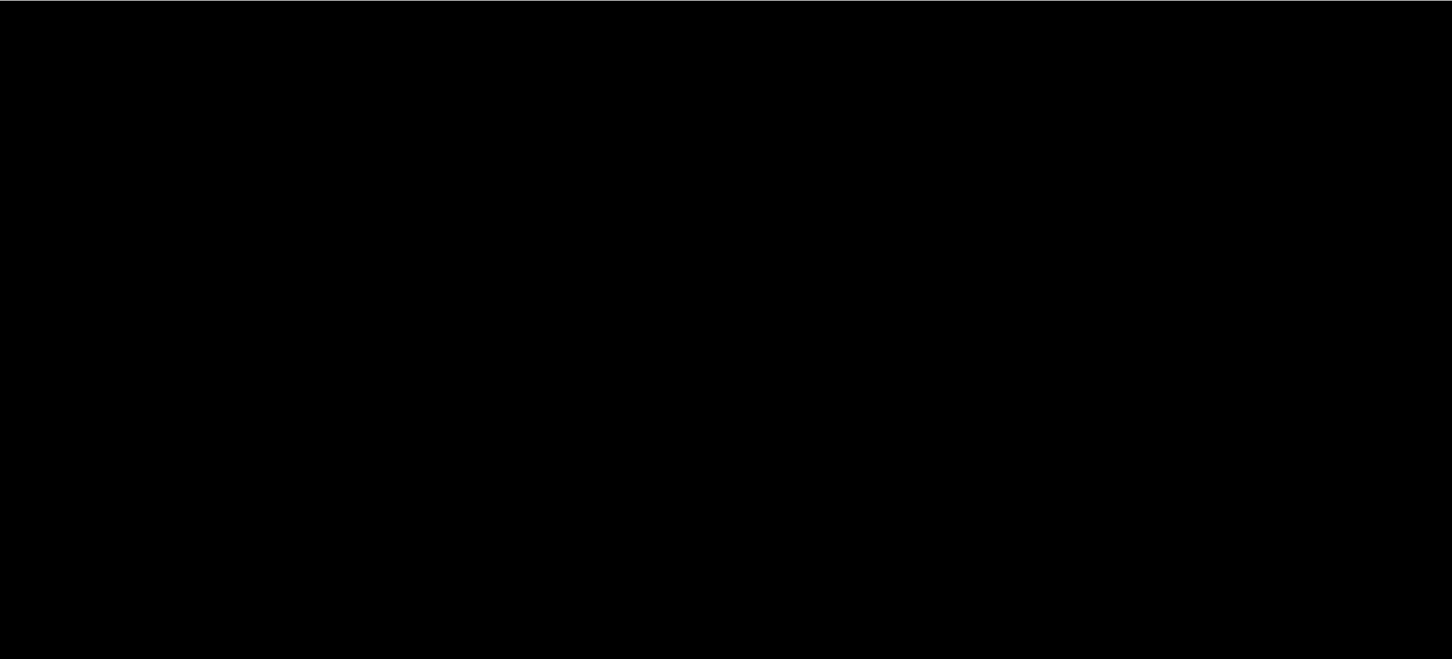




From: [REDACTED]
Sent: 07 December 2018 21:40
To: Claire Potts; Planning
Subject: Letter of Objection A/11/17/OUT
Importance: High

Claire,

Please find attached a further letter of representation to application A/11/17/OUT. We agree with your recommendation of refusal, however, as detailed in the attached letter we suggest that the reasons for refusal could be expanded.

Please do not hesitate to contact me if you have any queries.

Kind regards

Serena

Serena Page
BA MA (Cantab) MSc MRTPI
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Date: 7 December 2018
Your Ref: A/11/17/OUT
Our Ref: SP/AJC/9349B



6 New Bridge Street
London EC4V 6AB

Ms Claire Potts
Strategic Development Team
Arun District Council
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Dear Ms Potts

OBJECTION TO APPLICATION A/11/17/OUT AT LAND SOUTH OF NEW ROAD (A259) AND EAST OF BROOK, ANGMERING

We write further to our letter dated 13th July 2018 to provide further representations on the above application on behalf of Store Property Investments Limited. We understand that the application is due to be considered at Development Control Committee on 12th December 2018.

As you know from our representations submitted when application A/11/17/OUT was being presented to the Development Control Committee in May 2018 we agreed with your recommendation that the application should be refused and also agree with your recommendation to refuse the application at the 12th December committee on transport and retail grounds.

Store Property own an adjacent site where we are working to progress applications for reserved matters, discharge planning conditions and commence development that would realise a substantial number of homes, which will make a valuable contribution to Arun's housing need. Store Property also has significant land interests in the nearby town centres, and is very concerned about the impacts of the proposed development on the health of the town centres.

Since the previous application was considered at the Planning Committee in May, Arun District Council has adopted its Local Plan and we consider that the retail reasons for refusal should be expanded. Furthermore planning permission has been granted for an access off the A259 which needed to be taken into account by the current application, in order to demonstrate that the proposed access is safe when judged on a cumulative basis.

Transport

DWD has previously objected to the application on transport grounds as application A/11/17/OUT is not consistent with the consented residential/care home scheme. We have made clear that the applicant needs to demonstrate to the Planning Committee how the proposed development does not prejudice the committed development on the adjacent site. In our representations of 13th July 2018 we identified that the proposed highway design precludes access to the committed residential development and to ensure the relationship between the two developments is compatible that a revised plan would be required.

Since DWD's letter of objection was uploaded to the Council's online record, the applicant has failed to submit an updated highway access plan. More recently, West Sussex County Council (WSCC)

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provided an updated consultation response dated 21st November 2019 objecting to the development.

The WSCC response states that following Arun Development Control Committee's approval of applications A/23/15/OUT and A/83/18/RES, the applicant for application A/11/17/OUT has failed to demonstrate that they can deliver a safe access to the site whilst not prejudicing the committed development A/83/18/RES from coming forward. The WSCC response identifies that the siting of the access would impact upon the deceleration lane proposed to serve applications A/83/18/RES and A/23/15/OUT and in light of this WSCC objects to the planning application.

Retail

DWD has had a longstanding objection to the proposed development on retail grounds and has submitted representations on this issue as recently as 13th July 2018. We agree with your recommendation to refuse the application at the 12th December committee on retail grounds.

As identified in the Committee Report for application A/11/17/OUT the Arun Local Plan has been adopted and as such full weight can be given to Policies RET SP1 and RET DM1 as opposed to the substantial weight afforded in considering the proposals when the application was last considered by Members and the emerging Local Plan was under examination. In this case the applicant has failed to demonstrate that no suitable site can be found, firstly within the existing town centre or, secondly, on the edge of the centre. The vacant former Waitrose unit in Littlehampton remains both available and suitable and represents an appropriate unit that should be reoccupied as opposed to the Council approving a new out of centre retail development. Members should be reminded that proposals that fail the sequential test or are likely to have a significant adverse impact on town centre vitality or viability should be refused as explained in paragraphs 85-90 of the NPPF adopted in 2018.

However, we consider that the grounds of refusal on retail grounds should be expanded to include reference to retail impact. The application has not been supported by a full retail impact assessment. When the application was previously considered by Arun's planning consultant DPDS it was considered that one wasn't required because it fell below the NPPF threshold of 2500 sq m and Arun did not have adopted local thresholds. However, adopted policy RET DM1 states that 'impact assessment for growth of office, leisure and retail development outside of town centres will be required from a threshold of 1,000 sq m for Town Centres, Large Service Centres and the Six Villages larger centres and 200 sq m for village and suburban local centres.' The information put forward by the applicant is not a full retail impact assessment and is also considerably dated. Contrary to the Local Plan, the applicant has failed to demonstrate that the proposed development would not have a negative impact on nearby centres. In order for the applicant to demonstrate that the proposal would not have a significant adverse impact there would need to be a more up-to-date consideration of the health of Arun's centres (the applicant's health checks are almost two years old) and there would need to be an updated understanding of the performance of those centres using up-to-date household survey evidences (the current assumptions are based on surveys undertaken 5 years ago). It is impossible for Members to weight the economic benefits of the proposal against the impacts on the town centre when an assessment of the negative impacts has not been undertaken.

Development in the Countryside

We also consider that a further reason for refusal, following the adoption of the Local Plan, is that the development is contrary to the allocation of the site within the Countryside. Had this site been considered suitable for development of any type then it would have been released from this allocation in order to help meet the various development needs of Arun District. We therefore



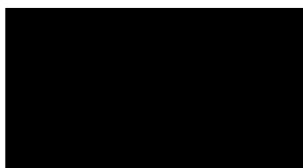
consider that this should form a separate reason for refusal in the Officer's report and not merely linked to the failure of the application to satisfy the retail tests of the Local Plan. This is a reason for refusal in its own right.

Summary

The officer notes that on recent application A/23/15/OUT that members voted against their Officer's recommendations on the basis that the economic benefits of the proposal outweighed the policy conflicts. It should be noted, that the only available information provided by the applicant in this regard is contained within the planning statement and relies heavily on the named potential operator in terms of the benefits that would be generated. The Officer's report has not provided any guidance on this point in terms of the assessment of socio-economic benefits. It would be useful for example for the Officer to advise members what the benefits of the proposal would look like in the event that M&S are not the operator on the site (i.e. using standard job density guidance for retail). Moreover, we think there should be an assessment of the net rather than gross job created by the development and also an assessment of the full time equivalent value of those jobs.

We would be very grateful if this letter could be considered alongside our previous letters of objection to application A/11/17/OUT. We would urge Members to refuse the application as contrary to the newly adopted Development Plan (both in terms of the countryside and retail policies) and also on transport and grounds.

Yours sincerely



Serena Page BA MA (Cantab) MSc MRTPI
Partner
DWD LLP



Cc – Store Property Investments Limited