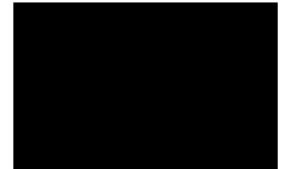




6 New Bridge Street  
London EC4V 6AB



## PLANNING STATEMENT

STARBUCKS DRIVE THRU,  
RUSTINGTON RETAIL PARK

December 2021  
Ref: 15656

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December 2021

Ref: 15646

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| Revision              | Description | Originated | Checked | Reviewed | Authorised | Date       |
|-----------------------|-------------|------------|---------|----------|------------|------------|
| R1                    | DRAFT       | CH         | HS      | HS       |            | 02.12.2021 |
| R2                    | FINAL       | CH         | HS      | HS       | SP         | 17.12.2021 |
|                       |             |            |         |          |            |            |
| DWD Job Number: 15738 |             |            |         |          |            |            |

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December 2021  
Ref: 15646

## 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf Store Property Investments Ltd ('the Applicant') in support of an application for the erection of a drive-thru coffee shop (Class E) with associated parking, service arrangement, landscaping and associated infrastructure (the 'Proposed Development') at Rustington Retail Park, New Road, Rustington (the 'Site').

1.2 The full description of development is as follows:

*"Erection of a drive-thru coffee shop (Use Class E) with associated parking, service arrangement, landscaping and associated infrastructure."*

1.3 This Planning Statement describes the proposed development and assesses the development against the Development Plan. This statement will also outline the material benefits of the proposal.

1.4 The application is supported by the following technical reports that should be read in conjunction with this Planning Statement:

- Planning application forms (DWD);
- Cover Letter (DWD);
- CIL Form (DWD);
- Design and Access Statement (SRA Architects);
- Transport Statement (Mayer Brown);
- Land Contamination Assessment (Geo-Environmental);
- Tree Survey and Planting Schedule (Greenhalgh Landscape Architecture);
- Drainage Layout Plan (SRA Architects).

1.5 In addition, the following drawings have been submitted with the application to illustrate the proposed scheme.

Table 1.1 – Application Drawings

| DRAWING TITLE         | DRAWING REFERENCE            |
|-----------------------|------------------------------|
| Site Location Plan    | 3713-SRA-XX-XX-D-A-PL-001-P2 |
| Block Plan            | 3713-SRA-XX-XX-D-A-PL-002-P2 |
| Existing Site Plan    | 3713-SRA-XX-XX-D-A-PL-005-P2 |
| Existing Level 0 Plan | 3713-SRA-XX-XX-D-A-PL-010-P2 |

|                                  |                              |
|----------------------------------|------------------------------|
| Existing North & East Elevations | 3713-SRA-XX-XX-D-A-PL-021-P1 |
| Existing South & West Elevations | 3713-SRA-XX-XX-D-A-PL-022-P1 |
| Existing Sections AA & BB        | 3713-SRA-XX-XX-D-A-PL-031-P1 |
| Proposed Site Plan               | 3713-SRA-XX-XX-D-A-PL-055-P2 |
| Proposed Level 0 Plan            | 3713-SRA-XX-XX-D-A-PL-060-P2 |
| Proposed Roof Plan               | 3713-SRA-XX-XX-D-A-PL-061-P2 |
| Proposed North & East Elevations | 3713-SRA-XX-XX-D-A-PL-071-P1 |
| Proposed South & West Elevations | 3713-SRA-XX-XX-D-A-PL-072-P1 |
| Proposed AA & BB                 | 3713-SRA-XX-XX-D-A-PL-081-P1 |
| Landscape Plans                  | 210-002_P2                   |
| Planting Plans                   | 210-201_P2                   |
| Tree Constraints Plan            | 210-001_P1                   |
| Plant Schedule                   | 210-SCH-001_P2               |

1.6 The remainder of this Statement is set out as follows:

- Section 2 describes the site and the surrounding area, and planning history;
- Section 3 explains the proposals for the site that are the subject of this planning application;
- Sections 4 sets out the relevant national and local planning policies and other material considerations;
- Section 5 sets out the Sequential Assessment methodology and results;
- Section 6 assesses the proposed development against the development plan; and
- Section 7 sets out our overall conclusions on the planning merits of the proposals.

## 2.0 SITE LOCATION, DESCRIPTION AND PLANNING HISTORY

### Site Location and Description

- 2.1 The Site lies within the administrative boundary of Arun District Council and forms part of the Rustington Retail Park. The Site is located to the south of New Road (the A259) and is approximately 993m north of central Rustington.
- 2.2 The Site is currently in use as existing car parking spaces servicing the Rustington Retail Park. Neighbouring retail units include Pets at Home, Halfords and Dunelm, while a Sainsbury's superstore and associated parking is located immediately to the east. The Site is mainly covered in tarmac hardstanding with white linage but also includes small areas of soft landscaping on the eastern and south-eastern boundaries.
- 2.3 The Site is bound on its northern, eastern and southern boundaries by low-lying shrubbery and associated soft landscape, while the western boundary is formed of existing parking servicing the retail park. Elsewhere, an unnamed path lies to the north of the Site linking New Road (A259), in the east, to Mill Lane (B2187), to the west. The Site is best accessed via the existing slip road off New Road, to the south.
- 2.4 The Manor Retail Park is located approximately 440m to the west of the Site and contains a number out-of-town retail units, including Next, Costa Coffee, Tapi Carpets and Aldi. The nearest residential dwellings are located to the south of the Site, and are separated from the retail park by the existing railway line. Beyond New Road, to the north, is predominantly agricultural land.
- 2.5 Rustington is the nearest town and is located approximately 993m to the south. The larger town of Littlehampton is located approximately 3.10km to the south-west of the Site. In terms of strategic location, the Site is approximately 25km west of Brighton and approximately 40km east of Portsmouth.
- 2.6 In terms of transport connections, the Site is well connected to New Road (A259) to the north. The A259 is the main east-west through-route, connecting to Brighton in the east and Hampshire in the west. Angering Railway Station is located approximately 580m to the east of the Site and provides railway connections to Littlehampton to the west, Brighton to the east, and London to the north-east.
- 2.7 The Site is not located within a Conservation Area, nor are there any locally listed buildings within the immediate surrounding area. The closest heritage assets include the Grade II Listed 'The Dower House' and 'The Gates of Dower House' located approximately 415m to the north of the Site, and

the Grade II Listed 'Ham Manor Golf Clubhouse' allocated approximately 593m to the north of the Site.

- 2.8 In accordance with the Environment Agency (EA), the Site is located in Flood Zone 1 (no/low risk of flooding).

### Policy Designations

- 2.9 The Site is located within the built-up area boundary as defined on the Adopted Proposals Map. The Arun Local Plan 2011-2031 focuses development within the identified built-up area boundaries, with consideration given elsewhere to the positive management of the rural-urban fringe.
- 2.10 Elsewhere, land immediately to the north of the Site is allocated as a 'Gap Between Settlements', separating Angmering, in the north, and Rustington, in the south. The Local Plan seeks to protect the open and undeveloped nature of the identified gaps between settlements to prevent coalescence and retain their separate identity.

### Planning History

- 2.11 The Site forms part of the wider Rustington Retail Park and is currently occupied by existing car parking spaces servicing the neighbouring retail units. A summary of the planning history of relevance to the Site and the proposals is provided in the table below:

Table 2.1 – Planning History

| APPLICATION REFERENCE | DESCRIPTION                                                                                                                                                                                                                                                                                                                                   | DECISION | DECISION DATE |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------|
| R/61/16/A             | 1 No. internally illuminated single sided totem sign at site entrance.                                                                                                                                                                                                                                                                        | Approved | 28/04/2016    |
| R/67/13/NMA           | Application for a non-material amendment following a grant of planning permission R/210/11/ to include a condition listing the approved plans.                                                                                                                                                                                                | Approved | 19/04/2013    |
| R/210/11/             | Renewal of unimplemented planning permission R/72/08/ - 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. | Approved | 05/12/2011    |

|           |                                                                                                                                                                                                                                                                                       |          |            |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------|
| R/10/11/  | 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.            | Approved | 15/07/2011 |
| R/103/10/ | External alterations, reconfiguration of car parking, pedestrian and cycle access to provide refurbished retail unit.                                                                                                                                                                 | Approved | 18/08/2010 |
| R/72/08/  | 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. | Approved | 03/10/2008 |
| R/54/06/  | Construction of a restaurant building for purposes within Class A3 of the Use Classes Order 1987 (as amended).                                                                                                                                                                        | Approved | 20/06/2006 |

### 3.0 PROPOSED DEVELOPMENT

3.1 This section provides a description of the Proposed Development, with the detailed principles discussed in the accompanying Design and Access Statement. This Planning Statement should be read in conjunction with the technical documents listed in Section 1.

3.2 The Proposed Development is for:

*“Erection of a drive-thru coffee shop (Use Class E) with associated parking, service arrangement, landscaping and associated infrastructure.”*

3.3 The application seeks to provide a Starbucks drive-thru coffee shop (Class E) at the Rustington Retail Park, measuring 167.2sqm (GIA).

#### Design and Scale

3.4 The proposal is for a one-storey drive thru coffee shop located within an existing retail park. At its maximum, the proposed height is 6.9m to tower level and 3.9m to parapet level. The proposed unit is namely clad on all sides by vertical fiber cement cladding panels, with the proposed tower to be clad with vertical timber cladding panels.

3.5 Additionally, detailed paving area surrounds the proposed units providing a pedestrianised zone. The entrance is positioned on the western elevation, facing the existing car park. No outdoor seating is proposed.

3.6 The proposal is largely in compliance with the surrounding scale of the retail park, with neighbouring heights largely not exceeding 10-12m. The proposal is therefore considered in compliance with the design and character of the immediate surrounding area.

#### Access

3.7 Access to the existing Rustington Retail Park car park will remain as existing, with ingress and egress for the Site namely taken from the slip road off New Road (A259) to the south. Access to the south is served by an existing roundabout to ensure safe and efficient traffic flow in accessing the Site, and to avoid any conflict between cars. Access to the Site from the north, from the existing car park, is to be retained.

3.8 In accessing the drive-thru unit, a drive-thru lane is proposed. Cars will access the Site from the existing accesses in the north and south and will make a clockwise vehicular route through the Site, before also exiting the Site from the south. A ‘drive-thru order point’ is proposed to the north of the unit, while a ‘drive-thru pick-up point’ is proposed on the eastern elevation. It is envisaged that

cars are able to sufficiently stop at these two points and move through the proposed route safely and sufficiently.

- 3.9 Pedestrian access is namely anticipated from the existing pavement access to the south or from the retail units to the south and south-west. Two existing pedestrian crossing points to the south-west are immediately accessible to the site across, while an additional pedestrian crossing point, to the west, is proposed to ensure safe pedestrian movement to and from the unit. Likewise, sufficient paving is proposed between the car parking units to the west and will be connected to the north and south by pedestrian crossings.

#### Parking

- 3.10 The Rustington Retail Park car park currently comprises 294 car parking spaces. It is envisaged that a net loss of 40 car parking spaces would be required to accommodate the proposed unit, resulting in a total of 254 parking spaces overall. 2no. disabled parking bays are provided immediately adjacent to the proposal, fronting the unit's western elevation.
- 3.11 Elsewhere, cycle parking is proposed from the existing access route to the south. 3 cycle parking spaces are proposed to the front of the unit, to the west, in the form of Sheffield stands.

#### Landscaping

- 3.12 The Site is currently comprised of existing car parking spaces serving the Rustington Retail Park. Currently, the Site is namely covered in tarmac hardstanding but also encompasses small areas of soft landscaping on the eastern and south-eastern boundaries.
- 3.13 The scheme enhances the existing boundaries through the retention of existing shrub planting, combined with the addition of new and varied planting mixes. The proposal seeks to replace the existing five trees with new trees of more suitable species that are more appropriate for the Site. Elsewhere, hard landscaping materials have been selected to comply with that of the surrounding retail park, with a higher quality paving material to surround the proposed building.

#### Refuse and recycling

- 3.14 Waste is proposed to be collected, sorted and taken to the waste storage and collection area on the southern elevation. The development proposes a delivery bay to the front, on the western elevation. The unit will be serviced outside of 8am-10pm and therefore will not conflict with cars entering and existing the retail park.

## 4.0 PLANNING POLICY CONSIDERATIONS

### Planning Policy Context

#### Adopted Policies

4.1 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.

4.1 The Development Plan for Arun District Council relevant to the Site comprises:

- Arun Local Plan 2011 – 2031 (2018);
- Rustington Neighbourhood Plan 2014-2029 (September 2014).

4.2 In addition to the adopted Development Plan Documents, material consideration must be given to the following documents:

- National Planning Policy Framework (July 2021);
- Arun District Design Guide SPD (January 2021); and
- The Arun District Council Parking Standards SPD (January 2020).

4.3 Below is a summary of the key adopted planning policies that are relevant to the Site.

#### **Arun Local Plan 2011-2031 (2018)**

4.4 **Policy SD SP2 (Built-Up Area Boundary)** states that these boundaries are defined for the main towns and villages in the district and shown on the Policies Map. Development should be focused within these areas and will be permitted, subject to consideration against other policies of the Local Plan.

4.5 **Policy RET SP1 (Hierarchy of Town Centres)** states that the hierarchy of centres in Arun will be maintained by supporting and promoting measures which reinforce their role in meeting community needs and providing a focus for a range of activities including: retail, leisure, commercial, office, tourism, cultural, community and residential development. This range of activities will promote economic resilience for the vitality of our centres.

4.6 **Policy RET DM1 (Retail Development)** states that Town Centre uses should be accommodated in town centres. Proposals for Town Centre uses outside the centres defined on the Policies Maps will only be permitted if:

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

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

4.8 Where these criteria are satisfied and permission is granted it will be made subject to planning condition or legal agreement, as appropriate, to restrict the range of products sold.

4.9 Impact assessment for growth of office, leisure and retail development outside of town centres will be required from a threshold of 1,000sqm for Town Centres, Large Service Centres and the Six Villages larger centres and 200 sqm for village and suburban local centres.

4.10 **Policy D SP1 (Design)** states that All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development.

4.11 **Policy D DM1 (Aspects of form and design quality)** states that when considering any application for development the Council will have regard to the following aspects:

- Character
- Appearance/attractiveness
- Impact
- Innovation
- Adaptability
- Crime prevention
- Trees and woodland
- Solar gain

- Public realm
- Layout – movement
- Layout – legibility
- Density
- Scale
- Aspects of form and design quality

4.12 **Policy T SP1 (Transport and Development)** states that to ensure that growth in the district strengthens Arun's economic base, reduces congestion, works to tackle climate change and promotes healthy lifestyles; the Council will ensure that development: provides safe access on to the highway network; contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network.

4.13 **Policy ENV DM4 (Protection of Trees)** states that Development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order(s), (TPO) identified as Ancient Woodland, in a Conservation Area or contributing to local amenity, will not be damaged or destroyed now and as they reach maturity, unless development:

- a) Would result in the removal of one or more trees in the interests of good arboricultural practice. This shall be demonstrated by the developer following the advice of a suitably qualified person which shall be guided by BS 5837 (2012). Details of any advice received having regard to BS 5837 (2012) shall be submitted, in writing, as part of a planning application; or
- b) Would enhance the survival and growth prospects of other protected trees;
- c) The benefits of the proposed development in a particular location outweigh the loss of trees or woodland, especially ancient woodland.

4.14 Where planning permission is granted in any of the above instances, conditions shall be used to ensure that, for any trees which are removed as part of a development, at least an equivalent number of a similar species and age (where practical) are planted on the proposed development site.

4.15 Policy QE SP1 (Quality of the Environment) states that The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not

have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

4.16 Policy QE DM1 (Noise Pollution) states that new noise generating development will need to be supported by:

- a) Evidence to demonstrate that there are no suitable alternative locations for the development.
- b) A noise report which provides accurate information about the existing noise environment, and the likely impact of the proposed development upon the noise environment. The report must also demonstrate that the development meets appropriate national and local standards for noise, as set out in Annex 1 of the Planning Noise Advice Document: Sussex, and any mitigation measures required to ensure noise is managed to an acceptable level.
- c) Evidence to demonstrate that the development will not impact upon areas identified and valued for their tranquillity, including Gaps Between Settlements which are important to the enjoyment of Arun's countryside, its habitats and biodiversity.

4.17 Policy QE DM4 (Contaminated Land) states that The Council promotes, and will permit, the use of previously developed land and the remediation of contaminated land to ensure that land is brought back into use, subject to the following requirements. Prior to any development, the Council will require evidence to show that unacceptable risk from contamination will be successfully addressed through remediation without undue environmental impact during and following the development.

**Rustington Neighbourhood Plan 2014-2029 (September 2014).**

4.18 Arun District Council (ADC) designated a Neighbourhood Area for the whole of Rustington parish for the purpose of preparing the Rustington Neighbourhood Plan (RNP) on 31 October 2013.

4.19 The Rustington Neighbourhood Plan has been prepared in accordance with the Neighbourhood Planning Regulations 2012, the Localism Act 2011 and the Planning & Compulsory Purchase Act 2004.

4.20 The plan sets out specific planning policy proposals for the parish and the document has been made part of the development plan for the parish for the period 1 April 2014 to 31 March 2029.

4.21 The Site is located close to the northern boundary of the Parish boundary. The following policies apply:

4.22 **Policy 4 (Sustainable Drainage)** states that development proposals likely to affect surface water drainage will be supported, provided they are able to demonstrate that they include one or more of the following sustainable drainage design features as appropriate for the ground conditions:

1. permeable driveways and parking areas;
2. water harvesting and storage features;
3. green roofs; and
4. soakaways.

4.23 **Policy 6 (Local Employment)** states that proposals to expand an existing employment or business use will be supported, provided that any impact on flood risk, local amenity, traffic and landscape can be satisfactorily mitigated.

#### **Material Considerations**

##### National Planning Policy Framework (2021)

4.24 In July 2021 the Government published the revised National Planning Policy Framework (NPPF) which sets out the Government's planning policies for England and how these are expected to be applied.

4.25 Paragraph 8 of the NPPF sets out the overarching objectives to achieving sustainable development which include the following:

- Economic – Building a strong, responsive and competitive economy by supporting growth, innovation and improved productivity and by identifying and coordinating the provision of infrastructure;
- Social – Fostering a well-designed and safe built environment, with accessible services that reflect current and future needs; and
- Environmental – To contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, minimising waste and pollution and mitigating and adapting to climate change.

4.26 Paragraph 11 states that at the heart of the NPPF is a presumption in favour of sustainable development, which should be applied by approving development proposals that accord with an up-to-date development plan without delay (section 11c).

4.27 Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless there is a clear

reason for refusing the proposal (based on NPPF policies that protect areas or assets of particular importance), or any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole (paragraph 11d).

- 4.28 Paragraph 87 states that Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 4.29 Paragraphs 91 requires applications that fail to satisfy the sequential test or are likely to have significant adverse impact on one or more of the considerations in paragraph 90, to be refused.
- 4.30 Paragraph 104 requires the environmental impacts of traffic and transport infrastructure to be identified, assessed and taken into account. In addition, it should be ensured that safe and suitable access can be achieved for all users (paragraph 110). Developments should create places that are safe, secure and attractive, and that minimise the scope for conflicts between pedestrians and vehicles (paragraph 112).
- 4.31 Paragraph 119 states Local Planning Authorities are required to promote an effective use of land in meeting the need for various uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.32 Paragraph 130 requires developments to be sympathetic to local character, including the surrounding built environment, and be visually attractive.
- 4.33 Paragraph 131 sets out the importance trees make to the character and quality of urban environments.
- 4.34 Paragraph 134 outlines development should reflect local design policies and government guidance on design, taking into account supplementary planning documents.

#### Supplementary Planning Documents (SPD)

- 4.35 The Arun District Design Guide (2021) provides detailed guidance that will raise design standards across the district, ensuring that only the highest quality development is delivered. The Design Guide has been adopted as a Supplementary Planning Document to the Arun Local Plan 2011-2031. In relation to the proposed development, the Guide includes information on landscape and trees, signage, lighting and building design.

4.36 The Arun Parking Standards SPD (2021) includes parking standards for the old A3 Use Class but this has not yet been updated to refer to the new order which includes Class E (as per the proposed development). For Use Class A3 the standards require 1 space per 5sqm of public area and 2 spaces per bar (or 5m length of bar for large bars) for staff parking to be clearly designated. These standards cannot be easily applied to the drive thru development and it is noted that existing car parking is available. The Transport Statement prepared by Mayor Brown demonstrates that there is sufficient car parking capacity within the Retail Park to accommodate the proposed Starbucks development.

## 5.0 SEQUENTIAL ASSESSMENT

- 5.1 The application site is located within an existing Rustington Retail Park; however, it is defined as an out-of-centre site for the purposes of the sequential assessment. The relevant town centres within the defined catchment area for the application proposals are Littlehampton and Rustington.
- 5.2 Section 4.0 of this Planning Statement sets out the relevant sections of the NPPF setting out the Government's requirements in applying the sequential approach as well as further guidance within the Planning Practice Guidance on how this is to be applied.
- 5.3 Recognising the requirement to demonstrate flexibility, DWD has undertaken a sequential assessment on the basis of seeking sites that would be able to provide a floorspace of 10% higher (183.2sqm) and 10% lower (151.2sqm) than the total floorspace proposed by the Applicant.
- 5.4 The above parameters provide a robust and policy compliant basis for assessment. In considering the sites, we have also applied the 'Dundee' principle to our assessment, as we would emphasise the importance of the meaning of 'suitable'. A recent Secretary of State Decision (LXB RP (Rushden) Limited 11 June 2014) ref: APP/G2815/V/12/2190175) emphasises that the 'suitability' of alternative sites must be considered in terms of the development proposed by the applicant and whether it can be accommodated on an alternative site.
- 5.5 The decision clarifies that the Dundee decision *"expressly rejected the notion that 'suitable' means that one should alter or reduce the proposal so as to fit onto an alternative site"* (Inspectors Report paragraph 8.44). The decision also confirms that *"if a site is not suitable for the commercial requirement of the developer in question then it is not a suitable site for the purposes of the sequential approach"* and that *"the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site"* (Inspectors Report paragraph 8.45).
- 5.6 The operating characteristics of a drive-thru are therefore fundamental to the application of the sequential approach, and the site-specific requirements upon which their location decision are based. In providing a drive-thru, the unit requires good visibility from, and access to, a major road, with sufficient land to accommodate areas for deliveries, parking and a drive-thru element to allow customers to drive up to the unit, place an order and pick up that order. This type of operation is generally not suited to a town centre location, which typically cannot offer sites with on-site parking and sufficient room for a drive-thru facility.

5.7 Following a site visit to both Littlehampton and Rustington on 23<sup>rd</sup> November 2021, the below sites are considered available for the purpose of the sequential test. The detailed sequential assessments are provided in Appendix A of this report, however, in summary it has been found that there are no alternative sequentially preferable sites in either town centre locations. The table below summarises the findings of the sequential assessment:

**Table 6.1 – Results of Sequential Assessment**

| Site                             | Suitable | Available | Commentary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------|----------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 Churchill Court, Rustington    | No       | Yes       | The site is recognised as available but incapable of accommodating development. The unit measures 94.39sqm which is considerably smaller than the proposed development. In any event, the vacant unit is located on the top floor of a three-storey mixed-use block and is therefore inadequate for a proposed drive-thru. Elsewhere, the current car parking and servicing arrangements are also inadequate for the proposed development.                                                                                                                                                                                                 |
| 1-2 Broadmark Parade, Rustington | No       | Yes       | The site is recognised as available but incapable of accommodating development. The unit measures 113.25sqm and is considerably smaller than the proposed development. In any event, the current parking and servicing arrangements are inadequate for the proposed development.                                                                                                                                                                                                                                                                                                                                                           |
| 98 The Street, Rustington        | No       | Yes       | The site is recognised as available but incapable of accommodating development. The unit measures 55.74sqm and is therefore considerably smaller than the proposed development. Additionally, the current location and parking and servicing arrangements are inadequate for the proposed development.                                                                                                                                                                                                                                                                                                                                     |
| Former Waitrose, Littlehampton   | No       | Yes       | The site is recognised as available but incapable of accommodating development. The unit measures 1718.7sqm and is considerably greater than the proposed development, even when applying a significant degree of flexibility. In any event, the Site has recently had a planning application (ref: LU/214/20/PL) approved for the redevelopment of the Site as 36no. residential units and flexible commercial floorspace together with the provision of car and cycle parking, landscaping and associated works. As per the decision notice, permission expires within 3 years of the date of the decision (1 <sup>st</sup> March 2024). |

|                                                                 |    |     |                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------|----|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 48 High Street,<br>Littlehampton                                | No | Yes | The site is recognised as available but incapable of accommodating development. The unit measures 83.6sqm and is therefore considerably smaller than the proposed development. Additionally, the location and current parking and servicing arrangements are inadequate for the proposed development.          |
| 4-6 Anchor Street,<br>Littlehampton                             | No | Yes | The site is recognised as available but incapable of accommodating development. The unit measures 90.95sqm and is therefore considerably smaller than the proposed development. In any event, the location, parking, servicing and facilities to support a drive-thru unit are inadequate.                     |
| 55a High Street,<br>Littlehampton                               | No | Yes | The site is recognised as available but incapable of accommodating development. The unit measures 119sqm and is smaller than the proposed development. In any event, the parking and servicing facilities are inadequate to support the proposed development.                                                  |
| Former Leaders,<br>High Street,<br>Littlehampton                | No | Yes | The site is recognised as available but incapable of accommodating development. No marketing information is available online and therefore DWD are unable to confirm the total vacant floorspace (sqm). In any event, the parking and servicing facilities are inadequate to support the proposed development. |
| Former Save the<br>Children, Surrey<br>Street,<br>Littlehampton | No | Yes | The site is recognised as available but incapable of accommodating development. No marketing information is available online and therefore DWD are unable to confirm the total vacant floorspace (sqm). In any event, the parking and servicing facilities are inadequate to support the proposed development. |
| Terminus Road,<br>Littlehampton                                 | No | Yes | The site is recognised as available but incapable of accommodating development. No marketing information is available online and therefore DWD are unable to confirm the total vacant floorspace (sqm). In any event, the parking and servicing facilities are inadequate to support the proposed development. |
| Former Fireside<br>Bookshop, The                                | No | Yes | The site is recognised as available but incapable of accommodating development. No marketing information is available online and therefore DWD                                                                                                                                                                 |

|                                                                                               |    |     |                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------|----|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Arcade,<br>Littlehampton                                                                      |    |     | are unable to confirm the total vacant floorspace (sqm). In any event, the parking and servicing facilities are inadequate to support the proposed development.                                                                                                                                                |
| The Arcade,<br>Littlehampton                                                                  | No | Yes | The site is recognised as available but incapable of accommodating development. No marketing information is available online and therefore DWD are unable to confirm the total vacant floorspace (sqm). In any event, the parking and servicing facilities are inadequate to support the proposed development. |
| Former Little<br>Luxury, Beach<br>Road,<br>Littlehampton                                      | No | Yes | The site is recognised as available but incapable of accommodating development. No marketing information is available online and therefore DWD are unable to confirm the total vacant floorspace (sqm). In any event, the parking and servicing facilities are inadequate to support the proposed development. |
| Former Chaz Care<br>Agency, Church<br>Street,<br>Littlehampton                                | No | Yes | The site is recognised as available but incapable of accommodating development. No marketing information is available online and therefore DWD are unable to confirm the total vacant floorspace (sqm). In any event, the parking and servicing facilities are inadequate to support the proposed development. |
| <i>For further information please refer to the full sequential assessments at Appendix A.</i> |    |     |                                                                                                                                                                                                                                                                                                                |

5.8 The application site is therefore considered to represent the only site suitable and available for the type of development proposed. On this basis, we conclude that the current application proposals should be considered to comply with the sequential approach to site selection.

## 6.0 PLANNING POLICY ASSESSMENT

### Principle of Development

- 6.1 The proposed scheme represents sustainable economic development on the basis that it would allow the Site to operate as an efficient drive thru facility serving the local area, from the existing Rustington Retail Park.
- 6.2 In principle, the application proposes a Town Centre use outside of the defined town centres as per the Adopted Proposals Map. In accordance with Policy RET DM1, the Local Plan permits Town Centre uses outside of the defined town centre boundaries only where they meet the associated tests per the National Planning Policy Framework. Paragraph 87 of the NPPF states that a sequential test should be applied to planning applications to main town centre uses and only if suitable sites or not available should out of town centre sites be considered. As discussed in detail throughout Section 5 of this statement and in Appendix A, the application site is considered to represent the only site suitable and available for the type of development proposed.
- 6.3 In addition, in order to accommodate the proposed development, it is envisaged that there would be a net loss of 40no. car parking spaces to the existing Rustington Retail Park car park. The results from the car parking survey, discussed in detail below, demonstrates that the existing car park is underutilised and therefore the removal of 40 parking spaces for the proposed unit is considered to have a negligible overall impact. When considered overall, the Rustington Retail Park car park provides a total of 254 parking spaces which could accommodate visitor and staff parking at this Site. Therefore, the loss of 40no. car parking spaces is considered acceptable in principle.
- 6.4 We therefore consider the proposed use of the site as a drive thru facility to be compliant with national and local planning policy seeking to secure sustainable economic growth and productivity.

### Design and Character

- 6.5 A Design and Access Statement prepared by SRA Architects has been submitted in support of this application. Policy D SP1 (Design) requires all development proposals to make efficient use of land and to appropriately reflect the characteristics of the site and local area.
- 6.6 The proposal provides a one-storey drive thru coffee shop within an existing retail park. The development is set back from the slip road by utilising existing levels and enhancing the existing boundaries.
- 6.7 The proposed design of the drive thru unit is specific to Starbucks, however, also appropriately reflects the surrounding characteristics of the retail park. The unit is proposed to be clad on all sides

by vertical fiber cement cladding panels, with the tower element to be clad with vertical timber cladding. Elsewhere, at its maximum the proposed height is 6.9m to tower level and 3.9m to parapet level. This is largely in compliance with the surrounding scale of the retail park, with neighbouring heights largely not exceeding 10-12m. The proposal is therefore considered in compliance with the design and character of the immediate surrounding area.

- 6.8 In light of the above, it is considered that the proposed development is in accordance with national policy and Policy D SP1 of the Arun Local Plan 2011-2031.

#### Transport and Traffic

- 6.9 A Transport Statement has been prepared by Mayer Brown and is submitted with this application, in accordance with Policy T SP1 (Transport and Development), details of which are explored further below.
- 6.10 The statement demonstrates that the Site will not have any adverse traffic impacts on the operation of the local highway network. The proposed development is estimated to generate an addition of one vehicle to the transport network once every 5 minutes during the weekday and once every 3.5 minutes during the evening peak hours. On a Saturday, an additional vehicle every 1.5 minutes is likely.
- 6.11 The proposal is, therefore, considered to comply with national and local planning policy seeking to promote sustainable transport.

#### Car Parking

- 6.12 In order to accommodate the proposed development, it is envisaged that there would be a net loss of 40no. car parking spaces to the existing retail park car park. This would result in an overall reduction of parking spaces from 294 to 254 spaces.
- 6.13 The Transport Assessment confirms that this level of parking provision is appropriate. Following the amendments to the Use Class Order in September 2020, the parking standards set in the Arun District Council Parking SPD do not easily translate to the proposed development. However, as per the SPD, parking standards for Class A3 uses (now Class E) require 1 space per 5sqm of public area and 2 spaces per bar for staff parking. The proposed drive-thru unit will have a public floor space of 112.3sqm and would therefore require 22 car parking spaces within the existing car park, plus an additional 2 spaces for staff.
- 6.14 Additionally, the parking for this development will draw significantly from linked trips, as detailed through the Transport Assessment. The results from the car parking survey data demonstrates that

the existing car park is underutilised and therefore the removal of 40 parking spaces for the proposed unit is considered to have a negligible overall impact. When considered overall, the Rustington Retail Park car park provides a total of 254 parking spaces which could accommodate visitor and staff parking at this Site. 2no. disabled parking bays are to be located immediately fronting the proposal, on the unit's western elevation.

- 6.15 As such, the level of provision is considered broadly compliant with national and local policies and objectives for sustainable transport.

#### Cycle Parking

- 6.16 Currently, the retail park car park provides eight Sheffield stands in the western portion of the Site, in proximity to the Dunelm unit. Standards sets out in the Arun District Council Parking SPD for A3 development are as follows:

- 1 cycle space per 4 staff; and
- 1 space per 25sqm for customers.

- 6.17 As highlighted, following the amendments to the Use Class Order in September 2020, the cycle parking standards set in the Arun District Council Parking SPD (as above) do not easily translate to the proposed development. However using the A3 standards, based on a public floorspace of 112.3sqm, the proposal would require 4 cycle parking spaces for customers. Additionally, it is anticipated that no more than five staff will be working at one time and therefore only one cycle parking space for staff would be required.

- 6.18 In addition to the existing available cycle parking within the Rustington Retail Park car park, the proposal provides three Sheffield stands toward the front of the unit. As such, the level of provision is considered compliant with national and local policies.

- 6.19 In light of the above, it is considered that the proposed development is in accordance with national guidance and Policy T SP1 of the Arun Local Plan 2011-2031.

#### Landscaping

- 6.20 The Site currently comprises of existing car parking spaces serving the Rustington Retail Park. Currently, the Site is namely covered in tarmac hardstanding but also encompasses small areas of soft landscaping on the eastern and south-eastern boundaries. A Landscape Plan and Planting Plan has been prepared by Greenhalgh Landscape Architecture and is submitted in support of this application.

- 6.21 Planting on the undeveloped areas around the proposed building has been maximised. The scheme seeks to replace the five existing trees with new trees that are of a more suitable species and are appropriate to the Site context. 4no. Callery Pear and 1no. Silver Birch trees are proposed along the Site's eastern boundary. Elsewhere, the retention and enhancement of the existing shrub planting is proposed along the Site's northern and eastern boundaries.
- 6.22 Hard landscaping materials have been chosen to comply with the surrounding retail park, with a higher quality paving material to surround the proposed building.
- 6.23 In light of the above, it is considered that the proposed development is in accordance with national guidance and Policy D SP1 and D DM1 of the Arun Local Plan 2011-2031.

#### Trees

- 6.24 A Tree Survey undertaken by Greenhalgh Landscape Architecture accompanies this application and confirms the locations of existing trees and hedgerows on the Site. The proposal looks to replace the five existing trees on Site with trees that are of a more suitable species and are more appropriate to the Site context.
- 6.25 There are no Tree Preservation Orders (TPO's) on, or within close proximity to, the Site. The Tree Survey identifies five existing trees on the Site's eastern boundary, with low-lying shrubbery lying elsewhere on the eastern boundary. Of the five trees surveys, all were identified as Category C (low value). No Category A (most valuable) or Category B (moderate value) trees were identified on Site.
- 6.26 In light of the above, it is considered the proposed development is in accordance with national guidance and Policy ENV DM4 on the Arun Local Plan 2011-2031.

#### Drainage

- 6.27 A Drainage Layout Plan has been prepared by SRA Architects and is submitted in support of this application. The drainage plan demonstrates where the drainage network will require amendments and where the foul drainage and surface water connections will be located in relation to the existing network. In addition, calculations provided by the architects demonstrate that the development proposes an increase in soft landscaped areas which are permeable and a reduction in the impermeable areas. Therefore, the development proposes an improvement to the surface water drainage.

## 7.0 SUMMARY OF PLANNING BENEFITS

- 7.1 As set out in this Planning Statement the proposed development is considered to provide a significant number of planning benefits to the local community both in Rustington and the wider region. Further details of the benefits are set out within the corresponding technical assessment work, however are summarised as follows:
- 7.2 The application Site is located within the built-up area designated in the Arun Local Plan 2011-2031. The application proposals are consistent with the policy allocation of the Site and are a form of sustainable development.
- 7.3 In terms of economic benefits, the proposals would provide employment opportunities within the drive-thru unit.
- 7.4 The proposed drive-thru unit is an acceptable ancillary use within the Rustington Retail Park. The Sequential Assessment demonstrates application site is considered to represent the only site suitable and available for the type of development proposed. Therefore, it is considered that the proposal will not have a detrimental effect on the vitality and viability of either the Rustington or Littlehampton town centres.
- 7.5 The proposed development is acceptable in transport terms. The proposed car parking, access and servicing arrangements comply with all necessary and relevant standards. The proposed development would have no adverse effect on the operation of the local highway network either in terms of capacity or safety.
- 7.6 Elsewhere, the proposed development is of a high-quality design and its layout and configuration are appropriate to the established character of the area. The proposed development will make a positive contribution towards landscaping and the general environment of the site and the wider local area.
- 7.7 In addition, the proposed development provides planting on the undeveloped areas around the Site to provide sufficient ecological corridors and to support local biodiversity.
- 7.8 Overall, the proposed development represents an opportunity to make efficient use of the Site and provides a variety of economic, social and environmental benefits.

## 8.0 CONCLUSION

- 8.1 The application Site is located within the built-up area boundary as defined on the Adopted Proposals Map. The Arun Local Plan 2011-2031 focuses development within the identified built-up area boundaries, with consideration given elsewhere to the positive management of the rural-urban fringe. The application Site forms part of the wider Rustington Retail Park comprising a number of out-of-town retail units and it has access directly onto the strategic road network (A259).
- 8.2 The proposals, the subjection of this planning application, seek the development of a drive-thru coffee shop (Use Class E) with associated parking, service arrangement, landscaping and associated infrastructure. The proposed development will provide additional high-quality retail floorspace within an existing retail park and will create local employment opportunities.
- 8.3 The technical assessments prepared and submitted with this planning application demonstrate that the development does not cause any unacceptable adverse impacts with regards to design and local character, heritage assets, landscape, transport.
- 8.4 Taking into account the above, and weighing up the planning balance, it is considered that the benefits of the proposed development are considerable. The development is considered to comply with the Development Plan as a whole and there are no material considerations that indicate planning permission should not be granted due to unacceptable adverse impacts as a result of the proposed development.
- 8.5 As demonstrated in the planning policy section of this report, the National Planning Policy Guidance contains a presumption in favour of sustainable development. Paragraph 11 of the NPPF states *“for Decision-taking this means: approving development proposals that accord with an up-to-date development plan without delay. Or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*
- 8.6 All key planning considerations have been taken into account in the preparation of the development proposals, which comply with national and local Development Plan policies, and

therefore warrants support from the Local Planning Authority and should be determined without delay as per paragraph 11 of the National Planning Policy Framework.

**APPENDIX A – DETAILED SEQUENTIAL ASSESSMENT PREPARED  
BY DWD**

#### 4 Churchill Court, Rustington



|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Site Area / Floorspace</b> | 94.39 sqm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Description</b>            | <p>The Site is situated within a prominent town centre location, within Churchill Parade. The unit is located at 112 The Street, a subsidiary of Rustington's primary shopping district (approximately 63m south of Site). As per the Arun Local Plan (2018), the Site is located within the Town Centre Boundary and forms part of a 'Secondary Shopping Frontage'.</p> <p>The unit is part of a purpose-built block, with retail units located on the ground floor and offices on the first and second floors. Offices on the upper floors are largely open plan.</p> <p>Following a review of the marketing brochure, the unit on offer is a second-floor office space. Little to no retail frontage is available to the upper floors, with the upper floor windows far smaller than those of ground floor retail units. In addition, currently no retail signage for the upper floors is visible.</p> <p>The Site has prominent street frontage and is well connected to neighbouring shopping frontages, to the south and east. The Churchill Parade car park lies immediately to the west of site, offering 118 car parking spaces and all-day parking. A smaller permit-only car park lies immediately east of Site. Over 400 car parking spaces in the surrounding area are free for three hours.</p> |
| <b>Availability</b>           | The unit is understood to be vacant.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    | <p>A marketing brochure, published by SHW in April 2021, is available online. Following web-based research, the unit is still listed on SHW's website for lease.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Suitability</b> | <p>The unit measures approximately 94sqm and is understood to be located on the top floor of a three-storey mixed-use block. The purpose-built block comprises retail units on the ground floor and office space on the first and second floors. Therefore, the unit as a whole is significantly smaller than the application proposals and does not provide suitable servicing arrangements, given its top floor location.</p> <p>Furthermore, the unit is located within a Secondary Shopping Frontage and would therefore support retail uses in principle. However, from the marketing information available, it is understood that the unit is being leased as office space.</p> <p>The current parking arrangement is inadequate. A public car park (Churchill Parade car park) is located immediately west of the unit, however, is to serve all retail units in the immediate surrounding area. A smaller permit-only car park is located to the east. In addition, the Churchill Parade car park is likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>Elsewhere, the top floor location would not facilitate a sufficient drive-thru route, nor is there land immediately available nearby to support this. In providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail units and parking spaces within the town centre boundary.</p> <p>Elsewhere, the unit is not clearly visible from a highway network to capture passing trade and would therefore not meet the operational requirements of the proposed end-user.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals.</p> |
| <b>Summary</b>     | <p>4 Churchill Court is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit is too small and would not satisfy the operational requirements of the tenants who would occupy the application proposals in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes that the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

## 1-2 Broadmark Parade, Rustington



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|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Site Area / Floorspace</b> | 113.25 sqm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Description</b>            | <p>The unit is located along Broadmark Parade, fronting Ash Lane and Broadmark Lane to the west. As per the Arun District Local Plan, the Site is located within the Town Centre Boundary and the retail strip is designated as a 'Secondary Shopping Frontage'.</p> <p>The premises is a ground floor commercial property, with car parking provision to the rear. From the marketing brochure, it is understood that this parking provision can accommodate six cars.</p> <p>The unit fronts onto a prominent street frontage, with Ash Lane / Broadmark Lane being a main north-south road through Rustington. The existing retail unit provides maximum opportunities for retail store frontage, with signage opportunities available. Considerable space is given to pedestrian movement in front of the proposed unit, with the potential for outdoor seating opportunities available. Neighbouring retail tenants include EJ Moyle LLP, Highdown Carpets, KFC and Oxfam.</p> <p>The surrounding retail strip front Churchill Parade and The Street, Rustington's primary shopping district.</p> <p>Surrounding car parking includes the Waitrose car park, approximately 23m east of the Site; the Churchill Parade car park, approximately 122m north-west of the Site; and formal parking bays along The Street, approximately 30m west of Site.</p> |

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|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Availability</b> | It is understood the unit is currently vacant. A marketing brochure, produced by SWH in January 2021, is available online.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Suitability</b>  | <p>The unit is located on the ground floor of a two-storey mixed-use block and measures approximately 113sqm. The unit is considered a suitable size (in terms of floorspace) for the operational requirements of the proposal, however, is considered unsuitable in terms of location and servicing.</p> <p>The unit is located along a Secondary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit is considered an in-line retail unit and is bound to the north by EJ Moyle LLP and to the south by Highdown Carpets. In providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail and office space within the town centre boundary.</p> <p>The current car parking arrangement is inadequate. From the marketing information available, it is understood six parking spaces to the rear of the unit are included in the lease agreement. DWD understand this is a private car park and is shared with EJ Moyle LLP. Therefore, the addition of retail parking spaces would not be acceptable in this location. Larger car parks are located approximately 23m east (Waitrose car park) and 122m north-west (Churchill Parade car park), however, would require customers to park and walk to the unit independently. In addition, both car parks are likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>Elsewhere, land immediately to the front of the unit is an enlarged pedestrianised zone and would not support the provision of suitable parking to serve the unit.</p> <p>Ash Lane / Broadgate Lane is the main north-south vehicular route through the town centre and therefore the unit is clearly visible from the adjacent highway network. However, it is assumed that the current car parking arrangement and road network is inadequate to support a drive-thru facility at this location.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals.</p> |
| <b>Summary</b>      | <p>1-2 Broadmark Parade is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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## 98 The Street, Rustington



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|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Site Area / Floorspace | 55.74 sqm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Description            | <p>The proposed unit is located along The Street, Rustington, and forms part of a parade of similar retail and restaurant premises. The Site fronts onto The Street (the B2140) and is separated from the road by a large pedestrian path. The immediate surrounding area is a mixture of retail and residential, with Churchill Parade approximately 53m east from the Site.</p> <p>As per the Arun District Local Plan (2018), the Site is located within the Town Centre Boundary and is located along a designated 'Secondary Shopping Frontage'. The Street (the B2140) is a major road, running east-west from Ash Road to North Lane.</p> <p>The property is a two-storey commercial premises, previously in use as 'Spice Zone' (Class E). The property offers a large street frontage and appropriate retail signage.</p> <p>The property is served by parking to the front and rear, in the form of semi-informal car parking bays. In addition, the Site is well served by public transport links with a bus stop located immediately to the front of the site, providing access to the local bus services 9, 12 and 700. The closest major car parks are located approximately 55m north-east of the Site (Churchill Parade car park) and 310m east of the Site (the Waitrose car park). Formal parking bays are provided to the front of Churchill Parade, approximately 50m east of the Site.</p> |

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|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     | Neighbouring properties include The Street Fish Bar and Playcentre Pre-School.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Availability</b> | It is understood that the unit is currently vacant. A marketing brochure, produced by SHW in August 2021, is available online.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Suitability</b>  | <p>The unit is located on the ground floor of a two-storey mixed-use block and measures approximately 56sqm. Therefore, the unit as a whole is significantly smaller than the application proposals.</p> <p>The unit is located along a Secondary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit is considered an in-line retail unit and is bound to the east by existing retail units. Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail space within the town centre boundary.</p> <p>The car parking provision at the Site is inadequate. From the marking information available, it is understood that two parking spaces (one to the front, one to the rear) are included within the leasing agreement. From the site visit (conducted November 2021) it is understood that car parking to the rear is permit only and therefore the addition of retail parking at this location would be acceptable.</p> <p>Elsewhere, land immediately to the front of the unit is an enlarged pedestrianised zone and would not support the provision of suitable parking to serve the unit.</p> <p>The Street (the B2140) is the main east-west vehicular route through the town centre and therefore the unit is clearly visible from the adjacent highway network to capture passing trade. However, it is assumed that the current car parking arrangement and road network is inadequate to support a drive-thru facility at this location.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <b>Summary</b>      | <p>98 The Street is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit is too small and would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

## Former Waitrose, Littlehampton



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| Site Area / Floorspace | 1718.7 sqm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Description            | <p>The property is located approximately 65m north of the High Street and is bound to the north by Avon Road, to the east by East Street, to the south by Anchor Springs and to the west by a pedestrianised passageway. The Site is best accessed via Avon Road and East Street. The immediate surrounding area is mixture of both retail and residential properties.</p> <p>The Site benefits from a car park immediately adjacent to the north, to the north. From a review of the area on Google Maps, this appears to be a private car park. It could be assumed this car park was in use by Waitrose, when it occupied the building. Elsewhere, the Anchor Springs car park lies immediately adjacent, to the south and the St Martins car park lies approximately 60m west of Site.</p> <p>As per the Arun District Local Plan (2018), the Site is located within the Economic Growth Area, Town Centre Boundary and is situated along a designated 'Secondary Shopping Frontage'. Neighbouring properties include Carpetright and Coastal Cycles &amp; Dutch Bike Shop.</p> <p>The retail property provides an open frontage and opportunities for retail signage to the north west, facing the private car park. The proposed location provides little opportunity for large pedestrianised zones, with the building surrounded on three sides by roads.</p> <p>As per Realla, the building was constructed in 1989 and was in use as a Waitrose (Class E) from 2011. In March 2015, it was announced that</p> |

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|                     | <p>this location would close and the Waitrose would relocate to Rustington.</p> <p>A planning application has recently been approved for the redevelopment of the Site – see below.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Availability</b> | <p>It is understood that this site is vacant.</p> <p>The Site has recently had a planning application (ref: LU/214/20/PL) approved for the redevelopment of the Site as 36no. residential units and flexible commercial floorspace together with the provision of car and cycle parking, landscaping and associated works. See planning history document.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Suitability</b>  | <p>The unit measures approximately 1719sqm and is therefore too large to accommodate the application proposals, even when applying a significant degree of flexibility.</p> <p>Given the size of the unit, the Applicant would need to enter into an agreement with a third party to utilise the remainder of the unit, which could result in potential conflicts and legal agreements, resulting in abortive costs and time delays.</p> <p>In addition, it is understood that a planning application (ref: LU/214/20/PL) was recently granted permission in March 2021 for the demolition of the vacant unit and the redevelopment of the Site to comprise 36no. residential units (Class C3) and flexible commercial floorspace, together with the provision of car and cycle parking, landscaping and associated works.</p> <p>Following a review of the approved drawings, it is understood the application seeks to redevelop the vacant unit into two residential blocks, with a third residential block developed in place of the car park.</p> <p>As per the decision notice, permission expires within 3 years of the date of the decision (1<sup>st</sup> March 2024).</p> <p>In any event, it is considered that the unit would not be suitable for the application proposals owing to its size.</p> |
| <b>Summary</b>      | <p>The Former Waitrose is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit is too large and would not satisfy the operational requirements of the tenants who would occupy the application, in terms of size. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

## 48 High Street, Littlehampton



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| <b>Site Area / Floorspace</b> | 83.6 sqm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Description</b>            | <p>The unit is an 'in-line' retail unit, located fronting the pedestrianised zone of the High Street, Littlehampton. It is bound to the north by the High Street and to the south by Sparks Court. The immediate surrounding area is primarily retail, with residential units to the south, east, north-east and north-west.</p> <p>The Site benefits from fronting onto the pedestrianised zone of the High Street, which allows for a prominent street frontage and retail signage. The existing property is a ground floor commercial unit, previously in use as 'Cassino' (Class E). The store is north-facing and consideration should be given to the large footfall expected along the High Street. Neighbouring properties include Cassino (relocated), 'LA Sport Themed Barbers' and Betfred.</p> <p>As per the Arun District Council Local Plan (2018), the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Primary Shopping Frontage'.</p> <p>The St. Martin's car park is located approximately 94m north-west of the Site, while the Anchor Springs car park is approximately 91m north-east of the Site.</p> |
| <b>Availability</b>           | It is understood that the unit is vacant.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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|                    | A marketing brochure, produced by Michael Jones & Company, is available online.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Suitability</b> | <p>The unit is located on the ground floor of a three-storey mixed-use block and measures approximately 84sqm. Therefore, the unit as a whole is significantly smaller than the application proposals.</p> <p>The unit is located along a Primary Shopping Frontage and therefore a retail unit would be acceptable, principle. However, the unit is considered an in-line retail unit and is bound on either side by existing retail units. Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail space within the town centre boundary.</p> <p>The car parking at the Site is inadequate. From a review of the marketing information available, an allocated parking space to the rear is included within the lease agreement. However, from a review this location is unsuitable for retail parking space. The nearest car park is the Anchor Spring car park approximately 91m north (front) of the Site. In addition, the unit front the pedestrianised zone of the high street and therefore the immediate surrounding land is unable to accommodate a sufficient road network to support a drive-thru facility at this location. Likewise, the High Street location limits the unit from being visible and accessible from the nearby highway network and therefore does not satisfy the operational requirements of the end-user.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <b>Summary</b>     | <p>48 High Street is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit is too small and would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

#### 4-6 Anchor Street, Littlehampton



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| <b>Site Area / Floorspace</b> | 90.95 sqm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Description</b>            | <p>The unit is an 'in-line' retail unit, fronting Anchor Street, Littlehampton. It is bound to the north by Anchor Street, to the west by Duke Street and to the south by private car parking. The immediate surrounding area is primarily retail, with residential units to the north, north-west and north-east.</p> <p>As per the Arun District Local Plan (2018), the Site is located within Economic Growth Area, Town Centre Boundary and is situated along a designated 'Secondary Shopping Frontage'. Neighbouring properties include the 'Charity Shop' and Bah-Humbug Sweets.</p> <p>The property is a ground floor unit within a two-storey commercial premises, previously in use as 'EazyLay' (Class E). The property offers a large street frontage and appropriate retail signage. The store is north-facing and consideration should be given to the large footfall expected along Anchor Street towards the High Street.</p> <p>As highlighted, the Anchor Spring car park lies approximately 27m east of the Site, while the St Martins car park lies approximately 35m west of the property</p> |
| <b>Availability</b>           | <p>It is understood that the unit is vacant.</p> <p>A marketing brochure, produced by SHW in September 2021, is available online.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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| <p><b>Suitability</b></p> | <p>The unit is located on the ground floor of a two-storey commercial block and measures approximately 91sqm. Therefore, the unit as a whole is significantly smaller than the application proposals.</p> <p>The unit is located along a Secondary Shopping Frontage and therefore a retail unit would be acceptable in principle. However, the unit is considered an in-line retail unit and is bound on either side by existing retail units. Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail space within the town centre boundary.</p> <p>The car parking provision at the Site is inadequate. From the marketing information available, it is understood no parking spaces are included within the leasing agreement. A private car park is to the rear of property, while the unit fronts Anchor Springs. Anchor Springs is a one lane one-way system and therefore would not support the infrastructure required to facilitate a drive-thru at this location. Elsewhere, St Martin's car park is located to the west of the unit and provides general parking for the wider town centre. The car park is likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>Elsewhere, Anchor Springs is a minor road and therefore the unit would not sufficiently be visible from the wider highway network, satisfying the operational requirements for the end-user. It is considered that the current car parking arrangement and road network is inadequate to support a drive-thru facility at this location.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <p><b>Summary</b></p>     | <p>2-4 Anchor Springs is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit is too small and would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

## 55a High Street, Littlehampton



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| <b>Site Area / Floorspace</b> | 119 sqm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Description</b>            | <p>The unit is an 'in-line' retail unit, located fronting the pedestrianised zone of the High Street, Littlehampton. It is bound to the south by the High Street and to the north by Anchor Springs car park. The immediate surrounding area is primarily retail, with residential units to the south, east and north-east.</p> <p>The Site benefits from fronting onto the pedestrianised zone of the High Street, which allows for a prominent street frontage and retail signage. The existing property is a ground floor commercial unit, previously in use as TUI (Class E). The store is south-facing and consideration should be given to the large footfall expected along the High Street. Neighbouring properties include Costa, RSPCA and Halifax. The neighbouring unit at 57 High Street is understood to currently be vacant, with a lease agreed.</p> <p>As per the Arun District Council Local Plan, the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Primary Shopping Frontage'.</p> <p>As highlighted, the Anchor Spring car park lies immediately north of the Site. Elsewhere, the St Martins car park lies approximately 94m north-west of the property, while the Manor House car park is located approximately 120m east of the Site.</p> |
| <b>Availability</b>           | <p>It is understood that the unit is currently vacant.</p> <p>A marketing brochure, produced by HRH Retail, is available online.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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| <b>Suitability</b> | <p>The unit is located on the ground and first floors of a two-storey commercial block and measures approximately 119sqm.</p> <p>The unit is located along a Primary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit is considered an in-line retail unit and is bound on either side by existing retail units (it is understood the neighbouring 57 High Street is currently vacant but has a lease agreed). Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail space within the town centre boundary.</p> <p>The car parking provision at the Site is inadequate, with the nearest car park being the Anchor Spring car park to the north (rear) of the Site. In addition, the unit fronts the pedestrianised zone of the high street and therefore the immediate surrounding land is unable to accommodate a sufficient road network to support a drive-thru facility at this location. Likewise, the high street location limits the unit from being visible from the nearby highway network and therefore does not satisfy the operational requirements of the end-user.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <b>Summary</b>     | <p>55a High Street is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit is too small and would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

## Former Leaders, High Street, Littlehampton



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| <b>Site Area / Floorspace</b> | Unknown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Description</b>            | <p>The unit is an 'in-line' retail unit, located fronting the East Street / High Street junction, Littlehampton. The immediate surrounding area is primarily retail, with residential units to the south, east and north-east.</p> <p>The Site benefits from prominent street frontage and retail signage. The existing property is a ground floor commercial unit, previously in use as Leaders (Class E(g)). The store is north-facing and consideration should be given to the large footfall expected along the High Street, to the west. Neighbouring properties include Aspire, Kamsons Pharmacy and Boots.</p> <p>As per the Arun District Council Local Plan, the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Primary Shopping Frontage'.</p> <p>The Anchor Spring car park lies approximately 60m north-west of the Site, while the Manor House car park is located approximately 60m east of the Site. Elsewhere, St Martins car park lies approximately 152m north-west of the Site.</p> |
| <b>Availability</b>           | <p>It is understood that the unit is currently vacant, following a site visit in November 2021.</p> <p>No marketing information is available online and it is unclear whether the unit is being marketed for lease. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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| <p><b>Suitability</b></p> | <p>The unit is located on the ground floor of a three-storey mixed-use block.</p> <p>The unit is located along a Primary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit is considered an end-cap retail unit and is bound to the east by existing retail units. Elsewhere, 'The Arcade' is located immediately to the west of the unit and is designated a Primary Shopping Frontage within the Arun District Local Plan, providing a pedestrianised shopping street. Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail space within the town centre boundary.</p> <p>The unit fronts the junction between East Street and the High Street and would therefore be suitability visible from the transport network. However, the junction would provide little-to-no suitability for vehicles to safely and appropriately access the site, in accordance with the operational requirements of the proposed drive-thru unit.</p> <p>The car parking provision at the Site is inadequate. The unit provides no suitable retail parking, with the nearest car parks being the Anchor Springs car park to the north-west, and the Manor House car park to the east. In addition, both car parks are likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <p><b>Summary</b></p>     | <p>The Former Leaders is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

## Save the Children, Surrey Street, Littlehampton



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| <b>Site Area / Floorspace</b> | Unknown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Description</b>            | <p>The unit is an 'in-line' retail unit, located fronting Surrey Street, Littlehampton. The immediate surrounding area is primarily retail, with residential units to the west, north-west and south.</p> <p>The Site benefits from prominent street frontage and retail signage. The existing property is a ground floor commercial unit, previously in use as Save the Children (Class E). The store is west facing and is expected to experience large footfall from the High Street, to the north. Neighbouring properties include Golden House Chinese Takeaway, Iceland and Lidl.</p> <p>As per the Arun District Council Local Plan, the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Secondary Shopping Frontage'.</p> <p>The Surrey Street car park lies approximately 45m south-west of the Site, while elsewhere the St Martins car park is located approximately 140m north-west of the Site.</p> |
| <b>Availability</b>           | <p>Following a site visit in November 2021 it is understood Save the Children have ceased trading at this location and the unit could be considered vacant.</p> <p>No marketing information is available online and it is unclear whether the unit is being marketed for lease. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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| <b>Suitability</b> | <p>The unit is located on the ground floor of a two-storey mixed-use block. DWD are unable to confirm the total vacant floorspace (sqm).</p> <p>The unit is located along a Secondary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit is considered an in-line retail unit and is bound on either side by existing retail units. Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail space within the town centre boundary.</p> <p>The unit fronts Surrey Street and is therefore visible from the high network to capture passing trade. However, as Surrey Street is a one-way street, it is considered unsuitable for vehicles to safely and appropriately access the site, in accordance with the operational requirements of the proposed drive-thru unit.</p> <p>The car parking provision at the Site is inadequate. The unit provides no suitable retail parking, with the nearest car parks being the Surrey Street car park in the south-west and the St Martins car park in the north west. In addition, both car parks are likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <b>Summary</b>     | <p>The Save the Children is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

## Terminus Road, Littlehampton



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| <b>Site Area / Floorspace</b> | Unknown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Description</b>            | <p>The unit is a ground floor commercial unit, fronting Terminus Road. The immediate surrounding area is mixed in nature, with retail uses to the west, residential uses to the north and south, and Littlehampton railway station located approximately 78m north-west.</p> <p>The Site benefits from prominent street frontage and forms part of a new-build development to provide 52no. residential units. The store is north facing and consideration should be given the large footfall expected to and from Littlehampton railway station in the north-west and the High Street in the east.</p> <p>As per the Arun District Council Local Plan, the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Secondary Shopping Frontage'.</p> <p>The Littlehampton railway station car park is located approximately 110m north-west of the Site, while the St Martins car park lies approximately 80m north of the Site.</p> |
| <b>Availability</b>           | <p>Following a site visit in November 2021 it is understood the site is vacant.</p> <p>No marketing information is available online and it is unclear whether the unit is being marketed for lease. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| <p><b>Suitability</b></p> | <p>The unit is located on the ground floor of a two-storey mixed-use block. DWD are unable to confirm the total vacant floorspace (sqm).</p> <p>The unit is located along a Secondary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit forms part of a retail parade and is bound to the west by the existing residential units of Antonia Court. Therefore, in providing a sufficient drive-thru facility and route at this location, this would result in the loss of existing residential units within the town centre boundary.</p> <p>The unit fronts Terminus Road and is therefore suitably visible from the highway network to capture passing trade. By any means, it is considered the unit does not meet the operational requirements for the proposed end user in terms of location, parking availability and servicing.</p> <p>The car parking provision at the Site is inadequate. The unit provides no suitable retail parking, with the nearest car parks being the Littlehampton railway station car park to the west, and St Martins car park to the north. As both car parks are likely to be extremely busy at peak customer hours this would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <p><b>Summary</b></p>     | <p>Terminus Road is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

## Former Fireside Bookshop, The Arcade, Littlehampton



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| <b>Site Area / Floorspace</b> | Unknown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Description</b>            | <p>The unit is an 'end-gap' retail unit, located fronting The Arcade and Arcade Road, Littlehampton. The immediate surrounding area is primarily retail, with residential units to the south.</p> <p>The Site benefits from prominent street frontage and retail signage. The existing property is a ground floor commercial unit, previously is use as Fireside Bookshop (Class E). Consideration should be given to the large footfall expected to and from the High Street in the north.</p> <p>As per the Arun District Council Local Plan, the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Primary Shopping Frontage'.</p> <p>Manor House car park lies approximately 71m north-east of the Site, while the Anchor Springs car park is located approximately 100m north of the Site.</p> |
| <b>Availability</b>           | <p>Following a site visit in November 2021 it is understood the site is vacant.</p> <p>No marketing information is available online and it is unclear whether the unit is being marketed for lease. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Suitability</b>            | <p>The unit is located on the ground floor of a mixed-use retail arcade. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|                | <p>The unit is located along a Primary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit forms part of a retail arcade, and is bound to the north by existing retail uses. Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail spaces within the town centre boundary.</p> <p>The unit fronts both The Arcade, to the west, and Arcade Road, to the south. Arcade Road connects Beach Road in the east to Clifton Road in the west, while The Arcade is pedestrianised. Given the qualitative factors of both The Arcade and Arcade Road, is considered unsuitable for vehicles to safely and appropriately access the site in accordance with the operational requirements of the proposed drive-thru unit.</p> <p>The car parking provision at the Site is inadequate. The unit provides no suitable retail parking, with the nearest car parks being Manor House car park to the east and the Anchor Springs car park to the north. In addition, both car parks are likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <b>Summary</b> | <p>The Former Fireside Bookshop is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

## The Arcade, Littlehampton



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| <b>Site Area / Floorspace</b> | Unknown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Description</b>            | <p>The unit is an 'in-line' retail unit, located fronting The Arcade and Littlehampton. The immediate surrounding area is primarily retail, with residential units to the north-east and south.</p> <p>The Site benefits from prominent street frontage and retail signage. The existing property is a ground floor commercial unit (Class E) and consideration should be given to the large footfall expected to and from the High Street in the north.</p> <p>As per the Arun District Council Local Plan, the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Primary Shopping Frontage'.</p> <p>Manor House car park lies approximately 70m north-east of the Site, while the Anchor Springs car park is located approximately 74m north of the Site.</p> |
| <b>Availability</b>           | <p>Following a site visit in November 2021 it is understood the site is vacant.</p> <p>No marketing information is available online and it is unclear whether the unit is being marketed for lease. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Suitability</b>            | <p>The unit is located on the ground floor of a mixed-use retail arcade. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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|                | <p>The unit is located along a Primary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit forms part of a retail arcade, and is bound on all sides by existing retail uses. Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail spaces within the town centre boundary.</p> <p>The unit fronts the pedestrianised zone of The Arcade and it is therefore considered unsuitable for vehicles to safely and appropriately access the site in accordance with the operational requirements of the proposed drive-thru unit. In addition, given its location, the unit is not visible from the surrounding transport network and would therefore not successfully capture passing trade, in line with the operational requirements of the proposed end-user.</p> <p>The car parking provision at the Site is inadequate. The unit provides no suitable retail parking, with the nearest car parks being Manor House car park to the east and the Anchor Springs car park to the north. In addition, both car parks are likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <b>Summary</b> | <p>The unit is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

## Former Little Luxury, Beach Road, Littlehampton



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| <b>Site Area / Floorspace</b> | Unknown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Description</b>            | <p>The unit is an 'in-line' retail unit, fronting Beach Road (the B2140), Littlehampton. The immediate surrounding area is largely mixed in nature, with retail uses to the north and north-west, and residential uses to the south.</p> <p>The Site benefits from prominent street frontage and retail signage. It is understood the unit was previously in use as 'Little Luxury' (Class E). Beach Road is the main north-south through route from the High Street in the north and towards the coast, to the south. Consideration should be given to the large footfall vehicular movement along Beach Road.</p> <p>As per the Arun District Council Local Plan, the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Secondary Shopping Frontage'.</p> <p>Manor House car park lies approximately 42m north-east of the Site, while the Anchor Springs car park is located approximately 170m north-west of the Site.</p> |
| <b>Availability</b>           | <p>Following a site visit in November 2021 it is understood the site is vacant.</p> <p>No marketing information is available online and it is unclear whether the unit is being marketed for lease. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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| <p><b>Suitability</b></p> | <p>The unit is located on the ground floor of a mixed-use building. DWD are unable to confirm the total vacant floorspace (sqm).</p> <p>The unit is located along a Secondary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit is considered an in-line retail unit and is bound to the north and south by existing retail properties. Therefore, in providing a sufficient drive-thru route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail spaces within the town centre boundary.</p> <p>The unit fronts Beach Road (the B2140), and this is considered to be a main north-south through-route from East Street / High Street in the north and the coast, in the south. Therefore, the unit is visible from the surrounding transport network and could successfully capture passing trade.</p> <p>In any means, the Site is unsuitable for the operational requirements of the application proposal in regards to location (above) and car parking provision.</p> <p>The car parking provision at the Site is inadequate. The unit provides no suitable retail parking, with the nearest car parks being Manor House car park to the east and the Anchor Springs car park to the north. In addition, both car parks are likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <p><b>Summary</b></p>     | <p>The Former Little Luxury is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

## Former Chaz Care Agency, Church Street, Littlehampton



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| <b>Site Area / Floorspace</b> | Unknown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Description</b>            | <p>The unit is a ground floor commercial unit fronting Church Street, Littlehampton. The immediate surrounding area is largely mixed in nature, with retail uses to the south and west, and residential uses to the north and east. The unit benefits from prominent street frontage and retail signage. It is understood the unit was previously 'Chaz Care Agency'.</p> <p>As per the Arun District Council Local Plan, the Site is located within the Economic Growth Area, Town Centre Boundary and is designated along a 'Secondary Shopping Frontage'.</p> <p>Anchor Springs car park lies approximately 23m west of the Site, while the St Martins car park is approximately 135m west of the Site.</p> |
| <b>Availability</b>           | <p>Following a site visit in November 2021 it is understood the site is vacant.</p> <p>No marketing information is available online and it is unclear whether the unit is being marketed for lease. DWD are unable to confirm the total vacant floorspace (sqm).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Suitability</b>            | <p>The unit is located on the ground floor of a mixed-use building. DWD are unable to confirm the total vacant floorspace (sqm).</p> <p>The unit is located along a Secondary Shopping Frontage and therefore a retail unit would be acceptable, in principle. However, the unit is part of a mixed-use building which also homes the Upper Crust takeaway.</p>                                                                                                                                                                                                                                                                                                                                                |

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|                | <p>The property is further bound by retail units to the south. Therefore, in providing a sufficient drive-thru facility and route at this location, this would include developing on land outside the unit's ownership and would result in the loss of existing retail spaces within the town centre boundary.</p> <p>The unit fronts Church Road and is visible from the surrounding transport network, and could successfully capture passing trade.</p> <p>By any means, the unit is considered unsuitable for the operational requirements of the end user given the lack of parking spaces available.</p> <p>The car parking provision at the Site is inadequate. The unit provides no suitable retail parking, with the nearest car parks being the Anchor Springs and St Martins car parks to the west. In addition, both car parks are likely to be extremely busy at peak customer hours which would mean that the availability of the total number of spaces required for the proposal could not be guaranteed.</p> <p>In any event, the existing site is clearly unsuitable for the operational requirements of the application proposals, even on a flexible basis.</p> |
| <b>Summary</b> | <p>Former Chaz Car Agency is currently vacant and could be considered to be available for the purpose of the sequential test.</p> <p>However, as set out above the vacant unit would not satisfy the operational requirements of the tenants who would occupy the application, in terms of location, servicing and facilities to support a drive-thru unit. DWD concludes the unit is not a suitable or viable alternative to the application site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |