

**From:** Nicola Oktay on behalf of Planning.Responses  
**Sent:** 08 August 2025 11:00  
**To:** Planning Scanning  
**Subject:** FW: Planning Consultation on: LU/93/25/PL

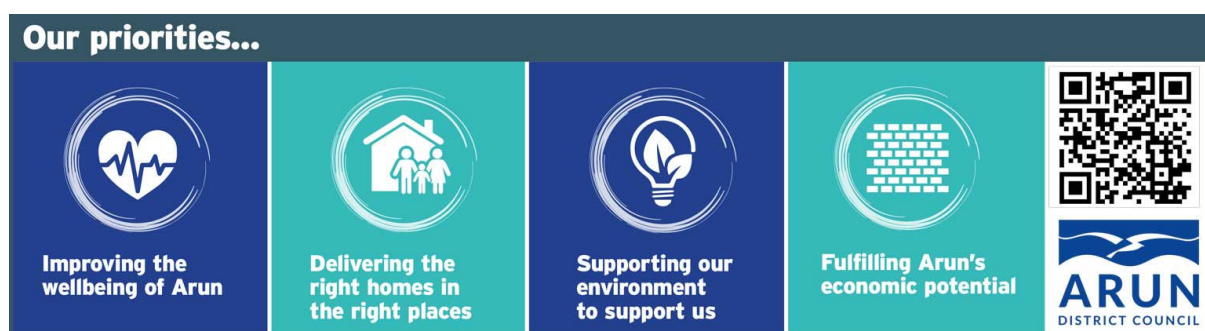
Arun Parks and Landscapes response

**Nikki Oktay**  
**Planning Receptionist, Planning Department**

**T:** 01903 737965  
**E:** Nicola.Oktay@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

To register to receive notifications of planning applications in your area please go to <https://www1.arun.gov.uk/planning-application-finder>



---

**From:** Sue Howell <Sue.Howell@arun.gov.uk>  
**Sent:** 07 August 2025 12:47  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Kathryn Welch <Kathryn.Welch@arun.gov.uk>  
**Subject:** Planning Consultation on: LU/93/25/PL

### Response to Planning Application

**From:** Arun District Council Leisure & Greenspace

**Date:** 07/08/2025

**Application ref:** LU/93/25/PL

**Description of Works:** 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. This application is in CIL Zone 2 and is

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

**Determining Authority:** Arun DC

**Summary recommendation:** Recommend no landscape objection to the details submitted under this application LU/93/25/PL subject to condition of submission of BNG appropriate proposals and full landscape detail to be submitted and approved.

---

### Comments

#### Relevant landscape designations

This proposed development site is located along the A259, Littlehampton. The main access is via Norway Lane to the south/west of the site. There is existing a good network of ancillary and network roads with vehicular or pedestrian connections between in association with the present use of the site.

The site, is approximately 4 hectares and comprises two vacant distribution warehouses (Units 5 and 6), previously occupied by Amazon, and a vacant office building (Unit 7), previously occupied by The Body Shop Headquarters.

The prominent and well known former Body Shop headquarters, Unit 7, is proposed to be demolished to facilitate the proposed development within a first enabling phase.

There are no known statutory or non-statutory landscape, heritage or biodiversity designations within the context of the site, physical, visual, historical or cultural links, protected landscapes, scheduled ancient monuments, listed buildings, conservation area or Historic Parks or Gardens associated with this site.

The South Downs National Park to the north.

## Response

This proposal is for 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. This application is in CIL Zone 2 and is CIL Liable

The Site is situated to the north-east of Littlehampton, the surrounding habitat is dominated by urban environments including residential housing to the south, east and west. In addition to a school and church with associated cemetery to the south and a new housing development to the north. There is also a large industrial unit directly to the north of the Site. Greenspace is limited, with larger extents of more semi-natural environments present including a golf course to the north of the Site

The existing buildings are detailed as being underutilised for some time following The Body Shop Headquarters' relocation and the end of Amazon's lease.

The submitted planning application Option 1, details nine retail units across a reconfigured layout to optimises parking, servicing, and pedestrian connectivity.

The removal of unit 7 is detailed to provide approximately 2,500 sqm of ground space, which is shown for external works to include high-quality public realm, enhanced carparking, landscaping and sustainable drainage infrastructure.

The landscaping strategy as detailed within the DAS is proposed to develop and enhance both the visual quality and ecological function of the site. It is stated that this will form an integral part of the overall design approach, contributing to a greener, more welcoming environment supporting biodiversity, improved user experience, and reflecting local character.

A detailed Tree Impact Assessment by FPCR has identified the removal of 63no low-quality trees and 2no hedgerows, which is detailed to be offset by the planting of 71no new trees of varied species. The indicative planting strategy includes native hedgerows, ornamental planting, and wildflower-rich grasslands, providing seasonal interest and ecological benefits. Existing mature trees and established landscaping, particularly around the site perimeter and pond area, is proposed to be retained and enhanced to reinforce green corridors and create a strong sense of arrival.

It is proposed that the site will deliver improved biodiversity outcomes, achieved through on-site habitat improvements and, where necessary, off-site contributions. An ecology survey has confirmed no protected species were present on-site, allowing enhancement measures to focus on habitat quality, pollinator support, and improved planting diversity.

Landscape improvements are proposed to be complemented by a Sustainable Urban Drainage System (SuDS), incorporating bio-retention features, swales, and permeable paving. These proposals are to mitigate surface water run-off while contributing to the site's visual character and environmental performance.

As part of wider place-making aspirations, a 'History Trail' is proposed to run through the site, within the public realm areas, offering interpretive signage that acknowledge the site's legacy. There is proposal for a bespoke 'Bug Hotel' to be located near the pond. The Bug Hotel to be delivered as part of the site's biodiversity strategy, creating microhabitats for insects and pollinators, to align with the wider landscape and ecology proposals.

It is detailed that a central focus of the design is enhancing pedestrian and cyclist connectivity. A new signalised pedestrian crossing on the A259 has been proposed, improving access from residential neighbourhoods south of the site.

Along the boundaries and the frontage triangular area within the Green Infrastructure Strategy plan (FPCR design) it is shown that Specimen existing trees located within tree groups are to be retained. Existing shrub and understorey planting is to be thinned, managed and maintained. **It should be noted that there are no detailed planting details or specification submitted within this application with details shown as indicative only.**

The landscape proposals appear to have considered the site and location and would appear sympathetic to siting. **A full landscape detail would need to be conditioned to ensure that existing vegetation is protected and retained**, that the ecological measures are implemented, boundaries are strengthened and improved to provide a robust and diverse species composition suitable for the site.

Any considered tree works would need to be in consultation with the LPA Tree Officer. There are significant trees in conjunction with this application site which would require protection and retention. **Policy ENV DM4 (ALP)** requires development proposals to be supported by tree surveys that take a comprehensive view of trees at an early stage in the design process. Development works should not have a negative impact on existing trees.

## Impact

The potential impact on the location would require that landscaping be provided as mitigation towards softening of the development. Consideration will be required re the access into the site and the existing trees and hedges on any boundaries.

The existing mature vegetation helps to integrate the development site into the location. This is predominantly deciduous and will afford more open views visible in autumn/winter. It is noted that the indicative scheme has considered additional landscaping within the reconfigured car parking areas, trees in these locations will require adequate underground support systems to allow establishment and longevity in these locations.

## Mitigation/requirements

In England, biodiversity net gain is now required under statutory frameworks introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, every grant of planning permission will be deemed to have been granted subject to a general biodiversity gain condition. This will require an objective for developments to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of all onsite habitats. This is a pre-commencement condition requiring the provision of a Biodiversity Gain Plan to be submitted and approved before works can be commenced, but after planning permission has been granted. In principle, the grant of planning permission is not within the scope of BNG, however it is important to consider as part of the consenting body's decision-making process how a scheme will be able to demonstrate BNG after permission is granted.

The biodiversity net gain Land at Norway Lane, Littlehampton – Ecological Appraisal "L:\12600\12641\ECO\Eco App\Report\12641\_Watersmead Business Park\_EcoApp v2.docx" 5 report has presented the results of a Biodiversity Net Gain assessment that has been completed in order to demonstrate how the proposals would be compliant with the requirements of the Environment Act 2021.

An existing green boundary is evident along the boundaries of this site and indicated buffer zones and further boundary planting treatment indicated. A robust and detailed landscape scheme will be required within these proposals for all areas of development to increase biodiversity net gain and habitat. Detailed landscape proposals would need to be submitted in plan form detailing species choice, quantities, planting densities and size at time of planting. Opportunities

to enhance the landscape in association with any development of the site, by implementing an ambitious soft landscape and tree planting programme would be sought. A detailed landscape scheme would need to incorporate a good selection of native tree species in conjunction with suitable ornamentals.

A DAS has been submitted, the Illustrated Green Infrastructure strategy plan 12641-FPCR-ZZ-ZZ-DR-L-0001 has provided indicative proposals which should aim to minimise the adverse impact of the development proposals on the environment and to positively respond to its context and character.

**Policy D SP1 (ALP)** requires development proposals to reflect the landscape characteristics of the site and local area.

**Policy ENV DM5 (ALP)** requires consideration to be given to increasing biodiversity net gains through utilisation of landscaping measures throughout the site. Ecology & Biodiversity Net Gain A Biodiversity Net Gain (BNG) has been submitted alongside this application. As this is a hybrid application, both phases have been accounted for individually.

#### Recommendation/Conclusion

Recommend no landscape objection to the details submitted under this application LU/93/25/PL subject to condition of submission of BNG appropriate proposals and full landscape detail to be submitted and approved.

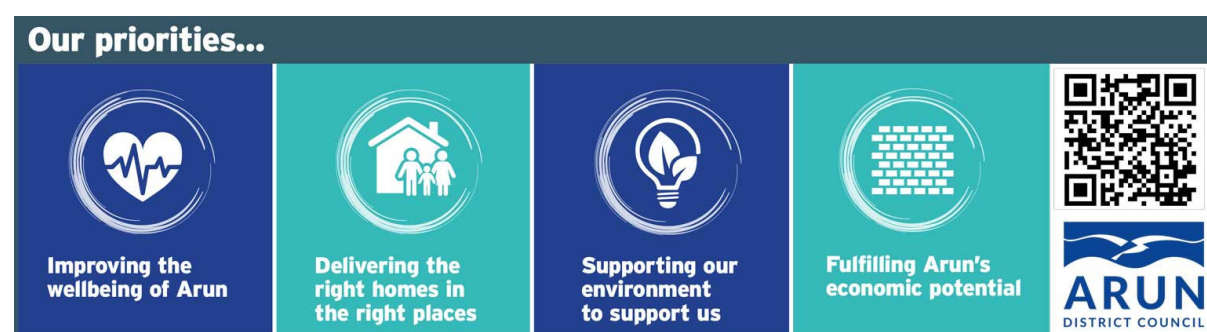
**Sue Howell**  
**Leisure and Landscape Officer**  
Environment and Climate Change

T: 01903 737943

E: [sue.howell@arun.gov.uk](mailto:sue.howell@arun.gov.uk)

Arun District Council, Bognor Regis Town Hall,  
Clarence Road, Bognor Regis, PO21 1LD

[www.arun.gov.uk](http://www.arun.gov.uk)



**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 29 May 2025 08:34

**To:** Tree Landscape <[Tree.Landscape@arun.gov.uk](mailto:Tree.Landscape@arun.gov.uk)>

**Subject:** Planning Consultation on: LU/93/25/PL

To: **Parks and Landscapes**

#### NOTIFICATION FROM ARUN DISTRICT COUNCIL

**Town & Country Planning Act 1990 (as amended)**

**Town and Country Planning (Development Management Procedure) (England) Order 2015**

#### Planning Permission

<b>Application No:</b>	LU/93/25/PL
<b>Registered:</b>	28th May 2025
<b>Site Address:</b>	Units 5-7 Watersmead Business Park Norway Lane/Worthing Road Littlehampton BN17 6LS
<b>Grid Reference:</b>	503817 103549
<b>Description of Works:</b>	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. This application is in CIL Zone 2 and is CIL Liable.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for on site mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back

of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 4th June 2025 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can information on what comments we can consider <https://www.arun.gov.uk/planning-application-comments>

**Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.**

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Kathryn Welch

Planning Officer- Arun District Council

Telephone: 01903 737789

Email: [kathryn.welch@arun.gov.uk](mailto:kathryn.welch@arun.gov.uk)

PLCONSULT (ODB) 2020