RETAIL ASSESSMENT

Proposed Relocation of KDA Wholesale Ltd
Trade Warehouse

Land at Unit 4, Fall Bank Crescent
Fall Bank Industrial Estate, Dodworth
Barnsley, S75 3LS

Project Title:	Change of use of Unit 4 Fall Bank Industrial Estate, Dodworth, Barnsley
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Client Company Name:	KDA Wholesale Ltd

CONTENTS

APPENDICES

1.0 INTRODUCTION & BACKGROUND

1.1 This Report addresses National Planning Policy Framework (NPPF) and development plan retail policy considerations insofar as they apply to a proposed change of use of Unit 4 on the Fall Bank Industrial Estate on Fall Bank Crescent in Dodworth near Barnsley, for a proposed trade warehouse business to be operated by KDA Wholesale Ltd.

1.2 KDA Wholesale currently operates out of Unit 8 of the Fall Bank Industrial Estate which is much smaller than the application site premises. Due to expansion plans and the desire to stay in the Dodworth area, Unit 4 provides the only unit of an appropriate size for the growing business. Remaining local has a number of advantages not least of which is the transfer of jobs from the existing premises to Unit 4 but also creation of new jobs in the area and continued commitment to the local economy of Dodworth whilst reusing a run-down vacant warehouse unit.

1.3 This report solely addresses retail policy considerations and therefore should be read in conjunction with other reports and information submitted in support of the application. General planning issues are addressed in a separate Planning Statement and an assessment of the likely highway impact the relationship to sustainable development policy objectives is considered in the submitted Transport Statement.

1.4 The report proceeds as follows:

- **Section 2** describes the site;
- **Section 3** describes the proposed development;
- **Section 4** sets out our review of background studies addressing retail issues in the Borough and existing shopping provision in the area;
- **Section 5** provides an assessment of retail policy considerations and our conclusions.

2.0 SITE DESCRIPTION & LOCATION

2.1 The overall site measures 2.15 hectares (5.3 acres). It includes Unit 4 and surrounding land on the Fall Bank Industrial Estate, Fall Bank Crescent in Dodworth, near Barnsley. Dodworth lies close to Junction 37 of the M1 Motorway affording it good links with the strategic road network and making it an excellent location for distribution type uses including KDA Wholesale Ltd, which predominantly serves smaller businesses in South Yorkshire and beyond.

2.2 The site itself comprises an existing industrial unit (Unit 4) with associated land including parking areas. Access is taken from Fall Bank Crescent along the northern site boundary. The existing building sits in the western part of the site with parking and circulation areas to the east, north and south. The building sits at a slightly lower level to other development to the west. Fall Bank Crescent rises gradually as it passes the site to the west.

2.3 The existing building measures around 6,017 m^2 gross. Its construction is typical of warehouses on an industrial estate comprising a purpose built unit of steel portal frame construction with clad elevations set beneath a pitched roof.

2.4 To the north, west and east of the site are other units on the Fall Bank Industrial Estate. To the south the boundary is marked by the railway line, beyond which are residential areas in Dodworth. The site's boundary is marked by a concrete post and wire mesh fence with tree planting and other soft landscaping inside the boundary fence.

3.0 THE PROPOSED DEVELOPMENT

3.1 The proposal represents relocation of an existing business currently occupying Unit 8 on the Fall Bank Industrial Estate. Due to continued expansion KDA Wholesale Ltd requires additional space to meet demands from trade customers whilst also enabling the wholesale business to serve other members.

3.2 Current estimates are that 80% of existing trade by KDA Wholesale Ltd is supplying small businesses with stock. The latter includes small corner shops, garden centres, garages and market stall holders who operate in various towns. Although traders and shopkeepers predominantly come from the wider South Yorkshire area, some come from much further afield including as far north as Newcastle Upon Tyne and south into Derbyshire. The warehouse is also open to the public and this accounts for around 20% of sales.

3.3 All customers, trade and public are part of a card membership scheme.

3.4 In light of the dominant nature of the business, which is to serve existing traders in surrounding towns, it is vital that the relocation still affords KDA Wholesale Ltd convenient access to the strategic road network. Whilst sustainable development is a clear aim of recently issued national planning policy guidance, with a business such as KDA Wholesale Ltd it is inevitable that many customers will travel by car or van given that they are often purchasing in bulk for their shop/garden centre/market stall. It is also important that in order to be able to provide low cost goods in bulk to the trade, any wholesale warehouse will have to have a clear internal floorplate with plenty of warehouse space which effectively is the trading area. Such units are often found on industrial estates near motorway junctions.

3.5 Notwithstanding the above and as addressed in the main Planning Statement and Transport Statement, the site is accessible by a choice of transport mode for those wishing to travel by an alternative mode. This is especially relevant for employees who will benefit from ready access to buses and trains within easy walking distance.

3.6 In addition it should be noted that the NPPF highlights that sustainable development encompasses much more than access by choice of transport mode. Sustainable development encompasses an economic, social and environmental role. For reasons set out in the Planning Statement and Transport Statement we consider the proposed development would deliver sustainable development.

3.7 In terms of the types of goods sold in the existing trade warehouse unit, the focus is on hardware (i.e. tools and other items such as nails, screws, locks etc), DIY (i.e. shower fittings, sealants, home improvements, decorating materials including paint), car care products, gardening goods (i.e. compost, water butts, garden tools etc) building materials and electrical goods such as light bulbs/sockets/extension leads etc.

3.8 A range of other goods are also sold but in much smaller quantities and cover goods often sold by smaller mixed goods retailers such as general household goods, storage containers, cleaning materials and stationary. There is also a limited range of safety clothing.

3.9 The overall range of goods sold therefore is similar to a typical DIY outlet such as B&Q and Homebase with limited amounts of other goods, rather than a range of goods typically sold by high street retailers.

3.10 As indicated earlier, the business has grown during the recession and the owner wants to relocate and expand to meet growing demand by existing small traders. The intention in the larger unit is to expand the gardening and hardware ranges to include a greater variety of handtools and hardware as well as building materials especially timber and decorative stone and concrete products, and also a wider plumbing, workwear and paint range. The new unit will also include an ancillary cafe for customers.

3.11 The increase in floorspace from the existing unit to the proposed relocation unit is set out overleaf.

Floorspace	Existing Floorspace (m^2)	Proposed Floorspace (m^2)	Additional Floorspace (m^2)
Net	1,269	2,780	1,511
Gross	2,387	6,017	3,630

Notes: 1. Net floorspace excludes ancillary offices and storage areas

4.0 EXISTING & PROPOSED SHOPPING PROVISION

<u>Background Council Studies on Retail Provision/Capacity</u>

England & Lyle (E&L) Smaller Centres Study – November 2010 (SCS)

4.1 When considering retail impact issues, any potential impact must be considered in the context of the vitality and viability of a particular centre. The SCS assessed the health of all centres in the Borough including Dodworth.

4.2 The Council commissioned E&L to undertake an assessment of centres in the Borough outside of Barnsley in 2010. The Smaller Centres Study (SCS) was published in November 2010. Dodworth is identified as a 'local centre' on Figure 2 (page 22) of the SCS. It represents one of 12 local centres in Barnsley MBC's area. Along with other centres, the SCS assessed the current health and function of Dodworth Local Centre informed by the results of a 2007 household shopping survey.

4.3 The SCS reviewed changes in the various centres since 2003. In relation to Dodworth (paragraph 4.41), the data indicates that since 2003 there has been a slight increase in the total number of units in the centre (23 to 27) with all retail uses increasing slightly from 12 to 13 units. Whilst vacant units have increase slightly since 2003 (0 to 1), there has been a reduction in vacant units from 2007 when there were 3 vacant units in the centre. With 1 vacant unit in November 2010, this represents a vacancy rate of 3.7% which can be compared against the Experian GOAD national average vacancy rate in existing centres of 13%. This suggests a healthy centre.

4.4 In 2010 England & Lyle (E&L) concluded that overall there had been an increase in the total number of retail and service uses in Dodworth since 2003/2007, largely in comparison goods and services.

4.5 The SCS highlighted the linear nature of the local centre in Dodworth with its retail offer dispersed in close proximity to the central road junction in the settlement. The overall diversity of uses within Dodworth was considered to be 'fair' and given the limited changes since then, the current mix of uses is much as expected for a local centre although the comparison offer was regarded as good compared to other local centres in the Borough. However, comparison representation was only slightly above the national average (Experian GOAD) in terms of proportion of units in comparison retail use.

4.6 The SCS found the amount of shopping floorspace in the centre to be good for a settlement the size of Dodworth. The supply of offices was also considered to be good with a number of professional services offices in the local centre. Retailer representation was regarded as fair. Whilst there are no non food multiple retailers in the centre, the availability of independent/specialist retailers in the centre was rated as good. This included a shoe shop, music shop, antiques shop and jeweller. Convenience provision includes the Budgens supermarket and a small convenience store. Car parking provision in the centre is good with parking at Budgens and some on street parking. Buses and trains link Dodworth with surrounding towns including Penistone, Barnsley, Silkstone and Holmfirth. The environmental quality of the centre is relatively good with a number of attractive and historic buildings in the centre which have been maintained to a good level. There do not appear to be any significant environmental problems in the centre such as noise, litter or pollution. Movement around the centre is reasonable with good pavements along the High Street.

4.7 The SCS concluded that there was limited opportunity for expansion of the local centre in Dodworth and therefore the overall capacity for the centre in terms of growth or change was found to be poor. This reflects the centre's location surrounded by residential areas with no opportunities for expansion of the centre.

4.8 Overall, the SCS concluded the centre's vitality and viability was above average. Main strengths identified include the amount of shopping floorspace for a local centre, the supply of offices, availability of pubs, cafes and restaurants, low vacancy rate, lack of charity shops, feeling of security, ease of access to main attractions, physical appearance of properties and generally a good environmental quality of the centre. Weaknesses included opportunities for expansion of the centre and lack of non food multiples. The latter is not unusual in a local centre and overall, we consider the centre to be relatively strong and healthy. Its 'quality' rating in the SCS was good and it had the equal highest quality rating for a local centre in the Borough (page 253).

4.9 The SCS also assessed shopping patterns in the Barnsley area and found that in relation to Dodworth, residents looked mostly to Barnsley to meet their shopping needs. This is not surprising given the proximity of Dodworth to the Barnsley area. In this respect most convenience goods shopping goes to Morrisons and Asda whilst comparison shopping largely goes to Barnsley town centre. What is evident from the above is that Dodworth local centre performs well in the context of its designation as a 'local centre' and in some respects the SCS found it more in line with a typical district centre. In advising on the future approach to Dodworth local centre in the emerging LDF, the SCS recommended that consolidation takes place due in part to the absence of sites upon which to accommodate any expansion of the centre.

4.10 An update land use survey was carried out in July 2012 to inform this Retail Assessment. This showed that since the November 2010 SCS, the total number of units identified remain the same and there has been limited change in the intervening period. Specialist comparison shops such as the music shop (PJs Music), footwear (Payne & Sons), jewellers (William & Julia Shaw), carpets (Woodward Carpets), florist (Tulip Flowers) and watch/clock menders (Past Times) with collectables and antiques are all still trading. The comparison offer is specialist in nature and directed to particular customers. There is no cross over between comparison shops in Dodworth local centre and the goods KDA Wholesale sells. The latter focuses more on DIY type goods.

4.11 Changes in the local centre since the November 2010 SCS survey includes a coffee shop (Cafe Cocoa) which replaces a gift shop, two new vacant units with one formerly vacant unit now occupied by a pizza takeaway (Nino's Pizza).

4.12 The general mix and range of retailers in the local centre remains unchanged from November 2010. Whilst two units have become vacant one formerly vacant unit is occupied and another unit changed hands. This shows a natural turnover of units as even healthy centres will have vacancies due to leases coming to and end and before new occupiers take the available space.

4.13 The local centre of Dodworth continues to serve a food shopping function with Budgens in the centre. The local centre is supplemented by a range of other uses such as the library, post office, pharmacy, doctor's surgery, public house, communal centre, chiropractic centre, hairdressers, Working Mens Club, bookmakers and restaurants.

4.14 Overall, we consider that for a local centre Dodworth has a good mix of retail and service related uses. The local centre predominantly includes independent traders. A number operate within a niche market and clearly attract a loyal clientele. None of the shops in the local centre compete with the existing or proposed expanded KDA trade warehouse operation.

Barnsley Town Centre Retail Capacity Study (March 2011)

4.15 The Council commissioned E&L to update a Town Centre Retail Capacity Study carried out by DTZ in 2007. The update Study examined future potential capacity to accommodate further developments in Barnsley town centre based on a market share approach. This utilised the findings of a 2007 household shopping survey carried out as part of the DTZ study. The E&L report also updated the 2007 DTZ health check for Barnsley town centre.

4.16 Main conclusions arising from the study in relation to the town centre and the need for additional convenience and comparison provision are as follows;

- The town centre has a moderately better than average level of vitality and viability and it has continued to perform relatively well during the current economic recession.
- In relation to **qualitative need** and the five factors identified in the PPS4 Practice Guidance (PG), the report concluded in the context of comparison shopping that:
    - There is a deficiency in the type and range of non-food shopping provision in the town centre;
    - In particular there is a lack of a major department store; and

- The Markets development will play a part in addressing the town centre's existing deficiencies and help provide higher quality non food retailing choice in the town centre.

- In relation to **quantitative need** and adopting a market share approach, the Study examined four scenarios in relation to comparison shopping. The study confirmed that the assessment of future capacity was based on anticipated increases in market shares that could occur if committed retail developments take place and made no allowance for new schemes potentially increasing market share retention in the Borough. Consequently, whilst the study concluded no quantitative need for additional comparison provision at 2016 but additional capacity coming on stream during the period to 2021, this was based on existing market share/known commitments and made no allowance for further schemes to increase market share retention.

4.17 In terms of the vitality and viability of Barnsley Town Centre, we note that March 2011 update study concluded it was a centre that continued to perform relatively well during the current economic recession and there were opportunities for growth in the centre (paragraphs 5.33-5.35). E&L concluded the centre was sufficiently robust to withstand the introduction of the Markets scheme which it considered should bring about a positive improvement in the vitality and viability of the town centre overall, making it more attractive to shoppers.

4.18 The town centre was found to have a number of strengths including its overall capacity to grow and change, a good representation of street markets, a relative lack of undeveloped sites, good pedestrian flow, good accessibility by public transport, a safe and secure environment with CCTV and good quality open spaces/landscaping. There were opportunities identified where the centre could improve in terms of overall diversity of uses, retailer representation for a centre of the size of Barnsley and car parking.

4.19 From the findings of the March 2011 E&L Update and our own observations of the centre, we consider it to be a centre in reasonable health.

Existing Comparison Shopping Provision in Barnsley

4.20 Comparison shopping in the Borough is focused in Barnsley town centre with three major retail parks outside the town centre including the Peel Centre Retail Park, Stairfoot Retail and Business Park and Cortonwood Retail Park. The retail parks have a variety of representation including bulky goods type retailers.

4.21 Barnsley Town Centre is the main comparison shopping destination in the Borough supplemented by retail parks and other out of centre stand alone retail units. The Experian GOAD report for the town centre (June 2010) indicated a total of 448 units with comparison shopping representing the main retail sector occupying 142 or 31.7% of all units which is around the GOAD average for the UK (33.4%).

4.22 Comparison retailers in the town centre occupied 35,544 m^2 gross of the 114,211 m^2 total floorspace in the centre. This represents 31.1% of all floorspace compared to the national average of 36.9%. The figures suggest that although comparison retailers occupy around the average proportion of units in the town centre compared to the national average, the floorspace occupied is slightly below the national average. This is likely to reflect the absence of larger units to accommodate the needs of modern retailers. The Markets redevelopment will help address such provision.

4.23 Notwithstanding the above and as demonstrated by the results of the household shopping survey (see below) Barnsley is a popular comparison shopping destination for residents in the Borough. Comparison retailers in the centre include a good range of national multiples such as Marks & Spencers, Argos, Boots, T K Maxx, W H Smith, Wilkinsons, New Look and Superdrug along with a number of specialist/independent shops.

4.24 In terms of existing comparison retail provision outside the town centre, the Stairfoot Retail Park includes B&Q Warehouse with other out of centre retailers close by on Wombwell Lane (A633) next to the Tesco Extra store. Retailers include Allied Carpets, Harveys and Dunelm.

4.25 Retailers on the Peel Centre Retail Park include retailers such as Currys, JJB, Pets at Home, Halfords and Bathstore.com. Close to the Peel Centre Retail Park is the stand alone PC World unit by Old Mill Lane. Further north is Wickes.

4.26 Cortonwood Retail Park is located to the south east of Barnsley and incorporates a number of retailers including Asda Living, SCS, Halfords, B&Q, Sports Direct, Boots, Argos, Next and Matalan.

4.27 The 2007 Council commissioned household shopping survey asked respondents about food and non food shopping patterns in the surrounding area. The questionnaire asked respondents which centre they would regard as their household's main shopping centre. Barnsley was the most popular (70.3%) with Meadowhall (9.3%) second. In Zone 2 (which includes Dodworth and Penistone to the west), Barnsley was most popular with 65.8% of respondents regarding Barnsley town centre as their main centre. The other main destination was Meadowhall (10.8%) with a further 9.9% looking to Penistone.

4.28 The household survey also looked at shopping patterns for specific types of comparison goods. In relation to Zone 2 respondents the following patterns emerge:

- Fashion goods - 35% shopped in Barnsley town centre, 27.9% Meadowhall and 10.8% Sheffield;
- Furniture, carpets and other floor coverings - 37.8% visited Barnsley town centre, 15.3% destinations in Sheffield and 3.6% Cortonwood Retail Park;
- Household textiles and soft furnishings – 42.3% Barnsley town centre, 14.4% Sheffield stores, 8.1% Meadowhall, 6.3% Cortonwood Retail Park and 3.6% Wombwell Lane/Stairfoot Retail Park;
- Household appliances – 52.3% Barnsley town centre, 10.8% Sheffield stores, and 3.6% Meadowhall;

- Audio visual equipment – 48.6% Barnsley town centre, 13.5% Sheffield shops, 4.5% Meadowhall, 2.7% Cortonwood Retail Park and 2.7% Peel Centre Retail Park;
- Hardware, DIY goods etc – 45.9% Barnsley town centre, 13.5% B&Q Stairfoot, 9.9% Cortonwood Retail Park, 7.2% Sheffield stores and 3.6% Wombwell Lane/Stairfoot Retail Park;
- Chemist and medical goods – 51.4% Barnsley town centre, 12.6% Penistone, 9.9% Meadowhall, 8.1% Sheffield stores.

4.29 As can be seen from the above the retail parks attracted more bulky goods/DIY type purchases although Barnsley Town Centre still retained a reasonable proportion of comparison shopping trips across the range of goods.

4.30 The primary retail area in Barnsley Town Centre is concentrated on Cheapside and Queen Street, taking in the Alhambra Shopping Centre. Secondary retail areas are situated on Market Street, New Street, Peel Square, Peel Street, Eldon Street and The Arcade.

4.31 The Markets redevelopment is moving forward with the grant of permission (2011/0714) in September 2011. Although not as ambitious as earlier proposals, the current proposal will regenerate a substantial area in the town centre and lead to the provision of a department store, multiplex cinema, market hall and substantial additional retail floorspace as well as new restaurants and other town centre uses. General environmental improvements will also add to the regeneration of that part of the town centre.

4.32 The town centre has seen other substantial new investments over recent years including:

- Westgate - 6,000 m^2 office development;
- The Transport Interchange;
- Gateway Plaza - 11 storey mixed use business and residential development on the north western edge of the town centre

providing over 11,000 m^2 of office accommodation, 188 apartments, a 110 bedroom hotel and other retail and cafe space;

- Civic and the Lanes; and
- Former Pioneer Site – permission for a new Lidl foodstore (1,617 m^2 gross) and a second retail unit (2,694 m^2 gross).

5.0 RETAIL PLANNING POLICY CONSIDERATIONS

Development Plan Policy

5.1 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 Yorkshire and Humber Plan - RSS to 2026 (May 2008)
- The Barnsley Core Strategy (September 2011)
- Barnsley Unitary Development Plan (UDP) (December 2000)

RSS for Yorkshire & Humber (2008)

5.2 The RSS was revoked by the Coalition Government in July 2010 but reinstated following a High Court challenge (November 2010). Notwithstanding this and following royal ascent being given to the Localism Act 2011 it is anticipated that although forming part of the development plan it is likely to be withdrawn in due course and therefore limited weight should be given to it in determination of applications.

5.3 **Policy SY1** seeks to transform town centres as vibrant, healthy, accessible, attractive and safe places where more people live, visit and work. For reasons set out below, we do not consider that the proposed expansion of an existing trade warehouse business in Dodworth would give rise to planning concerns regarding the future vitality and viability of either Dodworth local centre or Barnsley town centre.

Barnsley Core Strategy (2011)

5.4 The Core Strategy (CS) was adopted in September 2011. The key diagram sets out the Borough's settlement hierarchy and identifies Dodworth as forming part of the wider Barnsley urban area. Urban Barnsley and the Principal Towns are to be the focus of future development including housing, employment, shopping, leisure, education, health and cultural activities and facilities enhancing their roles as accessible and vibrant places to live. The

Core Strategy seeks to retain and improve local services in Dodworth (paragraph 7.11 of CS).

5.5 **Policy CSP31** (Town Centres) supports maintenance and enhancement of the vitality and viability of town centres. We do not consider the proposed development materially conflicts with this policy objective. The proposed development would largely serve the trade sector incorporating small businesses/shop keepers as well as market stall holders in Barnsley Town Centre and elsewhere. Therefore, far from adversely affecting the vitality and viability of Barnsley or Dodworth Town Centre and for reasons set out below in the context of our assessment of NPPF issues, we consider the proposed increase in size of unit provided by the relocated trade warehouse would support town centres. This would be by making goods available to smaller retailers at competitive rates enabling them to form part of the wider town centre offer contributing to a strong independent representation in those centres.

Barnsley Unitary Development Plan (UDP)(2000)

5.6 The UDP was adopted in 2000 and is being replaced by DPD's in the emerging LDF. The Core Strategy was adopted in September 2011. Consequently and having regard to the advice in Annex 1 of the NPPF, full weight of a Section 38(6) development plan cannot be given to remaining saved policies in the adopted UDP as they were adopted after the 2004 Act.

5.7 **Policy S1** directs new retail development to locations within the central shopping area of Barnsley town centre and other centres. The proposed development is for a larger trade warehouse unit compared to the existing operation in Unit 8. A location in Dodworth near Junction 37 of the M1 is regarded as essential to enable smaller traders to be able to access the unit conveniently from the strategic road network. The existing trade warehouse operation in Unit 8 serves customers as far afield as Newcastle in the north east to traders across South Yorkshire and Derbyshire and Skegness in the east.

5.8 Given that goods are generally purchased in bulk and taken back to the respective retail outlets for sale, it is important the site is accessible for those travelling by car or van. Trade customers travel from as far away as Newcastle, Skegness and Derbyshire to buy goods. A location elsewhere would lead to inconvenience for customers and would also affect KDA Wholesale Ltd being able to offer goods at the price they do which makes them affordable to small businesses.

5.9 **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 or (b) where there are no suitable or available sites within or on the edge of an existing defined centre. Where no suitable sites are available either within a defined centre or in accordance with (a) and (b), locations out of centre should be accessible by a choice of transport mode. As set out below there are no suitable and available sites in or on the edge of existing relevant centres (Barnsley Town Centre, Dodworth local centre) to accommodate the larger KDA Wholesale Ltd unit.

Material Considerations

National Planning Policy Framework (March 2012)

5.10 The NPPF was published on 27th March 2012. Paragraph 1 of the NPPF sets out the government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions (paragraph 2) and replaces virtually all PPS's/PPG's. It constitutes guidance for local planning authorities and decision takers as a material consideration in determining applications (paragraph 13).

5.11 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). Three dimensions to sustainable development are identified: economic, social and environmental (paragraph 7). In this context the planning system is to perform a number of roles:

- An **economic** role – contributing to building a strong, responsive and competitive economy;

- A **social** role – supporting strong, vibrant and healthy communities by, amongst other things, creating a high quality built environment with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- An **environmental** role – contributing to protecting and enhancing the natural, built and historic environment.

5.12 In relation to retail policy considerations, the NPPF seeks to ensure the vitality of town centres. In this context the NPPF includes reference to both the 'impact' test and the 'sequential approach' to site selection.

5.13 Paragraph 24 of the NPPF indicates that local planning authorities should apply a sequential approach 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. Planning authorities should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale. The latter confirms that as much as applicants are to be flexible, LPA's are also to show flexibility. In this case the proposed development relates to the expansion of a trade warehouse business and consequently requires a particular type of premises at relatively low cost to enable it to attract 'trade' businesses.

5.14 Impact assessments are required for retail, leisure and office development outside town centres which are not in accordance with an up to date Local Plan and for developments over a threshold of 2,500 m^2 unless there is a locally set threshold. There is no local threshold in the relevant development plan.

5.15 Notwithstanding the above, given the nature of the proposed development (i.e. a trade warehouse) and the limited sale of goods to the general public (i.e. 20% of the business to members of the general public), it is questionable whether a retail impact assessment is necessary for such a limited uplift in turnover attributable to sales to the general public (see below). Notwithstanding this the Council have requested that retail impact is considered proportionate to the level of uplift and likely nature of any impacts. This report addresses retail impact issues.

5.16 Paragraph 26 of the NPPF sets out the two impact tests to be addressed including impact on existing, committed and planning public and private investment in a centre or centres in the catchment area of the proposal and the impact of the proposal on the vitality and viability of existing centres.

5.17 Where an application fails to satisfy the sequential test or is likely to have a significant adverse impact on one or more of the factors identified above, it should be refused.

5.18 In addressing the **sequential approach** the NPPF highlights the location sequence of town centre, edge of centre and then out of centre. Following discussions with the Council it has been agreed that the centres of relevance for consideration under the sequential approach are Dodworth Local Centre and Barnsley Town Centre. Sequentially preferable opportunities are to be suitable and available (NPPF). When considering the sequential approach the old PPS4 Practice Guidance (PG) also makes reference to viability issues.

5.19 Dodworth Local Centre serves the local community of Dodworth and surrounding villages. Existing shopping provision is dominated by independent traders and the centre has a retail offer beyond what might normally be expected in a local centre. The centre is identified on the adopted UDP Proposals Map extending along the High Street from its junction with Green Road/Station Road. Being located in the heart of the settlement there are no real opportunities for expansion, a conclusion reached by the November 2010 SCS. To the north of the centre is the Police Station and existing housing as well as a school and associated playing fields. To the north east is further housing. South of the centre are predominantly residential areas with some open space. The centre itself has few development opportunities and nothing of any significance which could accommodate a large warehouse unit. There are no sequentially preferable sites in Dodworth local centre which could accommodate the proposed development.

5.20 In relation to Barnsley Town Centre there are no sites within the centre capable of accommodating a large warehouse unit. The only area coming forward for redevelopment is the Markets, which is subject to proposals for demolition and redevelopment for a comparison based shopping centre scheme which would integrate with the existing town centre offer. Given the nature of the proposed development such a site would clearly not be viable or suitable and in any event is not available.

5.21 Other potential sites identified during the course of discussions with the Council include the following sites.

- Land at New Street
- Former YEB Depot Site and Gala Bingo

5.22 The first site listed above (New Street) is subject to current redevelopment proposals for a superstore and is located immediately south of the existing Morrisons. The proposal is still being considered by the Council and at present is not available for this form of development. Given the intended use of the site for a superstore and its location proximate to the main shopping area in Barnsley, we consider it is not available for a 'trade warehouse' use and should therefore be discounted.

5.23 The second site listed above includes an area of land to the north east of the core shopping area. It includes the existing Gala Bingo and car park and also land to rear referred to as the former YEB depot. The overall site could not be regarded as 'in centre' and at best is edge of centre. Furthermore, there is no indication that the Gala Bingo is looking to relocate. It can therefore only be assumed that to persuade them to relocate would require any developer to provide them with a relocation site and secure the appropriate planning consents. The cost of doing so would be prohibitive for a trade warehouse operator to withstand in the context of the proposed expansion such that incorporation of the Gala Bingo site would not offer a realistic prospect. In any event it is understood that Gala are not seeking relocation.

5.24 To the rear of the Gala Bingo site is an existing primary sub-station. Relocation costs would be significant and would include acquisition and preparation of a new site for the primary sub-station and its provision before the existing sub-station could be disconnected and removed. The up-front costs of such an operation to ensure continuity of supply for the wider area would be prohibitive in terms of viability alone for the applicant given the nature of the proposed development and the trade warehouse business model. On this basis we consider the area covered by the primary sub-station should be discounted from the site area.

5.25 This would leave the former YEB site on land to the rear as a potential site with limited visibility towards the core shopping area. It is questionable whether this area should be regarded as edge of centre. A previous Donaldsons Study carried out for the Council in 2003 regarded this site as too remote from the main shopping area to be suitable for retail uses.

5.26 Whilst the site benefits from outline planning permission for retail development in the form of bulky goods retail warehouse units incorporating a food element, it is considered that it is not suitable for the proposed form of development. Given the low cost and predominant trade focus of the proposed development, it is questionable whether such a use would represent a viable development for such a site compared to the value of the extant retail permission on the former YEB site. In addition and as indicated above it is questionable whether the site should be regarded as edge of centre once the Gala Bingo land and primary sub-station are excluded. On that basis it could be regarded as out of centre.

5.27 Early discussions with the Council in the context of the proposed relocation of KDA Wholesale Ltd to Unit 8 on the Fallbank Industrial Estate suggests that officers regarded the relocation site in Dodworth as edge of centre, which would be sequentially preferable to the former YEB site. In any event and for reasons indicated above we do not consider the former YEB site to be suitable for the proposed development.

5.28 Against this background we do not consider there are any sequentially preferable sites for the proposed development that are suitable and available.

5.29 In dealing with 'location' issues, we would also highlight the importance of locating a trade warehouse such as proposed by our client, close to the strategic road network. It is not a traditional Class A1 retail use and this is reflected in the use class of trade warehouses (sui generis). Consequently, whilst government policy seeks to direct new retail development to town centre's first, it does not preclude development elsewhere. Given the nature of the proposed business model which is targeted primarily at the 'trade' sector and the limited level of sales to the general public membership (20% of sales), we consider there are grounds to support the location of such a use near the strategic road network rather than embedded in an urban area away from the main road network where existing small traders/shopkeepers etc would not find it convenient to get to.

5.30 In dealing with **retail impact** the context of arriving at judgements on the nature of any impact on existing centres and its significance is an understanding of the health or vitality and viability of centres which could be affected. In this case it has been agreed with officers that consideration should be given to impact on Dodworth local centre and Barnsley Town Centre.

5.31 The England & Lyle SCS looked at the health of Dodworth local centre whilst the March 2011 Update Study assessed the health of Barnsley Town Centre. We refer to the findings of these assessments in **Section 4.0** which have been supplemented with our own observations of the respective centres. In both cases the centres are concluded to be in reasonable health.

5.32 Dodworth provides a wider offer and choice of retailers than might normally be anticipated in a local centre and clearly has a loyal customer base. It has a good variety of specialist comparison traders and is supported by a range of other services including a local library, community centre and health centre with pharmacy. Local convenience shopping is provided for by Budgens with its surface level adjacent car park. The latter acts as general parking for the centre as a whole. Barnsley town centre continues to perform relatively well notwithstanding the current recession and the proposed Markets redevelopment scheme will give the centre a boost when it comes on stream.

5.33 Against this background we consider the anticipated impact of the relocation and enhancement of the KDA Wholesale Ltd operation. As set out in Section 2.0 the proposed uplift in floorspace is around **1,511 m^2 net**. The intention is to provide a more spacious layout to enable the better display of existing goods in the warehouse unit whilst also enhancing the offer in certain goods categories and expand some of the ranges along with providing an ancillary cafe for customers.

5.34 When considering retail impact issues, it must be remembered that this is within the context of the existing trade warehouse operating with a net sales area of 1,269 m^2. Existing shops and centres have been assessed and been found to be in reasonable/good health in terms of their vitality and viability. What is being assessed in this Report is the likely effect of the uplift in floorspace and therefore sales on existing centres in surrounding area. In doing so it must also be remembered that the vast majority of sales is to the trade sector and not individual members of the public. The current split is 80%/20% and this is anticipated to be the case in the future.

5.35 As already highlighted, the range of goods that will be sold in the larger unit are similar to typical ranges sold by out of centre DIY retailers such as B&Q. The retail offer does not cross over significantly with typical high street sales such as fashion/clothing and other comparison shopping. In relation to impact on Dodworth local centre, the relocated KDA trade warehouse would not sell musical instruments, high class jewellery, footwear or carpets. Neither would it compete with other retailers in the centre including the pharmacy. It would not draw visitors away from more service related traders such as bookmakers, barbers, hair dressers or the clock/watch shop/menders. We do not see any cross over in types of goods sold in the existing or relocated unit with traders or other uses in Dodworth local centre and consequently any impact would be imperceptible.

5.36 In relation to stores in Barnsley, most of the existing shops would not be affected in any way by the proposed relocation. Trade in the relocated unit would most likely be diverted from out of centre facilities such as the B&Q at Stairfoot retail park. Impact on out of centre retail uses is not a material planning consideration.

5.37 Notwithstanding the above, the results of the borough wide household shopping survey (2007) showed that some residents in Zone 2 (includes Dodworth) shopped in Barnsley Town Centre for various goods that are currently sold in the existing KDA trade warehouse unit and which would be sold in the relocated unit. Consequently, we have assessed the likely impact consequences on the comparison turnover of Barnsley Town Centre in more detail below.

5.38 The uplift in floorspace anticipated from the relocation will be around **1,511 m^2.** The existing Warehouse trades from around **1,269 m^2 net**. Given the nature of goods sold in a trade warehouse (i.e. more bulky goods and DIY related products) the turnover of the existing unit is not substantial. Published data for operators such as B&Q and Homebase suggest an average sales density across the sector in the order of £1,600 per m^2. This is based on multiple retailers and clearly there will be variations either side of this for particular operators. This is broadly in line with current annual trading levels of the existing KDA trade warehouse unit. Based on a sales density of £1,600 per m^2 this would deliver a current turnover of **£2.03m**. The turnover can be split between 'trade' (i.e. businesses) or £1.6m (80%) and membership from the general public (£0.43m or 20%).

5.39 Assuming the uplift in net floorspace of **1,511 m^2** achieves the same sales density as the existing store this would equate to the uplift in turnover of **£2.42m** (1,115 m^2 x £1,600 per m^2) giving a total turnover in the relocated Unit 4 of **£4.45m** over a period of time. It is unlikely that the operator will achieve an increase in sales based on current trading sales densities as the relocation will enable him to provide a better internal layout of the trade warehouse providing more room between display aisles. Consequently, part of the expansion will effectively lead to the sale of the same goods but on a larger floorspace. Clearly there will be some uplift in trade with the expanded ranges highlighted earlier. However, the anticipated uplift in trade of **£2.42m** would be at the upper end of any potential increase in turnover.

5.40 Assuming the increased turnover (**£2.42m**) functions in the same way as the existing unit (i.e. 80% trade/20% general public) this results in an increase in general public sales of **£0.48m**. The increased turnover from 'trade' sales would support and not divert trade from existing centres as it provides low cost goods to existing traders in various locations. Consequently, the increase in sales to 'trade' would not result in a negative impact on existing centres but should be viewed as a positive impact.

5.41 The anticipated uplift from general public sales is minimal and would be diverted from various destinations. Having regard to the results of the 2007 household shopping survey (see **Section 4.0** for a summary), this would lead to diversion from out of centre retail outlets in the Barnsley area including B&Q at Stairfoot as well as Barnsley Town Centre and a variety of stores in the Sheffield area.

5.42 However, assuming that all of the uplift (**£0.48m**) would be diverted from shops in Barnsley Town Centre, impact would be minimal. The E&L Town Centre Retail Capacity Study (March 2011) estimated the total (comparison and convenience goods) turnover of Barnsley town centre at 2008 (2008 prices) to be **£349.2m** (£28.13m + £321.1m – Tables A & B, Appendix 3 of E&L Study).

5.43 Assuming all the uplift was diverted from the town centre this would result in a trading impact of **-0.1%**. This level of trade diversion would not be perceptible on the turnover performance of the town centre. It should also be remembered that the above estimated turnover for the town centre is at 2008. With spending growth coming on stream since 2008 (even at low growth rates due to the recession) the turnover of the town centre will increase and consequently impact would be less than **-0.1%.** Given such low levels of impact we do not consider the proposed relocation would give rise to significant adverse impact on existing centres.

5.44 Even if half of the uplift in trade (50% of £2.42m or £1.21m) was diverted from the town centre this would only result in a trading impact of **-0.3%.** This would still not be perceptible in terms of the trading performance of the centre as a whole. NPPF seeks to ensure the vitality and viability of centres. The vitality and viability of Barnsley Town Centre and Dodworth local centre would not be harmed by the proposed development.

5.45 In addition to the above and given the nature of the proposed development, we do not consider it would call into question the Markets redevelopment scheme in Barnsley town centre coming forward. The proposal is for a different form of retail and for a use which focuses on the 'trade' sector rather than the general public.

6.0 CONCLUSIONS

6.1 In light of the above and having regard to the NPPF retail policy considerations and development plan policy, we conclude that the proposed relocation and expansion of the KDA trade warehouse;

- Would not adversely impact on existing, committed or planned public and private investment in a centre or centres in the catchment area of the proposal;
- Would not be likely to have a significant adverse impact on the vitality and viability of existing centres, including consumer choice and trade in relevant centres assessed either now or up to five years from the time the application is made;

6.2 In addition to the above, our assessment of potential sequential opportunities leads us to conclude that there are no sequentially preferable sites that are suitable and available for the proposed development.

6.3 We therefore conclude no material conflict with the Section 38(6) development plan for the area or with recently issued national planning policy contained in the NPPF.

6.4 Far from any adverse impacts, we consider there would be a number of positive benefits arising from the proposed investment by KDA Wholesale Ltd. This includes the provision of a better range and choice of goods for small businesses/shop keepers in the surrounding area thus supporting existing centres, the creation of more employment opportunities in the local area and the reuse of a vacant unattractive building on the Fall Bank Industrial Estate.

6.5 In retail policy terms we consider the proposal is acceptable and find no material conflict with the statutory development plan or that there are any material considerations that warrant a decision other than in support of the grant of planning permission.