



SEQUENTIAL TEST & RETAIL IMPACT ASSESSMENT

SWARKESTONE NURSERY AND GARDEN CENTRE



The background of the entire page is a detailed, isometric line drawing of a cityscape. It features various building styles, including modern skyscrapers and older, more traditional structures. Streets with cars and pedestrian crossings are visible, creating a sense of a busy urban environment. The drawing is in a light teal color, matching the overall theme of the document.

SEQUENTIAL TEST & RETAIL IMPACT ASSESSMENT

On behalf of: Swarkestone Nursery and Garden Centre

In respect of: Swarkestone Garden Centre

Date: SEPTEMBER 2025

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Introduction

- 1.1 This sequential and retail impact assessment statement has been prepared in support of the application for the redevelopment and extension of Swarkestone Nursery and Garden Centre (Use Class E) with associated parking, as required by Policy RTL1 of the South Derbyshire Local Plan.
- 1.2 Swarkestone Nursery and Garden Centre is an existing garden centre facility selling a wide range of plants and plant products, as well as associated home and garden furniture and accessories. It also features The Garden Restaurant.
- 1.3 A schedule of existing and proposed floorspace at the application site is attached at **Appendix 1**. Existing floorspace at the site currently comprises 7,978sq.m. gross of which 3,350sq.m. is retail floorspace. An overall increase of 8,779sq.m of retail floorspace is proposed across the site, broadly consisting of the following:
 - Additional outdoor retail concessions of 851sq.m.
 - An additional outdoor aquatics concession of 120sq.m.
 - Indoor retail concessions 1-9 of 2,134sq.m
 - A 'Rovero' glasshouse of 2,000sq.m.
 - An extension to the existing garden centre shop of 2,527sq.m.
 - Indoor Concessions A, B and Aquatics of 637sq.m.
 - A foodhall of 510sq.m.
- 1.4 In addition, a number of ancillary facilities are proposed including outdoor play areas, an indoor play area and an extension to the restaurant's internal area and external seating area.

2.0 Sequential Test

- 2.1 This planning application proposes the redevelopment and extension of the existing garden centre and nursery (Class E) to include the erection of a food hall, restaurant and concessions (Use Class E) with associated parking at Swarkestone Nursery & Garden Centre, Swarkestone, South Derbyshire, DE73 7GQ.
- 2.2 In accordance with Paragraph 91 of the NPPF and policy RTL1 of the South Derbyshire Adopted Local Plan a Sequential Assessment of sites has been prepared to support the application.
- 2.3 Section 1 of this document addresses the sequential assessment, first dealing with the scope of the assessment and defining its interpretation through case law; followed by an assessment of any sequentially preferable sites.
- 2.4 Section 2 of this document then considers the proposed development in relation to national and local retail planning policy in line with guidance set out in Section 7 of the NPPF entitled 'ensuring the vitality of town centres' and provides a Retail Impact Assessment to determine the impact of the development on the vitality and viability of nearby centres and future public or private sector investment.

The Requirement for the Sequential Assessment

- 2.5 The application seeks the redevelopment and extension of Swarkestone Nursery & Garden Centre to provide extended growing areas and sales areas, a food hall, additional concessions, and restaurant, together with associated parking. As the site is located 2km away from the nearest defined centre for retail purposes, which is Chellaston District Centre, it is necessary to demonstrate compliance with the sequential approach outlined in paragraphs 91 and 92 of the NPPF. Consequently, it is necessary to demonstrate that there are no suitable, available and viable sequentially preferable sites that could accommodate the proposed development in accordance with the relevant provisions of both local and national planning policy. On the basis that the site contains a nursery (proposed to be extended) which grows many of the plants that are sold on site, it is illogical to seek to separate the proposed development from the remainder of the site. Nevertheless, a robust approach has been taken to undertaking a sequential assessment.
- 2.6 In undertaking the sequential assessment, it is important to establish an appropriate area of search. For a development of this nature and size, it is considered that a 15-minute drivetime from the site is acceptable and that this constitutes the proposed development's Primary Catchment Area (PCA). As such, it is considered appropriate and proportionate (in line with the guidance of the PPG) to use the PCA as the outer edge of the sequential search area. It is also necessary to consider existing garden centres within the locality. A map of the PCA is attached at **Appendix 2**
- 2.7 In light of the above, and due to the location of the site close to the local authority border, Derby City Council (DCC) and South Derbyshire District Council (SDDC) centres have been assessed in sequential terms. DCC centres include Sinfin District Centre, Chellaston District Centre and Allenton District Centre. SDDC centres include Willington, Repton, Ticknall, Melbourne, Weston on Trent,

Aston on Trent, Findern, Boulton (future) and Highfields Farm (future). Due to the SDDC centres not being given a defined boundary on SDDC's policy maps, each village has been assessed as a whole.

Case Law

- 2.8 It is important at the outset to correctly interpret and apply the sequential test, considering best practice and relevant appeal decisions. The NPPF has removed the specific need to address disaggregation and is supported by the absence of any reference to disaggregation in the updated Planning Policy Guidance Notice issued in 2020.
- 2.9 Case law on the issue of disaggregation and the sequential approach can be summarised as follows:
- The Supreme Court Decision in 2012¹ re Dundee established as a matter of law, that a site has to be suitable for the commercial needs of the operator and that provided that flexibility has been shown in terms of format and scale then a proposed development should not have to be altered or reduced to fit a site.
 - The English application of Dundee was established in 2012 through High Court case of North Lincs.² The decision maker is 'bound' to take the Applicant's assessment that a site is neither commercially viable nor suitable for their commercial requirements.
 - 2014 Rushden Lakes High Court Decision³ established that the Secretary of State agrees that the sequential assessment relates to the accommodation of the proposal.
 - The more recent Scotch Corner decision (2016)⁴ also a Secretary of State decision established that there was no express requirement to disaggregate the scheme and that the sequential test seeks to determine whether if what is proposed can be accommodated on a town centre or sequentially preferable site.
- 2.10 As such, in considering the requirements of the sequential test, we have considered the application proposals as a whole, whilst applying a reasonable degree of flexibility in terms of scale and format, as required by national policy.

The Scheme to be Assessed

- 2.11 The context for the sequential assessment is that the proposed garden centre extension and associated development would have a net additional sales area of 8,779sq.m, with an overall proposed new area of 12,129sq.m. In addition, the store is to be served by an extended car park consisting of 463 spaces, plus an overspill for 115 spaces, and associated land required for

¹ Tesco Stores Limited v Dundee City Council (Scotland) (2012) UKSC 13, 21 March 2012).

² R. [on the application of Zurich Assurance Limited trading as Threadneedle Property Investment] v North Lincolnshire Council and Simon Developments Limited [2012] EWHC 3708 [Admin].

³ Land adjacent to Skew Bridge Ski Slope, Northampton Road, Rushden decision dated 11 June 2014 (reference APP/G2815/V/12/2190175).

⁴ Land at Scotch Corner, North Yorkshire, "called-in" application decision dated 1 December 2016 (reference APP/V2723/V/15/3132873 and 16/3143678).

servicing/deliveries. The existing car park consists of 45 formally marked out spaces, with an additional non-marked out area which can hold a minimum of 70 cars. As such, the proposed development represents an increase of approximately 348 additional spaces, plus the overfill.

- 2.12 In total, the functional land required to deliver the proposed development (excluding grassed areas and landscaping) amounts to approximately 6.9 hectares. It is acknowledged however that where units are identified within or on the edge of local centres which benefit from existing on-street parking or good public transport access, these could be suitable too; as a result, the sequential search exercise has also assessed smaller sites in such locations rather than dismissing them in the initial site sift exercise.
- 2.13 The applicant has an immediate need for the redevelopment and associated development therefore any potential site needs to be available prior to Q3 of 2026. The client also requires a site that provides good visibility from main highways in order to attract passing trade and provide easy and legible access into the garden centre and associated car park.

Methodology

- 2.14 The parameters for the sequential search are set out below.

Size Requirements	
Minimum suitable site area	2 hectares for a standalone store (based on proposed floorspace. 6.5 hectares for a mixed-use development.
Unit Size	Food hall – Required size: 510 sq.m (± 10%) Restaurant – Required size: 1,200 sq.m (± 10%) Concessions – Minimum size of 200 sq.m (± 10%) Garden Centre – Required size of 5,325 sq.m (± 10%)
Vacant Units (for conversion/occupation)	Units at least 90% of the proposed unit size
Other Requirements	
A site that can allow for the safe manoeuvring of customer vehicles.	
A site that is able to offer adjacent surface level car parking (or multi-storey with appropriate lifts) so that customers can easily transfer plants and other heavy goods to their vehicles.	

A site that can accommodate a dedicated service area and associated HGV manoeuvres and deliveries.

A single storey unrestricted sales floor which benefits from a generally level topography, or which has the ability to be developed as such.

- 2.15 As set out above, Case law confirms that the sequential search has to assess sites for the development that is proposed. However, in order to provide the most robust assessment, sites were also assessed that could accommodate the other constituent parts of the proposal, ie. the restaurant, food hall and concession areas.
- 2.16 Vacant sites were identified through online marketing databases such as Rightmove, Property link, Zoopla, PrimeLocation and OnTheMarket; through the online websites of commercial agents such as JLL, Carter Towler, Ryden and Knight Frank; and based on local knowledge of the district and the availability and history of a number of potential sites. DPP also looked for potentially vacant units as part of the physical health checks undertaken in September 2023.
- 2.17 We have also reviewed Local Plan allocations within or on the edge of defined centres in the sequential search area.
- 2.18 Thus, in accordance with the retail hierarchy, the following centres were assessed:
- District Centres:
 - Sinfin District Centre
 - Chellaston District Centre
 - Allenton District Centre
 - Undefined Centres:
 - Willington
 - Repton
 - Ticknall
 - Melbourne
 - Weston on Trent
 - Aston on Trent
 - Findern
 - Edge of Centre Boundaries
- 2.19 Any identified sites were then assessed based on their capacity to accommodate the proposed development **as a whole** in accordance with the ‘Dundee’ approach cited above. Any site that is not capable of accommodating the proposed development, in terms of physical size, cannot be considered suitable.
- 2.20 Should any sites be found to be suitable, they will also need to be sufficiently available and viable for development. For example, sites must be actively marketed as available for development/occupation.

Sequential Sites

Sinfin District Centre

- 2.21 Our health check discovered that there were two vacant commercial properties within Sinfin District Centre. These properties are listed online:
- Unit 17, Sinfin District Centre, DE24 3DS ([Unit 17](#)) – ~~to let~~ The property was, prior to closure, a beauty salon called Real Hair and Beauty. The unit is approximately 86sq.m in size. The property is not available as it is not advertised for sale or lease, and it is also not suitable due to its limited size.
 - Unit 16, Sinfin District Centre, DE24 3DS – This property was occupied by Thomas Cook, a travel agency that is now permanently closed. The unit is approximately 200sqm in size and therefore is not suitable. The property is also not available as it is not advertised for sale or lease.
- 2.22 Given the above, there are no vacant sites within Sinfin District Centre that are suitable, available or sequentially preferable.

Chellaston District Centre

- 2.23 Our health check discovered that there was one vacant commercial property available within Chellaston District Centre that was advertised for lease on the site and online:
- Swarkestone Road, Chellaston, DE73 5UA – ([Swarkestone Road Chellaston](#)) – This property is a pub advertised for lease located within the centre of Chellaston. The property will retain the existing business following the sale and therefore it is not available for the proposed development. In addition, the planning challenges involved in moving away from a pub use means that the unit is also not suitable.
- 2.24 In addition to this, four properties were advertised on online marketing websites, but no signage was present during the health check:
- 32 High St, Chellaston, DE73 6TD – ([32 High St Chellaston](#)) – This is a mixed used commercial / residential property for sale. The area contains 64sq.m of floor space therefore the unit is too small for standalone concessions. It also has residential constraints due to the apartment above and has limited parking options. The sales particulars note that the building is for sale but not the business. As such, it is not a suitable site.
 - 55-57 High Street, Chellaston, DE73 – ([55-57 High Street](#)) – This property is listed as a retail premises to let. The listed size is 171sq.m so therefore it does not meet the size requirements.
 - 59 High St, Chellaston, DE73 6TB – ([59 High St](#)) – This property is listed as a retail premises to let. The listed size is 88sq.m so therefore it does not meet the size requirements.
 - 215 Derby Road, Chellaston, DE73 5SE – ([215 Derby Road](#)) – This is a mixed use commercial / residential property for sale. The size is not listed. It has residential constraints due to the apartment above and has limited parking options. As such, it is not a suitable site.

- 2.25 Given the above, there are no sites within Chellaston District Centre that are available, suitable or sequentially preferable.

Allenton District Centre

- 2.26 Our health check discovered that there are no sites within Allenton District Centre however there was one vacancy found online:
- 412 Osmaston Road, Allenton, DE24 8AH – ([412 Osmaston Road](#)) – This is a mixed commercial / residential unit. The commercial floorspace is 69sq.m which falls outside the size requirements. As such, it is not a suitable site.

Willington

- 2.27 Our health check discovered that there were no vacancies at Willington Centre however there was one vacancy found online:
- The Green, Willington, Derby, Derbyshire, DE65 6BP - ([The Green](#)) – This property is advertised as a retail premises for sale. The property would fall outside the size requirements for the applicant as the property is 72sq.m total net internal area, and it is therefore not suitable.
- 2.28 There are therefore no available, suitable or sequentially preferable sites within Willington.

Repton

- 2.29 Our health check discovered that there were no vacancies at Repton Centre and no vacancies were found online or with local agents. As such, no sites are available.

Ticknall

- 2.30 Our health check discovered that there was one vacant commercial property present within the centre. This property was not advertised on site, online or with local agents:
- 32 Main St, Ticknall, DE73 7JZ – This property was known as Scoff & Shop, a local café, and had a retail floorspace of approximately 55sq.m. The property is not suitable due to its small size and as it is not advertised for sale or lease.

Melbourne

- 2.31 Our health check discovered that there was one property vacant in the centre. This property was not advertised on site, online or with local agents:
- 35 Market Pl, Melbourne, DE73 8HW – The property was previously known as Melbourne News and was a local newsagent of approximately 63sq.m. The property is not suitable as it is not advertised for sale or lease and would be too small regardless.
- 2.32 Online marketing databases have identified two vacancies in the centre:

- 71 Derby Road, Melbourne, DE73 8FE – ([71 Derby Road](#)) – The property is advertised as a ground floor retail premises to let. The area is 141sq.m. It is located under Turaa Indian restaurant. The property is not suitable as it does not meet the size requirements.
- Williams Yard, Melbourne, DE73 8JR – ([Williams Yard](#)) – The property is advertised as a retail space to let and is located within a building comprising 6 shops and 5 offices. The area of the property is 24sq.m and as such does not meet the size requirements.

2.33 Given the above, there are no suitable, available or sequentially preferable sites within Melbourne.

Weston on Trent

2.34 Our health check discovered that there were no vacancies at Weston on Trent Centre and no vacancies were found online or with local agents.

Aston on Trent

2.35 Our health check discovered that there were no vacancies at Aston on Trent Centre and no vacancies were found online or with local agents.

Findern

2.36 Our health check discovered that there were no vacancies at Findern Centre, and no vacancies were found online or with local agents.

Boulton Moor Future

2.37 Our health check discovered that there were no vacancies at Boulton Moor Future Centre and no vacancies were found online or with local agents.

Highfields Farm Future

2.38 Our health check discovered that there were no vacancies at Highfields Farm Future Centre and no vacancies were found online or with local agents.

Local Plan Allocations

South Derbyshire District Council

2.39 The South Derbyshire District Council Local Plan proposes three new Local Centres within a 15-minute drivetime of the proposal site. These consist of Boulton Moor, Chellaston Fields and Wragley Way. These are defined on the Policies Map via a pink dashed line and relate to three wider housing sites which have policy references H13, H14 and H15 respectively. These will now be discussed in turn.

Boulton Moor

- 2.40 Boulton Moor is an allocation designed to be a cross boundary sustainable urban extension to Derby City and consists of four sites. It is located adjacent to the A6 and is considered capable of delivering strategic levels of growth due to excellent transport links and nearby employment opportunities. Due to the location on the border of SDDC and DCC, it will also be discussed in the relevant paragraphs when looking at DCC allocations, however only the SDDC aspects will be discussed now.
- 2.41 The land allocated at Boulton Moor within SDDC boundaries will provide 1,950 dwellings over the lifetime of the Local Plan across three phases. Phase 1 (ref. 9/2005/0611) has gained planning permission for 1,058 dwellings, whilst Phase 2 (ref. 9/2016/0166) gained permission for an additional 550 dwellings. Phase 3 (ref. DMPA/2023/1271) is set to bring an additional 250 dwellings.
- 2.42 Policy H13 of the Local Plan and the approved Phase 1 development set out how Boulton Moor will be delivered and the scope of the non-residential proposals. These will include a petrol filling station, a medium sized foodstore, children's nursery, five small retail units, community building, and two restaurants with drive-thru capabilities. An extract of the proposed development is provided below. It can be considered that this development is progressing by virtue of the applications seeking to discharge conditions.

Table 1: Phase 1 of the Proposed Development at Boulton Moor



- 2.43 Part xiii of policy H13 states that the new district centre will be anchored by the supermarket and complemented by a range of smaller units which will provide for the day to day needs of the wider neighbourhood. In addition, part xiv states that the scale of the anchor store will be commensurate with the needs of the new community, and the level of growth anticipated, with it becoming the focal point of the allocation.
- 2.44 With the above in mind, it is evident that the supermarket and retail stores proposed consist of convenience retailers for food shopping and services that future residents will need on a daily basis, as per part xiii. This level of provision is therefore different to that proposed at the garden centre which will primarily consist of comparison goods such as garden wares, homewares, hobby items, DIY items and other higher value items that are bought less frequently. Given this, the proposed development is not considered to conflict with the aims of Boulton Moor district centre, the committed developments or policy H13.
- 2.45 In addition, it is not considered possible to locate the proposed development within the allocation without impacting on the future delivery of these community and convenience services or the future housing needs of SDDC and DCC.

Chellaston Fields

- 2.46 Chellaston Fields is located immediately to the north of the A50, accessed off Bonnie Prince Roundabout, and immediately south of the boundary of Derby City Council. Due to this close relationship with DCC, it also represents an urban extension to the city, however one that is entirely within SDDC's boundaries.
- 2.47 The allocation is represented by policy H14 of the Local Plan which sets out that 500 dwellings will be provided alongside retail development that is "*commensurate to the size of development and surrounding area*". An outline application was submitted in June 2012 under reference 9/2012/0568. Approval was granted in January 2015.
- 2.48 Progress has been made since the adoption of the Local Plan as the allocation has now been built out, with the commercial centre consisting of Aldi, Indigo Sun (tanning salon), Little Caesar's Pizza, Gregg's, and a drive-thru Costa Coffee. Similar to Boulton Moor, these units represent a different offer to that of the proposed garden centre development, with a focus on local needs and convenience goods.
- 2.49 Given this, and the fact that there are no available units representing a 100% occupancy rate, the proposed development will not jeopardise Chellaston Local Centre nor is it possible to locate the proposed development within the allocation.

Wragley Way

- 2.50 The proposed allocation at Wragley Way, Land to south of Sinfin, is located immediately north of the A50. The proposed allocation is another cross-boundary location and urban extension to Derby City, though predominantly within SDDC boundaries. Again, only the allocation relating to SDDC will be discussed in this section, with DCC commentary to follow.
- 2.51 Policy H15 of the SDDC Local Plan sets out what the allocation will consist of, which is approximately 1,300 dwellings over the plan period, with scope for a further 650 beyond this. As per the previous allocations discussed, part vii of H15 sets out that a new on-site local shopping centre will be provided which should be commensurate in size to the needs of the community and be the focal point of the development.
- 2.52 As such, the intention of the allocation and policy is similar to that of Boulton Moor and Chellaston Fields in that the retail uses desired will be convenience retailers aimed at meeting the day to day needs of the new community, and not comparison retailers such as the proposed development.
- 2.53 At the time of writing, there is an ongoing outline planning application for this allocation for up to 1,850 dwellings, a two-form-entry primary school, a local centre (including community hall, retail & other local services & facilities), public house, drive-through restaurant, petrol filling station, strategic highway infrastructure. The application has been ongoing since 2019 under reference DMPA/2019/1097.

- 2.54 The new local centre is proposed to consist of up to 1,900sq.m and be located adjacent to Deep Dale Lane and a new junction with the A50. It is not clear when the outline application will be determined however, there is insufficient capacity to accommodate the proposed development without impacting upon SDDC's deliverability of future housing. In addition, the fact that the local centre is designed to solely address the needs of the future residents, it is likely to be convenience retailers which will not compete with the comparison goods of the proposed garden centre extension.

Derby City Council

- 2.55 DCC's Core Strategy (2017) sets out a range of allocations that fall within the primary catchment area of the proposed development. These allocations include a range of uses such as housing, retail and employment. For robustness, all of these areas have been considered to determine whether they can accommodate the proposed use, however only those within a sequentially preferable position are discussed.

Wragley Way

- 2.56 Policy AC18 of the Core Strategy sets out the allocation at Wragley Way which will work in tandem with policy H15 of the SDDC Local Plan as mentioned previously. The allocation within DCC boundaries will see the delivery of 180 dwellings with no retail uses being allocated. Instead, these are to fall within SDDC boundaries meaning that the needs of this allocation are being met elsewhere and any additional retail allocations would not only conflict with DCC's housing land supply but could also jeopardise the deliverability of that across the border.
- 2.57 As such, the proposed development will not impact on the allocation under AC18, nor is it possible to locate the proposed development within the allocation.

Boulton Moor

- 2.58 Policy AC23 of the DCC Core Strategy allocates land between Chellaston and Boulton Moor for residential development with a capacity of 1,000 dwellings. Much of the allocation is either built out or under construction, with numerous planning applications approved and therefore much of the land is committed to residential development and not available.
- 2.59 It is acknowledged that policy CP12 of the Core Strategy and part f of AC23 itself, does state that a new or extended centre will be delivered at Boulton Moor, but again this is to support the creation of the new community only.
- 2.60 Furthermore, the land is located immediately east of the Boulton Moor allocation under policy H13 of the SDDC Local Plan. Policy H13 explicitly sets out the new local centre for the wider development and this is referenced within DCC's policy AC23 with paragraph 6.23.9 stating that *"the new local centre, located on the phase 1 site in South Derbyshire will act as a focal point a the heart of the new community providing for the day-to-day needs of the wider neighbourhood... this should be complemented by small scale local facilities on the Snelsmoor Grange site"*.

- 2.61 As such, it is again clear that the SDDC Boulton Moor allocation is the local centre and that this, alongside any Snelsmoor Grange retail, will be solely convenience retailers and not comparison as per the proposed development. The proposed development will therefore not impact on the deliverability of these uses.
- 2.62 Furthermore, the current progress of the allocation and the aforementioned need to not prevent community and retail facilities from coming forward as discussed in the SDDC commentary means that it is not possible to locate the proposed development to within the allocation.

Conclusion

- 2.63 To conclude the Sequential Test, there are no sites identified in the search area which fulfil the criteria to accommodate the application proposals, even when demonstrating a reasonable degree of flexibility in the format and size of the proposed development.
- 2.64 In addition, there were no suitable vacant units being marketed across the district and undefined centres and therefore we consider, given the above, this gives a suitable interpretation and application of the sequential approach towards the site selection.
- 2.65 Furthermore, it has been demonstrated that there is no land available within any of the allocations that fall within either Derby City Council or South Derbyshire District Council boundaries within the search area given various levels of progress and the need for the provision of services for the new communities being created.
- 2.66 In addition, the proposed development will not compromise the proposed retail uses within the allocations given that they consist of convenience retail aiming to meet the day to day needs of the existing and future communities.
- 2.67 As a result, it is considered that the sequential test is passed.

3.0 Retail Impact Assessment

Introduction

- 3.1 Paragraph 94 of the NPPF advises that retail applications outside of designated retail centres should be accompanied by a retail impact assessment if the proposed floorspace is greater than 2,500sq.m, unless a locally set floorspace threshold is set.
- 3.2 The NPPF requires an assessment of the impact on existing, committed and planned public and private investment in a centre or centres, and the impact of the proposal on town centre vitality and viability, including local consumer choice and trade.
- 3.3 Policy RTL1 of the South Derbyshire Local Plan (part 2) sets a local threshold for retail impact assessments of 1,000 sq.m. gross. As such, a full retail impact assessment of the proposal has been undertaken.

Methodology

- 3.4 Paragraph 2b-017 of the NPPG sets out a step-by-step approach in the preparation of Retail Impact Assessments, as follows:
 - Establish the state of existing centres;
 - Establish existing shopping patterns and the no development scenario;
 - Determine the appropriate time frame for assessing impact focusing on the first 5 years;
 - Assess the proposal's likely turnover;
 - Set out the likely trade draw of the proposal; and
 - Consider the likely impact of the proposal.
- 3.5 Reference has been had to the Derby City Council Retail and Centres Study ('The Retail Study') in the preparation of this Impact Assessment. On this basis, all values in this report are expressed in a constant 2017 price base, for parity. A number of retail tables accompany this report and are contained at **Appendix 3**. In accordance with NPPG, impact of at least 5 years ahead has been assessed. As such the 'base' year is 2025, whilst impact has been tested at 2030.

Catchment Area

- 3.6 There is no firm guidance on the extent of a catchment area for a proposed development, however it is reasonable to establish a catchment area based on the type of development proposed, the context of the surrounding area (including existing shopping provision) and the scale of the development.
- 3.7 In this context, the proposed development is for the redevelopment of and an extension to an existing, well-established garden centre and nursery. It is widely accepted that such a use falls within the category of 'bulky goods'. This, coupled with the out-of-centre location means that most, if not all customers would access it by car. It is also assumed that such a proposal would have a relatively wide catchment area. As set out above, the Primary Catchment Area for the purposes of

the Sequential assessment is based on a 15-minute drive time. In retail impact terms however, it is accepted that the proposal would divert trade from competing facilities that are further away.

Population and Expenditure

- 3.8 In terms of establishing the amount of available expenditure within a determined area, the application site sits within **Zone 17** 'South Derbyshire' whilst the natural catchment area of the proposal is likely to include parts of **Zone 5** South Derby and **Zone 19** Burton upon Trent. See Study Area Map from Appendix 1 of the Retail Study, at **Appendix 4** of this report. On this basis, resident and projected population and corresponding comparison expenditure figures for Zones 5, 17 and 19 are contained within **Tables 1-3** in Appendix 3. These show an overall increase in population in all 3 zones and a corresponding increase in comparison expenditure. Growth rates for comparison expenditure show a sharp dip between 2020 and 2021, reflective of the global pandemic, before then returning to steadily increase. Allowance has been made for comparison expenditure not spent in physical shops (referred to as Non Retail forms of Trading or NRFT); this has been removed from the figures in line with accepted methodology. Within Zone 17, available expenditure is set to rise from £157m in 2025, to £160m in 2030, with a further rise to £210m in 2033.

Turnover of the Proposed Development

- 3.9 As noted above, Table 20 of the Retail Study actually generates a turnover figure for the existing Swarkestone Nursery of £0.3m (at 2019 base in 2017 prices). This figure has been checked with the site operators who have confirmed that the retail turnover of the garden centre is just under £2.5m, in current prices. This figure has then been converted to a 2017 price base, using the Price Indices in Appendix 4B of the Retail Planner Briefing Note 21. The resultant figure of **£2.06m** has been used as a starting point for **Table 4** at Appendix 3 which calculates the estimated turnover of the proposed development. In terms of the proposed additional floorspace, an average sales density figure of £974, derived from published figures for comparable operators as listed in Retail Rankings 2022, has been applied to the retail floorspace, resulting in a total estimated turnover of £13.71m (at 2030 in 2017 prices). For the purposes of assessing impact, only the additional retail floorspace has to be considered; this results in an additional turnover figure of £11.32m. As explained in the footnote to the table, growth in turnover from the base year of 2019, through to 2030 has been assumed using growth rates contained within the Retail Planner Briefing Note 22.
- 3.10 In order to produce a more fine-grained trade diversion and impact exercise, Table 5 shows the assumptions that have been made regarding how much of the proposed development's turnover will come from residents living in various zones. Just over half of the development's turnover is estimated to come from zone 17 where it is located. This is a large, mainly rural zone and not all residents who are more distant will visit the facility, in view of existing, comparable facilities. As such, it is also assumed that residents in the southern part of the main Derby urban area (zone 5) and residents to the south-west will also use the site. A percentage of the proposal's turnover (10%) is assumed to be drawn from further afield.

Existing Shopping Patterns

- 3.11 The Retail Study provides insight into existing shopping patterns on the various categories of comparison goods, from the Household Survey data which underpins it. Table 19 at Appendix 9 looks specifically at DIY and gardening goods shopping patterns. Whilst it is acknowledged that the application proposal would sell a range of goods, the primary purpose of the site will remain as a garden centre and nursery and hence this is considered to be the most representative data. For Zone 17, the key patterns shown can be summarised as follows:

Zone 17 Destinations	DIY/Gardening Shopping
Derby City Centre	3.1%
B&Q Supercentre, Osmaston Park Road	21.3%
Ascot Drive Derby	9.1%
Wyvern Centre, Chaddesden	14.3%
Bardils Garden Centre, Stapleford	1.9%
Swarkestone Nursery (the application site)	1.3%
Kingsway Retail Park, Derby	2.2%
Wickes, London Road, Alvaston, Derby	1%
Ashby de la Zouche Town Centre	1.5%
Swadlincote Town Centre	1.8%
Burton up on Trent Town Centre	0.9%
Shepshed Town Centre	1.0%

- 3.12 As can be seen, Table 19⁵ also shows that Zone 17, as a whole contains no key destinations for gardening and DIY shopping, apart from Swarkestone Nursery itself. As well as attracting 1.3% of

⁵ Note that there are two Table 19's in the Study which are incorrectly labelled. This is the first one. The second Table 19 is actually Total Comparison Expenditure.

the available comparison expenditure on this goods type from residents living within Zone 17, the application site also attracts 1.5% of comparison expenditure from residents living in Zone 3 (South West Derby). No other facilities within the zone attract residents from outside the area. In other words, there is no inflow of this type of expenditure. The only other facility within Zone 17 which is cited as a destination for these goods by residents living in that zone, is Shepshed Town Centre (both the application site and Shepshed denoted as being within Zone 17 by pale blue wash in the table above).

- 3.13 In total, Zone 17 captures just **5%** of the available comparison expenditure on DIY and gardening goods. Table 20 converts this in monetary terms to **£0.9m** (base figure at 2019 in 2017 prices). As would be expected, in view of its proximity to the main Derby urban area, the majority of expenditure on DIY/Gardening goods is being spent within facilities in Derby City Centre and the main urban area, most notably the various out-of-centre facilities.
- 3.14 Using the Retail Study data, comparison goods turnover of the main stores and centres are shown in **Table 6** at Appendix 3. This exercise has been limited by the fact that the Retail Study does not generate a turnover for a particular store or centre if no respondents stated that they visit it for comparison shopping. As the Study covered a very large area and picked up each type of comparison goods type individually, we consider that an absence of turnover confirms that a centre does not perform as a comparison-shopping destination. There could therefore be no impact on them from this development.
- 3.15 Table 6 shows that Derby City Centre is by far the strongest comparison-shopping destination, as befits its position in the hierarchy as a major City Centre. As per Table 4, turnover growth rates have been applied in line with the RPN 20 and, despite significant contraction of comparison goods growth in 2020 and 2021, due to the pandemic, the City Centre is forecast to have a comparison goods turnover of £765m in 2030. Kingsway Retail Park and the Wyvern Centre, both out-of-centre destinations in the main Derby urban area, are the next most significant destinations, estimated to have turnovers of £237m and £104m respectively, in 2030.
- 3.16 Within the PCA, Sinfon District Centre has the most significant comparison-shopping turnover, at £27.51m in 2030, followed by Allenton with £10.33m.

Trade Diversion and Impact

- 3.17 The assessment of trade diversion can be seen in Table 7. In considering trade diversion, a number of commonly held assumptions underpin it:
 - Like competes with like – so stores operating in the same segment of the market will have trade diverted from them;
 - Garden centres fall into the ‘bulky goods’ category and are widely accepted as being complimentary to main town and district centres;
 - Customer shopping patterns are influenced by proximity to home and ease of access;

- 3.18 Table 7 incorporates the actual shopping patterns for DIY and Gardening goods in each of the 3 zones that fall within the Primary Catchment Area of the proposed development. Whilst not a comprehensive list, there are some clear patterns which have gone on to inform trade diversion assumptions as follows:
- Zone 5 is completely dominated by the B&Q at Osmaston Park Road which captures nearly 70% of all expenditure in Derby. It also captures 21.3% of the expenditure from zone 17, where the application site is located, and is again the single biggest destination.
 - Within Zone 17, the second most popular destination is the Wyvern Centre which includes a Sainsburys Homebase
 - In zone 19, which covers an extensive area but extends into what would be considered this proposal's catchment area, just over 77% of expenditure is spent in the various facilities in Burton upon Trent town centre, and the B&Q at Burton which sits close to, but not within, the centre.
 - The closest district and local centres to the application site perform a very localised role in terms of this expenditure and capture very little of the expenditure.
 - Existing garden centres in the PCA do not appear to capture much DIY/Garden expenditure.
- 3.19 From these shopping patterns an assessment has then be made as to how likely people are to divert to the application proposal, based on distance from home and range of goods on offer. For example, the B&Q is to the north of the PCA. Many people within Zone 5 will be as close, if not closer to the application proposal. In addition, anyone visiting the B&Q from Zone 17 would need to pass the application site to get there. It is fair to assume therefore that the application proposal will divert significant amounts of trade from the B&Q. The same is true of the Wyvern Centre.
- 3.20 It is assumed that the application proposal will also derive a significant amount of its turnover from trade diverted from Derby City Centre, from all 3 zones, due to the potential overlap in goods types.
- 3.21 Trade diversion patterns in zone 19 are reflective of the fact that Burton upon Trent is a significant draw. It will continue to retain the majority of its expenditure, but some zone 19 residents will divert to the application proposal if they live closer to it.
- 3.22 Turnover is also shown as being derived from competing garden centres throughout and beyond the PCA; all of these facilities are in out-of-centre locations and hence impact on them is not a material planning consideration.
- 3.23 Turning to nearby smaller scale centres, many of these do not feature as destinations identified by respondents in the Household survey for DIY/Gardening hopping. It is nevertheless acknowledged that some goods sold at the application site could be sold from these centres and hence an element of expenditure diverted. Most notably, the Asda at Sinfin, the Lidl at Chellaston and the general range of facilities available at Allenton. Some trade diversion from people living within zone 5 has therefore been assumed. Other centres such as Willington and Ticknall are very small and have no facilities within them from which trade could be diverted. An assumption has been made that some trade may be diverted from Melbourne from residents in zone 17, as it is a relatively large centre with a good mix of facilities.

Impact on Vitality and Viability

- 3.24 In percentage impact terms, it can be seen that the largest percentage impact is on a number of freestanding garden centres, such as the Dobbies at Findern. Such facilities are not protected by the Planning system; however, we would in any event suggest that the turnovers of these centres are not accurately represented by the Household survey results. It appears that Dobbies has acquired the Findern Garden Centre since the Household Survey was undertaken in 2019 and its turnover now is likely to be much larger.
- 3.25 Health checks of all relevant centres are attached at Appendix 5. These have been undertaken in line with the indicators set out in national planning guidance. As can be seen, all of the centres are considered to be relatively healthy in terms of vitality and viability. This is reinforced by the findings of the Derby Retail Study and in the case of the District Centres in the PCA, there has generally been a marked improvement in terms of vacancy levels (all of which are below the national average), number of units and anchor tenants. As such, the very low levels of impact shown in Table 7 do not constitute impact of a significant adverse level on any centre.
- 3.26 It should also be noted that the turnover of the three nearest district centres shown in the tables only relates to comparison goods turnover. The actual turnover of the centres will be higher once convenience (food) goods turnover is included. This is particularly pertinent at centres which have a key foodstore anchor, such as Sinfen and Chellaston. As such, the percentage impact levels shown in the Table are artificially high and very much represent a worst-case scenario.

Impact on Future Investment

- 3.27 As set out in the sequential assessment above, there is some notable planned investment in the PCA, albeit this is in the shape of proposed local centres. In any event it has been set out that in all cases, these are for convenience led, local shopping provision, relevant to the community the centre is designed to serve. Bulky comparison goods shopping will not prejudice the delivery of these local centres.
- 3.28 We are not aware of any private or public sector investment within Derby City Centre which would be impacted by this proposal. All of those proposed or anticipated, such as the Derbion Masterplan, relate to residential, leisure or redeveloping existing assets such as the markets and therefore will not be affected.

4.0 Summary and Conclusion

- 4.1 The Sequential and Retail Impact assessment has been prepared on behalf of Swarkestone Nursery and Garden Centre to support a planning application for the redevelopment and extension of the existing garden centre operation in accordance with national Planning guidance and Policy RTL1 of the South Derbyshire Local Plan.
- 4.2 The sequential assessment has demonstrated that there are no sequentially preferable sites, in either availability or suitability terms, within or on the edge of any designated centres in the PCA. Case law that requires a site to be able to accommodate the development that is being proposed, or 'something similar' should be remembered by the decision maker. In any event however, our assessment has included a thorough review of all available units that could accommodate different components of the scheme.
- 4.3 The assessment has confirmed that the impact on the designated centres within the PCA, as well as more distant locations, would be negligible and would not harm the vitality and viability of those centres. The majority of the application proposal's turnover will be derived from trade diverted from key out-of-centre facilities with Derby urban area which dominate comparison goods expenditure in this area and, to a lesser extent, Burton upon Trent. We are also unaware of any impact on existing, planned or committed private or public sector investment in any of these centres that would be impacted. Conversely the proposed development constitutes a major investment and will increase consumer choice within the area.
- 4.4 Overall, it is considered that both the sequential test and the Retail Impact Assessments as set out within the NPPF has passed. On that basis there can be no objection to the proposal on retail policy grounds.