

ZURICH ASSURANCE LIMITED

BOGNOR REGIS RETAIL PARK
SHRIPNEY ROAD, WEST SUSSEX

PLANNING, ECONOMIC
DEVELOPMENT AND RETAIL
STATEMENT

NOVEMBER 2014

5 Bolton Street
London
W1J 8BA



www.montagu-evans.co.uk

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1.0 INTRODUCTION

1.1 This Planning, Economic Development and Retail Statement has been prepared on behalf of Zurich Assurance Limited to accompany an application for the change of use of Unit 3 to Retail (A1) The development will also include the removal of the existing mezzanine within the unit.

1.2 The description of development is:

“Change of use from D2 to A1 use with removal of existing mezzanine.”

1.3 The existing Unit 3 consists of an area of 949 sqm (GIA) with a mezzanine of 753 sq m (GIA). It is currently occupied by Fitness First and operates under lawful D2 use.

1.4 The change of use will enable Unit 3 to be re-occupied by retailer Home Bargains, maintaining the economic use of the site and enhancing employment levels.

1.5 The Planning, Economic Development and Retail Statement forms part of the information which has been submitted to inform the consideration and determination of this application. It should read in conjunction with the following documents:

- Application Covering Letter;
- Planning Application Form;
- Location Plan;
- Application Drawings;
- Design and Access Statement;
- Biodiversity Checklist;
- Minor Extensions in Flood Zones 2 and 3 form; and
- Transport Assessment.

1.6 The report is structured as follows. Section 2 sets out the site context and planning history of the site. Section 3 sets out the detail of the application proposal and the proposed store format. Section 4 sets out the relevant planning policy framework and in that context, Section 5 sets out the sequential approach and section 6 sets an Economic Impact Assessment as required by Arun District Council's validation requirements and also considers other relevant material considerations. Section 7 sets out the summary and conclusion.

2.0 SITE CONTEXT AND PLANNING HISTORY

- 2.1 A Site Location Plan is included in **Appendix 1**. Unit 3 is situated within the Bognor Regis Retail Park which lies to the north east of Bognor Regis Town Centre.
- 2.2 The Retail Park is bounded by Rowan Way to the north, the A29 (Shripney Road) to the east and a caravan park to the south and the west. Vehicular access to and from the site is located on Rowan Way.
- 2.3 There are currently seven units on the Retail Park. There is an extant planning permission for an additional unit located on the south-eastern corner of the Park for 1,634 square metres of A1 floorspace (permission reference BE/75/12). The current occupiers of the existing units are noted in Table 2.1 below.

UNIT NUMBER	CURRENT OCCUPIER	USE CLASS
1	Matalan	A1
1B	Lidl	A1
2	Bensons Beds & Rosebys	A1
3	Fitness First	D2
4	Dreams	A1
5	Halfords	A1
6	KFC	A3
permission reference BE/75/12	tbc	A1

Table 2.1: Current occupiers of Retail Park

- 2.4 The Retail Park currently has 343 car parking spaces, although the implementation of the extant planning permission would increase this by three resulting in a total provision of 346 spaces.
- 2.5 The Site is located more than 300 metres away from the Primary Shopping Area of Bognor Regis Town Centre and is therefore considered to be in an out-of-town centre location. The policy implications of this are discussed in Section 4.

Relevant Planning History

- 2.6 Planning permission was originally granted for the erection of the retail park under planning permission reference BE/7/87 for:

“Outline application for the erection of two non-food retail warehouse units 6500 sq m with garden centre (929sq m) related site roads, car parking, service yard and landscaping.”

- 2.7 This was subject to a planning condition (no. 4) which limited the sale of goods from the buildings permitted to DIY supplies, electrical goods, gardening requirements,

floor coverings, household hardware, furniture and car accessories. Unit 3 was therefore originally permitted as a retail unit.

- 2.8 Planning permission was subsequently granted in April 1996 under permission reference BE/6/95 for:

'Use of premises for sale of food, drink and other groceries with a shoppers café, without complying with Condition 4 of planning permission BE/7/87.'

- 2.9 Condition 3 of permission reference BE/6/95 states:

'The premises shall be used for the sale of food, drink and other groceries with shoppers café and for no other purpose including any other purpose in class A1 of the schedule to the Town & Country Planning (Use Classes) Order 1987.'

- 2.10 Planning permission was granted on 8 April 1998 under permission reference BE/12/98 for:

'Part-implementation of planning permission BE/6/95 (food) and the required internal and external alterations including construction of a dividing wall, new surface entrance and alterations to front canopy. Provision of additional glazing and revision to car park layout.'

- 2.11 The decision notice identifies the address of development as Unit 1A at the Retail Park (now occupied by Lidl).

- 2.12 Permission reference BE/12/98 is subject to Condition 2 which states:

'The premises shall be used for the sale of food, drink and other groceries with shoppers café and for no other purpose including any other purpose in class A1 of the schedule to the Town & Country Planning (Use Classes) Order 1997.'

- 2.13 Planning permission reference BE/40/99 was granted in September 1999 to allow the sale of clothing and footwear from part of Unit 3.

- 2.14 Planning permission was granted in 2001 under application reference BE/10/01 for the change of use of Unit 3 from A1 to class D2 (assembly and leisure). This permission was implemented and represents the current lawful use of Unit 3.

- 2.15 Planning permission was granted under permission reference BE/59/02 for the installation of mezzanines in Units 2, 3 and 4, and associated boundary treatment, pedestrian footpath and landscaping.

- 2.16 Planning permission was granted in March 2013 for the erection of a new retail unit at the Retail Park with a gross floor area of 1,634 sq m under permission reference BE/75/12.

3.0 APPLICATION PROPOSAL AND STORE FORMAT

- 3.1 The proposed development is for the change of use of Unit 3 to A1 use. There is currently a mezzanine within the unit with an area of 753 sq m (GIA) which will be removed. Thus, the change of use relates only to the ground floor area of 949 sq m GIA.

The Proposed Occupier – Home Bargains

- 3.2 TJ Morris Ltd, trading as Home Bargains has signed an Agreement For Lease to occupy Unit 3.
- 3.3 There are currently over 320 Home Bargains stores in the country, and the Company aims to increase this to over 700 within the next 4-5 years. The company's head office and existing 700,000 square feet distribution centre is located at AXIS Liverpool with more than 1,000 staff on site. Planning permission has recently been secured for a second distribution centre of 700,000 sq ft in Wiltshire.
- 3.4 The floorspace range that Home Bargains require to operate their business model is 929-1,858 sq m gross.
- 3.5 Home Bargains is a large format retailer, with the majority of stores operated from out-of-town centre retail park destinations.
- 3.6 Home Bargains is a value grocery and general merchandise retailer whose slogan is 'Top Brands, Bottom Prices'. For Home Bargains to sell a particular product it has to be between 10 and 30% cheaper than elsewhere. Approximately 70% of the stock is regular lines, while the other 30% changes continually at the discretion of the store manager. This business model allows process to be kept to a minimum.
- 3.7 The following goods are typical of those sold in Home Bargains:
- Furniture and homewares goods;
 - Garden care, garden accessories, barbecues and outdoor heating;
 - DIY and hardware goods;
 - A limited range of electrical goods;
 - Pets products and pet supplies;
 - Baby and child goods, toys;
 - Health and beauty, fragrances;
 - Household and cleaning products;
 - Travel and leisure goods;
 - Seasonal goods (Christmas and Halloween decorations etc) and
 - A limited range of arts and crafts and stationery goods.
- 3.8 The above goods form the majority of the goods sold from a typical Home Bargains store and include bulky and non-bulky goods. This complete product range is

required to attract customers to the store based on a very specific business model. Every product range is therefore essential in providing the appropriate synergy within the retail unit and provides a commercially viable store for the prospective occupier.

- 3.9 Food sales will be limited to no more than 30% of the Gross Internal Floor Area of the unit and are therefore ancillary to the overall retail operation. Food sales are generally limited to non-perishable goods, confectionary and snacks. Drinks are limited to soft drinks and alcoholic drinks (beer, wine and ready mixed drinks). There is an extremely limited range of fresh and perishable goods available (such as chilled sausages, bacon and pasties), typically no more than a single chiller. Choice within a particular range is very limited (for example, there may be just one variety of each product). No frozen food is sold.
- 3.10 The majority of customers shop in bulk using trolleys. This is no different to bulky retail warehouse operators and foodstore operators. Not only to customers buy in bulk, but a large quantum of goods sold by Home Bargains are bulky comparison goods such as DIY and garden products and furniture. The nature of these bulky goods coupled with the fact that customers buy many smaller items in bulk means a larger proportion of Home Bargains Customers use a shopping trolley. Home Bargains therefore has an operational requirement for adjacent at grade car parking, and single level sales area.
- 3.11 Due to the discount nature of the operation, Home Bargains is dependent on the impulse and ancillary sales of non-core products in order to make it viable and support its head office costs.
- 3.12 It would be very difficult for Home Bargains to trade profitably if there were even only a small reduction in turnover. Discount retailers trade on small net margins and rely on the quantity of lower value items to maintain their profitability. This is the case with discount operators whether in the comparison or convenience sectors.

4.0 RELEVANT PLANNING POLICY FRAMEWORK

4.1 This section outlines the relevant national and local level planning policy guidance to the planning application.

4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. The currently adopted statutory Development Plan is:

- Arun District Local Plan (2003) (saved policies).

Arun District Local Plan (2003) (saved policies)

4.3 Paragraph 214 of the National Planning Policy Framework (NPPF) relates to the weight that should be given to policies adopted prior to 2004. The paragraph states that for 12 months from the day of publication of the NPPF, planning authorities may continue to give full weight to relevant policies adopted *from* 2004. In other cases and following this 12 month period, the NPPF instructs that weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF, with the closer the policies in the plan to the policies in the Framework, the greater the weight that should be given.

4.4 Paragraph 214 is relevant in this instance, as the Arun District Local Plan was adopted in 2003. The weight accorded to the policies contained within the Arun District Local Plan should be considered accordingly. The NPPF should carry considerable weight in the determination of this application.

4.5 Paragraph 14 of the NPPF deals with those circumstances where plans are out-of-date (such as at Arun), and confirms the presumption in favour of sustainable development. It states that:

“Where the development plan is absent, silent or relevant policies are out-of-date, [permission should be granted], 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.”*

4.6 Thus, the NPPF makes clear that planning applications should only be refused where any adverse impacts ‘significantly and demonstrably’ (our emphasis) outweigh planning benefits that arise from the proposals.

4.7 In light of the provision set out in the NPPF, limited weight can be attached to the adopted Local Plan. Nevertheless, the relevant policies are listed below and have been considered when appropriate.

4.8 Policy DEV 26 (Criteria for Retail Development) of the Arun District Local Plan saved policies states:

“The District Council will seek to maintain the existing hierarchy of retail centres within Arun. Retail development which accords with this 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.”

4.9 Policy DEV 27 (Criteria for Retail Development) of the Arun District Local Plan saved policies states:

“Proposals outside the Principal Shopping Areas, as defined on the Proposals Map, 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;

(iv) it includes appropriate provision to enable access for people with disabilities.

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 site can be found, firstly within the existing town centre or, secondly, on the edge of the centre.

Applicants will also be required to demonstrate that there is a need for additional facilities.

Where these criteria are satisfied and permission is granted it will be made subject to planning condition or legal agreement, as appropriate, to:

- (a) restrict the range of products sold, and*
- (b) restrict the units' size to a minimum of 1,000 m² (10,764 ft²) with no further sub-division allowed."*

National Planning Policy Framework

- 4.10 The following paragraphs set out the details of the NPPF which was published in March 2012.
- 4.11 Paragraph 17 of the NPPF sets out a number of key principles that should underpin decision-taking. These include the need to proactively support sustainable economic development.
- 4.12 Paragraph 19 of the NPPF makes clear that planning decisions should operate to encourage sustainable growth and that significant weight should be placed on the need to support economic growth through the planning system.
- 4.13 Section 2 of the NPPF deals specifically with the vitality of town centres. Paragraph 23 states that it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability.

Sequential Test

- 4.14 Paragraph 24 of the NPPF states that planning authorities should apply a sequential test to planning applications and main town centre uses¹ that are not in an existing centre and are not in accordance with an up-to-date Local Plan.
- 4.15 Paragraph 24 states that the sequential assessment requires applications for main town centre uses to be located in town centres, then in edge-of-centre locations and only if suitable sites are not available should out-of-centre sites be considered. 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 the town centre.

¹ Main town centre uses are defined as retail development, leisure uses, entertainment facilities, including cinemas, restaurants, drive-thru restaurants, bars, pubs, nightclubs, casinos, health and fitness centres, bowling centres and bingo halls, offices and arts, culture and tourism developments (including theatres, museums, galleries, concert halls, hotels and conference facilities).

- 4.16 Paragraph 24 goes on to state that applicants and the local planning authorities should demonstrate flexibility on issues such as format and scale.

Impact Assessment

- 4.17 Paragraph 26 of the NPPF sets out the circumstances under which an Impact Assessment should be undertaken to accompany proposals for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan.
- 4.18 Paragraph 26 also states that planning authorities should require an Impact Assessment if the development is over a proportionate locally-set floorspace threshold. Paragraph 26 goes on to state that where there is no locally-set threshold (as is the case in Arun), the default threshold is 2,500 sq m. As set out below, the Council's emerging plan contains a proposed threshold for retail impact assessments of 1,000 sq m.
- 4.19 The proposal does not exceed the 2,500 sq m threshold set out in the NPPF nor the 1,000 sq m contained within the Council's emerging policy and thus is not required to undergo an Impact Assessment. That an Impact Assessment is not required has also been confirmed by email from The Council's Strategic Development Manager. Nevertheless, an Impact Assessment has been prepared to accompany this application, for information purposes, to provide the Council with additional comfort that the proposed development will not result in a significant adverse impact on the town centre.
- 4.20 Where an Impact Assessment is required, paragraph 26 states that this should include an assessment of:
- The impact of the proposal on existing, committed and planned public and private investment in the centre or centres in the catchment area of the proposal; and
 - The impact of the proposal on town centre viability and vitality, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made.
- 4.21 Paragraph 27 of the NPPF sets out how the sequential assessment and impact Assessment should be considered. It states that where an application fails to satisfy sequential tests or is likely to have significant adverse impact on one or more of the above factors, it should be refused. This needs to be considered in the context of the advice given at paragraph 14 which requires planning authorities to weigh the balance of any adverse impacts against any benefits that arise from the application proposals, with permission only being refused where there are significant and demonstrable adverse effects.

Arun District Council Draft Local Plan Publication Document (February 2014)

- 4.22 Consultation took place on a Draft Local Plan in 2012. The Council agreed a publication version of the replacement Local Plan in February 2014. It should be noted that version of the plan does not include policies related to proposed housing allocations, spatial portrait, employment and enterprise, transport monitoring and implementation.
- 4.23 The policies contained within the most recent Draft Local Plan Submission Document have not been consulted on at Regulation 19 stage prior to submission to the Secretary of State and have not been examined in public. The Council has advised that a new consultation will take place at the end of October 2014.
- 4.24 Given that there has only been one round of consultation (at Regulation 18 stage), that an additional stage of consultation is planned and that no policies have been examined in public, the weight that can be accorded to the emerging policies is limited as per paragraph 216 of the NPPF. The Regulation 19 consultation may, for example, trigger objections to the policies or the evidence base which would reduce the weight that could be accorded to the emerging policies.
- 4.25 At the time of writing, emerging Policy RET DM1 of the emerging District Local Plan Publication Version states in relation to retail development outside the Town Centres and Local Service Centres:

“Proposals outside the Town Centres and Local Service Centres, as defined on the Policies Map, for non-food retail and food retail, including extensions, will be permitted provided that:

- a. The scheme meets the impact tests of the NPPF;*
- b. The scheme is easily accessible by the highway network and public transport;*
- c. The scheme includes provision for access by cycle and on foot;*
- d. The scheme includes appropriate provision to enable access for people with disabilities.*

Applicants proposing retail development on out of centre sites will demonstrate that no suitable site can be found, firstly within the existing town centre or, secondly, on the edge of the centre.

Where these criteria are satisfied and permission is granted it will be made subject to planning condition or legal agreement, as appropriate, to restrict the range of products sold.”

- 4.26 The supporting text to the policy at 9.2.1 states:

“For the avoidance of doubt, impact assessment for growth of office, leisure and retail development will be required from a threshold of 1,000 sqm for Town Centres”

- 4.27 Notwithstanding the limited weight that can be given to the emerging policy, the proposed development does not exceed the threshold for requiring an Impact Assessment. The emerging Policy indicates that the proposed development should be assessed in accordance with the NPPF.
- 4.28 Emerging Policy OSR DM1 seeks to protect existing indoor sport, arts and cultural facilities subject to certain criteria. However, only limited weight can be afforded to this given that the policy is still to be consulted on and to undergo examination in public.

5.0 SEQUENTIAL APPROACH AND SITE SELECTION

- 5.1 The NPPF advocates that a sequential approach to site selection be adopted. For planning applications creating new units in an out-of-centre location, this involves examining whether there are any more central sites within the area that the development seeks to serve that are suitable, available and viable for the proposed development.
- 5.2 The application site is considered to be located in an out-of-centre location and therefore this assessment considers sites located within town centre and edge-of-centre locations.
- 5.3 The National Planning Policy Guidance provides additional detail in how the sequential assessment should be used in decision making. With regards to flexibility, the NPPG states, '*is there scope of flexibility in the format and/or scale of the proposal?*'(paragraph ID 2b-010-20140306)
- 5.4 Home Bargains have a published requirement for store sizes ranging between 929 sq m and 1,858 sq m. The current unit has a GIA of 949 sq m at Ground floor, and the existing mezzanine will be removed. Therefore the proposed change of use is to accommodate a Home Bargains at the smallest end of the range from which Home Bargains can viably operate. This, and the removal of the mezzanine demonstrates in itself flexibility in the format that Home Bargains wish to operate in Bognor Regis.
- 5.5 Home Bargains also require servicing space to accommodate deliveries by articulated lorries. Adjacent car parking is also required for customers to transport away their purchases. The car parking needs to be free so as to not discourage Home Bargains' customers from lower income groups.
- 5.6 **Appendix 2** contains the zones map from the 2013 Arun District Retail Study. Comparison goods turnover in Bognor Regis is largely drawn from primarily from zones 1-5 with some turnover also drawn from zones 6-8. Only negligible trade is drawn from zones 9-15. The catchment area from which the proposed retail use is considered to serve is therefore formed by zones 1-5. Bognor Regis is at the centre of this catchment area and is the only designated town centre within the identified catchment area. The sequential assessment is therefore concerned with sites within and on the edge of the Bognor Regis.
- 5.7 There are several other important material considerations in the application of the sequential assessment. Most recently, the Council considered an application for additional retail development at Arun Retail Park under application reference BE/37/14/PL which was granted planning permission in July 2013. The application proposals comprised the installation of a mezzanine of 486 sq m with extension of 13 sq m at ground floor, the use of Unit D1 for sales of food, the change of use of Unit D2 from *sui generis* use to Class A1 retail use with a mezzanine of 821 sq m and ground floor extension of 177 sq m for occupation by Next.

- 5.8 The sequential assessment was undertaken on the basis of a site capable of accommodating a unit of 966 sq m GEA with a 486 sq m mezzanine to accommodate Marks and Spencer and a unit of 996 sq m to accommodate Next. Notwithstanding that the current application proposals require the removal of the existing mezzanine, the sequential assessment undertaken as part of application reference BE/37/14/PL was undertaken on the basis of a site area almost identical to that of the ground floor Unit 3 at Bognor Regis Retail Park. It was accepted in that instance that the sequential assessment should only cover Bognor Regis town centre.
- 5.9 As well as vacant units (which are considered below), the sequential assessment that was undertaken as part of application reference BE/37/14/PL considered the following sites:
- The Regis Site;
 - The Hothamton Car site;
 - 70/70a Aldwick Road, Bognor Regis;
 - Retail Premises, Wish Field Drive, Felpham; and
 - Durlston Parade, Durlston Drive, Bognor Regis.
- 5.10 The Council did not identify any further sites that should be assessed during the determination of application reference BE/37/14/PL. The Council's retail consultants considered that the requirements of the sequential assessment had been met and that there were no suitable and available sites that could accommodate the unit sizes proposed as part of that application.
- 5.11 The Council accepted the conclusions of their retail consultants. We do not consider there to be any other change in circumstances that would mean that the Council would come to a different conclusion during the determination of this application.
- 5.12 For the sake of clarity, the following additional information is provided with respect to the Regis Centre and the Hothamton site.
- 5.13 In September 2014 the Council agreed with St Modwen to jointly surrender the Development agreement that had been in place since 2007 with immediate effect. The Council resolved to undertake additional public consultation at the beginning of 2015 on the regeneration of the sites, with the possibility of securing planning permission prior to marketing the sites as a development opportunity.
- 5.14 Notwithstanding that there was no certainty that either of the two sites would provide a unit capable of accommodating the proposed development, the two sites are now categorically not available for development. There is no development agreement in place. The Council has not resolved to prepare its own planning applications. There is no certainty that following the period of public consultation that planning applications will be prepared and submitted. Even if they were, these would be on a purely

speculative basis, with no indication that the sites could be brought forward for development.

- 5.15 In order to take account of any changes in circumstances since planning permission reference BE/37/14/PL was granted in July 2014, Montagu Evans has also undertaken a search of actively marketed units in Bognor Regis via the Focusnet database with a minimum size of 600 sq m, notwithstanding that this is considerably smaller than minimum size unit required by Home Bargains.
- 5.16 In Bognor Regis town centre, or on the edge of the town centres, there are no units available and currently being marketed with a minimum size of 600 sq m.
- 5.17 We conclude that there are no sequentially preferable available or suitable sites that could accommodate the proposed Home Bargains.

6.0 RETAIL AND ECONOMIC IMPACT ASSESSMENT

6.1 This section comprises an Economic Impact Assessment as required by Arun District Council's validation requirements.

6.2 As specified in the previous sections, the NPPF does not require an Impact Assessment to be undertaken for retail proposals of less than 2,500 sq m in area. The emerging policy, notwithstanding the limited weight that can be attached, contains a proposed threshold of 1,000 sq m. The proposed development does not create retail floorspace in excess of either of these thresholds and an Impact Assessment is not therefore required. This has been confirmed by email from the Council's Strategic Development Manager.

6.3 The assessment contained within **Appendix 3** of this report is therefore provided for information purposes to take account of the guidance set out in the NPPF (notwithstanding that an assessment is not required) to give the Council comfort that the change of use will have no significant adverse effect on the vitality and viability of the town centre.

Retail Impact Assessment Summary

6.4 The Retail Impact Assessment at Appendix 3 demonstrates:

- Requirements for retail representation within the town centre is buoyant, with published requirements from 55 retailers;
- There will be a very modest level of turnover (around 0.5% of the turnover of the town centre) diverted from the town centre which would not equate to harm to the viability and vitality of the town centre;
- The level of trade diversion is likely to be an over estimate, as the assessment assumes (unrealistically) no expenditure inflow from tourism;
- Conversely, a much larger sum of turnover (£0.59m) will be clawed back to the catchment area that is currently 'leaking' to other retail destinations such as Chichester; and
- The store will be most likely to compete with other out-of-centre retail destinations.

6.5 It is also material that the development agreement between the Council and St Modwen relating to the redevelopment of the Regis Centre and Hothampton sites has been terminated. The Council is currently considering the feasibility of alternative development on these sites, but has not committed to the submission of any planning applications. The development aspirations for these two sites are now long term and would be unaffected by the application proposals.

Other Material Considerations

- 6.6 The new retail use will attract a retailer (and therefore additional investment) not already present in the Bognor Regis area. The enhancement to consumer choice is recognised in the NPPF as a material consideration.
- 6.7 Emerging Policy OSR DM1 seeks to restrict the loss of indoor sports, arts and cultural facilities. However, given that the policy is still to undergo consultation (which may raise objections in terms of the policy's soundness), this policy carries little weight. Therefore there is no in-principle objection to the loss of the D2 unit. No in-principle objection to the change of use of Unit 3 away from D2 was raised by the Council in pre-application discussions in May 2013.
- 6.8 Fitness First's corporate strategy is to consolidate and refit clubs inside the M25 core area, and investment required to update the Bognor club is not financially justified by the membership levels. The site being on a retail park without other leisure anchors is also seen as a disadvantage to growth.
- 6.9 The unit is not suitable for other uses within Use Class D2 as a cinema or music/concert hall due to its size, configuration location or requirements for substantial adaptations (such as a swimming pool), or lack of demand for such premises by these types of uses.

Employment

- 6.10 The existing D2 use employs approximately 10 people.
- 6.11 The proposed A1 retail use will employ approximately 44 people, an increase in employment of some 34 jobs. This will be at all levels from shop floor staff to management positions. The use of the unit will result in further non-shop staff employment opportunities such as cleaners, security guards, maintenance etc.
- 6.12 Research shows that retail employment tends to be absorbed by residents within a relatively small catchment area suggesting that a large percentage of new jobs will be absorbed by local unemployed residents.
- 6.13 The internal fit out will all generate additional employment opportunities and result in inward investment into Bognor Regis or around £0.5m in terms of the store fit out.
- 6.14 The NPPF indicates that job creation should be accorded significant weight when determining an application. The proposed level of job creation is a very compelling benefit arising from the application proposals.
- 6.15 The proposed change of use will enable the unit to continue in productive use, enhancing local levels of employment.

Other Matters

- 6.16 The Transport Statement submitted with the planning application demonstrates that there will be no adverse effect on the operation of the highway or the Retail Park's car park arising from the change of use (rather, there is likely to be a reduction in traffic movements which could be considered a planning benefit).
- 6.17 The application proposal does not involve any operational development. It is for the occupation of an existing building (that was originally in use for retail purposes) by a non-vulnerable use. The proposals do not therefore raise any issues in terms of flood risk.

Summary of Policy Assessment

- 6.18 The application proposals will result in the following planning benefits:
- A substantial increase in employment levels at a range of levels;
 - An improvement to consumer choice and the range and quality of the retail offer in an accessible location;
 - The clawback of retailer expenditure currently leaking from Bognor Regis (£1.71m) with commensurate sustainability benefits;
 - A reduction in traffic movements at the Retail Park (again with commensurate sustainability benefits);
- 6.19 Trade diversion from the town centre is negligible and not material in planning terms, and are not considered 'significant' in terms of Paragraphs 14 and 26 of the NPPF. Any trade diversion is outweighed by the planning benefits identified above
- 6.20 These conclusions are drawn notwithstanding that a Retail Impact Assessment is not required with this application.
- 6.21 There are no other material considerations which could prevent the Council determining the subject planning application and reaching a positive conclusion.

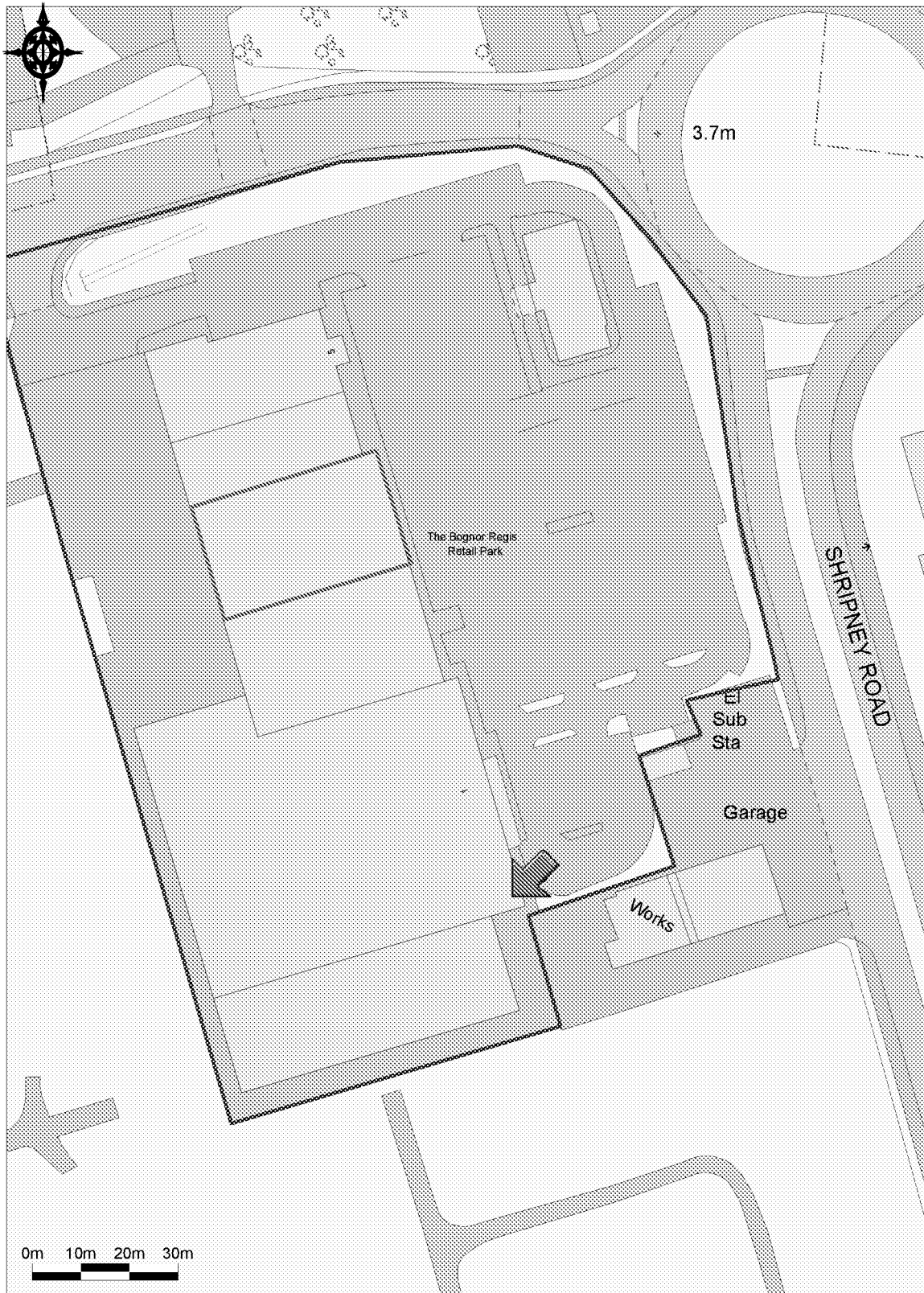
7.0 CONCLUSIONS

- 7.1 This document forms a Planning, Economic Development and Retail Statement to accompany the planning application for the change of use of Unit 3 at the Bognor Regis Retail Park from D2 to A1 use. The development also includes the removal of the existing mezzanine within the unit.
- 7.2 The unit was originally in A1 retail use when the retail park was first constructed. It was first used for D2 use in 2001.
- 7.3 The re-use of the unit for retail purposes will ensure its ongoing economic use and the retention of jobs in the District. The existing occupier employs 10 people and the proposed retail use will employ 44 people.
- 7.4 The proposed retail operator is TJ Morris Ltd trading as Home Bargains. Home Bargains is a value grocery and general merchandise retailer. They sell a range of goods including up to 30% of the gross internal floor area of the unit to be used for food. Food sales are generally limited to non-perishable goods, confectionary and snacks. Drinks are limited to soft drinks and beer, wine and ready mixed drinks. The range of fresh and perishable goods is extremely limited and choice within a particular range is also limited. No frozen food is sold from Home Bargains.
- 7.5 The sequential assessment contained within this report assesses sites within and on the edge of Bognor Regis Town Centre. Home Bargains have demonstrated flexibility in their format by removing existing mezzanine and occupying the smallest unit from which it is possible to operate their business model.
- 7.6 The officer's report on the sequential assessment for planning permission reference BE/37/14/PL (granted July 2013) contained the Council's view that there were no sequentially preferable sites that could accommodate a unit of 966 sq m. This sequential assessment was therefore undertaken on the basis of a unit area almost identical to that of Unit 3 of Bognor Regis Retail Park.
- 7.7 There is no change in circumstances would mean the Council would come to an alternative view regarding the availability of suitable sites closer to the town centre. In fact, the determination of the legal agreement between the Council and St Modwen to develop the Hothampton and Regis Centre sites means that the development of the sites is now considered to be a much longer term position.
- 7.8 In terms of the impact assessment, the planning application proposals fall beneath the NPPF and Arun District's emerging Local Plan threshold for development that requires an impact assessment. An impact assessment is therefore not required with this planning application, and this has been confirmed by email by the Council's Strategic Development Manager.
- 7.9 Notwithstanding that a retail impact assessment is not required, the assessment contained within this report demonstrates that there will be no significant adverse effect on the town centre arising from the planning application proposals.

- 7.10 There are a number of substantial planning benefits in terms of employment, traffic reduction and the claw back of expenditure that is currently leaking from Bognor Regis to other more distant retail destinations.
- 7.11 There are no other material considerations which could prevent the Council determining the planning application and reaching a positive conclusion. Planning Permission should therefore be granted.

Appendix 1

Site Location Plan

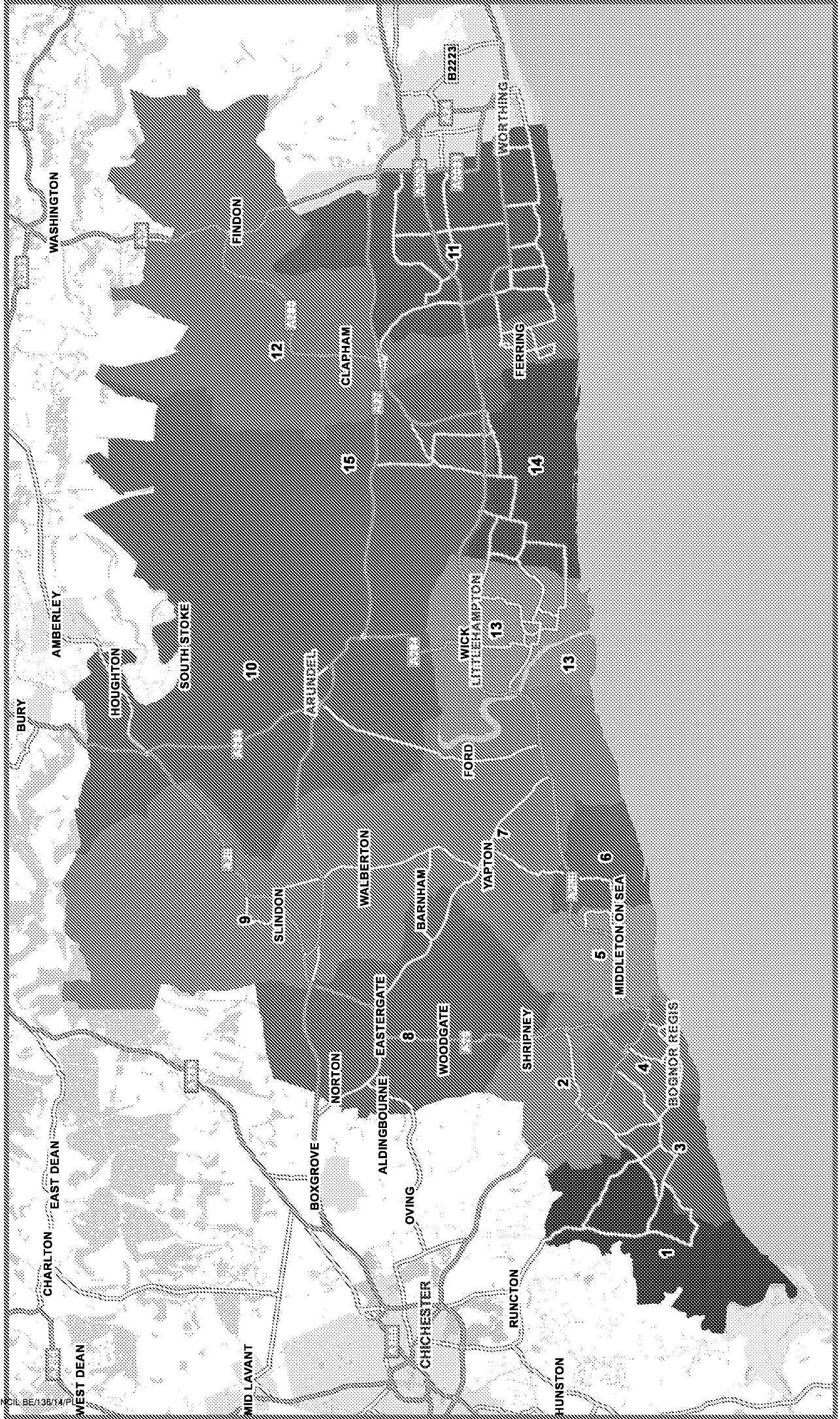


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Appendix 2

2013 Arun Retail Study Household Survey Zones

Arun District Retail Study



Appendix 3

Retail Impact Assessment

- 1.14 The proposed occupier sells a range of comparison goods with only an ancillary range of food goods. This assessment has been undertaken on the basis of comparison goods only, as the impact of the ancillary element of the food sales will not be material in planning terms (also bearing in mind that neither the food nor non-food elements trigger the need for an Impact Assessment in accordance with the NPPF or emerging policy). Further commentary on the potential impact of food sales is set out below.

Turnover of Proposed Development

- 1.15 The ground floor has a gross floor space of 949 sq m. The existing mezzanine will be removed and so this assessment considers the ground floor space only. The net sales for non-food comparison goods space will be approximately 551 sq m, with the balance of the space used for storage, back of house facilities and staff areas. This equates to an estimated turnover of the unit of £1.38m. This assumes a turnover of £2,500 per sq m in 2018. Home Bargains has advised Montagu Evans that they typically turnover at around £2,000-£2,500 per sq m. For the sake of robustness, this assessment uses the higher end of the range.

Trade Draw of Proposed Development

- 1.16 Table 2 shows where the geographical zones that the existing and proposed store would be expected to draw its turnover from (see zones plan at **Appendix 2**). The proposed store can be expected to draw the majority of its trade from those zones closest to the site on the basis that shoppers who live further away will visit closer, more convenient locations. The proposed catchment area of the store is based on the geographical area from which Bognor Regis comparison goods retailers presently draw their trade, as set out in the 2013 Arun Retail Study update. It is clear that Zones 1-5 form the primary catchment area of the proposed bulky goods store, with zones 6-8 forming a 'secondary' catchment area with low levels of trade draw. There is only negligible trade drawn from Zones 9-15.
- 1.17 To use Zone 1 as an example, the trade drawn from the zone is modest: £0.13m.

Market Shares and Trade Diversion

- 1.18 Table 3 shows the comparison goods turnover by zone of retail destinations serving the proposed store's catchment area. These are taken from the 2013 Arun Retail Study. These are translated into the market shares shown in Table 4. It is emphasised at this stage that the total turnovers shown are for expenditure generated by residents of these zones only. The table (and the 2013 Arun Retail Study) makes no allowance at all for the inflow of tourist expenditure. Therefore the total expenditures shown for each centre will very likely underrepresent the actual turnover achieved.
- 1.19 If a particular town or facility accounts for the vast majority of expenditure currently generated in a given zone, it is likely that a similarly high proportion of the proposal's turnover will be diverted from that destination. Conversely, if an existing facility is distant from a particular zone and attracts relatively little expenditure, then the effect of the proposed development on

that facility is likely to be far less. This provides a useful benchmark for assessing the impact of trade diversion.

- 1.20 Referring to Table 4 to illustrate this by way of an example, the majority of Zone 2's comparison goods expenditure is directed to Bognor Regis town centre (33%).
- 1.21 In terms of the trade diversion of the proposed unit, again, because the majority of Zone 2's comparison goods expenditure is directed to Bognor Regis Town Centre town centre (33%), a similar proportion off the turnover of the proposed development could be expected to be diverted from Bognor Regis town centre. Referring to Table 5, it can be seen that the proposed Unit is estimated to divert a total of £0.05m of Zone 2's expenditure from Bognor Regis town centre in 2018.
- 1.22 Also by way of example, across all zones, it can be seen from Table 5 that the proposed unit will result in a total of £0.31m of trade diversion from Bognor Regis in 2018. This is a very modest level of diversion.
- 1.23 It is an accepted principle that 'like competes with like'. Therefore, a retailer (particularly one selling a proportion of bulky goods) located in an out-of-centre location is likely to compete with other out-of-centre locations. Following this principle, the reality is that some proportion of trade diverted to the new store created at Bognor Regis Retail Park will come from other out-of-centre locations rather than the town centre. Table 4 shows this to be a total of £0.14m in 2018. This sum may be higher (and the diversion from the town centre commensurately lower) to reflect the range of bulky goods sold by the proposed occupier.
- 1.24 Furthermore, the proposed new store is likely also to attract an element of trade which is currently leaking from the catchment area (for example 40% of Zone 2's expenditure leaks from the District area to other destinations, particularly Chichester). This can be especially true when a proposed retailer is not already represented, and the proposed store represents a qualitative improvement in retail provision. It is reasonable to assume that the proposed store at Bognor Regis Retail Park (especially as it will accommodate a retailer not already represented in the town) will attract some of the expenditure that is currently outside the town. Table 5 shows that a total of £0.59m in 2018 will be diverted back to the primary catchment area from retail destinations outside the District. This represents an economic benefit, and also a sustainability benefit, as shoppers will not have to travel so far to have their needs met.
- 1.25 It is clear from the table that the majority of trade is diverted from other out-of-town centre locations and outside the catchment area (totalling £0.76 in 2018– this equates to 55% of the turnover of the proposed unit).
- 1.26 Table 4 shows that the level of trade diverted from Littlehampton town centre is anticipated to be £0.03m. This is not material in planning terms.

Impact of Trade Diversion

- 1.27 Table 6 sets out the impact of the comparison goods trade diversion on the District town centres in 2018.
- 1.28 Table 6 shows that in 2018, Bognor Regis town centre's comparison goods floorspace is expected to turnover at £69.19m. This is marginally above the anticipated benchmark level of turnover of £65.42m. The benchmark has been derived from the Arun Retail Study's assumption that the Benchmark in 2012 is equivalent to the town's actual turnover, which we have then grown by 2.1% per annum to take account of increases in sales density (consistent with the rate of growth set out in the 2013 study). This analysis provides the outcome of a 'no-development scenario'.
- 1.29 As a result of trade diversion arising from the proposed scheme, the turnover of Bognor Regis would reduce slightly to £68.88 turnover in 2018, which would still be above the benchmark turnover.
- 1.30 The table then shows the effect of the trade diversion of the following committed comparison goods development:
- Unimplemented permission for retail unit at the Bognor Regis Retail Park (BE/75/12);
 - Unimplemented permission for retail units at Oldlands Farm (BE 61/13);
 - Unimplemented permission for Next to occupy a unit at Arun Retail Park (BE/37/14)
- 1.31 The total trade diversion of the committed developments has been informed by the advice of the Council's retail consultants in the determination of permission reference BE/37/14.
- 1.32 As a baseline, if all of the commitments came forward, then the turnover of Bognor Town centre would continue to turnover at 100% of its benchmark in 2018. The cumulative effect of the application proposals would reduce the turnover of Bognor town centre to £65.36m in 2018 which is still around 100% of the town centre's comparison goods turnover. As already discussed, the level of impact is likely to have been overstated as this assessment excludes any inflow or tourist expenditure. The application proposals would represent a diversion of 0.5% of the town's comparison goods turnover which is not material in planning terms.
- 1.33 The identified level of trade diversion, with or without taking account of cumulative impact, does represent a significant adverse impact in NPPF terms.
- 1.34 The proportion of trade diverted from Littlehampton town centre is even smaller, at 0.1%, which is not material in planning terms.
- 1.35 Tables 1A-6A assess the impact of the scheme in 2021. Table 6A shows that taking account of the cumulative impact with the application proposals, the town centre will continue to turnover at around its benchmark level.

- 1.36 On the basis of the analysis above, we conclude that there is no adverse impact on the District's Town Centres.

Impact of Food Sales

- 1.37 As set out in Section 3, food goods will be sold from up to 30% of the gross internal area of the unit. This equates to no more than 284 sq m net. The potential turnover of this element, in 2018, is estimated to be £0.71 (source: Home Bargains).
- 1.38 The food goods sold represent a limited range. A full trolley bulk shop is not possible at Home Bargains given the limited ranges on offer as explained in Section 3. Given the catchment area of the proposals and the very wide range of other facilities that serve catchment area residents for this type of shopping (see Table 7, Appendix Di, Arun Retail Study 2013), along with the limited range of food goods sold, the trade diversion from any given destination will be very low.
- 1.39 Any of the very many retail destinations identified that serve the catchment area of the proposed Home Bargains *may* be expected to experience some trade diversion. However, due to the very nature of supplementary shops and the large number of facilities at which people undertake this kind of shop, this effect will be very diffuse and very small, such that the effect on any one retailer will be *de minimis*.
- 1.40 The depth and breadth of the range of goods sold is also material. There will be no impact on the Town Centre Iceland, for example, as no frozen goods are sold in Home Bargains. Similarly, one would expect the impact on operators such as the town centre Morrisons to be low, given the range of goods sold by the latter, including fresh bakery goods, a wide range of fruit and vegetables, the wide sale of staple goods and ingredients etc, all of which will have limited or non-existent availability in the proposed Home Bargains. In fact the total overlap of food goods sold by Home Bargains and other town centre shopping destinations is low.
- 1.41 As with the comparison goods assessment, there will also be trade diversion from other out-of-centre locations. The destination with which the proposed Home Bargains is most likely to compete will be the Lidl store on the Bognor Regis Retail Park itself – it will be a simple matter for shoppers to transfer expenditure from one destination to the other once they have arrived at the retail park. This of course is an out-of-town destination and so is not relevant in terms of the impact assessment. There will also be diversion from the out-of-centre Sainsbury's and Tesco, which are similarly not relevant in terms of the Impact Assessment. There will also be trade diversion occurring from destinations outside the District.
- 1.42 Morrisons is identified in the Council's retail consultant's response to application reference BE/37/14 to be the main concern of an Impact Assessment (paragraph 4.20) in terms of food sales. The Council's retail consultant adopts an approach to trade diversion according to the market share of the store in the proposed catchment area. Following the same logic, Morrisons has a top up market share of £5.91m (zones 1-8) of the £44.86m available (13%). 13% of the turnover of the proposed Home Bargains food turnover is £0.09m – just 0.6% of

Morrisons' total turnover. It must be noted that this assessment assumes no inflow from tourism expenditure, so this level of trade diversion is likely to be an overestimate.

- 1.43 Diversion from town centre destinations is therefore likely to be very low, and the consequent impact on the town centre from the proposal will be *de minimis*.

The Impact on Town Centre Vitality and Viability, including Local Consumer Choice

- 1.44 As set out above, it is not likely that the proposals will have any detrimental effect on any planned investment in the city centre.
- 1.45 The above assessment has also demonstrated that the trade diversion from the town centres will not be material in planning terms. It would be highly unlikely to result in any consequent reduced footfall or an increase in vacancies within the city centre.
- 1.46 The Council's 2013 Retail Study indicated that at the time the study was undertaken, the vacancy rate in Bognor Regis town centre was 6.8%, substantially less than the national average of 14%. Only one unit was vacant in the Primary Shopping Area. The study indicates that the level of vacancy has remained consistently low since 2006, indicating some resilience of the town centre to the difficult prevailing economic conditions since then.
- 1.47 The Retail Study also indicates that local agents have been reporting that demand for town centre units is reasonable, with demand from larger retailers (many large multiple retailers are represented in the town centre). The main weakness of the town centre identified by local agents was indicated to be competition from other large centres such as Chichester, and an identified absence of modern accommodation in the town centre.
- 1.48 Overall, taking into account the full assessment undertaken in this section, we conclude that the application proposals would not result in any harm to the vitality and viability of the town centre.
- 1.49 The NPPF is clear that increased consumer choice can be considered a planning benefit. The application proposes that Unit 3 will be occupied by a retailer that is not already represented in Bognor Regis. This would therefore lead to an improvement in consumer choice which would be a planning benefit.

TURNOVER OF PROPOSED NEW UNIT

	Gross	Net	Turnover £ per sq m	Turnover £m	TABLE 1
Turnover of proposed Unit		949	551	2500	1.38
Notes: Turnover Source, Home Bargains					

TRADE DRAW OF PROPOSED UNIT

Survey Zone	% Trade Draw	£m	TABLE 2
1	9	0.13	
2	10	0.14	
3	14	0.19	
4	23	0.32	
5	15	0.21	
6	7	0.10	
7	4	0.05	
8	7	0.10	
9	2	0.02	
10	1	0.01	
11	0	0.00	
12	0	0.00	
13	6	0.09	
14	1	0.02	
15	0	0.01	
	100	1.38	

Notes: Based on Trade Draw of 'Bognor Regis Other' - Table 18 - Arun Retail Study 2013
 2011 prices

MARKET SHARES OF RETAIL DESTINATIONS SERVING PROPOSED UNIT CATCHMENT AREA £m (2018)

TABLE 3

Survey Zone	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total
Arundel	0.00	0.08	0.00	0.00	0.00	0.46	0.00	0.00	0.36	1.76	0.00	0.19	0.00	0.00	0.09	2.947966
Bognor Regis	6.59	8.80	8.41	20.01	7.39	5.33	1.71	3.89	0.88	0.63	0.68	0.00	3.58	0.95	0.32	69.19337
Bognor Regis Otr	3.03	3.23	4.40	7.35	4.83	2.27	1.24	2.20	0.56	0.19	0.00	0.00	2.05	0.47	0.14	31.96963
Littlehampton TC	0.08	0.22	0.06	0.00	0.82	0.72	1.55	0.57	0.28	1.16	0.32	0.67	14.62	3.98	0.93	25.99222
Littlehampton oth	0.05	0.07	0.02	0.33	0.72	0.61	1.07	0.29	0.22	1.25	1.28	0.47	10.03	5.72	1.19	23.30623
Rustington	0.00	0.00	0.00	0.21	0.18	0.05	0.13	0.38	0.01	0.32	0.59	1.49	2.66	10.83	2.85	19.70016
Ferring	0.23	0.00	0.00	0.00	0.00	0.13	0.06	0.00	0.00	0.02	2.75	0.79	2.08	1.03	0.18	7.268133
Arun Other	0.08	0.04	0.34	0.00	0.30	0.02	0.07	0.20	0.07	0.01	0.00	0.19	0.12	0.00	0.09	1.537226
Chichester	8.90	8.34	12.70	16.16	11.57	4.69	6.41	14.37	5.41	6.19	2.85	1.57	7.15	5.69	3.08	115.0785
Chichester Other	1.88	0.63	1.17	2.01	1.27	0.50	0.75	2.15	0.96	1.26	1.07	0.04	1.68	0.28	0.28	15.92648
Worthing TC	0.11	0.18	0.20	0.00	0.97	1.07	0.53	0.21	0.20	1.08	103.80	11.68	19.67	16.87	8.19	164.73720
Worthing Other																
Other	1.41	1.54	2.43	5.62	1.98	1.20	1.15	2.15	0.46	0.74	27.26	2.55	5.40	6.35	2.82	63.04929
Intermet	3.15	3.93	6.09	11.44	7.28	3.91	5.05	5.43	1.82	2.22	35.77	4.79	18.38	18.65	6.58	134.4835
Total	25.51	27.06	35.83	63.14	37.37	20.95	19.75	31.89	11.24	16.98	210.08	26.65	88.65	74.21	29.09	

Source Table 18 - Arun Retail Study 2013
 2011 proces

MARKET SHARES OF RETAIL DESTINATIONS SERVING PROPOSED UNIT CATCHMENT AREA %

TABLE 4

Survey Zone	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
Arundel	0	0	0	0	0	2	0	0	3	10	0	1	0	0	0	
Bognor Regis	26	33	23	32	20	25	9	12	8	4	0	0	4	1	1	
Bognor Regis Otr	12	12	12	12	13	11	6	7	5	1	0	0	2	1	0	
Littlehampton TC	0	1	0	0	2	3	8	2	3	7	0	3	16	5	3	
Littlehampton oth	0	0	0	1	2	3	5	1	2	7	1	2	11	8	4	
Rustington	0	0	0	0	0	0	1	1	0	2	0	6	3	15	10	
Ferring	1	0	0	0	0	1	0	0	0	0	1	3	2	1	1	
Arun Other	0	0	1	0	1	0	0	1	1	0	0	1	0	0	0	
Chichester	35	31	35	26	31	22	32	45	48	36	1	6	8	8	11	
Chichester Other	7	2	3	3	3	2	4	7	9	7	1	0	2	0	1	
Worthing TC	0	1	1	0	3	5	3	1	2	6	49	44	22	23	28	
Worthing Other	0	0	0	0	0	0	0	0	0	1	16	8	1	5	8	
Other	6	6	7	9	5	6	6	7	4	4	13	10	6	9	10	
Intermet	12	15	17	18	19	19	26	17	16	13	17	18	21	25	23	
Total	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	

Source Table 4

TRADE DIVERSION FROM RETAIL DESTINATIONS SERVING PROPOSED UNIT CATCHMENT AREA £M

TABLE 5

Survey Zone	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total
Arundel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bognor Regis	0.03	0.05	0.04	0.10	0.04	0.02	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.31
Bognor Regis Otr	0.02	0.02	0.02	0.04	0.03	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.14
Littlehampton TC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.03
Littlehampton oth	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.03
Rustington	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Ferring	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Arun Other	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Chichester	0.05	0.04	0.07	0.08	0.06	0.02	0.02	0.04	0.01	0.00	0.00	0.00	0.01	0.00	0.00	0.41
Chichester Other	0.01	0.00	0.01	0.01	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
Worthing TC	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.04
Worthing Other	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other	0.01	0.01	0.01	0.03	0.01	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.09
Intermet	0.02	0.02	0.03	0.06	0.04	0.02	0.01	0.02	0.00	0.00	0.00	0.00	0.02	0.01	0.00	0.24
	0.13	0.14	0.19	0.32	0.21	0.10	0.05	0.10	0.02	0.01	0.00	0.00	0.09	0.02	0.01	1.38

2011 prices

Source: Tables 3 and 4

IMPACT ON RETAIL DESTINATIONS SERVING PROPOSED UNIT 2018

TABLE 6

Town

	Benchmark Turnover	Actual Turnover	Bench Mark v Actual	Actual turnover with scheme	Actual turnover with scheme and commitm ents	Actual Turnover Commitm ents Only	Benchma rk v Actual with Commitm ents	Benchma rk v Actual with scheme and commitm ents	% town centre turnover diverted
Arundel	2.78	2.95	106	2.94	2.94	2.95	106	106	0.1
Bognor Regis Bognor Regis Other	65.42	69.19	106	68.88	65.36	65.39	100	100	0.5
Littlehampton TC	24.58	25.99	106	25.93	25.85	25.99	106	105	0.1
Rustington	18.62856522	19.70016	106	19.69	19.69	19.70016	105.7524	106	0.1

Source Table 2, 3 and 4
 2011 prices
 Commitments turnover estimated from report to Arun District Council Regarding BE37/13 June 2014

TURNOVER OF PROPOSED NEW UNIT

	Gross	Net	Turnover £ per sq m	Turnover £m	TABLE 1A
Turnover of proposed Unit		949	551	3077.495521	1.70
Notes: Turnover Source, Home Bargains					

TRADE DRAW OF PROPOSED UNIT

Survey Zone	% Trade Draw	£m	TABLE 2A
1	9	0.16	
2	10	0.17	
3	14	0.23	
4	23	0.39	
5	15	0.26	
6	7	0.12	
7	4	0.07	
8	7	0.12	
9	2	0.03	
10	1	0.01	
11	0	0.00	
12	0	0.00	
13	6	0.11	
14	1	0.02	
15	0	0.01	
	100	1.70	

Notes: Based on Trade Draw of 'Bognor Regis Other' - Table 18 - Arun Retail Study 2013
 2011 prices

MARKET SHARES OF RETAIL DESTINATIONS SERVING PROPOSED UNIT CATCHMENT AREA £m (2018)

TABLE 3A

Survey Zone	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 Total
Arundel	0.00	0.09	0.00	0.00	0.00	0.50	0.00	0.00	0.40	1.94	0.00	0.21	0.00	0.00	0.10 3.250117
Bognor Regis	7.27	9.71	9.28	22.06	8.15	5.88	1.89	4.29	0.97	0.70	0.75	0.00	3.95	1.05	0.35 76.28286
Bognor Regis Otr	3.34	3.56	4.85	8.10	5.33	2.50	1.37	2.43	0.62	0.21	0.00	0.00	2.26	0.52	0.16 35.24676
Littlehampton TC	0.09	0.25	0.06	0.00	0.91	0.79	1.71	0.63	0.31	1.28	0.36	0.74	16.12	4.39	1.02 28.65586
Littlehampton oth	0.05	0.08	0.03	0.36	0.79	0.67	1.18	0.32	0.25	1.37	1.40	0.52	11.06	6.30	1.31 25.69001
Rustington	0.00	0.00	0.00	0.23	0.19	0.05	0.14	0.41	0.01	0.35	0.65	1.64	2.94	11.94	3.15 21.71643
Ferring	0.26	0.00	0.00	0.00	0.00	0.14	0.06	0.00	0.00	0.03	3.02	0.87	2.29	1.14	0.19 8.001863
Arun Other	0.09	0.04	0.38	0.00	0.34	0.03	0.08	0.22	0.08	0.01	0.00	0.21	0.13	0.00	0.10 1.694851
Chichester	9.82	9.19	14.00	17.82	12.75	5.18	7.07	15.84	5.95	6.83	3.13	1.73	7.88	6.28	3.39 126.8631
Chichester Other	2.07	0.70	1.29	2.21	1.40	0.56	0.83	2.37	1.06	1.39	1.17	0.04	1.85	0.31	0.31 17.55479
Worthing TC	0.12	0.19	0.22	0.00	1.07	1.18	0.58	0.23	0.22	1.19	114.00	12.88	21.69	18.59	9.02 181.1890
Worthing Other															
Other	1.55	1.70	2.68	6.20	2.19	1.32	1.27	2.37	0.50	0.82	29.94	2.81	5.95	7.00	3.11 69.39768
Intermet	3.47	4.34	6.71	12.62	8.03	4.31	5.56	5.99	2.00	2.45	39.28	5.28	20.26	20.56	7.25 148.1188
Total	28.13	29.83	39.5	69.61	41.2	23.1	21.78	35.16	12.39	18.72	230.73	29.39	97.74	81.81	32.07

Source Table 18 - Arun Retail Study 2013
 2011 prices

MARKET SHARES OF RETAIL DESTINATIONS SERVING PROPOSED UNIT CATCHMENT AREA %

TABLE 4A

Survey Zone	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Arundel	0	0	0	0	0	2	0	0	3	10	0	1	0	0	0
Bognor Regis	26	33	23	32	20	25	9	12	8	4	0	0	4	1	1
Bognor Regis Otr	12	12	12	12	13	11	6	7	5	1	0	0	2	1	0
Littlehampton TC	0	1	0	0	2	3	8	2	3	7	0	3	16	5	3
Littlehampton oth	0	0	0	1	2	3	5	1	2	7	1	2	11	8	4
Rustington	0	0	0	0	0	0	1	1	0	2	0	6	3	15	10
Ferring	1	0	0	0	0	1	0	0	0	0	1	3	2	1	1
Arun Other	0	0	1	0	1	0	0	1	1	0	0	1	0	0	0
Chichester	35	31	35	26	31	22	32	45	48	36	1	6	8	8	11
Chichester Other	7	2	3	3	3	2	4	7	9	7	1	0	2	0	1
Worthing TC	0	1	1	0	3	5	3	1	2	6	49	44	22	23	28
Worthing Other	0	0	0	0	0	0	0	0	0	1	16	8	1	5	8
Other	6	6	7	9	5	6	6	7	4	4	13	10	6	9	10
Intermet	12	15	17	18	19	19	26	17	16	13	17	18	21	25	23
Total	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100

Source Table 4

TRADE DIVERSION FROM RETAIL DESTINATIONS SERVING PROPOSED UNIT CATCHMENT AREA £M

TABLE 5A

Survey Zone	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 Total
Arundel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.01
Bognor Regis	0.04	0.06	0.05	0.12	0.05	0.03	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.38
Bognor Regis Otr	0.02	0.02	0.03	0.05	0.03	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.18
Littlehampton TC	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00 0.04
Littlehampton oth	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00 0.03
Rustington	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.01
Ferring	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.01
Arun Other	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.01
Chichester	0.06	0.05	0.08	0.10	0.08	0.03	0.02	0.05	0.01	0.00	0.00	0.00	0.01	0.00	0.00 0.50
Chichester Other	0.01	0.00	0.01	0.01	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.06
Worthing TC	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.01	0.00 0.05
Worthing Other	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00 0.00
Other	0.01	0.01	0.02	0.03	0.01	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.00	0.00 0.11
Intermet	0.02	0.02	0.04	0.07	0.05	0.02	0.02	0.02	0.00	0.00	0.00	0.00	0.02	0.01	0.00 0.30
	0.16	0.17	0.23	0.39	0.26	0.12	0.07	0.12	0.03	0.01	0.00	0.00	0.11	0.02	0.01 1.70

2011 prices

Source: Tables 3 and 4

IMPACT ON RETAIL DESTINATIONS SERVING PROPOSED UNIT 2021

TABLE 6A

Town	Benchmark Turnover	Actual Turnover	Bench Mark v Actual	Actual turnover with scheme	Actual turnover with scheme and commitm ents	Actual Turnover Committe mnts Only	Benchma rk v Actual with Commitm ents	Benchma kr v Actual with scheme	% town centre turnover diverted
Arundel	3.09	3.25	105	3.24	3.24	3.25	105	105	0.2
Bognor Regis	72.58	76.28	105	75.90	72.38	72.48	100	100	0.5
Bognor Regis Other									
Littlehampton TC	27.27	28.66	105	28.58	28.50	28.66	105	105	0.1
Rustington	20.66845992	21.71643	105	21.70	21.70	21.71643	105.0704	105	0.1

Source Table 2, 3 and 4
 2011 prices
 Commitments turnover estimated from report to Arun District Council Regarding BE37/13 June 2014

