

**LAND AT RUSTINGTON GOLF CENTRE, GOLFERS LANE, ANGMERING
PLANNING APPLICATION REFERENCE NO. A/84/17/PL**

**RPS RESPONSE TO DPDS REPORT TO ARUN DISTRICT COUNCIL
(JANUARY 2018, REF C10291)**

30th JANUARY 2018

Introduction

- 1 This note responds to the report prepared by DPDS for Arun District Council with respect to retail matters in connection with the determination of this planning application.
- 2 The DPDS report is dated January 2018 and a copy was provided to RPS on 19th January 2018.
- 3 The DPDS report focuses upon the two national retail policy tests namely, the sequential and impact tests, that are applicable to the consideration of the application proposals.
- 4 DPDS state that in assessing the application proposals they have given consideration to the following documents submitted by the Applicant:
 - RPS Retail Assessment (April 2017)
 - Design & Access Statement
 - Site and Location Plans
 - RPS response to presentations made by the Parish Councils to the application (2nd August 2017)
 - RPS Summary of Key Issues (12th December 2017)

Pre-Application Discussions

- 5 The DPDS report significantly omits any acknowledgement to the pre-application discussions and agreement reached between the Applicant and the Council's planning officer (David Innes) regarding the scope of the submitted Retail Assessment.
- 6 RPS together with the Applicant's architect, Brian Heap, met with David Innes on 27th February 2017 to discuss a proposed amendment to the consented leisure scheme of development for the site involving the replacement of the five-a-side football pitches with a new retail unit for occupation by Go Outdoors.
- 7 At the meeting the following matters were discussed and agreed in relation to retail planning policy tests:
 - The Retail Assessment should have regard to the Council's Retail Study Update (2016)
 - The core catchment area of the store should be focused upon the same survey areas assessed by the Store Properties planning applications for the Manor Retail Park i.e. excluding

Worthing and Bognor Regis albeit accepting that some customers will be attracted to the store from a wider area reflecting the absence of comparable competing facilities.

- Surveys of Littlehampton and Rustington town centres to be undertaken to ascertain their vitality and viability and inform the impact assessment.
- Survey of shops selling comparable ranges of goods to Go Outdoors and bulky goods (in centre and out of centre) within the core catchment area.
- Provide details of the proposed Go Outdoors requirement, retail format etc
- Provide a cumulative impact assessment, i.e. proposed retail unit together with other recently consented retail schemes e.g. Manor Retail Park
- Impact assessment to be primarily based upon Go Outdoors as the intended operator, although we should include standard range of bulky goods (in this respect the proposed description for the development should probably be for Class A1 non-food bulky goods).
- The sequential assessment should consider sites and premises within Littlehampton and Rustington town centres, including consideration of the former Waitrose store and other sites identified by field surveys
- Review vacant and committed out of town centre retail premises to ascertain the scope to accommodate the Go Outdoors requirement elsewhere within the core catchment area.

- 8 On the 6th March 2017 RPS provided the officer with a note recording our discussions for the purposes of agreeing the scope and methodology for the Retail Assessment (Appendix 1). David Innes agreed the scope of the retail assessment by email dated 28th March 2017 (Appendix 2).
- 9 The Retail Assessment (April 2017) was subsequently prepared upon this agreed basis. Fundamentally, it was agreed that the Retail Assessment should focus, consistent with the Council's assessment of comparable recent retail planning applications (e.g. Manor Retail Park), upon Rustington and Littlehampton town centres in terms of the search for sequential sites and the assessment of impact.
- 10 A number of the comments made by DPDS relate to sites and centres located outside the agreed core catchment area.
- 11 We provide our comments upon sequential and impact matters below as they relate to a) Go Outdoors and b) a bulky goods operator. The latter provides a fall back position in the event that Go Outdoors ceases to trade.
- 12 It is of course open to the Council to impose conditions on any planning permission restricting the use of the proposed retail floorspace, for example by restricting the ranges of goods sold and to prevent the sub-division of the unit, in circumstances where there are any concerns relating to potential impacts upon town centres.
- 13 Nationally bulky goods tend to be predominately sold from out of centre locations (albeit we accept that there are a range of in-centre specialists operating in this sector but generally on a smaller scale). Littlehampton and Rustington are no exception to this general rule as evidenced by our surveys of each centre (Section 4, RPS Retail Assessment).



- 14 As the NPPG advises, impacts tend to occur on a like-for-like basis, meaning that any impacts from the sale of bulky goods from the application site would primarily compete with similar out of centre retail warehouses of which there are a significant number and variety within the locality.
- 15 In contrast there are comparatively few directly comparable retailers to Go Outdoors and consequently the store is likely to draw trade from a much wider area meaning that impacts would be limited and widely dispersed. There will be some cannibalisation with existing Go Outdoor stores.
- 16 There is no evidence to suggest that either Rustington or Littlehampton town centres would suffer any significant adverse effects as a consequence of the application proposals. As the RPS surveys demonstrate, these centres do not rely to any significant extent upon the sale of such goods for their vitality and viability.
- 17 There have been no objections to the application made by town centre retailers or landowners in contrast to other current retail planning applications.
- 18 The application was supported by information relating to the lack of interest from five-a-side football operators. The alternative use of the five-a-side football pitches for a Go Outdoors would have a good synergy with the existing and proposed mix of leisure uses. The proposal reflects a direct interest expressed by Go Outdoors for a new store in this location of the size proposed.

Go Outdoors Assessment

- 19 DPDS express a number of concerns with the assessment undertaken in relation to the sequential and impact testing. Those concerns however stem almost exclusively from the proposed sale of ranges of bulky goods (e.g. DIY, floor coverings, electrical, furniture etc) as opposed to the occupation of the retail unit by Go Outdoors as proposed.
- 20 Setting aside, for the timing being, the concerns about bulky goods and instead focusing upon Go Outdoors, it is clear from DPDS assessment of sequential sites that none of the three town centre sites identified by RPS are suitable.
 - **Former Car Showroom, Ash Lane, Rustington:** It is clear that the site could not accommodate a retail unit of anything like the scale of the Golf Centre application and it can be ruled out (paragraph 3.10)
 - **St Martins Car Park, Littlehampton:** As there is no immediate prospect of the site coming forward for development and overall, we consider that it would be difficult to persuade an Inspector that the site represented a realistic alternative to the proposed development within a reasonable period of time (paragraph 3.13).

RPS consider that it is very significant to note that the Council's emerging Local Plan (which has reached an advanced stage of formulation) does not promote the redevelopment of the site for retail purposes or any other alternative use. This indicates that the site provides valuable car parking facilities of benefit to the vitality and viability of the town centre and therefore the preference would be to retain the site as a car park.



A similar conclusion was reached by DPDS in its assessment of planning application reference A/11/17/OUT for a M&S Foodhall at land south of New Road and east of Brook Lane, Angmering.

- **Former Waitrose, Littlehampton:** DPDS's comments set out at paragraphs 3.14 and 3.5 are extremely brief in dismissing the arguments put forward by RPS why this site is not sequentially preferable. Nevertheless, they imply that the failure of the proposals to satisfy the sequential test arises from the inclusion of a range of bulky goods as opposed to a Go Outdoors store. Against this background, it seems clear that if the proposals were restricted to a Go Outdoors store then the former Waitrose store would not be suitable, it is simply too small even when considering our assessment of sequential sites has been conducted with regard to a flexible minimum floorspace threshold of 3,000sqm. Significantly, unlike other retail applications currently before the Council for determination, the owners of the Waitrose store have not objected to proposed development. We also now understand, through information which has recently come to light, that the owners of the store have previously consulted the Council regarding an alternative residential led mixed use redevelopment of the site including some small unit shops. This provides a clear recognition by the owners that the site is not best suited to large format retail development.

- 21 Go Outdoors trade from a variety of locations and unit sizes. In this particular case their requirement is for a store comprising 3,807sqm floorspace.
- 22 RPS is aware that Go Outdoors trade from premises of typically 3,000sqm floorspace and above. Accordingly, in order to demonstrate flexibility in assessing sequential sites, RPS adopted a threshold of 3,000sqm floorspace i.e. some 807sqm (circa 20%) lower than the optimum requirement as specified in the planning application. This is a very robust and flexible approach consistent with the requirements of the NPPF for testing whether there are any sequentially preferable sites that are genuinely suitable and available in the 'real world'
- 23 In terms of the alternative (bulky goods retailer) scenario, the applicant is not proposing more than one unit of occupation i.e. the proposal is for a single retail unit for occupation by a single retailer. In this respect the proposal is speculative.
- 24 Neither the Council nor DPDS has suggested any other town centre sites as being potentially suitable and available for the proposed development. Indeed, the purpose of our pre-application discussion was to identify which sites needed to be assessed. The submitted RPS Retail Assessment duly conducts that assessment in accordance with the agreement reached. On the basis of Go Outdoors, none of the sites identified within town centres are suitable/available. They are not sequentially preferable to the application site.
- 25 Turning to the matter of other out of centre sites. At the request of the Council's planning officer, we were specifically asked to consider the Oldlands Farm Site.
- 26 Oldlands Farm, like the application site, is an out of centre site. It offers no particular advantage over the application site. Both sites benefit from consented retail/leisure schemes of development, neither of which have been built out. However, unlike the application site, the Oldlands Farm site is

understood not to benefit from any agreements with prospective retail tenants. Consequently, and given prevailing retail market conditions, that scheme has not been built out.

- 27 The Oldlands Farm site offers no advantage in terms of proximity to or linkages with town centres over that of the Application site. Both sites are located in proximity to other existing out of centre retail/leisure facilities to which trips are already occurring. Neither is directly accessible by public transport although local bus services are available nearby. For example, bus route 12 passes the application site and provides a direct link to Rustington and Littlehampton town centres. DPDS reach a similar conclusion (paragraph 3.17) i.e. there is not much to choose between the two sites. In this context, the Oldlands Farm site is not sequentially preferable. Ultimately the market in the real world will decide whether the Oldlands Farm site is built out for retail purposes.
- 28 The application proposals in the first instance promote the occupation of the proposed retail unit by Go Outdoors as part of a wider consented leisure scheme. The consented leisure scheme (with the exception of the five a side football pitches) has a full line up of tenants. The proposed Go Outdoors will complement the consented scheme and the existing range and mix of retail and leisure uses. Locating the retail unit at Oldlands Farm would not assist the development of the consented leisure scheme on the application site which has a substantial package of benefits which were duly recognised by the Council in permitting that scheme.
- 29 The NPPF does not in our view explicitly require an assessment of other out of centre sites where there are no sites within or to the edge of town centres. The clear purpose of the sequential test is to ensure that opportunities for new retail development are focused within town centres first before edge of centre and then out of centre sites.
- 30 The DPDS interpretation of this aspect of the NPPF is extreme and is not consistent with the Council's consideration of similar out of centre retail proposals. If the DPDS interpretation were correct, Applicants would be required to consider every possible out of centre site/premises with no limitations except as provided by the extent of the catchment area. Unlike town centre and edge of centre locations, there is a defined 'area of search' i.e. the primary shopping area and up to 300 metres beyond. The test as suggested by DPDS would be impossible to satisfy in this respect and would be unreasonably onerous.
- 31 The NPPG provides some helpful guidance on the application of the sequential test to the assessment of individual retail proposals. Whilst it states that 'it is for the applicant to demonstrate compliance with the sequential test' Wherever possible, the local planning authority should support the applicant in undertaking the sequential test, including sharing any relevant information. 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. The applicant conducted the sequential test in accordance with the pre-application discussions which agreed which sites and centres should be assessed.



- 32 DPDS also make reference to a lack of assessment of other retail warehouse units in the proposed retail units catchment area. For the reasons set out above, the Applicant undertook detailed pre-application discussions with the Council to agree the scope of the Retail Assessment with the Council. The Retail Assessment includes a comprehensive survey of retail warehouse units located within the District. No vacant units were identified by our survey. There are no other out of centre retail warehouse units to assess.
- 33 The assessment of sequential sites and retail impact have been conducted in a manner consistent with the approach adopted by the Council in relation to its assessment of the proposals for the Manor Retail Park directly opposite the application site to the south of the A259 which is occupied by Next, Tapi Carpets and Aldi (application reference A/19/15). For this reason, the Applicant has only examined sites within and to the edge of Rustington and Littlehampton town centres including vacant premises.
- 34 In summary, RPS consider that there are no sequentially preferable sites within the town centre, edge of centre or out of centre locations to accommodate the application proposals (Go Outdoors) in even a flexible form.
- 35 Similarly, in relation to matters of retail impact, whilst there is an acknowledged requirement for additional clarification, this does not affect the overall conclusion on the potential trading effects of a Go Outdoors store. At paragraph 4.11 DPDS clearly confirm that it is, however, in our view, unlikely that the proposals, trading as a Go Outdoors outlet, would have a significant impact on the town centres. The direct competition in the centres is limited and although there is a degree of more general competition, for instance in clothing and footwear, there is only one outdoor shop in Bognor Regis, one in Littlehampton (specialising in camping stoves, heaters and lighting) and none in Rustington. Furthermore, in our view trade diversion is likely to be more dispersed.
- 36 Furthermore, although drawing a wider general conclusion on the impact test including an assessment of bulky goods, DPDS state that, "we consider that the Applicant has failed to demonstrate that the proposal complied with the impact test, but that is not to say that it could not do so." [RPS emphasis].
- 37 It seems to us, that DPDS's conclusion on bulky goods is incompatible with its conclusion on Go Outdoors. Like the range of goods sold by Go Outdoors, there are few retailers within town centres which sell bulky goods. The sale of such goods is predominately sold from out of centre retail warehouses meaning that in the first instance any trading effects would be felt by comparable out of centre retail facilities as opposed to town centre shops. We provide further commentary on such matters below.
- 38 In summary, it is clear that if the Application proposals solely related to a Go Outdoors store (without a requirement for an additional range of bulky goods), from the assessment provided by DPDS (excluding the consideration of sites and centres outside the agreed scope of the Retail Assessment referred to previously) that the sequential and impact tests have been met, i.e. there are no sequential sites and there would be no significant adverse impact upon town centres (including



centres outside the District). This conclusion weighs heavily in favour of the Go Outdoors store being granted planning consent in retail planning policy terms.

39 From this, we conclude the primary concern in this case relates to the inclusion of a range of bulky goods (other than those sold by Go Outdoors). As we have stated, the range of goods sold could be controlled by condition.

40 As a final comment, if the entire leisure scheme as consented albeit with the five-a-side football pitches substituted by the retail unit were to be submitted as a fresh planning application, it is inconceivable that the Council could point to any sequentially preferable sites. The NPPF requires flexibility but does not require the disaggregation of proposed schemes. In the current case, it seems to us that in addition to assessing sites having regard to flexibility in size, the Applicant is being asked to carve up the proposed floorspace to potentially create a smaller retail unit. Such an approach is unreasonable and goes beyond the requirement of the NPPF or indeed any of the judgements referred to by DPDS.

Bulky Goods Assessment

41 We now turn to the issue of bulky goods.

42 As indicated above, the Council is of course able to impose conditions to limit the range of goods to be sold from the retail unit if it considers this necessary in order to protect town centres.

43 It is clear from the RPS Retail Assessment that the majority of bulky goods are sold from out of centre retail warehouses. This has been the case for a number of years and is common place across the country.

44 The Council has already consented a commercial leisure use of the application site (planning permission reference A/77/16/PL). That scheme was itself subject to an assessment of impact and sequential sites undertaken by RPS.

45 The Council's Economic Development Department (email correspondence dated 2nd June 2016) confirmed that there were no suitable sites to accommodate a range of uses, such as this, within or on the edge of the town centre. We are in agreement with the assessment of vacant sites provided by the applicant. The same overall conclusion was reached by the planning officer in his report to Planning Committee. There have been no material changes in circumstances to suggest that a different outcome would be reached today. Nevertheless, we accept that the current planning application solely relates to a single retail unit albeit in substitution for the consented five a side football pitches.

46 The application red line however encompasses all of the land which is subject of the consented leisure scheme. The current application and consented scheme are compatible in all respects save for the substitution of the five-a-side football pitches for the proposed retail unit.

Sequential Test

- 47 The retail unit is proposed to comprise 3,807sqm GIA floorspace including mezzanine floorspace of 1,393sqm. Although Go Outdoors is the intended operator of the retail unit, there is a fall-back requirement to allow the sale of an additional range of bulky goods. This is by no means unique to the application proposals. Most out of centre retail development is usually permitted to sell a range of bulky comparison goods. This helps to provide certainty for investors, enable funding and permit the future occupation of the floorspace by a range of bulky goods retailer if Go Outdoors were to cease trading.
- 48 As described previously, the sequential assessment has been conducted on the basis of a flexible approach where the search for sites focused upon sites/premises capable of accommodating a minimum 3,000sqm floorspace (compared to the proposed 3,807sqm), i.e. a reduction of circa 20% which demonstrates flexibility consistent with the requirements of the NPPF.
- 49 There is no requirement for the Applicant to disaggregate the proposed floorspace for example by providing it in a number of smaller retail units. The bulky goods, alternative use of the premises, is speculative. The requirement is for a single bulky goods retail unit not units. The market will dictate whether the bulky goods unit is attractive in terms of the requirements being expressed by potential retailers at any given time.
- 50 It is not for the Council to question the amount of floorspace required in circumstances where flexibility has been applied. The needs test is no longer a policy requirement. Significant flexibility has been demonstrated by the Applicant whereby the search for sequential sites has been based upon a robust 20% reduction in floorspace.
- 51 Paragraph 38 of the Dundee Judgment directs how the exercise of applying the sequential approach should be carried out namely, *“The whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is for something less than that sought by the developer... ‘But these [sequential assessment] criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so.’”*
- 52 In order to justify their approach DPDS make reference to the Leamington Spa appeal decision. This is of course not policy or binding case law or indeed a Secretary of State decision, but a comment made by an Inspector in his appeal decision for an extension and sub-division of a Homebase store in Leamington Spa. The Inspector’s views expressed in the appeal decision are not supported by the NPPF, the Dundee Judgment or the Secretary of State in his decision on the wholly speculative Rushden Lakes scheme. There is no requirement in the NPPF for applicants to have to demonstrate more flexibility in terms of format and scale where no named retailers are identified and consequently the Secretary of State did not identify any such requirement in determining the Rushden proposal, which was an entirely speculative proposal without any named operators for the retail elements.



- 53 Contrary to the conclusion made by DPDS, we reasonably consider that there are no sequential preferable sites on the basis of the substantial flexibility applied.
- 54 It is clear, that neither the former car showroom site in Rustington town centre or the St Martins Car Park in Littlehampton are suitable sites for the proposed development (bulky goods). The latter is not likely to come available within a reasonable period of time. This is accepted by DPDS. Furthermore, if this site were a serious contender it would be reasonable to expect the Council to have promoted its development through the Local Plan process given that it is the main landowner. It has not.
- 55 Similarly, for the reasons stated above, Oldlands Farm is not a sequentially preferable site. It offers no advantage over the application site. Both sites are out of centre and have similar linkages to town centres.
- 56 This leaves the former Waitrose store in Littlehampton. This site has been subject to considerable assessment particularly in relation to the proposals promoting a new M&S Foodhall store on land south of New Road and East of Brook Lane (planning applications reference: A/23/15/OUT and A/11/17/OUT). The first of those applications was subject to judicial review in the High Court and is now in the process of being re-determined by the Council together with an amended scheme of development.
- 57 The former Waitrose store is simply too small (at 2,377sqm arranged over two floors) to accommodate the application proposals even when considering the flexibility with which our assessment has been undertaken (i.e. sites and premises capable of accommodating 3,000sqm floorspace).
- 58 In order to occupy the Waitrose store, the application proposals would need to shrink in size by 1,430sqm floorspace - equivalent to a reduction of 37%. Such a reduction is substantial and extreme and goes well beyond the requirement for flexibility in the NPPF. The proposal is for a single retail unit comprising 3,807sqm floorspace. The Applicant is happy to accept a condition preventing sub-division and the formation of additional mezzanine floorspace.
- 59 As indicated, we have become aware that the Waitrose store has been subject of pre-application discussions between the owners and the Council. The pre-application process confirms that an alternative use of the site is being considered in the form of residential led mixed use development including some small retail units (pre-application reference PAA/51/16, dated 6th June 2016). Notwithstanding our comments relating to the size of the existing store, it is clear that the owners are exploring an alternative use of the site. This brings into question the site's ongoing suitability for large scale retail purposes. This is material to the consideration of the sequential test. For these reasons we consider the former Waitrose site is not suitable and is not a sequentially preferable site.
- 60 The Mansfield decision states that sequential assessment should be conducted 'retailer blind' therefore, in reality, there is no difference between a Go Outdoors and bulky goods retailer. DPDS cannot reach a conclusion on the sequential test whereby it appears to accept that the former



Waitrose site is not sequentially preferable for Go Outdoors reaches a conflicting view in relation to a bulky goods retailer. This is illogical.

61 There are no other sites requiring assessment having regard to the agreed core catchment area of the proposed development. Accordingly, we conclude that the sequential test has been fully satisfied.

62 Importantly, locating the retail unit elsewhere, would of course, provide no benefit in terms of helping to realise the consented leisure scheme on the application site and the recognised and accepted benefits that would stem from the overall development of the site.

Impact Test

63 The second test which the application proposals need to satisfy is that of impact.

64 At paragraph 4.17 DPDS state that “the applicant has failed to demonstrate that the proposals comply with the impact test, but that is not to say it could not do so.” [RPS Emphasis]. Accordingly the purpose here is to provide some additional clarification on the impact assessment undertaken as part of the RPS Retail Assessment (April 2017) and to provide additional analysis.

65 The main reason given relates to the range of bulky goods being sought, rather than an objection to Go Outdoors. Indeed, as stated above, DPDS consider that a Go Outdoors store would have no significant adverse effect upon town centres. We therefore focus here upon the potential effects of an alternative bulky goods operator.

66 The survey evidence presented in section 4 of the RPS Retail Assessment demonstrates that there are few shops within local town centres selling ranges of bulky goods. Where such goods are sold these are part of a specialist or diverse retail offer thereby distinguishing such businesses from out of centre retail warehouse facilities operated by the main national retailers. In centre provision tends to be independently owned.

67 Importantly, there is no suggestion that either Rustington or Littlehampton town centres are vulnerable centres which are not performing their designated role and function in accordance with the retail hierarchy. Furthermore, any impacts need to be judged “significant adverse” in order to fail the impact test. Against this background, it is reasonable to assume that a bulky goods store on the application site would have a limited effect in terms of trade diversion from local town centres.

68 Furthermore, there is significant out of centre bulky goods retail provision within the local area including Littlehampton, Rustington, Bognor Regis and further afield in Worthing and Chichester. As the NPPG recognises, such facilities tend to compete on a like for like basis and therefore it would be reasonable to expect any new bulky goods store on the application site to draw trade from these out of centre retail facilities.

- 69 The table below provides additional information in relation to the range of bulky goods retail warehouses located outside Worthing and Chichester (in addition to those identified in section 4 of the RPS Retail Assessment).

Chichester	Worthing
<u>Portfield Retail Park</u> Pets @ Home, Home Sense, John Lewis at Home, Currys PC World, CarpetRight, Bunnings	<u>Downlands Retail Park</u> Currys PC World, Halfords, B&Q
	<u>Red Squire Retail Park</u> Pets @ Home, Wren Kitchens, Argos
	<u>Wickes, Dominion Road</u>

- 70 Although DPDS (paragraph 4.3) agrees that there is significant provision in Bognor Regis and Worthing, they state that the catchment area of the proposed bulky goods store would be concentrated upon Littlehampton and Rustington. This would of course depend upon the type of bulky goods retailer and the extent to which there are already out of centre retail units selling comparable goods in the local area. Nevertheless, the proposals would potentially enable more sustainable shopping patterns for certain types of bulky goods to develop. This would be a positive and beneficial effect.
- 71 The Retail Assessment sets out detailed analysis of the composition and distribution of existing retail facilities within Littlehampton and Rustington town centres as per the agreement reached at pre-application stage.
- 72 Littlehampton and Rustington are the main centres proximate to the application site and which sell a range of convenience and comparison goods. In addition to which there is a significant out of centre retail offer provided in the form of the Rustington and Manor Retail Parks as well as a significant concentration of retail warehouses to the north eastern fringe of Bognor Regis.
- 73 The submitted Retail Assessment demonstrates that the sale of bulky goods (including leisure goods that would be sold from Go Outdoors) is very limited within the town centres. Where such goods are sold these tend to be as part of a wider or specialist retail offer. Furthermore, the quantum of floorspace is at the opposite end of the spectrum to the application proposals. As the NPPG recognises, like tends to compete with like, meaning that large out of centre retail warehouses are likely to compete mostly with comparable out of centre retail facilities rather than town centre shops.



- 74 There is already a range of out of centre retail outlets serving Rustington and Littlehampton including those selling bulky goods. Accordingly, town centre shops selling comparable goods will have already adjusted to any trading effects felt at the time the out of centre facilities commenced trading. Since when there has been further growth in retail expenditure.
- 75 In relation to the turnover of the proposed Go Outdoors, comment is made about the amount of ancillary floorspace (as shown on the submitted plans) being different to that examined by the RPS Retail Assessment.
- 76 The Retail Assessment adopts a ratio of 80% in order to assess the turnover of the sales floorspace of the proposed store. This approach is common with the assessment of out of centre retail warehouses of this nature. The submitted plans do not show the net sales area of the proposed store. The turnover of the store should therefore be assessed on the basis of the submitted Retail Assessment not the application drawings.
- 77 The Retail Assessment calculates the turnover capacity of the proposed retail unit as £8.99M by 2021. This is based upon an average sales density of £2,951 per sqm. The sales density for Go Outdoors has been referenced against information that is available from Mintel's Retail Rankings which provides an indication of the turnover of a typical Go Outdoor store. As DPDS state, this is a reasonable assessment of the sales density for Go Outdoors. Furthermore, this sales density is very comparable to the average sales density which might be achieved by bulky goods operators. It is comparable to that used by the Arun Retail Study and that adopted in respect of assessing other retail proposals (e.g. Manor Retail Park). There will of course be instances where some bulky goods retailers will have a lower sales density (e.g. carpet retailers) and in other instances a higher sales density (e.g. electrical goods retailers). This is reflective of it being an average sales density.
- 78 DPDS raise concerns regarding the sale of electrical goods in particular. There is in reality only one national electrical retailer (Currys PC World) and they already trade from an out of centre store in Littlehampton (and Worthing and Bognor Regis). In the absence of Go Outdoors, the proposed unit is therefore very unlikely to be occupied by Currys PC World. If it were, this is likely to be a store relocation and there would be a direct transfer of trade between the existing store and the application site. Furthermore, the re-occupation of the existing Currys PC World unit by another retailer would be likely to be drawn from other bulky goods retailers. As discussed above, such retailers have a lower sales density, more akin to the average bulky goods sales density adopted by RPS. The net effect of this would be to have no change in terms impact on town centres.
- 79 In the event that the application site were to be occupied by another electrical goods retailer, any impacts would in the main fall directly upon comparable out of centre retailers selling electrical goods i.e. Currys PC World etc, large superstores etc. Accordingly impact upon town centres would be very limited.
- 80 As the RPS assessment of bulky goods within local town centres demonstrates, there are very few shops selling electrical goods. Such retailers already trade alongside out of centre stores and have different retail offers. In these circumstances it is clear that any impact associated with the sale of

electrical goods from the application site would be directed principally to out of centre facilities not town centre stores. Even so, given the limited number of small stores selling electrical goods within local town centres, it is clear that these centres do not rely to any significant extent upon them for their vitality and viability. Such proposals would not therefore have a significant adverse affect upon town centres.

- 81 Furthermore, it is very unlikely that a single electrical retailer would trade the entire retail sales area of the proposed store. In this respect the turnover of the store would reach a peak below that which would be achieved if the average sales density were applied to the entire retail sales area. RPS has therefore tested the potential effects of a high scenario in relation to the sales density assumed at £4,500 per sqm which takes this into account (see Appendix 3).
- 82 In relation to the turnover of town centres, RPS has derived these from the Council's retail studies and by reference to other relevant retail assessments prepared in support of approved schemes of retail development (e.g. Manor Retail Park).
- 83 The turnover of town centres set out in the 2016 Arun Retail Study Update is informed by a household survey undertaken as part of the original 2013 Arun Retail Study (survey date 2012). No update to that survey was conducted in 2016 therefore any changes to the turnover of centres (and other retail facilities) can only arise from changes to available expenditure per head (including adjustments for special forms of trading etc).
- 84 Expenditure on comparison goods has increased considerably within the study area adopted by the Arun Retail Study between the 2013 and 2016 studies (as demonstrated by Table 1, RPS Retail Assessment). Accordingly, it is reasonable to expect town centres to benefit from some of that growth in expenditure. The turnover figures referred to by DPDS (Page 11 of their report) relate to 2012 turnovers. These have not been updated by the 2016 Retail Study Update (Table 16 compared to Table 18 of the 2013 Retail Study). The 2012 turnover therefore need to be rolled forward to 2021 (the adopted design year for the application proposals). DWD in their assessment of the Manor Retail Park (application ref A/19/15, DWD Planning and Retail Planning Addendum, February 2015) roll forward the turnover of town centres to 2018. RPS has taken these as a base and projected them forward to 2021. That assessment was subject to scrutiny by DPDS.
- 85 In their consideration of application reference A/19/15 (Manor Retail Park), DPDS suggested increased turnovers for Littlehampton and Rustington town centres as follows:

Total Town Centre Turnover £M 2018	DWD Assessment	DPDS Assessment	Difference
Littlehampton	£39.90M	£48.50M	+£8.6M
Rustington	£31.45M	£35.82M	+£4.37M

Source: Table 12, DWD Planning & Retail Addendum, February 2015 (application Ref: A/19/15). Comparison + convenience goods turnovers.



- 86 RPS Tables 2 and 3 (RPS Retail Assessment, April 2017) have been derived from Table 14 of Appendix A of the DWD Planning and Retail Addendum (February 2015). Turnovers of Rustington and Littlehampton town centres (before diversion) were used as follows for 2018.

Centre	Convenience Goods	Comparison Goods	Total
Littlehampton	£22.8M	£25.62M	£48.5M
Rustington	£12.86M	£22.96M	£35.82M

- 87 In order to project these turnovers forward to 2021 (the adopted design year), RPS applied a floorspace productivity efficiency rate (see paragraph 6.44 of the RPS Retail Assessment)(Table 5 refers).
- 88 Table 4 (comparison goods only) however adopts a more conservative turnover for Littlehampton and Rustington town centres as per Table 12 (Appendix A) of the DWD Planning and Retail Addendum (February 2015) (see table below). In reality this means that the impact associated with the assessment of the application proposals is over-stated.
- 89 In order to address the small anomaly in the presentation of Table 4 with tables 2, 3 and 5 relating to the turnover of centres, and to present a robust worst case scenario for testing the impact of the application proposals we have updated our tables and these are presented in Appendix 3. These adopt lower turnovers for Littlehampton and Rustington town centres i.e. lower than those previously prescribed by DPDS (as referred to above).
- 90 The revised tables provide an assessment of the retail unit as proposed to be occupied by Go Outdoors and by a bulky goods retailer. Furthermore, we have tested an average scenario and a high scenario to show the potential difference through occupation by different types of bulky goods retailers.
- 91 RPS has taken into account commitments in the form of the Manor Retail Park, Sainsbury's Rustington, Morrisons (Wick) and Littlehampton Covered Market. These planning permissions were predicted by the respective applicants to draw trade from Rustington and Littlehampton town centres. These effects were modelled by DWD in their retail assessment (February 2015) and our assessment of trading effects is consistent with the DWD assessment. RPS Tables 2 and 3 (RPS Retail Assessment) provide an assessment of trade draw from these retail commitments from both a comparison and convenience goods perspective.
- 92 The cumulative effect of commitments (by combining RPS Tables 2 & 3) is an impact of 7.11% and 9.7% on Littlehampton and Rustington town centres respectively. These levels of impact have been approved by the Council. Furthermore, the commitments have been built out and therefore the growth in comparison goods expenditure generally available will have already compensated for at least part of this predicted level of impact.

- 93 In reality, for the reasons explained, the turnover of town centres is likely to be more (rather than less) given the general growth in comparison goods expenditure since 2012 (as evidenced by the 2013 and 2016 Arun Retail Studies).
- 94 At paragraph 6.37 of the RPS Retail Assessment, we make reference to the growth in comparison goods expenditure. These levels of growth are broadly comparable to the latest growth rates as set out by Experian in their Retail Planner Briefing Note 15 (December 2017) where growth on comparison goods is expected to be between 0.8% and 2.7% over the period 2017 and 2021 (the adopted design year).
- 95 We consider the turnover of town centres is a reasonable assessment of their performance and indeed has previously been accepted by the Council as part of the assessment of the proposals for the Manor Retail Park. Notwithstanding this, revised tables presented at Appendix 3 have been prepared to demonstrate how the proposals impact upon town centres in circumstances where the turnover of centres has been reduced – in reality this means the resulting levels of impact are overstated.
- 96 Table 4 presents our assessment of trade diversion to a new Go Outdoors store on the application site. The trade draw assessment has been undertaken having regard to the Go Outdoors product range and the availability of shops selling comparable goods.
- 97 As the RPS survey of retail facilities demonstrates, there are few stores selling goods comparable to Go Outdoors within local town centres (Rustington and Littlehampton). In terms of other centres, the table below summarises the main provision.

Worthing town centre	Bognor Regis town centre	Chichester town centre
Mountain Warehouse Millets Regatta Outdoors Tresspass	Mountain Warehouse	Blacks Mountain Warehouse Cotswold Outdoors

- 98 In each case, these stores are much smaller than the proposed Go Outdoors and focus upon the sale of clothing and footwear ranges. In contrast, Go Outdoors has a much wider range of goods. In the absence of direct comparables in the local area, it is reasonable for the store to divert trade from a wide range of existing retail facilities over a wide area meaning that any trading effects upon individual centres and facilities will be very limited indeed.
- 99 In addition to the above specialist stores, there are a range of stores selling limited types of goods sold by Go Outdoors both within and outside town centres including, for example, Argos, Halfords and clothing shops including Marks & Spencer, TK Maxx etc.
- 100 Our assessment of centres and facilities has informed our judgement regarding trade diversion. The larger centres have a greater variety and number of shops selling comparable goods ranges of

goods to Go Outdoors. In contrast, smaller centres have comparatively few stores. Accordingly it is entirely reasonable to expect a greater diversion of trade from larger proximate centres.

- 101 Appendix 3 provides a revised and new assessment of impact including cumulative impact arising from a Go Outdoors and a bulky goods retailer. In relation to bulky goods two different sales densities have been adopted.
- 102 In relation to an alternative bulky goods use of the proposed retail unit, it is clear that adopting an ~~average~~ or ~~high~~ scenario sales density would not result in a significant adverse impact upon relevant town centres. At worst, impacts upon Littlehampton and Rustington town centres would be 1.32% and 0.82% respectively. In terms of cumulative impact, at worst this is predicted at 9.97% and 11.9% (this is based upon very conservative turnovers for Littlehampton and Rustington, below those suggested by DPDS in relation to their assessment of the Manor Retial Park). The bulk of this impact is made up of other retail commitments rather than a direct effect arising from the application proposals. Furthermore, it is clear that with the predicted growth in expenditure, over a relatively short period of time such levels of impact would be cancelled out. In relation to Go Outdoors, impacts of 0.87% and 0.55% are predicted to occur on Littlehampton and Rustington town centres assuming lower town centre turnovers. Such levels of impact are not significant.
- 103 Finally, DPDS (paragraph 4.15) make reference to the application proposals potentially deterring investment in the re-occupation of the former Waitrose store. The store has remained vacant for some time and it is clear from documents available on the Council's planning register that pre-application advice on a residential led mixed use scheme with some small retail units was undertaken. DPDS is well versed as is the Council on this store. It has been subject of considerable correspondence between DPDS, DWD (acting on behalf of Store Property investments) and Montague Evans (acting for Marks & Spencer). The existing building is designed and laid out as a foodstore and therefore significant changes would need to be made to ready it for occupation for a non-food retailer or indeed an alternative non-retail use. In any event, for the reasons outlined above, the store is not of a sufficient size to accommodate Go Outdoors. Go Outdoors and other bulky goods Retailers are specialists and their presence outside town centres is well established. In such circumstances, such retailers unlikely to deter in centre investment in relation to the former Waitrose store. Significantly, the owners have not objected to the application proposals, this indicates to us that they do not perceive our clients proposals as a threat to the future re-use or redevelopment of the Waitrose store.
- 104 In summary, we consider the application proposals to be compliant in terms of the impact test. As DPDS acknowledge the proposed Go Outdoors is unlikely to have any significant adverse effects upon town centres. A similar conclusion is capable of being reached in relation to bulky goods.
- 105 Lower town centre turnovers than those agreed between DPDS and DWD have been adopted for the purposes of the revised tables provided at Appendix 3. The application of higher turnovers would of course result in lower levels of impact accordingly.



Conclusions

- 106 The Applicant engaged with the Council at pre-application stage and agreed the basis of the retail assessment i.e. it should be focused on Littlehampton and Rustington consistent with the approach adopted by the Council with respect to its assessment of comparable out of centre retail planning proposals.
- 107 Many of DPDS's comments on the sequential and impact tests relate to sites and centres beyond the agreed scope of the Retail Assessment.
- 108 In relation to the sequential test there is only one site in contention, for the former Waitrose store in Littlehampton town centre. Neither DPDS or the Council has identified any other sites which require assessing within relevant town centres for the purposes of the sequential search for sites.
- 109 Even so, it is clear that the former Waitrose store is not suitable for the proposed retail unit even when substantial flexibility is applied (as in this case) in relation to the size of the store. Furthermore, as DPDS is aware, that site has been subject of discussions relating to an alternative residential led use. This is material to the consideration of the suitability of the site for large scale retail purposes.
- 110 DPDS's conclusion that this site is suitable is based upon an extreme application of flexibility in relation to a bulky goods operator. Such a requirement is unreasonable and inconsistent with policy and case law.
- 111 The application proposals seek permission for a single retail unit of the specified size. It is not appropriate to disaggregate that floorspace into multiple units. The applicant is not required to demonstrate a need for that floorspace. The Council is able to impose a condition preventing the unit's sub-division.
- 112 In terms of impact DPDS acknowledge that it is unlikely that a Go Outdoors store would have a significant adverse effect upon any centre.
- 113 In relation to a bulky goods retailer, such goods are predominately and commonly sold from out of centre locations rather than town centres. Indeed, there are an extensive array of out of centre retail warehouses within the locality. A bulky goods retailer would have a wide draw meaning that impacts would be dispersed and negligible upon town centres. Town centres have in the main already adjusted to the sale of these types of goods from out of centre locations. Any impacts will occur on a like for like basis in the form of competition with comparable out of centre retailers. This is accepted by the NPPG.
- 114 The levels of impact predicted to arise from Go Outdoors/a bulky goods retailer on town centres are not significant even when judged against reduced turnovers for town centres. The majority of the cumulative impact predicted to arise on town centres is as a direct consequence of other consented retail schemes as opposed to the Application proposals. The cumulative impact is made up of just 13% and 7% of the bulky goods retailer (under the high scenario) for the application site with



respect to Littlehampton and Rustington, meaning that 83% and 93% of the cumulative impact is comprised of consented retail commitments.

- 115 Having regard to the above analysis, it is considered that the proposals pass both the sequential and impact tests. Even so, the Council is able to impose conditions to limit the ranges of goods which may be sold, the amount of retail sales floorspace and prevent sub-division to ensure the nature of the floorspace does not change.
- 116 In any event, any conflict in terms of the compliance of the proposals with the sequential and impact tests need to be considered in the planning balance with all other material considerations. In this case, it is significant that the proposals will assist in the realisation of the wider consented leisure scheme of development which has previously been acknowledged by the Council as providing a range of benefits, including a significant number of local employment opportunities and enhances tourist and leisure facilities.



Appendix 1:

RUSTINGTON GOLF CENTRE, LITTLEHAMPTON **PROPOSED NON-FOOD RETAIL UNIT (GO OUTDOORS)**

RETAIL ASSESSMENT: SCOPING NOTE **6th March 2017**

1 Introduction

The purpose of this note is to agree the scope of the proposed Retail Assessment that is required to support a future planning application for a new Go Outdoors retail store in place of the consented football pitches at Rustington Golf Centre.

The Retail Assessment will be organised broadly as follows:

- Introduction – background to the proposals.
- Proposed development – information on the proposed operator, floorspace and range of goods to be sold, catchment area.
- Retail planning policy and evidence base review.
- Retail provision – town centres and out of centre provision including comparable ranges of goods, competitors, retail commitments.
- Sequential Site Assessment.
- Impact Assessment – quantitative and qualitative review, retail capacity, trade draw.
- Conclusions.

2 The Proposed Retail Development

- Proposed Floorspace

The proposed retail unit will comprise circa 3,343 sqm gross floorspace including 929 sqm mezzanine floorspace. The net sales area of the store will be assumed to comprise 80% of the gross i.e. 2,674 sqm.

- Proposed Operator

The proposed operator is Go Outdoors. The retail offer of Go Outdoors will complement the existing and consented leisure uses at Rustington Golf Centre.

The nearest existing Go Outdoors stores are located at Southampton and Basingstoke, some 73km and 88km away. 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.

Go Outdoors are primarily a bulky goods retailer specialising in the sale of tents, camping, caravanning furniture and trailers and outdoor activity equipment and accessories. As the table overleaf shows approximately 80% of the sales area is devoted to the sale of such goods.



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%

Go Outdoors is different to typical town centre operators such as Millets, Blacks and Trespass where the primary focus is on the sale of outdoor clothing and footwear and smaller camping accessories.

- Turnover

The turnover of the Go Outdoors unit will be derived from published information relating to the trading performance of Go Outdoors with regard to retail studies submitted in relation to similar Go Outdoors units. Regard will also be had to the sales densities adopted by the Council's Retail Study.

3 Assessment Methodology

- Arun Retail Study 2013 and Update 2016.

In order to assess the potential effects of the proposals, RPS CgMs propose to utilise the Council's Retail Study (2013 and 2016 update) which is based upon a household survey covering the District and beyond.

Comparable assumptions will be adopted unless there is a justifiable reason for departing from such assumptions, for example because of specific and relevant advice provided by the Council's retail consultants in terms of their assessment of recent retail proposals within the District or operator specific requirements.

- Core Catchment Area

Consistent with previous applications for non-food retail development within the area (e.g. proposals by Store Property Investments Limited, application ref A/125/13 and subsequent amendment applications), a core catchment area (i.e. the area from which the proposed store



is expected to draw the majority of its trade) will be defined comprising the Council's Retail Study area zones 7, 9, 10, 11, 12, 13, 14 and 15.

- **Retail Commitments**

The retail assessment will take account of retail commitments. In particular RPS CgMs is aware of non-food retail commitments at Manor Retail Park and the comparison goods element of planned food stores, as described within the Council's Retail Study Update 2016. RPS CgMs will also have regard to any additional supporting information that is to be submitted in relation to the Marks & Spencer Food unit which is currently before the Council for determination.

4 Impact Assessment

- **Qualitative Review of town centres**

RPS CgMs will conduct audits of relevant town centres (Rustington and Littlehampton) within the Core Catchment area to determine their vitality and viability and will make comparisons with similar assessments conducted on behalf of the Council and those submitted in support of other retail proposals. RPS CgMs will also conduct audits of out of centre retail facilities within the core catchment area and beyond. Particular regard will also be had to the number and types of shops selling comparable ranges of goods to those sold by the proposed retailer (Go Outdoors)

- **Quantitative Assessment** - examining the trade draw of the proposal and diversion from existing centres and other retail facilities within the catchment area and beyond. The quantitative assessment will have full regard to the advice contained within National Planning Practice Guidance, in particular recognising the fact that 'it tends to compete with it'. In order to inform the trade draw assessment RPS CgMs will identify stores selling comparable ranges of goods both within and outside the core catchment area.
- An assessment of retail capacity to absorb additional retail floorspace will be undertaken to inform the impact assessment.
- An assessment of the potential cumulative effects of the proposals with other consented retail schemes will also be undertaken, including the Manor Retail Park. Regard will also be had to the possibility of the former Waitrose store in Littlehampton town centre being reoccupied for the sale of comparison goods.

5 Sequential Test

Consistent with the Council's consideration of similar recent proposals for non-food retail schemes, it is proposed to focus the search for sequential sites within and to the edge of town centres located within the core catchment area, namely:

- Rustington
- Littlehampton



RPS CgMs will have full regard to allocated sites and also sites/premises identified through fieldwork.

In particular, the following sites will be considered:

- Former Waitrose store, Littlehampton
- St Martin's Car Park

RPS CgMs will also examine opportunities to accommodate the proposed Go Outdoors store (having regard to national policy advice relating to the need for flexibility) in vacant retail units both within town centres and outside.



Appendix 2: Email Correspondence

Paul Aldridge

From: David Innes [David.Innes@arun.gov.uk]
Sent: 28 March 2017 09:44
To: Paul Aldridge
Subject: Rustington GC

Paul,

Further to your scoping for the retail assessment the only comments I have is that the Arun Retail study update did not repeat the household survey in 2016.

Apologies that it took a bit longer than expected to get back to you.

Regards

David

[David Innes](#) | Planning Consultant , Strategic Development, [Arun District Council](#) | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF DX 57406 Littlehampton
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Appendix 3: Revised Impact Assessment Tables

Table 2: Trade diversion of retail commitments on Comparison Goods 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	£23.15M	£21.2M	8.4%
Rustington	£2.14M	£18.60M	£16.46M	11.5%

Source: Table 14, Appendix A, DWD Planning & Retail Addendum Feb 2015. Based upon lower town centre turnover.

Table 3: Trade Diversion of retail commitments on Convenience Goods 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	£16.75M	£15.25M	8.9%
Rustington	£1.34M	£12.86M	£11.52M	10.4%

Source: Table 14, Appendix A, DWD Planning & Retail Addendum Feb 2015. Note DPDS estimate of town centre turnover is higher.

Table 4: Trade diversion of Go Outdoors on Comparison Goods 2021 (before commitments)

Centre	Trade Draw of Go Outdoors 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
Elsewhere	15	1.35	20.14	6.7
Total		8.99		

Source: Table 11b, Appendix A, DWD Planning and Retail Addendum Feb 2015. 2018 turnover of existing centres grown to 2021 using 2.3% floorspace efficiency factor as advised by Experian. * Turnover before commitments

Table 4a: Trade Diversion of Bulky Goods Operator on Comparison Goods 2021 (High Scenario - £4,500 per sqm)

Centre	Trade Draw of Bulky Goods Retailer 2021		Turnover 2021 £M*	2021 Impact %
	%	£M		
Arundel	0	0	2.54	0
Bognor Regis TC	1	0.14	9.24	1.5
Bognor Regis RW	17	2.33	4.91	47.5
Littlehampton TC	4	0.55	24.78	2.2
Littlehampton RW	20	2.74	22.36	12.3
Rustington	2	0.27	19.91	1.4
Ferring	0	0	7.28	0
Arun Elsewhere	12	1.64	0.58	283.6
Chichester CC	5	0.69	40.43	1.7
Chichester RW	8	1.10	6.66	16.5
Worthing TC	11	1.51	171.03	0.9
Worthing RW	15	2.06	45.52	4.5
Holmbush/Shoreham	0	0	8.83	0
Elsewhere	5	0.69	20.14	3.4
Total		13.71		

Source: Table 11b, Appendix A, DWD Planning and Retail Addendum Feb 2015. 2018 turnover of existing centres grown to 2021 using 2.3% floorspace efficiency factor as advised by Experian. Note: Assumes sales density of £4,500 per sqm for bulky goods operator. * Turnover before commitments.

Table 4b: Trade Diversion of Bulky Goods Operator on Comparison Goods 2021 (Average Scenario - £2,952 per sqm)

Centre	Trade Draw of Bulky Goods Retailer 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	17	1.53	4.91	31.1
Littlehampton TC	4	0.36	24.78	1.5
Littlehampton RW	20	1.80	22.36	8
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	5	0.45	40.43	1.1
Chichester RW	8	0.72	6.66	10.8
Worthing TC	11	0.99	171.03	0.6
Worthing RW	15	1.35	45.52	3
Holmbush/Shoreham	0	0	8.83	0
Elsewhere	5	0.45	20.14	2.2
Total		8.99		

Source: Table 11b, Appendix A, DWD Planning and Retail Addendum Feb 2015. 2018 turnover of existing centres grown to 2021 using 2.3% floorspace efficiency factor as advised by Experian. Note: Assumes sales density of £2,952 per sqm for bulky goods operator. * Turnover before commitments

Table 5: Trade Diversion and Retail Impact 2021 (Go outdoors)

Centre	Trade Diversion to application proposals	Trade Diversion to commitments (convenience + comparison goods)	Turnover before diversion before Go Outdoors and Commitments (convenience + comparison goods)	Impact of Commitments (convenience + comparison goods)	Impact of Go Outdoors	Cumulative impact (Commitments + Go outdoors)
Littlehampton TC	£0.36M	£3.59M	£41.53M	8.6%	0.87%	9.5%
Rustington	£0.18M	£3.63M	£32.77M	11.1%	0.55%	11.6%

2018 turnover of existing centres grown to 2021 using 2.3% floorspace efficiency factor as advised by Experian.

Table 5: Trade Diversion and Retail Impact 2021 (Bulky Goods Retailer – High Scenario Sales density)

Centre	Trade Diversion to Bulky Goods Retailer	Trade Diversion to commitments (convenience + comparison goods)	Turnover before diversion before Bulky Goods Retailer and Commitments (convenience + comparison goods)	Impact of Commitments (convenience + comparison goods)	Impact of Impact Bulky Goods Retailer	Cumulative Impact (Commitments + Bulky Goods Retailer)
Littlehampton TC	£0.55M	£3.59M	£41.53M	8.6%	1.32%	9.97%
Rustington	£0.27M	£3.63M	£32.77M	11.1%	0.82%	11.9%

Assumes High Scenario sales density i see Table 4a.