

Planning and Retail Statement

**Proposed Business park and Foodstore, Oldlands
Farm, Bognor Regis**

**ASDA Stores Ltd and Trustees of the Langmead
Estate**



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Planning and Retail Statement

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1.	Introduction	1
2.	The Site and Surrounding Area	2
3.	The Proposals	3
4.	Relevant Policy Guidance	6
	National policy guidance	6
	Regional Guidance	13
	Local Policy Guidance	15
	Planning White Paper	18
5.	Main Planning Considerations	21
6.	Flooding	22
7.	Employment uses	25
	Evolution of proposals for a business park at Oldlands Farm	25
	Need for enabling development to fund the business park	27
	Loss of employment land	27
	Summary	28
8.	Need for retail development	29
	Household survey	29
	Existing Food Store Provision	32
	Quantitative need for retail development	33
	Qualitative need assessment	37
9.	Sequential assessment	40
	Town centre sites	42
	Edge of centre sites	42
	Summary	46
10.	Effect of the proposed foodstore	47
	Health check of Bognor Regis town centre	47
	Assessment of trade diversion	52
	Summary	54
11.	Summary	55

Appendices

- 1 – Viability assessment**
- 2 – Plan of Study Area and foodstore provision**
- 3 – Quantitative assessment**
- 4 – Plan of sites in sequential assessment**



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

1. Introduction

- 1.1 This Statement has been submitted on behalf of ASDA Stores Ltd and the Trustees of the Langmead Estate for the following development at Oldlands Farm, Bognor Regis:

Mixed-use employment (Use Class B1, high quality business park comprising up to 19,500 sqm gross floorspace) and retail (Use Class A1 grocery store of up to 4,459 sqm net sales area), together with parking, new highway and associated servicing, infrastructure and landscaping.

- 1.2 This Statement takes the following form. **Section 2** describes the site and surrounding area. The proposals are described in **Section 3**.
- 1.3 **Section 4** contains a review of relevant national, regional and local planning policy guidance. The main planning considerations raised by the proposals are identified in **Section 5**.
- 1.4 **Section 6** contains an assessment of the proposals' compliance with national guidance on flooding. The proposed employment uses are assessed in **Section 7**.
- 1.5 The need for retail development in Bognor Regis is examined in **Section 8**. The sequential approach to retail development is set out in **Section 9**. The effect of the foodstore is assessed in **Section 10**.
- 1.6 A summary and conclusions are set out in **Section 11**.

Supporting Documents

- 1.7 The application is accompanied by the following documents:
- (a) Design and Access Statement (HGP);
 - (b) Environmental Statement, including flooding assessment (Drivers Jonas); and
 - (c) Transport Assessment (Cottee Transport Planning).

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

2. The Site and Surrounding Area

- 2.1 Oldlands Farm forms part of an approved urban extension to the north of Bognor Regis. At present, the land is currently in agricultural use and there are no buildings on the site.
- 2.2 In total, the land identified under Site 6 extends to approximately 20 hectares (50 acres), with the first phase of development that is the subject of this planning application comprising 8 hectares (20 acres) and the remaining land (12 hectares/30 acres) to be developed in subsequent phases, subject to resolution of flooding issues.
- 2.3 The northern boundary of the site is defined by the North Bognor Regis Relief Road which forms a key element of the proposals for development at Site 5 and Site 6. Barratts has recently applied for detailed planning permission for the road. Beyond this lies farmland and the village of Shripney.
- 2.4 The western perimeter of the site is bounded by the A29 Shripney Road and is contained partly behind hedgerows. Beyond the A29 is a mobile home leisure park, and beyond that open farm land.
- 2.5 To the south lies a track which serves the Oldlands Farm buildings which are partly derelict, although the farmhouse is still occupied. This track is partly contained by hedgerows.
- 2.6 Beyond that to the immediate south is the Southern Cross Industrial Estate. At the south west corner of the site is a roundabout on the A29 which gives access to the Southern Cross Industrial Estate via Steyning Way with Rowan Way leading to North Bersted in the west and Bognor Regis town centre to the south. On the opposite corner of the roundabout from the site is the Bognor Regis Retail Park.
- 2.7 On the eastern boundary is the Barnham/Bognor Regis railway line. Beyond that it is mainly farm land, a disused air strip and Bognor Regis Golf Course and the site of the proposed Policy 6 housing.
- 2.8 The site has good links into Bognor Regis town centre via the A29 which lies just over 2 kilometres to the south and will be linked directly to Felpham in the east and North Bersted in the west via the North Bognor Regis Relief Road.
- 2.9 The site does not have any relevant planning history except for an allocation for a high quality business park development in the Adopted Local Plan. This is examined in Sections 3 and 4.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

3. The Proposals

3.1 Land at Oldlands Farm is allocated in the Adopted Local Plan for a high quality business park development and it acknowledges the possibility that it could be developed in phases.

3.2 The application seeks outline planning permission for:

Mixed-use employment (Use Class B1, high quality business park comprising up to 19,500 sqm gross floorspace) and retail (Use Class A1 grocery store of up to 4,459 sqm net sales area), together with parking, new highway and associated servicing, infrastructure and landscaping.

3.3 Approval is sought for access and layout, with appearance, landscaping and scale reserved for future approval.

3.4 In accordance with the acknowledgement in the Adopted Local Plan, this application relates only to the first phase of development on Oldlands Farm. As acknowledged in the Plan, work is required to resolve flooding/drainage constraints associated with the development of the remainder of the site, and as ASDA and the Trustees have not progressed that work, it is appropriate that this application relates only to the first phase of development of the land that lies outside of the floodplain.

3.5 The detailed approach to the design of the site is explained in the Design and Access Statement prepared by HGP Architects. This is a separate supporting document to this application.

3.6 In summary, the overall objective is to develop a high quality business development at Oldlands Farm totalling some 19,500 sq m (gross) with an ASDA foodstore (7,507 sq m gross). This is shown on the illustrative Master Plan drawing (ref: 05.058.18).

3.7 A central spine road is proposed that leads from the A29 to an internal distributor roundabout. This forms the basis of dividing the site into five development plots, as well as providing two access routes to later phases of development. Four of the plots are proposed for business use and one of the plots for the foodstore.

Business uses

3.8 The illustrative Master Plan drawing (ref: 05.058.18) shows how the proposed 19,500 sq m (gross) of business floorspace could be developed on the site.

3.9 The four business plots comprise the main gateway site adjoining the A29. Appropriate landmark buildings are envisaged on Plots I and E, with E being built out at the same time as the ASDA store on a speculative basis. Land opposite this on the north side of the internal road would accommodate several large office buildings. Land to the east of the roundabout (Plot D) would provide a medium sized office building and land to the south of the roundabout (Plots F, G and H) could provide several buildings.

3.10 The landscaping that is proposed for the business park is high quality. This is necessary to ensure that an appropriate standard of design and character is achieved across the whole site. This is shown on landscape drawing (ref: 271.01).

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 3.11 Overall, the business park would be served by up to 638 car parking spaces, as well as the dedicated bus route.
- 3.12 It is estimated that around 1,200 people could be employed in the various offices buildings within the business park. There will be indirect jobs created that will support the business park, for example in maintaining the landscaping, cleaning the buildings and providing catering. It is difficult to estimate the number of indirect jobs that could be created and supported, however for a business park development of this scale and quality, it is reasonable to assume that indirect employment would be significant.
- ASDA foodstore**
- 3.13 The foodstore will be located in the south west corner of the site with a gross floorspace of 7,500 sq m and a net sales area of 4,459 sq m. The design of the store is generic to ASDA's 'concept' store. This standard of design and finish is appropriate for this gateway site.
- 3.14 The store will sell a range of convenience and comparison goods (2,973 sq m and 1,486 sq m, respectively). There will be a café in the store, but there will not be a petrol filling station. In the convenience sector, the store will provide a delicatessen, fish counter, bakery and salad bar, and will sell general convenience goods. In the comparison sector, the store will sell a range of non-food goods, including general household goods and the company's clothing range, 'George'.
- 3.15 It is important to note that the non-food goods that will be sold will include 'bulky goods', such as DIY goods, home furnishings and gardening products.
- 3.16 The non-sales floorspace within the store will be used in a number of ways. First, as storage because modern food stores hold a greater amount of stock on-site. Second, as colleague facilities, including changing rooms, rest rooms, restaurant, training and office facilities. Third, as food preparation areas for the cooking of pizzas and other pre-cooked meals. The sale of pre-cooked meals is an important element of the convenience sales within ASDA stores.
- 3.17 Cottee Transport Planning's Transport Statement explains how the whole scheme, and the foodstore in particular, will be fully integrated within the existing and proposed public transport network. There will be dedicated cycle bays provided in front of the store.
- 3.18 For shoppers using public transport, a dedicated bus bay will be provided adjacent to the store and access will be direct from the A29 via a dedicated access. Details of services are provided by Cottee, and these show that the site is accessible for shoppers using public transport and that its proximity to the proposed business uses has the potential to encourage more efficient shopping/work trips.
- 3.19 For those customers travelling by car, up to 600 car parking spaces will be provided, including full provision for disabled and parent and child spaces. This is line with the relevant parking standards.
- 3.20 ASDA estimate that the new store would create around 240 'new' jobs. A range of skills will be required for these jobs and ASDA run training courses locally to ensure that the skills the company need are recruited locally.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Phases

- 3.21 The intention is that within Phase I, all of the landscaping and internal roads will be provided, together with the ASDA foodstore and a speculative office building on Plot E of some 1,100 sq m. The remaining buildings plots would be available as serviced development land.
- 3.22 It is assumed that outline planning permission would be granted by the middle of 2009 and that construction would start in 2010 after all reserved matters have been discharged. Construction is anticipated to take up to one year to complete.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

4. Relevant Policy Guidance

National policy guidance

4.1 In assessing the development proposals, consideration must be given to national policies contained within Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). These documents set out the Government's underlying principles for land use planning. They form the strategic context and set the foundations for formulating development plan policies.

4.2 Of particular relevance to the proposal is:

- PPS 1: 'Delivering Sustainable Development'
- PPG 4: 'Industrial, Commercial Development and Small Firms'
- PPS 6: 'Planning for Town Centres'
- PPG 13: 'Transport'
- PPS 25: 'Development and Flood risk'

PPS 1 - Delivering Sustainable Development

4.3 PPS 1 outlines the Government's vision for planning, and the key policies and principles which should underpin the planning system.

4.4 The key points are the promotion of:

- Sustainable development
- Brownfield development
- Urban regeneration
- Higher densities
- Mixed use development.

4.5 Planning should facilitate and promote sustainable and inclusive patterns of urban development by:

- making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;
- contributing to sustainable economic development;
- ensuring high quality development through good and inclusive design, and the efficient use of resources; and
- ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

4.6 Under the heading of sustainable economic development, it advises that:

"The Government is committed to promoting a strong, stable, and productive economy that aims to bring jobs and prosperity for all. Planning authorities should:

(i) Recognise that economic development can deliver environmental and social benefits;



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- (ii) *Recognise the wider sub-regional, regional or national benefits of economic development and consider these alongside any adverse local impacts;*
- (iii) *Ensure that suitable locations are available for industrial, commercial, retail, public sector (e.g. health and education) tourism and leisure developments, so that the economy can prosper;*
- (iv) *Provide for improved productivity, choice and competition, particularly when technological and other requirements of modern business are changing rapidly;*
- (v) *Recognise that all local economies are subject to change; planning authorities should be sensitive to these changes and the implications for development and growth;*
- (vi) *Actively promote and facilitate good quality development, which is sustainable and consistent with their plans;*
- (vii) *Ensure the provision of sufficient, good quality, new homes (including an appropriate mix of housing and adequate levels of affordable housing) in suitable locations, whether through new development or the conversion of existing buildings. The aim should be to ensure that everyone has the opportunity of a decent home, in locations that reduce the need to travel;*
- (viii) *Ensure that infrastructure and services are provided to support new and existing economic development and housing;*
- (ix) *Ensure that development plans take account of the regional economic strategies of Regional Development Agencies, regional housing strategies, local authority community strategies and local economic strategies; and,*
- (x) *Identify opportunities for future investment to deliver economic objectives."*

- 4.7 Sustainable development is a key focus and planning policies should seek to achieve the following specific objectives:

"Promote national, regional, sub-regional and local economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors" (Paragraph 27 (i)).

- 4.8 Achieving the highest quality of design and inclusive design are important objectives of PPS1. The approach taken to designing Oldlands Farm Business park is explained in the Design and Access Statement.
- 4.9 Additionally, PPS1 places great emphasis on community involvement in the planning process. The outcome of ASDA's consultation exercise is explained in the statement of pre-application consultation prepared by Local Dialogue.
- 4.10 The proposed business park and retail development accord with the guidance in PPS1 as it is a high quality, well designed and sustainable development.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

PPS 6 - Planning For Town Centres (March 2005)

- 4.11 Planning Policy Statement 6 (PPS6) sets out the Government's approach to the provision of town centre uses. The key objective of PPS6 is to promote the vitality and viability of town centres, both by planning for the growth of existing centres and by promoting and enhancing existing centres. This can be achieved by focusing development in such centres and encouraging a wide range of services in a good quality environment, which are accessible to all.
- 4.12 The Statement sets out further objectives which should be addressed as a means by which to achieve the overall key objective:
- Enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community, and particularly socially excluded groups;
 - Supporting efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity; and
 - Improving accessibility, ensuring that existing or new development is, or will be, accessible and well served by a choice of means of transport.
- 4.13 Given these key objectives, paragraph 1.7 confirms that the objectives of PPS6 should not conflict with the interests of business. It states that:
- "It is not the role of the planning system to restrict competition, preserve existing commercial interests or to prevent innovation."*
- 4.14 Section 3 of PPS6 sets out the considerations which should be taken into account by Local Planning Authorities in determining planning applications for all proposals relating to main town centre uses.
- 4.15 Paragraph 3.1 of PPS6 confirms that the considerations apply to the redevelopment of existing facilities as well as to the development of new facilities and at 3.4 that applicants should be required to demonstrate the following:
- (a) The need for the development;
 - (b) That the development is of an appropriate scale;
 - (c) That there are no more central sites for the development;
 - (d) That there are no unacceptable impacts on existing centres; and
 - (e) That locations are accessible.
- 4.16 Paragraph 3.7, however, highlights that:
- "The level of detail and type of evidence and analysis required to address the key considerations should be proportionate to the scale and nature of the proposal."*
- 4.17 These requirements are considered in more detail below and in the following sections of this Planning and Retail Statement.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

a) The need for the development

- 4.18 PPS6 requires that need must be demonstrated for any application for a main town centre use which would not be in a town centre location and which is not in accordance with an up-to-date development plan document.
- 4.19 In the case of retail development, need assessments should relate directly to the class of goods to be sold from the development. We outline below that the proposals accord with an up-to-date development plan and in Section 6 that there is a quantitative need for the type of goods proposed to be retailed from the application site.
- 4.20 In assessing the need and capacity for additional retail development, greater weight should be placed on quantitative need for additional floorspace for the specific types of retail development proposed. PPS6 does however acknowledge that account should also be taken of qualitative considerations. We demonstrate in Section 8 that there is a quantitative and qualitative need for a new store of the size proposed.
- 4.21 In summary, the proposal will result in an improved range and choice of grocery floorspace within Bognor Regis, substantially reduce outflows of trade to Chichester and Littlehampton, provide residents with lower prices and thereby assist in social regeneration. All of these benefits were recognised and welcomed by residents at the consultation event.

b) The scale of development

- 4.22 The guidance states that the scale of development proposed should relate to the role and function the centre will play within the wider hierarchical network of centres. Scale should also relate to the catchment population that the development proposes to serve.
- 4.23 PPS6 acknowledges that some larger retail proposals will not be appropriate in smaller local centres. In particular, paragraph 2.42 comments:

"Given their characteristics, local centres will generally be inappropriate locations for large-scale new development, even when a flexible approach is adopted."

- 4.24 We consider that the retail proposals will be of a scale appropriate to the retail hierarchy in Bognor Regis and will enhance the retail provision in Bognor Regis to the benefit of the local community. This is addressed in more detail in Section 8 of this Statement.

c) The sequential approach to site selection

- 4.25 PPS6 requires that a sequential approach to site selection should be applied to all development proposals for main town centre uses for sites that are not in an existing centre, nor allocated in an up-to-date development plan document.
- 4.26 The sequential approach requires that locations are considered in the following order:
- First, locations in appropriate existing centres, taking account of an appropriate scale of development in relation to the role and function of the centre; and then
 - Edge-of-centre locations, with preference given to sites that are well-connected to the centre; and then



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- Out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre."
- 4.27 The sequential analysis set out in Section 9 demonstrates that there are no suitable, viable or available sites for a foodstore development of the scale and type needed to deliver the much needed benefits to residents. The scope for a foodstore to be provided in the schemes under consideration for Hothampton or The Regis Centre are also considered.
- d) The impact of development on existing centres
- 4.28 Paragraph 3.20 of PPS6 requires that impact assessments are undertaken for any application for a main town centre use which would not be in a town centre location and which is not in accordance with an up-to-date development plan strategy.
- 4.29 An assessment should consider the impact of a proposal on the vitality and viability of an existing centre or centres likely to be affected, taking account of the following:
- The extent to which the development would put at risk the spatial planning strategy for the area and the strategy for a particular centre or network of centres, or alter its role in the hierarchy of centres;
 - The likely effect on future public or private sector investment needed to safeguard the vitality and viability of the centre or centres;
 - The likely impact of the proposed development on trade/turnover and on the vitality and viability of existing centres within the catchment area of the proposed development;
 - Changes to the range of services provided by centres that could be affected;
 - Likely impact on the number of vacant properties in the primary shopping area;
 - Potential changes to the quality, attractiveness, physical condition and character of the centre or centres and to its role in the economic and social life of the community; and
 - The implications of proposed leisure and entertainment uses for the evening and night-time economy of the centre.
- 4.30 We demonstrate in Section 10 of this statement that the proposed ASDA store will not harm the vitality and viability of Bognor Regis town centre, with most of the trade to the new store being diverted from the out-of-centre Tesco store at Shripney Road and other stores at Chichester and Littlehampton. Our analysis of the health of Bognor Regis town centre concludes that it is a healthy and attractive centre.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

e) The accessibility of locations

4.31 The guidance states that, in considering proposed new developments, local planning authorities should have regard to:

- Whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car; and
- The impact on car use, traffic and congestion.

4.32 The business park and ASDA store will be accessible to employees and shoppers by a choice of means of transport. Transport matters are addressed in further detail in the Transport Assessment prepared by Cottee Transport Planning.

Other Material Considerations

4.33 In addition to the considerations discussed above, PPS6 states that the following material considerations may also be taken into account:

- Physical regeneration;
- Employment creation;
- Economic growth; and
- Social inclusion.

4.34 These are relevant to this proposal as:

- (a) physical regeneration – the business park will play an important role in the local economy by allowing local businesses to expand/relocate and for their premises to be refurbished/redeveloped, thereby improving the business sector as a whole;
- (b) employment creation – the first phase of the business park will create a significant number of jobs, around 1,200 direct jobs with further indirect employment, which will be in addition to those created in the ASDA store at various skill levels, thereby achieving a net improvement in the quality and range of local employment opportunities;
- (c) economic growth – the businesses that will come to the business park, as well as the ASDA store, will support the expansion of the local economy, and the wages/salaries earned by employees will be circulated into the local service economy, in particular the town centre
- (d) social inclusion – creating jobs with varying skill levels at the business park and ASDA store and the cheaper prices available at the ASDA store will lead to greater social inclusion.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

PPG 13 - Transport

- 4.35 The advice on locating new retail development is reinforced by the Planning Policy Guidance Note on Transport. The key aims of the Guidance are set out in the introductory text, namely to integrate planning and transport at the national, regional, strategic and local level to:

- Promote more sustainable transport choices for both people and for moving freight;
- Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and
- Reduce the need to travel, especially by car.

- 4.36 Paragraph 35 sets out the guidance relating to shopping development:

"Policies for retail and leisure should seek to promote the vitality and viability of existing town centres, which should be the preferred locations for new retail and travel intensive leisure development. At the regional and strategic level, local authorities should establish town centre hierarchies, taking account of accessibility by public transport, which identify locations for major investment. At the local level, local authorities should adopt a sequential approach to identifying preferred locations and selecting sites for new retail and leisure developments. This means preference should be given to town centre sites, followed by edge of centre and, only then, out of centre sites in locations which are (or will be) well served by public transport. Where there is a clearly established need for such development and it cannot be accommodated in or on the edge of existing centres, it may be appropriate to combine them with existing out of centre developments, provided that improvements to public transport can be negotiated."

- 4.37 As noted, the Transport Assessment prepared by Cottee Transport Planning demonstrates that the site is an accessible location and together with planned improvements in public transport services, it will be accessible for employees and shoppers using a choice of means of transport.

PPS 25 – Development and flood risk

- 4.38 Planning Policy Statement 1: Delivering Sustainable Development sets out the Government's objectives for the planning system, and how planning should facilitate and promote sustainable patterns of development, avoiding flood risk and accommodating the impacts of climate change.

- 4.39 An important theme in the guidance is that risk is appraised, managed and reduced.

- 4.40 It advises that:

LPA's should in determining planning applications:

- *have regard to the policies in this PPS and, as relevant, in the RSS for their region, as material considerations which may supersede the policies in their existing development plan, when considering planning applications for developments in flood risk areas before that plan can be reviewed to reflect this PPS;*

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- ensure that planning applications are supported by site-specific flood risk assessments (FRAs) as appropriate;
- apply the sequential approach (see paras. 14–17) at a site level to minimise risk by directing the most vulnerable development to areas of lowest flood risk, matching vulnerability of land use to flood risk;
- give priority to the use of SUDS; and
- ensure that all new development in flood risk areas is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed.

Regional Guidance

RPG9 - Regional Planning Guidance for the South East

- 4.41 RPG 9 covers the period up to 2016 and was published in March 2001. The guidance sets out the broad strategic planning policies as well as a broad development strategy for the region.
- 4.42 A draft South East Plan was submitted to Government in March 2006. An Examination in Public has been held and the Panel's report was published in August 2007. It is expected that the South East Plan will be approved in late 2008.
- 4.43 The objectives of the Spatial Strategy set out at paragraph 4.2 are:
- The need to plan positively for a reasonable level of economic growth, with consequent labour supply, and appropriate management of physical and social infrastructure implications,*
 - The need for further measures to reduce economic and social disparities in the region,*
 - The need to promote a sustainable balance between economic prosperity, environmental quality, social well-being and a high quality of life in the South East,*
 - The need for high priority to regenerate the coastal towns, and*
 - The need to ensure high quality development.*

- 4.44 The draft South East Plan endorses many of the key principles and objectives of national planning policy guidance, in particular the commitment to town centres and achieving a high quality of design and sustainable development.
- 4.45 The proposed business park and ASDA store are consistent with these objectives.

West Sussex Structure Plan 2001 - 2016 (February 2005)

- 4.46 The West Sussex Structure Plan 2001 – 2016 was adopted in February 2005. The strategic aim is to promote wider economic health and prosperity, social progress and environmental protection.
- 4.47 The Structure Plan is part of the development plan against which the proposal will be assessed. It has a strong emphasis on sustainable development and the promotion of economic opportunities. It also considers retail development in the county.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 4.48 Policy LOC1 states that land to the north of Bognor Regis (Bersted/Felpham) is allocated as a large-scale mixed use development to provide 1,350 new homes. It confirms that the principle of strategic-scale development at the location continues to be acceptable.
- 4.49 Policy NE5 states that development which would result in the loss of existing employment land or allocations should not be permitted where they are important in maintaining the supply of premises and jobs in an area. The proposal complies with this policy as it will bring the site forward for business park use.
- 4.50 Policy DEV6 states that *'development in the strategic locations and the urban area'* should:
- "Meet the needs of the communities of West Sussex for homes, jobs, facilities, and service".*
- 4.51 In doing so, the Structure Plan states that local plans should:
- Specify the phase in which allocations on previously developed and greenfield sites should be developed,
 - Secure an appropriate mix of types and sizes of premises in the redevelopment of existing employment areas and in new employment development,
 - Ensure the provision of a range of locations, types and sizes of employment premises and sites by safeguarding land or premises or allocating land and permitting new employment uses to meet the locational strategy and have regard to the needs of specific sectors of the business community.
- 4.52 The range of size and types of sites provided should meet the needs of a range of economic activities to include:
- "Small and starter businesses, firms providing high-value goods and services and those requiring prestige accommodation to allow for new job opportunities in a range of sectors".*
- 4.53 The proposed business park will provide a range of accommodation and types of business space for various types of businesses. Therefore, it is consistent with Policy DEV6.
- 4.54 Policy NE9 requires that development, including retail development, should be provided in existing urban areas if it helps them to adapt and reinforce their role in meeting needs, acting as the focus for a range of activities and as a focus for integration of transport. It also states that the local plans should maintain or improve the retail function of established centres, and allocate suitable sites or area for additional retail and other development within the centres to meet any identified need. Sites are allocated for development in Bognor Regis town centre and the proposed ASDA store will not undermine either the town centre or these proposals.
- 4.55 Policy NE10 addresses retail development which cannot be accommodated within existing centres to ensure that it meets an identified need and does not undermine the vitality, viability and retail function of centres.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

4.56 The policy states that local authorities should ensure that new or improved retail development outside of the existing town, village, district and neighbourhood centres should:

- Complement the existing shopping on offer by providing a range and type of facilities which cannot be accommodated within an existing centre following the adoption of a sequential approach to site selection,
- Is of a scale and nature no greater than that required to meet any identified need,
- Does not adversely affect the vitality and viability of any nearby centre as a whole, either as an individual development or cumulatively with similar existing or proposed developments, and
- Offers realistic, safe and easy access by a range of transport modes, not exclusively by car.

4.57 As noted, there is not a site suitable, available or viable for the proposed ASDA store in the town centre, the store is of a scale to meet the identified need, it will not harm the vitality and viability of the town centre and it will be accessible by a choice of means of transport.

4.58 Therefore, the proposed business park and ASDA store accords with the objectives and policies of the Structure Plan.

Local Policy Guidance

Arun District Local Plan 2003

4.59 The Arun District Local Plan 2003 was adopted on 17 April 2003. The Plan period covers the period up to 2011.

4.60 The Council is currently progressing the new Local Development Framework (LDF). The Core Strategy will be published for a further round of consultation in October 2008 following the Panel's Report into the draft South East Plan which recommended that housing numbers in the District should be increased.

4.61 The site is allocated as an employment site as part of policy site 5 and 6.

4.62 Policy Site 5 'Commercial Allocations' designates the land to the North of Oldlands Farm, North Bersted as a employment site to encourage the provision of adequate job opportunities for the resident workforce.

4.63 The text to Policy Site 6 explains the allocation in more detail. Specifically it states that provision is made for:

- 11.25 hectares of development for a high quality Business park, accommodating uses generally falling within Class B1 of the Use Classes Order, although uses falling within Classes B2 and B8 will be permitted if they contribute to the regeneration objectives for Bognor Regis and are of a high quality design.
- An 11.8 hectare reserve for an extension to the Business park, subject to the resolution of flooding issues and
- The provision of a relief roads to form part of the Strategic Road network.

4.64 The policy also states that permission will only be granted for proposals which demonstrate that the whole of Site 6 can be developed in a 'comprehensive and co-ordinated manner'.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 4.65 The negotiations with the Council since March 2007 have demonstrated that a phased approach can be taken to the development of the whole site and that this application relates to the first phase of development. Separate work is needed to design the later phases of development and resolve the identified flooding constraint. This has always been acknowledged in the site's allocation. Therefore, the proposal is consistent with the objectives for the site.
- 4.66 Policy DEV26 seeks to ensure that the existing hierarchy of retail centres within Arun is maintained. It states that retail development which accord with the existing hierarchy will be permitted provided that they are of a high quality, easily accessible by public transport, cycle, foot and people with disabilities, and the design incorporates crime prevention measures.
- 4.67 Policy DEV27 sets out the requirements for retail developments outside the Principal Shopping Areas for non-food retail and food retail. Such proposals will only be permitted if the proposal does not:
- 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 development,
 - It is easily accessible by the highway network and public transport,
 - It includes provision for access for cycle and on foot, as well as access for people with disabilities.
- 4.68 The proposed ASDA store satisfies the requirements of Policy DEV27.
- 4.69 The policy also states that applications for major developments will need to be accompanied by a full assessment of the potential impact on town centres and nearby centres. This statement satisfies that requirement.
- 4.70 Applications proposing retail developments on out of centre sites will need to demonstrate that no alternative suitable sites can be found firstly in the existing town centre or secondly on the edge of the centre. The policy also states that applicants will be required to demonstrate that there is a need for additional facilities. This statement demonstrates that there is a need for the ASDA store (Section 8) and there are no sequentially preferable sites available, suitable or viable for the ASDA store (Section 9).
- 4.71 Where permission is granted, the policy also states that it may be subject to a planning condition or legal agreement to restrict the range of products sold. ASDA would be willing to discuss an appropriate condition or agreement with the Council.
- Draft Development Brief and Conceptual Master plans (July 2003)***
- 4.72 The draft Development brief was produced for public consultation in July 2003. The Brief identifies a framework for developing the land allocations identified for Oldlands Farm. Essentially the Brief is a guide which explains/clarifies Policy Site 6 and the way in which the scheme can be delivered.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 4.73 In assessing the allocation of Oldlands Farm in the Local Plan the Inspector stated in his report May 2002:

"The remaining site of 11.2ha north of Oldlands Farm is intended to provide for a high quality Business park as part of the strategy for the regeneration of Bognor Regis. As discussed in Chapter 3 I have much sympathy with this strategy, and I have heard no compelling evidence that there is a better way forward.... Given the present image and the apparent low demand for business premises in the town centre, a 'pump priming' high quality Business park as part of an urban extension seems to me to be a practical approach to the problems facing Bognor Regis".

- 4.74 In terms of phasing the site appraisal states:

The land covers approximately 23.05 hectares of land, split into 11.25 hectares of development land and 11.8 hectares of reserve development land (subject to resolution of flooding issues).

- 4.75 Key features of the guidance and how the proposed development satisfies these are:

- (a) the proposed development has the potential to create a prime location for business in the area and to create an attractive working environment (paragraph 4) – this is demonstrated in the Design and Access Statement,
- (b) the Council will not permit development on the allocated site until a full assessment of site levels, ground and geological conditions and drainage has been carried out and been agreed (paragraph 7) – this information is provided in support of the application,
- (c) the Council will require a detailed traffic assessment (paragraph 10) – this information is provided in support of the application,
- (d) the fundamental aim is to create a "Gateway site" which will attract developers who wish to create a high quality business park (paragraph 16) – the proposal is for a high quality business park. ASDA will develop the infrastructure for the first phase and will construct an office building on Plot E,
- (e) there is a clear opportunity on this site to establish well designed statement buildings with imaginative use of materials and landscaping to create a major "Gateway" site to the commercial heart of Bognor Regis (paragraph 18) – this is demonstrated in the Design and Access Statement submitted in support of the application,
- (f) Although the Council accepts that the site may need to be phased, proposals for individual phases will not be approved by the Council without an indicative phasing master plan being agreed (paragraph 19) – an overall illustrative master plan has been discussed with the Council and a phasing programme can be agreed,



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- (g) In the absence of an acceptable solution to resolve possible flood risk issues of the reserved site, the Council will expect any proposal for the allocated site to be accompanied by a full landscaping scheme for the reserve site indicating how the land will be landscaped, protected from development and managed/utilised in connection with the proposed development (paragraph 21) – detailed technical work on flood attenuation works for the remainder of the site has not been undertaken, and therefore it is not yet possible to determine the extent of development that could be achieved on the balance of the site.

- 4.76 The Brief also recognises the commercial constraints of the site in terms of access to the wider regional road network and employment pool.

Planning White Paper

- 4.77 The Planning White Paper – Planning for a Sustainable Future – was published in May 2007 by the Department of Communities and Local Government.
- 4.78 In relation to retail development, it stated that:

"We recognise that there are issues around the practical effect of the current policy requirement on applicants to demonstrate the need for proposals outside town centres, where these are not supported by an up-to-date development plan. This 'need test' has proved in some respects a blunt instrument, and can have the unintended effect of restricting competition and limiting consumer choice. For example, it is possible under current policy for a new retail development on the edge of the town centre to be refused because there is an existing or proposed out-of-town development which meets the identified 'need' even though the new retail development would bring wider benefits and help support the town centre.

In addressing this issue, we have two clear objectives. First, we must support current and prospective town centre investment, which contributes to economic prosperity, and to our social and environmental goals. Simply to remove the 'needs test' could put this at risk. Second, we must ensure that planning promotes competition and consumer choice and does not unduly or disproportionately constrain the market.

We therefore intend to review the current approach in PPS6 to assessing the impact of proposals outside town centres. We will replace the need and impact tests with a new test which has a strong focus on our town centre first policy, and which promotes competition and improves consumer choice avoiding the unintended effects of the current need test.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

We will consult on proposals in Summer 2007 and develop new guidance working with the industry and other important stakeholders. We will also consider how best to address competition considerations in our town centre policies, taking into account the conclusions of the Competition Commission inquiry into the groceries market. We will finalise any changes by Spring 2008" (paragraphs 7.53-7.56)

- 4.79 Although the timetable has slipped, the commitment to removing the 'needs' test remains in place. In its response to comments received on the White Paper, the Department responded that:

"Paragraph 7.55 of the PWP said that the Government intended to review the current approach to assessing the impact of proposals outside town centres, in PPS6 Planning for town centres, by replacing the need and impact tests with a new test.

Most of the general responses to the White Paper objected to the removal of the needs test on the basis that it would weaken town centre policy and this point emerged strongly in the other comments we received on the White Paper. Many of those who made more detailed responses were also opposed change to the existing town centre policy regime, though it was admitted that it was difficult to judge the Government's proposals when they were not yet clarified.

Government response

We recognise there are strongly held stakeholder views about this proposal, both in favour and against. Since publishing the White Paper we have had positive and constructive discussions with key stakeholders about its analysis and conclusions. Many stakeholders remain concerned about the practical effect of removing the need test. However, there is some consensus that, although the need test and our policies have played a significant part in revitalising our town centres, there can be perverse consequences from imposing too rigid and prescriptive national planning policy in this specific context. We believe there is wide agreement that we need a robust approach to assessing the impact of proposals on sites outside town centres that are not identified for such development in development plans – which is responsive to the needs of the market, and also reflects particular local circumstances.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

The Competition Commission's recently published provisional findings of their inquiry into the UK groceries market concluded that the planning system for retail development, and the manner in which it is applied by local planning authorities, acts as a barrier to entry or expansion in a significant number of local markets. The Commission have noted retailer concerns about the need test, rather than any of the other tests in PPS6, being a key barrier to the development of new larger grocery stores in many local areas. We also note that one of remedies which the Commission are considering involves the abolition of one or more of the retail planning policy tests. The Government is considering whether to respond to the Competition Commission's provisional findings. It remains our intention to take forward our White Paper commitment, and to consult on revisions to Planning Policy Statement 6 Planning for Town Centres, in the new year."

- 4.80 This is an important point that is relevant to consideration of this proposal. Although a clear quantitative and qualitative need has been demonstrated for the proposal, even if the Council does not accept this, it should acknowledge the practical effect of its position which is to maintain the dominance of the grocery sector in Bognor Regis by Tesco, and to continue to deny customers adequate choice and competition locally.
- 4.81 By allowing this position to remain unchanged, residents are being denied the choice and competition which is at the heart of PPS6, and are having to visit stores outside of the area at Chichester and Littlehampton to find an alternative to Tesco.
- 4.82 The proposed change in policy seeks to address situations such as Bognor Regis where the unintended consequence of the Council's approach is that competition and choice is denied, and local residents have to leave the area in order to get this. It also allows for Tesco to maintain a dominant position over the local grocery sector.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

5. Main Planning Considerations

- 5.1 This section provides an assessment of the key planning considerations that relate to both the site and the proposed development at Oldlands Farm.
- 5.2 Bearing in mind that the site is allocated for development in a relatively up-to-date development plan, the key considerations that have been identified are:
- (a) the extent to which the development proposal is consistent with the guidance in PPS25 on flooding;
 - (b) the extent to which the proposed employment uses meet the objectives of the development plan;
 - (c) the need for a foodstore in Bognor Regis;
 - (d) whether a site is available, suitable or viable for the proposed use in or on the edge of Bognor Regis town centre; and
 - (e) the effects of the proposed foodstore on centres within the area, in particular Bognor Regis town centre.
- 5.3 These matters are addressed in the following sections of this report.
- 5.4 The Environmental Statement that is submitted in support of the applications addresses a range of other matters, such as the overall sustainability of the proposed development.
- 5.5 The overall accessibility of the location and the transport implications of the proposal are assessed in the Transport Statement prepared by Cottee Transport Planning.

6. Flooding

- 6.1 ASDA commissioned a land drainage and flooding assessment of the proposed development at Oldlands Farm (Chris Dartnell Land Drainage and Flood Defence Consultant). This was commissioned because of the requirement in PPS25 that a planning application should be accompanied by a flood risk assessment that demonstrates how the flood risk from all sources will be managed and the effect of the development on flood risk elsewhere. Additionally, this is a specific requirements of the draft Development Brief relating to Policy Site 6.
- 6.2 The assessment is included within the Environmental Statement that accompanies the planning application submission. It is based on the strategic flood risk assessment (SFRA) undertaken by Capita Symonds for for Arun District Council and the comprehensive flood study of Aldingbourne Rife and Lidsey Rife through Bognor Regis and its surrounding area by WSP Developments.
- 6.3 Specifically, it states and concludes in relation to the first phase of development that:

"Buildings on the proposed business park will have floor levels of at least $1.82 + 0.60 = 2.42$ m AOD so that they will be protected against fluvial flooding from Lidsey Rife to the required standards (reference (2)(a), (4) and (11) above). Comparing site ground levels in (6) above with fluvial flood peak levels in (11) above demonstrates that the access and parking areas of the proposed business park and an ingress and egress route from the developed site will be protected against fluvial flooding from Lidsey Rife to the required standards (reference (2)(b) and (2)(c) above respectively). It also demonstrates that the developed site will not require compensatory fluvial flood storage or conveyance (reference (2)(d) above).

The peak rate of surface water run-off from the site post development will not exceed the peak rate of surface water run-off from the site pre development (i.e. the "greenfield" site). Because the underlying subsoil on the site is not conducive to infiltration as a result of its clay content, the peak rate of surface water run-off from the developed site will be restricted by the provision of flood attenuation storage with an outlet structure that controls the flow passing forward.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

A flood attenuation storage ditch will be located immediately on the development side of the site boundary between where it meets the proposed Bognor Regis northern relief road to the north and the existing ditch to the south-east. Consequently, the top of the far bank of the storage ditch will be at a level of 2.0 m AOD throughout its approximately 300 metres length (reference (6) above). The top of the near bank of the storage ditch will be at a slightly higher level because the ground rises gradually into the site. The outlet control structure will be located where the flood attenuation storage ditch meets the existing ditch in the south-east corner of the site. A vortex flow device, known more commonly by its trade name "hydrobrake", will most probably be used to control the flow through the outlet structure. Although the outlet structure will incorporate a trash screen to minimise the risk of blockage by debris of the flow control device, an emergency overflow will also be included as a safeguard.

The flood attenuation storage ditch will have a trapezoidal cross section with 1:1 side slopes and a bed level of 0.8 m AOD throughout its length. This level corresponds to the bed level in the existing ditch where the storage ditch will connect to it. The bed width of the storage ditch will be substantial, probably 5 metres at least. Subsequent hydrological and hydraulic analyses will establish the required storage capacity and, therefore, the necessary bed width. The water level in the storage ditch at its design capacity will not exceed 1.82 m AOD. This level will also be the threshold for the emergency overflow in the outlet structure. The flood attenuation storage ditch will form a significant wetland wildlife amenity of extensive reedbed habitat.

The peak "greenfield" run-off rate will be limited to 5 litres/second/hectare for the 1 in 100 (1.0%) annual probability (100 year return period) storm of critical duration. This rate has been agreed to by the EA for development proposals within the Aldingbourne Rife catchment in the recent past. The resulting flood attenuation storage requirement for the developed site will be increased by 20% to allow for an increase in peak rainfall intensity due to climate change over the next 50 years. Referring also to (13), (14) and (15) above, this will result in the developed site not increasing the risk of flooding elsewhere (reference (1)(g) and (2)(f) above).

The surface water run-off from the developed site will drain to surface water sewers that will all outfall to the flood attenuation storage ditch. These sewers will adhere to the following hydraulic design criteria:

No surcharging of sewers (i.e. water level not to exceed soffit level) under "free" outfall for 2 year return period storm of duration critical for sewer length.

No flooding out of manholes (i.e. water level not to exceed cover level) under "free" outfall for 30 year return period storm of duration critical for sewer length.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

No flooding out of manholes (i.e. water level not to exceed cover level) under "drowned" outfall level of 1.82 m AOD for 2 year return period storm of duration critical for sewer length.

Conditions (a) and (b) are the design criteria set by the sixth edition of "Sewers for Adoption" published in March 2006 by WRC plc for Water UK. Condition (c) is included as an additional safeguard.

Although the ground levels of the redeveloped site will remain predominantly as existing, any hollows will be filled and humps levelled to produce even grades in all directions. This will minimise the ponding of floodwater within the redeveloped site should ever an exceptionally extreme event result in its flooding, whether from a watercourse, the coast or through the surcharging of adjacent sewers or drains. As an additional precaution to ensuring compliance with the minimum standard of protection to buildings against flooding from sewers and drains (reference (2)(e) above) and to managing the residual flood risk (reference (1)(h) above), the floor levels of proposed buildings will be at least 0.3 metres above the highest ground level around the building. With regard to the residual flood risk, the draft SFRA produced by Capita Symonds gives a flood peak level alongside the development site of 1.19 m AOD from tidal flooding if a breach occurred in the sea defences during a present 1 in 200 (0.5%) annual probability (200 year return period) event.

The developed site will not be at risk of flooding from any other sources than those already addressed (reference (1)(f) above).

The above information, together with the incorporation of the land drainage and flood protection and mitigation measures described above, demonstrate that the proposed business park fully complies with the requirements of PPS 25 and the EA."

- 6.4 Therefore, the flood risk assessment demonstrates that the proposal complies with the requirements of PPS25 and also the Development Brief for Policy Site 6.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

7. Employment uses

- 7.1 This section of the statement assesses the employment uses proposed within the first phase of development on the site and considers the extent to which a business park with foodstore complies with the requirements of Policy Site 6 and general regeneration policies for Bognor Regis.
- 7.2 In order to assess the proposed employment uses, it is necessary to understand how the proposals have evolved.

Evolution of proposals for a business park at Oldlands Farm

- 7.3 The proposals for a business park at Oldlands Farm formed part of the Council's work on the Second Review of the Arun District Local Plan which started in June 1998. Therefore, the ambition for a business park to be developed on Oldlands Farm has been in place for over 9 years. Nothing has changed in relation to this and it remains an important development proposal for the Council.
- 7.4 The land at Oldlands Farm is allocated under Policy Site 5 for commercial development (11.2 hectares) and under Policy Site 6 for a high quality Business Park (11.25 hectares) with land reserved for an extension to the Business Park (11.8 hectares), subject to the resolution of flooding issues. Policy Site 6 advises that the development should accommodate uses generally falling within Class B1 of the Use Classes Order, although uses falling within Classes B2 and B8 will be permitted if they contribute to the regeneration objectives for Bognor Regis and are of a high quality design.
- 7.5 The application proposal seeks permission for a first phase of development of 8.3 hectares with the remaining 11.35 hectares to be developed later. The reason for the differences in the site areas stems from the alignment of the North Bognor Regis Relief Road which has now been fixed, and this results in a slightly smaller net developable area at Oldlands Farm than previously estimated by the Council. Therefore, the correct development area for business uses at Oldlands Farm is 19.65 hectares and not 23.0 hectares.
- 7.6 The Trustees of the Langmead Estate were not in a position to progress the proposals for business park development until the outcome of the public inquiry into the residential aspects of the proposals for Site 6 was known. Planning permission was granted for Site 6 in November 2006 and applications for the first phases of residential development, as well as the North Bognor Regis Relief Road, have been submitted to the Council.
- 7.7 However, during the time that the Trustees were waiting for the outcome of the inquiry, the Trustees realised that with prevailing market conditions, development of a business park was unlikely to be viable. It was at this time that ASDA approached the Trustees with a proposal for an "enabling" retail development that would facilitate the first phase of business park development at Oldlands Farm.
- 7.8 ASDA acquired an interest in part of Oldlands Farm and agreed to work with the Trustees to promote the development of a business park on the remainder of the site, with the first phase of the proposal being on 8.3 hectares of land at the western end of the site in the area assumed to be outside of the flood plain. This has subsequently been verified by the work of Chris Dartnell.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 7.9 ASDA and the Trustees instructed HGP to prepare options for a business park and foodstore development on the site and a number of schemes were proposed. It was ASDA's intention to promote the proposal through the preparation of the Council's Local Development Framework.
- 7.10 However, this changed in March 2008 when ASDA and the Trustees were advised that the Council was considering the compulsory acquisition at the entire Oldlands Farm site, if the landowners did not make significant progress towards submission of proposals for a business park on the site.
- 7.11 In response to this, ASDA met the Council to explain the emerging proposals, and the requirement for the business park to be brought forward alongside alternative uses, in order to make any proposals commercially viable.
- 7.12 One of the main issues identified by the Council at the initial meeting was the need for ASDA to provide evidence of the requirement for enabling development to deliver the business park. ASDA agreed to prepare a viability assessment and in order to test this properly, it needed to finalise proposals for the first phase of development on the business park, and HGP architects prepared a number of schemes.
- 7.13 The evolution of the design process is explained in the Design and Access statement. The scheme has been designed to create an attractive, landscaped high quality environment to rival business parks in the region and ultimately attract major office requirements to Bognor Regis. Two and three storey landmark buildings are situated at the northern entrance to the site and larger prestige buildings, aimed at major occupiers, have been placed at the site's entrance and along the main western and eastern frontages.
- 7.14 Within the first phase of development, the following development plots are proposed:
- (a) Plot A – ASDA store – 2.91 hectares plot area (45%);
 - (b) Plot B – B1/B1a – 0.75 hectares plot area (12%);
 - (c) Plot C – B1/B1a – 1.48 hectares plot area (23%);
 - (d) Plot D – B1/B1a – 0.33 hectares plot area (5%);
 - (e) Plot E – B1/B1a – 0.39 hectares plot area (6%); and
 - (f) Plot F – B1/B1a – 0.62 hectares plot area (9%).
- 7.15 The net developable areas of the plots total some 6.5 hectares with the remaining 1.8 hectares given over to infrastructure in the form of access roads and structural landscaping.
- 7.16 The key consideration is the extent to which the development of Plot A for a foodstore, or some 2.91 hectares or 45% of the net developable land within the first phase, achieves the wider employment objectives of the development plan. HGP estimate that if Plot A was developed for business uses, the total amount of floorspace that could be provided is approximately 31,200 sq m GEA.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Need for enabling development to fund the business park

- 7.17 In response to the Council's request, ASDA commissioned a financial appraisal which was submitted formally to the Council in September 2007 (Oldlands Farm Business Park – Viability Assessment). The assessment was prepared by Drivers Jonas with input from Stiles Harold Williams on the local/sub regional employment market, in particular demand and rents, HGP Architects on building types and accommodation, Christopher Smith Associates on costs, Cottey Consulting on access and parking, and Chris Dartnell on flooding and drainage. A copy of this assessment is attached at Appendix 1 to this statement.
- 7.18 The main findings of the viability assessment, which has not been disputed or challenged by the Council, are that:
- (a) Upfront infrastructure costs of developing a business park – estimated to be approximately £6m – are high,
 - (b) without enabling development that provides and pays for the necessary infrastructure, business park development at Oldlands Farm is not viable for a developer because the projected returns are below those for a developer/financier to commit the necessary equity/debt to purchase and invest in the site.
- 7.19 Therefore, it is proposed that the only way a high quality business park could be delivered at Oldlands Farm is for it to be brought forward alongside some form of enabling development.
- 7.20 The Oldlands Farm Business Park – Viability Assessment, tested the delivery of a high quality business park providing B1/B1a space. Having regard to the Council's wider aspirations for effecting a step change in skill levels in the local economy, we consider it right that the Council use Oldlands Farm as a "gateway" site and as an opportunity to establish a highly accessible high quality business park on the north side of Bognor Regis, that would be attractive to businesses in the wider region, thereby allowing Bognor Regis to compete with other alternative sub-regional business parks.
- 7.21 If Oldlands Farm were developed for B2 or B8 uses we consider this would be a missed opportunity to make this step change in the local economy, and would not support the regeneration objectives for Bognor Regis.

Loss of employment land

- 7.22 It is necessary to consider the extent to which the proposed development would lead to a loss of employment land within the District and therefore undermine objectives in the development plan.
- 7.23 It is important to understand that the allocation of Oldlands Farm for commercial development in the form of a business park has been shown to be a theoretical allocation because the viability assessment has shown that development is not viable. We contend that given the scarcity of public funding, the Council will not acquire the site either by compulsory purchase or private treaty, nor will it develop it out. SEEDA has shown no interest in acquiring or developing the site.
- 7.24 Nor indeed should it. There is a viable proposal to allow the site to be developed for the purpose that it was allocated in the development plan without recourse to the public sector, and it is right and proper that the



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

privately funded development should be pursued where it can be demonstrated that it does not cause harm. ASDA and the Trustees contend that this is the case.

- 7.25 Therefore, the current proposals allow for some 3.6 hectares of employment land to be brought forward which, at present are unlikely to be delivered by the market. Moreover, the application proposals facilitate the potential for a further 11.8 hectares of land to be made available, subject to further investigation into flood risk.
- 7.26 So the proposal will not lead to the loss of employment land, it will in fact facilitate the development of employment land and avoid the sterilisation of up to 23 hectares of employment land.
- 7.27 The total B1 floorspace that could potentially be provided on the site in phase one (19,500 sq m), allowing for Stiles Harold Williams' proposed increase in annual take up rate from a historic rate of circa 850 sq m per annum to a rate of circa 1,400 sq m per annum, would constitute 14 years of supply
- 7.28 Therefore, we consider that the application proposal will facilitate the release of circa 14 years supply of land for high quality B1 floorspace, with the potential for significant additional releases thereafter.

Summary

- 7.29 The application proposal will enable an important development site identified within the Adopted Local Plan, one which has been an objective of the Council for over 9 years, to be realised.
- 7.30 Without enabling development, the business park is unlikely to be developed and up to 23 hectares of identified employment land will not come forward for development.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

8. Need for retail development

- 8.1 This section comprises a quantitative and qualitative assessment of the need for additional retail development within the area.
- 8.2 However, in order to undertake this assessment robustly, it is necessary to have up-to-date information on shopping behaviour patterns and main foodstore provision, so that a robust assessment can be undertaken.
- 8.3 The results of a household survey and review of existing foodstore provision are set out first, with an assessment of quantitative and qualitative need following this.

Household survey

- 8.4 A telephone survey has been undertaken on behalf of ASDA by an independent market research company to provide up-to-date empirical evidence of shopping patterns in the Bognor Regis area.
- 8.5 The survey was carried out in October 2007 by Research and Marketing Plus and comprised a telephone interview of 1,000 households in the catchment area shown on the plan at Appendix 2. The survey area was divided into 9 zones based on wards and was based, in part, on a 15 minute drive time from Bognor Regis town centre.
- 8.6 The survey covered Bognor Regis itself and its catchment area extending to the edge of Littlehampton to the east, and the western edge of Bognor Regis at Pagham. To the north the catchment area takes in a large rural area beyond Fontwell from which some trade may be expected to be attracted to Bognor Regis.
- 8.7 Interviews were carried out with the person in each household who is mainly responsible for food and grocery shopping. Respondents were asked questions regarding their normal food and household grocery shopping destinations, for both main food and for top-up shopping trips, and they were also asked further questions relating to the purchase of a range of non-food/comparison goods.
- 8.8 The results of the household surveys are presented at Appendix 3 to this statement. A summary of the main findings of the survey is set out below.

Principal destination for main food and grocery shopping (Q1)

- 8.9 The survey indicated that Tesco at Shripney Road, Bognor Regis was the most popular store for main food and grocery shopping and used by 45% of all respondents. This was followed by Morrisons at Bognor Regis (15%), and Sainsbury's at Westthamptnett Road, Chichester (12%). Interestingly, 1% of respondents visit the nearest ASDA store at Havant which is some 16 miles away.

Reason for choosing main food store (Q2)

- 8.10 The main reason given by respondents for choosing the store they use for main food and grocery shopping was its convenience to home (52%). Other reasons given were the quality of goods (11%), the range of goods available (10%) as well as the favouring the destination out of habit or personal preference (8%).

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Other destination for main food shopping (Q3)

- 8.11 40% of respondents indicated that they do not have another destination for main food shopping. Other destinations given by respondents included Morrisons at Bognor Regis (14%), Sainsbury's at Chichester (10%) and Tesco at Shripney Road, Bognor Regis (9%).

Frequency of main food and grocery shopping (Q4)

- 8.12 The majority of respondents indicated that they do their main food and grocery shopping once a week (65%) while 16% of respondents undertake their main food and grocery shopping more than once a week.

Origin and destination of main food and grocery shopping (Q5 and Q7)

- 8.13 Most respondents (90%) indicated that they begun their shopping trip at home, 6% start from work while 3% indicated that they had their goods delivered.
- 8.14 The majority of respondents (94%) indicated that they finished their shopping trip at home and 3% indicated that they have their goods delivered.

Mode of transport (Q6)

- 8.15 62% of respondents indicated that they travel by car/van, as the main driver, to do their main food and grocery shopping, while 17% travel as a car/van passenger. 7% of respondents walk and 6% use the bus.

Expenditure (Q8) and proportion spent on weekly main food and grocery shopping (Q9)

- 8.16 The majority of respondents spend between £21-£60 with 12% spending between £31-£40, and 11% spending between the price brackets of £21 - £30, £41-£50 and £51-£60.
- 8.17 19% of respondents indicated they spend 71%-80% of their weekly grocery budget on main food and grocery shopping. 16% spend 91-100% of their budget.

Top-up shopping / destination of top-up food and grocery shopping (Q10 and Q11)

- 8.18 The majority of respondents undertake top up shopping (62%) with 37% indicating that they do not.
- 8.19 A wide range of shops were selected by respondents. The most popular stores were Morrisons in Bognor Regis (14%), Tesco at Shripney Road, Bognor Regis (11%) and various local stores in Bognor Regis (11%).

Reasons for choosing top-up food and grocery shopping (Q12) and frequency of shopping (Q13)

- 8.20 Respondents indicated that they chose the store for convenience to home (62%). Other reasons included the quality of goods (11%) and the range of goods available (7%).
- 8.21 39% of respondents indicated that they undertake top-up food and grocery shopping 2-3 times a week. 37% undertook top-up food and grocery shopping once a week.

Origin and destination of top-up food and grocery shopping (Q14 and Q16)

- 8.22 The majority of respondents indicated that they start their shopping journey from their home (84%). 10% indicated that they start their journey from work.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 8.23 The majority of respondents also indicated that they finish their shopping at home (95%) with only 2% finishing their journey at work.

Expenditure (Q17) on last top-up food and grocery shopping trip

- 8.24 58% of respondents spent £10 or less on their last top-up food and grocery shopping trip, while 24% spent £11- £20.

Destinations for purchase of non-food items (Q21 – Q21j)

- 8.25 Respondents to the survey were asked where they normally conducted a variety of their non-food shopping, divided into 10 categories.

- 8.26 Bognor Regis and Chichester are the most popular destinations for most categories of comparison or non-food goods, and no distinction is made between whether the purchase takes place at a store in a town centre, at a supermarket or at an outlet on a retail park.

- 8.27 The main results to highlight are:

- (a) clothing and footwear – Chichester is the most popular destination (49%), followed by Bognor Regis (32%), Worthing (8%) and Portsmouth (5%)
- (b) books and stationery – Bognor Regis (59%), Chichester (28%), Internet (4%) and Worthing (3%)
- (c) health and beauty electrical appliances – Bognor Regis (52%), Chichester (35%), Littlehampton (4%) and Internet (3%)
- (d) household appliances, such as fridges, washing machines and kettles – Bognor Regis (53%), Chichester (29%), Littlehampton (6%) and Internet (5%)
- (e) TVs, Hi-Fis and home computing equipment – Bognor Regis (43%), Chichester (27%), Internet (11%) and Littlehampton (6%)
- (f) CDs, DVDs and computer games – Bognor Regis (52%), Chichester (30%), Internet (12%) and Littlehampton (4%)
- (g) Cameras and camera equipment – Bognor Regis (41%), Chichester (34%), Internet (12%) and Littlehampton (5%)
- (h) personal care products, such as razors, hairdryers, soap, toothpaste and any other beauty products – Bognor Regis (64%), Chichester (23%), Littlehampton (5%) and Worthing (4%)
- (i) jewellery, watches, handbags, luggage and clocks – Chichester (44%), Bognor Regis (28%), Worthing (8%) and abroad (5%)
- (j) medical goods such as medicines, first aid equipment, glasses and contact lenses – Bognor Regis (68%), Chichester (17%), Worthing (4%) and Barnham (3%)
- (k) mobile phones and phone equipment – Bognor Regis (56%), Chichester (27%) and Internet (5%)

- 8.28 This demonstrates the importance of Bognor Regis across a range of comparison goods sectors, in particular for more general comparison items. For certain higher value and specialist purchases, residents visit other centres or make these purchases using the Internet.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Existing Food Store Provision

Large foodstores within the Study Area

- 8.29 The largest store within the Study Area is the out-of-centre Tesco store on Shripney Road located about a mile to the north of Bognor Regis town centre. It has a net sales area of 4,679 sq m net and carries a full range of products, with separate delicatessen and fish counters. It is open 24 hours a day. It is served by about 618 parking spaces. There is a petrol filling station.
- 8.30 The Morrisons store is the second largest store within Bognor Regis. It is located on the edge of the town centre. It is a constrained store served by a multi-storey car park and has established an important role as a top-up store with a main-food function as well.

Beyond the Study Area

- 8.31 Chichester 8 miles to the north west, and Littlehampton 7 miles to the east are the main alternatives centres to Bognor Regis.
- 8.32 Chichester has a number of food stores. Sainsbury's is the largest (3,924 sq m) located on the eastern edge of the town. There is also a large Tesco store, with 4121 sq m net, on Fishbourne East which is in the western side of Chichester. Within the town centre boundary there is also a Waitrose (1573 sq m) and a Marks and Spencer (836 sq m).
- 8.33 Littlehampton is within the District boundary of Arun. The largest store in Littlehampton is Sainsbury's store at Rustington. Planning permission has been granted to extend the gross floorspace from 5,260 sq m to 6,532 sq m, thereby creating an additional 1,272 sq m net sales area.
- 8.34 The Tesco store located on the western side of the 'built-up area of Littlehampton, nearer to Bognor Regis, is the second largest store in Littlehampton with a net sale area of 3,595 sq m. There is a proposal to extend this store by some 871 sq m.

Other foodstore provision within the Study Area

- 8.35 There are a range of small foodstores within the Study Area. These include:
- (a) Tesco Express stores at Station Road (714 sq m), Aldwick Road (1,442 sq m) and Pagham Road (1,550 sq m);
 - (b) Trading Post (780 sq m) and Alldays (262 sq m) at Barnham;
 - (c) Alldays (70 sq m) at The Parade and at Flansham Lane (116 sq m);
 - (d) Co-op stores at 152/156 Hawthorne Road (718 sq m) and 53 Hawthorn Road (112 sq m), and Rose Green Road (162 sq m); and
 - (e) Lidl, Shripney Road (736 sq m).



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Quantitative need for retail development

- 8.36 We have undertaken a quantitative capacity assessment of the convenience and comparison goods expenditure potential of Bognor Regis' probable catchment area, based upon existing and likely future shopping patterns. We have then gone on to consider the level of new convenience and comparison floorspace that could be supported within the area at various future dates. The retail assessment is provided at Appendix 3.

Methodology

- 8.37 The methodology has involved the following steps:
- (i) Identification of a probable catchment area for Bognor Regis.
 - (ii) Assessment of catchment area resident population at 2006, 2007, 2009, 2011, 2012, 2013 and 2015.
 - (iii) Assessment of residents' convenience and comparison goods average annual expenditure within the area at those dates.
 - (iv) Assessment of convenience and comparison goods floorspace within the catchment area.
 - (v) Assessment of benchmark turnovers for the convenience and comparison goods floorspace within the catchment area.
 - (vi) Assessment of residents' convenience and comparison expenditure that is retained by Bognor Regis and which is lost to competing centres/stores.

- 8.38 All monetary values are constant at 2006 prices.

- 8.39 A design year of 2011 has been used. It is assumed that planning permission would be granted in 2009, the store would open in early 2010, and allowing for trading patterns to be established over a 12 month period, 2011 is a reasonable test date.

Expenditure Capacity Assessment

Study area

- 8.40 In order to commission the household survey, it was necessary to define a study area within which to survey shopping patterns and the quality of foodstore provision. Based on a 15 minute drive time band, which was then adjusted to match ward boundaries so that accurate population and expenditure data could be collated, the derived Study Area is shown on the attached plan at Appendix 2.
- 8.41 The Study Area extends from Pagham in the west, across to Shripney and then northwards to Slindon and then south past Ford to the western boundary of Littlehampton.
- 8.42 This map also usefully shows the location of the main stores outside of Bognor Regis to which trade leaks from the area, mainly to Chichester and Littlehampton, and also the main stores within the Study Area.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Population and Expenditure

- 8.43 Population and retail expenditure data for the Study Area has been provided by Experian. Information was supplied for the base year of 2006 which was then projected forward to various test years.
- 8.44 Table 1 shows the population in the Study Area at the base and design years. Experian estimates that there were 80,428 persons in the area in 2006, growing to 81,273 in 2007 when the household survey was commissioned, and rising still further to 85,095 in 2011.
- 8.45 Table 2a shows convenience goods expenditure per head estimates provided by Experian for each ward within the Study Area. In assessing residents' expenditure, in accordance with standard practice, a deduction has been made to exclude expenditure by 'special forms of trading' (1.7% per annum). We have projected the 2006 per capita convenience goods expenditure figure to 2007 using a growth rate of 1.0% per annum and to the test date of 2011 (and beyond) using a growth rate of 0.8% per annum (source: Experian Retail Planner Briefing Note 5.1).
- 8.46 Table 2b shows the relevant comparison goods expenditure estimates for each ward. Special forms of trading have been excluded at a rate of 6%, and the growth rates for 2006-2007 and 2007-2015 were 6% and 5.3% per annum, respectively (source: Experian Retail Planner Briefing Note 5.1).
- 8.47 In the comparison sector, our analysis has focused on those comparison goods that will be sold from the ASDA store, thereby according with the guidance in PPS6. This has been defined as "core comparison" goods and includes clothing materials and garments, shoes and other footwear, small electrical household appliances, glassware, tableware and household utensils, pharmaceutical products, recording media, games, toys and hobbies, garden, plant and flowers, pet and related products and total books and stationary, total appliances for personal care, and jewellery, clocks and watches.
- 8.48 Available convenience goods expenditure, which is a product of population multiplied by expenditure per head, is shown in Table 3a and available comparison goods expenditure is shown in Table 3b.
- 8.49 Available convenience goods expenditure for the Study Area is forecast to grow by £14.0m between 2006-2011 and growth in comparison goods expenditure over the same period is £55.5m.
- 8.50 These figures illustrate that there is a significant amount of additional convenience and comparison goods expenditure available in the Bognor Regis area.

Turnover of convenience stores in the Study Area and leakage

- 8.51 The next step in the quantitative assessment is to model current patterns of main food and top up shopping within the defined Study Area. Patterns of main food shopping are set out in Table 4a and to this, the levels of available convenience goods expenditure estimated in Table 3a are applied. It is necessary to estimate the proportion of convenience goods expenditure that occurs on a main food shopping trip, and a rate of 75% has been used in accordance with standard practise.
- 8.52 Patterns of top up shopping are set out in Table 4b and the levels of available convenience goods expenditure in Table 3a are also applied to this. It is assumed that top up shopping accounts for 25% of convenience goods expenditure.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 8.53 The results are combined in Table 4c so that it is possible to identify the patterns of convenience goods expenditure by residents of the defined Study Area.
- 8.54 The main things to note from this analysis are that in 2007:
- (a) Tesco at Shripney Road is the dominant store within the area, with a total convenience goods turnover of £48.8m
 - (b) £93.3m of convenience goods expenditure is retained by stores within the area
 - (c) £40.8m leaks to stores outside of the area, in particular to Chichester and Littlehampton, and significantly some £0.5m leaks to the nearest ASDA store at Havant, some 18 miles away
 - (d) Tesco stores within the area account for 56.5% of all convenience goods expenditure and Tesco stores within and beyond the area account for 50.0% of all convenience goods expenditure.
- 8.55 In order for the effect of the new store to be modelled accurately, it is necessary to apply the results of the household survey to the levels of available convenience goods expenditure at 2011. This is set out in Table 4d.
- 8.56 This assumes that the patterns of main food and top up shopping will not change during this period arising from store openings or other changes. The only change that has been identified is the proposed extension of the Tesco store at Littlehampton, however as this change is modest and the Montagu Evans retail study submitted in support of the application shows that the effects will be minimal, we have not made any changes to convenience shopping patterns at 2011 within the area used in this assessment.
- 8.57 The next step is to model the results of core comparison shopping within the area. This is set out in Tables 5 (i) to (xi). This shows the extent to which Bognor Regis is able to attract comparison shopping trips within the different sectors. This forms the basis of the estimates of trade diversion in Section 10.
- 8.58 We have estimated the turnover of all convenience goods floorspace within the area that has been identified, based upon benchmark turnover averages for the particular type of space. This is set out in Table 6 and we have concentrated only on those facilities within the Study Area. We have not assessed the benchmark turnover of stores outside of this area.
- 8.59 The source of the information for foodstores and convenience shops in the town centre is IGD and GOAD. The benchmark turnover/floorspace estimates are based on Retail Rankings information on company average trading figures and Drivers Jonas' assumptions for unlisted retail businesses. Table 6 shows a turnover of the identified convenience goods outlets in the Study Area of £82.9m at 2007.
- 8.60 The estimates of the turnover of comparison goods floorspace in the Study Area is set out in Table 7. This is based on information provided in the Coastal Districts Retail Study (2005) undertaken by DTZ for Arun District Council. The estimate for Bognor Regis was £79.1m in 2005 at 2001 prices. This has been increased by 2.2% per annum in accordance with Experian's estimates and it has been converted to 2006 prices using a factor of 0.88 (source: Experian). The adjusted turnover estimate is

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

£73.49m rising to £80.17m by 2011. The estimates for Chichester town centre, district and local centres and non-town centre in Arun are taken from the Coastal Districts Retail Study and are adjusted in the same way. The estimate of the turnover of the comparison goods floorspace of Tesco is derived using company average turnover data from Retail Rankings and Verdict. It is likely to be an under-estimate as no allowance has been made for this space to be over-trading, which as we consider the convenience floorspace in the store is over-trading, is a cautious assumption.

- 8.61 It is necessary to make allowance for committed retail developments within the Study Area. We have identified three commitments. The first is the proposal for a small amount of retail floorspace to be provided as part of the residential development at Felpham. The total floorspace is 217 sq m which is equivalent to a net sales area of some 152 sq m. We have assumed that it would be developed half for convenience use in the form of a local or neighbourhood store, and the other half would be developed as comparison shops, or most likely a service use. The turnover of this space has been estimated using benchmark turnovers.
- 8.62 The remaining commitments are the proposed retail floorspace in the schemes for the Hothampton and Regis Centre sites in Bognor Regis. Information on the total retail floorspace in these schemes has been provided by the Council. There is no suggestion that these schemes would contain any convenience floorspace and so we have assumed that these would provide comparison stores, probably in the form of larger units to provide the type of accommodation that national retail multiples require, and which is not presently available in Bognor Regis. The total comparison turnover of these schemes is estimated to be just over £24m.
- 8.63 The potential for convenience goods floorspace is shown in Table 9a. This shows that at the test date of 2011, there will be £145.3m of available convenience goods expenditure which includes growth of some £14.0m. Based on the benchmark turnover of all stores within the Study Area of £84.9m, there is some £60.4m of available convenience goods expenditure. Based on the survey results (Table 4d), it is possible to estimate that some £44.3m is leaking to stores at Chichester, Littlehampton and beyond, with some £16.0m of expenditure left over.
- 8.64 This is substantially accounted for by the over-trading of the Tesco store at Shripney Road which we estimate is trading some £13.0m over company average. There is also likely to be some retail sales that have not been accounted for in our surveys, mainly at petrol stations and similar outlets where convenience goods can be purchased, and this will be included within the £3.0m that is left over.
- 8.65 Although it is reasonable to allow for some of this expenditure to continue to leak to stores at Littlehampton and Chichester, it is evident that there is significant potential for additional convenience goods floorspace to be provided at Bognor Regis in a form that will reduce the overtrading of the Tesco store at Shripney Road and stem the leakage of expenditure. This level of expenditure would support a store with a net sales area of around 4,500 sq m.
- 8.66 Within the comparison sector, the growth in available expenditure is significant at £55.0m. Although not all of this would be available to Bognor Regis, it is with noting that DTZ identified that Bognor Regis has a relatively weak market share (paragraph 5.10). This is a reflection of the quality and range of comparison shopping facilities available in Bognor Regis relative

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

to other centres. The proposed developments at Hothampton and The Regis Centre will seek to address this qualitative deficiency.

- 8.67 Therefore, it is evident that there is significant growth in expenditure available to support new comparison goods floorspace in Bognor Regis, and possibly for Bognor Regis's market share of available expenditure to increase.

Qualitative need assessment

- 8.68 As outlined in Section 4, PPS6 advises that need and capacity assessments should take account of qualitative considerations. It states that:

"In assessing the need and capacity for additional retail and leisure development, local planning authorities should place greater weight on quantitative need for additional floorspace for the specific types of retail and leisure developments. However local planning authorities should also take account of qualitative considerations. In deprived areas which lack access to a range of services and facilities, and there will be clear and demonstrable benefits in identifying sites for appropriate development to serve communities in these areas, additional weight should be given to meeting these qualitative considerations."

- 8.69 This section examines the extent to which there is a qualitative need for additional convenience and comparison retail floorspace in Bognor Regis and the extent to which the proposed ASDA store could satisfy the identified need.

- 8.70 PPS6 highlights a range of factors that are capable of being considered part of the qualitative need for additional retail floorspace. Indeed, paragraph 2.35 highlights that a key consideration for a local planning authority is to provide for customer choice by ensuring that:

"An appropriate distribution of locations is achieved, subject to the key objectives of promoting the vitality and viability of town centres and the application of the sequential approach, to improve accessibility for the whole community; and provision is made for a range of sites for shopping, leisure and local services which allow genuine choice to meet the needs of the whole community, particularly the needs of those living in deprived areas."

- 8.71 In this case, ASDA considers there to be a compelling qualitative case for additional convenience retail provision in the Study Area arising from:

- (a) inadequate choice and competition – as noted, Tesco stores account for 56.5% of all convenience shopping expenditure within the Bognor Regis area.
- (b) over-trading – the Tesco store at Shripney Road is over-trading leading to poor shopping facilities for customers within the store.
- (c) leakage of expenditure – in order to have greater choice, variety and competition, as well as not to have to shop at the Tesco store at Shripney Road which is over-trading, there is significant expenditure leakage from the area to stores at Chichester,

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Littlehampton and beyond. This is un-sustainable development and runs contrary to guidance in PPS1 and PPG13.

- 8.72 A new store of an appropriate size and scale would provide the level of choice and competition locally that would challenge Tesco's position and encourage residents not to travel further afield for convenience shopping.
- 8.73 Such a store would also be socially inclusive because by driving down prices, it would provide good quality food to local residents at affordable prices.

Other Material Planning Considerations

- 8.74 In addition to the qualitative retail case, there are other benefits of the proposal which should properly fall to be considered as evidence of qualitative need.

Job Creation

- 8.75 The proposals will lead to the creation of some 1,200 jobs in the business park, 240 jobs in the ASDA store and indirect employment for people working on the maintenance of the landscaping, cleaning the offices and in catering. There will also be jobs created during the construction stages. The jobs created in the business park are explained in the Environmental Statement.
- 8.76 For the newly created retail jobs, ASDA works closely with employment agencies, Job Centres and local people to ensure that recruitment takes place from the local area enabling ASDA to become a local store and an important part of the community.
- 8.77 Various forms of investment in the community take place through the ASDA Foundation that assists charities and voluntary groups that have the support of the customers and colleagues within any particular area.
- 8.78 ASDA is an equal opportunities employer and is committed to developing skills and careers. The company has a comprehensive training programme and the biggest employer share option in the country. It also offers flexible shift patterns and jobs targeted at local people. ASDA was also awarded 'Employer of the Year 2002' by the Times.
- 8.79 All ASDA colleagues follow vocational training schemes that have been approved as the equivalent of National Training Standards. Almost 3 years ago, the ASDA Academy was launched to bring back traditional skills to supermarkets. ASDA has at least one craft trained butcher, baker greengrocer and vintner in every one of its stores. All the training courses are externally accredited by industry leading bodies and provide master crafts people with official recognition for their skills. All training schemes provided colleagues with transferable skills.

Regeneration

- 8.80 As explained in the previous section, the retail store will enable the first phase of the business park to be brought forward and for a speculative office building to be constructed.
- 8.81 This will be a significant boost to the local office market in Bognor Regis and will provide the local economy with high quality office space that will enable the town to compete with other centres, such as Chichester.

PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE

Summary

- 8.82 We have demonstrated that there is a quantitative and qualitative need assessment for the proposed development against those criteria using the guidance in PPS6.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

9. Sequential assessment

9.1 PPS6 requires that where need has been established for additional retail development, it is necessary to apply a sequential approach to the assessment of sites upon which the retail development could take place.

9.2 The general principles of the sequential approach are set out at paragraph 2.44:

"A sequential approach should be applied in selecting appropriate sites for allocation within the centres where identified need is to be met. All options in the centre (including, where necessary, the extension of the centre) should be thoroughly assessed before less central sites are considered for development for main town centre uses. The sequential approach requires that locations are considered in the following order:

first, locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become, available within the development plan document period, taking account of an appropriate scale of development in relation to the role and function of the centre; and then

edge-of-centre locations, with preference given to sites that are or will be well-connected to the centre; and then

out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre.

In considering alternative sites with similar locational characteristics in terms of the sequential approach, and having regard to the strategic objectives for the network and hierarchy of town centres set out in their development plan documents, local planning authorities should give weight to those locations that best serve the needs of deprived areas.

The distance thresholds used in applying the sequential approach and for searching for appropriate sites will differ for different types of development (see Table 2, Annex A)."

9.3 For the purposes of the sequential approach, the town centre is defined normally as the primary shopping area and those secondary frontages which are contiguous and closely related to the primary shopping frontage.

9.4 Paragraph 3.15 of PPS6 explains how the sequential approach should be applied through the development control process. It states that:

"In applying the sequential approach, and considering alternative sites, developers and operators should be able to demonstrate that in seeking to find a site in or on the edge of existing centres they have been flexible about their proposed business model in terms of the following planning considerations:

- the scale of their development;*
- the format of their development;*

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- car parking provision; and

the scope for disaggregation (see paragraphs 3.17–3.18)."

9.5 Additional guidance is provided at paragraphs 3.16 that:

"The purpose of this exercise is to explore the possibility of enabling the development to fit onto more central sites by reducing the footprint of the proposal. In seeking to demonstrate flexibility under Paragraph 3.15 above, developers and operators should consider, in terms of scale: reducing the floorspace of the development; in terms of format: more innovative site layouts and store configurations such as multi-storey developments with smaller footprints; and, in terms of car parking: reduced or reconfigured car parking areas.

However, local planning authorities should be realistic in considering whether sites are suitable, viable and available (see paragraph 3.19). Local planning authorities should take into account any genuine difficulties, which the applicant can demonstrate are likely to occur in operating the applicant's business model from the sequentially preferable site, in terms of scale, format, car parking provision and the scope for disaggregation, such as where a retailer would be required to provide a significantly reduced range of products.

However, it will not be sufficient for an applicant to claim merely that the class of goods proposed to be sold cannot be sold from the town centre."

9.6 The criteria by which sites should be assessed is set out at paragraph 3.19:

Where it is argued that otherwise sequentially-preferable sites are not appropriate for the particular development proposed, applicants should provide clear evidence to demonstrate why such sites are not practicable alternatives in terms of:

- Availability: the sites are unavailable now and are unlikely to become available for development within a reasonable period of time (determined on the merits of a particular case). Where such sites become available unexpectedly after receipt of the application the local planning authority should take this into account in their assessment of the application; and

- Suitability: with due regard to the requirements to demonstrate flexibility (paragraphs 3.15–3.18), the sites are not suitable for the type of development proposed; and

- Viability: the development would not be viable on these sites.

9.7 There are two important points in relation to this assessment. First, as the site at Oldlands Farm is "out-of-centre", it is necessary to apply the sequential approach to assess whether a site is available, suitable or viable to meet the identified 'need' in Bognor Regis town centre or on the edge of it.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 9.8 Second, it is important to emphasise that the need in Bognor is for a modern foodstore that can provide effective competition to the existing Tesco store at Shripney Road, and to the various stores at Chichester (Tesco, Sainsbury's and Waitrose) that draw residents' expenditure away from Bognor Regis. A small foodstore or a discount foodstore would not achieve this.

Town centre sites

- 9.9 Based on the narrow definition of town centre contained in PPS6, there are no sites within Bognor Regis that are suitable, available or viable for development of an appropriate sized foodstore.
- 9.10 All of the vacant units are too small to accommodate a foodstore of the size needed.

Edge of centre sites

- 9.11 We have identified a number of sites within or on the edge of Bognor town centre and have assessed each of these to understand whether these satisfy the key tests of suitability, availability and viability for food retail development, of a scale and type to meet the identified need. A location plan and individual plans of each of the sites are included in Appendix 4.

(a) Hothampton Site

- 9.12 The Hothampton Site (identified as the Healthy Living site within the Bognor Regis Masterplan) lies to the west of the main shopping area. It extends to 0.4 hectares (1.1 acres).
- 9.13 Arun District Council has selected St Modwen as development partner to bring forward proposals for the creation of a new civic, retail and residential hub for Bognor Regis. St Modwen will develop the Hothampton Site and also the Regis Centre (see b) below).
- 9.14 The emerging design for the Hothampton site seeks to create a sense of place and community, achieved by bringing together community facilities, vibrant architecture and public open spaces.
- 9.15 The total retail floorspace proposed within the scheme is 3,225 sq m (gross internal). This forms part of the commercial space proposed within the development which will be served by 140 parking spaces.
- 9.16 Although theoretically large enough to accommodate a foodstore, this site has never been promoted by the Council or is advisors as an opportunity to enhance convenience retailing within Bognor Regis.
- 9.17 In order to understand how the site should be developed, it is necessary to review the Bognor Regis Masterplan Planning Policy Guidance which identified this site for *"prestigious office, healthcare and library development to the northern edge of the site will complement the landmark residential developments"* with *"retail units on the ground floor fronting onto Queensway"*.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

9.18 DTZ advised the Council that:

The site offers the potential to provide a comprehensive mixed-use scheme that will provide a catalyst for further regeneration of the town centre area by improving both the residential and commercial offer currently on the market.

There is also the opportunity to create a 'destination' type retail development (a development that could draw from a wider catchment area). This could be achieved through incorporating larger retail units towards the north western boundary of the site which benefits from good frontage and can be readily accessed and serviced.

A new retail led scheme would have to be procured in an appropriate way to ensure that the proposed development attracts the appropriate occupiers that do not conflict with the existing town centre occupiers and mix of uses as part of the wider redevelopment proposals. (page 6)

9.19 The form of retail development that DTZ identified as being suitable for the site – larger retail units – would address the qualitative deficiencies in the comparison retailing sector in the town centre. DTZ had identified that the town centre does not contain units of sufficient size and quality to attract national retail multiples, which together with the lack of a modern covered shopping centre, resulted in Bognor Regis struggling to draw customers to the town centre for comparison shopping.

9.20 Hence DTZ identified the Hothampton site as being suitable for development of units of an appropriate scale and quality to attract these retailers, and this formed the basis of the proposals for the redevelopment of the site.

9.21 Moreover, the identified need for Bognor Regis is for a foodstore with a net sales area of around 4,500 sq m to compete with the Tesco store at Shripney Road and at other centres. This is larger than the total amount of retail floorspace proposed for the Hothampton site. Even if all of the retail floorspace was reserved for a foodstore – and we suggest this would be the wrong approach for this site which is needed for comparison retail development – this site would not be large enough to meet the identified convenience need.

9.22 Also, in order for a foodstore to compete effectively with the Tesco at Shripney Road and other stores at other centres, an appropriate amount of car parking will be needed. However, only 140 spaces is proposed to be available for the foodstore, and yet in order to compete effectively, a store of this size would need around 540 spaces to meet the parking standards in PPG13. Not providing this level of car parking would lead to the store not providing the effective competition and choice needed to compete with Tesco at Shripney Road and reduce leakage.

9.23 Therefore, we consider the site is not suitable for the proposed use because it is being reserved to meet a separate identified need and is too small to meet the identified need for a foodstore.

9.24 This would not prevent a small foodstore use, such as Tesco Express, Sainsbury's Local or Marks and Spencer Simply Food, from opening within the scheme. The capacity analysis shows that there is considerable capacity for convenience goods retail development within Bognor Regis, and even though a smaller outlet would not compete with the Tesco at

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Shripney Road or reduce leakage, it could be accommodated within Bognor Regis as part of this scheme.

(b) The Regis Centre

- 9.25 This site extends to a total of 1.3 hectares (3.2 acres). It comprises a large car park area, Council offices on the north east corner, a theatre to the west boundary and an area of landscaping towards the sea front.
- 9.26 This is an edge of centre site with relatively poor direct linkages to the town centre as it is not visible from the primary shopping area and desire lines are poor. It is questionable whether retail development on this site would achieve the linkages and connections sought from edge of centre sites.
- 9.27 This is reflected in the broad mix of uses that are proposed for the site and the Council's identification of this as a "leisure" site.
- 9.28 Again, it is useful to review the original proposals for this site. DTZ advised the Council that:

Given the location of this site, we feel that it would be suitable for residential redevelopment with ground floor retail and commercial accommodation which will offer a complementary mix of uses.

The retail element should be focussed towards the front of the site, with supporting commercial/professional accommodation fronting Chapel Street. The residential accommodation should be situated directly above and towards the rear of the site fronting the existing car park area.

The quantum of ground floor uses should be sufficient enough to be economically feasible and be designed to accommodate any potential change in use in the future i.e. for conversion back to residential or other active ground floor uses. The current proposals for three retail units fronting Chapel Street would seek to attract specialist/niche retailers or professional services occupiers. This is because the Chapel Street area is currently considered to be peripheral with a low amount of passing trade. (page 9)

- 9.29 An Entertainment Provision Study (2005) commissioned by Arun District Council established that there is a viable demand for a mixed use facility incorporating boutique shops (paragraph 2.10). There is no suggestion the site is suitable for a foodstore.
- 9.30 In response to this, the Council's initial proposals for the site allow for 2,625 sq m net of retail space with 5 kiosks served by a total of 300 parking space. These spaces are to be shared with the arts centre, cinema, hotel, bingo hall and bowling alley.
- 9.31 As with the Hothampton site, this site is considered to be too small for a foodstore of the size needed, and the level of car parking is too low.
- 9.32 Therefore, we consider the site is not suitable for the proposed use because it is being reserved to meet a separate identified need and is too small to meet the identified need for a foodstore.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

(c) Sudley Street car park

- 9.33 This site adjoins the primary shopping area, lying on the north side. It extends to a total of 0.21 hectares. It is currently in use as private car parks.
- 9.34 Commercial properties lie to the east, south and west, and terraced housing lies opposite on the north side. Access will have to be from Sudley Street and there are likely to be significant amenity issues for residents associated with servicing a retail store on this site.
- 9.35 Access from this site to the town centre is not good, via a narrow through route to the main shopping area (London Road). This route would have to be improved. There would be no visual link with the town centre unless buildings were acquired and a link created, but given the short distance involved, we consider that reasonable desire lines could be achieved.
- 9.36 The site is small and the maximum size of store that could be accommodated is estimated to be some 1,000 sq m gross. This assumes that no car parking could be provided. The nearest car park is some distance away, meaning the site would not cater for bulk food shopping trips which is what Bognor Regis needs.
- 9.37 We have concluded the site is too small, hence it is not suitable for a full range foodstore. The loss of a private car park is likely also to be an issue.

(d) W Jones garages

- 9.38 These premises lie to the south west of the town centre, and together form the garages of W Jones. Both sites are away from the prime shopping area, there is no visual linkage with the centre and desire lines are poor.
- 9.39 The smaller premises extends to some 69 sq m, and the larger to 97 sq m. We consider that either could be redeveloped in isolation for foodstore use, but these would be small units without any car parking. Both of these are too small and would do nothing to meet the identified need.

(e) Morrisons car park

- 9.40 This site adjoins the primary shopping area, lying on the west side. It extends to a total of 0.80 hectares. It currently comprises a Morrisons store, multi-storey car park and surface level car park.
- 9.41 Access to the town centre is good, via Bedford Street. The visual connection with the centre is limited, but desire lines are good.
- 9.42 The site is medium-sized and the maximum size of store that could be accommodated is estimated to be some 5,000 sqm gross: much larger than the existing store. This assumes that car parking would continue to be provided because this is the most important car park in the town centre.
- 9.43 This site is proposed for redevelopment in the masterplan for Bognor Town Centre to form the basis of the 'retail quarter' (Zone 2). In the masterplan, it is explained that *"it is significant that no reference is made to the opportunity to redevelop Safeway or provide an enhanced foodstore on this site. We assume this means the Council does not consider this a suitable site for enhanced food retail provision."*
- 9.44 We have concluded the site is too small, hence it is not suitable for a foodstore of the type needed to stem the leakage of trade from the centre. If this type of store could meet the identified need, it would have done so already.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

(f) Land adjoining railway station

9.45 This site extends to some 1.4 hectares. It lies approximately 150 metres from the edge of the primary shopping centre. Having regard to the compact shopping area in Bognor, the lack of sight and desire lines, plus the road network, we consider this site is effectively out-of-centre. Therefore, in sequential terms we do not consider this to be preferable to the application site.

9.46 Moreover, this site is identified in the masterplan as an area for 'urban living' (Zone 4) in the town centre, with high density sustainable residential development expected to be the main land use.

(g) Builders yard, London Road

9.47 This site extends to some 0.21 hectares and is too small. As with the site adjoining the railway station, it is some 200 metres from the edge of the primary shopping centre, hence it is even further away. This remoteness, the lack of sight and desire lines, plus the road network, means that we consider this site is effectively out-of-centre.

9.48 As with the previous site, this land lies within the 'urban living' zone and residential is the preferred land use for this site.

Summary

9.49 We have identified a total of seven sites within or potentially on the edge of Bognor town centre.

9.50 We are satisfied that five of the edge-of-centre sites do not pass the sequential tests of suitability, viability and availability, and a further two are actually out-of-centre. Hence we consider it is reasonable to promote land at Oldlands Farm for retail development to meet the identified need for a foodstore in Bognor Regis.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

10. Effect of the proposed foodstore

- 10.1 The purpose of this section is to estimate the likely effect of the proposal on the vitality and viability of Bognor Regis Town Centre.
- 10.2 In order to understand the potential effects of the proposed ASDA store on the centre, it is necessary to understand the health of the centre. We have undertaken a health check of the centre. This is set out below and the assessment of trade diversion follows this.

Health check of Bognor Regis town centre

- 10.3 This section considers the vitality and viability of Bognor Regis. This is necessary in order to understand the practical effects of any trade diversion from the centre to the proposed ASDA store.
- 10.4 The health check uses those indicators of vitality and viability set out in paragraph 4.4 of PPS6 to analyse the health of the centre. These include, where available:
- diversity of main town centre uses (by number, type and amount of floorspace);
 - the amount of retail, leisure and office floorspace in edge-of-centre and out-of centre locations;
 - the potential capacity for growth or change of centres in the network;
 - retailer representation and intentions to change representation;
 - shopping rents;
 - proportion of vacant street level property;
 - commercial yields on non-domestic property (i.e. the capital value in relation to the expected market rental);
 - pedestrian flows (footfall);
 - accessibility;
 - customer and residents' views and behaviour;
 - perception of safety and occurrence of crime; and
 - state of the town centre environmental quality.

- 10.5 It is relevant to note that a detailed assessment of the health of Bognor Regis, as well as surrounding centres, was undertaken in September 2005 by DTZ on behalf of Arun and Chichester District and Worthing Borough Councils. On the basis that the report is relatively recent and there have been no significant changes in retail provision affecting Bognor Regis, it is considered that it is reasonable to rely upon its findings which were that:

Bognor Regis is a popular tourist and visitor destination characterised by its attractive seafront. Bognor Regis town centre has half the provision of retail and service floorspace (c.58,000 sq.m) than Chichester and almost three times less than for Worthing. It has a total of 324 outlets.

Bognor Regis is ranked 329th in the national rankings and has fallen 52 places since 2001.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

In terms of floorspace, Bognor Regis has a more limited comparison goods offer than either Worthing or Chichester. It does not have any managed or covered shopping centres or department stores. There is also a limited supply of large modern shop units. Littlewoods and Woolworths are the only major variety stores represented in the centre. Bognor Regis has a relatively weak share of clothing and fashion shopping in its core zone with 22% leakage to Worthing and 21% attributed to Chichester.

Overall, Bognor Regis has an under-provision of quality cafes and restaurants. There are no branded operators within the town centre.

Bognor Regis has an equal second representation (50%) of service business (with Littlehampton) out of all the Coastal centres, but its tourist and leisure offer is in need of being updated. (paragraphs 5.79-5.83)

- 10.6 An updated health check analysis of Bognor Regis town centre is set out below.

Diversity of Use

- 10.7 Bognor Regis is the major retail centre in the District. The total floorspace and mix of units is shown in the tables below:

Sector	Floorspace (sq m gross)	Floorspace (%)	National Average (%)
Convenience	6,215	14.91	16.84
Comparison	21,525	51.65	51.27
Services	11,919	28.60	21.64
Other	787	1.89	1.13
Vacant	1,226	2.94	9.12

Sector	Units (total)	Floorspace (%)	National Average (%)
Convenience	15	5.91	9.25
Comparison	124	48.82	45.36
Services	93	36.61	33.27
Other	8	3.15	1.32
Vacant	14	5.51	10.81

Source : Taken from Experian GOAD (Survey September 2006)

- 10.8 With reference to the national average, it is evident that Bognor Regis performs a role mainly as a comparison centre, with a strong service sector and supporting convenience function.
- 10.9 Bognor Regis does not have a department store and has limited major variety store representation. There is no Marks and Spencer, Argos, BHS or Next outlet. The nearest department store is at Chichester.
- 10.10 The report records a vacancy rate of just over 2.9% of floorspace. This figure is almost a third of the national average and demonstrates the strength of the centre. It is accepted that a level of vacancies or "churn" is essential to the healthy operation of a retail centre as operators grow and

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

change their requirements. This level is often considered to be around 7% of floorspace. A level of vacancies lower than this indicates a pent-up market driven demand for additional space in a centre.

- 10.11 It is useful to highlight the finding of the Coastal Districts Retail Study that:

Bognor Regis does not have any modern covered shopping centres. This contrasts with the scale and quality of the retail offer in Worthing and Chichester, and specifically the significant new investment planned for Portsmouth and Guildford (paragraph 5.13)

and

*Our analysis shows that Bognor Regis town centre has a relative under-provision of **quality** food and drink establishments. We consider that such facilities would help to strengthen the evening economy and underpin the retail offer of some centres by encouraging local residents and visitors alike to spend more time and money in the centres. (paragraph 5.35)*

Amount of retail, leisure and office floorspace in edge of centre and out of centre locations

- 10.12 There are three main retail developments in edge-of-centre or out-of-centre locations in Bognor Regis. The main convenience store is Tesco on Shripney Road about a mile from the town centre.
- 10.13 In terms of comparison stores, there are two retail parks; Arun Retail Park anchored by B&Q with Carpetright and Comet, and the Bognor Regis Retail park anchored by Dreams, Halfords, Matalan and Rosebys.
- 10.14 In terms of leisure provision, the majority is provided in out-of-centre locations. The main sports provision, Arun Leisure Centre, is located on Felpham Way to the north east of the centre. Butlins is located to the east of the town centre on Upper Bognor Road.
- 10.15 As noted, Bognor Regis does not have an established office sector located on business parks or similar estates away from the town centre.

Potential capacity for growth or change

- 10.16 Bognor Regis is a popular place to visit and has a strong tourist trade, largely underpinned by the Butlins holiday village outside the town centre. As noted in the Coastal Districts Retail Study, the stores in the town centre appeal to value shoppers and tourists alike.
- 10.17 The Coastal Districts Retail Study identified the potential for retail and leisure development to take place in the town centre at the Hothampton Site and the Regis Centre on the edge of Bognor Regis town centre (paragraph 8.32).
- 10.18 DTZ recommended that these sites represent sustainable and viable opportunities for new mixed use development. In particular, it is noted that these sites provide units of an appropriate size to meet the requirements of modern retail businesses, in particular national retail multiples.
- 10.19 It is these sites that form the basis of the Council's partnership with St Modwen. We comment further on these sites and the opportunities available in Section 9.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Retailer Representation

- 10.20 This indicator comprises two parts. The first part seeks to reflect the quality of retailing already represented in the centre, and the second part seeks to identify whether this is likely to change as a result of demand from retailers for representation in the centre.
- 10.21 In order to place Bognor Regis within a national and regional retail hierarchy, we have used an independent guide: the Javelin VenueScore (2005). This has replaced the Management Horizons Index which was used in the Coastal Districts Retail Study. The Index ranked Bognor Regis 329th out of 1,671 centres and its position had slipped owing to store closures and a lack of new investment and development.
- 10.22 The VenueScore tables are based on the total number of national non-food or comparison retail multiples located in a centre, and it enables an assessment to be made of the critical mass and market positioning of the centre in the catchment area compared with those elsewhere in the country. Using a system of weighting the analysis reflects the range and quality of national retailers represented in a centre. The table below summarises the national and regional retail hierarchy of local centres and those ranked adjacent to Bognor Regis:

Centre	Ranking 2005	Movement	Classifications (2005)
Brighton	8	Worsening	Major City
Portsmouth	76	Worsening	Regional
Worthing	87	Worsening	Regional
Chichester	114	Worsening	Regional
Bognor Regis	314	Improving	Major District
Littlehampton	605	Improving	Minor District

Source/notes:

1. VenueScore, 2005.
 2. The classifications reflect eight grades of retail centres in the United Kingdom: Major City, Major Regional, Regional, Sub-Regional, Major District, District, Minor District and Local.
- 10.23 Bognor Regis is classified as a Major District Centre that is improving its position. This shows the relative strength of Chichester and the extent to which it provides strong competition to Bognor Regis.
- 10.24 Based on information from the Focus database, in December 2007 there were 31 retailers with an outstanding requirement to locate in Bognor Regis. These include Brantano, Desire, Emporio Furniture, Farmfoods, Formula One Auto, McDonalds, Pets at Home, Poundland, Sussex Bed Centres, TJ Hughes and TK Maxx.
- 10.25 For comparison purposes, at the same time there were 26 outstanding requirements in Littlehampton, 87 in Chichester and 45 in Worthing.
- 10.26 This analysis demonstrates that there is a robust level of demand for new space in Bognor Regis.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Shopping Rents

- 10.27 Rental levels have grown steadily in Bognor Regis over the last six years and this is summarised in the table below:

Prime Zone A Rental Values in Bognor Regis					
June 2001	June 2002	June 2003	June 2004	June 2005	June 2006
55	55	55	60	60	60

Source: Focus Database June 2006

Proportion of Vacant Street Level Property

- 10.28 There are currently 8 vacant outlets in Bognor Regis which is just 3% of the total and is significantly below the national average. This is an indication of the centre's overall vitality and viability.
- 10.29 There are no concentrations of vacancies. The vacant units reflect the normal operation of the retail market and the challenges of trading from peripheral retail streets.
- 10.30 This level and pattern of vacancies is consistent with the findings of the Coastal Districts Retail Study (2005).

Commercial yields on non-domestic property

- 10.31 The table below compares commercial yields in Bognor Regis with neighbouring centres over the past four years:

Centre	April 03	July 04	July 05	July 07	July 2007
Bognor Regis	7.00	7.25	7.50	7.25	7.25
Littlehampton	8.25	8.500	8.75	9.00	8.00
Chichester	5.25	5.25	5.25	5.25	4.75
Worthing	5.75	5.75	5.65	5.75	5.00

Source: Data taken from Valuation Office Property Market Report (July 2007)

- 10.32 Rental yields for Bognor Regis rose slightly from 7% in 2003 to 7.25% in 2007 and contrasts with improving yields in neighbouring centres. As noted by DTZ, this is partially attributable to the relative demand for space in the centre and the quality of retail space that is available.

Accessibility

- 10.33 Bognor Regis is accessible by all modes of transport. The railway station is a short walk from the main Bognor Regis town shopping area and is served by frequent trains on the Southern Railway routes to London, Brighton, Portsmouth and Worthing.
- 10.34 There are a number of bus services that serve Bognor Regis. The 700 travels through Bognor Regis onto Littlehampton and eventually Brighton. The service is provided every half hour on Mondays to Saturdays, and hourly on Sundays.
- 10.35 The number 66/67 route is an hourly service that passes next to the Oldlands Farm site.
- 10.36 There are a number of car parks serving the town centre and are supported by off-street parking around the centre as a whole.

Town Centre Environmental Quality and Pedestrian Flow Levels

- 10.37 Bognor Regis is an attractive town centre and the main shopping street is pedestrianised where levels of pedestrian activity are highest. The town benefits from having a high quality beach and the town centre is close to the beach with good access to it.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 10.38 The seafront is one of the major attractions in Bognor Regis and the beach consistently wins awards for cleanliness, safety and facilities, including a pier (the oldest in Britain), a miniature railway and seasonal bandstand entertainment.

Summary

- 10.39 Bognor Regis town centre is healthy and is performing reasonably well when assessed on a range of indicators.
- 10.40 The comparison offer of the centre could be improved and there are proposals to provide the type of unit to attract comparison and leisure businesses which are identified as being necessary to regenerate Bognor Regis.

Assessment of trade diversion

- 10.41 Table 10 sets out the turnover of the proposed ASDA store based on company average turnover.

- 10.42 As required by PPS6, we have estimated the comparison and convenience turnover of the proposal. We have allowed for 10% of the store's trade to be drawn from outside of the Study Area. This is considered to be robust because residents of the area are travelling to the ASDA store at Havant, and as this will be the only ASDA store for some distance, it is reasonable to assume that some residents outside of the area will visit the new store.

- 10.43 The total turnover of the proposal is estimated to be £54.7m, comprising convenience turnover of £38.1m from inside the area and £4.2m from outside, and comparison turnover of £11.2m from inside and £1.2m from outside.

- 10.44 In Tables 11 and 12, the convenience goods trade diversion from existing stores to the proposed ASDA store is set out. The main points to note are:

- (a) Tesco at Shripney Road would experience a very high level of diversion because it is so close to Oldlands Farm - £24.8m
- (b) Morrisons in Bognor Regis would experience some trade diversion - £2.4m
- (c) Trade lost to the ASDA store at Havant would all be retained - £0.5m
- (d) Significant trade would be clawed back that is leaking to stores at Littlehampton and Chichester (£10.3m).

- 10.45 The estimates of comparison goods trade diversion are set out in Table 13. Given the range of goods sold from the store, the main diversion is estimated to be from:

- (a) Chichester town centre as it is the main destination for higher order comparison shopping - £2.9m
- (b) Tesco at Shripney Road because it is so close to Oldlands Farm - £3.9m
- (c) Trade lost to the ASDA store at Havant would all be retained - £0.5m
- (d) There would be some diversion of trade from Bognor Regis town centre - £1.7m.



**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

- 10.46 The trade diversion in the convenience and comparison sectors are combined in Table 14, in which it is estimated that the combined trade diversion from the town centre is 3.1%.
- 10.47 PPS6 does not, however, restrict consideration of retail effects to purely quantitative matters. Indeed, paragraph 3.22 identifies a number of matters that should be taken into account when assessing impact:
- 10.48 It takes account of the criteria set out at paragraph 3.22 of PPS6:
- the extent to which the development would put at risk the spatial planning strategy for the area and the strategy for a particular centre or network of centres, or alter its role in the hierarchy of centres;
 - the likely effect on future public or private sector investment needed to safeguard the vitality and viability of the centre or centres;
 - the likely impact of the proposed development on trade/turnover and on the vitality and viability of existing centres within the catchment area of the proposed development and, where applicable, on the rural economy (an example of a positive impact might be if development results in clawback expenditure from the surrounding area);
 - changes to the range of services provided by centres that could be affected;
 - likely impact on the number of vacant properties in the primary shopping area;
 - potential changes to the quality, attractiveness, physical condition and character of the centre or centres and to its role in the economic and social life of the community; and
 - the implications of proposed leisure and entertainment uses for the evening and night-time economy of the centre (see also paragraph 2.24).

Spatial Planning Strategy

- 10.49 The proposed ASDA store will assist in delivering the proposals for Site 6. It will not undermine the town centre and will support diversification of the local economy.

Effect on Future Public or Private Investment

- 10.50 The Council has been in discussion with St Modwen for months and it did not deter the company from signing the development agreement to progress the proposal. Also, the Council has been aware of Asda's proposals since March of this year and it has not discouraged public investment in Bognor Regis.

Impact on Trade / Turnover of Centres

- 10.51 The impact on the town centre is modest at 3% and is less than a year's growth in available comparison and convenience goods expenditure. Most of the trade diversion is from out of centre stores.

Range of services provided by centres that could be affected

- 10.52 The analysis above demonstrates that there will be no negative impact on any centre across the study area.
- 10.53 Following on from this, the ASDA store would not lead to a reduction in the range of services provided in any centre.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

Vacant properties

- 10.54 Likewise, it is not considered that there will be any change in vacant property levels in the primary shopping areas of any surrounding centres either as a direct or indirect result of the ASDA proposals.

Quality, attractiveness, physical condition and character of the centre or centres and to its role in the economic and social life of the community

- 10.55 The ASDA proposals will not lead to any change in the character of any allocated centres. Indeed, Bognor Regis is about to undergo significant improvements in the quality of retailing and leisure facilities in the town centre with the Hothampton and Regis Centre proposals.

Retail Effects Summary

- 10.56 This section has demonstrated that ASDA's proposals will not harm Bognor Regis town centre.
- 10.57 This is not surprising given that, as set out above there is a quantitative and qualitative need for the proposals.

Summary

- 10.58 Bognor Regis is trading well and the Morrisons store within the centre is trading well as a destination for main food and top up shopping trips. The constrained nature of the car park means that the full potential of the store is held back.
- 10.59 The Tesco store at Shripney Road is likely to experience the most significant trade diversion to the proposed ASDA store, but as this is an out-of-centre store, this is not relevant and is part of a healthy competitive retail market. We do not expect significant diversion from the Morrisons store in the town centre on the basis that those customers wishing to undertake a bulk food shopping trip, will be shopping at Tesco at Shripney Road or leaving to visit a store at Chichester.
- 10.60 We consider that the store would divert a significant proportion of trade from the stores at Chichester by "clawing back" trade that is currently being lost from the area, because of a lack of choice and competition. All of the Chichester stores are "out-of-centre".
- 10.61 In summary, we do not consider that the proposed development would have a detrimental impact on any town centres within or beyond the area.

**PLANNING AND RETAIL STATEMENT
ASDA STORES LTD AND TRUSTEES OF THE LANGMEAD ESTATE**

11. Summary

- 11.1 Arun District Council has had aspirations for a "high quality" business park development at Policy Site 5 and Site 6 since the early 1980s and Oldlands Farm is allocated for this use in the Adopted Local Plan (2003). Such a proposal is consistent with the Council's wider aspirations for the regeneration of Bognor Regis and to achieve a step-change in employment and earnings within the sub-economy.
- 11.2 There is a pressing need to provide greater choice and competition within the grocery sector serving Bognor Regis and the surrounding area because Tesco dominates the local market with some 56.5% of all convenience expenditure. In total, Tesco stores within and beyond the area capture some 50% of the total available convenience spend.
- 11.3 The application proposals are for a mixed-use employment (Use Class B1, high quality business park comprising up to 19,500 sqm gross floorspace) and retail (Use Class A1 grocery store of up to 4,500 sqm net sales area) scheme, together with parking, new highway and associated servicing, infrastructure and landscaping.
- 11.4 A speculative office unit of 1,100 sq m will be constructed. This will be made available at the same time that the foodstore opens. All of the remaining development plots will be serviced, thereby encouraging businesses to come to Bognor Regis.
- 11.5 The viability analysis that is submitted with the planning application demonstrates that development of a high quality business park by itself is not viable. As funding is not available from the public sector to facilitate this development, some form of enabling development is required to realise an important objective of the development plan.
- 11.6 As noted, there is a compelling quantitative and qualitative need for a new grocery store in Bognor Regis. The quantitative case is the over-trading of the existing Tesco store at Shripney and the significant leakage of expenditure to stores at Chichester and Littlehampton. The qualitative case is to relieve the overtrading of the Tesco store on Shripney Road, stem the leakage of trade away from Bognor Regis and provide the choice and competition which are key objectives of PPS6.
- 11.7 There is not a sequentially preferable site that is suitable, available or viable for the proposed grocery store. St Modwen's proposals for mixed-use regeneration do not make provision for a large foodstore of the scale needed to compete with Tesco at Shripney Road and stem the leakage of trade. It is assumed that a small convenience store might form part of those proposals, however it would be of a scale and carry a smaller range of goods, such that it would not be effective choice and competition to Tesco which dominates convenience shopping in Bognor Regis and its immediate surrounding area.
- 11.8 The proposal will not harm the town centre nor undermine the Council's initiatives for the regeneration of Bognor Regis town centre or any other centre. Most of the impact will fall on the Tesco store which is close to Oldlands Farm and on stores outside of Bognor Regis.
- 11.9 In summary, the proposed development is consistent with the development plan and national planning policy guidance, and is therefore commended to Arun District Council.