



PLANNING APPLICATION FOR UP TO 300 NEW HOMES, A LOCAL CENTRE AND EMPLOYMENT LAND

RETAIL STATEMENT

LAND AT OCCUPATION LANE, WOODVILLE

ON BEHALF OF HARWORTH GROUP PLC

Date: July 2019

Pegasus Reference: (JB/P18-0670/R001)

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1. EXECUTIVE SUMMARY

- 1.1 This Retail Statement has been prepared in support of the proposed local centre at Occupation Lane, Woodville and assesses the proposed main town centre uses against the relevant sequential and impact tests. The proposed local centre uses include a foodstore, public house and restaurant/takeaway.
- 1.2 A detailed sequential assessment has been prepared assessing a range of in, edge and out-of-centre sites within the primary catchment area as agreed through pre-application discussions. A total of 12 sites have been assessed and all of them have been demonstrated to be unsuitable and/or unavailable to accommodate the proposed local centre given their size, the presence of active uses and site-specific issues. Given this, the application site is the most sequentially preferable location capable of accommodating the proposed development, located approximately 380m from the edge of Woodville local centre.
- 1.3 To inform the assessment of impact, detailed health checks have been carried out for Woodville local centre and Swadlincote town centre building upon those surveys carried out as part of the 2015 Town Centre Retail Study. These health checks demonstrate that both centres are vital and viable, with Swadlincote town centre having very low vacancy rates, less than half of national averages, and a strong mix of national and independent retailers.
- 1.4 The proposed foodstore will provide a smaller main food shopping facility serving the wider proposed development as well as pass-by traffic and those living and working in Woodville as well as the southern and eastern areas of Swadlincote and the surrounding rural area. Given this, the foodstore will draw its trade from existing main foodstores within Swadlincote and Ashby-de-la-Zouch which all draw trade from the local area, the majority of which are located outside of the defined centres for the purposes of the impact test.
- 1.5 The comprehensive assessment of impact has been carried out which assumes a worst-case scenario in respect of potential turnover and trade diversion. Given the limited trade diversion from the town centres and their strong trading performance, the development would not result in a significant adverse impact on any defined centre. No planned or committed investment was identified that the proposed development would have an impact on.
- 1.6 This statement therefore demonstrates that the proposed development accords with the relevant impact and sequential tests as set out in NPPF paragraph 90 and Local Plan Part 2 Policy RTL1.

2. INTRODUCTION & PROPOSED DEVELOPMENT

- 2.1 This Retail Statement has been prepared on behalf of Harworth Group PLC in support of an outline planning application for up to 300 homes, a local centre and employment development at Occupation Lane, Woodville. This Statement deals with matters relating to the retail impact and sequential test only in respect of the proposed main town centre uses which make up the proposed Local Centre. This should be read alongside the submitted Planning Statement.

Proposed Local Centre Development

- 2.2 The proposed main town centre uses will deliver a small local centre which complements the wider mixed-use development of the site including a foodstore (Use Class A1) of circa 1,600m² gross floorspace, a Public House (Use Class A4) of circa 550m² gross floorspace; and a Restaurant/Fast-Food (Use Class A3/A5) of circa 700m² (gross).
- 2.3 As the proposed development is submitted in outline, no operators for the proposed units have been identified at this stage. Nevertheless, it is expected that the foodstore would be occupied by a national operator and will serve a predominantly localised catchment that provides a smaller main convenience goods shopping facility along with a limited ancillary comparison goods offer. It is expected that this store would be operated by a national multiple and could be either occupied by a 'discount foodstore' or a traditional foodstore operator.
- 2.4 In terms of the potential occupation by a discount foodstore operator, given the presence of existing Aldi and Lidl stores within a 5-minute drive of the site, both of which occupy recently constructed and modern format stores, it is considered highly unlikely that the proposed store would be occupied by these retailers. Nevertheless, there are newer entrants to the discount foodstore market in the form of Jack's and The Food Warehouse by Iceland both of which are not represented in the town, albeit noting that Iceland operate a traditional store focused on the sale of frozen foods at the Pipeworks.
- 2.5 Whilst the traditional foodstore operators have significantly reduced new store openings in recent years, new store openings have generally focused on smaller foodstore formats such as that proposed. As such, it is considered that the foodstore could be occupied by a number of operators although recognising that it is unlikely that either Morrison's or Sainsbury's would occupy the store given the presence of their existing superstores within Swadlincote which are significantly larger than that proposed.
- 2.6 The public house is expected to be a food-led facility whilst the restaurant/fast food unit could be occupied by a restaurant provider or operate as a drive-thru restaurant facility. Both are expected to be occupied by national operators and would serve a localised catchment as well as pass-by traffic travelling along the new Woodville – Swadlincote Regeneration Route.

3. RETAIL PLANNING POLICY

- 3.1 This subsection briefly summarises the key policy considerations in respect of the retail impact and sequential tests for main town centre uses.

NPPF

- 3.2 Chapter 7 of the NPPF sets out policies relating to town centres and main town centre uses. The glossary at Annex 2 confirms that main town centre uses include retail development, leisure, entertainment and more intensive sport and recreation uses (including restaurants and health and fitness centres), offices and arts, culture and tourism development.
- 3.3 Paragraph 86 requires proposals for main town centre uses to demonstrate accordance with the sequential test where they are located in an out-of-centre location and are not in accordance with an up-to-date plan (i.e. not allocated for such uses). In applying the sequential test, Para. 86 confirms that main town centre uses should be located in town centres then in edge of centre locations, and only if suitable sites are not available (or not expected to become available within a 'reasonable period' should out of centre locations be considered.
- 3.4 Paragraph 87 goes on to confirm that when considering edge and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Para. 87 also requires applicants to demonstrate flexibility on issues such as format and scale through the application of the test.
- 3.5 Paragraph 89 requires the preparation of an impact assessment when assessing applications for retail and leisure development outside town centres where they are not in accordance with an up-to-date plan, considering the impact of the proposal on planned public and private investment in centres and on town centre vitality and viability. An impact assessment is only required where the proposals exceed a locally set threshold or, in the absence of any such threshold, for proposals over 2,500m² of gross floorspace.
- 3.6 Paragraph 90 confirms that where an application fails the sequential test or is likely to have a significant adverse impact on one or more of the impact considerations set out at paragraph 89, it should be refused.

Planning Practice Guidance (PPG)

- 3.7 The PPG provides guidance relating to the application of the sequential test highlighting the need for any assessments to be proportionate and appropriate to the proposed development and reiterating the need to demonstrate flexibility in the format and scale of the proposed development.
- 3.8 The PPG also provides advice as to the application of the impact test confirming that:
- Impact should be tested over an appropriate period of up to 5 years from application submission (or up to 10 years for major/complex schemes);

- The impact test should be undertaken in a proportionate and locally appropriate way; and
- The general approach/methodology for the application of the impact test.

Local Plan

- 3.9 For the purposes of this application, the Local Plan is made up of the South Derbyshire Local Plan Part 1 (2016) and Local Plan Part 2 (2017). Of relevance to the consideration of the sequential and impact tests are Local Plan Part 1 Policies S7 and E6 along with Local Plan Part 2 Policy RTL1 and RTL2.
- 3.10 Part 1 Policy S7 confirms that the role of Swadlincote Town Centre will be supported and enhanced where possible and that the town centre boundary is to be established through the Local Plan Part 2.
- 3.11 Part 1 Policy E6 relates to the application site referring to it as the 'Woodville Regeneration Area'. This policy confirms that the site will be protected for employment-led development supported by the Woodville – Swadlincote Regeneration Route to developer 12ha of employment development (B1, B2 and B8) and up to 150 new dwellings. The policy does not make an allowance for main town centre uses (other than B1 offices) to be delivered on the site.
- 3.12 Local Plan Part 2 Policy RTL1 confirms the retail hierarchy in South Derbyshire identifying Swadlincote Town Centre at the top of the retail hierarchy followed by a number of local centres including High Street, Woodville. A town centre boundary and Primary Shopping Frontage is illustrated on the proposals map for Swadlincote Town Centre although boundaries are not identified for the local centres, with only general locations of these being highlighted. The Policy goes on to confirm the application of the sequential test for main town centre uses outside of the defined centres and the need for all retail proposals over 1,000 m² (gross) to be supported by a detailed retail impact assessment considering the impact of the proposals on the vitality and viability of nearby centres and committed/planned investment in those centres.
- 3.13 Policy RTL2 identifies a number of potential redevelopment location within and around Swadlincote Town Centre.

Policy Requirements Conclusions

- 3.14 Whilst the strategic site allocation allocates the land to deliver a mixed-use development, this does not extend to main town centre uses (other than offices) and as such the application site is considered to be an out-of-centre location. Given this, there is a requirement to demonstrate accordance with the sequential test as set out in NPPF Paras. 86 and 87 and Local Plan Part 2 Policy RTL1.
- 3.15 In addition, as the proposed development exceeds 1,000m² of retail floorspace, there is a requirement for the application to be supported by a retail impact assessment and considered against the impact test as set out at NPPF Paras. 89/90 and Local Plan Part 2 Policy RTL1.

4. SEQUENTIAL TEST

4.1 This section considers the proposed development against the requirements of the sequential test as set out at NPPF Paras. 86-88 and Local Plan Part 2 Policy RTL1. The following issues are considered in turn:

- The Application of the Sequential Test – Relevant Decisions and Case Law;
- Sequential Assessment Methodology;
- Site Assessments; and,
- Sequential Assessment Conclusions.

The Application of the Sequential Test – Relevant Decisions and Case Law

4.2 Before moving on to consider the methodology for the sequential assessment, it is important to consider the significant and pertinent case law and Secretary of State decisions which provide guidance and clarification on how the sequential test should be applied in respect of the need to demonstrate flexibility, the consideration of availability and the requirement to consider the disaggregation of a proposed development. The following considers these matters and provides a brief summary of relevant decisions. In doing this, we make reference to the following decisions:

- Supreme Court's decision in March 2012 in Tesco Stores Ltd v Dundee City Council¹ (the 'Dundee decision');
- Appeal decision for an extension to an existing Sainsbury's store in Crawley² (the 'Crawley decision');
- High Court Decision involving Zurich Assurance Ltd (Threadneedle Property Investments) v North Lincolnshire Council and Simons Developments Ltd in relation to the redevelopment of a Garden Centre site for a retail park, including an M&S store in Scunthorpe³ (the 'Scunthorpe decision');
- Secretary of State called-in decision at Rushden Lakes, Northamptonshire for a retail and leisure park development⁴ (the 'Rushden Lakes decision');
- Secretary of State called-in appeal decision at Broomhills Industrial Estate, Braintree for a Sainsbury's supermarket⁵ (the 'Braintree decision');

¹ [2012] UKSC 13

² APP/Q3820/A/11/2158410/NWF

³ [2012] EWHC 3708 (Admin)

⁴ APP/G2815/V/12/2190175

⁵ APP/Z1510/A/14/2219101

- High Court decision involving Aldergate Properties Ltd v Mansfield District Council and Regal Sherwood Oaks Ltd in relation to the development of a foodstore in Mansfield⁶ (the 'Mansfield decision');
- Secretary of State called-in decision in respect of an application for a designer outlet centre at Scotch Corner, North Yorkshire⁷ (the 'Scotch Corner decision');
- Secretary of State called-in appeal decision at Tollgate Village, Stanway for a mixed-use development comprising leisure and retail uses⁸ (the 'Tollgate decision'); and
- Secretary of State called-in decision at The Mall, Cribbs Causeway, South Gloucestershire for a mixed-use development comprising retail, food and drink, leisure, hotel and residential uses⁹ (the 'Cribbs Causeway decision');
- Appeal decision for an extension to an existing retail park at Leamington Shopping Park, Leamington Spa¹⁰ (the 'Leamington Spa decision'); and,
- Secretary of State called-in decision at land at Earl Road, Handforth Dean, Cheshire for a mixed-use retail-led out-of-centre retail park development¹¹ (the 'Handforth Dean decision').

Suitability - General

- 4.1 NPPF Paragraph 86 highlights the need to consider the suitability of sites stating that:

'Main town centre uses should to be located in town centres, then in edge of centre locations and; only if suitable sites are not available...should out of centre sites be considered'

- 4.2 Taking this into account, it is important to consider what the term "suitable" means in the application of the sequential test. In this regard, the Dundee decision, a Supreme Court decision, confirmed what "suitable" means in respect of the sequential test that applied in Scotland at the time. Lord Reed provided comment on the consideration of suitable sites at paragraph 29 of the judgement stating that:

'Provided the applicant has [given consideration to the scope for accommodating the development in a different form and to have thoroughly assessed sequentially preferable locations]... the question remains... whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.'

- 4.3 As part of the same case, Lord Hope perceptively added, at paragraph 38:

⁶ [2016] EWHC 1670 (Admin)

⁷ APP/V2723/V/15/3132873 and APP/V2723/V/16/3143678

⁸ APP/A1530/W/16/3147039

⁹ APP/P0119/V/17/3170627

¹⁰ APP/T3725/W/18/3204311

¹¹ APP/R0660/V/17/3179610, APP/R0660/V/17/3179605 and APP/R0660/V/17/3179609

'The context indicates that the issue of suitability is directed to the developer's proposals, not some alternative scheme which might be suggested by the planning authority. I do not think that this is in the least surprising, as developments of this kind are generated by the developer's assessment of the market that he seeks to serve. If they do not meet the sequential approach criteria, bearing in mind the need for flexibility and realism to which Lord Reed refers..., they will be rejected. But these criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest in doing so.'

- 4.4 As the Dundee decision related to the sequential test which applied at that time in Scotland, it is important to consider how it should be read and understood in respect of the sequential test as set out at Paragraph 86 of the NPPF. In this respect it is important to note that the Dundee decision has been cited on numerous occasions within subsequent high court and Secretary of State/appeal decisions in England.
- 4.5 In this respect, it is important to note the Inspector's commentary within the Crawley decision. Paragraph 85 confirms that the Dundee decision was a material consideration for planning applications made under the English planning system. The Scunthorpe decision, which is referred to later within this section of the report, also cited the Dundee decision confirming its relevance to the English planning system.
- 4.6 The Dundee decision clearly establishes what suitable means in relation to the sequential assessment confirming that any site must be suitable for the commercial requirements of the development and, subject to demonstrating flexibility, must be suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit a sequentially preferable site.
- 4.7 The Rushden Lakes decision also dealt with the issue and provided further commentary on the matter of suitability. The Inspector's Report, endorsed by the Secretary of State, highlighted at paragraph 8.43 that the key question when considering suitability must be *'suitable for what'* going on to confirm that; *'the answer to this question of law is suitable for the development proposed by the Applicant.'* Paragraphs 8.44-8.46 of the Inspector's report stated that:

'8.44 - The Supreme Court has told us in Dundee what "suitable" means and it has expressly rejected...that the concept relates to need and/or identified deficiencies in retail provision in the area in question; and it has expressly rejected the notion that "suitable" means that one should alter or reduce the proposal so as to fit onto an alternative site. The policy concerning the sequential approach as set out in the NPPF, and (to the extent that it is still relevant) the non-policy PG that accompanied PPS4, must be applied in a manner which complies with the legally binding case law on the meaning of the sequential approach. Plainly the case in question (Dundee) is of seminal importance.

8.45 - In summary it [The Dundee Decision] establishes [a] that if a site is not suitable for the commercial requirements of the developer in question then it is not a suitable site for the

purposes of the sequential approach; and [b] that in terms of the size of the alternative site, provided that the Applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site. These points although related are distinct. Although much was made of the fact that the Dundee case was a Scottish case the Supreme Court's decision applies in England (the Supreme Court is the Supreme Court for England too) as the High Court ruled in terms in the North Lincolnshire case in which it was read across and applied to the English sequential test then found in PPS4.'

8.46 - It is important to bear in mind that the sequential test as set out in NPPF [24] require applications for main town centre uses to be located in town centres and it then runs through the sequence, edge and then out-of-centre. This makes good the very simple point that what the sequential test seeks is to see whether the application i.e. what is proposed, can be accommodated on a town centre site. There is no suggestion here that the sequential test means to refer to anything other than the application proposal. So, Dundee clearly applies to the NPPF.'

- 4.8 The Secretary of State decision at paragraph 15 endorses the Inspector's Report and commentary regarding the application of the sequential test, confirming that:

'Furthermore, having regard to the arguments put forward by the Inspector at IR8.44-8.48, the Secretary of State agrees with his conclusion at IR8.48 that the sequential test relates entirely to the application proposal and whether it can be accommodated on an actual alternative site (e.g. a town centre site).'

- 4.9 The Dundee decision and subsequent Rushden Lakes, Crawley and Scunthorpe decisions make it clear that in the application of the sequential test, the term 'suitable' relates to the development/application proposed and not another form or scale of development which could be amended to fit onto a town centre or sequentially preferable site.

Flexibility – Format & Scale

- 4.10 NPPF paragraph 86 states that when undertaking a sequential test assessment, applicants and local planning authorities should demonstrate flexibility on issues such as format and scale. Planning Practice Guidance (PPG) provides further advice in relation to this and how it should be applied in the decision-making process, stating that:

'Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a 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.'

- 4.11 In considering the level of flexibility which must be applied, regard must be had to the Dundee decision, which we have already referred to. This decision confirms that the assessment should be:

'...directed to what the developer is proposing, not some other proposals which the planning authority might seek to substitute for it which for something less than that sought by the development.'

- 4.12 The Scunthorpe decision cited the Dundee decision with the Judge considering flexibility at paragraph 61, stating that:

'It is also important to mark that developers, and planning authorities, work in the real world. Marks & Spencer had assessed the only available town centre alternative to the Site, and had concluded that a development that was smaller than that proposed, or one with a more restricted range of goods, was neither commercially viable nor suitable for their commercial requirements'.

- 4.13 The Mansfield decision also considered the requirement to demonstrate flexibility. Whilst much of the judgement related to relevance of a proposed retail unit's occupier, paragraph 35 of the judgement confirmed:

'In my judgment, "suitable" and "available" generally mean "suitable" and "available" for the broad type of development which is proposed in the application by approximate size, type, and range of goods. This incorporates the requirement for flexibility in [24] NPPF, and excludes, generally, the identity and personal or corporate attitudes of an individual retailer.'

- 4.14 The Tollgate decision went further confirming that, in respect of flexibility, the test is whether or not a scheme that is 'closely similar to what is proposed' can be accommodated. Paragraph 12.3.20 of the Inspector's Report confirmed this:

'The sequential test therefore means that whilst a sequentially preferable site need not be capable of accommodating exactly the same as what is proposed, it must be capable of accommodating development which is closely similar to what is proposed.'

- 4.15 The Secretary of State in determining the Tollgate decision agreed with this approach stating at paragraph 13 of his decision that:

'The Secretary of State has carefully considered the Inspector's analysis at IR12.3.1-12.3.30. For the reasons given at IR12.3.23-12.3.26 he agrees with the Inspector that the propositions put forward by the Council and the Rule 6 parties in relation to the Vineyard Gate site would not be closely similar to the appeal scheme and cannot be considered available.'

- 4.16 These decisions were all based upon the wording of the sequential test within the 2012 version of the NPPF however, they remain relevant given the limited amendments to the relevant paragraphs within the 2018 NPPF (as amended in 2019). Nevertheless, the matter of suitability and the application of flexibility was considered through the Cribbs Causeway decision which post-dated the 2018 NPPF. The Secretary of State decision confirmed at paragraph 23, that in respect of a sequential site being considered:

'a broadly similar quantum of retail and leisure uses could still be accommodated on the site'
[our emphasis].

4.17 This decision was reached, citing the Inspector's Report which tackled this issue commenting that:

*'566. The meaning of the sequential test is a matter of law whereas how it is applied is a matter of judgement. The Framework and the PG indicate that when looking at the suitability of potential sequential sites, flexibility should be demonstrated on issues such as format and scale. **However, in Aldergate Properties¹² it was held that what this means is that the alternative site should be suitable for the broad type of development proposed in respect of the approximate size, type and range of goods.** This seems to me to be **subtly different from a consideration of whether the site would be closely similar, which was what was referred to by the Inspector in the Tollgate Village appeal decision.** I note that the Inspector in the Kingswood, Hull appeal did not think that closely similar provided sufficient flexibility.*

*604. ... For the reasons given it is considered that the site would **be suitable for the broad type of town centre development proposed** at The Mall in terms of approximate size, type and range of goods.'* **[our emphasis]**

4.18 The Cribbs Causeway decision is the most recent Secretary of State decision which has sought to tackle this issue. The Inspector's Report and the Secretary of State clearly favour *the 'broad type of development'* approach relied upon within the Mansfield Decision rather than the stricter interpretation of *'closely similar'* approach relied upon through the Tollgate Decision.

4.19 Given this most recent decision, when considering the requirement to demonstrate flexibility in relation to the format and scale of a development, this should seek to identify sites that can accommodate the 'broad type of development' albeit weighing this against the requirement to identify sites capable of accommodating the proposed development.

Flexibility – Disaggregation

4.20 The question of whether or not there is a requirement to consider disaggregation of a scheme through the application of the sequential test has been considered in some detail within the relevant case law and Secretary of State decisions. This matter has been the subject of much debate as the original NPPF (2012), its predecessors NPPF (2018 & 19) and PPG is silent on the matter, despite the fact that PPS4 (which the NPPF replaced) stated a specific requirement to consider the disaggregation of application proposals.

4.21 The Rushden Lakes Secretary of State decision was unequivocal in confirming that the NPPF did not require the consideration of the disaggregation of a proposed development, or part of a

¹² The Mansfield Decision

development, when considering flexibility. The Inspector's Report considers this matter at paragraph 8.47 and 8.51 which stated:

'8.47 The last sentence of NPPF [24] states that: "Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale." This contrasts strikingly with what was said previously in PPS4 in policy EC15.1 at (d) (iv) and 15.2 which contained an explicit requirement for disaggregation. There is no longer any such requirement stated in the NPPF. It is no answer to this to refer to the words "such as" in the last sentence of NPPF [24]. These words cannot be read so as to imply that a major, and extremely controversial, part of previously stated national policy lives on by implication in the NPPF. Had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF. If it had been intended to carry on with the requirement then all that would have been required is the addition of the word "disaggregation" at the end of NPPF [24].

8.51 There is no requirement to disaggregate...'

4.22 The Secretary of State's decision agreed with the Inspector with paragraph 16 of his decision letter stating that; *'he agrees with the Inspector that there is no requirement to disaggregate'.*

4.23 The question of disaggregation was further considered through the Braintree decision. The Inspector's Report here specifically considered whether or not the comments made within the Rushden Lakes decision were specific only to that case/site or whether they were relevant to the interpretation of the NPPF as a whole. The Inspector's Report stated that:

'449. Was that statement [relating to disaggregation] specific to the Rushden Lakes decision as the Council suggests, given the 'unique characteristics of that site and the proposed development in that case? It was not qualified in any way other than by reference to the two report paragraphs from which it derived. While one of these paragraphs dealt with specific aspects of the proposal, the other dealt with the intention of national policy in paragraph 24 of the Framework following the demise of PPS4. And that paragraph was not specific to the site or to the proposal in any way.

450. Moreover, the RL [Rushden Lakes] application was for a wide variety of uses including a home and garden centre, retail units, visitor centre, restaurants, boathouse, hotel, crèche and leisure club. It was described in summary as a mixed retail and leisure scheme. The retail element was of significant size, being some 31,502m² of retail units. If the Secretary of State had wanted to qualify his statement on disaggregation in any way, that could have been achieved very simply by the addition of words such as 'in this case'. Indeed, the variety of uses in the RL proposal and the fact that the proposal included retail units, rather than one large retail unit, would have afforded more rather than less opportunity for some disaggregation if that had been an aim.'

4.24 The Secretary of State agreed with the Inspector confirming at paragraph 9 of his decision that:

'The Secretary of State agrees with the Inspector's assessment regarding the sequential test at paragraph 24 of the Framework (IR443-467).'

- 4.25 The Scotch Corner decision re-affirmed this view with paragraph 11.7 of the Inspector's Report stating that:

'In carrying out the sequential test it is acknowledged that whilst Framework paragraph 24 indicates that applicants should demonstrate flexibility on issues such as format and scale, it does not require the applicant to disaggregate the scheme.'

- 4.26 Whilst the Secretary of State did not specifically deal with this matter in the Scotch Corner decision, paragraph 11 of his decision confirmed that, for the reasons set out at paragraphs 11.7-11.9, the application passed the sequential test.

- 4.27 In contrast to this, it is necessary to consider the Tollgate decision which suggested that there could, in some instances, be a requirement to consider the disaggregation of a scheme through the sequential test. In considering this matter, the Inspector's Report at paragraph 12.3.11 concluded that:

'In this case there is no evidence that the proposed format is necessary or fundamental to the proposal. Whilst the proposal is in outline, not a single retailer has been identified, and the size and location of units within the site has not been established and there is no defined timescale or phasing. It is difficult to conceive of a more open ended proposal. The parameters established by plans show a greater level of gross floor space than permission has been sought for. Most importantly the Appellants have themselves disaggregated within the appeal site with three distinct zones. DZ1 and DZ3 are some distance apart. In these circumstances disaggregation within the sequential test would be justified.'

- 4.28 The Secretary of State's decision does not provide any comment on this matter other than stating that he had carefully considered the Inspector's analysis at IR12.3.1-12.3.30. Nevertheless, it is clear that the matter was not key to the determination and sequential test analysis as, even allowing for disaggregation, none of the sites identified could be considered suitable and available.

- 4.29 In addition to this, it is important to note the specific comments made by the Inspector in coming to this conclusion. The Inspector's Report refers to the open-ended nature of the application proposal which itself included a significant degree of flexibility. However, the Inspector concludes that the most important matter in the Tollgate decision was the fact that the scheme itself was disaggregated, with the proposed development site comprising three development areas all of which were separated and located some distance apart. When considering the implications of the Tollgate decision and whether there is a requirement to consider the disaggregation of the application proposals in question, it is important to note the very specific set of circumstances with the Tollgate proposal.

- 4.30 The matter of disaggregation was also considered through an appeal decision at Kingswood in Hull¹³. As with the Tollgate decision, the Inspector concluded that, there was a requirement to consider the disaggregation of the appeal proposals being considered¹⁴. However, and as with the Tollgate decision, this conclusion was drawn on the basis of the very specific nature of the appeal proposals and importantly, the recently adopted development plan policy in respect of the sequential test.
- 4.31 The specific nature of the development proposals in the Kingswood case were for a scheme that sought a range of uses and a significant degree of flexibility in terms of its floorspace and formats with no identified occupiers for the retail units and no obvious reason why the floorspace must be delivered in a single retail terrace¹⁵. However, more importantly the relevant Development Plan policy, which set out the requirements of the sequential test, referred to a need to demonstrate that the development proposal *'could not be accommodated in more appropriate locations'* with the Inspector noting that the term 'locations' is in the plural. This in effect requires the consideration of disaggregation through the sequential test, through the consideration of multiple sites to accommodate the proposed development¹⁶.
- 4.32 Both the Tollgate decision and Kingswood appeal decision concluded that given the very specific nature of the development proposals, and/or the wording of the relevant Development Plan policy, there could be a requirement to consider disaggregation of a development scheme through the sequential test. Neither decision disagrees with or contradicts the Secretary of State's interpretation of policy through the Rushden Lakes, Braintree and Scotch Corner decisions.
- 4.33 Given this, it is helpful that the recent Cribbs Causeway decision tackled this very point. The Inspector's Report confirmed that:

*'567. There was debate at the inquiry about whether proposals should be split into different parts so that they can be accommodated on several town centre sites. **Whereas past retail policy and guidance has adopted a disaggregation approach this is not embodied in either the Framework or the PG as was confirmed by the Court of Appeal in Warners Retail.** The Secretary of State reached a similar conclusion in his decisions on Rushden Lakes, Scotch Corner and Honiton Road. **Whilst the Inspector in the Kingswood, Hull appeal decision did endorse a disaggregated approach this seems to have been influenced by a wording of the relevant policy and the availability of two allocated sites.***

*568. **In the Tollgate Village case the Inspector did consider that there was scope for disaggregating the proposals and spreading them onto different sites, even though ultimately such sites were found not to be available. However, the findings here were case specific and it is noted that they were not specifically endorsed by the Secretary of***

¹³ APP/V2004/W/17/3171115

¹⁴ Para. 52-57

¹⁵ Para. 28 and 29.

¹⁶ Para. 53

State in his decision. *As a general principle an approach that involves disaggregation does not seem to me to fit well with the Aldergate Properties or Warners Retail judgements referred to above. The town centre uses in the application proposals would comprise the retail and leisure uses and to divide them up would change the broad nature of the development in this case.* **[our emphasis]**

- 4.34 The later Leamington Spa decision again tackled the issue of disaggregation with the Inspector's Report stating that:

'29. The development proposed through this appeal does, however, have certain characteristics which lead me to question whether it is appropriate to consider the option of disaggregation in this case. This was the topic of much discussion at the inquiry. It is the agreed position between the parties that there is no requirement in current Government policy or guidance for disaggregation to be considered. Equally, however, there is no specific prohibition of disaggregation in either the Framework or the Planning Practice Guidance (PPG). Although I was referred to several decisions which have a bearing on this matter, made by both the Secretary of State (SoS) and by colleague Inspectors¹³, I find no clear consensus on this point.

30. There has, however, been a slight change to the wording governing the sequential test in the 2018 Framework, compared to that in the 2012 version of the Framework, extant at the time of most of the other decisions drawn to my attention. This change is the additional wording which has been added at the end of paragraph 87, to provide further clarification on the purpose of demonstrating flexibility on issues such as format and scale – namely 'so that opportunities to utilise suitable town centre or edge of centre sites are fully explored'. Taking this into account, combined with the absence of a specific requirement to consider the matter within the NPPF and PPG, there is no requirement to consider the disaggregation of a development proposal through the application of the sequential test unless the specific circumstances of the development proposal, site or development plan policy suggest otherwise.

38. Drawing all the above points together, I consider that disaggregation of the proposed scheme should not be ruled out in the particular circumstances of this case, so as to ensure that matters of flexibility regarding format and scale are properly addressed.'

- 4.35 As can be seen in the extracts from the Inspector's Report, the Inspector in the Leamington Spa case suggested that the potential disaggregation of a scheme should be considered noting the amended wording in the updated NPPF (2018) to require sequential assessments to 'fully explore' potentially sequentially preferable sites and citing the specific characteristics of the proposed development.
- 4.36 Whilst this conclusion somewhat contradicts the Cribbs Causeway decision, which was endorsed by the Secretary of State and took account of the amended wording of the NPPF, it is important to note in making his decision, the Inspector only considered the potential to disaggregate the

application proposals and did not actually require the test to be applied to a disaggregated version of the application proposals. Ultimately the Inspector concluded that the appeal proposals accorded with the sequential test despite the fact that the Inspector concluded that one sequentially preferable site could accommodate 2 of the 3 units proposed, stating at paragraph 38 that:

'Again, these retail units would only be able to accommodate the smaller of the 2 proposed non-food units, unless some amalgamation of units was considered. But even then, this development would not be able to accommodate the entire appeal proposal, nor would it be able to reasonably accommodate the proposed M&S Foodhall, even if all the units were to be combined. Moreover, it was made clear that this development has not been designed to accommodate food retailing and the service area would not be able to accommodate articulated vehicles. Whilst servicing by rigid vehicles would certainly be possible, this would be moving very much away from the type and form of development the appellant is seeking.'

4.37 Clearly despite the fact that the potential for disaggregation was considered through this appeal decision, the Inspector did not go so far as to actually require the disaggregation of the scheme to accord with the sequential test.

4.38 Finally, it is important to note that very recent Handforth Dean Secretary of State decisions relating to a called in planning appeal and called in planning applications, which post-date the Leamington Spa decision. From reviewing the Inspector's Report relating to these conjoined inquiries, it is clear that all parties and the Inspector agreed that there was no policy requirement to consider the disaggregation of any of the application/appeal proposals. Whilst not specifically endorsed in the Secretary of State decision letters, the Secretary of State did conclude that the applications/appeal accorded with the sequential test and that there were no sequentially preferable sites to accommodate the development proposed, despite the fact that the sequential assessments did not consider the disaggregation of the schemes, or part of them.

Availability

4.39 In respect of availability, NPPF paragraph 86 asks whether sequentially preferable sites are 'available' or 'expected to become available within a reasonable period'. The addition of 'expected to become available within a reasonable period' was added through amendments to the NPPF and published in 2018. As such, much of the case law and previous consideration on the point of availability is no longer relevant. Nevertheless, the NPPF or PPG do not qualify what is meant by these terms.

4.40 The Inspector's Report through Cribbs Causeway decision does not deal specifically with this point as it refers to the previous version of the NPPF (para 24) however the Secretary of State's decision refers to the amended wording and requirement to consider a 'reasonable period'. The Secretary of State decision at paragraph 24 confirms that:

'The Secretary of State has given careful consideration to the Inspector's analysis at IR592-602. He has paid particular attention to revised Framework paragraph 86, which makes clear

that the sequential test should consider whether sites are expected to become available within a reasonable period. For the reasons given at IR592-601, the Secretary of State agrees with the Inspector at IR601 that a realistic expectation is that the cleared site would be available by mid to late 2021. For the reasons given at IR602, and in paragraph 86 of the revised Framework, he further agrees with the Inspector that reasonable flexibility should be applied when considering the availability of sequential alternatives.'

- 4.41 The Secretary of State decision acknowledges the analysis of the Inspector and agrees that there is a requirement to demonstrate reasonable flexibility when considering the availability of sequential alternatives. As such, whilst the commentary within the Inspector's Report relates to paragraph 24 of the NPPF in relation to availability, a paragraph which has since been amended, it provides useful clarification, which the Secretary of State agreed with regarding how availability, including availability within a reasonable period, should be considered. The Inspector's confirms that:

*'593. **What an appropriate timescale would be is a matter of planning judgement** as is made plain in Lionbrook. In exercising that judgement it is important not to lose sight of the purpose of the sequential test in promoting a town centre first approach. It is appreciated that Lionbrook related to the period when the PPS 4 Practice Guidance was extant and was addressing the need to stem the leakage of retail spending outside of Rugby Borough. Nevertheless, the Framework was also in place and it included the same words in paragraph 24 that exist today. The Rushden Lakes appeal decision pointed out that paragraph 24 does not ask whether potential sites are likely to become available during the remainder of the plan period or over a period of some years. I agree that it does not endorse those parts of the former Practice Guidance. However, **that does not mean that there is no scope for flexibility or that the circumstances of the case may not be taken into account.**' [our emphasis]*

- 4.42 The Inspector's Report therefore confirms that what is an appropriate timescale for considering availability will depend on planning judgement and the particulars of the application proposals and any sequential sites being considered. In the specific circumstances of the Cribbs Causeway decision, considerations included;

- whether the sequential site would be available before the expiry of the planning permission sought;
- the level of policy support for the redevelopment of the sequential site (in this case the site was allocated for retail/leisure redevelopment); and
- recognition of the complexity of delivering large town centre sites.

- 4.43 It should be noted that the Cribbs Causeway scheme was a very large scheme of around 41,000m² of retail (A1) and other A class uses (A2-A5) along with a hotel, 1,500 car parking spaces and around 150 dwellings. Clearly the significance of this scheme, and the length of time required to

implement it, required the consideration required a greater level of flexibility to be applied when considering the availability of sites.

Case Law and Relevant Decisions Conclusions

- 4.44 Taking the decisions identified into account, whilst these provide useful guidance in terms of the application of the sequential test, it is clear that the matter of flexibility and suitability is primarily a matter of planning judgement for the local planning authority that should be considered in the context of the relevant circumstances relating to the development site and the development proposals.
- 4.45 In respect of the specific point on the need to consider disaggregation, the identified decisions clearly highlight that in determining whether this is required it is important that careful consideration is given to the specific circumstance of the development site and development proposal. However, what is clear is that there is no policy requirement to consider the disaggregation of schemes within the NPPF or PPG and this should only be considered where there are specific circumstances which require it.
- 4.46 In terms of availability, whether a site can be considered to be available or available within a reasonable period is a matter of planning judgement based upon the specifics of the proposed development and the complexities of the scheme.

Sequential Assessment Methodology

- 4.47 The following sets out the methodology and approach used in the application of the sequential test for the proposed development having regard to the requirements of the NPPF, Local Plan Part 2 Policy RTL1 and the various case law and decisions referred to earlier. The following matters are considered in turn;
- Locational Requirements and Area of Search;
 - Identification of Sites;
 - The Proposed Development – Site Requirements & Flexibility; and,
 - Availability.

Locational Requirements and Area of Search

- 4.48 As already highlighted, the NPPF requires the consideration of 'suitability' through the sequential test. The consideration of whether or not a site is suitable relates, in part, to whether or not a sequentially preferable site would be able to meet and serve the same market as the application proposals which will therefore influence the area of search for any sequential assessment. Put simply, if a site or location would fail to serve the same market as the application proposals/site then it cannot be considered suitable and therefore cannot be considered as a suitable and available sequentially preferable site through the sequential test.

- 4.49 PPG recognises this point and goes further at paragraph 011 of the 'Ensuring the vitality of town centres' chapter recognising that; *'certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations'*.
- 4.50 It is therefore necessary to consider the market that the proposed main town centre uses will serve.
- 4.51 The only defined centres within this general area is Swadlincote Town Centre along with the Local Centres of Woodville and Church Gresley, all of which are located within 1.5 miles of the application site. The sequential assessment does not consider those Local Centres located further afield; namely Castle Gresley and Newhall Local Centres as these are not readily accessible to the application site and locating the development within these local centres would serve a markedly different catchment area.
- 4.52 The sequential search focuses on sites located within the town/local centre boundaries before then considering sites that are located on the edge of (up to 300m from) and well connected to the centre boundary. The search then considers whether there are any out-of-centre sites (i.e. beyond 300m of the primary shopping area) that are accessible and well connected to the centre.

Identification of Sites

- 4.53 Sites requiring further consideration have been identified through site visits, map-based searches and a review of the South Derbyshire Local Plan Part 1 and 2 and the associated policies maps. A list of sites to be considered following this initial search was provided as part of the Retail Scoping Note (see Appendix 1) and subsequently agreed, with the addition of a further 2 sites to be considered.

The Proposed Development – Site Requirements and Flexibility

- 4.54 The sequential search considers sites which can accommodate the proposed local centre in its entirety given its intention to serve the local area and the proposed development. As case law and Secretary of State decisions have confirmed that there is no requirement to consider the disaggregation of schemes, sites will be considered where they are able to accommodate all three units/uses on a single site, or sites adjacent to each other.
- 4.55 In any case, the sequential site search already allows for some disaggregation given that it only considers sites capable of accommodating just the local centre uses, not the rest of the development.
- 4.56 Given this, the sequential site search is focused on those sites (and units) which could accommodate a foodstore of around 1,600m² (gross), a public house of circa 550m² and restaurant/fast food restaurant of circa 700m² with associated car parking. As highlighted on the Illustrative Masterplan, a development of this scale would need a site of around 1.4 hectares.
- 4.57 Taking into account the need to demonstrate flexibility, sites will be considered which could accommodate a development 20% larger and 20% smaller than that proposed. This is a significant

degree of flexibility and such an approach is taken recognising that no end occupier has been identified for any of the proposed units at this stage and noting that the application is submitted in outline.

- 4.58 In considering flexibility of format, given the limited scale of the proposed foodstore it is considered that only sites which can provide the sales area on a single floor should be considered given the significant trading difficulties of operating split-level stores (e.g. getting shopping trolleys between floors etc). In terms of the proposed public house and restaurant uses, these are proposed to be delivered across a single floor, although some staff accommodation may be provided on an upper floor of the public house. Nevertheless, in order to allow for an appropriate degree of flexibility it is accepted that some of the floorspace associated with the pub and restaurant could be provided on an upper floor.
- 4.59 In terms of car parking, it is accepted that this could potentially be provided on a site adjacent, or very close and easily accessible, to another site and still serve the proposed uses. As such, when considering the suitability of existing units only, which may be more restricted in terms of available space, we review the availability of car parking adjacent to or very close to the existing units. For sites with redevelopment potential, the car parking provision must be provided on site to be suitable to accommodate the proposed development.

Availability

- 4.60 In considering whether a site is available, the sequential assessment considers this on a site by site basis taking into account whether the site is in active use, whether it is being actively marketed and whether planning permission exists on the site for alternative uses/redevelopment.
- 4.61 In considering whether sites will become available within a 'reasonable period', again this is considered on a site-by-site basis having regard to the fact that the application site is available for development now with it being vacant and free from any built development although submitted in outline at this stage. As such, the site could come forward and be trading in early 2022. Any site that would not become available for development within this time period cannot be considered to be available within a 'reasonable period'.
- 4.62 Sites have been identified that could become available within a reasonable period following a site visit and desk-based search. For example, identifying sites or units which we know are likely to become vacant soon.

Site Assessments

- 4.63 As is set out in the scoping note (Appendix 1), the following sites have been identified as requiring further detailed consideration:
- Swadlincote Town Centre;
 - Local Plan Part 2 Potential Redevelopment Site 1 – Civic Centre, Civic Way;

- Local Plan Part 2 Potential Redevelopment Site 2 – Land between Midland Road / Belmont Street;
- Local Plan Part 2 Potential Redevelopment Site 3 – The Delph Block;
- Local Plan Part 2 Potential Redevelopment Site 4 – Sharpes Estate;
- Local Plan Part 2 Potential Redevelopment Site 5 – Land between West Street / Market Street; and,
- Land north of Hill Street/South of Russel Street.
- Swadlincote Town Centre (edge of centre);
 - Vacant Site to the west of Coppice Side and south east of the Pipeworks.
- Church Gresley Local Centre (edge of centre);
 - Gresley Football Club site, Moat Street;
 - Land at Church Street (Allocation H3); and,
 - Vacant land north of Kirkland Way and Penkridge Road.

4.64 In addition to these, the Council requested consideration of the following additional sites which are included within the assessment;

- Former South Derbyshire Council depot site, Darklands Road; and,
- Former TG Green Pottery site, John Street.

4.65 Each of these sites are considered in turn with detailed assessments provided for each at Appendix 2.

Site 1 – Local Plan Part 2 Potential Redevelopment Site 1 – Civic Centre, Civic Way

4.66 The site cannot be considered to be suitable nor available for development. The site is considerably larger than the proposed local centre and has a number of active uses on the site, all of which would need to be relocated, representing the largest potential town centre redevelopment site. Given this, it would need to be brought forward as a comprehensive mixed-use development which delivers appropriate replacement facilities on the site along with other uses, rather than coming forward on a piecemeal basis. Any piecemeal development of this site which would hamper any future redevelopment potential.

4.67 Given that no progress has been made towards securing a developer, or development partner, with the site understood to be in multiple landownerships, the potential redevelopment of the site is uncertain and would not come forward within an appropriate timescale even if some of the proposed local centre uses could be accommodated as part of a mixed-use development.

- 4.68 It is therefore clear that the site is unsuitable and unavailable to accommodate the proposed local centre uses and can therefore be discounted for the purpose of the sequential test.

Site 2 – Local Plan Part 2 Potential Redevelopment Site 2 – Land between Midland Road / Belmont Street;

- 4.69 At just 0.6ha the site too small to accommodate the proposed local centre even when including the current active uses on the site (bowling green and dental surgery) which would need to be relocated. As such the site cannot be considered suitable to accommodate the proposed development. In addition, whilst part of the site is currently vacant, the active uses on the rest of the site means that the site can also be discounted as being unavailable.

Site 3 – Local Plan Part 2 Potential Redevelopment Site 3 – The Delph Block;

- 4.70 This site is not considered to be suitable nor available to accommodate the proposed development. The site is too small to accommodate the proposed local centre uses providing just 21% of the required site area. In addition, vehicular access into the site is very limited owing to the vehicle restrictions on Market Street which permits only pedestrian access between 10am and 4pm and as such it would be unsuitable to accommodate any car parking or appropriate delivery arrangements.
- 4.71 In addition, much of this site is not available with the majority of the existing units being occupied and no. 4 High Street have recently been refurbished and occupied by retail uses on the ground floor with residential apartments above.

Site 4 – Local Plan Part 2 Potential Redevelopment Site 4 – Sharpes Estate;

- 4.72 The site is not considered to be suitable or available to accommodate the local centre uses. Although the identified site would be of a sufficient size to accommodate the proposed development, the site is predominantly in active use, including part of the site having recently been redeveloped to create small employment units. As such any potentially available part of the site that could be developed within an appropriate timeframe would be too small to accommodate the proposed local centre.

Site 5 – Local Plan Part 2 Potential Redevelopment Site 5 – Land between West Street / Market Street;

- 4.73 This site, at just 0.3ha, is far too small to accommodate the proposed local centre uses and its potential suitability and availability is hampered further by a range of active uses across the site and the planned conversion of the former Methodist church and hall to residential use. Whilst the former co-op building is being actively marketed, this provides just 70m² of floorspace and is clearly too small to accommodate any of the proposed uses. As such, the site is both unsuitable and unavailable to accommodate the proposed local centre.

Site 6 – Land north of Hill Street/South of Russel Street

- 4.74 Construction of a residential development on this site has recently commenced and therefore the site cannot be considered available. In addition, the site, at just 0.2ha is far too small to accommodate the proposed local centre uses.

Site 7 – Vacant Site to the west of Coppice Side and south east of the Pipeworks

- 4.75 This vacant out-of-centre site provides just 0.4ha of potential developable area and is therefore far too small to accommodate the proposed local centre uses. In addition, a live planning application for the residential development of the site is currently being considered with an identified housebuilder and as such the site is not considered available.

Site 8 – Gresley Football Club site, Moat Street

- 4.76 This edge-of-centre site is not considered to be a suitable and available as it forms part of a wider allocation, requiring the delivery of a replacement facility to be provided on an alternative site before the site could come forward for development. Given the lack of progress with delivering a replacement site, this site will not come forward within an appropriate timescale to accommodate the proposed development. In addition, at just 0.8ha the site is too small to accommodate the proposed local centre.

Site 9 – Land at Church Street (Allocation H3)

- 4.77 This large edge of centre site is not considered to be suitable and available to accommodate the proposed site given the need for the comprehensive development of the large site and the existence of a planning permission for residential uses suggesting that the site is not available for the proposed local centre uses. In addition, this site is located away from the application site and the Woodville-Swadlincote Regeneration Route and therefore would serve a markedly different market than the application site.

Site 10 – Vacant land north of Kirkland Way and Penkridge Road

- 4.78 This edge-of-centre provides just 0.5ha of potential developable area and as such is too small to accommodate the proposed local centre. In addition, access to the site is very limited with access only available via a private road 'Common Side' meaning that any potential improvements are unlikely to be able to be available without securing 3rd party land and as such it is questionable whether the site would be available. The site therefore cannot be considered to be a suitable and available sequentially preferable site.

Site 11 – Former South Derbyshire Council depot site, Darklands Road

- 4.79 The site is too small to accommodate the proposed local centre providing a developable area 33% smaller than that required. In addition, planning permission was recently granted for the redevelopment of the site for a mix of uses including Marston's pub/restaurant and KFC, with both occupiers understood of have committed to occupying the proposed development. As such the site is clearly unavailable to accommodate the proposed development, whilst the public house and

restaurant are clearly unavailable to accommodate any potential occupiers given the commitment of Marston's and KFC.

Site 12 – Former TG Green Pottery site, John Street

4.80 The site is not considered to be a sequentially preferable site as the site is in an out-of-centre location and is not well connected to any defined centre. The edge of the site is approximately 800m (walking distance) from Church Gresley Local Centre. In comparison the edge of the application site is just 380m from Woodville Local Centre and therefore it is clear that the application site is better connected and related to a town centre.

4.81 Nevertheless, given the scale of the site it is not considered to be suitable to accommodate the proposed local centre.

Sequential Assessment Conclusions

4.82 A detailed sequential assessment has been prepared and a number of sites assessed located within, on the edge of and close to Swadlincote town centre and defined local centres. The sites have been assessed and no site is considered to be suitable **and** available to accommodate the proposed main town centre uses therefore satisfying the sequential test as set out at NPPF para.86 and Local Plan Part 2 Policy RTL1.

5. RETAIL IMPACT ASSESSMENT METHODOLOGY

- 5.1 This section sets out the methodology used in assessing the retail impact of the proposed development noting the guidance contained within the PPG in respect of such assessments. A draft methodology was submitted to, and agreed with, the local planning authority through pre-application discussions. A copy of the note is provided at Appendix 1.

Base Data

- 5.2 The following sets out the data which has been used to undertake the quantitative retail impact assessment. Given the limited changes to the retail offer in and around Swadlincote in recent years data included within the 2015 Swadlincote Town Centre Retail and Leisure Study (the 'Retail Study') has been used as basis for the assessment although updated in line with up-to-date growth rates etc.
- 5.3 The **Study Area** for the assessment is Zones A-H as defined in the Retail Study for ease of comparison between the assessment and the Retail Study.
- 5.4 The **Primary Catchment Area** relied upon for the assessment is Zones A-C and G, noting existing shopping patterns and the scale of the proposed development.
- 5.5 The **Price Base** for the assessment is 2013 to accord with the Retail Study.
- 5.6 The **Design Year** (i.e. the year at which impact will be considered) for the impact assessment will be 2024 taking into account guidance within the PPG. This is used as it is the earliest point at which the proposed development could in theory be in its 2nd full calendar year or trading (assuming an opening in early 2022 following a reserved matters submission).
- 5.7 **Population** data is taken from Table 1 of Appendix 5 of the Retail Study which provides population data for 2015, 2020 and 2025. As the design year and base year falls outside these years, population data for 2016-2019 and 2021-2024 have been calculated on a pro-rate basis, assuming the same level of annual growth between the years where population data is provided.
- 5.8 **Base Expenditure** data (at 2015) has been taken from Table 2A (convenience) and Table 7 (comparison) of Appendix 5 of the Retail Study. As this base data excludes SFT, this has then been adjusted to include SFT relying upon the SFT allowance (+2.8%) as set out in former Retail Planner Briefing Note 12.1 Appendix 3. SFT has then been removed using the up-to-date estimates as provided at Figure 5 (Appendix 3) of Experian Retail Planner Briefing Note 16. Growth rates are then applied from 2015 using those growth rates 'ex. SFT adjusted for sales via stores' as set out in Figure 6 (Appendix 3) of Experian Retail Planner Briefing Note 16. This exercise has been done to ensure that the base expenditure data is updated to allow for the most up-to-date forecasts.
- 5.9 **Existing Shopping Pattern** data has been calculated using taken from Table 3 (convenience) and Table 27 (comparison) of Appendix 5 of the Retail Study.

- 5.10 An allowance for **Inflow** (i.e. expenditure drawn from outside the Study Area) has been applied at 6.6% for comparison goods turnover in Swadlincote only in line with the approach used in the Retail Study.

Retail Commitments

- 5.11 The assessment makes an allowance for retail commitments within the Primary Catchment Area. The only retail commitments identified is the Lidl store at Belmont Street as identified in the Retail Study which, whilst currently trading, was not trading at the time of the household survey as the replacement store was under construction. As such, the store has been built into the assessment as a commitment.
- 5.12 The turnover of the store has been calculated using floorspace data presented in Table 6d (Appendix 5) of the Retail Study multiplied by the average sales density for a Lidl store (including VAT) as derived from GlobalData's Convenience and Comparison Goods Sales Densities of Major Grocers (2018) converted to 2013 prices using price indices data set out at Appendix 4b of the Experian Retail Planner Briefing Note 16. The turnover of the store allows for floorspace efficiencies between 2019 and the design year (2024) as set out at Figures 4a and 4b of the Retail Planner Briefing Note 16.
- 5.13 In the absence of any impact assessment for the Lidl store, the trade diversion patterns of the store have been estimated taking account of the existing shopping pattern data.
- 5.14 No additional retail commitments have been identified within the local area which would materially affect local convenience goods shopping patterns since the Retail Study household survey was carried out.

Turnover of Proposed Development

- 5.15 As no end occupier has been secured for the proposed foodstore, the likely turnover has been calculated relying upon Pegasus estimates relating to net floorspace, floorspace split and sales densities based upon experience of dealing with similar applications.
- 5.16 A gross to net floorspace ratio of 80% has been used giving a net floorspace figure of 1,280m² for the purposes of calculating the likely turnover of the development. This gross to net ratio is higher than is commonly achieved by foodstores however it has been used to assess a worst-case scenario and therefore represents a robust approach to the consideration of impact.
- 5.17 To allow flexibility for any end occupier, a flexible convenience and comparison goods floorspace split has been applied. The Assessment assumes that a maximum of 90% of the net floorspace is used for the sale and display of convenience goods and a maximum of 25% of the net floorspace is used for the sale and display of comparison goods. Whilst this results in the assessment considering the impact/turnover of a larger store than is actually proposed (i.e. 115% of the proposed net floorspace), this would ensure that, in the event that planning permission is granted,

any planning condition that restricts the maximum level of net convenience and comparison floorspace has some in-built flexibility so that it meets a number of foodstore operators business models.

- 5.18 As no end occupier has been identified, an average sales density of the 'big 4' foodstore retailers (Tesco, Morrisons, Sainsbury's and ASDA) has been used to calculate an average sales density for the proposed foodstore as a worst-case scenario noting that the 'big 4' generally achieve the highest sales densities. This approach to calculating sales densities is already established within the Retail Study where it is used to calculate quantitative need for new retail floorspace (see Table 7.3). Rather than use the average sales density figure presented within the Retail Study, we have relied upon up-to-date sales density information as provided by GlobalData (formerly known as Verdict Retail) through their Convenience and Comparison Goods Sales Densities of Major Grocers (2018) data. As the GlobalData data is presented at a 2018 price base, this has been converted to 2013 prices using the price indices data in the Experian Retail Planner Briefing Note 16 (Appendix 4b).

Trade Diversion/Impact

- 5.19 Trade diversion and impact has been calculated on a goods basis (i.e. convenience and comparison goods) and then a cumulative impact figure presented taking into account the impact on each destination's total turnover, combined with the impact of the identified retail commitment. Trade diversion patterns are presented on a Study Area basis.

Health Check

- 5.20 An up-to-date health check of Swadlincote town centre and Woodville local centre has been prepared and submitted (see Section 5). The health checks have been prepared in line with the guidance set out within the PPG and build upon the health checks prepared as part of previous Council Retail Studies and the vacant unit counts provided within the Council's Annual Monitoring Report.

6. HEALTH CHECKS

- 6.1 Before moving on to consider the likely impact of the proposed local centre, it is necessary to assess the current vitality and viability of the nearest town centre to the application site to understand how the centre may be impacted by the proposed development. As such, the following provides 'health check' of Swadlincote Town Centre and Woodville Local Centre drawing upon a range of data sources and a site visit in June 2019, taking into account the guidance on preparing such assessment as set out in the PPG.

Swadlincote Town Centre

- 6.2 Swadlincote town centre is the largest retail/commercial centre in South Derbyshire district providing an important local retail and service hub for local residents and the wider rural area. The designated town centre covers a wide area centred around High Street and extending northwards towards with A514. The nearest 'higher order' centre to the town centre is Burton-on-Trent located approximately 5 miles (driving distance) to the north west.

Accessibility

- 6.3 The town centre is well served by public transport with Swadlincote Bus Station located within the town centre boundary providing regular bus services around Swadlincote and beyond, including services to Burton-upon-Trent, Derby, Ashby and Leicester. There are good pedestrian links with the surrounding residential area whilst the high street benefits from being pedestrianised between the hours of 10am-4pm every day.
- 6.4 Car parking within the town centre is free and a range of long and short stay car parks are available around the town centre. The Pipeworks, along with the Morrisons and Sainsbury's stores provide further free car parking in and around the town centre although their use is restricted to customers only and is time limited to 3 hours for The Pipeworks and Sainsbury's and 2 hours for Morrisons.

State of Town Centre Environmental Quality

- 6.5 The environmental quality of the town centre has clearly benefitted from significant investment in recent years across a multitude of different projects and developments.
- 6.6 The pedestrianised high street provides a pleasant and attractive shopping street with mature trees and well-maintained street furniture whilst the Delph, at the top of High Street, was repaved and new tree planting/street furniture introduced in 2011, and recently repaired, creating an attractive and useable public square.
- 6.7 The buildings in the town centre generally appear in good repair with a number of historic buildings with period shop frontages along High Street, and in the wider town centre, providing an interesting and attractive environment for visitors. Indeed, much of the town centre designated as a conservation area. Some individual buildings within the town centre detract from the overall town centre environmental quality particularly those buildings viewed from Civic Way which is dominated

by the rear of late 1970s/early 1980s buildings, service yards and surface car parks which do not provide an attractive street scene for those driving through/past the town centre.

6.8 More recent development in the town is of a high quality and helps to enhance the overall environmental quality of the town centre including the Morrison's store (2000s) and The Pipeworks (2010's) developments. In addition, a number of new residential developments have been delivered in and around the town centre, replacing former industrial and retail space.

6.9 In more recent times, a number of buildings in the town centre have benefitted from investment and improvements through the Swadlincote Townscape Heritage Scheme, which has delivered frontage improvements and internal refurbishments of a number of existing buildings in the town centre. This has included refurbishments to previously vacant buildings along High Street, Midland Road and West Street, all of which had previously been in a poor state of repair. The Townscape scheme also has helped to deliver the renovation of the Diana, Princess of Wales, Memorial Garden and public realm improvements along West Street.

Figure 1 – Existing townscape around The Delph and High Street



6.10 Overall, the environmental quality of the town centre is very good and has clearly benefitted from significant investment in recent years making the town centre an attractive and pleasant place to visit.

Diversity of Uses

6.11 An up-to-date audit of the diversity of uses in the town centre was carried out in June 2019 to understand the current makeup of uses in the town centre based upon the most up-to-date Experian GOAD survey (November 2016). At the outset it is important to note that the area surveyed is that identified by Experian GOAD as 'Swadlincote town centre' which does not match the adopted town centre boundary as defined in the Local Plan Part 2. The GOAD boundary has been relied upon to allow direct comparison with national average figures produced by GOAD, to

compare how the diversity of uses has changed over time and to provide an accurate representation of the number of units in the centre.

- 6.12 Table 1 sets out the diversity of uses (by unit type) based on the audit of the town centre as of June 2019.

Table 1 - Diversity of Uses in Swadlincote Town Centre (June 2019)

Use	Number of Units	Proportion of Units	UK Average
Convenience	14	8.8%	9.2%
Comparison	52	32.5%	29.7%
Retail Service	36	22.5%	14.9%
Leisure Services	30	18.6%	24.3%
Financial & Business Services	19	12.4%	10.0%
Vacant	9	5.6%	11.6%
Total	156	100%	

- 6.13 As can be seen in Table 1, the town centre has strong mix of uses, with the proportion of comparison retail units above the national average and convenience units broadly in line with the national average. The town centre has a significantly higher proportion of retail service units, which includes uses such as opticians, dry cleaners etc, than the national average whilst the leisure service provision (e.g. bars/restaurants, hotels, sports facilities) is below the national average. This highlights Swadlincote town centre's principal role as a retail and service centre. However, it should be noted that this excludes The Pipework's development which clearly has a significant leisure offer in terms of restaurants and a cinema.
- 6.14 It is also necessary to consider the amount of floorspace dedicated to each type of use noting that the proportion of units only forms part of the offer of the centre. Table 2 sets out the mix of floorspace as of June 2019 in Swadlincote Town Centre.

Table 2 - Diversity of Floorspace in Swadlincote Town Centre (June 2019)

Use	Floorspace (m ²)	Proportion of Floorspace	UK Average
Convenience	15,110	40.5%	15.4%
Comparison	11,100	29.7%	34.0%
Retail Service	3,630	9.7%	6.9%
Leisure Services	4,230	11.3%	25.4%
Financial & Business Services	2,230	6.0%	7.5%
Vacant	1,040	2.8%	10.2%
Total	37,340	100%	

- 6.15 As can be seen in Table 2, the proportion of convenience floorspace in the town centre is significantly greater than the national average although this is unsurprising given the presence of two major superstores and a Lidl store in the centre. The level of comparison floorspace is below the UK average recognising that the majority of comparison goods units in the town centre are fairly small albeit noting that this excludes the larger floorplate units provided at The Pipeworks development.
- 6.16 Whilst the strong mix of uses within the town centre, both in terms of units and floorspace is representative of a vital and viable centre, it is necessary to consider how the diversity of uses has

changed over time based on our up-to-date survey (2019) and previous surveys carried out by GOAD (2016) and in support of the Swadlincote Town Centre Retail Study (2015 and 2010). The ability to compare how this has changed over time is limited by the fact that the floorspace and unit counts presented in the Retail Study (2015) only cover the units/floorspace within the town centre boundary as defined through the 1998 Local Plan and therefore differs to that surveyed by GOAD, our up-to-date survey and the current town centre boundary. Nevertheless, from review the plans provided in the Retail Study, it appears that the main differences in the surveyed areas relate to the exclusion of Sainsbury's and the retail park at Belmont Street and as such it is possible to amend the findings to include these units in the counts for the 2015 and 2010 data. The full data in respect of the diversity of uses and how this has changed over time is presented at Appendix 3 and summarised at Table 3.

Table 3 - Swadlincote Town Centre Change in Proportion of Units 2010-2019

Use	Proportion of Units (%)			
	2010	2015	2016	2019
Convenience	9.9%	8.6%	8.4%	8.7%
Comparison	30.5%	27.8%	31.1%	32.3%
Retail Service	19.9%	22.8%	21.6%	22.4%
Leisure Services	14.6%	16.0%	19.8%	18.6%
Financial & Business Services	15.9%	9.3%	10.2%	12.4%
Vacant	9.3%	15.4%	9.0%	5.6%

6.17 As can be seen, there has been limited change in the proportion of retail (comparison and convenience) units in the town centre since 2010 although there has been a slight increase in the number of comparison goods. This is a positive sign for the town centre given the significant changes in the retail market in recent years which has generally seen the proportion of traditional retail units decline in favour of other alternative uses. It is particularly notable that the proportion of comparison goods units in the town centre has notably increased between 2015 and 2019 (increase of 4.7% of units or 7 units) suggesting a growing confidence in the retail market in the town centre. This will have been further enhanced through the opening of The Pipeworks development, the retail units of which are not included within this count.

6.18 Other key principal changes between 2010 and 2019 have been the significant increase in leisure services and a reduction in financial and businesses services although the level of both has remained fairly consistent between 2010 and 2016.

6.19 Overall it is considered that the town centre has a strong mix of uses and floorspace providing a comprehensive retail, service and leisure offer that has improved in recent years.

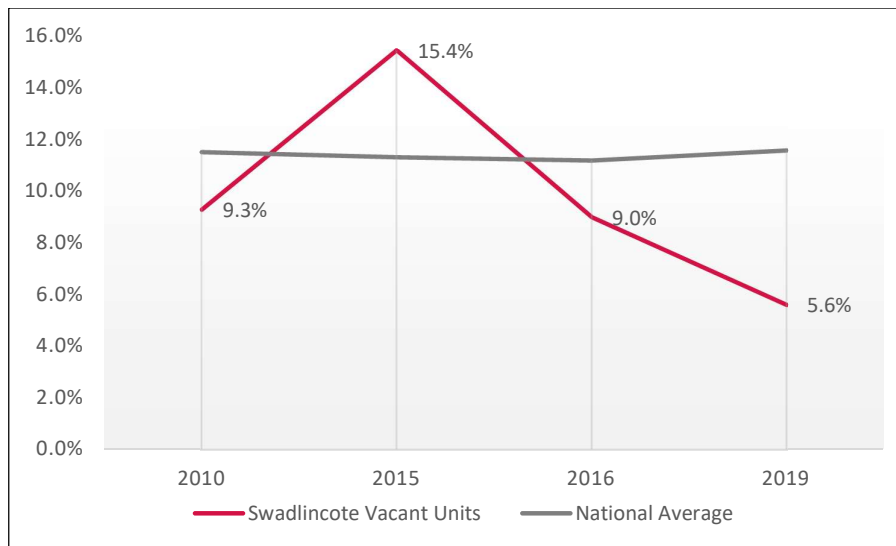
Proportion of Vacant Street Level Property

6.20 As part of the audit of units, we have reviewed vacant properties in the town centre to allow a comparison against national average vacancy rates and previous recorded vacancy rates.

6.21 As set out in Table 3, as of June 2019 there were a total of 9 vacant units within the town centre amounting to just 5.6% of the units within the town centre, which is less than half the national average of 11.6%. The total vacant floorspace within the town centre is approximately 1,040m² or 2.8% of the total floorspace within the town centre, compared to a national average of 10.2%. Clearly this extremely low vacancy rate is a key strength of the town centre and indicator of its vitality and viability. The average size of vacant units within the town centre is 115m² although this is inflated by the vacant former Lounge Bar (formerly the Empire Cinema) which is a larger than average unit.

6.22 Table 1 at Appendix 3 sets how the diversity of uses, including vacancies, has changed over time back to 2010. Figure 2 illustrates how the number of vacant units has changed over time.

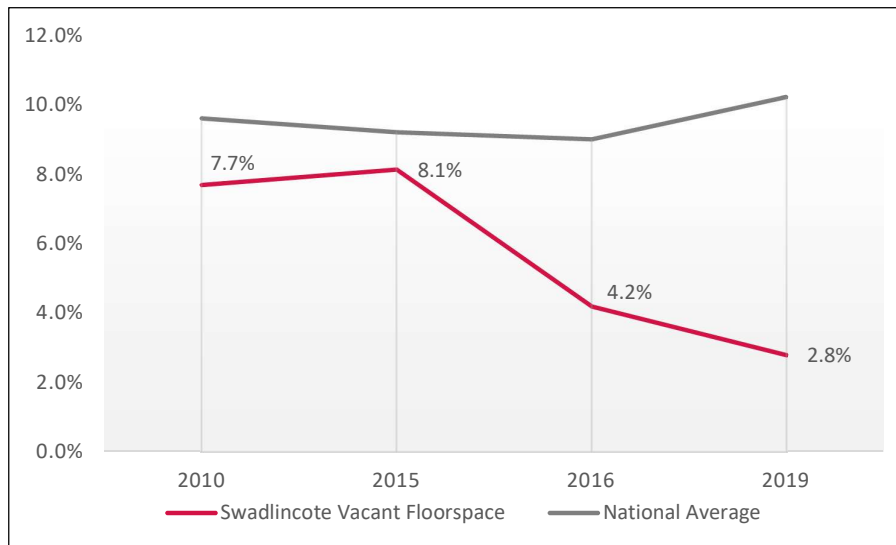
Figure 2 - Swadlincote Town Centre Vacant Units 2010-2019



6.23 As can be seen in Figure 2, in 2010 vacancy rates within the town centre were below national averages although there was a rise in vacancy rates between 2010 and 2015 with an increase in 11 vacant units. Since 2015 vacancy rates have fallen considerably, reducing by 10 units between 2015 and 2016 and a further 6 units between 2016 and 2019 with vacancy rates now falling significantly below national averages.

6.24 This overall fall in vacant units is replicated in terms of the level of vacant floorspace within the town centre as illustrated in Figure 3 and set out at Table 2 of Appendix 3. However, unlike the number of units, the level of vacant floorspace within the town centre has remained consistently below the national average between 2010 and 2019. There was a slight increase in vacant floorspace between 2010 and 2015 (circa 554m²) suggesting that the increase in vacant units over this time were predominantly smaller units, however during this time the former Kwik Save unit on Alexandra Road was demolished and redeveloped, removing the largest vacant unit identified in 2010.

Figure 3 - Swadlincote Town Centre Vacant Floorspace 2010-2019



- 6.25 Nevertheless, the level of vacant floorspace within the town centre has decreased since 2010/2015 reducing by 884m² between 2015 and 2016 and a further 623m² through to 2019.
- 6.26 Overall comparing vacancy rates over time show a clear trend for reducing vacant units and floorspace within the town centre with the figures significantly below the national averages.
- 6.27 The current vacant units are evenly distributed across the town centre with no real concentration of vacant units. 4 of the retail units are located on High Street with a further 3 on West street and single vacancies on Midland Road and the Delph. Of these vacant units, only 2 were vacant (or part vacant) at the time of the GOAD survey (November 2016). These are the Bank House (nos 22) Midland Road, a former estate agent now understood to be owned by the District Council and a small part of a what was once a single unit at 10 West Street, with the majority of this unit having been occupied by a coffee shop. A map showing the distribution of vacant units is provided at Appendix 4.
- 6.28 Given that there is no concentration of units, and only 2 of the units have been vacant for more than 2 years, the majority of the vacant units are thought to be as a result of the natural turnover of units which is to be expected in any retail centre. Indeed, it appears that a number of the vacant units are to be shortly occupied with 10 West Street benefiting from planning permission to be used as a fish and chip shop (Use Class A5)¹⁷ and 26b High Street (formerly Cashino Gaming Centre) the subject of a gambling licence application to be used for bingo uses. This suggests that there is no issue of attracting new occupiers to the town centre.

¹⁷ 9/2018/0472

Figure 4 - Existing vacant units (former Co-op and 26b High Street)



Commercial Yields on non-domestic property

- 6.29 Publicly available data on commercial yields for non-domestic property is limited since the Valuation Office Agency (VOA) stopped publishing such data within their 'Property Market Reports'. The last Property Market Report which provided such data (July 2008), confirmed that Swadlincote was achieving an average yield on retail properties of 7% in 2008, having steadily reduced from 10%+ in 2004. This could be compared to a yield of 5% for Derby, 7% for Ashby and 6.75% for Burton-on-Trent.
- 6.30 To review more up-to-date information, we have reviewed actual sale prices and the yield achieved for commercial/retail units within Swadlincote Town Centre over the last 5 years. This has been derived from previous auction sales of retail properties in the town centre¹⁸ and is summarised in Table 4.

Table 4 - Commercial Yields Achieved through Auction Sales Since 2013

Unit	Sale Date	Yield
43 High Street (B&M)	17/10/17	6.83%
25-31 High Street	10/10/16	10.05%
15-17 High Street (Boots)	03/12/13	7.91%
Average		8.26%

- 6.31 As can be seen in Table 4, there are only three sales at auction within Swadlincote Town Centre which achieved an average yield of 8.26%. Nevertheless, it is noted that this is a limited sample size and therefore an average higher than the previously reported 7% does not necessarily suggest that yield levels have actually worsened in the town centre. Nevertheless, the most recent yield achieved at 43 High Street (6.83%) is a positive given the considerable amount of economic change

¹⁸ Data taken from Allsop Property Auctions: <https://www.auction.co.uk/commercial/pastPropSearch.asp>

since 2008 and the ongoing challenges of the retail market. As such this suggests that the town centre remains an attractive centre for investment.

Commercial Rent

- 6.32 The 2015 retail study provided details of the rental and sales values of properties being marketed at the time of the study and as such for comparison we have undertaken the same process based on published marketing details, with the findings summarised in Table 5.

Table 5 – Swadlincote Town Centre Rental and Sales values in Marketed Properties.

Unit – to let	Size (m²)	Rent per annum	Rent per m²	Type	Agent
10 West Street	67	£9,750	£146	Retail	Rushton Hickman
Former Co-op. West Street	142	8,500	£60	Retail	Johnson Fellows
65 High Street (under offer)	172	£16,950	£99	Retail	Rushton Hickman
Hepworth Retail Park	241	£18,000	£75	Retail / Restaurant	Innes England
Unit – for sale		Price	Price per m²		
64-66 High Street	71	£85,000	£1,197	Retail	Salloway
3A and 3B West Street	76	£125,000	£1,645	Retail	Salloway
65 High Street (under offer)	172	£215,000	£1,250	Retail	Rushton Hickman
1 West Street	306	£300,000	£980	Retail	Salloway
21 West Street	602	£225,000	£374	Leisure	Rushton Hickman

- 6.33 The average rental value of those 4 units being actively marketed equates to £95 per m², lower than the average identified in the 2015 Retail Study (£137 per m²). However, it should be noted that this is a very small sample of retail units and therefore is not necessarily representative of rental levels within Swadlincote and how they have changed over time. Nevertheless, it is noted that the asking price for no. 65 High Street, which is again being marketed for sale, has increased by £30,000 from 2015 to 2019.
- 6.34 As it is understood that the District Council are in the process of undertaking benchmarking survey work in relation to the town centre, we have not sought to contact local agents to gain more evidence in relation to rental rates at the risk that this may hamper efforts by the Council, and their consultants, to obtain such information.

Customers' Views and Behaviour

- 6.35 The 2015 Retail Study deals with customer views and behaviour in some detail and remains the most up-to-date information in respect of this.

Retailer Representation and Intentions to Change Representation

- 6.36 Swadlincote town centre has a strong mix of national and independent retailers, plus further national multiple retailers located at the Pipeworks development, complemented by Swadlincote Market which operates 3 days a week.

- 6.37 As noted in the Retail Study, national multiple retailers can help to anchor and create footfall in town centres. Whilst the town centre has not attracted any new 'major comparison retailers' as identified by GOAD¹⁹ since 2016, it has retained all of the retailers (Clintons, Boots, Clarks and Superdrug) previously represented in the town centre plus retained the Argos store at The Pipeworks highlighting the resilience of the town centre.

Figure 5 – Existing Retailer Representation



- 6.38 In addition, a number of other national multiple retailers are represented in the town centre including Peacocks, B&M Bargains, Hallmark, Card Factory, Shoe Zone and Poundstretcher, all of which contribute to generating footfall and supporting the vitality and viability of the centre.
- 6.39 Given the limited number of vacancies within the town centre there are relatively few opportunities for new entrants into the town centre in terms of existing units. Nevertheless, there are some development opportunities within and on the edge of the primary shopping area which could deliver new retail floorspace as part of a larger mixed-use development.

Pedestrian Flows

- 6.40 Pedestrian Flow data is produced in the 2015 Retail Study highlighting the greatest footfall areas we along the central parts of High Street which match our observations made during our site visit.

Perception of Safety and Occurrence of Crime

- 6.41 The household and in-street survey did not highlight any concerns in respect of safety or occurrence of crime within Swadlincote town centre whilst the 2015 Retail Study sets out the various measures that are in place to reduce the opportunity for and fear of crime.

¹⁹ GOAD recognises 27 major comparison goods retailers as being the most likely to improve the consumer appeal of a centre.

- 6.42 In terms of the actual occurrence of crime²⁰, the following crimes were recorded between May 2018 and April 2019:

Crime type	Total Crimes Report	Proportion of Crimes
Anti-social behaviour	85	35.7%
Shoplifting	42	17.6%
Violence and sexual offences	38	16.0%
Criminal damage and arson	19	8.0%
Other theft	19	8.0%
Burglary	13	5.5%
Public order	11	4.6%
Theft from the person	5	2.1%
Vehicle crime	3	1.3%
Bicycle theft	2	0.8%
Drugs	1	0.4%
Total	238	100%

- 6.43 This data highlights that a total of 238 crimes were reported in the town centre over a period of 12 months, an average of around 20 crimes per month. Given the concentration of commercial property and public houses, it is unsurprising that the most common offences recorded were violent offences, anti-social behaviour and shoplifting. The level of reported crime is not considered uncommon for a town centre of this size and overall the perception and occurrence of crime in the town centre is not a factor that is adversely affecting the vitality and viability of the town centre.

Swadlincote Town Centre Conclusions

- 6.44 In summary it is considered that the town centre is vital and viable serving an important role as a local retail and service destination for Swadlincote and the surrounding rural area. The town centre has benefitted from significant investment in recent years which have helped to bring vacant units back into use and attract new retail and other occupiers to the centre. The town centres very low vacancy rate, less than half the national average, is a significant sign of the centre's vitality and viability.

Woodville Local Centre

- 6.45 Woodville local centre is a small parade of loosely connected retail and commercial units interspersed by residential properties fronting along High Street (A511). The boundary of the centre is not defined in the Local Plan although its approximate location is. As such, we have sought to define the local centre boundary taking into account the mix and concentration of uses and is illustrated on the diversity of uses plan at Appendix 5 for ease of reference. This boundary has then been used in assessing the vitality and viability of the centre.

Accessibility

- 6.46 The local centre is well served by local bus routes with services running along High Street (towards Ashby) and other services running to the north along Swadlincote Road/Hartsthorpe Road (A514)

²⁰ <https://www.police.uk/derbyshire>

towards Melbourne and Derby. Pedestrian access is provided by footpaths either side of High Street although there are a limited number of dedicated crossing points, particularly towards the south east of the centre.

- 6.47 Parking in the centre is available through a free car park on Blacksmith's Lane along with small car parks serving specific units in the centre including Tesco Express and public houses. A small number of on-street parking spaces are available which are time limited to 40 minutes.

State of Environmental Quality

- 6.48 The local centre is made up of a range of building types and ages and are generally well maintained with a range of active ground floor uses. Nevertheless, given that the centre straddles a busy A road which restricts the potential for traffic calming measures and introduction of street furniture and does detract from the environmental quality of the centre to a degree.

Figure 6 - Woodville townscape



Diversity of Uses

- 6.49 An audit of the diversity of uses in the local centre was carried out in June 2019 to understand the current makeup of uses, the findings of which are presented in Table 6 whilst a plan showing the location of these is provided at Appendix 5.

Table 6 - Woodville Local Centre Diversity of Uses 2019

Use	Number of Units	Proportion of Units	UK Average
Convenience	1	3.4%	9.2%
Comparison	6	20.7%	29.7%
Retail Service	6	20.7%	14.9%
Leisure Services	11	37.9%	24.3%
Financial & Business Services	0	0.0%	10.0%
Vacant	5	17.2%	11.6%
Total	29	100%	

- 6.50 As can be seen, the local centre has a limited mix of uses, with over 1/3 of the units being used for leisure service type uses, which includes 3 public houses. There is limited comparison goods

provision in the centre with this principally being specialist comparison goods stores (e.g. trophy shop) rather than day-to-day or destination comparison goods. There is only one convenience store in the local centre; Tesco Express. As illustrated on the diversity of uses plan, there is a high proportion of non-commercial units within the centre boundary including residential properties.

- 6.51 Whilst the mix of uses is markedly different from the national average as calculated by GOAD, this is not surprising given that GOAD only survey larger district and town/city centres and rarely survey centres as small as Woodville local centre. As such, the national average figure presented is not representative or comparable to the type of centre that Woodville is and not directly comparable.

Proportion of Vacant Street Level Property

- 6.52 There are currently 5 vacant units within the local centre which equates to around 14% of the total commercial units. Two of these units are located at the junction of High Street and Hartsthorpe Road with the others located further down High Street. As such, there is no real concentration of vacancies within the town centre. Whilst the average vacancy rate is higher than national average, this is not considered to be a significant cause for concern in relation to the vitality and viability of the centre noting the small scale of the centre and the fact that the national average is based upon larger centres. In addition, it is understood that the one of the vacant units (formerly a pharmacy) is under offer and will potentially be occupied by a new use soon.

Figure 7 - Existing Vacancies



- 6.53 There is no historic vacancy data for the local centre to compare the current level of vacancies to however the centre has benefitted from the occupation of previously vacant units in recent years including the opening of the florists and occupation of the former brewery building on High Street.

Commercial Yields on Non-Domestic Property and Commercial Rent

- 6.54 As set out in respect of Swadlincote town centre; publicly available data on commercial yields on non-domestic property is limited since the Valuation Office Agency (VOA) stopped publishing such

data within their 'Property Market Reports'. The availability of data is further reduced given the very limited scale of the local centre and as such we have been unable to source any information.

- 6.55 The 2015 retail study provided details of the rental and sales values of properties being marketed at the time of the study and as such for comparison we have undertaken the same process based on published marketing details, with the findings summarised in Table 7.

Table 7 – Swadlincote Town Centre Rental and Sales values in Marketed Properties.

Unit	Size (m ²)	Rent per annum	Rent per m ²	Type	Agent
42 High Street (Unit 1)	123	£19,000	£154	Retail	Salloway
59 High Street	30	£5,250	£175	Retail	Salloway
For Sale		Price	Price per m ²		
1 High Street & 2 Hartshorne Road	222	£175,000	£788	Retail	Johnson Fellows

- 6.56 The average rental value of those 2 units being actively marketed equates to £165 per m², higher than that identified for Swadlincote town centre in 2015 (£137 per m²) and 2019 (£95 per m²). However, as with Swadlincote this is a very small sample of retail units and therefore cannot be considered representative of rental levels within the local centre. Nevertheless, the fact that the rental values being sought are relatively high is a sign of demand in the local area and a strength of the local centre.

Customers' Views and Behaviour

- 6.57 There is no data available in respect of customer views of the local centre which is unsurprising given its limited scale. Nevertheless the 2015 Retail Study does give an indication as to how the local centre is used with the household survey noting a limited comparison and convenience goods offer, with the centre retaining just 0.6% of all comparison goods expenditure and 1.0% of all convenience goods expenditure in the Primary Catchment Area. Of this convenience goods expenditure all of it relates to top-up food shopping visits, making up around 4.7% of the market share for such trips. This is unsurprising given the scale of the centre and serves to highlight the limited retail offer of the centre and its function as a small local centre. This also highlights that the convenience floorspace in the centre serves a purely top-up food shopping function.

Retailer Representation and Intentions to Change Representation

- 6.58 There are 29 commercial units within the local centre which are predominantly occupied by independent retail, food/drink and service businesses which is unsurprising given the limited scale of the centre. Only one national multiple retailer is present within the local centre which is Tesco Express, with an ASDA petrol filling station on the edge of the local centre. There appears to be limited opportunity to increase the national multiple representation in the centre given the very limited scale of the centre, and the small unit sizes.

- 6.59 Nevertheless, there are opportunities for new retailers in the local centre with some vacant units being actively marketed, with two of these units understood to be 'under offer' suggesting that new retailers or other businesses may be shortly occupying the floorspace.

Pedestrian Flows

- 6.60 There is no pedestrian flow data available for the local centre. However, from observations during our site visit there was limited footfall within the centre, with the greatest concentration of footfall witnessed around the Tesco Express store entrance and around the pedestrian entrance to the public car park. The limited level of footfall is unsurprising given the limited scale of the local centre and the lack of any continuous frontage or concentration of commercial units, which are all separated by residential properties and other non-retail/commercial properties.

Perception of Safety and Occurrence of Crime

- 6.61 There is no data in respect of the perception of safety within the local centre however from our site visit the centre benefits from plenty of natural surveillance from residential and commercial properties as well as passing traffic. The location of the centre along the A511 also ensures that the centre is well lit at night.
- 6.62 In terms of the actual occurrence of crime²¹, the following crimes were recorded between May 2018 and April 2019 within the local centre:

Crime type	Total Crimes Report	Proportion of Crimes
Anti-social behaviour	8	36.4%
Burglary	4	18.2%
Violence and sexual offences	3	13.6%
Criminal damage and arson	2	9.1%
Other theft	2	9.1%
Vehicle crime	2	9.1%
Other crime	1	4.6%
Total	22	100%

- 6.63 This data highlights that a total of 22 crimes were reported in the local centre over a period of 12 months, an average of less than 2 crimes per month. Given the presence of commercial property and public houses, it is unsurprising that the most common offences recorded were violent offences, anti-social behaviour and burglary. The level of reported crime is not considered uncommon for a local centre of this size and overall the perception and occurrence of crime in the town centre is not a factor that is adversely affecting the vitality and viability of the local centre.

Woodville Local Centre Conclusions

- 6.64 The local centre clearly has a limited offer but serves a reasonable local retail and service function within Woodville despite this. It is considered that despite the commercial units being spread out across the centre, the centre is considered to be vital and viable.

²¹ <https://www.police.uk/derbyshire>

7. IMPACT ASSESSMENT

7.1 This section sets out the trade diversion and subsequent impact of the proposed development taking into account its proposed function and location. The following matters are considered in turn:

- Trade Draw;
- Assessment of Impact – in, edge and out of centre;
- Existing Provision
- Trade Diversion;
- Impact on Planned Investment;
- Impact on Town Centre Investment and Vitality and Viability; and,
- Impact Conclusions.

Trade Draw

7.2 As set out in respect of the sequential test, the proposed local centre will serve the proposed development itself, as well as pass-by traffic and the surrounding residential area. Noting the limited scale of the local centre, it is expected to serve a relatively limited catchment area, principally serving those living and working in Woodville as well as the southern and eastern areas of Swadlincote and the surrounding rural area which generally comprise of Zones A-C and Zone G as identified in the Retail Study.

7.3 As these are the areas which are most accessible to the application site it is envisaged that all of the proposed foodstores trade will be drawn from these zones albeit noting that there may be some degree of pass-by trade for all of the uses, particularly the proposed restaurant/takeaway use, given its location adjacent to the planned Woodville – Swadlincote Regeneration Route.

Assessment of Impact – in, edge and out of centre

7.4 At the outset it is important to consider what the impact of the proposed development must be tested against. In this respect, the NPPF glossary at Annex 2 defines what is meant by town centres stating that these are areas:

'defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area...'

7.5 The glossary confirms what is meant by primary shopping areas defining these as areas where *'retail development is concentrated'*.

- 7.6 Whilst the NPPF does not provide a definition of what is meant by in-centre, it does define what is meant by the term edge of centre confirming this as:

'For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary... In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.'

- 7.7 As such it can be read that for a retail use to be in centre it must be located within the primary shopping area, whilst for other main town centre uses, they must be located within the defined town centre boundary to be considered 'in-centre'. In this respect it is noted that the Local Plan Part 2 Policy RTL1 does not define a Primary Shopping Area (PSA) within Swadlincote, although a primary shopping frontage is defined.

- 7.8 Given this, and the fact that the Local Plan Part 2 was adopted prior to the publication of the NPPF2 (2018), it is necessary therefore to consider what the Primary Shopping Area for Swadlincote should be, noting that the significant size of the defined town centre boundary and the fact that the town centre boundary extends some 400m+ from the edge of the identified primary shopping frontage, and significantly more in terms of walking distances, across arterial roads that act as a barrier to connectivity between certain sites and the rest of the defined town centre boundary.

- 7.9 It is noted that the Retail Study included recommended boundaries for the primary shopping area as well as the wider town centre boundary and primary/secondary shopping frontages. The primary shopping area identified within the Retail Study unsurprisingly is focused around the defined primary shopping frontages focusing on the high concentration of retail uses along High Street extending along West Street, Market Street and Midland Road plus the existing Morrison's store which does benefit from an access (into the site) directly off High Street.

- 7.10 Whilst the drafting of this suggested PSA was made based on the definition of the previous version of NPPF, it is considered that the suggested PSA still accords with the updated definition and we agree that the area defined in the Retail Study as the Primary Shopping Area is appropriate when considering whether or not a site is located 'in-centre' for the purposes of the impact test.

- 7.11 The above is important as paragraph 89 of the NPPF confirms that impact should be assessed against existing, committed and planned investment **in a centre** and that the impact of the proposal **on town centre** vitality and viability, including local consumer and trade choice **in the town centre**.

- 7.12 The consideration of whether impact of retail development should be tested against a PSA or a wider defined town centre boundary was considered through the called-in planning application for a Sainsbury's store in Southport, Merseyside²². In considering this matter, the Inspector made the following comments which were endorsed by the Secretary of State:

²² Ref. APP/M4320/V/15/3002637

'318. It is difficult to understand why Paragraphs 24 and 26 of the Framework would make reference to different geographic areas for the "town centre". **To my mind it is reasonable to surmise that the consideration of town centre vitality and viability in Paragraph 26 is referring to the PSA**, which is the area where retail development is concentrated. However, Paragraph 26 makes specific reference to the "wider area" in respect of local consumer choice and trade.

319. This is particularly relevant in the case of Southport because there are several foodstores that are outside the PSA but in the wider town centre. These include Morrisons, which is just to the rear of Lord Street and is on an edge-of-centre site. Asda is on the Central 12 Retail Park and is well in excess of 300m from the PSA. Lidl is further out still **and these are, to my mind, out-of-centre stores, despite their location in the wider town centre**. So it will be relevant to consider what impact any loss of turnover would have on these foodstores because if they were to close down, for example, consumer choice and trade would be diminished. Furthermore, insofar as they generate linked trips to the PSA, there would be indirect impacts arising from the diversion of trade to the proposed retail development...

350. The Framework requires assessment of the impact of the proposal on town centre viability and viability, including local consumer choice and trade in the town centre and wider area. **For the reasons already given I consider that in retail cases the primary focus of impact should be the PSA**. However, in the case of Southport, the reference to the wider area means that it is also relevant to consider impacts on the town centre overall, particularly in relation to any effect on consumer choice and loss of linked trips.' **[our emphasis]**

- 7.13 The Inspector's report, and the Secretary of State's endorsement confirm that it is necessary to focus the impact test (for retail uses) on the impact that a development would have on the PSA, rather than the town centre as a whole. Nevertheless, it does confirm that the reference in NPPF paragraph 89 (formerly 26) to the need to consider the 'wider retail catchment' requires there to be some consideration on the wider town centre and the potential impact.
- 7.14 In the case of the proposed development, given that it includes other non-retail main town centre uses; in the form of a restaurant/takeaway and public house, there will clearly need to be consideration of the impact on the wider town centre including the impact of any loss of linked-trips associated with the edge and out-of-centre foodstores around Swadlincote.

Existing Provision

- 7.15 As already highlighted as the proposed development is submitted in outline, no operators for the proposed foodstore has been identified at this stage. Nevertheless, it is expected that the foodstore would be occupied by a national operator and will serve a smaller main food a shopping facility, plus a top-up food shopping facility, along with a limited ancillary comparison goods offer. It is expected that this store would be operated by a national multiple and could be either occupied by a 'discount foodstore' or a traditional foodstore operator.

- 7.16 In terms of similar main food shopping provision in the local area, this is dominated by existing stores in and around Swadlincote Town Centre. The main 'in-centre' provision is a large Morrison's superstore located within the primary shopping area which retains around 1/3 (32.2%) of all convenience goods shopping spend within the Primary Catchment Area. This store is well connected to the rest of the PSA and the primary shopping frontage on High Street with an access through the shopping frontage via stairs and lift providing access to the store entrance.

Figure 8 - Morrisons store and access from High Street



- 7.17 The Morrison's store is understood to be trading at its benchmark position based on the household survey carried out in support of the Retail Study. Whilst this doesn't allow for any trade lost to the now trading replacement Lidl store at Belmont Street, the store appears to be trading well with the store and car park both being busy during our visit (mid-week) and the store displaying some signs of overtrading including the use of upper shelves for storage, queues at tills and the significant use of end of aisle extension displays.
- 7.18 This is complimented by smaller scale convenience goods provision within the PSA including a small convenience store (Nisa Local), a butchers and bakery along with the mixed-goods stores; B&M Bargains and Poundstretcher which sell some convenience goods.
- 7.19 The large Sainsbury's superstore to the east of the town centre retains around 23% of the convenience goods shopping spend from the PCA and was estimated to be trading below its benchmark trading position based on the household survey carried out in support of the Retail Study. Nevertheless, following a site visit in June 2019, it appears that the store is trading well with a high proportion of the till open and the car park being busy. The store is located in an out-of-centre location, being some 370m (walking distance) of PSA, separated from the rest of the town centre and the PSA by Civic Way. Whilst there are crossing points across Civic Way there is no visual link between the store and the PSA with the route being difficult to navigate (see Figure 9).

Figure 9 - Pedestrian route from Sainsbury's to PSA



7.20 Alongside these superstores there is discount foodstore provision in the form of an Aldi and Lidl store. The Aldi store, located within The Pipeworks retail park is located approximately 250m from the Morrisons store entrance (walking distance) and around 350m from the primary shopping frontage on high street. Given the site layout and level differences between the Pipework's site and the Morrison's store and High Street there are no visual links from the Aldi store thereby limiting connectivity between the two. As such, the Aldi store is considered to be an edge-of-centre store although located within the wider town centre boundary. This is also the case with the small Iceland store located within The Pipeworks development.

Figure 10 - Pedestrian Connectivity from Aldi/The Pipeworks



7.21 The other discount foodstore provision in the form of Lidl on Belmont Street to the north. This store, built as a larger replacement for a previous Lidl store on the same site, opened in late 2015/early 2016 and is located some 270m (walking distance) from the PSA, separated from the

rest of the town centre by Civic Way. Pedestrian connectivity to the PSA is limited by the absence of a pedestrian crossing close to the site.

7.22 There are smaller scale convenience stores in the PCA which provide a top-up food shopping facility serving a small catchment, this includes Tesco Express stores at Woodville and Church Gresley Local Centres, Sainsbury's Local at Castle Gresley Local Centre and the ASDA petrol filling station kiosk on the edge of Woodville Local Centre.

7.23 Further afield there is a large out-of-centre Tesco Extra store and out-of-centre Aldi store located off Nottingham Road in Ashby-de-la-Zouch. Both of these stores draw trade from the primary catchment area.

Trade Diversion

7.24 The estimated convenience and comparison goods trade diversion is set out at Table 9 of Appendix 6. The trade diversion patterns have been estimated based on the guiding principle of 'like affects like' taking into account the function/offer of the proposed foodstore, existing provision, existing turnover of stores and current shopping patterns in the primary catchment area. Given that the proposed foodstore will provide a smaller main food shopping facility it will principally draw trade from existing stores which serve a similar function.

7.25 With this in mind, it is expected that the majority of the convenience goods turnover will principally be diverted from the main foodstores in the primary catchment including those within and on the edge of Swadlincote and, to a lesser degree, those foodstores located within Ashby-de-la-Zouch which draw trade from the Woodville area, and the wider PCA. In terms of the comparison goods offer associated with the foodstore, given that this is an ancillary offer serving those already shopping in the foodstore, this trade will principally be drawn from other foodstores.

7.26 For ease of reference, Table 8, summarises the expected convenience goods trade diversion patterns associated with the proposed foodstore.

Table 8 - Convenience Goods Trade Diversion - Proportion of Proposed Foodstore Turnover

Retail Destination	Trade Diversion (%)
Swadlincote Town Centre	
Morrison's	21%
Other	0.5%
Swadlincote Town Centre (edge of centre)	
Aldi	19%
Lidl	19%
Local Centres	
Woodville Local Centre	0.5%
Church Gresley Local Centre	0.5%
Castle Gresley Local Centre	0.5%
Other	
Sainsbury's, Civic Way, Swadlincote	18%
Aldi, Ashby	8%
Tesco, Ashby	12%
Other	1.5%

- 7.27 As shown in Table 8, it is expected that up to 21% of the foodstore's convenience goods turnover will be diverted from the Morrison's store in Swadlincote Town Centre with a further 19% diverted from both the Aldi and Lidl stores. A slightly lower amount of trade is expected to be diverted from the Sainsbury's store owing to its location slightly further away from the application site when compared to the other three foodstores located within or on the edge of Swadlincote town centre.
- 7.28 Given the lack of foodstore provision in Woodville and to the south/south-east of Swadlincote, trade is also expected to be diverted from the existing foodstore provision in Ashby-de-la-Zouch in the form of the out-of-centre Tesco (12%) and Aldi (8%) stores.
- 7.29 A small proportion of the foodstore's trade will be drawn from the smaller scale top-up food shopping provision located within the local area including nearby Tesco Express and Sainsbury's Local stores.
- 7.30 It is not possible to calculate the likely trade draw or trade diversion of the proposed restaurant/takeaway or pub given that such uses generally have a fairly disparate pattern of trade, diverting trade, or generating new trade, from a wide range of destinations. Nevertheless, any trade diversion will be limited given the scale of the development, and importantly the lack of comparable facilities in the town centre; particularly in terms of the proposed restaurant/hot-food takeaway with potential drive-thru with no comparable provision provided within any centre.

Impact on Planned Investment

- 7.31 Paragraph 89 of the NPPF and Local Plan Part 2 Policy RTL1 require the assessment of impact on existing, committed and planned public and private investment in a centre. As such, it is necessary to identify any committed and planned investment in defined centres. In the absence of any guidance on what should be treated as 'planned investment' in either the NPPF or PPG, in considering whether some potential investment should be treated as planned investment we have had regard to the policy-status of the investment and the progress made towards securing the investment as outlined as appropriate considerations in the Inspector's Report relating to the called-in application at The Mall, Cribbs Causeway, South Gloucestershire²³ when considering planned investment.
- 7.32 In this regard, Local Plan Policy Part 2 makes reference to five development opportunity sites within Swadlincote Town Centre, which were also identified through the 2012 Swadlincote Town Centre Vision and Strategy document. Whilst the sites are identified potential development sites, all the sites are currently occupied, in part or in full, by active uses and therefore their potential availability for redevelopment is limited, with a number of sites in multiple site ownerships. The only site where there is a significant area of vacant and (as we understand) available land is Potential Redevelopment Site 2, however only half this site is actually vacant, with the remainder occupied

²³ APP/P0119/V/17/3170627

- by a bowling green and dentist surgery. The other 4 sites are all predominantly occupied by active uses which would either need to be relocated off or on-site.
- 7.33 Noting the lack of availability and mixed ownerships of these sites it is unsurprising that no developer has been identified or is currently promoting the redevelopment of any of these sites. In addition, we are not aware of any progress or commitment to purchase any of the sites to create a development site in a single ownership. Finally, no planning applications have been submitted to date on any of the sites although applications (and planning permissions, including implemented consents) exist on sites for either partial redevelopment or the change of use of the existing buildings which post-date the adoption of Local Plan Part 2 and therefore further undermine any potential for the redevelopment of some of these sites.
- 7.34 Whilst these sites have policy support for their redevelopment, it is clear that there has been no progress in bringing forward development on any of these sites and therefore these sites cannot be considered to be planned investment for the purposes of the impact test.
- 7.35 Nevertheless, it is clear that the proposed local centre will provide a mix of uses and scale of development that is significantly different to that envisaged to be delivered through the potential development sites, all of which are intended to provide a mix of uses including offices, residential and other main town centre uses. As such, the delivery of a small local centre at the application site will not affect the potentially delivery of any of these development sites.
- 7.36 In terms of other planned investment, we have been unable to identify any further sites or schemes which can be considered as planned investment. Whilst there are a number of schemes that have come forward, or are coming forward, within the town centre, these relate to changes of use to existing buildings and upper floors to meet identified occupier requirements or convert floorspace into residential use. Such schemes will be unaffected by the proposed Local Centre.
- 7.37 Finally, Swadlincote Town Centre has benefited from improvements to existing buildings in the town centre through the Heritage Lottery Funded Swadlincote Townscape Heritage Scheme, with match funding from South Derbyshire District and Derbyshire County Councils with the scheme due to end in July 2019. This has helped to deliver improvements to buildings, including new shopfronts and internal refurbishment, of a number of buildings within the town centre, a number of which have been reoccupied, having previously been vacant (e.g. nos, 2-6 Midland Road).
- 7.38 The former Co-Op building has recently been refurbished (corner of Grove Street and West Street) through the Townscape scheme and is currently being actively marketed. Whilst this isn't considered as planned investment, as the investment has already occurred, the development of a local centre on the application site will not compete with or prevent the occupation of this refurbished unit, which provides around 142m² of floorspace.
- 7.39 Given the above, it is clear that the proposed development will not have a significant adverse impact on any planned or committed investment within the town centre.

Impact on Town Centre Vitality and Viability

- 7.40 This subsection considers the impact of the proposed development on town centre vitality and viability, including existing investment within the town and local centres. At the outset it is important to note that the consideration of impact must be assessed against the current vitality and viability of existing town centres. In this respect, this must be considered against the health checks provided for Swadlincote town centre and Woodville local centre as set out in Section 5 of this report whilst highlights that both centres are vital and viable.
- 7.41 An important stage of considering the impact on a centre is the quantitative impact on the existing turnover of a centre as a result of the expected level of trade diversion. At the outset it is important to note that the quantitative assessment provided at Table 9 of Appendix 6 allows for the reopening of the Lidl store, which at the time of the household survey was not trading. The impact of the reopening of the Lidl store has already occurred with the store re-opening in late 2015/early 2016 and as such the health check already takes into account any trade diversion and resultant impact associated with this commitment.
- 7.42 It is important to note that, as explained within the retail impact methodology, the impact of the proposed foodstore has been calculated based upon a net floorspace equivalent to 115% of its expected net floorspace figure. This has been done to allow some flexibility in terms of the split of convenience and comparison floorspace. As such, the quantitative impact figures presented in this assessment overestimate the impact of the development on the defined centres and stores and therefore represent a cautious and worst case impact scenario.
- 7.43 As set out earlier in this section, the proposed foodstore is expected to divert around 21% of its convenience goods turnover from Swadlincote town centre with a negligible amount of trade (<1.0%) being drawn from Woodville local centre. The remainder of the turnover will be drawn from edge and out-of-centre foodstores around Swadlincote town centre as well as existing out-of-centre foodstores in Ashby-de-la-Zouch.
- 7.44 Given this level of trade diversion, and as set out at Table 9 of Appendix 6, the proposed foodstore will divert around £3.9million from Swadlincote town centre, with the vast majority of this to be diverted from the existing Morrison's store (circa £3.2million). This results in a quantitative impact on existing turnover (at 2024) of 3.4% on Swadlincote town centre when compared to the existing town centre turnover²⁴ of around £110million.
- 7.45 The vast majority of the trade would be diverted from the large Morrisons store, a store which is known to be trading well based on the household survey findings, with the household survey suggesting that the store was slightly overtrading against its expected benchmark performance, and recent site visit which highlighted that the store and car park was very well used. Even after the impact of the proposed store, the Morrisons store is expected to be trading close to its

²⁴ Allowing for trade diversion associated with the existing Lidl store.

- 'benchmark' trading position at 2024, trading at 93% of the benchmark position²⁵. Given the trading strength of the Morrisons store it is clear that it is resilient to competition and therefore a limited trade diversion from the store, equating to 6.7% of its total turnover, will not result in a significant adverse impact on the store or put that store at risk of closure.
- 7.46 The level of trade drawn from other retailers in the town centre would be limited to around £0.7million, with the majority of this being drawn from larger comparison goods stores (e.g. B&M Bargains, Poundstretcher etc.) as a result of the ancillary comparison goods offer of the foodstore. Given that this would be split across multiple stores, the impact on any individual stores would be limited.
- 7.47 As such, the level of trade diversion from the town centre is limited and a trade diversion of around 3.4% would not amount to a 'significant adverse impact' on the town centre as a whole or on any existing investment in the town centre.
- 7.48 The store will also divert some trade from stores located on the edge of the town centre including Aldi, Lidl and Sainsbury's. Whilst the stores are located away from the primary shopping area, it is necessary to consider how any impact on these stores will affect the primary shopping, for example through the loss of linked trips.
- 7.49 The proposed store is expected to divert around 19% of its convenience goods turnover from (£2.7million) from both the Aldi and Lidl stores. In respect of the Aldi store, this store is significantly overtrading with the store trading approximately £10.4million over its benchmark turnover position even after taking into account the opening of the Lidl store. Even after this level of trade diversion the store will still be significantly overtrading when compared to its benchmark position. Given this, and the likely strong trading performance of the recently reopened Lidl store, the trade diversion would not adversely impact the operation of either store and any linked trips being made from these stores to other facilities within the town centre would be retained.
- 7.50 A further 18% of the proposed foodstores trade would be diverted from the Sainsbury's store on civic way which is considered out-of-centre owing to its distance and separation from the primary shopping area. Whilst this store is undertrading against its benchmark trading position, the level of undertrading is not so significant as to put into question the ongoing viability of the foodstore. The level of impact on this store equates to 7.6% of its total turnover and therefore any linked trips being made from the store to the town centre are unlikely to be materially affected by this level of trade draw.
- 7.51 At the outset when considering the impact on linked trips to the town centre it is important to note that those current customers who undertake a linked trip to other facilities in the town centre are likely to be less inclined to amend their shopping patterns and visit the proposed foodstore in favour

²⁵ See benchmark trading position as set out at Table 8 of Appendix 6.

of their existing store of choice. In addition, it is important to note that the proposed local centre will deliver a very limited mix of uses and services on the site and therefore the potential to undertake a linked trip to other facilities within the local centre will be very limited. As such, customers will still need to visit Swadlincote town centre to visit and make use of a full range of services and facilities. As such, whilst a linked trip could be lost, a visit to the town centre either as part of a separate trip or a linked trip from the application site would still be required to be made.

7.52 Given the above it is clear that the potential for a material loss of linked trips being made to the town centre is limited. Nevertheless, it is noted from the retail study that the vast majority of shopping trips to the foodstores within and on the edge of the town centre do not result in a linked trip being made to the town centre. Based on the data presented within paragraphs 4.29 and 4.30 of the Retail Study the following proportion of linked trips are made to the town centre from the Aldi, Morrisons and Sainsbury's stores;

- Morrisons – 21.2%
- Aldi – 19.9%
- Sainsbury's – 11.2%

7.53 It should be noted that not all of these linked trips being made are made to other retail destinations, and will include those who are visiting a bank, other leisure services and those choosing to buy petrol from the supermarket petrol filling station. As such, the actual number of linked trips being made to other retail provision will be significantly below the figures presented above.

7.54 Taking into account the relatively limited number of linked trips being made from the existing foodstores within and on the edge of the town centre, combined with the limited offer of the proposed development, the proposed development will not result in any material loss in linked trips thereby limiting any potential impact on Swadlincote town centre. Clearly in this respect any impact on linked trips would not result in a significant adverse impact on the town centre.

7.55 Given the very limited offer of the convenience stores within the nearby local centres, which serve a very small and localised top-up food shopping offer, a very limited amount of trade will be drawn from stores within the local centre with less than 1% of the proposed development's turnover drawn from Woodville, Church Gresley and Castle Gresley local centres. This will result in an impact on the total turnover of each defined centre of less than 4%, with the greatest impact on Woodville Local Centre (Tesco Express). This level of impact is not considered to amount to a significant adverse impact noting that the Tesco Express appears to be well used by the surrounding population and pass-by traffic.

7.56 The rest of the trade of the proposed foodstore will be diverted from out-of-centre destinations, including foodstores in Ashby-de-la-Zouch, which benefit from no policy protection.

- 7.57 As already highlighted, the proposed public house and takeaway/drive-thru will draw trade from a range of destinations with only a limited proportion of this from facilities in town centres and as such any trade diversion associated with this will be limited. In this regard it is noted that both Woodville local centre and Swadlincote town centre have a strong food and drink offer with 11 and 30 units respectively being in use for such leisure uses. As such, any impact from these centres will be felt across a number of uses/units and therefore have a limited impact on these uses/centres.

Impact Conclusions

- 7.58 A comprehensive assessment of the impact of the proposed development has been carried which assumes a worst-case scenario in respect of potential turnover and trade diversion supplemented by up-to-date health checks of the nearby town and local centres. The assessment highlights that the majority of the development's turnover will be drawn from stores and destinations located outside of the town centres/primary shopping areas and that the limited level of trade diversion from town centres would clearly not result in a significant adverse impact on any defined centre taking into account the clear strength of the defined centres within the catchment area. As such, the proposed development is considered to accord with the relevant impact tests set out in NPPF paragraph 89 and Local Plan Part 2 Policy RTL1.

8. CONCLUSIONS

- 8.1 This Retail Statement has been prepared in support of the proposed local centre at Occupation Lane, Woodville and assesses the proposed main town centre uses against the relevant sequential and impact tests. The proposed main town centre uses will deliver a small local centre which complements the wider mixed-use development of the site including a foodstore (Use Class A1) of circa 1,600m² gross floorspace, a Public House (Use Class A4) of circa 550m² gross floorspace; and a Restaurant/Fast-Food (Use Class A3/A5) of circa 700m² (gross).
- 8.2 A detailed sequential assessment has been prepared and a number of sites assessed located within, on the edge of and close to Swadlincote town centre and defined local centres. The sites have been assessed and no site is considered to be suitable **and** available to accommodate the proposed main town centre uses therefore satisfying the sequential test as set out at NPPF para.86 and Local Plan Part 2 Policy RTL1.
- 8.3 Detailed health checks have been prepared for Woodville local centre and Swadlincote town centre building upon those surveys carried out as part of the 2015 Town Centre Retail Study. Woodville local centre has a limited offer but serves a reasonable local retail and service function within Woodville despite this. Although the commercial units are spread out throughout the centre, it is considered to be vital and viable.
- 8.4 Swadlincote town centre is vital and viable serving an important role as a local retail and service destination for Swadlincote and the surrounding rural area. The town centre has benefitted from significant investment in recent years which have helped to bring vacant units back into use and attract new retail and other occupiers to the centre. The town centres very low vacancy rate, less than half the national average, is a significant sign of the centre's vitality and viability.
- 8.5 A comprehensive assessment of the impact of the proposed development has been carried which assumes a worst-case scenario in respect of potential turnover and trade diversion supplemented by up-to-date health checks of the nearby town and local centres. The assessment highlights that the majority of the development's turnover will be drawn from stores and destinations located outside of the town centres/primary shopping areas and that the limited level of trade diversion from town centres would clearly not result in a significant adverse impact on any defined centre taking into account the clear strength of the defined centres within the catchment area. As such, the proposed development is considered to accord with the relevant impact tests set out in NPPF paragraph 89 and Local Plan Part 2 Policy RTL1.
- 8.6 In summary this statement has provided the appropriate and necessary evidence demonstrating that the proposed main town centre uses accord with the relevant impact and sequential tests as set out at NPPF paragraph 90 and Local Plan Part 2 Policy RTL1.

APPENDIX 1 – RETAIL SCOPING NOTE

Retail Assessment Scoping Note – Occupation Lane, Woodville

Introduction

This note seeks to agree the scope of the Retail Assessment which is to be prepared and submitted in support of an application for the proposed local centre associated with the mixed-use development at Occupation Lane, Woodville. This note deals with the following matters in turn:

- Proposed Development;
- Planning Background;
- Sequential Assessment;
 - Area of Search;
 - Site Requirements; and
 - Sites to be Considered.
- Impact Assessment;
 - Base data;
 - Turnover of Proposed Development to be Assessed;
 - Trade Diversion/Impact; and,
 - Health Check.
- Conclusions.

Proposed Development

The proposed main town centre uses will form a small local centre which complements the wider mixed-use development of the site. The following mix of uses is proposed within the local centre:

- Foodstore (Use Class A1) of circa 1,600m² gross floorspace;
- Public House (Use Class A4) of circa 550m² gross floorspace; and,
- Restaurant/Fast-Food (Use Class A3/A5) of circa 700m² (gross).

As the proposed development remains at an early stage, and is submitted in outline, no operators for the proposed units have been identified at this stage. Nevertheless, it is expected that the foodstore would be occupied by a national operator and will serve a predominantly localised catchment that provides a smaller main and top-up convenience goods shopping facility along with a limited ancillary comparison goods offer. It is expected that this store would be operated by a national multiple and could be either occupied by a 'discount foodstore' or a traditional foodstore operator.

In terms of the potential occupation by a discount foodstore operator, given the presence of existing Aldi and Lidl stores within a 5-minute drive of the site, both of which occupy recently constructed and modern format stores, it is considered highly unlikely that the proposed store would be occupied by these retailers. Nevertheless, there are newer entrants to the discount foodstore market in the form of Jack's and The Food Warehouse by Iceland both of which are not represented in the town, albeit noting that Iceland operate a traditional store focused on the sale of frozen foods at the Pipeworks.

Whilst the traditional foodstore operators have significantly reduced new store openings in recent years, new store openings have generally focused on smaller foodstore formats. As such, it is considered that the foodstore could be occupied by a number of operators although recognising that it is unlikely that either Morrison's or Sainsbury's would occupy the store given the presence of their existing superstores within Swadlincote.

The public house is expected to be a food-led facility whilst the restaurant/fast food unit could be occupied by a restaurant provider or operate as a drive-thru restaurant facility. Both are expected to be occupied by national operators and would serve a localised catchment as well as a degree of pass-by traffic.

Planning Background

The site is not allocated for main town centre uses or identified as a defined centre within the Local Plan and therefore is considered to be an 'out-of-centre' location. As such, it is recognised that the proposed development will need to demonstrate accordance with the retail impact and sequential tests as set out in the NPPF and Local Plan Part 2 Policy RTL1. As the proposal is for more than 1,000m² of retail floorspace, an Impact Assessment dealing with the proposed retail uses will be required in accordance with Policy RTL1.

Sequential Assessment

The following sets out the proposed approach to be taken in respect of the Sequential Assessment.

Area of Search

The sequential assessment will consider sites within and around; Swadlincote Town Centre, Woodville Local Centre and Church Gresley Local Centre as the closest defined centres to the application site. Given that the proposed local centre will have a limited trade draw and will serve a very localised catchment, it would be inappropriate to extend the area of search beyond these centres. As such the other local centres within and around Swadlincote (Castle Gresley and Newhall) will not be considered through the sequential assessment as locating the development within or around these centres would serve a markedly different market to the application site.

As no primary shopping areas are defined within any of the centres, the sequential search will focus on sites located within the town/local centre boundaries before then considering sites that are located on the edge of (up to 300m from) and well connected to the centre boundary before then going on to consider whether there are any out-of-centre sites (i.e. beyond 300m of the primary shopping area) that are accessible and well connected to the centre.

Site Requirements

The sequential search will consider sites which can accommodate the proposed local centre in its entirety given its intention to serve the local area and the proposed development. As case law and Secretary of State decisions have confirmed that there is no requirement to consider the disaggregation of schemes, sites will be considered which are able to accommodate all three units/uses on a single site, or sites adjacent to each other.

Given the above, the sequential site search will be focused on those sites (and units) which could accommodate a foodstore of around 1,600m² (gross), a public house of circa 550m² and restaurant/fast food restaurant of circa 700m² with associated car parking. A development of this scale would need a site of around 1.5 hectares.

Taking into account the need to demonstrate flexibility, sites will be considered which could accommodate a development 20% larger and 20% smaller than that proposed. This is a significant degree of flexibility and such an approach is taken recognising that no end occupier has been identified for any of the proposed units at this stage.

In considering flexibility of format, given the limited scale of the proposed foodstore it is considered that only sites which can provide the sales area on a single floor should be considered given the significant trading difficulties of operating split-level stores (e.g. getting shopping trollies between floors etc). In terms of the proposed public house and restaurant uses, these are proposed to be delivered across a single floor, although some staff accommodation may be provided on an upper floor of the public house. As such, in considering whether sites are suitable to accommodate these uses, they must be able to accommodate the majority of the proposed floorspace on one floor.

Sites to be Considered

An initial site search exercise has been carried out and the following sites have been identified as requiring detailed consideration:

- Swadlincote Town Centre;
 - Local Plan Part 2 Potential Redevelopment Site 1 – Civic Centre, Civic Way;
 - Local Plan Part 2 Potential Redevelopment Site 2 – Land between Midland Road / Belmont Street;
 - Local Plan Part 2 Potential Redevelopment Site 3 – The Delph Block;
 - Local Plan Part 2 Potential Redevelopment Site 4 – Sharpes Estate;
 - Local Plan Part 2 Potential Redevelopment Site 5 – Land between West Street / Market Street; and,
 - Land north of Hill Street/South of Russel Street.
- Swadlincote Town Centre (edge of centre);
 - Vacant Site to the west of Coppice Side and south east of the Pipeworks.
- Church Gresley Local Centre (edge of centre);
 - Gresley Football Club site, Moat Street;
 - Land at Church Street (Allocation H3); and,
 - Vacant land north of Kirkland Way and Penkridge Road.

The above sites have been identified taking into account their current policy position and/or their potential availability for development.

Impact Assessment

This sub-section sets out the proposed approach in considering the impact of the proposed development.

Base Data

The following sets out the data which will be used in undertaking the quantitative retail impact assessment. Given the limited changes to the retail offer in and around Swadlincote in recent years it is proposed that data included within the Swadlincote Town Centre Retail and Leisure Study (the 'Retail Study') will be used as the basis for the assessment.

The **Study Area** for the assessment would be **Zones A-H** as defined in the Retail Study for ease of comparison between the assessment and the Retail Study.

The **Price Base** for the assessment will be **2013** to accord with the Retail Study.

The **Design Year** (i.e. the year at which impact will be considered) for the impact assessment will be **2024** taking into account guidance within the PPG (i.e. 2nd full calendar year of trading)

Population data will be drawn from Table 1 of Appendix 5 of the Retail Study.

Base **Expenditure** data (at 2015) will be taken from Table 2A (convenience) and Table 7 (comparison) of Appendix 5 of the Retail Study. This base data will be updated using the most up-to-date expenditure growth rates and projections, including making an allowance for special forms of trading, as provided in the Experian Retail Planner Briefing Note 16.

Existing **Shopping Pattern** data will be taken from Table 3 (convenience) and Table 27a (comparison) of Appendix 5 of the Retail Study.

No additional **Retail Commitments** have been identified within the local area which would materially affect local convenience goods shopping patterns since the Retail Study household survey was carried out. Nevertheless, as noted in the Retail Study, the Lidl at Belmont Street was not trading at the time of the household survey as the replacement store was under construction and as such; the replacement store has been built into the assessment as a commitment.

An allowance for **Inflow** (i.e. expenditure drawn from outside the Study Area) will be made when calculating existing turnovers taking into account the data set out in the Retail Study.

Turnover of Proposed Development to be Assessed

As already set out, the assessment will focus on the impact of the proposed foodstore. As no end occupier has been identified for the proposed foodstore, assumptions will be made in respect of the proposed floorspace split (net sales area including convenience and comparison goods sales area) and the assumed sales density (£ per m²) of the foodstore.

In order to calculate the likely turnover of the proposed foodstore, a net to gross ratio of 80% has been used giving a net floorspace figure of 1,280m². This net to gross ratio is higher than is commonly achieved by foodstores however it is used to assess a worst-case scenario and therefore represents a robust approach to the consideration of impact.

To allow a degree of flexibility for the end occupier, the Assessment will consider a flexible convenience and comparison floorspace split assuming that a maximum of 90% of the net floorspace is used for the sale and display of convenience goods and a maximum of 35% of the net floorspace is used for the sale and display of comparison goods. Whilst this results in the assessment considering the impact of a larger store than is actually proposed (i.e 125% of net floorspace), this would ensure that, in the event that planning permission is granted, any planning condition that would restrict the maximum level of net convenience and comparison floorspace has some in-built flexibility so that it meets a number of foodstore operators business models in terms of the floorspace split.

As no end occupier has been identified, an average sales density of the 'big 4' foodstore retailers (Tesco, Morrisons, Sainsbury's and ASDA) has been used to calculate an average sales density for the proposed foodstore as a worst-case scenario. This approach is already established within the Retail Study where it is used to calculate quantitative need for new retail floorspace (see Table 7.3). Rather than use the figure presented within the Retail Study, we have relied upon up-to-date sales density information as provided by GlobalData (formerly known as Verdict Retail). This is considered to be a cautious and robust approach given that the 'big 4' retailers have the highest average sales densities of all national foodstore operators. As the GlobalData data is presented at a 2018 price base, this will be converted to 2013 prices using the price indices data in the Experian Retail Planner Briefing Note.

Trade Diversion/Impact

Trade diversion and impact will be calculated on a goods basis (i.e. convenience and comparison goods) and then a cumulative impact figure presented. Trade diversion patterns will be presented on a Study Area basis.

Health Check

An up-to-date health check of Swadlincote town centre and Woodville Local Centre will be prepared and submitted alongside the assessment. This will be prepared in line with the guidance for such assessments within the PPG and will build upon the health checks prepared as part of previous Council Retail Studies and the vacant unit counts provided within the Council's Annual Monitoring Report. To assist with this, it would be useful if the Council could share any data, including historic data, that they may have relating to the health of the town centre (e.g. any unit count data).

Conclusions

This note has provided a detail proposed scope for the Retail Assessment dealing with the sequential and impact tests. This scope would ensure that a robust assessment is submitted in support of the planning application which is appropriate and proportionate to the scale of development proposed.

APPENDIX 2 – SEQUENTIAL SITE ASSESSMENTS

Site 1: Local Plan Part 2 Potential Redevelopment Site 1 – Civic Centre, Civic Way

Site Details	Comment
Site Plan	
Size	3.1 hectares
Retail Location	Edge-of-Centre
General Description	This site is located to the north west of the PSA in Swadlincote. The site is bound by the A514 Civic Way to the north and west, West Street and existing buildings to the south and Midland Road to the east. The site is currently occupied by a range of civic buildings including the Council offices, leisure centre, library and bus station and associated car parking all of which are in active use. There are currently no vacant sites or buildings within the site, with the former market hall being used as car parking.
Policy Designation	Within town centre boundary and designated potential redevelopment site.
Physical Constraints	Part of the site lies within the Conservation Area. As well as this, the Cottage is a Grade II listed building which is located within this site. This building would need to be retained/restored as part of any forthcoming scheme. There would need to be significant demolition and relocation of existing active uses before the site could come forward for development.
Suitability	Dealing first with the size of the site; at 3.1ha, it is clearly of sufficient scale to accommodate the proposed local centre uses however this would require the piecemeal development of part of the wider potential development site. The site is identified as a potential redevelopment site within Local Plan Part 2 (Policy RTL2) with the explanatory text confirming that the site has scope for a mixed-use development including increased parking provision whilst the Swadlincote Town Centre Vision and Strategy Document (2012) confirming that the existing uses would need to be relocated within the town

	centre. Furthermore, as stated within the vision document, the site offers the potential to create the largest single site within the town centre and therefore the site needs to come forward in its entirety to create this, and piecemeal development would prevent this. Given that the site needs to come forward as part of a redevelopment of the site, including the relocation of existing uses, it is considered that the site is unsuitable and would be too small to accommodate the proposed uses plus the existing uses and enhanced car parking provision. As such, the site cannot be considered to be suitable to accommodate the proposed development
Availability	As already highlighted, there are a number of active uses within this site including the council offices, leisure centre, library, royal mail sorting office and bus station with associated parking. Given the entirety of the site is within active use, and would need to be relocated either before or as part of any redevelopment, the site cannot be considered available within a 'reasonable period of time' to accommodate the proposed development.
Conclusion	The site cannot be considered to be suitable nor available for development. The site is considerably larger than the proposed local centre and the site would need to be brought forward comprehensively as opposed to piecemeal development. There are a significant number of active uses within the site and therefore these would all need to be relocated within the town centre before the site could be redeveloped. As such, this site is not considered to be sequentially preferable.

Photos of Site



Site 2: Local Plan Part 2 Potential Redevelopment Site 2 – Land between Midland Road and Belmont Street

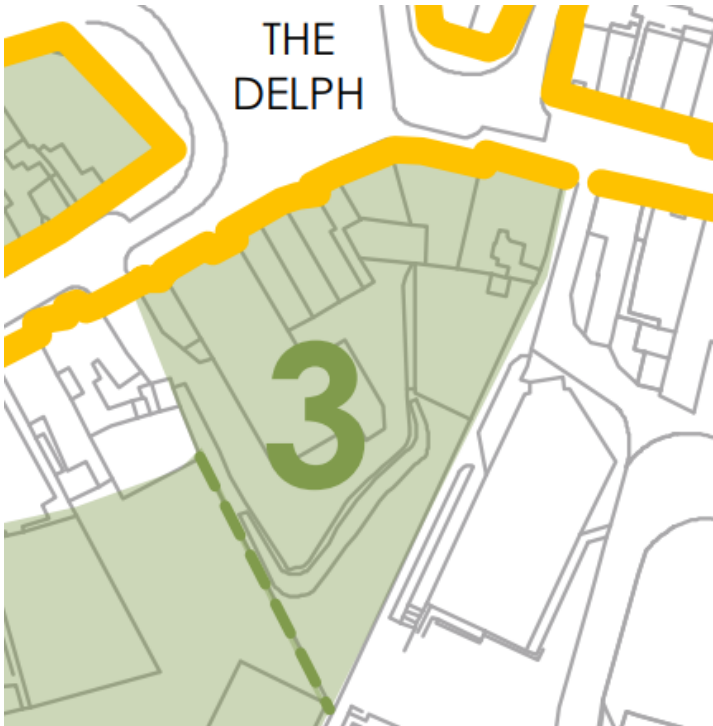
Site Details	Comment
Site Plan	
Size	0.6 hectares
Retail Location	Edge-of-centre
General Description	The site is bound by the A514 to the north, Belmont Road to the east, High Street to the south and Midland Road to the west. The site is currently occupied by 2x vacant sites, a bowling green and dental surgery.
Policy Designation	Within town centre boundary and designated potential redevelopment site.
Physical Constraints	The site lies within the Conservation Area and contains a couple of buildings which contribute positively to its character. The development of the site would involve the demolition of a number of units and the relocation of some existing uses including the bowling green. There are changes in levels across the site with the site rising from south to north.
Suitability	The site is considered to be unsuitable to accommodate the proposed development. Firstly, the site is too small. The entire site measures 0.6 hectares. However, taking into account the active uses on the site (the bowling green and the dental practice) only 0.3 hectares remains potentially available for development. Clearly this is significantly smaller than the 1.4 hectares required to accommodate the proposed local Even if the site were to be redeveloped in its entirety, the existing active uses would need to be relocated and suitable locations found in close proximity to the site to accommodate the uses.

Availability	The site is recognised as a redevelopment site within Local Plan 2 and is designated under Policy RTL2. Despite this, the whole site is not considered to be available. The policy text highlights that the bowling green is no longer in use however since this plan was adopted, the bowling green has since brought back into use. As such, this part of the site is not considered to be available. Furthermore, Hughes and Owen dental practice is located in the north eastern section of the site and is in active use. Some of the remaining site (Bank House and the garage to the rear of Bank House) is considered to be available and is within the ownership of the Council. This is noted on the Local Authority Land register.
Conclusion	The site cannot be considered to be suitable nor available to accommodate the proposed development. Even when ignoring the active uses on the site, the site is too small to accommodate the proposed local centre. In any case, there are a number of active uses that would need to be relocated for the site to come forward for development.

Photos of Site



Site 3: Local Plan Part 2 Potential Redevelopment Site 3 – The Delph Block

Site Details	Comment
Site Plan	
Size	0.3 hectares
Retail Location	In-centre
General Description	The site is bound by West Street/High Street to the north, Bank Passage to the east, a bodywork repairs garage to the south and a narrow access road to the west. The is occupied by nos. 1-11 West Street and nos. 1-4 High Street, a mix of retail/commercial units with additional commercial and residential space above.
Policy Designation	Within primary retail frontage, town centre boundary and designated as potential redevelopment site.
Physical Constraints	The site lies within the Conservation Area. Vehicular access into the site is restricted by a one-way street and a pedestrian only restriction between the hours of 10am and 4pm.
Suitability	The site is recognised as a redevelopment site in the Local Plan Part 2 (designated under Policy RTL2) however it is not considered to be suitable for this proposed development. The site is too small to accommodate the proposed scheme providing just 21% of the site area required to accommodate the proposed development whilst none of the existing units are of a sufficient size to accommodate any of the proposed uses. Access to the site would present issues given that the proposed scheme includes associated parking with vehicular access to the site severely limited by vehicle restrictions along west street, which is pedestrianised between 10am and 4pm. The site can also be discounted on the basis of the lack of suitable access.
Availability	No. 4 High Street has recently been refurbished with ground floor retail use and upper floor residential use and therefore this part of the site cannot be

	considered available. In addition, there are a number of active ground floor uses with the rest of the units on the site with no suggestion that these will or could be available in a reasonable period. As such, the site cannot be considered available to accommodate the proposed development.
Conclusion	This site is not considered to be suitable nor available to accommodate the proposed development. The site is too small to accommodate the proposed scheme. Access to and from the site, particularly for cars, would be difficult further restricting the site's suitability. Furthermore, the majority of this site is not available. On this basis, the site can be discounted as being a suitable and available sequentially preferable site capable of accommodating the proposed development.

Photos of Site



Site 4: Local Plan Part 2 Potential Redevelopment Site 4 – Sharpe’s Estate

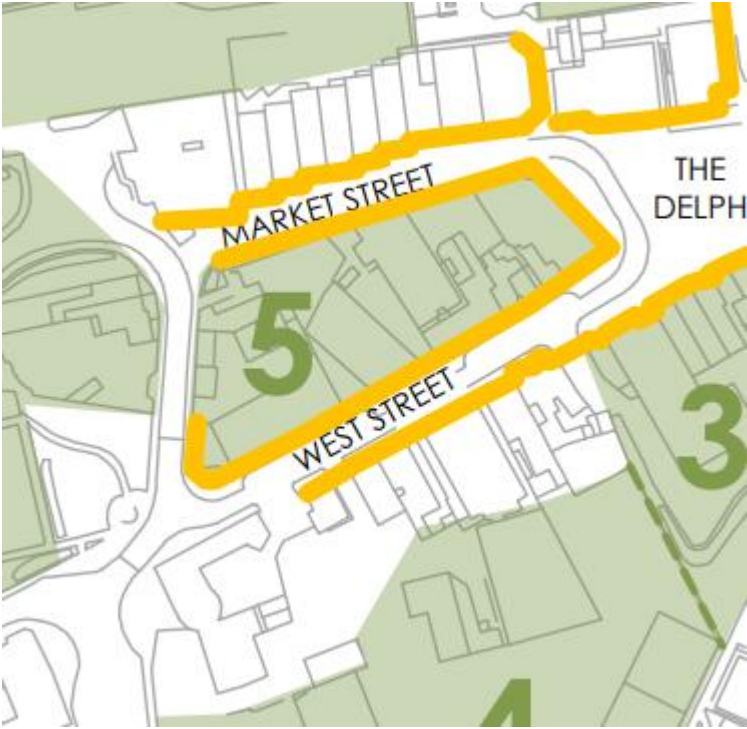
Site Details	Comment
Site Plan	
Size	1.19 hectares
Retail Location	Edge of Centre
General Description	The site is located to the south of Sharpe’s pottery museum which is a heritage, arts and community resource. Many of the buildings, associated with the former pottery use, were unused for some time and had fallen into disrepair. These buildings have been demolished and redeveloped to create small light industrial units. The site is bound by West Street to the north, Alexandra Road to the west, Rink Drive to the south and Bank Passage to the east. There is a public car park located to the south of the units for public use.
Policy Designation	Within town centre boundary and potential redevelopment location
Physical Constraints	Although not within the site boundary, there are a number of listed buildings immediately to the north of the site which are associated with the former pottery works. These comprise: offices of Sharpe Brothers and Company Ltd (Grade II), the Premises of S A Ratcliffe and P J Frames along Street Boundary (Grade II), Bottle Kiln to rear of premises occupied S A Ratcliffe and P J James (Grade II). The site is located within the Swadlincote Conservation Area and specifically within character area 3. As noted in the Conservation Character Assessment, the buildings on the south side of the Sharpe’s site form a very distinctive group within the Conservation Area.
Suitability	Whilst the site is broadly of an appropriate size to accommodate the proposed development, the actual area available for development, or potentially available for development, is significantly smaller and too small to accommodate the proposed development. As such, the site cannot be considered suitable to accommodate the proposed development.

Availability	The site is recognised as a potential redevelopment site in the Local Plan Part 2 however circumstances have changed and now this site can no longer be considered to be available. The location plan below shows the part of the site which has been developed. The former buildings associated with the former pottery making have been demolished and new buildings erected (9/2014/0539). This application was approved in July 2015 and have since been developed. The redevelopment comprises of small for light industrial, commercial or retail use. The proposal bought the redundant buildings back into use. To the south of these units is a public car park which is owned and controlled by the District Council and is accessed off Rink Drive. This appears to be well used and therefore this part of the site is also considered to be unavailable for development. As well as these uses, there is also a Timber yard within the centre of the site and a number of smaller units along the eastern boundary which are used for light industrial, retail and commercial uses. As such, although Policy RTL2 notes that the site could be redeveloped as was vacant, this is not the case. Overall, the site is considered to be in active use with a considerable proportion of the site being recently developed and therefore the site is not considered to be available to accommodate the proposed development.
Conclusion	The site is not considered to be suitable or available for development. Although the size of the site could accommodate the proposed development, the majority of the site is unavailable and within active use. A large proportion of the site has been redeveloped to create small units. The site is within Swandlincote Conservation Area and there are a number of listed buildings adjacent to the site. As such, this site is not considered to be suitable and available to accommodate the proposed development.

Photos of Site



Site 5: Local Plan Part 2 Potential Redevelopment Site 5 – Land between West Street and Market Street

Site Details	Comment
Site Plan	
Size	0.3 hectares
Retail Location	In centre
General Description	The site is located within Conservation Area and is occupied by a mix of uses including West Street Methodist Church, Nisa Local, and the former co-op building. The frontage with West Street has a cluster of attractive and important buildings from a heritage perspective. The site is bound by Market Street to the north and east, West Street to the south and Grove Street to the west.
Policy Designation	Primary retail frontage, town centre and potential redevelopment site.
Physical Constraints	The site is located within the heart of the Conservation Area and although there are no listed buildings within the parcel, the majority of the buildings within the site are considered to contribute positively to the special architectural or historic character. Vehicular access to the majority of the site is restricted with Market Street being pedestrians only between 10am and 4pm.
Availability	The site is identified as a redevelopment site in Local Plan Part 2, under Policy RTL2 however there are a range of active uses on the site, some of which have only come into use since the Local Plan Part 2 was adopted. In addition, there is a live planning application for the change of use of the former Methodist church and hall for residential uses. It is acknowledged that the former co-op building is being actively marketed by Johnson Fellows. Although this is considered to be available, the ground floor of this unit is 73.52 sq.m and therefore is significantly smaller than the

	smallest unit proposed. There are a number of active uses within the site including; undertakers, amusement lounge, ladies clothes shop, hairdressers, convenience store, beauty salon and milkshake bar.
Suitability	A site of 1.4 hectares is required to accommodate the proposed scheme however this site comprises 0.3 hectares and therefore is considered to be too small. Policy RTL2 of Local Plan 2 states that this site comprises a number of vacant or underused buildings which have historic importance and there is the potential with this site to incorporate the West Street frontages in a development scheme. This however would be difficult to incorporate within the application proposals. As mentioned above, there are a number of active uses within the site and which would prevent the whole site coming forward within a reasonable period. As such, the site is not considered to be suitable for the proposed development.
Conclusions	Overall, the site is not considered to be suitable or available for the proposed development. The site is too small in comparison to the proposed site and much of the site is in active use and therefore considered unavailable.

Photos of Site



Site 6: Land north of Hill Street/South of Russell Street

Site Details	Comment
Site Plan	
Size	0.2 hectares
Retail Location	Edge-of-Centre
General Description	The site is located to the south east of the town centre of Swadlincote and is bound by Russell Street to the north, Hill Street to the west, an existing building/dense wooded area to the south and Derby Road to the east. The site is currently under construction for residential uses.
Policy Designation	None - outside of town centre boundary
Physical Constraints	None
Suitability	The site is too small to accommodate the proposed development. This site measures 0.2 hectares and therefore would not be able to accommodate the development proposed.
Availability	The site is not available as it is currently under construction for a residential development to deliver 15 affordable dwellings (planning permission ref. 9/2017/0125).
Conclusion	As noted above, the site is being developed for residential uses and therefore is not available. As well as this, the site is too small to accommodate the proposed development. As such, the site cannot be considered suitable or available to accommodate the proposed development.

Photo of Site



Site 7: Land to the west of Coppice Side and south east of Pipeworks

Site Details	Comment
Site Plan	
Size	0.4 hectares
Retail Location	Out-of-centre
General Description	The site is located to the south of the town centre of Swadlincote and is bound by Coppice Side to the east and existing residential developments to the north, west and south. When travelling past the site along Coppice Side (north to south), there is a real sense of this site being located within a residential area.
Policy Designation	None
Physical Constraints	The site is located in and around existing residential development, including residential properties overlooking the site. A large retaining wall is located to the rear of the site.
Suitability	The site is too small to accommodate the proposed development. This site measures approximately 0.4 hectares, just 29% of the site area required to accommodate the proposed development.
Availability	The site is not considered to be available as there is a live application currently being determined for the erection of a two-storey residential building containing 18 self-contained one-bedroom specialised supported living apartments (reference 9/2018/0114). The applicant is Inclusion Housing and HB Villages Developments Ltd and therefore there is no reason why this site can not be brought forward as soon as the application is approved. The application is due to be determined on the 9 th July 2019. As such, this site is not considered to be available.
Conclusion	The site is not considered to be a sequentially preferable or capable of accommodating the proposed development given its scale and the fact that it is being prompted for alternative uses.

Photos of Site



Site 8: Church Gresley Local Centre

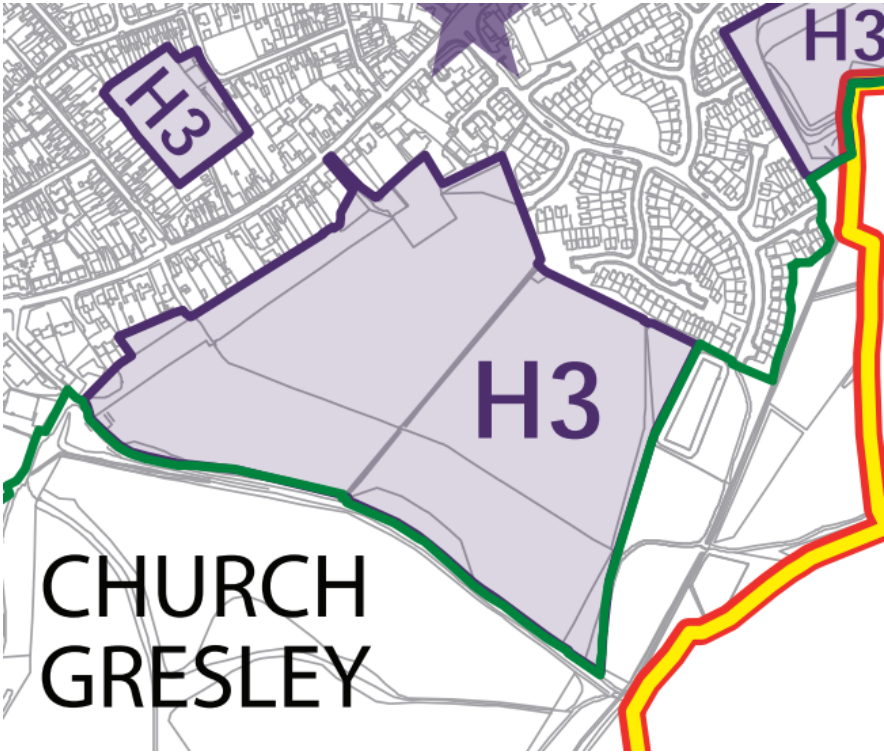
Site Details	Comment
Site Plan	
Size	0.8 hectares
Retail Location	Edge-of-centre
General Description	The site is a football ground associated with Gresley Football Club in active use. The site is surrounded by existing residential development. To the north are the back gardens off the residential properties off Oxford Street, to the west are the back gardens off the residential properties off Queen Street and to the south are the back gardens of the residential properties off Church Street. Moat Street is located to the east.
Policy Designation	This site has been allocated, along with two larger parcels in Local Plan Part 1, to accommodate 350 dwellings under Policy H3 Land at Church Street/Bridge Street/Football Club site. The site, along with the wider site is sought to come forward comprehensively which includes the relocation of the football club.
Physical Constraints	The site is accessed off Moat Street; a very narrow road residential road which would not lend itself to serving a commercial development. The football ground would need to be relocated and the wider development site to come forward before this small development site could come forward.
Suitability	Firstly, even taking into account sites which are 20% more and less than 1.4 hectares, this site is too small to accommodate the proposed development. Secondly, the site would need to come forward comprehensively as part of the wider development of H3 for the development of 350 dwellings. This site cannot come forward in isolation as per Policy H3. Policy H3 makes no provision or suggestion that the uses proposed as part of this development should be included within this site. As such, the proposed development would not be compliant with Policy H3.

	In addition, the highways access into the site is limited by narrow residential roads which would be unsuitable to accommodate a commercial development such as that proposed which will require ease of access for both customers and servicing vehicles. Finally, this site is located away from the application site and the Woodville-Swadlincote Regeneration Route and therefore would serve a markedly different market than the application site.
Availability	An outline application was submitted on this site in February 2011 (reference: 9/2011/0083) for 43 dwelling and associated works. The application, despite a significant number of years passing, has yet to be determined. As noted above, the wider site is being brought forward for residential development and an additional 44 dwellings are required to deliver the housing requirement suggested in Policy H3. This suggests that the site is available however only in conjunction with the redevelopment of the wider site and as such, for the purposes of this proposed development, the site cannot be considered to be available.
Conclusion	This site is not considered to be a sequentially preferable site given that it is part of a wider allocation and this allocation would need to come forward comprehensively rather than coming forward as piecemeal development. The site is also too small to accommodate the proposed local centre.

Photo of Site



Site 9: Land at Church Street (Allocation H3)

Site Details	Comment
Site Plan	
Size	12.01 hectares
Retail Location	Edge-of-centre
General Description	The site comprises two large agricultural fields bound by the dense wooded area of Gresley Woods to the south/west. The site is bound by a dense wooded area to the south and part of the western boundary, Church Street and residential properties to the west and the north, Thorpes Down Road and existing residential properties to the east as well as a dense wooded area and agricultural fields.
Policy Designation	This site is allocated in the Local Plan Part 1 to accommodate 350 dwellings under Policy H3.
Physical Constraints	None
Suitability	An application was approved in March 2015 (reference 9/2013/0946) for the development of 306 dwellings, access parking and public open space. There were no elements of retail or commercial space approved as part of this application and similarly, there is no requirement within Policy H3 to include this within this allocation. A Reserved Matters application is currently being determined on this site which relates to landscaping only. It was submitted in March 2018 however it is yet to be approved (reference 9/2018/0830). The site comprises over 12 hectares and therefore given the size of the site, the whole site needs to come forward comprehensively for development and 350 dwellings need to be delivered on this site and the other 3 smaller parcels to meet the policy requirements set out in Policy H3. The site is much larger than the 1.4 hectares required to accommodate the

	proposed Local Centre and the piecemeal development of the site would not be suitable, either to accommodate the proposed development, or to deliver the requirements of the site-specific policy. In addition, this site is located away from the application site and the Woodville-Swadlincote Regeneration Route and therefore would serve a markedly different market than the application site. Given this, the site cannot be considered suitable to accommodate the proposed development.
Availability	An application has been approved in March 2015 for the development of 306 dwellings on this site and since this time, a RM application was submitted in March 2018 and is currently being determined. Given there is a RM application for residential development on this site, it is not considered to be available. The owner is promoting the site for residential development and is proposing to bring the site forward for this use. On this basis, the site is not considered to be available to accommodate the proposed Local Centre development.
Conclusion	The site is not considered to be a sequentially preferable as it is not considered to be either suitable or available for the proposed Local Centre taking into account the scale of the site, its location and the planning permission for residential uses.

Photo of Site



Site 10: Vacant land north of Kirkland Way and Penkridge Road

Site Details	Comment
Site Plan	
Size	0.5 hectares
Retail Location	Edge-of-Centre
General Description	The site comprises a small agricultural field currently used for grazing horses. The site is located within the existing settlement of Church Gresley. The site is bound by the existing residential properties off Church Road to the north, a builders yard to the west, existing residential properties off Penkridge Road/Leyburn Close/Kirkland Way to the south and a scrap yard to the east.
Policy Designation	None
Physical Constraints	Access to the site is limited with only a small agricultural access off Common Side, which is understood to be a private road serving a limited number of dwellings.
Suitability	The site is too small to accommodate the proposed Local Centre, providing a site area equivalent to 31% of that required. Secondly, access arrangements to the site are very poor and unlikely to be able to be upgraded without securing 3rd party land, and would therefore be unsuitable to accommodate the level of car and HGV traffic expected at the proposed local centre.
Availability	Whilst the site may be available given the lack of any built development on site, the issue relating to access and the likely need for 3 rd party land for access works means that the site cannot be considered to be available to accommodate the proposed local centre.
Conclusion	The site is not considered to be a sequentially preferable site given that it

	is too small to accommodate the proposed development and there is currently no appropriate access to the site.
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Photos of Site



Site 11 – South Derbyshire former Council Depot Site, Darklands Lane

Site Details	Comment
Site Plan	
Size	0.9 hectares
Retail Location	Out-of-centre
General Description	The site is located to the north west of the town centre of Swadlincote and was formerly used as a highways depot by South Derbyshire Council and car parking. The site has recently been cleared. The site is bound by Darklands Lane to the north, Darklands Road to the east, the A514 William Nadin Way to the south and allotments/wooded area to the west.
Policy Designation	Within town centre boundary
Physical Constraints	None
Suitability	At 0.94ha the site is 33% smaller than that required to accommodate the proposed local centre and therefore cannot be considered suitable to accommodate the proposed development. Even allowing for an appropriate level of flexibility, the site is still too small to accommodate the proposed local centre.
Availability	An application was approved on the 20 th December 2018 (reference 9/2018/0451) for the erection of a mixed-use development incorporating a public with restaurant with ancillary accommodation, a fast food restaurant with drive through, a residential care home facility, and 15 supported living apartments. End users have already been identified including Marstons and KFC. As such, given that end users have been identified and the application has been approved, with demolition already having been completed, the site cannot be considered to be available to accommodate the proposed local centre.
Conclusion	The site is too small to accommodate the proposed local centre and is clearly unavailable owing to the recently approved planning permission and the fact

that a number of end operators for the scheme have already been identified.

Photos of Site



Site 12: Former TG Green Pottery Site, John Street

Site Details	Comment
Site Plan	
Size	9.4 hectares
Retail Location	Out-of-Centre
General Description	The site forms the former TG Green Pottery Site which closed in 2007. John Street and Pool Street form the northern boundary of the site, Pool Street and green fields to the east existing commercial units to the west off Main Street.
Policy Designation	Strategic Employment Land Allocation E1C.
Physical Constraints	The site comprises of the redundant buildings which formed the former TG pottery site. This includes Grade II* listed 4no. Bottle Kilns, which represent a significant site constraint.
Suitability	Firstly, the site is a very large brownfield site which would need to come forward as a comprehensive development to make the remediation and demolition of the buildings viable and ensure the protection/enhancement of the existing listed bottle kilns. Secondly, the site measures approximately 9.4 hectares which is significantly larger than the 1.4 hectares required as part of the proposed development. Given the above the site is not considered suitable to accommodate the proposed local centre.
Availability	There is no marketing evidence available to suggest that the site is available for redevelopment although given that it is vacant it can reasonably assumed to be available.
Conclusion	The site is not considered to be a sequentially preferable site as the site is in an out-of-centre location that is not well connected to any defined centre. The edge of the site is approximately 800m (walking distance) from Church

Gresley Local Centre. In comparison the edge of the application site is just 380m from Woodville Local Centre and therefore it is clear that the application site is better connected and related to a town centre.

Nevertheless, given the scale of the site it is not considered to be suitable to accommodate the proposed local centre.

Photos of Site



APPENDIX 3 – SWADLINCOTE TOWN CENTRE – DIVERSITY OF USES

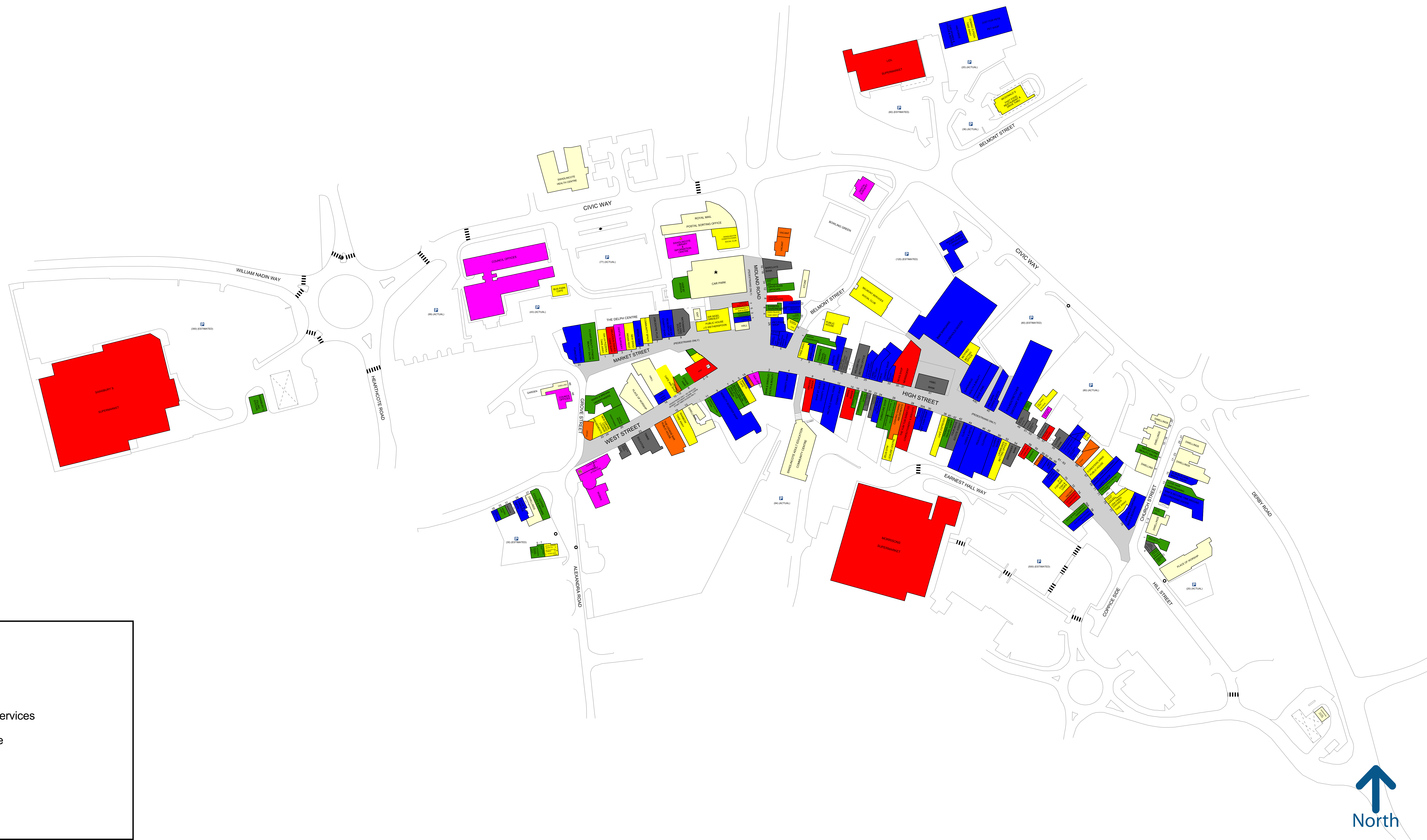
Table 1 - Swadlincote Town Centre Diversity of Uses (unit numbers)

Goad Category	2019 - Pegasus		2016 - GOAD		2015 - Retail Study + Sainsbury's & Lidl		2010 - Retail Study + Sainsbury's	
	Units	%	Units	%	Units	%	Units	%
Convenience	14	8.7%	14	8.4%	14	8.6%	15	9.9%
Comparison	52	32.3%	52	31.1%	45	27.8%	46	30.5%
Retail Services	36	22.4%	36	21.6%	37	22.8%	30	19.9%
Leisure Services	30	18.6%	33	19.8%	26	16.0%	22	14.6%
Financial and Business Services	20	12.4%	17	10.2%	15	9.3%	24	15.9%
Vacant	9	5.6%	15	9.0%	25	15.4%	14	9.3%
Total	161	100%	167	100%	162	100%	151	100%

Table 2 - Swadlincote Town Centre Diversity of Uses (Floorspace)

Goad Category	2019 - Pegasus		2016 - GOAD		2015 - Retail Study + Sainsbury's & Lidl		2010 - Retail Study + Sainsbury's	
	Floorspace (m ²)	%	Floorspace (m ²)	%	Floorspace (m ²)	%	Floorspace (m ²)	%
Convenience	15,110	40.5%	15,756	39.7%	8,675	27.7%	10,060	38.8%
Comparison	11,100	29.7%	11,474	28.9%	8,757	28.0%	7,031	27.1%
Retail Services	3,630	9.7%	3,530	8.9%	2,468	7.9%	2,417	9.3%
Leisure Services	4,230	11.3%	5,416	13.6%	7,129	22.8%	2,017	7.8%
Financial and Business Services	2,230	6.0%	1,858	4.7%	1,742	5.6%	2,415	9.3%
Vacant	1,040	2.8%	1,663	4.2%	2,546	8.1%	1,992	7.7%
Total	37,340		39,697		31,317		25,932	

APPENDIX 4 – SWADLINCOTE TOWN CENTRE – USES AND VACANCIES PLANS



Legend

- Comparison Retail
- Convenience Retail
- Retail Services
- Leisure Services
- Financial & Business Services
- Vacant
- Other Town Centre Use
- Other Uses

50 metres

Experian Goad Plan Created: 03/07/2019
Created By: Pegasus Planning Group





Experian Goad Plan Created: 03/07/2019

Created By: Pegasus Planning Group

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APPENDIX 5 – WOODVILLE LOCAL CENTRE – USES AND VACANCIES PLAN



KEY

- Local Centre Boundary
- Convenience Store
- Leisure Services
- Comparison
- Retail Services
- Residential

APPENDIX 6 – RETAIL IMPACT TABLES

Table 1 - Population

Zone	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
A	17,068	17,243	17,418	17,593	17,768	17,943	18,101	18,259	18,417	18,575	18,733
B	16,513	16,692	16,870	17,049	17,227	17,406	17,574	17,742	17,911	18,079	18,247
C	9,679	9,781	9,884	9,986	10,089	10,191	10,286	10,381	10,475	10,570	10,665
D	15,754	15,915	16,076	16,238	16,399	16,560	16,707	16,854	17,001	17,148	17,295
E	10,626	10,739	10,852	10,966	11,079	11,192	11,298	11,404	11,509	11,615	11,721
F	21,902	22,051	22,200	22,348	22,497	22,646	22,777	22,909	23,040	23,172	23,303
G	7,622	7,660	7,699	7,737	7,776	7,814	7,858	7,902	7,945	7,989	8,033
H	13,000	13,060	13,119	13,179	13,238	13,298	13,358	13,418	13,478	13,538	13,598
Total	112,164	113,141	114,118	115,096	116,073	117,050	117,959	118,868	119,777	120,686	121,595

Notes:

1. Population data taken from Swadlincote Town Centre Retail and Leisure Study (2015). Where data is not published for certain years population growth has been calculated pro-rata.

Table 2a - Convenience Goods Per Capita Expenditure

Zone	Incl SFT	Excluding SFT										
	2015	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
A	1,887	1,840	1,856	1,867	1,880	1,882	1,880	1,882	1,879	1,879	1,879	1,879
B	1,818	1,772	1,788	1,799	1,812	1,814	1,812	1,814	1,810	1,810	1,810	1,810
C	1,841	1,795	1,811	1,822	1,834	1,836	1,834	1,836	1,832	1,832	1,832	1,832
D	2,267	2,211	2,231	2,244	2,260	2,262	2,260	2,262	2,258	2,258	2,258	2,258
E	2,103	2,050	2,069	2,081	2,096	2,098	2,096	2,098	2,094	2,094	2,094	2,094
F	1,939	1,891	1,908	1,919	1,933	1,935	1,933	1,935	1,931	1,931	1,931	1,931
G	1,939	1,891	1,908	1,919	1,933	1,935	1,933	1,935	1,931	1,931	1,931	1,931
H	2,043	1,992	2,010	2,022	2,036	2,038	2,036	2,038	2,034	2,034	2,034	2,034

Notes:

1. Base 2015 including SFT derived from Swadlincote Retail & Leisure Study Appendix 5 Table 1 plus 'adjusted' SFT allowance (+2.8%) as set out in former Retail Planner Briefing Note 12.1 Appendix 3
2. SFT then removed from 2015 base figure in accordance with 'adjusted for SFT sales from stores' data at Figure 5 (Appendix 3) of Experian Retail Planner Briefing Note 16.
3. Growth rates applied from 2015 using growth rates set out in Figure 6 (Appendix 3) of Experian Retail Planner Briefing Note 16.
4. 2013 Prices.

Table 2b - Total Convenience Expenditure

Zone	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
A	31.4	32.0	32.5	33.1	33.4	33.7	34.1	34.3	34.6	34.9	35.2
B	29.3	29.9	30.4	30.9	31.2	31.5	31.9	32.1	32.4	32.7	33.0
C	17.4	17.7	18.0	18.3	18.5	18.7	18.9	19.0	19.2	19.4	19.5
G	14.4	14.6	14.8	15.0	15.0	15.1	15.2	15.3	15.3	15.4	15.5
PCA Sub-Total	92.4	94.2	95.7	97.2	98.3	99.1	100.0	100.7	101.6	102.4	103.3
D	34.8	35.5	36.1	36.7	37.1	37.4	37.8	38.0	38.4	38.7	39.0
E	21.8	22.2	22.6	23.0	23.2	23.5	23.7	23.9	24.1	24.3	24.5
F	41.4	42.1	42.6	43.2	43.5	43.8	44.1	44.2	44.5	44.7	45.0
H	25.9	26.3	26.5	26.8	27.0	27.1	27.2	27.3	27.4	27.5	27.7
Total	216.4	220.2	223.5	226.9	229.1	230.8	232.8	234.1	235.9	237.7	239.5

Notes:

1. Population (Table 1) multiplied by Per Capita Expenditure (Table 2a).
2. 2013 Prices.

Table 2c - Main Trip Convenience Expenditure

Zone	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
A	25.1	25.6	26.0	26.5	26.8	27.0	27.3	27.4	27.7	27.9	28.2
B	23.4	23.9	24.3	24.7	25.0	25.2	25.5	25.7	25.9	26.2	26.4
C	13.9	14.2	14.4	14.7	14.8	15.0	15.1	15.2	15.4	15.5	15.6
G	11.5	11.7	11.8	12.0	12.0	12.1	12.2	12.2	12.3	12.3	12.4
PCA Sub-Total	74.0	75.3	76.5	77.8	78.6	79.3	80.0	80.6	81.2	81.9	82.6
D	27.9	28.4	28.9	29.4	29.7	29.9	30.2	30.4	30.7	31.0	31.2
E	17.4	17.8	18.1	18.4	18.6	18.8	19.0	19.1	19.3	19.5	19.6
F	33.1	33.7	34.1	34.6	34.8	35.0	35.3	35.4	35.6	35.8	36.0
H	20.7	21.0	21.2	21.5	21.6	21.7	21.8	21.8	21.9	22.0	22.1
Total	173.1	176.2	178.8	181.6	183.3	184.6	186.3	187.3	188.7	190.2	191.6

Notes:

1. 80% of total expenditure (Table 2b) assumed to be main trip expenditure as per Swadlincote Retail and Leisure Study Appendix 5 Table 2B
2. 2013 Prices

Table 2d - Top-up Trip Convenience Expenditure

Zone	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
A	6.3	6.4	6.5	6.6	6.7	6.7	6.8	6.9	6.9	7.0	7.0
B	5.9	6.0	6.1	6.2	6.2	6.3	6.4	6.4	6.5	6.5	6.6
C	3.5	3.5	3.6	3.7	3.7	3.7	3.8	3.8	3.8	3.9	3.9
G	2.9	2.9	3.0	3.0	3.0	3.0	3.0	3.1	3.1	3.1	3.1
PCA Sub-Total	18.5	18.8	19.1	19.4	19.7	19.8	20.0	20.1	20.3	20.5	20.7
D	7.0	7.1	7.2	7.3	7.4	7.5	7.6	7.6	7.7	7.7	7.8
E	4.4	4.4	4.5	4.6	4.6	4.7	4.7	4.8	4.8	4.9	4.9
F	8.3	8.4	8.5	8.6	8.7	8.8	8.8	8.8	8.9	8.9	9.0
H	5.2	5.3	5.3	5.4	5.4	5.4	5.4	5.5	5.5	5.5	5.5
Total	43.3	44.0	44.7	45.4	45.8	46.2	46.6	46.8	47.2	47.5	47.9

Notes:

1. 20% of total expenditure (Table 2b) assumed to be main trip expenditure as per Swadlincote Retail and Leisure Study Appendix 5 Table 2B.
2. 2013 Prices.

Table 3a - Comparison Goods Per Capita Expenditure

Zone	Incl SFT	Excluding SFT										
	2015	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
A	2,795	2,452	2,530	2,606	2,632	2,671	2,720	2,785	2,857	2,940	3,028	3,116
B	2,774	2,433	2,510	2,586	2,612	2,651	2,698	2,763	2,835	2,917	3,005	3,092
C	2,862	2,510	2,590	2,668	2,694	2,735	2,784	2,851	2,925	3,010	3,100	3,190
D	4,048	3,550	3,664	3,774	3,811	3,869	3,938	4,033	4,138	4,258	4,385	4,512
E	3,438	3,015	3,111	3,205	3,237	3,285	3,344	3,425	3,514	3,616	3,724	3,832
F	2,800	2,456	2,534	2,610	2,636	2,676	2,724	2,789	2,862	2,945	3,033	3,121
G	3,038	2,664	2,749	2,832	2,860	2,903	2,955	3,026	3,105	3,195	3,291	3,386
H	3,414	2,994	3,090	3,182	3,214	3,262	3,321	3,401	3,489	3,590	3,698	3,805

Notes:

1. 2015 including SFT derived from Swadlincote Retail & Leisure Study Appendix 5 Table 1 plus 'adjusted' SFT allowance (+12.5%) as set out in former Retail Planner Briefing Note 12.1 Appendix 3
2. SFT then removed from 2015 base figure in accordance with 'adjusted for SFT sales from stores' data at Figure 5 (Appendix 3) of Experian Retail Planner Briefing Note 16.
3. Growth rates applied from 2015 using growth rates set out in Figure 6 (Appendix 3) of Experian Retail Planner Briefing Note 16.
4. 2013 Prices.

Table 3b - Total Comparison Expenditure

Zone	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
A	41.8	43.6	45.4	46.3	47.5	48.8	50.4	52.2	54.1	56.3	58.4
B	40.2	41.9	43.6	44.5	45.7	47.0	48.6	50.3	52.2	54.3	56.4
C	24.3	25.3	26.4	26.9	27.6	28.4	29.3	30.4	31.5	32.8	34.0
G	20.3	21.1	21.8	22.1	22.6	23.1	23.8	24.5	25.4	26.3	27.2
PCA Sub-Total	126.6	131.9	137.2	139.9	143.3	147.2	152.1	157.4	163.3	169.6	176.0
D	55.9	58.3	60.7	61.9	63.4	65.2	67.4	69.7	72.4	75.2	78.0
E	32.0	33.4	34.8	35.5	36.4	37.4	38.7	40.1	41.6	43.3	44.9
F	53.8	55.9	57.9	58.9	60.2	61.7	63.5	65.6	67.9	70.3	72.7
H	38.9	40.3	41.7	42.4	43.2	44.2	45.4	46.8	48.4	50.1	51.7
Outside PCA Sub-Total	180.7	188.0	195.1	198.7	203.2	208.5	215.0	222.2	230.2	238.8	247.4
Total	307.3	319.9	332.3	338.5	346.5	355.7	367.1	379.6	393.6	408.4	423.5

Notes:

1. Population (Table 1) multiplied by Per Capita Expenditure (Table 3a).
2. 2013 Prices.

Table 4a - Convenience Goods Shopping Patterns

Destination	Primary Catchment Area (Zones A-C & G)			Other Study Area (Zones D-F & H)		
	Main	Top-Up	Total	Main	Top-Up	Total
Zone A						
Newhall Local Centre	0.0%	2.1%	0.4%	0.0%	0.0%	0.0%
Other Local Shops - Zone A	0.0%	0.5%	0.1%	0.0%	0.0%	0.0%
Sainsburys Local, High Street, Swadlincote	0.0%	5.8%	1.2%	0.2%	0.0%	0.2%
Sub Total (Zone A)	0.0%	8.4%	1.7%	0.2%	0.0%	0.2%
Zone B						
Aldi, Hepworth Retail Park, Pipeworks, Swadlincote	22.5%	7.9%	19.4%	4.6%	1.6%	4.0%
Church Gresley Local Centre	0.0%	2.1%	0.4%	0.0%	0.8%	0.2%
Iceland, Unit 3, Coppice Side, Swadlincote	0.4%	1.1%	0.7%	0.3%	0.4%	0.3%
Morrisons, Coppice Side, Swadlincote	36.4%	15.8%	32.2%	9.6%	2.5%	8.1%
Sainsburys Local, Glamorgan Way, Church Gresley	0.3%	7.9%	1.8%	0.1%	2.5%	0.6%
Sainsburys, Civic Way, Swadlincote	24.0%	17.9%	22.9%	8.0%	2.5%	7.1%
Swadlincote	0.0%	4.2%	0.9%	0.1%	0.0%	0.1%
Tesco Express, Common Road, Church Gresley	0.0%	3.7%	0.8%	0.0%	0.4%	0.1%
Tesco Express, Heathcote Road, Swadlincote	0.0%	2.1%	0.4%	0.0%	0.0%	0.0%
The Pipeworks, Swadlincote	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%
Sub Total (Zone B)	83.8%	62.6%	79.5%	22.7%	10.7%	20.4%
Zone C						
Asda Petrol Filling Station, Tollgate, Burton Road, Woodville	0.0%	1.1%	0.2%	0.0%	0.0%	0.0%
Tesco Express, 42 High Street, Swadlincote	0.0%	3.7%	0.8%	0.0%	0.4%	0.1%
Woodville Local Centre	0.0%	1.1%	0.2%	0.0%	0.0%	0.0%
Sub Total (Zone C)	0.0%	5.8%	1.2%	0.0%	0.4%	0.1%
Zone G						
Moirs	0.0%	1.1%	0.2%	0.0%	0.0%	0.0%
Other Local Shops - Zone	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub Total (Zone G)	0.0%	1.1%	0.2%	0.0%	0.0%	0.0%
Other Outside PCA						
Zone H						
Aldi, Dents Road, Ashby-de-la-zouch	3.3%	0.0%	2.6%	7.1%	4.1%	6.6%
Ashby-de-la-Zouch	0.0%	0.5%	0.1%	0.3%	2.1%	0.6%
Co-op - Foodstore, 73 Market Street, Ashby-de-la-zouch	0.0%	0.0%	0.0%	0.3%	2.9%	0.9%
Co-op - Foodstore, 9 Derby Road, Ashby-de-la-zouch	0.3%	0.0%	0.2%	0.4%	7.8%	1.9%
Tesco, Resolution Road, Ashby-de-la-zouch	9.9%	3.7%	8.7%	16.1%	6.2%	14.1%
Sub Total (Zone H)	13.5%	4.2%	11.6%	24.1%	23.0%	24.1%
Other Zone D	0.0%	0.5%	0.1%	1.7%	14.4%	4.1%
Other Zone E	0.0%	0.5%	0.1%	0.2%	7.4%	1.6%
Other Zone F	0.0%	1.1%	0.2%	1.1%	18.9%	4.6%
Other Outside Study Area	2.7%	15.8%	5.2%	49.9%	25.1%	44.8%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Notes:

1. Shopping Patterns derived from Swadlincote Retail and Leisure Study Appendix 5

Table 4b - Convenience Goods Turnover 2019 & 2024

Destination	2019		2024	
	Primary Catchment Area	Other Study Area	Primary Catchment Area	Other Study Area
	Total (£m)	Total (£m)	Total (£m)	Total (£m)
Zone A				
Newhall Local Centre	0.43	0.00	0.45	0.00
Other Local Shops - Zone	0.11	0.00	0.11	0.00
Sainsburys Local, High Street, Swadlincote	1.18	0.21	1.23	0.22
Sub Total (Zone A)	1.71	0.21	1.78	0.22
Zone B				
Aldi, Hepworth Retail Park, Pipeworks, Swadlincote	19.03	5.21	19.84	5.39
Church Gresley Local Centre	0.43	0.21	0.45	0.22
Iceland, Unit 3, Coppice Side, Swadlincote	0.64	0.43	0.67	0.44
Morrisons, Coppice Side, Swadlincote	31.65	10.63	32.99	10.99
Sainsburys Local, Glamorgan Way, Church Gresley	1.82	0.74	1.89	0.77
Sainsburys, Civic Way, Swadlincote	22.45	9.25	23.40	9.56
Swadlincote	0.86	0.11	0.89	0.11
Tesco Express, Common Road, Church Gresley	0.75	0.11	0.78	0.11
Tesco Express, Heathcote Road, Swadlincote	0.43	0.00	0.45	0.00
The Pipeworks, Swadlincote	0.11	0.00	0.11	0.00
Sub Total (Zone B)	78.15	26.68	81.46	27.59
Zone C				
Asda Petrol Filling Station, Tollgate, Burton Road, Woodville	0.21	0.00	0.22	0.00
Tesco Express, 42 High Street, Swadlincote	0.75	0.11	0.78	0.11
Woodville Local Centre	0.21	0.00	0.22	0.00
Sub Total (Zone C)	1.18	0.11	1.23	0.11
Zone G				
Moirs	0.21	0.00	0.22	0.00
Other Local Shops - Zone G	0.00	0.00	0.00	0.00
Sub Total (Zone G)	0.21	0.00	0.22	0.00
Other Outside PCA				
Zone H				
Aldi, Dents Road, Ashby-de-la-zouch	2.57	8.61	2.67	8.90
Ashby-de-la-Zouch	0.11	0.85	0.11	0.88
Co-op - Foodstore, 73 Market Street, Ashby-de-la-zouch	0.00	1.17	0.00	1.21
Co-op - Foodstore, 9 Derby Road, Ashby-de-la-zouch	0.21	2.44	0.22	2.53
Tesco, Resolution Road, Ashby-de-la-zouch	8.55	18.49	8.91	19.13
Sub Total (Zone H)	11.44	31.57	11.92	32.65
Other Zone D	0.11	5.42	0.11	5.61
Other Zone E	0.11	2.13	0.11	2.20
Other Zone F	0.21	6.06	0.22	6.27
Other Outside Study Area	5.13	58.67	5.35	60.67
Total	98.25	130.84	102.41	135.31

Notes:

1. Shopping Patterns (Table 4a) multiplied by Total Convenience Expenditure (Table 2b)
2. 2013 Prices

Table 5a - Comparison Goods Shopping Patterns

Destination	Primary Catchment Area (Zones A-C & G)	Other Study Area (Zones D-F & H)
	%	%
Zone A		
Blooming Marvels Garden Centre, Meadow Lane, Newhall	0.0%	0.0%
Garden King Garden Market, Park Road, Swadlincote	0.4%	0.1%
Newhall Local Centre	1.3%	0.1%
Stanton Nurseries, Woodland Road, Burton-on-trent	0.0%	0.0%
Sub Total (Zone A)	1.7%	0.2%
Zone B		
Castle Gresley	0.7%	0.4%
Church Gresley Local Centre	0.7%	0.6%
Morrisons, Coppice Side, Swadlincote	1.2%	0.4%
Sainsbury's, Civic Way, Swadlincote	2.5%	0.7%
Swadlincote	24.5%	7.9%
The Pipeworks, Swadlincote	4.4%	1.8%
Sub Total (Zone B)	34.0%	11.8%
Zone C		
Masseys, Swadlincote Road, Woodville	0.2%	0.0%
Woodville Local Centre	0.6%	0.1%
Sub Total (Zone C)	0.8%	0.1%
Zone G		
Blackfordby	0.0%	0.0%
Moirs	0.2%	0.2%
Sub Total (Zone G)	0.2%	0.2%
Outside PCA		
Zone H		
Ashby-de-la-Zouch	3.7%	10.5%
Nottingham Road Retail Park, Ashby-de-la-zouch	0.0%	0.1%
Tesco, Resolution Road, Ashby-de-la-Zouch	0.8%	0.8%
Wickes, Wickes Unit 2, Dents Road, Ashby	0.5%	0.9%
Sub Total (Zone H)	5.0%	12.2%
Other Zone D	0.2%	1.4%
Other Zone E	0.0%	0.1%
Other Zone F	0.0%	0.2%
Other Outside Study Area	58.0%	73.9%
Total	100.0%	100.0%

Notes:

1. Shopping Patterns derived from Swadlincote Retail and Leisure Study Appendix 5

Table 5b - Comparison Goods Turnover 2019 & 2024

Destination	2019			2024		
	Primary Catchment Area	Other Study Area	Total inc. inflow	Primary Catchment Area	Other Study Area	Total inc. inflow
	£m	£m	£m	£m	£m	£m
Zone A						
Blooming Marvels Garden Centre, Meadow Lane, Newhall	0.00	0.00	0.00	0.00	0.00	0.00
Garden King Garden Market, Park Road, Swadlincote	0.57	0.23	0.79	0.67	0.26	0.94
Newhall Local Centre	1.93	0.23	2.16	2.29	0.26	2.55
Stanton Nurseries, Woodland Road, Burton-on-trent	0.00	0.00	0.00	0.00	0.00	0.00
Sub Total (Zone A)	2.50	0.45	2.95	2.96	0.53	3.49
Zone B						
Castle Gresley	1.02	0.90	1.92	1.21	1.06	2.27
Church Gresley Local Centre	1.02	1.13	2.15	1.21	1.32	2.53
Morrisons, Coppice Side, Swadlincote	1.70	0.79	2.66	2.02	0.93	3.14
Sainsbury's, Civic Way, Swadlincote	3.52	1.35	5.19	4.17	1.59	6.14
Swadlincote	35.11	16.09	54.58	41.57	18.91	64.47
The Pipeworks, Swadlincote	6.36	3.71	10.74	7.53	4.36	12.68
Sub Total (Zone B)	48.75	23.97	77.25	57.71	28.16	91.23
Zone C						
Masseys, Swadlincote Road, Woodville	0.23	0.00	0.23	0.27	0.00	0.27
Woodville Local Centre	0.91	0.11	1.02	1.08	0.13	1.21
Sub Total (Zone C)	1.14	0.11	1.25	1.35	0.13	1.48
Zone G						
Blackfordby	0.00	0.00	0.00	0.00	0.00	0.00
Moirs	0.23	0.34	0.56	0.27	0.40	0.67
Sub Total (Zone G)	0.23	0.34	0.56	0.27	0.40	0.67
Outside PCA						
Zone H						
Ashby-de-la-Zouch	5.34	21.27	26.61	6.32	24.99	31.31
Nottingham Road Retail Park, Ashby-de-la-zouch	0.00	0.11	0.11	0.00	0.13	0.13
Tesco, Resolution Road, Ashby-de-la-Zouch	1.14	1.58	2.71	1.35	1.85	3.20
Wickes, Wickes Unit 2, Dents Road, Ashby	0.68	1.80	2.48	0.81	2.12	2.92
Sub Total (Zone H)	7.16	24.76	31.92	8.47	29.09	37.57
Other Zone D	0.34	2.93	3.27	0.40	3.44	3.84
Other Zone E	0.00	0.11	0.11	0.00	0.13	0.13
Other Zone F	0.00	0.34	0.34	0.00	0.40	0.40
Other Outside Study Area	83.18	150.22	233.41	98.47	176.52	275.00
Total	143.30	203.22	351.05	169.63	238.80	413.79

Notes:

1. Allowance for inflow from outside Study Area to Swadlincote Town Centre of 6.6% as per 2015 Swadlincote Town Centre Retail and Leisure Study.
2. Total Comparison Expenditure (Table 3) x Multiplied by Market Share (Table 5a)
3. 2013 Prices

Table 6 - Proposed Development

Floorspace	Gross	Net	Sales Density	Turnover - 2019	Turnover - 2024
	m ²	m ²	£ per m ²	£m	£m
Convenience	1,600	1,152	12,369	14.25	14.42
Comparison		320	7,096	2.27	2.60
Total		1,280		16.52	17.02

Notes:

1. The net floorspace total is assumed as 80% of the gross floorspace. However, in the absence of an identified occupier, the assessment allows for up to 90% of the net floorspace to be used for the sale of convenience goods and up to 25% to be used for the sale of comparison goods (i.e. assessing the impact of 115% of the likely net floorspace). This is done to allow flexibility for any future end occupier.
2. Sales density an average of the 'big 4' retailers (ASDA, Morrisons, Sainsbury's and Tesco) as derived from GlobalData's (formerly Verdict Retail) Convenience and Comparison Goods Sales Densities of Major Grocers (2018) converted to 2013 prices.
3. Allowance for floorspace efficiencies taken from Figure 4a and 4b of the Experian Retail Planner Briefing Note 16.
4. 2013 prices.

Table 7 - Retail Commitments

Site			Convenience				Comparison				Total	
	Gross Floorspace	Total Net Floorspace	Net Floorspace	Sales Density	Turnover - 2019	Turnover - 2024	Net Floorspace	Sales Density	Turnover - 2019	Turnover - 2024	Turnover - 2019	Turnover - 2024
	m ²	m ²	m ²	£ per m ²	£m	£m	m ²	£ per m ²	£m	£m	£m	£m
Lidl, Swadlincote	2,016	1,307	1,046	9,649	12.61	12.76	261	5,797	1.51	1.73	14.12	14.50
Total	2,016	1,307	1,046		12.61	12.76	261		1.51	1.73	14.12	14.50

Notes:

1. Lidl, Belmont Street, Swadlincote (application ref. 9/2014/1176) - replacement store.
2. Floorspace taken from 2015 Swadlincote Retail Study and Sales Density (including VAT) taken from GlobalData's Convenience and Comparison Goods Sales Densities of Major Grocers 2018 converted to 2013 prices (using Price Indices set out at Appendix 4b of the same report)
3. Sales Density (including VAT) taken from GlobalData's Convenience and Comparison Goods Sales Densities of Major Grocers 2018 converted to 2013 prices (using Price Indices set out at Appendix 4b of the same report)
4. Allowance for floorspace efficiencies taken from Figure 4a and Figure 4b of the Experian Retail Planner Briefing Note 16.
5. 2013 Prices.

Table 8 - Convenience Store Trading Performance within Primary Catchment Area

Store	Net Sales Area	Convenience Sales Area (m²)	Sales Density (£ per m²)	Benchmark Turnover - 2019	Survey Derived Turnover - 2019	Over / Undertrading 2019	Benchmark Turnover - 2024	Survey Derived Turnover - 2024	Over / Undertrading 2024
	m²	m²	£ per m²	£m	£m	£m	£m	£m	£m
Zone B									
Aldi, Hepworth Retail Park, Pipeworks, Swadlincote	781	624	10,340	6.5	24.2	17.8	6.5	25.2	18.7
Iceland, Unit 3, Coppice Side, Swadlincote	496	481	6,551	3.2	1.1	-2.1	3.2	1.1	-2.1
Morrisons, Coppice Side, Swadlincote	4,368	3,494	12,087	42.2	42.3	0.0	42.7	44.0	1.2
Sainsburys Local, Glamorgan Way, Church Gresley	270	257	11,166	2.9	2.6	-0.3	2.9	2.7	-0.2
Sainsburys, Civic Way, Swadlincote	5,030	3,632	11,166	40.6	31.7	-8.9	41.0	33.0	-8.1
Tesco Express, Common Road, Church Gresley	149	142	13,177	1.9	0.9	-1.0	1.9	0.9	-1.0
Tesco Express, Heathcote Road, Swadlincote	149	142	13,177	1.9	0.4	-1.4	1.9	0.4	-1.4
Zone C									
Tesco Express, 42 High Street, Swadlincote	131	124	13,177	1.6	0.9	-0.8	1.7	0.9	-0.8
Total	11,624	9,134		103.3	105.4	2.1	104.5	109.6	5.1

Notes:

- 1. Floorspace taken from Swadlincote Town Centre Retail and Leisure Study (2015) - Appendix 5 Table 5.
- 2. Sales Density (including VAT) taken from GlobalData's Convenience and Comparison Goods Sales Densities of Major Grocers 2018 converted to 2013 prices.
- 3. Allowance for floorspace efficiencies taken from Figure 4a of the Experian Retail Planner Briefing Note 16.
- 4. 2013 prices.

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9 - Trade Diversion and Cumulative Impact

				Convenience		Comparison		Total			Convenience		Comparison		Total		
Retail Destination	Existing Turnover at 2024			Lidl Swadlincote							Proposed Development						Cumulative Impact
								Turnover following trade diversion	Solus Impact						Turnover following trade diversion	Solus Impact	
	Conv £m	Comp £m	Total £m	Trade Diversion %		Trade Diversion £m		%	£m	%	Trade Diversion %		Trade Diversion £m		%	£m	
Zone B - SOUTH DERBYSHIRE																	
Castle Gresley		2.27	2.27					2.27	0%			1.0%	0.03	2.24	-1.1%	-1.1%	
Sainsburys Local, Glamorgan Way, Castle Gresley	2.66		2.66					2.66	0%	0.5%	0.07		0.00	2.59	-2.7%	-2.7%	
Castle Gresley Local Centre Sub-Total	2.66	2.27	4.93	0%	0	0%	0	4.93	0%	0.5%	0.07	1.0%	0.03	4.83	-2.0%	-2.0%	
Church Gresley Local Centre	0.67	2.53	3.20					3.20	0%			0.5%	0.01	3.19	-0.4%	-0.4%	
Tesco Express, Common Road, Church Gresley	0.89		0.89					0.89	0%	0.5%	0.07		0.00	0.82	-8.1%	-8.1%	
Church Gresley Local Centre Sub-Total	1.56	2.53	4.09	0%	0	0%	0	4.09	0%	0.5%	0.07	0.5%	0.01	4.00	-2.1%	-2.1%	
Swadlincote	1.00	64.47	65.47	1%	0.13	18%	0.31	65.03	-1%	0.5%	0.07	25.0%	0.65	64.31	-1.1%	-1.8%	
Morrisons, Coppice Side, Swadlincote	43.98	3.14	47.11	10%	1.28	15%	0.26	45.58	-3%	21.0%	3.03	5.0%	0.13	42.42	-6.7%	-10.0%	
Swadlincote Town Centre Sub-Total	44.98	67.61	112.58	11%	1.40	33%	0.57	110.61	-2%	21.5%	3.10	30.0%	0.78	106.73	-3.4%	-5.2%	
Sainsburys, Civic Way, Swadlincote	32.96	6.14	39.10	10%	1.28	10%	0.17	37.65	-4%	18.0%	2.60	15.0%	0.39	34.67	-7.6%	-11.3%	
Aldi, Hepworth Retail Park, Pipeworks, Swadlincote	25.22		25.22	65%	8.30		0.00	16.93	-33%	19.0%	2.74		0.00	14.19	-10.9%	-43.8%	
Iceland, Unit 3, Coppice Side, Swadlincote	1.11		1.11	1%	0.13		0.00	0.98	-12%	0.5%	0.07		0.00	0.91	-6.5%	-18.0%	
The Pipeworks, Swadlincote	0.11	12.68	12.79			50%	0.87	11.93	-7%			20.0%	0.52	11.41	-4.1%	-10.8%	
Lidl, Belmont Street								14.50	#DIV/0!	19.0%	2.74	15.0%	0.39	11.37	-21.6%	-21.6%	
Tesco Express, Heathcote Road, Swadlincote	0.45		0.45					0.45	0%	0.5%	0.07		0.00	0.37	-16.2%	-16.2%	
Sub Total (Zone B)	109.05	91.23	200.27	87%	11.10	93%	1.61	202.06	1%	79.5%	11.46	81.5%	2.12	188.47	-6.8%	-5.9%	
Zone C - SOUTH DERBYSHIRE																	
Woodville Local Centre	0.22	1.21	1.43					1.43	0%			0.5%	0.01	1.42	-0.9%	-0.9%	
Tesco Express, 42 High Street, Woodville, Swadlincote	0.89		0.89					0.89	0%	0.5%	0.07			0.82	-8.1%	-8.1%	
Woodville Local Centre Sub-Total	1.11	1.21	2.32	0%	0.00	0%	0.00	2.32	0%	0.5%	0.07	0.5%	0.01	2.24	-3.7%	-3.7%	
Asda Petrol Filling Station, Tollgate, Burton Road, Woodville	0.22		0.22					0.22	0%					0.22	0.0%	0.0%	
Masseys, Swadlincote Road, Woodville		0.27	0.27					0.27	0%			1.0%	0.03	0.24	-9.7%	-9.7%	
Sub Total (Zone C)	1.34	1.48	2.81	0%	0.00	0%	0.00	2.81	0%	0.5%	0.07	1.5%	0.04	2.70	-3.9%	-3.9%	
Other Outside PCA																	
Zone H -NORTH WEST LEICESTERSHIRE																	
Ashby-de-la-Zouch	0.99	31.31	32.30			5%		32.30	0%			5.0%	0.13	32.17	-0.4%	-0.4%	
Ashby-de-la-Zouch Town Centre Sub-Total	4.95	31.31	36.26	0%	0	5%	0	36.26	0%	0.0%	0.00	5.0%	0.13	36.13	-0.4%	-0.4%	
Aldi, Dents Road, Ashby-de-la-zouch	11.58		11.58	10%	1.28		0.00	10.30	-11%	8.0%	1.15			9.15	-10.0%	-21.0%	
Tesco, Resolution Road, Ashby-de-la-zouch	28.04	3.20	31.24	3%	0.38	2%	0.03	30.82	-1%	12.0%	1.73	10.0%	0.26	28.83	-6.4%	-7.7%	
Nottingham Road Retail Park, Ashby-de-la-zouch		0.13	0.13					0.13	0%			2.0%	0.05	0.08	-39.3%	-39.3%	
Sub Total (Zone H)	44.57	37.57	82.13	13%	1.66	7%	0.03	80.44	-2%	20.0%	2.88	17.0%	0.44	77.11	-4.0%	-6.1%	
Total	237.72	413.79	651.51	100%	12.76	100%	1.65	651.59		100.0%	14.42	100.0%	2.60	634.57			

Notes:

- Existing Turnover at 2024 taken from Table 4b and 5b.
- Trade diversion associated with Lidl Swadlincote (commitment) based on Pegasus assumptions in absence of any submitted trade diversion patterns relating to the replacement store planning application.
- Trade diversion associated with proposed development based on Pegasus assumptions.
- 2013 prices.