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Planning Services,  
Arun District Council,  
Civic Centre,  
Littlehampton,  
BN17 5LF

26 January 2026

Dear Sir / Madam,

**TESCO SUPERSTORE, SHRIPNEY ROAD, BOGNOR REGIS  
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED): APPLICATION FOR FULL PLANNING PERMISSION**

On behalf of Tesco Stores Ltd (*"the Applicant"*), please find enclosed an application (*"the Application"*) for full planning permission for minor external alterations to facilitate a temporary Dot.com parking / loading area (*"the Proposed Development"*) at Tesco Superstore, Shripney Road, Bognor Regis (*"the Site"*).

**THE SITE**

The Site comprises an area of hardstanding, including a disused bus stop, adjacent to the vehicular access at the store (see **Figure 1.0** below). Dot.com / Click & Collect facilities are currently accommodated to the north of the store.



Figure 1.0: Aerial view of the Site with indicative red line boundary (Source: Google Maps)

The Site lies to the north of the A29 (Shripney Road), from which vehicular access to the Site is taken via Yvette Gozalez-Nacer Way. Shripney Road forms the southern boundary to the Site, and the Albingbourne Rife defines the boundary to the east. To the north, the Site is bound by a static caravan park (Riverside Caravan Centre). To the west of the Site is Durban Park Industrial Estate

The Site is not located within a Conservation Area and there are no listed buildings at or within close proximity of the Site.

The application site is identified on the Environment Agency's flood map as partly falling within Flood Zone 2/3.

## **BACKGROUND**

Over recent years, the car park at the Site has been subject to occasional but extensive flooding resulting in the store having to close. The frequency of these flood events has increased, and the impacts have worsened. The current Dot.com / Click & Collect facilities are located in an area that is susceptible to flooding, meaning that these services are interrupted during a flood. During the most recent flood (2024), the store (including Click & Collect and Dot.com operations) was closed for four weeks, followed by a further week when it was open to customers arriving by foot only.

The impacts of these store closures are far reaching. In addition to customers shopping in-store, circa 180,000 items a week are delivered to the local community, via the Click & Collect and Dot.com delivery services, with the store also fulfilling the Littlehampton 'site-to-site' Click & Collect.

The Dot.com delivery service covers an area spanning Bognor to West Durrington (west side of Worthing). The local area is characterised by an aging demographic and the Dot.com delivery service helps to serve the most vulnerable groups of the local population, including those unable to access the store themselves. During flood events, the Dot.com and Click & Collect facilities cannot operate, severely limiting the ability for Tesco to serve the local community, including those considered to be most vulnerable.

To enable these services to continue to operate during a flood, therefore, it is proposed that the disused bus stop at the store entrance is converted to a temporary Dot.com / Click & Collect facility, with space to accommodate three vehicles. This area will only be used on a temporary basis in the event of a flood.

## **THE PROPOSED DEVELOPMENT**

The Proposed Development comprises the removal of the existing disused bus stop adjacent to the store entrance, where existing site levels are higher than the recorded flood level, and external works to create a temporary parking / loading area for Dot.com vehicles for use during periods when the permanent parking / loading area is inaccessible as a result of flooding.

The existing bus stop has not been used by buses for a number of years, with operators instead running services from bus stops located just outside of the Site, on Shripney Road. It has been confirmed through pre-application discussions that the removal of the bus stop is acceptable.

External works include adjustments to the kerb to accommodate a dropped kerb to enable trolley access between the store and the Dot.com vehicles, the installation of bollards and new white line markings, which will include a designated pedestrian walkway around the proposed parking area to ensure the safe movement of staff.

In total, the temporary parking / loading bay will accommodate three Dot.com delivery vehicles at a time.

The proposed parking / loading area will only be used on a temporary basis during the event of a flood and will be controlled via an operational management plan to be implemented by Tesco during flooding. When not in use, the area will be controlled by signage to prevent unauthorised parking / use.

The Proposed Development forms part of a wider programme of flood mitigation works, including the installation of raised car parking deck to ensure that the store can remain operational during a flood. A separate planning application (ref: PP-

14469562) has been submitted for these works, which also includes the temporary Dot.com area. The creation of a temporary Dot.com facility has been identified as a priority for the store. Therefore, this application seeks planning permission for these works in isolation to enable these works to be delivered in advance of the wider programme of works.

## **PLANNING POLICY CONTEXT**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that *“if regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*.

Section 70 of the Town and Country Planning Act 1990 states that when determining applications for planning permission, the Local Planning Authority should *“have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations”*.

### **Adopted Development Plan**

The Site is located within the administrative boundary of Arun District Council ('ADC'). The adopted Development Plan for ADC comprises the Arun Local Plan 2011-2031 (2018) and Bognor Regis Neighbourhood Development Plan (2015).

In accordance with the adopted Development Plan, the Site is not subject to any site-specific policy designations.

### **Emerging Development Plan**

The Council is in the process of updating the Arun Local Plan. Regulation 18 consultation on a Direction of Travel Document was undertaken between 25 March 2024 and 13 May 2024. The Council is currently progressing the preparation of the evidence base that will underpin the emerging Arun Local Plan. The Local Plan programme is expected to be reviewed and updated in early 2026 to reflect forthcoming Government legislation and guidance relating to the new system for Local Plan preparation. Due to the early stage in the plan making process, no weight can be afforded to the emerging Local Plan.

### **Other Material Considerations**

In addition to the Statutory Development Plan Documents, a number of further documents comprise material considerations in the determination of planning applications. These include the National Planning Policy Framework (NPPF) (published in December 2024 and revised in February 2025), Planning Practice Guidance (PPG) and local Supplementary Planning Documents (SPDs) and Guidance (SPG).

On 16 December 2025, the Ministry of Housing, Communities and Local Government published a consultation on proposed reforms to NPPF, which would represent a significant update to national planning policy and guidance. The draft revised NPPF is intended to support the Government's objectives for sustainable growth, housing delivery and economic development, and includes proposed changes to how housing needs are assessed, the prioritisation of brownfield and sustainable development, and other wider planning system reforms.

The consultation is inviting views on the proposed revisions and other planning policy changes, which are expected to influence future local plan preparation and decision-making once finalised. The consultation runs until 10 March 2026.

## **PLANNING ASSESSMENT**

### **Principle of Development**

#### **Flood Risk and Climate Change**

The NPPF sets out the requirement for the planning system to take full account of all climate impacts including, inter alia, storm and flood risk (**Paragraph 161**).

**Paragraph 162** requires Development Plans to take into account the long-term implications for flood risk and include policies that support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts. In accordance with **Paragraph 163** *“the need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts”*.

At the local level, **Paragraph 3.32** of the Arun Local Plan acknowledges that the potential impacts of climate change need to be taken into account in planning for all new development. This will include locating major development away from areas of high flood risk, unless the development will help to remove the flood risk to benefit existing residents, businesses and for economic growth.

Local Plan **Policy ECC SP1** (Adapting to Climate Change) supports development which is located and appropriately designed to adapt to impacts arising from climate change, such as the increased probability of tidal and fluvial flooding.

### Socio-Economics

In accordance with **Paragraph 85** of the NPPF, planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. The approach taken should be flexible and allow businesses to address the challenges of the future, with planning policies playing an important role in addressing barriers to investment, such as inadequate infrastructure or a poor environment.

**Paragraph 96** identifies the ways in which planning policies and decisions should aim to achieve healthy, inclusive and safe places. **Paragraph 98** outlines the requirement to provide the social, recreational and cultural facilities and services the community needs. This includes the need to plan positively for the provision of shared spaces, community facilities (including local shops) and other local services to enhance the sustainability of communities. **Paragraph 98** goes on to identify the need to *“guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”*, in addition to ensuring *“that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community”*.

**Paragraph 8.1.1** of the Local Plan identifies that the local economy is a key measure of success for the District and highlights the aim of Local Plan policies to retain existing employment, accommodate future business needs and encourage local job growth. Another strategic objective identified within the Local Plan is the need to *“promote strong, well integrated and cohesive communities, through [...] provision of good quality accessible community facilities and a safe environment, which delivers an enhanced quality of life to all”* (**Paragraph 14.1**).

### Assessment

It is clear that the closure of the store and the inability for key services, such as Dot.com deliveries and the Click & Collect facility, to operate have a significant detrimental socio-economic impact on the local community, with the frequency of flood events, duration of store closures and, therefore, the magnitude of impacts increasing.

Consistent with the objectives of both national and local planning policy, the Proposed Development forms part of a wider programme of flood mitigation works that seek to futureproof the store to enable it to remain operational during adverse conditions, thereby allowing employment levels to be maintained, shoppers to access the store and the Click & Collect and Dot.com services and other associated store concessions, including the pharmacy, to continue to function and serve the local community.

Such benefits are considered to weigh positively in favour of the Proposed Development when assessed against relevant planning policy and in the overall planning balance. The principle of the Proposed Development is, therefore, considered to be acceptable and in accordance with the relevant policies of the statutory Development Plan.

It has been confirmed through pre-application discussions that the removal of the bus stop is acceptable. The Proposed Development will not affect traffic generation or access and, therefore, is considered to be acceptable in highways terms.

## SUMMARY AND CONCLUSIONS

This Application seeks full planning permission for external alterations, including the creation of a temporary Dot.com van parking / loading area, the removal of an unused bus-stop, and other minor alterations associated with the proposed parking / loading area.

The Proposed Development forms part of a wider programme of flood mitigation works at the store and will enable Dot.com / Click & Collect operations to operate from the store in the event of a flood. This will ensure that these valuable services continue to be available to the local community, including those considered to be more vulnerable.

In conclusion, this Statement demonstrates that the Proposed Development is in accordance with the relevant policies of the statutory Development Plan and that planning permission should, therefore, be granted.

## ADMINISTRATIVE MATTERS

This Application has been submitted via the Planning Portal (Ref: PP-14620242), together with the following documents:

- 1) Planning Application Form, prepared by Montagu Evans;
- 2) Site Location Plan (ref. 245201-IDL-01-XX-DR-A-P1501-S3-P01);
- 3) Existing Block Plan (ref. 245201-IDL-01-XX-DR-A-E1502-S3-P01);
- 4) Existing Partial Site Plan (ref. 245201-IDL-01-XX-DR-A-E1506-S3-P01);
- 5) Demolitions Plan (ref. 245201-IDL-01-XX-DR-A-E2505-S3-P01);
- 6) Proposed Block Plan (ref. 245201-IDL-01-XX-DR-A-P2526-S3-P01); and
- 7) Proposed Partial Site Plan (ref. 245201-IDL-01-XX-DR-A-P2528-S3-P01).

The statutory planning application fee of £681 including Planning Portal administration fee) has been calculated in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023, as amended, and payment has been made via BACS.

Should you have any questions or require further information, please contact Nathan Wilson ([nathan.wilson@montagu-evans.co.uk](mailto:nathan.wilson@montagu-evans.co.uk) / 07387 542303), Harriet Humphrey ([harriet.humphrey@montagu-evans.co.uk](mailto:harriet.humphrey@montagu-evans.co.uk) / 07826 552594) or Craig Blatchford ([craig.blatchford@montagu-evans.co.uk](mailto:craig.blatchford@montagu-evans.co.uk) / 07984 448484).

Yours sincerely,

*Montagu Evans*

**MONTAGU EVANS LLP**

Enc.