Our Ref: Adur Planning 15-12-13

Adur & Worthing Councils
Development Management
Economy Directorate
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS

MORRIS MODELS
NORTH LANCING

(incorporating J Morris of North Lancing and Models and Hobbies formerly of Steyning)

80 Manor Rd, North Lancing, West Sussex BN15 0HD
Tel & Fax: 01903 754850
E-mail: info@modelsandhobbies .co.uk
www.modelsandhobbies.co.uk

13th December 2015

Dear Sirs,

Planning Application Ref NOTICE/0028/15
86 Manor Road, Lancing
Change of Use (Class A1 to Class C3)

I am writing to object to the recently advised application for change of use from Class A1 (Retail) to Class C3 (Residential). Your letter of notification indicates that you consider this change of use to be "Permitted Development" and therefore does not require full planning permission. "Comments" are, however, invited.

The basis of my objection is in three parts:

1) Change of use from Class A1 retail to Residential (C3) is not a matter which should be considered as a "Permitted Development" but should be the subject of a full planning application.

2) If considered as a full planning application, then such change of use would appear to be against the Adur Plan 2014 in relation to the loss of employment and retail opportunity and therefore should be refused on those grounds.

3) Such a change of use would make similar future developments difficult to resist and destroy the local community asset which presently exists and is valued by the community.

In detail, I would comment as follows:

1) My understanding was that the purpose of "Permitted Development" rights was to free up Town Planning Departments to concentrate on major developments, without being "distracted" by many small applications related to developments of existing private dwellings retained in the same use. It was intended to short cut the procedure with regard to relatively minor changes – subject to certain restrictions and exceptions. My understanding was that it did not apply with regard to any "change of use" applications. This would be supported by the following:

   Quote from "Planning Portal" website : "NOTE: *Houses created through permitted development rights to change use from shops, financial and professional services*

premises or agricultural buildings cannot use householder permitted development rights to improve, alter or extend homes: ***planning permission is required****."*

2) The Adur Plan 2014 makes the point that:

Although B class activities are traditionally vital to the local economy, other employment generating uses such as retail, leisure and service industries make a significant contribution to the economy. These will be focussed in town centres and other locations within the Built Up Area Boundary. (para 2.43).

The change of use of this property would see a loss of employment opportunity and would be contradictory to this stated policy.

Policy 26 also states that:

"the conversion or redevelopment of land or buildings, currently or last in class B1, B2 or B8, for other uses will be resisted unless it can be satisfactorily demonstrated that the site or premises is/are genuinely redundant".

Whilst this development relates to retail rather than Class B, the intention is clear that the loss of employment opportunities is taken seriously and should not be left solely to a Permitted Development status, but a full application should be considered.

This particular property was trading as a butchers until the end of August 2015, and no marketing (by means of advertising board) has been seen on the property since, so it cannot be said that any serious effort has been made by the property owner to seek alternative owners wishing to retain it for activities offering employment.

Policy 28 relating to local shopping parades states:

"In the areas designated as local shopping parades, a predominant shopping use (as defined in the Town and Country Planning (Use Classes) Order 1987 as amended) on ground floor premises will be retained. Where proposals would result in a dominance of non-retail uses, this will only be acceptable where it can be demonstrated that retailing is no longer a viable use in that unit, particularly where it has remained vacant for a long period (normally a minimum of one year) and that reasonable attempts have been made to market it for retail purposes."

As mentioned above, this property has been empty for less than four months. My understanding is that this policy is meant to give guidance for the consideration of full Planning Applications. If Change of Use is considered so significant, this proposal should not be considered appropriate for an automatic "permitted development" approval. There is also the likelihood that such an application would also be rejected as being contrary to the Local Plan.

3) Community Asset.

Although just outside the conservation area of North Lancing there is a local community who value this local parade of shops. It is one of only two serving the area of Lancing and Sompting north of the A27, a road which isolates this area from the main heart of the town. The fact that the parade is valued was demonstrated by the local volunteer community support to improve the environment of the parking area in front of the shops during 2015, physical support being also given by our local MP, Tim Loughton. To grant an application for this change of use to housing would send a message that this parade was no longer considered a community asset and make it virtually impossible to resist similar future applications.

It is seen in many other cases that once local shopping parades lose any of their retail units, the effect is detrimental on the remaining businesses inevitably leading to the eventual loss of the local parade for retail purposes entirely. Such a decision should be made at a strategic community level with any future Local Plan revisions, and not by default of individual planning applications.

I would therefore ask you to reverse your decision to consider this as "Permitted Development", and also note my objections should consideration be given to a full planning application for change of use development for the reasons detailed above.

Yours sincerely

Brian Jackson
Morris Models