
January 2015

NPPF Sequential Assessment

**Aldham Bridge Services Site,
Wombwell Lane
Wombwell**

**Proposed Development
Construction of New Retail Unit
And
Refurbishment of Existing
Retail Units
(Use Class A1)**

On behalf of

Riseholm Investment Limited

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APPENDICES

Appendix 1: Lawful Development Certificate (2010/1457) for Application Site

1.0 Introduction

- 1.1 This NPPF Sequential Assessment has been prepared on behalf of Riseholm Investment Ltd at the request of Barnsley MBC to support an application seeking planning permission for a phased development on land at Barnsley Road in Wombwell comprising construction of a new retail unit, removal of existing former petrol filling station canopy, access and associated car parking as part of phase 1 and refurbishment of existing buildings in retail use (Use Class A1) forming phase 2.
- 1.2 The proposal includes provision of an additional 743 m² gross retail unit towards the Barnsley Road site frontage, along with associated car parking for the unit which will also serve the existing units, landscaping, access and removal of the former petrol filling station canopy as phase 1 of the development. The retail unit is to be operated by Farmfoods.
- 1.3 Phase 2 will comprise the refurbishment of the existing retail units towards the rear of the site, which provide around 1,115 m² gross retail floorspace which reflects the quantum of retail established by a lawful development certificate in February 2011.
- 1.4 This Report addresses retail policy considerations whilst the submitted Planning Statement deals with broader planning issues.
- 1.5 In relation to retail policy and given the scale of the proposed development, particularly when viewed against the planning history of the site, it has been agreed with officers that relevant matters to address only include the sequential approach.
- 1.6 Against this background the report proceeds as follows:
 - Section 2.0 briefly describes the application site and relevant planning history;
 - Section 3.0 provides an overview of the redevelopment proposals;
 - Section 4.0 summarises relevant planning policy;
 - Section 5.0 deals with key retail policy considerations including the sequential test; and
 - Section 6.0 sets out our conclusions.

2.0 Site Description & Planning History

Site Description

- 2.1 The site lies on Barnsley Road in the northern part of Wombwell. Existing development on Barnsley Road to the north west includes residential uses whilst to the south east are more employment related uses with further residential areas as you enter the main urban area of Wombwell.
- 2.2 The site is bound to the west by Old Farm Lane. To the north the site boundary is marked by a line of existing trees beyond which is an embankment, on top of which is the line of the former railway line. The latter now forms part of a multi-user recreational route. The old railway line crosses over Old Farm Lane. To the south east of the site is a further treed area. Opposite the site is an ATS Euromaster tyre change depot.
- 2.3 Although the site is located in Green Belt it is close to existing development including both residential and employment uses. Bus stops are located proximate to the site serving both east and west directions. The site is therefore accessible by a choice of transport mode.
- 2.4 The site itself is unattractive in appearance and currently comprises a line of units towards the rear of the site with a former petrol filling station canopy extending forward to Barnsley Road from the western unit. The latter was occupied by Wombwell Pet and Aquatics.
- 2.5 The middle unit is currently occupied by a bedroom furniture retailer (Bedworld). At the eastern end is a further vacant unit with front shutter doors closed.
- 2.6 On the eastern part of the site is a hand car wash. The south east corner of the site has a number of trees with an existing hard surfaced road passing through the trees in a loop. Some of these trees are the subject of a Tree Preservation Order (TPO).
- 2.7 The site is run down in appearance and includes a relatively large area of vacant floorspace, along with one occupied unit. The existing development does not offer modern good quality retail accommodation. It is in need of regeneration and the existing canopy is old, tired and in need of removal. Overall, the quality of the physical environment of the site is low and of poor quality.

Planning History

- 2.8 The planning history of the site on the Council's public access system includes a number of planning applications.
- 2.9 A key relevant aspect of the planning history in the context of this assessment was the grant of a Certificate of Lawfulness of Existing Use (CLEUD) (2010/1457) in February 2011 for the two units at the rear of the site with Class A1 retail use being the established lawful use of the premises.

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- 2.10 The LDC states that sufficient evidence had been provided to demonstrate that the A1 Retail Use of the two units and associated parking had occurred continuously for a period of more than 10 years.
- 2.11 On this basis and having regard to those units identified in the LDC as benefitting from a lawful retail use (Class A1), the site is currently occupied by 1,115 m² gross of retail floorspace (see **Appendix 1**).

3.0 Proposed Development

- 3.1 The proposed development would entail two phases. Phase 1 comprises construction of the proposed Farmfoods 743 m² gross unit (Class A1) towards the Barnsley Road site frontage, removal of the petrol filling station canopy, construction of car park with appropriate site levels to comply with flood mitigation and landscaping. The car park would serve the new Farmfood unit and the existing units towards the rear of the site.
- 3.2 Phase 2 comprises refurbishment of the existing parade of retail units measuring around 1,115 m² gross floorspace. The proposed site layout (Plan: 3R11-0-100/Rev E) plan shows the location of the Farmfoods unit and existing retail units towards the rear of the site with servicing.
- 3.3 The unit proposed on the south east corner measures 743 m² gross and would be operated by Farmfoods, a frozen food specialist. The nearest Farmfoods representation is currently around 4.5 miles to the east in Mexborough or just over 5 miles to the south at Parkgate in Rotherham. There are no local stores in Barnsley/Wombwell.
- 3.4 Farmfoods is a frozen food retailer with an even more value focused positioning than its main competitor, Iceland. Following a period of decline around 2007/2008, when sales fell by around 8% (in 2007), like many quality value retailers the recession has provided a boost to sales enabling the company to invest in new stores.
- 3.5 The units towards the rear of the site would be occupied by other retailers although none have been specifically identified at this stage. The existing retail floorspace confirmed through the lawful development certificate could be occupied by a range of retailers as it benefits from an open A1 retail use.
- 3.6 The proposed investment in new economic development on the application site seeks to provide a suitable unit for Farmfoods and one of sufficient size to enable it to retail its range of frozen goods for those requiring a more value orientated offer.
- 3.7 The site layout plan shows the main customer car park in the southern part of the site fronting Barnsley Road. Servicing would be to the east and west of the rear units and on the northern side of the proposed Farmfoods unit.
- 3.8 Access to the site would utilise the existing eastern vehicular access with the other existing access closed off. Soft landscaping would be provided on the edge of the site, particular towards the site frontage.
- 3.9 Overall, the proposed development would remove existing unsightly buildings and replace them with modern well designed units with the new Farmfoods unit facing west into the main car park. The southern elevation of the Farmfoods building would face Barnsley Road and appropriate treatment provided.
- 3.10 The proposal provides an opportunity to improve a run down and unattractive site in need of regeneration. The current quality of the built environment with the hand car wash is poor and the proposed provision of a modern retail unit,

along with a further phase of refurbishment of the existing retail units towards the rear of the site, will provide an important visual benefit on the main connecting road between Barnsley to the west and Wombwell to the east.

4.0 Planning Policy

The Development Plan

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that if regard is to be had to the Development Plan for the purposes of a determination to be made under the Planning Act, determination is to be made in accordance with the Plan unless material considerations indicate otherwise. The Development Plan for Barnsley comprises the following:-
- The Barnsley Core Strategy (September 2011)
 - Barnsley Unitary Development Plan (UDP) (December 2000)
- 4.2 Emerging development plan policy will be provided by a new Local Plan which will incorporate changes to the Core Strategy and proposed policies and allocations. The Barnsley Local Plan Consultation Draft was issued for consultation recently with representations due by 11th January 2015. ID Planning submitted representations on behalf of the applicant. Given the early stage reached in preparation of the Local Plan, no weight can be attached to emerging policy at this stage.
- 4.3 In dealing with retail policy considerations a key material consideration is the **National Planning Policy Framework** ("NPPF"), which was published in March 2012 and replaces virtually all previous national guidance.

Barnsley Unitary Development Plan (UDP) (2000)

- 4.4 Barnsley UDP was adopted in 2000 with some policies subsequently saved in 2007. Whilst the adopted Core Strategy replaced a number of UDP policies the local plan allocations remain in place until the new Local Plan has been adopted.
- 4.5 The UDP defines the boundaries of existing centres through the definition of Principal Shopping Centres (**Policy WW19**) with Fringe Commercial Areas (**Policy WW20**) also defined. The Policy WW20 designation offers scope to accommodate a wider range of uses than in principal shopping areas.
- 4.6 The nearest centre defined in the UDP and agreed with Officers for the purpose of the application of the sequential approach is Wombwell town centre (defined as a District Centre in the Core Strategy). In retail policy terms the site is located out of centre.
- 4.7 **Policy S1** directs new retail development to locations within the central shopping area of Barnsley town centre and other centres.
- 4.8 **Policy S3** deals with retail proposals outside the central shopping area of existing centres and permits such developments:
- a) On sites allocated for that purpose in the plan;
 - b) Where there is no suitable site available within a defined centre, or where there is no available allocated site, then on a site at the edge of a defined shopping centre so long as it can provide a satisfactory functional connection thereto in terms of distance and physical

relationship and where it is likely that development of the site will generate joint trips to it and the adjacent centre, subject to the provisions of Policy S4 (no longer saved), or

- c) Where there is no suitable site available either within any of the centres defined above or in accordance with the requirements of (a) or (b), then an out of centre site in a location accessible by a choice of means of transport.

Barnsley Core Strategy

- 4.9 The Barnsley Core Strategy was adopted in September 2011. There are a number of retail related policies within the document which are relevant to the proposed development and these are set out below.
- 4.10 Wombwell is defined as a District Centre under **Policy CS31** of the Core Strategy. **Policy CSP31** supports maintenance and enhancement of the vitality and viability of district centres. Development generally is expected to meet the needs of the local area. A sequential approach will be used to assess proposals for new retail and town centre development with edge of centre or out of centre proposals only allowed where it meets the requirements of PPS4. The latter has been replaced by the NPPF.
- 4.11 **Policy CSP32** deals with 'Small Shops' and is permissive of convenience shops that meet daily shopping needs of a local community if this need is not already met and the shops are located and designed to encourage trips by pedestrians and cyclists and would not encourage car trips. Small shops are 500 m² gross or less.

Material Considerations

National Planning Policy Framework

- 4.12 The National Planning Policy Framework ("NPPF") was published in March 2012 and replaces virtually all previous national guidance. The introduction to the document confirms it is a material consideration in the determination of planning applications.
- 4.13 The policies in the NPPF, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system (paragraph 6). At the heart of the NPPF is a 'presumption in favour of sustainable development' (paragraph 14).
- 4.14 In relation to retail policy considerations and in delivering sustainable development, the NPPF seeks to ensure the vitality of town centres. Paragraph 24 indicates that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.
- 4.15 Impact assessments are required for retail development outside town centres which are not in accordance with an up to date Local Plan and over a threshold of 2,500 m² unless there is a locally set threshold. In this instance there is no local threshold set out in local planning policy.

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- 4.16 The existing retail floorspace identified under the lawful development certificate amounts to 1,115 m² gross with the proposed additional Farmfoods unit on the site measuring 743 m² gross. The proposed development sits well below the threshold. It has therefore been agreed with officers that a formal impact assessment is not required.
- 4.17 The NPPF makes clear (paragraph 19) that the planning system should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight is to be placed on the need to support economic growth through the planning system.
- 4.18 The NPPG sets out a checklist of considerations that should be taken into account when determining whether a proposal complies with the sequential test. This includes the following matters:
- With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the 'proposal' been considered?
 - Is there scope for flexibility in the format and/or scale of the proposal?
 - It is not necessary to demonstrate that a potential town centre / edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
 - If there are no suitable sequentially preferable locations, the sequential test is passed.

5.0 Retail Policy Considerations

- 5.1 The "NPPF" was published in March 2012 and replaces virtually all previous national guidance. The associated guidance (NPPG) was issued in March 2014.

Sequential Approach

- 5.2 Paragraph 24 of the NPPF confirms a sequential assessment will be required for applications for main town centre uses which are not in an existing centre or in accordance with an up to date development plan.
- 5.3 The purpose of the sequential approach as set out in guidance is to ensure all in centre options have been thoroughly assessed before less central sites are considered and for it to be demonstrated that there are no town centre sites to accommodate a proposed development, followed by edge of centre sites before looking at an out of centre location.
- 5.4 When assessing edge of centre and out of centre sites the NPPF indicates a preference for sites that are well connected to an existing centre.
- 5.5 The application site lies to the west of Wombwell, with the district centre well in excess of 300 metres from the application site. The site is therefore in an 'out of centre' location for the purposes of applying the sequential approach.
- 5.6 The NPPF offers little guidance on exactly how the sequential approach should be applied in practice with some guidance offered by the NPPG. It states (paragraph 24) that when considering potential sequential sites applicants and local planning authorities should demonstrate flexibility in terms of scale and format.
- 5.7 Limited assistance in applying the sequential approach is provided by the recent online National Planning Practice Guidance (NPPG).
- 5.8 The proposal would provide a total of 1,858 m² gross retail floorspace, including the existing established retail units on the site measuring 1,115 m² gross. These units comprise the existing retail floorspace which has been confirmed by the grant of the lawful development certificate. The additional unit for Farmfoods (743 m² gross) is located towards the front of the site.
- 5.9 Under the NPPF sequentially preferable sites are to be 'suitable' and 'available'. The question of what 'suitability' means in practice has been clarified through case law by the judgement of the Supreme Court in *Tesco Stores Limited (Appellants) v Dundee City Council (Respondents)* 21 March 2012.
- 5.10 The judgement clarifies (paragraph 29) that the question of suitability in the sequential test concerns "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".

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- 5.11 There does, however, remain a requirement on both the developer and decision maker to retain a degree of flexibility albeit as Lord Hope put it in the Dundee judgement, the need for flexibility in format and scale are criteria designed for use in the real world in which developers wish to operate and not some artificial world in which they have no interest in doing so.
- 5.12 In applying the sequential approach in the context of the need for flexibility, the NPPF indicates that applicants and local planning authorities should demonstrate flexibility on issues such as format and scale (paragraph 24).
- 5.13 This implies that as much as applicants are to demonstrate flexibility, local planning authorities are also to be flexible. This indicates that consideration should be given to the proposed business model when applying the sequential approach. This is highlighted by the comments of Lord Hope in the Dundee judgement.
- 5.14 In this case the proposed development seeks to regenerate a run down and unattractive site in the Green Belt which benefits from a lawful development certificate confirming a quantum of retail floorspace in this location (1,115 m² gross). The Farmfoods unit represents additional retail floorspace on the site.
- 5.15 In considering how to apply the sequential approach in this instance, we consider it reasonable to conclude that on the basis of the planning history of the site, the location of 1,115 m² gross retail floorspace on the site is reasonable and acceptable. It represents the quantum of space confirmed by the lawful development certificate.
- 5.16 The rationale for the proposed development arises from the desire to enhance an existing unattractive site in need of investment and regeneration. *The existence of that retail floorspace is the reason for the development coming forward.* The proposal is therefore location specific.
- 5.17 Having regard to the need for flexibility it would be reasonable in our view to conclude that the application site is an appropriate location for the majority of the floorspace in the development given the existing retail units on the site which have been confirmed as Class A1 retail in the context of the permitted lawful development certificate.
- 5.18 In applying the sequential approach we have therefore focussed on whether there is a suitable and available site in or on the edge of Wombwell District Centre which could accommodate the proposed Farmfoods unit. Early discussions with the Council's policy officer confirmed this was the only relevant centre in which the search for any sequentially preferable sites should be carried out.
- 5.19 Therefore if there are no suitable or available sites in or on the edge of Wombwell District Centre which could accommodate Farmfoods, there would not be a suitable or available site to accommodate the proposed building which would be occupied by the two units on the rear part of the site.
- 5.20 When considering potential sites we have had regard to the scale of the Farmfoods unit and the need for car parking to be provided to serve the unit. Whilst we do not consider the need for flexibility in the context of the Dundee judgement requires us to consider whether existing vacant units in the centre
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could accommodate the proposed development, unless they have car parking to serve the unit, we have nonetheless examined existing vacant units to see if they could be considered suitable.

- 5.21 Wombwell District Centre is defined on the adopted Local Plan Proposals Map. The main focus of centre and where the greatest concentration of shops are located is on the High Street. This area is identified in the local plan as the 'Principal Shopping Centre'. High Street runs east/west through the centre with units to the south of the High Street set at the back of the pavement and largely comprising smaller more traditional units.
- 5.22 On the northern side of the High Street is a parade of shop units with varying sizes reflecting a development typical of the 1970's. The units are set back from the High Street giving a relatively wide area for pedestrian circulation and at certain times of the week for outdoor market stalls. This wider parade extends the full length of the principal shopping centre on the High Street.
- 5.23 Main retailers/occupiers in this part of the centre include a Wilkinsons store, post office, Tesco Express, Heron Frozen Foods, Fulton Frozen Foods, Yorkshire Bank/Barclays Bank, Card Factory, BetFred/William Hill, Poundstretcher, Greggs/Stanimorths bakers along with a range of independent retailers including butchers, bakers and a greengrocer stall. The principal shopping area includes other uses such as the Weatherspoons public house and retail services such as opticians, building societies, hairdressers, cafes, restaurants, takeaways and travel agents.
- 5.24 The identified Fringe Commercial Area is focussed to the east of the principal shopping area around George Street/Market Place/Church Street/Park Street and Station Road. These streets still include a good proportion of retail representation but with a more service orientated offer along with other uses. This area includes Wombwell Library, a Sports Social Club, a place of Worship, a Health Centre and various restaurants and bars/public houses.
- 5.25 Existing District Centre car parks are free with the main car park being located to the rear of existing properties to the south of the centre. The Summer Lane car park has capacity for around 180 vehicles and is the largest car park serving the centre.
- 5.26 Other car parks are located on the fringe of the centre and include car parks off Park Street (30 spaces), Market Place (59 spaces), Cemetery Road (21 spaces) and two small car parks off Snowden Terraces (64 and 20 respectively) to the rear of the main parade of shops north of High Street. The car parks clearly serve both those working in the centre (providing free parking) and those visiting the centre for shopping or other activities. All car parks were well used when visited with the Summer Lane car park and the car park off Park Street being particularly popular.
- 5.27 In terms of possible development sites and in looking at potential for expansion of the centre, overall the district centre is hemmed in by existing development including existing residential areas and other uses such as the main Police Station to the east. Consequently, there is no room for expansion.

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- 5.28 To the north east of the centre are existing residential uses, beyond which is the main road (A633). This runs east/west providing a link between the Dearne Valley Parkway (A6195) and the Barnsley area. South of the centre are existing residential areas whilst west are further residential areas and further out towards the application site are existing employment areas.
- 5.29 Consequently and from our on site assessment of Wombwell and its commercial fringes areas, there are no suitable development sites which are available and which could accommodate a reasonable scale of development. More particularly, there are no sites which could accommodate something approaching the proposed Farmfoods unit and associated car parking.
- 5.30 With regard to whether any vacant units could represent a suitable and available site, we do not consider in the context of the Dundee judgement that a vacant unit in the main shopping area could be said to provide a 'suitable' site for the proposed development even having regard to the need for flexibility. Having reviewed the district centre there are no vacant units with associated car parking which could accommodate the Farmfoods unit.
- 5.31 There are some vacant units in the principal and fringe areas of the District Centre but none would be suitable. In this context all are too small. The largest three vacant units in the centre include the former Quicksilver Amusements Centre on the High Street, the vacant unit opposite (23 High Street) and the former Blockbuster unit at 3-5 Station Road.
- 5.32 Using data from the Valuation Office website, these three units vary in size from a maximum of 245 m² gross (Blockbuster Unit) to 200 m² gross (Quicksilver Unit). There is no data for the other vacant unit but on the GOAD Plan it appears of similar size to the former Quicksilver unit. Other vacant units in the centre are considerably smaller than those identified above and reflect more traditional High Street units. None provide surface level adjoining car parking.
- 5.33 The Dundee judgement highlighted that although the sequential approach is applied having regard to the need for flexibility, developers operate in the real world and not some artificial world. Having regard to the above none of the vacant units in the centre, including those in the principal shopping area and more commercial fringe areas, are suitable for the proposed development. All the vacant units are clearly too small to accommodate Farmfoods (743 m² gross).
- 5.34 As the existing units on the site are to be retained and refurbished as a later phase of investment, it is not necessary to search for any alternative sites to accommodate this element. However, even if this was the case there are no suitable and available sites to accommodate a 1,115 m² gross building with associated parking provision.
- 5.35 Having applied the sequential approach to assess whether there are any suitable or available sequentially preferable sites to the out of centre application site, we conclude there are no in centre or edge of centre opportunities which warrant further investigation.

Impact Considerations

- 5.36 At 743 m² gross, the proposed Farmfoods unit falls well below the NPPF threshold at which a formal impact assessment would be required (2,500 m² gross). Consequently, it has been agreed with officers that a formal impact assessment is not required and we therefore address such matters in more qualitative terms.
- 5.37 Convenience provision in Wombwell District Centre includes a range of convenience retailers including Tesco Express, Heron, Fultons, Greggs, Staniforths and a range of other independent butchers and bakers. To the west of the application site towards Barnsley on Wombwell Lane is a retail park including a large Tesco Extra superstore. South of Wombwell is the Cortonwood Retail Park with a Morrisons superstore and a range of comparison retailers.
- 5.38 Aside from convenience provision and as described earlier, the district centre contains a range of other uses including some comparison retail. The latter includes a large Wilkinsons, Poundstretcher, mens and ladies fashion shops, jewellers and a variety of charity shops. Other uses includes banks/building societies, betting shops (BetFred, William Hill & Ladbrokes), library, place of worship, florists, travel agents, hairdressers, beauty salons, offices, cafes, restaurants, public houses, hotel, dental surgery, doctors surgery, Wombwell District Operatic Society, Sports and Social Club, offices and some dwellings.
- 5.39 The health of Wombwell district centre was recently assessed as part of an Inquiry dealing with proposals to expand the Cortonwood Retail Park. The appeal was allowed.
- 5.40 *The Inspector concluded that the district centre is the largest centre in the district outside Barnsley itself. The Inquiry was presented with evidence from the 2010 Barnsley Smaller Centres Study (England & Lyle) which found that Wombwell is a popular and well used centre with a good diversity of town centre uses.*
- 5.41 The Inspector agreed with England & Lyle's assessment that the centre had a better than average vitality and viability index and a relatively low vacancy rate. The most recent GOAD Report published for the centre suggests a vacancy rate of 6.4% whilst the average national GOAD vacancy rate was around 12.6%. Evidence at the Cortonwood Inquiry also indicated a similarly low vacancy rate.
- 5.42 The findings of the Smaller Centres Study, as reported by the Inspector, concluded it is a centre which has a significant number of strengths and performs strongly as a local centre for its immediate hinterland. The Inspector noted that this strength is maintained despite competition from two out of centre retail parks including Cortonwood and Stairfoot (Tesco and retail warehouse operators). Our own observations of the centre is that it is a popular and well used centre for those living in the Wombwell area. It provides a reasonable range and choice of retailers for a district centre along with a wide variety of other uses.

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- 5.43 The proposed development would incorporate retail floorspace and Farmfoods. Whilst some trade may be diverted from Wombwell District Centre as well as a range of other food shopping destinations in the surrounding area, our observations is that Wombwell centre performs well and attracts a loyal and local customer base. We consider that any trade loss from the centre will be limited and would not be likely to lead to 'significant adverse impact' on the centre as a whole, the NPPF impact test.
- 5.44 Against the above background, we do not consider there to be any sequentially preferable sites which are suitable and available for the proposed development in or on the edge of Wombwell district centre. Neither do we consider the proposed development would give rise to significant adverse impact on Wombwell district centre.

6.0 Conclusions

- 6.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 stipulates that if regard is to be had to the Development Plan for the purposes of a determination to be made under the Act, determination is to be made in accordance with the Plan unless material considerations indicate otherwise.
- 6.2 The Development Plan comprises the following:
- The Barnsley Core Strategy (September 2011)
 - Barnsley Unitary Development Plan (UDP) (December 2000) (Saved Policies)
- 6.3 Whilst the development plan provides the starting point for our assessment, the NPPF represents an important material planning consideration.
- 6.4 With regard to retail policy considerations, Section 5 addresses relevant issues including the sequential and impact tests for a proposed out of centre development.
- 6.5 Our investigations and assessment shows there are no suitable and available sequentially preferable sites in or on the edge of Wombwell District Centre which could accommodate the proposed development taking account of the need for flexibility.
- 6.6 Neither do we consider the trading impact of the proposal would give rise to significant adverse impact on Wombwell centre.
- 6.7 In light of the above and taking account of relevant material considerations, primarily the NPPF, we find no material conflict with retail planning policy.
- 6.8 Adopted UDP Policy S1 does not preclude retail development outside existing centres. Policy S3 incorporates the sequential test which is addressed in Section 5.0. In relation to criterion (c) we consider the site to be accessible by a choice of transport mode.
- 6.9 Equally, we have had regard to relevant retail policies in the adopted Core Strategy and find no conflict with Policy CSP31. Wombwell centre is a vital and viable centre with many strengths. The proposed development would not lead to significant adverse impact on the centre as a whole.
- 6.10 In light of the above we consider the proposed development would accord with the development plan in relation to the consideration of retail policies.
- 6.11 On this basis and given the findings of the wider planning issues addressed in the submitted Planning Statement, we consider permission can be granted and there are no material considerations which warrant a decision otherwise.