

Retail Advice Note in Respect of Planning Application Ref: BE/23/14/PL

Warehouse Unit adjacent to McDonalds, Southern Cross Trading Estate, Oldlands Way, Bersted, PO22 9SE

Introduction

1. GL Hearn has been instructed by Arun District Council to provide a review of the retail planning case being made in support of the proposed change of use to retail of a Warehouse Unit on the Southern Cross Trading Estate in Bersted near Bognor Regis. Our instructions from Arun District Council require the following outputs:
 - Review and assessment of the retail evidence submitted to support the planning application in the context of the NPPF and technical guidance; and
 - Recommendations to the Council that can be used to inform the decision making process.
2. This retail advice has been prepared following a review of the planning application documents, with a focus primarily upon the Retail Assessment work, a site visit and a review of relevant policy and retail evidence base documents.
3. Our retail advice to the Council is structured in a similar way to the Retail Statement prepared in support of the application and comprises the following sections:
 - Site and Proposals
 - Relevant Retail Planning Policy
 - Sequential Assessment
 - Retail Impact Review
 - Conclusions

Site and Proposals

4. The planning application (reference BE/23/13/PL) submitted on behalf of Chainridge Limited seeks the change of use from Class B8 (Storage or Distribution) to Class A1 (Shops) including partial demolition. The application includes a Retail Statement (RS) prepared by D2 Planning Limited.
5. The application site comprises a single store warehouse building which is currently vacant and car and lorry parking areas. The site is located at Oldlands Way and Shripney Road within an industrial/trading

estate (Sothorn Cross Trading Estate). In close proximity to the proposal site is a Travis Perkins Builders Merchants, a McDonalds Drive Thru restaurant and the Bognor Regis Retail Park whose occupiers include Matalan, Lidl, Halfords, Benson Beds/Ponden Mill, Dreams, Fitness First and KFC. The proposal site is on the edge of the built up area boundary of Bognor Regis in the Bersted area of the town. The site is out-of-centre; with Bognor Regis the closest designated town centre is located approximately 2.5km drive to the south of the site. In the wider area, there is a range of other out-of-centre retail provision including Sainsbury and Tesco food stores, the Shripney Trade Park with tenants including Topps Tiles and Bathstore and the Arun Retail Park whose tenants include B&Q, Pets at Home and Pizza Hut. We did note on our site visit that there is a vacant unit (former Comet) on the Arun Retail Park.

6. The annotated aerial plan below shows the relationship of the proposal site with these surrounding retail uses.



7. The proposals will provide a retail unit of 2,490sqm gross and the application is seeking an unrestricted A1 Retail use. The submitted retail assessment has considered the retail use of the proposal for the following retailing scenarios:
 - A1 Bulky Goods
 - A1 High Street Goods
 - A1 Convenience (for discount food in part) and Comparison Goods
 - A1 Unrestricted.
8. Whilst there is no retail end user identified as the occupier of the proposed retail unit, the RA refers at paragraph 5.22 to acknowledged interest from Aldi and paragraph 6.3 refers to B&M Retail (mixed retail scenario) and Appendix 9, Table 15b refers to the clothing and footwear retailer Next.

Relevant Retail Planning Policy

9. The retail planning policy that the proposals should be judged against are the Development Plan which comprises primarily the saved policies of the Arun District Local Plan 2003 and national planning policy as set out in the National Planning Policy Framework (NPPF).
10. The relevant saved policies relating to retailing and town centres are:
 - Policy DEV 26 Criteria for Retail Development – a criteria based policy which seeks to maintain the hierarchy of centres in the District.
 - Policy DEV 27 Retail Development Outside the Principal Shopping Areas – a policy setting out criteria to be met by retail proposals outside defined Principal Shopping Areas. The criteria to be considered are impact upon vitality and viability of existing centres; accessibility; provision for pedestrian, cycle and disabled access; demonstrating need and considering alternative sequentially preferable sites. Where permission is to be granted it will be subject to appropriate controls on the range of goods sold, restriction on units size and subdivision.
 - Policy DEV 30 Local and Village Centres – which seeks to restrict change of use from retailing to prevent the loss of local and village shops.
11. These saved policies do have general conformity with national policy criteria and tests on retail development.
12. The saved policies are in the process of being replaced by policies within the Draft Arun Local Plan which has been subject to consultation and a Publication version of the Plan was issued in February 2014. The policies in the Draft Local Plan therefore have some weight.
13. The Draft Local Plan's strategic objective¹ for town and village centres is:

'To create vibrant, attractive, safe and accessible towns and villages that build upon their unique characters to provide a wide range of uses and which are a focus for quality shopping, entertainment, leisure, tourism and cultural activities.'
14. The Draft Local Plans vision for Bognor Regis is:

*A revitalised, diversified town centre fulfilling its potential as a sub-regional centre for shopping and entertainment...*²
15. For Littlehampton, the vision relating to the town centre is to provide:

*An attractive and more competitive town centre with a wider range of attractions for residents and visitors...*³
16. Draft Local Plan policies relating to retailing and town centres are RET SP1 Hierarchy of Centres and RET DM1 Retail Development.

¹ Strategic Objectives, page 17, Arun District Council Local Plan (February Publication Version - 21/02/2014)

² Paragraph 4.12, Arun District Council Local Plan (February Publication Version - 21/02/2014)

³ Paragraph 4.14, Arun District Council Local Plan (February Publication Version - 21/02/2014)

17. Supporting text to Policy RET SP1 dealing with hierarchy and role of centres explains that:

Bognor Regis and Littlehampton both offer a range of financial, shopping and leisure services within their town centres. However, according to Arun's Retail Study both centres are smaller and provide a more limited range of shops and facilities than other centres in West Sussex, notably Worthing and Chichester town centres which are a significant draw on Arun residents. Large numbers of Arun's residents therefore travel outside of the District for shopping, leisure and entertainment. Arun District 2013 Retail Study and other recent retail studies have highlighted weaknesses in the retail offer provided by the two coastal towns, in particular an over-reliance on value retailers, with relatively few higher quality 'premium' retailers. The two towns would therefore benefit from new investment to enable them to provide a wider range of facilities. With regards to convenience goods retailing, the 2013 Retail Study identifies little need for additional provision during the plan period. For comparison goods retailing the Study identifies a modest need for additional provision in Bognor Regis and Littlehampton towards the end of the Plan period.⁴

18. This supporting text also notes the findings of the Council's retail evidence base document which advises that Bognor Regis and Littlehampton have weak retail offer relative to competing centres and both would benefit from new investment. In terms of the need or capacity for additional retailing the Council's Retail Study in 2013 found no need for additional convenience goods shopping floorspace and only modest comparison goods shopping need which comes forward late in the plan period.
19. Policy RET SP1 which is reproduced in full below places a focus upon maintaining the existing hierarchy of centres with Bognor Regis and Littlehampton seen as the main focus for major retail, leisure, commercial, office, tourism, cultural, community and residential development. Focusing these activities within centres will promote economic resilience and vital and viable centres.

⁴ Paragraph 9.1.4, Arun District Council Local Plan (February Publication Version - 21/02/2014)

Policy RET SP1

Hierarchy of centres

The hierarchy of centres in Arun will be maintained by supporting and promoting measures which reinforce their role in meeting community needs and providing a focus for a range of activities including: retail, leisure, commercial, office, tourism, cultural, community and residential development. This range of activities will promote economic resilience for the vitality of our centres.

Town Centres

Bognor Regis and Littlehampton will be the main focus for major retail, leisure, commercial, office, tourism, cultural, community and residential development. The Council will positively welcome developments and initiatives aimed at the sustainable economic growth and social wellbeing of the town centres. Such developments will diversify customer choice, aid economic resilience, improve quality both in design and the range of facilities and enhance competitiveness.

Local Service Centres

Rustington will maintain its existing role as a centre providing a good range of shops serving the local population, together with a range of other services and facilities. The Council will welcome development and initiatives which add cultural, community and leisure diversity to the centre to aid economic resilience and vitality.

Arundel will maintain its existing role as a service centre providing both a range of shops and services for the local population and fulfilling a specialist role as a tourist and visitor destination.

Primary and secondary frontages policy apply to the town centres and large service centres. ⁽¹⁵⁾Town Centre boundaries and frontages are shown on the Policies Map.

The Six Villages area⁽¹⁶⁾

Within the Six Villages area, new retail facilities should take account of the existing population and their needs as well as the needs of the strategic needs of any new development '.

Village and Suburban Centres

Village and suburban centres, including shopping parades and stand alone shops form an important resource for businesses, visitors and residents. The expansion and additional provision of such facilities to a scale appropriate to the existing settlement or the planned expansion of that settlement will be welcomed by the Council provided that it adds to the range and accessibility of goods and services.

Policy Outcomes

- Attraction, retention and improvement of retail centres
- Promotion of economic growth and safeguarded environments

Implementation

- Through Arun District Council partnership working with Parish and Town Councils and developers to promote economic growth and vitality in the centres.

20. With regard to retail development, Policy RET DM1 Retail Development and supporting text in the Publication Version of the Local Plan sets out that all applications for growth in town centre uses need to comply with the provision set out in the National Planning Policy Framework and rather than the default NPPF threshold of 2,500sqm gross floorspace; a lower 1,000sqm threshold is imposed⁵. Additionally, it is advised that Primary Shopping Areas are the defined town centre boundaries of Arun's towns and not just the primary and secondary shopping frontages.
21. Paragraph 9.2.2 of the Draft Local Plan advises that there is no specific provision proposed within the plan for further out of centre retail development in line with the Council's 2013 Retail Study and where such development is proposed the Council will rigorously assess the proposal in accordance with the tests set out in the NPPF.
22. The extract below from Policy RET DM1 confirms this approach and the criteria out of centre retail developments will be assessed against:

3. Retail Development outside the Town Centres and Local Service Centres

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

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

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

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

23. At a national level, the National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. In the introduction to the NPPF, the Government sets out that the NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning applications. With its adoption on 27 March 2012, it replaced all previous national planning policy statements with immediate effect. Therefore, it should have significant weight in the consideration any planning application.
24. The NPPF articulates an overriding 'presumption in favour of sustainable development' (para. 14). In terms of decision-making, this is presumption is to be interpreted as follows:
 - Approving development proposals that accord with the development plan without delay; and

⁵ Paragraph 9.2.1, Arun District Council Local Plan (February Publication Version - 21/02/2014)

- Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies in the Framework indicate development should be restricted.
25. Planning policy on retail and commercial land uses and town centres is covered in paragraphs 23 to 27 of the National Planning Policy Framework (NPPF).
 26. The NPPF requires that proposals which are not within a town centre and not in accordance with the development plan should be subject to the sequential test and provide an impact assessment.
 27. The sequential test requires that alternative more central town centre and edge of centre sites are considered as to their availability and suitability to accommodate the proposed development. The assessment of alternative sequential sites requires flexibility in terms of trading format and operational requirements on the part of both the applicant and the LPA. Disaggregation of floorspace between classes of goods is not expected.
 28. With regard to the requirement for an impact assessment, the NPPF sets out two assessment criteria:
 - the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.
 29. The NPPF also advises that an impact assessment should be provided where a proposal is over a proportionate locally set threshold where one exists or a default floorspace threshold of 2,500sqm gross.
 30. Whilst not a development control requirement within the NPPF, the need or capacity for retail floorspace is relevant to plan making (NPPF paragraph 23). Furthermore, assessing and planning to meet the needs of main town centre uses in full by adopting a town centre first approach is recognised in the Planning Practice Guidance⁶ (PPG) published in March 2014.
 31. In summary national (and local) policy on retailing requires a consideration of:
 - Alternative sequential sites which are suitable, available and viable to accommodate the proposal.
 - where proposals are over a certain size threshold, an assessment of the impact the proposals on the vitality and viability of existing centres, effect on public/private sector investment and impact on consumer choice and trading patterns.

⁶ <http://planningguidance.planningportal.gov.uk/blog/guidance/ensuring-the-vitality-of-town-centres/ensuring-the-vitality-of-town-centres-guidance/>

Sequential Assessment

32. Paragraph 24 of the NPPF sets out the requirements of the sequential test. This seeks to locate retail and other main town centre uses into town centres, then edge of centres sites and only where it is demonstrated that no in or edge of centre sites are suitable or available should out of centre sites be considered. With edge and out of centre sites the NPPF advises that the preference should be for accessible sites which are well connected to the town centre.
33. In undertaking the sequential test, the NPPF advises that applicants and local authorities should demonstrate flexibility on issues such as format and scale.
34. Guidance on the operation of the sequential approach is also provided in the 'Ensuring the vitality of town centres section' of the Planning Practice Guidance (PPG). This reiterates and provides additional advice and clarification on the sequential approach. In particular the PPG clarifies how the sequential test should be used in decision taking. It states that:

It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority should support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test should be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites should be discussed between the developer and local planning authority at the earliest opportunity.

35. With regard to determining whether a proposal complies with the sequential test the PPG advises that regard should be had to the requirement to demonstrate flexibility when considering the suitability of more central sites to accommodate the proposal. It is stated that it is not necessary to demonstrate that potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
36. Paragraph 24 of the NPPF identifies that when considering out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. The sequential analysis provided by D2 does not assess the comparative accessibility of their site and its potential to form links with the town centre, this analysis should be provided.
37. Where there are no suitable sequentially preferable locations, the sequential test is passed.
38. The PPG also confirms in line with the NPPF (Paragraph 27) that where a proposal fails to satisfy the sequential test, it should be refused. Compliance with the sequential and impact tests does not guarantee that permission is granted – local planning authorities will have to consider all material considerations in reaching a decision.
39. Section 7 of the RS provides a sequential assessment to support the proposals.

40. Having visited Bognor Regis town centre and its immediate surroundings, we did not identify any large vacant premises within the town centre that would be suitable or could accommodate the quantum of floorspace being proposed. There are vacant premises within the town centre but these are generally small. The sequential analysis should therefore focus upon the suitability and availability of alternative sites.
41. The point is made (paragraph 7.3 of the RS) that Arun DC have already accepted that there are no alternative sequential sites within or on the edge of Bognor town centre as this was the conclusion reached when considering a retail warehouse proposal at the Bognor Regis Retail Park (Application Reference: BE75/12). This application was for the renewal of an unimplemented planning permission BE/19/07/ which comprised the demolition of the existing buildings and redevelopment to provide a new building for retail use (Class A1 retail). This permission was issued in March 2013.
42. The Bognor Regis Retail Park consent was for a 1,634sqm GIA unit, some 866sqm smaller than these Oldlands Way proposals.
43. In the circumstances, where it has previously been accepted that there are no alternative sequential sites to accommodate a smaller proposal; D2's approach is to consider if there has been any material change in circumstances relating to the sites analysed as part of the Bognor Regis Retail Park application and also to consider any available (vacant in centre premises).
44. We consider that this is a reasonable approach but having discussed alternative sequential sites with the Council, they have advised that Planning Application BE13/61 relating to land at Oldlands Farm, Bognor Regis provides more recent consideration of potential sites for retail development around Bognor Regis town centre.
45. The Oldlands Farm proposals which were granted outline planning consent in March 2014 were subject to detailed retail assessment and the analysis highlighted the potential for the Hothampton car park site in Bognor Regis town centre to have sufficient capacity to accommodate approximately 1,800sqm gross of retail floorspace in a single unit. This level of floorspace whilst smaller than that proposed by Chainridge by around 25% does present the possibility to accommodate a large proportion of the proposal in the town centre. Indeed, the Hothampton car park site could accommodate the Aldi foodstore element (1,533sqm gross) which is one occupier scenario that the D2 RS has considered.
46. We note also that an objection to the Oldlands Farm proposals, made by St Modwen the Council's selected development partner for the Hothampton car park site highlighted that they have expressions of interest in the site from retailers with floorspace requirements in the range 15,000sqft to 18,000sqft and that the developer is confident that this level of floorspace could be incorporated into a mixed use development of the town centre car park site.
47. The advice provided to the Council regarding the Hothampton car park site was that the site was not considered suitable for bulky goods type retailing which requires larger units but that it would be suitable for non-bulky retailing such as clothing and footwear. DPDS who provided the advice to the Council stated:

'In relation to bulky goods retailing it is reasonable to conclude that larger units are required and the policy background indicates that a minimum size condition would be applied.'

48. We consider that the deliberations on the Oldlands Farm application and the conclusions reached on the Hothamton site are very relevant to the consideration of this proposal. Drawing upon this analysis, it is clear that the in centre Hothamton Car Park site could accommodate the proposals for the Aldi foodstore and would also be an appropriate location capable of accommodating non bulky retailing such as clothing and footwear.
49. In conclusion, drawing upon the most recent analysis of alternative sequential sites provided in connection with the Oldlands Farm application we consider that the case put forward in the RS to discount the Hothamton site as a sequentially preferable alternative to the Oldlands Way application site is not robust. We would recommend that Council request the applicants to re-consider the Hothamton site and submit further information on why that site is not suitable or immediately available.

Retail Impact

50. D2 consider the impact that their proposed change of use to A1 retail floorspace will have in Sections 5 and 6 of their RS. Section 5 considers convenience goods impact and comparison goods impact is considered in Section 6. Technical Retail Impact Assessment work considering trade diversion and turnover is provided in Appendix 5 – Convenience Goods and Appendix 9 - Comparison Goods.
51. The NPPF requires the consideration of impact with regard to⁷:
 - *The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the study Area of the proposal; and*
 - *The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five from the time the application is made.*
52. The weight of any impact must be judged significantly adverse to warrant a refusal under the NPPF impact test. Significantly adverse impact is not defined; rather it is for the decision maker to determine what constitutes a significant adverse impact based upon the relevant local circumstances of each case and having regard to national and local policy objectives.
53. The retail impact work provided by D2 has reviewed the impact that the proposals would have against four separate considerations which comprised the previous PPS4 retail impact criteria rather than the current NPPF test. The broad thrust of these considerations is consistent and we do not view this as a deficiency in the work D2 have provided.
54. D2 argue that assessment of retail impact is not necessary for these proposals as they have a gross area of below 2,500sqm which is the threshold set out in the NPPF, there is no adopted locally set threshold and pre-application discussions did not identify a requirement to consider retail impact. Notwithstanding their position, D2 have provided an assessment of impact at the request of the LPA.
55. The work presented is primarily based upon an assessment of the level of trade diversion that the proposals are anticipated to divert from existing town centres and facilities. This is based upon their analysis in Appendices 5 and 9. Explanation of the approach adopted to this quantitative analysis

⁷ Paragraph 26 of the NPPF

draws upon the guidance which was provided in the Practice Guidance on need, impact and the sequential approach (2009) issued by DCLG to accompany previous national planning policy on retail and town centres (PPS4). The Practice Guidance has now been cancelled following the publication of the Planning Practice Guidance (PPG) in March 2014. However, as a guide to those involved in retail planning the now cancelled Practice Guidance does provide useful 'how to' information.

56. We review the main data inputs and methodology of this trade diversion work below.

Quantitative Assessment

57. **Design Year** - the design year adopted is 2017. We consider that it is realistic point in time to assess both the foodstore and comparison goods shopping impact of the change of use proposal as it will allow a period for the proposal in which ever form it is developed to achieve a settled trading pattern.
58. **Population and Expenditure** (Tables 1 and 2, Appendices 5 and 9) – these tables adopt the data used within the Arun District Retail Study 2013 (ADRS) prepared on behalf of the Council. Whilst we are aware that there is more up to date data available, we have no issue with the use of the Council's recently prepared retail evidence base.
59. **Centres' and Stores' Turnover** (Tables 4 to 7, Appendix 5 and Tables 3 to 14 Appendix 9) – D2 have modelled the turnover of existing retail facilities based upon constant 2012 market share proportions and consumer spend potential information within the ADRS. We have no issues with this approach.
60. **Turnover of Proposed Store Scenarios** (Table 8, Appendix 5) – sets out the anticipated turnover of the proposed foodstore. With Aldi as the named occupier, D2 have used a sales density which is said to reflect company average trading performance of that retailer. This approach is appropriate; however the convenience goods floorspace sales density adopted (£4,600/sqm) is in our view low relative to the average trading density for the retailer derived from annual results information analysed by Verdict which indicates a rate of £7,500/sqm on sales floorspace. Our analysis⁸ of this overall trading density derives a convenience goods sales density of £9,465/sqm and £3,194/sqm for comparison goods sales floorspace. We therefore consider that the RS has underestimated the potential turnover of the proposal if occupied by Aldi. The effect of changing the trading density is an increase in the total turnover of the proposed store from £4.84m to £9.15m with the convenience goods turnover being double that assessed in the RS increasing to £8.64m.
61. It should be noted that if the proposal is occupied by an Aldi store, there will be additional retail floorspace which will it is indicated be used for comparison goods retailing. Based upon Aldi having a gross floorspace of 1,533sqm (Table 8, Appendix 5) and the overall gross floorspace of the proposal (2,490sqm) the additional comparison goods floorspace would be 957sqm gross with a sales area of around 700sqm. The RS has not specifically assessed the combined impact of an Aldi foodstore and an additional comparison goods unit. We consider this later in our advice.
62. With regard to occupation of the proposal for comparison goods shopping, the RS explains (paragraph 6.2) that there is no confirmed retailer and assesses the potential turnover and impact on the basis of three potential occupier scenarios comprising:

⁸ Based on company trading information published by Verdict in Grocery Retailing 2013 with adjustment to reflect proportion of convenience and comparison goods sales and VAT.

- Unrestricted open A1 comparison goods floorspace
 - 'Bulky' comparison goods
 - Mixed 'bulky and non-bulky' comparison goods
63. The unrestricted comparison goods is impact tested on the basis of a clothing and footwear retailer (Next) and a sales density of £4,896/sqm and turnover of £9.75m is anticipated (Table 15b, Appendix 9). The sales area is identified as being 1,992sqm which is a sales to gross ratio of 80:20. We consider this is a reasonable assumption for a clothing and footwear retailer occupying a unit in this type of location.
64. The 'bulky' comparison goods turnover is based upon a sales density of £3,000/sqm and provides a turnover estimate of £5.97m (Table 15a, Appendix 9). As with the clothing and footwear scenario the sales to gross ratio is 80:20. We consider that this is a reasonable space utilisation and turnover estimate.
65. The mixed comparison goods scenario is assessed on the basis of the proposal being occupied by B&M trading as a Homestore format. This is considered separately to the trade diversion analysis in Appendix 9. Appendix 11 identifies the anticipated turnover of the B&M store as £6.22m. However the calculations in this Appendix are incomplete.
66. **Trade Draw Assumptions** – Primary Catchment Areas (PCA) are defined for both the food and non-food scenarios. The PCA's are based upon study zones used for the ARSU and the PCA for the non-food proposed use is wider than the foodstore PCA. Whilst we consider that the catchments adopted are quite wide, it is reasonable to expect that some trade will be derived from each of the zones albeit the turnover attracted from the more distant zones will be low. D2 do not provide a breakdown of the proportion or monetary sum of turnover the proposals will draw from each of the zones within the respective PCA's. We consider this is a significant failing as providing a breakdown of turnover attraction on a zone by zone basis provides transparency and traceability to the trade diversion assessment work. D2 have simply identified overall turnover diversion from retail locations and it is therefore not possible to trace the robustness of these calculations by reference to existing zonal market share patterns. Without this detailed trade draw information, it is not possible to comment upon the judgements which sit behind the trade diversion work.
67. Given this concern, and in order to provide our advice to the Council on turnover impact levels we have prepared our own market share based retail impact assessment work. This builds up the trade diversion of the proposal from existing facilities on the basis of the market share tables in the ARSU. Our trade diversion and impact analysis is based upon the market shares of existing stores and facilities and uses a relative weighting process which takes account of proximity, store size and competitiveness with the proposal.
68. Our trade diversion impact analysis is provided in Annex A to this advice and is summarised below.

Convenience Scenario Trade Diversion

69. Whilst we do not consider that the proposal for food retailing (Aldi) have passed the sequential test and therefore should not be allowed we have for completeness provided an assessment of the turnover diversions arising from the use of the premises for an Aldi foodstore. Table 1 at Annex A provides this analysis.

70. In summary, the use of the site for a foodstore would lead to turnover diversion from Bognor Regis town centre of £1.17m (comprising of Iceland, Morrisons, Tesco Express) which compared to a pre diversion turnover in 2017 of £21m gives rise to a diversion impact of 5.6%. This is not a turnover impact which we would conclude to be at a level which could be considered significantly adverse and we observed that the Morrisons store in the town centre was trading well albeit the store is rather compromised.
71. The bulk of the diversion to the proposed foodstore fall upon other out of centre foodstores.
72. Whilst the impact upon the town centre of a foodstore on the proposal site would not in our view be significantly adverse, in the circumstances where the proposal could be accommodated within the town centre, we do not consider that the use of the site for food retailing as proposed should be allowed and a condition should be applied to resist primarily food based retailing.

Comparison Scenario Trade Diversion

73. The trade diversions for the three alternative comparison goods occupation scenarios are set out in Tables 2 to 4 at Annex A and the forecast levels of trade diversion and percentage impact on Bognor Regis town centre are set out in the summary table below.

Diversion and Impact Summary Table – Bognor Regis Town Centre		
Occupier Scenario	Trade Diversion from TC	% Turnover Diversion
Clothing and Footwear (Table 2)	£4.70m	6.9%
Bulky Goods (Table 3)	£1.46m	2.1%
Mixed Goods (Table 4)	£2.72m	4.0%

74. The range of monetary diversions from Bognor town centre arising from the potential comparison goods uses sought for the site give rise to impacts of between 6.9% on clothing and footwear down to 2.1% on bulky goods type retail uses. These impacts are calculated on the 2017 market share based comparison goods turnover of the town centre.
75. Having established what we consider are robust estimates of trade diversion and impact we now turn to consider the implications of the various proposal scenarios against the two strands of the impact test set out in paragraph 26 of the NPPF.

The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the study area of the proposal.

76. The impact of the proposal on existing, committed and planned investment in Bognor Regis town centre is considered in paragraphs 5.25 to 5.28 of the RS regarding foodstore use and paragraphs 6.43 to 6.49, 6.56 and Appendix 11 with regard to comparison goods uses.
77. Much of the commentary in the RS is based upon previous assessment work and decision on retail proposals within Arun District.

78. We have visited Bognor Regis town centre and it is clear that investment is currently being made in the hard landscaping of the primary shopping areas of the town centre, this should improve the overall quality of the town centres environment. We could however find little on the ground evidence of any recent retailer/developer investment within the town centre.
79. St Modwen, the Council's preferred developer for the Regis Centre and Hothampton car park site have recently expressed concern over the impact that the retail element of the out of centre Oldlands Farm development would have upon their prospects to deliver their town centre redevelopment proposals. In particular they highlighted principle concerns relating to business viability and securing tenant interest in their investment and regeneration proposals. St Modwen in particular highlighted concerns over proposals for unrestricted A1 use including food and highlighted demand from retailers for these types of uses being expressed for the Hothampton site. They urged caution as they were concerned that the implementation of the town centre regeneration schemes could be prejudiced by unrestricted out of centre retail development.
80. In approving Oldlands Farm, the Council did impose conditions which restricted the retail uses to specifically exclude clothing and footwear and food retailing.
81. We consider as with the Oldlands farm proposals that unrestricted retail use of these premises at Oldlands Way will have the potential to divert retailer demand away from the town centre which would impact upon the town centre investment and regeneration coming forward on town centre sites.
82. Indeed, the level of trade diversion we forecast to fall upon the town centre should the proposals be operated by a clothing and footwear retailer are around £4.7m and 6% impact, this is a significant withdrawal of turnover directly from existing clothing and footwear stores in Bognor Regis town centre and it will impact upon future investment to maintain and upgrade premises and grow business.
83. We do not however consider that a more restricted form of comparison goods shopping use at Oldlands Way would impact upon the town centre regeneration proposals as there would be limited overlap in terms of goods sold and retailers targeted.

The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made.

84. D2 do not provide their own health check of Bognor Regis town centre, instead they restate the health check conclusions of the ADRSU in section 4 of the RS.
85. This conclusion is not indicative to us of a particularly strong or resilient centre. The town centre is identified as lacking modern retail floorspace and lacking anchor stores, better quality clothing and footwear offer and leisure based facilities. The need to focus new development into the town centre is clearly expressed.
86. Against this town centre vitality and viability context, we have forecast potential trade diversion and impact for clothing and footwear which we consider will be significant particularly when as the ADRSU highlights the current offer is weak.

87. The bulky goods and mixed retail impact forecasts are lower and whilst the impacts will be adverse upon the current health of Bognor Regis town centre we do not consider that the levels of impact associated with these potential occupiers/uses would give rise to significant impacts.

Conclusions

88. Having reviewed the retail aspects of the Chainridge Limited proposals for Oldland Way, we consider that:
1. With regard to the sequential test that the applicant should be asked to submit further information on the suitability and availability of the Hothampton site to accommodate their proposed retail development scenarios having due regard to the requirements for flexibility in assessing alternative site options.
 2. The impact of an unrestricted non-food comparison goods proposal (clothing and footwear scenario) would have a significant impact upon both investment in the town centre and the vitality and viability of the town centre.
 3. Bulky goods and mixed comparison users of the site would not have significant adverse impact upon investment within or the health of the town centre.
89. We would therefore recommend that in order for the Council to be able to fully consider the retail aspects of the application proposals, the applicant should submit further information on why the Hothampton site is not suitable or immediately available.

ANNEX A: GLH TRADE DIVERSION AND IMPACT TABLES

Table 1 - Foodstore (Aldi) Based Proposal Trade Diversion and Impact

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	Zone 10	Zone 11	Zone 12	Zone 13	Zone 14	Zone 15	TOTAL DIVERSION £m	PRE DIVERSION TURNOVER 2017 £m	DIVERSION IMPACT £m	POST DIVERSION IMPACT %
Chainridge Limited - Aldi Proposal																			
% Store Turnover From Zone	10%	30%	30%	10%	10%			10%											
Trade Draw £m	£0.86	£2.59	£2.59	£0.86	£0.86			£0.86								£8.64			
Asda, Ferring, West Worthing	£0.02	£0.10	£0.00	£0.03	£0.02	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.18	£25.20	£25.02	0.7%
Co-op, Arundel	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£4.23	£4.23	0.0%
Co-op, Barnham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.02	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.02	£2.05	£2.03	1.0%
Co-op, Broadmark Lane, Rustington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£3.75	£3.75	0.0%
Co-op, Goring, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£8.90	£8.90	0.0%
Co-op, Hawthorne Road, Bognor Regis	£0.00	£0.00	£0.02	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.03	£2.62	£2.59	1.2%
Co-op, Rose Green Road, Bognor Regis	£0.01	£0.00	£0.07	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.09	£3.78	£3.69	2.3%
Co-op, Wick Street, Littlehampton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.42	£1.42	0.0%
Iceland, Churchill Parade, Rustington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£5.29	£5.29	0.0%
Iceland, Goring Road, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£3.56	£3.56	0.0%
Iceland, Queensway, Bognor Regis	£0.00	£0.01	£0.01	£0.00	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.03	£2.68	£2.64	1.3%
Lidl, Peel Centre, Shipney, Bognor Regis	£0.04	£0.25	£0.12	£0.03	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.44	£3.04	£2.60	14.5%
Lidl, Littlehampton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£1.18	£1.17	0.9%
Marks Spencer, East Street, Chichester	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.03	£2.27	£2.24	1.4%
Morrisons, Bedford Way, Bognor Regis	£0.14	£0.33	£0.34	£0.15	£0.09	£0.00	£0.00	£0.02	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.08	£17.63	£16.55	6.1%
Sainsbury's, Bognor Regis	£0.21	£0.69	£0.79	£0.16	£0.27	£0.00	£0.00	£0.13	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£2.26	£26.26	£24.00	8.6%
Sainsbury's, High Street, Littlehampton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£4.55	£4.55	0.0%
Sainsbury's, Lyon Farm Retail Park, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£15.38	£15.38	0.0%
Sainsbury's, New Road, Rustington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£35.26	£35.26	0.0%
Sainsbury's, Westhamphnett, Chichester	£0.07	£0.03	£0.15	£0.02	£0.01	£0.00	£0.00	£0.25	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.53	£11.47	£10.93	4.7%
Tesco Express, Aldwick Road, Bognor Regis	£0.00	£0.00	£0.02	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.02	£1.50	£1.48	1.4%
Tesco Express, Chichester Road, South Bersted	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.41	£0.41	1.4%
Tesco Express, Felpham Way, Bognor Regis	£0.00	£0.00	£0.00	£0.00	£0.02	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.02	£2.29	£2.27	0.8%
Tesco Express, Pagham Road, Bognor Regis	£0.01	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.02	£1.44	£1.42	1.6%
Tesco Express, Station Road, Bognor Regis	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.35	£0.34	1.7%
Tesco, Broadpiece, Littlehampton	£0.00	£0.00	£0.00	£0.00	£0.24	£0.00	£0.00	£0.16	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.41	£46.73	£46.32	0.9%
Tesco, Fishbourne Road, Chichester	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£2.31	£2.31	0.0%
Tesco, West Durrington, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£60.87	£60.87	0.0%
Tesco, Shipney Road, Bognor Regis	£0.34	£1.12	£1.04	£0.44	£0.19	£0.00	£0.00	£0.23	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£3.36	£39.94	£36.58	8.4%
Tesco, South Street, Chichester	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	0.0%
The Trading Post, Barnham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.77	£0.76	1.0%
Waitrose, Avon Road, Littlehampton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£12.55	£12.55	0.0%
Waitrose, High Street, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£8.96	£8.96	0.0%
Waitrose, Ravenna, Chichester	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£4.04	£4.04	0.0%
Internet/Online	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£14.03	£14.03	0.0%
Aldi, Carlton Terrace, Portslade, Brighton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.07	£0.07	0.0%
Asda, Larchwood Avenue, Bedhampton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.16	£0.16	0.0%
Asda, Speedfields Park, Newgate Lane, Fareham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.05	£0.05	0.0%
Asda, Telford Drive, Cippenham, Slough, Berks	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.17	£0.17	0.0%
Co-op, Fareham Road, Wickham, Fareham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.07	£0.07	0.0%
Co-op, Felpham Way, Felpham, Bognor Regis	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.26	£0.26	0.0%
Co-op, Ferring Street, Ferring	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.15	£1.15	0.0%
Co-op, Main Road, Yapton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.35	£1.35	0.0%
Co-op, Manor Parade, Salvington Road, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.54	£0.54	0.0%
Co-op, Nyetimber Land, Aldwick	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.25	£0.25	0.0%
Co-op, Salvington Road, Durrington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.07	£0.07	0.0%
Co-op, The Boulevard, Nelson Road, Durrington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.54	£0.54	0.0%
Co-op, The Parade, Pagham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.31	£0.30	1.3%
Co-op, The Square, Angmering	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.78	£0.78	0.0%
Iceland, Surrey Street, Littlehampton	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.83	£0.83	0.0%
Lidl, North Street, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.15	£1.15	0.0%
Lidl, Portfield Way, Chichester	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.14	£0.14	0.0%
Marks & Spencer BP, Worthing Road, Rustington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.08	£0.08	0.0%
Marks & Spencer, Montague Street, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.89	£1.89	0.0%
Morrisons, Lakesmere Road, Horndean	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.21	£0.21	0.0%
Morrisons, Newland Street, Worthing	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£7.04	£7.04	0.0%
One Stop, Durlston Drive, Bognor Regis	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.07	£0.07	3.3%
One Stop, Elmer Road, Middleton-on-Sea	£0.00	£0.0																	

Table 2 - Clothing and Footwear Based Proposal Trade Diversion and Impact

Destination	Zone 1 £m	Zone 2 £m	Zone 3 £m	Zone 4 £m	Zone 5 £m	Zone 6 £m	Zone 7 £m	Zone 8 £m	Zone 9 £m	Zone 10 £m	Zone 11 £m	Zone 12 £m	Zone 13 £m	Zone 14 £m	Zone 15 £m	TOTAL DIVERSION £m	PRE DIVERSION	POST DIVERSION	TRADE DIVERSION IMPACT %
																	TURNOVER 2017 £m	IMPACT £m	
Chainridge Limited - Clothing and Footwear Proposal																			
% Turnover From Zone	15%	20%	20%	15%	10%	10%	5%	5%	0%	0%	0%	0%	0%	0%	0%	100%			
Trade Draw £m	£1.32	£1.76	£1.76	£1.32	£0.88	£0.88	£0.44	£0.44	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£8.78			
Arundel	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£2.91	£2.90	0.4%
Bognor Regis Town Centre	£0.69	£1.07	£0.98	£0.82	£0.41	£0.48	£0.11	£0.13	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£4.70	£68.46	£63.76	6.9%
Bognor Regis Other	£0.05	£0.07	£0.07	£0.05	£0.04	£0.03	£0.01	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.34	£30.82	£30.48	1.1%
Littlehampton Town Centre	£0.00	£0.01	£0.00	£0.00	£0.02	£0.03	£0.05	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.13	£25.02	£24.89	0.5%
Littlehampton Other	£0.00	£0.00	£0.00	£0.00	£0.01	£0.02	£0.02	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.07	£22.47	£22.40	0.3%
Rustington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£18.78	£18.77	0.1%
Rustington other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.01	0.0%
Ferring	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£7.03	£7.03	0.0%
Arun Elsewhere	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£1.45	£1.44	0.4%
Chichester City Centre	£0.47	£0.51	£0.61	£0.33	£0.32	£0.21	£0.20	£0.24	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£2.89	£111.06	£108.17	2.6%
Chichester Other	£0.04	£0.02	£0.03	£0.02	£0.02	£0.01	£0.01	£0.03	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.17	£15.75	£15.58	1.1%
Worthing Town Centre	£0.01	£0.01	£0.01	£0.00	£0.03	£0.05	£0.02	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.12	£160.02	£159.90	0.1%
Worthing Other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£41.47	£41.47	0.0%
Holmbush/Shoreham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£8.76	£8.76	0.0%
Brighton	£0.00	£0.01	£0.00	£0.03	£0.00	£0.02	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.07	£17.94	£17.87	0.4%
Portsmouth	£0.05	£0.05	£0.03	£0.05	£0.01	£0.01	£0.01	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.21	£8.28	£8.07	2.5%
Elsewhere	£0.00	£0.01	£0.01	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.04	£24.63	£24.59	0.2%
Internet/Mail Order	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£130.17	£130.17	0.0%
Total	£1.32	£1.76	£1.76	£1.32	£0.88	£0.88	£0.44	£0.44	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£8.78	£695.03	£686.25	1.3%

Table 3 - Bulky Goods Based Proposal Trade Diversion and Impact

Destination	Zone 1 £m	Zone 2 £m	Zone 3 £m	Zone 4 £m	Zone 5 £m	Zone 6 £m	Zone 7 £m	Zone 8 £m	Zone 9 £m	Zone 10 £m	Zone 11 £m	Zone 12 £m	Zone 13 £m	Zone 14 £m	Zone 15 £m	TOTAL DIVERSION £m	PRE DIVERSION	POST DIVERSION	TRADE
																	TURNOVER 2017 £m	IMPACT £m	DIVERSION IMPACT %
Chainridge Limited - Bulky Goods Proposal % Turnover From Zone Trade Draw £m	15% £0.90	20% £1.19	20% £1.19	15% £0.90	10% £0.60	10% £0.60	5% £0.30	5% £0.30	0% £0.00	0% £0.00	0% £0.00	0% £0.00	0% £0.00	0% £0.00	0% £0.00	100% £5.97			
Arundel	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£2.91	£2.90	0.3%
Bognor Regis Town Centre	£0.21	£0.35	£0.31	£0.27	£0.11	£0.15	£0.03	£0.03	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.46	£68.46	£67.00	2.1%
Bognor Regis Other	£0.28	£0.39	£0.40	£0.29	£0.22	£0.19	£0.06	£0.06	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.89	£30.82	£28.93	6.1%
Littlehampton Town Centre	£0.00	£0.01	£0.00	£0.00	£0.01	£0.02	£0.03	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.08	£25.02	£24.94	0.3%
Littlehampton Other	£0.00	£0.00	£0.00	£0.01	£0.02	£0.03	£0.03	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.09	£22.47	£22.38	0.4%
Rustington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£18.78	£18.77	0.1%
Rustington other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.01	0.0%
Ferring	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£7.03	£7.03	0.0%
Arun Elsewhere	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£1.45	£1.44	0.4%
Chichester City Centre	£0.28	£0.34	£0.38	£0.22	£0.17	£0.13	£0.11	£0.13	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.75	£111.06	£109.31	1.6%
Chichester Other	£0.08	£0.05	£0.07	£0.05	£0.04	£0.03	£0.02	£0.05	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.41	£15.75	£15.34	2.6%
Worthing Town Centre	£0.00	£0.01	£0.00	£0.00	£0.01	£0.02	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.05	£160.02	£159.97	0.0%
Worthing Other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£41.47	£41.47	0.0%
Holmbush/Shoreham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£8.76	£8.75	0.1%
Brighton	£0.00	£0.01	£0.00	£0.02	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.05	£17.94	£17.89	0.3%
Portsmouth	£0.03	£0.03	£0.02	£0.03	£0.01	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.13	£8.28	£8.15	1.5%
Elsewhere	£0.00	£0.01	£0.01	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.04	£24.63	£24.59	0.2%
Internet/Mail Order	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£130.17	£130.17	0.0%
Total	£0.90	£1.19	£1.19	£0.90	£0.60	£0.60	£0.30	£0.30	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£5.97	£695.03	£689.06	0.9%

Table 4 - Mixed Goods (B&M Bargains) Based Proposal Trade Diversion and Impact

Destination	Zone 1 £m	Zone 2 £m	Zone 3 £m	Zone 4 £m	Zone 5 £m	Zone 6 £m	Zone 7 £m	Zone 8 £m	Zone 9 £m	Zone 10 £m	Zone 11 £m	Zone 12 £m	Zone 13 £m	Zone 14 £m	Zone 15 £m	TOTAL DIVERSION £m	PRE DIVERSION	POST DIVERSION	TRADE
																	TURNOVER 2017 £m	IMPACT £m	DIVERSION IMPACT %
Chainridge Limited - Mixed Goods Proposal (B&M) % Turnover From Zone Trade Draw £m	15% £0.93	20% £1.24	20% £1.24	15% £0.93	10% £0.62	10% £0.62	5% £0.31	5% £0.31	0% £0.00	0% £0.00	0% £0.00	0% £0.00	0% £0.00	0% £0.00	0% £0.00	100% £6.22			
Arundel	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£2.91	£2.90	0.3%
Bognor Regis Town Centre	£0.40	£0.63	£0.57	£0.48	£0.22	£0.28	£0.06	£0.08	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£2.72	£68.46	£65.74	4.0%
Bognor Regis Other	£0.18	£0.23	£0.25	£0.18	£0.15	£0.12	£0.04	£0.04	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.19	£30.82	£29.63	3.9%
Littlehampton Town Centre	£0.00	£0.01	£0.00	£0.00	£0.01	£0.02	£0.03	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.08	£25.02	£24.94	0.3%
Littlehampton Other	£0.00	£0.00	£0.00	£0.00	£0.01	£0.02	£0.02	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.06	£22.47	£22.41	0.3%
Rustington	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£18.78	£18.77	0.1%
Rustington other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£0.01	0.0%
Ferring	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£7.03	£7.03	0.0%
Arun Elsewhere	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£1.45	£1.44	0.4%
Chichester City Centre	£0.27	£0.30	£0.36	£0.19	£0.18	£0.12	£0.12	£0.14	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.67	£111.06	£109.39	1.5%
Chichester Other	£0.04	£0.02	£0.03	£0.02	£0.02	£0.01	£0.01	£0.03	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.20	£15.75	£15.55	1.2%
Worthing Town Centre	£0.00	£0.01	£0.01	£0.00	£0.01	£0.03	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.07	£160.02	£159.95	0.0%
Worthing Other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£41.47	£41.47	0.0%
Holmbush/Shoreham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.01	£8.76	£8.75	0.1%
Brighton	£0.00	£0.01	£0.00	£0.02	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.04	£17.94	£17.90	0.2%
Portsmouth	£0.03	£0.03	£0.01	£0.03	£0.01	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.12	£8.28	£8.16	1.4%
Elsewhere	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.04	£24.63	£24.59	0.2%
Internet/Mail Order	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£130.17	£130.17	0.0%
Total	£0.93	£1.24	£1.24	£0.93	£0.62	£0.62	£0.31	£0.31	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£6.22	£695.03	£688.81	0.9%