T.P. OFFICE COPY



SUPPLEMENTARY STATEMENT IN SUPPORT OF APPLICATION FOR PLANNING PERMISSION



PROPOSED CONVERSION AND REFURBISHMENT OF OBSOLETE OFFICE BUILDING FOR RETAIL AND CONTINUED OFFICE USE

ON LAND AT

THE CAUSEWAY, DURRINGTON

WORTHING, WEST SUSSEX

WORTHING BOROUGH COUNCIL
25 JUN 2010
CONSENT GRANTED
SUBJECT TO CONDITIONS

BOROUGH OF WORTHING
DEPOSITED 16 12 08
TP REF No.
WB/ 08/0851/Full

December 2008

RHPC

CANTIUM DEVELOPMENTS

LAND AT

THE CAUSEWAY, DURRINGTON

WORTHING, WEST SUSSEX

PROPOSED CONVERSION AND REFURBISHMENT OF OBSOLETE OFFICE BUILDING FOR RETAIL AND CONTINUED OFFICE USE

SUPPLEMENTARY PLANNING STATEMENT

ON BEHALF OF

CANTIUM (DURRINGTON) LTD

AND

PAVF SECOND NOMINEES 10 LTD

December 2008

Rob Huntley Planning Consultancy

Stratfield House
265 High Street
Crowthorne
Berks
RG45 7QW

Tel • 01344 769259
Fax • 01344 769259
email • rob.huntley@talk21.com

CONTENTS

SECTION		PAGE
1	INTRODUCTION	1
2	CONTEXT	2
3	THE STRUCTURE PLAN	4
4	NATIONAL POLICY –PPS6	6
5	RESPONSE TO REPRESENTATIONS	9
6	USES AND POTENTIAL SUBDIVISION	15
7	BENEFITS	17
8	CONCLUSION	19

APPENDICES

1	POTENTIAL FOR ACCOMMODATING SMALLER SPACE USERS
1(a)	LETTER FROM CLUTTONS
1(b)	LETTER FROM HNW ARCHITECTS & PLAN
2	AUTOTRACK DRAWING OF DELIVERY VEHICLE MANOEUVRE
3	DRAFT S106 PLANNING OBLIGATION

1.0 INTRODUCTION

1.1 This application relates to a two storey office building at The Causeway, Durrington. The building is shortly to become vacant as a result of the relocation of the current occupier, Equiniti. Cantium (Durrington) Ltd and PAVF Second Nominees 10 Ltd propose to refurbish the building and convert the ground floor to retail accommodation and associated purposes.

1.2 This document provides additional material and clarification of the proposed development in response to requests by Worthing Borough Council and in response to representations made on the application.

2.0 CONTEXT

2.1 The office accommodation at The Causeway is to be vacated by Equiniti in January 2009. Substantial works of repair, refurbishment and alteration are required once the buildings become vacant to enable there to be any prospect of them being able to be re-occupied.

2.2 At present the adjoining and interconnected office tower has no independent entrance. A scheme to create a high quality independent entrance has been prepared and planning permission has been granted to achieve this. Refurbishment of the accommodation and renewal of the building services (heating, ventilation, lighting, power etc) is an integral part of these works. The owners of the building are ready to let a contract for this work so as to ensure that the office tower can continue to form part of the stock of office accommodation available to the Worthing market.

2.3 The two-storey building which is the subject of this planning application is incapable of reuse for any realistic purpose without substantial work of a structural, functional and aesthetic nature. Improvements to its accessibility, repairs to the building fabric and renewal of building services are necessary to enable the continued beneficial use of any of the floorspace. The building was designed initially for the specific requirements of Lloyds and originally included a banking hall on the ground floor. In more recent times it has been used as a bulk mail processing centre associated with the Lloyds Registrars business and latterly for the same use by Equiniti who have continued the same business.

2.4 The large footplate of the building and the poor levels of natural light mean that the ground floor accommodation is not suitable, even with any works of alteration, to be used for office purposes. Indeed, as stated above, it was never designed or constructed for such use but for a bespoke role suited to the original Lloyds banking and registrars activities. The implications of these factors are that without substantial remodelling of the accommodation in both buildings, plus repairs and refurbishment, the substantial office elements within the buildings will remain unused once Equiniti vacate the premises. The site as a whole would then not make any contribution to the pool of available and usable employment accommodation.

2.5 Once the buildings are unoccupied, and with no realistic prospect of reoccupation, the empty rates liability that will arise on the owners means that it is likely that the buildings would be demolished and the site left vacant. This would not be conducive to supporting the vitality and viability of The Strand local centre, and it would be inconsistent with the Council's objective of fostering regeneration and renewal and would detract from the visual appearance of the locality.

2.6 In order to create the commercial climate whereby substantial expenditure can be committed to works to the office tower to permit its reoccupation, it is necessary to enable the two-storey building to be re-occupied for beneficial purposes.

2.7 It is against this context that the Council has requested that further material be provided in relation to the following matters: –

- The provisions of policy NE5 of the Structure Plan;
- Clarification of retail "need" and "impact" in relation to the current (but soon to be replaced) guidance in PPS6;
- Details of a mechanism that would facilitate reoccupation of the adjacent office tower (section 106 planning obligation);
- An explanation of any access or other constraints affecting the potential to subdivide the ground floor for occupation by smaller space users.

2.8 The remainder of this report addresses these matters. It also responds to the representations that have been made on behalf of the Co-op and Field Place Area Residents Association.

3.0 THE STRUCTURE PLAN

3.1 The West Sussex structure plan provides, until the adoption of the South East Plan, a strategic framework to guide development in the County. Of particular relevance to this application are policies NE5 and NE10. These continue in effect notwithstanding that other policies of the Structure Plan have not been "saved".

3.2 Policy NE5 seeks to balance the provision of employment land and premises to meet the needs of business and the community. Its principal objectives are to: –

- Resist the loss of employment land or allocations which are important to maintaining the supply of jobs and premises in the area;
- Manage the release of employment land to achieve the levels of employment development set out elsewhere in the structure plan;
- Secure an appropriate mix of types and sizes of premises;
- Safeguard land and premises which make an important contribution to the supply of premises and jobs.

3.3 The text in paragraph 148 of the structure plan makes clear that in respect of premises which are *"... unsuited to business needs, their redevelopment for a new use, for example housing, should be considered."* The circumstances at The Causeway are that the ground floor of the two-storey building was designed and constructed for a very specific mix of banking hall and share certificate/post handling activities, it was never intended to be occupied as offices and in all senses it is not suitable for or attractive to office occupiers. The accommodation was constructed specifically for a particular requirement which will longer exist following the current tenant's planned departure in January 2009.

3.4 The reuse of the ground floor of the building for retail purposes will act as an economic catalyst to facilitate the reoccupation of the first floor of the building and the office tower adjacent for continued employment purposes. Without securing a beneficial use for the ground floor not only will that accommodation cease to make any contribution to local employment, but neither will the first floor nor the office tower be able to do so for economic viability.

3.5 Retail or similar use of the ground floor will itself create employment. Without such reuse there would be no commercial viability and therefore no employment on the site. In this way, permitting the ground floor to be reoccupied for retail or similar

purposes will positively encourage the maintenance of substantial levels of employment in the locality and will not result in any "loss".

3.6 The proposed retail or similar use envisaged in this application for planning permission would support and be consistent with the objectives of policy NE5 of the structure plan, and would not at all be in conflict with them.

3.7 Policy NE10 of the structure plan envisages retail development within existing centres, including local centres such as The Strand. It provides that retail development outside such centres may be permitted where it would meet the needs of the local community and would not undermine the vitality, viability and retail function of the centre. It also envisages the provision of local shops where these would provide for to the identified needs of the local community. The policy also provides for additional retail development in strategic locations especially as part of a mixed development.

3.8 The Strand local centre provides an essentially local service to the surrounding community. The extent to which it (and other local centres in Worthing) can perform this function is limited by the predominantly very small size of units which comprise the local centre. This, and the dominance of large and more remote out of centre stores (which account for over 68% of convenience spending in the town) means that The Strand is not able to perform this local service function adequately.

3.9 Making provision, as an adjunct to The Strand local centre, for premises able to accommodate a somewhat larger store (but still small by comparison with the dominant out of centre stores) will encourage a greater proportion of local expenditure to be retained locally. This will reduce the length of shopping trips, encourage expenditure in the small and complimentary shops within the local centre and assist in redressing the current imbalance whereby local centres account for a disproportionately small component of local retail spending.

3.10 The use of the ground floor of the two-storey building for retail and associated purposes would accord with the objectives set out in policy NE10 of the structure plan.

4.0 NATIONAL POLICY - PPS6

4.1 The detailed supporting statement submitted with the application for planning permission addressed national policy set out in PPS6. It included, in Appendix 3, a detailed assessment of the impact of the proposed development. This assessment of impact included consideration of a range of factors in addition to those envisaged in the current version of PPS6 which was issued in 2005. However, the assessment included consideration of levels of expenditure and turnover.

4.2 The current version of PPS6 was issued in 2005. The government has made clear that this requires review and updating. A consultation draft of a replacement for PPS6 was published in July 2008. This makes clear that assessment of "impact" should include considerations of consumer choice, retail diversity, the promotion of competition, the scope for regeneration and job creation. In the current economic climate the ability of local authorities to have regard to these matters will be all the more important in supporting the well-being of local communities and promoting the vitality and viability of local centres which lie at their heart. Applying, inflexibly, the approach of the unrevised current version of PPS6 would run completely counter to this.

4.3 The emerging version of PPS6 advocates that this wider range of considerations should replace the blunt and simplistic "needs test" which is the main focus of the "old style" PPS6 assessment. The "needs test" essentially involves a crude comparison of theoretically derived retail expenditure with an equally theoretical calculation of potential turnover. The comparison of these two figures gives a measure of "retail capacity". If the turnover is less than the expenditure there is said to be "capacity" to accommodate additional retail floorspace, but if the reverse is the case there is said to be an excess of retail provision and no "capacity" to accommodate further retail provision.

4.4 This crude approach is recognised as having given rise to unintended consequences, including stifling diversity, limiting consumer choice and inhibiting beneficial regeneration and renewal. This earlier approach had led to some new retail schemes which could benefit a particular centre, being ruled out because out of town developments already met the "need" as assessed in crude expenditure terms.

4.5 The position in Worthing exemplifies the anomalies that the new approach set out in the July 2008 version of PPS6 seeks to address. The overwhelming majority (68%) of convenience goods spending in Worthing takes place in out of centre stores. This figure is disproportionately high when measured against comparable towns and acts to the detriment of the district and local centres within the town, which have a large number (in excess of 180) of mainly small retail units. They perform a valuable local function for their immediately surrounding residential areas and are particularly conducive to reducing the need to travel as a high proportion of customers walk to these centres. However, the unusually high level of leakage of retail spend from these traditional convenience locations points towards a worrying imbalance at the local level.

4.6 Although the July 2008 version of PPS6 is not yet formally adopted as a policy statement, it is clear from the Secretary of State's announcement on its publication, that it better reflects Government policy than the 2005 version of PPS6. Nevertheless, as the existing and unrevised PPS6 remains in force, the Council has asked that further consideration be given to "need" as interpreted under the outdated 2005 version of PPS6.

4.7 It is clear that assessed against a crude measure of "need", derived from a simplistic comparison of assumed expenditure with theoretical turnover, there is no "capacity" for any further retail provision in the Borough, no matter how beneficial that would be. However, such theoretical calculations produce spurious results. For example, on such an approach there would appear to be justification for a policy approach which sought a significant reduction in existing retail provision. This would clearly be wholly inappropriate and would have undesirable consequences, not least by potentially reducing the contribution that local centres make to serving their immediate catchments in a sustainable way.

4.8 It is, at least in part, for this reason that government policy is being reviewed to require a more integrated approach to consideration of the need for and impact of retail provision. That is the approach that has been adopted in assessing the modest scale of additional retail provision proposed in this application.

4.9 Local centres in Worthing are underperforming. The town centre accounts for a very small proportion of convenience spending in the town. The overwhelming

dominance of large and more remotely located out of centre stores (68% of turnover) is not conducive to the creation of a sustainable pattern of retailing. Local centres, which by definition lie at the heart of their local communities, are the appropriate focus for the modest scale of retail provision proposed at The Causeway.

4.10 Of potential sites within or adjacent to The Strand local centre only the site at The Causeway is available and suitable to accommodate retail development. The retail function that the proposed accommodation would meet, being essentially local in character, can clearly not be located in or adjacent to a different and more remote centre. To seek to do so would not address the local market. Nor would accommodating the provision in the town centre. Either option would be contrary to the aim of reducing travel distances for shopping trips.

4.11 Paragraph 2.9 of the 2005 version of PPS6, in referring to the hierarchy of centres makes clear the objectives of ensuring that:-

- people's everyday needs are met at the local level;
- consideration is given to the need for investment and growth to strengthen other centres, especially those needing regeneration.

These objectives specifically support the development proposed in this application.

5.0 RESPONSE TO REPRESENTATIONS

5.1 Representations against the proposed conversion of the ground floor of the building at The Causeway have been made in response to the planning application by the Field Place Residents Association and on behalf of the Co-op. The paragraphs below identify the main points made in these representations and set out the applicant's response and comments.

THE CO-OP

5.2 The Co-op's representations focus exclusively on the approach of the 2005 version of PPS6. They assert that measured against local expenditure, there is already an excess of floorspace capacity to accommodate retail turnover and that there is no "need" for any additional floorspace. This is an inappropriate basis on which to approach the assessment. The emerging policy revisions to PPS6 seek specifically to address the somewhat simplistic and potentially damaging approach of the 2005 version of PPS6 and would also encompass the ability to have greater regard for the employment retention and regeneration objectives of the structure and local plans.

5.3 The Co-op's representations suggest that in terms of convenience expenditure, there is an "excess" of provision already of over £25 million as at 2005, reducing to £15 million as at 2009. Clearly if there was already an excess of provision as against expenditure available then the market would correct this by reducing capacity, leading to large scale store closures. This has not occurred and this alone is evidence that the crude capacity approach which is the basis of the 2005 version of PPS6 does not provide an appropriate guide to the application of policy and the achievement of broader objectives.

5.4 It is also suggested on behalf of the Co-op that the 2006 appeal decision relating to the Asda proposal on the college site provides support for resistance to this proposal. However, the proposed Asda store was over 4 times the floorspace of that proposed in this application. It was on a site which is not well connected to the existing Strand local centre (over 150m distant and across a busy road). The proximity of the present application site to the defined boundary off the local centre (immediately abutting it), its accessibility in relation to public transport and to

facilitate linked trips, and the much more limited scale of the proposal all serve to demonstrate that the approach which was rightly adopted to the Asda scheme, and which led to that appeal being dismissed, is not a sound or appropriate basis against which to assess the current much more modest and complimentary proposals at The Causeway.

5.5 The Co-op's representations are also critical of the proposals in terms of scale in comparison with the existing retail floorspace within The Strand centre. It suggests that the retail floorspace proposed is "*almost double the current floorspace of the existing centre*".. This is not correct. In fact what is proposed is less than 75% of what presently exists, not almost 200%.

5.6 The suggestion is made that there would be a damaging level of diversion of trade away from existing small shops within the local centre. This reveals a misunderstanding of the present trading position and the contribution that the proposed retail provision would make. Apart from the Co-op, which comprises an amalgamation of several small units, the whole of the local centre comprises very small shops. It is this pattern that is a fundamental cause of the limited attractiveness of The Strand as a local centre. In turn, this encourages locally generated expenditure to be diverted to larger stores further away from the local community. The introduction of the ability to accommodate a larger operator would add to the attractiveness of The Strand as a whole. This would be likely to benefit the existing range of small unit shops by increasing the proportion of custom that would be retained from the surrounding local community.

5.7 There may be scope, depending on the nature of the potential occupiers of the retail accommodation to be provided, for the existing Co-op store in Field Place Parade to experience competition. This could potentially affect the turnover at that store. However planning policy, including that in PPS6, is not concerned to inhibit commercial competition. Indeed, it is clear that both the 2005 version and the emerging replacement encourage the provision of choice and competition. Potential reduction in trade at the Co-op, which it is clear forms the basis of the Co-op's representations, is not a sound or proper basis for seeking to resist the proposed development.

FIELD PLACE AREA RESIDENTS ASSOCIATION

5.8 In their representations, the Field Place Area Residents Association make three principal points. They assert that the proposed development would be objectionable because:-

- The development could blight the area;
- There would be an adverse retail impact on the local centre;
- There would be insufficient parking, leading to congestion.

The paragraphs below respond to these points.

"Blight"

5.9 The Association suggests that comparison of the supporting statements submitted in connection with the current application and that related to the earlier (undetermined) application, which included residential accommodation, represents a "change of policy" by the applicants. This is not the case. The position remains that without substantial value creating development, finance to facilitate the reoccupation of any of the office accommodation is unlikely to be available. This position has been exacerbated by recent global financial market weakness.

5.10 The first application envisaged the creation of value by including residential accommodation on the site. Since then, for reasons outside the control of the applicant, the ability to support the level of investment required no longer exists due to extreme weakness in the residential sectors. The requirement for the site to be beneficially used remains however. A lower cost option, which retains comparable retail benefits and which would facilitate reoccupation of otherwise obsolete accommodation at the Causeway for continued office use, can be implemented in the short term.

5.11 The Association, correctly, points out that with the office accommodation becoming vacant it is likely that there will be a reduction in the level of trade at local shops and service outlets, and that this will be detrimental to the vitality and viability of the local centre. Given that there is no prospect of reoccupation of the office accommodation without substantial and costly works of refurbishment, adaptation and repair, a "do nothing" scenario is both unrealistic and counterproductive. The increase in activity which would be brought about by reoccupation of the office accommodation and trade associated with the proposed retail floorspace would

reverse the reduction in trade which would otherwise inevitably be experienced. Indeed as the number of employees within the office accommodation has reduced in recent months this reduction in trade is already apparent. It will only get worse unless positive action is taken to address the cause of this.

Retail Impact

5.12 The association suggests that the current proposal raises the same considerations as led to the dismissal of the Asda appeal in 2006. The reasons why this is not the case set are out above. What is proposed at the Causeway is a scale of retail development which is wholly consistent with the operation of local retail and service meeting the needs of its local community. The previously proposed development by Asda was, by contrast, a wholly different concept, and divorced from the existing established local centre.

5.13 The association makes reference to "footfall". However, the numbers quoted by the Association are substantially wide of the mark. The calculation of footfall available to a new food store is clearly a crucial element that would be considered by any potential occupier. Initial discussions have been held with potential occupiers who have satisfied themselves that a sufficient level of custom is likely to be available to support their operation. If they did not believe that would be the case they would not have expressed interest in securing a representation within The Strand local centre. Potential operators at the site, which could include a discount food store, estimate that a store would attract between 6,000 and 10,000 people per week. More shopper visits will generate customers for other shops and services within The Strand local centre.

5.14 Local retail agents consider that a redevelopment of the Threshers store is extremely unlikely. Threshers, like many other national multiple retailers, have been closing stores all over the country due to poor retailing and the loss of trade to competitors. This is symptomatic of the economies of scale of neighbourhood retailing for the major retailers. The provision of additional retail accommodation within The Strand local centre would increase its attraction to customers, which in turn would be likely to increases in customer visits to other unit shops, supporting their viability rather than undermining it.

Transport and Parking

5.15 The Association has expressed scepticism over the analysis of transport and parking aspects included in the material submitted with the application. In response it is appropriate to make the following comments.

5.16 The Transport Report has been reviewed by the Highway Authority, West Sussex County Council. The only areas where additional information was sought by the County Council were:-

- further clarification on the 20% car driver assumption to the store;
- service vehicle manoeuvring provision.

The clarifications requested have been provided to, and it is understood accepted by, the Highway Authority.

5.17 The estimate of parking numbers presented in the Transport report (50-60 vehicles) includes The Causeway carriageway and the spaces in front of Field Parade itself. The estimate is that 40 cars can fairly comfortably park on The Causeway, with a further 10 accommodated in a "tighter" arrangement. The additional 10 in front of Field Parade brings the total to the estimate of 50-60 set out in the supporting material.

5.18 Goods Vehicle unloading will have no impact on the number of available parking spaces. The "swept path" of delivery vehicles has been specified in the submitted material and this demonstrates that there would be no infringement on the areas where vehicles can park. The actual position where deliveries would take place remains unchanged from the present arrangement, which involves the reuse of the existing bespoke off-carriageway service bay. This manouevre, shown on the drawing at Appendix 2, involves the delivery vehicle reversing into the existing service bay. This manoeuvre, which can be undertaken by both articulated and rigid delivery vehicles, has been safely undertaken as part of the current site operation for many years. The drawing at Appendix 2 illustrates the manoeuvre by both types of vehicle.

5.19 The Association expresses the opinion that the proposed retail accommodation would give rise to a substantial additional demand for parking and that congestion would result. The availability of parking for use by retail, office and local residential

users is explained in paragraphs 6.16 and 8.4 of the submitted Transport Report. The Highway Authority has reviewed this information and has not made any adverse comment on this aspect. Indeed, the County Council's comment is that "any on-street parking that does occur is likely to be short term and is unlikely to result in any highway safety concerns".

5.20 A test of the sensitivity of the assumptions adopted on the proportion of customers who would drive has been undertaken and the results provided to the County Council. This assumed an unrealistically high proportion of 50% car drivers so as to robustly test a "worst case" scenario. This resulted in 608 vehicles in a 12 hour day. On this basis it is clear that the Association's assumption of 1400 vehicles is a gross overestimate.

6.0 USES AND POTENTIAL SUBDIVISION

6.1 The drawings forming part of the application for planning permission indicate that the ground floor accommodation would be divided into two units, together with the provision of access to the upper floor. The smaller of the two units would be 180 square metres and the larger would extend to 995 square metres in total, of which approximately one third would be storage space. The Council has requested clarification of the potential for subdividing this into smaller units and whether uses other than retail could be accommodated.

6.2 The ability to divide the accommodation into more than two units, or to significantly adjust the size of these is constrained by physical limitations imposed by the structure and configuration of the building, and by operational considerations. Attached at Appendix 1 are letters from Cluttons Tod Miller (1(a)) and HNW Architects (1(b)). These letters explain the nature of these limitations and make clear that there is no realistic opportunity for the ground floor accommodation to be divided into a larger number of units. The requirement to ensure the maintenance of an independent access to the first floor to allow that to be re-occupied for office or similar purposes limits the ability to alter the balance of sizes of the two units. The practical considerations arising from the consideration of the building are graphically illustrated in the annotated drawing attached to the HNW Architects letter included within Appendix 1(b).

6.3 There is the potential for the units created to be occupied for purposes other than A1 retail accommodation. Uses which could be appropriate would be those which have similar locational and access requirements. These would include A2 (financial and professional services), A3 (food and drink) and potentially some types of leisure use. The ground floor of the building was previously partly devoted to a banking hall, which is a use within class A2 of the use classes order and which is appropriate in a retail context. An A3 use such as a café/coffee bar could also satisfactorily be accommodated.

6.4 Potential A2 and A3 uses give rise to no different design considerations than those which arise in relation to retail use. These matters are addressed in detail in the Design and Access Statement previously submitted in connection with the application. The principal considerations in this respect are outlined below.

6.5 As a result of the ground floor level of the building being some 800mm above pavement level, the position of the existing access steps and ramp (which requires to be extended for current Disability Discrimination Act compliance) remains the only available pedestrian access point to The Causeway, regardless of use.

6.6 Similarly the vehicular servicing arrangement which currently exist to the northern façade is the only practical location for such arrangements. This would therefore remain the same for any eventual use of the ground floor in view of the physical constraints and configuration of the building.

6.7 Finally any of these identified uses would depend on the larger of the identified spaces remaining undivided in view of the impracticality of sub-division arising principally from the two main points described above, together with the disposition of structural columns interrupting the floorspace.

6.8 Some forms of leisure use could potentially be accommodated within the building. It seems unlikely that entertainment or assembly type uses would be appropriate, but a health and fitness studio occupying part of the floorspace could be a potential possibility depending on market demand.

7.0 BENEFITS

7.1 The existing office accommodation at The Causeway (both within the tower and the first floor of two-storey building) will become vacant imminently. There is no realistic possibility of this space being be occupied without substantial and expensive works being undertaken. For the reasons previously given there is no realistic likelihood of the ground floor accommodation within the two storey building being occupied as offices, irrespective of what works might be undertaken to it.

7.2 With the buildings becoming vacant they will inevitably be an adverse impact on the level of trade within The Strand local centre. Reoccupation of the existing office accommodation, constituting the majority of the available floorspace, for continued office purposes would be beneficial to the local economy generally as well as to the trading success of the local centre.

7.3 The ground floor of the two-storey building is not realistically likely to be reoccupied for office or similar purposes. The investment required to permit reoccupation of the remaining office space can only be justified if an economic and viable use can be found for the ground floor space.

7.4 The applicants have prepared a scheme for the alterations and refurbishment required to facilitate reoccupation of the office tower. This already has planning permission and has been approved by the Council. The applicants are willing to commit to putting this work in hand prior to the occupation of any retail or similar accommodation within the ground floor of the application site. A draft of a planning obligation to give effect to this commitment is attached at Appendix 3. This would be a substantial benefit to the local area and to the provision of usable employment accommodation in Worthing.

7.5 The introduction of a retail frontage to The Causeway would bring about substantial visual, environmental and amenity benefits. These are described in more detail in the Design and Access and Planning Statements submitted with the application. The failure to secure a viable retail or associated use of the ground floor would result in, at best, both buildings remaining vacant and prone to deterioration and vandalism. A more likely outcome is however that the buildings would be

demolished and the site would be cleared, as demolition would be a more attractive prospect to incurring empty rates liability and associated running costs.

7.6 There would be benefits to the pattern of retail provision in the locality Incorporating a larger unit as an integral part of The Strand local centre would make the centre as a whole more attractive for locally-based expenditure, thereby reducing the amount of current retail "leakage" away from The Strand.

7.7 By retaining a greater proportion of retail expenditure in the local area the average length of retail trips would be reduced, a greater level of trade overall would be likely to benefit other smaller retail outlets within the centre, supporting the vitality and viability of the centre as a whole.

7.8 These substantial benefits would not be able to be achieved without planning permission being granted for the proposed use of the ground floor of the two-storey building for retail and/or associated purposes.

8.0 CONCLUSION

8.1 This statement responds to the specific additional requests that the Council has made for further explanation and clarification of aspects of the proposed development. It also responds to the representations made on behalf of the Co-op and the Field Place Parade Area Residents Association.

8.2 The vacation of the accommodation at The Causeway by a long established business presents significant challenges to the local economy of Worthing. These are exacerbated by the economic climate which is not conducive either to supporting investment in the renewal of the physical fabric or attracting replacement occupiers for the vacated office accommodation.

8.3 The Strand area is a location where it is appropriate to encourage renewal and regeneration comprising a mix of uses. The incorporation of a modest amount of retail accommodation on the ground floor of the building, which would otherwise not be likely to find a beneficial use, will bring benefits. These will be manifest in economic and visual terms and will contribute to the creation of a more sustainable pattern of retailing to serve the local community.

8.4 For these reasons planning permission should be granted for the development proposed in this application.

APPENDIX 1

POTENTIAL FOR SUBDIVISION OF FLOORSPACE

APPENDIX 1(a)

Letter from Cluttons Tod Miller

rectilinear nature, would create completely impractical, and from a retailers perspective unacceptable, corridor style units.

Furthermore any such sub-division would cause the loss of retail space at the rear due to the need to have to provide service corridors stretching from the remote loading area on the north side of the building.

In marketing terms the accommodation will be exposed to the general market and all interest will be considered. However, to derive an adequate return the maximum amount of useable floor area will need to be created and in a configuration that will meet the demanding requirements for easy and direct access, good visibility and window display that all professional retail and leisure operators require.

In practical and valuation terms therefore further sub-division is neither feasible nor viable.

Yours sincerely

R A Miller FRICS
Partner

APPENDIX 1

POTENTIAL FOR SUBDIVISION OF FLOORSPACE

APPENDIX 1(a)

Letter from Cluttons Tod Miller

Contact Bob Miller
Direct Dial 01903 831255
Email bob.miller@cluttons.com
Fax 01903 268548

Mr C. Boulter
Cantium Developments Limited
23 Farncombe Road
WORTHING, West Sussex
BN11 2AY

1 December 2008

Dear Chris

Proposed Retail, Office & Leisure Accommodation at The Causeway, Durrington

Following our recent meeting with Officers of Worthing Borough Council at Portland House you have asked me to comment on the potential for further division of the larger of the two units proposed as part of the overall project intended to retain and reuse the existing two storey former Lloyds Registrars banking hall and office building.

The space in question is on the southern and eastern sides of the central office entrance lobby and core which includes all that part of the ground floor of the building which was for many years operated by Lloyds as a banking branch serving the general locality.

It comprises approximately 10,000 sq ft of gross internal area of which approximately 2,500 is suitable for storage by virtue of its position hidden behind the office core and separate from the smaller retail unit by virtue of the goods scissor lift and loading area.

The remaining area of circa 7,500 sq ft is set back some 14' from the back edge of pavement and some 2'7" above pavement level.

Due to the central location of the entrance steps up to this level, which serve the existing centrally located office entrance and also the new accommodation proposed for either side thereof, coupled also with the need to retain the existing access ramp in front of the larger unit, there is only one feasible location for a retail entrance into that amount of space, and that is the entrance shown on the accompanying plan.

Because of the overhang of the first floor accommodation, it is essential for retailing purposes to bring the line of the shop front out to that of the existing column line, thus providing display space and trading frontage some 7' – 8' closer to the pavement, though still set back by the width of the access ramp, and at a higher level.

The crux of the problem of sub-division is that retailers require direct customer street access into their store and there is no feasible alternative option to provide that. A common internal lobby running across the front of the retail units would be unacceptable to a retail occupier as the units would have no visibility to the street .

The only theoretically practical division of the larger of the two proposed Units of accommodation could be down the column lines, however the depth of the built space that would be created by such a division, being in excess of 100' and of an elongated

APPENDIX 1(b)

Letter from HNW Architects

and annotated plan

Mr C Boulter
Cantium Developments LTD
23 Farncombe Road
Worthing
West Sussex
BN11 2AY

Our ref 08014/A1/KW/lf

05 December 2008

Dear Chris,

Proposed Retail, Office Accommodation at The Causeway, Durrington.

You have asked us to comment on the subject of the potential sub-division of the larger retail unit within this proposal. We consider this to be impractical for the following reasons:-

- Pedestrian access to the western retail frontage is severely restricted in view of the fact that the floor level is 800mm above adjacent ground level. This in turn defines the proposed entrances to the location dictated by the existing steps and ramps. There is insufficient space to accommodate further DDA compliant ramps.

- Servicing to the units is restricted to the northern face of the property served by an existing lift and staircase. Servicing to the rear (eastern face) to serve further units would be impractical in view of the restricted access (for vehicles) and location of the High Voltage enclosure and Low Voltage Switchroom.

- The location of the entrance to the first floor offices is dictated both by the requirements of fire travel distance and the need for viability/letting purposes to provide a Causeway frontage entrance.

- The narrow grid reinforced concrete frame of the building result in numerous columns at ground level which preclude practical linear subdivision.

- The storage area identified in the north east corner is dictated by the location of the goods in area and existing service core. It would be impractical to deploy this extent of floorspace denied retail frontage to serve smaller units.

In order to illustrate graphically the above points, we have attached one of the application drawings, the ground floor layout, annotated with the comments listed above.

Yours Sincerely

Ken Watson RIBA
Director
For HNW Architects

Enc.

PROPOSED TOWER
ALTERATIONS
GRANTED CONSENT
(REF. NO: WB/07/1539/FUL)
RETAIL UNIT
(To 1,708sqft)
STORAGE
OFFICE
(1st ENTRANCE LOBBY)
RETAIL UNIT
(To 1,540sqft)
GOODS IN
EXISTING SCISSOR LIFT
CUSTOMER CYCLES
EXISTING LAY-BY - 7 SHORT STAY PARKING SPACES
TROLLEY STORE
RECYCLING STORAGE
LV SWITCHROOM
HV
FIRE EXIT
Sub Station
UP
RAMP
PROPOSED GROUND FLOOR PLAN
NORTH AMPTON
PLANNING
THE CAUSEWAY, DURRINGTON
PROPOSED ALTERATIONS TO
ROPER LLOYDS 7SB PREMISES
RWK
1:100 @ A1
Dec 2008
PL10
080

APPENDIX 2

AUTOTRACK DRAWING OF DELIVERY VEHICLE MANOEUVRE

DTA DRAWING NUMBER 9127 - 22

APPENDIX 3

DRAFT SECTION 106 UNILATERAL UNDERTAKING

DATED 2009

DRAFT: 3-12-2008

PAVF Second Nominees 10 Limited
[FIRST OWNER]

AND

Cantium (Durrington) Limited
[SECOND OWNER]

TO

Worthing Borough Council

UNILATERAL UNDERTAKING
relating to the development of
land at

The Causeway, Durrington, West Sussex

THIS UNDERTAKING is given by DEED on **2009**

BY PAVF Second Nominees 10 Limited of .....[INSERT REGISTERED ADDRESS]..... ..... ["the First Owner"]

AND

Cantium (Durrington) Limited of .....[INSERT REGISTERED ADDRESS]..... ..... ["the Second Owner"]

TO Worthing Borough Council, of ("The Council")

WHEREAS

1. The Council is the local planning authority for the purpose of the Act for the Borough of Worthing in which the Application Site as hereinafter defined is situated
2. The First Owner and the Second Owner are the freehold owners of the Application Site
3. By a Deed dated ???????? the ????????????? of 200? Lloyds TSB PLC of PO Box 908 125 Colmore Row Birmingham B3 2DS ("the Mortgagee") is registered proprietor of the mortgage and has agreed to enter into this Deed in the manner appearing hereafter
4. On the 11 August 2008 application was made to the Council on behalf of the First Owner and the Second Owner ("the Planning Application") for planning permission to develop the Application Site
5. The Council allocated reference number 08/0851/FUL to the Planning Application
6. The obligations created by this Undertaking are conditional upon planning permission being granted ("the Planning Permission") by the Council in response to the Planning Application

NOW THIS DEED WITNESSES as follows:

1. DEFINITIONS AND INTERPRETATION

1.1 In this Deed the following words and expressions shall where the context so requires or admits have the following meanings:-

- The "Act" means the Town and Country Planning Act 1990
- The "Application Site" means all that land at The Causeway Durrington Worthing West Sussex shown for identification purposes only edged red on the Plan annexed to this Deed

- "Commencement of Development" means the carrying out on the Application Site of a material operation as defined in Section 56(4) of the Act pursuant to the Appeal Permission save that for the purpose of determining whether or not a material operation has been carried out there shall be disregarded such operations as ground surveys, fencing, archaeological investigations, the erection of temporary fencing and hoarding or such similar preparatory works including demolition works and "commence" and "commencement" shall be construed accordingly
- "the Development" means the development authorised by the Planning Permission
- The "Owners" shall mean the First Owner and the Second Owner jointly and severally
- The "Plan" means the plan annexed to this Deed marked 'Plan'
- the references to the parties named in this undertaking include their successors in title and assigns and in the case of the Council shall include any successor in function

2. STATUTORY PROVISIONS

2.1 This Planning Obligation by undertaking is made pursuant to section 106 of the Act section 111 of the Local Government Act 1972 and all other powers and enactments which may be relevant to the purpose of giving validity to this Deed or for facilitating the enforcement of the obligations contained in it to the intent that it will bind the Owner and its successors in title to each and every part of the Site and their assigns as provided in those powers and enactments

2.2 In this undertaking the covenants by the Owners as the freehold owners of the Application Site are in favour of the Council and constitute planning obligations for the purposes of Section 106 of the Act and shall be enforceable by the Council as the local planning authority in accordance with the provisions of Section 106 against the Owners and any person deriving title from the Owners

2.3 The obligations contained in and created by this Deed shall not take effect unless and until the Planning Permission shall have been issued and Commencement of Development shall have taken place

2.4 The obligations on the part of the Owners shall bind the Application Site and every part thereof provided that the obligations in this Deed shall not bind individual owners or occupiers or lessees of buildings constructed on the Application Site pursuant to the Planning Permission

2.5 No party shall be liable for breach of covenant or obligation contained in this Deed after the party has parted with all the party's interest in the Application Site or the

part in respect of which such breach occurs but without prejudice to liability for any subsisting breach of covenant or obligation arising prior to that party parting with such interest

2.6 No person who is not a party to this Deed ("third party") has or shall have any rights under the Contracts (Rights of Third Parties) Act 1999 to enforce any term under this Deed and no consent of any third party shall be required under that Act to any cancellation or variations of this Deed

2.7 In the event that

2.7.1 the Planning Permission shall expire before Commencement of Development or at any time shall be revoked or quashed or

2.7.2 the planning obligations referred to in this Deed are satisfied

then this Deed shall be deemed to be discharged and have no further effect

2.8 It is acknowledged by the Owners that this Undertaking may be registered as a local land charge in the Register of Local Land Charges maintained by the Council

3 COVENANTS BY THE OWNERS

3.1 The Owners covenant with the Council that they will serve written notice on the Council to inform them of the date of Commencement of Development within 7 days of such commencement

3.2 The Owners covenant with the Council that they will not permit the occupation for retail purposes of any part of the Application Site otherwise than in accordance with the covenants set out in the Schedule to this Deed

4 MORTGAGEE CONSENT

4.1 The Mortgagee acknowledges and declares that this Deed has been entered into by the First Owner and the Second Owner with its consent and that the Application Site shall be bound by the obligations contained in this Deed and that the security of the Mortgage over the site shall take effect subject to this Deed provided that the Mortgagee shall otherwise have no liability under this Deed unless it takes possession of the site in which case it will be bound by the obligations as if it were a person deriving title from the First Owner or the Second Owner

IN WITNESS whereof the parties have duly executed this instrument as a Deed the day and year first before written

EXECUTED AS A DEED by]
PAVF Second Nominees 10 Limited]
]
acting by:-]

Director

Director/Secretary

EXECUTED AS A DEED by]
Cantium (Durrington) Limited]
]
acting by:-]

Director

Director/Secretary

SIGNED AND DELIVERED AS A DEED]
FOR AND ON BEHALF OF]
Lloyds TSB PLC)]
Acting by its Attorney]
]
In the presence of]

SCHEDULE

1. The Owners covenant with the Council that no occupation for retail purposes of any part of the application site shall take place unless prior to such occupation a contract shall have been let to a competent contractor to undertake works of refurbishment and alteration to the Tower.

2. Such contract for works to the Tower shall include as a minimum the following items:-

    a) The separation of The Tower from the adjoining & presently intercommunicating Phase II building.

    b) The formation of the new ground floor entrance foyer & reception area to The Tower, to include related external works to provide the new parking, landscaping & entrance features, associated internal works, including the formation of new toilets & common areas.

    c) The procurement of requisite mains services & utilities into the building.

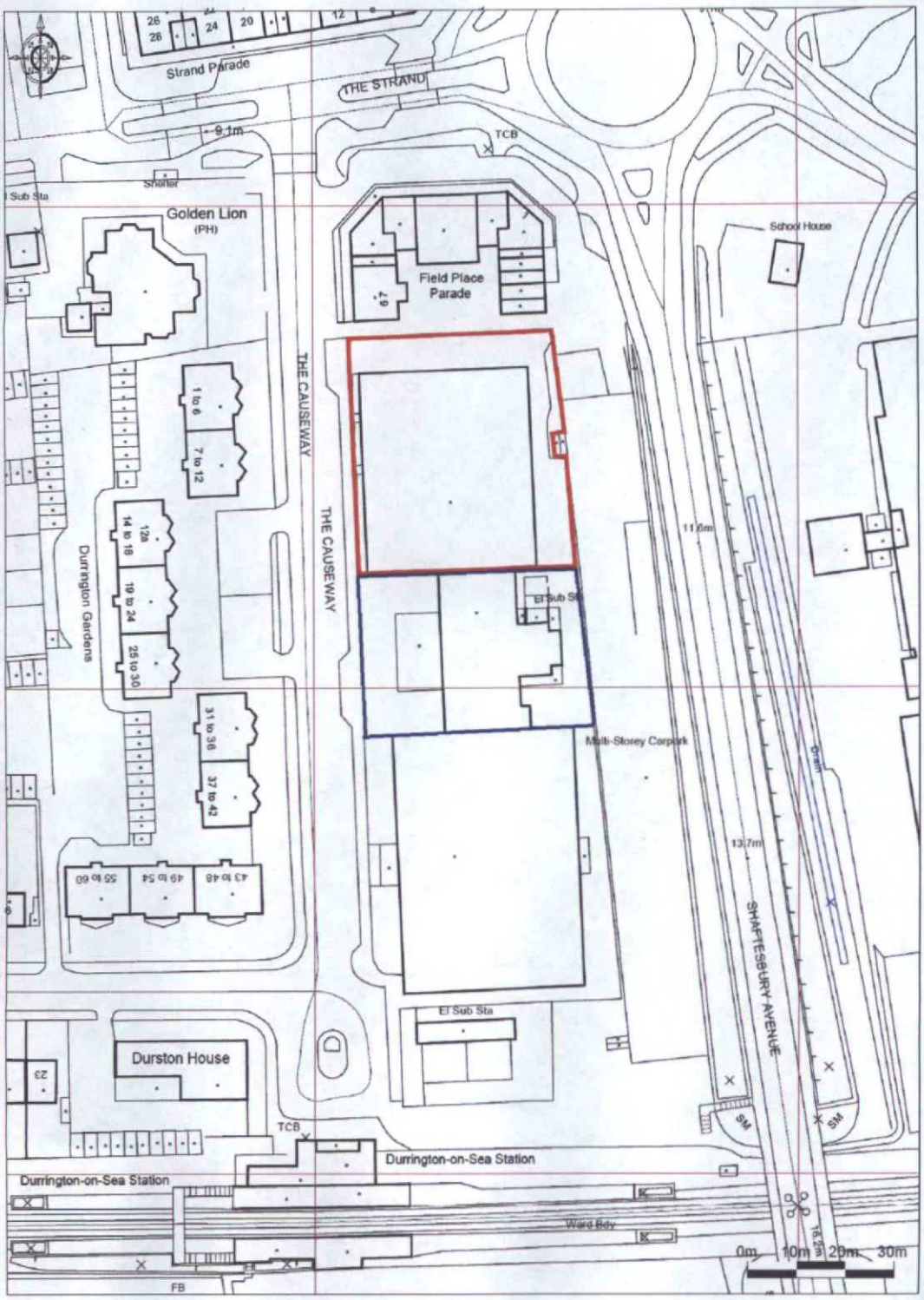
    d) The installation of primary service infrastructure within the building necessary to facilitate the provision of comfort cooling, air handling, circulation & replacement of lighting & small power supplies.

    e) The refurbishment of the lift cars & their operating equipment.

    f) The refurbishment of the common parts, including lobbies, landings, staircases & toilets, such as will initially be required to be made operational to serve the ground to third floors of the building.

    g) The completion of the office accommodation to be provided on the ground, first, second & third floors of the building, all to a standard such as will enable it to be offered available to let on such terms as are prevailing in the market as at the time.

PLAN


Strand Parade
THE STRAND
9.1m
TCB
Shelter
Sub Sta
Golden Lion
(PH)
Field Place
Parade
School House
THE CAUSEWAY
THE CAUSEWAY
Durrington Gardens
1 to 6
7 to 12
12a
14 to 18
19 to 24
25 to 30
31 to 36
37 to 42
43 to 48
49 to 54
55 to 60
El Sub Sta
Multi-Storey Carpark
11.6m
9.4m
13.7m
SHAFTESBURY AVENUE
SM
SM
Durston House
23
TCB
Durrington-on-Sea Station
Durrington-on-Sea Station
Ward Bdy
FB
18.2m
0m
10m
20m
30m

APPENDIX 2

RETAIL CONTEXT

Prepared by Cluttons Tod Miller

1. **Location**

1.1 The Strand is an established neighbourhood shopping centre probably constructed in the 50's and 60's, consisting of a continuous parade of some 20 shops with flats above on the north side, (Strand Parade) and a smaller parade on the southern side (Field Place Parade). This shopping area has not developed further since its construction.

1.2 The application site immediately adjoins the southern boundary of the Field Place Parade part of the local centre as defined in the Local Plan. Policy S5 of the Local Plan envisages and is supportive of extensions to local centres on land immediately adjacent to them.

2. **Existing Retail Mix**

2.1 The Strand is a typical neighbourhood centre providing basically small non-multiple chain retailers and services. It provides a total of about 1,600 sq m of retail and related floorspace within 24 small units. It has a single convenience store (The Co-op) of approximately 240 sq m created from four inter-connecting shop units. The main customer base for retail outlets within The Strand local centre, as is commonly the case with similar local centres, is the residential population within the surrounding area.

2.2 Like many neighbourhood centres The Strand has been fighting a constant battle to retain trade and retailers. In a local context, the Threshers off-licence has recently closed within The Strand. The local centre also contains a significant proportion of "service" orientated units (e.g. restaurants, take-aways), and a number of charity shops.

2.3 Retail customers have, in recent years, been using supermarkets and out of town stores for increasing proportions of their retail expenditure. On-line shopping, both for convenience and durable goods, has also seen considerable growth. These trends have impacted on local centres, especially those formed wholly or mainly of small retail outlets. The large stores in the wider area (Tesco at West Durrington and Sainsbury at Lyons Way and Rustington for example) offer advantages of scale, range and convenience which compete with local centres, particularly those comprising wholly or mainly small units as is the case at The Strand.

2.4 The introduction of one or more larger units as an addition to established local centres can assist in countering this trend of expenditure being drawn away to more peripherally located much larger stores. Providing such a "counter magnet" as part of The Strand local centre would help to retain and recover trade otherwise diverted to more distant, peripheral and less accessible stores. The effects of this would also impact on the existing smaller retail units in The Strand which would benefit from the resulting general increase in vitality and increased retention of locally generated retail expenditure.

3. The Proposal

3.1 The proposal is to create 1,175 sq m of new retail accommodation which will support and reinvigorate the function of The Strand as a focus for retailing and associated community, leisure and business facilities. Two retail units fronting The Causeway are to be created by reconfiguring and converting the ground floor of the existing two storey office building. One unit will provide 180 sq m of retail accommodation and the other 995 sq m (including storage).

3.2 The larger unit is likely to be of interest to one of the contemporary food formats though divisibility into two units is a feasible option. Potential occupiers with food orientated formats appropriate for this neighbourhood location include Marks and Spencer Simply Food, Tesco and the Co-op.

3.3 These stores being predominantly food outlets, offer the greatest potential draw for smaller centres such as The Strand. They provide a range of food and selected non-food items of good quality and value. Their retail offers are substantially more varied, deeper and economic than a convenience store and can contain a provision of non-food items such as housewares, homewares and kitchenwares.

3.4 A high proportion of customers would travel on foot and public transport from the surrounding areas, which contain mature and high density housing, in excess of 20,000 sq m of remaining employment space, the Sixth Form College and the busy mainline railway station.

3.5 Existing car parking provision at The Strand, The Causeway and within the wider site owned by the applicants will support the retail function of the extended local centre.

4. Conclusion

4.1 A new retail provision of this size and range of product would act as a catalyst for the regeneration and future security of The Strand as a neighbourhood retail centre, halting and reversing the gradual decline it has been experiencing over the last 20 years.

4.2 It would encourage greater use of surrounding services and existing businesses further enhancing the strength of this neighbourhood centre.

4.3 Its impact would be felt only by the retention of a greater proportion of local spending within The Strand neighbourhood and countering the further diversion of trade e.g to the expanding Tesco at West Durrington.

4.4 The size of unit would not compete with existing premises within the local centre but would enhance the provision, widening the scope of retailer who might be potentially attracted to this type of location eg Woolworths Local, and also offering for the first time "showroom" style space could potentially strengthen the comparison shopping element of The Strand local centre.

APPENDIX 3

RETAIL IMPACT ASSESSMENT

1.0 INTRODUCTION

1.1 This section presents an assessment of the impact of the proposed additional retail floorspace. The policy context for such assessments is in the process of changing. The "test" set out in the 2005 version of PPS6 is confined to an assessment of "need", usually interpreted through a numerical calculation of retail expenditure in comparison with the amount of floorspace to accommodate such expenditure.

1.2 This approach has been acknowledged as being unduly simplistic and a revised version of PPS6 has been published in draft form in July 2008. Although at present this is not formally adopted as a replacement for the 2005 version, it is clear that an assessment of the impact that is consistent with the emerging approach is to be preferred.

1.3 The assessment set out in the following paragraphs therefore addresses the matters identified in the emerging July 2008 version of PPS6.

2.0 RETAIL CONTEXT

2.1 Retailing in Worthing is composed principally of three categories of provision. These are the town centre, district and local centres and out of centre stores. The town centre has over 152,000 square metres of gross retail and service business floorspace[3]. However, the town centre is not the main focus of convenience retail expenditure, accounting for only 9% of the market share of foodstuffs[4]

2.2 The overwhelming majority of convenience retail expenditure (68%) is accounted for by out of centre stores, of which two thirds is attributable to the Tesco store at West Durrington, with Sainsbury's at Lyons Way accounting for the majority of the remainder.[5]

---

[3] Coastal Districts Retail Study - DTZ Pieda [Sept 2005] paragraph 3.12
[4] Coastal Districts Retail Study - DTZ Pieda [Sept 2005] paragraph 3.26
[5] Coastal Districts Retail Study - DTZ Pieda [Sept 2005] paragraph 3.27

2.3 Worthing town centre is underperforming in terms of its retail offer. A major problem is seen as the lack of appropriate sites for retail development[6].

2.4 The District and Local Centres of Broadwater, Goring Road and The Strand cater predominantly for retail expenditure drawn from their immediate residential catchments. These centres are all dominated by small units. The convenience stores in these centres are also all small, with only one (Iceland at Wallace Parade, Goring Road) exceeding 400 square metres. By comparison, the out of centre stores are significantly larger (Tesco at West Durrington 3000 square metres, Sainsbury's at Lyons way 2850 square metres).[7]

2.5 It is undoubtedly the small size of the district centre units in comparison with the out of centre stores which is the principal cause of these centres capturing such a small proportion of the convenience goods expenditure from their immediately adjacent residential catchments. As Cluttons Tod Miller point out in Appendix 2, ... *"providing ... a "counter magnet" as part of The Strand local centre would help to retain and recover trade otherwise diverted to more distant, peripheral and less accessible stores".*

3.0 RETAIL DIVERSITY

3.1 The Strand is a typical neighbourhood centre providing basically small non-multiple chain retailers and services. It provides a total of about 1,600 sq m of retail and related floorspace within 24 small units. It has a single convenience store (The Co-op) of approximately 240 sq m created from four inter-connecting shop units. The main customer base for retail outlets within The Strand local centre, as is commonly the case with similar local centres, is the residential population within the surrounding area.

3.2 Like many neighbourhood centres The Strand has been fighting a constant battle to retain trade and retailers. In a local context, the Threshers off-licence has recently closed within The Strand. The local centre also contains a significant proportion of "service" orientated units (e.g. restaurants, take-aways), and a number of charity shops.

---

[6] Worthing Property Market Assessment – Donaldsons (Dec 2005) paragraph 2.76
[7] Coastal Districts Retail Study - DTZ Pieda (Sept 2005) Table 3.4

3.3 Retail customers have, in recent years, been using supermarkets and out of town stores for increasing proportions of their retail expenditure. On-line shopping, both for convenience and durable goods, has also seen considerable growth. These trends have impacted on local centres, especially those formed wholly or mainly of small retail outlets. The large stores in the wider area (Tesco at West Durrington and Sainsbury at Lyons Way and Rustington for example) offer advantages of scale, range and convenience which compete with local centres, particularly those comprising wholly or mainly small units as is the case at The Strand.

3.4 The introduction of one or more larger units as an addition to established local centres can assist in countering this trend of expenditure being drawn away to more peripherally located much larger stores. Providing such a "counter magnet" as part of The Strand local centre would help to retain and recover trade otherwise diverted to more distant, peripheral and less accessible stores. The effects of this would also impact on the existing smaller retail units in The Strand which would benefit from the resulting general increase in vitality and increased retention of locally generated retail expenditure.

4.0 CONSUMER SPENDING

4.1 It is appropriate to take 2009 as the year of assessment for the purposes of this analysis. The average Convenience expenditure per head of population for the coastal districts of Chichester, Arun and Worthing is estimated by DTZ Pieda as £1650 per year[8].

4.2 The mid-year population estimate of Worthing was 98,700 in 2006 (Office for National Statistics). For 2011 this is estimated by the county council to have increased to 100,200. taking a pro rata allocation gives a population in 2009 of very close to 100,000.

4.3 On this basis the total retail expenditure on convenience goods in Worthing in 2009 is likely to be of the order of £165 million.

[8] Coastal Districts Retail Study - DTZ Pieda [Sept 2005] Appendix 7 Stage 1

4.4 The Coastal District Retail Study assumes that market shares between competing centres would remain unchanged with 77% of Worthing's expenditure on main food items being retained in the Borough. However, for convenience spending such an assumption does not reflect the policy objective of ensuring that the need to travel for shopping purposes is minimised. A more appropriate assumption, reflecting policy directed towards minimising the need to travel, is that the proportion of spending retained within the Borough should be closer to 100%.

4.5 It is perhaps not reasonable to assume that 100% retention will be achieved, but rather to assume that there would be a broad balance between inflow and outflow of expenditure. On this basis it is reasonable to take £165 million as a robust estimate of convenience goods spending in Worthing which should be catered for.

4.6 A small proportion (9%) of this expenditure is accounted for by town centre convenience stores leaving £150 million to be divided between District and Local Centres on the one hand and out of centre stores on the other. At present Worthing's District and Local Centres account for a very small proportion of total convenience retail expenditure. The out of centre stores dominate the picture. It is appropriate, as a matter of deliberate policy, to seek to redress this imbalance.

4.7 Such a rebalancing of the opportunities for convenience goods retailing would enable shorter shopping trips, which would be less dominated by the private car, would revitalise District and Local Centres and would encourage linked trips.

4.8 The Strand Local Centre is located close to a point where three Wards meet (Goring, Marine and Castle). The retail catchment of The Strand is likely to be confined principally to these three Wards, which in the 2001 census had a total population of 23,386. Using the average annual convenience retail expenditure from the Coastal Districts Retail Study (£1,650 per head) gives a convenience expenditure of £38.58 million for the three Wards on the 2001 population.

4.9 The Coastal Districts Retail Study indicates an average convenience retail turnover of £4,048 per square metre of retail floorspace for the District and Local Centres in Worthing at 2009[9]. By comparison, the out of centre stores are estimated to achieve a turnover of more than double that (£10,169). This is

almost certainly a direct result of the much greater scale of the out of centre stores compared with the much smaller size of the units which make up the District and Local Centres.

4.10 The 1,075 square metres of new retail floorspace that is proposed in this application would account for a turnover of some £4.35 million on a consistent basis. This would represent some 2.6% of the convenience expenditure in Worthing.

5.0 TRADE DIVERSION

5.1 The 1,075 square metres of new retail floorspace that is proposed in this application would account for a turnover of some £4.35 million assuming a constant floorspace/turnover ratio. This would represent some 2.6% of the convenience expenditure in Worthing. It would account for a greater proportion of the convenience retail expenditure generated in the three local Wards, but still only 11.3%.

5.2 The majority of this trade diversion is likely to arise from a "clawing back" of a small proportion of expenditure from the local area which is at present attracted to out of centre stores, especially Tesco at West Durrington. As a proportion of the turnover at those stores, any such diversion will be insignificant.

5.3 Significant diversion of trade is unlikely to be experienced at Goring Road. That is a larger centre overall than The Strand and its convenience store offer (which includes Alldays, Co-op, Iceland and several other smaller stores) will be of a closely similar scale to that at The Strand with the additional floorspace now proposed.

5.4 The small degree of trade diversion will have no noticeable impact on the vitality and viability of either the West Durrington Tesco or the Goring Road Centre. Broadwater is a greater distance away and is unlikely to be a significant draw of expenditure from the area around The Strand at present, so there is little scope for the diversion of trade from that centre.

---

[9] Coastal Districts Retail Study - DTZ Pieda [Sept 2005] Appendix 7 Stage 6

6.0 IMPACT ON TOWN CENTRE INVESTMENT

6.1 The town centre of Worthing caters for a small proportion of existing convenience turnover in the Borough. Its role is much more of a regional durable and comparison goods centre. In any event, its distance from the residential areas around The Strand and the existence of more convenient retail opportunities closer to the surrounding residential areas means that the town centre is not a significant destination of convenience expenditure generated in the western part of the town.

6.2 Irrespective of the minor role that the town centre plays in convenience shopping for the population of the three Wards around The Strand, there is a lack of sites in the town centre where additional provision could be made for larger stores[10]. For these reasons the provision of a modest addition to the retail provision as an extension of the existing Strand Local Centre would not have any significant impact on investment in the town centre.

6.3 Increasing the ability of The Strand to compete with out of centre stores, enhancing its attraction of convenience spending from the immediately surrounding area, would be a positive encouragement to additional investment elsewhere in The Strand Centre. This would further bolster the attractiveness of the Centre and counter the potential decline that Cluttons Tod Miller identify in Appendix 2.

7.0 PROMOTION OF REGENERATION

7.1 The Council's emerging Core Strategy identifies The Strand as one of three strategic locations where regeneration and renewal is specifically to be encouraged and promoted. The additional retail accommodation proposed will support and be consistent with this objective.

7.2 Without the creation of retail accommodation on the ground floor of the building, it will not be possible to support the expenditure necessary to bring the first floor to a standard that would have the prospect of attracting new occupiers to replace Equiniti when it vacates the building in the near future. The expenditure

[10] Worthing Property Market Assessment – Donaldsons [Dec 2005] paragraph 2.76

required to create an independent access to the adjacent office tower, in accordance with the planning permission already granted by the Council, would also be unlikely to be able to be committed to without the certainty that a viable use could be implemented for the ground floor of the building.

7.3 The implementation of the physical works of conversion will also bring about a substantial enhancement of the visual appearance of the building, substantially improving the contribution that it will make to the street scene. This will be a further contribution to the physical renewal and regeneration sought by the emerging Core Strategy.

8.0 JOB CREATION

8.1 The building which is the subject of this application is to be vacated by Equiniti, its present occupiers, in the near future. Because of its form and condition there is no realistic prospect of the re-occupation of the ground floor for office purposes.

8.2 With a degree of refurbishment, internal remodelling and repair, the first floor would have potential to attract office or similar occupiers requiring a single large floor of relatively open plan accommodation at competetive rental levels. However, without an economically viable new use for the ground floor, which would justify and support the repair and refurbishment costs that will need to be incurred, the employment potential of the first floor would not be realised as this alone could not support the expenditure required. There is therefore no realistic prospect that any job potential would be retained in the building without the ability to use the ground floor for an economically viable use.

8.3 Furthermore, the ability to commit to and justify the expenditure necessary to provide for the adjoining office tower to be refurbished so as to be sufficiently attractive to the market and to have a reasonable prospect of being reoccupied for employment purposes, is also dependent on a viable use for the ground floor, as is proposed.

8.4 The retail accomodation will, of course, generate its own employment. The numbers involved will be dependent on the precise nature of the occupiers, but given that there is no prospect, without retail use, of any employment within the ground floor once the present occupier leaves, any employment will be a net addition.

9.0 CONCLUSION

9.1 The proposed additional retail accommodation proposed in this application is of a relatively small scale and is to be formed through the reuse of an existing built form which is redundant for its previous use. Although, as advised in paragraph 3.19b of the July 2008 draft of PPS6, an impact assessment is not usually required in respect of developments less than 2,500 square metres (the proposal involves less than half this figure), an assessment has nevertheless been undertaken.

9.2 The recent draft revision to PPS6 has been published for consultation, but it is clear from the Ministerial Foreword to the document (by Hazel Blears) that the fundamentals of the policy that is sets out are not to be altered. It follows therefore that the form of any impact assessment should be more broadly based than under the 2005 version of PPS6. The matters set out in the new draft PPS6 have therefore been addressed in this assessment. The blunt tool of the "needs test" set out in the earlier version of PPS6 is no longer seen as an appropriate framework, focussing as it did unduly on numerical assessments of retail capacity (which sometimes gave the appearance of spurious accuracy and had unintended adverse consequences).

9.3 The assessment demonstrates that:-

- The new retail accommodation proposed will add to retail diversity at The Strand Local Centre;
- This will assist The Strand Local Centre to improve the function it is able to provide to the local immediately surrounding residential area;
- The creation of a larger retail unit will help to counter the inappropriate over-dominance of out of centre stores in catering for convenience retail spending in Worthing;
- There will be an enhancement of consumer choice providing, in an accessible location close to home, competitive alternatives to mainly car based out of centre stores;

- The retail development will, by increasing the attractiveness of the Local Centre as a whole, act as a catalyst to increased retailer investment leading to further enhancements in the Local Centre in the future;

- Securing an economically viable use for the ground floor of the building will stimulate investment to encourage the re-occupation of the first floor of the building for employment purposes, as well as the refurbishment of the adjacent office tower. This will enable the continuation of significant employment levels in the vicinity, as well as that directly associated with the retail use;

- The physical refurbishment involved in the proposals will bring about visual enhancements which will contribute to the regeneration and renewal of The Stand area envisaged in the Council's Core Strategy.

9.4 Taking all these factors into account the impact of the retail accommodation proposed as part of the reuse of this building will be positive. There will be no significant adverse consequences that would indicate that planning permission should be withheld for the proposed development.

APPENDIX 4

WASTE STRATEGY

1. Introduction

1.1 This Waste Strategy outlines the approach to be adopted to the management of waste during the construction and refurbishment and occupation stages of the development proposed in this application, at The Causeway, Durrington.

1.2 It has been recognised by Cantium Developments Ltd that there are many opportunities to minimise waste to landfill sites and that this process starts early in the design of the scheme with the specification of;

- materials with recycled content
- materials that have low waste potential
- careful design to ensure that waste arising from off cuts is minimised
- inclusion of sufficient space within the final scheme for waste separation and recycling both within the office and retail accommodation, including the setting aside of areas for waste and recycling collection.

2. The Construction & Refurbishment Stage

2.1 A hierarchy will be adopted on the scheme for all waste materials that are generated during the construction and refurbishment stage of the develoment;

- All materials that can be reused on site (without the need to leave site) will be identified.
- All materials that can be recycled into the industry either locally or nationally will be identified.
- Material to be disposed of by landfill will be confined to any material that can not be reused on site or recycled.

2.2 Cantium Development's contracts with the selected contractor will include clauses to ensure that the Demolition Waste and Recycling Hierarchy is adhered to.

2.3 In accordance with the Clean Neighbourhoods and Environment Act 2005 that came into force in April 2008 a Site Waste Management Plan (SWMP) will be prepared that will minimise construction waste to landfill sites. The SMARTWaste software tool will be used to prepare, implement and review the SWMP. www.smartwaste.co.uk

2.4 A specialist Waste Management Contractor will be employed to manage all waste removal from site. Where at all possible waste will be segregated on

site or if space precludes this, waste separation will take place off site at the contractor's waste transfer station.

2.5 Materials that will be recycled during the refurbishment and construction phase will include, but will not be limited to;

- concrete
- masonry
- timber
- metal
- glass
- plastics
- plasterboard
- packaging
- paper

3 The Occupation Stage

3.1 Provision will be incorporated in the development to ensure that retail and office occupiers will be able to manage waste generated on site in an appropriate way, consistent with the principles of waste minimisation and ensuring that recycling can take place to the maximum degree.

Offices

3.2 The principal category of recyclable waste associated with office use of the first floor is likely to be paper and packaging material. Facilities will be incorporated, as shown on the application drawings, for the storage of waste on site, with separate provision for recyclable and non-recyclable components.

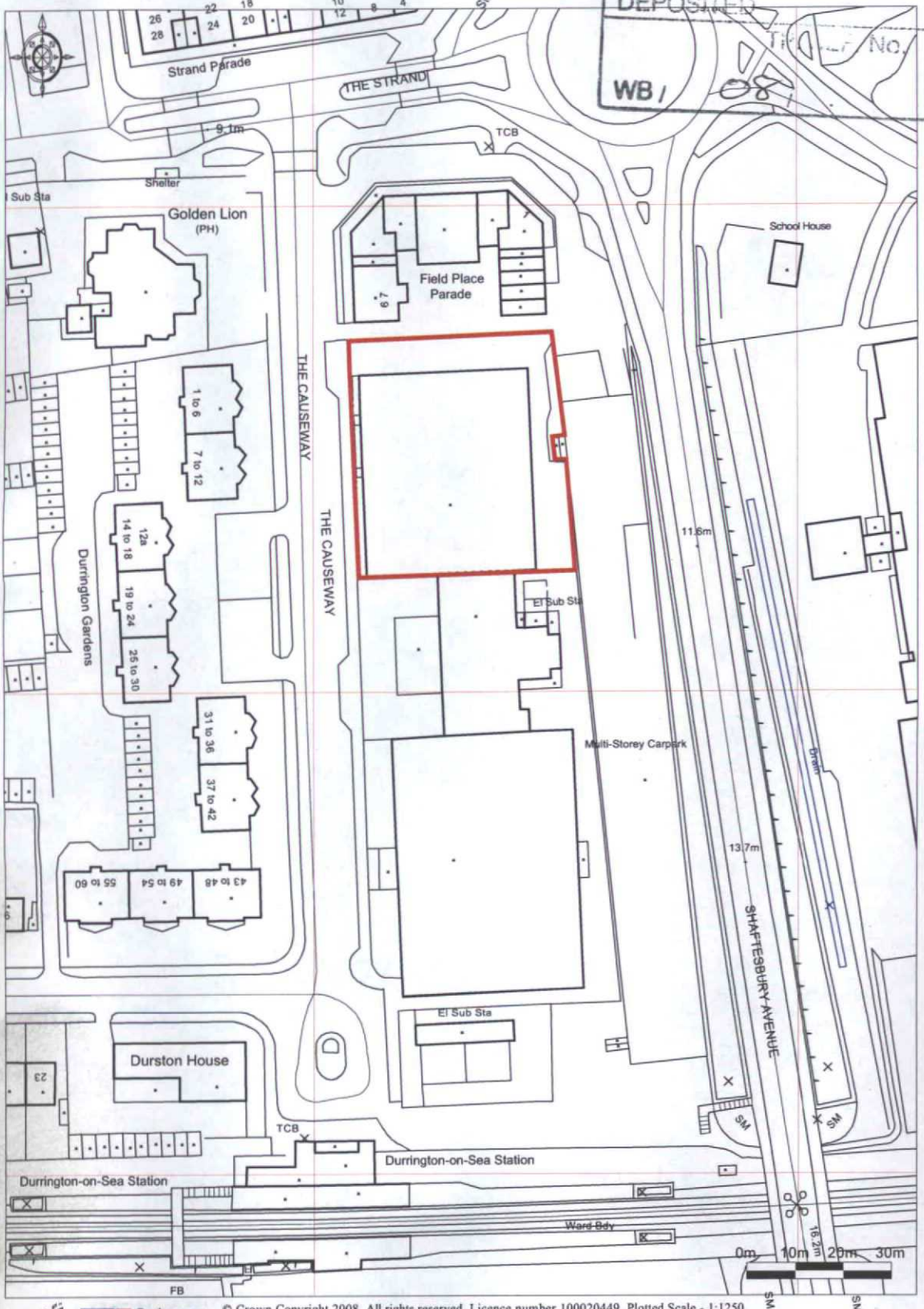
Retail

3.3 A dedicated space will be provided for the retail accommodation, as indicated on the application drawings, to enable the storage of waste and the separation of recyclable materials. Waste will be collected by a private commercial waste contractor.

3.4 Within the retail accommodation provision will be made for customers to recycle paper, glass and cans. The collection of these will be included within the contract of the private commercial waste contractor for the retail accommodation.

T.P. OFFICE COPY

BOROUGH OF WORTHING
DEPOSITED 14.8.08
WB/08/0851/FUL



© Crown Copyright 2008. All rights reserved. Licence number 100020449. Plotted Scale - 1:1250

PROPOSED RETAIL USE OF GROUND FLOOR
AT THE CAUSEWAY, DURRINGTON
LOCATION PLAN - RHPC 002