



RETAIL JUSTIFICATION

In respect of

**THE PRINCE ALBERT, COPTHORNE BANK, COPTHORNE,
CRAWLEY, WEST SUSSEX, RH10 3QX**

On behalf of

WESTCOAST CONVENIENCE LIMITED

Prepared by: **AA/DB**

Authorised by: **MR**

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Project Number: **R00942**

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1. INTRODUCTION

- 1.1 This Retail Justification Statement has been prepared by ROK Planning on the instruction of Westcoast Convenience Limited (the applicant) to support a planning application relating to the Site at The Prince Albert, Copthorne Bank, Copthorne, Crawley, West Sussex, RH10 3QX.
- 1.2 The planning application seeks planning permission for the following proposal:
- “Sever existing land to retain existing public house use and area of pub garden and erect a convenience store and 4 no. apartments with associated works, including alterations to the existing vehicular access and car park.”*
- 1.3 The proposal seeks to retain the existing public house on Site and a sizeable portion of the existing pub garden, whilst providing a block of 4 no. apartments (Use Class C3) and a Use Class E(a) convenience store (372sqm) to the rear of the Site on land which is surplus to the requirements of the pub.
- 1.4 The proposal was submitted via full planning application to Mid Sussex District Council on 3rd December 2024 (LPA ref. DM/24/2957). A number of public comments submitted in response to the proposal raise concerns regarding the impact of the proposed retail convenience store on the existing retail convenience provision within Copthorne village.
- 1.5 This Statement therefore seeks to provide further retail justification in support of the proposal.
- 1.6 Where necessary this Statement follows the requirements of the National Planning Policy Framework (NPPF) (2024) and its accompanying Planning Practice Guidance.
- 1.7 The subsequent sections of this assessment are structured as follows:
- **Section 2** outlines the development context;
 - **Section 3** sets out the planning policy context;
 - **Section 4** details the retail overview and impact assessment; and
 - **Section 5** provides an analysis and conclusion.

2. CONTEXT

Site Overview

- 2.1 The application Site comprises a detached two storey public house, The Prince Albert, which occupies a substantial corner plot at the junction of Copthorne Bank and Brookhill Road. The Site benefits from a large public garden to the rear and adjacent car park.
- 2.2 The Site is located within the historic core of Copthorne, as defined in The Copthorne Neighbourhood Plan (2021).
- 2.3 The Prince Albert (dating back from 1865) is not listed. However, it was registered as an Asset of Community Value (ACV) in September 2014. The ACV does not cover the surrounding land.

Proposal Overview

- 2.4 The proposal seeks to retain the existing public house and a sizeable portion of the existing pub garden, whilst providing a block of 4 no. apartments (Use Class C3) and a Use Class E(a) convenience store (372sqm) to the rear of the Site.
- 2.5 The existing car parking area will be utilised for both public house and retail use with access from Copthorne Bank. Parking and ancillary works to accommodate the residential apartments will be provided separately, accessed from Brookhill Road.
- 2.6 The proposed convenience store will have a gross internal area of 372sqm. When factoring in storage, staff areas and ancillary back-of-house requirements, it is anticipated that the store will provide an approximate net sales area of 260sqm. Notably, this falls below the 280sqm limit contained within the Sunday Trading Act.
- 2.7 Indeed, given the scale of the proposed store, the proposed development is intended to function as a local convenience food store serving those in the immediate locality, primarily as a day-to-day 'top-up' convenience shopping destination.
- 2.8 The proposal was submitted via a full planning application to Mid Sussex District Council on 3rd December 2024 (LPA ref. DM/24/2957):

“Sever existing land to retain existing public house use and area of pub garden and erect a convenience store and 4 no. apartments with associated works, including alterations to the existing vehicular access and car park.”

- 2.9 The planning application has since received a large number of public comments, comprising a mix of support and objection.
- 2.10 A number of public comments submitted in response to the proposal raise concerns regarding the impact of the proposed retail convenience store on the existing retail convenience provision within Copthorne village.
- 2.11 This Statement therefore seeks to provide further retail justification in support of the proposal.
- 2.12 The following section sets out the relevant planning policy context applicable to this Statement.

3. PLANNING POLICY AND GUIDANCE

3.1 The following planning policy and guidance is relevant in the context of the application Site:

- The National Planning Policy Framework (2024) (NPPF);
- Mid Sussex District Council (MSDC) Local Plan 2014 – 2031 (March 2018);
- MSDC Local Plan (March 2018) Policies Map Inset 8a: Copthorne;
- The Copthorne Neighbourhood Plan (June 2021); and
- Planning Practice Guidance.

3.2 These are addressed where relevant below.

National Planning Policy Framework (2024)

3.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and is a material consideration in planning decisions.

3.4 Paragraph 85 of the NPPF states:

3.5 *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."*

3.6 The NPPF provides the following definition of town centres:

"...References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance...."

3.7 In terms of retail impact, paragraph 94 of the NPPF states that:

"When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace). This should include assessment of:

a) 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

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)."

Mid Sussex District Council (MSDC) Local Plan 2014 – 2031 (March 2018)

3.8 Policy DP6 (Settlement Hierarchy) of the MSDC Local Plan (2018) sets out that:

"Development will be permitted within towns and villages with defined built-up area boundaries. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale (with particular regard to DP26: Character and Design), and not cause harm to the character and function of the settlement."

3.9 Copthorne is a Category 2 settlement under policy DP6 and is defined as a:

"Larger village acting as Local Service Centres providing key services in the rural area of Mid Sussex. These settlements serve the wider hinterland and benefit from a good range of services and facilities, including employment opportunities and access to public transport."

3.10 Policy DP2 (Town Centre Development) seeks to create and maintain town and village centres. It sets a local threshold for the provision of Retail Impact Assessments:

"Planning applications proposing the construction of 500m² or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not have a significant adverse impact on a town centre, either on their own or cumulatively in the area."

3.11 The application proposal (372sqm gross) therefore falls below both the local and national threshold for an impact assessment.

The Copthorne Neighbourhood Plan (CNP) (June 2021)

- 3.12 Policy CNP4 (Important Community Facilities) of The Copthorne Neighbourhood Plan (2021) identifies Important Community Facilities and seeks to protect against their loss.
- 3.13 The Prince Albert is identified as an Important Community Facility. The Copthorne Post Office is similarly identified as such a facility.

Planning Practice Guidance (PPG)

- 3.14 Planning Practice Guidance (PPG) provides information on retail development and decision making.
- 3.15 Regarding the retail impact test, the guidance notes that the test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible.
- 3.16 The guidance continues to set out a number of steps to undertaking the test, and notes that in terms of trade draw the assessment should relate to a certain geographic area and a particular market segment (e.g. convenience retail).

Policy Summary

- 3.17 The Site is located within an area designated as a Category 2 settlement under policy DP6, being a 'Larger Village' acting as a 'Local Service Centre'.
- 3.18 On that basis, taking into account the NPPF definition of town centres, the Site is 'in-centre'. In other words, it is the preferred location for main town centre development (including retail).
- 3.19 Given the above, in accordance with both local and national policy, neither the retail sequential nor the retail impact tests are required to be undertaken to justify the proposed retail use.
- 3.20 In any case, the Site would fall below the local threshold set out under policy DP2 where a retail impact assessment would be required.
- 3.21 There is no local or national planning policy requirement to demonstrate retail need.

4. RETAIL OVERVIEW

Introduction

5.1 This Statement looks to address concerns that have been raised as a result of public objection to the planning application. Taking into account the contents of the objections against the relevant planning policy context, in the first instance it is important to highlight the following:

- There is no planning policy requirement to demonstrate retail 'need';
- The Site is located as a designated village centre under Local Plan policy DP6 and, in accordance with the NPPF, is therefore an 'in-centre' location. On that basis, neither the retail sequential nor the retail impact tests need be applied;
- Even if there was a requirement to apply the retail impact test to this proposal based on its location, it would in any case fall below the local threshold of 500sqm and way below the national threshold of 2500sqm where such an assessment is needed; and
- Economic market competition is not a material planning consideration. Speculation about the potential impacts on existing businesses cannot influence nor be considered by a decision maker in the determination of this application.

5.2 However, notwithstanding the above, the concerns raised are recognised and this Statement has been prepared to provide further justification for the proposed convenience store.

5.3 Primarily, the remainder of this section seeks to provide reassurance that there is sufficient capacity within the Village to accommodate an additional retail store.

Defining the Area

5.4 As detailed earlier in this report, the development is proposed to operate as a local convenience store operating on a top-up basis to serve a local catchment.

5.5 The following aspects of the development demonstrate that the proposed store will serve a local catchment only:

- The store will be only 372sqm in size. Convenience stores of this size usually only sell approximately 2,500 product lines, far fewer than the range of lines generally sold in larger supermarkets (between 8,000 to 30,000);
- The actual shop floor will be even smaller at circa 260sqm when factoring in back-of-house requirements, which is below the Sunday Trading Act threshold of 280sqm;
- The shopping trips undertaken at convenience stores are of a small size, usually providing essential goods on a top-up basis;
- The proposed store is well below the national threshold of 2500sqm in terms of requirement for the impact test; and
- The proposed store is additionally below the 500sqm threshold set out within policy DP2 of the MSDC Local Plan (2018).

5.6 The Site is located within the core of Copthorne village, a Category 2 settlement under policy DP6 of the MSDC Local Plan (2018).

5.7 On this basis, it is considered appropriate to limit the study area to Copthorne village, in accordance with the NPPG which states that the impact test should be *“undertaken in a proportionate and locally appropriate way”*.

Convenience Expenditure in Copthorne Village

5.8 The retail evidence base for this Retail Justification Statement is the Mid Sussex Retail Study¹ (MSRS) (March 2022) prepared by Nexus Planning on behalf of MSDC.

5.9 The study divides the wider area into 10 study area zones according to postal sectors. Zone 5 forms the Crawley/East Grinstead area (which covers Copthorne and is therefore the ‘zone’ that is relevant to this assessment).

5.10 The MSRS estimates convenience expenditure per capita (£) by zone over the period from 2021 – 2038. The estimated 2026 convenience expenditure per capita (£) for Zone 5 (Crawley/East Grinstead) is £2,283 (based on ‘adjusted SFT’ forecast growth rates taken from Table 6 of the Experian Retail Planner Briefing Note 18).

5.11 Whilst the MSRS notes the population forecasts for Zone 5 (Crawley/East Grinstead) (derived from Experian MMG3 data 2020 report), the Office for National Statistics (ONS) provides an updated population figure of 5,010 specifically for the Copthorne and Worth Ward in Mid Sussex², based on the most recent 2021 census via the NOMIS website. The ONS figure will therefore help to

¹ Mid Sussex Retail Study (MSRS) Nexus Planning (March 2022)

² Office for National Statistics Nomis, 2021 Census Area Profile for Copthorne and Worth Ward (as of 2022), Mid Sussex Local Authority and England Country

provide a more accurate understanding of the total available convenience expenditure in Copthorne Village (in a given year from 2021 onwards).

- 5.12 In addition to this, population growth resulting from new major residential development coming forward in and around Copthorne from 2021 onwards must be taken into account.
- 5.13 Of particular note, a 500-home development in Copthorne³, originally granted planning permission under outline planning permission 13/04127/OUTES in 2014, is coming forward. Reserved matters application DM/18/4321 was granted permitting phases 1 and 2, and reserved matters application DM/21/0644 was granted permitting phases 3 and 4. The accommodation schedule and further documents associated with the permissions confirm that a total of 500 homes are to be delivered. Specifically, the schedules estimate that the additional homes will accommodate an extra 1,918 persons.
- 5.14 On the above basis, the total population figure for Copthorne used in this impact assessment is 6,928. It should be noted that this assumes that there has been no other population growth in the area from 2021 aside from the 500-home development noted above.
- 5.15 The estimated total convenience expenditure (£) for Copthorne can be calculated using the overall Zone 5 convenience expenditure per capita forecasts from the MSRS (2022)⁴, and the population data.
- 5.16 However, this calculation provides the estimated total available convenience expenditure. Given the proposed store is a local top-up convenience store only, it is necessary to estimate the total available expenditure for top-up convenience alone.
- 5.17 Taking into account the distance between the application Site and larger settlements, and factoring in general shopping trends, it is considered that shoppers are likely to undertake one bulk shop per week with essential top-up shops undertaken more frequently. On this basis, the total convenience expenditure figures are halved in order to calculate the available top-up convenience expenditure in Copthorne. These figures are as follows:
- Total convenience expenditure – £15,816,624; and
 - Total top-up convenience expenditure – £7,908,312

³ Heathy Wood, Worsell Drive, Copthorne, West Sussex, RH10 3RX – Taylor Wimpey [Heathy Wood • New homes in Copthorne • Taylor Wimpey](#)

⁴ Mid Sussex Retail Study (MSRS) Nexus Planning (March 2022)

- 5.18 As above, it should be noted that this projection assumes no further population growth in Copthorne from 2021 onwards within the exception of the identified large-scale 500-home development.

Existing Retail Provision within Copthorne

- 6.1 In terms of existing retail convenience of comparison to the proposal, the shops identified within Copthorne village centre are the following:
- Kwik Mart, located at 6 Copthorne Bank, RH10 3QX;
 - Copthorne Village Store, located at Copthorne Bank, RH10 3QZ; and
 - Morrisons Daily, located at Vigars Corner, Church Road, RH10 3RA.
- 6.2 Planning permission ref. DM/24/2590⁵ permitted a side storage extension at the Kwik Mart located at 6 Copthorne Bank. The GIA provided on the application form associated with the permission illustrates that the Kwik Mart operates with a total sales floor area of 81.2sqm.
- 6.3 Planning permission ref. 09/01113/FUL⁶ reveals floorplans for the Copthorne Village store and illustrates a total sales floor area of 75sqm. In addition to this, planning permission LPA ref. DM/15/1795⁷ reveals floorplans for the Morrisons Daily and illustrates a total sales floor area of 115.6sqm.
- 6.4 Taking the above into account, the total sales floor area for existing retail provision in Copthorne village centre is therefore assumed to be 271.8sqm.
- 6.5 The sales density figure used to assess retail expenditure within this Statement has been extracted from the MSRS (2022)⁸. The figures used is £11,118, which is itself based on a supermarket in Crawley Down village centre.
- 6.6 The selection of this figure is considered highly robust given it is based on a supermarket located elsewhere, and the actual sales density of the existing stores is likely to be lesser.
- 6.7 Taking the total sales floorspace of the Kwik Mart, Copthorne Village store and Morrisons Daily, and multiplying by the sales density figure, it is possible to calculate the estimated turnover of existing convenience retail provision in Copthorne village centre. This is presented below:

⁵ Mid Sussex District Council Planning – Search Reference DM/24/2590

⁶ Mid Sussex District Council Planning – Search Reference 09/01113/FUL

⁷ Mid Sussex District Council Planning – Search Reference DM/15/1795

⁸ Mid Sussex Retail Study (MSRS) Nexus Planning (March 2022)

- Total existing retail convenience provision sales floorspace in Copthorne: 271.8sqm
- Sales density: £11,118
- Total estimated turnover of existing retail convenience provision in Copthorne: £3,021,872.40.

6.8 The total estimated turnover of the existing stores is compared to the estimated turnover of the proposed store, and in turn the available convenience expenditure, in the following section.

Proposed Retail Provision

6.9 The application seeks to provide a local convenience store of 372sqm gross, translating to a shop floor area of 260sqm.

6.10 For the purposes of assessing the potential turnover of the proposed store, the same robust sales density figure of £11,118 has been adopted.

6.11 As per the approach with existing retail provision, it is possible to apply the estimated sales densities and the proposed sales area of the development in order to estimate the projected turnover of the proposed store. This is presented below:

- New proposed retail convenience store total sales floorspace: 260.4sqm
- Sales density: £11,118
- Total estimated turnover of new proposed retail convenience store: £2,895,127.20

6.12 The estimated turnovers of both the existing and proposed convenience retail provision can be compared against the total available convenience retail expenditure to provide an indication of retail capacity.

Assessment of Capacity

6.13 The total available expenditure for convenience goods within Copthorne village has been calculated using the forecast 2026 expenditure per head provided within the MSRS (2022) for zone 5⁹ and the estimated population of Copthorne. This

⁹ Mid Sussex Retail Study (MSRS) Nexus Planning (March 2022)

has been halved in order to estimate the total available expenditure for top-up convenience goods.

- 6.14 This can be compared to the sum of estimated turnover of existing stores and the estimated turnover of the proposed store in order to review whether there is a sufficient capacity.
- 6.15 Comparing the figures indicates a surplus available top-up convenience expenditure figure of £1,991,312.40.
- 6.16 The above demonstrates that the proposed retail unit can be accommodated within Copthorne village based on existing available retail expenditure, indeed with a significant surplus, even when adopting incredibly robust parameters.

Additional Considerations

- 6.17 Whilst it has been demonstrated that the proposed unit can be accommodated within Copthorne village based on existing and forecast population, the points below which highlight the robustness of the approach should be noted.
- 6.18 The population figure for Copthorne and Worth ward is taken from the ONS Nomis data website¹⁰ and for the purposes of this assessment, it has been assumed that population will not increase over a projection period between 2021 and 2026 (with the exception of the inclusion of a permitted 500-bed development¹¹).
- 6.19 Mid Sussex District has a housing need (assessed under the standard method as per the NPPF published in December 2024) of 1,039 dwellings per annum¹².
- 6.20 It can therefore be assumed that, in addition to the 500 home Taylor Wimpey housing development that has already been included within the calculations, at least some further housing is likely to be delivered within Copthorne and its immediate surroundings.
- 6.21 On the above basis, the identified surplus within the preceding section of this Statement is likely to be an under-estimation.

¹⁰ Office for National Statistics Nomis, 2021 Census Area Profile for Copthorne and Worth Ward (as of 2022), Mid Sussex Local Authority and England Country

¹¹ Heathy Wood, Worsell Drive, Copthorne, West Sussex, RH10 3RX – Taylor Wimpey [Heathy Wood • New homes in Copthorne • Taylor Wimpey](#)

¹² Mid Sussex District Council Housing Supply and Trajectory Topic Paper (July 2024)

Summary

- 6.22 The proposed retail unit can be accommodated within Copthorne village based on existing available expenditure, with a high surplus remaining, even when assuming a limited population growth from 2021 to 2026 and adopting an incredibly robust sales density figure.
- 6.23 Furthermore, whilst it is emphasised that considerations of retail 'need' have been removed from national planning policy, and that, in any case, there would be no need to undertake such an assessment at this Site, it is argued that such a high surplus can indeed be interpreted to demonstrate a 'need' for additional retail convenience premises.

5. CONCLUSION

- 7.1 This Retail Justification Statement has been produced in order to support a planning application for the creation of a new convenience store on the existing application Site.
- 7.2 This Statement looks to address concerns that have been raised as a result of public objection to the planning application. Taking into account the contents of the objections against the relevant planning policy context, in the first instance it is important to highlight the following:
- There is no planning policy requirement to demonstrate retail ‘need’;
 - The Site is located as a designated village centre under Local Plan policy DP6 and, in accordance with the NPPF, is therefore an ‘in-centre’ location. On that basis, neither the retail sequential nor the retail impact tests need be applied;
 - Even if there was a requirement to apply the retail impact test to this proposal based on its location, it would in any case fall below the local threshold of 500sqm and way below the national threshold of 2500sqm where such an assessment is needed; and
 - Economic market competition is not a material planning consideration. Speculation about the potential impacts on existing businesses cannot influence nor be considered by a decision maker in the determination of this application.
- 7.3 However, notwithstanding the above, the concerns raised are recognised and this Statement has been prepared to provide further justification for the proposed convenience store.
- 7.4 A high-level assessment of retail impact and potential retail capacity has been undertaken. This is set out in full at Section 4 of this report. It is concluded that the proposed retail unit can be accommodated within Copthorne village based on existing available expenditure, with a high surplus remaining, even when assuming a limited population growth from 2021 to 2026 and adopting an incredibly robust sales density figure.

- 7.5 The application will similarly provide a number of retail benefits, such as improved access to convenience retail goods and the creation of additional employment opportunities.
- 7.6 The proposed development is therefore considered acceptable in retail terms.