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Our ref 799  
Your ref LU/91/19/PL

13<sup>th</sup> December 2019

Dear Sir / Madam,

**Change of use of parts of seafront for temporary food and drink outlets and other seaside uses together with associated temporary / portable structures and equipment for use by businesses associated with those outlets – various sites along Littlehampton Promenade. Ref LU/91/19/PL.**

#### **General Information**

Part of the Littlehampton Seafront Public Realm Action Plan approved by the Littlehampton Regeneration Sub Committee in June 2017 and the Full Council in July 2017 was to extend the provision for temporary business pitches in the seafront area to enable seasonal businesses to locate there. Planning approval is required for any commercial outlet that is in situ for over 28 days, and this application is about planning for the future to enable Arun District Council to grasp suitable opportunities as they arise to enhance and improve the Littlehampton seafront offer for its visitors and increase footfall which will benefit all businesses located there. It is envisaged that such outlets would be in place for the busy summer season to cater for visitors to Littlehampton seafront, however it is not envisaged that all the pitches will be used immediately or indeed necessarily all at the same time. The sites would also support any large-scale events on the greens such as Food Festivals or Classic Car Shows.

The aim of this planning application is to draw in more, and higher-spending, visitors more often for the benefit of all businesses located in this area through offering a wider range and quality of eating, drinking and things to do in this location. These temporary businesses would be selected to complement existing provision rather than replicate or compete with it. The aim is to raise the quality and offer more modern and healthy food and drink options and new activities, all based in good quality temporary or tow-away units. Previously there was a very successful Gin, Prosecco and Pizza Bar on Bognor Regis seafront which drew in a new and younger clientele to visit this area. This is the sort of outlet we seek to put onto these pitches. Other alternatives are catering or activities that are not currently available such as vegan / ethnic street food or a paddleboarding operator, all of which would draw and attract both family and younger visitors.

All temporary businesses located on the proposed sites would be subject to full management and oversight by Arun District Council. Applications to locate businesses on these pitches would be fully vetted and licensed by qualified surveyors from Arun District Council's Property and Estates Department as they control all business



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use on Arun District Council land. The operating licence provides the mechanism to control many of the issues raised in objections such as rubbish, food waste etc, and would specify conditions around the extent of the site which would include space for outdoor tables and chairs or any equipment such as paddleboards, what was being sold and which days and times, and manage litter and other potential environmental issues. Breach of licence conditions can be reported to the Council and would mean the licence could be removed.

A number of issues have been raised during the course of this planning application, and these are addressed in detail below:

### **1. Loss of coach parking**

Coach trips are a contributor to the footfall in the seafront area, however ticket sales show that the Banjo Road coach park is rarely full – at most twice per year according to the ticket data. Data shows the highest ticket sales are in July and August, with total coach ticket sales for the month of July 2018 of 131, and for August 2018 of 108. Given that there are a total of 20 coach parking spaces available it is clear that this is an underused resource.

The Banjo Road coach park is a large area for seasonal businesses. It is proposed that as the site is initially marketed to businesses, that the parallel parking area near the seafront and performance venue is barriered off for use by temporary businesses, and the northern (inland) oval part of the site is retained for coach parking i.e. drop-off and pick up, turning area and parking. This is as the attached plan. This would mean there were 10 less coach parking spaces on these occasions, which ticket sales indicate should not impact the ability of coaches to use Banjo Road. To mitigate for the loss of these coach spaces, there are currently 2 coach spaces at the Wave Leisure Centre (approximately a 5 minute walk away) designed for school swimming lesson coaches that are unused at weekends, and Banjo Road would still be used to drop off and pick up. The availability of these spaces can be clearly signed on the Pay and Display machine.

In the longer term, alternative off-site coach parking will be identified for the temporary periods when the whole of Banjo Road is being used by seasonal businesses. Allocated drop-off and pick-up points will be provided close to the seafront so there will be minimum impact on visitors. Officers will investigate potentially suitable areas locally for coach parking. Coaches are not permitted to park on surrounding roads as on-road parking is allocated for cars rather than specific allocated coach parking, so this provision will be off-road.

The planning application, if approved, could be conditioned such that the herringbone coach parking section of Banjo Road cannot be used for seasonal businesses until alternative off-site provision has been identified and all plans / signage / communications etc as described above are in hand.

### **2. Competition with existing businesses**

The aim is to bring in new temporary businesses with a different offer to the existing businesses that will drive new footfall for the benefit of all businesses located on or near the seafront rather than detract from the trade and viability of existing businesses. Having more seasonal outlets would also help to cater for large-scale events on the greens.

The current sit-down catering offer is within Harbour Park or The Windmill Harvester set back from the seafront, with the East Beach Café at the far eastern end of the promenade, plus there are the take-away catering outlets in the promenade kiosks seaward of Harbour Park. This means that the bulk of the 700m long seafront promenade has no food and drink offer at all, and at the west end near the river mouth there is a predominantly standard / value offer available.

The catering and retail outlets in Pier Road are in a different catchment along the riverside with their own seating and microclimate. Seafront visitors tend to come for the beach experience and currently many choose to walk to Pier Road to eat and drink.

We believe that there is additional seasonal capacity along the 700m long stretch of seafront between the River Arun and East Beach Café for more than the existing businesses, and for higher quality and more variety of modern / healthy food and drink choices which do not compete with the existing offer. For example, this could be an outlet like the fresh pizza, gin and prosecco bar that has been so successful on Bognor Regis seafront or street and ethnic food choices. There is also capacity for new beach activities such as paddleboarding and kayaking (pending the arrival of the new Watersports Café at the eastern end of the promenade).

### **3. Visual impact, loss of current seafront experience**

We believe that two temporary business pitches with a maximum of two small single storey units along a 700m stretch of promenade would not alter the open and undeveloped character of the seafront in any meaningful way. The Banjo Road site, although larger, is set back from the beach and promenade.

All temporary business units will be licensed to operate by the Council's Property and Estates Department, and part of the prequalification will be that all business units will need to meet an acceptable quality in terms of appearance. It is not anticipated that all these proposed pitches would be in use at the same time at least initially, and possibly never. This application specifies several different sites that would be relevant to different types of outlets, so for example, a paddleboard operator would need to be close to the sea whereas a food operator might choose the larger and more sheltered location in Banjo Road to enable comfortable outdoor seating and eating.

Temporary units will be approved by Arun District Council's Property and Estates surveyors who will vet every application and issue an operating licence to the outlet. As stated above, the aim is to improve and enhance the current range and quality of the seafront offer, not to repeat or compete with existing outlets. Accordingly, units will have a good quality of appearance, be visually appealing and in keeping with the area in which they are located. This is particularly true of the "pebble seat" area (site B – concreted area to north of Littlehampton Pier) which is a key visual gateway.

### **4. Environmental impact – litter, smell etc**

Operating licences for seasonal businesses issued by Arun District Council will consider how food / drinks are served and consumed, and stipulate strict litter management and daily rubbish removal, plus regular litter picks to tidy their area. Responsible operators will want their area to be clean and tidy; in Bognor Regis the gin, pizza and prosecco operator would litter pick several times a day and worked with a local charity to do joint beach cleans, and The Coffee Cup Café on the promenade offers a free hot drink for returning a bucket full of litter on a Monday, so these operators are making the beach cleaner rather than the opposite.

In term of cooking odours, existing outlets already create such odours, and the daily sea-breeze will readily disperse any cooking odours away.

### **5. Promenade too narrow for the two proposed pitches to operate safely with other promenade traffic**

Safety has obviously been considered as part of the planning application. The proposed pitches allow the road train to operate safely up to its "white line" with a minimum gap of over 600mm from the proposed temporary businesses even in the unlikely event that the building extends to the maximum width permitted (3.5m).

The dimensions of the promenade in Littlehampton are similar (in fact slightly wider) than that in Bognor Regis, where a busy permanent coffee kiosk, The Coffee Cup, is located plus a road train, cyclists, pedestrians and other promenade “traffic”. Part of the operating licence in place for Bognor Regis demands that queues must be to the sides of the kiosk, not out across the promenade to retain the free-flow of “traffic”. There have been no safety issues with these arrangements in the 4 years that the kiosk has been in situ along Bognor Regis promenade, and this promenade is at least as busy as the one in Littlehampton and indeed in a more sustained way because of the 5,000 visitors that come to Butlin’s each week of the year.

All traffic, whether pedestrian or vehicular, travels slowly on the shared surface of the promenade, reducing the risk of collisions or accidents.

#### **6. “Junk” food and ugly mobile units**

From the objections posted, it seems that the main aims of this planning application have been misunderstood. As stated above, the intention is that any new food provision would be of a better quality, healthier, more modern and diverse offer that many families now expect to find on their days out.

The units from which the businesses are run are equally important to add to the offer. They will be vetted by the Arun District Council Property and Estates team, and must be of a good quality appearance. They would definitely not appear be “cheap and tacky” as the intention is to move to a higher quality image.

#### **7. Alcohol sales**

Alcohol is readily available on the seafront at both the East Beach Café and The Windmill Harvester, and if people are determined to drink, they will bring alcohol with them.

On Bognor Regis promenade last summer there was a very successful Gin, Prosecco and Pizza bar for the first time, and the new venue did not create any additional drunkenness or disturbance as the clientele it attracted were not the type to drink to excess and then behave badly. As with Littlehampton, there are several pubs / bars already located close to the seafront.

All alcohol sales are subject to formal licensing, and licenses are only granted to trained and competent people.

Please do not hesitate to contact us should you require any further information or if you have any questions.

Yours faithfully,



**Phil Brown**

**Director**

**Sloane and Brown Ltd**

Enc. – drawing 799-07