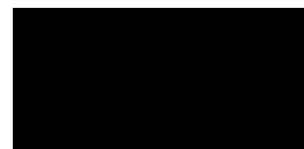




6 New Bridge Street
London EC4V 6AB



**PLANNING STATEMENT:
PROPOSED CHANGE OF USE**

**UNIT G1 RUSTINGTON TRADING ESTATE,
DOMINION WAY, RUSTINGTON, BN16
3HQ**

Date: October 2019

Ref: 14094



Disclaimer

This report has been produced by DWD Property+Planning (DWD), the trading name of Dalton Warner Davis LLP, a Limited Liability Partnership. Registered in England No. OC304838. Registered Office: 6 New Bridge Street, London, EC4V 6AB. The report is intended for the sole and exclusive use of the instructing client or party. The report shall not be distributed or made available to any third party or published, reproduced or referred to in any way without the prior knowledge and written consent of DWD. The report does not constitute advice to any third party and should not be relied upon as such. DWD accepts no liability or responsibility for any loss or damage to any third party arising from that party having relied upon the contents of the report in whole or in part.

October 2019
Ref: 14094



CONTENTS

1.0 INTRODUCTION	1
2.0 SITE LOCATION, DESCRIPTION AND HISTORY	2
Site Location and Description	2
Planning History	2
3.0 THE PROPOSED DEVELOPMENT	5
Trade Uses	5
Trade Definitions	5
4.0 PLANNING POLICY	6
National Planning Policy Framework	6
Arun District Local Plan (2018)	7
5.0 PLANNING ASSESSMENT	9
Principle of Development	9
Highways and Transport	9
6.0 CONCLUSION	10

TABLES

Table 1.1 – Planning History	2
------------------------------------	---

APPENDICES

No table of contents entries found.

Revision	Description	Originated	Checked	Reviewed	Authorised	Date
	Planning Statement	PD	PD	PD	PD	21/10/2019
DWD Job Number: 14094						



1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Store Property Investments Ltd (the ‘Applicant’) in support of a full planning application to change the use at Unit G1 Rustington Trading Estate, Dominion Way, Rustington, BN16 2HQ (the ‘Site’).

1.2 The application relates to the proposed change of use from Class B2 (MOT Test Centre) to B8 (Storage or Distribution) or Use Class B8 (Storage or Distribution) with ancillary trade counter. As such, the description of the proposed development is:

“Change of use of from Class B2 (MOT test centre) to flexible B2/B8 (Storage or Distribution) with ancillary trade counter”.

1.3 This Planning Statement outlines the rationale for the proposed change of use and demonstrates that the proposals are consistent with the National Planning Policy Framework (NPPF) and Development Plan policies that support sustainable development.

1.4 The planning application is supported by the following detailed architectural drawings prepared by Simpson Hilder Associates to illustrate the proposed scheme:

- Location Plan 1:1250 (8206 100);
- Block Plan 1:500 (8206 101);
- Site Plan 1:200 (8206 102);
- Elevations Existing and Proposed (8206 103); and
- Existing and Proposed Floorplans (8206 104).

1.5 In terms of the content of this Statement, the Site and surrounding area are described in Section 2. Section 3 describes the change of use proposals. Section 4 highlights planning policy and an assessment is made in Section 5. Finally, overall conclusions on the planning merits of the proposals are provided at Section 6.

2.0 SITE LOCATION, DESCRIPTION AND HISTORY

Site Location and Description

- 2.1 The application site comprises a single unit occupying a site measuring approximately 0.25 hectares within the Rustington Trading Estate – an industrial estate located in the north of Rustington.
- 2.2 Unit G1 is located in the west of the Rustington Trading Estate and comprises a single storey industrial unit with non-delineated car parking spaces at the forefront of the site. The Site is bound by other industrial and commercial uses to the north, east and south, with residential units to the west of the Site. The surrounding properties include various commercial premises benefiting from B8 (storage and distribution) consents that operate with ancillary trade counters.

Planning History

- 2.3 A summary of the planning history for the Unit G1 is summarised below:

Table 1.1 – Planning History

Reference	Location	Description	Decision	Date
R/308/06	Unit G1 Rustington Trading Estate Dominion Way	Change of use from vehicle pre delivery inspection to MOT workshop	Approved	13/11/06
R/40/97/RC	Unit G1 Dominion Way Rustington	Mezzanine floor	Certificate Issued	17/03/97
R/220/96/RC	Unit G1 Dominion Way Rustington	Application for Regularisation Certificate for alteration to existing mezzanine floor to create storage facility.	Certificate Issued	22/11/96
R/157/84/R	Unit G1, Rustington Trading Estate, Dominion Way	Relax of Building Reg E9 for insertion of	Null	28/06/84



		windows between factory & office		
R/156/84/B	Unit G1, Rustington Trading Estate, Dominion Way	Insert 2 observation windows between office & factory at first floor level	Approved	28/06/84
R/10/83	Unit G.1. Dominion Way, Rustington	Change of use to light industrial	Approved	02/02/83
R/160/77/B	Unit G1, Dominion Way, Rustington Trading Estate	Erection of a free-standing raised storage platform	Approved	03/08/77
R/161/77/R	Unit G1, Dominion Way, Rustington Trading Estate	Relaxation of Building Regulation E5	Null	03/08/77
R/174/76	Unit G1, Dominion Way, east of Penfold Lane	Minor extension & alterations to warehouse with ancillary offices	Approved	07/10/76
R/185/76/B	Dominion Way, east of Penfold Lane Rustington	Erection of Unit 'G' industrial building divided into units G1 & G2 each with office accommodation & car & lorry parking	Approved	29/09/76
R/284/75/R	Unit G, Rustington Trading Estate, East side of Penfold Lane	Relaxation of Building Regulation E5	Null	27/01/76



R/284/75/B	Unit G, Rustington Trading Estate, East side of Penfold Lane	Erection Unit G Industrial building – divided into 2 units G1 & G2 each with office accommodation	Null	21/01/76
R/179/75	Land east of Penfold Land Rustington	Details following Outline Approval R/256/72	Approved	03/10/75
R/161/75	Artex Avenue/Penfold Lane Rustington	Layout of site	Approved	01/10/75
R/4/75	Land east of Penfold Lane, Rustington	App to construct warehouse buildings & ancillary road load/g areas & parking areas – details follow/g outline perm R/256/72	Approved	03/04/75
R/256/72	Land east of Penfold Lane, Rustington	O/A for erection of warehouse buildings	Approved	16/03/73

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The proposal comprises a change of use from Class B2 to B8 (Storage or Distribution) or Use Class B8 (Storage or Distribution) with ancillary trade counter. This would enable the applicant to advertise the property to a range of prospective tenants and would assist in ensuring that the unit is not left vacant for a protracted period of time.
- 3.2 The proposed uses of the unit would return the unit to use that would be compatible with the surrounding area.
- 3.3 No external changes are proposed to the building, which is suitable to accommodate the proposed use, or to the existing access and parking arrangements, which have previously served the unit effectively.

Trade Uses

- 3.4 Trade uses have evolved over time and are mainly located on existing industrial sites/parks operating successfully under standard B2 and B8 consents without concerns. Indeed, we have found that having regard to the nature of the products involved and the uses undertaken, authorities have usually considered the uses to be entirely appropriate at employment locations. However, we acknowledge that not all of the associated elements of their business/operation technically fall within the defined Use Classes of B2 and B8 and therefore we highlight the nature of their operation and recognise the ancillary showroom/trade counters often found within such units and seek to define typical specialist trade uses.
- 3.5 As explained above, these styles of operators can be found on existing employment sites operating successfully across the country. It is considered that these uses are entirely appropriate at these locations and would complement the existing and proposed range of occupiers in this area. The proposed definition is outlined in the following section.

Trade Definitions

- 3.6 When applying for speculative development there is a general trade definition that has been adopted by many developers and authorities as incorporated in our description of development. The definition often uses is: "B8 (Storage or Distribution) with ancillary trade counter".
- 3.7 This seeks to highlight the predominantly storage or distribution nature of their business whilst acknowledging that the units incorporate a trade counter area, and that sales, albeit predominantly to the trade sector, also occur on site.

4.0 PLANNING POLICY

- 4.1 This section sets out the national and local planning policies relevant to the proposals that seek to achieve sustainable development and secure economic growth. In order to demonstrate the level of policy compliance, the proposed change of use is considered against the relevant planning policies in question.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the development plan for the purpose of determining planning applications, then determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 4.3 The statutory development plan for the area, for the purposes of this application, comprises the Arun Local Plan (July 2018), which superseded all policies of the Arun Local Plan 2003. Material considerations of relevance to the application comprise the National Planning Policy Framework (NPPF, 2012), the National Planning Practice Guidance, and Supplementary Planning Documents prepared and adopted by Arun District Council.

Emerging Planning Policy

- 4.4 The NPPF states that decision-takers may give weight to relevant policies in emerging plans according to the stage of preparation, the extent to which there are unresolved objections, and the degree of consistency with the NPPF.
- 4.5 Arun District Council has only recently adopted the new Local Plan and there are no proposals at present for a full or partial review.

National Planning Policy Framework

- 4.6 The NPPF sets out the Government's planning policies for England and how they are expected to be applied. Its purpose is to perform a number of key roles to ensure a strong, responsive & competitive economy, and by identifying and co-ordinating development requirements, including the provision of infrastructure (paragraph 7).
- 4.7 To achieve these core objectives, the NPPF states that the planning system should guide development to sustainable solutions and ensure a high quality, accessible built environment is created (paragraph 7).
- 4.8 The NPPF also explains that the basis for every plan and decision is a presumption in favour of sustainable development, and this is the golden thread running throughout the guidance. The way

in which this is achieved will be different in each area and will depend on local circumstances, which should be taken into account in both plan making and decision taking (paragraph 10-14).

Building a Strong, Competitive Economy

- 4.9 Section 6 of the NPPF the Government is committed to building a strong, competitive economy, securing economic growth in order to create jobs and prosperity. Of particular note, Paragraph 82 sets out that:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”

Promoting Sustainable Transport

- 4.10 Section 9 of the NPPF highlights that transport strategies should be considered and should be balanced in favour of sustainable transport modes, for movement of goods or people.
- 4.11 Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Arun District Local Plan (2018)

- 4.12 The Arun District Council Local Plan was adopted in July 2018 and is used to guide decisions on planning, development and regeneration activity. Whilst not exhaustive, the key planning policies in relation to the proposals are outlined below:

Policy SD SP1: Sustainable Development

- 4.13 When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland).

Policy SD SP1: Employment and Enterprise

- 4.14 The Council, with partners, will promote the sustainable growth of the District’s economy to meet the varying needs of different economic sectors and to support regeneration within the two main towns. In particular, the policy confirms the Council’s support for the provision of appropriately

scaled development where such uses compliment, and are compatible with, employment/commercial uses.

Policy EMP1 DM1: Employment Land: Development Management

- 4.15 The Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy. In particular, the Council will support appropriate proposals for development/re-development of employment floorspace, upgrading or modernisation of existing premises and/or proposals which make more efficient use of under-used employment sites and premises.

5.0 PLANNING ASSESSMENT

- 5.1 The following section assesses the proposals in the light of relevant planning policies and provides justification for the change of use from Class B2 (MOT Test Centre) to B8 (Storage or Distribution) or Use Class B8 (Storage or Distribution) with ancillary trade counter at the Site.

Principle of Development

- 5.2 The Site is located within an existing industrial and commercial estate, with similar uses in the immediate vicinity of Unit G1, also operating with trade counters. Therefore, the proposed change of use is one that reflects the prevailing local character.
- 5.3 The proposed change of use would retain the unit in employment use and is similar to other units within proximity that also operate in B8 use.
- 5.4 Overall, the proposed change of use is considered to comply with planning policies seeking to promote sustainable development.

Highways and Transport

- 5.5 Given the existing lawful use of the Site operating as a MOT test centre (B2), should the Site be brought back into use, the Site will attract vehicular trips by virtue of the expected business that would operate from the premises. With this in mind, it should be noted that the proposals for the change of use to B8 (storage and distribution) will not lead to a material increase in traffic movements over the existing use, especially as there are no proposed changes to the building, access or servicing arrangements. In light of this, the proposed change of use is not considered to have any impacts on the surrounding road network in terms of the associated vehicle trips.
- 5.6 In addition, there are no known capacity and congestion issues within the immediate vicinity of the Site and it would not have a severe residual impact. As such, given the scale of the proposal and the existing permitted use a Transport Statement or Travel Plan have not been deemed necessary in this instance.
- 5.7 Overall, the proposed development would not give rise to highway safety or transport suitability concerns. In light of this conclusion, the proposals are considered to comply with national and local policies seeking to promote sustainable transport.



6.0 CONCLUSION

- 6.1 This Planning Statement has been prepared on behalf of Store Property Investments Ltd (the 'Applicant') in support of a full planning application to change the use at Unit G1 Rustington Trading Estate Dominion Way Rustington.
- 6.2 The application relates to the proposed change of use from Class B2 (MOT Test Centre) to B8 (Storage or Distribution) or Use Class B8 (Storage or Distribution) with ancillary trade counter. As such, the description of the proposed development is:
- "Change of use of from Class B2 (MOT test centre) to flexible B2/B8 (Storage or Distribution) with ancillary trade counter".*
- 6.3 The proposals the subject of this planning application seek to change the use of the unit to B8 (Storage or Distribution) or B8 (Storage or Distribution) with ancillary trade counter in order that the applicant may offer a lease of the premises to a variety of prospective tenants, and thereby secure the long-term occupation of the building.
- 6.4 The proposals have been demonstrated to be compliant with relevant national and local development plan policies concerning planning for sustainable development.
- 6.5 It is, therefore, considered in the spirit of the NPPF and the principle of sustainable development that the proposed change of use warrants the Council's support as Local Planning Authority through the grant of planning permission for the change of use from Class B2 to B8 with ancillary trade counter.