



Development Management Plan (Regulation 19)

Retail Warehouse Areas: Review, Designation & Policy

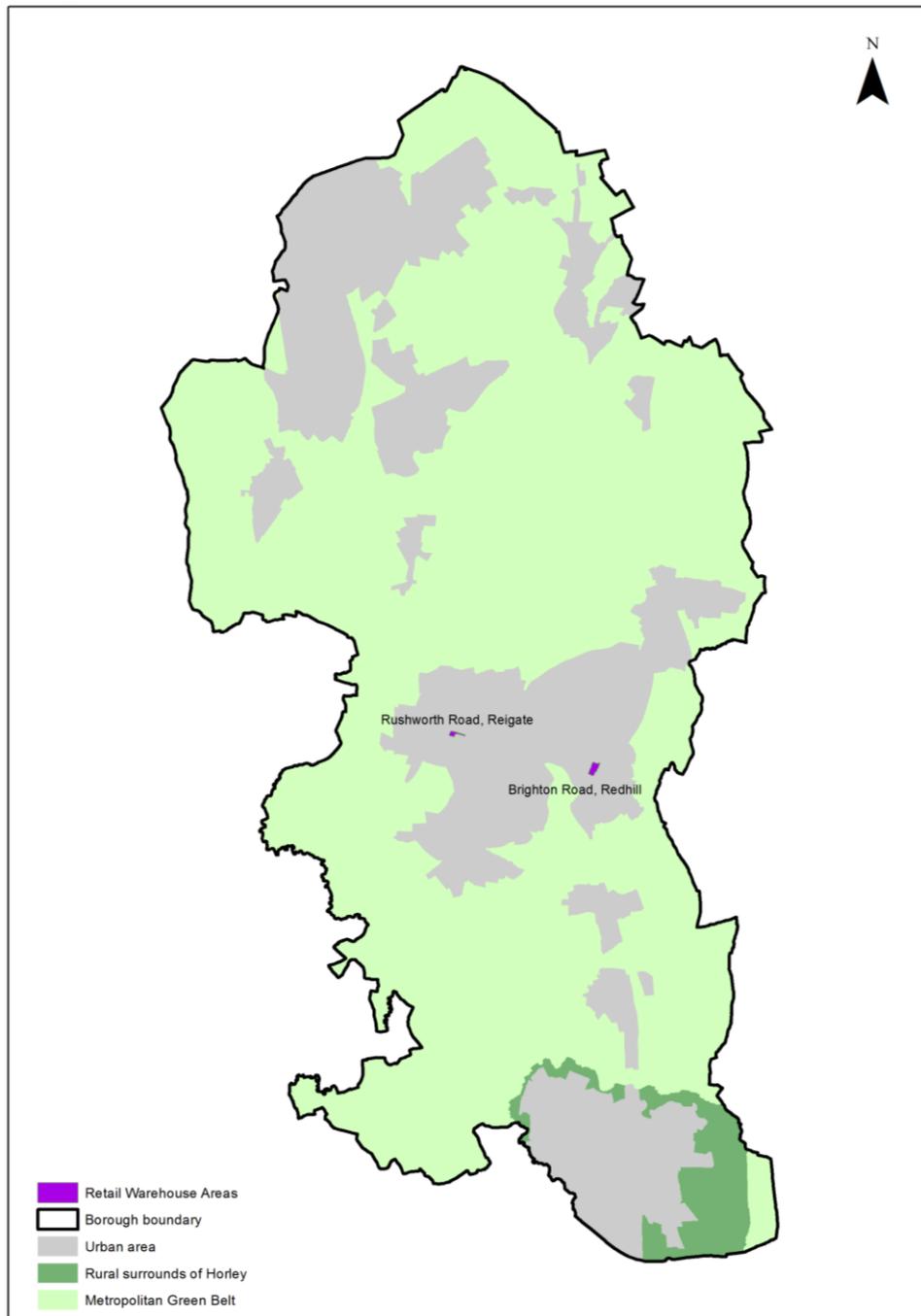
October 2017

1. Introduction

- 1.1 The 'retail warehouse' falls under "A1" use class, along with most "standard" types of retailing. It became a feature of UK retailing in the early 1980s, with companies such as B&Q, Comet and Allied Carpets rapidly expanding through building "big box" stores in locations away from traditional retail areas. These stores typically specialised in particular types of bulky comparison goods such as do-it-yourself items and bulky goods such as electrical/ electronic goods, carpet and furniture which require large display areas, generally require a car to take home, and sometimes with internal access for fork-lift trucks. In the late-1980s a "town centre first" approach was introduced which restricted the sale of A1 uses to town centres to the town centre unless adequate provision could not be provided within the town centre.
- 1.2 National policy requires a sequential test, and retail impact test, such that standard comparison A1 goods should not be permitted from non-town centre sites unless no central, suitable sites are available. This makes it particularly important that where retail warehouses are designated appropriate restrictions are included in policy (and subsequent planning applications) to ensure that such provision does not undermine the vitality of existing town centres.
- 1.3 Within the borough, the 2005 Borough Local Plan¹ allocates two retail warehouse areas:
 - Rushworth Road, Reigate: free standing unit
 - Brighton Road, Redhill: three units

¹ <http://localpl.reigate-banstead.gov.uk/>

Figure 1 Retail Warehouse Areas



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- 1.4 To inform Regulation 18 Development consultation, a Retail Warehouse paper² was prepared. It reviewed the existing policy and designations to assess whether they are still appropriate and/ or whether they need updating.
- 1.5 The paper recommend that:
- The two existing retail warehouse areas designated in the 2005 Borough Local Plan should be carried forward to the Development Management Plan.

² http://www.reigate-banstead.gov.uk/downloads/file/2636/retail_warehouse_areas

- Retail warehouse areas and/ or sites allocated specifically for bulky goods retail provision should be the focus for large format, out-of-centre retail proposals.
- Proposals for retail warehousing within designated areas will be expected to submit a retail impact assessment to ensure development does not detract from or have a negative impact on the vitality and viability of existing town centres.
- Proposals for retail warehousing outside of designated areas will be expected to demonstrate compliance with the sequential test and be supported by a retail impact assessment.
- Policy for managing development and uses in retail warehouse areas should provide a clear restriction on the types of retail goods which are appropriate.
- Recommends that appropriate uses should not normally be found in town centres (or capable of locating in town centres): namely uses which usually occupy a single floor, cater for car-borne customers, and which sell bulky durable and household goods (such as DIY, home and garden improvement products, hardware, self-assembly and pre-assembled furniture, floor coverings, electrical goods, motor accessories and parts, office supplies, bicycles and motor vehicles, pets and pet-related products).
- Policy should ensure consideration is given to:
 - Impact on the vitality and viability of nearby centres, and planned investment in those centres – in accordance with national policy and the Council’s own proposed local retail impact threshold
 - Impact on traffic and parking in the surrounding area given the car-borne nature of customers

1.6 This paper supersedes the Regulation 18 Development Management Plan Regulation 18 Retail Warehouse Paper. It reviews the recommendations in the Regulation 18 Development Management Plan Regulation 18 Retail Warehouse paper taking into account changes since the previous paper was produced (for example, planning permissions granted and changes of use).

1.7 This paper firstly outlines the existing planning policy context; it then reviews the rationale for designating a retail warehouse within the borough; then identifies retail warehouse areas in the borough; then reviews the policy context; and then outlines a number of recommendations.

2. Existing Policy Context

Use Class Order

- 2.1 The Town and Country Planning (Use Classes) Order 1987 says that retail warehouses are A1 retail.

National Planning Policy Framework (2012)

- 2.2 The National Planning Policy Framework (NPPF)³ does not make any specific reference to retail warehouse areas.
- 2.3 Paragraph 26 of the NPPF says that when assessing applications for retail, leisure and office development that are not within an existing centre and not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate locally set threshold, or exceeds 2,500sqm in the absence of a local floorspace threshold. This should include an assessment of:
- The impact of the proposal on existing, committed and planned public and private investment in the centre or centres in the catchment area of the proposals; and
 - The impact of the proposal on town centre vitality and viability including local consumer choice and trade in the town centre and wider area, up to 5 years from the time the application is made

National Planning Practice Guidance (2014)

- 2.4 The National Planning Practice Guidance (NPPG)⁴ does not make any specific reference to retail warehouse areas.
- 2.5 Paragraph 11 however, notes that the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Where this is the case, robust justification must be provided. Robust justification does not include land ownership.

Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009)

- 2.6 Planning Policy Statement 4: Planning for Sustainable Economic Growth⁵ was replaced by the NPPF. It however provides a useful definition of retail

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁴ <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

warehouse areas: 'large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods catering mainly for the car-borne customer'.

Valuation Office Rating Manual

2.7 Section 878 of the Valuation Office's Rating Manual⁶ covers retail warehouses. It outlines a number of different types of retail warehouses:

- Older buildings converted from either warehouse or industrial use, situated in an area of similar buildings
- Late-1970s-1980s purpose-built retail warehouses away from older industrial estates. They tend to be on a single site in a prominent position convenient to shoppers coming by car.
- Late-1980s-1990s modern estates or parks. These sometimes include a 'terrace' of larger retail warehouses, with a range of bulky goods operators. Some of the occupiers have a more 'high street' feel internally. They typically have a mezzanine floor.
- Mid-1990s-2000s larger modern purpose-built retail warehouses that have been built with 'mezzanines in mind'
- Late-2000s onwards retail parks with a real 'high street' or 'modern' retail feel. They have a high standard of internal layout and mezzanine floors.

Borough Local Plan (2005)

2.8 The Borough Local Plan⁷ designates two retail warehouse areas:

- Rushworth Road, Reigate: free standing unit
- Brighton Road, Redhill: three units

2.9 The Borough Local Plan permits development, redevelopment and extensions in retail warehouse areas subject to satisfying detailed design requirements captured in Policy Sh2. Considerations include making the best use of the site, being of a suitable scale and form and not having an impact on neighbouring properties.

2.10 Policy Sh14 reflects the national 'town centre first' site selection policy approach. It makes clear, with the exception of retail warehouse areas that further retail development outside the town centres (inclusive of extensions to

5

<http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps4/>

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<http://app.voa.gov.uk/corporate/publications/Manuals/RatingManual/RatingManualVolume5/sect878/b-rat-man-vol5-s878.html>

⁷ <http://localpl.reigate-banstead.gov.uk/>

or improvements at existing premises) will be permitted subject to a sequential test and demonstration of need.

- 2.11 The Borough Local Plan defines retail warehouse areas by referencing Annex A of the Planning Policy Guidance 6: Town Centres and Retail Developments⁸: 'large single level stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), and bulky DIY items, catering mainly for car-borne customers and often in out-of-centre locations'. Planning Policy Guidance 6 was subsequently replaced by Planning Policy Statement 4; Planning Policy Statement 4 has since been replaced by the NPPF.
- 2.12 The Borough Local Plan retail warehouse allocations, policy and retail impact policy will be replaced by the subsequent Development Management Plan policies.

Core Strategy (2014)

- 2.13 The Council's Core Strategy⁹ does not make any specific reference to retail warehouse areas across the borough.
- 2.14 Policy CS7 defines the borough's retail hierarchy:
- Redhill: primary town centre, the focus for large-scale leisure, office, cultural and retail uses and developments
 - Banstead Village, Horley and Reigate: the Council will seek to maintain a balance of uses and development that promote the vitality and viability of the town centres
 - Local centres
- 2.15 Policy CS7 promotes an efficient use of land and buildings within existing centres, with higher density redevelopment where appropriate. The Core Strategy requires a sequential approach to the location of town centre uses and an assessment of impact to be applied for proposals for retail and leisure uses outside identified centres.

8

<http://webarchive.nationalarchives.gov.uk/20100519204508/http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicyguidance/ppg6/>

⁹ http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy

3. Rationale for Designating a Retail Warehouse Area

- 3.1 Given the absence of national guidance, there is no requirement for the Council to designate/ to continue to designate retail warehouse areas.
- 3.2 Retail warehouse areas do not fall within the national policy (NPPF) definition of town / local centres. Depending upon their location, they will be classified as edge-of-centre or out-of-centre for the purpose of retail planning and, in this regard, are less sequentially preferable than in-centres.
- 3.3 Retail warehouse areas however perform a specific role in terms of the retail offer in the borough and are complementary to the retail offer of town centres. They provide for those retail uses that are not commonly provided, or often not able to be provided, in the borough's town and local centres. They provide a specific range of goods (often larger/ bulky goods) which require a unique format in terms of their display and scale and attract car borne customers who require dedicated and immediate access to parking.
- 3.4 When located near to town centres, retail warehouse areas can draw people into the town centre. They often have larger catchments than town centres, drawing trade from a greater distance due to the limited availability of alternative outlets.
- 3.5 When located further away from town centres, they often function more independently than town centres because of the increased distance and therefore reduced opportunity for linked trips.
- 3.6 The Regulation 18 Development Management Plan retail warehouse paper therefore recommended that the Council should identify retail warehouse areas to:
 - Ensure, in appropriate locations, the availability of land or appropriate units for large format, restricted goods retailers to locate
 - Provide appropriate protection and support for our existing town centres by ensuring the provision of out-of-centre retail is managed
- 3.7 This is still felt to be appropriate.

4. Identifying Retail Warehouse Areas

- 4.1 The Regulation 18 Development Management Plan retail warehouse paper then reviewed the existing retail warehouse areas to ensure they remain fit for purpose and the boundaries reflect the current conditions. A review was also conducted to identify whether any other locations should be considered as retail warehouse areas.
- 4.2 In the absence of national guidance, the Regulation 18 Development Management Plan retail warehouse paper identified the following key characteristics.

Characteristics of Retail Warehouse Areas

Location

- 4.3 To maintain distinction between town centre uses and retail warehousing uses, retail warehouse areas should ideally be outside of, but ideally in close proximity to town centre boundaries, in order to maximise the benefit to existing centres in terms of linked trips.
- 4.4 Sites with a good visual and pedestrian relationship to the town centre core should be favoured for protection. In this way, they are likely to be a meaningful designation as they will – in most cases – be the most sequentially preferable locations for retail development beyond in-centre sites.

Format, Scale and Type of Provision

- 4.5 In order to perform a retail warehouse function, sites should comprise or have land capable of accommodating large, predominantly, single storey units. Where existing units are present, these should be of an appropriate size (larger than standard town centre units e.g. a minimum of 700sqm).
- 4.6 Sites should be occupied by retailers and operators that sell predominantly larger/ bulky/ specialist goods which cannot be found in town centres.

Access and Car Parking

- 4.7 Retail warehouse areas attract car-borne customers (due to their out-of-centre location and bulky goods use) and sites should therefore be capable of accommodating adequate parking provision to cater for car-borne users. Sites with good access to the main road network should also be favoured for protection.

Review of Existing Areas

4.8 To inform the Regulation 18 Development Management Plan retail warehouse paper, site assessments were undertaken which recorded uses and occupiers. On the basis of the assessments (detailed in Appendix one) it was considered that both sites designated in the Borough Local Plan were worthy of continued protection and that no boundary amendments were required. They were both identified to offer complementary retail to the town centre; be well designed, stand-alone units with good parking provision.

Figure 2 Regulation 18 Development Management Plan Retail Warehouse Paper Summary of Assessments

Name	Ward	Reason	Designate?	Boundary Change?
Brighton Road North, Redhill	Redhill East	<ul style="list-style-type: none"> • Three purpose built retail warehouse units – approximately 3,000sqm in total • Minimum size unit 880sqm • Cohesive, clearly defined development • Direct access to A23 and prominent location • Existing uses/ retailers are complementary to, and not normally found in, the town • Plentiful parking (approximately 1 per 29sqm) • Potential for future expansion 	Yes	No
Rushworth Road, Reigate	Reigate Central	<ul style="list-style-type: none"> • Purpose built retail warehouse unit • Single, stand-alone unit – approximately 2,400sqm • Home improvements / DIY based retailer – not normally found in-town • Plentiful parking (approximately 1 per 29sqm) • Potential for future expansion 	Yes	No

4.9 Since this paper was produced, there have been no changes to the retail provision within the retail warehouse areas. One of the three units on the Brighton Road retail warehouse area remains vacant - a certificate for lawfulness (16/00210/CLP) has been granted as permitted development for the sale of soft and hard furnishings and household textiles, pictures, homewares, glassware, tableware, household goods, bathroom and kitchen goods and accessories, household cleaning products, lighting, seasonal goods and giftware, however, this has not led to a new occupier.

- 4.10 Given the lack of changes, it is still considered that both areas designated in the Borough Local Plan are worthy of continued protection and that no boundary amendments should be made.

Review of Other Potential Areas

- 4.11 The Regulation 18 Development Management Plan retail warehouse paper identified a potential opportunity to the north of the existing retail warehouse are in Redhill. It however recommended that the boundary should not be extended to include this area until such a time as the viability or nature of a scheme on the site is confirmed.
- 4.12 To inform this paper, a desk based assessment has been undertaken of the areas near to the town centres which have the characteristics identified in para 4.3-4.6 above. This is detailed in appendix 2. Again, the only area identified with potential for retail warehouse expansion is the area to the north of Redhill. It is however still recommended that this area should not be included within the boundary until such a time as the viability or nature of a scheme on the site is confirmed.

5. Proposed Policy Approach

- 5.1 In the absence of national guidance, to establish a policy rationale, the Regulation 18 Development Management Plan retail warehouse paper, reviewed local planning appeals.

Local Planning Appeals

Former Mercedes Benz Garage, Brighton Road, Redhill

- 5.2 Planning permission (11/00358/CU) was refused and subsequently dismissed at appeal for the change of use (SG to non-food A1 retail) for the former Mercedes Benz garage in the Brighton Road, Redhill retail warehouse area.
- 5.3 The application was refused as it did not accord with the objectives of Planning Policy Statement 4 (the then most recent planning guidance) and it was deemed that the proposal would have a significant effect on the viability and vitality of the town centre. It was demonstrated that the town centre already had a high vacancy level (above the local maximum target) and that a development not subject to bulky goods restriction would negatively impact the vitality of the town centre. A number of sequentially preferable sites within the town centre (namely a large unit of comparable size under construction on Queensway; nos. 22-27 Belfry; and proposed Marketfield Way scheme) were identified.
- 5.4 During the appeal, the Inspector felt that the current policy lacked definition in terms of the uses permitted:
- The original 1994 Local Plan implied only bulky goods should be sold in retail warehouse areas
 - The 2005 Borough Local Plan defined retail warehouse areas through referencing PPG6 which also considered bulky and household goods to be appropriate.
 - PPG6 had however, since been superseded by national policy which did not define appropriate uses for retail warehouse areas.
- 5.5 The Inspector felt that retail warehouse areas should be for uses not commonly sold in town centres due to their bulk and size.
- 5.6 The Inspector also felt that under the current policy, the general design considerations (Policy Sh2 of the Borough Local Plan) are emphasised more than the uses permitted.

Land at Cambridge Retail Park, Park Road, Haverhill, Suffolk

- 5.7 Planning permission (13/0379/F) was refused and subsequently dismissed at appeal for the development of a retail warehouse unit (789sqm retail area) adjacent to an existing retail park.
- 5.8 The Inspector felt that there were a number of sequentially preferable sites which could provide greater economic benefit to the town centre.

Salisbury Retail Park, London Road, Salisbury, Wiltshire

- 5.9 Planning permission (07/01460/F) was refused for the development of a retail warehouse but subsequently granted at appeal (12,542sqm retail area). The application was for eight retail units, each with a ground floor and mezzanine level.
- 5.10 The site had the benefit of planning permission for a non-food retail warehouse park comprising four units (of 8,361sqm) and a garden centre (of 1,394sqm) which was approved in 1995. Condition 15¹⁰ of the permission restricted the range of goods that may be sold to a specified list generally comprising what are commonly understood as bulky goods.
- 5.11 The main issues at the appeal were the appropriate type of goods to be sold and whether the proposal would be harmful to Salisbury city centre. Their Retail Needs Assessment identified a large need for 23,000-26,000sqm of comparison floorspace within Salisbury and a retail scheme deemed to be developable within 5-7 years was proposed to address this need.
- 5.12 There was doubt over the appropriate types of uses proposed – saved policy S7 allocated the site for comparison and employment provision whilst the extant permission restricted use to the sale of bulky goods. It was felt that whilst policy S7 had been saved it was outdated and that the application should be judged against the more recent PPG6 criteria (namely need, scale, sequential approach to site selection, impact on existing centres and accessibility).
- 5.13 On balance, the Inspector felt that the proposed mix of bulky and non-bulky comparison goods retailing proposed by the appellant (58% of the total gross floorspace would be devoted to bulky goods) would be unacceptably harmful to Salisbury city centre but that the development should be allowed subject to a bulky goods condition and one controlling the minimum size of the units.

¹⁰ The condition states, 'the range and type of goods to be sold from the non-food retail units, hereby permitted, shall be restricted to the following: DIY and/ or garden goods; furniture; carpets and floor coverings; camping, boating and caravanning goods; motor vehicle and cycle goods; and bulky electrical goods. Goods falling outside this range may be sold only where they form a minor and ancillary part of the operation of the proposed stores'.

- 5.14 The proposed bulky goods definition restricted the sale of goods to the following: DIY and/ or garden goods; furniture; carpets and floor coverings; camping, boating and caravanning goods; motor vehicle and cycle goods; and bulky electrical goods.
- 5.15 Based upon these decisions and findings in the Retail Needs Assessment, the Regulation 18 Development Management Plan retail warehouse paper recommended the following policy approach.

Regulation 18 Development Management Plan Retail Warehouse Paper Proposed Policy Approach

Appropriate Uses

- 5.16 Local policy should provide a clear definition of the uses which are appropriate within the areas.
- 5.17 The policy should reflect the principle that retail warehouse areas should be restricted to uses/ goods which are complementary to, and not normally found – or capable of being reasonably accommodated – within town centres. Two defining factors were therefore:
- Bulk, size, weight, quantity of goods and the need to customers to be car-borne as a result
 - Whether, due to the nature of the product, it requires a specific form of display/ sale that cannot reasonably be accommodated in a town centre retail environment
- 5.18 Acceptable uses should typically occupy a single floor, cater for car-borne customers and sell bulky and household goods (such as DIY, home and garden improvement products, hardware, self-assembly and pre-assembled furniture, floor coverings, electrical goods, motor accessories and parts, office supplies, bicycles and motor vehicles, pets and pet-related products).

Retail Impact

- 5.19 Where appropriate proposals within retail warehouse areas should be subject to an impact assessment given their edge-of-centre/ out-of-centre location.
- 5.20 This is particularly important where new/ additional retail space is proposed (i.e. through extensions, mezzanines or new units) and/ or where a change is sought to the restriction on, or type/ nature of, goods to be sold.

Access and Parking

- 5.21 Consideration should be given – in considering proposals for new or expanded provision – to the availability of adequate parking given that retail units of this nature generally attract car-borne customers.
- 5.22 Consideration should be given to the impact of potential vehicle movements on traffic and highway safety in the surrounding area.

Regulation 19 Development Management Plan Retail Warehouse Paper Proposed Policy Approach

- 5.23 Since the Regulation 18 Development Management Plan Retail Warehouse Paper was produced there have been no new applications for retail warehousing within the borough¹¹. A planning application has however been approved by Crawley Borough Council (15/0720/F) for the erection of five retail warehouse units.
- 5.24 Homebase, Crawley Avenue, Crawley: Planning application (15/0720/F) was approved for the demolition of an existing retail warehouse unit (5,294sqm) occupied by Homebase and the subsequent construction of five retail warehouse units (9,391sqm). The unit was within an area characterised by retail warehousing and other commercial and leisure development.
- 5.25 A retail impact assessment was undertaken which showed that the application in combination with others approved would be over the 1% threshold identified in Crawley Council's Retail Capacity Study. It was however felt that it would not be so far beyond the threshold (1.27%) that there would be a cumulative impact that would significantly impact Crawley town centre.
- 5.26 A sequential assessment was undertaken which found that more central sites were either of insufficient size to support the proposal, or lack the necessary access/ servicing to support operations.
- 5.27 In terms of uses proposed, the applicant sought to broaden the range of non-food bulky goods from more traditional bulky goods to include camping goods, homeware and pet products. It was accepted that for operational reasons, the proposal could not be accommodated on more sequentially preferable sites and therefore felt that these uses were acceptable. The uses were restricted to DIY and/ or garden goods; furniture; household furnishing and textiles; carpets/ floor coverings; camping, boating and caravanning goods; motor and cycle

¹¹ As noted in section 4 of this report, a certificate for lawfulness (16/00210/CLP) has been granted for permitted development, however, the unit has not been occupied. This unit has remained vacant for a number of years and has previously had planning permission granted for non-A1 retail warehouse uses. This was taken into consideration in the Regulation 18 Development Management Plan retail warehouse paper.

goods; electrical goods; homewares, office equipment; and pet products and miscellaneous to ensure the vitality and viability of the town centre.

- 5.28 In terms of parking provision and safety considerations, the application was conditioned to not be operational until provision of parking spaces, cycle parking and turning provision.
- 5.29 Given that this application (proposed use and approach) is in line with those recommended in the Regulation 18 Development Management Plan retail warehouse paper, it is recommended that no changes are made to the proposed policy.
- 5.30 It is therefore recommended in this paper that retail warehouse areas and/ or sites allocated specifically for bulky foods retail provision should be the focus for large format, out-of-centre retail proposals.
- 5.31 Proposals for retail warehousing within designated areas will be expected to submit a retail impact assessment to ensure development does not detract from or have a negative impact on the vitality and viability of existing town centres. Outside of these areas, proposals for retail warehousing will be expected to demonstrate compliance with the sequential test and be supported by a retail impact assessment.
- 5.32 Any policy for managing development and uses in retail warehouse areas should provide a clear restriction on the types of retail goods which are appropriate. Such goods should not normally be found in town centres (or capable of locating in town centres): namely uses which usually occupy a single floor, cater for car-borne customers, and which sell bulky durable and household goods (such as DIY, home and garden improvement products, hardware, self-assembly and pre-assembled furniture, floor coverings, electrical goods, motor accessories and parts, office supplies, bicycles and motor vehicles, pets and pet-related products).
- 5.33 Given the nature of retail warehousing development, and the location of the retail warehouse areas, policy should ensure that consideration is given to:
- Impact on the vitality and viability of nearby centres, and planned investment in those centres – in accordance with national policy and the Council’s own proposed local retail impact threshold
 - Impact on traffic and parking in the surrounding area given the car-borne nature of customers

6. Recommendations

Designation of Retail Warehouse Areas

- 6.1 It is recommended that the two existing retail warehouse areas within the 2005 Borough Local Plan are carried forward to the Development Management Plan, that is that the BLP policies are not saved, and that new designations and policy is included within the DMP.

Policy Approach to Retail Warehouse Areas

- 6.2 Retail warehouse areas and/ or sites allocated specifically for bulky foods retail provision should be the focus for large format, out-of-centre retail proposals.
- 6.3 Proposals for retail warehousing within designated areas will be expected to submit a retail impact assessment to ensure development does not detract from or have a negative impact on the vitality and viability of existing town centres. Outside of these areas, proposals for retail warehousing will be expected to demonstrate compliance with the sequential test and be supported by a retail impact assessment.
- 6.4 Any policy for managing development and uses in retail warehouse areas should provide a clear restriction on the types of retail goods which are appropriate. Such goods should not normally be found in town centres (or capable of locating in town centres): namely uses which usually occupy a single floor, cater for car-borne customers, and which sell bulky durable and household goods (such as DIY, home and garden improvement products, hardware, self-assembly and pre-assembled furniture, floor coverings, electrical goods, motor accessories and parts, office supplies, bicycles and motor vehicles, pets and pet-related products).
- 6.5 Given the nature of retail warehousing development, and the location of the retail warehouse areas, policy should ensure that consideration is given to:
- Impact on the vitality and viability of nearby centres, and planned investment in those centres – in accordance with national policy and the Council's own proposed local retail impact threshold
 - Impact on traffic and parking in the surrounding area given the car-borne nature of customers

Appendix 1: Regulation 18 Development Management Plan Retail Warehouse Paper Site Assessments

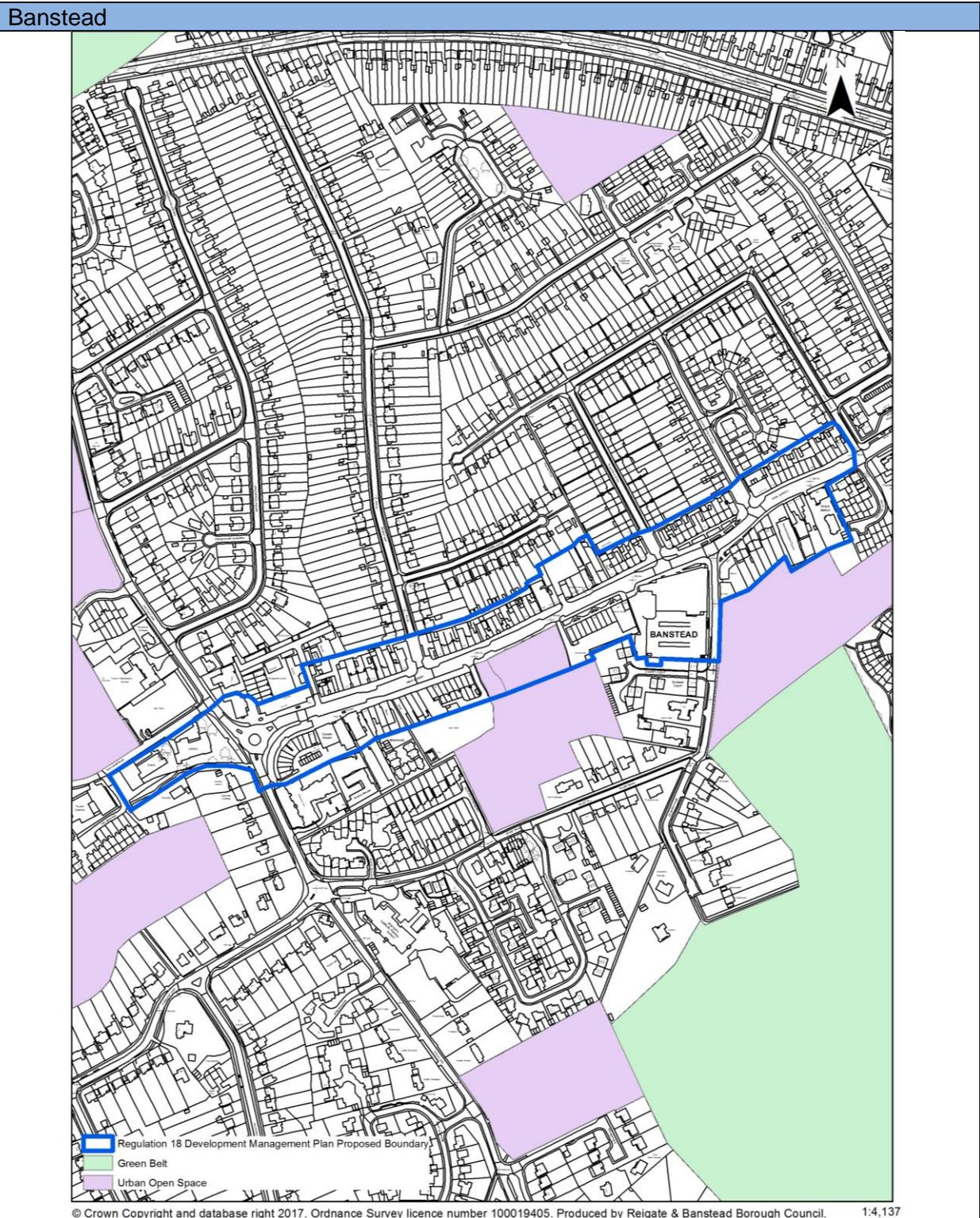
Brighton Road, Redhill					
Ward: Redhill East					
A1	A2	A5	SG	Vacancies	TOTAL
2 Units				1 Unit	3 units
1,808sqm (59%)				1,232sqm (41%)	3,040sqm
Description	<p>Three standalone purpose built retail units. Minimum unit size 880sqm Occupiers include Halfords, Pets at Home. One vacant unit – planning permission for change of use from a former motor showroom (SG) to non-food A1 retail. Uses complementary to the town centre, not competitive – pet shop and cycling/ car maintenance.</p>				
Assessment of Environment	<p>Well laid out – purpose built. Clean and tidy, well maintained. Pedestrian prioritisation - speed bumps slow down traffic. Good parking provision – Approx. 105 parking spaces (Approx. 1 parking space per 29sqm retail floorspace).</p>				
					
Location	<p>Situated just off the main A23 Brighton Road. Less than a mile south of Redhill town centre. Bus stop opposite the units. Relatively good connectivity to town centre – pavements.</p>				

	
Potential for Expansion/Improvement:	<p>Potential expansion on area to north (currently Reading Arch Road industrial estate). Potential intensification of existing units – additional floors</p>
Conclusion	<p>Three purpose built retail warehouses within a well designed retail warehouse area. The uses are complementary and not competitive to the town centre. Plentiful parking and good design. Potential for intensification and potential expansion onto the Reading Arch Road Industrial Estate.</p>
Carry Forward Designation	<p>Yes</p>

Rushworth Road, Reigate					
Ward: Reigate Central					
A1	A2	A5	SG	Vacancies	TOTAL
1 Unit					1 Unit
2,391sqm					2,391sqm
Description	<p>Standalone retail warehouse unit. Occupied by Homebase. Argos operates a click and collect service in the unit. Uses complementary to the town centre, not competitive. Whilst Reigate has a number of shops offering homeware goods, these tend to be more specialist and offer more high end goods than Homebase / Argos.</p>				
Assessment of Environment	<p>Purpose built unit. Good parking provision – approx. 125 spaces (Approx. 1 parking space per 19sqm of retail floorspace). Clean, tidy and well maintained. Speed bumps on Rushworth Road slow traffic down.</p>				
					
Location	<p>Situated on Rushworth Road, adjacent to residential accommodation and within close proximity to Reigate Town Centre Business Area. Bus stop outside store. Further away from town centre than Brighton Road, Redhill but relatively good connectivity to the town centre. Within walking distance of town centre – footpaths and zebra crossings.</p>				
					
Potential for Expansion/Improvement:	<p>Limited opportunities.</p>				

Conclusion	Purpose built retail warehouse, purpose designed with plentiful parking. Uses are complementary to the town centre. Limited intensification opportunities.
Carry Forward Designation	Yes

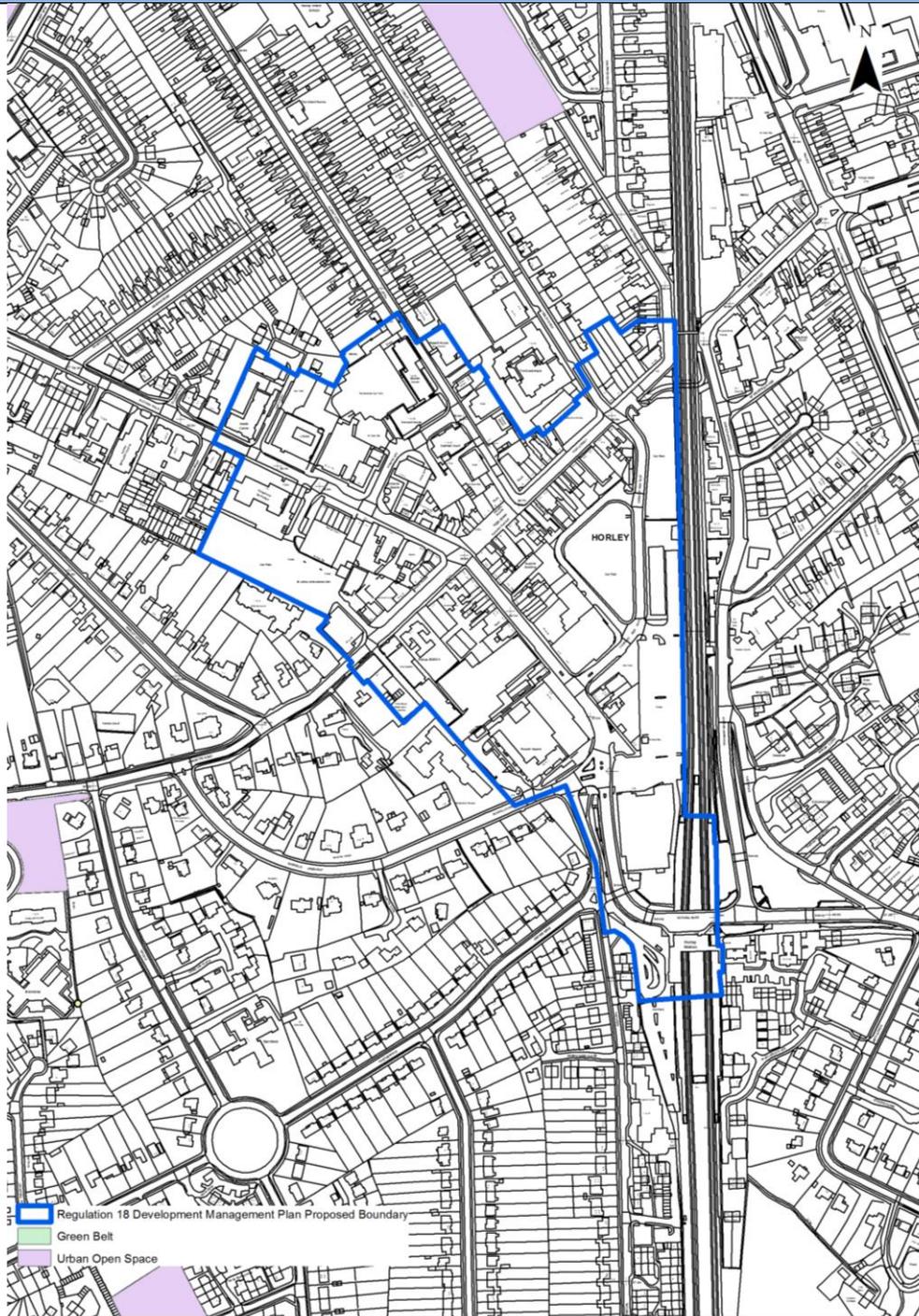
Appendix 2: Identifying Retail Warehouse Areas



Location	
Proximity to town	There are no areas – which do not have other policy considerations -

centre	near to the town centre which could accommodate a retail warehouse area.
Visual and pedestrian relationship to town centre	
Format, Scale & Type of Provision	
Accommodate large single storey unit	N/A
Possible to accommodate area greater than 700sqm	N/A
Are bulky/ specialist goods available in the town centre	N/A
Access & car parking	
Capable of accommodating good car parking provision	N/A
Conclusion	
No sites are recommended for retail warehouse designation.	

Horley



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Location

Proximity to town centre

There are no areas – which do not have other policy considerations - near to the town centre which could accommodate a retail warehouse area.

Visual and pedestrian relationship to town centre

Format, Scale & Type of Provision

Accommodate large single storey unit

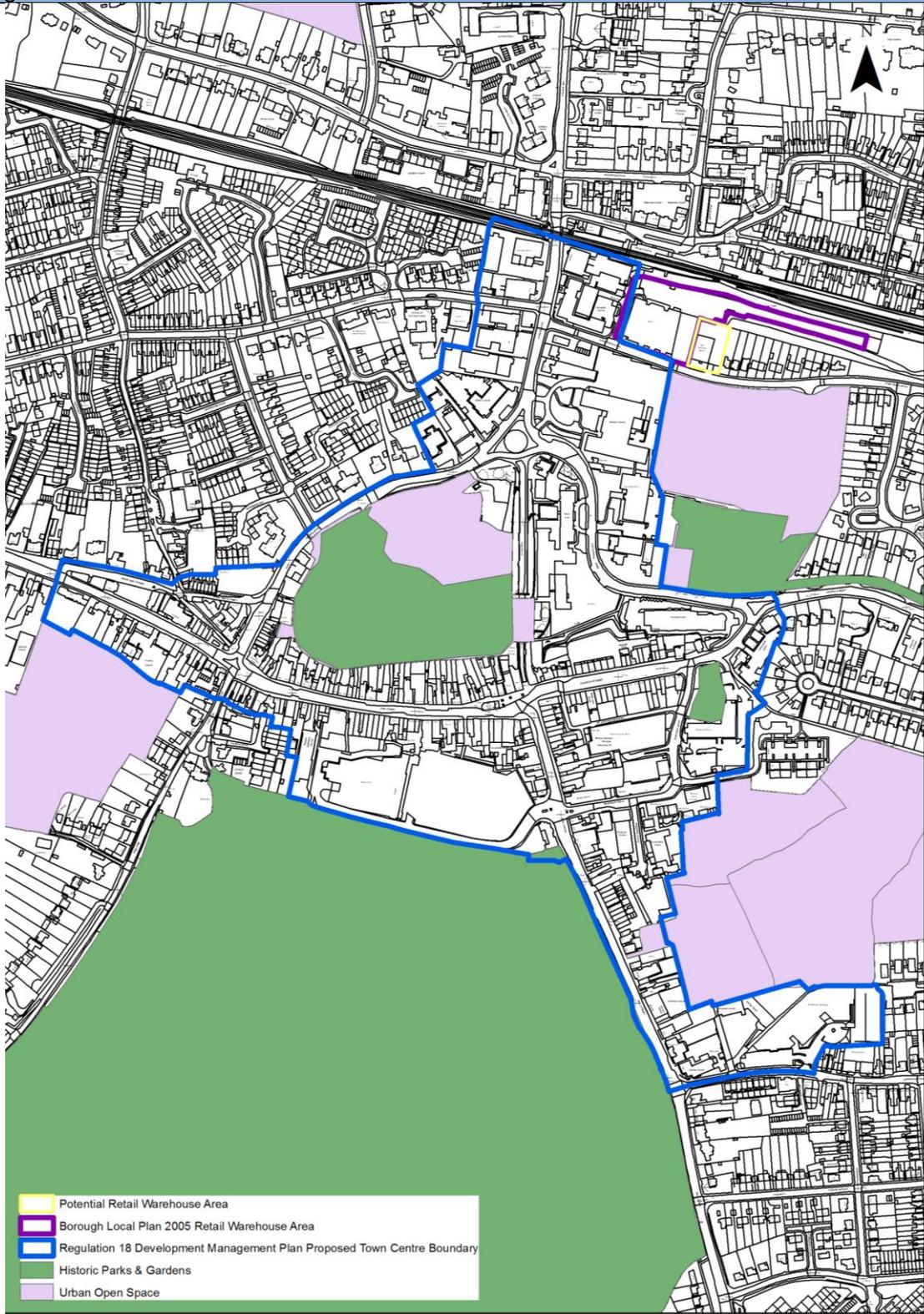
N/A

Possible to

N/A

accommodate area greater than 700sqm	
Are bulky/ specialist goods available in the town centre	N/A
Access & car parking	
Capable of accommodating good car parking provision	N/A
Conclusion	
No sites are recommended for retail warehouse designation.	

Reigate



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Location

Proximity to town centre

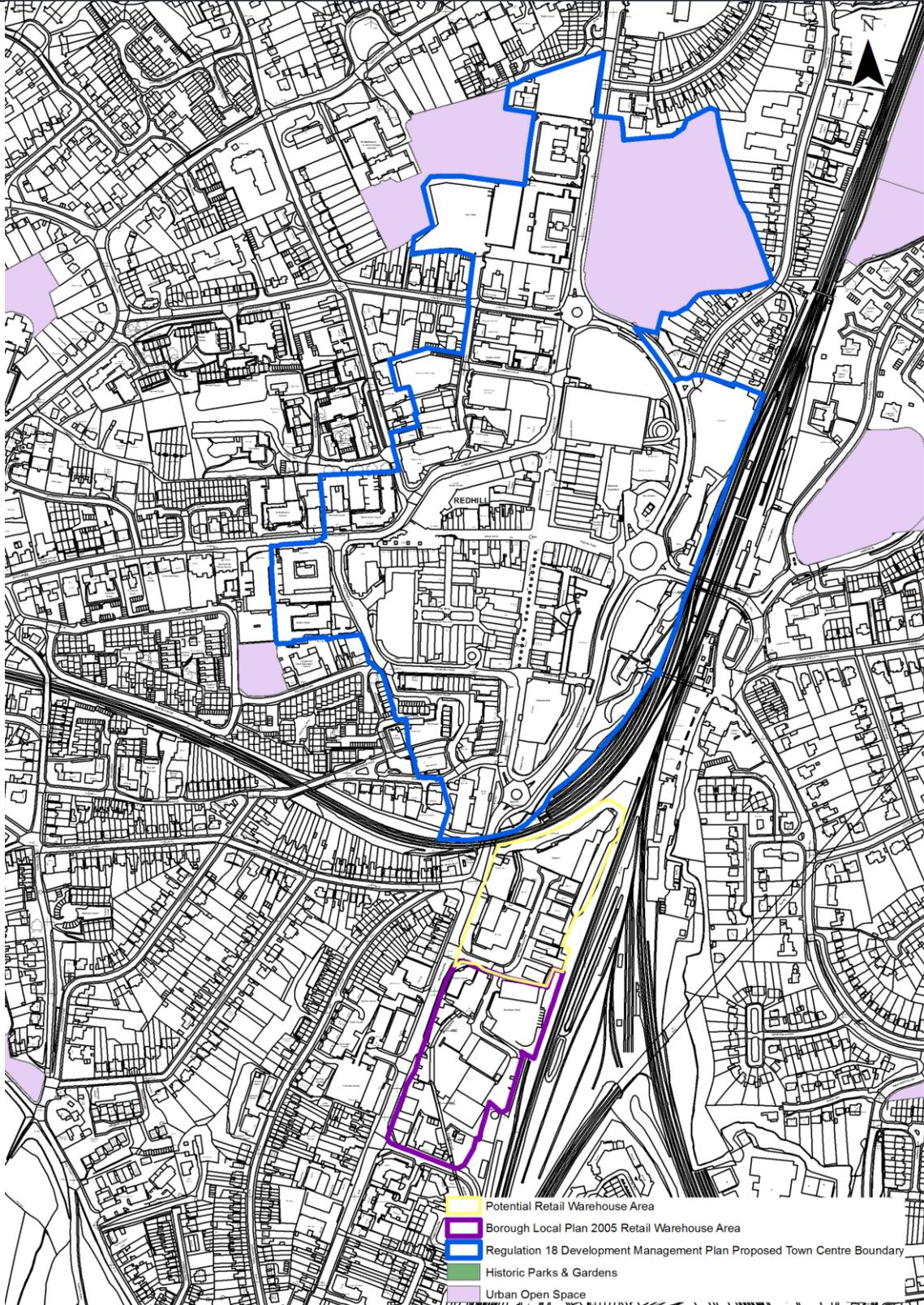
The existing retail warehouse area could possibly be extended to include the adjoining post office exchange.

Visual and pedestrian relationship to town

The area has relatively good connectivity to the town centre – it is walkable.

centre	
Format, Scale & Type of Provision	
Accommodate large single storey unit	<p>The post office exchange is currently approx. 465sqm. It would be difficult to get a good 700sqm ground floor unit plus adequate car parking on the post office site.</p> <p>There are a number of specialist goods shops within the town centre.</p>
Possible to accommodate area greater than 700sqm	
Are bulky/ specialist goods available in the town centre	
Access & car parking	
Capable of accommodating good car parking provision	<p>With a good 700sqm ground floor, it would be difficult to provide a good sized car park.</p>
Conclusion	
<p>Whilst there is potential to expand onto the adjoining post office site, it would be difficult due to size constraints. A retail impact assessment would be required to demonstrate that there would be no significant harm to the town centre.</p>	

Redhill



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Location

Proximity to town centre

There is the potential to expand to the north of the existing retail warehouse area – the Reading Arch Road Industrial Estate.

Visual and pedestrian

There is relatively good connectivity to the town centre – it is walkable.

relationship to town centre	
Format, Scale & Type of Provision	
Accommodate large single storey unit	Yes
Possible to accommodate area greater than 700sqm	Yes
Are bulky/ specialist goods available in the town centre	There are some household type goods available within Redhill town centre. There are a limited number of specialist goods available in the town centre.
Access & car parking	
Capable of accommodating good car parking provision	Yes
Conclusion	
There is potential to expand into the area to the north of the existing retail warehouse area (Reading Arch Road industrial estate). Should the area be developed as a retail warehouse area, a retail impact assessment would be required to demonstrate that there would be no significant harm to the town centre.	