

**PLANNING APPLICATION
ON BEHALF OF
STORE PROPERTY INVESTMENTS LTD**

**RENEWAL OF
PLANNING PERMISSION R/72/08 AT**

**RUSTINGTON RETAIL PARK
PLANNING AND RETAIL STATEMENT**

SEPTEMBER 2011

PREPARED AT THE OFFICES OF

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CHARTERED SURVEYORS • COMMERCIAL PROPERTY CONSULTANTS • CHARTERED TOWN PLANNERS

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1. Introduction

- 1.1 This statement has been prepared on behalf of Store Property Investments Limited, in respect of a planning application at Rustington Retail Park (RRP) for the renewal of a planning permission (R/72/08 – **Appendix 1**) 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), alterations to car park & associated landscaping alterations."

- 1.2 The application was granted planning consent (**Appendix 1**) on 3rd October 2008 and Condition 1 attached to it read:

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

- 1.2 Consequently the extant planning application expires on the 3rd October 2011 and this application seeks to renew the permission for an additional three years.

- 1.5 This statement provides greater detail and justification for the proposals in the following sections:

- Section 2: Site and Surrounding Area;
- Section 3: Planning History;
- Section 4: Planning Policy;
- Section 5: Retail Matters
- Section 6: Conclusions.

2. Site and Surrounding Area

- 2.1 The planning application site, Focus retail unit, is located in the Rustington Retail Park (RRP) and forms part of a wider retail offer. It is currently vacant, but, was previously occupied by Focus DIY. Other retailers on the park are Halfords and Pets at Home.
- 2.2 The site is located approximately 850m from the eastern edge of Rustington Town Centre. The retail park is accessed via the A259 Rustington Bypass to the north.
- 2.3 The application building is a single retail warehouse A1 unit comprising 3,252sqm and a garden centre of 410sqm to the rear. The unit is serviced via a dedicated service yard located between the unit and the Halfords to the east. The RRP is served by 300 car parking spaces.
- 2.4 The surrounding area is characterised by commercial and residential property. The site is not within a flood zone.

3. Planning History

3.1 The RRP was developed in two principal phases" 1. Focus DIY units; and 2. Halfords and Pets at Home.

3.2 The most relevant planning consents relating to the Focus DIY unit are:

- i. R/194/87, 10th August 1987 – 35,000sqft of ground floor non-food retail warehouse space plus 1,100sqft of ancillary offices on first floor with associated vehicle parking to County Planning standards, site roads and alterations to existing highways. Condition 4 states that *"The proposed building shall be used for a non food retail warehouse and for no other purpose"*.
- ii. R/156/93, 1st November 1993 – Non-compliance with Condition No 5 imposed on planning permission R/194/87 for new external sales area, and provision of extra car parking.
- iii. R/135/95, 30th November 1994 – Formation of new external compound as garden centre.
- iv. R/72/08, 3rd October 2008 – 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), alterations to car park and associated landscaping alterations (this has not been implemented).
- v. R103/10, 18th August 2010 – External alterations, reconfiguration of car parking, pedestrian and cycle access to provide refurbished retail unit.
- vi. R105/10, 18th August 2010 – Erection of mezzanine floor;
- vii. R/10/11, 15th July 2011 – Variation of condition 4 attached to planning application Ref: R/194/87 to allow for the sale of food within the Focus retail unit, Rustington Retail Park; alterations to the external elevations; and a new mezzanine comprising an additional 465sqm retail floorspace.

3.3 In respect of the Halfords and Pets at Home, the following consents are relevant:

- i. R/272/87, 16th December 1987 – Outline application for 18,000sqft of non-food retail warehouse space and associated car parking.

- ii. R/216/88, Details in pursuance of R/272/87 for 18,000sqft approximately non-food retail warehouse space: details of design and external appearance of the building.
- iii. R/171/94, Details in pursuance of R/272/87 for non-food retail warehouse space, altered elevations and floor plan layout (previously approved and partly implemented under consent R/216/88).

4. Planning Policy

- 4.1 The planning policy context for the application is set by national guidance, the Arun District Local Plan (ADLP) and supplementary planning guidance (SPG) notes.
- 4.2 On 25th July 2011, the Government published the draft National Planning Policy Framework for consultation. The draft Framework reduces the 1,300 pages of existing national planning policy guidance to just 52 pages and is a key element of the Government's commitment to make the planning system less complex and more accessible, and to promote sustainable growth.
- 4.3 The draft contains a strong presumption in favour of sustainable development. It is described as "the golden thread" that runs through both plan making and decision taking. Paragraph 13 of the draft states:

"The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. A positive planning system is essential because, without growth, a sustainable future cannot be achieved. Planning must operate to encourage growth and not act as an impediment. Therefore significant weight should be placed on the need to support economic growth through the planning system."

- 4.4 The draft encourages local planning authorities to prepare local plans to reflect the advice contained in the Framework, as well as approve proposals that accord with statutory plans without delay. It also encourages local planning authorities to grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.
- 4.5 Under the aegis of 'Planning for Prosperity' the draft Framework continues to promote the vitality and viability of town centres and the application of the 'sequential approach' to planning applications for retail and leisure uses that are not in an existing centre and not in accordance with an up-to date Local Plan. Draft Paragraph 78 states:

"Local planning authorities should prefer applications for retail and leisure uses to be located in town centres where practical, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. In applying this sequential

approach, local planning authorities should ensure that potential sites are assessed for their availability, suitability and viability and for their ability to meet the full extent of assessed quantitative and qualitative needs."

- 4.6 In keeping with prevailing advice, when assessing applications for retail and leisure development outside of town centres, which are not in accordance with an up to date Local Plan, local planning authorities should require an impact assessment. The requirement should be defined by a locally-set floorspace threshold and, if one is not in place the default threshold is 2,500 sq m.
- 4.7 The draft requires both planning policies and development management decisions to assess the impact of retail and leisure proposals, including 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 ten years from the time the application is made.
- 4.8 The intention is that the document will provide the basic framework for future plan making and development management but it will be the responsibility of the local community and local authorities to determine the details of development within their own areas. Although only in draft at present, the Framework is a material consideration in the determination of any planning application, although the weight the Council should afford to its provisions will be limited until it is formally adopted as National Planning Policy Guidance.
- 4.9 Planning Policy Statement (PPS) 1: Delivering Sustainable Development promotes the efficient use of land through mixed use development on previously developed sites. It encourages development that makes the fullest use of public transport in strategic locations.
- 4.10 PPS 4: Planning for Sustainable Economic Growth sets out the Government's objectives for economic development. It sets out a series of "development management policies" against which applications for planning permission should be assessed. Policy EC10: "determining planning applications for economic development" states that "planning applications that secure sustainable economic growth should be treated favourably". For main town centre uses (such as retail and leisure) policy EC14 is relevant. This requires supporting information on the

sequential assessment and likely impacts for proposals which create additional floorspace or vary conditions.

- 4.11 Policy EC15 sets out the requirements of sequential assessments. Sites under consideration must be assessed for their availability, suitability and viability, and it must be demonstrated that all in centre and edge of centre options have been thoroughly assessed before out of centre options are considered. Developers are required to show flexibility in terms of the scale and layout of their development, its car parking provision and the scope for disaggregating parts of the development to more central sites. Local Authorities are required to take into consideration any "genuine difficulties" the applicant can demonstrate would occur in operating the proposal for a sequentially preferable site.
- 4.12 Policy EC16 sets out the requirements of the impact test. Under this test, proposed development must be assessed for its impact on investment in a centre and allocated sites; upon town centre vitality and viability; in centre trade/turnover and any defined "locally important impacts". In addition, applicants are required to demonstrate that there is capacity for the proposal in terms of current and future consumer expenditure.
- 4.13 Policy EC17 sets out how Local Authorities should determine applications, based on the two tests set out in EC15 and EC16. Applications which fail either the sequential or impact tests should be refused.
- 4.14 The Arun District Local Plan was adopted in 2003 and with applicable policies 'saved' by the Secretary of State in September 2007.
- 4.15 Policy GEN2 deals with the built-up area boundary and states that development or redevelopment will be permitted within the built-up area boundaries, subject to the other policies in this plan. Outside the built-up area boundaries, development or redevelopment will not be permitted unless it is consistent with other Local Plan policies.
- 4.16 Policy GEN7 deals with the form of new development and requires schemes to have high quality design and layouts. It requires new development to not have an unacceptable impact on adjoining occupiers.

4.17 Policy DEV26 deals with new retail development and states that the District Council will seek to maintain the existing hierarchy of retail centres within Arun and retail development which accords with this objective will be permitted provided that:

- (i) it is of a high standard of design, materials and layout, and has due regard to the character of the site and its surroundings;
- (ii) 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.

4.18 Policy DEV27 states that for out-of-centre retail Proposals outside the Principal Shopping Areas, as defined on the Proposals Map, for non-food retail and food retail, including extensions, will be permitted provided that:

- (i) the proposal does not adversely affect the vitality and viability of the Principal Shopping Areas and local shopping areas, either as an individual development or cumulatively with similar existing or proposed developments;
- (ii) it is easily accessible by the highway network and 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.

4.19 It goes onto state that on out of centre sites will need to demonstrate that no suitable sites can be found, firstly within the existing town centre or, secondly, on the edge of the centre.

5. Retail Matters

Current Scenario

- 5.1 The application unit is currently vacant following the previous tenant Focus DIY, going into administration in May 2011. The unit was continued to be used for 'Stock Clearance' by the creditors and was finally vacated in June 2011.
- 5.2 Since being vacated the unit has been actively marketed for retail use including garden centre, for which the marketing details are contained at **Appendix 2**. To-date there has been limited interest in the unit.
- 5.3 There are a number of qualitative issues associated with the unit that make it difficult to market to modern operators. The unit is approximately 24 years old and the age of the building is a reason why it currently lacks market appeal.
- 5.4 The size and layout of the unit does not appeal to contemporary retail operators. Generally the unit is considered too large for a single DIY operator. The layout also presents difficulties in terms of sub-division as there is only one loading bay to the east. To establish sub-division it would be necessary to introduce corridors through the unit which occupies significant areas which is an inefficient use of floorspace and make the unit unviable. Sub-division is further restricted by the low floor-to-ceiling heights which restrict retail operators preferred mezzanine development.

Previous Application

- 5.5 Planning permission R/72/08 was granted planning consent on 3rd October 2008. The application was for the demolition of the existing Focus unit (3,253sqm), relocation of an electricity sub-station, relocation and enlargement of an existing garden centre and the construction of three new retail units. The scheme also sought the reconfiguration of the car parking area including new pedestrian routes through it.

New retail	Ground Floor (gross - sqm)	Mezzanine (sqm)	Total (sqm - gross)
Unit 1	2,568	111	2,619
Unit 2	929	465	1,394
Unit 3	743	372	1,115
			5,128

- 5.6 The application was supported by a Planning, Design and Access Statement (dated February 2008) which included a Retail Impact Assessment (**Appendix 3**).
- 5.7 The Officers report (**Appendix 4**) makes reference to a review of the submission by the District Council's Retail Consultant. At page 4 of the report (**Appendix 4**) the Consultant states that the potential level of impact will be determined by the types of retailers that the proposals would attract to RRP. Consequently the District Council's Retail Consultant recommended that a goods condition should be imposed that would:

"... maintain the status quo and help ensure that the new traders have no more impact than existing trade."

- 5.8 The Officers Report (**Appendix 4**) then concludes at page 8 stating:

"Although the existing unit is restricted only to non-food its only occupier would meet the terms of "bulky goods" type store, and in this way has little impact on the existing town centres. The Retail Consultant has indicated that if the new stores were restricted to bulky goods then the impact in the town centres would be minimal, and the proposal would be in line with PPS6."

- 5.9 A planning condition (6) was subsequently attached to the [planning permission restricting the type of goods that could be sold from the units (**Appendix 1**). This was considered acceptable at the time to overcome any impact that could potentially arise from the proposals.
- 5.10 It is considered that this approach is still acceptable in this instance. However, the following section provides an update of the retail position and considers whether there have been any significant changes in retail warehousing since the 2008 consent. This is submitted on a without prejudice basis.

PPS4

- 5.11 As set out above, it is considered that the use of a goods restriction condition and the Council's previously accepted case would mean that the impact arising from the renewal of the planning permission would be negligible. In addition it is not considered that retail warehousing is considered a main town centre use.

- 5.12 However, since the issue of the November 2008 planning consent, PPS4 has been published and the 'tests' for retail planning applications have changed. Whilst the document still maintains the 'town centre first' principle, it has removed the requirement to demonstrate retail need. PPS4 requires planning applications for main town centre uses to first consider whether there are any sequentially preferable sites (Policy EC15), and if not, then to consider retail impact (Policy EC16).

Sequential Assessment

- 5.13 Policy EC15.1 sets out the provisions by which Local Planning Authorities should consider sequential assessments. In particular it requires that all sites are assessed for their availability, suitability and viability. It requires developers to demonstrate flexibility in:

- i. Scale of the development;
- ii. Format of the proposal;
- iii. Level of car parking provision;
- iv. Scope for disaggregation. The guidance also states here that Local planning authorities should not seek arbitrary sub-division of proposals.

- 5.14 In undertaking the assessment a review has been undertaken of the local plan, Arun District technical retail studies, existing commitments and discussions with local agents. All centres have been surveyed.

- 5.15 There are no development sites identified in either the Arun District Local Plan or the Coastal District Retail Study within Littlehampton Town Centre, Rustington District Centre, or the Local Centres of Ferring and Angerming.

Littlehampton Town Centre

- 5.16 In July 2004 the Littlehampton Vision Masterplan was produced which set out a framework within which investment could take place in the town and its surroundings. As part of this a number of development sites were identified that have future development potential to support the Vision.

- 5.17 In November 2009 a Development Brief was produced for *St Martin's Car Park Site* which is located within the town centre in close proximity to the High Street. The document proposes a mixed-use development that would provide a range of retail unit sizes that would accommodate a range of operators. The indicative development options include retail, residential, car parking, community and leisure, employment and a hotel.
- 5.18 Although the site may be suitable in terms of the size of units that could be provided, it is considered that the type of operator (bulky goods) would conflict with the aims of the Masterplan. This seeks to encourage comparison retailing that would compliment and support existing operators in the town centre. Retail warehousing is not considered to be a main town centre use and would therefore be unsuitable.
- 5.19 The Masterplan seeks the development of a comprehensive mixed use scheme that would incorporate a variety of users. The incremental development of part of the site for retail warehousing could undermine this 'vision' and thus make the wider Masterplan unviable.
- 5.20 The site is in multiple ownership and is therefore considered unavailable within a reasonable time period.
- 5.21 The *Clifton Road* site is a Travis Perkins builder's merchants and located 15m from the Principal Shopping Frontage. The Masterplan proposed its redevelopment for residential use with retail and food/drink (A3) uses at ground floor. The site has now been developed by Lidl as a food store and is no longer available.
- 5.22 The *Market and depository* sites are located within the town centre. The former is identified in the Vision as being suitable for mixed use development including small retail units.
- 5.23 A planning application was submitted in 2004 for the redevelopment of the market site for mixed use development, but was subsequently refused planning permission. A planning appeal was lodged in 2009 and allowed in March 2010. Permission has been granted for mixed use development comprising 477sqm retail with residential above. The size of the retail element would be unsuitable for the size of units proposed.

- 5.24 The *depository* site is 0.22ha in size and contains a number of leisure uses including a sports club. The Masterplan states that it would be suitable for mixed use development, but fails to specify what uses. Reference is made to the need to relocate existing users on-site, in particular the squash club, and it is in multiple ownership. Consequently it is considered that the site is neither suitable or available.

Rustington District Centre

- 5.25 There are no allocated development sites in the Local Plan. The applicants, Store Property Investments Ltd, are the landlords of the centre and can confirm that there are no available sites.
- 5.26 The *Churchill Parade Car Park* is located within the district centre's principal shopping area and contains approximately 150 parking spaces. The site is approximately 0.30ha in size.
- 5.27 The site is currently unavailable and serves as a central car park for the district centre. The sites long, rectangular shape and positioning in respect of existing buildings would restrict the form of development that could be achieved on the site. Servicing for units in Churchill Parade is taken from the car park further bringing into question the sites suitability.
- 5.28 The *Broadmark Parade Car Park* is within the principle shopping area and consists of 200 parking spaces with a site area of approximately 0.70ha. It serves as a car parking for the parade including the Somerfield store.
- 5.29 The car park serves the district centre and is currently unavailable. Its positioning to the rear of the parade would result in difficulties in configuring new retail development. Consequently it is considered unavailable and unsuitable.

Summary

- 5.30 The applicants, Store Property Investments Limited, have held discussions with the Local Planning Authority regarding previous applications at the RRP and it was concluded as part of those that there are no other site designations or sites coming forward that could be considered as part of this sequential assessment.
- 5.31 In reviewing potential sites that could be available it has been demonstrated that there are no suitable, available or viable sites within local centres that would be sequentially preferable for the application proposals.

Impact

- 5.32 The Retail Study that accompanied the 2008 submission, appended to this document (**Appendix 3**), was prepared under the tests set out in PPS6 and included a quantitative need assessment. Whilst this requirement has now been removed under PPS4, it is still useful to consider retail capacity when assessing the potential impact of a scheme on designated centres.
- 5.33 PPS4 clarifies the criteria against which applications for economic development will need to be assessed for their potential impact. Policy EC10 identifies the criteria relating to all new economic development and Policy EC16 identifies the criteria relating to main town centre uses which are not in centre and not in accordance with an up-to-date development plan. The following section addresses the criterion of each of these policies.

Policy EC10.2

Minimising Carbon Dioxide

- 5.34 The redevelopment of this part of RRP would allow modern, sustainable construction methods to be applied, where appropriate. The efficient use of energy and resources can minimise impacts on the environment and limit carbon dioxide emissions over the lifetime of the development.
- 5.35 The site is a well established Retail Park and the proposed units would allow for additional linked trips to be made. The Sainsburys foodstore that neighbours the application site, as well as the existing warehouse units, would compliment this.
- 5.36 The site is accessible to a choice of means of transport with the A259 New Road being part of the South Coast cycle link that links the site linking it to nearby towns including Littlehampton and Rustington.

Accessibility

- 5.37 As identified above the site is accessible by a choice of means of transport, in particular with strong cycle and pedestrian links along the A259. The site is well connected to nearby by towns.

5.38 There is a bus stop at the neighbouring Sainsbury's which provides a free service to local areas. This service operates along seven different routes linking the site with Rustington, Bognor Regis, Storrington, Wick, Findon, Durrington and Goring. There are additional bus stops located 400m away on the A259.

5.39 Angerming rail station is located 600m away providing a regular service to nearby towns.

High Quality and inclusive Design

5.40 It has been explained earlier in this section that the existing building is out-dated and that planning permission would allow the building to be designed to meet current sustainable construction methods.

5.41 Refurbishment of the existing building is an opportunity to improve the character of the area through the introduction of a new, contemporary appearance within RRP.

Social and Economic Regeneration

5.42 The refurbishment of the unit will enhance the appearance of RRP and the locality, bringing physical regeneration benefits. The introduction of a range of retail warehouse units would result in significant local employment opportunities as well as boosting the local economy. A new employer is likely to provide retail training programmes for staff.

Local Employment

5.43 The new stores would provide approximately 60 full and part time positions across a range of roles including management and core retail positions (Source: Employment Densities Guide, 2010 – HAC). The actual development will generate local construction jobs and investment.

Policy EC16.1

5.44 The criteria for policy EC16.1 largely reflect the impact considerations that were set out in PPS6.

Impact on Public/Private Investment

- 5.45 The Littlehampton Vision identifies a series of development opportunities within the town. Rather than a single regeneration objective for the centre these are individual options that, cumulatively seek to improve the town centre environment and encourage investment. It has been identified earlier in this report that a number of these opportunities have come to fruition, such as the new Lidl store at Clifton Road and the planning consent for a mixed use development at the Market and depository site. Other opportunity sites are for a range of alternative uses that do not include retail.
- 5.46 Rustington Retail Park is a well established retail warehouse park and the application proposals will contribute to investment within the district and is unlikely to undermine investment within existing centres.

Impact on Vitality and Viability

- 5.47 A detailed town centre health check has been undertaken on behalf of the applicant (**Appendix 5**). The findings establish that **Littlehampton town centre** is a healthy, vital and viable centre which benefits from a good diversity of uses and good environmental quality. Planning Permission was recently granted for 600 new homes that will result in significant additional investment in the town
- 5.48 The centre plays an important function within the district, providing a range of services and facilities for its extensive rural catchment. Although the centre cannot be considered to be fragile or vulnerable, because of its size it faces competition from the larger towns in the district and beyond as they seek to strengthen their retail offer.
- 5.49 The centre is a popular tourist destination. The attractive and historic urban fabric coupled with its water setting draws visitors to the centre that supplements the vitality of the centre.
- 5.50 **Rustington district centre** is a busy centre that accommodates a diverse range of uses. It performs a very strong district centre role, in respect of the PPS4 definition, with several supermarkets located in the centre, a range of non-retail services as well as other public facilities. It demonstrates low vacancy rates and suggests strong investor confidence. The centre is carefully managed to ensure its continuing success. Consequently, it is considered a healthy centre which

performs a role in terms of fulfilling local need for a range of convenience, comparison and non-retail services.

- 5.52 Because of the application sites location on the A259 it is anticipated that the scheme would encourage linked trips, rather than becoming a new key retail destination point. Customers would have been already been making that trip, or visiting the neighbouring Sainsbury's. In addition it is considered that the type of retailing would vary significantly from the type of comparison retailers within the centres.

Impact on Allocated Sites

- 5.53 It has already been stated that there are no allocated sites within the Local Plan, although the Littlehampton Vision does identify a number of development opportunity sites. Those sites that were considered suitable for retail development have either been built out or have received planning consent for development. Consequently, it is considered that the development will not impact on allocated sites.

Impact on In-Centre Trade/Turnover

- 5.54 The 2008 RIA (**Appendix 3**) considered retail impact and concluded that there was significant comparison goods capacity within local and district centres for the proposals, identifying an equivalent capacity in non-town centre floorspace as follows:

£11m in 2011; £17m in 2013; and £34m in 2017

- 5.55 The Arun Retail Study Update 2010 was produced as a consequence of the economic downturn to assess an earlier retail study based on lower forecast expenditure rates. This study identified the 2008 permission (R/72/08) as a commitment in its retail capacity forecasting model (Table 33 – **Appendix 6**). In table 34 of **Appendix 6** it is shown that even including existing commitments at 2010 that there would be a capacity for comparison goods of 1,300sqm at 2016.

- 5.56 Consequently, the DTZ 2010 study identified that there would be additional retail capacity in 2016 even when the extant consent had been included as a commitment. It is recognised that these figures should be used as a guide, but it does demonstrate that even with cautious growth rates that there is available expenditure for comparison goods retailing.

5.57 Since the publication of the 2010 DTZ study there have been no other retail warehouse schemes in the locality that have been consented. Therefore, both the supporting RIA for the 2008 consent and the DTZ 2010 study remain relevant.

5.58 Following the imposition of the planning condition restricting the range of goods that could be sold the Officer accepted in their report on the 2008 consent (**Appendix 4**) that:

"Although the existing unit is restricted only to non-food its only occupier would meet the terms of "bulky goods" type store, and in this way has little impact on the existing town centres. The Retail Consultant has indicated that if the new stores were restricted to bulky goods then the impact in the town centres would be minimal, and the proposal would be in line with PPS6."

5.59 Consequently, the renewal of the consent for bulky goods, retail warehousing would not undermine in-centre trade or turnover.

Summary

5.60 Policy EC17.1 requires that for out-of-centre retail proposals, which are not in accordance with an up-to-date development plan, it must be confirmed that:

- The proposal complies with the requirements of the sequential approach; and
- There is no 'clear evidence' that the proposal will result in a 'significant adverse impact' on any one of the impacts identified in Policy EC10.2 and EC16.1.

5.61 The consideration of impacts within this section has demonstrated that the proposals will address the relevant criterion of policy EC10 of PPS4:

- They will not result in significant adverse impact on carbon dioxide emissions;
- The redevelopment of the existing unit will allow for modern construction methods to be applied;
- The proposals would give rise to linked trips and the site is accessible by a range of transport choices;
- The proposals will result in the redevelopment of an outdated unit;

- Local employment opportunities will be boosted which will have economic spin off benefits to the local area.

5.62 Furthermore, in addressing Policy EC16.1, it has been demonstrated that the proposal will not result in significant adverse impacts on the criteria set out:

- Planned public or private investment in a centre. It has previously been demonstrated to and accepted by the Council that these proposals would not have a significant impact on existing centres or planned investment, subject to sufficient controls being placed on it.
- The vitality and viability of Littlehampton Town Centre and Rustington District Centre will not be compromised by the proposals. Both centres have been shown to demonstrate healthy characteristics that are already supported by a range of convenience retailing from both national and independent retailers.

5.63 Consequently, the compliance of the proposals with PPS4 has been demonstrated.

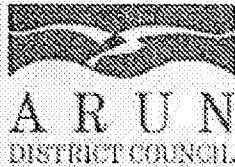
6. Conclusions

- 6.1 This application seeks the renewal of an extant planning consent (R/72/08) for the demolition of the existing Focus unit and the creation of three new retail units.
- 6.2 The previous occupiers went into receivership earlier in 2011 and the unit is now vacant. It has been actively marketed with little interest in the market. The unit is in excess of 20 years old and it has been demonstrated that it is outdated for modern retailer requirements. Consequently the applicants seek to extend the planning consent in order to maintain viable options for redevelopment at the Retail Park.
- 6.3 A planning condition was placed on the extant permission restricting the range of goods that could be sold, in keeping with a retail warehouse operation. The Officer's report for that application, based on Retail Consultants advice, was that this would be satisfactory to control the potential impact the proposals could have on surrounding town centres.
- 6.4 It has been demonstrated that there are no sequentially preferable sites available that could accommodate the development. It has also been shown that no significant retail warehousing development has come forward in the past three years, that the Arun Retail Study 2010 identifies significant capacity and that there would be a negligible impact arising from the renewal of the application.
- 6.5 The renewal of the extant planning permission (R/72/08) would meet the tests of PPS4 and should therefore be extended for an additional period of three years.



R/72/08/

ARUN DISTRICT COUNCIL
TOWN AND COUNTRY PLANNING ACT 1990



DECISION NOTICE

Application Ref: R/72/08/

1 To Addressee

Mr S Macklen
Barton Willmore Planning Partners
35 Kings Hill Avenue
Kings Hill
West Malling
ME19 4BW

2 Site Address

Land At Rustington Retail Park
New Road
Rustington

3 Description of Development

Alterations to Rustington Retail Park to incl. the demolition of the existing Focus Unit (& associated garden centre), relocation of electricity sub-station, construction of 3 retail units (including garden centre), alterations to car park & associated landscaping alterations

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 plan and subject to compliance with the conditions specified.

CONDITION 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).

CONDITION 2 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 and roofs 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 policies DEV1 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

CONDITION 3 No development shall take place unless and until there has been submitted to and approved by the Local Planning Authority a scheme of landscaping/hard and soft, which shall include indication of all existing trees and hedgerows on the land, and details of any to be retained, together with measures for their protection in the course of development.

Reason: In the interests of amenity and of the environment of the development in accordance with policies DEV1 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

CONDITION 4 All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons 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 5 years from the completion of the 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 policies DEV1 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

CONDITION 5 No development shall take place until details of screen walls and/or fences have been submitted to and approved by the Local Planning Authority and no dwellings/buildings shall be occupied until such screen walls and/or fences associated with them have been erected.

Reason: In the interests of amenity in accordance with policies DEV1 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

CONDITION 6 The retail warehouse hereby permitted shall not be used otherwise than for the sale of furniture and floorcoverings; domestic electrical and gas appliances; cycles and cycle parts and accessories; pets and pet supplies; stationary and office supplies and equipment; hardware, DIY goods and decorators' 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 instrument revoking and re-enacting that Order with or without modification).

Reason: To protect the vitality and viability of the town centre and the prospect of town centre developments in accordance with PPS6 and policy DEV27 of the Arun District Local Plan.

CONDITION 7 The building shall not be occupied until the 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 policies DEV1, DEV5 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

CONDITION 8 The use of any land for car parking shall not be commenced until it has been laid out, surfaced and drained and such land shall not be used thereafter for any purpose other than the parking of vehicles.

Reason: To ensure a satisfactory standard of development in accordance with policies DEV1, NE17 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

CONDITION 9 The building hereby permitted shall not be occupied until space has been laid out within the site in accordance with details approved by the Local Planning Authority for the turning of vehicles clear of the public highway and such space shall not thereafter be used other than as a turning area.

Reason: In the interests of road safety in accordance with policies DEV1, NE17 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

CONDITION 10 The development hereby approved shall not be occupied until a Travel Plan completed in accordance with current advice from the Department of Transport has been submitted to and approved in writing by the Local Planning Authority.

Reason: To promote and encourage sustainable transport amongst staff in accordance with policy DEV4 of the West Sussex Structure Plan.

CONDITION 11 The development shall not proceed until details of the proposed surface water and means of disposal have been submitted and approved by the Local Planning Authority. Surface water drainage shall be carried out in accordance with such details and in conjunction with associated building works.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies DEV1 of the West Sussex Structure Plan and GEN7, GEN9 of the Arun District Local Plan.

CONDITION 12 If during development, any visibly contaminated or odorous material not previously identified is found to be present at the site it must be investigated. The local planning authority must be informed immediately of the nature and degree of contamination present. The developer shall submit a Method Statement which must detail how this unsuspected contamination shall be dealt with.

Reason: To ensure that the development complies with approved details in the interests of protection of controlled waters in accordance with PPS23 Planning and Pollution Control.

CONDITION 13 No development shall take place within the area indicated (this would be the area of archaeological interest) until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

Reason: The site may be of archaeological significance and it is important that it is recorded by excavation before it is destroyed by development in accordance with policies CH7 of the West Sussex Structure Plan and AREA17 of the Arun District Local Plan.

CONDITION 14 Details of any external lighting/floodlighting shall be submitted to and approved in writing by the Local Planning Authority before the use hereby permitted commences and the building is occupied. Development shall be carried out in accordance with the approved details.

Reason: to safeguard the amenities of nearby residents in accordance with policies DEV1 of the West Sussex Structure Plan and GEN7, GEN33 of the Arun District Local Plan.

CONDITION 15 All external glazing should be laminated. Final exit doors and windows shall accord with LPS1175 SR3. Final doors which open outwards should have hinge bolts.

Reason: To help crime prevention in accordance with GEN18 of the Arun District Local Plan.

INFORMATIVE: The applicant should note that under Part 1 of the Wildlife and Countryside Act 1981, with only a few exceptions, it is an offence for any person to intentionally take, damage or destroy the nest of any wild birds while the nest is in use or being built. Birds nest between March and September and therefore removal of dense bushes, ivy or trees or parts of trees etc. during this period could lead to an offence under the act.

INFORMATIVE:

Summary of Reasons for Grant Article 22(1) General Development Procedure Order 1995

SUMMARY

This planning permission is granted because it complies with the policies listed below in that the development would not cause any material adverse effect on visual or residential amenity on the surrounding area and its character and there are no material considerations to indicate otherwise.

RELEVANT POLICIES

STRUCTURE PLAN: DEV1, LOC1, NE5, NE10, NE17, CH1, ERA1, DEV6, CH7, DEV4,

LOCAL PLAN: GEN7, GEN2, GEN12, DEV26, DEV27, GEN9, GEN18, GEN32, GEN33,

NATIONAL POLICIES: PPS1, PPS6, PPG13, PPG16, PPS23, PPS24,

This is only a summary of reasons for granting to comply with Article 22 and full reasons appear in the Officer report.

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

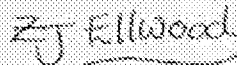
Case Officer: Mr K Whewey

Date of Decision:

3rd October 2008

Date Decision Issued:

3rd October 2008



Zachary Ellwood
Interim Head of Development Control

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

ARUN DISTRICT COUNCIL:R/72/08/

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 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 Planning Inspectorate, Customer Support Unit, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN.

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 First 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 District Council in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town & Country Planning Act 1990.



RUSTINGTON · Rustington Retail Park



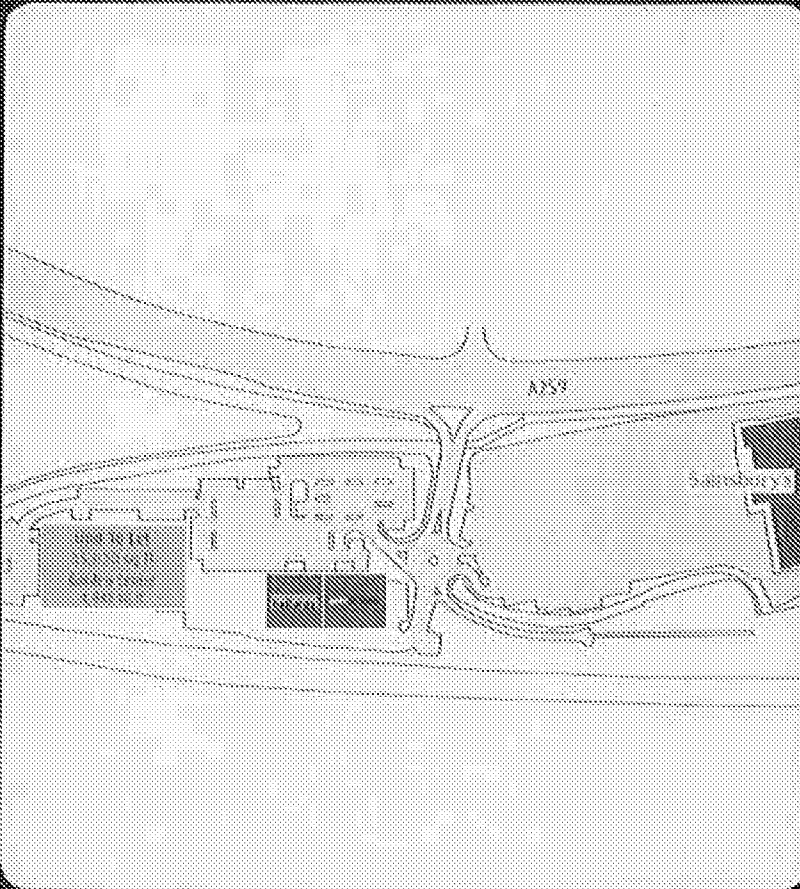
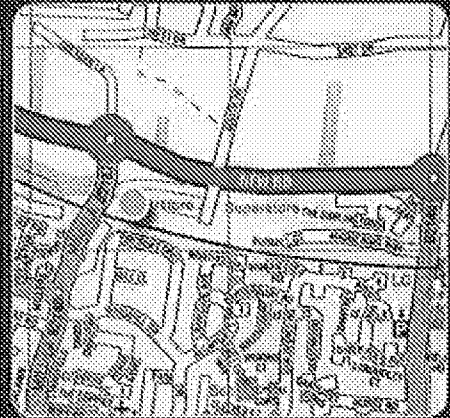
BN16 3RT

**35,020 sq ft plus 4,443 sq ft garden centre
available to let**

Prominent Open A1 (food/non-food) retail
warehouse unit to let on assignment or sublease.

RIDGEMOOR

RUSTINGTON • Rustington Retail Park



Location

Rustington is located on the Sussex coast approximately 6 miles West of Worthing and 7 miles East from Bognor Regis. The subject unit is situated adjacent to a Pets at Home, Halfords and a Sainsbury's foodstore.

Demographics

Rustington has a resident population of over 15,000 people. Within a 15 minute drivetime catchment, there are over 71,000 people and an estimated bulky goods spend of approximately £61 million. (CACI 2011).

Unit

The subject unit provides a ground floor GIA of 35,020 sq ft with surface level car parking. There is also the potential to install a mezzanine, subject to planning.

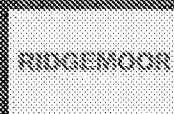
Planning

The current planning consent allows Open A1 (food/non-food) goods to be sold from the premises.

Availability

The unit is available by way of an assignment or sub-lease. Current lease expiry is September 2013 with a passing rent of £470,464 per annum.

Further Information

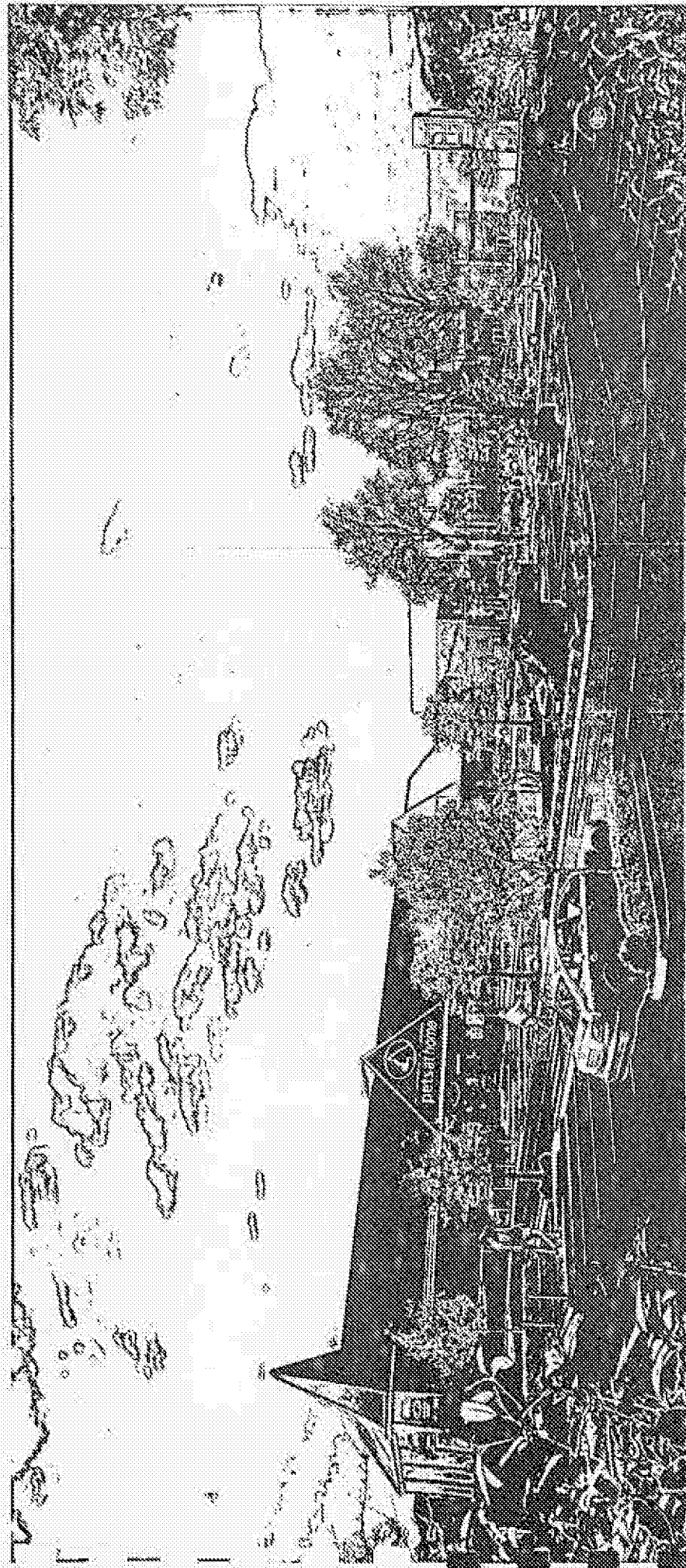


Richard Nixon
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Rustington Retail Park
Planning, Design and Access Statement

on behalf of
Store Property Investments Ltd

February 2008

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February 2008

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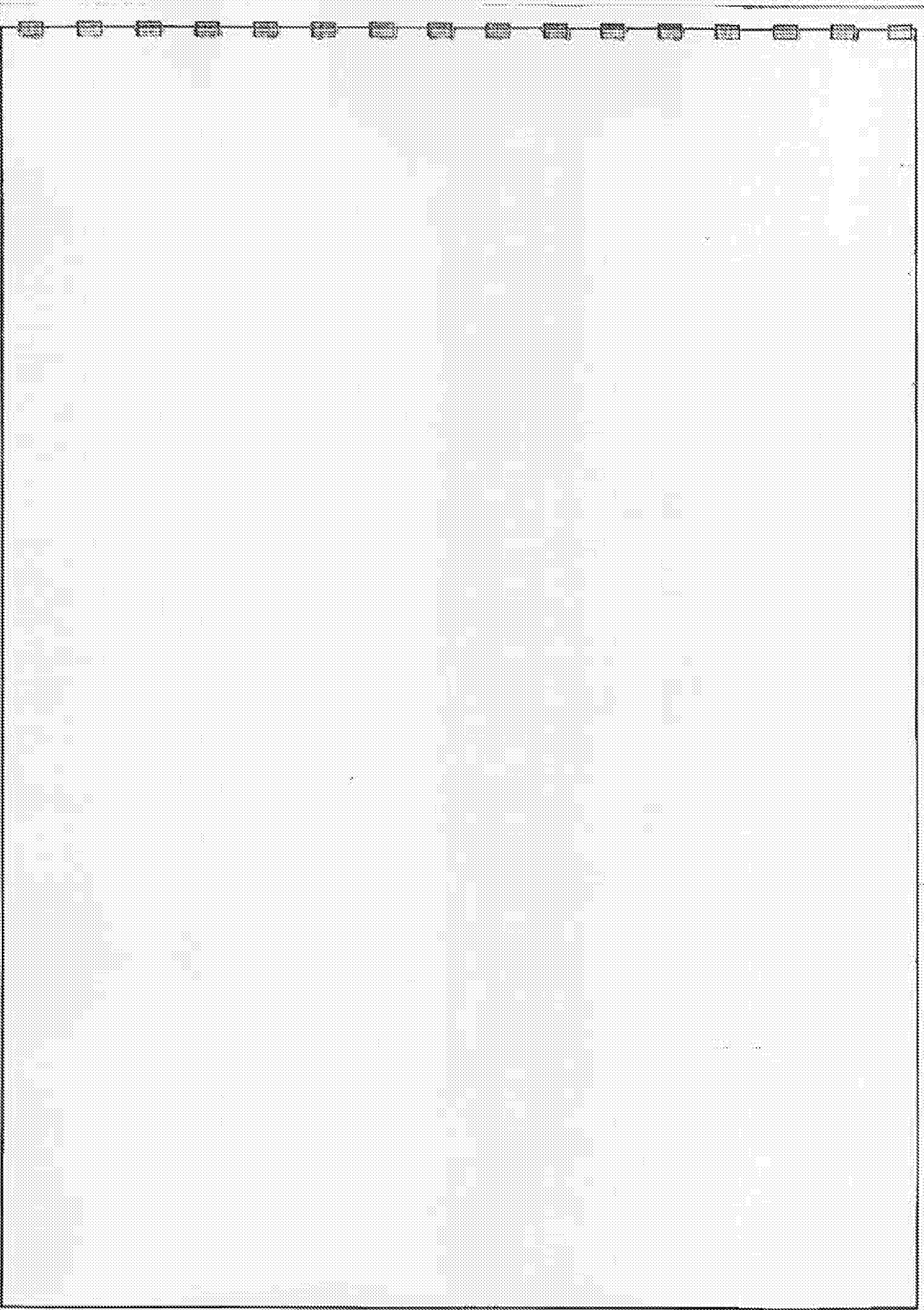
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9.0 Summary



1.0 Introduction

This Planning, Design and Access Statement has been prepared in support of a Full Planning Application for the part refurbishment of Rustington Retail Park, on behalf of the applicant (Store Property Investments Ltd).

The Application proposals comprise the demolition of the existing Focus Unit (3,253 sq m ground floor area), relocation of electricity substation, and the construction of three new retail units, totalling a ground floor area of 4,181 sq m. Unit 1 will comprise a gross area of 2,508 sq m, plus a mezzanine of 111 sq m for staff/ office use, whilst Units 2 and 3 will comprise a ground floor area of 929 sq m and 743 sq m respectively, and both will include mezzanine floor cover totalling 465 sq m gross within Unit 2 and 372 sq m within Unit 3. The proposal also seeks the relocation and enlargement of the existing garden centre currently attached to the existing Focus unit.

In addition it is proposed to reconfigure the existing car parking layout, to provide for a total of 240 car parking spaces, of which 12 will be disabled parking bays. The reconfigured layout will also allow for 20 cycle bays, as well as a pedestrian walkway, and crossing points. It is also proposed to create a pedestrian access point at the north of the Retail Park, allowing access part way along the adjoining footpath and cycleway.

DCLG Circular 01/06 advises that major planning applications should be accompanied by one statement that covers both design and access, allowing applicants to demonstrate an integrated approach that will deliver inclusive design, and address a full range of access requirements throughout the design process. Paragraph 81 of the Circular states that a design and access statement should explain the design principles and concepts that have been applied to a proposal providing an explanation and justification for the following particular aspects of a development, including the amount of development; the layout; the scale; the landscaping; and the appearance of a development. The Circular also clearly states that it is a requirement for a statement to include an access component.

This Design and Access Statement fully accords with this Government advice and responds to the assessment; involvement; evaluation; and design process methodology.

This Statement comprises:

Section 2.0 - the site area appraisal
 Section 3.0 - details of the planning history
 Section 4.0 - a summary of the application proposal
 Section 5.0 - planning policy background
 Section 6.0 - design principles
 Section 7.0 - design and access considerations
 Section 8.0 - other technical documents

and

Section 9.0 - a summary.

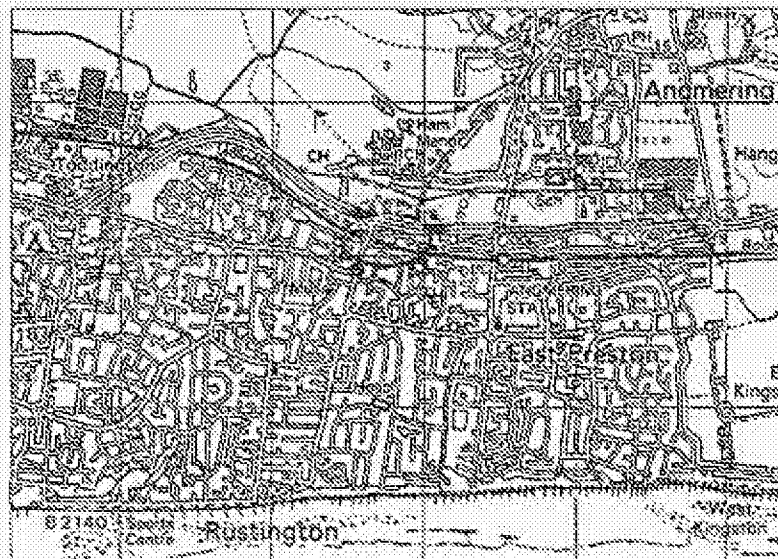
2.0 Site and Area Appraisal

2.1 Location Context

The application site comprises the westerly part of Rustington Retail Park. Rustington Retail Park itself is located to the south of the A259 (New Road), a dual carriageway which serves as a by-pass to Rustington, and beside the former A259, which now serves as a footpath and cycleway. The site is located some 850 metres north of the defined Rustington Centre, as well as falling within the defined urban area within the Adopted Local Plan. Given the distance of the application site from the nearest centre it is considered to be in an out-of-centre location as defined by PPS6: Town Centres and Retail.

Rustington Retail Park is surrounded by residential properties to the south (beyond the rail line), and open country side to the north (beyond the A259).

Figure 2.1: Town Location Plan



Directly north of the site, beyond the cycle and footpath, lies a triangular area of woodland, which abuts the A259 (New Road) and Mill Lane. This area of woodland provides screening of the western aspects of the Retail Park from the A259. The area to the north of Rustington Retail Park is defined as a strategic and local gaps policy area within the Adopted Local Plan.

To the west of the site opposite Mill Lane lies an area of open space which abuts the A259 New Road. It is understood that this site benefits from outline planning permission for the development of car showrooms (ref: A148/05).

To the south east of the site, and south of Sainsbury's lie a series of static mobile homes. Residential dwellings are located further east of Sainsbury's.

Figure 2.2: Aerial Photograph annotated with local amenities



2.2 Site Context Analysis

Rustington Retail Park itself is bounded by a rail line to the south. The entire southern boundary of the site benefits from tree cover. A Halfords and Pets at Home unit abut the application site to the east whilst a Sainsbury's foodstore with associated car parking is situated further east beyond the main access road.

Whilst the topography of the site itself is flat, the land to the north and west of the site rises as Mill Lane crosses the rail line.

Figure 2.3: View from A259

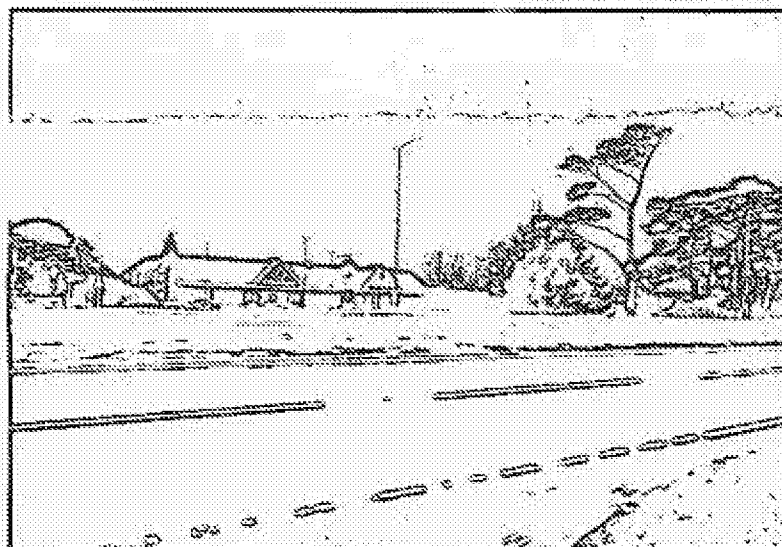


Figure 2.4: View from A259

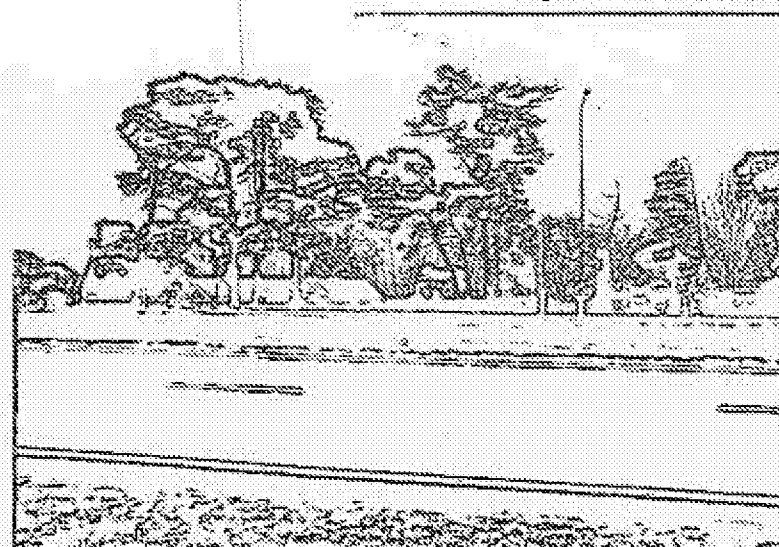


Figure 2.5: Views Into Site

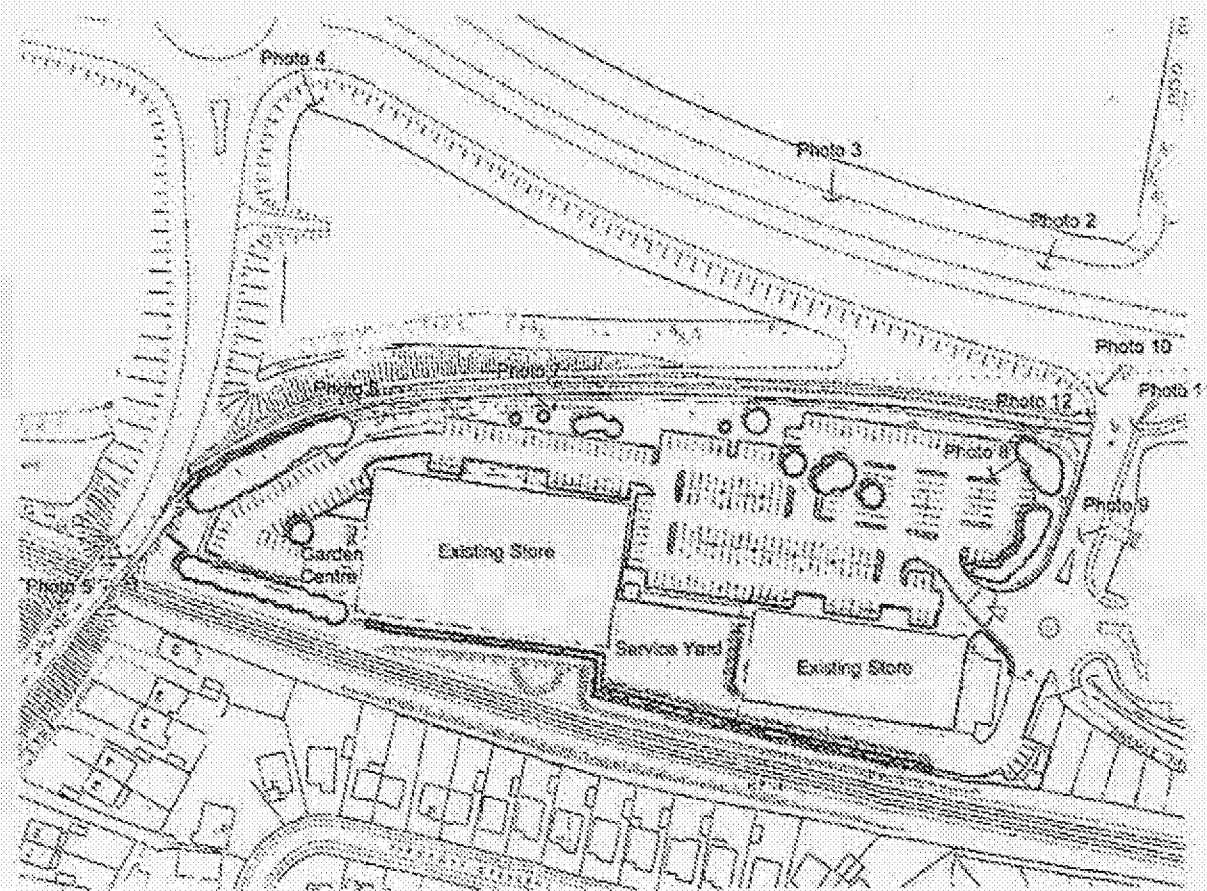


Photo 1

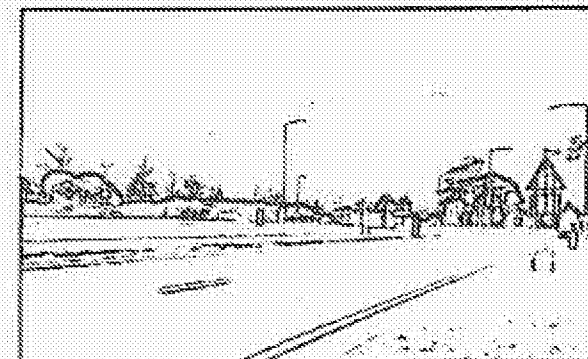


Photo 1

Photo 5

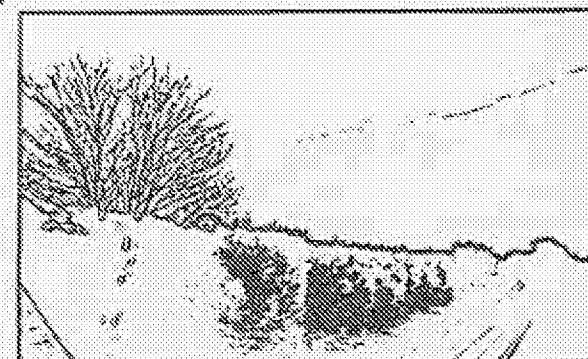


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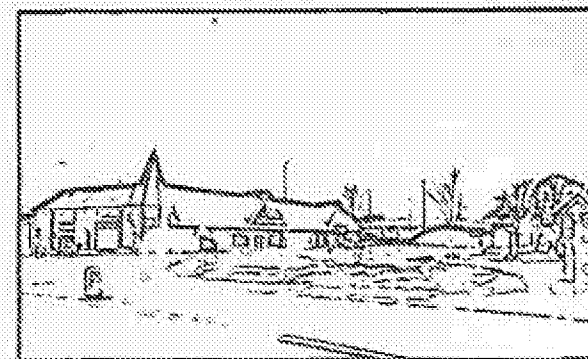


Photo 2



Photo 3

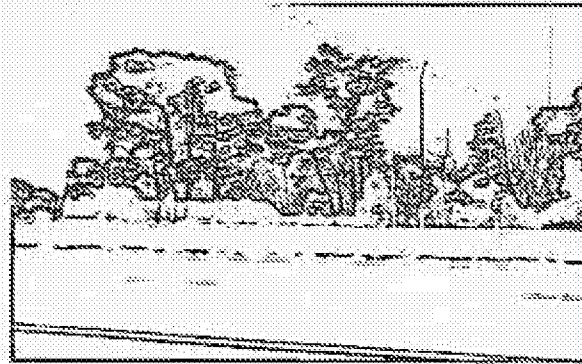


Photo 4



Photo 6

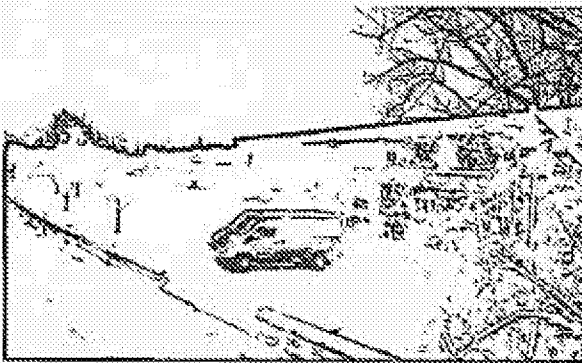


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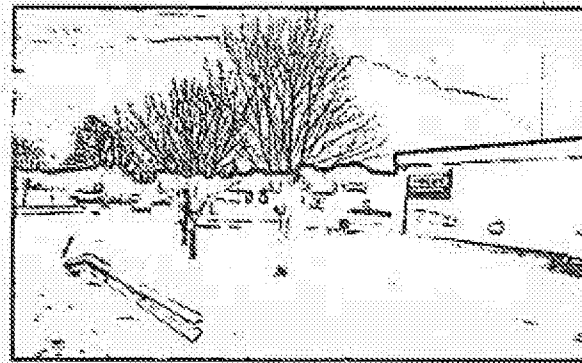


Photo 8

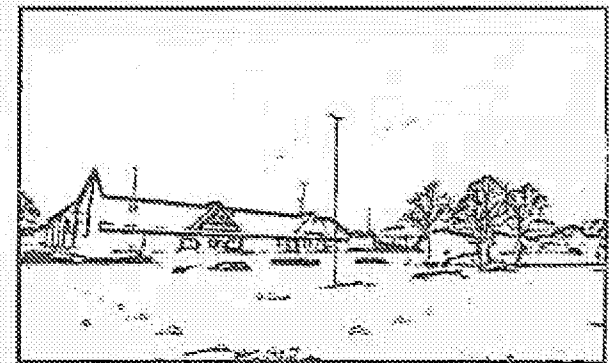


Photo 10

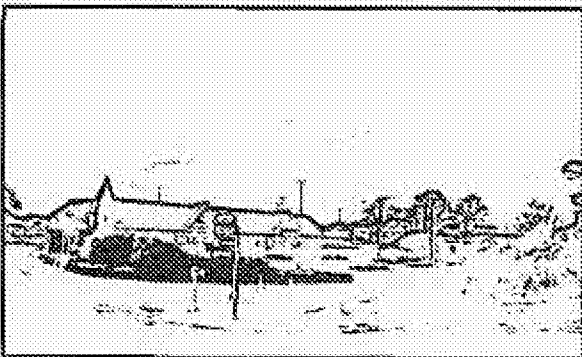


Photo 11

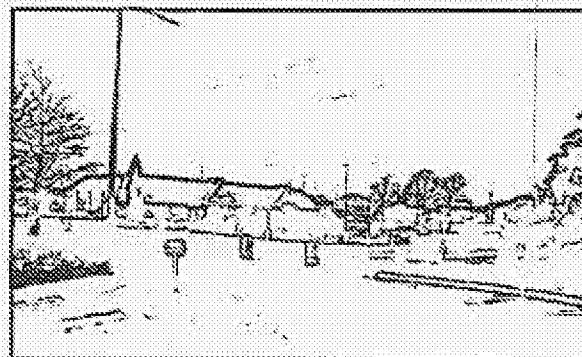
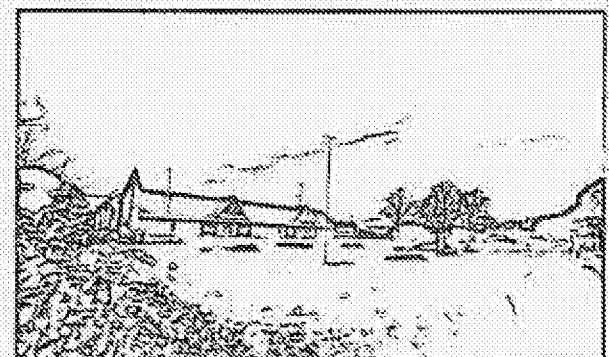


Photo 12



2.3 Site Description, Constraints and Opportunities

The Application Site comprises an area of 1.6ha and includes the central and western parts of Rustington Retail Park. The site itself comprises the area of car parking associated with the western part of the Retail Park, as well as the existing Focus unit, associated garden centre, servicing yard and electricity substation.

The existing Retail Park was granted planning permission in 1987 and currently comprises a Focus Unit of 3,252 sq m gross, as well as a Halfords Unit and Pets at Home Unit of 697 sq m and 995 sq m gross respectively. It should be noted that both the Halfords and Pets at Home Units fall outside of the proposed refurbishments works, and have therefore been excluded from the red line site boundary. A Sainsbury's foodstore is also located to the east of the central access road. All of the non food units on the Retail Park benefit from Open A1 non food permission.

Figure 2.6: Site Location Plan

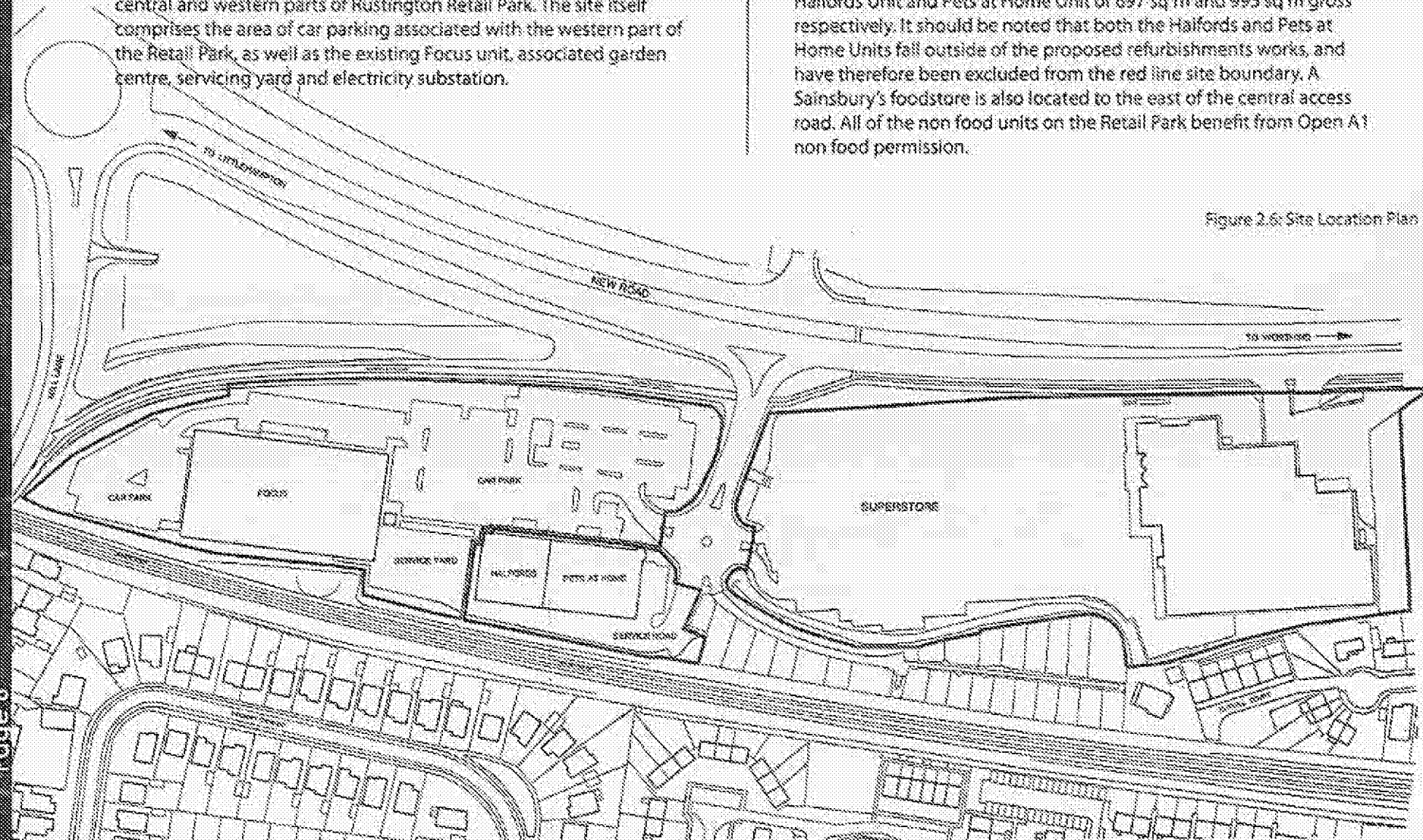


Figure 2.7: Existing Site Plan

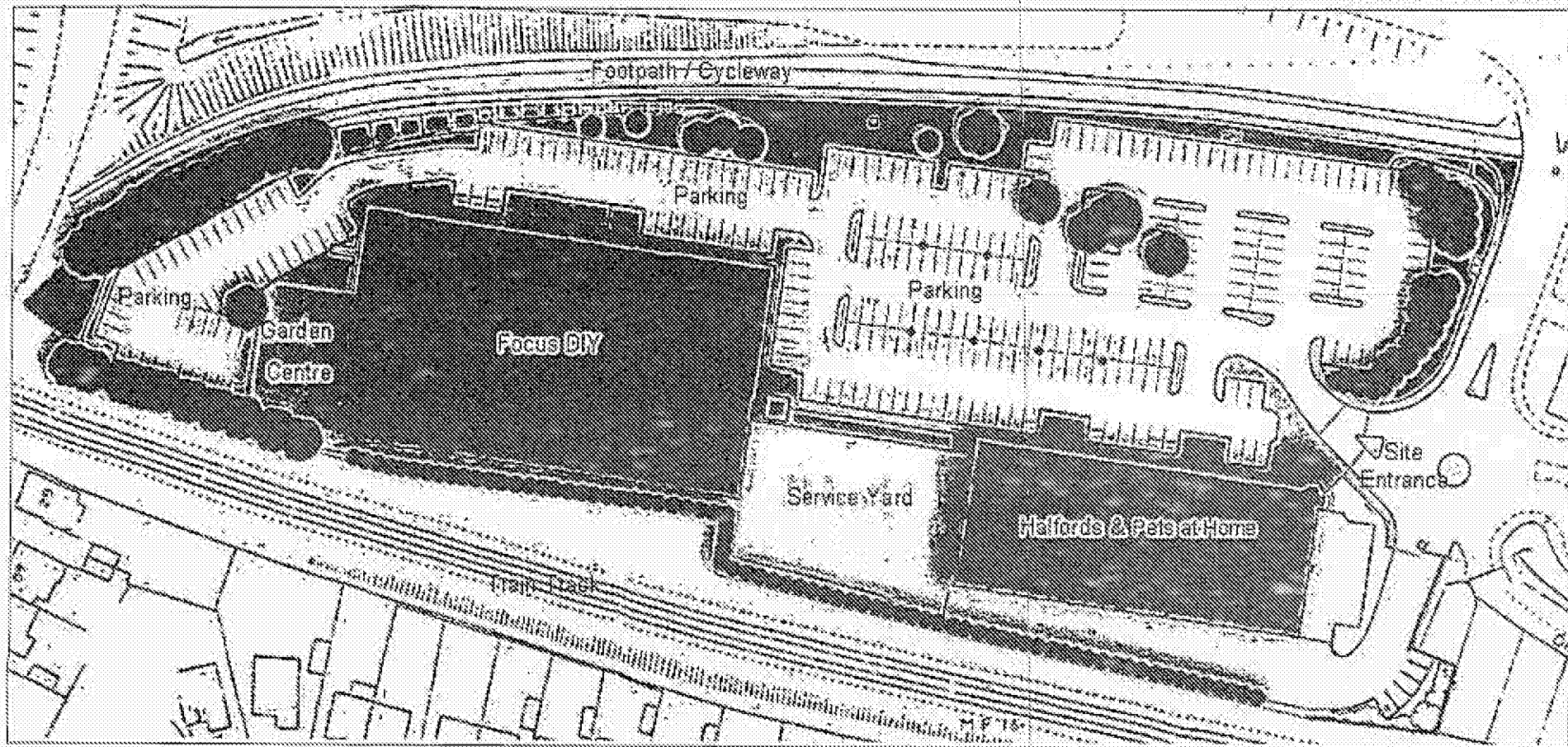
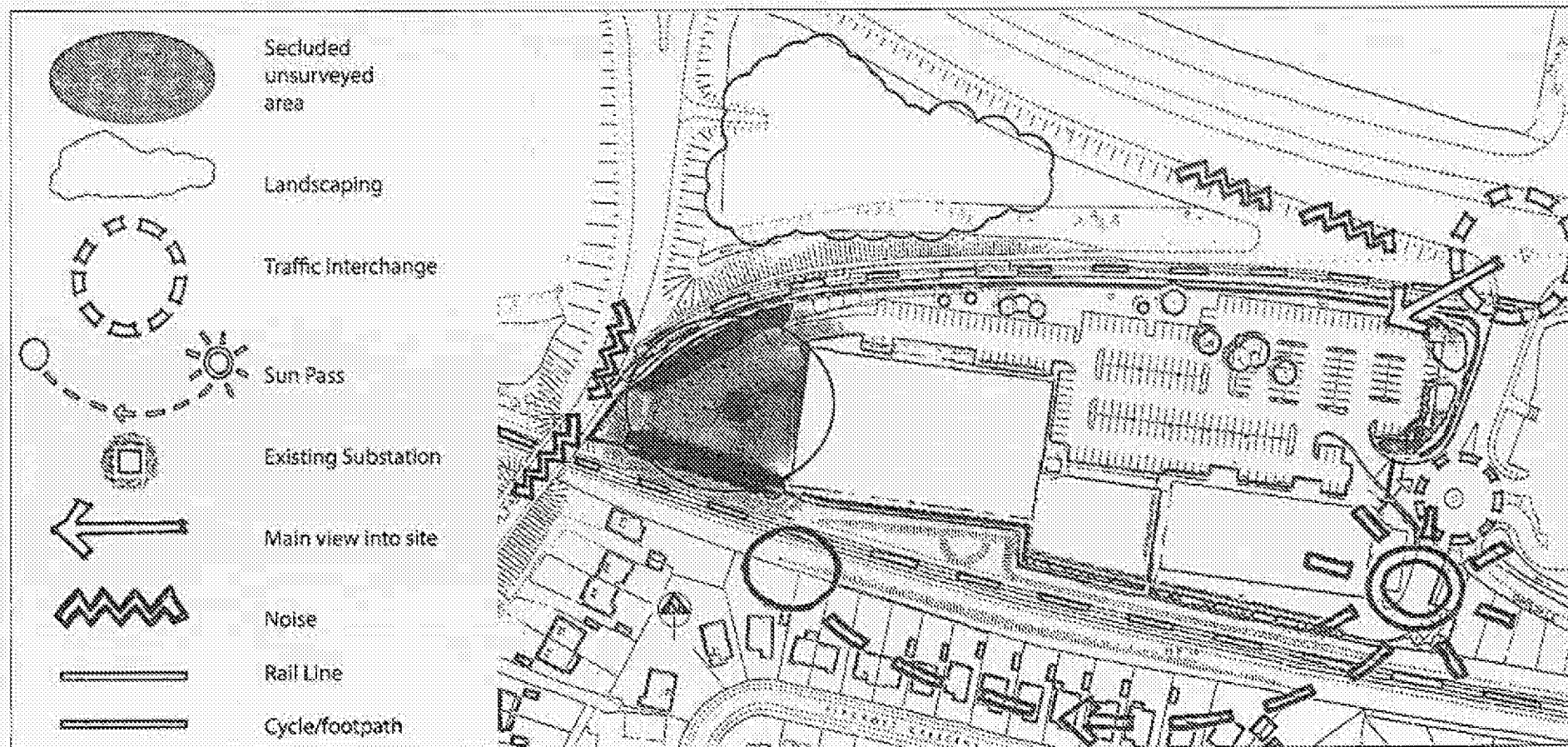


Figure 2.8: Constraints and Opportunities Plan



The non food retail units on the Retail Park were built out in two separate phases and as a result there are poor linkages between the units, as well as differing styles of design applied to the Focus Unit compared with Halfords/ Pets at Home terrace (see Figures 2.9 & 2.10).

Figure 2.9

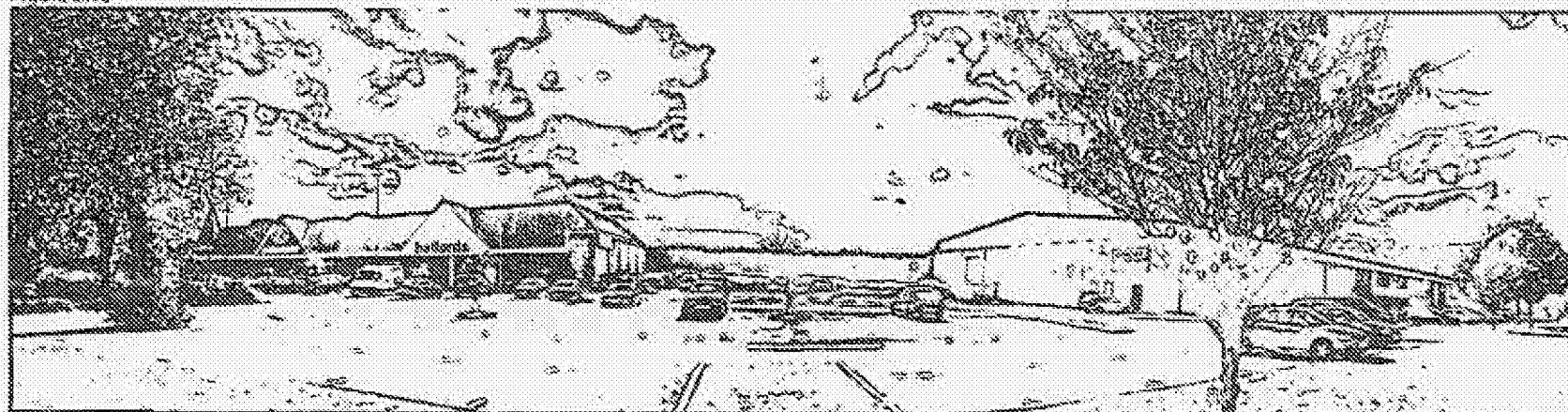


Furthermore due to the configuration of the Focus Unit, the plain side elevation of the store is very prominent within the site (see Figure 2.11).

Figure 2.11



Figure 2.10



The remaining retail units contained within Rustington Retail Park, including Sainsbury's, are all clad in brickwork with tiled and pitched roofs.

The current configuration of the Retail Park does not provide for linked trips between the Focus Unit and other units on the Retail Park. As a result the Focus Unit is considered somewhat disconnected from the other units on the park. Furthermore the additional public car parking provided to the western side of the Focus unit, is not well used, due to its isolated nature (see Figure 2.12).

Rustington Retail Park itself comprises a total of 807 car parking spaces, of which 301 are located to the front of both the Halfords and Pets at Home Units, as well as to the front of the Focus unit.

Figure 2.12



An area of car parking is also provided to the western elevation of the Focus unit. A further 506 spaces are provided besides the Sainsbury's foodstore. Servicing to the existing Halfords, Pets at Home and Focus units is provided via the A259, and past the rear of the existing Halfords and Pets at Home Units.

Pedestrian access between the non food retail units to the west of the Retail Park and Sainsbury's is limited, and there is a 'desire' line opposite the pathway which leads from Sainsbury's car park to the main access road indicating pedestrians preference when walking between the retail units (see Figure 2.13).

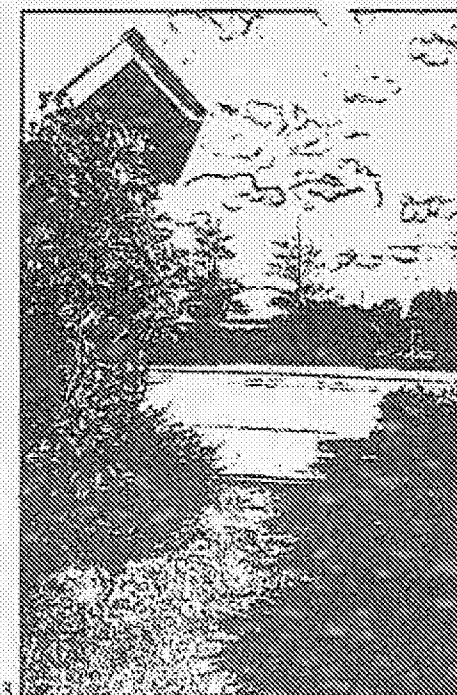


Figure 2.13

As discussed, access and egress from the Retail Park is provided from the A259, where the access road also provides access to a Sainsbury's foodstore to the east of the Retail Park. The current access arrangements from the A259 are the subject of separate discussions with the Highways and Transport Department of West Sussex County Council. It is understood that works to improve the junction of the A259 and Rustington Retail Park/ Sainsbury's are budgeted for the period 2008/09 for which our Client is in discussion with Sussex County Council to part fund.

In summary we consider that the key constraints and opportunities are as follows:

Parking to the western side of the Focus Unit: This area of parking is very unwelcoming, given that its location is dominated by the side elevation of the Focus unit to the east, and steep bank of Mill Lane to the west. This also results in little sunlight reaching this part of the site. As a result this part of the site is under-utilised.

Electricity sub station: This is currently located besides the eastern side elevation of the Focus Unit, and due consideration will need to be given to the relocation of the substation should development take place within this location.

Linkages: Due to the phased development of Rustington Retail Park, the Focus Unit does not sit well with the other units on the Retail Park. There is an opportunity to improve the linkages between the retail units, both on the western side of the Retail Park, as well as with Sainsbury's.

Pedestrian and cycle access: Pedestrian access within the site is fairly limited. Better linkages could be made with the footpath and cycleway to the north of the site, and the pedestrian linkages between Sainsbury's and the non food units are disjointed. There is an opportunity to provide greater access within the site for both

pedestrians and cyclists.

In the interest of pedestrians and cyclist safety in particular, where possible the servicing of retail units should be provided separate of the main car parking area.

Impact on the surrounding area: The site benefits from well established tree cover to its southern boundary, which combined with the rail cutting means that there is little if any impact on the residential properties to the south from the retail units.

The Application Site is set down from both the wooded area to the north as well as the A259 and Mill Lane to the west. As a result the Application Site can only be viewed of the site, at its point of access with the A259, when travelling west bound.

3.0 Planning History and Background

Planning permission was granted for the development of land now comprising Rustington Retail Park in several stages between 1987 and 1995. The planning history detailed below concerns the non food retail element of the Retail Park to the west of the access road, all of which were approved.

R/231/86 – 35,000 sq ft of non food retail warehouse space, with associated vehicle parking to County planning standards, site roads and alterations to existing highways (Land on south side of New Road between Windmill Bridge and Darlington Mushroom Laboratories, Rustington) – 14 January 1987

(Condition 14 of this permission, stated that the proposed building shall be used for a non food retail warehouse, and for no other purpose.)

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 to County Planning standards, site roads and alterations to existing highways (Land on south side of New Road between Windmill Bridge and Darlington Mushroom Laboratory, Rustington) – 10 August 1987

R/272/87 – Outline application for 18,000 sq ft of non-food retail warehouse space and associate car parking (Land on south side of New Road between Windmill Bridge and Darlington Mushroom Laboratories, Rustington) – 16 December 1987

(Condition 5 of this permission, stated that the proposed building shall be used for a non food retail warehouse, and for no other purpose.)

R/269/87 – Revisions to car parking and access road layout from that approved under planning permission R/194/87 – 21 December 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 – 26 July 1988

R/135/94 – Formation of new external compound as garden centre (Do it All Ltd, New Road, Rustington) – 30 November 1994

R/171/94 – Details in pursuance of R/272/87 for non-food retail warehouse space-altered elevations and floor plan payout (previously approved and partly implemented under consent R/216/88) (Land on south side of New Road between Windmill Bridge and Darlington Mushroom Laboratories, Rustington) – 8 March 1995

R/172/94 – Alterations and improvement of access and car parking layouts with the provision of new landscaping areas (Land on south side of New Road between Windmill Bridge and Darlington Mushroom Laboratories, Rustington) – 8 March 1995

R/32/95 – 1,690 sq m of non food retail units (between Do it All and J Sainsbury Superstores) – 28 June 1995

(Condition 5 of this permission, stated that the proposed building shall be used for a non food retail warehouse, and for no other purpose.)

R/54/06 – Construction of a restaurant building for use within Class A3 of the Use Classes Order 1987 (as amended) - 20 June 2006

Whilst extant planning permission exists for the construction of a restaurant in the north eastern corner of the Retail Park, our client (Store Property Investments Ltd) has confirmed that should planning permission be granted for the subject Application proposals then the restaurant would not be built out, and therefore the extant planning permission could be conceded.

4.0 Application Proposal

The Planning Application seeks the approval of full planning permission for the demolition of the existing Focus unit, and the construction of three retail units, including a replacement garden centre. The application also seeks the relocation of the electricity substation and alterations to the existing car park with associated landscaping provision. The proposed units will be located to the west of the existing Halfords and Pets at Home Units on Rustington Retail Park.

The existing Focus unit comprises a gross ground floor area of 3,253 sq m, ancillary office floorspace at first floor level of 102 sq m, and an existing garden centre of c.414 sq m. This unit also benefits from an Open A1 non food permission (planning application reference R/231/86).

Of the three proposed units, Unit 1 will comprise a ground floor area of 2,508 sq m, as well as a mezzanine of 111 sq m for ancillary offices/ storage. In addition it is proposed to construct a garden centre compound of 641 sq m which will be located to the rear of Unit 1 and will be an ancillary part of the retail operation of this unit. Unit 2 will comprise a ground floor area of 929 sq m and include a mezzanine of 465 sq m, which may be used for storage and/ or trading area, whilst Unit 3 will comprise a ground floor area of 743 sq m, and include a mezzanine of 372 sq m, which may be used for storage and/ or trading area. Servicing of these units will be provided via the existing service road to the rear of the Pets at Home and Halfords units.

The additional floorspace sought within this application (excluding the garden centre) amounts to 1,758 sq m gross. In line with the existing permission attached to the Focus Unit, it is intended that the proposed retail floorspace is restricted to only allow for the sale of Open A1 non food goods (i.e. comparison goods). As detailed in accompanying Retail Impact Assessment there is an identified need for additional comparison goods floorspace within the Rustington/ Littlehampton urban area, which is currently resulting in a significant and unsustainable level of leakage of retail expenditure to surrounding

centres. The proposed size of units will attract retailers who do not and would not otherwise trade from Littlehampton or Rustington, and whose presence will meet both a pent up capacity through expenditure growth, as well as greatly improving expenditure retention within the local catchment area.

In addition to the additional retail floorspace sought by the proposal, the Application seeks alterations to the car park layout, which as well as providing for 20 cycle spaces, promotes both safer and improved pedestrian linkages between all of the non-food retail units as well as Sainsbury's. In addition the proposal introduces a pedestrian and cycle access point to the footpath and cycleway along the northern boundary of the site. The alterations to the car park will reduce the car parking provision from 301 spaces currently, to 240 spaces, of which there will be 12 disabled spaces. In addition the electricity sub-station currently located to the side of the existing Focus unit will be relocated to the north of the car parking area. Whilst landscaping will also be provided within the car park, and to the north of Unit 1, four of the larger lime trees currently situated within the car park will be retained. The tree lined southern boundary of the site will remain unaltered.

5.0 Planning Policy Background

Planning Policy Summary

This section will provide a summary of the main national, regional and local planning policy against which the application is likely to be considered.

5.1 National Planning Policy

PPS1 - General Policy and Principles (February 2005)

PPS1 was published in February 2005 and replaced PPG1. The key message arising from PPS1 is the deliverability of sustainable development. Paragraph 5 states that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:

- "making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;
- contributing to sustainable economic development;
- protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;
- ensuring high quality development through good and inclusive design, and the efficient use of resources; and
- ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community."

The development proposed will contribute towards the objectives set out above and will provide for improved shopping facilities for the residents of the Littlehampton and Rustington area.

Whilst the development proposal are in an out-of-centre location as defined by PPS6 (see below) the site benefits from a regular bus service from the neighbouring Sainsbury's store and the application proposals will seek to improve the store's sustainability by improving pedestrian and cycle access within the site, as well as providing cycle spaces.

Planning Policy Statement 6 – Planning for Town Centres (March 2005)

Planning Policy Statement 6 (PPS6) was published in March 2005 with the key aim of promoting the vitality and viability of town centres which remains a core Government objective. Within the context of this overall aim, PPS6 also seeks to enhance consumer choice; support an efficient competitive and innovative retail sector; and improve accessibility by ensuring that all new development is accessible by a choice of means of transport.

The Government seeks to achieve its core objective of promoting the vitality and viability of town centres by:

- "planning for growth and development of existing centres; and
- promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all. (paragraph 1.3)

Other Government objectives which need to be taken account of in the context of PPS6 include:

- "enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the need of the entire community, and particularly socially excluded groups;
- supporting efficient, competitive and

innovative retail, leisure, tourism and other sectors and improving productivity; and

- improving accessibility, ensuring that existing or new development, is, or will be, accessible and well-served by choice of means of transport.” (paragraph 1.4)

Furthermore, PPS6 states that the following wider policy objectives of the Government are also relevant to the aims of PPS6, insofar as they would not be inconsistent with the key objectives of PPS6. Paragraph 1.5 details these wider objectives as being:

- “to promote social inclusion, ensuring that communities have access to a range of town centre uses, and that deficiency in provision in areas with poor access to facilities are remedied;
- to encourage investment to regenerate deprived areas, creating additional employment opportunities and an improved physical environment;
- to promote economic growth of regional, sub-regional and local economies;
- to deliver more sustainable patterns of development, ensuring that locations are fully exploited through high density mixed use development and promoting sustainable transport choices, including reducing the need to travel and providing alternatives to car use; and
- promote high quality and inclusive design, improve the quality of the public realm and open spaces, protect and enhance the architectural and historic heritage of centres, provide a sense of place and focus for the community and for civic activity and ensure that town centres provide an attractive, accessible and safe environment for businesses, shoppers and residents.”

By enhancing the retail provision at Rustington Retail Park, the proposed development responds positively to these key objectives set out in PPS6, by providing greater retail choice within the local area, and

delivering a more sustainable pattern of development.

The guidance states that it is not the role of the planning system to restrict competition, preserve existing commercial interests or to prevent innovation (paragraph 1.7).

The main town centre uses to which PPS6 applies are as follows: retail; leisure; entertainment facilities and more intensive sport and recreation facilities; offices (commercial and public); and arts, culture and tourism (paragraph 1.8).

PPS6 identifies a number of considerations which should be taken into account when determining planning applications. In this respect, PPS6 draws an important distinction between development in town centres (defined in the footnote on page 5 of PPS6 as including district and local centres), which is encouraged, and development outside existing centres (edge-of-centre and out-of-centre sites).

PPS6 specifies the following key considerations in assessing planning applications for retail development at Paragraph 3.4:

- the need for the development;
- that the development is of an appropriate scale;
- that there are no more central sites for the development;
- that there are no unacceptable impacts on existing centres; and
- the locations are accessible.

The principal test in PPS6 for determining new retail developments is whether a ‘need’ for the proposal has been identified.

Paragraph 3.13 of PPS6 states that the sequential approach to site selection should be applied to all development proposals for sites that are not in an existing centre, nor allocated in an up to date development plan document. As the application site is located in an out-of-centre location, we have undertaken a sequential site assessment.

In respect of scale, PPS6 states that the scale of development should relate to the role and function of the centre within the wider hierarchy and the catchment served. PPS6 states that the aim should be to locate the appropriate type and scale of development in the right type of centre, to ensure that it fits into that centre and complements its role and function. Although not located within the defined Rustington and Littlehampton Centres, the proposed development is considered to be of an appropriate size and scale in relation to the centre.

Paragraph 3.20 of PPS6 states that impact assessments should be undertaken for any application for a main town centre use which would be in an edge-of-centre or out-of-centre location and which is not in accordance with an up to date development plan strategy. The Retail Impact Assessment submitted in support of this application contains a thorough assessment of the PPS6 tests.

In summary, the proposed development fully accords with the guidance set out in PPS6, given that there is a proven quantitative need, there are no sequentially preferable sites suitable, available or viable to accommodate the subject proposals, the proposal will not materially impact surrounding centres, and is of a suitable scale to the role and function of those surrounding centres. It is also considered that the proposal will enhance the local retail offer, and improve the retention of expenditure locally, reducing leakage as well as the distance travelled to surrounding larger centres.

PPG13 - Transport (March 2001)

PPG13 recognises that the quality of our lives depends on transport and easy access to jobs, shopping, leisure facilities and services; and the need to provide a safe, efficient and integrated transport system to support a strong and prosperous economy.

Paragraph 4 of PPG13 identifies three key objectives. It states:

- **"The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to:**
- **promote more sustainable transport choices for both people and for moving freight;**
- **promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and**
- **reduce the need to travel, especially by car."**

Paragraph 35 states that policies for retail and leisure facilities should seek to promote the vitality and viability of existing town centres, which should be the preferred locations for new retail and leisure developments.

The Transport Assessment submitted with this application provides a full assessment of the issues raised within PPG13.

5.2 Regional and Local Planning Policy

Regional Planning Guidance for the South East (March 2001)

Regional Planning Guidance for the South East (RPG9) through Policy Q5 states that:

"The Region's existing network of larger town centres should be the focus for major retail, leisure and office developments, to support an urban renaissance, promote social inclusion and encourage more sustainable patterns of development."

The policy also states that in preparing development plans, local authorities should apply the sequential approach set out in PPG6 to identify sites for retail, leisure and office development. Local

authorities should avoid extending existing edge-of-centre and out-of-centre development while more central options exist. In the context of this, whilst the Application Site is located in an out-of-centre location, we consider it likely to form links with the Littlehampton and Rustington Centres, and will encourage more sustainable patterns of development, through shorter trip lengths.

The South East Plan (Draft March 2006)

The South East Plan will replace RPG9 and will provide a regional planning framework to 2026. Government approval of the final plan is expected in 2008, following the Examination in Public.

Section D9 deals with town centres and states that the focus of the policies is to distribute growth to middle and lower order centres not overly dominated by the largest centres. Local centres are likely to be a focal point for some but not necessarily all development and should develop their distinctive features and nature (paragraph 1.5). Paragraph 1.5, states that the focus of the policies within the plan is:

“to distribute growth to middle and lower order centres supporting a balanced network of centres not overly dominated by the largest centres.”

Policy TC1 refers to the importance of accessible, attractive and vibrant town centres to sustainable development, and that they will continue to be a focal point for a mixture of uses, including leisure, services, retail, residential and commercial.

Policy TC2 sets out the strategic network of town centres, whereby the nearest named centre, Worthing is defined as a Primary Regional Centre, but also makes reference to smaller centres such as Littlehampton and Rustington:

“There are many other centres within the region that meet local needs. Local Development Documents should identify and develop policies for centres within their areas”.

It also sets out that network of town centres will be the focus for major retail developments (10,000 sq m gross, or 10ha).

Policy TC3 refers to new development and redevelopment in town centres and is not therefore applicable in this instance. Policy TC4 (Creating and Supporting Town Centres) states that no need has been identified for further out-of-centre regional or sub regional shopping centres, or large scale extensions to existing centres up to 2026. It sets out that the role and regeneration of town centres should not be undermined by the intensification of out-of-centre development. It also acknowledges that LPAs should apply the sequential approach to site selection, and that in exceptional cases where there are no sequentially preferable sites, upgrading an existing out-of-centre site could be considered.

Policy CC8a refers to an urban focus, and states that the prime focus for development in the South East should be urban areas, in order to foster accessibility to employment, housing, retail and other services, and avoid unnecessary travel. It further states that :

“Local planning authorities should formulate policies to:
i) Concentrate development within the region's urban areas
ii) Seek to achieve at least 60% of all new development in the South East on previously developed land and through conversions of existing buildings
iii) Ensure that developments in and around urban areas, including urban infill/intensification and new urban extensions are well designed and consistent with the principles of urban renaissance and sustainable development.....”

Policy CC12 refers to the character of the environment and quality of life. It states that:

"actions and decisions associated with development and the use of land should actively encourage the conservation, and where appropriate the enhancement of the character, distinctiveness, and sense of place of settlements and landscapes throughout the region. Opportunities for creating a high quality environment should be sought based on a shared vision that places emphasis on good design, innovation, sustainability and achieving a high quality of life".

The South East Plan Panel Report

Following the Examination in Public, the Panel Report was published in August 2007. The Panel recommend various amendments to the above policies, including amending Policy TC3 (Recommendation 14.5) so that it provides the core guidance on implementing Policy TC2 and to emphasise the importance of inter-relationships between centres within and outside the region.

Recommendation 14.6 sets out that Policy TC4 should be amended so that it deals solely with out-of-centre regional/sub-regional shopping centres, making clear that no need is identified for any further or large scale extensions to, such centres.

It also proposes deletion of the second and third paragraphs, but that reference to the benefits of town centre management partnerships, and the mechanisms for strengthening the wider role of town centres in the supporting text to either TC1 or TC3, be included.

West Sussex, Structure Plan 2001 - 2016

The West Sussex Structure Plan was adopted in February 2005. Policy LOC1 relates to locational strategy, and states that the priority in

West Sussex is to locate new development within towns and villages particularly through the reuse of previously developed land, and therefore development within built-up area boundaries should be permitted provided that the impact on the character of the area and the environment, resources and assets of the County is acceptable. In respect of retail development, Policy NE9 relating to town, village, district and neighbourhood centres has not been saved. Policy NE10 relating to retail development has been saved and states:

(a) Retail development which cannot be accommodated within the existing town, village, district and neighbourhood centres should not be permitted unless it meets identified need and does not undermine the vitality, viability and retail function of the centres. Local shops should be permitted where they meet the identified needs of local communities.

(b) Local plans will include policies to:

(1) ensure that new or improved retail development outside the centres:

(i) complements existing shopping on offer by providing a range and type of facilities which cannot be accommodated within an existing centre following the adoption of a sequential approach to site selection;

(ii) is of a scale and nature no greater than that required to meet any identified need;

(iii) does not adversely affect the vitality and viability of any nearby centre as a whole, either as an individual development or cumulatively with similar existing or proposed developments; and

(iv) offers realistic, safe and easy access by a range of transport modes, not exclusively by car.

(2) where appropriate, allocate suitable sites or areas for additional retail development taking into account the locational strategy in Policy LOC1 including provision as part of mixed-use development at the Strategic Locations; and

(3) secure the retention of local shops and enable the provision of new local shops.

The Structure Plan advises that local plan policy should ensure that new or improved retail development outside the centres complements existing retail provision by providing a range of facilities which cannot be accommodated within a city centre. Furthermore, the development must be of a scale and nature no greater than that required to meet any identified need and not adversely affect the vitality and viability of any nearby centres as a whole. In addition the development must offer a realistic, safe and easy access by a range of transport modes.

The Structure Plan states that out-of-centre development is not necessarily ruled out, rather the emphasis is on town development as a whole and the way in which such out-of-centre proposals can in some cases increase the total local retail base. The plan recognises that this can help to prevent leakage of expenditure to towns further away.

The Application proposal complies with the above policy, as they meet an identified need, which cannot be accommodated within a town centre location.

Arun District Local Plan

Policy GEN2 refers to the location of development within the built-up area boundary within which the Application Site is located, and states that development or redevelopment will be permitted within the built-

up area boundaries subject to other policies in this plan.

Policy GEN7 refers to the form of new development, which states that planning permission will only be granted for schemes displaying high quality design and layout. We consider that the documentation submitted in support of the subject application provides sufficient evidence of the proposals compliance with this policy.

Policy GEN12 refers to parking in new development, stating 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. Given that the proposal seeks an overall reduction in car parking provision, which brings the car parking spaces well within the limits of the Adopted Local Plan, we consider that the proposal adheres to this policy.

In respect of retail development, the Local Plan contains several policies relevant to the proposed development. Policy DEV26 (Criteria for Retail Development) states:

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

- (i) it is of a high standard of design, materials and layout, and has due regard to the character of the site and its surroundings;**
- (ii) 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.**

Applications for A3 uses will need to be accompanied by details of the provisions for the extraction of fumes and

cooking odours and the provision of areas for the collection of waste."

Policy DEV27 (Retail Development Outside the Principal Shopping Areas) states:

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

- (i) the proposal does not adversely affect the vitality and viability of the Principal Shopping Areas and local shopping areas, either as an individual development or cumulatively with similar existing or proposed developments;
- (ii) it is easily accessible by the highway network and 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.

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 sites will need to demonstrate that no suitable site can be found, firstly within the existing town centre or, secondly, on the edge of the centre.

Applicants will also be required to demonstrate that there is a need for additional facilities.

Where these 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 units' size to a minimum of 1,000 m² (10,764 ft²) with no further sub-division allowed."

Local Development Scheme

It is understood that the Council has had to withdraw its approved Local Development Scheme as it can no longer follow the timetables set out,

as consultation on the Core Strategy Preferred Options Document has been postponed.

Summary

In summary it is clear that the Application Proposal fully accords with prevailing policy at all levels.

6.0 Design Principles

6.1 Consultation

To inform the preparation of the development proposals, consultation has taken place with Planning Officers at Arun District Council, to inform issues such as layout, access, and architectural style and detailing.

Both the design and layout of the proposal received a positive response and it was considered that the proposed design would be complementary to the future car showroom development to the west of Mill Lane. The Planning Officer did request that the proposal be tested against PPS6 criteria and this is dealt with in the Retail Impact Assessment which accompanies the application.

6.2 Design development

This section examines the potential ways of re-developing the retail park, giving consideration to both the site context, the identified opportunities and constraints, as well as prevailing planning policy.

Figure 6.1: Existing Site Layout

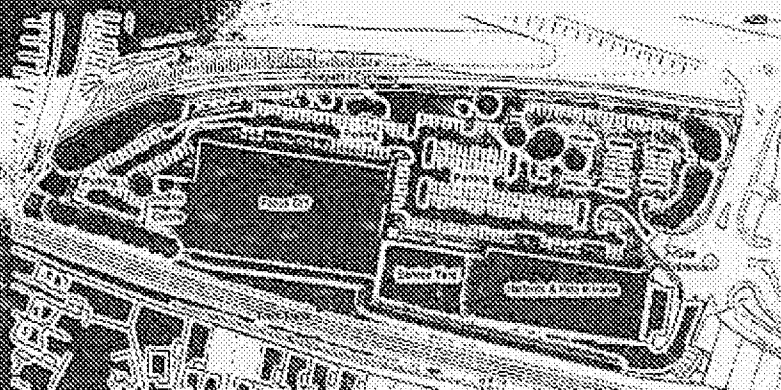
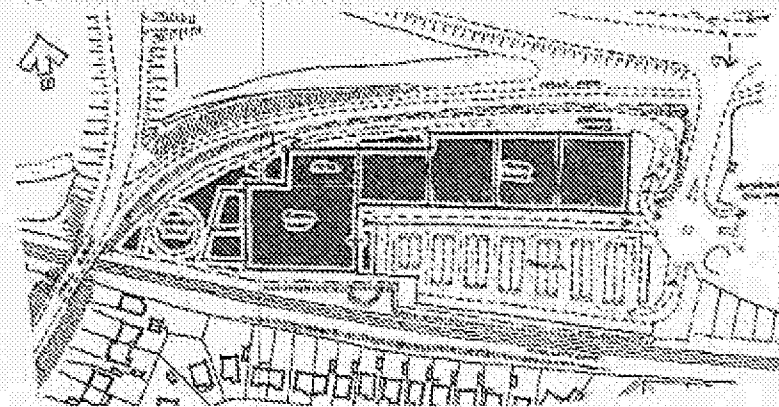


Figure 6.2: Scheme 1 (cleared site)

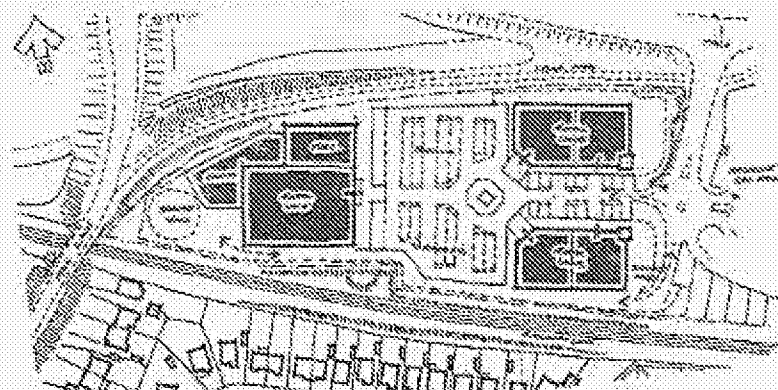


During the evolution of the design, several revised layouts have been considered.

This scheme looks at remodelling the whole site, including Pets at home and Halfords and flipping the position of the retail units. Although a radical option, this layout uses the topography of the site to mask the bulk of the buildings. Notable this is the case in the north west corner where the landscaped slope north of the site hides all views from the A259.

This layout also has the advantage of having a better orientation – enjoying sunlight on the buildings façade for most of the day. However, this layout is considered very insular, with the rear of the units and service yard abutting the footpath and cycleway, and this scheme does not improve pedestrian or cycle access to the site.

Figure 6.3: Scheme 2 (cleared site)



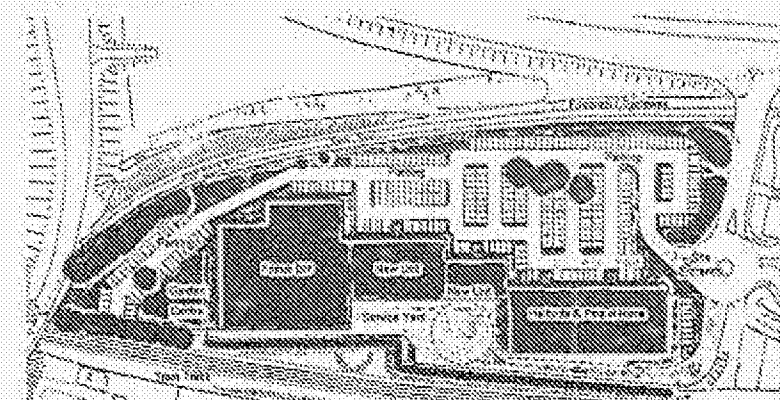
This last option also looks at remodelling the entire site.

The largest unit is placed at the Western side of the site and effectively acts as a magnet into the park.

The two other buildings then act as 'gateway' buildings that would welcome people into the site.

Whilst this layout could improve pedestrian access to the footpath and cycleway, linkages to the adjoining Sainsbury's unit are possibly worsened, due to the necessary servicing arrangements of the two units to the east of the site.

Figure 6.4: Scheme 3



Scheme 3 looks at substantially remodelling the existing DIY store while retaining the position of the existing service yard and turning circle. The space between the existing units allows for the addition of two new retail stores.

It is considered that the scheme is successful in that the DIY store's entrance would now face the majority of the parking, removing the view of the blank elevation when entering Retail Park. The scheme also incorporates a realignment of the car park entrance, in an attempt to improve the distribution of cars across the car park, as well as improving the visibility of the non food retail units, when travelling into the site.

We do not consider that this solution has tackled all the problems with the existing layout, notably the isolation of the parking to the western side are worsened by relocating the entrance to the east of the DIY store. The stepped flank elevations of the new units are also awkward and noticeable from the main approach into the site. Furthermore the scheme does not consider improved the linkages with the adjoining Sainsbury's.

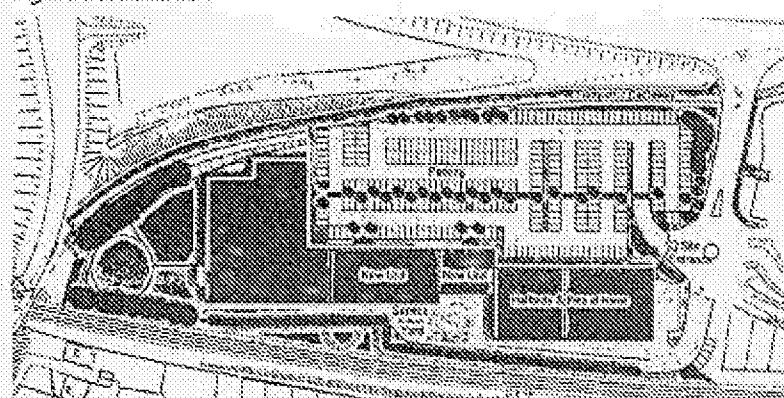
Scheme 4 goes one step further than the last in that it looks at the demolition (rather than substantial remodelling) of the existing DIY store. This allows freedom in the design to relocate the turning circle and associated service yard to the awkward west corner of the site.

The relocation of the service yard allows all of the parking to be provided to the front of the store entrances and allows greater rationalisation of the layout of the two new infill stores.

This scheme also introduces greater permeability of the site to pedestrians, and provides better linkages with the adjoining Sainsbury's.

Given the appropriateness of this scheme in dealing with the constraints and opportunities identified, it is this scheme that has formed the basis for the subject proposal, as detailed in the following sub-section.

Figure 6.5: Scheme 4



6.3 Proposed Design

The design philosophy is based upon careful consideration of the constraints and opportunities of this individual site in Rustington.

The proposed scheme looks to redevelop the site, with an aim to-

Improve the legibility of the layout

As described within the 'Site & Area Appraisal' portion of this document, the existing site appears to lack cohesion. Numerous options have been investigated to overcome these issues, some of which have been displayed within the last section.

The proposed solution involves the complete demolition of the existing Focus store. Although an expensive option, it was considered this bold move was necessary in order to resolve the inherent weaknesses in the existing layout.

Rebuilding the Focus store and relocating the service yard to the west successfully 'realigned' this building so that the rear was hidden, while the entrance fronted customers as they approached the site. This new layout also allowed the parking to be positioned to the front of the store, and removed the existing undesirable parking area situated to the west of the existing store.

The relocation of the main turning circle and the service yard to the Focus store, from the centre of the site to the west, allowed for additional retail units between the existing stores. This allows for a continuous shopping facade, with parking in front. It also completely hides the service yard which is now situated to the rear of the units.

These points are illustrated in the following drawing.

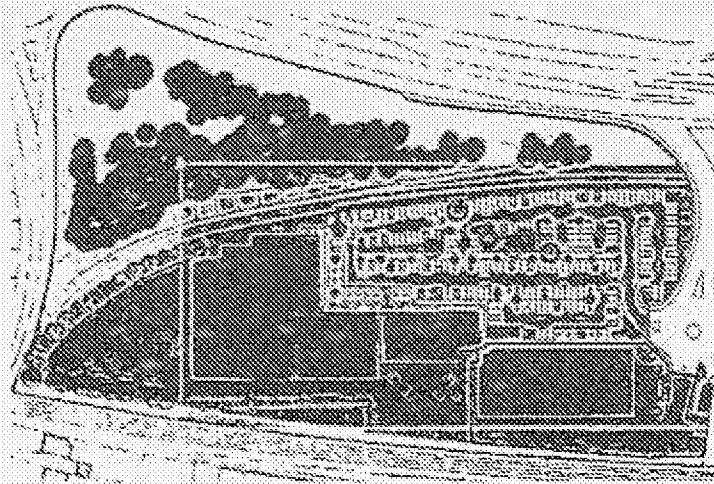


Figure 6.6

To improve the layout of the site, it was also felt important to set up a hierarchy within the units. This was achieved by reinforcing the importance of the Focus store by its prominent position making it clearly visible from the site entrance.

Create high quality design

With the demolition and subsequent rebuilding of the existing Focus store, and the erection of two new stores, it was clear that a substantial amount of development will be taking place on the site. It is imperative that these new buildings integrate suitably with the stores that will remain. In addition the design of the new buildings should be of a high quality design.

This was achieved in a number of ways, including:

A) Selection of suitable, high quality materials

The materials were chosen after studying both the existing stores, and also local precedents.

The chosen materials are of good quality and will last many years with minimum maintenance. They are also suitable to be used as part of a retail development.

B) Increase legibility

Rationalising the layout of the units has created a continuous shopping façade. This has greatly increased the parks legibility in that there is a defined separation between the customers and service vehicles.

Signage and entrance towers have also been incorporated into the design of the facades to help better orientate new customers to the site. A new feature tower has also been incorporated to the north of the Focus store. This feature will act as a signage beacon that will form a 'book end' to the shopping façade. It also mirrors the more traditional 'church spire' type book end situated on the façade of the existing store.

C) Create a human scale

The heights of the proposed stores were dictated by both the heights of the existing stores and also by the inclusion of mezzanine levels. Signage towers have also been incorporated within the facades to increase the legibility of the scheme when viewed from afar. These elements are crucial to allow new customers to effectively orientate themselves with the development.

Although these elements work well when viewed from afar, additional details should be included to add interest when customers are close to the buildings so that they are not over powered by the scale.

This has been achieved within the proposals by the inclusion of a canopy that runs along the length of the façade. Subtle detailing has also been considered around entrances and within the brick 'transition' unit situated between the existing and proposed stores.

Rationalise the car parking

Although greatly improving the legibility of the buildings, the proposed alteration to the units reduced the number of parking spaces that were achievable on the site. This was not considered an issue as the number of proposed parking spaces are considered appropriate for the amount of retail proposed. However it was felt that this was an opportunity to reassess the layout of the parking with an aim of improving links / landscaping.

The result is an area of parking that:

- is situated in front of the retail stores
- allows for formal pathways and links
- allows for formal areas of landscaping to be planted

Another key constraint that we considered important to work within was the retention of the existing mature Lime trees on the site. A photograph of these is shown below.

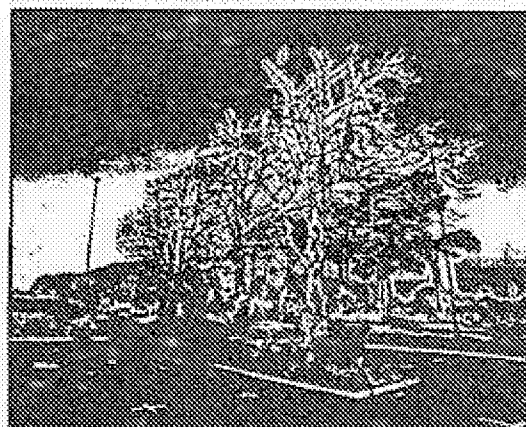


Figure 6.7

In addition to preserving these, we have included additional landscaping in this area which provides an attractive surround to the proposed pedestrian link.

Improve links

As seen within the Site and Area Appraisal, desire lines exist between the site and the adjacent Sainsbury's store. With the redevelopment, formal walkways have been designed that link the Sainsbury's store with this site.

Links have also been strengthened with the existing walkway / cycleway that runs to the north of the site. A ramped link has been positioned close to the entrance of the Focus store. It is hoped that these initiatives, together with the addition of cycle parking on site, will encourage people to both walk and cycle to the stores.

The proposed building has also been linked with the existing by the addition of a glazed canopy. This canopy is continuous around the front of both the existing and proposed units.

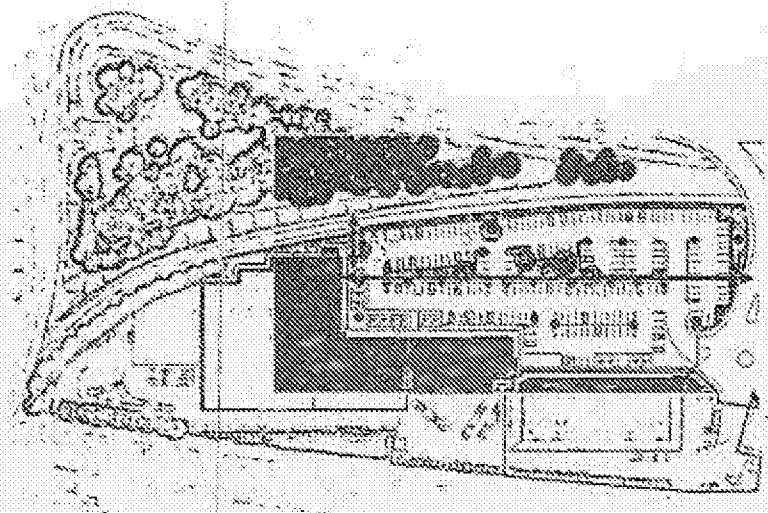


Figure 6.8

6.4 Scheme Visuals

Computer Generated images illustrating the proposed stores and their relation to the existing Pets at Home and Halfords store.

Figure 6.9: Keyplan

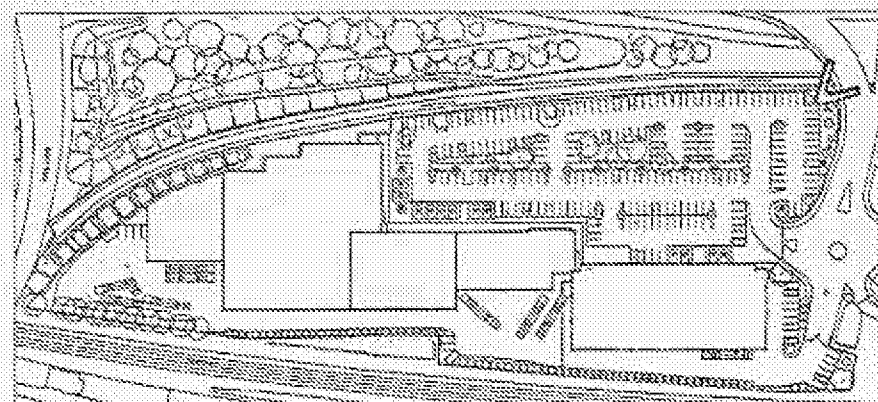


Figure 6.10:



Figure 8.11:

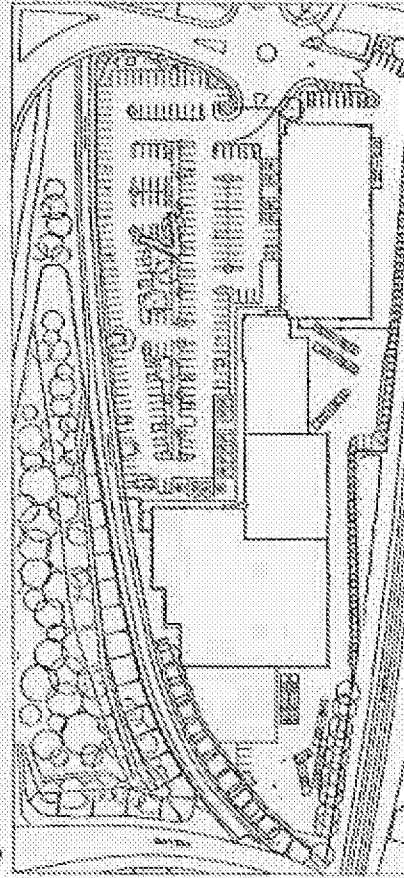


Figure 5.12:



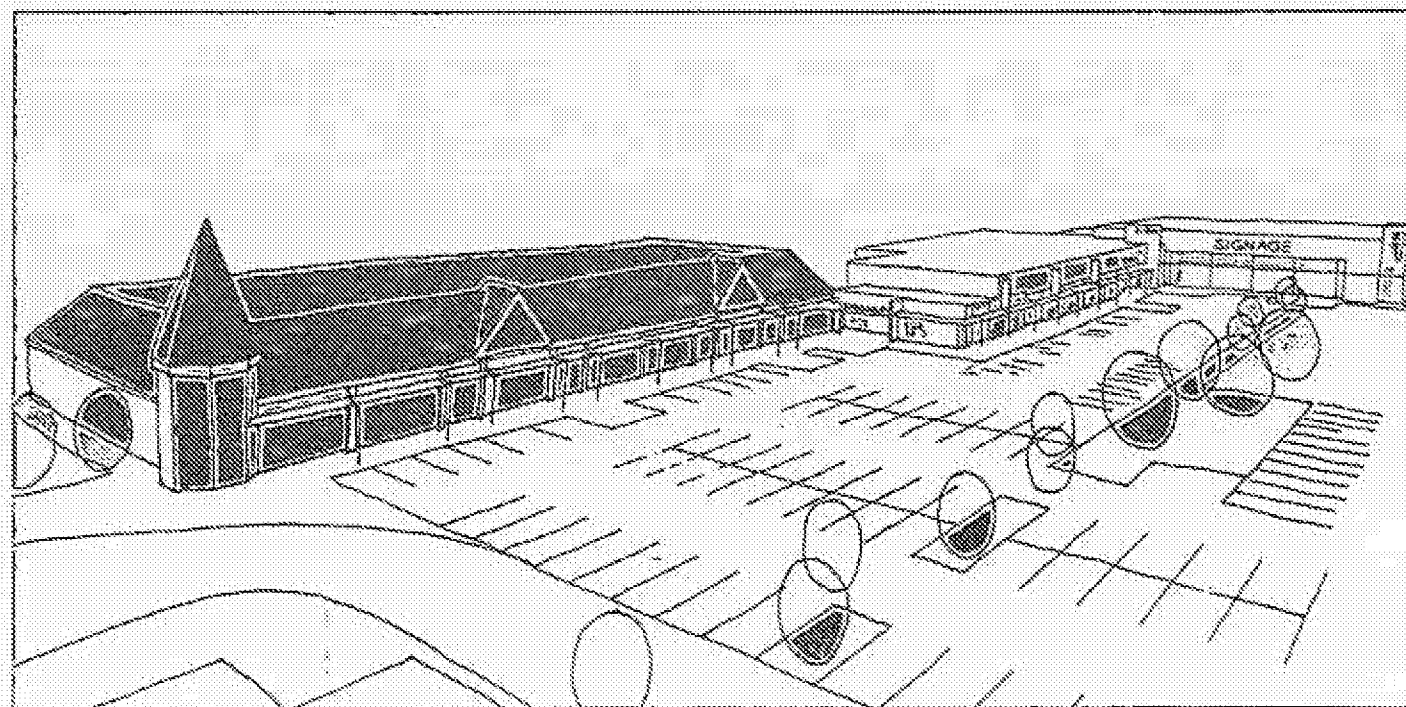
6.5 Proposed future of the site

The proposed development looks at unifying the existing and proposed buildings by both carefully analysing the building layout / scale and by introducing a new canopy.

A feature tower has also been introduced into the façade of the Focus store. It is the intention that this will act as a 'book end' to the development and mirror the tower associated with the existing stores.

This can be seen from the overview sketch below:

Figure 6.13



It is the intention that in future the existing store will remain, but be re-clad with materials more suited to those proposed within this application. The signage tower, which at present is weak, uninviting and reminiscent of a church spire, will be removed and replaced with a modern example similar in nature to the one proposed for the Focus store.

This can be seen by the future phased sketches below:

Figure 6.14

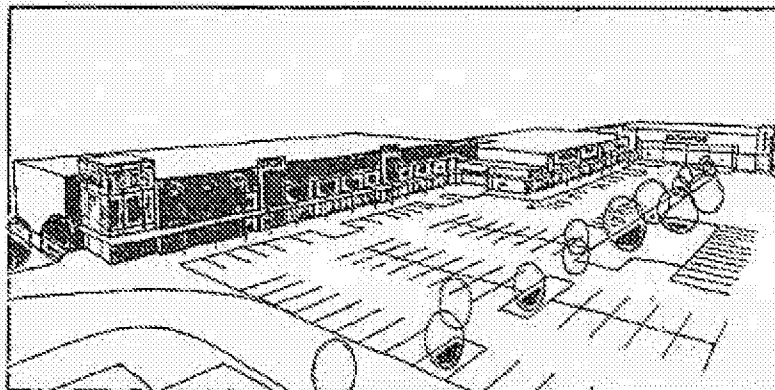
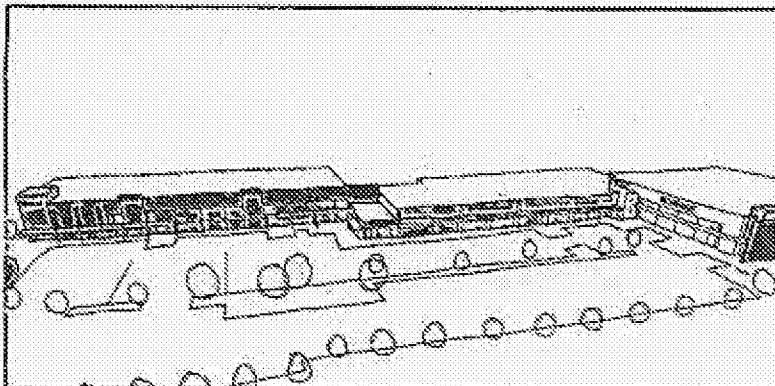
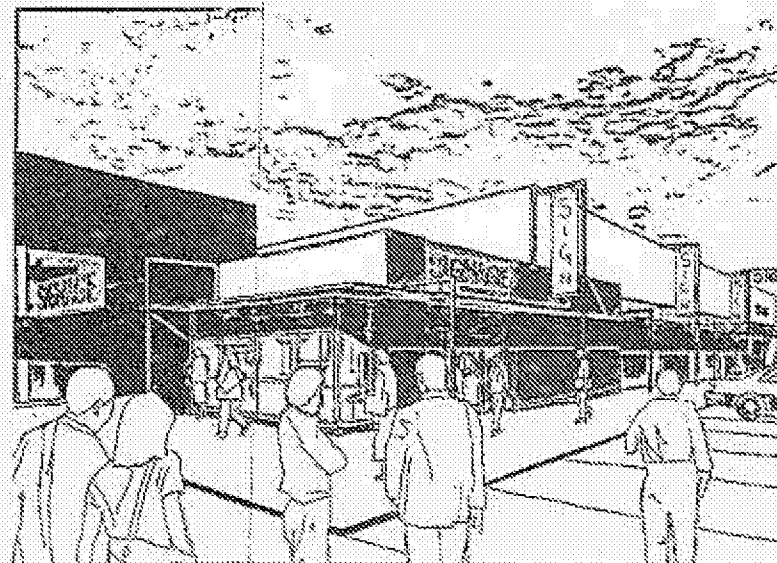


Figure 6.15



It is the intention that the existing buildings will be re-clad in a similar palette of materials as that proposed within this application. In addition, similar elements such as the vertical signage totems and timber entrance indicators will be employed. These elements within the existing development can be seen in the sketch below:

Figure 6.16



7.0 Design and Access Considerations

7.1 Use

It is proposed that the Application Site will comprise three retail units as well as an ancillary Garden Centre. Part of the Application Site currently comprises the existing Open A1 non food retail unit (occupied by Focus DIY) with associated garden centre, all of which will be demolished to allow for the construction of the three aforementioned units. All three units are intended to be occupied by Open A1 non food (comparison goods) retailers, which mirrors the existing planning permission of the Focus unit, as well as the neighbouring Pets at Home and Halfords units.

Rustington Retail Park is an established retail destination for both food and non food retail provision. The Application proposal will improve the non food retail provision on the Retail Park, and will assist in meeting an identified need for comparison goods floorspace which cannot be met elsewhere within the surrounding centres. Further information in this respect is contained in the Retail Impact Assessment which accompanies the application submission.

7.2 Amount

The Application proposal seeks the demolition of the existing Focus Unit (3,253 sq m ground floor area), and the construction of three new retail units, totalling a ground floor area of 4,181 sq m. Therefore, the additional ground floor area sought by the proposal totals 928 sq m.

In respect of each of the proposed units, Unit 1 will comprise a gross area of 2,508 sq m, plus a mezzanine of 111 sq m for staff/ office use, whilst Units 2 and 3 will comprise a ground floor area of 929 sq m and 743 sq m respectively, and both will include mezzanine floor cover totalling 465 sq m gross within Unit 2 and 372 sq m within Unit 3. The proposal also seeks the relocation and enlargement of the existing garden centre currently attached to the existing Focus unit.

Individually, the proposed units are of a similar scale to the remaining non food retail units contained within Rustington Retail Park, whilst also being smaller than the existing Focus Unit.

Policy justification relating to the quantum of additional retail floorspace sought by the Application proposal is contained within the accompanying Retail Impact Assessment.

7.3 Layout

The layout for the scheme has been informed by a number of factors, these include:

The desire to create a continuous retail frontage

This was one of the main aims when designing the layout of the units. By achieving this, the 'front' - i.e. the façade that the visitors to the park see, is separated from the 'back' where unloading of goods is undertaken.

This is a solid design principle that greatly improves the legibility and therefore success of the retail park.

Rationalisation of the car parking

For reasons similar to those set out above, it was decided that all of the parking allocated for customers to the park should be located to the front of the store.

The position of access into the site

The existing access to the site works well, and due to the topography and close proximity of a railway track, it was never a realistic option to alter this.

The existing service route

The existing service route works well at present, in that it allows service vehicles to unload goods in a largely discrete manner, i.e. behind the retail units. This arrangement is improved within the proposals by achieving a continuous building frontage, totally hiding the service zone behind the retail units.

The siting of existing units which are to remain

The proposed layout was developed so as to retain the existing Halfords and Pets at Home units.

The location of mature trees

The proposed car parking layout was chosen so that the existing mature trees are retained.

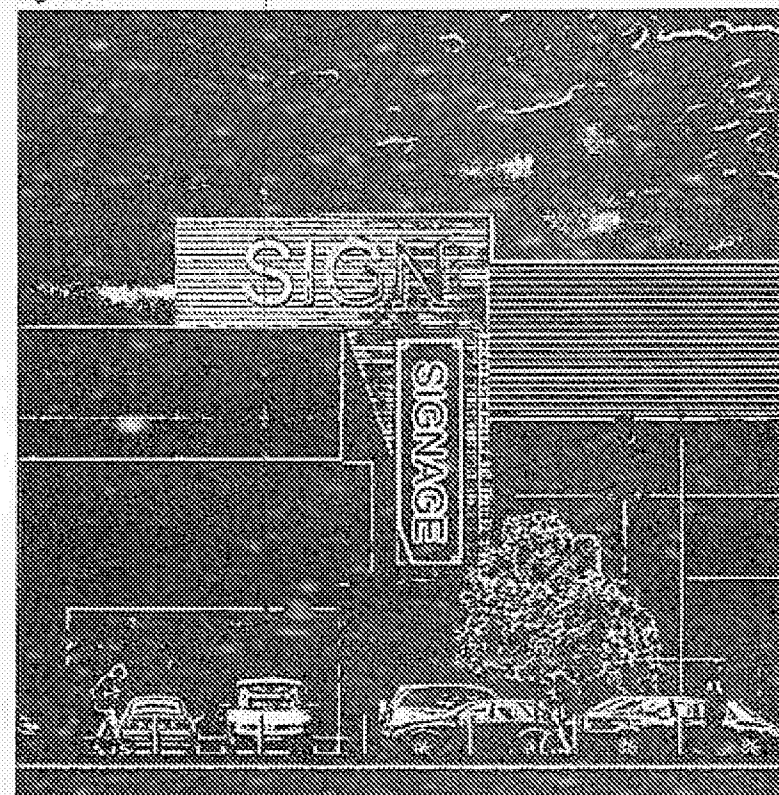
7.4 Scale

The scale of the proposed buildings has been informed predominantly by the heights of the existing buildings that are to remain. These heights are considered appropriate for the proposed uses, and do not detract from the visual amenity of any neighbouring domestic properties. They also allow adequate space for mezzanine levels within the proposed stores.

To add additional interest, there are three differing heights which have been set up within the proposed buildings. These help to articulate the different stores, and have been further reinforced by the use of separate materials (please refer to the 'Appearance' heading of this section for further details).

This can be seen in the following computer generated image:

Figure 7.1



This approach also sets up a hierarchy in the building forms ranging from the low brick transition element to the largest store being reserved for the 'Magnet store' (the Focus unit).

7.5 Landscaping

With the exception of the 4 mature Lime trees situated within the car park, the existing vegetation on the site is of limited environmental and aesthetic value.

The proposals have looked to address this by highlighting areas where trees and hedges could be located. Perhaps the best example of this is in the reinforcement of the pedestrian walkway with trees and planting.

A detailed landscaping proposal will be commissioned upon a favourable planning decision; it is therefore anticipated that this will form a planning condition attached to the consent.

7.6 Appearance

Although finished in 1996, the architectural styling of the façade to the existing store is reminiscent of a retail style prominent in the 1980s. This dated approach attempts to emulate much smaller, domestic properties with an approach to appear more human in scale. This is probably best seen by the use of a tiled roof that would not look out of place on a house.

This approach has also been employed locally in the town centre, most notably the Somerfield Store, and also with greater success in the neighbouring Sainsbury's store.

Although it would have been an easier approach, it was felt that the proposed buildings should appear more 'honest' and reflect the fact that they are retail units and not domestic dwellings or town halls. The result is an architectural style of this time which is legible and articulate, but through features and subtle detailing relates to the human scale.

The materials chosen have also been carefully considered, and a limited pallet has been chosen. These high quality materials reflect the nature of the buildings.

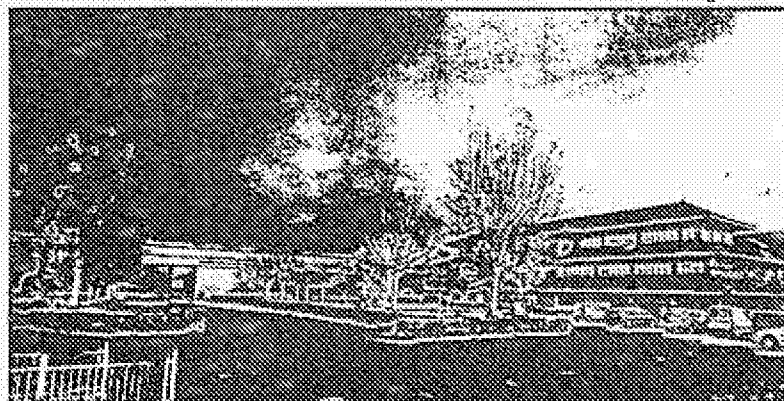
Proposed materials:

External Walls	- Architectural profile metal cladding - Flat metal composite cladding panels - Facing brickwork - Timber cladding
Windows	- Extruded aluminium curtain glazing
Roofing	- Single ply roofing membrane
Accessway	- PCC Block Paving
Parking Area	- Tarmacadam

(For greater information regarding the position of the materials listed, please refer to HGP's elevations).

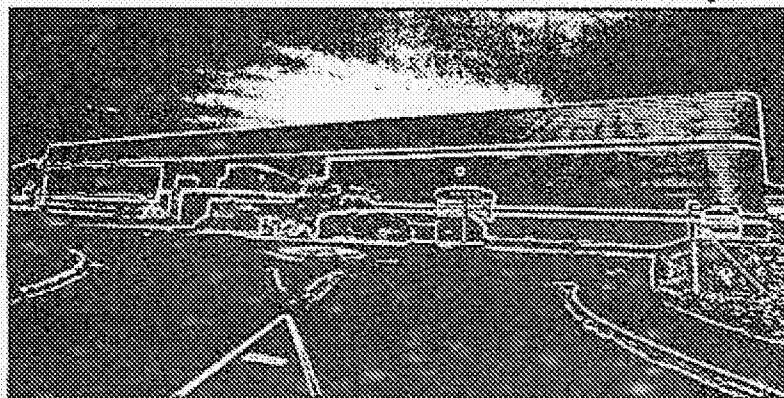
This approach can also be seen in two local precedents:

Figure 7.2



The headquarters to the Body Shop. Architectural profile metal cladding has been used extensively on many of the buildings on the site.

Figure 7.3



The Wick Site Industrial Park.

Within our proposals, this material is proposed to clad the new Focus store.

7.7 Access

For detailed information relating to the existing and proposed movement to and around the site, please refer to the Traffic Assessment prepared by Russell Giles Partnership (RGP), which accompanies this planning submission.

With regard to access within the site, being a retail unit open to members of the public, the proposed building has been designed to be practical for people who are less able. External examples of this include using materials that are suitable for wheelchair users, such as block paving. Internal examples include the provision of a lift, together with large staircases.

The proposed buildings will also comply with the relevant Building Regulations / British Standards.

8.0 Other Technical Documents

8.1 Retail Impact Assessment – Barton Willmore

The accompanying Retail Impact Assessment (RIA) demonstrates that the Application proposals fully accord with National, Regional and Development Plan policy.

A vitality and viability audit has been carried out for Littlehampton and Rustington Centres which conclude that both centres display goods signs of vitality and viability, with low vacancy rates. The household survey accompanying the Coastal Districts Retail Study highlights a significant amount of leakage of comparison goods expenditure to surrounding larger towns.

The RIA finds that there is a clear quantitative and qualitative need for the additional comparison goods floorspace proposed. Furthermore the RIA incorporates a sequential site assessment which assesses alternative more centrally located sites within both Littlehampton and Rustington. However, no sites were identified which were available, suitable, or viable.

The Application Proposals have also been assessed in terms of their potential retail impact using the criteria set out in PP56. The impact assessment demonstrates that the proposals will not materially affect the vitality and viability of either Littlehampton or Rustington Centres, or indeed any other defined centres. Furthermore, it is considered that with the potential clawback in expenditure from the surrounding centres, then this could have a positive impact on Littlehampton Town Centre and will assist in reducing the current leakage of trade to larger centres.

The RIA also assesses the appropriate scale of the proposal. Given that the proposal only seeks to address the anticipated level of under provision in comparison goods floorspace within the local area and the high level of leakage to surrounding towns it is considered to be of an entirely appropriate scale.

8.2 Transport Assessment – Russell Giles Partnership (RGP)

The accompanying Transport Assessment (TA), assesses the transport implications of the proposed additional retail units within the Application Site. The detailed capacity assessment contained within the TA also considers upgrading of the existing junction of the access road with the A259, which it is understood have been budgeted by WSCC for 2008/09.

The TA concludes that, based on the modelling assessment of the junction, there are no development related capacity or safety issues on the A259.

The TA also concludes that the application site's location provides a wide range of travel alternatives for staff and customers. Furthermore, the implementation of the proposed signalised junction, with controlled pedestrian crossing facilities and cycle parking facilities proposed on site, would further enhance accessibility by non-car modes.

8.3 Flood Risk Assessment – GTA Civils Ltd

The accompanying Flood Risk Assessment & Surface Water Drainage Strategy Report finds that the site is outside the 1% annual probability tidal floodplain, as indicated by the Environment Agency. Additional soakaways have been designed to accommodate the flows in the event of a 1 in 100 year storm. Therefore, there would be no increase in flooding risk to neighbouring properties from the proposed development.

9.0 Summary

This Planning, Design and Access Statement accompanies, and is in support of the full planning application for the refurbishment of the western part of Rustington Retail Park. The Application Site comprises an area of 1.6 ha and encompasses the existing Focus Unit and garden centre located on Rustington Retail Park, as well as the associated car parking and servicing area.

This statement sets out the planning policy context for the development proposal, along with an analysis of the site and surrounding area, including the design principles.

The development as proposed seeks to provide for the retail needs of local residents, whilst also improving the layout and appearance of the retail units, the linkages between units, as well as pedestrian and cycle access (internally and externally).

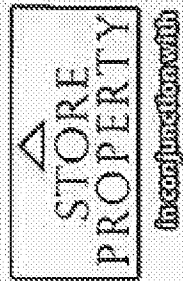
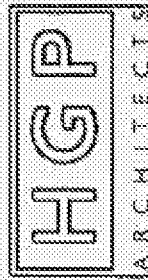
This statement sets out the perceived planning, design and access principles which should apply to the scheme proposals, and seeks to demonstrate how the design has taken account of the local context.

The design solution has sought to integrate the retail units, and improve pedestrian permeability across the Retail Park. It is considered that as well as providing a design that maximises the opportunities and minimises the constraints of the site, the proposal also fully complies with Planning Policy and on this basis should be approved.

Prepared by

**BARTON
WILLMORE**

on behalf of



16225 Rushington Retail Park - Planning, Design and Access Statement

February 2008

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PLANNING APPLICATION REPORT**REF NO:** R/72/08/**LOCATION:** Land At Rustington Retail Park
New Road
Rustington**PROPOSAL:** Alterations to Rustington Retail Park to incl. the demolition of the existing Focus Unit (& associated garden centre), relocation of electricity sub-station, construction of 3 retail units (including garden centre), alterations to car park & associated landscaping alterations**SITE AND SURROUNDINGS****DESCRIPTION OF APPLICATION**

The Application proposals comprise the demolition of the existing Focus Unit (3,253 sq m ground floor area), relocation of electricity substation, and the construction of three new retail units, totalling a ground floor area of 4,181 sq m. Unit 1 will comprise a gross area of 2,508 sq. m., plus a mezzanine of 1.11sq. m. for staff/office use, whilst Units 2 and 3 will comprise a ground floor area of 929 sq. m. and 743 sq. m. respectively, and both will include mezzanine floor cover totalling 465 sq. m. gross within Unit 2 and 372 sq. m. within Unit 3. The proposal also seeks the relocation and enlargement of the existing garden centre currently attached to the existing Focus unit.

In addition it is proposed to reconfigure the existing car parking layout, to provide for a total of 240 car parking spaces, of which 12 will be disabled parking bays. The reconfigured layout will also allow for 20 cycle bays, as well as a pedestrian walkway, and crossing points. It is also proposed to create a pedestrian access point at the north of the Retail Park, allowing access part way along the adjoining footpath and cycleway.

SITE AREA	1.6 hectare.
RESIDENTIAL DEVELOPMENT DENSITY (NET)	N/A
TOPOGRAPHY	Predominantly flat, although at a lower level than the road.
TREES	None of any significance affected by the proposed development.
BOUNDARY TREATMENT	Trees and shrubs to three sides.
SITE CHARACTERISTICS	Existing DIY Store and Garden Centre comprising the western part of the Rustington Retail Park. A railway line exists to the south and the entire southern boundary benefits

from tree cover. A Halfords and Pets at Home Unit abut the application site to the east whilst a Sainsbury's foodstore with associated car parking is situated further east beyond the main access road.

CHARACTER OF LOCALITY

Directly north of the site, beyond the cycle and footpath, lies a triangular area of woodland, which abuts the A259 and Mill Lane. This area of woodland provides screening of the western aspects of the Retail Park. Further to the north is agricultural land. To the west opposite Mill Lane lies an open area with planning permission for a car showroom. To the southeast and south is residential development.

RELEVANT SITE HISTORY

R/135/94	Formation of new external compound as garden centre.	Approve Cond 30-11-1994
R/155/95	Formation of new entrance doors to the front elevation and new roller shutter door entrance to the side elevation for proposed sub division of retail store.	Approve Cond 13-12-1995
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.	Approve Cond 01-11-1993
R/171/94	Details in pursuance of R/272/87 for non-food retail warehouse space-altered elevations and floor plan layout (previously approved and partly implemented under consent R/216/88).	Approve Cond 08-03-1995
R/172/94		Approve Cond 08-03-1995
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 to County Planning standards site roads and alterations to existing highways	Approve Cond 10-08-1987
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	Approve Cond 05-12-1988
R/24/87	Outline application for 10,000 sq ft of non-food retail warehouse space with associated vehicle parking to County Planning standards and supporting service	Withdrawn 15-11-1988

	area and service road	
R/269/87		Approve Cond 21-12-1987
R/272/04/	Erection of new fencing to increase area of existing garden centre	Inc Docs Ref'd 26-11-2004
R/272/87	Outline application for 18,000 sq ft of non-food retail warehouse space and associated car parking	Approve Cond 16-12-1987
R/32/95		Approve Cond 28-06-1995
R/36/87		Withdrawn 15-11-1988
R/54/06/	Construction of a restaurant building for use for purposes within Class A3 of the Use Classes Order 1987 (as amended)	Approve Cond 20-06-2006
A/206/86	Outline application for 35,000 sq ft non retail warehouse space with associated vehicle parking etc	Approve Cond 14-01-1987
R/231/88	O/L App for 35 000sqft of non food retail warehouse space associated vehicle parking site roads and alt to highway	Approve Cond 14-01-1987
R/47/86	45000sqft of Nonfood warehouse 70270sqft of Ind & office 50 Sheltered res units 5000sqft restaurant 10000sqft office	Refused 23-10-1986

REPRESENTATIONS**Representations received:**

Rustington Parish Council

Rustington Parish Council

No objection.

Comments on Representations received:

None

CONSULTATIONS

West Sussex - Planning Officer

Head of Highways and Transport

Southern Water Services Ltd

Environment Agency

Sussex Police-Community Safety

Worthing Borough Council

Philippa Dart - Parks and Landscapes

Environmental Health - John Green

Engineering Services Manager

Policy Manager

Consultations responses received:

County Highways - The Developer has undertaken a traffic survey on the A259 and reviewed the turning counts. The review of this information has accepted the revised information based on the traffic survey. Future years have also now been modelled and LINSIG outputs provided. This information demonstrates that the proposed signalised junction at the Retail Park/A259 junction would operate within capacity with the additional development traffic and consequently that this proposal would not result in any significant impact upon the existing highway network.

The Transport Assessment as previously mentioned contains limited mention of sustainable transport options. However, considering the nature of the retail unit and the items sold, it is perhaps unlikely for the majority of visits by customers to be made on foot or cycle. Hence this is conceded. A Travel Plan would still be sought via condition to encourage sustainable transport amongst staff.

In highway terms, the proposal is acceptable and no objection would be raised.

District Council's Retail Consultant - I still have some concern about the potential impact of the scheme. In their Retail Assessment Barton Willmore suggest that since there is capacity for the scheme, the existing centre will be capable of trading at its existing levels and furthermore they allow for a 1.5% efficiency increase within the local centres. Part of their case is that since there will be sufficient growth in comparison expenditure for improved trade in the centres as well as the scheme there will therefore be no impact. However, it is not necessarily true that since there is capacity the scheme will not have an impact on the Town Centre. The effect of the development on the existing centre will depend largely on the types of retailers accommodated in the new units and the type of goods sold. The more similar the goods traded to goods currently sold by businesses in the Town Centre the higher the likely impact. For instance the centre could be particularly adversely affected by sales of lower order/discounted clothes or small household goods.

Since potential occupiers are not known now it is difficult to predict what effect the proposal will have on Littlehampton centre. What is known now is that the current occupier which is a typical off centre DIY store is trading along with businesses in the centre. Imposing a bulky goods condition would maintain the status quo and help ensure that the new traders have no more impact than existing trade. Barton Willmore make the point that the existing permission is for unrestricted comparison goods. The implication is that a wider range of goods could be traded under the current permission. I suggest however, that the appropriate consideration is not whether the proposed scheme is worse than what is hypothetically possible but whether it is worse than the current position. A further point here is that the format of the existing scheme tends to limit the type of operator to bulky goods whereas the proposal with a smaller floorspace per unit and mezzanine floors would be attractive to a wider range of traders. If there were no capacity for the scheme the expenditure taken by its traders would be likely to be drawn from the local centres but it does not follow that since there is capacity there will be no impact.

I accept that the source for some expenditure taken by the scheme may be spending which would otherwise be beyond the District boundary in higher order centres. Whether the scheme recaptures this leakage or diverts trade from the local centres will depend on the types of business accommodated. The conventional way of limiting potential impact would be to impose conditions regarding the types of goods to be traded. I suggest that the Council should

impose a condition limiting the goods categories to bulky goods similar to the condition applied to the Bognor Regis Retail Park.

Environment Agency - No objections subject to a Condition regarding surface water drainage being submitted and approved by the Authority.

Environmental Health Officer - Whilst we have received no complaints concerning the existing service area no information is provided in respect of current night deliveries.

With regard to the mitigating circumstances raised:

- I believe that there are few trains passing between around midnight and 0500 hours and a significant increase in noise between these hours may have a detrimental impact on residential amenity.
- Separation distance between housing facades and the delivery/service area appears to be between 10 and 30m.
- The established tree screen will have limited impact on the transmission of noise.

The significance of any detrimental impact by way of noise will depend upon its level, event frequency and duration, particularly between the hours outlined above. The level of noise may be mitigated by delivery practices (guidance previously referenced) for example delivering to a loading bay with no goods handling/storage or FLT movement in the open yard will limit potential noise sources. There is insufficient information supplied with the application in respect of the potential frequency of proposed deliveries at night to determine significance of any detrimental impact.

No information on site lighting is provided. I consider that lighting to the site should conform to ILE Guidance previously referenced, and should be designed to meet obtrusive light limitations for exterior lighting installations for Environmental Zone E3.

County Archaeology - In archaeological terms, this site was first monitored by a local amateur archaeological watching brief in the course of the development some remarkable discoveries were made. In common with many areas of the West Sussex Coastal Plain brickearth, this area of Rustington proved to have evidence of prehistoric and later settlement. Flintwork of Mesolithic date was found as well as Bronze Age pottery, post holes and pits (suggesting settlement, probably huts). Part of a Bronze Age socketed bronze axe was found and later settlement evidence of Roman date was also found indicating that the site and surrounding area was farmed and settled in Roman times as well. The adjacent retail site to the east (which was sampled and recorded in 1994 under the terms of PPG16) also produced evidence of settlement, on this occasion mostly of Iron Age and Romano-British date.

Although, the existing application site has been developed there is the possibility that archaeological features will still survive under areas of lesser ground disturbance such as parking areas. I recommend that, given the limited opportunity to investigate under the constraints of pre-PPG16 Conditions an archaeological watching brief should be undertaken to monitor site clearance and groundworks.

District Council's Engineer - I note that the applicant proposes to retain the existing surface water drainage system, and to construct new soakaways to replace existing soakaways.

Full design calculations for the proposed new soakaways in accordance with BRE 365, and including the supporting ground permeability test results are required.

- The design based on BRE365 needs to cater for storage of a 1 in 10 year storm, between the invert of the entry pipe to the soakaway, and the highest recorded water table. The permeability test to determine the infiltration rate therefore needs to be undertaken during the wetter winter months.

- The design must also contain below the lowest ground level, a 1 in 100 year storm event, plus 30% of the stored volume.

- The soakaway design must satisfy the half emptying of the soakaway within 24 hours.

Southern Water - No objections.

Police - No objections but make the following comments:-

As far as the proposed layout is concerned, there are two access points, one for the public and one for service vehicles. I am aware that the service road is shared, however, I would like to see it controlled. I would also like to see lockable gates to the public area for use out of hours.

The car park layout, with its circulatory route, is good and benefits from passing/static natural surveillance.

Lighting will be important to the whole site and the source should be other than low pressure sodium.

Secondly, physical security for the three "new" buildings is important as the building fabric is the first line of defence.

The Garden Centre area will need substantial perimeter protection in the form of 3 metre high weldmesh fencing. Such a specification would preserve "natural surveillance" in both directions.

The three blocks should all be secured to the same specifications.

All external glazing should be laminated.

Final exit doors and windows should accord with LPS175 SR3.

There should be a wiring harness to each unit to accommodate a future alarm. These units may be suitable for BANSHEE alarms, which omit in excess of 130 decibels, which incapacitates an intruder, making him decamp very quickly.

The applicants may also wish to consider a "hole in the wall" cash transfer system, to reduce opportunities for "over the pavement robberies". There may also be a need for air-locked access to the cash office.

The final exit doors which open outwards would benefit from hinge bolts, to protect the hinge side.

Parks and Greenspace - Some shrubs and trees are lost in this scheme, but none are

significant. A landscaping scheme should be submitted for approval.

Comments on Consultation responses:

Comments noted

POLICY CONTEXT

Designation applicable to site:

Inside Built-Up Area

Class 'A' Road

Class 'B' Road

DEVELOPMENT PLAN POLICIES

West Sussex Structure Plan:	LOC1	Locational Strategy
	NE5	Employment Provision
	NE10	Retail development
	NE17	Roads
	CH1	Character
	ERA1	Making the best use of land
	DEV1	High Quality Development
	DEV5	Parking Provision
	CH7	Archaeology
	DEV4	Travel Needs and Choices
Arun District Local Plan:	GEN2	Built-up Area Boundary
	GEN7	The Form of New Development
	GEN12	Parking in New Development
	DEV26	Criteria for Retail Development
	DEV27	Retail Development Outside the Principal Shopping Areas
	GEN9	Foul and Surface Water Drainage
	GEN18	Crime Prevention
	GEN32	Noise Pollution
	GEN33	Light Pollution

PLANNING POLICY GUIDANCE

PPS1	Delivering Sustainable Development
PPS6	Planning for Town Centres
PPG13	Transport
PPG16	Archaeology and Planning
PPS23	Planning and Pollution Control
PPG24	Planning and Noise

POLICY COMMENTARY

The above policies combine to describe the criteria against which the application will be assessed particularly with regard to visual and residential amenity.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is considered to comply with relevant Development Plan policies in that it would have no materially adverse effect on the visual amenities of the locality or the residential amenities of the adjoining properties, nor would it have an adverse impact upon the established character of the surrounding area.

OTHER MATERIAL CONSIDERATIONS

It is considered that there are no other material considerations to warrant a decision otherwise than in accordance with the Development Plan and/or legislative background.

CONCLUSIONS

The site lies within the built-up area as defined in the Arun District Local Plan where the principle of development is acceptable subject to normal development control criteria being met.

There is an existing DIY Retail Unit on the site that has a Planning Permission that is restricted to non-food goods. This proposal is to demolish that unit and erect three units on the land but increase the floorspace by 2,000 square metres. This is a significant increase in floorspace and the District Council's Retail Consultant has assessed its impact on the vitality and viability on existing town centres, especially Rustington and Littlehampton.

Although the existing unit is restricted only to non-food its only occupier would meet the terms of "bulky goods" type store, and in this way has little impact on the existing town centres. The Retail Consultant has indicated that if the new stores were restricted to bulky goods then the impact in the town centres would be minimal, and the proposal would be in line with PPS6. However, the introduction of other non-food types of operation, for example clothing, shoes etc, would have an adverse impact on the town centres.

County Highways are satisfied that the access to the main A259 can take the extra increase in traffic that the proposals will generate and that the small loss of car parking spaces is acceptable.

Other Consultees have made a number of detailed points that can be dealt with by way of Planning Conditions.

It is not considered that there will be any significant impact on the residential or visual amenities of the area. The buildings will not be any nearer to the existing residential properties than the existing building.

It is therefore recommended that the application be approved subject to the Conditions set out below.

RECOMMENDATION**APPROVE CONDITIONALLY**

- 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 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 and roofs 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 policies DEV1 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

- 3 No development shall take place unless and until there has been submitted to and approved by the Local Planning Authority a scheme of landscaping/hard and soft/, which shall include indication of all existing trees and hedgerows on the land, and details of any to be retained, together with measures for their protection in the course of development.

Reason: In the interests of amenity and of the environment of the development in accordance with policies DEV1 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

- 4 All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons 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 5 years from the completion of the 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 policies DEV1 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

- 5 No development shall take place until details of screen walls and/or fences have been submitted to and approved by the Local Planning Authority and no dwellings/buildings shall be occupied until such screen walls and/or fences associated with them have been erected.

Reason: In the interests of amenity in accordance with policies DEV1 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

- 6 The retail warehouse hereby permitted shall not be used otherwise than for the sale of furniture and floorcoverings; domestic electrical and gas appliances; cycles and cycle parts and accessories; pets and pet supplies; stationary and office supplies and equipment; hardware, DIY goods and decorators' 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 instrument revoking and re-enacting that Order with or without modification).

Reason: To protect the vitality and viability of the town centre and the prospect of town centre developments in accordance with PPS6 and policy DEV27 of the Arun District Local Plan.

- 7 The building shall not be occupied until the 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 policies DEV1, DEV5 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

- 8 The use of any land for car parking shall not be commenced until it has been laid out, surfaced and drained and such land shall not be used thereafter for any purpose other than the parking of vehicles.

Reason: To ensure a satisfactory standard of development in accordance with policies DEV1, NE17 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

- 9 The building hereby permitted shall not be occupied until space has been laid out within the site in accordance with details approved by the Local Planning Authority for the turning of vehicles clear of the public highway and such space shall not thereafter be used other than as a turning area.

Reason: In the interests of road safety in accordance with policies DEV1, NE17 of the West Sussex Structure Plan and GEN7 of the Arun District Local Plan.

- 10 The development hereby approved shall not be occupied until a Travel Plan completed in accordance with current advice from the Department of Transport has been submitted to and approved in writing by the Local Planning Authority.

Reason: To promote and encourage sustainable transport amongst staff in accordance with policy DEV4 of the West Sussex Structure Plan.

- 11 The development shall not proceed until details of the proposed surface water and means of disposal have been submitted and approved by the Local Planning Authority. Surface water drainage shall be carried out in accordance with such details and in conjunction with associated building works.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies DEV1 of the West Sussex Structure Plan and GEN7, GEN9 of the Arun District Local Plan.

- 12 If during development, any visibly contaminated or odorous material not previously identified is found to be present at the site it must be investigated. The local planning authority must be informed immediately of the nature and degree of contamination present. The developer shall submit a Method Statement which must detail how this unsuspected contamination shall be dealt with.

Reason: To ensure that the development complies with approved details in the interests of protection of controlled waters in accordance with PPS23 Planning and Pollution Control.

13. No development shall take place within the area indicated (this would be the area of archaeological interest) until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

Reason: The site may be of archaeological significance and it is important that it is recorded by excavation before it is destroyed by development in accordance with policies CH7 of the West Sussex Structure Plan and AREA17 of the Arun District Local Plan.

14. Details of any external lighting/floodlighting shall be submitted to and approved in writing by the Local Planning Authority before the use hereby permitted commences and the building is occupied. Development shall be carried out in accordance with the approved details.

Reason: to safeguard the amenities of nearby residents in accordance with policies DEV1 of the West Sussex Structure Plan and GEN7, GEN33 of the Arun District Local Plan.

15. All external glazing should be laminated. Final exit doors and windows shall accord with LPS1175 SR3. Final doors which open outwards should have hinge bolts.

Reason: To help crime prevention in accordance with GEN18 of the Arun District Local Plan.

16. INFORMATIVE: The applicant should note that under Part 1 of the Wildlife and Countryside Act 1981, with only a few exceptions, it is an offence for any person to intentionally take, damage or destroy the nest of any wild birds while the nest is in use or being built. Birds nest between March and September and therefore removal of dense bushes, ivy or trees or parts of trees etc. during this period could lead to an offence under the act.

17. INFORMATIVE:

Summary of Reasons for Grant Article 22(1) General Development Procedure Order 1995

SUMMARY

This planning permission is granted because it complies with the policies listed below in that the development would not cause any material adverse effect on visual or residential amenity on the surrounding area and its character and there are no material considerations to indicate otherwise.

RELEVANT POLICIES

STRUCTURE PLAN: DEV1, LOC1, NE5, NE10, NE17, CH1, ERA1, DEV5, CH7, DEV4,

LOCAL PLAN: GEN7, GEN2, GEN12, DEV26, DEV27, GEN9, GEN18, GEN32, GEN33,

NATIONAL POLICIES: PPS1, PPS6, PPG13, PPG16, PPS23, PPS24,

This is only a summary of reasons for granting to comply with Article 22 and full reasons appear in the Officer report.

Health Centre Checks

1.1 Chase & Partners have conducted an assessment of the health and vitality of the centres of Littlehampton and Rustington. Where reliable information is available we have endeavoured to assess the vitality and viability of the centres using the indicators outlined in Annex D of PPS4: Planning for Sustainable Economic Growth. These are:

- diversity of main town centre uses,
- amount of retail, leisure and office floorspace in edge - and out-of-centre locations,
- potential capacity for growth,
- retailer representation and demand,
- rental levels,
- proportion of vacant street level property,
- commercial yields,
- pedestrian flows,
- accessibility,
- customer and residents' views and behaviour,
- perception of safety and occurrence of crime, and
- environmental quality.

1.2 Conclusions are then drawn on the overall health, vitality and viability of each of the centres, based upon these indicators.

2. Littlehampton Town Centre

2.1 Littlehampton is defined in the Arun Indicative Shopping Centre Hierarchy as a town centre. The centre contains approximately 29,000sqm retail floorspace contained within 188 units (GOAD Centre Report 2010). The main shopping areas are found along the pedestrianised High Street and Surrey Street, and Beach Road and Terminus Road.

2.2 Littlehampton is a coastal town that has a number of attractions including the River Arun and the Harbour Park.

Diversity of Uses

- 2.3 Based on the Goad centre report (see **Appendix D**) and our own street surveys conducted during January 2011 the current composition of the town centre is shown in **Table 1** below:

Table 1: Uses in Littlehampton Town Centre

Category	Number of Units	%	National Average (%)	Amount of Floorspace (sqm)	%	National Average (%)
Convenience	15	8	9	5,045	17	17
Comparison	75	40	42	12,263	42	47
Service	58	31	35	6,345	22	23
Vacant	38	20	13	84,868	16	11

Source: Goad Centre Report 2010

- 2.4 **Table 1** demonstrates that the town centre is well provided for in terms of convenience retailing, being on the cusp of national averages. The centre is complimented by a Sumerfield, Sainsbury and Lidl providing a range and choice for convenience shopping.
- 2.5 The centre also has a reasonable presence of comparison retailers and is just below the national average. However, the lack of suitable sized units is likely to be a reason for a stronger major retailer representation.
- 2.6 The centre also has a strong service provision, with almost 50% of units in restaurant, cafe and fast food use. This is potentially representative of its role as a coastal town and the high number of visitors it generates.

Retail Floorspace in Edge-of-Centre and Out-of-Centre Locations

- 2.7 The historic layout of the town centre means that there is limited edge-of-centre retailing and most units are located within the Primary Shopping Area.
- 2.8 The Broadpiece Retail Park is located in an out-of-centre location and contains Tesco, Currys and Wickes stores.

Potential for Growth

- 2.9 There is a masterplan for North Littlehampton that promotes significant mixed use development to the north of the A259. This seeks to develop an additional 1,500 new residential homes and other community and service facilities including sports pitches, schools and health centre.

Retailer Representation and Demand

- 2.10 There are a limited number of major retailers within the centre, possibly as a consequence of the historic layout and smaller unit size available. The recently opened Lidl has bolstered the convenience offer. The town is ranked 1175th nationally and is supported by the number of independent stores in the town, raising its appeal as a coastal, tourist destination.
- 2.11 The FOCUS report on Littlehampton (dated 11/01/11) identifies 10 retailer requirements within the town, which is supported by the EGI database, which breaks this down into three convenience retailers, six comparison and one service user. The floorspace requirements vary with half searching for units between 1,000 – 6,000sqm whilst the remainder seeking smaller units.
- 2.12 This list is not exhaustive and only takes into account national retailers and therefore fails to pick up independent operators that may be interested in locating in the town.

Shop Rents

- 2.13 Details on shop rents for the town are limited. However, the FOCUS Report dated 11/01/11 states that Zone A retail in June 2008 were £45 sqft.

Proportion of Vacant Street Level Property

- 2.14 As stated at paragraph 2.3 there are 38 vacant units, representing 20% of the overall number of units, which is 7% above the national average. In overall floorspace this equates to 4,868sqm representing 16% within the town compared to 11% nationally.
- 2.15 It should be noted, however, that a significant amount of this floorspace relates to existing site allocations that have only recently been granted planning permission such as the Market Square site that has recently been granted consent for 477sqm additional retail.

Pedestrian Footfall

- 2.16 Littlehampton town centre is compact and can be traversed within a few minutes' walk. The centre is considered to be anchored by the Somerfield at East Street and the Sainsbury store at the northern end of the pedestrianised High Street. During the Chase and Partners site visit in January 2011, there was heavy rain and it was therefore difficult to comment of footfall. However, the foodstores were all busy during a Thursday afternoon and it is anticipated that the links between the foodstores would generate much higher levels of footfall under normal circumstances.

Accessibility

- 2.17 Littlehampton is extremely well connected by road (A259) to the majority of the surrounding centres. In terms of public transport within Littlehampton, there is a train station to the west of the primary shopping area providing services to Chichester, Portsmouth and Brighton. There are also a series of bus routes providing access to other centres within the rural hinterland.
- 2.18 There is a pay and display car park within the centre at Church Street and also at the Railway Station, as well as on-street parking on streets within the centre. Overall there are approximately 500 dedicated car parking spaces.

Perception of Safety and Occurrence of Crime

- 2.19 From our own site visits to the centre, there are no obvious signs of crime within Littlehampton. There is little or no graffiti or vandalised property for example.
- 2.20 The FOCUS Report 2011 identifies that there is a significant population of pensionable age (Mosaic Classification: 43% - 'Grey Perspectives') which reflects the environment of the area. This is further enhanced by the tourist facility it presents.

Table 2: Incidence of Crime 2007 –2008

	Littlehampton/Locally		England
Category	Number of Crimes	Crimes Per 1,000 Population	Crimes Per 1,000 Population
Violence Against the Person	2158	14.96	19.97
Robbery	51	0.35	1.85
Burglary in a Dwelling	369	2.56	5.67
Other Burglary	428	5.4	5.8
Theft of Motor Vehicle	305	2.11	4.04
Theft from a Motor Vehicle	931	6.45	9.56

Source: ONS

- 2.21 **Table 2** shows that Arun District has a significantly lower crime rate than the national average.

Town Centre Environmental Quality

- 2.22 The architecture of the buildings within the centre is generally pleasant, with a market town appearance and feel. The pedestrianised High Street allows for ease of movement through the primary shopping area. The waterfront benefits from Harbour Park and is a significant complimentary feature to the town.

Conclusions on Littlehampton

- 2.23 Littlehampton benefits from a limited comparison retail offer, mainly as a consequence of the historic layout of roads and limited opportunity for larger retail units.
- 2.24 It has a reasonable convenience retail offer, with both Sainsbury and Waitrose located within the town centre. This has recently been further bolstered by the new Lidl store. There are a number of independent convenience stores including grocers and butchers.
- 2.25 Vacancy levels appear to be high in the centre, but this is considered to be misleading as a number of sites benefit from planning consent and are awaiting development. The centre performs an important local function and has a strong retail offer. It meets the needs of local residents and visitors to the centre. It is concluded that the centre is both vital and viable and its role and function would not be undermined by the application proposals.

3. Rustington District Centre

- 3.1 Rustington is defined in the Arun Indicative Shopping Centre Hierarchy as a District Centre. The centre is based around a series of parades and that appear to originate from the 1970's. There is dedicated, off-street parking with a one-way road system running in front of the retail units. Based on the Goad Town Centre Report 2009 (Appendix XX) there are 110 units comprising 14,557sqm.

Diversity of Uses

- 3.2 Based on the Goad centre report (see **Appendix D**) and our own street surveys conducted during January 2011 the current composition of the town centre is shown in **Table 1** below:

Table 1: Uses in Littlehampton Town Centre

Category	Number of Units	%	National Average (%)	Amount of Floorspace (sqm)	%	National Average (%)
Convenience	13	12	9	3,735	26	17
Comparison	48	44	42	6,271	43	47
Service	38	35	35	3,242	22	23
Vacant	10	10	13	1,189	8	11

Source: Goad Centre Report 2010

- 3.3 This demonstrates that the centre is very healthy and buoyant in terms of the range of uses when compared against the national average. The centre has an excellent range of independent convenience retailing and is anchored by a Co-op, Tesco Express and Iceland.
- 3.4 The centre has a strong service presence and compliments its local needs function. It also has a notable comparison retail offer with a diverse range of clothing, footwear, jewellers normally associated with higher order centres.

Retail Floorspace in Edge-of-Centre and Out-of-Centre Locations

- 3.5 The linear, parade layout of the centre has resulted in a compact shopping area with restricted edge-of-centre opportunities. There is limited retailing located outside of the primary shopping area at Sea Lane.
- 3.6 Rustington Retail Park is the only out-of-centre floorspace, located approximately 2.7km from the District Centre. This currently houses a Sainsbury's, Halfords and Pets at Home store.

Potential for Growth

- 3.7 Because of the layout of the centre there are limited opportunities for growth within it. There are no retail policy commitments identified in the District Centre.

Retailer Representation and Demand

- 3.8 There are seven convenience multiple retailers in Rustington, accounting for 19% of units, and 7% higher than the national average. As stated above there are three major convenience retailers in the centre which are complimented by Boots and Superdrug.
- 3.9 There are sixteen comparison retailers representing 44% of units in comparison to 53% nationally. Service provision is higher (33%) than the national average (31%).
- 3.10 The EGi database identifies eight retailer requirements within the centre comprising two convenience retailers; five comparison operators and one service business. This does not include any independent retailers that may be vying for retail floorspace in the centre.

Shop Rents

- 3.11 There is no information available on the FOCUS database regarding shop rents.

Proportion of Vacant Street Level Property

- 3.12 The Goad Town Centre Report (**Appendix D**) identifies ten vacant units which is 3% lower than the national level. When the centre was visited in January 2011 only six vacant units could be identified, further demonstrating the low vacancy rate in the centre.

Pedestrian Footfall

- 3.13 The layout of the parades has pedestrian footpaths clearly delineated from the off-street parking and one-way road system. This coupled with the compact nature of the centre means that there is an ease of movement and has the potential for linked trips.
- 3.14 When Chase & Partners undertook a site visit on a wet afternoon in January the Centre was very busy, with limited car parking and a lot of activity in many of the shops. However, no specific pedestrian footfall count was undertaken.

Accessibility

- 3.15 There are a number of bus stops positioned along The Street and Ash Lane connecting Rustington to larger centres including Brighton and Chichester.
- 3.16 The off-street parking in front of the parades is free.

Perception of Safety and Occurrence of Crime

- 3.17 From our own site visit to the centre, there were no visible signs of crime in terms of vandalism or graffiti.
- 3.18 The figures for crime within Rustington relate to Arun as a whole (see table 1 above). Minutes of a meeting of Rustington Parish Council from 2009 presented crime figures for the year:

Criminal damage:	10
Violent crime:	2
Vehicle crime:	5
Burglary:	5
Theft:	11

- 3.19 The centre therefore appears to be a safe area.

Town Centre Environmental Quality

- 3.20 The centre benefits from flower planters, lawned areas, tree lined streets and paved walkways. There are signalised pedestrian crossing points across The Street. The centre has a strong community feel.

Conclusions on Rustington

- 3.21 Rustington has a strong retailer presence in terms of national and independent retailers. The above average levels of convenience and service representation suggest a healthy and buoyant centre that serves a strong local need.
- 3.22 The centre has low vacancy rates and a reasonable retailer demand suggesting that there is investor confidence. Consequently, it is considered that the centre is has a strong vitality and viability.







RECAP

The Retail Capacity forecasting Model

Project:	Arun Retail Study Update	Number:	1005F900								
Client:	Arun District Council										
Date of Latest Revision:	17-May-10	File:	Arun RECAP Model 2010								
Retail Locations Modelled:	<u>Bognor Regis Town Centre</u> <u>New central shops in Bognor Regis</u> <u>Littlington Town Centre</u> <u>Non-central shops in Littlehampton & Bognor Regis Town Centre Perimeters</u>										
Scenarios Modelled:	<table><tr><td>1</td><td>Baseline - Market Shares indicated by the Household Interview Survey remain unchanged.</td></tr><tr><td>2</td><td>Convenience goods market shares attracted by Bognor Regis Town Centre rise due to the proposed town centre developments. Comparison goods market shares attracted by Littlehampton Town Centre also rise to the proposed St Martin's Car Park town centre development. Changes to non-central market shares due to permitted developments.</td></tr><tr><td>3</td><td>Convenience & comparison goods market shares rise in Bognor Regis Town Centre due to town centre developments (egg, Mamas). Comparison goods market shares rise in Littlehampton Town Centre due to town centre development. Non-central market shares rise due to permitted developments, & proposed Sainsbury's in Bognor Regis.</td></tr><tr><td>4</td><td>Convenience & comparison goods market shares rise in Bognor Regis Town Centre due to town centre developments (egg, Mamas). Comparison goods market shares rise in Littlehampton Town Centre due to town centre development. Non-central market shares rise due to permitted developments.</td></tr></table>			1	Baseline - Market Shares indicated by the Household Interview Survey remain unchanged.	2	Convenience goods market shares attracted by Bognor Regis Town Centre rise due to the proposed town centre developments. Comparison goods market shares attracted by Littlehampton Town Centre also rise to the proposed St Martin's Car Park town centre development. Changes to non-central market shares due to permitted developments.	3	Convenience & comparison goods market shares rise in Bognor Regis Town Centre due to town centre developments (egg, Mamas). Comparison goods market shares rise in Littlehampton Town Centre due to town centre development. Non-central market shares rise due to permitted developments, & proposed Sainsbury's in Bognor Regis.	4	Convenience & comparison goods market shares rise in Bognor Regis Town Centre due to town centre developments (egg, Mamas). Comparison goods market shares rise in Littlehampton Town Centre due to town centre development. Non-central market shares rise due to permitted developments.
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Notes:											
Copyright:	DIZ										

SALES CAPACITY OF EXISTING RETAIL WAREHOUSES & SUPERSTORES *

<p>Notes:</p> <p>† Compensation goods: Respaces in household-based supermarkets</p> <p>(1) 2,078 sq. m gross, but 22% allocated as non-retail (e.g. trade sales)</p> <p>(2) 567 sq. m gross, estimated as 470 sq. m net, but 25% excluded as non-retail (trade sale & accessories)</p>	<p>Notes:</p> <p>† Compensation goods: Respaces in household-based supermarkets</p> <p>(1) 2,078 sq. m gross, but 22% allocated as non-retail (e.g. trade sales)</p> <p>(2) 567 sq. m gross, estimated as 470 sq. m net, but 25% excluded as non-retail (trade sale & accessories)</p>
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SALES CAPACITY OF VACANT AND COMMITTED RETAIL DEVELOPMENTS

Sources: Q&A, based on Verdict Research and Retail Partners

Species	Location	How central places in Littlehampton, & Boringdon District Centre For delivery
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Source:	RECAP Model
Notes:	Excludes Subsequent content at the time of the European Coal Security

