

Land at Norway Lane, Littlehampton

Planning Statement

In support of:

“Part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), leisure and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works”

On behalf of:

Hallway Properties Limited

May 2025

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SCHEDULE OF SUBMITTED PLANNING APPLICATION DOCUMENTS

Application Document	Author	Date
Planning Application Form and Certificate	Freeths LLP	16 th May 2025
Completed CIL Information Form	Freeths LLP	16 th May 2025
Planning Statement	Freeths LLP	May 2025
Retail Assessment (Sequential and Impact)	Freeths LLP	May 2025
Design and Access Statement (Rev D)	RGP	April 2025
Marketing Statement	SHW/DTRE	April 2025
Transport Assessment	Connect Consultants	April 2025
Travel Plan	Connect Consultants	May 2025
Statement of Community Involvement	Cratus	April 2025
Ecological Impact Assessment	FPCR	May 2025
Biodiversity Net Gain Assessment & Metric	FPCR	May 2025
Arboricultural Impact Assessment	FPCR	May 2025
Air Quality Assessment	TRC	May 2025
Flood Risk Assessment and Drainage Strategy Report	Pinnacle	April 2025
Ground Conditions Survey and Report	Pinnacle/Delta Simons	April 2025 / March 2019
Low Carbon Report & Sustainability Statement	ITD Consultants	April 2025
Noise Impact Assessment	Sharps Redmore	April 2025

SCHEDULE OF SUBMITTED PLANNING APPLICATION DRAWINGS

Drawing Title	Drawing Reference
Determination Drawings:	
Location Plan	11631-PL01_A
Existing Site Plan/ Topographical Survey	11631-PL02_C
Existing Ground Floor Plan	11631-PL03_B
Existing First & Second Floor Plan	11631-PL04_A
Existing Roof Plan	11631-PL05_A
Existing Elevations Units 5 & 6	11631-PL06_A
Proposed Demolition Plan Units 5 & 6	11631-PL07
Proposed Site Plan	11631-PL08_E
Proposed Ground Floor Plan	11631-PL09_E
Proposed Mezzanine Floor Plan	11631-PL10_E
Proposed Roof Plan	11631-PL11_F
Proposed Elevations & Sections	11631-PL12_E
Proposed Contextual Elevations	11631-PL13_D
Green Infrastructure Strategy	12641-FPCR-ZZ-ZZ-DR-L-0001-P06
Illustrative only:	
CGI View 1	11631-CGI-View 1 Rev_E
CGI View 2	11631-CGI-View 2 Rev_E
CGI View 3	11631-CGI-View 3 Rev_A
CGI View 4	11631-CGI-View 4 Rev_E
CGI View 5	11631-CGI-View 5 Rev_E
CGI View 6	11631-CGI-View 6 Rev_E
CGI View 7	11631-CGI-View 7 Rev_D
CGI View 8	11631-CGI-View 8 Rev_D

1. INTRODUCTION

1.1. This Planning Statement has been prepared by Freeths LLP on behalf of Hallway Properties Limited (“the Applicant” or “Hallway”) in support of an application for full planning permission for the proposed redevelopment of Land at Norway Lane, Littlehampton, West Sussex, BN17 6LS (“the site”) to provide a retail (food and non-food), leisure and food & beverage scheme (Class E) (“the proposed development”).

1.2. The description of development is as follows:

“Part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), leisure and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works.”

1.3. The planning application is intended to deliver a new retail, leisure and food & beverage development to serve the Littlehampton urban area and surrounding settlements. The proposed development represents an important opportunity to redevelop a vacant previously developed site in an accessible urban location. The scheme has been formulated to revitalise and energise the site, introducing new retailers and businesses to provide greater choice and convenience for the residents of Littlehampton and the wider area.

1.4. The planning application has been submitted following pre-application discussions with your Council’s officers since October 2023 and more recently community and stakeholder consultation which concluded in March 2025. The proposed development will deliver a number of important public economic, social and environmental benefits for the town and wider community. These can be summarised as:

- Important inward investment into the Littlehampton economy reversing a failing site, which has no reasonable prospect of being re-used or redeveloped for industrial or office use.
- Re-use of a vacant, brownfield site in a sustainable location.

- Provision of an enhanced and inviting commercial environment to reverse decline following vacancy.
 - Introduction of a range of new multiple retailers and operators to Littlehampton. The decision to progress a retail scheme is based on retailers wanting to be both in Littlehampton and this site specifically compared to potential alternatives.
 - Supporting expansion of existing retailers in the town.
 - Improve convenience and accessibility in this part of Littlehampton and the town's offer overall including new fascias to make a key qualitative difference.
 - New non-food retailers to the town to improve local access to key retail sectors and reduce loss of trade to surrounding areas and on-line shopping.
 - Creation of circa 250 retail industry jobs in Littlehampton and spin-off opportunities for the local supply chain.
 - Improved pedestrian accessibility for residents from the south across the A259.
 - New planting and biodiversity net gain through on and off-site measures.
- 1.5. This Statement will describe the site and its locality; consider the prevailing planning policy; and assess the proposed development. The Statement will identify the relevant components of the Development Plan (that being the Arun District Council Local Plan (2018) and the Littlehampton Neighbourhood Plan (2014)) and other material considerations that would justify the grant of planning permission.
- 1.6. This Statement should be read in conjunction with the submitted drawings and supporting technical documents that comprise the planning application, as listed above.

1.7. The remainder of this Statement is set out as follows:

- **Section 2:** provides a description of the site and the surrounding area, together with the site's planning history and details of the pre-application engagement undertaken;
- **Section 3:** provides a description of the proposed development;
- **Section 4:** sets out an overview of the relevant planning policy context of the site and the proposed development;
- **Section 5:** sets out an assessment of the proposed development against the Statutory Development Plan and material considerations; and
- **Section 6:** provides an overall summary and conclusions.

2. KEY BACKGROUND INFORMATION

Application Site

- 2.1. The site subject to this planning application comprises Land at Norway Lane, Littlehampton, West Sussex, BN17 6LS, also known as Watersmead Business Park.
- 2.2. The site currently comprises a vacant office building (Unit 7) (which at the time of writing is under demolition – see planning history section below for further details), and two vacant distribution warehouses (Units 5 & 6) with associated car parking, landscaping and access.
- 2.3. The extent of the site is identified on the Site Location Plan provided as **Appendix 1**. The red line site area extends to 4 hectares. The office building (Unit 7) was previously occupied by The Body Shop (being purpose built for them around 30 years ago) as their head office. The distribution warehouses (Units 5 & 6) were also purpose built for The Body Shop but were most recently occupied by Amazon as distribution warehouses.
- 2.4. The existing floorspace and date of last occupation of each unit is in Table 1 below:

Table 1: Existing Site Floorspace & Status

Existing Unit	Date of Last Occupation	Existing Floorspace (GIA) (sqm)
Unit 5 (including east and west wings and walkway link)	6 th September 2024	5,920
Unit 6 (including gas kiosk)	6 th September 2024	6,775
Unit 7	1 st October 2024	6,296
Total	-	18,991
Total (excluding Unit 7)		12,695

Source: Hallway

- 2.5. The site is accessed via a number of existing access points off Norway Lane. Norway Lane is in separate ownership with access rights available to the Applicant.

Surrounding Area

- 2.6. To the north of the site is a large distribution warehouse (which does not form part of the site and is in separate ownership). To the west, on the opposite side of Norway Lane, are residential dwellings. To the south and east is the A259 (Worthing Road), with residential dwellings beyond. The site lies in a largely mixed-use commercial and residential location.

- 2.7. The Proposals Map confirms the site is subject to the following:

- Not subject to any specific allocations or designations.
- Located within the Built-Up Area boundary of Littlehampton.
- North-eastern corner to the immediate east of Unit 6 lies in a Biodiversity Opportunity Area (“BOA”).

- 2.8. The Proposals Map also confirms the surrounding designations:

- To the south east of the site is the Littlehampton Cemetery which is designated open space.
- The road to the south west is listed under Policy TSP3 (h) as the A259 Fitzalan Link - Body Shop roundabout improvement.

- 2.9. The site is also subject to the following:

- Within Flood Risk Zone 1.
- Localised pockets of surface water flood risk ranging from low to high risk.
- North-eastern corner lies within the Impact Risk Zone (“IRZ”) of the Arun Valley Special Protection Area (“SPA”), Ramsar and Special Area of Conservation (“SAC”).

- 2.10. There are no recorded Tree Preservation Orders (“TPO”) on the site or on its boundary. The site does not contain any statutorily or locally listed structures and is not in a Conservation Area. There are no designated heritage assets in the immediate setting or wider vicinity. The site is not in an Air Quality Management Area (“AQMA”) and is outside the designated Archaeological Notification Area.
- 2.11. In retail policy terms, the site is out-of-centre, as it is located over 300m from a defined centre/Primary Shopping Area. The nearest Centre is Wick Village Centre (around 1.1km to the south-east). Littlehampton Town Centre is around 1.6km to the south-west.

Relevant Planning History

- 2.12. The planning history of the site and wider Business Park is extensive relating both to the original development and subsequent operational developments linked to tenant requirements. The base planning permission for the site is outline planning permission (“OPP”) Ref: LU/234/87, dated 13th November 1987 and the associated Reserved Matters (Refs: LU/392/89, LU/484/89 and LU/409-90).
- 2.13. More recently, the office building known as Unit 7 and the security gatehouse and barriers were the subject of a Prior Notification application for demolition (Ref: LU/27/25/DEM), with the Council confirming on 5 March 2025 that prior notification is not required. As noted above, demolition of this building has now commenced.
- 2.14. A formal Screening Opinion request was submitted in respect of the proposed development subject to this planning application submission, to confirm whether it is Environmental Impact Assessment (“EIA”) development or not, under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. On 20 March 2025, the Council issued its decision, confirming that the development is not EIA development (Ref: LU/35/25/EIS) (**Appendix 2**).

Pre-Application Engagement

2.15. A Statement of Community Involvement, prepared by Cratus, is submitted with this application and provides an overview of all pre-application engagement undertaken to date. A summary is provided below.

Pre-Application Engagement with Arun District Council

2.16. The site and proposed development have been the subject of three stages of pre-application discussions with the Council. The first stage of the process first sought to establish the acceptability of the principle of a variety of proposed potential uses (Ref: PAA/101/23), which at the time included either retail warehousing (food and/or non-food) (Class E); or industrial and storage and distribution (Class E.G.III, B2 & B8); or residential (Class C3) uses (letter dated 8th December 2023).

2.17. The second pre-application submission (Ref: [REDACTED]) sought to cover the detailed development management considerations associated with delivering a retail (food and non-food), leisure and food & beverage scheme (Class E) on the site (letter dated 18th October 2024), along with the scope of the Retail Assessment (email dated 17th January 2025). In summary, the advice was as follows:

- **Loss of employment floorspace:** To satisfy Policy EMP DM1, marketing of the site should be for a minimum of 1 year, and it is agreed this has been achieved. Marketing should however continue up to the point of submission of an application, and the marketing should remain flexible i.e. on an all enquiries basis. To confirm, in line with this advice, marketing has ceased upon submission of this planning application.
- **Retail Assessment:** Retail development would be subject to formal testing by a sequential assessment and retail impact assessment. The former Waitrose store in Littlehampton should

be addressed in sequential terms, along with Land at Patterson Wilson Road and the site of the Windmill theatre. A number of other edge of centre sites should also be considered (i.e. Land at North Littlehampton; Land at Water Lane, Angmering; Land west of Brook Lane and South of A259, Angmering; Land at Arundel Road). It is agreed that sites SD4, SD8 and SD10 can be discounted.

The scope of the Retail Assessment is agreed, along with the proposed study area and household survey questions.

- **Design:** The conversion of Units 5 & 6 makes an efficient use of the land and conforms with sustainable design objectives. The loss of Unit 7 is seen as a detriment to the site's identity, with the proposed replacement buildings being out of character.
- **Residential Amenity:** The proposals will not have an overbearing effect or overshadow neighbours. Existing amenity planting and landscaping should be retained where possible.
- **Drainage and Flooding:** A sequential test is required due to the potential for surface water flooding. This should follow the same area as the retail sequential test.
- **Biodiversity and Ecology:** A 10% biodiversity net gain is required. At a minimum, a Preliminary Ecological Appraisal should be submitted with any application. A shadow Habitat Regulations Assessment ("HRA") should also be provided.
- **Parking:** Parking provision should be justified in accordance with the Arun Parking Standards Supplementary Planning Document. Any under provision should be addressed through a Transport Assessment and Travel Plan.
- **Trees:** As many trees should be retained as possible.

- 2.18. A meeting was then held with Council officers on 14th November 2024 to discuss and clarify the feedback provided.

- 2.19. A third pre-application submission was made on 18th February 2025 to present an updated scheme layout and draft landscape masterplan.

Member's Briefing Presentation

- 2.20. A Member's briefing presentation was held virtually on 17th February 2025. At this briefing, the project team presented an overview of the proposed development and this was followed by a question-and-answer session.
- 2.21. A number of questions were received, including questions in relation to the impact on Littlehampton town centre; accessibility of the site; parking; sustainability considerations; and the cumulative effect of an additional crossing on the A259.

Community Consultation Event

- 2.22. A community consultation event was held on Saturday 8th March 2025 between 10am-2pm at the Littlehampton Academy, Fitzalan Road, Littlehampton, BN17 6FE. This was advertised by way of a leaflet drop to c.1,800 local residents. Local Councillors were also notified of the event by email. A dedicated website was also provided, along with a 'GiveMyView' survey.
- 2.23. Approximately 40 – 50 people attended the in-person event, and 37 feedback forms were completed. Almost 3,000 people completed the online 'GiveMyView' survey.
- 2.24. Overall, the responses received were generally positive, with around 9 in 10 people either supporting or strongly supporting Hallway's proposals, with 87% of respondents likely to visit the new food stores and retailers once they are open.

Littlehampton Town Council Presentation

2.25. On 24th March 2025, the scheme was presented to Littlehampton Town Council (in-person). Again, at this briefing, the project team presented an overview of the proposed development, and this was followed by a question and answer session.

Summary

2.26. Overall, the Applicant and design team has sought to address the comments received, where appropriate, through the scheme evolution prior to the submission of the planning application. How the scheme has responded to the comments received is discussed in Section 5 of this Statement.

3. THE PROPOSED DEVELOPMENT

Background

- 3.1. The proposed development is explained in full in the accompanying Design & Access Statement (“DAS”) and the associated architectural scheme drawings. This section will briefly summarise that information with reference to the other details submitted with this planning application.
- 3.2. The proposed development represents a significant opportunity to comprehensively redevelop a long-standing previously developed site via the construction of a scheme that will generate a series of economic benefits and encourage investment and job creation in the Littlehampton area.
- 3.3. The scheme is intended to deliver a new retail, leisure and food & beverage development to serve the Littlehampton urban area and surrounding settlements. The Proposed Development represents an important opportunity to redevelop a vacant previously developed site in an accessible urban location. The scheme has been formulated to revitalise and energise the site introducing new retailers and businesses to provide greater choice and convenience for the residents of Littlehampton and the wider area.
- 3.4. The proposed development will be brought forward in a single comprehensive phase (should planning permission be granted) and once completed will be known as Watersmead Retail Park. Each of the scheme components is described in detail below.
- 3.5. To note, Unit 7 (i.e. the former Body Shop headquarters) is being demolished to facilitate the proposed development, as a first enabling phase. The demolition of Unit 7 forms part of the earlier Prior Notification of demolition application referred to above, and demolition is currently underway.

Retail Units

- 3.6. The proposed development comprises the part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of 9 units for retail (food and non-food), leisure and food & beverage uses (Use Classes E(a), E(b) and E(d)), together with associated car parking, access, loading areas and landscaping.
- 3.7. The new buildings will be within Use Class E and will sell a range of food/non-food goods plus food and beverage for consumption on and off the premises and also include a leisure use for a gym.
- 3.8. The unit mix and floorspace is outlined in **Table 2** below.

Table 2: Proposed Development Floorspace

Unit No.	Proposed Use	Land Use	Proposed Floorspace (Ground Floor) (sqm, GIA)	Mezzanine Allowance (sqm, GIA)	Total Floorspace (sqm, GIA)
A1	Non-food and food (up to 30%)	E(a)	1,722	200	1,922
A2	Food	E(a)	2,414	492	2,906
A3	Food & Beverage	E(b)	140	0	140
A4	Non-food	E(a)	929	0	929
A5	Food	E(a)	2,066	0	2,066
A6	Non-food	E(a)	1,020	1,020	2,040
A7	Non-food	E(a)	1,027	0	1,027
A8	Non-food	E(a)	508	500	1,008
A9	Gym	E(d)	507	0	507
-	Plant Area	Ancillary	270	0	270
Total		-	10,653	2,212	12,815

Source: RGP Architects

- 3.9. Lidl has provided a supporting statement for the Proposed Development which is at **Appendix 3** of this Statement.
- 3.10. There is the potential for the amalgamation of Units A6-A9 to provide a non-food and DIY/Bulky goods and Gym scenario, with a minimum unit size of 929 sqm. This scheme layout is presented in Section 3 of the DAS. Whilst planning permission is not sought for this scenario as part of this planning application, the Retail Assessment (Freeths LLP, May 2025) submitted with this application, provides an assessment of this potential configuration for completeness.
- 3.11. The proposed development will be operational 7 days a week, and given the existing use of the site does not have any restrictions on hours of operation or servicing. The same approach is proposed here with the acceptability of this from a noise/amenity perspective discussed in Section 5 of this Statement.

Layout

- 3.12. The proposal comprises the part demolition, conversion, refurbishment and re-elevation of the two existing large-format warehouse units (Units 5 & 6), together with new-build infill elements, and replacement of the outdated office accommodation (Unit 7) with high-quality public realm and parking.
- 3.13. The proposed layout has been developed to optimise functionality, accessibility and user experience while respecting the site's structural legacy and constraints. The proposed retail units are arranged in a terrace that supports clear legibility, operational efficiency and visibility from Norway Lane.
- 3.14. Public realm enhancements are also proposed to celebrate the site's history and contribute to its future sustainability objectives. In this respect, a History Trail will be incorporated within the landscaped areas, providing subtle references to the site's former use as The Body Shop Headquarters. This may include interpretive features such as paving

markers, signage, or small sculptural elements to acknowledge the site's industrial and ecological heritage. The details of this scheme can be the subject of a suitably worded pre-commencement condition.

- 3.15. A Bug Hotel will also be delivered as part of the site's biodiversity strategy, creating microhabitats for insects and pollinators. This aligns with the wider landscape and ecology proposals, supporting Biodiversity Net Gain and enhancing the environmental value of the public spaces. This can also be secured via a suitably worded pre-commencement condition. Together, these features help to connect the site's legacy with its future role as a modern, sustainable retail environment, contributing positively to both cultural and ecological placemaking.

Scale and Appearance

- 3.16. As the proposed development comprises the part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 to create 9 units, the scale of the proposed development will reflect that of the existing units (5 & 6), including an existing height of 6.5 metres to haunch.
- 3.17. The proposed layout, mass and mix of retail and leisure uses, combined with the provision of public realm will create an active environment and a stronger sense of place for visitors than the existing site. The proposal is based on high quality design principles, responding to the site's history while providing a visually coherent and appealing retail environment.
- 3.18. A restrained palette of light pastel colours is proposed across the primary elevations, complemented by green accent tones that reference the site's former association with The Body Shop.
- 3.19. Overall, the scale and appearance will provide an acceptable solution for the site and, importantly, an enhancement to this previously developed and vacant site.

Access / Parking / Highway Works

3.20. The proposed development includes the creation of a network of pedestrian routes through the new car park and these will be planted with trees and shrubbery to create pleasant 'green' connections through the site. Existing pedestrian, cycle and public transport links connect the site to the wider residential area, and as part of the proposed development a new pedestrian crossing is proposed on the A259 to the east. This is proposed to be secured via an off-site condition as it falls within operational highway land.

3.21. The site has also been designed to provide sufficient car, motorcycle and cycle parking to ensure demand can be accommodated and to enable vehicles to circulate the site and access spaces with ease. A total of car parking 420no. spaces are proposed across the whole site, broken down as follows:

- Standard bays: 331 (of which 62 will have passive electric vehicle provision)
- Accessible bays: 32
- Parent and child bays: 28
- Electric vehicle bays: 20 (as above, there will also be 62 passive bays)
- Staff parking: 9
- Motorcycle parking: 12
- Cycle parking: 70

3.22. Servicing of the units is proposed to be undertaken from a service yard located to the rear off Norway Lane. The Applicant has access rights to access this service yard.

Landscaping

3.23. The proposed development includes a comprehensive and complementary landscaping scheme. The landscaping strategy has been developed to enhance both the visual quality and ecological

function of the site. It forms an integral part of the overall design approach, contributing to a greener, more welcoming environment that supports biodiversity, improves user experience and reflects local character.

- 3.24. The combination of hedgerow, shrub and grass planting will soften key areas of the scheme. The provision of new / replacement trees in appropriate locations throughout will also provide further landscape interest on the site and in the immediate locality. A Green Infrastructure Strategy Plan has been prepared by FPCR and accompanies this application, providing further details of the landscaping proposed.

Sustainability

- 3.25. The proposed development will play a role in reducing carbon emissions and improving building sustainability. As set out in the Low Zero Carbon and Sustainability Statement, prepared by ITD which accompanies this application, all levels of the energy hierarchy have been considered, taking into account the nature, scale and location of the development.
- 3.26. The development proposes a significant refurbishment of both the fabric of the buildings, improving the thermal properties of the units, and the mechanical and electrical services provided to the units. The development will also incorporate photovoltaic panels, which will be suitably sized to comply with Part L of the Building Regulations, and air source heat pumps, along with elective vehicle charging points, and cycle parking in order to promote greener travel.

4. PLANNING POLICY

- 4.1. This section considers the relevant planning policy framework for the development proposed. It considers relevant national planning policy, together with policies contained within the Statutory Development Plan and other local planning policy guidance.

The Development Plan

- 4.2. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that all planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. In this respect, the Development Plan comprises the Arun District Council Local Plan (2018) and the Littlehampton Neighbourhood Plan (2014).

- 4.3. The adopted Proposals Map confirms the site is subject to the following:

- Not subject to any specific allocations or designations.
- Located within the Built-Up Area boundary of Littlehampton.
- North-eastern corner to the immediate east of Unit 6 lies in a Biodiversity Opportunity Area (“BOA”).

- 4.4. The adopted Proposals Map also confirms the surrounding designations:

- To the south east of the site is the Littlehampton Cemetery which is designated open space.
- The road to the south west is listed under Policy TSP3 (h) as the A259 Fitzalan Link - Body Shop roundabout improvement.

- 4.5. The adopted policies which are of relevance for determining the acceptability of the proposed development at this site are as follows:

Arun District Council Local Plan (2018)

- Policy SD SP1: Sustainable Development

- Policy SD SP1a: Strategic Approach
- Policy SD SP2: Built-up Area Boundary
- Policy EMP SP1: Strategic Economic Growth
- Policy EMP DM1: Employment Land: Development Management
- Policy SKILLS SP1: Employment and Skills
- Policy RET SP1: Hierarchy of Town Centres
- Policy RET DM1: Retail Development
- Policy D SP1: Design
- Policy D DM1: Aspects of Form and Design Quality
- Policy ECC SP1: Adapting to Climate Change
- Policy ECC SP2: Energy and Climate Change Mitigation
- Policy T SP1: Transport and Development
- Policy T DM1: Sustainable Travel and Public Rights of Way
- Policy T SP3: Safeguarding the Main Road Network
- Policy ENV SP1: Natural Environment
- Policy ENV DM3: Biodiversity Opportunity Areas
- Policy ENV DM4: Protection of Trees
- Policy ENV DM5: Development and Biodiversity
- Policy W SP1: Water
- Policy W DM1: Water Supply and Quality
- Policy W DM2: Flood Risk
- Policy W DM3: Sustainable Urban Drainage Systems
- Policy WM DM1: Waste Management
- Policy QE SP1: Quality of the Environment
- Policy QE DM1: Noise Pollution
- Policy QE DM2: Light Pollution
- Policy QE DM3: Air Pollution
- Policy QE DM4: Contaminated Land
- Policy INF SP1: Infrastructure Provision and Implementation

Littlehampton Neighbourhood Plan (2014)

- Policy 1: The Presumption in Favour of Sustainable Development

- Policy 2: A Spatial Plan for the Town
- Policy 9: Local Centres
- Policy 11: Littlehampton Leisure Centre
- Policy 12: The Windmill
- Policy 22: Design of New Development

Local Plan Review

- 4.6. In 2021 and 2022, work was paused on a Local Plan review, however on 19th July 2023, Full Council agreed to resume work on the Local Plan review. The Council consulted on a Direction of Travel Document (Issues and Options - Regulation 18) between March and May 2024. There is no published timetable in respect of the next stages.
- 4.7. The Plan is in the very early stages of preparation and so can be given very little weight at this time.

Supplementary Planning Guidance

- 4.8. The Council has adopted Supplementary Planning Documents (“SPD”), which although not part of the Development Plan, are material considerations in the decision-making process. These include the following:
- Arun District Design Guide SPD (February 2024)
 - Arun District Parking Standards SPD (January 2020)

National Planning Policy Framework (December 2024)

- 4.9. The National Planning Policy Framework (“NPPF”) was published in December 2024 and subject to a minor revision in February 2025. The NPPF sets out the Government’s planning policies for England and how these are expected to be applied.

- 4.10. The NPPF emphasises the role of the Development Plan in decision making (see paragraphs 2 and 12) but also states that the NPPF itself is a material consideration in the determination of planning applications.
- 4.11. The NPPF is underpinned by a presumption in favour of sustainable development. The Proposed Development represents sustainable development in line with the three dimensions identified by the NPPF (see paragraph 8) on the following basis:
- **Economic:** The new units will make a significant contribution towards local economic growth in Littlehampton. This is through a range of measures including reversing a failing site which is vacant and has no reasonable prospect of being re-used or redeveloped for industrial or office use. The scheme will introduce a range of new multiple operators to Littlehampton and support expansion of an existing retailer. This will provide improved convenience and accessibility in this part of Littlehampton and the town's offer overall. The scheme is expected to generate 250 retail industry jobs in Littlehampton and spin-off opportunities for the local supply chain.
 - **Social:** Once occupied and settled, the new units will create full and part time job opportunities directed towards the local community. The scheme will also enhance the food and non-food retail offer in Littlehampton to the benefit of the local community.
 - **Environmental:** The Proposed Development represents the re-use of a vacant, brownfield site in a sustainable location. The Site is accessible by cycling, walking and public transport. This will be enhanced particularly by cycle and on-foot with improved pedestrian accessibility from the south across the A259 via the proposed pedestrian crossing. The environmental qualities of the Site will be enhanced through a range of new and retained landscape features and on/off-site biodiversity net gain measures.

- 4.12. On this basis, if the Proposed Development can be demonstrated as being in accordance with the Development Plan it should be approved without delay consistent with paragraph 11 of the NPPF.
- 4.13. The key provisions of the NPPF of relevance are listed below.

Chapter 2: Achieving sustainable development

- Paragraph 7 – purpose of the planning system
- Paragraph 8 – achieving sustainable development
- Paragraph 10 – presumption in favour of sustainable development
- Paragraph 11 – application of the presumption in favour of sustainable development

Chapter 4: Decision-making

- Paragraph 48 – applications determined in accordance with the development plan
- Paragraph 55 – use of conditions
- Paragraph 57 – imposition of conditions
- Paragraph 58 – planning obligations

Chapter 6: Building a strong, competitive economy

- Paragraph 85 – supporting economic growth
- Paragraph 86 – economic vision and strategy

Chapter 7: Ensuring the vitality of town centres

- Paragraph 91 – application of the sequential test
- Paragraph 92 – consideration of sequentially preferable sites
- Paragraph 94 – application for the impact test
- Paragraph 95 – failure of the sequential and/or impact tests

Chapter 8: Promoting healthy and safe communities

- Paragraph 96 - creating healthy, inclusive and safe places and buildings

- Paragraph 98 – providing social, recreational and cultural facilities

Chapter 9: Promoting sustainable transport

- Paragraph 110 – development in sustainable locations
- Paragraph 115 – assessing sites for development
- Paragraph 116 – highway grounds for refusal
- Paragraph 117 – highway/transport considerations for developments

Chapter 11: Making effective use of land

- Paragraph 124 – making effective use of land
- Paragraph 125 – requirements for planning decisions to facilitate effective use of land

Chapter 12: Achieving well-designed places

- Paragraph 131 – creation of high quality and sustainable buildings and places
- Paragraph 135 – design requirements of planning policies and decisions
- Paragraph 139 – when applications should be refused on design grounds
- Paragraph 140 – use of conditions to control design
- Paragraph 141 – advertisements

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

- Paragraph 164 – design of development for climate change
- Paragraph 182 – incorporation of sustainable drainage systems

Chapter 15: Conserving and enhancing the natural environment

- Paragraph 187 – contribution and enhancement of local environment
- Paragraph 192 – protecting and enhancing biodiversity and geodiversity

- Paragraph 193 – principles for determining planning applications
- Paragraph 198 – ensuring new development is appropriate for its location

National Planning Practice Guidance

4.14. The National Planning Practice Guidance (“PPG”) is a web-based resource which was launched in 2014, and together with the NPPF sets out what the Government expects from Local Planning Authorities. The PPG specifically adds further context and more detailed practical guidance to the NPPF, and it is intended that the two are read together.

Conclusion

4.15. From this, we consider the following matters to be key policy considerations for the Site and Proposed Development:

- Principle of Development, primarily:
 - (i) Loss of Employment;
 - (ii) Retail Policy: Sequential Test; and
 - (iii) Retail Policy: Impact Test.
- Design Considerations;
- Noise and Residential Amenity;
- Ecology and Biodiversity Net Gain;
- Arboriculture and Landscaping;
- Highways and Accessibility;
- Air Quality;
- Flood Risk and Drainage;
- Energy and Sustainability;
- Ground Conditions; and
- Planning Obligations and Conditions.

4.16. Our assessment is outlined in Section 5 of this Statement.

5. PLANNING ASSESSMENT

5.1. This Section deals with the planning merits of the application, appraising the proposed development against the requirements of the Development Plan and other material considerations. The key considerations in this respect are as follows:

- Principle of Development, primarily:
 - (i) Loss of Employment;
 - (ii) Retail Policy: Sequential Test; and
 - (iii) Retail Policy: Impact Test.
- Design Considerations;
- Noise and Residential Amenity;
- Ecology and Biodiversity Net Gain;
- Arboriculture and Landscaping;
- Highways and Accessibility;
- Air Quality;
- Flood Risk and Drainage;
- Energy and Sustainability;
- Ground Conditions; and
- Planning Obligations and Conditions.

5.2. Each consideration is addressed in turn below.

Principle of Development

Loss of Employment Floorspace

5.3. Local Plan Policy EMP DM1 (Employment Land: Development Management) seeks to enhance and protect existing employment land. The starting point is therefore that existing employment sites and premises will be protected where there remains a reasonable prospect of employment use. Alternative uses will not be permitted unless it can be demonstrated that:

- a) The site is no longer required and is unlikely to be re-used or re-developed for industrial/commercial purposes. This should include clear demonstration of marketing, viability appraisal and the suitability of the site to accommodate the proposed use - using a methodology to be agreed by the District Council at pre-application advice stage; or
 - b) The existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved.
- 5.4. Further, the policy states that the Council will require evidence that the site has not been made deliberately unviable, that marketing has been actively conducted for a reasonable period of time, and that alternative employment uses have been fully explored. As noted in the initial pre-application advice, the Council considers a 'reasonable period of time' to be 'at least 6 months, preferably a year, given the importance of this site'.
- 5.5. In order to demonstrate compliance with criterion (a), a summary of marketing activity, prepared by DTRE/SHW, is enclosed with this application submission. As is demonstrated, marketing of the site commenced in March 2023 for rental re-occupation. Over this 24 month period, there has been very limited interest received, and the summary note provides an explanation as to why the interested parties did not proceed. The marketing also did not identify any interest in redevelopment of the site for employment purposes.
- 5.6. Marketing of the site continued up to the point of submission of this application on an 'all enquiries' basis in line with the Council's pre-application advice.
- 5.7. Given the site's profile, it is our view that such interest would have emerged if it existed. Given this, the marketing undertaken to date demonstrates that there is no reasonable prospect of re-use of the site for employment purposes, in line with the requirements of Policy EMP DM1 criterion a). This also exceeds the requirements as it has been undertaken for 24+ months, beyond the 6-12 months recommended.

- 5.8. It is noted that Policy EMP DM1 criterion a) also includes a requirement for a viability appraisal to be prepared to demonstrate that the site is no longer required and is unlikely to be re-used or re-developed for industrial/commercial purposes. It was agreed with the Council through pre-application discussions that a specific viability appraisal is not required in this instance, as the marketing evidence clearly indicates the lack of interest for redevelopment of the site for employment purposes to demonstrate no reasonable prospect of re-use for employment purposes.
- 5.9. On this basis, the marketing undertaken to date is adequate in demonstrating there is no reasonable prospect of re-use of the site for employment purposes, in line with the requirements of Policy EMP DM1. The requirements of this policy have therefore been met.
- 5.10. Based on compliance with Policy EMP DM1, the proposed development also complies with NPPF paragraph 128. The scheme has been formulated to meet a specific development need identified by Hallway to re-utilise this vacant previously developed site and fulfil a retail market demand for new units by national operators. A positive approach can therefore be taken to this application for alternative use, subject to compliance with the Development Plan and other material considerations.

Retail Policy – Sequential and Impact Tests

- 5.11. As the site is out of centre in retail terms, the principle of the proposed development also needs to be justified against the NPPF sequential and impact tests, together with demonstrating how the site is accessible, in accordance with Local Plan Policy RET DM1 and Chapter 7 of the NPPF.
- 5.12. A Retail Assessment (Freeths LLP, May 2025) is submitted with this application. With respect to the sequential test, the Retail Assessment demonstrates that there are no sequentially preferable sites which could accommodate the proposed development either in or on the edge of

Littlehampton Town Centre, Rustington Town Centres or any Local Centres. This has been undertaken based on a flexible approach to scale and format as required by Policy RET DM1 and the NPPF. There are also no more accessible suitable and available out-of-centre sites which are well connected to a Centre. Accordingly, the Proposed Development complies with the sequential test.

- 5.13. With respect to the impact test, the Retail Assessment demonstrates that the proposed development will have no significant adverse impact on existing, committed and planned public / private investment in Littlehampton Town Centre and other defined Centres in the Littlehampton/Rustington area. There is also no evidence that the proposed development will have a significant adverse impact on Littlehampton Town Centre and other policy protected locations in the Littlehampton/Rustington area.
- 5.14. The proposed development is therefore acceptable in retail terms, in accordance with Policy RET DM1 (Retail Development) and Chapter 7 of the NPPF.

Conclusion

- 5.15. Overall, the site is currently an under-utilised economic resource, being brownfield land and having been vacant since late 2024. The anticipated economic, social and environmental benefits of the scheme are set out later in this Statement. These benefits are significant, particularly the likely employment creation, and will ensure the site can now make a positive and beneficial contribution to the local economy.
- 5.16. As concluded above, the marketing undertaken has demonstrated that there is no reasonable prospect of re-use of the site for employment purposes, in line with the requirements of Policy EMP DM1. A positive approach can therefore be taken in line with NPPF paragraph 127. The Retail Assessment has demonstrated that there are no sequentially preferable sites for the proposed development and that the proposed development will not have a significant adverse impact on existing or

future investment in defined Centres, in line with Policy RET DM1 (Retail Development) and Chapter 7 of the NPPF. As such, the principle of development, of this vacant brownfield site, is acceptable.

Design Considerations

- 5.17. Both the NPPF and Development Plan outline clear policy expectations relating to the approach to design/layout and how a scheme should be high-quality, sympathetic to local character and maintain a sense of place. The design process and qualities of the proposed development are outlined in the submitted Design & Access Statement (RGP, April 2025).
- 5.18. The proposed development will promote the efficient use of a previously developed site, comprising the part demolition, conversion, refurbishment and re-elevation of the two existing large-format warehouse units (Units 5 & 6), together with new-build infill elements, and replacement of the outdated office accommodation (Unit 7) with high-quality public realm and parking. This takes advantage of the existing position of the industrial units, service yard and car parking/access to optimise and enhance this previously developed site.
- 5.19. The proposed layout has been developed to optimise functionality, accessibility and user experience while respecting the site's structural legacy and constraints. The proposed retail units are arranged in a terrace that supports clear legibility, operational efficiency and visibility from Norway Lane.
- 5.20. Public realm enhancements are also proposed to celebrate the site's history and contribute to its future sustainability objectives. In this respect, a History Trail will be incorporated within the landscaped areas, providing subtle references to the site's former use as The Body Shop Headquarters. This may include interpretive features such as paving markers, signage, or small sculptural elements to acknowledge the site's industrial and ecological heritage. The details of this scheme can be the subject of a suitably worded pre-commencement condition.

- 5.21. A Bug Hotel will also be delivered as part of the site's biodiversity strategy, creating microhabitats for insects and pollinators. This aligns with the wider landscape and ecology proposals, supporting Biodiversity Net Gain and enhancing the environmental value of the public spaces. This can also be secured via a suitably worded pre-commencement condition. Together, these features help to connect the site's legacy with its future role as a modern, sustainable retail environment, contributing positively to both cultural and ecological placemaking.
- 5.22. In terms of appearance, the proposed layout, mass and mix of retail and leisure uses, combined with the provision of public realm will create an active environment and a stronger sense of place for visitors than the existing site. The proposal is based on high quality design principles, responding to the site's history while providing a visually coherent and appealing retail environment.
- 5.23. A restrained palette of light pastel colours is proposed across the primary elevations, complemented by green accent tones that reference the site's former association with The Body Shop.
- 5.24. Overall, it is considered that the design, layout and scale will provide an acceptable solution for the site and, importantly, an enhancement to this previously developed and currently vacant site, in accordance with Local Plan Policies D SP1 (Design) D DM1 (Aspects of Form and Design Quality), QE SP1 (Quality of the Environment), Neighbourhood Plan Policy 22 (Design of New Development), the Arun District Design Guide SPD (2024) and Chapter 12 of the NPPF.

Noise and Residential Amenity

- 5.25. There are existing residential dwellings on the opposite side of Norway Lane, immediately to the west of the site. The proposed development will not have an overbearing or overshadowing effect on these neighbouring dwellings given the proposed development comprises the part demolition/re-use/elevation of existing units and results in a scheme

of the same height. This was a position agreed with the Council through pre-application discussions.

5.26. The proposed development will be operational 7 days a week, and given the existing commercial use of the site does not have any restrictions on hours of operation or servicing, the same approach is proposed here. As such, with respect to noise considerations, a Noise Impact Assessment, prepared by Sharps Redmore, accompanies this application. A baseline noise survey was undertaken in January 2025 (when the site was vacant) to inform the assessment, and the assessment confirms the following:

- Fixed mechanical plant (including refrigeration plant) will be designed to ensure that there is no overall increase in existing background noise levels at the nearest noise sensitive receptors;
- Noise from car parking will be well below the recommended daytime and night time WHO Guidelines, and also well below existing noise levels measure on site. The site can therefore trade with no restrictions on operational hours without causing adverse impact to local residents; and
- Having regard to the guidance in BS:4142 and contextual considerations (including the extant use of site and adjacent warehouse building), the impact of noise from servicing activity will be no greater than current unrestricted use of the site. Therefore, it is concluded that the proposed site could receive deliveries at any time without causing a significant adverse impact to local residents.

5.27. Overall, therefore, the proposed development is acceptable in noise and residential amenity terms, in accordance with Local Plan Policy QE DM1 (Noise Pollution) and paragraph 198 of the NPPF.

Ecology and Biodiversity Net Gain

5.28. Due to the site's existing landscape characteristics and proximity to designated sites and a BOA, an Ecological Appraisal has been undertaken by FPCR. This confirms the following:

- **Statutory Designated Sites:** The proposals are not anticipated to lead to any significant negative effects on any of the internationally or nationally designated sites within the search area. Although there are two waterbodies present on site these are not considered to be of a size that would support any significant population of bird species that the statutory sites are designated for.
- **Non-Statutory Designated Sites:** There are no non-statutory sites within 1km of the site boundary. The proposals will have no significant impact on sites outside of this search area.
- **Bats:** No bats were recorded roosting onsite and therefore do not pose a constraint to the proposals. Shrubs, ornamental hedgerows and a limited number of trees on site provide very limited suitability for foraging and commuting bats and their loss is similarly not considered to pose a constraint to the proposals. To mitigate for changes to the parking area altering the lighting onsite, which could reduce the suitability of the site for some bat species, a sensitive lighting scheme will be implemented to reduce light spill. Bat boxes will be installed at various southerly aspects on retained trees to further increase the roosting opportunities onsite.
- **Birds:** The hedgerows, mixed scrub and introduced shrub provide habitat for breeding birds. Any removal of woody vegetation will take place outside of the bird breeding season. New planting will include some native species to replace those specimens lost and provide foraging opportunities with berry-producing species. A variety of bird boxes will be installed on

retained trees to further increase the nesting opportunities onsite.

- **Reptiles:** Desk search returned a single record of slow worm in 2022 within the habitat adjacent to the onsite ponds (P1 & P2). This habitat was limited in extent and suitability due to the managed nature of the site and surrounding urban environs. The remaining grassland was heavily managed and did not provide suitable reptile habitat. The grassland around P1 and P2 will be retained, but to facilitate the removal of any surrounding landscaping a precautionary approach will be applied to this area, where reptiles will be assumed present and any habitat clearance will be undertaken via passive displacement exercise, under supervision of an ecologist.
- **Badgers and Hedgehogs:** Given the urban landscape that the site is situated within there is some (albeit limited) potential for the Site to support these species. To avoid any harm to these species, precautionary working measures will be implemented during the construction phase of works.

- 5.29. There are no specific policy implications/requirements arising from the site's proximity to a BOA.
- 5.30. The Council through its pre-application advice, initially highlighted that the site's proximity to the Arun Valley SPA IRZ triggers the requirement for a shadow Habitat Regulations Assessment ("sHRA") to be provided as part of the planning application. However, following FPCR's review of this request, the Council subsequently confirmed, in conjunction with the Council's Ecological Officer, that this is not required in this instance and can be scoped out (email dated 7 March 2025).
- 5.31. In respect of biodiversity net gain ("BNG"), in line with Local Plan Policy ENV DM5 and the NPPF, the proposed development will need to achieve the mandatory 10% net gain in biodiversity which will need to be secured as part of this planning application. In this respect, the

application is also accompanied by a BNG Assessment, prepared by FPCR. This confirms that the proposed development will result in a net loss of 2.14 habitat units, mainly due to the loss of individual trees. While significant new tree planting is proposed on-site, this in itself will not be able to compensate for the loss completely. As such, off-site biodiversity units will be sought in respect of the residual deficit. The delivery of these off-site habitat units will be secured through the mandatory BNG condition imposed by the Environment Act 2021.

- 5.32. Based on the above, the proposed development is acceptable in ecological and BNG terms, in accordance with Local Plan Policies ENV SP1 (Natural Environment), ENV DM3 (Biodiversity Opportunity Areas) and ENV DM5 (Development and Biodiversity), and paragraph 187 of the NPPF.

Arboriculture and Landscaping

- 5.33. Local Plan Policy DM4 relates to the protection of trees and requires new development to be designed to have a comprehensive approach to trees, ensuring negative impacts are negated. The Council through pre-application discussions recommended that the design of parking areas should take a comprehensive approach to allow the retention of as many trees as possible.
- 5.34. This application is accompanied by an Arboricultural Impact Assessment, prepared by FPCR. This confirms that there are 70 individual trees, 14 groups of trees and 2 hedgerows within the site; all of which are either Category B or C (with 1 Category U tree).
- 5.35. In designing the final scheme, tree loss has been minimised wherever possible, with the scheme designed by the Applicant's architect in conjunction with the landscape consultant (FPCR). In order to facilitate the proposed development, a total of 59 trees, small patches of amenity grassland between parking spaces, mixed scrub and introduced scrub will require removal. The scheme proposes new tree planting (with 55 new trees proposed) and landscaping including amenity grassland and shrub together with targeted future management.

5.36. In respect of the proposed landscaping, a Green Infrastructure Strategy Plan, prepared by FPCR, accompanies this application submission and sets out the proposed landscaping scheme for the site. The strategy for the landscaping of the site includes the following:

- An enhancement to both the visual quality and ecological function of the site.
- The creation of a greener, more welcoming environment that supports biodiversity, improves user experience, and reflects local character.
- The use of Specimen Tree Planting, Native Hedgerow Planting, Ornamental Planting, Amenity Grassland and Bulb Planting to soften key areas of the scheme.
- The provision of new / replacement trees (55 individual trees) in appropriate locations throughout to provide further landscape interest on the site and in the immediate locality.

5.37. Overall, the landscaping and new tree planting will ensure that the site is an attractive and pleasant environment and will complement the existing landscaping/trees within the site.

5.38. Based on the above, the proposed development is acceptable in arboricultural and landscaping terms, in accordance with Local Plan Policies DM4 (Protection of Trees) and QE SP1 (Quality of the Environment) and paragraph 136 of the NPPF.

Highways and Accessibility

5.39. A Transport Assessment has been prepared by Connect Consultants and accompanies this application. The Statement provides details of the site context, including its accessibility by relevant transport modes, describes the site access arrangements and parking provision and provides an assessment of the vehicular attraction and trip generation

of the proposed development and its traffic effects. The key conclusions are as follows:

- The site is surrounded by a pedestrian network that includes a number of crossing facilities and a residential catchment within walking distance. This will be improved by the proposed crossing over the A259.
- The local area to the site is conducive to cycling, and there are good opportunities for customers and staff to make their journeys by cycle.
- The bus stops local to the site are served by frequent bus services, which provide access to and from a variety of destinations. Littlehampton rail station is within cycling distance to support long journeys and wider connections.
- The site also has a prominent location relative to the local highway network.
- The recent local collision records indicate that there is no existing road safety problem in the vicinity of the site.
- Overall, the site has a good level of accessibility by all relevant transport modes in line with the proposed development's vision.
- Pedestrian movements will be accommodated within the internal site layout.
- Swept path analysis shows that the access arrangements and layout of the proposed development are suitable for the largest vehicles that are expected to use the site.
- A parking assessment has been undertaken and demonstrates that the proposed provision is sufficient to meet the anticipated demand.

- The vehicle trip assessment shows that the potential increase to traffic will be negligible at all other junctions within the agreed study area.
 - The capacity and safety assessments show that the Body Shop Roundabout will operate within capacity and safely for all peak periods.
- 5.40. A Travel Plan has also been prepared by Connect Consultants and accompanies this application. The objective of the Travel Plan is to publicise and promote the use of sustainable and low emission travel modes amongst the future staff members. This will be achieved through the implementation of a set of measures, as set out in the Travel Plan.
- 5.41. Overall, it is therefore clear that the proposed development is acceptable in highway terms, in accordance with Local Plan Policies T SP1 (Transport and Development), DM1 (Sustainable Travel and Public Rights of Way) and T SP3 (Safeguarding the Main Road Network), the Arun District Parking Standards SPD (January 2020) and Chapter 9 of the NPPF. The scale of residual impact cannot be considered severe against NPPF paragraph 116.

Air Quality

- 5.42. An Air Quality Assessment, prepared by TRC, accompanies this application. It confirms that a review of local monitoring data and Defra background pollutant concentrations demonstrates that none of the relevant pollutant NAQOs are likely to be exceeded across the site and in the surrounding area, with annual mean NO₂, PM₁₀ and PM_{2.5} concentrations well below their respective objective values. As such, the site is considered suitable for the proposed development with respect to air quality.
- 5.43. The assessment of construction phase impacts associated with emissions of fugitive dust and fine particulate matter (PM) with an

aerodynamic diameter of less than 10 and 2.5 microns (PM10 and PM2.5, respectively), has been undertaken in line with the relevant Institute of Air Quality Management (IAQM) guidance. This identified that there is a medium risk of dust soiling impacts, and a low risk of increases in PM concentrations, due to unmitigated construction activities. However, through good site practice and the implementation of suitable mitigation measures, the effect of dust and PM releases would be significantly reduced. The residual effects of the construction phase on air quality at nearby sensitive receptors are considered to be 'not significant'.

- 5.44. In accordance with the assessment criteria and the proposed scale of the site's operation, the possibility of significant effects arising on local air quality is screened out. As such, the impact of operational phase road vehicle emissions would result in a negligible impact at nearby receptors, and no significant effects on air quality are anticipated at these locations.
- 5.45. The residual effect on air quality as a result of the proposed development is not significant, in line with EPUK and IAQM assessment criteria. As such, in accordance with the assessment criteria, additional mitigation is not required during the operation of the proposed development.
- 5.46. As such, the proposed development is acceptable in air quality terms, in accordance with Local Plan Policy QE DM3 (Air Pollution) and paragraph 199 of the NPPF.

Flood Risk and Drainage

- 5.47. The site is located in Flood Zone 1 (i.e. at low risk of flooding). There are however localised pockets of surface water flood risk within the site ranging from low to high risk.
- 5.48. This application is accompanied by a Flood Risk and Drainage Assessment Report, prepared by Pinnacle. This confirms that the site has two existing fully operational, primary, positive surface water

networks, with separate discharge locations at an existing lake situated circa. 20m-50m to the northeast of the site. The use of ground infiltration methods on site is considered a very low viability option for the discharge of surface water runoff. The additional increase in the impermeable areas and consequent net increase on the runoff rate is therefore to be accommodated by the existing attenuation/ storage capacity of the lake.

- 5.49. A hydraulic assessment of the combined piped external site drainage network developed for this site demonstrates that the existing site drainage network has sufficient capacity to accommodate a design storm of 1 in 1-year up to the 1 in 30-year storm events + 40% climate change allowance. However, the existing network, when subjected to a simulation and loaded with a storm event of 100-year + 45% climate change allowance, does not possess adequate capacity to deal with a storm event of this scale. As such, it is proposed to upgrade/upsized some sections of the existing site drainage in order to accommodate the storm event of 100-year + 45% climate change allowance and therefore eliminate any risk of site flooding.
- 5.50. With respect to foul flows, this will be discharged into the public foul water sewers via an existing Southern Water adopted foul pumping station that is located to the south east side of the site. Due to the demolition of Unit 7, it is anticipated that there will be a general net reduction in the foul discharges into the existing foul pumping station.
- 5.51. Overall, therefore the proposed development is acceptable in drainage terms. The sequential test from a flood risk perspective is addressed below.

Sequential Assessment

- 5.52. The site has localised pockets of surface water flood risk, ranging from a low – medium – high risk yearly chance of flooding, both now and between 2040 and 2060. As confirmed through pre-application discussions, a sequential assessment is required to demonstrate that the scheme is an appropriate location for the type of development

compared to alternatives with respect to flood risk/surface water flooding.

- 5.53. The NPPG Paragraph: 027 (Reference ID: 7-027-20220825) provides advice as to application of the sequential test to individual planning applications. It confirms that the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies.
- 5.54. With respect to suitability considerations, a site must be reasonably available in order to be considered suitable. As set out in Paragraph: 028 (Reference ID: 7-028-20220825) of the NPPG, reasonably available sites are 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.
- 5.55. Through pre-application discussions, the Council has confirmed that the catchment area for the flood risk sequential test should logically cover the same scope/area as the retail sequential test, as unless the retail sequential test is also satisfied, the flood risk sequential test cannot also be satisfied – and therefore the site would not be a suitable location. This is in accordance with the guidance contained in the NPPG, which requires sites to be in a suitable location for the type of development proposed. The flood risk sequential test has therefore been carried out on this basis, and this includes both in centre, edge of centre and out of centre sites identified by the Council.
- 5.56. The sites identified and assessed in the retail sequential assessment (see the Retail Assessment) are set out in the table below, along with the respective flood risk classification and risk of surface water flooding.
- 5.57. To note, the 27 vacant shop units in and on the edge of Littlehampton Town Centre, and 5 vacant shop units in and on the edge of Rustington Town Centre are not assessed any further from a flood risk sequential perspective given there are no units that are larger than the smallest

retail units in the proposed development and the proposed food & beverage unit (which is smaller than some of the vacant units) cannot be disaggregated from the proposed development as it fulfils an amenity role in support of the wider scheme.

Table 3: Sequential Sites / Flood & Surface Water Flooding Risk

Site	Flood Zone	Surface Water Flooding	
		Yearly chance of flooding	Yearly chance of flooding 2040-2060
Former Waitrose store, Avon Road, Littlehampton.	1, 2 and 3	Low	Medium
North Littlehampton / Hampton Park Masterplan Local Centre	1 - directly adjacent to areas of Flood Zone 3	Predominantly very low, with small areas of low-high	Predominantly very low, with small areas of low-high
The Windmill, Coastguard Road, Littlehampton	3	Medium - high	Medium - high
Land at Paterson Wilson Road, Littlehampton	1, 2 and 3	Very low, with a small area of medium-high at the hardstanding located south of the Police Station	Very low, with a small area of medium-high at the hardstanding located south of the Police Station
Land west of Brook Lane and South of A259, Angmering	1	Predominantly very low, with small areas of low-high	Predominantly very low, with small areas of low-high
Land North of Water Lane, Angmering	1	Very low	Very low

Land at Arundel Road, Angmering	1	Very low	Very low
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- 5.58. From an assessment of these sites from a retail sequential test perspective, there are no appropriate sequentially preferable opportunities within or on the edge of Littlehampton Town Centre, Rustington Local Service Centre or any other locations were identified. There are also no accessible out-of-centre locations that are well connected, which could be considered sequentially preferable. Full details of why the sites do not satisfy the retail sequential test are set out in the accompanying Retail Assessment.
- 5.59. While Land North of Water Lane, Angmering and Land at Arundel Road, Angmering, are in Flood Zone 1 and are at a very low risk of surface water flooding, these sites cannot logically satisfy the requirements of the flood risk sequential test for the reasons explained above.
- 5.60. As such, following a proportionate approach to the assessment, the flood risk sequential assessment therefore demonstrates that there are no reasonably available sites appropriate for the development proposed.
- 5.61. Overall, based on the above, the proposed development is acceptable in flood risk and drainage terms, in accordance with Local Plan Policies W SP1 (Water), W DM1 (Water Supply and Quality), W DM2 (Flood Risk) and W DM3 (Sustainable Urban Drainage Systems) and Chapter 14 of the NPPF.

Energy and Sustainability

- 5.62. In order to demonstrate compliance with Local Plan Policies ECC SP1 and ECC SP2 and Chapter K of the Design Guide SPD, a Low Zero Carbon and Sustainability Statement, prepared by ITD, accompanies this application. This confirms that all levels of the energy hierarchy have been considered, taking into account the nature, scale and location of the development.

- 5.63. The development proposes a significant refurbishment of both the fabric of the buildings, improving the thermal properties of the units, and the mechanical and electrical services provided to the units. The development will also incorporate photovoltaic panels, which will be suitably sized to comply with Part L of the Building Regulations, and air source heat pumps, along with elective vehicle charging points, and cycle parking in order to promote greener travel. The development will provide a minimum of 10% of the development's energy usage via renewable energy sources, in line with policy requirements.
- 5.64. In addition, wherever possible, materials from the demolished office building (Unit 7) will be reused within the new scheme, reducing waste and making use of the site's existing resources.
- 5.65. Overall, therefore, the proposed development is acceptable in energy and sustainability terms, in accordance with Local Plan Policies ECC SP1 (Adapting to Climate Change) and ECC SP2 (Energy and Climate Change Mitigation), Chapter K of the Design Guide SPD and paragraph 164 of the NPPF.

Ground Conditions

- 5.66. A Shorthand Geotechnical Report was prepared by Delta Simons in 2019 and is submitted with this application. Pinnacle has also provided a summary of the findings of this 2019 report which is appended to the start of the Delta Simons report. This confirms the conditions of the site and does not identify any adverse characteristics.
- 5.67. The proposed development is acceptable in terms of ground conditions, in accordance with Local Plan Policy QE DM4 (Contaminated Land) and paragraph 196 of the NPPF.

S106 Heads of Terms

- 5.68. Based on the findings of this Statement, and in accordance with Local Plan Policy INF SP1 (Infrastructure Provision and Implementation) the

Development will need to be the subject of appropriate Planning Obligations where measures cannot be secured by planning condition.

5.69. Without prejudice to any final decision, the following requirements have been identified to date through pre-application discussions with the Council and/or our assessment of the proposed development:

- Off-site highway improvements and works;
- Off-site BNG (unless it the Council agrees it can be secured via planning condition); and
- Town Centre improvements contribution.

5.70. We would welcome a further discussion with the Council on these requirements once their assessment of the proposed development is completed.

Scheme Benefits and Conclusion

5.71. The proposed development represents an important opportunity to redevelop a vacant brownfield site in an accessible location. The proposed development is known as 'Watersmead Retail Park' and is intended to deliver new retail units to serve the Littlehampton area. Once complete, the scheme is expected to deliver the following benefits:

- Important inward investment into the Littlehampton economy reversing a failing site, which has no reasonable prospect of being re-used or redeveloped for industrial or office use.
- Re-use of a vacant, brownfield site in a sustainable location.
- Provision of an enhanced and inviting commercial environment to reverse decline following vacancy.
- Introduction of a range of new multiple retailers and operators to Littlehampton. The decision to progress a retail scheme is

based on retailers wanting to be both in Littlehampton and this site specifically compared to potential alternatives.

- Supporting expansion of existing retailers in the town.
- Improve convenience and accessibility in this part of Littlehampton and the town's offer overall including new fascias to make a key qualitative difference.
- New non-food retailers to the town to improve local access to key retail sectors and reduce loss of trade to surrounding areas and on-line shopping.
- Creation of circa 250 retail industry jobs in Littlehampton and spin-off opportunities for the local supply chain.
- Improved pedestrian accessibility for residents from the south across the A259.
- New planting and biodiversity net gain through on and off-site measures.

5.72. Overall, the proposed development is compliant with the relevant Development Plan policies in terms of the following:

- The site is currently an under-utilised economic resource, being brownfield land and having been vacant since late 2024. The marketing undertaken since March 2023 has demonstrated that there is no reasonable prospect of re-use of the site for employment purposes, in line with the requirements of Policy EMP DM1.
- The site is an appropriate out-of-centre location as it has been demonstrated the proposed development complies with the retail sequential test and flood risk sequential test in accordance with Policy RET DM1 (Retail Development) and Chapter 7 of the NPPF.

- The scale and type of goods sold are entirely appropriate as there will be no 'significant adverse' impact on the vitality and viability of nearby centres including Littlehampton and Rustington. There will also be no impact on any form of in-centre investment. This accords with Policy RET DM1 (Retail Development) and Chapter 7 of the NPPF.
- The proposed development will be accessible by sustainable methods of transport, and able to integrate with the surrounding highway network. On and off-site highway improvements are proposed. The proposed development is therefore in accordance with Local Plan Policies T SP1 (Transport and Development), DM1 (Sustainable Travel and Public Rights of Way) and T SP3 (Safeguarding the Main Road Network), the Arun District Parking Standards SPD (January 2020) and Chapter 9 of the NPPF.
- The proposed development achieves a high level of design quality, landscape improvements and an appropriate relationship with residential amenity in accordance with Local Plan Policies D SP1 (Design) D DM1 (Aspects of Form and Design Quality), QE SP1 (Quality of the Environment), Neighbourhood Plan Policy 22 (Design of New Development), the Arun District Design Guide SPD (2024) and Chapter 12 of the NPPF.
- The proposed development is acceptable in respect of all other technical considerations, including drainage, ecology/BNG, arboriculture, ground conditions, noise, air quality and sustainability, in accordance with Local Plan Policies W SP1 (Water), W DM1 (Water Supply and Quality), W DM2 (Flood Risk), W DM3 (Sustainable Urban Drainage Systems), DM4 (Protection of Trees), QE SP1 (Quality of the Environment), ENV SP1 (Natural Environment), ENV DM3 (Biodiversity Opportunity Areas), ENV DM5 (Development and Biodiversity), QE DM1 (Noise Pollution), QE DM3 (Air Pollution), QE DM4

(Contaminated Land), ECC SP1 (Adapting to Climate Change) and ECC SP2 (Energy and Climate Change Mitigation), along with the Design Guide SPD and the NPPF.

- 5.73. Overall, the benefits of the proposed development are substantial. As the proposed development constitutes sustainable development for the purposes of the NPPF, the application should be approved.

6. SUMMARY AND CONCLUSIONS

- 6.1. This Planning Statement has been prepared by Freeths LLP on behalf of Hallway Properties Limited in support of an application for full planning permission for the proposed redevelopment of Land at Norway Lane, Littlehampton, West Sussex, BN17 6LS to provide a retail (food and non-food), leisure and food & beverage scheme (Class E).
- 6.2. The site is currently an under-utilised economic resource, being brownfield land and having been vacant since late 2024. The anticipated economic, social and environmental benefits of the scheme are significant, particularly the likely employment creation, and will ensure the site can now make a positive and beneficial contribution to the local economy. The scheme will provide high quality, sustainable development delivering 9no. retail/leisure units, complementing Littlehampton's existing retail offer.
- 6.3. The marketing undertaken since March 2023 has demonstrated that there is no reasonable prospect of re-use of the site for employment purposes, in line with the requirements of Policy EMP DM1. The Retail Assessment has demonstrated that there are no sequentially preferable sites for the proposed development and that the proposed development will not have a significant adverse impact on existing or future investment in defined Centres. The principle of development, of this vacant brownfield site, is therefore acceptable.
- 6.4. The proposed development is also acceptable in design terms and from a technical point of view in terms of the range of Development Plan requirements and material considerations. Overall, the proposed development is compliant with the relevant Development Plan policies
- 6.5. The benefits of the proposed development are substantial. As the proposed development constitutes sustainable development for the purposes of the NPPF, the application should be approved.

Awards and accreditations



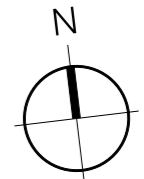
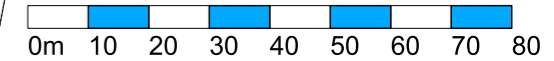
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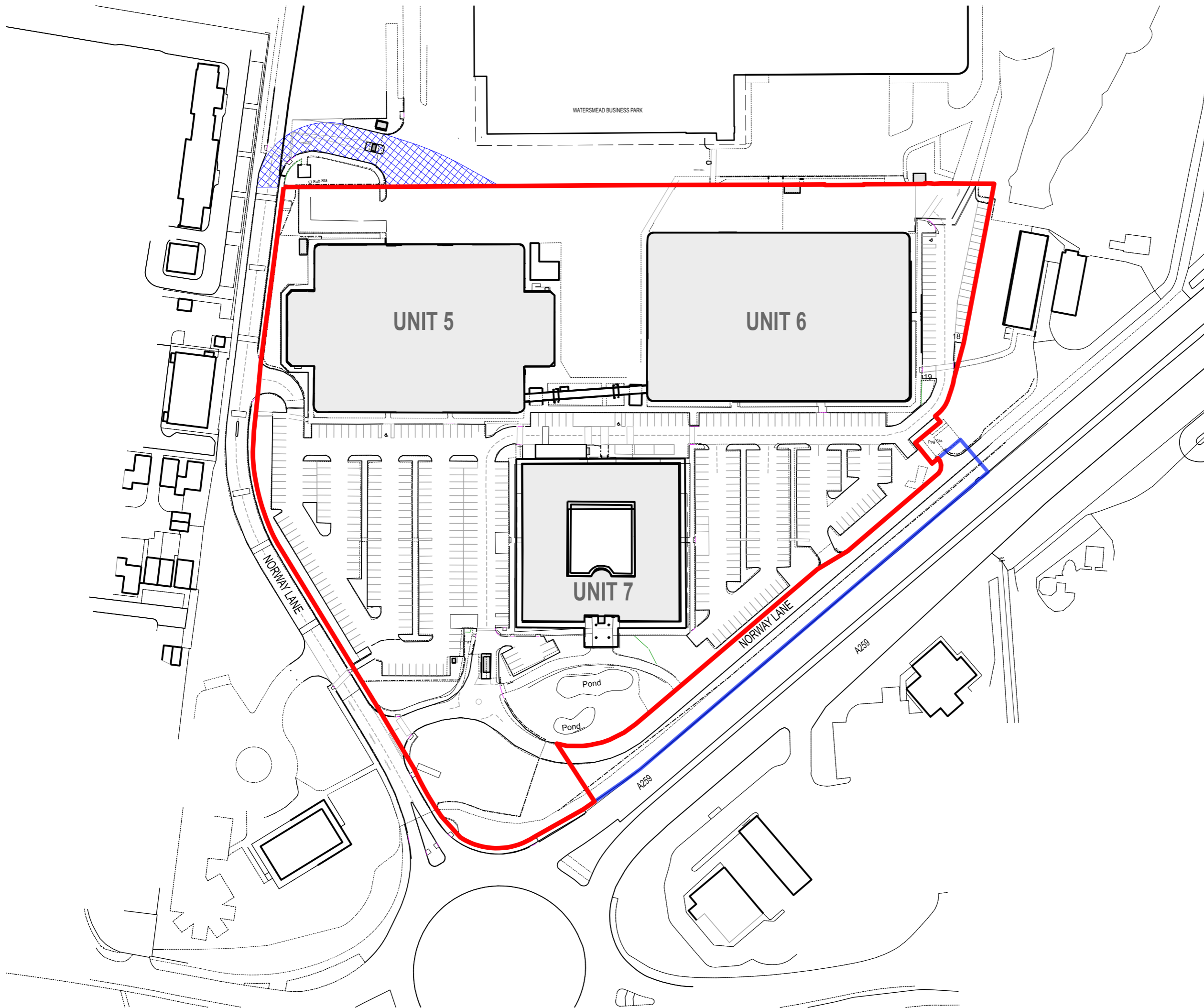
SITE SPECIFIC HAZARDS

IN ACCORDANCE WITH THE REQUIREMENTS OF THE CDM REGULATIONS 2015 THE FOLLOWING SIGNIFICANT RESIDUAL HAZARDS HAVE NOT BEEN DESIGNED OUT OF THIS PROJECT AND MUST BE TAKEN INTO CONSIDERATION BY CONTRACTORS PLANNING TO UNDERTAKE THE WORKS SHOWN ON THIS DRAWING:

SCALE 1:1250



- OWNERSHIP BOUNDARY
- PLANNING BOUNDARY (4.0 HECTARES)
- BLUE HATCHING DENOTES SHARED ACCESS



A	27/03/25	PLANNING ISSUE	AM
REV.	DATE	NOTES	INIT.

CLIENT / PROJECT
HALLWAY PROPERTIES LIMITED
LAND AT NORWAY LANE
LITTLEHAMPTON

DRAWING TITLE
SITE LOCATION PLAN

STATUS
PLANNING

DATE	DRAWN	SCALE @ A3
13/02/25	EDD	1:1250

PROJECT NUMBER	UNIT / BLOCK	CI / SFB CODE	TYPE & NUMBER	REVISION LETTER
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DRAWING NO.	11631	PL101	A
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Site Location Plans	L	GA Plans	P	Elevations	E
Sections	S	Details	D	Prefix Colour	C

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LITTLEHAMPTON, WATERSMEAD BUSINESS PARK 1525623 P:\0001100011600-116991116311-Sheets\6-PLANNING-10011631-PL101.dgn emanuel.dfmuccd



Arun District Council
Arun Civic Centre
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Littlehampton
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Freeths LLP
Cumberland Court
80 Mount Street
Nottingham
NG1 6HH

Date: 20th March 2025

Please ask for: Kathryn Welch

Tel: 01903 737789

Your Ref:

Our Ref: LU/35/25/ESO

Dear Sir/Madam,

Environmental screening opinion in respect of redevelopment for retail, leisure and food and beverage uses.

Units 5-7 Watersmead Business Park Norway Lane/Worthing Road Littlehampton BN17 6LS

Screening Opinion

The Group Head of Planning has determined under delegated powers that the above proposal does not require the submission of an Environmental Statement, as any impacts as there are on the environment are not likely to be of a magnitude to be covered by the Regulations. The following environmental issues are considered relevant to this proposal and have been considered in reaching this decision:

The Council considers that the proposal is an "Urban Development Project" as defined within Section 10(b) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Regarding the Schedule 2 relevant criteria and thresholds, it is noted that the proposed development is expected to have a maximum floor area of 12,000 sqm, plus 878 sqm of yard/service area. The proposed development therefore exceeds the relevant threshold of 1 hectare.

According to paragraph 032 (Reference ID: 4-032-20170728) of the Planning Practice Guidance (NPPG), all developments in sensitive areas should also be screened, regardless of whether they meet the stated thresholds. The NPPG states that sensitive areas are:

- Sites of Special Scientific Interest and European Sites.
- National Parks, the Broads, and Areas of Outstanding Natural Beauty.
- World Heritage Sites and scheduled monuments.

The NPPG also states that "In certain cases, local designations which are not included in the definition of 'sensitive areas,' but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required."

The very edge of the northeast corner of the site is found within the outer buffer of the Arun Valley Impact Risk Zone (IRZ2), which is a 500m buffer beyond Zone 1 and is where functionally linked habitat is likely present and the loss of such could impact on over-wintering bird populations. The presence of this designation may necessitate a Habitats Regulation Assessment by the competent authority. However, in terms of EIA and sensitivity, it is important to note that the site lies within the urban area with residential development, a major highway (A259), and commercial development surrounding the site. The site is not affected by any other potentially sensitive areas.

Paragraph 017 (Reference ID: 4-017-20170728) of the NPPG states that "If a proposed project is listed in the first column in Schedule 2 of the 2017 Regulations and exceeds the relevant thresholds or criteria set out in the second column, the proposal needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and, hence, whether an Environmental Impact Assessment is required."

The redevelopment of the commercial warehouses for an 'urban development project' is a Schedule 2 development, where an EIA is not automatically required unless the local planning authority considers that the proposed development is also likely to have significant effects on the environment.

In addition, it is noted that paragraph 018 (Reference ID: 4-018-20170728) states: "To aid local planning authorities in determining whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria has been produced. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development."

However, it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits."

The indicative threshold to determine the significance of potential impacts for 'Urban Development Projects' states that where redevelopment will not have a significantly greater scale than the previous use, or the types of impact will not be markedly different in nature, or where there will not be a high level of contamination, then an Environmental Impact Assessment is unlikely to be required. Key issues to consider would be the physical scale of development, its potential to increase traffic, emissions, and noise.

The NPPG states that the thresholds should only be used in conjunction with the general guidance on determining whether an Environmental Impact Assessment is required, and, in particular, the guidance on environmentally sensitive areas. In this case, the urban development project falls below the indicative threshold set out in Schedule 3 as the proposal is to redevelop the site rather than developing a brand-new parcel of land and is not in an environmentally sensitive location. Notwithstanding, this Screening Response now continues in response to the headings given within Schedule 3.

Schedule 3 of the Regulations outlines the criteria to consider in determining whether development falling within Schedule 2 will require an EIA. These criteria include (1) the characteristics of the development (e.g., its size, design, cumulative impact along with other developments, use of natural resources); (2) the environmental sensitivity of the location; and (3) the characteristics of the potential impact (e.g., its magnitude and duration).

(1) Characteristics of the Development

The site consists of two vacant industrial warehouses and a vacant purpose-built office block (3 storeys), along with associated parking, loading and service areas, and amenity landscaping. The existing floorspace of the buildings is 19,739 sqm, and the proposed development is expected to have a maximum floorspace of 12,000 sqm, plus an 878 sqm yard/garden centre area. As a result of the demolition of the office building, there will be a reduction in the scale of built development on site. The development is expected to result in 30 fewer parking spaces as well. The site is urban in character with little to no areas of natural vegetation.

There are no firm details on the scale of the proposed units but given that the works to units 5 and 6 (warehouses) will consist of conversion, refurbishment, and re-elevation of the buildings, their proposed scale is expected to be reflective of the existing site situation.

In terms of use, the existing development was previously used as office and distribution warehouses, originally built for use by The Bodyshop some 30 years ago. Given it is proposed to convert part of the site into retail outlets, it is not considered that the change in use from light industrial/office to commercial will materially alter the character of the site.

Trip generation arising from the development is expected to exceed the existing use. However, it is expected that many trips will be made by those passing by the site or visiting in combination with other local destinations. The development will provide enhanced pedestrian and cycle infrastructure to encourage sustainable modes of transportation to the site.

Various amenity planting can be found along the boundaries of the site and within landscaped areas that break up the car parking. None of the landscaping/existing trees found on-site are significant and works to/ the loss of some of the landscaping can be controlled during the planning application. Specific improvements can be controlled via a S106 agreement or conditions and will not pose significant environmental impacts.

The proposed development is not expected to involve large amounts of earthworks that would alter the topography of the site, nor is the development on a site which contains any important natural resources (sand, gravel, etc.), such that development would sterilize the site. The refurbishment of the existing buildings will not result in the loss of natural resources.

The development will produce waste predominantly through the construction phases, especially through the demolition of the office building. The office building is located over 100m away from the nearest residential building in an area surrounded by car parking, and although there is some noise/dust expected from the demolition, this is not expected to be significant, and the duration of the demolition of a single building will not be excessive. No other significant waste or pollution, over and above what might be typically expected, or could be controlled via further surveys/planning conditions, from the refurbishment of this site is expected.

In terms of the indicative thresholds set out in the NPPG, the proposed development results in a development of a lesser scale. No evidence of contamination or designations which indicate the site's sensitivity to such is found, other than those impacts such as noise and dust, which can be reasonably expected (and controlled by planning condition) from such works.

In summary, the characteristics of the development are not likely to be significant in the context of the EIA regulations.

(2) Location of the Development

The site is in the Built-up Area Boundary, to the northeast of Littlehampton Town Centre, and is urban in character. The site is surrounded by residential development to the west, the A259 to the south and southeast, and another larger warehouse forming part of the retained business park to the north, with the West Coastway Railway Line beyond.

The site consists primarily of hardstanding (parking areas) with amenity planting, including urban trees interspersed. Surrounding the site, the landscaping buffers are larger and consist of mature trees and hedges. There is a small pond to the southern part of the site.

As previously developed land, the site is not in an area of best and most versatile agricultural land, nor is there any evidence it has ever been categorised as such. There are no nationally, or locally designated heritage assets affected, and it is unlikely that the site contains any significant archaeological features, given it is previously developed land.

The site is wholly within Flood Zone 1, which indicates a low probability of flooding from fluvial sources (1 in 100 annual probability of flooding). There are small areas of surface water flooding (1:1000), however, these could be accommodated through sustainable drainage systems and layout considerations as part of a planning application.

The proposed site does not benefit from being within a National Landscape or a National Park. However, the South Downs National Park lies to the north of the site, the closest point being approximately 2km to the north. Aside from the Arun Valley IRZ, the site is not affected by any wildlife designations, although the site itself may provide some wildlife habitat.

Overall, this is not an environmentally sensitive site. Any environmental impacts that may arise are likely to be localized in nature.

(3) Characteristics of the Potential Impacts

The characteristics of the likely impacts, in general, are not such that they are particularly significant or long-lasting, nor do they affect a significant area/number of persons in the district, or that they are complex in nature.

Subject to full assessment through the planning application, it is not likely that the refurbishment of the units and subsequent commercial use will result in any significant harm to ecological interests. Despite its inclusion at the very edge of the IRZ2, no functionally linked habitat is found on this previously developed site, and any minor impacts can be mitigated through planning conditions and the approval of an appropriate layout. An ecological appraisal indicated there is some (albeit limited) habitat with the potential to support badgers, hedgehogs, and reptiles on site. Based on the results of the surveys, any required mitigation measures will be incorporated into the proposed development.

Traffic consultants have conducted highway surveys and met with West Sussex County Council regarding the proposed development. The surveys showed current traffic flows are lower than TRICS predictions, likely due to the site not being fully operational. The development is expected to generate more vehicle trips, but pedestrian and cycle links will promote sustainable transport. Mitigation measures can be addressed through the planning process, and a Travel Plan will encourage sustainable travel. Overall, the traffic impacts are not deemed significant.

The vast majority of the site is not at risk of flooding, and the development and planning process represent a potential opportunity to improve the existing surface water drainage system. Any archaeological remains can be investigated and recorded prior to construction.

It is likely that noise pollution can be appropriately controlled through suitable mitigation measures and building design/site layout. In terms of air pollution, it is noted that there are no Air Quality Management Areas in the district, and given that no general industrial uses are proposed, any pollution will be localized in nature. Similarly, a Phase 1 Ground Contamination Assessment will be carried out to discover any potential contamination onsite, with further surveys commissioned where necessary. Conditions can be used to secure Travel Plans and suitable electric vehicle charge points, which will assist with offsetting vehicle emissions.

The proposal can be accommodated with little visual impact due to the presence of existing trees. Proposals to enhance the landscaping can also be controlled via the application. As such, landscape and visual impacts will not be significant in the context of the EIA regulations.

Finally, although the construction phase of the site will result in some impacts (such as noise and dust) on the local population, these effects will be temporary and, provided suitable mitigation measures are put in place, not significant.

Cumulative Effects

NPPG paragraph 024 (Reference ID: 4-024-20140306) states with regard to cumulative effects that "There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development."

There are no approved developments in the immediate area that have been approved and would compound any adverse impacts and so result in a case for cumulative effects. It is noted that there are three other sites identified as part of the screening opinion, and only one of these sites, 'Land North of Littlehampton,' has permission for B1 (employment floorspace) and Class A (local facilities), now Class E. One is currently undetermined, and the other has yet to be submitted and, under NPPG guidance, are not required to be considered in this assessment.

When considering the application site and the site 'Land to the North of Littlehampton,' no significant environmental impacts arising from cumulative development are therefore envisaged, given that the application site is previously developed land, which has a similar character and scale to the existing development.

Whilst economic and residential growth in the district will clearly result in a change to the character of the Littlehampton area, this is to be expected, and the proposal will only be a very

small part of this change.

Conclusion

Having considered the above factors and had regard to the nature and scale of the proposal, the proposed commercial development will not have the potential to result in significant impacts on the environment. The impacts would be relatively small-scale and localised and will be mitigated in accordance with standard methods, including by conditions, a S106 legal agreement, and the Community Infrastructure Levy. As such, the proposal does not constitute EIA development, and therefore an Environmental Statement is not required in this instance.

This determination that an environmental statement is not required should not be seen as an indication of the Council's view on the planning merit of the proposal.

Yours faithfully

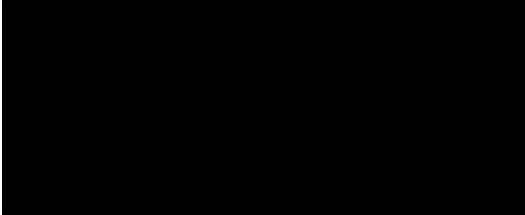


Neil Crowther
Group Head of Planning



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Lidl Great Britain Limited
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Lidl Regional Distribution Centre
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Nursling, Southampton SO16 0AW
20th June 2024



16th May 2025

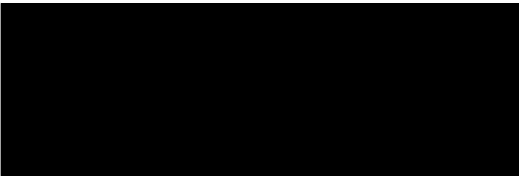
Dear Mark,

Since Lidl opened our store on New Road in Littlehampton Town Centre in 2010, we have seen a lot of support and demand from the local community. As such Lidl believes that there is sufficient demand from the local area to provide an additional Lidl store as part of the retail park scheme on Norway Lane. Lidl are a deep discount supermarket and strongly feels that a second store in the Littlehampton area would provide convenient access to quality products at the lowest possible prices for currently underserved parts of the catchment.

The Lidl strategy would be to retain our New Road store and occupy space on the proposed retail park as a second store in the town to protect the vitality of Littlehampton town centre as well as being in a very accessible location in the north of the town.

Lidl very much supports the planning application as proposed by Hallway Properties Ltd and hopes the Arun District Council would look favourably on a proposed development which will offer substantial investment into the local community, job creation and a sense of place to a site which would be considerably improved by the proposals.

Yours sincerely,
For and on behalf of Lidl Great Britain Limited,



Ollie Roberts MRICS
Senior Acquisitions Consultant

