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19 June 2014 **BY EMAIL & POST**

Our ref: NTH/JCW/J6462

Your ref: BE/37/14/PL

Dear Sir

Arun Retail Park

We refer to the planning application for alterations to Arun Retail Park to allow for occupation by Next and M&S (reference BE/37/14/PL).

We have been asked to respond to matters raised by DPDS in its report dated June 2014, particularly regarding the Hothampton Site.

We agree with DPDS conclusion that the site is unlikely to be suitable for Next.

With regard to M&S, we do not consider that the site is either available or suitable. This is because:

1. There are no published plans available indicating the size, position or configuration of any potential convenience unit at the Hothampton site of which we are aware. No proposed details have been put into the public domain since the 2012 public exhibition boards. These contained a schematic layout of the potential residential blocks. There was no suggestion from these plans of an intention to provide a retail unit of the size required by M&S Simply Food. It is not, therefore, possible to assess in any detail if the proposed development could accommodate a unit of a size and configuration suitable for M&S but preliminary drawings indicate that this is unlikely.
2. The site is owned by the Council, which intends to undertake a comprehensive redevelopment in partnership with St Modwen. We therefore do not consider that the site is available for redevelopment in isolation. The Minutes to the May 27 Bognor Regis Regeneration Sub-committee note, at Paragraph 21, that discussions continue with St Modwens.
3. The Development Agreement with St Modwen has not yet been completed. Given the Council's resolution to extend the Agreement on condition that a planning application was submitted by the end of 2014, and the fact that the agreement itself has not actually been extended, there must be growing uncertainty over the delivery of the scheme by 2017 which was the basis of our estimate in our report.
4. We further note that considerable concern has been expressed within Bognor Regis over the availability of car parking, and the effect of the Hothampton and Regis Centre

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developments on off-street car parking availability. This was noted within the 26 February 2013 Regeneration Sub-Committee report, and within the recent 27 May 2014 report. M&S Simply Food units of this format require close proximity to car parking which, we understand from the description of the proposals within the public domain, would not be available. Without close proximity to car parking the unit would be unsuitable. Notwithstanding this should M&S Simply Food open in this location irrespective of this, it would further add to parking stress in the surrounding area which is of local concern.

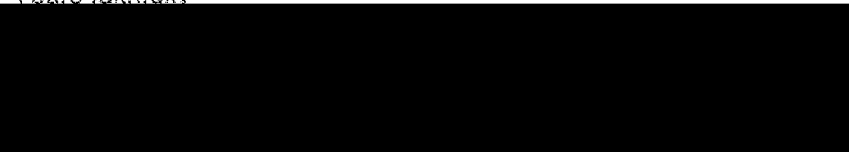
5. M&S Simply Food would not be suited to the type of local convenience retail for which provision is likely to be made in an edge-of-centre, residential led redevelopment. M&S Simply Food does not play a conventional top-up role, and instead focuses on providing a more limited range of pre-prepared food, rather than a range of basic groceries. The site would not be suitable for M&S because it is not compatible with its business model.

In summary, we do not consider that Hothampton site is available to accommodate the proposed development. Furthermore, we consider the prospect of it becoming available to be most uncertain, because of both uncertainty regarding the completion of the development agreement and the lack of any detailed design information against which to assess this, albeit that indicative consultation plans clearly show the proposed development would not have the scope to accommodate an M&S Simply unit of the size sought.

Whilst it does not go to the heart of the conclusions of the DPDS report, which we support, we also note that we consider the estimate of trade draw from the Morrisons town centre unit to be an overestimate, as it assumes trade draw in proportion to existing trading patterns. M&S' experience of other Simply Food units is that the closest large stores (in this case Tesco and Sainsbury) are likely to experience the highest level of trade draw. The approach adopted in our report, grouping existing convenience retailers into four categories, seeks to take into account the physical proximity of other retailers which experience has shown to be an important determinant in assessing M&S' trade draw.

We trust that this addresses the outstanding matters raised by DPDS, but if you should have any remaining queries please do not hesitate to contact James Wickham of this office.

Yours faithfully



Gerald Eve LLP

