

[REDACTED]

From: Kie Farrell [REDACTED]
Sent: 12 June 2014 17:12
To: Cian Cronin
Cc: Ed Kemsley
Subject: Proposed M&S Simply Food - BE/37/14/PL

Cian,

Further to our telephone conversation earlier today, please find attached our letter of objection to the above application on behalf of Morrisons.

Kind Regards,

Kie.

Kie Farrell
Senior Planner



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LINKED TRIPS RESEARCH FOR MORRISONS SUPERMARKETS
Prepared by Peacock and Smith, April 2012

Executive Summary

1. This research study aims to assess the occurrence, frequency and type of linked trips undertaken between Morrisons stores and defined town centres and has been informed by exit surveys undertaken by NEMS Market Research. The following three Morrisons stores were chosen as case studies for the survey:
 - Totnes, Devon
 - Goole, East Riding of Yorkshire
 - Retford, Nottinghamshire
2. A total of 1,293 customers were interviewed face-to-face at the Morrisons stores over a period of 6 days (Thursday to Wednesday) from 22 to 28 March 2012. The interviews were conducted at various times of day.
3. The survey as a whole found that 44.1% of all respondents had or intended to incorporate visiting the Morrisons store with a linked trip to the town centre on that day. These respondents had or intended to visit the town centre to undertake a number of activities, with the highest responses being shopping for other food (34.1%) and non-food items (41.3%), and visiting banks, building societies, Post Offices or cash points (51.7%).
4. When asked whether they ever made linked trips, approximately 60% of all respondents stated that they either always or frequently combined their visit to the Morrisons store with other activity in the town centre.

Totnes, Devon

5. The Morrisons store is located on Coronation Road to the north west of Totnes Town Centre. The store entrance is located approximately 205m walking distance from the retail frontage of the defined Central Shopping Area as identified on South Hams District Council's Proposals Map.
6. In the case of the Totnes survey, 51.8% of respondents said they would be combining their trip to the Morrisons store with visiting the town centre on that day, with 41.2 % of these people going to the town centre to shop for other food items, 53.6% for other non-food items and 57.4% visiting banks, the Post Office, building societies or cash points. Many also visited the town centre to eat out (34.4%) and meet friends or relatives (35.3%).

Goole, East Riding of Yorkshire

7. The Morrisons store at Goole is located on Boothferry Road to the north west of the defined town centre and railway line. The store entrance is located approximately 130m walking distance from the edge of the defined Commercial Core Boundary of Goole Town Centre, although it is a more substantial walking distance from the Primary Shopping Zone (approximately 500m) as defined by East Riding of Yorkshire Council's Proposals Map.

8. The survey found that a total of 38.5% respondents had or would be combining their trip to the Morrisons store with other activity in the town centre that day. A large number of these people were or had visited banks, the Post Office, building societies or cash points (51.7%) in the town centre, compared to 26.8% shopping for other food goods and 29.8% shopping for non-food items.

Retford, Nottinghamshire

9. The Morrisons store at Retford is located off Amcott Way to the north of the designated town centre. The store entrance is located approximately 360m walking distance from the edge of the defined Primary Shopping Area and 470m walking distance from the Primary Shopping Frontage of Retford Town Centre as identified on Bassetlaw District Council's Proposals Map.
10. A total of 41.5% of respondents interviewed at the Retford store had or were intending to combine their trip to the Morrisons store with a visit to the town centre on that day. Of these respondents the majority (45.1%) said they were visiting banks, building societies, the Post Office or cash points within the town centre, 33.1% were shopping for other food items and 38.3% were shopping for non-food goods.

KF/12June14)Arun

Sent by email only

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For the attention of Cian Cronin

12 June 2014

Dear Cian

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
PROPOSED M&S SIMPLY FOOD STORE, FORMER COMET UNIT (UNIT D1), ARUN RETAIL
PARK, SHRIPNEY ROAD, BOGNOR REGIS, PO22 9NF (REF: BE/37/14/PL).**

We act on behalf of Wm Morrison Supermarkets Plc (Morrisons) who operate a foodstore located within Bognor Regis Town Centre (30 Bedford Street, PO21 1RP).

We are writing to lodge a strong objection to the proposed out-of-centre M&S Simply Food store at Arun Retail Park.

Background

Morrisons currently operate a key 'anchor' store in Bognor Regis Town Centre (Bedford Street), which is 'policy protected' due to its town centre location. The store plays an important role in terms of the health of the town centre. It is the main food store within the town centre and therefore draws shoppers into the centre frequently and regularly, creating linked trips and pedestrian footfall. This has positive spin-off benefits for other shops within the town centre, contributing to the town's vitality and viability.

Sequential Sites

DPDS's review of the applicant's Retail Assessment (Para 3.12) notes that the applicant rules out the town centre Hothampton site as a location for the proposed M&S Simply Food store on the grounds of timing (suggesting that any unit within the Hothampton development would not be available until 2017). DPDS comment that ruling out the site on this basis has not been sufficiently justified and that more information should be provided by the applicant.

We would support DPDS's comments on this matter. Clearly the Hothampton site is a key town centre site and all new retail development should be directed to this site in the first instance.

We understand that the Council has requested this additional information from the applicant's agent. Once this information has been received we would be grateful if you could notify us so that we can comment on this, as required.

Managing Directors: Chris Creighton BA (Hons), MTP, MRTPI

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Head Office Address: Suite 9C Joseph's Well Hanover Walk
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Impact on Morrisons

Morrisons is concerned about the levels of impact on their existing town centre store and the town centre if the proposed M&S Simply Food store is granted planning permission. Both stores would draw trade from similar catchment areas and the existing town centre Morrisons store would, therefore, experience the greatest impact from the proposed out-of-centre M&S Simply Food store.

In this context, this objection letter carries significant weight and should be taken into full consideration in the determination of the planning application.

DPDS's review of the applicant's Retail Assessment considers (Paras 4.15 to 4.21) the likely impact of the proposed M&S on existing foodstores, including Morrisons.

At Para 4.18 DPDS state that they are not convinced by the applicant's methodology when considering trade draw, commenting that the methodology used may be unreliable, one of the results being that the level of impact on Morrisons is likely to have been underestimated.

The applicant estimates that the proposal's impact on Morrisons would be trade diversion of £0.51m or 3% of the store's turnover. We consider this has been significantly underestimated.

At Para 4.20 DPDS test an alternative methodology based on market share. Using this methodology Morrisons has a market share of 12% and the impact of the proposed M&S Simply Food on Morrisons would be double that estimated by the applicant (£1.02m / 6.1% of the store's turnover).

Impact on the Town Centre / Car Parking and Linked Trips

In considering the likely impact of the proposal on the overall vitality and viability of Bognor Regis town centre, DPDS conclude that the identified 6% impact on Morrisons would not threaten its continued trading. Para 4.23 goes on to state:

"while the store makes a valuable contribution to the town centre, there is no reason to believe that the impact would cause a significant wider harm to the centre"

DPDS conclude that the proposal is unlikely to cause significant adverse harm to the vitality and viability of the town centre.

We do not agree with this conclusion. Given that Morrisons is Bognor Regis Town Centre's main / anchor food store it plays an important role in terms of the health of the town centre drawing shoppers into the centre frequently and regularly, creating linked trips and pedestrian footfall. This has positive spin-off benefits for other shops within the town centre, contributing to the town's vitality and viability.

Furthermore, Morrisons ancillary car park is the main town centre car park, providing approximately 175 spaces in the form of a multi-storey car park above the store along with a surface level car park in the southern part of the site.

Whilst it is difficult to accurately quantify the number of linked trips that would be lost as a result of trade drawn away from the proposed out of centre M&S Simply Food, it is clear (particularly given that Morrisons Car Park also acts as a main town centre car park) that linked trips would be lost with a consequential reduction in trade to existing town centre retailers.

We note that the latest NEMS household survey (2012) prepared for Arun DC does not include specific questions / responses in respect of linked trips by customers as a result of their weekly food shop. However, we wish to highlight a relatively recent study in respect of three existing Morrisons which assessed the occurrence, frequency and type of linked trips. This comprised an exit survey by NEMS Market Research and a total of 1,293 face to face interviews. We attach a copy of the executive summary which includes a summary of the responses from customers using the three existing Morrisons stores. Whilst the location of the stores varied to between 130m to 500m from the Primary Shopping Area, you will note that as a whole 44.1% of respondents had or intended to incorporate visiting the Morrisons store with a linked trip to the town centre on that day. In the case of Morrisons Bognor Regis, we consider that a conservative estimate of linked trips by customers to be in the order of 40%, however a more realistic estimate could be as high as 50%.

The GE report fails to assess the potential impact on loss of linked trips as a result of the loss of the trade (estimated by DPDS to be in the order of £1.02m). Based on an average annual spend per person of around £1,950 this would generate a weekly spend of £37.50. £1.02m of trade would therefore amount to 27,200 annual customer trips to the Morrisons store. Based on the 40% to 50% linked trips estimate, as per above, we consider that the M&S proposals would result in the loss of between 10,880 (40%) and 13,600 (50%) linked trips from Bognor Regis Town Centre.

For the above reasons it is considered that the proposal's likely impact on the town centre has not been satisfactorily assessed and we therefore request that further work is done to consider the likely impact of the proposal on existing town centre retailers and to demonstrate that the proposed development would not have a harmful impact on the health of the town centre.

Historic Restrictive Planning Condition

The outline planning permission which approved Arun Retail Park (including the subject unit D1) (Ref: BE/169/88) included a condition restricting the sale of goods as follows:

"With the exception of the garden centre which shall be used only for that purpose, no retail unit or sub-division thereof shall be less than 10,000 sq ft gross and the goods sold shall be restricted to DIY suppliers, electrical goods, gardening requirements, floor coverings, household hardware, furniture and car accessories or any such use as the local planning authority shall agree in writing."

Essentially this is a bulky goods condition which precludes the sale of food and drink. The purpose being to protect the town centre.

Arun Retail Park is in an out of centre location and it is not considered that there is any good reason why the original bulky goods restriction should be lifted in order to accommodate the current foodstore proposal.

Morrisons Extension

Para 4.30 of DPDS's report discusses the unimplemented planning permission for an extension to Morrisons in the town centre. It is correct to note that this planning permission has expired, however it is incorrect to conclude that Morrisons have no intention of extending the store in the future. Whilst the planning permission has expired, it certainly remains Morrisons intention to extend the store and therefore the extension should continue to be considered as a commitment.

Summary

- It is considered that the town centre Hothampton site is a sequentially preferable site
- It is considered that the proposed development would have a harmful impact on the existing town centre Morrisons and the overall health of Bognor Regis Town Centre

We request the opportunity to comment on the applicant's further information in relation to the Hothampton site when this is received.

We would be grateful if you would acknowledge receipt of this objection. Please do not hesitate to contact Kie Farrell should you require any further information and/or clarification.

Yours sincerely



PEACOCK AND SMITH