



Retail Assessment

In respect of

Rustington Golf Centre
Golfers Land
Angmering
West Sussex

On behalf of

Rustington Golf Centre Limited

RPS CgMs Ref: JLC21508

April 2017

Secure & Stable
ADDING VALUE

QUALITY MANAGEMENT

Prepared by:	PA
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1 INTRODUCTION

- 1.1 This Retail Assessment has been prepared on behalf of Rustington Golf Centre Limited (the 'Applicant') in support of a planning application for a new non-food Class A1 retail unit comprising 3,807sqm GIA floorspace (including 1,393sqm mezzanine)(3,876sqm GEA) on land to the immediate south of the Rustington Golf Centre. Go Outdoors are the intended occupier of the proposed retail unit.
- 1.2 The retail unit is proposed in substitution for the consented 9 x five aside football pitches and associated football building incorporating changing facilities and a bar (the 'five aside football pitches') which form part of the consented leisure scheme for the site approved by planning permission reference no. A/77/16/PL dated 25th January 2017.
- 1.3 The necessity for the application arises due to a lack of interest expressed by potential operators for the five aside football pitches, which stems from competition from nearby established five aside football pitch operators. Appendix 1 contains correspondence from various operators confirming that they have no interest in the site.
- 1.4 It is important that a suitable replacement use to the five aside football pitches is found to ensure the overall viability of the consented leisure scheme. The football pitches provide a gateway to the leisure scheme and therefore this part of the site is strategically important in order to ensure an attractive scheme which retains the interest from the other leisure operators who have expressed interest in the hotel, trampoline building and restaurant components of the consented scheme.
- 1.5 The applicant has received specific interest from retailer Go Outdoors to operate a new store from the site to serve the Littlehampton area. Further information concerning the proposed retailer is provided within the next section of this report.
- 1.6 The proposed retailer represents a good 'fit' with the balance of the consented and existing leisure facilities and has similarities in terms of the relationship enjoyed by the American Golf store which operates from the Rustington Golf Centre. The retail unit will utilise joint car parking facilities consented as part of the leisure scheme.
- 1.7 The Rustington Golf Centre is located to the north of the A259 dual carriageway within an existing leisure complex which includes a golf centre, American Golf store, a Virgin Active leisure centre and an Out of Bounds Family Activity Centre. There have been a number of planning applications on the site over the years relating to the development of the golf course and associated leisure and recreational facilities.
- 1.8 The existing golf centre is served by circa 346 car parking spaces and is accessed via Golfers Lane, which is accessed from a roundabout off the A259. The proposed leisure scheme including the Go Outdoors will provide an additional 278 car parking spaces. The surrounding area is rural in character and is outside of the existing built-up area. Residential properties lie beyond the site to the east. The town centre of Littlehampton is 4.8 kilometres from the site and the Local Service Centre of Rustington is 1.6 kilometres away. For the purposes of planning policy, the site is defined as an out-of-centre location.

- 1.9 To the south east of the site lies the Rustington Retail Park, which accommodates a large Sainsbury's store including an Argos concession and retail warehouse units occupied by Pets at Home, Halfords and Dunelm. There is new car showroom on land to the west of the Rustington Retail Park operated by a BMW and Mini Dealership (Chandlers), having relocated from various locations around Angmering and Rustington to create a single hub. Adjacent to the car showroom is the Manor Retail Park which comprises a Next, Tapi Carpets and an Aldi foodstore.
- 1.10 Further to the west, lies another site (known as land south of New Road and East of Brook Lane, Rustington), which is proposed for the development of a Marks and Spencer Foodhall and a public house. The planning permission (A/23/15/OUT) has been subject of a successful judicial review and a further, similar but revised, planning application (A/11/17/OUT) is currently before the Council for determination. The main issue of contention relates to the sequential test.
- 1.11 The latest application attempts to address the concerns raised by the claimant (Store Property Investments Limited) in relation to the sequential test and is accompanied by a Retail Statement prepared on behalf of the applicant by Montagu Evans. Although the Statement focuses upon the assessment of a food retailer (M&S) many of its conclusions and terms of reference are applicable and relevant to the determination of the current planning application for the proposed Go Outdoors unit at the Rustington Golf Centre. Similarly, the retail assessments prepared in support of the Manor Retail Park are relevant as they model the effects of the Retail Park together with other retail planning commitments on town centres and other retail facilities.
- 1.12 Significantly, the Council has previously accepted both in relation to the Marks and Spencer proposals and those relating to the Manor Retail Park (proposed by Store Property Investments Limited) that there are no sequentially preferable sites in terms of locating a similar quantum and format of floorspace either within or adjacent to town centres (Littlehampton and Rustington). The proposed Go Outdoors store is significantly larger than the proposed M&S Foodhall.
- 1.13 Furthermore, the impact of the Manor Retail Park including that associated with subsequent variations to the consented retail floorspace to enable the occupation of one of the retail units by Next was considered acceptable and consequently no significant adverse effects are predicted to arise for town centres.
- 1.14 The current application proposals seek the creation of a new retail unit for a specialist outdoor leisure retailer (Go Outdoors). As subsequent sections of this assessment demonstrate, local town centres have a low propensity of retailers selling goods comparable to those sold by Go Outdoors. Existing leisure goods provision is largely confined to out of centre retailers (e.g. Mountain Warehouse) or retailers which sell a limited range of leisure goods as part of a much wider goods offer (e.g. Halfords, and the large supermarkets and discount food stores) and other out of centre non-retail specialists (e.g. Stockley Outdoor & Equestrian). By comparison there are few shops within town centres that sell these types of goods, the most notable being the Fishing Tackle and Bait and Clothing and Camping shops and Spokes Cycles located within Littlehampton town centre (Pier Road).
- 1.15 The application proposals have been the subject of pre-application discussions with officers from Arun District Council. The scope of this Retail Assessment has been discussed and agreed with officers and provides an assessment of sequential sites and retail impact in accordance with

national and local retail planning policy requirements. As agreed, this assessment focuses upon Littlehampton and Rustington town centres.

1.16 The remainder of this assessment is organised into the following sections:

- Section 2: The proposed development
- Section 3: Retail policy
- Section 4: Existing retail provision
- Section 5: Sequential Assessment
- Section 6: Retail Impact
- Section 7: Conclusions

2 THE PROPOSED DEVELOPMENT

- 2.1 The proposed development comprises a non-food Class A1 retail unit on land that was previously proposed to be occupied by five aside football pitches consented as part of a wider leisure scheme of development (planning permission reference: A/77/16/PL).
- 2.2 Due to a lack of interest expressed by potential five aside operators, the applicant is seeking to secure an alternative retail use of part of the site in accordance with the interest expressed by Go Outdoors, a national specialist retailer of outdoor leisure goods.
- 2.3 Although the proposed retail unit is intended to accommodate Go Outdoors, the applicant is seeking some flexibility in terms of the ranges of goods that may be sold. In addition to the ranges of goods sold by Go Outdoors (as described below) the applicant is also seeking a range of bulky comparison goods. In this respect, the required ranges of goods would include DIY, furniture, floor coverings and electrical goods etc. Such goods are predominately sold from comparable out of centre retail warehouse locations and from large foodstores serving the Littlehampton catchment area. The impact assessment duly has full regard to these ranges of goods.
- 2.4 The proposed retail unit will comprise a total of 3,807sqm GIA floorspace with 1,393sqm provided at mezzanine level. The mezzanine floor provides 58% cover and is proposed to be accessible via the ground floor sales area by means of a combination of stairs and a lift.
- 2.5 For the purposes of the impact assessment, it is assumed that the net sales area of the store will comprise 80% of the gross, i.e. 3,046sqm. Furthermore, no reduction to the sale density is proposed in respect of the turnover potential of the mezzanine floorspace. Mezzanine sales floorspace typically tends to trade at a lower sales density to ground floor sales space.
- 2.6 Littlehampton is underserved by specialist outdoor leisure retailers both in terms of in centre and out of centre provision. The nearest existing Go Outdoors stores are located at Southampton and Basingstoke, some 73km and 88km away. The sales area of the Southampton store comprises 3,161sqm, although this store was not purpose built for Go Outdoors.
- 2.7 The proposed store will assist in meeting unmet demand along the south coast for leisure goods and will help to create more sustainable travel patterns for these types of goods. In particular, the store will serve the needs of users of the South Downs National Park.
- 2.8 Go Outdoors typically require units in excess of 3,000sqm in order to provide sufficient space to display the full range of their products. Much of the sales floorspace is given over to the sale and display of large and bulky leisure goods such as tents which have a low value relative to the amount of floorspace required to display them.
- 2.9 The retail offer of Go Outdoors will complement the existing and consented leisure uses at Rustington Golf Centre.
- 2.10 Go Outdoors are primarily a bulky leisure goods retailer specialising in the sale of tents, camping, caravanning furniture and trailers and outdoor activity equipment and accessories. As the table

below shows, approximately 80% of the sales area is devoted to the sale of such goods i.e. non-bulky goods (including clothing and footwear) account for circa 20% of floorspace.

Department	Floorspace %
Boots	5
Sleeping Equipment (camp beds and airbeds, sleeping bags)	4
Rucksacks	3
Tents (frame tents, pyramid tents, trailer tents, dome tents, ridge tents/marquees)	34
climbing	2
Fishing	2
Outdoor clothing	14
Watersports	4
Equestrian	4
Cycles (including bikes)	5
Camping equipment (furniture, cooking equipment/accessories, caravan fittings/accessories, luggage trailers, store/accessories)	23
Total	100%

- 2.11 The applicant would be happy to accept a condition which limits the ranges of goods that may be sold from the unit to prevent its use for non bulky goods other than those directly related to the sale of bulky goods for example:

“The use of the retail unit hereby permitted shall be restricted to the sale of the following goods and shall be used for no other purpose within Class A1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 without the prior written consent of the Local Planning Authority. The goods permitted to be sold are: DIY and building supplies, garden supplies, carpets and floor coverings, furniture, motoring and cycling goods and accessories, electrical goods, tents, camping, caravanning and outdoor activity equipment and accessories and an associated ancillary outdoor clothing and footwear range equating to not more than 20 % of the net retail floorspace of the unit.”

- 2.12 Go Outdoors is different to typical town centre operators such as Millets, Mountain Warehouse, Blacks and Trespass where the primary focus is on the sale of outdoor clothing and footwear and smaller camping accessories. In contrast Go Outdoors stores devote considerable sales floorspace to the display of fully erected tents and other outdoor leisure equipment so that customers can experience and explore products prior to making a purchase.
- 2.13 The proposed store is anticipated to employ approximately 50 staff. Go Outdoors stores typically trade between the hours of 9am and 8pm (Monday to Friday), 9am and 6pm (Saturday and Bank Holidays) with 6 hours of trading on Sundays between 9am and 6pm.
- 2.14 According to Mintel Retail Rankings, a Go Outdoors store has an annual turnover of circa £7.5M including VAT. Having regard to the amount of floorspace proposed for the application site this equates to a sales density of circa £2,500 per sqm. This is very comparable to that achieved by bulky goods retailers which typically trade in the range of £2,500 to £3,000 per sqm. Indeed, this is directly comparable to the sales density adopted by the Arun Retail Study Update October 2016 for bulky comparison goods retailers. Accordingly, it is reasonable and robust to assess the

turnover of the proposed store on this basis. The impact assessment make allowances for improvements in the performance of the floorspace over time meaning that by 2021 (the adopted design year for the store) the sales density will have increased to £2,952 per sqm and the corresponding turnover will be £8.99M.

- 2.15 The next section of this report examines the relevant national and local retail planning policy background against which application proposals such as these needs to be considered.

3 RETAIL PLANNING POLICY

- 3.1 This section of the report provides an overview of relevant retail planning policy operating at the national and local levels applicable to the determination of the current planning application.
- 3.2 Application proposals should be determined in accordance with the policies of the development plan unless other material considerations indicate otherwise.
- 3.3 In this case, the relevant statutory development plan comprises the saved policies of the Arun Local Plan (September 2007).
- 3.4 The Council is in the advanced stages of formulating a new Local Plan. The Publication version was issued in October 2014. The examination commenced in June 2015 but was subsequently suspended in July 2015 to enable further evidence to be prepared and modifications to the Plan. Proposed Modifications were published in April 2017 for consultation.
- 3.5 The Council's emerging retail policies are supported by a detailed up to date evidence base published in the form of:
- Arun District Retail Study April 2013
 - Arun Retail Study Update 2016 (October 2016)
- 3.6 Consideration of the key findings of the evidence base and their relevance to the application proposals are duly considered in this report as appropriate.

National Planning Policy Framework

- 3.7 The National Planning Policy Framework (NPPF) was published by the Government in March 2012. The Government is currently consulting upon potential changes to the NPPF, however fundamentally these changes do not alter the Government's policy relating to economic development or town centres.
- 3.8 The NPPF introduces a presumption in favour of sustainable development, including sustainable economic development. In relation to decision making this is defined as:
- approving development proposals that accord with the development plan without delay and
 - where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or
 - specific policies in this Framework indicate development should be restricted
- 3.9 Paragraph 19 of the NPPF states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and significant weight should be placed on the need to support economic growth through the planning system. It also

states that investment in business should not be over-burdened by the combined requirements of planning policy expectations.

- 3.10 The government's policies relating to main town centre uses, including retail uses, are set out at paragraphs 23 - 27 of the NPPF.
- 3.11 Government policy affords protection to town centres by making them the first preference for new retail development (together with other main town centre uses as defined by the NPPF) and ensuring their vitality and viability is protected from potentially harmful edge and out of centre development.
- 3.12 The 'town centre' for retail purposes is defined as comprising the 'primary shopping area' consisting of the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage.
- 3.13 The NPPF encourages local planning authorities to plan proactively to meet the development needs of business. Furthermore, planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. This includes policies which promote competitive town centres that provide customer choice and a diverse retail offer. Furthermore the NPPF requires local authorities to allocate a range of suitable sites to meet the scale and type of retail development needs. The NPPF emphasises that it is important that such needs are met in full and are not compromised by limited site availability.
- 3.14 The current application proposals are broadly compliant with these national policy objectives - they will stimulate the local retail market and will provide choice and competition amongst retailers with benefits for consumers and help to promote more sustainable travel patterns for leisure goods.
- 3.15 The NPPF establishes two key policy tests against which proposals for new retail uses (proposed outside town centres and which do not accord with a specific allocation in the Local Plan) are required to be assessed, namely:
- the sequential approach to site selection; and
 - the impact test
- 3.16 Government policy affords protection to town centres by making them the first preference for new retail development and ensuring their vitality and viability is protected from potentially harmful edge and out of centre development. Accordingly, out of centre application proposals such as these are required to demonstrate that there are no sequentially preferable sites/premises that are suitable and available within and to the edge of relevant town centres.
- 3.17 The NPPF states that when considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites that are well connected to town centres. It also notes that flexibility on issues such as format and scale should be demonstrated.
- 3.18 Similarly, national policy requires an assessment of impact for retail proposals outside town centres (or not in accordance with an allocation within an up to date Local Plan) comprising

2,500sqm or more floorspace (the 'default' position), or any lower threshold set by an adopted Local Plan. The application proposals comprise 3,807sqm GIA floorspace.

3.19 Where an impact assessment is required, this should include an assessment of:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal
- 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 five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made

3.20 Finally, paragraph 27 states that "where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused." This however needs to be weighed in the planning balance with all other material considerations.

National Planning Practice Guidance (NPPG)

3.21 The NPPG was first published in March 2014, since when various parts of the guidance have been updated to reflect emerging best practice and government policy announcements.

3.22 The NPPG requires local planning authorities to take into account market signals when planning for town centres. Paragraph 2b-004 provides the following advice:

"Local planning authorities should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business."

3.23 It is therefore clear that local planning authorities need to be realistic in both plan-making and decision-taking processes and fully recognise the needs of businesses.

3.24 The NPPG further recognises that:

"It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise..." (paragraph 2b-006)

- 3.25 The purpose of searching for sequential sites is to ensure that the identified need is met in the most appropriate location (as continued to be confirmed by the NPPG and the courts). Indeed, the courts have established that the suitability of potential sites needs to be judged having regard to the nature of the need.
- 3.26 The NPPG further advises:
- “The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected to the town centre. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.” (paragraph 2b-008)**
- 3.27 The NPPG advises local planning authorities to set ‘policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan’ (paragraph 2B-009).
- 3.28 With regards to the sequential test, the NPPG notes that the local planning authority should support the applicant in undertaking the sequential test, including sharing any relevant information. The Applicant has agreed with the District Council that the search for sequential sites should be focused upon Littlehampton and Rustington, being the relevant centres for assessing the application proposals in terms of retail policy considerations. Furthermore, specific sites have been agreed to be assessed.
- 3.29 In relation to decision-taking Planning Practice Guidance makes it clear that it is for the Applicant to demonstrate compliance with the sequential test (where it is necessary to do so). Furthermore the ‘application of the test should be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites should be discussed between the developer and local planning authority at the earliest opportunity.’ (paragraph 2b-010).
- 3.30 The NPPG provides a checklist setting out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:
- **with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.**
 - **is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.**
 - **if there are no suitable sequentially preferable locations, the sequential test is passed.**

- 3.31 Whilst the NPPG states that failure to comply with the sequential test should result in refusal of planning permission, as the NPPF (the policy document) explains decision-taking should be made in light of all material considerations i.e. social, environmental and economic considerations.
- 3.32 Paragraph 2b-011 of the Guidance states that:
- “Use of 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. Robust justification must be provided where this is the case, and land ownership does not provide such a justification.”**
- 3.33 With regard to the impact test, the NPPG notes that the purpose of the test is to ensure that the impact of certain out-of-centre and edge-of-centre proposals on existing town centres is not significantly adverse. It notes that the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. In this respect the Council’s Retail Study provides an up to date assessment of qualitative and quantitative issues.
- 3.34 The NPPG prescribes (consistent with the NPPF) a series of indicators which should be used to determine the health of town centres (paragraph 2b-005) namely:
- diversity of uses
 - proportion of vacant street level property
 - commercial yields on non-domestic property
 - customers’ views and behaviour
 - retailer representation and intentions to change representation
 - commercial rents
 - pedestrian flows
 - accessibility
 - perception of safety and occurrence of crime
 - state of town centre environmental quality
- 3.35 The NPPG confirms the purpose of the impact test is to ensure that impact over time (up to five years (ten for major schemes) for certain out of centre and edge of centre proposals on existing town centres is not significantly adverse. In this respect it advises that it ‘is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas’ (paragraph 2b-013).
- 3.36 Furthermore, paragraph 2b-017 confirms that:

“As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities.”

3.37 Where wider town centre developments or investments are in progress, the NPPG advises that it will also be appropriate to assess the impact of applications on that investment. Key considerations will include:

- **the policy status of the investment (i.e. whether it is outlined in the Development Plan)**
- **the progress made towards securing the investment (for example if contracts are established)**
- **the extent to which an application is likely to undermine planned developments or investments based on the effects on current/ forecast turnovers, operator demand and investor confidence**

3.38 The Guidance provides a checklist of the steps that should be taken in applying the impact test, namely:

- establish the state of existing centres and the nature of current shopping patterns (base year)
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur
- examine the ‘no development’ scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
- assess the proposal’s turnover and trade draw* (drawing on information from comparable schemes, the operator’s benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw)
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact)
- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal’s trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres

3.39 Judgements regarding whether likely adverse impacts are ‘significant’ should be reached in light of local circumstances (paragraph 2b-018).

Arun District Local Plan 2003 Saved Policies

- 3.40 The statutory development plan relevant to the consideration of the application proposals comprises the saved policies of the Arun District Local Plan 2003 which covers the period to 2011. On the Proposals Map, the application site is unallocated, located outside of the defined settlement boundary. It is an out of centre site in retail policy terms.
- 3.41 Saved policy DEV26 (Criteria for Retail Development) states that the District Council will seek to maintain the existing hierarchy of retail centres within Arun and retail development which accords with this overall objective will be permitted provided that:
- i. it is of a high standard of design, materials and layout, and has due regard to the character of the site and its surroundings;
 - ii. it is easily accessible by public transport;
 - iii. it includes provision for access by cycle and on foot;
 - iv. it includes appropriate provision to enable access for people with disabilities; and
 - v. the design incorporates crime prevention measures.
- 3.42 These criteria are considered elsewhere within other documents submitted in support of the application proposals, for example the Design and Access Statement and Transport Assessment.
- 3.43 Policy DEV27 (Retail Development Outside the Principal Shopping Areas) states that outside the Principal Shopping Areas (as defined on the Proposals Map), proposals for non-food retail and food retail, including extensions, will be permitted provided that:
- i. the proposal does not adversely affect the vitality and viability of the Principal Shopping Areas and local shopping areas, either as an individual development or cumulatively with similar existing or proposed developments;
 - ii. it is easily accessible by the highway network and public transport;
 - iii. it includes provision for access by cycle and on foot; and
 - iv. it includes appropriate provision to enable access for people with disabilities.
- 3.44 The policy notes that applications for major development will need to be accompanied by a full assessment of the potential impact on town centres and nearby centres. Applicants proposing retail development on out-of-centre sites will need to demonstrate that no suitable sites can be found, firstly within the existing town centre or, secondly, on the edge of the centre. The policy also states that applicants will be required to demonstrate that there is a need for additional facilities which is no longer forms part of national retail policy and therefore this part of the policy is inconsistent with the NPPF.

Draft Arun District Local Plan 2011-2031

- 3.45 The Arun District Local Plan 2011-2031 was submitted to the Secretary of State for independent examination in January 2015. The examination commenced in June 2015 but was suspended in July 2015. Since when the Council has recently published for consultation Proposed Modifications to the Local Plan (April 2017).
- 3.46 In light of the above, the following policies are draft and carry limited weight in the decision making process.

- 3.47 The strategic objective for retail is stated as to “create vibrant, attractive, safe and accessible town and villages that build upon their unique characters to provide a wide range of uses and which are a focus for quality shopping, entertainment, leisure, tourism and cultural activities”.
- 3.48 Paragraph 9.1.4 identifies Bognor Regis and Littlehampton as offering a range of financial, shopping and leisure services. However both centres are noted as being smaller and provide a more limited range of shops and facilities than other centres within West Sussex, for example Chichester and Worthing town centres which act as a significant draw to Arun residents.
- 3.49 Draft policy RETSP1 (Hierarchy of Centres) notes the need to maintain the hierarchy of centres in Arun by supporting and promoting measures which reinforce their role in meeting community needs and providing a range of activities including retail, leisure, commercial, office, tourism, cultural, community and residential development.
- 3.50 The policy states that the main focus for major retail facilities will be Bognor Regis and Littlehampton. Rustington will maintain its existing role as a centre providing a good range of shops serving the local population.
- 3.51 The supporting text to the policy (paragraph 9.2.1) states that an impact assessment for retail development will be required where the floorspace exceeds 1,000 sqm, although it is noted that impact may be a material consideration at any scale and such impact assessments should be appropriate to the scale of the development and address the likely impacts relevant to the proposed development.
- 3.52 Paragraph 9.2.2 confirms that no specific provision is proposed by the Plan for further out of centre retail development on the basis of the findings of the 2013 Retail Study or 2016 update. That assessment is of course based upon a capacity assessment and has little regard to changes in demand as expressed from time to time by specific retail operators such as Go Outdoors etc.
- 3.53 Draft policy RET DM1 concerns retail development. Part 3 of the policy permits retail development outside town centres provided that the following criteria can be met:
- The scheme meets the impact tests of the NPPF
 - The scheme is easily accessible by the highway network and public transport
 - The scheme includes provision for access by cycle and on foot
 - The scheme includes appropriate provision to enable access for people with disabilities
- 3.54 Furthermore, applicants are required, in accordance with the NPPF to comply with the sequential test. Finally, the policy states that planning permission may be granted subject to planning conditions/legal agreements as appropriate to restrict the range of products sold.
- 3.55 Briefly taking each of these points in turn; section 6 of this report assesses the application proposals in terms of their effect upon town centre vitality and viability. For the reasons already explained, the nature of the proposed development means that it will have a limited effect upon town centres. Proposals such as these, as duly acknowledged by the NPPG tend to trade on a like for like basis, i.e. they compete with comparable stores selling similar ranges of goods, many

of which are located outside town centres. Consequently the impact of such facilities has long since been absorbed and town centres have adapted accordingly.

- 3.56 The submitted Transport Assessment assesses the application proposals in terms of their accessibility to public transport and the highway network and by cycle and foot. The proposed retail unit will be fully accessible by people with disabilities and appropriate car parking facilities provided.

Retail Study

- 3.57 The emerging development plan is supported by a retail evidence base published in the form of the Arun District Retail Study 2013, updated in October 2016.

Capacity Assessment

- 3.58 The 2016 Update focuses entirely upon the need (quantitative capacity) for new retail floorspace over the emerging plan period using the latest population and expenditure estimates for the adopted study area. The study area extends marginally beyond the District in order to capture any in-flows of expenditure to Arun's town centres and other retail facilities within the District from beyond. The study area is heavily influenced to the west by Chichester and to the east by Worthing which acts as significant attractions to Arun's residents.
- 3.59 The assessment is based upon the 2012 Household Survey which informed the original 2013 Retail Study. Shopping patterns within the local area have not changed significantly since the household survey was undertaken although there have been a number of retail planning commitments (duly noted by the study) which have since commenced trading including the Manor Retail Park at Rustington which lies in close proximity to the application site. Other changes have occurred in relation to the Rustington Retail Park including an enlarged Sainsbury's store and the take up of the former vacant Focus store by Dunelm.
- 3.60 It is notable that the 2016 Update shows significant growth in comparison goods expenditure per head (£3,754 per head compared to £3,043 per head in 2014, using a consistent 2011 price base).
- 3.61 In terms of retail commitments, the Manor Retail Park accounts for +£10.14M comparison goods together with Next Bognor Regis (+£4.78M) and Oldlands Farm (bulky goods + £10.92M). The latter has however not yet been built out but has recently been granted reserved matters approval (permission reference: BE/4/17/RES dated 21st March 2017). There is no indication provided of potential retailer occupiers.
- 3.62 In respect of Rustington the 2016 Study identifies an oversupply of comparison goods floorspace, mainly the result of new retail commitments arising since 2013. As such, it is stated that there is no requirement to identify additional comparison goods floorspace in Rustington. This of course is a purely quantitative exercise which has no regard to consumer choice and competition and retailer demand. Furthermore, it is based upon the assumption that the turnover of retail facilities and available expenditure are in equilibrium at the base year (paragraph 5.41 of the Study refers). Furthermore, the significant predicted growth in comparison goods expenditure is likely to mean that not all the expenditure will be taken up by committed retail development and increases in productivity of existing retail floorspace.

- 3.63 The relevant test for retail planning developments is whether the proposal would result in significant adverse impacts upon town centres. Whilst a lack of need or quantitative capacity may potentially be indicative of increased levels of impact (as trade is directly drawn away from existing retail facilities to new facilities) it does not necessarily and automatically translate into significant adverse impacts. The particular nature of proposals need to be examined carefully in light of all considerations including the ranges of goods sold and evidence of competing facilities etc.
- 3.64 Even so, the location of additional retail floorspace which is intended to serve the local area will assist in promoting more sustainable shopping trips. There is currently no dedicated specialised and comprehensive outdoor leisure retailer in the local area consequently consumers requiring such ranges of goods are required to travel outside of the District. In this respect the application proposals will assist in the retention of locally generated retail expenditure in a location which is an established leisure destination.
- 3.65 The 2016 Update does not model the effects of retail commitments in terms of their trade draw on existing retail facilities. Even so, the types of comparison goods retailer which have commenced trading, for example at the Manor Retail Park, will not have substantially affected shopping patterns in terms of local town centres (Littlehampton and Rustington).
- 3.66 The 2016 Update shows that there will be growth in comparison goods retail expenditure of £101.68M over the period 2017 – 2021. Of which £46.6M is accounted for by comparison goods retail commitments (Appendix 3, 2016 Retail Study Update).

Survey Derived Turnover of Retail Facilities

- 3.67 The 2013 Study provides a survey derived indication of the turnover of comparison goods retail facilities within the adopted study area and beyond. The table below provides a summary of the turnover of retail facilities according to the survey results.

Centre/Facility	Survey Comparison Goods Turnover (2013)(2011 prices)	Derived Goods £M (2011 prices)	Arun Residents £M (2013)(2011 prices)
Bognor Regis	£58.95M		£58.35M
Littlehampton	£22.17M		£21.88M
Rustington	£16.80M		£16.29M
Chichester City Centre	£98.06M		£95.60M
Worthing Town Centre	£141.39M		£51.92M
Bognor Regis out of centre	£27.23M		£27.23M
Littlehampton out of centre	£19.87M		£18.77M
Chichester out of centre	£13.59M		£12.67M
Worthing out of centre	£37.17M		£8.11M

Source: Arun District Retail Study 2013, Table 18

- 3.68 The 2013 Retail Study explains (paragraphs 5.39) that the turnover of out of centre retail facilities at Rustington Retail Park were not captured by the household survey given the specialist nature of the retailers (Halfords, Pets at Home and the vacant former Focus unit). Furthermore, the

Retail Study has no regard to the planning permission granted in respect of the Manor Retail Park or indeed the reoccupation of the former Focus store at the Rustington Retail Park by Dunelm. Dunelm is a retailer of bulky goods including furniture and homewares, textiles and household goods. The Manor Retail Park provides a range of bulky and non-bulky comparison goods (Next and Tapi Carpets) and convenience goods (Aldi). Aldi also sell a range of special buy and seasonal goods including clothing, DIY and gardening goods.

- 3.69 The 2013 Retail Study, based upon the household survey, indicates that Littlehampton achieves just a 4% market share of non bulky goods and 13% of bulky goods expenditure. Similarly, Rustington achieves a 3% market share of bulky and non-bulky comparison goods expenditure. In comparison, Bognor Regis attracts a 10% non-bulky share and 22% bulky share of expenditure, the latter reflecting the significant concentrations of retail warehouses situated along the Shripney Road on the periphery of the built up area of the town.
- 3.70 Finally, neither the capacity assessment nor the turnover of existing retail facilities has any regard to the significant amount of tourist expenditure in the local area. The Retail Study recognises at paragraph 5.55 that tourism is an important factor in the economy of Bognor Regis, Littlehampton and Arundel.

Town Centre Audits

- 3.71 The 2013 Retail Study provides health check analysis for the main town centres within the District. The following paragraphs briefly summarise the key findings in relation to Littlehampton and Rustington town centres. RPS has conducted its own audits of these town centres in April 2017 and our findings duly inform the retail impact assessment conduction in section 6 of this report.
- 3.72 Littlehampton is identified as the second largest town centre within the District after Bognor Regis. GOAD survey information indicates that the town centre had a vacancy rate of 18.3% based on the number of units in 2010 (compared to the then national average of 14%). However, subsequent surveys by the Council's retail planning consultants identify just 9 units as vacant which is below the national average.
- 3.73 The overall town centre has a total of 218 units of which 6.8% of units were in convenience and 28% in comparison goods use with a further 46.7% used for retail services and other uses. Significantly the town centre is recorded as having a significantly below the national average number of units occupied by comparison goods retailers. Conversely the number of units in service use is significantly above the national average.
- 3.74 The 2013 Study notes at paragraph 4.39 that "the nature of retailer representation in Littlehampton is considered reflective of its role and function". Furthermore, "overall, the centre lack other comparison anchors given the limited choice of multiple retailers,....but compensated for by a higher level of independent retailers and services."
- 3.75 At the time the 2013 Study was prepared, Waitrose were present in the town centre which was recorded as a positive benefit to the town centre. Since then Waitrose has vacated its premises and relocated to the former Coop store in Rustington town centre. The former Waitrose store in the town centre remains vacant despite active marketing. Lidl has opened a store to the edge of

the town centre which in addition to the in centre Sainsbury's helps to compensate for the loss of Waitrose thereby retaining some convenience goods expenditure.

- 3.76 The centre is noted as having an underlying weakness in terms of its ability to attract new multiple retailers which are required to attract greater footfall and retain local expenditure (paragraphs 4.42 refers). In particular the proximity of Littlehampton to the higher order centre of Worthing means that attracting new retailers is a major challenge, but is not unique to Littlehampton.
- 3.77 The Retail Study concludes with the following remarks, "...there is considered to be goods potential to address underlying weaknesses in Littlehampton through qualitative improvements and a proactive and targeted promotion of Littlehampton for retail and leisure uses. This includes the opportunities for new development offered by town centre sites, particularly St. Martin's car park, which can better meet the accommodation needs of modern occupiers. This is considered a priority for the town if Littlehampton is to maintain its market share."
- 3.78 Similarly, in relation to Rustington, at the time the GOAD survey was undertaken (2010) the centre was identified as having a vacancy rate of 8.3% of units, with 11.7% of units in convenience and 35% in comparison use. A further 45% of units were in service/other uses. At the time the survey was undertaken, the main convenience store was operated by Coop, now Waitrose (having relocated from Littlehampton). Indeed, this change in operator is likely to be significant in terms of the findings of the shopper survey which at the time confirmed "high levels of satisfaction with the range and choice of non food shops in the centre and to a lesser extent, the choice and quality of supermarkets. An even higher level of satisfaction was outlined in terms of the choice and quality of service facilities."
- 3.79 The survey undertaken by the Council's retail consultants identified just 5 vacant units within the centre in 2013, half the number of units identified by GOAD in 2010. Similarly the RPS survey of the centre in April 2017 recorded just 4 vacant units pointing to the popularity of the centre with local residents.
- 3.80 The Retail Study notes that Rustington is characterised by good levels of independent and specialist retail provision for a centre of its size. Furthermore, the overall configuration of the centre is characterised by predominately small units of a similar size given the purpose built nature of the parade which support many independent retailers which contribute to the character of the centre (paragraph 4.57 refers).
- 3.81 In particular, the environmental quality of the centre is highlighted as being attractive and characterised by a 'garden village' feel and sense of place with established planting and trees which separate the parades from the highways (paragraph 4.62 refers).
- 3.82 The health check also makes reference to out of centre retail provision focused at the Rustington Retail Park including the redevelopment of the Sainsbury's store and the Halfords and Pets at Home and former Focus DIY store (now Dunelm). The Council's retail consultants note at paragraphs 4.64 that Rustington town centre is a healthy and well performing centre which benefits from a good level of comparison, convenience and service provision. Furthermore, the "centre is compact but achieves a good level of vitality and viability reflecting its location in a substantial and relatively affluent residential area, easy accessibility by car and excellent levels of

free car parking provision...". The consultants also note that the centre benefits from active management which helps promote the centre as a vibrant and attractive retail destination.

Summary

- 3.83 The above commentary identifies the relevant national and local retail planning policies applicable to the consideration of the application proposals, namely the sequential and impact tests. In addition, a summary of the key findings of the Council's retail evidence base is provided. In respect of Rustington, the evidence points to this being a strong, well managed and popular centre. Its retail offer has been enhanced through the addition of Waitrose, relocating from Littlehampton to the former Coop store. Littlehampton is also a popular centre but has a more tourist focus with a significant number of service uses including public houses and restaurant. The Retail Study identifies opportunities for improvement in order to attract higher order comparison anchor retailers through potential redevelopment opportunities to enable the provision of modern and larger retail units adjacent to the established primary shopping area. Notably, there are a number of identified recent retail commitments which absorb much of the predicted growth in comparison goods retail expenditure. Many of these commitments have since been built out (including Manor Retail Park, Rustington Retail Park) whereas others remain extant (e.g. Oldlands Farm Bognor Regis).
- 3.84 The next section of this report provides an overview of existing retail facilities based upon RPS surveys undertaken in April 2017.

4 EXISTING RETAIL PROVISION

- 4.1 This section provides information on the existing distribution of retail facilities in proximity to the application site with particular focus upon Littlehampton and Rustington.
- 4.2 RPS has conducted surveys of Rustington and Littlehampton town centres as well as the main out of centre retail facilities located within the District.

Town Centres

Rustington

- 4.3 Rustington comprises a purpose built and managed town centre which is popular with the local residential population for both convenience and comparison goods shopping and service facilities. The centre is well maintained. The centre comprises a good mix of national multiple retailers and independent specialists.
- 4.4 The main convenience outlets are operated by Waitrose, Iceland and Tesco Express. In addition there are a range of independent fruit and vegetable retailers, butchers and bakers.
- 4.5 Similarly there is good range of shops selling comparison goods including some national high street multiple retailers such as Boots, Superdrug, The Works, The Original Factory Shop, Card Factory etc. There are also a number of independent retailers including Clarks Stationers, L Guess Jewellers, Owen Electrical and Hanwells Homestore.
- 4.6 The centre includes a significant array of local service uses including banks and building societies, a post office, hair dressers and estate and travel agents. There are a number of coffee shops and cafes but a limited number of restaurants and public houses.
- 4.7 The town centre has a plentiful supply of off street managed free car parking with good access to the shops. There is also a town centre information office. Paving is of good quality throughout and the centre has a pleasant environment with visitors separated from through traffic. The centre is serviced by local bus services. The town has an attractive and welcoming appearance enhanced significantly by areas of landscaping.
- 4.8 The centre has very few vacancies, details of which are summarised in the table below. In all but one case the units are being actively marketed and one let has been agreed. RPS previously surveyed the centre for vacant units in March 2016. The current level of vacant units is an improvement on those identified last year as part of the Leisure Assessment undertaken by RPS in support of the consented Leisure scheme at Rustington Golf Centre.

Address	Comments	Size sqm
Broadmark Parade	Ground floor retail unit with residential flat above. Let agreed. Class A1	52sqm
Susie Bluebell	Former Susie bluebell baby clothing. To let via Stiles Harold Williams. Class A1	65sqm
Church Road	Former Leaders Estate Agent – relocated. To let via Stiles Harold Williams. Class A2	62sqm
The Street	Former Blazing Saddles cycle shop. No agent details	90sqm

- 4.9 In summary, there can be little doubt having regard to the above observations and the commentary provided in the Council's retail study and other reports prepared in respect of recent retail planning applications that the centre is performing well in terms of its role and function within the retail hierarchy. The centre has a strong retail offer and is attractive to both consumers and retailers alike.

Littlehampton

- 4.10 Littlehampton town centre is characterised by a pedestrianised high street which contains a range of comparison and convenience goods multi-national and independent retailers. There is also a significant service sector provision particularly in relation to a food and beverage offer with a range of pubs (including a J D Whetherspoon), restaurants, takeaways, coffee shops (including Costa, Greggs) etc. There are also a number of banks and building societies (Barclays, Halifax, Lloyds, Kent Reliance and Natwest). There are a limited number of charity shops including those operated by Scope and Banardos.
- 4.11 The pedestrianised area of the high street includes a number of seating areas and local coffee shops and cafes have external seating areas which help enliven the street scene. The town has a visitor information centre situated close to the quay side near the lifeboat station.
- 4.12 The town centre is generally well maintained and there is a good supply of on street and off street car parking. The main car parks comprise St. Martins which lies to the rear of shops fronting the High Street and Manor House Car Park located to the western end of the High Street. In addition, the former Waitrose store has a small car park serving the wider town centre. There is also a small car park situated on Surrey Street.
- 4.13 The District Council offices are located within the town centre to the west on Maltravers Road close to the roundabout junction with Beach Road.
- 4.14 The main convenience goods provision is in the form of a Sainsbury's supermarket, Iceland and Lidl. Previously Littlehampton had a Waitrose and Morrison's M Local but both have ceased trading and the former units remain vacant. Additional out of centre provision is provided in the form of a Tesco and Morrison's superstores. There are also a number of independent convenience goods retailers.
- 4.15 There are a range of national comparison goods retailers including, Bon Marche, WH Smith, M & Co., Card Factory, The Works, Boots, Superdrug and Holland and Barrett. There are a range of independent retailers including some bulky goods retailers selling furniture and electrical goods.

- 4.16 The table below summarised the position regarding the number (12 units), size and distribution of vacant units within Littlehampton town centre as at April 2017. The most significant vacancy relates to the former Waitrose store in Littlehampton town centre following their relocation to Rustington. Further discussion relating to this site is set out within the sequential site and retail impact assessment conducted within the following sections of this report.

Retailer	Comments	Size sqm
Anchor Springs	Former cycle shop.	30sqm
Church Street	Michael Jones Agents. In process of refurbishment. Class A1/offices	45sqm
Littlehampton Market, High Street	New build ground floor commercial unit. Class A1/B1	307sqm
22 Beach Road	Retail unit under offer. Michael Jones agents.	40sqm
Former HSBC bank, High Street/Clifton Road	No agent details. Former bank	120sqm
High Street	Baguette Me Not. Appears to be vacant. No agent details.	20sqm
Surrey Street	Former King and Chasemore estate agents. No agent details.	100sqm
12 Surrey Street	Brierley & Coe agents. Former Morrisons M Local store. Class A1	231sqm
Surrey Street	Former Littlehampton Market	200sqm
Surrey Street	Former Arun Clothing. Agent Molica Franklin.	60sqm
High Street	Former Denny's Den. Agent Molica Franklin.	40sqm
Avon Road	Former Waitrose store. Agent Colliers International. Sub-lease expiring 24 th December 2020. 95 car parking spaces.	2,377sqm GIA (1,760sqm ground, 617sqm first floor)

- 4.17 The vacant units are dispersed throughout the centre, although Surrey Street has the greatest concentration of vacant units in relative proximity to each other, albeit none are adjoining units. The current level of vacant units is similar in number to those identified last year as part of the Leisure Assessment undertaken by RPS in support of the consented Leisure scheme at Rustington Golf Centre. Many of the vacant units are different to those previously identified suggesting a 'churn' of shops which does not point to any long term vacancies (save Waitrose) with a range of new operators coming forward to fill voids. However, for various reasons, new vacancies are occurring within the centre. It is of course important for there to be a supply of some vacant units in order for towns such as Littlehampton to attract new retail and service operators. Even so, the number of vacant units remains below the national average.
- 4.18 In summary, the centre has few vacancies and is popular with local people. The town centre benefits from large parts of the high street being pedestrianised. The centre is popular with tourists visiting the south coast and the town has developed a significant food and beverage offer. The centre suffers in terms of its ability to attract multiple national retailers given its proximity to the competing higher order centres of Chichester and Worthing. Despite this competition, there are a limited number of vacant units within the town centre. These are generally small and dispersed throughout the centre and do not point to a significant problem. Sites to the north of the town centre offer potential redevelopment opportunities but without

significant retailer/developer interest it is difficult to envisage the form or indeed the timing of such development. These sites currently are poorly integrated with the existing primary shopping area of the town and this is perhaps reflective of Waitrose's decision to relocate to Rustington.

4.19 **Retail Warehouses & Large Foodstores**

4.20 There are a number of retail warehouse and large foodstores located within the District. These are predominately located to the edge of Bognor Regis (Shripney Road), Littlehampton (Littlehampton Retail Park) and Rustington (Rustington Retail Park and Manor Retail Parks).

4.21 The table below summaries the extent of provision including the ranges of goods sold which overlap with the product ranges sold by Go Outdoors.

Location	Retailer	Range of Goods Sold (bold text denotes comparable goods to Go Outdoors)
Rustington Retail Park, Rustington	Sainsbury's inc. Argos	Sainsbury's – limited range of leisure goods, electrical, homewares, kitchenware Argos – extensive range of comparison goods including electrical, furniture, homewares, leisure goods including tents, fishing, cycles, outdoor clothing and footwear
	Dunelm	Furniture and homeware homes, kitchenware, furnishings, textiles,
	Halfords	Automotive goods, bicycles, tents and camping equipment, caravan accessories, outdoor and cycle clothing
	Pets at Home	Pets and pet related products
Manor Retail Park, Rustington	Next	Clothing and homewares, furniture and furnishings
	Tapi Carpets	Carpets and floor coverings
	Aldi	Convenience goods with special offer and seasonal discount comparison goods including ranges of outdoor clothing and footwear, camping equipment etc (from time to time)
Haskins Roundstore, Angmering	Mountain Warehouse	Outdoor clothing and footwear, tents and camping equipment and accessories
	Hobby Craft	Arts and craft goods
Littlehampton Retail Park	Tesco	Convenience goods and limited range of comparison goods
	Wickes	DIY and related goods
	Currys	Electrical goods
Oldlands Way	B&M Homestore	Mixed retailer of convenience and comparison goods, clothing, garden goods,

		bicycles, outdoor clothing and footwear
Shripney Road	Sainsbury's including Argos	Sainsbury's – limited range of leisure goods, electrical, homewares, kitchenware Argos – extensive range of comparison goods including electrical, furniture, homewares, leisure goods including tents, fishing, cycles, outdoor clothing and footwear
	Topps Tiles	Wall and floor tiles and coverings
	Bath Store	Bathrooms
	Tesco	
Arun Retail Park	M&S Foodhall	Convenience goods
	Carpetright	Carpets and floor coverings
	Pets at Home	Pets and pet related products
	Next	Clothing and homewares, furniture and furnishings
	B&Q	DIY and garden goods
Bognor Regis Retail Park	Lidl	Convenience goods with special offer and seasonal discount comparison goods including ranges of outdoor clothing and footwear, camping equipment etc (from time to time)
	Matalan	Clothing and footwear, homewares, kitchenware
	Home Bargains	Mixed retailer of convenience and comparison goods,
	Dreams	Beds and furniture
	Halfords	Automotive goods, bicycles, tents and camping equipment, caravan accessories, outdoor and cycle clothing
	Bensons for Beds & Ponden Home Stores	Beds, furniture and home furnishings, textiles
Littlehampton edge of centre	Carpetright	Carpets and floor coverings

Vacant Retail Warehouse Units/Commitments

- 4.22 There are currently no vacant retail warehouses or foodstores located outside town centres.
- 4.23 There is only one major comparison goods retail commitment that remains extant and therefore capable of implementation and this relates to Oldlands Farm on the outskirts of Bognor Regis close to the existing concentration of retail warehouses at Shripney Road. The site occupies an out of centre location and in this respect is not sequentially preferable to the application site.

- 4.24 A hybrid planning permission including outline consent for Class A1 bulky goods retail floorspace was approved by a decision notice dated 19th March 2014 (reference: BE/61/13). Subsequent reserved matters approval was granted on 21st March 2017 for 4,366sqm net sales area (decision reference: BE/4/17/RES). The approved floorspace comprises 2,508sqm floorspace at ground level with a further 1,258sqm mezzanine floorspace and a 600sqm garden centre. In this respect it is clear that the proposals are pitched to accommodate a potential future requirement from a DIY operator however, such interest remains suppressed at the current time meaning that if the retail floorspace is built out it is likely to be sub-divided for occupation by multiple retailers. The reserved matters application is not linked to a particular retail occupier.
- 4.25 The outline planning consent is controlled by a number of conditions which restrict the use of the Class A1 floorspace. Condition 43 imposes a minimum unit size of 600sqm for two retail units and all other retail units (assuming the consented floorspace is sub-divided to form more than one unit) must not be smaller than 929sqm GIA. Condition 47 imposes a restriction upon the range of goods which may be sold from the retail unit(s) to:
- DIY and/or garden goods;
 - Household furniture, furnishings and textiles
 - Kitchen furniture and kitchware
 - Electronic goods
 - Carpets, wall and floor coverings
 - Automotive accessories and bicycles
 - Leisure goods
 - Camping goods
 - Pets and pet supplies
 - Office furniture and supplies; and
 - Arts and craft materials and supplies.
- 4.26 Although reserved matters approval has been given there is no indication that the retail unit will be built out in the near future in the absence of specific demand from retailers.

In Centre Comparable Goods Provision

- 4.27 RPS has undertaken a survey of Littlehampton and Rustington town centres in order to establish the extent of retail floorspace given over to the sale of leisure goods comparable to the range of goods sold by Go Outdoors. The only retailer selling a limited range of goods comparable to Go Outdoors in Rustington is the Original Factory Shop which includes some seasonal camping, cycling and related goods. These are sold as part of a much wider retailer offer. A summary of our findings in respect of Littlehampton is set out in the table below.

Retailer & Location	Range of Goods	Size sqm
Spokes, 6 Beach Road	Cycles and accessories	80sqm
Tropicana of Littlehampton trading at Clothing & Camping	Outdoor clothing, camping, footwear and accessories	120sqm
Tropicana of Littlehampton, trading as Fishing Tackle & Bait	Fishing goods	120sqm

4.28 In the case of the three retailers identified, each is a specialist in their own right. The retail offer in each case is not part of a broader product range.

4.29 In terms of bulky goods, there are a limited range of shops selling these goods, the key retail offer of each town comprises the following:

Rustington

- Original Factory Shop (furniture, electrical, soft furnishings)
- Hanwells (homewares, hardware, garden and DIY goods)
- Colliers Carpets and Flooring
- Owen Electrical (electrical goods)
- Country interiors (Furniture and Carpets)
- CM Smith & Son Furnishing Specialists
- Windsor Kitchen Bathroom and Bedroom Showroom

Littlehampton

- Dean Carpets (carpets and floor coverings)
- Arun Furnishers (Beds, furniture)
- Lidl (seasonal special buys inc DIY, garden and leisure goods)
- Bunces Home Hardware
- R & A Television (electrical goods)

4.30 In summary, this section of the report describes the existing retail provision within Littlehampton and Rustington and provides an overview of their vitality and viability. Both centres are healthy and contain few shops which sell comparable goods to those proposed to be sold by the application proposals. This sets the context within which the application proposals need to be considered in terms of both the sequential and impact tests. Such considerations are subject of the next sections of this report.

5 SEQUENTIAL TEST

- 5.1 In conducting the assessment of sequential sites, RPS has had regard to the policy test prescribed by the NPPF and the guidance set out within the NPPG as described within the previous sections of this report. In addition, RPS has had full regard to relevant case law which has provided clarification on the application of the sequential test to retail proposals such as these.
- 5.2 The judgement in respect of *Tesco Stores v Dundee City Council* is of particular relevance to the application of the sequential test where the retailer is known. Paragraph 37 of the judgement confirms “It is the proposals for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre.”
- 5.3 The ‘need’ in respect of a proposed development is therefore important in terms of informing the sequential assessment. The assessment needs to be undertaken having regard to ‘flexibility’. The type and scale of retail need sets the parameters for site identification.
- 5.4 There are location specific considerations in this case, which dictate that the provision of the proposed retail floorspace elsewhere would not address the particular need i.e. the proposals are required to provide a viable alternative use in substitute for the consented five aside pitches and building. In the absence of the proposed retail use, the balance of the consented leisure scheme would not be viable and consequently the scheme would not be built out despite significant interest from operators to occupy the other components of the consented leisure scheme.
- 5.5 The Go Outdoors requirement is specific to Littlehampton which is intended to maximise its proximity to the South Downs National Park. The nearest Go Outdoors store is located at Southampton. There are no direct comparables to Go Outdoors within the Littlehampton area and the proposals will therefore make a significant contribution to help create more sustainable shopping patterns for outdoor leisure goods within Arun District.
- 5.6 Go Outdoors require a store which comprises at least 3,000sqm floorspace to enable their full range of goods to be sold and displayed. Good access to the local highway network is also required. Go Outdoors require a location adjacent to other retailers including retailers selling comparable ranges of goods and/or compatible leisure uses as this helps to stimulate competition and drive sales. In addition, given the bulky nature of many products there must be good access to adjacent car parking facilities to enable customers to easily transport their purchases from the store to their vehicles together with suitable servicing/delivery arrangements.
- 5.7 Notwithstanding the view that only the application site can meet the identified need RPS has conducted a sequential assessment which examines sites and premises within Littlehampton and Rustington town centres. These centres have been agreed with the Council’s planning officers as being the appropriate centres within which to search for sequential sites. The assessment is set out below.
- 5.8 RPS has considered the following principal matters:-

- Proximity and linkage to the town centre and other uses;
- Accessibility to the road network and accessibility to the resident population and the surrounding area;
- Land ownership and assembly issues;
- Need for 'flexibility' in format without compromising the retail offer;
- Site constraints, including availability, site size, topography, planning policy objectives etc;
- The need for flexibility in determining the format of design and scale of development; and
- Development plan allocation and impact on the development plan strategy

5.9 The assessment has been conducted with specific reference to:

- Availability
- Suitability
- Viability

5.10 In the interests of a robust approach, the search for sequential sites included all sites and premises within and to the edge of town centres.

5.11 The sequential test requires realism from both the local planning authority and developers and it is important to ensure that a site can accommodate the development as proposed although having regard for the need to be flexible. In this respect the proposed store comprises 3,807sqm GIA floorspace however the sequential assessment has been conducted on the basis of sites capable of providing 3,000sqm floorspace together with access to nearby car parking facilities. The application proposals already demonstrate an element of flexibility through the use of mezzanine retail floorspace meaning that the proposed store's footprint is efficient in terms of land take.

5.12 Potential sites have been identified by reference to the development plan and other relevant Council documents together with surveys of the town centres undertaken by RPS in April 2017. The consideration of specific sites has also been agreed with planning officers. RPS has also considered whether there are any existing vacant retail warehouse units within the District that might be capable of accommodating the application proposals including retail commitments which might be considered sequentially preferable to the application site having regard to the factors outlined above.

5.13 In addition, RPS considered whether there are any vacant units within town centres which might be suitable and available to accommodate the proposed development. As evidenced by the previous section of this report, vacant units within Rustington and Littlehampton town centre (save the former Waitrose store which is considered below) are small (typically <100sqm) and are not of a sufficient size to accommodate the application proposals even in a flexible form.

5.14 The following sites have been identified for assessment:

Rustington

- Car Showroom, Ash Lane

Littlehampton

- Former Waitrose, Avon Road
- St. Martins Car Park

5.15 The assessment of each site is set out below.

Former Waitrose, Littlehampton

- 5.16 This site comprises the former Waitrose store and associated customer car park located within Littlehampton town centre. The site is located to the north of shops comprising part of the High Street. The store is somewhat divorced from the main retail circuit of the town centre, located between the rear of high street shops and the main town centre car park. There are a number of bus stops adjacent to the store.
- 5.17 Waitrose relocated from Littlehampton to the former Coop store in Rustington town centre in summer 2015. The former Waitrose site has remained vacant since then although the customer car park currently continues to provide free car parking facilities for visitors to the town centre.
- 5.18 The site has been subject to considerable assessment as part of previous and current planning applications proposing new out of centre retail development. Indeed, most recently the site is assessed as part of the Retail Statement dated March 2017 prepared by Montagu Evans in respect of the proposed Marks & Spencer Foodhall at Rustington.
- 5.19 The site is currently being actively marketed by the landlord/leaseholder through commercial agents Colliers International as a prominent town centre food store / large retail unit with options for adaption and sub-division available.
- 5.20 The accommodation is arranged over two floors with approximately 1,760sqm on the ground floor with 617sqm at first floor, in addition to which there is an adjacent 95 space customer car park.
- 5.21 The amount of available retail floorspace is considerably smaller than that proposed by the application proposals (some 1,430sqm smaller).
- 5.22 Even if the site is assessed flexibly, Go Outdoors has a minimum floorspace requirement of 3,000sqm, meaning that the unit is still some 623sqm too small. Consequently the former Waitrose unit is too small to accommodate the proposed Go Outdoors unit. Go Outdoors would not be able to sell and display its entire products range meaning the unit would not provide a viable proposition. Furthermore, the Waitrose store has a lack of prominence required by the retailer and does not benefit from the required proximity to existing or planned leisure uses. The unit would also not fulfil the specific need identified in relation to finding a viable alternative to the consented football scheme.
- 5.23 Historically, it is understood that there have been some offers from retailers relating to the former Waitrose store however these have not been taken forward as the rental levels have not been

palatable to the landlord. Some of these have been in the form of the proposed sub-division of the store.

- 5.24 The Waitrose store is understood to be owned by Store Property Investments Limited with a lease expiring on 24th December 2020. We understand that Waitrose still has an active rental commitment in respect of their former store until the expiry of the lease.
- 5.25 The 2016 Update Retail Study makes the following observations in respect of the former Waitrose Store, “it is unlikely that the former Waitrose premises in Littlehampton will be occupied by a convenience goods retailer although the unit might be attractive to a general discounter such as Home Bargains or B&M, which has some convenience goods floorspace. It is more likely to contribute to meeting the comparison goods floorspace needs as identified as emerging towards the end of the plan period.” (paragraph 3.4 refers)
- 5.26 Having regard to the above observations, whilst the store is available albeit on a short lease basis which runs until the end of 2020, it is not of a sufficient size to accommodate the application proposals even in a flexible form. Accordingly the former Waitrose store is not sequentially preferable to the application proposals.
- 5.27 The most likely re-use of the store would potentially be derived through its sub-division or its incorporation as part of a wider scheme of mixed use development together with the adjacent St Martins Car Park. The appetite for such development remains to be seen (having regard to the length of time the unit has remained vacant and the vision for the adjacent car park) and this will ultimately be driven by demand expressed by potential occupiers.

St Martins Car Park Site, Littlehampton

- 5.28 This site comprises the St Martins Car Park Site which extends to 0.77ha hectares. The site is currently in use as a surface level pay and display public car park serving shoppers and visitors to Littlehampton and includes a tyre fitting centre. The car park includes visitor information boards and public toilets. The car park backs on to the rear of shops located along the pedestrianised part of the High Street. The site lies outside the primary shopping area but within the town centre boundary, it is an edge of centre site.
- 5.29 The site has been identified for a number of years as a potential development opportunity, with particular scope to provide modern retail anchor units with a view to attracting new high street fashion comparison goods retailers to the town. Although there is direct access to the car park from the Sainsbury’s foodstore, the site is divorced from the main retail circuit of the town centre which would require some significant remodelling to ensure that any retail development is fully integrated with the primary shopping area of the town centre.
- 5.30 The majority of the car park is within the Council’s ownership with the exception of a Tyre Centre, which is fully operational and within third party ownership.
- 5.31 The car park is identified as a key opportunity site in Littlehampton Vision document and benefits from a development brief (2009) which considers the site to be an area of opportunity for enhancing and improving the retail offer. Any development will need to balance the use of the site as the main car park for the centre requiring the retention of the car parking.

- 5.32 The site is currently in active use as the main visitor car park serving the town centre and in this respect it is not available for the proposed development. Whilst other car parking facilities are available, these are not as convenient. The development aspirations for the site require the retention of car parking and this is likely to require the costly provision of multi-storey or under-croft car parking. Similarly, part of the site is in use by a third party as a tyre centre. Accordingly the site cannot be considered to be available for the proposed development.
- 5.33 The proximity and linkages of the site to the nearby vacant former Waitrose store means that any development would need to be comprehensively planned in order to maximise benefits. Uncertainties regarding the former Waitrose store cast further doubt regarding the availability of the car park site.
- 5.34 The site has been identified for a number of years as a potential development opportunity however nothing has progressed. Furthermore, during this time, the site has been assessed as part of numerous planning applications for new retail development, each of which has dismissed the site as being sequentially preferable and on each occasion this has been accepted by the Council. There has been no material changes in circumstances which indicate a different conclusion should be reached in consideration of the current application proposals from, for example, the assessment conducted in respect of the Manor Retail Park.
- 5.35 In summary, locating a Go Outdoors unit on this site would not deliver the desired type of enhancement to the retail offer of the town centre. The site is neither available nor is it suitable for the proposed development. The proposed store would take up the majority of the site and consequently it would not deliver the qualitative and quantitative improvements to attract major high street national fashion retailers and the likes. Furthermore, the site would not address the specific location needs for a replacement and viable alternative use to the consented football pitches at Rustington Golf Centre.

Former Chandlers Showroom, 1-5 Ash Lane, Rustington

- 5.36 This site comprises the former Chandlers car showroom. The site has recently been vacated and the business has located to new purpose built facilities adjacent to Manor Retail Park.
- 5.37 The site is currently being developed in accordance with the planning permission granted on 6th June 2016 (reference R/37/16/PL) for 'refurbishment and change of use from ground floor car showroom (Sui Generis) & first floor flats (C3 dwellings) to A3 (Restaurant and Cafes)'. The proposed use extends to circa 401sqm.
- 5.38 This site is not available and is unsuitable for the proposed development given that it is not of a sufficient size to accommodate the proposed retail warehouse unit.

Vacant Retail Warehouses/Extant Retail Consents

- 5.39 RPS surveys of existing retail warehouses within the District show that there are currently no vacant retail units which might be capable of accommodating the application proposals, for example in preference to developing a new retail unit on the application site.
- 5.40 In relation to extant retail planning consents, the only notable consent is that relating to the consented bulky goods retail development at Oldlands Farm to the north of Bognor Regis close

to existing concentrations of retail warehouses at Shripney Road. The site is an out of centre location and in this respect is no more sequentially preferable to the application site.

- 5.41 A hybrid planning consent (reference BE/61/1) permits the development of up to 4,366sqm bulky goods retail floorspace at the site. Reserved matters were recently approved on 21st March 2017 by permission reference BE/4/17/RES. The permitted development is some 559sqm larger than the application proposals. The scheme has not yet been built out and there is no indication of any intended occupier(s). In this respect it is assumed that the floorspace is speculative in nature.
- 5.42 The permission is subject of a number of restrictions including limitations on the amount of mezzanine retail floorspace, minimum unit sizes and ranges of goods. The submitted drawings show a single retail unit comprising 4,366sqm floorspace comprised of 2,508sqm ground sales area, 1,258sqm mezzanine floorspace and 600sqm garden centre. The permission does allow permit its sub-division. Condition 47 limits the use of the floorspace to the following goods ranges: DIY, furniture, electrical, carpets and floor coverings, automotive goods and bicycles, leisure goods, camping goods, pets and pet supplies, office furniture and supplies and arts and craft materials and supplies. The consented ranges of goods would appear to permit occupation by Go Outdoors.
- 5.43 The site is an out of centre location on the edge of the built up area of Bognor Regis. In this respect the site is no better located than the application site in terms of its relationship with town centres. This site is not sequentially preferable to the application site. Indeed, this site is remote from the area of search identified by Go Outdoors for a new store to serve Littlehampton where there is the benefit of grouped provision with existing and committed leisure facilities. Furthermore, the site would not address the specific need in relation to the viability of the consented leisure scheme at Rustington Golf Centre.

Summary

- 5.44 As the above assessment demonstrates, there are no sequential preferable sites upon which to accommodate the application proposals within or adjacent to Littlehampton or Rustington town centres. Furthermore, there are no vacant retail warehouse units which might accommodate the proposals. The extant planning permission for bulky goods retail floorspace at Oldlands Farm is not available to the applicant and it is unclear what format this will take. Oldlands Farm is no more sequentially preferable to the application site in terms of its proximity and linkages to town centres.
- 5.45 The application proposals have a natural synergy with the existing and committed leisure development at Rustington Golf Centre. The application proposals are considered to be fully compliant with policy DEV27 of the adopted Local Plan and paragraph 26 of the NPPF.

6 RETAIL IMPACT

- 6.1 As previously identified, the NPPF requires out of centre retail proposals such as these (which do not benefit from a specific allocation in an up to date Local Plan and that exceed 2,500sqm floorspace) to be tested in terms of their potential impact upon town centres to determine whether there would be any significant adverse effects.
- 6.2 For the reasons already advanced, the application proposals would compete on a like for like basis with other out of centre retail facilities selling comparable ranges of goods rather than competing strongly with town centre shops. There are few shops within either Rustington or Littlehampton which sell ranges of goods comparable to Go Outdoors or indeed bulky goods. Where these do arise, such goods tend to be sold as part of a specialised retail offer or part of a broader range and mix of goods (i.e. mixed goods/variety retailers).
- 6.3 There are no directly comparable out of centre leisure goods retailers within the Littlehampton/Rustington/Bognor Regis areas, consequently locally generated retail expenditure on bulky leisure goods is likely to be leaking from the District to more distant locations. In this respect the application proposals comprise a form of sustainable economic development which will directly assist in the delivery of a viable leisure scheme at Rustington Golf Centre and simultaneously help to establish more sustainable shopping patterns for leisure goods without significant adverse harm to local town centres.
- 6.4 The nearest existing Go Outdoors store is located at Southampton. It is reasonable to assume that the new store will claw back some retail expenditure which may currently be spent in the Southampton store by Arun residents.
- 6.5 The analysis contained within the previous sections of this report in relation to the health of town centres, the range of existing retail facilities including those located out of centre, the number of vacant units and the types of shops selling comparable goods ranges to Go Outdoors inform the assessment of impact undertaken below.
- 6.6 In particular, the health check analysis of the town centres demonstrate that both Littlehampton and Rustington perform a role and function consistent with their position within the District's retail hierarchy.
- 6.7 In relation to Littlehampton, the departure of Waitrose and Morrison's M Local stores appear to have had little effect upon the vitality and viability of the town centre. A number of retail units previously identified as vacant have been successfully re-let. Whilst new units have become vacant these are not indicative of any trend. Indeed, it is important that a stock of units is maintained in order to attract new retailers and service providers to the town. Littlehampton has developed a significant food and beverage offer which is popular with tourists visiting the area and extends activity within the centre throughout the day.
- 6.8 Littlehampton has a pleasant shopping environment with a large part of the High Street pedestrianised which helps promote a cafe culture free from traffic. The town centre has a good mix of convenience and comparison goods and service uses operated by national and

independent retailers and service providers. There are just three shops specialising in outdoor leisure goods (fishing, outdoor clothing and camping, cycles).

6.9 In summary Littlehampton is considered to be a healthy centre with good indicators of vitality and viability present.

6.10 Similarly, Rustington has benefitted from the relocation of Waitrose to the former Coop store. The centre is attractive and well maintained and has a good mix of shops and local services uses. There is a good supply of convenient free car parking. The centre is very popular with local residents. There is a good mix of national and independent retailers, including a significant number of specialist home decor shops. The centre has very few vacancies providing a strong indication of its retail offer. Rustington is a strong centre with very good signs of vitality and viability.

6.11 The NPPF requires the application proposals to be tested in terms of:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; 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 five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

6.12 Taking each of these in turn:

The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

6.13 The previous sections of this report identified a limited number of opportunities to enhance the retail offer of Littlehampton and Rustington town centres. In particular the Littlehampton Vision Masterplan identified two sites within the town centre, namely the former market on Surrey Street and the St. Martins Car Park for redevelopment.

6.14 The market has already been redeveloped predominately for residential use albeit with a limited amount of ground floor commercial floorspace.

6.15 The St. Martins Car Park has been identified for development for a number of years and indeed is subject to the sequential site assessment undertaken in the previous section of this report. The application proposals are qualitatively and quantitatively different to the vision for the car park and therefore would in no way prejudice the car parking coming forward for development in the future. Much will depend on securing sufficient interest from retailers along with a requirement to retain public car parking on the site as part of any scheme of redevelopment.

6.16 Similarly, the application proposals will not harm the prospects of the former Waitrose unit being re-occupied and/or redeveloped. As evidenced in the previous sections of this report, there are considerable uncertainties regarding this unit.

- 6.17 In Rustington the only planned commitment relates to the former Chandlers car showroom. This is currently undergoing refurbishment for a mixed use scheme. Again the site is qualitatively and quantitatively distinct from the application proposals.
- 6.18 RPS is unaware of any other in centre planned or committed development.
- 6.19 The nature of the application proposals mean that they are unlikely to compete with any demand expressed by retailers to locate within town centres and consequently the application proposals would not prejudice future town centre developments coming forward.

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 five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

- 6.20 In common with other recent retail planning decisions taken by the Council, the impact assessment has been conducted having regard to the retail evidence base prepared in support of the Council's Local Plan. RPS has also had full regard to the retail assessments submitted in support of individual retail planning applications including those for the Manor Retail Park, Rustington. This scheme is the most relevant to the current application proposals and therefore in order to assist the Council's understanding of potential cumulative impacts, RPS has adopted a comparable assessment albeit growing the design year for the assessment of the application proposals from 2018 (as modelled for the Manor Retail Park) to 2021 for Go Outdoors.

Study Area

- 6.21 The application proposals will have a catchment area typically extending to circa 20 minute drive time. This has regard to the proximity of the nearest existing Go Outdoors store at Southampton.
- 6.22 For the purpose of assessing the trade draw and impact of the application proposals, the study area for the Council's Retail Study has been utilised. The study area is divided into 15 survey zones. The survey zones that are most comparable to the 20minute drive time include zones 7, 9, 10, 11, 12, 13, 14 and 15. Indeed, this is comparable to the core catchment area identified in respect of the Manor Retail Park (planning decision reference: A/125/13). Even so, given the lack of direct comparables, the proposed store is expected to draw trade from an extensive area beyond the District.

Study Period

- 6.23 The study period for the assessment of the application proposals has a start year of 2017 and a 'design' year of 2021 i.e. a four year period to enable planning permission to be granted, the construction of the scheme and a period for the new store to adopt a regular trading pattern. This is considered to allow for a robust assessment of potential impacts.

Turnover of Proposed Floorspace

- 6.24 As previously discussed the proposed store is expected to have a turnover of £8.99M (by 2021), based upon the assumption that 80% of the proposed floorspace will comprise the net sales area

of the store (3,046sqm net). This assumes an average sales density of £2,500 per sqm (2013) grown to £2,952 per sqm by 2021 which is comparable to that achieved by bulky goods retailers and is consistent with the sales density adopted by the Council's retail study and that adopted by others in respect of comparable retail proposals (e.g. bulky goods component of the Manor Retail Park).

Growth in Retail Expenditure

- 6.25 The 2016 Update to the Council's Retail Study indicates significant expenditure growth from the original 2013 Retail Study. The latter study reported in 2011 prices whereas the latest 2016 update reports in 2014 prices. Even so, the price indices show that there is only 0.2% difference effectively meaning the figures for comparison goods set out in both studies are directly comparable.
- 6.26 The table below shows the expected growth in comparison goods expenditure between the 2013 and 2016 Retail Study for the study area (zones 1 – 15) for the study period (2017-2021).

Table 1: Growth in Comparison Goods Expenditure for the Study Area

Retail Study	2017		2021	
	Total	Total Arun	Total	Arun Total
2013	£695.57M	£491.93M	£791.15M	£560.42M
2016	£868.22M	£621.70M	£1010.02M	£723.38M
Difference	+£172.65M	+£129.77M	+£218.87M	+£162.96M

Note: Total Arun excludes zone 11 Worthing Source: Arun Retail Study 2013 and 2016 Update

- 6.27 In 2017 alone, the 2013 Retail Study underestimates the available comparison goods expenditure generated by Arun residents by £130M. This compares to the estimate of the turnover of comparison goods retail commitments of circa £47M (Appendix 3, 2016 Retail Study Update). Whilst some of this additional turnover will have been readily absorbed by existing retail facilities both within and outside the study area, it would be reasonable to expect that some of that expenditure remains capable of supporting new retail floorspace.
- 6.28 Setting this aside, as can be seen there is predicted to be an increase in comparison goods retail expenditure over the period 2017-2021 of £141.80M based upon the 2016 Retail Study estimates (compared to the turnover of commitments which are estimated at just £47M). This is very significant indeed. In contrast the application proposals (£8.99M) comprise just 6% of the growth in comparison goods expenditure over the period 2017-2021.
- 6.29 Consistent with the approach taken by the retail assessment prepared by DWD in support of the proposals at the Manor Retail Park, RPS has conservatively adopted the 2013 Retail Study survey derived turnovers for retail facilities. This means that any impacts arising from the application proposals will be over stated as the additional growth in expenditure (as shown by the 2016 Update Retail Study) in reality will have benefitted town centres (and other retail facilities alike) even after taking into account the effect of retail commitments (circa £47M). Accordingly the impact assessment is considered to be robust.
- 6.30 Our assessment assumes trade will be diverted from existing and committed retail facilities however in reality the store will benefit from a general growth in available comparison goods expenditure over time. Again this means impacts are overstated.

Turnover of Existing Retail Facilities

- 6.31 Table 16 of the 2016 Update Retail Study Appendix 2 provides details of the survey derived turnover of existing comparison goods retail facilities within and beyond the study area (2014). The turnover of facilities beyond the study area does not reflect the total turnover of comparison facilities. Similarly, no account is taken of significant inflows of expenditure or indeed tourist expenditure (it is normal to exclude tourist expenditure). The turnovers are based upon the 2012 household survey which means they exclude retail commitments which have since been built out (e.g. Manor Retail Park) and the effect of any significant vacancies which may have arisen in the interim period and which have not been successfully reoccupied (e.g. Waitrose Littlehampton).

Effect of Retail Commitments

- 6.32 The primary retail commitment which needs to be considered relates to the Manor Retail Park, Rustington. The Retail Park has commenced trading and is fully occupied by Next, Aldi and Tapi carpets.
- 6.33 The Planning and Retail Assessment Addendum (February 2015) prepared by Dalton Warner Davis (DWD) in respect of the Manor Retail Park (planning permission A/19/15) provides an assessment of the effect of retail commitments together with the Manor Retail Park (including additional mezzanine floorspace a widening of the permitted ranges of goods to allow Next to trade from one of the units). This assessment provides a useful starting point for the consideration of the potential trading effects of the application proposals.
- 6.34 Table 2 below replicates the information provided in Table 14 Appendix A of the DWD Planning and Retail Assessment (for 2018). The table provides information relating to the comparison goods turnover of Littlehampton and Rustington in 2018 together with the level of trade diversion expected to occur from retail commitments and the Manor Retail Park. It is derived from the Arun Retail Study 2013. As can be seen, the effect of retail commitments (including the Manor Retail Park) is to divert £1.95M and £2.14M comparison goods expenditure from Littlehampton and Rustington.

Table 2: Trade Diversion and Impact of Comparison Goods Retail Commitments 2018

Centre	2018 Trade Diversion to comparison goods commitments £M	2018 Comparison Goods Survey Derived Turnover before Commitments £M	2018 Comparison Goods Turnover post commitments £M	2018 Cumulative Impact of commitments % (Comparison goods turnover only)
Littlehampton TC	£1.95M	£25.62M	£23.67M	7.6%
Rustington	£2.14M	£22.96M	£20.82M	9.3%

- 6.35 Similarly, Table 3 below summarises the position in relation to convenience goods with the effect of commitments plus the Manor Retail Park being to divert £1.5M and £1.34M from Littlehampton and Rustington in 2018.

Table 3: Trade Diversion and Impact of Convenience Goods Retail Commitments 2018

Centre	2018 Trade Diversion to convenience goods commitments £M	2018 Convenience Goods Survey Derived Turnover before Commitments £M	2018 Convenience Goods Turnover post commitments £M	2018 Cumulative Impact of commitments % (Convenience goods turnover only)
Littlehampton TC	£1.5M	£22.88M	£21.38M	6.6%
Rustington	£1.34M	£12.86M	£11.52M	10.4%

- 6.36 The combined effect of all retail commitments (convenience and comparison goods) on Littlehampton and Rustington town centres is 7.11% and 9.70% in 2018. All of the commitments have since been implemented.
- 6.37 The latest estimates of expenditure growth from Experian (Retail Planner Briefing Note 14, November 2016) indicate comparison goods expenditure will grow at a rate of between 0.7% and 2.9% pa over the period 2017-2021 meaning that any impacts will be quickly absorbed by the general growth in comparison goods expenditure, some of which will benefit town centres. In contrast, growth in convenience goods expenditure is expected to be negative, potentially meaning that levels of impact will take longer to be absorbed. Even so, both town centres have a strong convenience goods retail offer, a significant proportion of which is comprised of modern stores that should be more than capable of absorbing the levels of impact predicted. Indeed, these levels of trade diversion and impact have previously been accepted by the Council and planning permission has been granted.

Trade Draw of Proposals

- 6.38 Table 4 below shows the predicted trade draw of the proposed Go Outdoors in relation to comparison goods retail facilities having regard to the availability of shops selling comparable ranges of leisure goods.

Table 4: Trade Diversion & Retail Impact of Application Proposals on Comparison Goods

Centre	Trade Draw of Proposals 2021		Turnover 2021 £M	2021 Impact %
	%	£M		
Arundel	0	0	2.54	0
Bognor Regis TC	1	0.09	9.24	1
Bognor Regis RW	10	0.9	4.91	18.3
Littlehampton TC	4	0.36	24.78	1.5
Littlehampton RW	0	0	22.36	0
Rustington	2	0.18	19.91	0.9
Ferring	0	0	7.28	0
Arun Elsewhere	12	1.08	0.58	186.0
Chichester CC	11	0.99	40.43	2.4
Chichester RW	5	0.45	6.66	6.8
Worthing TC	30	2.70	171.03	1.6
Worthing RW	10	0.9	45.52	2
Holmbush/Shoreham	0	0	8.83	0
Brighton	0	0	16.94	0
Portsmouth	0	0	3.42	0
Elsewhere	15	1.35	20.14	6.7
Internet/Mail Order	0	0	98.38	0
Total		8.99		

Source: Table 11b, DWD Retail Assessment. 2018 turnover grown using Experian Retail Planner Briefing Note 14, Table 4B

- 6.44 In order to assess the impact of the proposed retail unit at the design year (2021) and to take account of the trade diversion of retail commitments as modelled by the DWD assessment referred to earlier, RPS has projected forward the turnover of retail facilities according to the latest floorspace projections provided by Experian Retail Planner Briefing Note 14 (Figure 4a and 4b). Convenience goods floorspace is not expected to experience any growth over this period. Comparison goods floorspace is expected to grow by 2.3% pa over the period 2019 to 2021.
- 6.45 Table 4 demonstrates that the trade diversion associated with the Go Outdoors unit on Littlehampton and Rustington in 2021 is equivalent to an impact of 1.5% and 0.9% in terms of comprising goods only. This however excludes the consideration of commitments.
- 6.46 Table 5 below factors in the effect of commitments on the total turnover of Littlehampton and Rustington (convenience and comparison goods) having regard to the levels of trade diversion to the application proposals identified in Table 4 above.

Table 5: Trade Diversion & Retail Impact 2021 (Convenience+Comparison Goods turnover)

Centre	2021 Trade Diversion to application proposals £M	2021 Turnover before diversion to application proposals £M	2021 Turnover post application proposals £M	2021 Impact %
Littlehampton TC	£0.36M	£46.73M	£46.37M	0.77%
Rustington	£0.18M	£33.81M	£33.63M	0.53%

Notes: Turnover prior to diversion includes effect of retail commitments Table 2 & 3 above.

- 6.47 Table 5 models the trading effects of the proposed Go Outdoors store on Littlehampton and Rustington. As can be seen the levels of impact predicted are very low (<0.8%). Having regard to the health of each centre, these levels of impact should give no cause for concern. As previously evidenced, neither centre comprises significant numbers of shops selling goods comparable to those sold by Go Outdoors. It is therefore reasonable to expect levels of trade diversion to be low.
- 6.48 Levels of trade diversion and resulting impact for an alternative bulky goods operator of the unit are likely to increase marginally given the presence of a greater number and variety of stores selling these types of goods within these centres. Even so, under this scenario RPS expect the level of trade diversion from Littlehampton town centre to increase to £0.45M (5%) and for Rustington £0.63M (7%) equivalent to 0.96% and 1.86% impact respectively. Again these levels of impact are not significantly adverse having regard to the retail offer of each centre and their vitality and viability.

Summary

- 6.49 In summary, the levels of trade diversion and impact predicted in the assessment undertaken above demonstrate that the proposed retail development would not have a significant adverse effect upon any town centre. In particular, the lack of direct comparables within Littlehampton and Rustington mean that neither centre would experience significant levels of trade diversion which might be harmful to their overall vitality and viability. Furthermore, given the nature of the application proposals, they will not jeopardise the delivery of committed developments within town centres. For these reasons the application proposals are considered to be acceptable in terms of the retail impact test prescribed by the NPPF and the policies of the Arun Local Plan. The application proposals will not have a significant adverse effect upon town centres. The majority of trade will be diverted from comparable out of centre facilities. Where trade is drawn from town centre shops this will be widely dispersed over a number of centre.

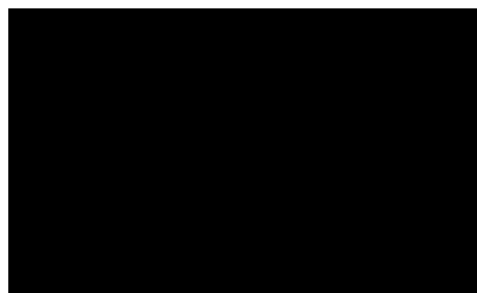
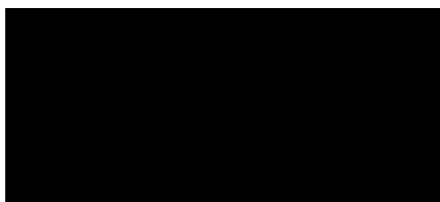
7 CONCLUSIONS

7.1 In summary, the following conclusions can be reached in respect of the assessment of the application proposals against national and local retail planning policy:

- The need for the application proposals arise from a combination of a lack of interest from five aside football operators to occupy the consented leisure scheme at the application site and demand expressed by Go Outdoors for a new store to serve the Littlehampton area. In the absence of a viable alternative use to the consented five aside football pitches and associated building the balance of the leisure scheme will not be realised.
- Importantly, the proposed retailer provides a good synergy with the existing and committed leisure development at Rustington Golf Centre. There are clear benefits for consumers and the retailer in terms of co-locating the retail use with the existing and proposed leisure facilities. The application site comprises an established retail leisure destination.
- Go Outdoors is a specialist outdoor leisure retailer. They sell a comprehensive range of leisure products, the majority of which (80%) are bulky. Go Outdoors require a large retail unit in order to display bulky leisure goods including tents, which enables its customers to try before they buy. There is currently no comparable comprehensive leisure stores located within Arun District. Accordingly the proposals will help to promote more sustainable shopping patterns for leisure goods, removing the need for local residents to travel outside of the District and thereby retain locally generated retail expenditure on leisure goods.
- Littlehampton and Rustington town centres comprise only a limited number of shops which sell goods comparable to those sold by Go Outdoors or indeed bulky comparison goods. Where leisure retail specialists do operate in centre, these retailers tend to provide additional services thereby distinguishing them from the Go Outdoors retail offer. Both centres are healthy.
- The retail impact assessment demonstrates that the application proposals would have a limited effect upon the vitality and viability of town centres. Importantly the application proposals together with other committed (including schemes which have subsequently been built out) retail development would not have a significant adverse effect. Bulky goods, in the main, are already sold outside town centres and centres have long since adapted to any trading effects. As national guidance recognises, like tends to compete with like, meaning that the proposed Go Outdoors (bulky goods) will compete most strongly with other comparable out of centre bulky goods stores rather than town centres. Nevertheless, both town centres have demonstrated their resilience bearing in mind that a number of new bulky and non-bulky retail stores have been consented and commenced trading in recent years within the District.
- In relation to the sequential test, the assessment demonstrates that there are no sequentially preferable sites within or to the edge of town centres that are available and suitable to accommodate the application proposals. Indeed, in this case there are location specific needs that cannot be met by locating a store elsewhere.

- 7.2 In conclusion, for the above reasons, there should be no reason to resist the grant of planning permission for the proposed retail unit having regard to retail planning policy considerations.

APPENDIX 1 - EXPRESSIONS OF INTEREST FROM FIVE ASIDE FOOTBALL OPERATORS



28/03/17

Dear Colin

Five-a-side football site, Rustington

Thank you for bringing this site to our attention as a potential 5 aside football venue for Goals

I can confirm that we reviewed the site and concluded that, due to the existing 5-a-side provision in the area, the site is not of interest to Goals Soccer Centres at this time

Yours sincerely



Morris Payton
Property & Development Director

From: Colin White [REDACTED]
Sent: 06 December 2016 15:16
To: [REDACTED]
Subject: Rustington

Colin,

This was the reply from Playfootball. -

Sorry the site doesn't work for us. To the west 10 mins away you have the Ford indoor football centre, and to the east Worthing has a number of brand new very good 3G facilities including a huge football complex at the Leisure Centre, and a very nice pitch at the Football Club.

Sorry.

Regards,

Colin J White - Director
[REDACTED]



CJ White Associates Ltd
Advisers to the leisure industry



From: Rob Edwards [REDACTED]
Sent: 29 November 2016 10:44
To: [REDACTED]
Subject: RE: Powerleague

Hi Colin,

Thanks for sending this through – I've now had the opportunity to review.

This location isn't currently a priority area for Powerleague, where the model is full time management of artificial grass sports pitches.

However, our sister company Powerplay would be interested in hiring a couple of hours per week from the eventual pitch operator and running small sided football leagues. Would your client be interested in this model?

Thanks,
Rob



From: Colin Crosthwaite [REDACTED]
Sent: 25 November 2016 10:02
To: Rob Edwards
Subject: Powerleague

Hi Rob

Yes, good to make contact yesterday.

I attach details of Rustington Leisure, near Littlehampton, West Sussex which has consent for a 9 pitch scheme with club building.

You will see that it is prominent and accessible destination, and looks a cracking opportunity for Powerleague.

I look forward to hearing from you.

Regards

Colin

Colin Crosthwaite FRICS



