.44 In this instance the nearest receptors for any noise are the hotel bedrooms, rather than other residential dwellings. Nevertheless, the Noise Assessment considered potential noise impact at the nearest dwellings as shown in Figure 4-2 of the Noise Impact Assessment.
- 6.45 The Assessment follows background noise surveys carried out during the late evening and night-time periods to determine existing ambient and background noise levels. The Assessment concludes that, based on a worst-case scenario, the site can be developed as a hotel without causing significant impact or disturbance to existing and future residents or occupants of the proposed hotel in accordance with Policies QE SPI and QE DMI.
- 6.46 To achieve a low impact, plant is recommended to be operate at 70% during the daytime, and to 50% overnight. In order to achieve the internal noise criteria targeted by Premier Inn, the Assessment also recommends façade specifications. The scheme meets all of the recommendations of the Noise Impact Assessment.

- 6.47 A total of 14 delivery vehicle visits would be anticipated over the course of a typical week, equating to an average of two delivery vehicles visits per day, as set out in the Delivery and Servicing Management Plan. The timings of deliveries can be controlled by a suitably worded conditions to ensure there would not be an unacceptable impact upon residential amenity.
- 6.48 In addition to attenuation of noise, kitchen odours will be appropriately mitigated and dispersed, and the design of the extract system will be informed by the submitted Kitchen Extract Odour Report.
- 6.49 Other amenity impacts, such as dust and vibration are only likely to result from the construction phase, not the operational phase. These impacts will be temporary and can be controlled through condition and compliance with the submitted Construction Environmental Management Plan, which provide a considered approach to how the potential impact of construction would be minimised and mitigated against.
- 6.50 An Air Quality Assessment has been produced which confirms that the proposed development will have a low to negligible effect on air quality in the local area in accordance with Policy QE DM3.
- 6.51 Equally, an External Lighting scheme is submitted which demonstrates that the proposed development would not create unnecessary or detrimental levels of light pollution in accordance with Policy QE DM2.
- 6.52 The proposals and supporting documentation demonstrate that amenity has been considered and appropriate solutions incorporated into the scheme in accordance with the Development Plan.

Ecology

- 6.53 Accompanying the application is a Biodiversity Net Gain Report and Preliminary Ecological Assessment.
- 6.54 The site incorporates minimal ornamental planting and therefore has a low baseline habitat level. With the introduction of new soft landscaping as shown on the Landscaping Masterplan, the proposal would offer a 130% biodiversity net gain.
- 6.55 The Ecological Impact Assessment concludes that the site holds little of ecological interest. No protected species were recorded as being present on the site however, recommends

precautionary measures pre and during construction to ensure there will be no impact upon protected species in accordance with Policies ENV SPI and ENV DM2.

Flood Risk and Drainage

- 6.56 As previously stated, according to the Government's Flood Map for Planning, the southeast part of the site is located within Flood Zone 3a.
- 6.57 The development would not increase flood risk elsewhere as the proposed hotel building footprint would be substantially smaller than the former Waitrose building that it replaces.
- 6.58 A sequential test has however been carried out in accordance with Policies W SPI and W DM2 and the NPPF. It concludes that there are no sequentially preferable sites with a lower risk of flooding within or on the edge of Littlehampton Town Centre or Littlehampton Economic Growth Area that are 'reasonably available' and could accommodate the proposed development.
- 6.59 The exception test is also passed as set out in the Flood Risk Assessment.
- The proposed hotel building has been designed to be flood resilient. It does not include any hotel bedrooms at ground floor level with uses at the ground floor limited to 'less vulnerable' uses. Flood resistance construction measures will also be used up to a level of 0.6m above the proposed ground floor level. Safe access egress to and from the development would also be possible in a flood event.
 - The wider sustainability benefits to the community set out in paragraph 6.62, the Economic Impact Assessment, Heritage statement and the supporting Energy and Sustainability Assessment outweigh the flood risk.
- 6.60 Proposed surface water and foul water drainage strategies are also provided in support of the application and following consultation with Southern Water.
- 6.61 The surface water drainage strategy incorporates SUDS in the form of attenuation tanks in accordance with Policy W DM3. Surface water will discharge into an existing surface water sewer. It would provide significant betterment over the existing situation.
- 6.62 Foul water from the development will be discharged into the existing foul water sewer on East Street. Southern Water has confirmed that existing sewer network has adequate capacity in the local sewerage network.

6.63 The Assessment concludes that, with the proposed recommendations, the development can be occupied and operated safely and that there will be no increase in the level of flood risk to the site or neighbouring sites as a result of the development. Therefore, the development can be considered acceptable in terms of flood risk and in accordance with Policies W SPI, WDM2 and ECC SPI.

Summary

6.64 In summary, the principle of the development is supported by policy at the local and national level. The hotel is a town centre use proposed to be located within Littlehampton Town Centre and within Littlehampton's Economic Growth Area.

6.65 The proposed development will deliver the following benefits:

- Regeneration and redevelopment of a redundant town centre site including provision of active frontages, new areas of public realm and landscaping which enhance the appearance of the town centre and the approach into the conservation area.
- The construction phase of the proposed development is anticipated to equate to a £13.4 million investment in Littlehampton and will support approximately 75 full-time equivalent (FTE) temporary (gross) jobs over the build period in a range of both skilled and unskilled positions.
- New employment opportunities for local people through the creation of 42 jobs on-site, which will equate to 32 direct FTE permanent jobs. The applicant targets 50% NEETs and all employees have access to a variety of high-quality training and development programmes, including apprenticeships to support career progression and personal development.
- Diversification of the tourism accommodation offer in the Arun District – The district is dominated by small self-catering units and the majority of visitor bedspaces are located in Bognor Regis. The proposals would create good quality budget hotel accommodation and contribute towards meeting the need for additional visitor accommodation within Littlehampton (as identified within the 2023 Arun District Visitor Strategy).

- Uplift in visitor expenditure within the area – it is estimated that the proposed development is worth an estimated £3.1 million to the local economy per annum and will support around 33 additional local tourist jobs.
- Provision of measures to encourage travel by sustainable non car modes – including improved and enlarged pedestrian routes, cycle parking and the provision of electric vehicle charging points. The proposed hotel and restaurant is situated in a location where travel by alternative modes is realistically achievable being within walking distance of the town centre and bus station.
- The proposed development through the provision of up to an additional 39,858 overnight stays in Littlehampton will support additional investment and growth in the visitor economy in the area in line with the Arun District Visitor Strategy (2023).
- An 181% biodiversity net gain.
- An improvement to the setting of and ability to appreciate the surrounding listed buildings and conservation area.
- Improved passive and active security around the site.
- A sustainable urban drainage system (SUDS).
- Reduced pressure on local highway at school pick up and drop off times.

6.66 There is unequivocal strong support for economic development and additional year-round quality visitor accommodation in Littlehampton Town Centre and there are no other material considerations which indicate that planning permission should not be granted.

7 PLANNING BALANCE AND CONCLUSION

- 7.1 Planning permission and listed building consent is sought for the demolition of the vacant supermarket building; erection of four-storey hotel and restaurant building; public realm and landscape improvements; retention of associated car park and all associated works on the site of the former Waitrose supermarket on Anchor Springs and Avon Road in Littlehampton.
- 7.2 The application site is a vacant supermarket and associated car park.
- 7.3 Planning permission has previously been granted for the redevelopment of the site but this has now lapsed.
- 7.4 The proposals follow three sets of pre-application advice with the District Council, pre-application advice with the County Council (Highways) and extensive stakeholder and public consultation. Proposals have been amended to address the advice and feedback received.
- 7.5 The Development Plan and NPPF direct hotel development to town centres and economic growth areas. The site is within both of these.
- 7.6 The hotel will deliver a significant benefit in terms of its contribution to the labour market, economic productivity and visitor economy of Littlehampton and the wider area. There is therefore a clear justification and in principle policy support for this application.
- 7.7 The design is high quality, appropriate and complementary to the surrounding area.
- 7.8 The proposals will deliver a biodiversity net gain.
- 7.9 There will be no detrimental impacts on residential amenity.
- 7.10 There would be sufficient car parking capacity to accommodate hotel guests and staff and the site is perfectly located to encourage the use of sustainable transport methods.
- 7.11 The various supporting reports demonstrate that there are no material considerations that indicate that this application should not be granted.
- 7.12 The proposals are sustainable, meet a local community need and comply with the provisions of the Development Plan and the NPPF, such that they should be supported, and planning permission granted by Arun District Council.