

ITM/PD8500

CHARTERED SURVEYORS

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18th December 2014

Simon Davies
Principal Planning Officer
Development Control
Arun Civic Centre
First Floor
1 Maltravers Rd,
Littlehampton,
West Sussex BN17 5LF

Dear Simon

UNIT 3 BOGNOR REGIS RETAIL PARK, SHRIPNEY ROAD, BOGNOR REGIS PO22 9TR

**APPLICATION FOR PLANNING PERMISSION FOR CHANGE OF USE FROM D2 TO A1 APPLICATION
REFERENCE BE/136/14/PL**

Thank you for your email of 10th December 2014. We have considered your email and write now with additional details in relation to emerging Policy OSR DM1 and also additional information relating to existing gym provision in Bognor Regis.

Emerging Policy OSR DM1

The policy in question was subject to Regulation 19 consultation closing on December 11th this year.

The National Planning Policy Framework (NPPF) provides guidance on the weight that can be given to emerging policies at paragraph 216. Weight can be given according to:

- *the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- *the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

The policy is the subject of an objection. In summary, the objection states that the restriction on the loss of private health clubs is not sound as it is not based on a robust evidence base. The NPPF is clear that policies should be based on an appropriate and up-to-date evidence base. There is no evidence that the protection of private health clubs in the District is warranted, and the strategic priorities set out in the Council's evidence base that is available do not refer to the protection of private health club space.

The policy is therefore not compliant with the NPPF, not based on an up-to-date relevant evidence base. Until this point is resolved by a Planning Inspector following the examination in public, the weight to be given to the emerging policy should be reduced.

This is notwithstanding any resolution to use an emerging policy document for development control purposes – if an emerging policy is the subject of an unresolved objection, then its weight must necessarily be less. The NPPF is clear on this point.

Existing Gym/Fitness Class Provision in Bognor

Notwithstanding the reduced weight that should be accorded to emerging policy OSR DM1, we have undertaken an analysis of existing gym provision in Bognor, which is set out Table 1 below.

Table 1 – Existing Gym Provision in Bognor

Name	Address	Facilities	Classes	Membership
Fitness First	Unit 3, Bognor Regis Retail Park PO22 9TR Bognor Regis	Gym Cardio Personal Training Spin Studio Sauna	Monday-Sunday Spinning/Weights/Yoga/Zumba/ Aerobics/Pilates	Monthly: £25-£58
Inspire Leisure	Felpham Way, PO22 8ED	Gym Swimming Pool Spin Studio Sports Hall 3G Synthetic Turf Pitch Multi Use Games Area Basketball Football Tennis Table Tennis Squash Volleyball Racket and equipment hire	Daily Zumba/Cycling/Pilates/ Swimming/ Aerobics Gymnastics & Trampolining Healthy Walks	Monthly: £10-£40
Arena Sports Centre	Westloats Lane, PO21 5JD	Gym 3G Football Pitches Community Rooms Climbing Wall Swimming Pool	Daily Yoga/Dance/Weights/Aqua Aerobics	Monthly: £20-£30 Annually: £120-250
Dream Fitness	64 High Street, PO21 1SP	24hr Gym Personal Training Massage Therapy	Monday – Saturday Fitness/Weights & Martial Arts (Minimum 2 per day)	Monthly: £12-£19 Annually: £130-£200
VK Gym	Unit 8, South Bersted Industrial Estate, PO22 9QT	Gym Boxing/Martial Arts Training	Monday/Tuesday/Thursday Zumba/Boxing/Yoga	Monthly: £15-£35 Annually: £140-£220
Resistance Gym	66 Hawthorn Road, Bognor Regis, West Sussex, PO21 2DD	Gym Personal Training	Personal Training Sessions	£20-£50 per month
The Laburnum Centre Gym	Lyon Street Bognor Regis West Sussex PO21 1UX	Gym	Monday-Friday Aerobics/Weights Line dancing Ballroom dancing Flower arranging Arts and crafts Yoga	Per Class: - Members £2.00 - Non Members £3.50

It can be seen that there are a number of other gym facilities available in Bognor.

Around 12% of the UK population is a gym member (this figure taken from the Business in Sport and Leisure handbook (BISL) 2009). The latest census data for the population of Arun District is 149,518 persons. Therefore, assuming gym membership to be in line with national averages, it can be calculated that there are 17,942 gym members in Arun District.

According to the same source, the average membership of a gym facility is 1,521 members. With 21 gyms in Arun District as a whole, there is provision for 31,941 members, resulting in an overprovision of 13,999 places.

The latest census data for the population of Bognor Regis is 63,885 persons. By using the same rationale as above, it is estimated that there are 7,666 people in Bognor Regis that hold a gym membership.

We understand there are six health clubs (excluding the fitness first) in Bognor Regis, with an estimated provision for 9,126 members. Consequently, even without Fitness First, Bognor Regis would still have a surplus of some 1,460 places.

Fitness First has the most expensive range of membership options, so membership of an alternative facility in the event of Fitness First's closure would not be prohibitively expensive to existing Fitness First Members. Several alternatives are considerably cheaper.

We have also analysed the range of fitness classes available to Fitness First members. These include yoga, Pilates, Zumba, spinning and aerobics. All of these classes are duplicated elsewhere; we have not identified any classes run by Fitness First that are not available at one of the other facilities within the town.

We note also that several of the other facilities run sessions that are specifically targeted at particular segments of the community. Inspire Leisure runs a Healthy Walks programme that promotes organised walks that are free of charge, open to all ages and actively encourage participants to socialise with one another. The walks take place on a twice weekly basis. The Centre also runs free 'well-being for children' sessions for children aged 6-16 who are over their recommended weight for their height and age.

In addition to Inspire Leisure, the Laburnum Centre on Lyon Street specifically caters for elderly users and offers a wide range of tailored classes. In addition, the Centre offers reasonably priced lunches, day excursions and holidays. The Centre provides an ideal meeting place for elderly people along with subsidised transport to collect and return customers to their door, ensuring the Centre is accessible to elderly people throughout the local area.

The above analysis all relates to 'formal' gym and instruction provision. There are also a wide variety of fitness classes run in less formal settings, such as community centres and church halls, and private instructors operating from their own home. Examples include:

- The Body Suite at Bishop Tufnell Primary School (Pilates);
- Annsyoga at Shanti Cottage (yoga);
- FAByoga at Rowland Rank Centre (Yoga);
- Zumba Fitness at Bognor Regis Youth and Community Centre (Zumba);
- Zumba Gold at Bognor Regis Youth and Community Centre (Zumba for older adults);
- Bootcamp at King George V Fields (interactive exercises and sports drills).

There are many more informal facilities besides those listed.

In summary, there is suitable alternative provision in Bognor Regis to ensure the loss of Fitness First would not significantly adversely impact on the range of facilities and classes available to the local community. Quantitatively, there are sufficient gym spaces within the town and qualitatively, instruction and fitness classes are duplicated elsewhere. We do not consider the loss of Fitness First to conflict with emerging Policy OSR DM1, notwithstanding the reduced weight that can be given to the policy.

It does not follow that participation rates in indoor exercise will drop following the closure of Fitness First. There are other facilities and classes in the town available for use by the local population.

Other material considerations

We note that the Council's Economic Development section supports the application. They have also in their consultation response accepted that there are no alternative sequentially preferable locations where the proposed retail use could locate.

Just to clarify on employment, the proposed use will be 44 Full Time Equivalent (FTE) jobs. This is an increase in employment over the current use of the unit. Some of these will be part time, but that is a benefit as part time hours provide flexibility for many people in the workplace, particularly working parents. The range of jobs available will be at all levels required for a retail operation, from shop floor staff through to management. TJ Morris also offer fast track retail management training to candidates who do not have previous retail experience. Career progression is possible to area and regional management.

There will be additional 'spin-off' job opportunities arising from the fit out of the unit, maintenance, cleaning and security staff etc.

The NPPF is clear that employment creation should be given significant weight in the determination of the planning application.

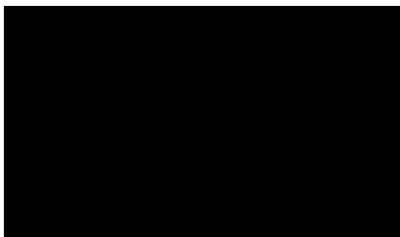
Summary

There is no demonstrable harm arising from the planning application proposals. There are adequate gym and fitness facilities within the town to accommodate the full range of facilities and activities that will be lost from the closure of the gym. The proposals meet the sequential assessment and are welcomed by the Council's Economic Development team. There will be substantial employment opportunities created.

Paragraph 14 of the NPPF confirms the presumption in favour of sustainable development and states that where plans are out of date (as is the case in Arun), 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. There are no adverse impacts that 'significantly and demonstrably' outweigh the planning benefits that arise from this application. Planning permission should therefore be granted.

I hope that you find the enclosed helpful, but please do contact me if you have any further queries.

Yours sincerely



Tim Miles
MONTAGU EVANS LLP