

From: Chris Barker [REDACTED]
Sent: 10 October 2025 17:34
To: Emma Sheppard
Cc: Adrian Fox; Adrian Goodall; Megan Smith; Andy Keen
Subject: P1998 - LU/72/25/OUT - Land West of New Courtwick Lane, Wick - Sequential Test Commentary - Further Actions. 251010
Attachments: Planning Statement.pdf; Decision Notice LU4711.pdf; Land Use Parameter Plan LU4711.pdf; PAA_98_23_202311301231302701.pdf; Decision A12513.pdf; Retail Assessment.pdf; Sequential Test Email Bodyshop 240925.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

Dear Emma,

Following further review of the Nexus commentary on our scheme, in respect of testing alternative sites, I have re-examined the planning permission granted for the "Littlehampton North" development, which Nexus referred to for sequential testing purposes.

Littlehampton North (Ref: LU/47/11) Outline consent granted 23 January 2013 (last RMA must be submitted by January 2026)

The permission approved an outline application (with some matters reserved) for a mixed-use development, comprising:

- Up to 1,260 residential dwellings (out of a potential 1,460 in the masterplan)
- Up to 13,000 sqm of B1 employment floorspace (including a 3,000 sqm Enterprise Centre)
- Up to 3,500 sqm of Class A local facilities
- A 100-bed hotel and 60-bed care home
- A 2-form entry primary school, community centre, and youth/leisure facilities
- A combined heat and power plant, extension to the recycling centre, and green infrastructure (including sports pitches, open space, play areas, and allotments)
- Primary access from a new A259 junction (bridging over the railway), with additional access from Mill Lane and Toddington Lane.

This application was subject to an Environmental Impact Assessment and represented a departure from the development plan. It also affected a public right of way.

Commercial Uses and Retail Parameters

The officer's report and application submissions are clear in respect of retail provision on this scheme:

- Up to 13,000 sqm of business (B1) floorspace, including a 3,000 sqm Enterprise Centre.
- Up to 3,500 sqm of retail floorspace, incorporating a convenience foodstore limited to 500 sqm.

Key points:

- Retail uses were restricted to A1, A2, and A3 categories.
- The convenience store element was explicitly limited to 500 sqm.(with no RIA to support any increased size)
- The retail impact of a 500 sqm store was not assessed, as the Council considered this below the threshold requiring a Retail Impact Assessment. A larger store would have required one.
- The approved Parameter Plan (GR.L-006 Rev A) identifies retail uses beneath residential flats within an area of **0.73 hectares**, and any subsequent reserved matters must comply with these parameters.

Accordingly, the outline consent does **not** provide for a convenience store exceeding 500 sqm, meaning the site cannot accommodate a store of the scale proposed in our scheme. It therefore cannot be considered a suitable alternative under the sequential test. We respectfully request confirmation from officers that this site should not be subject to further analysis.

Consistency with Previous Sequential Site Assessments

When assessing alternative sites, the Council should maintain consistency with its own prior decisions.

The Aldi/Next development (**Ref: A/125/13**), approved in June 2014 on land south of the A259 and west of Mill Lane, Rustington, was submitted nine months after the Littlehampton North outline consent was granted.

That hybrid application proposed:

- **Up to 3,365 sqm of A1 retail floorspace (outline), and**
- **3,947 sqm of sui generis vehicular use (full application), together with parking, landscaping, and access from the A259.**

Importantly, when this scheme was considered and approved, the Council did not include Littlehampton North in its own sequential assessment. Therefore, it would be inconsistent and inappropriate to require our assessment to include it now.

Pre-Application Engagement

At pre-application stage, we engaged proactively with officers regarding sequential testing and agreed the list of sites to be considered. The attached pre application response (dated 30 November 2023) and subsequent email (dated 25 September 2024) confirm this list, which does not include Littlehampton North. Furthermore, it is also notable that Nexus' own comments of 16 July 2025 make no reference to North Littlehampton as an alternative site.

It would not therefore be reasonable to introduce such an alternative site at this late stage.

Site Size and Practical Constraints

Even aside from procedural issues, the consented **0.73-hectare** commercial area at Littlehampton North is too small for our proposal.

An Aldi store alone requires a minimum of 0.8 hectares, as set out in Aldi's published property requirements. Once the additional land required for the proposed drive-thru units is factored in, the total site area needed clearly exceeds what is available at Littlehampton North.

It would not be reasonable to **disaggregate** the drive-thru elements from the assessment, as they form an integral part of our overall proposal. The commercial area at Littlehampton North is clearly therefore too small to meet our operational requirements and should be discounted.

Conclusion

For the aforementioned reasons—notably:

- the retail floor space limitation imposed by the outline consent,
- the Council's established precedent in earlier decisions,
- the constraints on site size, and
- the policy and legal inconsistencies that would arise—

We respectfully request that Littlehampton North be discounted from further consideration in the sequential test.

We look forward to your clarification on this point matter.

Separately we will be in touch with you and Nexus in relation to detailed responses/clarification on their Retail impact report and would suggest a meeting to expedite matters following their consultants return from leave.

We will also be writing to you next week in response to your drainage/SUDS concerns to which we are likely also to request a further meeting.

Any queries please do not hesitate to contact me.

Kind Regards,

Chris Barker
Managing Director, MATP MRTPI

██

We are proud to unveil our new brand refresh as part of ECE Group. Find out more and explore our new website [here](#).



Shaping places.
Unlocking potential.

ECE Planning Limited, Registered in England No 07644833, Registered Office Amelia House, Crescent, Worthing, West Sussex, BN11 1QR.



PLANNING STATEMENT

LAND OFF MILL LANE, RUSTINGTON

**Store Property
Investments Limited**

October 2013

Author:
Serena Page

Approved by:
Malcolm Honour

Report Status:
Final

Issue Date:
October 2013

CgMs Ref:
SP/15901

© CgMs Limited

No part of this report is to be copied in any way
without prior written consent.

Every effort is made to provide detailed and accurate
information, however, CgMs Limited cannot be held
responsible for errors or inaccuracies within this report.

© Ordnance Survey maps reproduced with the
sanction of the controller of HM Stationery Office.
Licence No: AL 100014723

CONTENTS	PAGE(S)
1.0 INTRODUCTION	4
2.0 SITE AND SURROUNDINGS	6
3.0 THE PROPOSAL	12
4.0 PLANNING POLICY FRAMEWORK	15
5.0 PLANNING ISSUES	18
6.0 PRINCIPLE OF DEVELOPMENT	19
7.0 DESIGN AND VISUAL IMPACT	24
8.0 HIGHWAYS, TRANSPORT AND PARKING.....	26
9.0 NOISE, AIR AND LIGHT POLLUTION	29
10.0 FLOODING/DRAINAGE	31
11.0 ARCHAEOLOGY	32
12.0 ECOLOGY AND TREES.....	33
13.0 ECONOMIC DEVELOPMENT	34
14.0 CONCLUSIONS	38

1.0 INTRODUCTION

- 1.1 This planning statement has been prepared by CgMs Ltd acting on behalf of Store Property Investments Limited in support of a hybrid application for two retail units and a car show-room on land to the west of Mill Lane and South of the A259.
- 1.2 The purpose of this statement is to assess the proposal against the development plan for the area, and other material considerations by reference to supporting technical documents and drawings.
- 1.3 The application seeks planning permission for:
- "Hybrid application for development of the site to provide up to 3,365 sq.m. (gross external area) floorspace for Class A1 retail uses in outline with all matters reserved with the exception of landscaping and access, and 3,947 sq.m. (gross external area) of sui generis floorspace for vehicular use including workshop, MOT facility, car valeting and car storage in full with a new access from the A259."
- 1.4 The application is submitted in hybrid, seeking full planning permission for the eastern part of the site, and outline planning permission for the western part of the site with all matters reserved apart from means of access and landscaping.
- 1.5 The applicant has undertaken a public consultation exercise, the results of which are detailed in the Statement of Community Involvement submitted in support of this application. The proposal has been subject to pre-application discussion with Arun District Council, and various other statutory and non-statutory consultees.
- 1.6 The extent of submitted documentation and plans has been agreed with Arun District Council as part of pre-application discussions. This report should be read in conjunction with a number of other reports and studies that have been prepared in support of the proposal namely:

- Retail Assessment by CgMs
- Design and Access Statement by ECE
- Transport Assessment by Mayer Brown
- Framework Travel Plan by Mayer Brown
- Landscaping Plan by ACD Landscape
- Flood Risk and Drainage Assessment by GTA Civils
- Land Contamination Assessment by CARD Geotechnics
- Ecology Assessment by PJC Consultancy
- Noise Impact Assessment by 24Acoustics
- Written Scheme of Archaeological Investigation by ASE
- Land Engineering Statement by CTP
- Statement of Community Involvement by CgMs

1.7 Further to the pre-application response from Arun District Council, a number of documents will follow in support of the application including a Landscape and Visual Impact Assessment and Air Quality Assessment.

1.8 This Planning Statement is set out as follows:

- Section 2.0 provides a description of the site, its relevant planning history and land use designations;
- Section 3.0 describes the proposed development;
- Section 4.0 outlines the national and local planning policy context;
- Sections 5.0 to 13.0 analyses the development proposal in relation to the development plan and relevant material considerations;
- Section 6.0 concludes on the relevant planning considerations of the proposal.

2.0 SITE AND SURROUNDINGS

- 2.1 This section of the Planning Statement provides a detailed description of the site and its surroundings. This section includes the relevant planning history for the site and for the adjacent retail park site.

Application Site

- 2.2 The application site comprises agricultural land. Planning permission has been granted, and development has commenced on the redevelopment of the site for car showroom use in respect of the access arrangements. The details of this proposal are discussed in respect of the planning history.
- 2.3 The site is situated to the south of the A259, north of which is a golf course. To the south and immediately adjacent to the site is a railway line, beyond which is an industrial estate. To the east of the site beyond Mill Lane is a retail park consisting of a number of non-food retail units and a Sainsbury's store. At the time of writing Sainsbury's are temporarily occupying the former Focus unit, whilst construction is underway on the recently permitted store extension. The retail park and the site are separated by Mill Lane road bridge. There is a permanent gypsy pitch to the west of the site. The main views of the site are from the A259.
- 2.4 It should be noted that whilst the site is described as Mill Lane, Rustington on account of its relationship to the built development boundary adjacent, the site falls within the Parish of Angmering. It was felt that most people would associate the site as being within Rustington, and hence this has been used within the address to assist in identifying the site.

Site Designation

- 2.5 The statutory development plan identifies the site as outside the development boundaries of Rustington. The site is 'out of centre' in retail planning policy terms.

Planning History

- 2.6 The planning history of the site is described in the table below. Material to the consideration of this planning application is outline permission reference A/14/05 for car showrooms and associated access, parking and landscaping which was granted on 15 March 2006. Subsequently, on 28 June 2006, planning permission A/44/06 was granted to vary condition 3 of the outline consent and so A/44/06 provides the relevant base permission. This was subject to 19 conditions
- 2.7 The approval of reserved matters (A/29/09) on 21 May 2009 complied with condition 1 of A/44/06 and was subject to six further conditions. Implementation of the planning permission has commenced in accordance with condition 2 of planning permission A/44/06 and as such it is considered that this permission can be implemented in full. However, it is noted from the Council's pre-application response that Arun District Council considers that this application has expired on the basis that a certificate has not been obtained for the commencement of development.
- 2.8 Prior to this the land was used for agricultural purposes.

Table 1: Site Planning History

Application ref.	Proposals	Decision Date	Decision
A/37/03	Outline application for car showrooms and associated access, parking and landscaping	22.12.03	Withdrawn
A/94/04	Outline application for car showrooms and associated access, parking and landscaping. Re-submission following A/37/03.	03.09.04	Refused – appeal withdrawn
A/148/05	Outline application for car showrooms and associated access, parking and landscaping.	15.03.06	Permitted
A/44/06/	Variation of condition 3 of planning permission A/148/05 to relate to occupancy set out in unilateral agreement.	28.06.06	Permitted
A/29/09	Approval of reserved matters following outline consent A/44/06 for car showrooms	20.05.09	Permitted

Rustington Retail Park Planning History

- 2.9 The planning history for the adjacent retail park has also been provided for reference, and in relation to the applicant's willingness to revoke without compensation the consent which allows for the expansion of retail floorspace on the retail park, if planning permission is granted for the current application, and the retail units occupied.
- 2.10 An application was approved in August 1987 (Ref R/194/87) for the erection of a 3,252 sq. m (35,000 sq. ft.) ground floor non-food retail warehouse space with ancillary offices on first floor with associated parking and alterations to existing highway. This application was implemented and forms part of the existing retail park.
- 2.11 A further application was approved in October 2008 (Ref. R/72/08) for the alteration to Rustington Retail Park to include the demolition of the existing Focus Unit (& associated garden centre), construction of 3 retail units (including garden centre) and alteration to the car park and associated landscaping alterations. The planning permission has not yet been implemented and was renewed by planning permission (Ref. R/210/11) in December 2011. Including the redeveloped Focus unit, the development will deliver an increase of approximately 5,110 sq. m (55,000 sq. ft.) comparison floorspace at the retail park.
- 2.12 Planning permission was granted in December 2011 to renew un-implemented Planning Permission R/72/08 to allow for: "Alterations to Rustington Retail Park to include the demolition of the existing Focus Unit (& associated garden centre), relocation of electricity sub-station, construction of 3 retail units (including garden centre), alteration to car park and associated landscaping alteration". Condition 10 of the permission restricted the range of goods sold to 'sale of furniture and floor coverings; domestic electrical and gas appliances; cycles and cycle parts and accessories; pets and pet supplies; stationery and office supplies and equipment; hardware, DIY goods and decoration supplies, and garden products; and goods and services for the repair and maintenance of motor vehicles; and for no other purpose (including any other purpose in Class A1 of the Schedule to the Town and Country Planning (Use Classes) Order 2005, or in

any provision equivalent to that Class in any statutory instruments revoking and re-enacting that Order with or without modification.)”

- 2.13 The application for the renewal of the consent for the redevelopment of the Focus unit was accompanied by a planning and retail statement by Chase and Partners LLP (September 2011). The planning permission was included as a commitment within the Arun Retail Study Update 2010, which found that even including commitments at 2010, that there would be a capacity for comparison goods of 1,300 sq. m at 2016. Paragraph 5.57 of the Chase and Partners report states that since the publication of the 2010 DTZ study there have been no other retail warehouse scheme in the locality that have been consented. On account of the limitation of the range of goods sold from the permitted floorspace the impact on the town centre would be minimal as the floorspace would compete for trade with other out-of-centre locations which trade similar types of goods.
- 2.14 In 2013 a series of applications have been submitted in respect of the permission for the additional floorspace at Rustington retail park including a change to the range of goods that can be sold from the units, requiring a section 73 application.
- 2.15 The table below summarises the relevant planning history for Rustington Retail Park for reference.

Table 2: Rustington Retail Park Planning History

Ref.	Proposal	Decision	Determination Date
R/24/87	Outline application for 10,000 sq ft of non-food retail warehouse space with associated vehicle parking and supporting service area and service road.	Withdrawn	15.11.1988
R/36/87	Outline application for access road for service vehicles	Withdrawn	29.04.1987
R/194/87	35,000 sq ft of ground floor non-food retail warehouse space plus 1,100 sq ft of ancillary offices on first floor with associated vehicle parking, site roads and alteration to existing highways.	Approved	10.08.1987
R/269/87	Revisions to car parking and access road layout from that approved under planning permission R/142/87	Approved	21.12.1987

R/272/87	Outline application for 18,000 sq ft of non-food retail warehouse space and associated car parking.	Approved	16.12.1987
R/216/88	Details in pursuance of R/272/87 for 18,000 sq ft approx. non-food retail warehouse space – details of design and external appearance of the building.	Approved	05.12.1988
R/180/92	Non-compliance with Condition No 5 imposed on Planning Permission R/194/87 for new external sales area, and provision of extra car parking.	Refused	13.08.1993
R/156/93	Non-compliance with Condition No 5 imposed on Planning Permission R/194/87 for new external sales area, and provision of extra car parking	Approved	01.11.1993
R/135/94	Formation of new external compound as garden centre	Approved	30.11.1994
R/172/94	Alteration and improvement of access and car parking layouts with the provision of new landscaping areas	Approved	08.03.1995
R/171/94	Details in pursuance of R/272/87 for non food retail warehouse space –altered elevation and floor plan layout (previously approved and partly implemented under consent R/216/88)	Approved	08.03.1995
R/32/95	1,690 sq m approx. of non-food retail warehouse units	Approved	28.06.1995
R/155/95	Formation of new entrance doors to the front elevation and new roller shutter door entrance to side elevation for proposed sub division of retail store	Approved	13.12.1995
R/54/06	Construction of a restaurant building for use for purposes within Class A3 of the Use Classes Order 1987 (as amended)	Approved	20.06.2006
R/78/08	Alterations to Rustington Retail Park to include the demolition of the existing Focus Unit (& associated garden centre), relation of electricity sub-station, construction of 3 retail units (including garden centre), alteration to car park and associated landscaping alterations	Approved	03.10.2008
R/103/10	External alterations, reconfiguration of car parking, pedestrian and cycle access to provide refurbished retail unit.	Approved	18.08.2010
R/105/10	Erection of mezzanine floor	Approved	18.08.2010
R/10/11	Variation of condition 4 attached to planning permission R/194/87 to allow for the sale of food within the Focus retail unit; alteration to the external elevation and a new mezzanine comprising an additional 465 sq m retail floorspace	Approved	15.07.2011
R/210/11	Renewal of unimplemented planning permission R/72/08	Approved	05.12.2011
R/60/12	Temporary use of former Focus retail unit as Class A1 food store for the period of 18 months.	Approved	01.11.2012
R/149/12	Alterations to car park layout, access and landscaping	Approved	21.09.2012
R/24/13	Erection of temporary structures adjacent to western elevation of the store, along with various permanent aesthetic and	Approved	15.04.2013

	access alterations to main building		
R/67/13/ NMA	Application for a non-material amendment following a grant of a planning permission R/210/11/ to include a condition listing the approved plans	Approved	19.04.13
R/70/13/	Installation of plant units at side of store and within store service yard for a temporary period	Approved	14.05.13
R/99/13	Application for variation of condition 10 imposed under R/210/11 relating to the type of goods sold and variation of plans condition imposed under non material amendment R/67/13/NMA relating to layout of site	Approved	26.07.13
R/123/13	Extension of service yard road to the rear of the existing Unit 2 to allow a continuous service road along the rear of Rustington Retail Park	Approved	26.06.13
R/131/13	Enhancement of north elevation	Approved	26.07.13

3.0 THE PROPOSAL

- 3.1 This hybrid planning application seeks full planning permission in respect of the proposed car showroom development, and outline planning permission in respect of the retail floorspace (with access and landscaping unreserved). The total site area is 4.6 ha. We provide details of both components of the planning application below:

Retail Units

- 3.2 Outline planning permission is sought for two retail units with the maximum floor areas, denoted in the table below:

	GEA	GIA	Net Sales
Non Food	1900	1860	980
Food	1465	1400	1302

- 3.3 As described above it is proposed that one of the units will be used for food retailing (convenience) and one will be used for non-food retailing (comparison). This aspect of the application is submitted in outline on the basis that tenants have not been secured for the proposals. Landscaping and access are unreserved. The site area for the outline component of the application measures 1.9 ha. The assessment of one of the units as food retailer represents a worst case scenario. In the event that this retailer is occupied by a non food retailer the impacts would be less.

Car Showroom

- 3.4 Full planning permission is sought for a new BMW and MINI motor trade dealership with associated workshop and MOT facility, along with external used vehicle display.
- 3.5 This component of the application site measures 2.7 ha. The total building area measures 3,798 sq m, (GIA).

3.6 Chandlers BMW has operated a car dealership facility incorporating a vehicle showroom for new cars, display spaces for used cars, service and repair workshop facilities and a body shop from its site in the centre of Angmering for over 30 years. The company added to its facilities a standalone showroom facility in Rustington and also utilised an additional stand-alone light industrial unit for overflow servicing and MOT activities as the main Angmering site is too small to accommodate the full volume of business activities. The businesses has outgrown their premises, and the need to use separate sites has led to inefficiencies and increased resource consumption. The current premises also cause problems for customers and staff. A new purpose designed modern dealership facility will create an environment which will fit well into the local community and provide the foundation for the future of Chandlers as a significant local firm looking to employ local people and provide high quality services to local people. If a facility can not be secured in an appropriate timescale, Chandlers will need to consider options outside the District.

3.7 Currently the Chandlers business operates from 4 sites. The current sites operated are:

1. Water Lane, Angmering – used for BMW sales of new and used vehicles plus the workshops, body shop and parts for both BMW and MINI;
2. Ash Lane, Rustington – Used for the sale of new and used MINIs;
3. Industrial unit G1, Dominion Way, Rustington Trading Estate, Rustington – use for the preparation of vehicles prior to sale, pre delivery inspections and MOTs;
4. Open storage site off Dominion Way, Rustington Trading Estate, Rustington – a secure fenced parcel of land which is used for the storage of new and second hand vehicle plus the cleaning of vehicles.

3.8 The aforementioned sites could then be redeveloped for alternative uses which would contribute to the needs of Arun. For example, planning permission will be sought under separate cover to redevelop the Ash Lane site within Rustington

centre for a retail unit, which will better contribute to the centre's vitality and viability.

Access and Car Parking Provision

- 3.9 The proposed access is from the A259 dual carriageway via a left in/left out junction with merge and diverge lanes. The detail of the access in terms of design parameters is contained within Section 2 of the Transport Assessment. Within the site an internal roundabout is proposed which would provide access to the car showroom to the east and access to the retail units to the west. The access would be designed to accommodate a bus service.
- 3.10 Deliveries to the car showroom would be made using a lay-by on the southern boundary of the site, just east of the internal roundabout. For the food and non-food retail units, delivery vehicle are segregated from customers via a dedicated service road access just off the western arm of the internal roundabout. This provides access to the rear of the units via a turning head at the western end of the site.
- 3.11 It is proposed to implement a new footway/cycleway to provide linkage from the site to the existing footway/cycleway on the eastern side of Mill Lane that provides access to West Preston to the south, and Rustington Retail Park to the east, details of which are provided within the Transport Assessment.
- 3.12 The proposed parking would all be at ground level and accessed via the internal roundabout discussed above. 36 customer spaces are proposed for the BMW/MINI garage of which four will be for dedicated disabled use. In addition 30 staff parking space are shown, and parking for six bicycles.
- 3.13 A shared car park will be provided for the food and non-food retail units providing 190 customer parking spaces of which 14 would be dedicated for disabled use. Parking for 12 bicycles is proposed.

4.0 PLANNING POLICY FRAMEWORK

- 4.1 This section examines the national and local planning policy context in relation to the application site and the proposed development.
- 4.2 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. In the event of conflict between policies in the adopted plan with Government policy, it is the most recent policy which takes precedence. With this in mind the National Planning Policy Framework (NPPF) which was issued in March 2012 is materially relevant.

National Planning Policy Framework

- 4.3 The National Planning Policy Framework (NPPF) published in March 2012 sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6). The NPPF states that there are three dimensions to sustainable development, namely the economic, social and environmental roles, which are mutually dependant.
- 4.4 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 14 of the NPPF states that in decision making, the presumption in favour of sustainable development means:

"Approving development proposals that accord with the development plan without delay; and

Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- specific policies in the Framework indicate development should be restricted."*

- 4.5 The Government proposes to deliver sustainable development by securing economic growth in order to create jobs and prosperity (paragraph 18). Indeed, paragraph 19 confirms that:

"The government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system."

Local Planning Policy

- 4.6 The development plan for Arun District Council consists of the Arun District Local Plan. The following saved policies could be considered to be relevant to the determination of this application:

GEN2: Built-up Area Boundary;

GEN3: Protection of the Countryside;

GEN7: The Form of New Development;

GEN8: Development and the Provision of Infrastructure;

GEN9: Foul and Surface Water Drainage;

GEN12: Parking in New Development;

GEN14: Public Transport;

GEN15: Cycling and Walking;

GEN32: Noise Pollution;

GEN33: Light Pollution;

GEN34: Air Pollution;

DE8: Circumstance in which Additional Development may be Permitted – Local Firms;

DEV26: Criteria for Retail Development;

DEV27: Retail Development Outside the Principal Shopping Area.

- 4.7 The weight applied to the policies above needs to be assessed in accordance with the NPPF. Those in the Local Plan that have been saved, retain the full standing of development plan policies. However, the Framework states that policies not adopted since 2004 should be given due weight according to their degree of consistency with the Framework.
- 4.8 It is considered that the way policies GEN2 and GEN3 are expressed through boundaries on the ground has become out-of-date, as they need to take account of the development needs arising in the District after 2011, and as such will be revised in the emerging planning policy. Therefore policies within the NPPF would attract greater weight than both of these policies.
- 4.9 On the basis of the above it is considered that if Officers consider that the proposal conflicts with Policies GEN2 and GEN3 of the Local Plan 2003, this is not in itself a sufficient reason to refuse the application. On the basis the GEN2 and GEN3 are out-of-date by reference to the NPPF, it follows that the application of Policy DEV8 is also out of date on account of its reliance on the GEN2 and GEN3 policies. However, even on a solus basis the degree of consistency of Policy DEV8 with the NPPF is uncertain. On the one hand it is clear that the objectives of this policy are repeated in emerging policy, however, this has not yet been subject to examination. The NPPF gives explicit support for employment and job creation, it is therefore considered that the policy is compliant with the NPPF insofar as it sets out tests whereby employment generating development will be acceptable on unallocated sites.
- 4.10 However, the policy is not considered compliant in respect of applying these tests to existing employers only. Paragraph 19 of the NPPF states that: "planning should operate to encourage and not act as an impediment to sustainable growth." Paragraph 21 of the NPPF requires Local Planning Authorities to "set criteria, or identify strategic sites, for local **and inward investment...**" [CgMs emphasis]. We therefore consider that Policy GE8 should be afforded some weight in the determination of application, but not full weight, as the criteria should apply to all employers looking to locate within the District.

5.0 PLANNING ISSUES

5.1 On the basis of the review of relevant planning policies, we consider the key planning issues to be considered are as follows:

- Principle of Development;
- Design and Landscape Impact;
- Highways, Transport and Parking;
- Noise, Air and Light Pollution;
- Contamination;
- Sustainability;
- Flooding/Drainage;
- Archaeology;
- Biodiversity;
- Economic Development.

5.2 The following sections of this report proceed to analyse the proposed development in respect of the planning issues identified above.

6.0 PRINCIPLE OF DEVELOPMENT

- 6.1 This section of the planning statement assesses the principle of the proposed development against the policies identified in section 5. It is considered that this assessment can be broken down into two separate considerations: development outside built-up area boundary; and retail considerations.

Development Outside Built-Up Boundaries

- 6.2 As noted above, it is considered that both GEN2 and GEN3 of the Local Plan are inconsistent with the provisions of the NPPF, and therefore should be discounted for the purposes of the consideration of this application. This has been acknowledged within the Council's pre-application response and also in relation to applications on other sites within the District that fall outside the development boundary.
- 6.3 Notwithstanding the assessment of Policies GEN2 and GEN3, the applicant can demonstrate compliance with Policy DE8 which states that "Planning permission may be granted to local firms, currently located within the District proposing development on sites outside the built-up area..." Planning permission has already been granted on the site for car showroom use including the construction of buildings and the provision of car parking. Chandlers BMW/MINI are a local firm who have been established in the District since the 1980s, having originated in Worthing in the 1960s. The firm operates from 4 existing sites in the District and employ almost 90 equivalent full time staff across these sites with a large proportion of staff living within Arun District. It is considered that Chandlers BMW/MINI should be considered a Local Firm for the purposes of Policy DE8.
- 6.4 Chandlers BMW/MINI have assessed a variety of sites that could be suitable for accommodating the scheme. The assessment of sites was considered in full in relation to application reference A/130/12. The proposal site on account of its availability now has the highest score and therefore is preferable to the Roundstone Farm site previously pursued.
- 6.5 The search criterion based on operational criteria was as follows:

- The site location to be to the west of Worthing and to the east of Littlehampton;
- The site selected to offer approximately 4 acres of developable space incorporating buildings of circa 4,000 – 5,000 sq m;
- The site to have good prominence;
- The site to be readily accessible with good road access/communications.

6.6 The sites were also assessed in terms of considerations such as physical constraints and planning constraints.

6.7 The current application site was originally discounted on account of 'availability' on the basis that the infrastructure costs for vehicular access and services would not support the use as a motor vehicle dealership. It was also considered unavailable from the landowner who at the time wished to sell to a developer for retail development only. In all other respects this site scored highly on account of its location, size, accessibility, planning status, countryside impact, residential amenity impact, and wider benefits to the general public.

6.8 It should be noted that the application was identified by the Local Authority as the best relocation option for Chandlers. For example, the pre-application response in respect of the Roundstone Farm site stated:

"Site 3 [the Land West of Mill Lane Site] has expired permission for car showrooms (A/44/06/ and A/29/09). The District Council considers the site the most appropriate location for car showrooms in the eastern part of the District and considers the chances of a new application for car showrooms receiving permission to be high. The Council would expect to see substantial evidence to convince it that this site was not a viable option for Chandlers to relocate to."

6.9 The site which has been bought by the applicant is not available to Chandlers, where it has not been previously. The applicant also owns three of the four

existing Chandlers sites, and would be in a position to redevelop/reoccupy the units to create even more jobs and investment in the local area.

- 6.10 On the basis of the considerations above it is clear that the Proposal accords fully with Policy DEV8 of the adopted local plan. The rationale for the retail element of the proposal is to facilitate the delivery of the car show-room element of the proposal, which in and of itself is not able to support the infrastructure and service costs associated with the proposals. Although this is the rationale for the development, viability information has not been submitted in support of the application on the basis that it is considered that the proposals are acceptable on their own merits. In respect of policy DEV8 it should be noted that the Developer of the units has significant landholder interests in Arun District, including retail interests within Rustington District Centre, and therefore should also be considered a Local Firm, even though the registered address of the business sits outside of Arun.
- 6.11 As stated above, we consider that this policy is consistent with the NPPF only insofar as it sets out reasonable criteria for assessing development outside allocated development sites. We do not agree that the policy is consistent with the NPPF in promoting existing investment over inward investment and on this basis the criteria should apply to all types of employment development.

Retail Considerations

- 6.12 The site is out of centre in planning terms and therefore in order to conform with planning policy, must demonstrate that it is sequentially the most preferable site, and will not have a significant adverse impact on town centres.
- 6.13 The NPPF, like its PPS4 predecessor, directs new retail development to town centres to support their viability and vitality. Proposals outside town centres and not in accordance with an up to date development plan should be subject to sequential and impact testing.
- 6.14 Paragraph 24 of the NPPF requires a sequential test to be applied on planning applications for main town centre uses that are outside an existing centre or not in accordance with an up-to-date development plan. When considering edge of

centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.

6.15 Paragraph 26 of the NPPF requires an impact assessment for development located outside of a town centre or not in accordance with an up-to-date Local Plan which exceed a proportionate locally set threshold (a default threshold of 2,500sqm if there is no local policy threshold). Paragraph 26 goes on to note that impact assessments should consider two matters:

- *"The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- *The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application was made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made."*

6.16 Development should only be refused if an application fails to satisfy the sequential test or is likely to have 'significant adverse' impact on one or more of the above factors.

6.17 The Retail Statement produced by CgMs has assessed the development proposals against the retail tests and considers that these tests are passed in accordance with Policy DEV27 of the Local Plan and the NPPF. The report finds that:

- The proposal will not have a significant adverse impact on the vitality and viability of the town centres within the catchment area, on a solus or on a cumulative basis;
- The proposal has good accessibility levels by non private car modes, and measures have been designed to maximise accessibility levels;

- There are no sites within the town centre or on the edge of the town centre that can accommodate the development;
- The proposals will, within the reserved matters, ensure that the retail units make appropriate provision to enable access for people with disabilities.

6.18 In accordance with policy DEV27, if appropriate, the range of products sold within the units could be conditioned.

6.19 Policy DEV27 requires that applicants demonstrate need for additional facilities. This aspect of the policy is considered to be out of date by reference to the NPPF and therefore this has not been undertaken as part of the Retail Statement.

6.20 In this regard it should be noted that the non-food element of the proposal benefits from planning permission on the adjacent retail park site. The applicant who owns both sites, is content to revoke this permission without compensation in favour of a permission, allowing occupation of the retail units proposed in this application. The retail units will complement the car dealership, and facilitate the infrastructure and services necessary and will also better meet retailer requirements. On this basis the only new element proposed in out-of-centre terms is the food retail use.

6.21 Furthermore it should be noted that the applicant, who is also a significant landowner in Rustington has sought to achieve a quantum of floorspace sufficient to satisfy retailer demand within the town centre. However, development of the scale required was resisted in the town centre. Two applications have been withdrawn to date on this site, the second went to committee with Officer recommendation for refusal and was deferred. Officers considered that the proposal was too large for the site and consequently had knock on impacts for the town centre.

6.22 Having regard to the policy tests contained within both national and local planning policies it is considered that the proposals meet the necessary tests and therefore the principle of the development proposed is acceptable in this location.

7.0 DESIGN AND VISUAL IMPACT

- 7.1 Planning policies support the efficient and effective use of land. Policy GEN7(i) requires new development to respond positively to the identified characteristics of a particular site to create development which respects local characteristics. Policy GEN7 also requires that development responds positively with the identified characteristics and resources of the site and the area to create attractive places and spaces with the needs of people in mind and respects and enhances local distinctiveness. Policy GEN7 relates to sustainability including the effective use and conservation of energy and reducing the need to travel particularly by private car.
- 7.2 The design has also had to respond to a number of site specific constraints including a number of easements and rights of access.
- 7.3 Good roadside prominence is important from a commercial perspective. The proposed development provides for a high quality development that provides for a new frontage development along the A259. The design of the retail units is a reserved matter at this stage. The build will be of high quality and will make a positive contribution to the visual amenity and architectural quality of the local area. Given the visual prominence of the site, the design of the proposed units will be of importance. There are a number of positive examples of good design being applied for out of town centre retail schemes along the south coast including Next at Holmbush and Morrisons in Littlehampton. These will assist in ensuring a high standard of design will be developed for the site. In respect of the car showroom development it is noted that during the public exhibition no negative feedback was received in terms of the design presented.
- 7.4 From the pre-application response Officers have suggested design components that could assist in integrating the proposal with its surrounding include a green roof and more muted finishes. It is not possible to fix this level of detail at this stage, and for this reason design is a reserved matter. We consider that the requirement to agree these details with the Local Planning Authority at a subsequent stage affords the necessary controls required to ensure that the proposals accord to the high standard of design suggested within the Design and Access statement. It will be necessary for the reserved matters submission to

comply with Policy DEV26 of the Local Plan that requires that retail development is “of a high standard of design, materials and layout, and has due regard to the character of the site and its surroundings.” Furthermore the detailed design will ensure that appropriate provision is made for people with disability and will incorporate crime prevention measures in accordance with Policy DEV26.

- 7.5 Overall the development will result in a sustainable form of development that will provide for highly energy efficient buildings. The buildings have been designed to meet a BREEAM ‘Very Good’ rating. It should be noted that BMW have a Europe wide policy that all new buildings have a mandatory requirement to achieve sustainability performance of at least equivalent to BREEAM ‘Very Good’.
- 7.6 The design includes strong landscape barriers along the southern and western boundaries. The landscaping proposal for the site boundaries and throughout the car parking areas are of a high standard.
- 7.7 Advertisement consent will be sought through a subsequent application for advertisement consent.
- 7.8 In summary the proposal fully accords with the provisions of design policy at the local and national level. The proposal will not have an adverse impact on adjoining land uses or properties and will not be adversely impacted by those uses that currently exist. The proposals will allow for the safe movement of pedestrians and vehicles and provide vehicle parking in accordance with Policy GEN13 of the Local Plan.

8.0 HIGHWAYS, TRANSPORT AND PARKING

- 8.1 A Transport Assessment has been produced to assess the transport and accessibility impacts of the proposal in accordance with paragraph 32 of the NPPF. In addition separate Framework Travel Plans have been produced for both components of the site in accordance with paragraph 36 of the NPPF. The report follows pre-application engagement with West Sussex County Council. It should be noted that paragraph 32 of the NPPF states that "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe." The Transport Assessment has assessed the cumulative impacts of the development and it is concluded that the A259/A2187 roundabout will continue to operate with spare capacity after the proposals are built and trading.
- 8.2 One of the 12 core planning principles of the NPPF is to "actively managed patterns of growth to make the fullest possible use of public transport, walking, and cycling, and focus significant development in locations which are or can be made sustainable." (Paragraph 17) Section 4 of the NPPF relates to 'promoting sustainable development' and states that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel" (paragraph 29). The transport assessment demonstrates that the opportunities for sustainable transport modes have been taken up, and that safe and suitable access to the site can be achieved for all people and therefore accords with the provisions of the NPPF at paragraph 32. The access roads have been designed to accommodate buses if a service can be secured in accordance with saved Policy GEN14.
- 8.3 The proposals have been designed to give priority to pedestrian and cycle movement. The layout of the proposal has sought to minimise conflicts with cyclists and pedestrians, and the design and accessibility of the proposal has had regard to the needs of people with disabilities in accordance with paragraph 35 of the NPPF and in accordance with saved Policy GEN15 of the Arun District Local Plan.

- 8.4 The provision of car parking spaces accords with saved Policy GEN12 of the Arun District Local Plan.
- 8.5 The application site is out-of-centre, but nevertheless provides good accessibility to local bus stops and Angmering train station. The A259 New Road also has a shared footway and cycleway along its southern side providing safe access to the site. In respect of the above it is considered that the proposal comply with Policy DEV26 (ii) and (iii) and (iv) in that the proposals are:
- Easily accessible on public transport;
 - Includes provision for access by cycle and on foot;
 - Includes appropriate provision to enable access for people with disabilities.
- 8.6 Saved policy GEN12 of ADC's Local Plan 2003 (Saved Policies) states that "the Local Planning Authority will base its consideration of the need for on-site parking provision on its parking standards contained within this Plan". The maximum parking standard for superstore/supermarket is one space per 10 sq. m, and one space over 20 sq. m for non food. 190 spaces are proposed for the retail units, which is within the maximum of 233 set out in the Local Plan. The Local Plan standard would require 9 of these spaces to be allocated for disabled use. Therefore the proposed 14 allocated spaces is compliant, as it exceeds this minimum.
- 8.7 In respect of cycle parking the 16 spaces proposed are compliant with the SPG, which exceeds the minimum set out in the Local Plan of one cycle space per 16 car parking spaces. The number of motor cycle spaces is in line with the minimum level required by the Local Plan of one space per 30 parking spaces, providing 6 motorcycle spaces.
- 8.8 The parking associated with the car showroom use is also compliant with saved Policy GEN12, which requires a maximum of one space per 30 sq. m. The proposed number of 36 parking spaces is well within the 128 that the Local Plan policy would allow for.

- 8.9 In all respects with the exception of cycle parking, the proposals are compliant with the standards set out in West Sussex County Council's SPG. The WSCC guidance would require 32 cycle spaces. In agreement with WSCC the use of the cycle parking will be monitored and additional hoops will be installed if required.
- 8.10 Analysis of accident statistics for the area within the vicinity of the site indicate that there are no inherent highway design problems. Infrastructure proposed to assist pedestrians and cyclists as part of the proposed development would serve to improve highway conditions and safety for these users.
- 8.11 In summary, it is concluded that the proposal is easily accessible by public transport and includes provision for access by cycle and on foot and in this respect is considered to be compliant with Policy DEV26 of the Local Plan. Policy GEN8 of the Local Plan relates to the delivery of infrastructure and requires that development is phased in step with the delivery of necessary infrastructure, and the potential for the contribution of funds toward the cost of infrastructure. The transport assessment has provided details of the necessary infrastructure to serve the proposal.

9.0 NOISE, AIR AND LIGHT POLLUTION

- 9.1 A Noise Impact Assessment accompanies the planning application prepared by '24 Acoustics' which considers the impact of the activity associated with the proposed uses and construction. The report concludes that the noise from the proposed activities will generate no observable effects at the nearest residential properties to the site. The increase in noise level from the increased road traffic movements at residential receptors on roads leading the development is also determined to be negligible (also leading to no observable effects).
- 9.2 At this stage the noise levels for components such as plant are not known. The assessment therefore considers suitable noise limits which may be adopted within planning conditions if required.
- 9.3 The application site is not located within an air quality management area, and the scope of the application discussed with the Local Planning Authority did not list Air Quality as an issue to be supported by technical reports. However, it is noted within the Council's pre application response that an Air Quality Assessment is required to accompany the application. This work has been instructed by the Applicant and will follow shortly after validation. However, the proposal represents only a small uplift in built development from that already permitted by the Local Authority in this location. It is considered that the additional air quality impact of additional vehicular trips is minor, and would not result in a cumulative impact that would be unacceptable.
- 9.4 A lighting plan has been submitted in support of the application which demonstrates that the light-spill from the proposed development will not have an adverse impact. It is not possible to provide lighting details for the outline component of the application, however, these details will be provided at a later stage and will follow principles similar to the eastern side of the application in respect of minimising light spill.
- 9.5 It is therefore considered that the proposals are not at risk, and do not put existing development at risk of being adversely affected by unacceptable levels of air or noise pollution and therefore are compliant with section 11 of the NPPF. The proposals do not represent development that is sensitive to noise, and the

noise levels that will result from the development have been thoroughly assessed to ensure that the proposals will not generate significant amount of noise pollution in accordance with Policy GEN32 of the Local Plan. The lighting scheme proposed for the eastern side of the site will have no adverse impact on neighbouring uses or the wider landscape, and represent the minimum levels required for the commercial operation of Chandlers business. Potential glare and spillage has been minimised through design. The lighting design for the retail component of the application has not yet been decided, but will follow similar principles. Finally the proposal is compliant with Policy 34 of the Local Plan in respect of air pollution. The proposal will result in limited air pollution through dust (during construction), fumes (additional vehicular trips) and smell (limited operational smell), none of which would impact on the health, safety and amenity of users of the site or surrounding land nor that would damage the surrounding environment.

10.0 FLOODING/DRAINAGE

- 10.1 A Flood Risk Assessment has been prepared by GTA Civils Limited, based on pre-application engagement with the Environment Agency. The report demonstrates that the vast majority is within Flood Risk Zone 1, at low risk of flooding. Only a small proportion of the site (the south western corner) is located within Flood Risk Zone 2 meaning it has a medium risk of flooding which is a risk of between 1 in 1000 (0.1% annual change and a 1 in 100 (1%) annual probability.
- 10.2 The development is not considered to be vulnerable to flooding not only on account of the uses proposed which are considered 'less vulnerable' within the NPPF, but also on account of the fact that the finished flood levels will be set no lower than 2.5m AOD which is over 0.4m higher than the '1000' years flood level. As only a small element of the site, which will simply be used for hard standing is within the higher flood risk zones, it is considered that there is no need to apply the sequential test to flood risk in this instance.
- 10.3 Policy GEN9 requires that planning applications that will materially increase foul and/or surface water discharges will be refused unless the Local Planning Authority is satisfied that either adequate drainage capacity exists or appropriate drainage capacity can be provided as part of the development. Policy GEN9 also requires that consideration is given to the use of SUDS as an alternative to conventional drainage. In terms of drainage, SUDS will be used to ensure that the development does not increase flood risk elsewhere as the storm water discharge rate will be limited to existing levels.

11.0 ARCHAEOLOGY

- 11.1 The site is located on an area that is known to be potentially archeologically sensitive. However, as discussed above the site benefits from planning permission for development, and as part of this permission a written scheme of investigation has been agreed. The written scheme of investigation has been submitted in support of this planning application in order that the archaeological works can be secured via condition.

12.0 ECOLOGY AND TREES

- 12.1 An extended phase 1 habitat survey, badger survey and tree assessment for bats has been undertaken by PJC.
- 12.2 The site is found to be of low ecological value. No suitable habitat for breeding great crested newts were present on site. A reptile survey was carried out in September 2013, and no reptiles were recorded. Similarly no bats or evidence of bats were recorded during the tree inspections.
- 12.3 The report recommends a condition requiring supervision of trees or scrub clearance if it is to be undertaken inside the bird nesting season. No badger sett was recorded on site, however, a [REDACTED] was recorded midway along the southern boundary, indicating the use of the site by [REDACTED] in the local area. With the absence of badger setts on the site, it is concluded that the site is not constrained by badgers.
- 12.4 Potential ecological enhancements recommended within the report include the use of native species within landscaping schemes and the installation of bat and bird boxes on site. By ensuring that the proposals will not have a detrimental ecological impact, and the provision of ecological enhancements, the proposal is considered to accord with the provisions of section 11 of the NPPF.

13.0 ECONOMIC DEVELOPMENT

Economic Growth and Planning Policy

- 13.1 This section provides an overview of the importance of economic growth and specifically job creation for the economy. This chapter serves to demonstrate the employment and training benefits that could be delivered by the proposal if planning permission is granted.

National Context

- 13.2 Sustainable economic growth is an important aim of national planning policy, contained within the National Planning Policy Framework (NPPF). Paragraph 19 of the NPPF states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth: "planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system." The Chandlers component of the application is not the only form of important employment creation proposed. Retail is recognised as an important form of economic growth and job creation.

Retail Jobs

- 13.3 The Retail Sector has been subject to a select committee inquiry by the Department for Innovation and Business (BIS): The BIS Retail Strategy (October 2012) emphasises the importance of retail to local economies; "local economies are underpinned by retail as a provider of employment, skills development and the goods and services people need and want. Where there is retail there is a multiplier effect for other consumer facing enterprises..." (page 7)
- 13.4 The BIS submission to the inquiry found that around 3 million people work in retail (1 in 10 of the working population) with employment more flexible than is the case in most other sectors. 50% of retail employees work in sales and

customer-facing roles, 18% in managerial or executive positions. Retail provides employees with broad career and development opportunities across all level and parts of the companies concerned. It provides flexible working opportunities (56% of retail employees work part time) for those caring for children or other dependents; who are studying; whose religious observances require certain working hours; or whose health prevents full-time working and who would in many other sectors, have been compelled to leave work. It acts as a gateway to employment (or re-employment) to the long-term unemployed and those returning to work after life changes.

- 13.5 Retail is a key sector of the UK economy. In 2011 the sector generated around £71billion in gross value added (GVA), representing around 5% of the total of the UK economy (BIS Retail Sector Overview April 2013). Retail is comparatively more labour intensive than other sectors of the UK economy. A high proportion of the labour force are women who work part time, while a third of employees are under 25 years of age (Skillsmart quoted in BIS April 2013). Retail employment has particularly strong local benefits. In general, retail employees commute relatively short distances, so a high proportion of jobs go to local residents.
- 13.6 Retail jobs are particularly beneficial for target groups that can otherwise suffer exclusion from labour markets and experience significant economic deprivation. Retail is an especially important source of employment for young people and school leavers, particularly those who leave school with few formal qualifications. Youth unemployment – the number of young people not in Education, Employment or Training (NEET) has risen significantly as a result of the recession. Unemployment at this age is especially damaging and can have long term impact on a young person's career prospects and confidence. Entry level employment and, crucially, entry level employment accompanied by training, can help to prevent young people from slipping through the gap between education and employment.
- 13.7 The value of retail jobs are recognised as being equal to jobs such as B use classes as made clear in an increasing number of planning decisions issued by the Secretary of State (e.g. proposed Tesco store at Farringdon, Oxfordshire - APP/V3120/A/10?2143419, proposed Sainsbury's store at Bognor Regis -

APP/C3810/V/09/2117516) and more recently a proposed Asda at Hayes (APP/R/5510/A/12/2/74884).

Job Creation

- 13.8 Development and regeneration do not automatically have local impacts on employment. The nature of the jobs created, the local labour market and the recruitment and management decisions of the occupant all create variability of employment outcomes.
- 13.9 Chandlers BMW/MINI is a significant employer within Arun District, currently providing almost 90 equivalent full time jobs on their four sites. The proposed development would seek to expand the firm's operations and therefore create additional opportunities for employment, as well as ensuring that the existing 90 jobs are not relocated outside the District. The new facility is estimated to result in a further 20 additional full time jobs owing to increased workloads. The following table provides a breakdown of the existing jobs resulting from the Chandlers BMW/MINI operation.

Job Role		Existing	Proposed
Technical	Technicians	13	15
	Apprentices	2	5
	Admin	8	10
Sales Executives	MINI/BMW	12	15
Admin/Reception	MINI/BMW	6	8
Drivers/Support Staff/ Site Logistics	MINI/BMW	6	9
Parts	MINI/BMW	6	7
Management	MINI/BMW	12	13
Bodyshop Technicians	MINI/BMW	5	6
Bodyshop Admin	MINI/BMW	4	5
Part Time Drivers	MINI/BMW	6	7
Dealership Support	MINI/BMW	8	10
Totals		88	110

13.10 Chandlers are a local firm, committed to both employment provision and education and training. The company currently employ 2 apprentices who are training for NVQ equivalent qualification through the BMW UK scheme. These will be expanded to 5 apprenticeships in the new facility showing a clear commitment to education and training.

13.11 In respect of retail jobs, on the basis that the occupiers of the units are not yet known it is not possible to predict accurately the number of jobs and training opportunities that will be provided. The proposed floorspace could create 103 FTE jobs based on employment density guidelines for A1 retail use (Homes and Communities Agency 2010).

Construction

13.12 It is anticipated that during the construction phase of the development, there will be a significant demand for both skilled and unskilled labour, which may offer opportunities for local people to return to employment and/or pick up new skills and pathways to training.

Conclusions

13.13 This section of the planning statement has highlighted the substantial contribution the application proposal could bring to the local economy in terms of job creation if the planning permission is granted.

14.0 CONCLUSIONS

- 14.1 The scheme has been assessed against the development plan, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and relevant material considerations. On the basis of this assessment it is concluded that the proposals comply with the development plan and therefore, in accordance with the NPPF, should be approved without delay. The NPPF holds that Local Planning Authorities should seek to approve applications for sustainable development where possible and that Local Planning Authorities should work pro-actively with applicants to secure developments that improve the economic, social and environmental conditions of the area.
- 14.2 The proposals will enable a local firm to stay in the District and grow its operations, to increase jobs, as well as provide a modern new facility that will be a flagship development for Arun District. Chandlers has reviewed alternative sites for their new facility and despite trying for a number of years, has been unable to locate an acceptable alternative site within existing permitted or allocated floorspace or devise a solution based on reuse of existing commercial premises.
- 14.3 The application site benefits from planning permission, however, as a certificate has not been obtained in relation to the commencement of development, the pre-application advice from Arun District Council indicates that the permission has expired. In any event this planning history is a relevant material consideration in the determination of this application. In addition to the car showroom the provision of retail facilities will make efficient use of the land, and also increase consumer choice and retain expenditure within the District. The rationale for the retail element is to support the infrastructure costs of the car showroom use, however, it is considered that the application proposal is acceptable on its own merits. The majority of the floorspace proposed, has already received planning permission, albeit on the adjacent retail park.
- 14.4 As well as creating new jobs, the application proposal will ensure the future of Chandlers within the District. Chandlers require a new facility to be built and operating by 2015. If Chandlers are unable to occupy the application site, they will be forced to seek premises outside of Arun District to ensure the future

success of their business. In retail terms there is a good deal of demand from food retailers that are not currently represented in the catchment area, which require a unit of the size proposed as part of this application. As detailed elsewhere permission already exists for the non-food floorspace on the adjacent retail park, developing this floorspace on the application site is preferably from a planning perspective and from a commercial perspective.

- 14.5 It is emphasised that planning permission in this vicinity has been granted for car showroom and ancillary facilities development, and also for the majority of the floorspace proposed. Whilst the application has been assessed in its totality, only the retail floorspace proposed for food retailing represents development that has not recently been granted permission.
- 14.6 The proposal is considered to be acceptable in regard to each of the relevant policies that are consistent with the NPPF, providing high quality and sustainable forms of development that will not cause harm to amenity or cause significant adverse traffic impact. The application documentation in support of the planning application has suggested a number of planning conditions that would be acceptable to ensure that the proposals comply with the development plan.

Cgms
www.cgms.co.uk



**Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development
Management Procedure) (England) Order 2010 (as
amended)**

Application for Planning Permission

DECISION NOTICE

Application Ref: LU/47/11/

1 To Addressee

Mr Gardiner
WYG Planning & Design
The Loft
St Clairs Farm
Wickham Road
Droxford, Hampshire
SO32 3PW

2 Site Address

Land north of
Toddington Lane

BN17 7PP

3 Description of Development

Outline application with some matters reserved for mixed use development comprising: demolition of existing buildings and structures, up to 1,260 residential dwellings (out of a potential 1,460 dwelling masterplan), up to 13,000 sqm of B1 employment floorspace (including 3,000 sqm Enterprise Centre), up to 3,500 sqm of Class A local facilities, a 100 bed hotel, 60 bed care home, a new 2 Form Entry primary school, community centre, youth and leisure facilities, combined heat & power plant, extension to existing household recycling centre, landscaping, replacement and additional allotments, multi-functional green infrastructure including sports pitches (& associated changing facilities), informal open space, children's play areas, primary vehicular access from a new access from the A259 bridging over the railway line with additional access from Mill Lane & Toddington Lane. This application is the subject of an Environmental Impact Assessment & a departure from the development plan. This application affects a public right of way.

4 In pursuance of their powers under this Act and related Orders and Regulations the Council **PERMIT** this development to be carried out in accordance with the application and plans .

- 1 Details of the appearance, landscaping and layout, (hereinafter called 'the reserved matters') for each phase or sub phase shall be submitted to and approved in writing by the Local Planning Authority before any development in that phase or sub phase begins and the development shall be carried out as approved.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

- 2 Application for approval of the reserved matters for the first phase or sub phase shall be made to the Local Planning Authority not later than five years from the date of this permission. Applications for reserved matters for the remaining phases shall be made within 13 years from the date of this permission.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

- 3 The development hereby permitted shall begin not later than two years from the date of approval of the first of the reserved matters to be approved.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the town and Country Planning Act 1990 (as amended).

- 4 The planning permission relates to the following approved plans:

GR.L-002 Rev A. (North Littlehampton Illustrative Masterplan)
 GR.L-004 Rev A (Red Line Plan)
 GR.L-005 (Ownership Areas Plan)
 GR.L-006 Rev A (Parameter Plan - Uses)
 GR.L-008 Rev A (Parameter Plan - Vertical Alignment)
 GR.L-009 Rev A (Parameter Plan - Horizontal Alignment)
 GR.L-010 Rev A (Parameter Plan - Vehicular Access)
 GR.L-011 Rev A (Parameter Plan - Play and Fitness Routes)
 GR.L-014 Rev B (Parameter Plan - Pedestrian and Cycle Access)

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Policy GEN7 of the Arun District Local Plan.

- 5 The details referred to in condition 1 for each phase or sub phase shall include details of the materials and external finishes of the buildings, surfaces for roads/footpaths, earth remodelling, means of enclosure and the parking of vehicles, and the provision of samples of such materials and finishes as required. Development shall be carried out in accordance with the approved details unless otherwise agreed with the Local Planning Authority.

Reason: To enable to the Local Planning Authority to control the development in detail in the interests of amenity in accordance with Policy GEN7 of the Arun District Local Plan.

- 6 The development hereby permitted shall not be carried out except in substantial accordance with the illustrative masterplan drawing number GR.L-002 Rev A ('the Masterplan'), and the Design and Access Statement incorporating Design Guidance dated February 2011.

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Policy GEN7 of the Arun District Local Plan.

7

The appearance, landscaping and layout particulars to be submitted in accordance with Condition 1 for any phase or sub phase shall include (insofar as they are relevant to that phase or sub-phase):

- i. The detailed layout of the site including the delineation of the precise boundaries of the sites reserved for the waste management centre, primary school, community centre, allotments, youth facility, and CHP plant in the relevant phases;
- ii. The siting, design and external appearance of the buildings;
- iii. A full arboricultural survey to accompany each phase or sub phase of proposed development;
- iv. The detailed design of the southern section of the Lyminster bypass, including associated levels, profiles, culverts, lighting and street furniture, including a scheme for inclusion of public art. The lighting and street furniture should be of a design and specification which reflects the 'gateway' appearance and function of the new road and could constitute public art;
- v. The detailed design of the works required for the closure of the Toddington Lane level crossing, including the footbridge, fencing and other accommodation works (such closure being subject to the outcome of a separate legal closure process);
- vi. The detailed design of the works required for the closure of the Norway Lane level crossing including fencing and other accommodation works (such closure being subject to the outcome of a separate legal closure process);
- vii. The detailed design of the flood compensation measures including the wetland, including levels and profiles and a programme for construction;
- viii. Details of recycling facilities;
- ix. The detailed design of the Community Centre, Primary School, Youth Facility, CHP plant building;

Reason: In the interests of amenity and of the environment of the development in accordance with Policy GEN7 of the Arun District Local Plan.

8

In respect of each phase or sub phase of the development hereby permitted, reserved matters applications shall include a design statement. Each design statement shall demonstrate how the objectives of the approved Design and Access Statement incorporating the Design Guidance dated February 2011, will be met and confirm details in respect of;

a) The character, mix of uses and density established through the parameter plans at the outline stage to include the block principles and the structure of public spaces;

b) The street hierarchy, including the principles of adopting highway infrastructure, and typical street cross-sections;

c) How the design of the streets and spaces takes into account mobility and visually impaired users;

d) Block principles to establish use, density and building typologies. In addition, design principles including primary frontages, pedestrian access points, fronts and backs and perimeter of building definition;

e) Key groupings and other key buildings including information about height, scale, form, level of enclosure, building materials and design features;

f) Details of the approach to vehicular parking across the entire site for each building type, including details of a design approach;

g) Details of the approach to cycle parking for all uses and for each building type, including the distribution (resident/visitor parking and location in the development), type of rack, spacing and any secure or non-secure structures associated with the storage of cycles.

h) The approach to the character and treatment of the structural planting to the development areas;

i) The conceptual design and approach to the sustainable drainage management and how this is being applied to the built-up area to control both water volume and water quality including specification of palette of sustainable drainage features to be used, and planting strategies to enhance biodiversity.

j) The conceptual design and approach of the public realm to include public art, materials, signage, utilities and any other street furniture.

k) The conceptual design and approach to the lighting strategy and how this will be applied to different areas of the development with different lighting needs, so as to maximise energy efficiency, minimise light pollution and avoid street clutter;

l) Details of waste and recycling provision for all building types and recycling points.

m) Measures to demonstrate how opportunities to maximise resource efficiency and climate change adaptation in the design of the development will be achieved through external, passive means, such as landscaping, orientation, massing, and external building features;

n) Conceptual designs and approach to the treatment of the public realm at the central wetland (including the bridge crossing), Neighbourhood Centre, Community Hub area, primary school and youth facility are required to be submitted to the local planning authority for approval prior to the

commencement of any development within the phase that these facilities are sited.

Each phase or sub phase of the development hereby permitted shall be carried out in accordance with the approved design statement for that phase or sub-phase.

Reason: To enable the Local Planning Authority to exercise comprehensive control over the details of the proposed development in accordance with Policy GEN7 of the Arun District Local Plan.

- 9 The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) dated February 2011 and the following mitigation measures detailed within the FRA:

- Compensatory flood storage shall be provided on/or in the vicinity of the site to the design flood levels specified within the approved FRA;
- Finished floor levels shall be set no lower than 500mm above the design flood level within the approved FRA.

Reason: To prevent and reduce the risk of flooding to the proposed development, future occupants and elsewhere by ensuring that compensatory storage of flood water is provided in accordance with national guidance and Policy GEN11 of the Arun District Local Plan.

- 10 No development shall begin until a fully detailed surface water drainage scheme for that phase of the development, based on sustainable drainage principles and designed in accordance with the SUDS strategy for the whole development, has been submitted to and approved in writing by the Local Planning Authority. It should be demonstrated how each detailed scheme will contribute to delivering, and link into, the surface water drainage strategy for the site as a whole.

- The SUDS shall be designed to attenuate the 1 in 100 year storm event (plus climate change allowance of 30% in accordance with DEFRA's National Standards for Sustainable Drainage Systems).
- No infiltration of surface water drainage shall occur within ground affected by contamination unless suitable remediation is undertaken.
- Each detailed scheme should include a timetable for its implementation; and provide a management and maintenance plan in the form of a site specific Maintenance Manual for the SUDS system for the lifetime of the development. This shall include the arrangements for adoption by any public authority or statutory undertaker or details of the financial management of the scheme throughout its lifetime.

Elements of the scheme serving any particular phase shall subsequently be implemented in accordance with the approved details (unless otherwise agreed with the Local Planning Authority) prior to the occupation of any dwellings in that phase and no building in that phase of the development shall be occupied until the surface water drainage scheme has been fully implemented in accordance with the approved details.

Reason: To ensure that the proposed development is satisfactorily drained to prevent the increased risk of flooding, and improve and protect water quality, habitat and amenity, and ensure future maintenance of these in accordance with national guidance and policies GEN7, GEN9 of the Arun District Local Plan.

- 11 The development shall not commence until such time that arrangements for the future access to and maintenance of any watercourse or culvert (piped watercourse) crossing or abutting the site has been submitted and approved in writing by the Local Planning Authority.

No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities of any watercourse on or adjacent to the site.

Reason: To ensure that the proposed development is satisfactorily drained to prevent the increased risk of flooding, and improve and protect water quality, habitat and amenity, and ensure future maintenance of these in accordance with national guidance and policies GEN7, GEN9 of the Arun District Local Plan.

- 12 The development shall not commence until formal consent has been approved in writing from the Local Planning Authority for the discharge of any flows to watercourses, or the culverting, diversion, infilling or obstruction of any watercourse on the site.

Reason: To ensure that the proposed development is satisfactorily drained to prevent the increased risk of flooding, and improve and protect water quality, habitat and amenity, and ensure future maintenance of these in accordance with national guidance and policies GEN7, GEN9 of the Arun District Local Plan.

- 13 Before each phase or sub phase of the development hereby permitted is commenced details of a proposed foul drainage system shall be submitted to and approved in writing by the Local Planning Authority (including details of its siting, design and subsequent management/maintenance, if appropriate) and no dwelling in that phase of development shall be occupied until works for the disposal of sewage have been fully implemented in accordance with the approved details.

Reason: To ensure adequate infrastructure is provided to enable the scheme to be satisfactorily drained. The site lies on the Upper Chalk, a Principal Aquifer and requires protection against contamination from any proposed development in accordance with national guidance and Policy GEN26 of the Arun District Local Plan.

14

The landscaping and layout particulars to be submitted in accordance with Condition 1 for any phase or sub phase shall include:

- i. Details of all existing trees and hedgerows on the land, showing which are to be retained and which removed;
- ii. Details of the positions, height, design, materials and type of boundary treatment to be provided;
- iii. Details of any proposed alterations in existing ground levels, and of the position of any proposed excavation, within the crown spread of any retained tree.
- iv. The detailed landscape design for the development including the layout and design of the public realm within the development.
- v. Details of the play areas, fitness trail, sports pitches and public open spaces including the detailed design of the changing facility and associated car park, the detailed layout and specification for construction of the sports pitches including any boundary fencing, details of play area and fitness trail equipment, and a phasing plan for the provision of all the above.
- vi. Details of the surfacing, lighting, and signage of all footpaths, cycle routes and the fitness trail, and a phasing plan for their provision;

No hedge or tree shall be felled, uprooted or otherwise removed before, during or after the construction period except where removal is indicated on a plan approved by the Local Planning Authority.

Reason: In the interests of amenity and of the environment of the development in accordance with Policy GEN7 of the Arun District Local Plan.

15

a. Prior to the commencement of development or other operations likely to affect trees being undertaken on site a scheme for the protection of the retained trees produced in accordance with BS5837 (Trees in Relation to Construction 2005: Recommendations), which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site, shall be submitted to and approved in writing by the Local Planning Authority. No development or other operations shall take place except in complete accordance with the approved protection scheme.

b. No operations affecting trees shall be undertaken on site in connection with the development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and/or widening of any operations involving the use of motorised vehicles or construction machinery) until the protection works required by the approved protection scheme are in place.

c. No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within any area designated as being fenced off or otherwise protected in the approved scheme.

d. Protective fencing shall be retained intact until completion of the phase or sub phase hereby approved and shall not be removed or re-positioned without the prior written approval of the Local Planning Authority.

Reason: In the interests of amenity and of the environment of the development in accordance with Policy GEN7 of the Arun District Local Plan.

- 16 Landscaping (hard and soft) shall be carried out in accordance with the approved details. All planting, seeding or turfing comprised in the approved details shall be carried out in the first planting and seeding seasons following the first occupation of each phase or sub phase of the development hereby permitted or the completion of the development, whichever is the sooner, and any trees or plants which within a period of 5 years from the completion of the phase or sub phase die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.
- Reason: In the interests of amenity and of the environment of the development in accordance with Policy GEN7 of the Arun District Local Plan.
- 17 Prior to the submission of any reserved matters applications, a scheme shall be submitted for the creation of the proposed central wetland area and the restoration of habitat onsite. The scheme shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed as set out in the approved scheme and any subsequent amendments shall be agreed in writing with the Local Planning Authority.
- Reason: This condition is necessary to ensure the delivery of the mitigation proposed within tables 8.10 and 8.11 of the submitted Environmental Statement as mitigation for the proposed development. This is supported by national guidance and Policies GEN23 and GEN29 of the Arun District Local Plan.
- 18 No development shall begin until a scheme, including details of bridges (including the one crossing the proposed wetland area) and buffer zones to onsite watercourses, has been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed as set out in the approved scheme and any subsequent amendments shall be agreed in writing with the Local Planning Authority. The scheme shall include:
- Details demonstrating that bridge design will not impede flood flow routes or reduce the capacity of the flood plain.
 - All bridges shall be clear spanning structures.
 - Details of buffer zones around all wetland areas and watercourses.
- Reason: To prevent flooding elsewhere by ensuring that flood flow routes and floodplain capacity is maintained and to maintain the river corridor and allow the movement of associated wildlife in accordance with national guidance, Policy GEN11 and Policy GEN23 of the Arun District Local Plan. This condition is necessary to ensure that the mitigation proposed within tables 8.10 and 8.11 of the submitted Environmental Statement is implemented.
- 19 Development shall not begin until further ecological surveys have been carried out and submitted to the Local Planning Authority. These surveys shall relate to water voles, bats, birds, invertebrates and reptiles.
- Reason: In order to secure adequate habitat enhancement and mitigation of potential impacts of the development.

20

No development shall begin until an ecological management plan is submitted and approved in writing by the Local Planning Authority. Thereafter the plan shall be implemented as set out in the approved scheme and any subsequent amendments shall be agreed in writing with the Local Planning Authority. The scheme shall include:

- Details for the management and maintenance of all public landscaped areas, taking into account the presence of protected species.
- A monitoring scheme to assess habitat change and details of how this will inform the ongoing management and protection plan for habitats and protected species.
- Details of appropriate mitigation in relation to water voles, bats, birds, invertebrates and reptiles.

Thereafter, the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be approved in writing by the Local Planning Authority.

Reason: This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site in line with national guidance and Policy GEN23 and GEN29 of the Arun District Local Plan (2003). In particular this will ensure adequate protection for Water Voles and their habitat, a protected species and deliver the mitigation proposed within tables 8.10 and 8.11 of the submitted Environmental Statement is implemented.

21

No development within any phase or sub phase shall commence until details of an ecological management plan for the construction phase of that element of the development has been submitted to and approved in writing by the Local Planning Authority. The management plan shall be implemented in accordance with the approved plans.

Reasons: In order to secure adequate habitat enhancement and mitigation of potential impacts of the development.

22

No development shall take place within any phase or sub phase, including any works of demolition, until a Construction Method Statement for that phase has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

- i. the parking of vehicles of site operatives and visitors;
- ii. loading and unloading of plant and materials;
- iii. storage of plant and materials used in constructing the development;
- iv. the erection and maintenance of security hoarding;
- v. the traffic management to be used by construction vehicles to enter and exit the site;
- vi. measures to control the emission of dust and dirt during construction;
- vii. a scheme for recycling/disposing of waste resulting from demolition and construction works;
- viii. building, engineering and other operations to be carried out only between the hours of 0800 and 1800 Monday to Friday, 0800 to 1300 Saturdays and shall not be carried out at any time on Sundays or Public Holidays;
- ix. noise and vibration controls.

Development shall be carried out in accordance with the approved Construction Method Statement.

Reason: In the interests of amenity in accordance with Arun District Local Plan policies GEN7 and GEN32.

- 23 Prior to development of any phase or sub phase commencing, full details of the construction compound within that phase or sub phase, including arrangements for turning delivery vehicles and areas set aside for construction staff parking, shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.
- Reasons: In the interests of amenity in accordance with Arun District Local Plan Policy GEN7.
- 24 Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.
- Reason: To protect the Principal Aquifer beneath the site, the groundwater abstraction on site and the surface waters including the Black Ditch in accordance with PPS23 and Policy GEN26 of the Arun District Local Plan. If used, piling can provide direct pathways for contaminants to groundwater.
- 25 Prior to construction within any phase or sub phase of development, vehicle wheel cleaning facilities and a highway cleaning strategy shall be submitted to and agreed in writing by the Local Planning Authority. All construction vehicles involved in constructing or building the development exiting the site shall have all tyres and wheels cleaned before entering the highway.
- Reason: In the interest of good practice and to ensure that impacts from the construction phase of the development are reduced.
- 26 Before each phase or sub phase of the development hereby permitted is commenced, details of the layout and specification of and construction programme for the roads, footpaths, cycleways and parking areas, including tracking details for heavy goods vehicles and refuse vehicles, for that phase shall be submitted to and approved in writing by the Local Planning Authority. No dwelling or commercial building shall be occupied until it is provided with access constructed in accordance with such approved details to the highway network.
- Reasons: In the interests of road safety and to accord with approved policy in accordance with Policy GEN7 of the Arun District Local Plan.
- 27 No dwelling shall be occupied until refuse and recycling bins have been provided and space has been laid out for their storage in relation to that dwelling in accordance with details that shall have been submitted to and approved in writing by the Local Planning Authority. Thereafter these areas shall not be used for any purpose other than the storage of refuse and recycling bins.
- Reason: In the interests of the amenity of occupiers of nearby properties in accordance with Arun District Local Plan Policy GEN7 and DEV26.
- 28 No dwelling shall be occupied until space for that dwelling has been laid out for the parking of cars, motorcycles and cycles in relation to that dwelling in accordance with a drawing and schedule to be submitted to and approved in writing by the Local Planning Authority. These areas shall thereafter not be used for any purpose other than the parking of cars, motorcycles and cycles.
- Reason: In the interests of road safety and to accord with approved policy in accordance with Policy GEN7 of the Arun District Local Plan.

- 29 Garages provided on the site shall measure a minimum of 6m x 3m internally.
- Reason: To ensure that adequate and satisfactory provision is made for the parking (and garaging) of vehicles clear of all highways in accordance with Policy GEN7 of the Arun District Local Plan.
- 30 No phase or sub phase of the development hereby permitted shall be commenced until a scheme for the location and installation of fire hydrants within that phase has been submitted to and approved in writing by the Local Planning Authority. For the purposes of this condition each scheme shall be in accordance with the Guidance Note: The Provision of Fire Hydrants and an Adequate Water Supply for Fire Fighting as published by West Sussex Fire and Rescue Services (as amended from time to time). No building hereby permitted shall be occupied until the fire hydrant(s) required to serve that building have been installed in accordance with the approved scheme.
- Reason: In order to provide adequate infrastructure for emergency services.
- 31 At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low carbon energy sources (as described in the glossary at Annex 2 of the National Planning Policy Framework, March 2012). Details and a timetable of how this is to be achieved for each phase or sub phase of development, including details of physical works on site, shall be submitted to and approved in writing by the Local Planning Authority before any development in that phase or sub phase begins. The development shall be implemented in accordance with the approved details and timetable and retained as operational thereafter, unless otherwise agreed in writing by the Local Planning Authority.
- Reason: In order to secure on site renewable energy in accordance with national planning policy.
- 32 Before the construction of any non-residential building hereby permitted is commenced details of how the building will achieve a 'very good' rating pursuant to the Building Research Establishment Environmental Assessment Method shall have been submitted to and approved in writing by the Local Planning Authority. Unless otherwise approved in writing by the Local Planning Authority, no part of any non-residential building hereby permitted shall be occupied until a copy of a post-construction completion certificate, verifying that that building has achieved a 'very good' rating, has been submitted to the Local Planning Authority.
- Reason: In order to secure a sustainable development.

33

No development approved by this planning permission shall commence (or such other date or stage in development as may be agreed in writing with the Local Planning Authority) until the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

i. A preliminary risk assessment which has identified:

- All previous uses
- Potential contaminants associated with those uses
- A conceptual model of the site indicating sources, pathways and receptors
- Potentially unacceptable risks arising from contamination at the site

ii. A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

iii. The results of the site investigation and detailed risk assessment referred to in (ii) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

iv. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (iii) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To protect the Principal Aquifer beneath the site, the groundwater abstraction on site and the surface waters including the Black Ditch in accordance with PPS23 and Policy GEN26 of the Arun District Local Plan.

34

A verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a long-term monitoring and maintenance plan) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the Local Planning Authority. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To protect the Principal Aquifer beneath the site, the groundwater abstraction on site and the surface waters including the Black Ditch in accordance with national guidance and Policy GEN26 of the Arun District Local Plan.

35 If, during development, contamination not previously identified is found to be present at the site then no further development of the affected area (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved.

Reason: To protect the Principal Aquifer beneath the site, the groundwater abstraction on site and the surface waters including the Black Ditch in accordance with national guidance and Policy GEN26 of the Arun District Local Plan. There may be areas of the site, which cannot be fully characterised by a site investigation and unexpected contamination may be identified.

36 Prior to the commencement of construction of the Lyminster by-pass southern section, details of the acoustic barrier (as defined by Figure 10.10 of the submitted Environmental Statement dated February 2011) shall be submitted to, and approved in writing by, the Local Planning Authority. The approved scheme shall be implemented in accordance with approved details and thereafter permanently maintained.

Reason: In the interests of amenity, in accordance with Arun District Local Plan Policies GEN7 and GEN32.

37 In addition to the measures described in Condition 36 above, any development on land within Noise Exposure Category C and D shall incorporate noise mitigation measures details of which are to be submitted to, and approved in writing by, the Local Planning Authority. These measures shall thereafter be permanently maintained.

Reason: In the interests of amenity, in accordance with Arun District Local Plan Policies GEN7 and GEN32.

38 All ground level private amenity spaces shall have a predicted noise level of less than or equal to LAeq, 55dB (measured over a 1 hour period) within the first 5 metres from the building facade.

Reason: To safeguard the amenities of residents in accordance with Arun District Local Plan policies GEN7 and GEN32.

39 Before the development hereby permitted is commenced a scheme for the provision of bus stops within the site shall have been submitted to and approved in writing by the Local Planning Authority. For the purposes of this condition the scheme shall include a programme for provision of real time passenger information-ready bus stops. The development shall not be carried out otherwise than in accordance with the approved scheme unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of road safety and sustainable development.

- 40 Archaeological investigations of the site shall be carried out for each phase or sub phase of the development at the expense of the developer in accordance with a specification to be submitted to and agreed by the Local Planning Authority in writing. The archaeological investigations shall be carried out following the demolition of existing buildings and before the commencement of new building works in each phase or sub phase of the development. This shall include (as necessary):
- Geophysical surveys, test pits and trenches in the areas currently occupied by existing structures, and,
 - Borehole surveys conducted within the grazing marshes to the south of the Black Ditch and to the north of the development area.
- Reason: In order to ensure that archaeological features on the site will be properly recorded before development.
- 41 The Local Planning Authority shall be informed in writing immediately of any items of archaeological interest unearthed during the building operation and given a reasonable opportunity for an examination of the artefact and the site where it was found.
- Reason: To enable items of archaeological interest to be recorded in accordance with the policy AREA 17 of the Arun District Local Plan.
- 42 No more than 350 dwellings in the development hereby permitted shall be occupied until the completion and opening to public traffic of the improvements to A27/A284 Ford Road roundabout shown on drawing number WYGLITTLEHAMPTON.1/41 Rev B (or such other scheme of works substantially to the same effect, as may be approved in writing by the local planning authority (who shall consult with the Highways Agency on behalf of the Secretary of State for Transport)).
- Reason: In the interests of road safety.
- 43 No more than 350 dwellings in the development hereby permitted shall be occupied until the completion and opening to public traffic of the improvements to A27/A284 Crossbush junction shown on drawing number WYGLITTLEHAMPTON.1/42 Rev A (or such other scheme of works substantially to the same effect, as may be approved in writing by the local planning authority (who shall consult with the Highways Agency on behalf of the Secretary of State for Transport)).
- Reason: In the interests of road safety.
- 44 Prior to the commencement of development, a strategy for the provision of the highest available headline speed of broadband provision to future occupants of the site shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall take into account the timetable for the delivery of 'superfast broadband' (defined as having a headline access speed of 24Mb or more) in the vicinity of the site (to the extent that such information is available). The strategy shall seek to ensure that upon occupation of a dwelling, the provision of the highest available headline speed of broadband service to that dwelling from a site-wide network is in place and provided as part of the initial highway works and in the construction of frontage thresholds to dwellings that abut the highway. Unless evidence is put forward and agreed in writing by the Local Planning Authority that technological advances for the provision of a broadband service for the majority of potential customers will no longer necessitate below ground infrastructure, the development of the site shall be carried out in accordance with the approved strategy.

45 A verification report demonstrating completion of the works set out in the following conditions shall be submitted to and approved, in writing, by the Local Planning Authority.

9 (Flood Risk Assessment),
 10 (Surface Water Drainage),
 11 (Access & Maintenance of Watercourse),
 13 (Foul Water Drainage),
 15 (Tree Protection),
 16 (Landscaping),
 17 (Central Wetland),
 18 (Buffer Zones),
 20 (Ecological Management),
 26 (Road Construction),
 31 (Renew able Energy) and
 36 (Acoustic Barrier)

The report shall include results of monitoring carried out in accordance with the approved verification plans to demonstrate that the work have been carried out in accordance with approved details. It shall also include any plan (a long-term monitoring and maintenance plan) for longer-term monitoring and maintenance as identified in the verification plan, and for the reporting of this to the Local Planning Authority. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To ensure a satisfactory standard of development in accordance with approved details.

INFORMATIVE A:

Advice regarding Condition 20: The above management and monitoring plans should provide protection of Water Vole populations and their habitats during construction works and the operational phase. The monitoring plans should, in addition to assessing habitat change, inform the management of the species and encourage water voles to migrate into the central wetland area

INFORMATIVE B:

Under the terms of the Water Resources Act 1991, and regional byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8m of the top of the bank of the Black Ditch, designated a 'main river'.

INFORMATIVE C:

Both the Norway and Toddington Ditches are Internal Drainage Board watercourses under the jurisdiction of the Environment Agency. Any works whatsoever in, over, or under the channel of these watercourses, or on their banks within 5m from the top of the channel would require the prior consent of the Environment Agency under Section 23 of the Land Drainage Act 1991 and/or Byelaws.

INFORMATIVE D:

If it is proposed to divert, obstruct or culvert a watercourse, the applicant will require the prior consent of the Environment Agency under Section 23 of the Land Drainage Act 1991. The applicant should note that in determining an application for consent, there would be a presumption against the culverting of watercourses. Therefore the Environment Agency would recommend that the applicant investigates the use of clear span structures should any site access crossings be proposed. The need for such crossings should be kept to an absolute minimum.

INFORMATIVE E:

Please note that a licence will be required from Natural England to survey for, and where any proposals are made as a last resort, to relocate legally protected species. For further information please see:

<http://www.naturalengland.org.uk/conservation/wildlife-management/licensing/genlicences.htm>

INFORMATIVE F:

Advice regarding Condition 17: This scheme should provide the details of the proposed compensation for loss of floodplain habitat and length of the Toddington ditch as well as how the proposed central wetland area shall maintain the floodplain corridor and provide links with the grazing marsh to the east. It should include detailed plans of the central wetland area including ponds and scrapes to enhance its ecological value and provide suitable habitat/mitigation for water voles. Any planting should be of native species only (ideally locally sourced) and consideration should be given to how the water quality of this area will be protected.

In addition, this scheme should include details of the Toddington ditch realignment and how it will connect with the proposed wetland area. The submitted water vole survey also highlighted the restoration of some of the dry ditches located in the floodplain as additional mitigation and these should be identified in this scheme.

The scheme should also include details of how the habitat creation/restoration will be delivered such as timescales.

INFORMATIVE G:

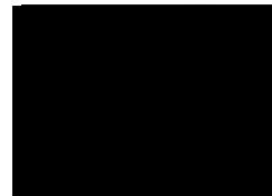
Advice regarding Conditions 11 and 18: Any works to Black Ditch, Norway Ditch and Toddington Ditch will require the consent of the Environment Agency (see below informatives). The Environment Agency carries out maintenance works on these watercourses, therefore prior discussions with the Environment Agency will be required to ensure that access arrangements are not affected.

The design of the proposed bridge over the central wetland should have a minimal impact on the wetland area itself enabling it to act as the compensation and mitigation required by the submitted Environmental Statement.

The proposed bridge over the Norway Ditch shall be a minimum of 5m from the bank top of the watercourse to provide an unobstructed corridor to allow the movements of otters and other animals. The buffer zone around the Norway Ditch should ensure that other than the bridge, no other development will occur within an 8m buffer and housing will be a minimum of 10m away.

Head of Planning Services
Arun District Council
The Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF

Date of Decision: 23 January 2013



IT IS IMPORTANT THAT YOU READ THE NOTES ATTACHED TO THIS DOCUMENT

NOTES RELATING TO PLANNING APPLICATION TOWN AND COUNTRY PLANNING ACT 1990

APPEALS TO THE SECRETARY OF STATE

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the First Secretary of State under section 78 of the Town and Country Planning Act 1990.

If this is a decision on a planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice, if you want to appeal against your local planning authority's decision on your application, then you must do so within 28 days of the date of this notice.

If an enforcement notice is served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: 28 days of the date of service of the enforcement notice, or within 6 months (12 weeks in case of a householder appeal) of the date of this notice, whichever period expires earlier.

If you want to appeal, then you must do so within 6 months of the date of this notice using a form which you can get from the Secretary of State, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN or on line at www.planningportal.gov.uk/pcs

The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

PURCHASE NOTICES

If either the local planning authority or the Secretary of State refused permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the Council (that is, where the land is situated in a National Park, the National Park authority for the Park, or in any other case the district council in whose area the land is situated).

This notice will require the Council to purchase the owner's interest in the land in accordance with the provisions of Chapter 1 of Part VI of the Town & Country Planning Act 1990.

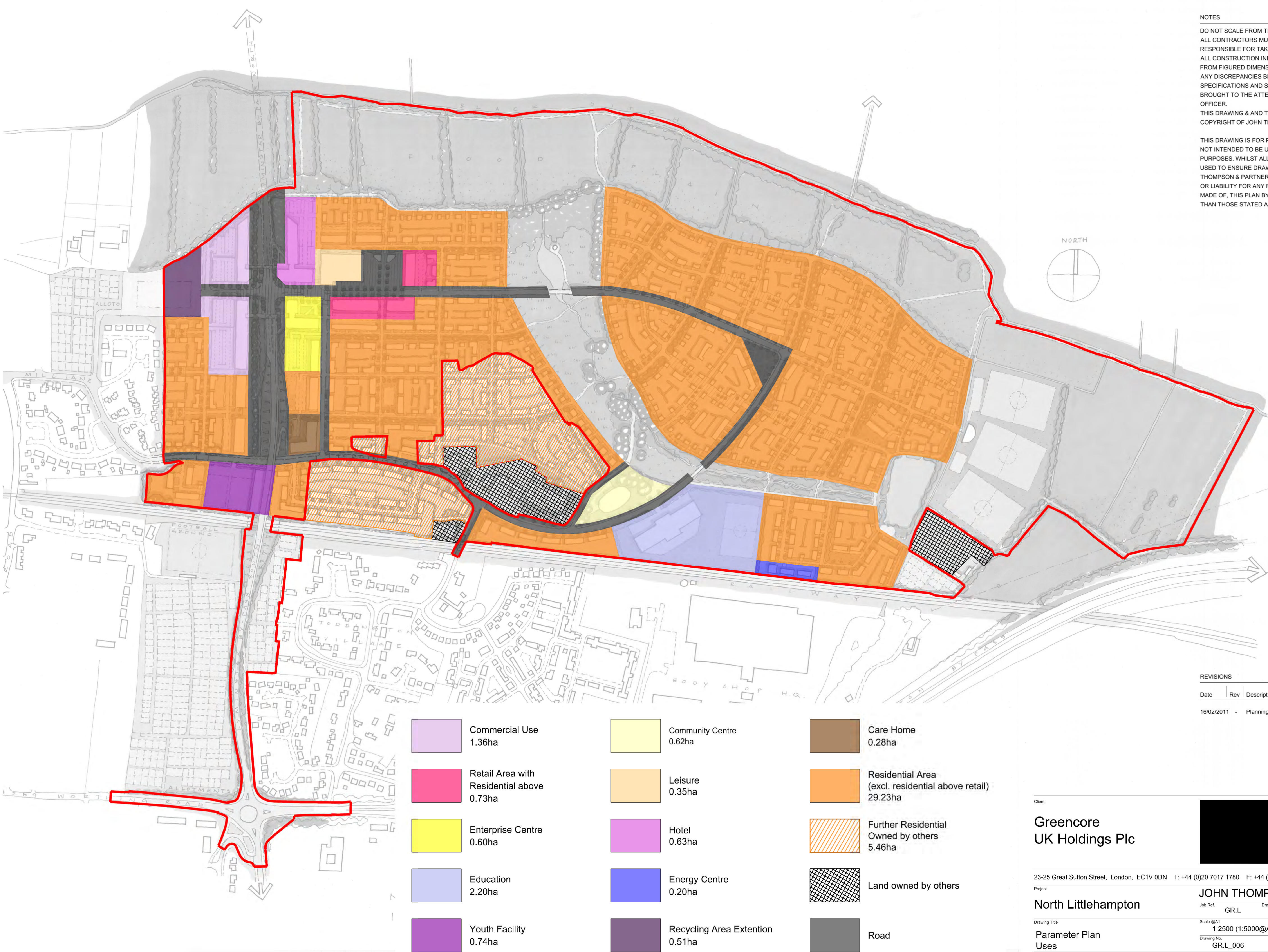
Please note that this decision notice only relates to matters under the Planning Acts and does not give consent under any other legislation that may apply to the

development. You will need to carry out your own checks to determine whether any other consents or permissions are required. For example, the Building Regulations are likely to apply to most developments, and a Highways Licence may be required from West Sussex County Council for any development within the public highway (including the placing of skips on highway land).

NOTES

DO NOT SCALE FROM THIS DRAWING.
ALL CONTRACTORS MUST VISIT THE SITE AND BE RESPONSIBLE FOR TAKING AND CHECKING DIMENSIONS.
ALL CONSTRUCTION INFORMATION SHOULD BE TAKEN FROM FIGURED DIMENSIONS ONLY.
ANY DISCREPANCIES BETWEEN DRAWINGS, SPECIFICATIONS AND SITE CONDITIONS MUST BE BROUGHT TO THE ATTENTION OF THE SUPERVISING OFFICER.
THIS DRAWING & AND THE WORKS DEPICTED ARE THE COPYRIGHT OF JOHN THOMPSON & PARTNERS.

THIS DRAWING IS FOR PLANNING PURPOSES ONLY. IT IS NOT INTENDED TO BE USED FOR CONSTRUCTION PURPOSES. WHILST ALL REASONABLE EFFORTS ARE USED TO ENSURE DRAWINGS ARE ACCURATE, JOHN THOMPSON & PARTNERS ACCEPT NO RESPONSIBILITY OR LIABILITY FOR ANY RELIANCE PLACED ON, OR USE MADE OF, THIS PLAN BY ANYONE FOR PURPOSES OTHER THAN THOSE STATED ABOVE.



REVISIONS		
Date	Rev	Description
16/02/2011	-	Planning Application Submission

Client

Greencore UK Holdings Plc

23-25 Great Sutton Street, London, EC1V 0DN T: +44 (0)20 7017 1780 F: +44 (0)20 7017 1781 W: www.jtp.co.uk

Project

North Littlehampton

Drawing Title

Parameter Plan Uses



JOHN THOMPSON & PARTNERS

Job Ref.	GR.L	Drawn	AF/ABL	Checked By	EH
Scale @A1	1:2500 (1:5000@A3)	Date	16/02/2011	Revision	-
Drawing No.	GR.L_006				

ECE Planning Ltd
64-68 Brighton Road
Worthing
West Sussex
BN112EN

Date: 30th November 2023

Please ask for: Mr S Davis
Tel: 01903 737874

Your Ref: JW/Let/P1998
Our Ref: PAA/98/23/

Dear Mr Barker,

Pre-Application Advice

The redevelopment of the site for a food store, 2x drive thru units, together with a mix of trade counters, light industrial and storage units.

Land to the west of New Courtwick Lane Wick Littlehampton BN17 7RZ

I write regarding the above matter and your enquiry received on 13th October 2023.

SCOPE OF PRE-APPLICATION ADVICE

You seek advice on the redevelopment of the industrial site for a retail food store and two drive-thru units (east site). You propose to redevelop the former horticultural site to the west (west site) with new industrial development.

The proposal currently consists of:

East Site (2,282 m2):

- Food store (1,843m2) - 114 car parking spaces
- 2x Drive Thru (439m2) - 54 car parking spaces

West Site (6,606m2):

- Trade Counters (2,737m2) - 71 car parking spaces
- Light Industrial (1,602 m2) - 64 car parking spaces
- Light Industrial/Storage (2,267m2) - 37 car parking spaces

Access will be from New Courtwick Lane using two existing access points and these will separate movements by the proposed land use. You suggest pedestrian accesses from the west site to Courtwick Lane and between the two sites. You suggest all trees and landscape

buffers will be retained and enhanced around the site and on the north/south corridor which visually separates the East and West sites. You indicated the application is likely to come in two parts and be phased with the retail element completing first. At our meeting you suggested that a hybrid application type could be utilised to secure the detail of the retail at the same time as the principle of the industrial uses.

You specifically request advice on the following matters:

- (1) Our opinion on the principle of the proposal and the relevant technical matters.
- (2) Agreement to the scope of the retail sequential test and impact tests; and
- (3) Details of existing, committed and planned public and private investment in centres within the catchment area (Littlehampton & Rustington) of the proposal.

RELEVANT POLICIES AND GUIDANCE - the following policies are considered relevant to your proposal:

Arun Local Plan 2011-2031

<u>DDM1</u>	D DM1 Aspects of form and design quality
<u>DSP1</u>	D SP1 Design
<u>ECCSP1</u>	ECC SP1 Adapting to Climate Change
<u>ECCSP2</u>	ECC SP2 Energy and climate change mitigation
<u>EMPDM1</u>	EMP DM1 Employment Land: Development Management
<u>ENVDM1</u>	ENV DM1 Designated Sites of Biodiversity or geographical importance
<u>ENVDM5</u>	ENV DM5 Development and biodiversity
<u>INFSP1</u>	INF SP1 Infrastructure provision and implementation
<u>QEDM1</u>	QE DM1 Noise Pollution
<u>QEDM2</u>	QE DM2 Light pollution
<u>QEDM3</u>	QE DM3 Air Pollution
<u>QEDM4</u>	QE DM4 Contaminated Land
<u>QESP1</u>	QE SP1 Quality of the Environment
<u>RETDM1</u>	RET DM1 Retail development
<u>RETSP1</u>	RET SP1 Hierarchy of Town Centres
<u>SDSP1</u>	SD SP1 Sustainable Development
<u>SDSP2</u>	SD SP2 Built-up Area Boundary
<u>SKILLSP1</u>	SKILLS SP1 Employment and Skills
<u>TSP1</u>	T SP1 Transport and Development
<u>WDM2</u>	W DM2 Flood Risk
<u>WDM3</u>	W DM3 Sustainable Urban Drainage Systems

Neighbourhood Plan Policies:

<u>Littlehampton Neighbourhood Plan 2014</u>	The Presumption in Favour of Sustainable Development
<u>Policy 1</u>	
<u>Littlehampton Neighbourhood Plan 2014</u>	A Spatial Plan for the Town

[Policy 2](#)

[Littlehampton Neighbourhood Plan 2014](#)

Business Land Allocations

[Policy 7](#)

[Littlehampton Neighbourhood Plan 2014](#)

Design of New Development

[Policy 22](#)

Planning Policy Guidance:

NPPDG	National Design Guide
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

Supplementary Guidance:

SPD11	Arun Parking Standards 2020
SPD13	Arun District Design Guide (SPD) January 2021

ADVICE

PLANNING HISTORY:

There is no recent planning history, and it is clear from the site that the glasshouses have been removed such that there is no need to consider development plan policy relating to the protection of horticultural development.

CONSULTATION RESPONSES:

Full copies of the consultation responses will be emailed to you and the following are brief summaries.

ADC Environmental Health - state noise and air quality assessments will be required.

ADC Tree Officer - state no immediate concerns.

ADC Landscape Officer - state a need for additional landscaping/screening.

ADC Ecologist - note the loss of habitat for birds, reptiles, hedgehogs, and possibly bats. State there is a need to consider the impact on the Arun Valley, a need to provide a Biodiversity Net Gain (BNG) Assessment, and mitigation for habitat loss. A phase 1 habitat survey will be required along with any necessary species specific surveys.

ADC Economic Development - support industrial development but not out of centre retail.

ADC Drainage - no immediate concerns provided adequate surface water drainage supporting information is provided with the application.

POLICY CONTEXT/DESIGNATIONS:

The Development Plan consists of the Arun Local Plan 2011 - 2031 (ALP), West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The Littlehampton Neighbourhood Development Plan 2014 - 2029 (LNDP) was made in November 2014. The following policy designations/features are relevant:

- Built-Up Area Boundary (BUAB).
- Part employment allocation per the LNDP (the eastern half of the west site).
- Existing employment development (east site).
- Current/Future Flood Zone 1.
- Medium to high Groundwater risk (50%-75%).
- 1:1000 Surface Water flood risk (north/south strip on the western side of the factory).
- TPO/LU/1/99 protects 27 trees along Courtwick Lane (northern boundary).
- Within an Area of Special Advert Control.
- Archaeological Notification Area.
- CIL Zone 2; and
- Within the Arun Valley Impact Risk Zone (IRZ) (west site only).

PRINCIPLE OF DEVELOPMENT:

The relevant policies are:

- ALP policies SD SP1, SD SP2 & EMP DM1
- LNDP policies 1, 2 & 7; and
- NPPF.

The site is in the BUAB and allocated in the LNDP for employment development on half of the west site (policy 7). Even taking account of the lack of an allocation on the western half of the west site, the whole site being in the BUAB means that there is no objection in principle to the development of the whole of the west site.

Policy EMP DM1 provides protection to the existing industrial development on the east site. Part 2 of the policy states that redevelopment for non-employment purposes will not be allowed unless:

- (a) it is demonstrated that the site is no longer required and is unlikely to be re-used or re-developed for industrial/commercial* purposes.
- (b) the existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved.

* NB commercial does not include retail.

It is not considered that (b) is appropriate in this instance. You will need to demonstrate (a) and to provide evidence to demonstrate the site has not been made deliberately unviable, and that marketing has been actively conducted for a reasonable period of time (at least 6 months, preferably a year). The development of the west site for employment (industrial) uses would be a material consideration and for this reason, it is recommended that the application come in for both parts at the same time (or as a hybrid as discussed).

Our Economic Development Officer has stated they are always pleased to see investment in industrial units, Arun has an aging supply and modern units are encouraged.

RETAIL DEVELOPMENT:

The relevant policies are:

- ALP policies RET SP1 & RET DM1; and
- NPPF.

ALP policy RET SP1 states Bognor Regis and Littlehampton will be the main focus for retail, leisure, commercial, office, tourism, cultural, community and residential development. Policy RET DM1 (3) states:

"Proposals for Town Centre uses outside the centres defined on the Policies Maps will only be permitted if:

- a. The scheme meets the impact tests of the NPPF.
- b. The scheme is easily accessible by the highway network and public transport.
- c. The scheme includes provision for access by cycle and on foot.
- d. The scheme includes appropriate provision to enable access for people with disabilities.

Applicants proposing retail development on out of centre sites will demonstrate that no suitable site can be found, firstly within the existing town centre or, secondly, on the edge of the centre."

The policy sets its own impact test threshold of 1000m².

There are no concerns with criteria (b) whilst (c) & (d) will likely be met through the detail of the application. This leaves (a) as the key determining factor concerning the retail development on the east site. We have no concerns with the drive thru units, but a new food store is not welcome in this location. You are welcome to pursue this and provide us with a sequential assessment and Retail Impact Assessment (RIA). Regarding the former, you have asked for details of existing, committed and planned public and private investment in centres in the catchment area (Littlehampton & Rustington) of the proposal. We offer the following sites for consideration:

- The former Waitrose store in Littlehampton Town Centre has an extant, but almost expired, permission for a mixed-use development with retail at ground floor and residential above. This is an ideal development for Littlehampton Town Centre due to the increase in footfall such a development is likely to create. We believe the site is currently being marketed.

- Another very suitable alternative location would be land at North Littlehampton as approved by LU/417/21/OUT. Much of this site is set aside for employment uses and our Economic Development officers have said they would be pleased to discuss the potential commercial uses on this site with the applicant.

- There is also land at Water Lane in Angmering that may be suitable.

- A/39/23/PL is proposing an employment park for Use Class E(g)(ii) and B8 floorspace at Land west of Brook Lane and South of A259, Angmering. This has not yet been determined but is not a great distance from an existing food store, retail store and a car showroom.

You have asked for our initial agreement to the scope of the retail sequential test and impact tests. We have reviewed Quod's Scoping Note and raise no concerns particularly as this follows the approach taken with the Salt Box field site in Bersted. At our meeting you

requested that we seek external retail consultant advice on this to provide you with more comfort in taking the scheme forwards.

We have approached retail consultants requesting quotes for an initial review of the Scoping Note and a later review of the RIA to be submitted at application stage. We have not yet had any quotes back. The RIA review carried out for the Salt Box application in around 2019 cost around £2000. We would expect your client to bear the costs of the initial and later RIA reviews and we will write to you in due course with details of the quotes received so that the initial work can be commissioned if you agree.

TRAFFIC & ROAD SAFETY:

The relevant policies are:

- ALP policy T SP1.
- LNDP policy 22.
- Arun Parking Standards SPD.
- Arun Design Guide (ADG); and
- NPPF.

ALP policy T SP1 seeks to ensure development provides safe access on to the highway network; contributes to highway improvements (where appropriate) and promotes sustainable transport. Schemes should accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, be accessed by high quality public transport facilities, create safe and secure layouts for traffic, cyclists and pedestrians and provide appropriate levels of parking.

Whether the new access arrangements will be acceptable or not will depend on advice from WSCC Highways. We cannot consult external consultees on pre-application enquiries, and they have their own pre-application service. We note that you have already approached WSCC. Please refer to our Parking Standards SPD and the ADG as follows:

- 2,273m² Retail (class E(a)) - 1 space per 14m² = 162 spaces
- 6,606m² E(g)/B8 - depends on which use class as E(g) is 1space per 30m² and B8 is 1 space per 100m²
- WSCC would guide the whole parking strategy
- All spaces should measure 2.5m by 5m (per the ADG).
- 5% of all spaces must be accessible/disabled suitable.
- Cycle storage will also be required per the ADG.

Please also note the parking requirements in LNDP policy 22.

The new accesses and internal road layout should be designed in accordance with Local Transport Note 1/20 which sets out minimum standards when implementing new cycle infrastructure and includes, but not limited to, cycle crossings and junctions, cycle lanes, cycle tracks, cycle networks and cycle parking. This guidance is to be incorporated into our ADG (sections F.02, F.03, and F.04) and is set out on our website: <https://www.arun.gov.uk/supplementary-planning-documents-spds>.

CHARACTER, DESIGN & AMENITY:

The relevant policies would be:

- ALP policies D DM1, D SP1 & QE SP1.
- LNDP policy 22.
- National Design Guide.
- ADG; and
- NPPF.

ALP Policies D SP1 & D DM1 generally require developments to reflect the characteristics of the wider locality, particularly concerning layout, landscaping, density, mix, scale, massing, character, materials, finish, and architectural details. LNDP policy 22 encourages all planning applications submitted for major development proposals to be considered by a Littlehampton Design Assessment Panel as part of the pre-application consultations.

The ADG is predominantly focused on residential development but generally requires development to respond to the distinctiveness & characteristics of their surroundings in terms of scale, massing, and materials. Section J refers to building design and states new development must ensure the existing character and sense of place of an area is respected and enhanced. This can allow for new design forms but only where these take cues from well-designed elements of the area. Section T covers mixed & town centre uses and states:

- Ground floor frontages should incorporate active uses with inactive uses located above or to the rear. The maximum length of inactive frontage should not exceed 15 metres; and
- The height of buildings should be appropriate to context and may include taller 'landmark' buildings which provide a focal point and aid legibility.

We have no immediate concerns with the layout, design or scale as presented. The west site is already very well landscaped/screened, and this will all be retained and enhanced. The east site is presently more visible and so will the new uses however, this is not a concern. Some landscaping would be positive on the east site though.

The industrial units are likely to be functional in appearance and given the existing screening, this is acceptable. Likewise, it would be appropriate to have some higher units within the central areas of the site away from the boundaries. The retail elements would need to be more design focussed and it is recommended that these take cues from other well-designed built developments in the local area. Brick is a good starting point, but we agree that, for example, the timber elements on the Starbucks Drive Thru at Rustington Retail Park are positive.

Based on the distances to nearby dwellings shown in the present layout drawing, we have no concerns regarding loss of light or overlooking. Existing landscaping will mitigate harmful impacts. It is noted you suggest no openings on the western elevation of the industrial buildings that back onto the area of dwellings. This and the presence of the buildings themselves may mitigate noise from in the site.

TREES:

The relevant policies are:

- ALP policies D DM1 & ENV DM4; and

- ADG.

There are several TPO protected trees on the northern boundary. The layout suggests no impact on these and it is clear that our Tree Officer agrees with this assessment. You propose to retain most, if not all, of the un-protected boundary tree planting and this is positive. Any trees to be removed to enable development should be replaced on a ratio of 2:1 with new trees being of a native species and of a potential scale to correspond with the scale of any lost.

BIODIVERSITY:

The relevant policies are:

- ALP policy ENV DM5; and
- NPPF.

Given the overgrown and predominantly natural state of the west site, the biodiversity value of this is likely to be important at the local level. Nearby local residents are likely to raise such matters as objections to any planning application, so it is important to be seen to taking this matter seriously.

The west site is in the defined IRZ for the Arun Valley Special Protection Area (SPA). It may be used for foraging and resting by Bewick Swans and potentially have regional value. Our ecologist refers to potential impacts on bats, reptiles, hedgehogs and birds. We recommend the application is accompanied by a phase 1 habitat survey together with any specific species surveys should they be recommended. We note you have already commissioned some or all of this work. At our meeting we discussed the implications of national Biodiversity Net Gain (BNG) given the loss of scrub land and some areas of trees.

CLIMATE CHANGE:

The relevant policies are:

- ALP policies ECC SP1 & ECC SP2.
- ADG; and
- NPPF.

Major developments are required to produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable. Energy efficiency/building fabric measures will be taken into consideration when the total predicted energy requirements are calculated. These measures will be secured by a condition however, it is recommended that a sustainability statement be provided with the application to set out details of proposed measures.

INFRASTRUCTURE PROVISION:

The retail food store would be eligible for CIL at a current rate of £116.92/m², but our CIL regime does not set any requirements for drive thru's or industrial development. Therefore, a s106 could be sought for provisions or contributions relating to these elements. Whether this is required or not will likely depend upon advice from WSCC Highways and National Highways.

SUMMARY:

The development of the west site for employment uses is acceptable in principle and provided appropriate biodiversity mitigation and net gain is proposed, this part of the proposal would likely be supported. Likewise, we have no concerns with the 2 drive-thru units which on their own do not require impact testing. However, we would not support a new food store in this location. Your best chance of securing this (notwithstanding the sequential & impact testing requirements) is to submit the whole proposal as one (or a hybrid) so that the uplift in employment floorspace is capable of being treated as a material consideration.

FOLLOW UP MEETING

A meeting was held on the 14 November 2023. Should you require a further meeting, you will need to forward a written request quoting PAA/98/23/ with a fee for £200. You can pay on line <https://www1.arun.gov.uk/make-a-payment/start> or send a cheque made payable to Arun District Council.

MAKING AN APPLICATION

If you decide to proceed with making an application you will need to quote this pre application advice reference number PAA/98/23/ in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

You will need to provide all the plans and supporting information as indicated in the relevant Planning Validation Requirements List on our website: <https://www.arun.gov.uk/making-a-planning-application#Planningvalidation>

Based on the proposal and the site area, the following items will be required for validation:

- Application Form, Fee, Drawings.
- CIL Additional Information Form.
- Design & Access Statement.
- EIA Screening Request (ideally submitted before the application).
- Biodiversity Survey/Report.
- Biodiversity Net Gain Statement.
- Flood Risk Assessment.
- Surface Water Drainage Statement.
- Contamination Statement.
- Arboricultural Implications Assessment, Tree Survey Schedule, Root Protection Area Schedule & Tree Constraints Plan. If an RPA of any tree proposed for retention overlaps the development, then an Arboricultural Method Statement and Tree Protection Plan will also be required.
- Desk-based assessment of archaeological potential.
- Economic Development Statement.
- Retail Impact Assessment (1000m2 or more) & Sequential Assessment.
- Landscaping Strategy.
- Noise Assessment (only if B2 use class or if Air Cond or other similar plant units are proposed); and
- Transport Assessment and Travel Plan.

In addition, please note that:

- Policy QE DM3 requires that you submit an assessment of the likely impacts of the development on air quality. This should take the form of an Air Quality Assessment.
- Due to the location in the IRZ of the Arun Valley SPA, a Shadow Habitat Regulations Assessment would assist us in assessing the scheme as per the Habitat Regulations.

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the case officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request.

Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations or ordinary watercourse consents. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely

A handwritten signature in black ink, appearing to be 'NC' followed by a flourish and a period.

Neil Crowther
Group Head of Planning

Application for Planning Permission
DECISION NOTICE

Application Ref: A/125/13

1 To Addressee

Ms S Page,
CgMs,
140 London Wall,
London,
EC2y 5DN

2 Site Address

Land South of A259 and West of Mill Lane,
New Road,
Rustington,
West Sussex

3 Description of Development

Hybrid planning application for the development of the site to provide in outline with all matters reserved apart from access and landscaping up to 3365 sqm A1 retail use (including parking) and full planning for 3947 sqm and Sui Generis vehicular floorspace (including ancillary facilities, landscaping and parking) including workshops, MOT facility, car valeting & car storage. New access from A259 - Departure from the Development Plan. Also within the parish of Rustington.

4 In pursuance of their powers under this Act and related Orders and Regulations the Council **PERMIT** this development to be carried out in accordance with the application and plans and subject to compliance with the conditions specified below and the obligations under the Section 106 Agreement

The conditions below refer to the 'full' matters within the planning application (Access, Internal Road and Sui Genris Car Garage)

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be carried out in accordance with the following approved plans and statements:

Drawing Title	Drawing Number
Proposed Site/Block Plan	L(00)103 M
Proposed Location Plan	L(00)101 I

Proposed Elevations and Sections	300 C
Proposed BMW/MINI Ground and First Floor Plan	200 B
Holophane Lighting Drawing	Rev 4
Smoking Shelter Details	501 B
Proposed BMW/MINI Roof Plan	201 B
Proposed Parking Layout	L(00) 104 H
Landscaping Drawing	18832-03F

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with GEN7 of the Arun District Local Plan.

3. Development shall not commence until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority.

The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, the recommendations of the SUDS Manual produced by CIRIA.

Winter groundwater monitoring to establish highest annual ground water levels and Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage.

No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.

4. The development shall not proceed until formal consent has been approved in writing from the Lead Local Flood Authority (WSCC) or its agent (ADC) for the discharge of any flows to watercourses, or the culverting, diversion, infilling or obstruction of any watercourse on the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run off values.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.

5. Development shall not commence until full details of the maintenance and management of the SUDs system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturers recommended design life. Upon completed construction of the SuDs System, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

Reason: To ensure the efficient maintenance and on-going operation of the SuDs system and to ensure the best practice in line with guidance set out in 'The SuDs Manual' CIRIA publication ref: C697 Chapter 22

6. The development layout shall not be agreed until such time that arrangements for the future access and maintenance of any watercourse or culvert (piped watercourse) crossing or abutting the site has been submitted and approved in writing by the Local Planning Authority.

No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities of any watercourse on or adjacent to the site.

Reason: To ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion.

7. Construction shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water. The development will be carried out to comply with the agreed scheme.

Reason: To ensure suitable foul and sewerage water disposal in accordance with policies GEN7 and Gen8 of the Arun District Local Plan.

8. If, during development, contamination not previously identified is found to be present at the site then no further development within the affected area (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the New Pit Chalk Formation which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

9. The development permitted by this planning permission shall be carried out in accordance with the following mitigation measures detailed within the Approved Flood Risk Assessment (FRA) 5046/2.3F:

- Limiting the surface water run-off generated by the critical storm so that it will not exceed the run off from the undeveloped site and not increase the risk of flooding off site.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing/phasing arrangements embodied within the scheme, or within any other period as may subsequently agreed, in writing, by the Local Planning Authority.

Reason: To ensure the satisfactory storage of/disposal of surface water from the site and reduce the risk of flooding to the proposed development and future occupants in accordance with the NPPF.

10. No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. In the event that such consent is sought and given by the local planning authority the development shall be carried out in accordance with the approved details.

Reasons: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the New Pit Chalk Formation which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

11. An archaeological investigation of the site shall be carried out at the expense of the developer in accordance with the Written Scheme of Investigation submitted with the application (Archaeology South East January 2013) prior to the commencement of building works. The development hereby approved shall be carried out in accordance with the Written Scheme of Investigation.

Reason: To ensure appropriate investigation and recording of archaeological heritage assets on the site prior to commencement of new building works.

12. No building shall be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition 11 and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To ensure that archaeological remains and features are recorded and published prior to their destruction

13. No development shall be first occupied until such time as the vehicular access and associated access road serving the development has been constructed in accordance with the approved planning drawing Proposed Location Plan L(00)101 I.

Reason: In the interests of road safety.

14. No part of the development shall be first occupied until provision has been made within the site in accordance with plans and details to be submitted to and approved by the Local Planning Authority to prevent surface water draining onto the public highway.

Reason: In the interests of road safety.

15. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters;

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,

- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- measures to control the emission of dust and dirt during demolition and construction, lighting for construction and security,
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

16. The Approved Framework Travel Plan (RGP October 2013) shall be implemented in accordance with the timescales specified therein, to include those parts identified as being implemented prior to occupation and following occupation, unless alternative timescales are agreed in writing with the Local Planning Authority. The Approved Travel Plan shall be monitored and reviewed in accordance with the agreed Travel Plan targets to the satisfaction of the Local Planning Authority

Reason: To support sustainable transport objectives including a reduction in single occupancy car journeys and the increased use of public transport, walking and cycling.

17. No development shall take place until there has been submitted to, and approved by, the Local Planning Authority, a landscaping scheme including details of hard and soft landscaping and details of existing trees and hedgerows to be retained, together with measures for their protection during the course of the development. The approved details of the landscaping shall be carried out in the first planting and seeding season, following the occupation of the buildings or the completion of the development, whichever is the sooner, and any trees or plants which, within a period of five years from the completion of development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.'

Reason: In the interests of amenity and of the environment of the development in accordance with policy GEN7 of the Arun District Local Plan.

18. If within a period of five years from the date of the planting of any tree or shrub approved under condition 17, that tree or shrub (or any tree or shrub planted in replacement for it) is removed, uprooted or destroyed or dies (or becomes in the opinion of the Local Planning Authority seriously damaged or defective) another tree or shrub of the same species and size as that originally planted shall be planted at the same place.

Reason: To ensure that adequate provision is made for the planting of trees and shrubs and in the interests of maintaining and enhancing the quality and enjoyment of the environment.

19. No development shall commence until a scheme for the provision of external lighting has been submitted to and approved in writing by the Local Planning Authority. Such scheme shall include full details of the locations, design, luminance levels, light spillage, hours of use, and columns for all external lighting within the site. The approved scheme shall be implemented in full prior to the occupation of the buildings.

Reason: To safeguard the residential amenities of the local area in accordance with policies GEN7 and GEN32 of the Arun District Local Plan.

20. The buildings shall not be occupied until the 36 parking spaces, and turning facilities shown on the submitted plans have been provided and constructed. The areas of land so provided shall not thereafter be used for any purpose other than the parking and turning of vehicles.

Reason: To ensure that adequate and satisfactory provision is made for the accommodation of vehicles clear of the highways in accordance with policy GEN7 of the Arun District Local Plan.

21. The construction of external facing materials for each building shall not take place until details and samples of all external walling, window, door and roofing materials for that building have been submitted to and approved in writing by the Local Planning Authority. Such materials shall be made available on site prior to the commencement of their use, for the inspection of the Local Planning Authority who shall be notified in writing of their availability. The building works shall be constructed from the materials thereby approved.

Reason: In the interests of visual amenity in accordance with Arun District Local Plan Policy GEN7.

22. No mechanical ventilation or air conditioning system or any other plant machinery shall be installed or operated for each building until details of the installation and operation of the system have been submitted to and approved in writing by the Local Planning Authority. The system shall thereafter only be installed and operated in accordance with the approved details.

Reason: In the interests of amenity in accordance with Arun Local Plan Policies GEN7, DEV26 and GEN34

23. The development shall be carried out to generally accord with the UK Police 'Secured by Design' and Crime Prevention through Environmental Design (CPTED) principles. Prior to the commencement of development a scheme shall be submitted to and approved in writing by the Local Planning Authority detailing the crime prevention measures to be incorporated in the proposed development.

Reason: In the interests of public safety in accordance with Arun District Local Plan Policy GEN7.

24. Prior to commencement of construction, written evidence will be submitted to and approved in writing by the Local Planning Authority that the development is registered with a BREEAM certification body and a preassessment report (or a design stage certificate with interim rating if available) has been submitted indicating that the development can achieve BREEAM level "Good". The documentation will include an energy plan showing that a minimum of 10 percent of on-site energy will be produced by low and zero carbon technologies. The development hereby approved shall achieve a BREEAM rating of "Good" and a final certificate shall be submitted for the written approval of the local planning authority within 6 months of the occupation of the development.

Reason: To reduce carbon dioxide and other greenhouse gas emissions and adapt to climate change in accordance with Policy GEN21 of the adopted Arun District Local Plan.

25. Prior to the commencement of development of any preparatory works an Ecological Protection & Enhancement Plan shall be submitted to and agreed in writing by the Council. The Plan shall be based on the mitigation measures proposed in Section 4 of the Ecological Appraisal dated October 2013 prepared by PJC Consultancy and will

include a programme of ecological monitoring to inform the long-term management of the site. The Plan will include an work programme with clear timelines for each mitigation measure to be carried out. The mitigation measures shall be implemented in accordance with the timescales set out in the agreed plan.

Reason: To ensure the protection and retention of biodiversity in accordance with Arun District Local Plan Policy GEN29

26. Demolition and construction works shall not take place outside 08.00 hours to 18.30 hours Mondays to Fridays and 08.00 hours to 13.30 hours on Saturday. There will be no construction on Sundays or Bank Holidays.

Reason: To safeguard the residential amenity of the area in accordance with the Arun District Local Plan.

27. No development shall commence until such time as temporary arrangements for access for construction traffic has been provided in accordance with plans and details submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety and the amenities of the area.

28. No part of the development shall be first occupied until 6 covered and secure cycle parking spaces have been provided in accordance with plans and details submitted to and approved by the Local Planning Authority.

Reason: To ensure that adequate and satisfactory provision is made for the accommodation of bicycles in accordance with policy GEN7 of the Arun District Local Plan.

The conditions below refer to the 'outline' matters within the planning application (proposed retail floor space)

1. The permission hereby granted is an outline permission under Article 3(1) of the Town and Country Planning (General Development Procedure) Order 1995 and an application for the approval of the Local Planning Authority to the following matters must be made not later than the expiration of 3 years beginning with the date of this permission:-

- (a) Layout;
- (b) Scale;
- (c) Appearance;
- (d) Landscaping.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall be begun either before the expiration of 5 years from the date of this permission, or before expiration of 2 years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

3. The development hereby approved shall be carried out in accordance with the following approved plans:

Drawing Title	Drawing Number
Proposed Site/Block Plan	L(00)103 M
Proposed Location Plan	L(00)101 I
Proposed Parking Layout	L(00) 104 H
Landscaping Drawing	18832-03F
Proposed Site Sections	5987-I(05)106C

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with policy GEN 7 of the Arun District Local Plan.

4. Prior to the submission of any reserved matters the applicants shall submit to and have approved in writing by the Local Planning Authority a parameter plan and design code, the development shall be carried out in accordance with the approved parameter plans and Design Code.

Reason: In the interests of visual amenity in accordance with adopted policy GEN7 of the Arun District Local Plan 2003

5. The gross external floorspace of the retail stores hereby approved shall not exceed 3,365 square metres. The net retail sales area (defined by the National Retail Planning Forum, and reproduced in Appendix A of the PPS4 Practice Guide, 2009) shall not exceed 2,888 square metres. A maximum of one unit shall be used for the sale of food convenience goods with a gross external area that shall not exceed 1,400 square metres. No mezzanine floors are to be inserted in any part of the building, retail floorspace or non-retail floorspace areas, whatsoever, without the prior approval of the Local Planning Authority.

Reason: To accord with the stated intentions of the submitted Design and Access Statement, and the submitted Retail Impact Assessment in accordance with the NPPF.

6. The non-food retail warehouses element of the development hereby permitted shall only be used for the sale and the display of the following goods: DIY, home improvement and garden goods; furniture, carpets and floor coverings; camping, boating and caravanning goods; kitchens, bathrooms and accessories; homewares including home office goods; and soft furnishings; and for no other purposes (including any other purpose in Class A of the Schedule of the Town and Country Planning (Use Classes) Order 1987 as amended) without the prior permission in writing of the Local Planning Authority. Goods falling outside this range including seasonal goods may be sold only where they form a strictly minor and ancillary part of the proposed store's operation.

Reason: To protect town centre viability, in accordance with the NPPF and policies DEV26 and DEV27 of the Arun District Local Plan 2003

7. Notwithstanding the restrictions included in Condition 5, up to 1,200 square metres gross external floorspace can be used by a catalogue retailer for the sale of all non-food goods within Class A1 with the exception of clothing and footwear, books and newspapers; and pharmaceutical goods. A catalogue showroom retailer in this condition is defined as a retailer selling a wide selection of non-food goods selected by the visiting public from a catalogue and supplied to them fully packed. Should any unit be occupied by a catalogue showroom retailer at all times at least 50% of the gross

floor area of the unit must be used for storage and not open to access by retail customers; and no more than 600 square metres of the gross floor area shall be used for the retail display and sale of goods to visiting members of the public.

Reason: As these figures reflect the retail assessment carried out and to protect the vitality and viability of designated local centres in accordance with Policies DEV26 and DEV27 of the Arun District Local Plan 2003.

8. Notwithstanding the provision of Section 55 of the Town and Country Planning Act 1990 (or any Act revoking and re-enacting that Act with or without modification) the non-food bulky goods retail units hereby approved will have a gross internal area of greater than or equal to 600 square metres.

Reason: As these figures reflect the retail assessment carried out and to protect the vitality and viability of designated local centres in accordance with Policies DEV26 and DEV27 of the Arun District Local Plan 2003.

9. External lighting in association with this development shall comply with Institution of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Light, Obtrusive Light Limitations for Exterior Lighting Installations for Zone E2

Reason: To safeguard the residential amenities of the local area in accordance with policies GEN7 and GEN 32 of the Arun District Local Plan.

10. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters;

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- measures to control the emission of dust and dirt during demolition and construction, lighting for construction and security,
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

11. Demolition and construction works shall not take place outside 08.00 hours to 18.30 hours Mondays to Fridays and 08.00 hours to 13.30 hours on Saturday. There will be no construction on Sundays or Bank Holidays.

Reason: To safeguard the residential amenity of the area in accordance with the Arun District Local Plan.

12. The retail store shall only be open for trade between the hours of 07.00 and 23.00 Monday to Saturdays and will comply with the Sunday Trading Act 1994 (or subsequent replacement) on Sundays. Except for the week (7 days) immediately before Christmas Day and for the week (7 days) immediately before Easter Sunday, when the retail store shall only be open for trade between the hours of 06.00 and

24.00 Monday to Saturday and will comply with the Sunday Trading Act (or subsequent replacement) on Sundays.

Reason: To comply with Arun District Local Plan policy GEN32, and in accordance with the NPPF.

13. No new development shall be occupied until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for minimum of 190 customer cars and a minimum 16 cycles to be parked. Sufficient on-site car and cycle parking shall also be provided for staff, the exact numbers to be submitted to and approved in writing by the Local Planning Authority. The parking/turning areas shall be used and retained exclusively for its designated purpose.

Reason: To ensure that adequate and satisfactory provision is made for the accommodation of cycles vehicles clear of the highways in accordance with policy GEN7 of the Arun District Local Plan.

14. The Approved Framework Travel Plan (Mayer Brown October 2013) shall be implemented in accordance with the timescales specified therein, to include those parts identified as being implemented prior to occupation and following occupation, unless alternative timescales are agreed in writing with the Local Planning Authority. The Approved Travel Plan shall be monitored and reviewed in accordance with the agreed Travel Plan targets to the satisfaction of the Local Planning Authority

Reason: To support sustainable transport objectives including a reduction in single occupancy car journeys and the increased use of public transport, walking and cycling and in recognition of the National Planning Policy Framework paragraph 36

15. No development shall take place until there has been submitted to, and approved by, the Local Planning Authority, a landscaping scheme including details of hard and soft landscaping and details of existing trees and hedgerows to be retained, together with measures for their protection during the course of the development. The approved details of the landscaping shall be carried out in the first planting and seeding season, following the occupation of the buildings or the completion of the development, whichever is the sooner, and any trees or plants which, within a period of five years from the completion of development, die are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: In the interests of amenity and of the environment of the development in accordance with policy GEN7 of the Arun District Local Plan.

16. No development shall take place until written evidence is submitted to and approved in writing by the Local Planning Authority that the development is registered with a BREEAM certification body and a pre-assessment report (or a design stage certificate with interim rating if available) has been submitted indicating that the development can achieve the BREEAM level "Good". The scheme should aim to incorporate on-site renewable energy equipment to meet 10% of expected energy needs of the development from renewable sources and shall be implemented as approved.

The retail stores hereby approved shall achieve a BREEAM retail rating of "Good" and a final certificate shall be submitted for the written approval of the local planning authority within 6 months of the occupation of the development.

Reason: To reduce carbon dioxide and other greenhouse gas emissions and adapt to climate change in accordance with Policy GEN21 of the adopted Arun District Local

Plan.

17. Development shall not commence until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, the recommendations of the NPPF and the SUDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policies GEN7 and GEN9 of the Arun District Local Plan.

18. Development shall not commence until full details of the maintenance and management of the SUDs system is set out in a site-specific maintenance manual and submitted to and approved, and approved in writing by the Local Planning Authority. The development will then be carried out to comply with the agreed maintenance manual.

Reason: To ensure the efficient and on-going operation of SuDs system and to ensure best practice in line with Guidance set out in "The SuDs Manual" CIRIA Public Ref C697 Ch22.

19. The development layout shall not be agreed until such time that arrangements for the future access and maintenance of any watercourse or culvert crossing or abutting the site has been submitted to and approved in writing by the Local Planning Authority. No construction is permitted, which will restrict current and future land owners from undertaking their repair and maintenance responsibilities of any watercourse on or adjacent to the site.

Reason: To ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following development completion.

20. Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing, by the Local Planning Authority in consultation with Southern Water. The development will then be carried out to comply with the agreed scheme.

Reason: To ensure suitable foul and sewerage water disposal in accordance with Policies GEN7 and GEN9 of the Arun District Local Plan.

21. No development shall be carried out unless and until a schedule of materials and finishes and samples of such materials and finishes to be used for external walls, glazing and roof of the proposed building have been submitted to and approved by the Local Planning Authority and the materials so approved shall be used in the construction of the building.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of amenity by endeavouring to achieve a building of visual quality in accordance with policy GEN7 of the Arun District Local Plan.

22. The proposed lighting shall not be brought into use until measures to avoid unacceptable glare to users of the public highway have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning

Authority and thereafter retained in perpetuity.

Reason: To ensure the development does not prejudice highway safety nor cause inconvenience to other highway users.

23. No development shall commence until such time as temporary arrangements for access for construction traffic has been provided in accordance with plans and details submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety and amenities of the area.

24. No development shall be first occupied until such time as the vehicular access and associated access road serving the development has been constructed in accordance with the approved planning drawing Proposed Location Plan L(00)101

Reason: In the interests of road safety.

25. No part of the development shall be first occupied until provision has been made within the site in accordance with plans and details to be submitted to and approved by the Local Planning Authority to prevent surface water draining onto the public highway.

Reason: In the interests of road safety.

INFORMATIVE: Statement pursuant to Article 31 of the Town and Country Planning (Development Management Procedure)(England) (Amendment No. 2) Order 2012. The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern within the application (as originally submitted) and negotiating, with the Applicant, acceptable amendments to the proposal to address those concerns. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

Case Officer: Cian Cronin

Date of Decision: 13th June 2014

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF

Karl Roberts
Assistant Director Planning & Economic Regeneration

IT IS IMPORTANT THAT YOU READ THE NOTES ATTACHED TO THIS DOCUMENT



RETAIL ASSESSMENT

LAND OFF MILL LANE, RUSTINGTON

**Store Property
Investments Limited**

October 2013

Planning • Heritage

Specialist & Independent Advisors to the Property Industry

**Author:
Serena Page**

**Approved by:
Malcolm Honour**

**Report Status:
Final**

**Issue Date:
October 2013**

**CgMs Ref:
SP/15901**

© CgMs Limited

No part of this report is to be copied in any way without prior written consent.

Every effort is made to provide detailed and accurate information, however, CgMs Limited cannot be held responsible for errors or inaccuracies within this report.

© Ordnance Survey maps reproduced with the sanction of the controller of HM Stationery Office.
Licence No: AL 100014723

CONTENTS

PAGE(S)

1.0	INTRODUCTION	4
2.0	SITE DESCRIPTION AND PROPOSED DEVELOPMENT	6
3.0	PLANNING POLICY FRAMEWORK	8
4.0	RETAIL IMPACT ASSESSMENT	12
5.0	THE SEQUENTIAL APPROACH	38
6.0	CONCLUSIONS.....	44

APPENDICES

APPENDIX 1 – CATCHMENT AREA PLAN

APPENDIX 2 – RETAIL IMPACT TABLES

1.0 INTRODUCTION

- 1.1 This retail assessment has been prepared by CgMs Ltd acting on behalf of Store Property Investments Limited, in support of a hybrid planning application for a retail development and a car showroom at land off Mill Lane Rustington.
- 1.2 The proposal will allow for two additional retail units. At this point in time the applicant envisages that one retail unit would be used for food (convenience) and one for non-food (comparison). This retail assessment has tested the proposal on the basis of this configuration of units.
- 1.3 The retail part of the application is submitted in outline with all matters reserved with the exception of access and landscaping. As yet retailers for the proposed units have not been secured for either unit, hence the application is submitted in outline, of a quantum to meet the market demand for retail floorspace in the area.
- 1.4 The submission of the application follows a number of discussions with Council Officers, Town Council members, and general public as set out later in this report and within the Statement of Community Engagement. The content of this statement has been informed by Arun District Council's pre-application response reference PAA/86/13/ and has been informed by the Arun Retail Study 2013 produced by DPDS.
- 1.5 This statement focuses on the retail implications of the development assessed against national and local retail policy, whilst the supporting Planning Statement sets out the scope of the proposed development and assesses the relevant planning policy.
- 1.6 This Retail Assessment is set out as follows:
- Section 2.0 describes the application site and context and the proposed development;

- Section 3.0 outlines the national and local planning policy context;
- Section 4.0 sets out the retail impact of the proposal;
- Section 5.0 sets out the sequential approach to site selection; and
- Section 6.0 summarises and concludes the statement.

2.0 SITE DESCRIPTION AND PROPOSED DEVELOPMENT

Site Location and Site Context

- 2.1 The application site is 4.6 hectares and is located to the south of the A259 and to the west of Mill Lane. The retail component of the proposal will be located on the western portion of the site and will be accessed via an internal roundabout. The site is located within the Parish of Angmering, however, falls adjacent to the built up area of Rustington.
- 2.2 The site is out-of-centre in retail terms, however, it is located adjacent to an existing retail park 'Rustington Retail Park' where planning permission has recently been granted and construction is on-going in respect of the redevelopment of the Sainsbury's store.
- 2.3 There are no-named retailers to occupy the units at present. However, there have been some initial discussions with prospective retailers all of which are currently unrepresented in Arun, neither of which can be accommodated within the town centre owing to the size of the unit required and also the need for surface level car parking in close proximity. The applicant also has significant land ownership interests in the centre of Rustington and therefore has managed the existing retail park, and intends to manage the two proposed units in a way that will complement rather than compete with the town centre. To this end the applicant is content to accept a suitably worded condition restricting the range of goods on this basis.
- 2.4 The retail units will complement the car showroom development in a number of ways, but most importantly they will facilitate the infrastructure necessary to allow Chandlers to locate on the application site. There are however, synergies between the two uses, in addition to the synergies with the existing Rustington Retail Park.
- 2.5 As detailed elsewhere within this report and within the planning statement the applicant has permission to redevelop the Focus retail unit to provide an uplift of

floorspace equivalent to the unit shown on the drawings for non-food only. The applicant's preference would be to develop this quantum of floorspace on the application site, rather than on the existing retail park, and as such would be content to revoke this permission without compensation if planning permission is forthcoming and the units are occupied. It is important to emphasise, that whilst this statement tests the impact of the floorspace of both units, a large proportion of the floorspace already benefits from planning permission. In the cumulative assessment however, the commitment for Rustington Retail Park has not been assessed to reflect this position.

3.0 PLANNING POLICY FRAMEWORK

- 3.1 This section examines the national and local retail planning policy relevant to the consideration of the proposed retail floorspace.

National Planning Policy Framework

- 3.2 The Government's planning policies for town centres are set out at paragraphs 23 – 27 of the NPPF, which revokes previous planning policy issued in the form of planning policy statements and guidance including PPS4. Whilst PPS4 has been revoked by the NPPF, the PPS4 Guidance - *Practice Guidance on need, impact and the sequential approach* remains valid as a non-statutory standard guide for undertaking the sequential site and retail impact analysis.
- 3.3 Paragraph 23 of the NPPF imposes a requirement upon local planning authorities to plan positively for the growth of retail and other forms of main town centre uses, where the need for such uses should be met in full and should not be compromised by limited site availability.
- 3.4 The NPPF, like its PPS4 predecessor, directs new retail development to town centres to support their viability and vitality. Proposals outside town centres and not in accordance with an up to date development plan should be subject to sequential and impact testing.
- 3.5 Paragraph 24 of the NPPF requires a sequential test to be applied on planning applications for main town centre uses that are outside an existing centre or not in accordance with an up-to-date development plan. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.
- 3.6 Paragraph 26 of the NPPF requires an impact assessment for development located outside of town centre or not in accordance with an up-to-date Local Plan which exceed a proportionate locally set threshold (a default threshold of

2,500sqm if there is no local policy threshold). Paragraph 26 goes on to note that impact assessments should consider two matters:

- *"The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- *The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centres and wider area, up to five years from the time the application was made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made."*

3.7 Development should only be refused if an application fails to satisfy the sequential test or is likely to have 'significant adverse' impact on one or more of the above factors.

Local Planning Policy

3.8 The development plan for the District comprises the saved policies of the Arun District Local Plan. Saved Policy DEV26 of this plan sets out the criteria which all new retail development should meet.

Policy DEV26: Criteria for Retail Development

"The District will seek to maintain the existing hierarchy of retail centres within Arun. Retail development which accords with this objective will be permitted provided that:

- It is a high standard of design, materials and layout, and has due regard to the character of the site and its surroundings;*
- It is easily accessible by public transport;*

- iii. It includes provision for access by cycle and on foot;*
- iv. It includes appropriate provision to enable access for people with disabilities; and*
- v. The design incorporates crime prevention measures."*

3.9 As this application is in outline, with layout, scale and appearance reserved for future consideration, it is not possible to assess the proposals against the criteria above at this time, with the exception of accessibility which is discussed in the Transport Assessment by Mayer Brown.

3.10 The hierarchy of shopping facilities in Arun confirms that Bognor Regis is the major retail centre in Arun, but emphasises that other centres in the hierarchy should also be supported with the key aim being to: "Maintain the relative positions of Littlehampton, Rustington and Arundel." (paragraph 3.34). The notable omission from the retail hierarchy within the policy is Wick.

3.11 Policy DEV27 of the Arun Local Plan deals with proposals for retail developments outside the designated principal shopping areas, as detailed below:

Policy DEV27: Retail Development Outside the Principal Shopping Areas.

"Proposals outside the Principal Shopping Areas, as defined on the Proposals Map, for non-food and food retailing including extensions will be permitted provided that:

- a) The proposal does not adversely affect the vitality and viability of the Principal Shopping Areas and Local Shopping Area, either as an individual development or cumulatively with similar existing or proposed developments;*
- b) It is easily accessible by the highway network and public transport;*

- c) *It includes provision for access by cycle and foot;*
- d) *It includes appropriate provision to enable access for people with disabilities."*

3.12 The policy goes on to state that applications for major development will need to be accompanied by a full assessment of the potential impact on town centres and nearby centres. Applicants proposing retail development on out of centre site are required to demonstrate that no suitable site can be found, firstly within the existing town centre or secondly on the edge of the centre.

3.13 The policy also requires applicants to demonstrate need for additional facilities. This has not been undertaken as part of this assessment, by reference to the updated retail policies within the NPPF, which no longer require this test for development control purposes.

3.14 This assessment and the planning statement demonstrate that all of the relevant tests have been passed. Policy DEV27 also states that where the criteria are satisfied and permission is granted, it will be made subject to planning condition or legal agreement as appropriate to:

- a) Restrict the range of products sold, and
- b) Restrict the unit size to a minimum of 1,000 sq. m with no further sub-division allowed.

3.15 The following sections proceed to analyse the proposed floorspace in respect of the tests described above.

4.0 RETAIL IMPACT ASSESSMENT

- 4.1 The nature of the application proposal helps to limit the trading consequences of the proposed retail units on town centres. The NPPF requires applicants to consider the likely trading impact of out of centre retail development on established shopping centres. Accordingly, this section of the retail assessment considers whether there will be any harmful trading effects arising from the proposed retail floorspace by reference to health checks (qualitative appraisal) and a trade draw assessment (quantitative appraisal).
- 4.2 Although the NPPF, superseded all Planning Policy Statements and Guidance, the accompanying Practice Guidance remains in place. As such the advice contained within the PPS4 Practice Guidance remains a material consideration. Accordingly in assessing impact we have continued to have regard to the criteria in the Practice Guidance at Part 7, Appendix B and D.
- 4.3 In order to determine whether the proposed retail floorspace will have a detrimental impact on the vitality or viability of any of the existing centres, health checks have been undertaken. Due to the scale of the floorspace proposed and likely future occupiers, any impact is likely to be mainly on other out of centre retail warehouses and larger centres that offer comparable ranges of goods. The impact on smaller centres, i.e. those that principally provide a convenience shopping role for a localised catchment area, will be negligible.

Littlehampton Town Centre Health Check

- 4.4 Littlehampton is the second largest centre within Arun and is identified as a District Town Centre in the Draft Local Plan. Littlehampton serves as the main town centre for the combined urban area Littlehampton, Rustington and Angmering. The town centre benefits from a retail, administrative and tourist function and has variety of well established national multiple independent retailers. The main retail area of Littlehampton is focused on the pedestrianised High Street. There are also a number of smaller shopping streets such as Surrey Street, Anchor Springs, Beach Road and East Street.

- 4.5 Diversity of Uses: Littlehampton was surveyed by Experian Goad in April 2012. The table below provides a breakdown of the retail composition for Littlehampton based on the Experian Goad data, and the Retail Composition percentage breakdown of Littlehampton provided by the Arun District Council Retail Study 2013.

Table 1 – Littlehampton Retail Composition Breakdown

	Goad 2010		April 2012	
	Number	%	Number	%
Convenience	15	7	11	6
Comparison	61	28	71	38
Service/Other	102	47	75	41
Vacant	40	18	27	15
Total	218	100	185	100

Source: Goad retail survey (April 2012), Arun District Council Retail Study 2013

- 4.6 At the time of the Goad survey, there were a total of 185 units identified in Littlehampton. The number of convenience units has fallen since the data used in the Retail Study. However, in both surveys the percentage of convenience units is below the UK national average of 9% compared to 6% and 7%.
- 4.7 The centre has considerably improved its provision for comparison retail from the 2010 survey with an increase of 10 units and a percentage increase from 28% to 38%. However, despite this increase the centre still has a below average percentage of comparison retailers.
- 4.8 The number of 'service' and 'other' units have dropped from the number recorded in the Retail Study by 27. However, the centre still has a higher percentage of service and other retailers (41%) compared to the national average (35%).
- 4.9 The number of vacant units in Littlehampton has considerably decreased since the 2010 survey from 40 to 27. However, despite the improving situation the percentage of vacant units in Littlehampton is still above the 2012 national average. Table 2 summarises the 27 vacant units in Littlehampton. The units

have been categorised by their gross internal area and placed within the ranges of 0 – 100 sq. m, 101 – 200 sq. m, 201- 300 sq. m, 301- 400 sq. m, 401 – 700 sq. m, 701 sq. m and over. This has then been provided as a percentage of the total number of vacant units within the centre.

Table 2 – Littlehampton Vacant Units (Floorspace)

	April 2012	
	Number of Units	%
0 – 100m²	19	70
101 – 200m²	5	18
201 – 300m²	1	4
301- 400m²	1	4
401 – 700m²	0	0
701m² +	1	4
Total	27	100

Source: Experian Goad April 2012 Survey

- 4.10 As the table shows apart from one unit, 26 of the vacant units in Littlehampton are smaller than 500 sq. m. The majority (70%) of vacancies in Littlehampton are less than 100 sq. m. The largest vacant unit in Littlehampton has an area of 2,810 sq. m and is located in Surrey Street.
- 4.11 Retailer Representation: There are a number of national multiple retailers in the centre including: Waitrose, Sainsbury's, Peacocks, Iceland, M&Co, Boots, Superdrug, Dorothy Perkins, Holland & Barrett, New Look, The Body Shop and WH Smith. The centre also provides a number of services including estate agents, pubs, coffee shops and banks.
- 4.12 The primary convenience shopping offer in the town centre is provided by Sainsbury's, Iceland, Lidl and Waitrose. This is a relatively large number of convenience stores and could be used for main food shopping, however, the centre predominantly serves residents as a 'top up' centre. This is clear from the household survey that informed the DPDS 2013 Retail Study. There are also a variety of smaller specialist convenience retailers including a delicatessen, greengrocer and baker.

- 4.13 Retail Requirements: According to the District Council Retail Study 2013 (paragraph 4.40) there has been a “marked falling off in retail demand over recent years” in Littlehampton. The most recent Focus data for the centre shows that there are currently 3 retailer requirements in September 2013 showing no change from the Retail Study.
- 4.14 Rents: According to the 2013 Retail Study Zone A rents within the town centre are around the £30/sq ft with secondary rents between £18-20/sq. ft. The historic high for primary rents in Littlehampton was around £45/sq.ft between the years 2004 -2008.
- 4.15 Pedestrian Flows: The highest pedestrian flows in the centre are along the pedestrianised High Street leading toward St Martin’s car park. The Council’s household survey found high levels of satisfaction with the ease of pedestrian movement around the centre.
- 4.16 Accessibility: Littlehampton has good road links, and is in close proximity to wider road networks including the A283, A259, A27 and A29. The railway station is within easy walking distance of the town centre. It provides regular services to Brighton, London and Portsmouth. The railway station is also a transport hub for the local bus services which provide a network of services to Worthing and Portsmouth as well as small local centres. However, Littlehampton does not have a dedicated bus station.
- 4.17 There is a good provision of car parking within the centre with over 500 spaces available across 5 car parks and street parking. A parking system operates in three of the car parks allowing for 2 hours of free parking.
- 4.18 Perception of Safety and Crime: According to the Sussex Police website there are currently no local priorities for the town centre. This shows the centre to be relatively safe.
- 4.19 Environmental Quality: Overall Littlehampton is considered clean and well maintained both in terms of the shopping environment and retail premises

according to the District Council's Retail Study. The pedestrianised High Street creates a relaxing and pleasant area for shopping with a good mix of retailers.

- 4.20 Conclusions: Littlehampton provides a fully functioning, vital and viable retail destination. There is a good range of convenience retailers and goods for residents to choose from. Littlehampton's range of comparison retailers could be improved. However, it does benefit from retailers such as New Look and Superdrug, and a good mix services such as estate agents and banks. Vacancy rates in the town are higher than the national average, however, they have fallen since 2010. The majority of vacant units are small, with over 70% less than 100 sq. m.

Rustington Town Centre Health Check

- 4.21 Rustington is a compact seaside town designated as a Large Service Centre in the Draft Local Plan. The centre is well established and offers a mixture of multiple and independent retailers. The principal shopping area is focused at The Street. Rustington has four anchor stores in its town centre these are, the Co-op, Tesco Express and Iceland convenience stores and The Original Factory Shop. All of these are relatively small units with the Tesco Express, Iceland and The Original Factory Shop all less than 500 sq. m. The convenience retailers in the centre provide a good 'top-up' food destination for residents.
- 4.22 Diversity of uses: Rustington was surveyed by Experian Goad in September 2011. The table below provides a breakdown of the retail composition for Rustington based on the Experian Goad data, and the Retail Composition percentage breakdown of Rustington provided by the Arun District Council Retail Study 2013.

Table 3 – Littlehampton Retail Composition Breakdown

	2009		2011	
	Number	%	Number	%
Convenience	14	12	13	11
Comparison	42	35	51	44
Service/Other	54	45	46	40
Vacant	10	8	6	5
Total	120	100	116	100

Source: Goad retail survey (April 2012), Arun District Council Retail Study 2013 (Goad 2009)

- 4.23 Rustington accommodates a relatively high percentage of 'Convenience' units. A total of 11% of units within the town centre are convenience which is higher than UK national average in 2011 of 9%. This has remained very similar to the 2009 Goad survey.
- 4.24 The centre has a higher proportion of 'Comparison' and 'Service' units, at 44% and 40% respectively, when compared to the national average in 2011. The percentage of comparison units has risen by 9% compared to the 2009 survey. While the percentage of 'Service' units has dropped by about 6%.
- 4.25 Vacancy rates: Vacancy rates for Rustington are significantly below the UK average of 14% in 2011 compared to 5% recorded by Goad in Rustington. The vacancy rate has dropped since 2009 from 8% to 5% and the number of vacant units has fallen from ten to six.
- 4.26 Table 4 summarises the six vacant units in Rustington. The units have been categorised by their gross internal area and placed within the ranges of 0 –100 sq. m and 101 – 150 sq. m. This has then been provided as a percentage of the total number of vacant units within the centre.

	September 2011	
	Number of Units	%
0 - 100m²	5	83
101 – 150m²	1	17
Total	6	100

Source: Experian Goad September 2011 Survey

- 4.27 The table shows that only one vacant unit in the centre is larger than 100 sq.m with the rest having less than 100 sq. m GIA.
- 4.28 Retailer Representation: According to the GOAD plan there are 10 national multiple retailers located within the centre. These are Co-op, Tesco Express, Iceland, The Original Factory Shop, Superdrug, Boots, Greggs, Holland & Barrett, La Senza and WH Smith. Considering its size, Rustington has a relatively good range of multiple retailers. The centre also provides a number of services including estate agents, a pub, coffee shops and banks. The centre benefits from active management by the majority landlord, who is also the applicant for this application. The applicant has a good understanding of the role and function of the town centre, and seeks to ensure that the out of centre provision does not undermine the in-centre provision.
- 4.29 The convenience shopping is generally suitable for 'top up' shopping. It is considered that few people use the shops as their main weekly food shopping destination. There are a variety of smaller specialist convenience retailers including butchers, greengrocers and bakers. Rustington provides a number of services including hairdressers, opticians, beauty salons, banks, cafes and takeaways.
- 4.30 Retail Requirements: There is no information available for Rustington from the Focus database.
- 4.31 Rents: There is no information on the level of Zone A or secondary rents for Rustington. However, according to the District Retail Study "the centre is actively managed and popular with retailers" (paragraph 4.58). The centre has

its own website which provides a overview of what the centres provides, parking details and local information.

- 4.32 Pedestrian Flows: According to the Retail Study 2013 there is good pedestrian footfall along The Street, which is where the three main convenience retailers are located.
- 4.33 Accessibility: The centre is easily accessible by car via the B2140 which runs along The Street. There are over 400 car parking spaces provided across the centre with parking along the front of the shopping Parades and two large car parks owned by the applicant (group company). Free parking is provided through a disc parking initiative, similar to the scheme in Littlehampton, which provides 3 hours of free parking.
- 4.34 The centre has regular bus services with a number of bus stops along The Street. These provide links to Littlehampton, Brighton and smaller centres including Wick and Angmering. While Rustington does not have its own railway station, it is only a few minutes away from either Littlehampton or Angmering station by private or public transport.
- 4.35 Perception of Safety and Crime: According to the Sussex Police website there are no local priorities for Rustington town centre. This implies that the town centre is a safe environment. The quality of the centre is good, with little evidence of anti-social behaviour.
- 4.36 Environmental Quality: Rustington is an attractive centre with a high quality environment with well-maintained buildings and an attractive high street. According the Retail Study (2013) the centre is characterised "by a 'garden village' feel" due to the planting and trees which separate the parades from the highway.
- 4.37 Conclusions: Rustington is a vital and viable town centre and has performed strongly despite the recent economic times. The centre provides an excellent range for "top up" shopping via convenience supermarkets and a range of

independent butchers, greengrocers and bakers. There are also a large number of independent comparison retailers. The centre has a low vacancy rate which has remained below the UK average over a number of years. The centre has a successful mix of independent and national multiple retailers for its size which demonstrates that Rustington is performing well, and is a vital and viable centre. Notwithstanding this, it is noted that the recently permitted retail schemes have sought to offset the impacts of trade diversion at Littlehampton, with no offset to Rustington. Comparatively, therefore the management of Rustington operates with limited resources.

- 4.38 In addition to the above the Council has indicated that a health check is required for Wick. This will be sent as an addendum to this document.

Quantitative Assessment of Impact on the Vitality and Viability of Nearby Centres

- 4.39 This section of the report utilises the results of the Arun District Council commissioned household survey to identify the potential impact arising from the proposed new retail floorspace, in line with the policy tests set out in the NPPF and adopted Policy DEV27 of the adopted Local Plan. Although the NPPF, which came into force in March 2012 supersedes all Planning Policy Statements and Guidance, the accompanying Practice Guidance remains in place. As such the advice contained within the PPS4 Practice Guidance remains a material consideration. Accordingly, in assessing impact we have continued to have regard to the criteria in the Practice Guidance Part 7, Appendix B (Quantifying Retail Need) and D (Quantifying Impact).
- 4.40 The NPPF requires a consideration of impact for applications for town centre uses that are not in an existing centre or in accordance with an up-to-date development plan. Paragraph 26 of the NPPF focuses consideration on:
- The impact on existing, committed and planned investment in a centre or centres; and

- The impact on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider area.

4.41 In assessing the proposal against the above criteria we will show that the proposed new units can be accommodated without significant adverse impact on nearby centres.

4.42 To establish the quantitative impact of the proposed retail floorspace, an analysis of existing and future spending patterns within a defined Study Area has been undertaken. This section therefore provides an assessment of the proposal against these key criteria.

The Study Area

4.43 In this instance, on the basis that a household survey has recently been published by the Local Authority, the likely sphere of influence can be assessed having regard to existing retailers in the catchment area.

4.44 A plan illustrating the extent of the catchment area and zones is attached at **Appendix 1**. This map also highlights the key retail centres and out of centre facilities within the catchment area. The plan shows that the study area is well served by large supermarkets, however, access to higher order and lower end food retailing facilities is limited to just two retail units (one high end, one discount).

4.45 The survey zones for the catchment area are as follows:

- Zone 7
- Zone 9
- Zone 10
- Zone 11
- Zone 12

- Zone 13
- Zone 14
- Zone 15

4.46 The main catchment area for the proposal is zones 13 and 14.

4.47 The non-food retailing facilities in the catchment area are very limited, and as a consequence, particularly for bulky items, people living within the catchment area have to travel long distances to purchase such goods. As detailed elsewhere within this report Arun District Council have previously granted permission for the quantum of floorspace proposed on the retail park immediately adjacent. As the proposed floorspace is instead of, rather than in addition to the floorspace already considered acceptable, we consider that this element of the retail floorspace should not be contentious. Notwithstanding this, and mindful of comments made on previous applications, the quantitative modelling exercise has sought to model the full extent of retail floorspace proposed.

4.48 For the purpose of the retail impact assessment, the key issue is whether the extension will lead to a significant adverse impact on facilities that are located within defined Town Centres. The proposed food floorspace is intended to meet the requirements for either high-end or discount food shopping, and non-food retailing for large retail goods to meet the needs for such facilities that are limited at present within the catchment area.

The 2012 Household Survey

4.49 The Council's household survey was undertaken in December 2012 by NEMS Market Research. As the study is considered up-to-date, a new household survey has not been commissioned for this assessment. It is considered that this survey provides an accurate reflection of the nature of food and non-food shopping patterns for the residents of Arun. Furthermore, on the basis that the survey

provides the technical basis to local plan making, it is considered that it is a reliable source for the purposes of this study.

- 4.50 The results of the household survey have been used to examine the influence existing stores have upon residents' spending on both convenience and comparison goods.

Methodology – Impact of the Proposal on In-Centre Turnover

- 4.51 The NPPF requires applicants to assess the likely turnover of the proposed retail floorspace, the level of expenditure to support that floorspace and where the new floorspace would be likely to derive trade from. We have applied a step-by-step methodology to demonstrate anticipated trade diversion and trade impacts on existing provision in the Study Area. The methodology is a standard approach adopted by retail planning professionals and follows the advice set out at Appendix B and D of the PPS4 practice guidance. The base assumptions we have made in undertaking this assessment are as follows:-

1. Population and goods expenditure estimated are derived from the Council's Retail Study based on Experian Retail Planner December 2012;
2. All monetary values are indexed to 2011 prices and are inclusive of VAT;
3. No deduction has been made for Special Forms of Trading (SFT) at this stage. Instead actual levels of SFT have been obtained from respondents to the household survey.

- 4.52 The assessment is then conducted using the following step-by-step approach:

1. Establishing existing expenditure patterns within the Study Area by using a household survey to identify the levels of convenience and comparison turnover that each of the identified store and centres derive from spending by households within the Study Area;

2. Projecting the patterns of convenience and comparison expenditure forward to 2018, the design year for testing impact, in accordance with Paragraph 26 of the NPPF;
3. Assessing the likely pattern of trade draw to the proposed store and applying this to the previously calculated patterns of expenditure flows at 2018;
4. Calculating the quantitative impact of the proposed store through allocating reasoned trade diversion, thereby allowing analysis of the percentage reduction in trade at each store or centre at 2018.

4.53 The likely pattern of trade diversion to the proposed store is based on our experience of trading patterns in similar circumstances and the generally acknowledged principle that the effect of the retail floorspace on competing retail stores will generally be proportionate to their distance from the proposed store. Numerous surveys of food shopping patterns through the UK suggest that customers will generally go to the store that is nearest to their home which can provide for their particular shopping needs.

4.54 Furthermore food-stores tend to compete on a like-for-like basis such that, those stores which have large areas of dedicated surface level car parking, provide trolley facilities and provide a particular range of goods will tend to compete directly with each other.

4.55 Before moving on to monetary trade diversion and percentage impacts, it is worth bearing in mind that the impact test contained within the NPPF is not testing whether the proposal will be likely to divert trade from any of the existing centres, (this will always be the case to some extent) but rather whether such a trade diversion is likely to have a significant adverse impact on the centre's overall vitality and viability. Where centres are observed to be trading well, they will be able to withstand more of an impact than where they are not.

Population Projections (Table 1)

- 4.56 The retail impact tables are included in **Appendix 2**. Each zone's catchment population and expenditure data has been obtained from the Council's retail study. Table 1 sets out the total population in the Study Area at the current year, projected forward to the design year of 2018 and beyond. This shows that the total population in the Study Area at 2013 is 142,574 rising to 150,228 at 2018.

Per Capita Expenditure (Tables 2a and 2b)

- 4.57 The per capita expenditure figures are also taken from the Council's retail study, including the assessed growth rates. As mentioned previously no deduction has been made for special forms of trading at this stage.

Total Expenditure (Tables 3a and 3b)

- 4.58 Tables 3a and 3b make use of the population and per capita expenditure figures. For convenience goods, population is multiplied by the amount of expenditure for convenience goods resulting in £269 million assessed to be available in the Study Area in 2013. This increases with population and expenditure growth to £285 million in 2018.
- 4.59 For comparison goods, population multiplied by per capita expenditure for comparison goods results in £414 million by 2013 rising to £477 million by 2018.

Turnover of the Proposals (Table 4)

- 4.60 Table 4 sets out the floorspace of the retail units apportioned to convenience and comparison goods floorspace. It is necessary to make an assumption at this stage as a retailer is not known regarding the net sales area of the store. The split between comparison and convenience goods is estimated to be 10%/90%.

The ratio between net to gross has been assessed at 70/30 based on the type of retailers that would be interested in a scheme of this nature.

- 4.61 As with sales floorspace an estimate has had to be made in respect of the sales density that is likely to be achieved by the proposed floorspace, as at present there are no named retailers for the units. If the unit is occupied by a discount retailer the turnover per square metre would be much lower than that demonstrated in Table 4, however a figure of 10,000 per sq. m has been assessed in order to be robust. The sales density is slightly lower than would be expected for a high-end food retailer however, to reflect the fact that with so many competing food-stores, particularly the new Sainsbury's opposite the application site, any retailer selling similar goods is likely to trade below its company average. Likewise for comparison goods an estimate has been made based on the likely operators that would be interested in the unit if planning permission is granted.
- 4.62 The turnover of the proposal at 2013 is estimated to be approximately £14 million, of which almost £9 million is convenience goods. As emphasised above, a large proportion of the comparison goods floorspace already has planning permission on the site adjacent which is also owned by the applicant (group company). If the proposals were assessed as an uplift on this baseline, the turnover of the proposal would be approximately £9 million. However, the retail impact assessment proceeds to analyse the turnover of the proposals in total.
- 4.63 With growth in sales density in line with Experian's forecast set out in their Retail Planner Briefing Note 10.1 the turnover on the uplift in floorspace from the existing to the proposed rises to £9 million by 2018 for convenience goods and to £15 million in total for all classes of goods. The tables have not allowed for the fact that it will take some time for shopping patterns to stabilise, hence the estimate of trade diversion within the first couple of years is overstated as it will take time for any retailer to get trading levels up to their peak.

Survey Derived Turnover of Convenience and Comparison Store (table 5a and 5b)

- 4.64 Table 5a and 5b set out the anticipated turnover of the existing stores within the Study Area, which are derived from the household survey. In this instance on the basis that the Council's household survey extends beyond the catchment area, it has been possible to take account of inflow from outside the catchment area. What has not been taken into account which is a very relevant consideration for a town like Littlehampton is the impact of tourist expenditure as this is difficult to quantify within the retail model. This important factor should be considered when interpreting the findings from the trade diversion estimates.
- 4.65 In terms of convenience turnover Rustington has a turnover of £12.31 million in 2015 increasing to £12.86 million by 2018. Littlehampton has a turnover of £18.99 million in 2015 rising to £19.83 million by 2018. On account of a number of large supermarkets recently opened the level of convenience expenditure retention in the catchment area is high. It should be noted that household surveys will underestimate the amount of spending the goes to local shops and speciality retailers owing to the nature of the questions asked. It is considered for these shops that provide top-up functions, that the level of trading is much higher than a household survey would suggest. Site visits to the town centre suggest these shops are busy and trading well.
- 4.66 In respect of comparison turnover Rustington has a turnover of £16.89 million at 2015 rising to £18.6 million by 2018. Littlehampton has a turnover of £21 million at 2013 rising to £23 million by 2018. There is however a high degree of leakage of shoppers for comparison goods shopping.

Trade Draw (Table 6)

- 4.67 Table 6 sets out the trade draw of the proposed units which assesses from where the units' turnover will be drawn. Due to the extent of the Study Area we have assumed that none of the annual turnover of the floorspace will be derived from shoppers outside the catchment.

- 4.68 Zone 13 and 14 being the central zones covering the site is expected to take the majority (60%) of the trade.
- 4.69 The assumptions for trade draw have been loosely based on the existing trading patterns of similar stores in the catchment area, and having regard to proximity to existing facilities that serve the catchment area. At present the occupiers are not named, however, the proportion coming from outer zones could be higher if a particular retailer is not represented on the periphery of the catchment for example. The trade draw adopted is considered to be conservative and therefore a robust estimate of where the retail units will draw their trade.

Benchmarks of Convenience Stores (Table 7)

- 4.70 Table 7 provides a benchmark turnover of existing convenience stores within the Study area based on information contained within the Council's retail study. As stated the actual level of trading of the top up stores is understated on account of the limitations of household surveys in capturing this information.

Assessed Pattern of Trade Diversion – Convenience and Comparison Goods (Table 8 and 9)

- 4.71 Tables 8 and 9 provide the assessment of trade diversion at 2015 and 2018 respectively for both convenience and comparison goods. This step of the assessment examines the effect of impact in terms of the levels of trade that will be diverted to the proposed retail units, and which stores it will be diverted from. As outlined previously this has been assessed for both convenience and comparison goods irrespective of the fact that planning permission for the comparison goods floorspace already exists.
- 4.72 In terms of the smaller shops and speciality shops within the study area that are located within the town centres, turnover diverted from these stores would be minimal on account of difference in retail offer. Regardless, the percentage diversion appears high on account of their lower starting turnover. Accepting that like-affects-like, the main draw to the store will be from large shops both for comparison and convenience goods. There will be very little trade drawn

from the small independent shops in the study area. This is an approach advocated within the PPS4 practice guidance at paragraph D.30 which states:

“There is a general assumption that ‘like affects like’ so for example, in an area already served by large modern food-stores, the effects of a new large food supersite are likely to fall disproportionately on the existing competing stores. Their proportional impact on local independent retailers, or discount food-stores for example may be less”

- 4.73 For comparison trade the greatest amount of trade will be from higher order centres and existing retail parks.

**Assessment of Solus Impact – Convenience and Comparison Goods
(Table 10a/b and 11 a/b)**

- 4.74 At tables 10a and 10b we have assessed the likely level of trade diversion from the existing stores and compared their turnover after the proposal in terms of convenience turnover. This enables an understanding as to whether the proposal will lead to a significant impact upon the turnover of existing stores. The analysis has been conducted for the design years of 2015 and 2018, which reflects the guidance of Paragraph 26 of the NPPF and also acknowledges that the process to obtain planning permission, construction the buildings and achieving a settled trading pattern could take up to five years to complete. It should be noted that for those centres that are located on the periphery of the catchment or outside the catchment their stores will have a large amount of inflow. On this basis for example, whilst the tables show that the convenience proposals will have a 10% impact on Waitrose in Chichester, in reality, the impact will not be this large on the basis that the application catchment area does not form a large proportion of the Waitrose Chichester catchment area.
- 4.75 Tables 11a and 11b assess the likely level of trade diversion from the existing stores compared to the position after the proposal is implemented. The impact on Rustington and Littlehampton is limited on account of the baseline position whereby a large proportion of people living in the catchment area travel further afield for comparison shopping purposes. None of the impact on town centres for

comparison turnover is considered to be at a level which would give rise to concern in the light of the low monetary levels of trade diversion, and furthermore it has been noted that planning permission has already been granted for this scale of floorspace. The vast majority of impact will be on out of centre retail warehousing provision.

- 4.76 Paragraph 2.4 of the Practice Guidance states that “when assessing qualitative need, assess whether there is provision and distribution of shopping and other services which allow genuine choice to meet the needs of the whole community, and take into account the degree to which shops maybe overtrading and where there is a need to increase competition and retail mix.” Whilst there is no evidence to show that the town centre shops are over-trading there are some gaps in terms of availability to a range and choice of goods, especially for comparison goods but also for convenience. Furthermore the provision of improved choice can lead to wider benefits for consumers. The Practice Guidance states that “competition between firms increases choice for consumers, and can result in productivity and efficiency gains which in turn lowers the price of goods and services.”

Summary of Combined Impact on Study Area Centres at 2015 and 2018 (Table 12 a and Table 12 b)

- 4.77 Table 12a is the main summary impact table for the purpose of this assessment. The table indicates the combined convenience and comparison impact of the proposal on centres within the study area. The largest impact is on Littlehampton town centre at 2.98% in 2015 falling to 2.53% in 2018. The next centre with the greatest impact is Rustington at 2.19% in 2015 falling to 1.94% in 2018. The impact on Bognor Regis does not take into account the expenditure that the centre receives from outside the catchment area. For all centres no account has been taken of the expenditure that stores receive from tourists, which for towns of this nature is a very important part of the local economy. Likewise the overall impact does not take account of the contribution of expenditure from non-A1 uses to town centre viability, including restaurants and leisure uses for example.

- 4.78 Table 12b has been provided for indicative purposes to demonstrate how the impact would be affected if only the uplift in floorspace is considered. On this basis the impact on Rustington and Littlehampton will be 1.88% and 2.29% respectively at 2018. As above this does not take into account the expenditure accruing to the centres from non A1 services, which for centres of this nature are a significant part of the town centre offer including restaurants, cafes and leisure uses.

Cumulative Impact

- 4.79 In preparing this retail assessment, this study has taken into account a number of retail commitments, and has also taken into account the various studies and audits that supported each proposal.

NLP Retail Assessment for CountryFayre

- 4.80 The Retail Assessment prepared by NLP in March 2010 took account of the following commitments:
- Sainsbury's Rustington – planning permission for an extension to the existing food store of 1,561 sq. m
 - Rustington Retail Park – planning permission for the demolition of the existing focus unit (3,252 sq. m gross) and the construction of three new retail units with a total internal floor area of 5,128 sq. m.
 - Tesco, West Durrington – planning permission for the redevelopment of the existing District Centre to provide a new District Centre incorporating a Tesco superstore (10,245 sq. m gross) shopper café, unit shops, community centre and associated car parking.
 - Tesco, Broad Piece – planning permission for an extension to the existing food-store of 1,039 sq. m net (871 sq. m sales floorspace / 168 sq. m enhance checkout/customer service area)

- Lidl, Littlehampton – planning permission for the redevelopment of the Travis Perkins site to include a Lidl food-store of 1,686 sq. m gross/ 1,286 sq. m net.

4.81 The CountryFayre Proposal identified that the convenience turnover of Littlehampton town centre was forecast to increase by over 5% as a result of the committed Lidl store increasing the town centre's turnover. Therefore the town centre's forecast convenience turnover will increase notwithstanding the modest solus impact arising from the CountryFayre proposal. Rustington town centre was expected to experience a cumulative impact of around 10% (of which CountyFayre was expected to account for less than one third). The majority of the diversion was expected to arise from the committed extension at the Sainsbury's Store Rustington, and this level of impact was considered acceptable by Arun District Council in granting permission. The other smaller centres within Arun were forecast to experience relatively low diversion levels such that the impact on any one centre was likely to be small and not harmful.

4.82 Beyond Arun District, Worthing town centre was forecast to experience an impact of around 1.5% which is negligible in the context of the sub-regional town centre. West Durrington was forecast to experience a larger convenience diversion at 8.2%. However, this was said to be counter balanced by the significant private sector investment in the centre in the form of the Tesco Extra store that at the time the report was written was under construction. It should be noted that Worthing Borough Council did not raise objections to the application and therefore were not concerned about the diversion from centres in Worthing.

Quod Retail Assessment for Morrisons, The Wick

4.83 A more recent cumulative impact assessment was undertaken by Quod in relation to the Wick Site at Littlehampton. Quod prepared a sensitivity scenario (Ref: Table 29) to demonstrate the cumulative impact of the floorspace proposed in addition to other commitments. This demonstrated that the majority of the impact will be to the east of the Morrison's application catchment on those destinations modelled within the Quod RIA. Quod noted that there are a number

of retail stores that are modelled within the NLP assessment which lie outside the Wick catchment and as such it was not considered appropriate to include these within the assessment.

- 4.84 The Quod assessment concludes that the cumulative impact on Littlehampton was 2.97%, the impact on Rustington within the east of the Wick site's catchment was estimated higher at 5.11%. Both of these figures were judged within the range of impact which is considered acceptable. The Quod impact assessment did not provide an assessment of trade diversion in respect of comparison goods.
- 4.85 From a review of the Committee report relating to the Morrisons application at the Wick it would seem that the concerns regarding Quod's retail assessment had not been fully resolved, however, notwithstanding this level of impact was considered to be acceptable:

"We conclude that the impact of the proposal on Littlehampton town centre will be considerably more than estimated by Quod. We recognise that the Council requires more guidance than this, but we are in some difficulty in providing it. Based on our earlier work, and taking account of the different scale and operator, we judge on a rough basis that the total impact on the town centre (Littlehampton) might be more like 5%. Taking account of the increased turnover of the town centre resulting from the Waitrose take-over of the Co-op might reduce this to about 4% when allowance is made for the trade diversion from Sainsbury. The cumulative impact, including the Sainsbury extension and the CountryFayre / Asda is much more difficult to judge, but these developments are going to raise it to 6 or 7% and possibly more....In relation to Wick centre, we consider that a large food-store nearby will have a significant impact on some of the most significant shops in the centre, particularly the Co-op, mini-market There is in our view a distinct risk that some shops would close and there would be a loss of a choice and a reduction in the quality of the offer within the centre. However, as we noted in our January 2011 report there would be a considerable improvement overall in the range and choice of shops for local residents. Some shops might gain from linked trips between

the food-store and the centre, but this is unlikely to compensate for the number of people who stop visiting the centre. In coming to this conclusion, we are aware of the support of the local trader association for the scheme, but district centres have suffered most from supermarket competition and in our experience there are very few thriving centres near supermarkets. The amount of local retail spending is limited and this would be split between the food-store and existing shops. We consider that in balancing the advantages and disadvantages of the proposal the Council and Members should be aware of the likelihood of an adverse impact on Wick centre. Overall, and bearing in mind the cumulative impact of the proposals and existing commitment, we consider that the decision is finely balanced. There would be advantages in widening the choice of food shopping available to residents and benefits in terms of regeneration and job creation (which we have not considered in detail), but also adverse impact on both the town and Wick centres. It is in our view a decision that only the Council should make and could reasonably determine either way depending on the weight it gives to different factors."

Assessment of Schemes on Rustington Retail Park

4.86 In July 2011 planning permission was granted for the variation of Condition 4 attached to the original planning consent for the retail park (R/194/87) to allow for the sale of good within the Focus retail unit and for the alterations to the external elevations and construction of a new mezzanine comprising 465 sq. m of retail floorspace. The planning application was accompanied by a Planning Statement by Chase and Partners LLP (January 2011). The planning application allows for the sub-division of the existing Focus DIY unit to create two separate units as follows:

1. 1,579 sq. m non-food retail warehouse and offices;
2. 1,394 sq. m ground floor convenience and new mezzanine comprising 465 sq. m.

- 4.87 In response to the Retail Statement the District Council's Retail Consultant made the following comments:

"I am satisfied that the application is in accordance with Planning Policy and National Guidance and should be approved. The key issues have been; the definition of the Primary Catchment Area, the need for the development based on the population and expenditure in the catchment and the impact of the scheme on existing centres. I accept that the scale of the proposal is reasonable in terms of expenditure available within the catchment and that its likely future impact is within the bounds of reasonable competition. On this basis I recommend that Planning Permission should be granted." [as contained within the Planning Officer's Report].

Sainsbury's Rustington Retail Park

- 4.88 Sainsbury's obtained planning permission for a knock down and rebuild of its store, the construction of which is nearly complete and should be open for trading in the near future. In securing the consent the applicant agreed to revoke without compensation the food consent discussed above.
- 4.89 A Retail Study for Arun District Council was published in April 2013, based on a household survey undertaken in December 2012. As a consequence the base trading patterns take into account a number of the developments discussed above as commitments. The following remain as commitments for the purposes of this cumulative exercise:
- R/10/11 Ex-Focus Rustington Retail Park
 - R/210/11 Rustington Retail Park
 - R/59/12 – Sainsbury's Redevelopment
 - LU/517/04 Littlehampton Covered Market
 - LU/217/04 Morrisons

- BE/75/12 Bognor Regis Retail Park

- 4.90 Table 13 of Appendix 2 details the estimated turnover of commitments by reference to the information contained within the Council's retail study. It is considered that this table overstates the turnover of commitments, as the Council's retail study shows that the out-of centre stores within the catchment area under-performing relative to national company averages. The figure for the Sainsbury's redevelopment turnover has been amended to reflect the consultant's assessment in the audit of application reference R/59/12. DPDS assumed in the audit that the extension would trade at about 50% below company average for convenience goods.
- 4.91 Table 14 updates the solus impact assessment to take account of the commitments identified in Table 13. On the basis of this cumulative assessment the combined impact on Littlehampton is shown to be 8.77% at 2015 reducing to 8.02% by 2018. The equivalent figures for Rustington are 11.58% and 10.94% respectively. These figures are considered to be a worst case scenario, on account of the fact that the commitments are competing for the same customers that are currently shopping at the town centre. In reality these diversion figures are a zero-sum game rather than an exponential impact, and the result will be reduced turnovers of the resulting committed out-of-centre supermarkets rather than a decrease in the town centre turnover.
- 4.92 It should be noted that the landowner of the application site also has very significant land ownership interests within Rustington Town Centre. It follows that the landowner does not perceive that the current proposals would result in any harm for the town centre, as this would in turn be commercially harmful to the applicant.
- 4.93 In respect of Rustington it should be noted that the application for the redevelopment of the Sainsbury's at Rustington Retail park resulted in the commitment of Sainsbury's to retain a store within the town centre for a period of five years. The continuation of trade of the Sainsbury's store will retain one of the key retail anchors for Littlehampton Town Centre, and will continue to contribute positively to the overall retail offer of the centre.

Impact on Existing, Committed and Planned Investment

- 4.94 We are not aware of any retail proposal either planned or committed in respect of the town centres within the catchment area. The trade diversion outside of the catchment area is minimal and therefore would not have an impact on development coming forward in centres such as Bognor Regis or Chichester. The only intention to develop retail within the town centre has been promoted by the applicant. The proposed development would not prevent an application coming forward on the Chandlers Garage site, indeed it is intended to submit a revised application shortly to respond to issues raised in respect of transport and design.

5.0 THE SEQUENTIAL APPROACH

5.1 The NPPF (paragraph 24 states that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date local plan. They should require applications for main town centre uses to be located in town centres then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. Paragraph 24 explicitly states that “when considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.” The general requirements of the sequential approach to site selection are set out in the PPS4 practice guidance. A sequential assessment has been undertaken to examine sites in terms of their:

- Likelihood of becoming available within a reasonable period of time;
- Suitability for the proposed development; and
- Availability for the proposed use.

5.2 The Practice Guidance identified that the first stage of the sequential assessment is to establish an area of search: it states at paragraph 6.22 that: “When considering applications, LPA’s will need to consider the extent of the catchment area likely to be served by the proposal, and to then identify alternative sites located in existing centres within the catchment area. This will determine whether sites in other nearby centres may represent more appropriate locations in which to accommodate the scale and form of the development proposed.” The application primary catchment area has been established using survey evidence from the Council’s retail study around the likely catchment of retail units of the size and nature proposed by this planning application.

5.3 The starting point for defining the area of search for the sequential assessment is the need for the development and the area it is intended to serve. The search for sites has been limited to the Rustington/Littlehampton area on the basis of limiting the sequential assessment to areas where commercial requirements exist, on account of consumer demand. Whilst there is a requirement to show

flexibility, there is a realisation that retailers can not be reasonably expected to adapt their business model in order to fit onto more constrained sites, making them less competitive. The commercial reality being that the units will not occupy smaller floor-plates if larger ones can not be found.

- 5.4 A Supreme Court Decision in relation to Tesco and Dundee Council is relevant to the sequential approach in respect of suitability. Paragraph 28 of the judgement states " ...to refuse an out of centre planning consent on the grounds that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer." More recently in a High Court judgement case brought about by Zurich Assurance Limited/Threadneedle Property Investment vs North Lincolnshire Council it was concluded that:

"It is also important to mark that developers, and planning authorities, work in a real world. Marks & Spencer had assessed the only available town centre alternative to the site, and had concluded that a development that was smaller than that proposed, or one with a more restricted range of goods, was neither commercially viable nor suitable for their commercial requirements ...on the basis of that assessment ...the Officer and Committee know that, if this planning permission was refused then Marks & Spencer would not locate into Scunthorpe..." (paragraph 61-63).

- 5.5 On the basis of the above, it is accepted that when determining retail applications, the specific circumstance of the case will determine the sequential test parameters. In this instance, when considering what constitutes a 'suitable' site, the need that the proposal is intending to serve and the nature of the scheme provided is fundamental to the determination of whether a site is suitable.
- 5.6 The scope of sites to be assessed has been put forward by Arun District Council as follows:

- Vacant Units – Littlehampton and Rustington

- St Martin's Car Park - Littlehampton
- Chandlers Mini Site – Rustington
- Rustington Retail Park

Vacant Units

- 5.7 The health checks found a limited number of units in the main centres within the catchment area. All of the vacant units identified were not suitable for the proposed development in terms of scale. The only site that is large enough in size terms to accommodate the development is the Littlehampton Covered Market Site. This site is not available for development and is due to be developed for residential-led mixed use development. The retail floorspace incorporated within the mix of uses is not compatible with the scale of retail development sought as part of this application.

Rustington

- 5.8 The Chandlers Garage site is considered to be an available sequential site. However this site is not considered suitable for the development proposed. The applicant has tried to secure planning permission on this site, however, proposals have had to be revised to accommodate design concerns from planning officers and transport concerns. Revised proposals for a smaller scale retail unit are due to be submitted shortly, however the scale of floorspace proposed would not be adequate for the retailer demand that the current proposals are seeking to fulfil.
- 5.9 On this basis, whilst the site is considered to be available within a reasonable time period, it is not suitable for development on account of the scale of retail development proposed. Two applications have been submitted on the site for one A1 retail unit. On both occasions the applications have been withdrawn. In the first instance the application was to be refused under delegated powers, and in the second instance, the application went to committee with a recommendation for refusal. The applicant for the current application was also

the applicant for the Ash Lane application, and tried very hard to develop a store of the scale required in this location in the first instance. The Officer's report to committee read as follows:

" The proposed retail unit would be single storey with a curved roof profile and would be located in a similar position to the existing building in terms of distance to the site frontage, but it would cover a much greater site area. The floor area would more than double... would have no space surrounding the site except the limited loading area to the rear and car parking to the front. The design of the proposed replacement retail unit would be a of a modern warehouse style which given its size and site coverage would appear as an alien feature in this location and would be out of keeping with the existing 1950s shopping parade which is comprised of more traditional style buildings with brick elevation and tiled roofs. The unit would have timber and Tespa clad elevation to the front. The long side elevation facing the access road, which would be visible from the site frontage, would be at odds with the existing character of the area and would sit uncomfortably in the street scene contrary to Policy GEN7 (ii). The site is located at the end of the retail parade in a position where the scale of units would be expected to be reduce rather than increase, adjacent to residential units."

- 5.10 In addition to the above, there were some outstanding concerns from WSCC which needed to be addressed.
- 5.11 Faced with this position the applicant has secured a potential tenant for a smaller scale of floorspace on the Ash Lane site, and an application will be submitted shortly for a smaller scale of floorspace. The current application seeks to accommodate the development scale proposed.

Littlehampton

- 5.12 The Littlehampton development brief was prepared by consultants on behalf of the District Council in 2009 and contained aspirations for a new anchor

convenience store within the town. However, with the opening of the Waitrose store, replacing the Coop, it is our understanding that these aspirations have been realigned toward a mixed use retail and leisure scheme. Arun District Council's Regeneration Sub-Committees (which met to discuss the future of Littlehampton town centre on 25th October 2011) highlighted that the presence of the Waitrose store is a major boost for Littlehampton in terms of further investment, but also identified that it is now unlikely that a food-store will be secured at St Martins car park as initially proposed in the Littlehampton Vision Development Brief. Furthermore in recent planning applications, the Council's officers have accepted that the site does not provide a sequentially preferable site for a food-store.

- 5.13 It is concluded that there are no suitable, or available sequentially preferable sites in Rustington or any nearby identified centres, and the proposed development satisfies the sequential approach to site selection required in both local and national planning policy.
- 5.14 In summary we have looked at relevant sites within Rustington to assess their suitability for the retail floorspace proposed. Our sequential assessment found that there are no sites within or adjacent to the Primary Shopping Area that can accommodate the growth proposed.

Rustington Retail Park

- 5.15 The Former Focus unit, that has been occupied on a temporary basis by Sainsbury's will shortly be available for reoccupation. However this site can be considered not sequentially preferable for a number of reasons. In the first instance it is not agreed that this site is more sustainable, the application site is a short walk away from the Rustington Retail Park, and on account of the pedestrian and cycle linkages proposed will also benefit from the same sustainability benefits. However, the site can be discounted for a number of additional reasons.

- 5.16 The applicant is the landowner for the Rustington Retail Park site, and it is known that this unit is not available in sequential terms. Store Property Investments Limited has secured a tenant for this unit and the agreement is close to being finalised for this to be taken. The site is also considered unsuitable on account of its size. The site can not accommodate the scale of floorspace required, and furthermore could not provide enough floorspace for the total application proposal including Chandlers. It follows that the approved planning applications for the existing retail park do not represent a sequentially preferable site.

Summary

- 5.17 In summary we have looked at relevant sites within Rustington to assess their suitability for the retail floorspace proposed. Our sequential assessment found that there are no sites within or adjacent to the Primary Shopping Area that can accommodate the growth proposed.

6.0 CONCLUSIONS

- 6.1 This statement has focused on the retail economic implications of the proposed new retail units at Land west of Mill Lane, and has assessed the proposal against the retail tests set out in national and local policy.
- 6.2 As part of the assessment the 'health' of nearby town centres including Rustington and Littlehampton have been considered and it is concluded that both are vital and viable town centres.
- 6.3 An assessment of impact on centres in the Study Area demonstrates that the proposed new retail units would not have a significant adverse impact on town centres in the Study either on a solus basis or a cumulative basis. Given the intention to revoke the existing consent for non-food floorspace on the adjacent Rustington Retail Park site, the only component of the new floorspace proposed, which does not currently benefit from planning permission is for food floorspace. The rationale for the development is that there is a good deal of interest in the catchment area which can not fit on sites within the town centre.
- 6.4 No suitable or available sites have emerged since a number of similar applications have been considered by Arun District Council, it therefore can be concluded that this site is the most sequentially preferable site for the development.
- 6.5 Whilst the operators for the units have not been confirmed they will be retailers that are new facias to the Littlehampton/Rustington area. The type of retailer that would be interested in the comparison unit is likely to either sell goods that are bulky in nature, or requires a format that involves the necessity to display or store goods in a particular way. On this basis the applicant is content to accept a restriction on subdivision and also a restriction on the classes of goods that can be sold.

- 6.6 The primary concern of Arun District Council is the protection of Littlehampton Town Centre and Rustington Centre. The proposed development would not result in a significant adverse impact on either of the centres.
- 6.7 Given the above, we can conclude that the proposed development is in accordance with relevant national and local retail planning policy.

APPENDIX 1
CATCHMENT PLAN

Additional information:	
Key Survey Zones Centres 1 - Rustington 2 - Littlehampton 3 - Worthing 4 - West Durrington 5 - Goring Road 6 - Arundel 7 - Bognor Regis 8 - Chichester Stores 1 - Sainsburys, New Road 2 - Tesco, Broadpiece 3 - Sainsburys, Lyons Farm 4 - Asda, Ferring 5 - Morrisons, Wick N	
Project title:	
Arun	
London Cheltenham Kettering Newark Birmingham www.cgms.co.uk Planning & Development Archaeology & Historic Buildings	
Scale at A3: 1:100,000	
Date printed: 15.08.13	Drawn by: LW Checked by: SW

Figure xx: xxxxxxxx

APPENDIX 2

RETAIL IMPACT TABLES

Table 1: Population

Year	2011	2012	2013	2014	2015	2016	2017	2018	2021	2026	2031
Zone											
7	5655	5721	5788	5855	5922	5990	6056	6123	6324	6586	6837
9	2714	2745	2778	2810	2842	2874	2906	2939	3035	3161	3281
10	4594	4648	4702	4757	4811	4866	4920	4975	5138	5351	5554
11	62062	62577	63151	63746	64352	64970	65585	66204	68115	70737	73115
12	7453	7540	7628	7717	7805	7894	7982	8070	8335	8680	9010
13	27924	28250	28582	28914	29244	29577	29907	30238	31230	32523	33760
14	21891	22147	22407	22668	22926	23187	23446	23705	24483	25497	26466
15	7364	7450	7538	7625	7712	7800	7887	7974	8236	8577	8903
Total	139657	141078	142574	144092	145614	147158	148689	150228	154896	161112	166926

Notes:

Source: 2011 Experian Retail Planner December 2012

Forecast years = 2011 adj x ONS district growth rates; 2011-2021 - ONS 2011 based forecasts; 2021-2031 ONS 2010 based forecasts.

Table 2a: Expenditure Per Head - Convenience Goods

Year	2011	2012	2013	2014	2015	2016	2017	2018
Zone								
7	1967	1898	1896	1891	1887	1889	1896	1906
9	2235	2157	2155	2148	2144	2146	2155	2165
10	2113	2039	2037	2031	2027	2029	2037	2047
11	1929	1861	1860	1854	1850	1852	1860	1869
12	2070	1998	1996	1990	1986	1988	1996	2006
13	1851	1786	1784	1779	1776	1777	1784	1793
14	2019	1948	1946	1941	1937	1939	1946	1956
15	2125	2051	2049	2042	2038	2040	2049	2059

Notes: Source: 2011 Experian Retail Planner December 2012
Growth rates exclude 30% SFT - Retail Planner Briefing Note 10.1 Appendix 3

Table 2b: Expenditure Per Head - Comparison Goods

Year	2011	2012	2013	2014	2015	2016	2017	2018
Zone								
7	2939	2942	2954	2980	3028	3095	3156	3226
9	3485	3488	3502	3534	3591	3669	3743	3825
10	3109	3112	3125	3153	3203	3274	3339	3413
11	2891	2894	2905	2932	2979	3044	3105	3173
12	3009	3012	3024	3051	3100	3168	3232	3303
13	2671	2674	2684	2709	2752	2812	2869	2932
14	2852	2855	2866	2892	2938	3003	3063	3130
15	3323	3326	3340	3370	3424	3499	3569	3647

Notes: Source: 2011 Experian Retail Planner December 2012
Growth Rate excl 75% SFT - Retail Planner Briefing Note 10.1 Appendix 3

Table 3a: Total Expenditure - Convenience Goods (£m)

Year	2011	2012	2013	2014	2015	2016	2017	2018
Zone								
7	11.12	10.86	10.97	11.07	11.17	11.32	11.48	11.67
9	6.07	5.92	5.99	6.04	6.09	6.17	6.26	6.36
10	9.71	9.48	9.58	9.66	9.75	9.87	10.02	10.18
11	119.72	116.46	117.46	118.19	119.05	120.32	121.99	123.74
12	15.43	15.06	15.23	15.36	15.50	15.69	15.93	16.19
13	51.69	50.45	50.99	51.44	51.94	52.56	53.35	54.22
14	44.20	43.14	43.60	44.00	44.41	44.96	45.63	46.37
15	15.65	15.28	15.45	15.57	15.72	15.91	16.16	16.42

Notes: Table 1 x Table 2 a

Table 3b: Total Expenditure - Comparison Goods (£m)

Year	2011	2012	2013	2014	2015	2016	2017	2018
Zone								
7	16.62	16.83	17.10	17.45	17.93	18.54	19.11	19.75
9	9.46	9.57	9.73	9.93	10.21	10.54	10.88	11.24
10	14.28	14.46	14.69	15.00	15.41	15.93	16.43	16.98
11	179.42	181.10	183.45	186.90	191.70	197.77	203.64	210.07
12	22.43	22.71	23.07	23.54	24.20	25.01	25.80	26.66
13	74.59	75.54	76.71	78.33	80.48	83.17	85.80	88.66
14	62.43	63.23	64.22	65.56	67.36	69.63	71.82	74.20
15	24.47	24.78	25.18	25.70	26.41	27.29	28.15	29.08

Notes: Table 1 x Table 2b

Table 4: Turnover of Proposal

	Net floorspace	Sales Density (£/sqm)			Turnover (£million)		
	Sq. M	2013	2015	2018	2013	2015	2018
Convenience	882	10000	10017.7	10047.2	8.82	8.84	8.86
Comparison	98	4000	4169.44	4439.48	0.39	0.41	0.44
Comparison	1302	4000	4169.44	4439.48	5.21	5.43	5.78
Total					14.42	14.67	15.08
Total minus subtraction of fallback					9.49	9.74	10.15

Notes:

- 90:10 conv/comp split assumed for supermarket
- 70:30 net to gross ratio assumed
- Sales density based on average within DPDS study for convenience
- Sales density discounted from DPDS average to reflect location of retail unit and therefore likely sales density
- Turnover of commitment for Rustington Retail Park taken from DPDS retail study.

Table 5a: Turnover of existing stores in catchment area (convenience)

	Survey Derived Turnover from Catchment Area at 2013 (£m)										
	7	9	10	11	12	13	14	15	Total		
Co-op, Arundel	0.05	0.03	1.83	0.00	0.00	0.00	2.10	0.00	4.01		
Local Shops Arundel	0.05	0.03	0.53	0.52	0.00	0.00	0.00	0.00	1.13		
Co-op, Hawthorne Road, Bognor Regis	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.03		
Iceland, Queensway, Bognor Regis	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.06		
Lidl, Peel Centre, Shipney, Bognor Regis	0.10	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.13		
Morrisons, Bognor Regis	0.58	0.06	0.10	0.00	0.00	0.00	0.00	0.00	0.74		
Local Shops Bognor Regis	0.00	0.00	0.00	0.52	0.00	0.00	0.00	0.00	0.52		
Sainsbury's, Bognor Regis	0.64	0.17	0.10	1.10	0.00	0.22	0.00	0.00	2.23		
Tesco, Shipney, Bognor Regis	0.21	0.37	0.00	0.00	0.00	0.00	0.00	0.00	0.58		
Co-op, Wick Street, Littlehampton	0.00	0.00	0.00	0.00	0.00	1.34	0.00	0.00	1.34		
Lidl, Littlehampton	0.05	0.00	0.15	0.00	0.00	0.22	0.00	0.23	0.23		
Sainsbury's, Littlehampton	0.36	0.06	0.00	0.00	0.15	2.70	0.42	0.00	3.69		
Waitrose, Littlehampton	0.77	0.14	1.09	0.00	0.00	6.30	1.45	0.39	10.14		
Iceland, Surrey Street, Littlehampton	0.00	0.00	0.20	0.00	0.00	0.45	0.00	0.14	0.79		
Tesco Express, Finistere Way, Littlehampton	0.00	0.00	0.00	0.00	0.00	1.56	0.00	0.00	1.56		
Local Shops, Littlehampton	0.00	0.03	0.00	0.00	0.00	0.45	0.00	0.00	0.48		
Sainsbury's, New Road, Rustington	0.00	0.00	0.54	1.04	3.31	5.92	14.38	7.40	32.59		
Tesco, Broadpiece, Littlehampton	4.03	0.60	2.32	0.00	0.07	22.62	3.55	1.30	34.49		
Co-op, Broadmark Lane Rustington	0.00	0.00	0.00	0.00	0.13	0.22	2.90	0.41	3.66		
Iceland, Churchill Parade, Rustington	0.00	0.00	0.00	0.00	0.21	1.18	3.22	0.39	5.00		
Tesco Express, Sterling Parade, The Street, Rustington	0.00	0.00	0.00	0.00	0.00	0.22	1.16	0.00	1.38		
Local Shops, Rustington	0.00	0.00	0.00	0.00	0.00	0.45	1.35	0.25	2.05		
Co-op, Ferring Street, Ferring	0.00	0.00	0.00	0.00	1.08	0.00	0.00	0.00	1.08		
Local Shops Ferring	0.00	0.00	0.00	0.00	0.40	0.00	0.00	0.00	0.40		
Asda, Ferring, West Worthing	0.11	0.11	0.20	8.18	1.01	4.52	6.45	1.03	21.61		
Co-op, The Square, Angmering	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.74	0.74		
Marks and Spencer, BP, Worthing Road, Rustington	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.08		
One Stop, North Lane, Littlehampton	0.00	0.00	0.00	0.00	0.00	0.22	0.00	0.00	0.22		
Local Shops Angmering	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.33	0.33		
Marks and Spencer, Chichester	0.05	0.17	0.00	0.00	0.00	0.00	0.19	0.00	0.41		
Waitrose Chichester	0.05	0.63	0.44	0.00	0.00	0.00	0.00	0.00	1.12		
Lidl, Portfield Way, Chichester	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.06		
Local Shops Chichester	0.00	0.00	0.00	0.00	0.00	0.22	0.00	0.00	0.22		
Sainsbury's Chichester	1.11	1.51	1.09	0.00	0.28	0.00	0.00	0.08	4.07		
Tesco, Fishbourne Road, Chichester	0.00	0.17	0.15	0.00	0.00	0.00	0.00	0.00	0.32		
Co-op, Goring, Worthing	0.00	0.00	0.00	7.88	0.00	0.00	0.61	0.00	8.49		
Iceland, Goring Road, Worthing	0.00	0.00	0.00	3.19	0.21	0.00	0.00	0.00	3.40		
Waitrose, High Street, Worthing	0.00	0.00	0.00	6.61	1.45	0.00	0.00	0.37	8.43		
Co-op, Manor Parade, Salvington Road, Worthing	0.00	0.00	0.00	0.59	0.00	0.00	0.00	0.00	0.59		
Lidl, North Street Worthing	0.00	0.00	0.00	1.10	0.00	0.00	0.00	0.00	1.10		
Marks and Spencer, Montague Street, Worthing	0.00	0.00	0.00	1.10	0.28	0.00	0.42	0.00	1.80		
Morrisons, Newland Street, Worthing	0.00	0.03	0.00	6.55	0.00	0.00	0.00	0.14	6.72		
Tesco Express, Finton Road, Worthing	0.00	0.00	0.00	0.52	0.47	0.00	0.00	0.00	0.99		
Tesco Express, Rectory Road, Salvington, Worthing	0.00	0.00	0.00	0.52	0.00	0.00	0.00	0.00	0.52		
Local Shops, Worthing	0.00	0.00	0.00	3.13	0.00	0.00	0.00	0.08	3.21		
Sainsbury's, Lyons Farm, Worthing	0.00	0.00	0.10	13.11	1.45	0.00	0.00	0.00	14.66		
Tesco, West Durrington, Worthing	0.00	0.06	0.20	51.26	3.33	0.70	1.23	1.26	58.04		
Aldi, Carlton Terrace, Portslade Brighton	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.07		
Co-op, Barnham	0.20	0.36	0.00	0.00	0.00	0.00	0.00	0.00	0.56		
The Trading Post, Barnham	0.05	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.17		
Asda, Speedfields, Newgate Lane, Fareham	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05		
Co-op, Fareham Road, Wickham, Fareham	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.07		
Co-op, Main Road, Yapton	1.14	0.03	0.00	0.00	0.00	0.00	0.00	0.00	1.17		
Co-op, The Boulevard, Nelson Road, Durrington	0.00	0.00	0.00	0.52	0.00	0.00	0.00	0.00	0.52		
Tesco Express, Goring Way, Goring-by-Sea	0.00	0.00	0.00	1.56	0.13	0.00	0.00	0.00	1.69		
Tesco Express, Littlehampton Road, Durrington	0.00	0.00	0.00	1.04	0.00	0.00	0.00	0.00	1.04		
Tesco Metro, London Road, Pulborough	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.10		
Waitrose, Between Streets, Cobham, Surrey	0.00	0.00	0.00	0.52	0.00	0.00	0.00	0.00	0.52		
Waitrose, West Street, East Grinstead	0.00	0.00	0.00	0.00	0.00	0.00	0.19	0.00	0.19		
Local Shops Barnham	0.00	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.09		
Local Shops East Preston	0.00	0.00	0.00	0.00	0.00	0.00	0.58	0.08	0.66		
Local Shops, Finton	0.00	0.06	0.00	0.00	0.27	0.00	0.00	0.00	0.33		
Local Shops, Goring-by-Sea	0.00	0.00	0.00	1.10	0.35	0.00	0.00	0.00	1.45		
Local Shops, Sharphothorne	0.00	0.00	0.00	0.00	0.00	0.00	0.42	0.00	0.42		
Local Shops, Slindon	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.15		
Local Shops, Tarring	0.00	0.00	0.00	1.62	0.00	0.00	0.00	0.00	1.62		
Local Shops, Walberton	0.00	0.39	0.00	0.00	0.00	0.00	0.00	0.00	0.39		
Local Shops, Yapton	0.39	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.42		
Spar, Goring Road, Goring-by-Sea	0.00	0.00	0.00	0.52	0.00	0.00	0.00	0.00	0.52		
Internet/Online	0.86	0.34	0.40	2.73	0.29	0.95	2.52	0.58	8.67		

	Survey Derived Turnover from Catchment Area at 2015 (£m)									
	7	8	10	11	12	13	14	15	Total	
Co-op, Arundel	0.05	0.03	1.86	0.00	0.00	0.00	2.14	0.00	4.08	
Local Shops Arundel	0.05	0.03	0.54	0.53	0.00	0.00	0.00	0.00	1.15	
Co-op, Hawthorne Road, Bognor Regis	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.03	
Iceland, Queensway, Bognor Regis	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.06	
Udd, Peel Centre, Shipney, Bognor Regis	0.10	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.13	
Morrisons, Bognor Regis	0.59	0.06	0.10	0.00	0.00	0.00	0.00	0.00	0.75	
Local Shops Bognor Regis	0.00	0.00	0.00	0.53	0.00	0.00	0.00	0.00	0.53	
Sainsbury's, Bognor Regis	0.65	0.17	0.10	1.11	0.00	0.22	0.00	0.00	2.27	
Tesco, Shipney, Bognor Regis	0.21	0.38	0.00	0.00	0.00	0.00	0.00	0.00	0.59	
Co-op, Wick Street, Littlehampton	0.00	0.00	0.00	0.00	0.00	1.36	0.00	0.00	1.36	
Udd, Littlehampton	0.05	0.00	0.15	0.00	0.00	0.22	0.00	0.23	0.66	
Sainsbury's, Littlehampton	0.37	0.06	0.00	0.00	0.15	2.75	0.43	0.00	3.76	
Waitrose, Littlehampton	0.78	0.14	1.11	0.00	0.00	6.42	1.48	0.40	10.33	
Iceland, Surrey Street, Littlehampton	0.00	0.00	0.20	0.00	0.00	0.46	0.00	0.14	0.80	
Tesco Express, Finistere Way, Littlehampton	0.00	0.00	0.00	0.00	0.00	1.59	0.00	0.00	1.59	
Local Shops, Littlehampton	0.00	0.03	0.00	0.00	0.00	0.46	0.00	0.00	0.49	
Sainsbury's, New Road, Rustington	0.00	0.00	0.55	1.05	3.37	6.03	14.65	7.53	33.18	
Tesco, Broadpiece, Littlehampton	4.10	0.61	2.36	0.00	0.07	23.04	3.62	1.32	35.13	
Co-op, Broadmark Lane Rustington	0.00	0.00	0.00	0.00	0.13	0.22	2.95	0.42	3.73	
Iceland, Churchill Parade, Rustington	0.00	0.00	0.00	0.00	0.21	1.20	3.28	0.40	5.09	
Tesco Express, Sterling Parade, The Street, Rustington	0.00	0.00	0.00	0.00	0.00	0.22	1.18	0.00	1.41	
Local Shops, Rustington	0.00	0.00	0.00	0.00	0.00	0.46	1.37	0.25	2.09	
Co-op, Ferring Street, Ferring	0.00	0.00	0.00	0.00	1.10	0.00	0.00	0.00	1.10	
Local Shops Ferring	0.00	0.00	0.00	0.00	0.41	0.00	0.00	0.00	0.41	
Asda, Ferring, West Worthing	0.11	0.11	0.20	8.29	1.03	4.60	6.57	1.05	21.97	
Co-op, The Square, Angmering	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.75	0.75	
Marks and Spencer, BP, Worthing Road, Rustington	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.08	
One Stop, North Lane, Littlehampton	0.00	0.00	0.00	0.00	0.00	0.22	0.00	0.00	0.22	
Local Shops Angmering	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.34	0.34	
Marks and Spencer, Chichester	0.05	0.17	0.00	0.00	0.00	0.00	0.19	0.00	0.42	
Waitrose Chichester	0.05	0.64	0.45	0.00	0.00	0.00	0.00	0.00	1.14	
Udd, Portfield Way, Chichester	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.06	
Local Shops Chichester	0.00	0.00	0.00	0.00	0.00	0.22	0.00	0.00	0.22	
Sainsbury's Chichester	1.13	1.54	1.11	0.00	0.29	0.00	0.00	0.08	4.14	
Tesco, Fishbourne Road, Chichester	0.00	0.17	0.15	0.00	0.00	0.00	0.00	0.00	0.33	
Co-op, Goring, Worthing	0.00	0.00	0.00	7.99	0.00	0.00	0.62	0.00	8.61	
Iceland, Goring Road, Worthing	0.00	0.00	0.00	3.23	0.21	0.00	0.00	0.00	3.45	
Waitrose, High Street, Worthing	0.00	0.00	0.00	6.70	1.48	0.00	0.00	0.38	8.55	
Co-op, Manor Parade, Salvington Road, Worthing	0.00	0.00	0.00	0.60	0.00	0.00	0.00	0.00	0.60	
Udd, North Street Worthing	0.00	0.00	0.00	1.11	0.00	0.00	0.00	0.00	1.11	
Marks and Spencer, Montague Street, Worthing	0.00	0.00	0.00	1.11	0.29	0.00	0.43	0.00	1.83	
Morrisons, Newland Street, Worthing	0.00	0.03	0.00	6.64	0.00	0.00	0.00	0.14	6.81	
Tesco Express, Finton Road, Worthing	0.00	0.00	0.00	0.53	0.48	0.00	0.00	0.00	1.01	
Tesco Express, Rectory Road, Salvington, Worthing	0.00	0.00	0.00	0.53	0.00	0.00	0.00	0.00	0.53	
Local Shops, Worthing	0.00	0.00	0.00	3.17	0.00	0.00	0.00	0.08	3.25	
Sainsbury's, Lyons Farm, Worthing	0.00	0.00	0.10	13.29	1.48	0.00	0.00	0.00	14.87	
Tesco, West Durrington, Worthing	0.00	0.06	0.20	51.95	3.39	0.71	1.25	1.28	58.86	
Aldi, Carlton Terrace, Portslade Brighton	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.07	
Co-op, Barnham	0.20	0.37	0.00	0.00	0.00	0.00	0.00	0.00	0.57	
The Trading Post, Barnham	0.05	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.17	
Asda, Speedfields, Newgate Lane, Fareham	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	
Co-op, Fareham Road, Wickham, Fareham	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Co-op, Main Road, Yapton	1.16	0.03	0.00	0.00	0.00	0.00	0.00	0.00	1.19	
Co-op, The Boulevard, Nelson Road, Durrington	0.00	0.00	0.00	0.53	0.00	0.00	0.00	0.00	0.53	
Tesco Express, Goring Way, Goring-by-Sea	0.00	0.00	0.00	1.58	0.13	0.00	0.00	0.00	1.71	
Tesco Express, Littlehampton Road, Durrington	0.00	0.00	0.00	1.05	0.00	0.00	0.00	0.00	1.05	
Tesco Metro, London Road, Pulborough	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.10	
Waitrose, Between Streets, Cobham, Surrey	0.00	0.00	0.00	0.53	0.00	0.00	0.00	0.00	0.53	
Waitrose, West Street, East Grinstead	0.00	0.00	0.00	0.00	0.00	0.00	0.19	0.00	0.19	
Local Shops, Barnham	0.00	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.09	
Local Shops, East Preston	0.00	0.00	0.00	0.00	0.00	0.00	0.59	0.08	0.67	
Local Shops, Findon	0.00	0.06	0.00	0.00	0.27	0.00	0.00	0.00	0.34	
Local Shops, Goring-by-Sea	0.00	0.00	0.00	1.11	0.36	0.00	0.00	0.00	1.47	
Local Shops, Sharphorne	0.00	0.00	0.00	0.00	0.00	0.00	0.43	0.00	0.43	
Local Shops, Slindon	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.15	
Local Shops, Tarring	0.00	0.00	0.00	1.64	0.00	0.00	0.00	0.00	1.64	
Local Shops, Walberton	0.00	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.40	
Local Shops, Yapton	0.40	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.43	
Spar, Goring Road, Goring-by-Sea	0.00	0.00	0.00	0.53	0.00	0.00	0.00	0.00	0.53	
Internet/Online	0.88	0.35	0.41	2.77	0.30	0.97	2.57	0.59	8.83	

Table 5b: Turnover of existing stores in catchment area (comparison)

	Survey Derived Turnover from Catchment Area at 2013 (£m)							
	7	9	10	11	12	13	14	15
Arundel	0	0.31	1.5	0	0.16	0	0	0.08
Bognor Regis Town Centre	1.46	0.75	0.54	0.59	0	3.05	0.81	0.27
Bognor Regis Other	1.06	0.48	0.16	0	0	1.75	0.4	0.12
Littlehampton Town Centre	1.32	0.24	0.99	0.28	0.57	12.46	3.39	0.79
Littlehampton Other	0.91	0.19	1.06	1.1	0.4	8.55	4.87	1.01
Rustington	0.11	0.01	0.27	0.51	1.27	2.27	9.23	2.43
Ferring	0.05	0	0.02	2.37	0.67	1.77	0.88	0.15
Arun Elsewhere	0.06	0.06	0.01	0	0.16	0.1	0	0.08
Chichester City Centre	5.46	4.61	5.27	2.46	1.34	6.09	4.85	2.62
Chichester Other	0.64	0.82	1.07	0.92	0.03	1.43	0.24	0.24
Worthing Town Centre	0.45	0.17	0.92	89.47	9.95	16.76	14.37	6.97
Worthing Other	0.03	0	0.12	29.05	1.91	1.05	2.89	2.01
Holmbush/Shoreham	0	0.07	0.02	5.3	0.17	0.42	0.55	0.66
Brighton	0.07	0.03	0.06	8.98	0.93	1.42	1.47	0.81
Portsmouth	0.37	0.03	0.15	1.18	0.06	0.57	0.37	0.04
Elsewhere	0.54	0.26	0.4	8.04	1.01	2.19	3.02	0.89
Internet/Mail Order	4.3	1.55	1.89	30.83	4.08	15.66	15.89	5.6
Total	16.83	9.58	14.45	181.08	22.71	75.54	63.23	24.77

Notes: Source Household Telephone Survey, NEMS December 2012

	Survey Derived Turnover from Catchment Area at 2015 (£m)								
	7	9	10	11	12	13	14	15	Total
Arundel	0.00	0.33	1.57	0.00	0.17	0.00	0.00	0.08	2.15
Bognor Regis Town Centre	1.53	0.79	0.57	0.62	0.00	3.20	0.85	0.28	7.83
Bognor Regis Other	1.11	0.50	0.17	0.00	0.00	1.84	0.42	0.13	4.16
Littlehampton Town Centre	1.38	0.25	1.04	0.29	0.60	13.07	3.56	0.83	21.02
Littlehampton Other	0.95	0.20	1.11	1.15	0.42	8.97	5.11	1.06	18.97
Rustington	0.12	0.01	0.28	0.53	1.33	2.38	9.68	2.55	16.89
Ferring	0.05	0.00	0.02	2.48	0.70	1.86	0.92	0.16	6.19
Arun Elsewhere	0.06	0.06	0.01	0.00	0.17	0.10	0.00	0.08	0.49
Chichester City Centre	5.73	4.84	5.53	2.57	1.41	6.39	5.09	2.75	34.29
Chichester Other	0.67	0.86	1.12	0.96	0.03	1.50	0.25	0.25	5.65
Worthing Town Centre	0.47	0.18	0.96	93.49	10.44	17.58	15.07	7.31	145.51
Worthing Other	0.03	0.00	0.13	30.36	2.00	1.10	3.03	2.11	38.76
Holmbush/Shoreham	0.00	0.07	0.02	5.54	0.18	0.44	0.58	0.69	7.52
Brighton	0.07	0.03	0.06	9.38	0.98	1.49	1.54	0.85	14.41
Portsmouth	0.39	0.03	0.16	1.23	0.06	0.60	0.39	0.04	2.90
Elsewhere	0.57	0.27	0.42	8.40	1.06	2.30	3.17	0.93	17.12
Internet/Mail Order	4.51	1.63	1.98	32.22	4.28	16.43	16.67	5.87	83.58
Total	17.65	10.05	15.15	189.22	23.82	79.25	66.32	25.98	427.45

	Survey Derived Turnover from Catchment Area at 2018 (£m)								
	7	9	10	11	12	13	14	15	Total
Arundel	0.00	0.36	1.73	0.00	0.18	0.00	0.00	0.09	2.37
Bognor Regis Town Centre	1.69	0.87	0.62	0.68	0.00	3.52	0.94	0.31	8.63
Bognor Regis Other	1.22	0.55	0.18	0.00	0.00	2.02	0.46	0.14	4.59
Littlehampton Town Centre	1.52	0.28	1.14	0.32	0.66	14.40	3.92	0.91	23.15
Littlehampton Other	1.05	0.22	1.22	1.26	0.46	9.88	5.63	1.17	20.89
Rustington	0.13	0.01	0.31	0.58	1.47	2.62	10.66	2.81	18.60
Ferring	0.06	0.00	0.02	2.71	0.77	2.05	1.02	0.17	6.80
Arun Elsewhere	0.07	0.07	0.01	0.00	0.18	0.12	0.00	0.09	0.54
Chichester City Centre	6.31	5.33	6.09	2.82	1.55	7.04	5.60	3.03	37.76
Chichester Other	0.74	0.95	1.24	1.05	0.03	1.65	0.28	0.28	6.22
Worthing Town Centre	0.52	0.20	1.06	102.45	11.50	19.37	16.60	8.05	159.75
Worthing Other	0.03	0.00	0.14	33.26	2.21	1.21	3.34	2.32	42.52
Holmbush/Shoreham	0.00	0.08	0.02	6.07	0.20	0.49	0.64	0.76	8.25
Brighton	0.08	0.03	0.07	10.28	1.07	1.64	1.70	0.94	15.82
Portsmouth	0.43	0.03	0.17	1.35	0.07	0.66	0.43	0.05	3.19
Elsewhere	0.62	0.30	0.46	9.21	1.17	2.53	3.49	1.03	18.81
Internet/Mail Order	4.97	1.79	2.18	35.30	4.71	18.10	18.36	6.47	91.89
Total	19.44	11.07	16.70	207.35	26.24	87.30	73.05	28.61	469.77

Table 6: Zonal draw to proposal

Zone	Trade Draw	Convenience			Comparison		
	%	2013	2015	2018	2013	2015	2018
7	4.00%	0.35	0.35	0.35	0.22	0.23	0.25
9	2.00%	0.18	0.18	0.18	0.11	0.12	0.12
10	10.00%	0.88	0.88	0.89	0.56	0.58	0.62
11	7.00%	0.62	0.62	0.62	0.39	0.41	0.44
12	7.00%	0.62	0.62	0.62	0.39	0.41	0.44
13	30.00%	2.65	2.65	2.66	1.68	1.75	1.86
14	30.00%	2.65	2.65	2.66	1.68	1.75	1.86
15	10.00%	0.88	0.88	0.89	0.56	0.58	0.62
Outside Catchment Area	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Total	100.00%	8.82	8.84	8.86	5.60	5.84	6.22

Notes: Pattern of trade draw is based upon CGMS assessment of survey derived existing trading patterns and forecast future trading patterns

Table 7: Trading Performance of Main Food Stores (before trade draw)

	Net Sales Floorspace	Net Convenience	Average Sales Density	Benchmark Turnover	Survey Based Turnover	Difference
	sq. m	sq.m	£ sq m	£m	£m	£m
Littlehampton						
Co-op Wick	538	441	6909	3.05	1.34	-1.71
Iceland	452	425	6200	2.64	0.79	-1.85
Lidl	1286	1029	3099	3.19	1.11	-2.08
Sainsbury	1239	1133	11153	12.64	4.31	-8.33
Tesco	4058	2841	14386	40.87	44.38	3.51
Waitrose	1356	1112	13625	15.15	11.93	-3.22
Rustington						
Co-op	1400	1148	6909	7.93	3.66	-4.27
Iceland	311	286	6200	1.77	5	3.23
Sainsbury New Road	3307	2811	11153	31.35	33.35	2.00
Asda Ferring	6336	2800	17493	48.98	23.92	-25.06
Bognor Regis						
Iceland	630	588	6200	3.65	2.54	-1.11
Lidl	736	572	3099	1.77	2.87	1.10
Morrisons	1745	1483	12849	19.06	16.74	-2.32
Sainsbury	5202	3360	11153	37.47	25.04	-12.43
Tesco	4058	2841	14386	40.87	37.89	-2.98

Source: Table 12 of Arun District Retail Study 2013

Table 8: Convenience trade diversion to proposal at 2015 and 2018

Stores	Zone 7			Zone 9			Zone 10			Zone 11			Zone 12			Zone 13			Zone 14			Zone 15			Total	
	4% Trade Draw			2% Trade Draw			10% Trade Draw			7% Trade Draw			7% Trade Draw			30% Trade Draw			30% Trade Draw			10% Trade Draw				
	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	2015	2018
Co-op, Arundel	0.00%	0.00	0.00	0.00%	0.00	0.00	6.00%	0.05	0.05	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	2.00%	0.05	0.05	0.00%	0.00	0.00	0.11	0.11
Local Shops Arundel	0.00%	0.00	0.00	0.00%	0.00	0.00	2.00%	0.02	0.02	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.02	0.02
Co-op, Hawthorne Road, Bognor Regis	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00
Iceland, Quuensway, Bognor Regis	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00
Lidl, Peel Centre, Shripney, Bognor Regis	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00
Morrisons, Bognor Regis	4.00%	0.01	0.01	1.00%	0.00	0.00	1.00%	0.01	0.01	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.02	0.02
Local Shops Bognor Regis	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00
Sainsburys, Bognor Regis	4.00%	0.01	0.01	2.00%	0.00	0.00	1.00%	0.01	0.01	1.00%	0.01	0.01	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.03	0.03
Tesco, Shripney, Bognor Regis	1.00%	0.00	0.00	5.00%	0.01	0.01	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.01	0.01
Co-op, Wick Street, Littlehampton	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00
Lidl, Littlehampton	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00
Sainsburys, Littlehampton	4.00%	0.01	0.01	1.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	3.00%	0.08	0.08	0.00%	0.00	0.00	0.00%	0.00	0.00	0.10	0.10
Waitrose, Littlehampton	14.00%	0.05	0.05	4.00%	0.01	0.01	21.00%	0.19	0.19	0.00%	0.00	0.00	0.00%	0.00	0.00	16.00%	0.42	0.43	5.00%	0.13	0.13	3.00%	0.03	0.02	0.83	0.82
Iceland, Surrey Street, Littlehampton	0.00%	0.00	0.00	0.00%	0.00	0.00	1.00%	0.01	0.01	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.01	0.01
Tesco Express, Finistere Way, Littlehampton	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	1.00%	0.03	0.03	0.00%	0.00	0.00	0.00%	0.00	0.00	0.03	0.03
Local Shops, Littlehampton	0.00%	0.00	0.00	1.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	1.00%	0.03	0.03	0.00%	0.00	0.00	0.00%	0.00	0.00	0.03	0.03
Sainsburys, New Road, Rustington	0.00%	0.00	0.00	0.00%	0.00	0.00	11.00%	0.10	0.10	3.00%	0.02	0.02	45.00%	0.28	0.17	17.00%	0.45	0.45	49.00%	1.30	1.30	65.00%	0.57	0.51	2.72	2.55
Tesco, Broadpiece, Littlehampton	57.00%	0.20	0.20	18.00%	0.03	0.03	35.00%	0.31	0.31	0.00%	0.00	0.00	1.00%	0.01	0.00	44.00%	1.17	1.17	9.00%	0.24	0.24	9.00%	0.08	0.07	2.03	2.03
Co-op, Broadmark Lane Rustington	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	2.00%	0.01	0.01	0.00%	0.00	0.00	6.00%	0.16	0.16	3.00%	0.03	0.02	0.20	0.19
Iceland, Churchill Parade, Rustington	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	1.00%	0.01	0.00	2.00%	0.05	0.05	4.00%	0.11	0.11	2.00%	0.02	0.02	0.18	0.18
Tesco Express, Sterling Parade, The Street, Rustington	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	3.00%	0.08	0.08	0.00%	0.00	0.00	0.08	0.08
Local Shops, Rustington	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	2.00%	0.05	0.05	3.00%	0.08	0.08	1.00%	0.01	0.01	0.14	0.14
Co-op, Ferring Street, Ferring	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	6.00%	0.04	0.02	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.04	0.02
Local Shops Ferring	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	2.00%	0.01	0.01	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.01	0.01
Asda, Ferring, West Worthing	1.00%	0.00	0.00	5.00%	0.01	0.01	3.00%	0.03	0.03	16.00%	0.10	0.10	9.00%	0.06	0.03	13.00%	0.34	0.35	15.00%	0.40	0.40	6.00%	0.05	0.05	0.99	0.96
Co-op, The Square, Angmering	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	3.00%	0.03	0.02	0.03	0.02
Marks and Spencer, BP, Worthing Road, Rustington	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	1.00%	0.01	0.01	0.01	0.01
One Stop, North Lane, Littlehampton	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00	0.00
Local Shops Angmering	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	1.00%	0.01	0.01	0.01	0.01
Marks and Spencer, Chichester	1.00%	0.00	0.00	6.00%	0.01	0.01	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%	0.00	0.00	1.00%	0.03	0.03	0.00%	0.00	0.00	0.04	0.04
Waitrose Chichester	1.00%	0.00	0.00	23.00%	0.04	0.04	8.00%	0.07	0.07	0.00%	0.00	0.00	0.00%	0.00	0.00	0.00%										

Table 9: Comparison trade diversion to proposal at 2015 and 2018

Stores	Zone 7			Zone 9			Zone 10			Zone 11			Zone 12			Zone 13			Zone 14			Zone 15			Total	Total
	4% Trade Draw			2% Trade Draw			10% Trade Draw			7% Trade Draw			7% Trade Draw			30% Trade Draw			30% Trade Draw			10% Trade Draw			2015	2018
	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	%	£m 2015	£m 2018	2015	2018
Arundel	0%	0.00	0.00	1%	0.00	0.00	4%	0.02	0.02	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.02	0.00
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Bognor Regis Town Centre	7%	0.02	0.02	6%	0.01	0.01	3%	0.02	0.02	0%	0.00	0.00	0%	0.00	0.00	3%	0.05	0.05	1%	0.02	0.02	1%	0.01	0.01	0.10	0.05
Bognor Regis Other	19%	0.04	0.05	15%	0.02	0.02	3%	0.02	0.02	0%	0.00	0.00	0%	0.00	0.00	7%	0.11	0.12	2%	0.03	0.04	2%	0.01	0.01	0.09	0.04
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Littlehampton Town Centre	6%	0.01	0.01	2%	0.00	0.00	5%	0.03	0.03	0%	0.00	0.00	2%	0.01	0.01	12%	0.20	0.22	4%	0.07	0.08	3%	0.01	0.02	0.21	0.10
Littlehampton Other	21%	0.05	0.05	7%	0.01	0.01	26%	0.15	0.16	2%	0.01	0.01	7%	0.03	0.03	40%	0.70	0.74	30%	0.53	0.56	16%	0.09	0.10	0.57	0.28
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Rustington	0%	0.00	0.00	0%	0.00	0.00	1%	0.01	0.01	0%	0.00	0.00	5%	0.02	0.02	2%	0.04	0.04	11%	0.20	0.21	8%	0.05	0.05	0.04	0.02
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Ferring	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	1%	0.00	0.00	2%	0.01	0.01	0%	0.00	0.00	1%	0.02	0.02	0%	0.00	0.00	0.00	0.00
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Arun Elsewhere	1%	0.00	0.00	2%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	3%	0.01	0.01	0%	0.01	0.01	0%	0.00	0.00	1%	0.01	0.01	0.00	0.00
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Chichester City Centre	25%	0.06	0.06	35%	0.04	0.04	26%	0.15	0.16	1%	0.00	0.00	5%	0.02	0.02	6%	0.10	0.11	6%	0.11	0.11	8%	0.05	0.05	0.20	0.10
Chichester Other	12%	0.03	0.03	25%	0.03	0.03	21%	0.12	0.13	1%	0.01	0.01	0%	0.00	0.00	5%	0.09	0.10	1%	0.02	0.02	3%	0.02	0.02	0.07	0.04
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Worthing Town Centre	2%	0.00	0.01	1%	0.00	0.00	4%	0.03	0.03	35%	0.14	0.15	36%	0.15	0.16	16%	0.27	0.29	18%	0.31	0.33	22%	0.13	0.14	0.56	0.28
Worthing Other	1%	0.00	0.00	0%	0.00	0.00	2%	0.01	0.01	46%	0.19	0.20	28%	0.11	0.12	4%	0.07	0.07	14%	0.25	0.27	26%	0.15	0.16	0.05	0.03
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Holmbush/Shoreham	0%	0.00	0.00	1%	0.00	0.00	0%	0.00	0.00	2%	0.01	0.01	1%	0.00	0.00	0%	0.01	0.01	1%	0.01	0.01	2%	0.01	0.01	0.01	0.00
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Brighton	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	4%	0.01	0.02	3%	0.01	0.01	1%	0.02	0.02	2%	0.03	0.03	3%	0.02	0.02	0.05	0.02
Portsmouth	2%	0.00	0.00	0%	0.00	0.00	1%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	1%	0.01	0.01	0%	0.01	0.01	0%	0.00	0.00	0.02	0.01
Elsewhere	5%	0.01	0.01	4%	0.00	0.00	4%	0.02	0.02	6%	0.03	0.03	7%	0.03	0.03	4%	0.07	0.08	8%	0.13	0.14	6%	0.03	0.04	0.04	0.02
	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Internet/Mail Order	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0%	0.00	0.00	0.00	0.00
Total	100%	0.23	0.25	100%	0.12	0.12	100%	0.58	0.62	100%	0.41	0.44	100%	0.41	0.44	100%	1.75	1.86	100%	1.75	1.86	100%	0.58	0.62	2.03	1.00

Table 10a: Convenience Impact at 2015

Stores	2015 Turnover Before Proposal	Total Trade Diversion	2015 Turnover After Proposal	Impact
	£m	£m	£m	%
Co-op, Arundel	4.08	0.11	3.98	2.60%
Local Shops Arundel	1.15	0.02	1.13	1.54%
Co-op, Hawthorne Road, Bognor Regis	0.03	0.00	0.03	0.00%
Iceland, Queensway, Bognor Regis	0.06	0.00	0.06	0.00%
Lidl, Peel Centre, Shripney, Bognor Regis	0.13	0.00	0.13	0.00%
Morrisons, Bognor Regis	0.75	0.02	0.73	3.28%
Local Shops Bognor Regis	0.53	0.00	0.53	0.00%
Sainsburys, Bognor Regis	2.27	0.03	2.23	1.44%
Tesco, Shripney, Bognor Regis	0.59	0.01	0.58	2.09%
Co-op, Wick Street, Littlehampton	1.36	0.00	1.36	0.00%
Lidl, Littlehampton	0.66	0.00	0.66	0.00%
Sainsburys, Littlehampton	3.76	0.10	3.66	2.54%
Waitrose, Littlehampton	10.33	0.83	9.50	7.99%
Iceland, Surrey Street, Littlehampton	0.80	0.01	0.80	1.10%
Tesco Express, Finistere Way, Littlehampton	1.59	0.03	1.56	1.67%
Local Shops, Littlehampton	0.49	0.03	0.46	5.78%
Sainsburys, New Road, Rustington	33.18	2.72	30.46	8.19%
Tesco, Broadpiece, Littlehampton	35.13	2.03	33.09	5.79%
Co-op, Broadmark Lane Rustington	3.73	0.20	3.53	5.31%
Iceland, Churchill Parade, Rustington	5.09	0.18	4.91	3.59%
Tesco Express, Sterling Parade, The Street, Rustington	1.41	0.08	1.33	5.66%
Local Shops, Rustington	2.09	0.14	1.95	6.77%
Co-op, Ferring Street, Ferring	1.10	0.04	1.06	3.37%
Local Shops Ferring	0.41	0.01	0.39	3.03%
Asda, Ferring, West Worthing	21.97	0.99	20.98	4.50%
Co-op, The Square, Angmering	0.75	0.03	0.73	3.52%
Marks and Spencer, BP, Worthing Road, Rustington	0.08	0.01	0.07	10.85%
One Stop, North Lane, Littlehampton	0.22	0.00	0.22	0.00%
Local Shops Angmering	0.34	0.01	0.33	2.63%
Marks and Spencer, Chichester	0.42	0.04	0.38	9.73%
Waitrose Chichester	1.14	0.11	1.03	10.07%
Lidl, Portfield Way, Chichester	0.06	0.00	0.06	0.00%
Local Shops Chichester	0.22	0.00	0.22	0.00%
Sainsburys Chichester	4.14	0.14	4.00	3.39%
Tesco, Fishbourne Road, Chichester	0.33	0.01	0.31	3.80%
Co-op, Goring, Worthing	8.61	0.05	8.56	0.52%
Iceland, Goring Road, Worthing	3.45	0.01	3.44	0.18%
Waitrose, High Street, Worthing	8.55	0.13	8.42	1.51%
Co-op, Manor Parade, Salvington Road, Worthing	0.60	0.00	0.60	0.00%
Lidl, North Street Worthing	1.11	0.00	1.11	0.00%
Marks and Spencer, Montague Street, Worthing	1.83	0.06	1.77	3.14%
Morrisons, Newland Street, Worthing	6.81	0.04	6.77	0.54%
Tesco Express, Findon Road, Worthing	1.01	0.00	1.01	0.00%
Tesco Express, Rectory Road, Salvington, Worthing	0.53	0.00	0.53	0.00%
Local Shops, Worthing	3.25	0.01	3.25	0.19%
Sainsburys, Lyons Farm, Worthing	14.87	0.11	14.75	0.77%
Tesco, West Durrington, Worthing	58.86	0.48	58.38	0.82%
Aldi, Carlton Terrace, Portslade Brighton	0.07	0.00	0.07	0.00%
Co-op, Barnham	0.57	0.01	0.56	1.55%
The Trading Post, Barnham	0.17	0.00	0.17	1.02%
Asda, Speedfields, Newgate Lane, Fareham	0.05	0.00	0.05	0.00%
Co-op, Fareham Road, Wickham, Fareham	0.07	0.00	0.07	0.00%
Co-op, Main Road, Yapton	1.19	0.01	1.18	1.18%
Co-op, The Boulevard, Nelson Road, Durrington	0.53	0.00	0.53	0.00%
Tesco Express, Goring Way, Goring-by-Sea	1.71	0.00	1.71	0.00%
Tesco Express, Littlehampton Road, Durrington	1.05	0.00	1.05	0.00%
Tesco Metro, London Road, Pulborough	0.10	0.00	0.10	0.00%
Waitrose, Between Streets, Cobham, Surrey	0.53	0.00	0.53	0.00%
Waitrose, West Street, East Grinstead	0.19	0.00	0.19	0.00%
Local Shops Barnham	0.09	0.00	0.09	1.93%
Local Shops East Preston	0.67	0.00	0.67	0.00%
Local Shops, Findon	0.34	0.00	0.34	0.00%
Local Shops, Goring-by-Sea	1.47	0.00	1.47	0.00%
Local Shops, Sharpethorne	0.43	0.00	0.43	0.00%
Local Shops, Slindon	0.15	0.00	0.15	1.16%
Local Shops, Tarring	1.64	0.00	1.64	0.00%
Local Shops, Walberton	0.40	0.01	0.39	1.33%
Local Shops, Yapton	0.43	0.00	0.42	0.82%
Spar, Goring Road, Goring-by-Sea	0.53	0.00	0.53	0.00%
Internet/Online	8.82	0.00	8.82	0.00%

Table 10b: Convenience Impact at 2018

Stores	2018 Turnover Before Proposal	Total Trade Diversion	2018 Turnover After Proposal	Impact
	£m	£m	£m	%
Co-op, Arundel	4.26	0.11	4.16	2.49%
Local Shops Arundel	1.20	0.02	1.18	1.48%
Co-op, Hawthorne Road, Bognor Regis	0.03	0.00	0.03	0.00%
Iceland, Queensway, Bognor Regis	0.06	0.00	0.06	0.00%
Lidl, Peel Centre, Shripney, Bognor Regis	0.14	0.00	0.14	0.00%
Morrisons, Bognor Regis	0.79	0.02	0.76	3.15%
Local Shops Bognor Regis	0.55	0.00	0.55	0.00%
Sainsburys, Bognor Regis	2.36	0.03	2.33	1.39%
Tesco, Shripney, Bognor Regis	0.62	0.01	0.60	2.01%
Co-op, Wick Street, Littlehampton	1.42	0.00	1.42	0.00%
Lidl, Littlehampton	0.69	0.00	0.69	0.00%
Sainsburys, Littlehampton	3.92	0.10	3.83	2.44%
Waitrose, Littlehampton	10.78	0.82	9.96	7.65%
Iceland, Surrey Street, Littlehampton	0.84	0.01	0.83	1.06%
Tesco Express, Finistere Way, Littlehampton	1.66	0.03	1.63	1.60%
Local Shops, Littlehampton	0.51	0.03	0.48	5.56%
Sainsburys, New Road, Rustington	34.64	2.55	32.09	7.37%
Tesco, Broadpiece, Littlehampton	36.67	2.03	34.65	5.53%
Co-op, Broadmark Lane Rustington	3.89	0.19	3.70	4.90%
Iceland, Churchill Parade, Rustington	5.32	0.18	5.14	3.37%
Tesco Express, Sterling Parade, The Street, Rustington	1.47	0.08	1.39	5.44%
Local Shops, Rustington	2.18	0.14	2.04	6.46%
Co-op, Ferring Street, Ferring	1.15	0.02	1.13	2.00%
Local Shops Ferring	0.43	0.01	0.42	1.80%
Asda, Ferring, West Worthing	22.90	0.96	21.93	4.21%
Co-op, The Square, Angmering	0.79	0.02	0.76	2.99%
Marks and Spencer, BP, Worthing Road, Rustington	0.09	0.01	0.08	9.21%
One Stop, North Lane, Littlehampton	0.23	0.00	0.23	0.00%
Local Shops Angmering	0.35	0.01	0.34	2.23%
Marks and Spencer, Chichester	0.44	0.04	0.40	9.35%
Waitrose Chichester	1.19	0.12	1.08	9.67%
Lidl, Portfield Way, Chichester	0.06	0.00	0.06	0.00%
Local Shops Chichester	0.23	0.00	0.23	0.00%
Sainsburys Chichester	4.33	0.14	4.19	3.20%
Tesco, Fishbourne Road, Chichester	0.34	0.01	0.33	3.65%
Co-op, Goring, Worthing	8.95	0.05	8.90	0.50%
Iceland, Goring Road, Worthing	3.58	0.01	3.58	0.17%
Waitrose, High Street, Worthing	8.90	0.11	8.79	1.19%
Co-op, Manor Parade, Salvington Road, Worthing	0.62	0.00	0.62	0.00%
Lidl, North Street Worthing	1.16	0.00	1.16	0.00%
Marks and Spencer, Montague Street, Worthing	1.90	0.05	1.85	2.65%
Morrisons, Newland Street, Worthing	7.08	0.04	7.04	0.52%
Tesco Express, Findon Road, Worthing	1.05	0.00	1.05	0.00%
Tesco Express, Rectory Road, Salvington, Worthing	0.55	0.00	0.55	0.00%
Local Shops, Worthing	3.38	0.01	3.38	0.18%
Sainsburys, Lyons Farm, Worthing	15.46	0.10	15.36	0.65%
Tesco, West Durrington, Worthing	61.21	0.44	60.76	0.72%
Aldi, Carlton Terrace, Portslade Brighton	0.07	0.00	0.07	0.00%
Co-op, Barnham	0.60	0.01	0.59	1.49%
The Trading Post, Barnham	0.18	0.00	0.18	0.98%
Asda, Speedfields, Newgate Lane, Fareham	0.05	0.00	0.05	0.00%
Co-op, Fareham Road, Wickham, Fareham	0.07	0.00	0.07	0.00%
Co-op, Main Road, Yapton	1.24	0.01	1.23	1.14%
Co-op, The Boulevard, Nelson Road, Durrington	0.55	0.00	0.55	0.00%
Tesco Express, Goring Way, Goring-by-Sea	1.78	0.00	1.78	0.00%
Tesco Express, Littlehampton Road, Durrington	1.10	0.00	1.10	0.00%
Tesco Metro, London Road, Pulborough	0.11	0.00	0.11	0.00%
Waitrose, Between Streets, Cobham, Surrey	0.55	0.00	0.55	0.00%
Waitrose, West Street, East Grinstead	0.20	0.00	0.20	0.00%
Local Shops Barnham	0.10	0.00	0.09	1.85%
Local Shops East Preston	0.70	0.00	0.70	0.00%
Local Shops, Findon	0.35	0.00	0.35	0.00%
Local Shops, Goring-by-Sea	1.53	0.00	1.53	0.00%
Local Shops, Sharpethorne	0.45	0.00	0.45	0.00%
Local Shops, Slindon	0.16	0.00	0.16	1.11%
Local Shops, Tarring	1.71	0.00	1.71	0.00%
Local Shops, Walberton	0.41	0.01	0.41	1.28%
Local Shops, Yapton	0.45	0.00	0.44	0.79%
Spar, Goring Road, Goring-by-Sea	0.55	0.00	0.55	0.00%
Internet/Online	9.19	0.00	9.19	0.00%

Table 11a: Comparison Impact at 2015

Stores	2015 Turnover Before Proposal	Total Trade Diversion	2015 Turnover After Proposal	Impact
	£m	£m	£m	%
Arundel	2.15	0.02	2.13	1.15%
Bognor Regis Town Centre	7.83	0.10	7.73	1.30%
Bognor Regis Other	4.16	0.09	4.08	2.11%
Littlehampton Town Centre	21.02	0.21	20.81	0.99%
Littlehampton Other	18.97	0.57	18.40	3.01%
Rustington	16.89	0.04	16.85	0.22%
Ferring	6.19	0.00	6.19	0.00%
Arun Elsewhere	0.49	0.00	0.49	0.68%
Chichester City Centre	34.29	0.20	34.09	0.59%
Chichester Other	5.65	0.07	5.58	1.27%
Worthing Town Centre	145.51	0.56	144.95	0.38%
Worthing Other	38.76	0.05	38.71	0.14%
Holmbush/Shoreham	7.52	0.01	7.51	0.09%
Brighton	14.41	0.05	14.36	0.33%
Portsmouth	2.90	0.02	2.88	0.66%
Elsewhere	17.12	0.04	17.08	0.21%
Internet/Mail Order	83.58	0.00	83.58	0.00%
Total		2.03		

Table 11b: Comparison Impact at 2018

Stores	2018 Turnover Before Proposal	Total Trade Diversion	2018 Turnover After Proposal	Impact
	£m	£m	£m	%
Arundel	2.37	0.00	2.37	0.00%
Bognor Regis Town Centre	8.63	0.05	8.57	0.59%
Bognor Regis Other	4.59	0.04	4.54	0.95%
Littlehampton Town Centre	23.15	0.10	23.05	0.45%
Littlehampton Other	20.89	0.28	20.61	1.36%
Rustington	18.60	0.02	18.58	0.10%
Ferring	6.80	0.00	6.80	0.00%
Arun Elsewhere	0.54	0.00	0.54	0.31%
Chichester City Centre	37.76	0.10	37.66	0.27%
Chichester Other	6.22	0.04	6.18	0.57%
Worthing Town Centre	159.75	0.28	159.47	0.17%
Worthing Other	42.52	0.03	42.49	0.06%
Holmbush/Shoreham	8.25	0.00	8.25	0.04%
Brighton	15.82	0.02	15.79	0.15%
Portsmouth	3.19	0.01	3.18	0.30%
Elsewhere	18.81	0.02	18.79	0.10%
Internet/Mail Order	91.89	0.00	91.89	0.00%
Total		1.00		

Table 12: Summary of Combined Impact on Study Area Centres at 2015 and 2018

2015	Trade Diversion (£million)			Survey Derived Turnover before Trade Diversion			Total Combined	DPDS Devised Turnover Before Trade Diversion			Total Combined
Stores	Convenience	Comparison	Total	Convenience	Comparison	Total	%	Convenience	Comparison	Total	%
Bognor Regis	0.02	0.10	0.13	1.50	7.83	9.34	1.36%	24.93	61.83	86.76	0.15%
Littlehampton Town Centre	0.98	0.21	1.19	18.99	21.02	40.01	2.98%	21.92	23.25	45.17	2.64%
Rustington	0.60	0.04	0.64	12.31	16.89	29.20	2.19%	12.31	20.84	33.15	1.93%
Total	1.61	0.35	1.96	32.81	45.74	78.55		59.16	105.93	165.08	

2018	Trade Diversion (£million)			Survey Derived Turnover before Trade Diversion			Total Combined	DPDS Devised Turnover Before Trade Diversion			Total Combined
Stores	Convenience	Comparison	Total	Convenience	Comparison	Total	%	Convenience	Comparison	Total	%
Bognor Regis	0.02	0.05	0.08	1.57	8.63	10.19	0.74%	26.03	68.11	94.14	0.08%
Littlehampton Town Centre	0.98	0.10	1.09	19.83	23.15	42.98	2.53%	22.88	25.62	48.50	2.24%
Rustington	0.59	0.02	0.61	12.86	18.60	31.45	1.94%	12.86	22.96	35.82	1.70%
Total	1.60	0.17	1.77	34.25	50.38	84.63		61.78	116.68	178.46	

Table 12b: Summary of Combined Impact on Study Area Centres at 2015 and 2018 (Convenience Floorspace Only)

2015	Trade Diversion (£million)			Survey Derived Turnover before Trade Diversion			Total Combined	DPDS Devised Turnover Before Trade Diversion			Total Combined
Stores	Convenience	Comparison	Total	Convenience	Comparison	Total	%	Convenience	Comparison	Total	%
Bognor Regis	0.02	0.00	0.02	1.50	7.83	9.34	0.26%	24.93	61.83	86.76	0.03%
Littlehampton Town Centre	0.98	0.00	0.98	18.99	21.02	40.01	2.46%	21.92	23.25	45.17	2.18%
Rustington	0.60	0.00	0.60	12.31	16.89	29.20	2.06%	12.31	20.84	33.15	1.81%
Total	1.61	0.00	1.61	32.81	45.74	78.55		59.16	105.93	165.08	

2018	Trade Diversion (£million)			Survey Derived Turnover before Trade Diversion			Total Combined	DPDS Devised Turnover Before Trade Diversion			Total Combined
Stores	Convenience	Comparison	Total	Convenience	Comparison	Total	%	Convenience	Comparison	Total	%
Bognor Regis	0.02	0.00	0.02	1.57	8.63	10.19	0.24%	26.03	68.11	94.14	0.03%
Littlehampton Town Centre	0.98	0.00	0.98	19.83	23.15	42.98	2.29%	22.88	25.62	48.50	2.03%
Rustington	0.59	0.00	0.59	12.86	18.60	31.45	1.88%	12.86	22.96	35.82	1.65%
Total	1.60	0.00	1.60	34.25	50.38	84.63		61.78	116.68	178.46	

Table 13: Commitments

Application Reference	Description		DPDS Assessment of Turnover Convenience	DPDS Assessment of Turnover Comparison	Convenience diversion	Comparison diversion
			£m	£m		
R/59/12	Sainsbury's Redevelopment*		8.25	15.89	Littlehampton £0.87 m Wick £0.12m Arundel £0.02m Rustington £0.66m	Littlehampton £1.78m Rustington £0.3m
LU/517/04	Littlehampton Covered Market		0	1.35	0	Rustington £0.1
LU/271/11	Morrisons	1980 sq m net convenience and 348 sq metres comparison	25.44	2.94	Littlehampton £2.2m Wick £0.38m Arundel £0.1m Rustington £1.3m	Littlehampton £0.1m Rustington £1.9m
BE/75/12	Bognor Regis Retail Park		0	3.04	0	Bognor Regis £3.0m Littlehampton £0.1m
			Total Commitments Littlehampton		3.07	0.63
			Total Commitments Rustington		1.96	2.3
			Total Commitments Bognor Regis		/	3

Notes:

DPDS Assessment of Turnover of Sainsbury's Commitment Revised to reflect audit in respect of R/59/12

Cumulative assessment does not include R/210/11 on the basis that this would be revoked if planning permission is granted

Table 14: Cumulative Impact -Summary of Combined Impact on Study Area Centres at 2015 and 2018

2015	Trade Diversion (£million)					Total + commitments	Survey Derived Turnover before Trade Diversion (£million)			Total Combined %
Stores	Convenience	commitments	Comparison	commitments	Total		Convenience	Comparison	Total	
Bognor Regis	0.02	0.00	0.10	3.00	0.13	3.13	24.93	61.83	86.76	0.15%
Littlehampton Town Centre	0.98	2.30	0.21	0.47	1.19	3.96	21.92	23.25	45.17	8.77%
Rustington	0.60	1.47	0.04	1.73	0.64	3.84	12.31	20.84	33.15	11.58%
Total	1.61	3.77	0.35	5.20	1.96	10.93	59.16	105.93	165.08	

2018	Trade Diversion (£million)					Total + commitments	Survey Derived Turnover before Trade Diversion (£million)			Total Combined %
Stores	Convenience	commitments	Comparison	commitments	Total		Convenience	Comparison	Total	
Bognor Regis	0.02	0.00	0.05	3.00	0.08	3.08	26.03	68.11	94.14	0.08%
Littlehampton Town Centre	0.98	2.30	0.10	0.50	1.09	3.89	22.88	25.62	48.50	8.02%
Rustington	0.59	1.47	0.02	1.84	0.61	3.92	12.86	22.96	35.82	10.94%
Total	0.74	1.47	0.07	4.84	0.81	7.12	38.89	91.07	129.96	

Cgms
www.cgms.co.uk

From: Simon Davis <Simon.Davis@arun.gov.uk>
Sent: Wednesday 25 September 2024 14:38
To: Chris Barker [REDACTED]
Cc: Megan Smith [REDACTED]
Subject: RE: PAA/98/23 Land West of New Courtwick Lane, Wick.

Dear Chris,

Thanks for your email.

I have spoken with our ecologist, and we are both of the same view that the BNG can be considered separately per site area/application part through the hybrid application. We are not aware of any formal guidance or case law on the question, but we don't why this would not be the correct way to deal with this. Furthermore, we will always separate out the conditions on a decision for the full and outline aspects. This is the approach I recently took on the application by Landlink for west of Bilsham, Road (Y/3/22/OUT). However, in that case there was only one s106 agreement which covered both parts of the hybrid. I am not aware of there being multiple s106's for a single application, hybrid or otherwise.

In addition to those sites mentioned in our pre-application response, you should also look at the Bodyshop site in Littlehampton which is presently being marketed.

EIA Screening Requests are made public and advertised on our website. Our internal target for responding to these is 3 weeks from validation date.

Kind Regards

Simon

Simon J Davis MRTPI
Principal Planning Officer, Directorate of Growth
T: 01903 737874
E: simon.davis@arun.gov.uk
Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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



Our priorities...				
 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 