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Your ref:
Our ref: Planning/138016/AJB

16 September 2008

Dear Matt

Proposed Asda Superstore at Bognor Regis

Thank you for your instructions to review the 'Planning and Retail Statement' report prepared by Drivers Jonas (DJ) submitted in support of the above planning application, and advise EDAW and Arun District Council on the retail planning issues relating to this application. We have now completed our review, and set out our findings and conclusions in this letter. The application site is out-of-centre in PPS6 terms. We have therefore focused on whether there is a demonstrable quantitative and qualitative need for the proposed development; whether it would have an adverse impact on any town or district centre; and whether or not it would comply with the sequential approach. We therefore set out our findings under these headings. We have not reviewed compliance with the development plan, or local site planning and accessibility issues, because these matters are being considered by EDAW and the Council.

Quantitative Need

In Appendix 3 of their report, DJ set out their quantitative need assessment, based on a catchment area of 9 zones. Zones 1 to 6 cover Bognor Regis and Middleton-on-sea and a small rural area immediately to the north. Zone 7 covers the area between Middleton-on-sea and Littlehampton, and includes the village of Yapton. Zone 8 covers the rural area north of Bognor Regis, including the villages of Westergate, Eastergate, and Barnham, and extends to just north of the A27 road. Zone 9 is to the north of Zone 7, and extends well to the north of the A27 road, across the South Downs. In essence, DJ estimate the growth in convenience and comparison goods expenditure in this catchment area, and compare this with their estimate of sales from the existing and proposed shops and stores to show that there will be sufficient growth in expenditure to support the proposed Asda superstore, thus demonstrating quantitative need for it. These calculations are set out in Tables 1 to 10 of Appendix 3.

For the purposes of their quantitative need forecasts (and for impact assessment), DJ assume a 'design year' of 2011. This is realistic, in view of the need to install new primary infrastructure and construct the first phase of the business park, before the Asda store could open for trading. 2011 would therefore be its first full year of trading. However, DJ also provide forecasts of growth in population and expenditure to 2015, which is misleading because these longer term forecasts have not been used in their capacity assessment. We have therefore considered only DJ's forecasts for 2011.

There are a number of errors and weaknesses in DJ's estimates set out in these tables, the most important of which are as follows:

Catchment area population

1. In Table 1, DJ set out their population forecasts for the 9 catchment zones. These show growth of population of 4,667 (5.80%) between 2006 and 2011. These forecasts are based on extrapolation of previous trends, when the national economy was growing fast, house prices were rapidly rising, and substantial new housebuilding was occurring. However, as a result of the 'credit crunch' and rapidly falling house prices, new housebuilding has all but ceased, and is unlikely to resume on any scale for at least the next year or two. Immigration is now being more tightly controlled, and anecdotal evidence suggests that some workers from eastern Europe are now going home. These factors all suggest that DJ's population growth forecasts may well now be somewhat optimistic, resulting in some over-estimation of growth in catchment area expenditure.

Growth in per capita expenditure

2. In Table 2b, DJ has assumed growth in 'core comparison goods' expenditure (a subset of all comparison goods excluding expenditure on 'bulky goods') per capita of 6% from 2006 to 2007, and 5.3% pa 2007 to 2011. This is much too high a rate of growth over this short term period. Recent strong warnings from the Bank of England and the Chancellor of the Exchequer indicate that the national economy is starting to enter recession, in which there is likely to be a decline in GDP. The 'credit crunch' together with sharply rising fuel and food costs and increased Council Tax are putting considerable strain on domestic budgets. For the next two or three years therefore, it is very unlikely that real growth (i.e. excluding inflation) in per capita expenditure on such comparison goods will be more than 1 or 2% pa at most. Indeed, there may even be a decline. This means that DJ has significantly over-estimated growth in catchment area expenditure on comparison goods.
3. DJ has probably also over-estimated growth in per capita expenditure on convenience goods, in view of the national economic factors referred to above. Thus deep discount food retailers are reporting substantial growth in sales, as shoppers switch to them from more expensive mainstream retailers. Because growth of only 0.8% pa 2007 to 2011 has been assumed by DJ, a more realistic lower level of growth (or quite possibly no growth) would not result in a substantial reduction in forecast catchment area expenditure. However, the economic pressures are currently for lower, rather than higher growth of expenditure on convenience goods than DJ has assumed.

Deduction for expenditure on Special Forms of Trading

4. In preparing the forecasts in Tables 2a and 2b, DJ has not deducted sufficient expenditure to allow for Special Forms of Trading (SFT). This accounts for expenditure other than in retail shops, and includes internet and other on-line shopping, catalogue and mail order retailing, party plan retailing, vending machines, and expenditure on goods bought from temporary market stalls such as Farmers' Markets and other street markets. Of this, internet and other on-line shopping is now the largest component. The reality is that substantially greater deductions should now be made for SFT, than have historically been assumed in such assessments based on past trends. In Table 2a, DJ has deducted only 1.7% for convenience goods. Verdict Research Limited has recently published its report 'UK e-Retail 2008'. In that report they estimate that in 2007, online sales of food and grocery amounted to 3.3% of all retail expenditure on such goods. They forecast that by 2012, this will rise to 10.0%. Some of these sales are delivered from local superstores and included in those stores' sales figures, so should not form part of a deduction for expenditure on SFT. However, this shows that a significantly greater deduction than 1.6% should be made for SFT. We consider that an SFT deduction of at least 5.0% in 2011 is now necessary for convenience goods expenditure, in the light of this recent Verdict data. The effect of making too low a deduction for expenditure on SFT is that DJ has over-estimated the amount of expenditure in the catchment area which will be available to retail shops and stores selling convenience goods.

5. Similarly, in Table 2b for comparison goods, DJ has substantially under-estimated the deduction for SFT. DJ's deduction of 6.0% was based on historic Experian data, which pre-dates most of the more recent rapid growth of internet shopping. Verdict now estimates that in 2007 online shopping (which is only one, albeit the largest component of SFT) accounted for 6.5% of all non-food sales, and that this will rise to 16.1% by 2012. Some of that rise will be at the expense of traditional mail order retailing, but this means that much greater deductions for SFT need to be made than assumed by DJ. We now consider that SFT will be likely to account for at least 14.0% of per capita expenditure on all comparison goods in 2011. DJ's 'core comparison goods' excludes the 'bulky' comparison goods (such as furniture and floorcoverings and DIY goods) which are least purchased via the internet; but includes categories such as recording media, small electrical appliances and books, for which on-line shopping accounts for much higher proportions of total spending on these goods than the averages for all comparison goods stated above. Thus Verdict estimate that on-line shopping for music and video accounted for 30.3% of all retail sales of such goods in 2007, and forecast that this will rise to 60.8% by 2012. For electrical goods, their estimates are 15.1% in 2007, rising to 34.5% by 2012; and for books, 14.3% in 2007 rising to 21.7% in 2012. For DJ's 'core comparison goods' therefore, a significantly higher SFT deduction than 14.0% should be made; and we consider that up to 20.0% would not be unrealistic for 2011 (bearing in mind that SFT also includes other categories of expenditure not in retail shops, in addition to on-line shopping). Again, the effect of using too low a deduction for SFT is that DJ has substantially over-estimated the availability of catchment area expenditure on 'core comparison goods'.

'Benchmark' convenience goods sales

6. In Table 4a, DJ set out the market shares of catchment area main food convenience goods expenditure which each shopping destination attracted in 2007 from each catchment zone, based on the results of their Household Interview Survey. Table 4b sets out equivalent market shares for top-up convenience goods shopping. In Table 4c, DJ calculate the estimated amounts of all convenience goods expenditure attracted to each destination from each zone, and thus the actual sales in each store or location (the 'total' column) in 2007. When these totals in Table 4c are compared with the 'benchmark' convenience goods sales in Table 6, it shows whether the existing foodstores in Bognor Regis are over or under trading compared with the 'benchmark' levels based on estimated company average sales densities. However, for the reasons indicated above, the estimated actual 2007 convenience goods sales are somewhat too high.
7. There are also apparent errors in Table 6, which sets out the estimated convenience goods sales in each foodstore in Bognor Regis in 2007, in particular:
 - According to IGD, Morrisons' net sales area is 2,062 sq m, not 1,998 sq m assumed by DJ.
 - The net sales area for Tesco at Shrimpney Road has been correctly transcribed from the 2007 IGD database, which indicates that this store has a gross floorspace of 6,331 sq m and a net sales area of 4,679 sq m. However, the Valuation Office Agency Rating List valuation of this store shows it as having a gross floorspace of 7,610 sq m (excluding a canopy). This suggests that the store was extended after the IGD data was compiled and that the latter is out-of-date. Applying the IGD net to gross ratio of 74% to the VOA gross floorspace suggests that the net sales area in this store is 5,631 sq m net, not 4,679 sq m net as assumed by DJ.

The 'benchmark' sales levels of both of these stores are therefore higher than estimated by DJ, particularly in the case of Tesco, if all other variables remain unchanged.

8. Some of the 'benchmark' convenience goods sales densities applied by DJ in Table 6 are also incorrect. Based on information published by Verdict Research, we estimate that the convenience goods company average sales density for Morrisons in 2006 was £11,207 per sq m net, not £9,662. For Tesco, it was £13,378 per sq m net, not £13,647. For Iceland it was £5,432 not £5,038; for Lidl, £4,399 not £3,379; and for Co-ops, £6,066 not £5,996. This means that for most of these stores, DJ has under-estimated the 'benchmark' sales density and hence the 'benchmark' sales. For the Tesco superstore, allowing for the larger floor area and lower sales density, we estimate that the 'benchmark' sales in 2007 should be £47.53m, (rather than the £40.29m estimated by DJ). This is very close to DJ's estimate of actual sales in this store in Table 4c of £48.8m, showing that this store is not significantly overtrading. For Morrisons, we estimate 'benchmark' sales of £17.96m (rather than the £15.00m estimated by DJ). Again, this is close to DJ's estimate of actual sales in this store of £19.5m (which is somewhat too high for the reasons indicated above), showing that the Morrisons store is also not significantly overtrading.

Convenience goods capacity assessment

9. The Tesco superstore and Morrisons are the two principal foodstores in Bognor Regis, which together account for the great majority of convenience goods sales in the town. The fact that they are not overtrading means that support for the convenience goods floorspace in a new superstore would have to come from growth in population and expenditure, clawback of expenditure leaking to more distant stores, and impact upon the existing stores in the town sufficient to depress their sales below the 'benchmark' levels. However, growth in total catchment area convenience goods expenditure 2007 to 2011 is forecast by DJ to be only £11.2m (which as we have indicated above is somewhat too high). This is far below the likely convenience goods sales in the proposed Asda superstore, which we estimate would be £43.98m, at the 2006/7 company average sales density of £14,792 per sq m net. Thus not more than 25% of the proposed store's convenience goods sales could come from growth in catchment area expenditure, even if 100% of this could be captured by the store – which would be unlikely. This shows that there is no quantitative need for the scale of new convenience goods floorspace proposed; which would therefore have a substantial adverse impact upon existing foodstores in the town, and to a lesser extent on those in Littlehampton and Chichester.
10. In Table 9(a), DJ summarise their convenience goods capacity assessment. This is based on the preceding tables, which as we have indicated over-estimate the available catchment area expenditure and under-estimate the 'benchmark' sales in the existing shops and stores. DJ identify substantial 'surplus capacity', comprising 'leakage' of expenditure and overtrading of existing stores. However, as we have show, the two principal foodstores are not significantly overtrading. In relation to 'leakage', much of catchment zone 7 is closer to the Tesco and Sainsbury's in Littlehampton than to the proposed Asda site. The expenditure in that zone is not therefore 'leaking' from Bognor Regis, because it is more naturally part of Littlehampton's catchment area than that of Bognor Regis. If it was 'clawed back' by the proposed Asda, it would probably result in increased travel distance for shopping. The same applies to some of the settlements in zone 9. Table 9(a) does not therefore reliably demonstrate capacity for new convenience goods floorspace in Bognor Regis on the scale of the proposed Asda superstore.
11. The £43.98m convenience goods sales which we estimate the proposed Asda would generate is virtually the same as the expenditure leakage of £44.3m which DJ forecast by 2011. It would therefore be necessary for Asda to clawback the great majority of this leakage in order for there to be no adverse impact on the existing shops and stores in Bognor Regis. This would amount to substantial impact upon the existing foodstores in Littlehampton and Chichester. Regarding the latter, it is very likely that shoppers would continue to use those stores, such as to undertake trips linked with visits to Chichester for comparison goods shopping, journeys to work, or for other purposes. It is therefore extremely unlikely that such a degree of clawback would occur. There would therefore be severe impacts on the existing foodstores in Bognor Regis, as DJ's own impact analysis confirms. We discuss this further below. Overall, we conclude that there is no demonstrable need for the scale of new convenience goods floorspace proposed by Asda.

Comparison goods capacity assessment

12. In Table 9(b), DJ set out their estimate of the capacity for new comparison goods floorspace, which indicates growth in 'core comparison goods' expenditure of £58.5m 2007 to 2011. Again as we have shown, this is a substantial over-estimate. We have therefore recalculated the amount of expenditure available in the catchment area and growth to 2011, and set this out in the attached Amended Table 9(b). This shows a small fall in per capita expenditure after allowing for the expected high growth of SFT; and growth in catchment area expenditure on 'core comparison goods' (based on DJ's population growth estimates, which are likely to be somewhat high) of only £4.33m 2007 to 2011. We estimate that at the 2006/7 company average sales density for comparison goods (£7,169 per sq m net), the proposed Asda would generate comparison goods sales of £10.65m. Thus even if the whole of our forecast growth in catchment area 'core comparison goods' expenditure was to be captured by the proposed Asda, which would be very unlikely, this would not be sufficient to support the comparison goods floorspace in the store.
13. In Table 7, DJ identify a large element of leakage from the catchment area. Again, some of this is not really 'leakage' which could realistically be assumed to be clawed back by the proposed Asda. This is because Bognor Regis falls within the comparison goods catchment area of Chichester, which is a higher order centre in the retail hierarchy, and will always continue to attract substantial comparison goods trade from the town.
14. DJ has also not taken any account of the proposed town centre developments in Bognor Regis. Whilst these do not yet have planning permission, they are supported by the development plan, and the Council has appointed a development partner which has entered into a Development Agreement with the Council and is preparing a comprehensive development scheme. No details are yet available of the amount of new retail floorspace which will be in these schemes. However, it is intended to be substantial, and to strengthen the town centre in the sub-regional hierarchy of town centres. The Council's strategy therefore accords with the policies in PPS6 that 'development should be focused in existing centres', and that Councils should be pro-active in achieving it.
15. The proposed town centre developments will rely on growth in population and expenditure for their support, but will also have to achieve a high level of clawback of comparison goods expenditure which is currently attracted to other centres, in particular Chichester. Indeed, such clawback is one of their primary purposes, so as to strengthen Bognor Regis Town Centre and help rebalance the sub-regional hierarchy of centres. If these town centre developments are to proceed once national economic growth resumes, they will need to attract all the growth in comparison goods expenditure which is available, and all the expenditure which realistically could be clawed back by the town centre. If some of this growth and clawback has been absorbed by an out-of-centre Asda, it will be significantly less likely that the town centre developments will be able to proceed, or they will be significantly delayed.

We therefore conclude that when the above errors and weaknesses in DJ's forecasts are corrected, and account is taken of the Council's strategy for new town centre developments in Bognor Regis, there will be no quantitative need for the proposed out-of-centre Asda.

Qualitative Need

DJ set out in Section 8 of their Planning and Retail Statement, a number of reasons why they consider that there is a qualitative need for the proposed Asda superstore, together with some 'other material planning considerations'. We comment on these by reference to the paragraph numbers in DJ's report.

8.71 (a). There are already in Bognor Regis a Tesco superstore, a large Morrisons supermarket, an Iceland frozen foods store, 3 Tesco Express stores, a Lidl deep discount supermarket, 2 Co-op local convenience good stores, and a number of small specialist food shops and local neighbourhood 'corner shops' selling convenience goods. Whilst there is only one superstore, together the existing food shops and stores provide a wide range of consumer choice in a competitive market. There is therefore no strong qualitative need for the proposed Asda on the grounds of consumer choice; and there are potentially other ways of increasing consumer choice which better comply with the sequential approach, as discussed below.

8.71 (b). As we have demonstrated above, the Tesco superstore is not overtrading. There is therefore no qualitative need for the Asda to relieve overtrading in Tesco.

8.71 (c). As indicated above, not all of the expenditure identified by DJ as 'leakage' is in fact that; and of the expenditure which is leakage, not all could realistically be clawed back by Asda. In addition, any potential clawback of expenditure will need to be attracted by the proposed new town centre developments in Bognor Regis, not the proposed out-of-centre Asda, if the former are to proceed in accordance with PPS6 and the Council's strategy.

8.73. The food retail market in and around Bognor Regis is already competitive, with 9 existing identified foodstores in the town, and with food superstores nearby in Chichester and Littlehampton. Competition between Tesco, Morrisons and Lidl in particular in Bognor Regis can be expected to keep prices down. Whilst an Asda would undoubtedly increase competition and further help to keep prices down, we consider that there is no strong qualitative need for the proposed out-of-centre store in this respect.

Job creation. DJ make a number of assertions about the number and type of new jobs which they claim would result from the proposed Asda and business park. However, a substantial proportion of the jobs in the Asda itself can reasonably be expected to be transferred from existing foodstores and other shops, as a result of the high retail impact of Asda. The new jobs in the business park would only occur if it is developed. However, only the first phase is included in the planning application by Asda and is guaranteed to be built (but not guaranteed to be occupied) if planning permission is granted. This would generate far less than the 1,200 jobs claimed by DJ, which are for the whole of the business park if this is ever developed. As we have shown in separate advice on financial viability, it is unlikely that the remainder of the business park would be financially viable, even with installation of infrastructure by Asda, and so these jobs are unlikely to materialise.

Regeneration. The site of the proposed Asda and first phase of the business park is a greenfield site, which is not in need of regeneration. The boost to the office market will only occur if new office

development goes ahead on a significant scale. As we have indicated in our advice on financial viability, this is unlikely, and so the benefits for the local office market have been overstated by DJ.

Overall, we conclude that there is no strong qualitative need for the proposed Asda superstore. We consider that there are other ways of increasing competition between foodstores and consumer choice than developing an out-of-centre superstore, which would better comply with the sequential approach. A more appropriate response would be to locate an additional foodstore in the town centre to help anchor the proposed town centre developments; and/or expand the existing Morrison town centre supermarket to enable it to compete more effectively with the Tesco superstore. In relation to comparison goods, it would be much more in accordance with PPS6 to proceed with the proposed town centre developments than to develop an out-of-centre Asda superstore. Our critique of DJ's retail capacity forecasts shows that the latter would reduce the prospects for the former going ahead. Asda has developed or is developing town centre superstores elsewhere, e.g. in Harlow, Rugby and Halesowen, and there is no reason why they could not do so in Bognor Regis to help anchor the new town centre developments there. This would meet any qualitative need for more competition and consumer choice in a way which accords with the first priority in PPS6.

Retail Impact

DJ's convenience goods retail impact calculation is set out Table 12 in their Appendix 3. This is based on figures carried forward from their previous tables, and so suffers from the errors in those tables described above. Thus, it is based on an over-estimate of catchment area expenditure and underestimates convenience goods sales in the proposed Asda store. It means that DJ's impact assessment is unreliable.

In addition, no evidence is presented by DJ for their assumed distribution of impact between the out-of-centre Tesco superstore and the Morrisons town centre supermarket. DJ has assumed that £24.8m would be diverted from Tesco and only £2.4m from Morrisons. This is clearly unrealistic. Morrisons has a convenience goods sales area of 1,552 sq m net, which DJ estimates generated 2007 sales of £19.5m; whilst we estimate that Tesco has a convenience goods sales area of about 3,604 sq m net (based on the Rating List valuation), which DJ estimates generated 2007 sales of £48.8m. Thus 28.5% of the combined sales attracted by these two stores is attracted by Morrisons and 71.5% by Tesco. Since Morrisons is probably closer to Asda in terms of shoppers' perceptions and price levels than is Tesco, we would expect at least 28.5% of the trade diversion to be from Morrisons, rather than only 8.8% as assumed by DJ. On DJ's sales estimate for Morrisons and assessment of total trade diverted, this would amount to loss of £7.8m and an impact of 37.0% in 2011, rather than the impact of only 11.6% assumed by DJ. We would also expect greater impacts on Iceland and on other town centre convenience goods shops than assumed by DJ.

It is also clear from our analysis of retail capacity for new comparison goods floorspace set out above that the impact on the town centre's comparison goods shops would be significantly greater than DJ has assumed.

Applying the tests for retail impact set out in paragraph 3.22 of PPS6, we consider:

1. The spatial planning strategy for Bognor Regis envisages substantial new town centre development including both convenience and comparison goods floorspace. The Council is being pro-active as required by PPS6 in bringing these to fruition and has appointed a development partner who is working up proposed schemes. Such developments will need all available growth in catchment area expenditure and all realistic clawback of expenditure currently going elsewhere for their support, if they are to go ahead. To decentralise much of this growth and some of the potential clawback to an out-of-centre Asda superstore would put these vital developments at risk, and therefore seriously undermine the Council's spatial planning strategy for the town centre.
2. As indicated, the proposed Asda would be highly likely to prevent or seriously delay the proposed large scale new private sector investment in Bognor Regis town centre.
3. The proposed Asda would undermine the vitality and viability of the town centre to a significant degree, because of its substantial impact on Morrisons, which is the principal 'anchor' store in the town centre.
4. The proposed Asda may well reduce the range of services provided by the town centre. Nationally, the growth in superstores over the last few years has been accompanied by significant decline in small convenience goods shops. We would expect this to happen in Bognor Regis town centre to some extent.
5. It would be unlikely to result in a substantial increase in the number of vacant properties in the primary shopping area, but may increase vacancy in the secondary shopping areas to some degree.
6. It would be unlikely to have a serious adverse effect upon the quality, attractiveness, physical condition and character of the town centre or any other centre, or upon its role in the economic and social life of the community. However, it would be very likely to prevent or seriously delay the much needed planned improvements to the town centre, as indicated above.
7. It would have little or no effect upon the night-time economy of Bognor Regis Town Centre or any other centre.

We therefore consider that the proposed Asda superstore would fail most of the tests for impact set out in PPS6.

The Sequential Approach

DJ state that *'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'* (paragraph 9.7). They then go on to say that this identified need is for a modern foodstore which can provide effective competition to Tesco. However, as we have shown, the quantitative need for new convenience and comparison goods floorspace is much less than forecast by DJ; and the proposed new town centre developments will accommodate this need, particularly for comparison goods. There

is therefore no demonstrable need for a new food/non-food superstore of the size of the proposed Asda. An extended or relocated and enlarged Morrisons within the town centre, or a somewhat smaller town centre format Asda, would therefore be a more appropriate means of meeting realistically identified needs than the proposed out-of-centre superstore.

Because DJ has been seeking a site for a large superstore, in undertaking their sequential approach analysis they have dismissed as being unsuitable some sites which could accommodate a smaller store, or extension to or relocation and expansion of Morrisons. Thus the Morrisons or Hothampton sites could accommodate substantial new convenience and comparison goods floorspace on a scale commensurate with correctly forecast needs – and are planned to do so by means of the proposed new town centre developments. We therefore consider that DJ's sequential approach assessment has been undertaken on the wrong basis, and has failed to consider properly the potential of the Morrisons and Hothampton sites to accommodate substantial new town centre developments comprising both convenience and comparison goods floorspace. In our view, these sites could accommodate realistic forecast needs for the foreseeable future, and are clearly a higher priority than the Asda site under the sequential approach.

Conclusions

There is no demonstrable quantitative need for the scale of new convenience goods floorspace in the proposed Asda superstore. There will be quantitative need for new comparison goods floorspace on a scale large than that represented by Asda. However this need arises only in the town centre by virtue of clawback to the town centre of expenditure currently leaking to other centres, by means of planned new town centre development. There is therefore no quantitative need for the comparison goods floorspace in the proposed out-of-centre Asda superstore.

We consider that there is no demonstrable qualitative need for the proposed Asda superstore in the terms indicated in PPS6.

The proposed Asda superstore would be likely to have a substantial adverse impact on Bognor Regis Town Centre; both directly through trade diversion, and indirectly through preventing or seriously delaying the planned town centre development. It would fail most of the tests for impact set out in PPS6.

The planned town centre developments would be able to accommodate realistic forecast quantitative needs for new retail floorspace; and are higher priority in terms of the sequential approach.

Overall therefore, we conclude that there is a strong retail planning case against the proposed Asda superstore, under national planning policies set out in PPS6. This case against is sufficient to justify refusal of planning permission, and we recommend that planning permission be refused.

I trust that this letter meets your needs, but if you require any clarification or further information, please do not hesitate to contact me.

Yours sincerely

Jonathan Baldock
Director – Head of Retail Planning

For and on behalf of DTZ

Enc: Amended Table 9(b)

16 September 2008

Proposed Asda superstore at Bognor Regis

Amended Table 9(b)

COMPARISON GOODS CAPACITY ASSESSMENT

	2007	2011
Catchment Area Population	81,273	85,059
Per capita 'core comparison goods' expenditure including SFT (Growth @ 2%pa)	£ 2,028	£ 2,195
Less SFT deduction (%)	12	20
Per capita 'core comparison goods' expenditure excluding SFT	£ 1,785	£ 1,756
'Core comparison goods' catchment area expenditure (£m)	145.04	149.38
Growth in catchment area 'core comparison goods' expenditure from 2007 (£m)		4.33

