



**Former Charlton Kings Garage  
86 Cirencester Road,  
Charlton Kings**

**Retail Statement**  
On behalf of CTC (Gloucester) Limited

Ref: AH/DB/130081/R0001v3  
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## 1.0 Introduction

- 1.1 This Retail Statement is prepared by Mango Planning & Development Limited (“Mango”) on behalf of CTC (Gloucester) Limited (‘CTC’) in respect of two units comprising a 372 sq m (gross internal) Class A1 convenience store and two Class A3 units each measuring 46 sq m (gross internal) together with 16 car parking spaces at the site of the former Charlton Kings Garage, 86 Cirencester Road, Charlton Kings.
- 1.2 This Statement should be read in conjunction with the documentation submitted by Hunter Page Planning, the planning agents for the application.
- 1.3 It has been prepared in the context of the Joint Core Strategy Retail Study prepared by DPDS Limited in December 2011 (“The DPDS Study”).
- 1.4 This Statement will show that the redevelopment of the application site as proposed meets the requirements of national and relevant local planning policy in respect of the key retail policy tests of the sequential approach and retail impact.
- 1.5 Section 2 of this report describes the site and its planning history, whilst Section 3 provides a description of the application proposal. Section 4 reviews briefly the planning policy context of the proposal. Section 5 reviews the proposal against the sequential test. Section 6 assesses trading impact. Section 7 provides our summary and conclusions.

## 2.0 Site description and planning history

- 2.1 The application site is located on the western side of Cirencester Road, to the north of the junction where Cirencester Road, Newcourt Road and Bafford Lane converge.
- 2.2 It comprises of a former petrol filling station canopy, car sales showroom and forecourt, associated buildings (kiosk) and customer car park. The site is operated currently as a hand car wash and valet (on a short term lease). A copy of the site location plan is enclosed at **Appendix A**.
- 2.3 The site is bound to the north by open parkland. Cirencester Road provides the eastern boundary beyond which are semi-detached properties. To the south is Bafford Lane and to the west is Newcourt Road beyond which are further residential properties and a care home. The wider surrounding area includes the densely populated residential areas of Charlton Park to the north-west, Moor End to the south and west, Charlton Kings to the east and Little Herbert's to the south east. Cirencester Road provides a main arterial route through Charlton Kings and is well served by public transport.
- 2.4 The site lies approximately 90m to the north-west of Cirencester/Croft Road Neighbourhood Centre. Church Street Neighbourhood Centre is 600m to the east and Lyefield Road West Neighbourhood Centre is a 600m to the north-east.

### **Planning history**

- 2.5 The LPA records confirm that planning permission for a petrol filling station and service station was approved in 1965 (Ref: P/504/65), in addition there are further applications for minor works associated with this use. More recently, in 2009, retrospective planning permission was approved for the change of use of part of the site for the display and sale of motor vehicles (Ref: 09/00064/FUL).

### 3.0 Application proposal

- 3.1 The application proposes the demolition of the former petrol filling station canopy, kiosk, associated buildings/structures and the erection of a new 372 sq m (GIA) (280 sq m net) Class A1 convenience unit together with two Class A3 units each measuring 46 sq m (GIA) with associated car parking for 16 vehicles and servicing arrangements.
- 3.2 The form of the proposal is described more fully elsewhere in this application. The key characteristics from a retail planning perspective are however that the proposal will provide:
- A convenience store with a sales area of approximately 280 sq m, comprising predominantly convenience goods;
  - Two small Class A3 units;
  - 16 car parking spaces, including one disabled space; and
  - Servicing via an off street loading bay to the front forecourt.
- 3.3 No retailer is formally confirmed as the intended operator of the proposed convenience store. It has however been designed to meet the current requirements of the main convenience store multiple operators.
- 3.4 The proposed store will fall within the Institute of Grocery Distributors' definition of a 'convenience store' rather than a supermarket and as such will fulfil a dual function as a small convenience outlet primarily meeting the top up/basket shopping needs of local residents living within the surrounding walk-in catchment and providing for passing motorists.
- 3.5 A store of this size and character would typically offer a basic range of convenience goods such as groceries, sandwiches, snacks and confectionery. Non-food goods would comprise no more than 10% of the proposed floorspace and would typically be limited to toiletries, nappies and other 'essential' goods.

- 3.6 The proposed A3 units would be available to a wide range of potential occupiers for food and drink retail, such as coffee shops and restaurants.

### **Benefits of the proposal**

- 3.7 The Cirencester/Croft Road Neighbourhood Centre has very limited mainstream convenience goods shopping provision, comprising a Nisa mini-market store and speciality butcher (which in addition to selling direct to the public supplies local restaurants and offers a wholesale service). The Nisa unit appears to cater more for small basket and occasional purchases rather than providing a full top-up shopping outlet. As a consequence, while it trades well, it is in our view not fulfilling its intended role as a focus for local shopping and local people are making trips to stores further afield (particularly larger supermarkets) to meet their needs. This is an unsustainable pattern of shopping activity that is inconsistent with the general principles of planning policy.
- 3.8 The proposed anchor convenience store will bring day-to-day convenience shopping closer to consumers, reducing the need to travel, reliance on the car and encouraging walking and alternative modes of travel for day-to-day activities. In addition, the proposed A3 uses will encourage people to stay longer in the vicinity, encouraging linked trips to other local stores and facilities. This sustainable proposal would therefore support the role and function of the local centre and contribute to the reduction in carbon emissions and the fight against climate change. These considerations weigh heavily in favour of the proposal.
- 3.9 The provision of a quality convenience store operated by a main brand retailer will also increase range and choice and meet better the needs of local residents, particularly those who do not have access to the car and are unable to use public transport.
- 3.10 The proposal will also create new local employment. We anticipate that a store such as proposed will offer between 20 and 30 full and part time positions for local people. The proposed A3 units will also offer local full and part time employment opportunities.

## 4.0 Planning policy context

4.1 In this section of the report we consider the proposal against the requirements of national and local planning policy in respect of new retail development.

### National Planning Policy Framework

4.2 The National Planning Policy Framework (“NPPF”) was published in March 2012. It forms a key element of the Government’s plans to reform the planning system by making it less complex; more accessible; designed to protect the environment and to promote sustainable growth. The framework consolidates PPGs, PPSs and Circulars into a single planning document.

4.3 Paragraph 14 establishes the principle in favour of sustainable development and notes with particular regard to decision-taking that this means:

*“Approving development proposals that accord with the development plan without delay; and*

*Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*

- *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *Specific policies in this framework indicated in this framework indicate development should be restricted.”*

4.4 Paragraph 17 sets out a number of key principles that should underpin decision-making. These include the need to proactively support sustainable economic development.

4.5 Paragraph 19 makes clear that planning decisions should operate to encourage sustainable growth and that significant weight should be placed on the need to support economic growth in the planning system.

- 4.6 Paragraph 20 states that significant weight should be placed upon the need to support economic growth through the planning system.
- 4.7 Paragraph 24 states local planning authorities (LPAs) should apply a sequential test to planning applications for main town centre uses that are not in an existing centre.
- 4.8 Paragraph 26 states applications for retail outside of town centres should be accompanied by an impact assessment if the development is over a proportionate, locally set threshold, otherwise the default threshold is 2,500 sq m.
- 4.9 Paragraph 27 confirms that if an application satisfies the sequential test and is unlikely to have significant adverse impact it should be approved.
- 4.10 Paragraphs 186 and 187 state LPAs should approach decision taking in a positive way to foster the delivery of sustainable development and should look for solutions rather than problems. Decision-takers at every level should seek to approve applications for sustainable development wherever possible and LPAs should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.
- 4.11 This is reinforced by a statement by the Minister for Decentralisation in March 2011 entitled "Planning for Growth". This Statement sets out a strong presumption in favour of sustainable economic development. It acknowledges and supports the need to encourage investment and job creation in order to secure a swift return for economic growth. It makes it clear that local authorities should support development unless an application would undermine key policies in national guidance.
- 4.12 In particular, Planning for Growth confirms that local authorities should take the following actions in order to support the economy:
- Wherever possible, answer "yes" to development and growth except where this would compromise the key "sustainable development principles set out in



national policy”.

- Should support enterprise and facilitate economic and other forms of sustainable development.
- Consider the likely economic, environmental and social benefits and proposals, which include increasing consumer choice and promoting robust local economies.
- Ensure that they do not impose unnecessary burdens on development. Local authorities should give appropriate weight to the need to support economic recovery. If applications are consistent with policy set out in PPS4, and secure sustainable economic growth, they should be treated favourably.

### **The Development Plan**

- 4.13 The Development Plan to which the application falls to be assessed comprises the Cheltenham Borough Local Plan 2<sup>nd</sup> Review (adopted 2006) Saved Policies (2009). It should be recognised that weight to be afforded to “saved policies” is reduced as it is overtaken by new national policy.
- 4.14 The relevant retail policies are Policy RT1 and RT7. Policy RT1 directs retail development be assessed in accord with the sequential approach starting from the Core Shopping Area and ending in out of centre locations. Developers are encouraged to use flexibility and realism in format, design, scale and car parking. This policy accords with the sequential approach set out in the NPPF and therefore continues to carry material weight.
- 4.15 Policy RT7 indicates that retail development outside of defined shopping centres will only be permitted where a need for additional floorspace has been demonstrated and it will not impact upon the vitality and viability of defined centres. The need test was removed from national policy in 2009 and is not a test of the NPPF. As such, this policy can no longer be afforded any legitimate weight in the consideration of the application proposal.
- 4.16 In pre-application discussions the LPA has also raised Policy RT6 as of possible relevance to the application proposal. This policy states that:

*“Proposals for new local shopping centres will only be permitted in an area of identified deficiency”*

4.17 This policy is founded on the test of need, which as explained above, is no longer a test of national policy. Moreover, its tenor is inconsistent with presumption in favour of sustainable economic development set out in Para 14 of the NPPF and the sequential approach set out in that guidance. This policy cannot therefore be afforded any legitimate weight in the consideration of this proposal.

4.18 We would also note that Annex B to PPS4 (Now superseded, but still of relevance insofar as it reflected the definitions prevailing at the time that the Local Plan was drawn up) identifies that Local Centres:

*“include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre. Small parades of shops of purely neighbourhood significance are not regarded as centres for the purposes of this policy statement.” (Our emphasis)*

4.19 It is readily apparent from the above definition therefore that local centres offer a wide range of shops, goods and services and that small parades, such as proposed, demonstrably do not meet the accepted definition of a local centre. As such, even were Policy RT6 to be material, this proposal could not be considered to be in conflict with it.

4.20 In terms of the emerging plan, work is underway currently on The Cheltenham Plan and the Joint Core Strategy (“LDF”), which, are both at very early stages of progress. The NPPF at paragraph 216 acknowledges the more advanced the emerging plan the more weight that can be attributed to it. In this instance, the emerging plan is at a very early stage and therefore little weight can be attributed to it.

### **Conclusions on retail planning policy**

- 4.21 The proposal comprises the redevelopment of a brownfield site within an urban location, at the very edge of, and in close proximity to Cirencester Road Neighbourhood Centre.
  
- 4.22 As a proposal that is in an edge-of-centre location there is a requirement to demonstrate compliance with the sequential test.
  
- 4.23 In terms of impact, the proposal falls well below the threshold for an impact assessment ordinarily required by the NPPF. Absent of a locally set threshold an impact assessment is not required in this instance.

## 5.0 Sequential assessment

- 5.1 The application site is about 90 metres level walk from the existing local centre and therefore falls well within the definition of an ‘edge of centre’ site set out in the PPS4 Practice Guidance, which refers to distances of up to 300 metres.
- 5.2 As such, it is a requirement of national guidance that applicants demonstrate that there are no alternative sites in more central locations (i.e. within defined centres) that are suitable, available and available to accommodate the proposal.

### Application of the test

- 5.3 The need for realism in the application of the sequential test is supported by recent case law. In the Supreme Court judgment in respect of Tesco Stores Limited v Dundee City Council [2012], it was held that in defining the term “suitable” reference should be made to the design of the developer’s proposal subject to the demonstration of flexibility and realism. It was held that the issue of suitability must be directed at the developer’s proposals and not to some alternative scheme, which might be suggested by the LPA.
- 5.4 This ruling has been supported further by the High Court in respect of Zurich Assurance Limited v North Lincolnshire Council [2012], where the Tesco v Dundee judgment was reiterated. As Lord Reed said in Tesco v Dundee, at (29):

*“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”.*

- 5.5 In application of the sequential test, therefore, it is clear that provided the applicant has shown a reasonable degree of flexibility, the approach of the LPA must be guided by pragmatism and realism.

## **Flexibility**

- 5.6 While it would be unrealistic to consider the disaggregation of the retail offer within the convenience store itself, it is reasonable to consider whether it, and the two A3 units proposed, may be sited at alternative premises or sites in sequentially preferred locations that continue to meet the identified commercial requirements.
- 5.7 Looking firstly at the convenience store element, we are advised by interested retail parties that the following parameters are the key criteria for any new convenience retail unit:
- A unit of no less than 250 to 280 sq m net;
  - A demised customer car park of an appropriate size directly adjacent to the retail unit to allow the safe and direct transfer of goods from store to customer vehicle; and
  - Simple, safe and efficient servicing arrangements allowing HGVs to arrive, unload and leave the site without any disruption, conflict with the wider highway network or any negative impact on residential amenity.
- 5.8 Against this background we have sought to identify new sites or stores in Cirencester/Croft Road Neighbourhood Centre capable of accommodating a 250 to 280 sq m surface level sales floor with appropriate servicing and surface level car parking.
- 5.9 While we have considered whether a smaller store would meet the identified need, we are advised that the proposal represents the minimum operational requirements of the target retailers. As such, a smaller basis of assessment would serve no practical purpose.
- 5.10 A store below this minimum unit threshold would simply be unable to stock the core product range, resulting in an unacceptably compromised retail offer. It is this minimum unit size that underpins the consideration of alternative possible sequentially preferable sites.

- 5.11 Within this absolute parameter of suitability, the target operator's are flexible as to whether its floorspace requirement is provided through the re-occupation of an existing unit or the redevelopment of an existing site. In both scenarios an operationally acceptable form of development would need to be achieved.
- 5.12 In terms of the A3 units, the commercial requirements are less onerous. Any alternative units would need to be a minimum of 46 sq m and offer road frontage with appropriate off road parking.

### **Search area**

- 5.13 The proposal is intended to serve a localised catchment in this area of Charlton Kings, extending to no more than a 500m walk from the application site. Church Street and Lyefield Road West Neighbourhood Centres are in excess of 600m walking distance and, as such, serve an entirely different catchment. In practical terms therefore, the only centre that ought reasonably to be assessed against the sequential test is Cirencester/Croft Road.
- 5.14 This is a reasonable approach that reflects the views of the Inspector in respect of the appeal decision for a similarly sized store at Bear Flats in Bath (Ref 2124252) (**Appendix B**). Paragraph 18 of that decision notes:

*"At the Inquiry the Council explained that it considered the sequential analysis undertaken for the appellant company to be inadequate as it did not refer to any other local centre or the City Centre. There would be some overlap between the PCA of the proposed store and centres other than Bear Flat. In particular there would be considerable overlap between the PCA of the proposed development and the catchment area of the Moorland Park local shopping centre (which is also known as Moorland Road). The availability of units within Moorland Park and other centres has not been fully assessed. However, Bear Flat is the only centre within easy walking distance of Poets Corner and Bloomfield. Additional convenience good retail space in other centres, including Moorland Park and the proposed store at Odd Down, would be inconvenient for residents of those areas, particularly for daily and top up shopping. Additional convenience retail space within those centres would therefore not promote more sustainable patterns of travel for a substantial proportion of the population of the PCA. For these reasons I consider that it would be inappropriate to give preference to other main or local centres."*

### **Site assessment**

- 5.15 In the context of the above, we have considered the potential of any vacant units and sites at the Cirencester/Croft Road local centre to accommodate the minimum requirements above
- 5.16 Our assessment, undertaken on 2<sup>nd</sup> October 2013, of Cirencester/Croft Road identified only four units, all of which were occupied. Moreover, our assessment confirmed that even undertaking a flexible assessment of the centre, unsurprisingly, given the scale of the centre, identified no sites that are suitable, available and viable alternatives to the application site. For completeness, Church Street and Lyefield Road West were also assessed and no vacant units or sites were identified. It is our view therefore that the application proposal satisfies the requirements of the sequential test.

### **Conclusion on the sequential test**

- 5.17 The application site falls in an edge of centre location and as such it is incumbent on the applicant to demonstrate that there are no in-centre locations that are suitable, available and viable to accommodate the proposal. In undertaking and interpreting the sequential test, guidance and case law encourages a realistic and flexible approach that reflects factors such as the intended catchment of the proposal and commercial needs.
- 5.18 In this context we have undertaken a sequential assessment and identified no in-centre sites or premises that could accommodate this proposal, either as a whole or in its constituent parts. As such, it has been shown that the proposal is compliant with the sequential test to site selection.

## 6.0 Trading Impact

- 6.1 As a proposal well below the NPPF threshold of 2,500 sq m gross, planning policy does not require that impact be addressed by way of a detailed assessment unless there are lower thresholds set in an adopted Local Plan.
- 6.2 This point has been confirmed in an appeal in respect of a Co-op store in Coggeshall, Essex (Appeal ref. 2171723) (**Appendix C**) where, absent of a lower threshold than the 2,500 sq m in national guidance the Inspector concluded that a retail impact assessment for the 760 sq m store proposed in that case was not required.
- 6.3 The proposed convenience store is, at 372 sq m gross, well under the threshold set in the NPPF and only just over half the size of the store considered at the Coggeshall appeal. The proposed A3 units are, of course, significantly smaller still.
- 6.4 Notwithstanding this position, to assist officers' understanding of the proposal, we have undertaken a brief assessment of impact of the convenience store element of the scheme.
- 6.5 Insofar as the only defined centres in the vicinity of the application site are Cirencester/Croft Road, Church Street and Lyefield Road West Neighbourhood Centres, these are the focus of our impact assessment. Only Cirencester/Croft Road falls within the 500 metre walking catchment.
- 6.6 In the following paragraphs we consider the trading characteristics of the proposal to give an understanding of its direct effects on Charlton Kings.

### **Existing provision**

- 6.7 Cirencester/Croft Road comprises a total of four units, of which, only two are in convenience use. These are a Nisa mini-market and a speciality butcher.



- 6.8 The butcher has a speciality offering that is very different to the mainstream pre-packaged offer that is proposed. As noted in the Barbourne Road appeal decision in Worcester (Appeal Ref. 2080539) (**Appendix D** - Para 22), such stores offer a “niche service” that is not in direct competition with mainstream convenience stores.
- 6.9 The Nisa is a small convenience unit that has recently been internally altered to turn storage space into sales area. As such, the VOA recorded sales area of 91 sq m underestimates the sales area in our view by about 40 sq m. Notwithstanding this change in sales space, the store continues to have a relatively limited offer, particularly in terms of fresh fruit and vegetables, fresh meat and other perishable goods. The new arrangements have also resulted in significant storage of produce within the sales area, reducing the overall quality of the shopping experience.
- 6.10 While this outlet fulfils an important role and function, it does not provide the range and choice of goods required to provide a genuine alternative for top-up shopping to the larger supermarkets further afield. This is evidenced within the household survey data contained within the DPDS study, which does not record any responses identifying this store as a principal top up location.
- 6.11 Approximately 600m to the east of the application site is Church Street Neighbourhood Centre, which serves a different catchment. The centre comprises nine units in total of which, the convenience provision comprises a Co-op (270 sq m net) and Forge News (30 sq m net).
- 6.12 To the north-east is Lyefield Road West Neighbourhood Centre approximately 600m from the application site, which again serves a different catchment. The centre comprises four units in total, of which two are convenience stores. These comprise Budgens (118 sq m net) and The Flower Room, a speciality florist (20 sq m).

#### **Proposed store**

- 6.13 There is no operator associated with the store at present, but it is anticipated that it will be occupied by one of the national retailers such as Waitrose, M&S, Tesco, Co-

op, Morrisons or Sainsbury's.

6.14 As outlined above, existing local top up provision in this area is limited and the majority of locally generated top up spending is directed to larger stores further afield. Accordingly, we consider that the proposed convenience store's trade draw will be orientated towards those mainstream food stores and larger top up stores operating beyond the local area.

6.15 Furthermore, some "distress" top-up purchases at the store will include goods which otherwise would normally be purchased as part of a main food shop beyond the local area. The location of the application site on the main road through Charlton Kings will ensure that it is well placed to intercept shopping trips currently being made to stores further afield.

#### **Proposed Turnover**

6.16 In order to quantify any potential impact of the application proposal, it is first necessary to estimate the likely turnover that the proposed retail unit would expect to achieve.

6.17 For the purposes of this assessment we have adopted a figure of £4,500 per square metre. This sales density is a representative average of that achieved by a mix of the kind of national multiple and franchise operators likely to be drawn to an outlet of this nature in this location.

6.18 This means that the total turnover of the proposed retail floorspace (280 sq m net) will be circa £1.26 million in 2013. On the basis that convenience goods will account for 90% of total net sales area, this equates to a convenience turnover of £1.13 million.

6.19 As a sensitivity test, and reflecting previous discussions with the LPA's retail consultants DPDS in respect of a similar proposal elsewhere, we have also considered the turnover at a higher sales density of £6,000 per sq m, which may be

considered a 'worst case' scenario. This would equate to a convenience goods turnover of £1.51 million.

- 6.20 The level of comparison goods diversion is so limited as not to justify detailed assessment.

### **Trade draw**

- 6.21 In the absence of the provision of larger supermarkets within Charlton Kings and being located on a busy arterial road, we consider that trade drawn from Morrison's at Up Hatherley, Sainsbury's at Priors Road, Waitrose at Honeybourne Way and other supermarkets further afield will account for about 80% of the proposed store's turnover.
- 6.22 The household survey within the DPDS report confirms that none of the convenience stores within the adjoining Neighbourhood Centre were individually identified as providing a top-up shopping role.
- 6.23 We estimate that the remaining 20%, or £0.23 million, will be drawn from smaller, top-up orientated stores in the locality and along the Cirencester Road. Up to one third of this diversion, amounting to about £75,000, will be diverted from the Nisa store to the south of the application site. At the 'worst case' sensitivity test levels identified above, this would increase to just over £100,000.
- 6.24 This store appears to be trading at levels above average for this kind of outlet and is estimated to have a turnover at present of about £650,000 - £750,000 per annum. The proposed store would therefore generate an impact of approximately 10-12% on that store at the forecast levels, and between 13-15% at the 'worst case' sensitivity test levels. Given the trading performance of the store, this is not likely to materially undermine its future trading and cannot therefore be considered a 'significantly adverse' impact when assessed against the tests of the NPPF.
- 6.25 Other stores, including Co-op, Budgens and other local stores will experience lower

impacts with consequently lower levels of diversion.

6.26 We would note of course that the impact figures given above need to be considered in light of a number of factors.

6.27 Firstly, these represent only a sectoral impact on convenience goods outlets. Planning policy is concerned with impacts on centres as a whole. In reality, shoppers who switch to the proposed store will still visit the identified centres for services and goods, which would not be available at the store. Anyone needing to use the Post Office (Lyefield Road West), visit a pharmacy, hair salon, coffee shop and takeaway would continue to do so regardless of the proposed store.

6.28 Secondly, the figures above make no allowance for 'linked trips' arising from the clawback of expenditure. Some 80% of trade to the new store will be clawed back from outlets beyond Charlton Kings itself. The new store, in an edge of centre location, is well placed to generate linked trips from those new customers to other facilities, including the local butcher.

#### **Conclusions on retail impact**

6.29 Our assessment above has shown that, considered on its own, the proposal will result in only a moderately adverse impact on the existing Nisa store and no material impact on other stores and centres. When considered against the effect on the centres as a whole and taking account of spin off trade generated by the new store, the proposal will not have a significant adverse impact on the vitality and viability of any of the centres identified.

## 7.0 Conclusions

7.1 This Statement has considered the application proposal against the relevant tests of national and local planning policy. It has concluded that the proposal will deliver a number of benefits to the local area and will meet both national and local planning policy objectives, including:

- Supporting Charlton Kings in increasing local range and choice and encouraging sustainable transport choices; and
- Creating new local employment.

7.2 These benefits will be achieved in compliance with the requirements of the sequential test, and without significant adverse impact on existing defined centres.

7.3 In summary, we contend that the application proposal is fully compliant with key national and local planning policy objectives in respect of investment and will result in economic and sustainability benefits to the local area. Accordingly, the application should be supported and planning permission granted.