From: Ben Daines
Sent: 18 November 2009 12:26
To: Peter Barnett
Subject: 339 Brighton Road - Planning app ref: ADC/0270/09

Peter,

I have now had the opportunity to look at the above planning application and would make the following comments in relation to PPS6:
(i) The retail assessment shows that the proposal would meet the needs test and demonstrates that even with the proposed convenience store, an expenditure surplus of £0.22m would still be available within the catchment area (as defined in the retail statement). The proposal therefore appears to be meeting a clearly defined need.
(ii) Given the expenditure surplus in the catchment and the size of the proposal (390sqm gross) when compared to the size of nearby main food retailers i.e Somerfield (Lancing) which has a floor area of 1468sqm gross, it is my view that the proposal is of an appropriate scale to meet a local need and would primarily be used for top-up shopping. This would therefore satisfy part b) of the Assessing Proposed Developments section of PPS6, although the retail statement doesn't specifically address this point.
(iii) The retail statement doesn't apply a sequential approach to site selection. Instead it states that '*given the proposal is to meet a local need within the local catchment, seeking to locate the proposal within a town centre outside the local area would be inimical'*. To some extent, it would seem unnecessary to direct a proposal that aims to the meet the top-up convenience shopping needs of a local catchment towards the town centre. However, to apply PPS6 rigidly would suggest that given that the site is not in an existing centre and is not allocated in an up-to-date development plan document, the sequential test to development should be undertaken. Personally, I am not clear that this exercise would be worthwhile however, given that the proposal is not large enough to be a main food convenience store and such an approach would defeat the aim of providing a store that has a demonstrated local need within the local catchment.
(iv) The retail statement does suggest that 10% of the proposals turnover will be from main food shopping expenditure. This is likely to mean that, in some cases, a small proportion of residents within the local catchment who would have otherwise gone into the town centre to do their main food shopping may now do their main shopping at the proposed store. It is my view however, that the impact on the viability and vitality of the town centre is likely to be negligible. It is also my view that anybody outside the catchment area is unlikely to carry out their main food shopping at the proposed store. There is, therefore, a likelihood that the proposed store might actually play a very small part in reducing traffic movements as residents within the catchment area would not have to travel so far for top-up shopping.
(v) I am also happy that parts d) and e) of PPS6 have been adequately addressed.

In conclusion, although a sequential test has not been carried out for the proposal in accordance with PPS6, I believe the justification for not carrying out this exercise as stated in the retail statement is reasonable. Therefore I would raise no objection to the proposal. Please note however that my comments are only in relation to PPS6 and I have not looked at issues such as impact on the amenity of neighbouring properties and highways issues. I trust that these issues will be looked at by the Development Control Section as part of the assessment of the wider impacts of the planning application.

As a final point, there is some further information that would be useful. Some justification as to why GL Hearn consider 800m to be an appropriate walking distance, and also some comparable sales densities. Both the distance and the sales densities seem reasonable to me but a little more info on where these figures came from would be useful. When you get this info I would be grateful if you could run it past me.

Regards,

Ben Daines
Planning Policy Officer