

From: Amanda Scholes on behalf of Planning.Responses
Sent: 03 August 2017 08:28
To: Planning Scanning
Subject: FW: Rustington Golf Centre - Application A/84/17/PL
Attachments: Retail Policy Issues Note 1st August 2017.docx

From: David Innes
Sent: 02 August 2017 14:19
To: Planning.Responses
Subject: FW: Rustington Golf Centre - Application A/84/17/PL

Please upload to the website.

thanks

David Innes | Planning Consultant , Strategic Development, [Arun District Council](#) | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF DX 57406 Littlehampton
Internal: 37776 | External: +44 (0) 1903 737776 | E-mail: David.Innes@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk



Save the environment - think before you print.

From: Brian Heap [REDACTED]
Sent: 02 August 2017 12:20
To: David Innes
Subject: FW: Rustington Golf Centre - Application A/84/17/PL

David

Please find attached the response from Paul Aldridge, the Planning Consultant who prepared the Retail Impact Assessment in response to concerns raised by Rustington and Amgmering Councils.

Kind Regards

Brian Heap BA Arch Dip Arch. RIBA
Architectural Consultant

2 Hamilton Close
Powick
Worcester
WR2 4NH

RUSTINGTON GOLF CENTRE, GOLFERS LANE, ANGMERING
PLANNING APPLICATION REFERENCE: A/84/17/PL
RESPONSE TO REPRESENTATIONS RELATING TO RETAIL PLANNING POLICY MATTERS

1 This note responds to the representations made by Angmering and Rustington parish councils dated 3rd and 20th July 2017 respectively relating to retail planning policy matters in respect of planning application reference no. A/84/17/PL.

2 The planning application includes the provision of a new Class A1 non-food retail unit comprising 3,807sqm GIA floorspace at the Rustington Golf Centre.

Angmering Parish Council Objection

3 The Angmering Parish Council representation raises the following retail planning matters, *“Need for a retail development of this kind is not demonstrated. Multiple negative impacts on local retail outlets. Retail assessment does not include Angmering.”*

4 The scope of the Retail Assessment was agreed with Arun Council's planning officers. The Assessment excludes specific consideration of Angmering.

5 The proposed non-food retail unit is of a different scale and type of retail floorspace to the shops and services and overall retail offer of Angmering.

6 The proposed non-food retail unit (comprising 3,807sqm GIA floorspace) is not a 'local' shop and is therefore distinct from shops within Angmering.

7 The proposed retail unit would not directly compete with local shops in Angmering which are aimed at serving the day to day needs of local residents. There are no shops within Angmering which sell goods comparable to those sold by Go Outdoors, the intended operator of the proposed retail unit.

8 The Parish Council has presented no evidence of 'significant adverse' affects upon local shops. Conversely, the submitted Retail Assessment demonstrates that the proposed non-food retail component of scheme would not have any significant adverse retail effects.

9 There is no national or local retail planning policy requirement to demonstrate 'need' for the proposed retail unit. The premise being that a retailer/developer would not propose a new store unless there was a need for it.

Rustington Parish Council

10 Similarly, Rustington Parish Council make the following comments in relation to the proposed non-food retail unit:

“It is understood that A1 permission is being sought for a standalone retail unit, with a particular tenant in minds, which could arguably result in a positive impact in this area. However, if this tenant does not subsequently move into this unit, then permission would be in place for any type of retail units, which could result in yet

another grocery/food outlet in what can only be described as an already saturated area in respect of such units. The retail impact of this possibility is not assessed in this application and therefore, significant changes would need to be made to the Retail Assessment to consider any such operator."

- 11 The Parish Council indicates that a new Go Outdoors retail store on the application site would be 'beneficial' for the local area and as such there is an acceptance on the part of the Parish that there would be no significant adverse retail effects upon town centres.
- 12 The Parish Council's sole concern appears to relate to a possibility that the retail unit might in the future be operated as a foodstore. The intended retail operator of the unit is Go Outdoors – a non-food comparison goods specialist retailer. The Retail Assessment describes the Go Outdoors operation and provides details of the types and ranges of goods sold.
- 13 Whilst the application form describes the proposed development as including the provision of a 'new retail unit' it is clear from the supporting Retail and Transport Assessments that the intended use of the unit is for the sale of non-food goods only.
- 14 The Retail Assessment indicates (paragraph 2.11 refers) that the Applicant would be prepared to accept a condition which limits the range of goods to those sold by Go Outdoors together with a range of common non-food bulky comparison goods e.g. DIY, furniture, carpets etc. Accordingly there is no need to assess the proposed retail unit on the basis of a possibility that it may be occupied by a food retailer – a proposition that is neither intended nor possible under the proposed goods restriction.
- 15 The proposed retail unit has been assessed by reference to an average sales density applicable to out of centre non-food retailers consistent with that adopted by the Council's retail study. This sales density exceeds that of a typical Go Outdoors store and therefore the impact assessment presented is robust.
- 16 The provision of bulky comparison goods, in the local area, is predominately found located outside of town centres and provided in the form of comparable retail warehouse units including those located to the opposite side of A259 and to the fringes of Bognor Regis.
- 17 National Planning Practice Guidance (NPPG) recognises that retailers tend to compete on a like for like basis. Accordingly any competition arising from the proposed non-food retail unit will be upon other comparable out of centre retail operators rather than town centres. As the Retail Assessment demonstrates, there are by comparison, relatively few shops located within town centres which sell goods similar to those sold by Go Outdoors. Where these do exist these are identified in the Assessment. In-centre provision is both quantitatively and qualitatively different to the retail offer of the proposed retailer operator.

Location of Retail Development

- 18 The proposed non-food retail unit forms part of revised proposals for the development of land situated between the existing facilities at the Rustington Golf Centre and the A259. The principle of development on the application site is established by planning permission reference no. A/77/16/PL. The retail unit is a proposed substitution for the consented five aside football pitches for which there is no demand.
- 19 The retail offer of the intended operator (Go Outdoors) is a good 'fit' with the existing and proposed retail and leisure facilities at the Rustington Golf Centre. There is a likelihood of linked shopping and leisure trips occurring at this site.
- 20 The Rustington Golf Centre already includes a leisure orientated retail outlet in the form of an American Golf store. Furthermore, planning permission was granted on 16th October 2012 (reference no A/29/12) for a change of use to include the provision of a Class A1 'farm shop' (231sqm floorspace).
- 21 Although the existing and previously consented Class A1 retail floorspace is significantly smaller than that currently being proposed, it is clear that the Rustington Golf Centre already operates as a mixed leisure shopping destination.
- 22 There are no policy restrictions, save the requirement to satisfy the sequential test to site selection, which limits new retail development on the application site, i.e. to the north of the A259. In this respect the same retail planning policy considerations apply to new out of centre retail developments whether they be located to the north or south of the A259 (subject to other non retail planning policy considerations as may be applicable).

Conclusions

- 23 In summary, the following conclusions can be reached in light of the above observations:
 - The proposed retail development is of a different type and scale to the local shops found in Angmering consequently they will not have a significant adverse effect upon vitality and viability. As the NPPG confirms, like tends to trade with like
 - There are no local shops within Angmering which sell comparable ranges of goods to Go Outdoors or bulky non-food goods
 - There is no retail planning policy requirement to demonstrate a 'need' for the proposed retail unit
 - The submitted Retail Assessment tests the turnover of the proposed retail unit in accordance with a non-food sales density. The adopted sales density exceeds that achieved on average by Go Outdoors. If, as proposed, the retail unit is occupied by Go Outdoors then the level of impact identified by the Retail Assessment upon town centres will be overstated
 - The planning application seeks permission for a non-food retail unit. The intended retail operator is Go Outdoors. The Applicant is willing to accept a condition which restricts the use of the unit for non-food purposes thus ensuring the unit cannot be operated as a food store
 - There are no specific retail policies which restrict new retail development on the application site. Out of centre retail development should principally be considered against the impact and



sequential policy tests. The submitted Retail Assessment demonstrates the proposals' compliance against these key tests.