

INITIAL RETAIL AUDIT

Full planning application for the construction of a Class E foodstore (Lidl), associated access, car parking, servicing and landscaping

**Land at 10 Barnard Road
Bowthorpe
Norwich
NR5 9JB**

Prepared on behalf

of

Norwich City Council

May 2024

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1.0 INTRODUCTION

- 1.1 MWA has accepted an instruction from Norwich City Council (the 'Council') to provide independent advice in respect of the sequential and impact assessments submitted by Emery Planning on behalf of Honeyview Investments Ltd (the 'Applicant') in respect of the proposed development of a Class E food store at Barnard Road, Bowthorpe (App. No. 23/01615/F).
- 1.2 In this context Emery Planning on behalf of the Applicant has submitted the following documents:
- 'Planning and Retail Statement' (PRS)(December 2023)
 - 'Response on retail planning matters' (Response) (April 2024)
- 1.3 As far as the PRS also addresses a range of non-retail matters, we do not provide any comment.
- 1.4 The Council has also requested that we should examine and comment upon (as necessary) two letters of objection which have been submitted on behalf of third Partys. These comprise:
- Firstplan (January 2024) on behalf of Waitrose and Partners
 - Avison Young (March 2024) on behalf of ALDI Stores Ltd.
- 1.5 The two letters of objection raise objections to the planning application which include reference to matters outside the scope of this audit. As far as they raise comments on the application of the sequential and impacts tests we address these within our report.
- 1.6 Following this introduction, we summarise in Section 2 a description of the proposed development and the location of the application site. In Section 3 we address the requirements of the sequential test as required to be passed in accordance with Policies DM18 and DM22 of the Norwich Development Management Policies Local Plan (2014)(NDMLP) and paragraph 91 of the National Planning Policy Framework (December 2023)(NPPF)¹.
- 1.7 In Section 4 we comment on retail impact. In this context we note the Applicant's claim that the local threshold of 1,000 sq.m. gross internal (as set out in Policy DM18) is out of date and therefore the default threshold of 2,500 sq.m. gross² floorspace applies (PRS, paragraph 8.5), On this basis it is claimed that there is no requirement for an impact assessment given the proposed food store will comprise 1,949 sq.m. gross internal floor area. Policy DM18 remains part of the development plan and we have proceeded to assess the potential trading effects in accordance with the requirements of this policy. But in any event the Applicant has provided a retail impact assessment and even if it were to be concluded that Policy DM18 is out of date, this does not mean that retail impact is not a material consideration.
- 1.8 In Section 5.0 we provide comments in respect of the Third Party objections by Waitrose and Partners and ALDI Stores Ltd. In Section 6 we set out our overall conclusions.

¹ The Applicant accepts that the application site comprises an 'out of centre' location in retail policy terms (paragraph 6.36 of the PRS).

² As set out in paragraph 94 of the NPPF.

2.0 THE PROPOSED DEVELOPMENT

- 2.1 Section 2 of the PRS outlines the nature of the proposal. A single storey foodstore together with the provision of 120 car parking spaces is planned. The total gross internal area is 1,948 sq.m. gross internal with a net sales area of 1,331 sq.m. of which 1,001 sq.m. will be used for the sale of convenience goods. The balance of 250 sq.m. will be used for the sale of comparison goods.
- 2.2 It is confirmed that the proposed occupier (Lidl) operated a food store at Drayton Road approximately 5 kilometres to the east. This close in April 2023 on the basis of poor trading. It is confirmed that Lidl are actively seeking a replacement for the Drayton Road store on the basis that the latter served a 'distinctively different catchment.'

3.0 SEQUENTIAL SITE ASSESSMENT

(a) Introduction

- 3.1 Section 7 of the PRS addresses the Applicant's sequential site assessment on the basis that the application site comprises an out-of-centre location (PRS, paragraph 7.2). The PRS confirms at paragraph 7.6 that seven centres were identified (including Norwich Road, Costessey within the neighbouring local authority of South Norfolk) having regard to pre-application advice received from the Council. Paragraph 7.9 confirms that two other centres: Lodge Farm and Easton village have been discounted from the assessment on the basis that they lie on the periphery of the 10-minute drive time catchment and each contain very limited convenience goods floorspace. As a consequence they are not considered suitable or available to accommodate the type of food store proposed on the application site.
- 3.2 In addition the former Lidl store at Drayton Road is rejected on the basis that it falls within a different catchment area and large investment is required to improve its offering. As a consequence the relocation of the Lidl store on the Drayton Road site is viewed as being the most appropriate course of action.

(b) Sequential parameters

- 3.3 Paragraph 7.17 of the PRS confirms the 'parameters' which have been applied in assessing alternative sites. This includes a minimum site area of 2.1 acres (0.85ha) which can accommodate a minimum store size of 1,949 sq.m. (GIA) together with surface level car parking. It should also provide a single storey, open and unrestricted sales floor area.
- 3.4 In their letter dated 2nd April 2024 Emery Planning confirm that 'we have searched for sites that have an area of 1.89 acres (10% less than the application site area) and that can accommodate a food store with a size of 1,754 sq.m. (GIA)(10% less than the store size area'. However the application of such flexibility is not apparent in the PRS as is readily apparent from the assessment which is provide of alternative sites. For example, the assessment of Bowthorpe District Retail Centre is assessed on the basis that it could not provide a large enough site to accommodate a 1,949 sq.m. gross store with 122 car parking spaces. The ability to provide customers with accessible car parking (although not necessarily demised to the retailer) together with the provision of dedicated service areas, are noted and accepted. However given that the store would largely serve local needs and would be known by residents, the need for a prominent site with the ability to attract passing trade is not considered to be a key requirement for site selection and suitability.
- 3.5 Nor is it clear from the applied parameters (and having regard to paragraphs 7.10-7.12) that the assessment has had regard to the advice in paragraph 91 of the NPPF. This states that suitable and available sites should be assessed on the basis as to whether they could become available within a reasonable period of time. Paragraph 92 of the NPPF also advises that site assessments should also take into account out-of-centre locations which are well connected to a relevant town centre. It is not clear that the sequential assessment has been applied taking these two additional requirements into account.

(c) Assessment of alternative sites

Site 1: Bowthorpe District Centre

- 3.6 The PRS confirms that the area of the District Centre extends to 3.57 ha (8.1 acres) and contains 7,390 sq.m. of floorspace. It also accommodates 650 car parking spaces. The PRS notes that the centre contains a number of vacant units but these are too small to accommodate a food store of the required floor area.

Photograph 1: Bowthorpe District Centre



- 3.7 An examination of this centre indicates that it is particularly well served by surface level car parking. Although the PRS dismisses any potential to expand the centre through the construction of a new retail store, we note that with a total site area of approximately 3.6ha, with a building site coverage of approximately 40%, it has not been demonstrated that a 1,750 sq.m. GIA with shared surface level car parking, could not be accommodated as part of an extension to this centre. Currently all shops and businesses within the centre including the public house and health centre share car parking. Applying an appropriate degree of flexibility as required in the NPPF and PPG, it does not seem an essential requirement for a new food store to have its own dedicated car parking demised only to its customers when considering town centre sites such as Bowthorpe.
- 3.8 While any development would lead to the loss of some car parking, the proposed floor area together with associated servicing could be accommodated on approximately 0.25ha. In the absence of more detailed information as to the unsuitability or non-availability of land within the district centre including an assessment of car parking, we are unable to confirm that this centre can be discounted as a sequentially preferable and suitable location.

Site 2: The Larkham District Centre

- 3.9 This site contains an Aldi supermarket along with adjacent car parking. From our site visit there are no vacant units and other than the Aldi supermarket, all are of limited scale. The proximity of adjacent housing coupled with the road system prevents any material scope to expand this centre. We therefore agree that there are no sites which are currently suitable and available nor any which are likely to become so within a reasonable period of time.

Photograph 2: The Larkham District Centre



Site 3: Norwich Road, Costessey

- 3.10 This site is embedded within a residential area and contains a small Co-op supermarket together with limited car parking. The total area is estimated to be 0.4ha and even were a redevelopment considered appropriate and reasonable it would not provide sufficient space to accommodate a food store of approximately 1,750 sq.m. gross together with a reduced level of car parking. On this basis it is not suitable or available nor likely to become so within a reasonable period of time.

Site 4: Earlham West Local Centre

- 3.11 Earlham West comprises a Local Centre under Policy LC18. It includes a GP surgery and pharmacy which faces towards the retail and service uses, including (West Earlham library) to the west.

Photograph 3: Earlham West Local Centre



- 3.12 The northern part of the centre comprises dedicated student accommodation. While in combination the area encapsulated within the designated centre is sufficiently large to accommodate a food store of approximately 1,750 sq.m. gross, this is considered to be impractical. It would require large scale redevelopment of existing facilities including the doctor's surgery and GP which would have to be replaced off-site or within any scheme of redevelopment. There is no scope to expand the centre given the close proximity of adjoining housing, the junior school and Kings church to the east, Rochester Court (student accommodation) and Holy Apostles and St. Peter and St Paul Church to the south together with the road layout.
- 3.13 The redevelopment of the student accommodation within Shoemakers is equally unlikely given the nature and scale of the beneficial use such that overall we agree that this centre does not provide a suitable and available site either now or within a reasonable period of time. Nor do we believe that an expansion of the centre through the development of an edge of centre site, such as the West Earlham Junior School to the east, is realistic.

Site 5: University of East Anglia Local Centre

- 3.14 Policy LC26 identifies this as a Local Centre. However it is located within the University of East Anglia campus and is focused on meeting the needs of students and staff. Access to the general public is restricted and the site itself is not considered suitable for the development of a food supermarket aimed at meeting the needs of local residents. It is therefore not suitable and is not available.

Site 6: The Avenues Local Centre, Colman Road

- 3.15 This is a Local Centre under Policy LC19. It includes a Co-op store together with a range of small retail and service units (many with residential and other accommodation above) which are local east and west of Colman Road. The centre is served by off-road parking with access onto Colman Road. The centre is focused on serving local needs and adjoins residential areas to the south and is bounded by The Avenues to the north. The traditional and well established nature and design of this local centre effectively precludes any potential for redevelopment or expansion. It is therefore not considered to provide either now or within a reasonable period of time a site which would be suitable or available for the development of a food store with car parking.

Sites which are better connected with an existing centre

- 3.16 The Applicant has not provided any information on sites which are out-of-centre but which are better connected with the centres identified contrary to the requirements of paragraph 92 of the NPPF. Paragraph 011 (ID: 2b-001-20190722) of the PPG reaffirms this requirement:

Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.

- 3.17 Emery Planning make reference to this in their letter of 2nd April 2024 stating that sequentially preferable sites have been examined. However the PRS does not make any mention of which sites were examined and discounted despite an '...exhaustive search for sites' having been undertaken. Further information is requested to confirm that this policy requirement has been met. In this context we agree with the conclusion that there are no sites within or adjacent to Eaton District Centre.

Overall conclusions on the sequential test

- 3.18 Policy DM 18 'Promoting and supporting centres' requires for main town centre uses which are not within a defined centre (or allocated in the development plan) to comply with a sequential

site assessment. This is also required by paragraphs 91 and 92 of the NPPF. Policy DM 18 states that the sequential assessment must clearly demonstrate that the proposal could not be accommodated on any reasonable alternative and available site within or adjacent to a defined centre at an appropriate level of the hierarchy. Policy 6: 'The Economy' within the Greater Norwich Local Plan (March 2024) also confirms that new retailing will be subsequent to the sequential approach.

- 3.19 Having regard to the submitted assessment we do not believe that the Applicant applying flexibility as required by paragraph 92 of the NPPF in terms of format and scale, has adequately discharged the requirements of Policy DM 18. In particular it has not been demonstrated that there are no suitable or available sites within a reasonable period of time which would secure the construction of a new food store as part of Bowthorpe District Centre. The construction of a new food store in terms of scale and function would be consistent with the requirements of Policy DM 21 'Protecting and supporting district and local centres' and could potentially be accommodated without involving the significant loss of retail floorspace or surface level car parking. The Applicant has not provided sufficient information to demonstrate that this centre does not contain a suitable and available site for the development of a 1,750 sq.m. (GIA) store with shared car parking. For example it is not clear whether the owner of the centre has been approached in relation to site availability.
- 3.20 In arriving at this conclusion we are mindful of the advice in paragraph 013 (ID: 2b-013-20190722) of the PPG which confirms that promoting new development on town centre locations can be more expensive and complicated than building elsewhere. And we are cognisant of the judgment *Aldergate Properties v Mansfield District Council* (2016). However the main basis for rejecting Bowthorpe District Centre appears to be the loss of car parking linked to inability to provide demised car parking for a food store operator such as Lidl.
- 3.21 In addition the Applicant has not provided information confirming which sites have been assessed to meet the requirements of paragraph 92 of the NPPF and paragraph 011 of the PPG that are better connected to existing centres.

4.0 RETAIL IMPACT

- 4.1 Notwithstanding the Applicant's claim that an impact assessment is not required because the Local Plan is not up to date. Section 8 of the PRS outlines the methodology and conclusions in relation to the potential trading effects. The methodology set out in paragraph 8.8 follows the advice in paragraph 018 (ID:2b-018-20190772) in the PPG 'Town Centres and retail' (2014³). However as we describe the assessment of trade draw rates and the concomitant impacts on existing centres/stores does not appear to be based on an adequate exposition of the 'no development' scenario. Thus while we acknowledge the need for an impact assessment to be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible⁴, we are unable to draw firm conclusions on the predicted impacts without further and updated information being provided by the Applicant.

Price base and base and design years

- 4.2 The assessment uses a constant 2020 price base. The base date is 2023 and a design year of 2028 is used to assess impact i.e. 5 years after the base date. The PPG advises in paragraph 018 (ID:2b-018-20190772) that the design year for impact testing will need to be selected to represent the year when the proposal has achieved a 'mature' trading pattern. This is conventionally taken as the second full calendar year after opening. It is not clear when the food store would open but we have assumed for the purposes of the assessment and given the existing beneficial use of the site that a new store could potentially open in 2026 in which case the first full trading year would be 2027. However in reality the difference between 2027 and 2026 would be marginal in assessing the likely trading effects.

Catchment area

- 4.3 A 10-minute drive time catchment has been adopted which in this location we consider to be reasonable. However since the population within this catchment is not provided nor any base and design year convenience goods expenditure generated by residents, it does not provide a clear basis for establishing base and design year shopping patterns prior to the new store opening.

Use of data within the Greater Norwich Town Centres and Retail Study Update (2020)

- 4.4 As far as we are aware this study remains part of the evidence base which underpins the development plan including the recently adopted Greater Norwich Local Plan (March 2024). Given the advice within the PPG that any assessment should be proportionate in scope, we do not believe that it is unreasonable to rely upon it provided data is updated. Specifically in relation to expenditure per capita on convenience goods and special forms of trading (SFT).

Convenience goods expenditure

- 4.5 Paragraph 8.10 of the PRS confirms that population and expenditure growth data has been sourced from Experian Micromarketer and Experian Retail Planner Briefing Note 19 (January 2022). However Experian published in February 2024 RPN 21. This updates the forecast growth in convenience goods expenditure including the percentage attributable to non-store sales i.e. special forms of trading. These have materially altered from those in the 2017 study and in terms of per capita growth rates for the period 2023-28 these are materially lower than those set out in RPN 19 and the PRS. Nor is it clear whether the changes to SFT have been included when compared with those used in the 2020 study.
- 4.6 Since these inputs are within the remit of the Applicant (and assuming population forecasts remain robust), the PRS does not in our opinion represent a 'worst-case scenario' because RPN 21 suggests that convenience goods expenditure per capita will continue to fall. Thus there is no certainty as suggested by the Applicant in the letter from Emery Planning (April

³ As amended.

⁴ PPG 'Town centres and retail' - Paragraph 017 (ID: 2b-017-20190722)

2024) that in practice ‘...there is likely to be some growth in the convenience goods turnover of defined centres and existing retail destinations’. We do not believe that the Applicant has demonstrated that this would in fact be the case over the 5 year period 2023-2028. This has implications for the design year, pre-impact turnovers of the centres examined for impact. In particular there is no assessment of population and convenience goods expenditure growth and how the base and design year expenditure flows are distributed between the various centres/stores prior to the opening of a new Lidl store. Tables 1 and 4 in Appendix EP3 assumes static growth in the convenience goods turnovers but it is not clear how these have been calculated taking into account per capita growth rates and changes in retail floorspace efficiency.

Base and design year turnover of existing centres

- 4.7 Table 1 at Appendix EP3 of the PRS sets out the convenience goods turnovers of only some of defined centres within the 10 minute catchment. While estimates are provided for Bowthorpe District Centre and The Larkman District Centre, all other centres are not, the table stating that there is no data available. This appears to be founded on the absence of information within the Town Centre and Retail Study Update (December 2020)⁵. We do not believe that this approach is robust. It is a matter for the Applicant to provide information on the likely trading effects and without an estimate of the anticipated turnover of the defined centres under a ‘no development’ scenario, it is difficult to predict and understand with any degree of clarity the anticipated effects.
- 4.8 Moreover Appendix EP6 of the PRS provides ‘health check assessments’ of various centres which in part can form a basis for estimating their anticipated turnover.
- 4.9 Finally any change in the predicted level of convenience goods expenditure within the catchment may affect their overall convenience goods turnover between the base (2023) and design (2028) years.

Turnover of the proposed development

- 4.10 Table 8.2 of the PRS sets out the proposed convenience and comparison goods turnover of the Lidl store. Based on a convenience goods sales area of 1,065 sq.m. to which a sales density of £8,444 sq.m. (2020 prices) is applied. For comparison goods a sales density of £4,548 sq.m. is applied to the net comparison goods sales area of 266 sq.m. The PRS and Table 2 at Appendix EP3 confirms that these have been supplied by Lidl in November 2023.
- 4.11 The letter from Emery Planning (April 2024) further confirms that Lidl has engaged with Global Data and Mintel in respect of their estimates of the company’s sales density on the basis that these are judged to be unrepresentative and ‘significantly in excess of that actual achieved, on average, by Lidl stores...’
- 4.12 While we acknowledge that sales densities will vary around a typical average, the absence of publicly accessible information to corroborate the design year turnover presents an issue in determining whether it is sufficiently robust when assessing impact. Therefore we recommend that the Applicant (on the basis that other assumptions are assumed to represent a worst-case) adopts a higher convenience goods sales density from published sources. This would ensure that a robust approach is adopted.
- 4.13 Finally we note that the PRS assumes that 60% of the convenience goods turnover of the former Lidl store at Drayton Road is reallocated to the new store. This equates to £5.1m. In which case this would suggest that the Lidl store prior to closure achieved a convenience goods turnover of £8.6m. This is in fact in excess of the £8.5m predicted for the new store on the application site which according to the Applicant meets all relevant operational and locational criteria. Yet the PRS at paragraph 2.3 states that ‘...this foodstore performed poorly...’

⁵ This is also referenced in the recently adopted Greater Norwich Local Plan (March 2024).
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Trade draw and assessment of impact

- 4.14 Table 4 at Appendix EP3 of the PRS sets out the trade draw. We have the following observations on this table:
- The trade draw from Bowthorpe District Centre at 1% seems to be unreasonably low given the proximity and accessibility of this centre to the proposed food store.
 - The assumption that 95% of the trade to the new store will be derived from the 10-minute catchment is considered reasonable.
 - Since the Aldi store at The Larkman District Centre is the closest comparable discount food retailer it seems unrealistic to assume a trade draw of only 10%. The letter from Emery Planning applies a sensitivity test assuming a greater proportion of trade is diverted from this store and concludes that there would be no significant adverse impact. The turnover of the Aldi store appears to be robust and we are aware that the company is seeking further investment in this store which would reinforce its ability to withstand a greater level of trade diversion.
 - A proportion of the convenience goods expenditure attributed to the former Lidl store at Drayton Road is reallocated to the new store (£5.1m⁶). This is on the basis that there is an overlap between the two catchments. In reality however the turnover attributed to the Drayton Road store will have been re-directed to existing centres/stores and should be included in the design year turnover of existing centres. However paragraph 2.3 of the PRS states in relation to the Drayton Road site that ‘...Lidl are actively seeking a replacement site for the Drayton Road store as this is considered to be a **distinctly different catchment...**’ (our emphasis). Consequently it is unclear why the assumption is being made that 60% of the convenience goods turnover of the Drayton Road store should be reallocated. The letter from Emery Planning (April 2024) states that the trade diversion from the former Lidl at Drayton Road is higher because it has closed. But as the letter also confirms the turnover from the former store will have been re-directed to other foodstores. But the calculation as to where the trade has been redistributed to in the design year is not evidenced although the principle that the trade will have been redistributed is agreed and provides some support for the conclusion that existing centres/stores could withstand higher levels of trade diversion.
 - None of the local centres are examined for impact. Yet these are confirmed to fall within the primary catchment area.
 - There is no assessment of comparison goods impact particularly upon Roy's store in Bowthorpe.

- 4.15 Without an updated impact assessment addressing these points it is not possible to accurately assess the potential trading effects. The Applicant is requested to follow the step by step approach as set out in the PPG using the updated/revised assumptions to provide a transparent and logical assessment of the predicted trade diversion in the design year.

Overall conclusions on retail impact

- 4.16 Having regard to our review of the PRS and Emery Planning's letter dated 2nd April 2024, we recommend that further information is required in order to provide an adequate basis for assessing the potential trading effects of the proposed development taking into account the requirements of Policy DM 18 and paragraph 94 of the NPPF. In particular:
- Updated forecasts of convenience goods expenditure within the PCA should be provided having regard to data within RPN 21 including SFT.

⁶ The letter from Emery Planning applies a sensitivity test assuming that 20% of the former Drayton Road store's turnover is diverted to the new store. However this does not include a revised/updated set of impact tables.

- Convenience goods turnover levels should be provided for all centres within Table 1 of Appendix EP3 including any revisions to the turnover of Bowthorpe and The Larkman District Centres. This should take into account the projected population and expenditure within the PCA together with the nature and scale of retail provision within these centres.
- A sensitivity test should be applied to the convenience and comparison goods turnover of the proposed Lidl food store using published data. In addition we would welcome comment from the Applicant regarding the turnover of the former Lidl store at Drayton Road relative to the design year store of the proposed store together with further justification for the turnover to be reallocated given the lack of overlap between the two catchment areas and the fact that the Lidl store close over 12 months ago. The ability of the new store to 'claw-back' trade as suggested is a key assumption which has the effect of significantly reducing the trade draw from other centres/stores.
- Further justification is required in respect of trade draw particularly from Roy's in Bowthorpe District Centre, together with the assumed reallocation of £5.1m⁷ from the former Lidl store at Drayton Road. Regard must be had to the fact that this trade will have already been diverted to other centres and the PRS suggests that it had a materially different catchment area.

4.17 Consequently we are unable to conclude that the requirements of Policy DM 18 and paragraph 94 of the NPPF are met.

⁷ Emery Planning do not believe allowing 20% of the former turnover to be redistributed is a realistic scenario.
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5.0 COMMENTS ON THIRD PARTY OBJECTIONS

1. Firstplan on behalf of Waitrose and Partners

- 5.1 The objection letter is dated 31st January 2024. Matters 2 and 3 address compliance with the sequential and impact tests.

Matter 2: Compliance with the sequential test

- 5.2 We agree that the Applicant has not discharged the onus within paragraph 011 (ID: 2b-011-20190722) of the PPG 'Town centres and retail'. In particular inadequate assessment has been made of the potential to accommodate a new food store as an extension to Bowthorpe District Centre taking into account the need to apply flexibility in terms of both scale and car parking. In addition the Applicant has not provided information to confirm whether other sites which are better connected to existing centres have been considered and discounted.

Matter 3: Compliance with the retail impact test

- 5.3 Whether the locally set threshold of 1,000 sq.m. GIA within Policy DM18 is up to date is a matter for the Council to consider. However Policy DM18 is part of the development plan and the Applicant has provided an assessment.
- 5.4 We agree that some of the technical inputs in the impact assessment should be updated as set out in Section 4 in order to enable informed conclusions to be reached. Having regard to the location of the Waitrose store within Eaton District Centre which lies outside the PCA we do not believe that this store will experience a significant level of trade diversion.

2. Avison Young on behalf of ALDI Stores Ltd

- 5.5 The objection letter is dated 4th March 2024. In relation to 'The Impact Test' set out in the letter we agree with the objector in relation to the lack of adequate information on the base and design year turnover of the identified centres. We do not believe that it would be proportionate in this particular case to request the Applicant to undertake a new telephone household survey of shopping patterns.
- 5.6 In addition we agree that updated convenience goods expenditure growth rates should be applied and have identified defences in the retail impact methodology.

6.0 OVERALL CONCLUSIONS

6.1 In relation to the matters upon which we have been asked to advise our main conclusions are as follows:

- The PRS undertakes a sequential assessment based on the sequential site parameters outlined in paragraph 7.17 of that document. The subsequent letter from Emery Planning (April 2024) states that flexibility has been applied to the proposed store size based on 1,750 sq.m. GIA. However the assessment of alternative sites particularly the potential availability and suitability of land within Bowthorpe District Centre appears predicated on a store size of 1,949 sq.m. with a demised 122 car parking spaces.
- Having regard to the sequential assessment whilst we agree that the majority of centres examined do not provide scope to accommodate a new food store of 1,750 sq.m. GIA either within or on their edge, we are unable to confirm that the test is passed in respect of Bowthorpe District Centre. In particular it has not been demonstrated that with flexibility applies particularly in relation to shared car parking provisions, that this centre does not provide an available and suitable site having regard to the judgment in *Aldergate Properties v Mansfield District Council* (2016) and paragraph 013 of the PPG 'Town centres and retail' (2014)
- Nor has the Applicant provided information on whether there are suitable and available sites which are better connected to existing centres as required by paragraph 92 of the NPPF (2023) and paragraph 011 of the PPG.
- In relation to the impact test, the use of information within the Greater Norwich Town Centres and Retail Study Update (2020) is considered appropriate as a starting point and we do not believe it would under the circumstances of the scale and nature of the proposed development, require the Applicant to undertake a telephone household survey.
- However key assumptions within the retail impact assessment need to be updated including the use of more recent forecasts of convenience goods expenditure per capita, special forms of trading and estimates of the turnover of existing centres under the 'no development' scenario. This should include re-assessing the implications associated with the closure of the Lidl store at Drayton Road in 2023 and the assumption that 60% of the turnover attributed to this store prior to its closure would be re-allocated to the proposed store in the application site. The PRS confirms that the Lidl store at Drayton Road was trading poorly yet appeared to have generated a convenience goods turnover prior to closure similar to that proposed at Barnard Road. The PRS also suggests that the catchment of the two stores is materially different.

6.2 Consequently based on the submitted information we are not able to conclude that the requirements of Policy DM 18 and national advice within the NPPF in respect of the sequential and impact tests, are currently met. However if the additional information is provided we would then be in a position to update our advice to the Council.