

Change of Use from Gym (Class E) to Retail (Class E)

Sports Direct Gym,
Easlea Road,
Bury St Edmunds

Appn Ref: DC/21/0427/FUL

Retail Impact Assessment &
Sequential Test

July 2021

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Retail Impact Assessment & Sequential Test

Applicant: K/S Cratfield

July 2021

reference:

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Executive Summary

This Retail Impact Assessment (“RIA”) and sequential assessment sets out information in support of the planning application submitted for a change of use planning application for the existing Sports Direct Gym at Easlea Road, Bury St Edmunds.

The unit has a gross internal floor area of 1667 sq m. At the present time no specific operators have been agreed for the proposed retail unit but there has been strong interest for both convenience and comparison goods retail from the unit. The principal characteristics of the proposed retail format is the provision of a large floorplate unit suitable for a range of potential retail uses such as a discount or mid-sized supermarket, a general (non-food) discounter or a large bulky goods retail unit. Reflecting this the application seeks unrestricted Class E (Retail) use in the unit.

Retail Impact Assessment

A retail impact assessment has been prepared for the proposed development which has been undertaken in line with good practice and has assessed the following:

- The characteristics of existing retail provision and available expenditure within the primary catchment area for the proposed development.*
- The proposed development in terms of: floorspace; turnover; trade draw and trade diversion.*
- Retail impact measured in terms of percentage loss of trade in 2023 taking into account changes between 2021 and 2023.*
- The vitality and viability of Bury St Edmunds City Centre and other retail locations within the town.*
- The assessment has taken into account the cumulative effects arising from retail development that has occurred since the completion of the 2016 St Edmundsbury Retail and Leisure Study.*

The RIA demonstrates that the scale of impact arising on existing town centres will be very low and will not undermine the vitality or viability of the City Centre or any existing centre.

Sequential Approach

A full assessment of potential alternative sites in accordance with the requirements of the sequential approach has been undertaken as set out the NPPF and line with recent legal decisions. This demonstrates that the proposal fully meets the requirements of the sequential approach. The assessment has shown that:

- There are no premises available within or on the edge of the City Centre that meet the minimum requirements for a viable retail development of the types proposed for the application site. This includes the vacant units at Robert Boby Retail Park and High Baxter Street.*
- The Cornhill Walk site is not available, is too small to accommodate the minimum development, would be unsuitable in terms of lack of car parking and servicing access, and is in a sensitive location both in terms of its location in the Conservation Area and adjacent residential properties.*
- Only a limited part of the Tayfen Road site is potentially available (although it is not being advertised as available at the current time) and the site has major development constraints including contamination and flooding. The site does not satisfy the definition of an edge-of-centre site as set out in the NPPF. As such it is not sequentially preferable to the application site.*

Conclusion

This report demonstrates that the proposed development meets the requirements of the policies in the development plan, the NPPF and other material considerations, relevant to the retail impact of the proposed development and application of the sequential approach:

- The proposal will not result in a significant individual or cumulative adverse impact on the vitality and viability of the City Centre or other retail location; and*
- The proposal fully satisfies the requirements of the sequential approach/test.*

1 Introduction

Background

- 1.1 This Retail Impact Assessment (RIA) and Sequential Assessment has been prepared to provide supporting information for the planning application submitted by K/S Cratfield for the change of use of an existing gym (Class E) to retail (Class E) at land at Easlea Road, Bury St Edmunds.
- 1.2 This information has been requested by West Suffolk Council to assist the authority in the determination of this planning application. A scoping note for the RIA and sequential assessment was provided by West Suffolk Council planning officers which is reproduced at Appendix A.
- 1.3 This report provides the following information:
- A description of the proposed development (Section 1).
 - An assessment of the impact of the proposed development on existing retail centres and other retail floorspace (Section 2).
 - A review of the significance of retail impacts arising taking into account the vitality and viability of existing centres (Section 3).
 - An assessment of the proposal in term of the sequential approach/test (Section 4).
 - Summary and conclusions (Section 5).
 - A copy of the Scoping Note is provided at Appendix A and supporting survey information is provided in Appendices B & C.
- 1.4 The approach adopted in the RIA and sequential assessment follows the Guidance issued by the Government on Town Centres and Retail (Assessing proposals for Out of Centre development) issued Sept 2020 (latest available at the time of preparing this report). The nature of all retail impact assessments, and associated analyses, is that the findings and conclusions of the assessments are dependent upon assumptions used for calculation of impact. Therefore, Hargest Planning Ltd would welcome comment on this RIA from officers of West Suffolk Council and would be happy to review the assumptions used in the assessment to identify the potential implications for retail impact. In this sense the assessment presented in this report should not be treated as the final version and may be subject to review subject to the comments of West Suffolk Council planning officers.

Description of Proposed Development

- 1.5 Details of the proposed development are set out in the supporting documents submitted with the application. The planning application is for a proposed change of use only with the gross internal floorspace remaining as existing. For the purposes of this RIA the following are the key characteristics of the proposals:

- *Location:* the proposed development would comprise the existing Sports Direct gym located at Easlea Road, Bury St Edmunds. This site is located within the Moreton Hall employment area which comprises a mix of retail, trade counter, industrial and business premises. Located ca. 150m to the west of the application site is the St Edmundsbury Retail Park (Phase 2) which comprises a range of bulky comparison and general comparison goods retail units. Approximately 250-300m to the north east of the site is the Matalan retail unit (predominantly clothing and footwear i.e., general comparison goods). The employment area also includes a number of other retail units (e.g. House of Harmony) and trade counters units as well as car showrooms, garages and other industrial/employment units.
- *Floorspace:* The existing unit comprises proposed development comprises 1452 sq m ground floor (gross internal) and 215 sq m GIFA mezzanine providing a total of 1667 sq m GIFA. The site is 0.63ha and includes space for servicing, car parking, motor cycle spaces (information provided on planning application form) and for landscaping.
- *Proposed Retail Unit.* At this stage the applicants have not confirmed a specific operator for the proposed retail unit but propose that the use should be for either for a mid-sized supermarket/foodstore (including mainstream supermarket or food discounter) or for a large mixed comparison unit (in particular for a non-food discounter). This market analysis is consistent with the attractiveness of the Moreton Hall area for retail operators. Further information on potential occupiers is set out below.
- *Car Parking.* The existing site has parking spaces for 140 vehicles (including 3 disability spaces) 1 motor cycle and 18 cycle spaces.

Format of the Proposed Retail Unit

1.6 Reflecting market interest for the unit, this report identifies three potential options assessing the unit in terms of retail impact and the sequential test:

- Option A – Food discounter (predominantly convenience with limited general comparison goods)
- Option B – General mid-sized supermarket (predominantly convenience with limited general comparison goods)
- Option C – Non-food discounter (predominantly a mix of general and bulky comparison goods with some convenience).

1.7 The unit would also be attractive to a bulky goods retailer which requires a large clear floorplate. Given that bulky goods retail on the site would generate lower sales densities than Option C and would, primarily, divert trade from other bulky goods shops which are mainly located outside the City Centre (including the St Edmundsbury Retail Park – “SERP”) the retail impacts associated with this option will be significantly lower than the options listed above. Therefore this option has not been expressly addressed in this report.

Option A – Food Discounter

1.8 In the current market the size of this unit would limit the potential operators to either of the discount foodstore operators (i.e. Lidl or Aldi).

- 1.9 Discount foodstores have particular characteristics that distinguish them from mainstream supermarkets and they, primarily, serve local catchment areas (typically in the region of 15-20,000 catchment population). The key features of these operations are:
- Limited ranges of goods (typically 1500-2000 lines compared to 15,000-20,000 in superstores).
 - Relatively small size of shopping trip.
 - A high proportion of space devoted to convenience goods compared to superstores.
 - Predominance of own-brand goods.
 - Store operation based on the minimisation of operational costs – this includes factors such as, where possible, single goods delivery per day, direct transfer of goods onto shop floor and similar.
 - Store size – for new build these are typically in the range of 1500-2200 sq m GFA.
- 1.10 Food discount store operators require locations that are able to provide extensive surface level car parking allowing customers to take purchases in their trolleys direct to cars. There are exceptions to this – for example Lidl would provide stores with only limited parking in areas with very high local population densities and where land values are very high and the identification of preferred sites is very difficult. These exceptions are located in the centre/inner-city areas of large cities and Bury St Edmunds would not meet the requirements for these exceptional store types.

Option B – Mid-Sized Supermarket

- 1.11 There are a limited number of operators that are actively developing and occupying general supermarkets of the size proposed. In particular these include the Co-op and M&S Foodhall. Tesco has operated these units for many years but, at the present time, have announced a rebranding of their “Metro” format (either to “Express” or “Superstore” brands) although there is no indication that this rebranding will have any impact on the size of the stores operated by Tesco.
- 1.12 In a supermarket of ca. 1800 sq m GFA these operators would provide a range of goods suited to a mix of both the main food shop (i.e. predominantly trolley based) and also top-up shopping (in this location this would serve both nearby employees in the employment area and residents). Because of the importance of trolley based shopping these stores require direct access to surface level car parking for customers.
- 1.13 An M&S Foodhall provides a unique retail offer in UK retailing in that it provides a standard supermarket format but specialises in M&S own-branded goods aimed at the mid-upper grocery market. The format has proved very successful to the extent that M&S has increasingly developed standalone foodstores (previously branded as “Simply Food”) to complement foodhalls in M&S general merchandising stores. The characteristics of the “foodhall” format include:
- A minimal non-food offering.

- A location that is either separate from any other M&S store or in a location that is within the catchment area of a larger M&S general merchandise store (such as a town like Bury St Edmunds), in these situations the Foodhall would complement the general merchandising store. However, not all M&S Foodhall stores are within the catchments of larger stores as some are located in towns where there is no prior M&S representation.
- The stores retail ca. 5000 food lines 98% of which are M&S own-brand lines.

Option C: Non-Food Discounter

- 1.14 There are numerous general discounter operators in the UK markets and include: B&M; Home Bargains (TJ Morris); The Range; Poundland, Poundstretcher; Original Factory Shop and Wilko. Typically, these retail a broad range of goods including furniture, garden equipment/plants, general household goods, stationery and convenience goods. Up to about one third of space can be for the retail of bulky goods and also convenience goods although proportions vary according to operator. Where operators seek to retail a proportion of bulky goods (e.g. B&M, Home Bargains, the Range) direct access to surface level parking is critical for store viability.

Primary Catchment Area

- 1.15 The St Edmundsbury Retail and Leisure Study (Carter Jonas, 2016) ("SERLS") provides information from a household survey undertaken that can be used to identify the appropriate catchment areas for the three potential options identified for the RIA:

- For the convenience goods-led options, i.e. Options A & B, Appendix 5 Table 2 identifies the expenditure flows from the SERLS study Zones to major convenience foodstores within Bury St Edmunds in 2016.
- For the comparison-goods led option (Option C) Appendix 6 Table 2 provides similar information for all comparison goods expenditure in 2016. Given the range of goods that are sold in non-food discounters it is considered that the analysis of *all* comparison goods would provide the best indication of the potential catchment area for this option.

Options A & B PCA

- 1.16 Table 1.1A sets out an extract of the information from the SERLS App 5 Table 2. Table 1.1B re-expresses this data in terms of the proportion of trade from each study Zone for stores and centres within Bury St Edmunds. This allows an identification of the relatively importance of different study zones in terms of their contribution of trade to the existing retail locations within Bury St Edmunds and, from this, the primary catchment area for these locations.

- 1.17 Table 1.1B shows that for each of the general locations of foodstores/floorspace for convenience goods within Bury St Edmunds (BSE) the primary catchment area served by this floorspace comprises the study zones 1, 2 and 3 – these three zones account for 85-90% of the turnover of these stores/locations.

- 1.18 The only potential variation from this is the Aldi store that has only 6% of trade draw from Zone 3. Given that the store is located on the west side of Bury St Edmunds and that Zone 3 is also located to the west of BSE this would seem to be anomalous and may reflect sample error associated with relatively small sample sizes used in the household survey for the SERLS.

Table 1.1A: Expenditure Flows to Convenience Foodstores/Locations in Bury St Edmunds (2016)

Expenditure Flows (Net SFT) SERLS Appendix 5 Table 2 2016

Zone	1	2	3	4	5	6	7	8	9	10	11	TOTAL
Town Centre Convenience	£17.7m	£5.3m	£7.8m	£1.7m	£1.3m	£1.9m	£0.1m	£0.4m	£0.2m	£0.0m	£0.3m	£36.7m
BSE West (Aldi + Asda)	<i>Aldi</i> £8.0m	<i>£9.3m</i>	<i>£1.6m</i>		<i>£0.7m</i>	<i>£1.0m</i>		<i>£0.1m</i>	<i>£1.9m</i>	<i>£4.2m</i>		<i>£26.8m</i>
	<i>Asda</i> £16.8m	<i>£7.0m</i>	<i>£7.9m</i>									<i>£31.7m</i>
	£24.8m	£16.3m	£9.5m	£0.0m	£0.7m	£1.0m	£0.0m	£0.1m	£1.9m	£4.2m	£0.0m	£58.5m
BSE North (Tesco, Co-op)	<i>Co-op</i> £1.0m	<i>£1.1m</i>	<i>£1.0m</i>									<i>£3.1m</i>
	<i>Tesco</i> £12.7m	<i>£14.0m</i>	<i>£7.6m</i>	<i>£0.5m</i>	<i>£1.1m</i>				<i>£0.7m</i>	<i>£1.4m</i>		<i>£38.0m</i>
	£13.7m	£15.1m	£8.6m	£0.5m	£1.1m	£0.0m	£0.0m	£0.0m	£0.7m	£1.4m	£0.0m	£41.1m
BSE East (Sainsbury)	£19.6m	£10.4m	£5.3m	£0.7m	£0.4m	£0.8m	£0.1m		£1.0m	£0.3m	£0.1m	£38.7m
Remainder BSE	£0.4m	£1.4m	£0.7m			£0.2m						£2.7m
Total BSE	£76.2m	£48.5m	£31.9m	£2.9m	£3.5m	£3.9m	£0.2m	£0.5m	£3.8m	£5.9m	£0.4m	£177.7m

Table 1.1B: Trade Draw to Convenience Foodstores/Locations in Bury St Edmunds (2016)

Trade Draw Analysis (Catchment Areas)

Zone	1	2	3	4	5	6	7	8	9	10	11	TOTAL
Town Centre Convenience	48%	14%	21%	5%	4%	5%	0%	1%	1%	0%	1%	100%
BSE West (Aldi + Asda)	<i>Aldi</i> 30%	<i>35%</i>	<i>6%</i>	<i>0%</i>	<i>3%</i>	<i>4%</i>	<i>0%</i>	<i>0%</i>	<i>7%</i>	<i>16%</i>	<i>0%</i>	<i>100%</i>
	<i>Asda</i> 53%	<i>22%</i>	<i>25%</i>	<i>0%</i>	<i>0%</i>	<i>100%</i>						
	42%	28%	16%	0%	1%	2%	0%	0%	3%	7%	0%	100%
BSE North (Tesco, Co-op)	<i>Co-op</i> 32%	<i>35%</i>	<i>32%</i>	<i>0%</i>	<i>0%</i>	<i>100%</i>						
	<i>Tesco</i> 33%	<i>37%</i>	<i>20%</i>	<i>1%</i>	<i>3%</i>	<i>0%</i>	<i>0%</i>	<i>0%</i>	<i>2%</i>	<i>4%</i>	<i>0%</i>	<i>100%</i>
	33%	37%	21%	1%	3%	0%	0%	0%	2%	3%	0%	100%
BSE East (Sainsbury)	51%	27%	14%	2%	1%	2%	0%	0%	3%	1%	0%	100%
Remainder BSE	15%	52%	26%	0%	0%	7%	0%	0%	0%	0%	0%	100%
Total BSE	43%	27%	18%	2%	2%	2%	0%	0%	2%	3%	0%	100%

Table 1.2A: Expenditure Flows to Comparison Floorspace Locations in Bury St Edmunds (2016)

Expenditure Flows (Net SFT) SERLS Appendix 6 Table 2 2016

Zone	1	2	3	4	5	6	7	8	9	10	11	TOTAL
Town Centre Comparison	£76.8m	£83.9m	£37.1m	£8.9m	£37.7m	£16.0m	£1.2m	£9.0m	£19.1m	£56.0m	£4.9m	£350.64m
St Edmundsbury RPBSE West (£5.1m	£3.4m	£2.1m	£0.2m	£0.3m	£0.4m	£0.1m	£0.0m	£0.0m	£0.5m	£0.0m	£12.08m
Bartons Retail Park	£0.4m	£0.2m	£0.3m	£0.0m	£0.0m	£0.0m	£0.0m	£0.0m	£0.0m	£0.0m	£0.0m	£0.94m
Robert Bobby Way RP	£0.2m	£0.3m	£0.4m	£0.0m	£0.5m	£0.0m	£0.0m	£0.0m	£0.8m	£0.0m	£0.3m	£2.44m
Remainder BSE	£19.4m	£18.4m	£7.9m	£1.8m	£1.4m	£2.4m	£0.5m	£1.0m	£1.5m	£5.0m	£0.3m	£59.47m
Total BSE	£101.9m	£106.2m	£47.7m	£10.9m	£39.9m	£18.8m	£1.7m	£10.0m	£21.5m	£61.5m	£5.4m	£425.6m

Table 1.2B: Trade Draw to Comparison Floorspace Locations in Bury St Edmunds (2016)

Trade Draw Analysis (Catchment Areas)

Zone	1	2	3	4	5	6	7	8	9	10	11	TOTAL
Town Centre Comparison	22%	24%	11%	3%	11%	5%	0%	3%	5%	16%	1%	100%
St Edmundsbury RP	42%	28%	18%	1%	2%	3%	1%	0%	0%	4%	0%	100%
Bartons Retail Park	43%	24%	30%	0%	0%	0%	0%	0%	0%	3%	0%	100%
Robert Bobby Way RP	8%	12%	15%	0%	21%	0%	0%	0%	34%	0%	10%	100%
Remainder BSE	33%	31%	13%	3%	2%	4%	1%	2%	3%	8%	0%	100%
Total BSE	24%	25%	11%	3%	9%	4%	0%	2%	5%	14%	1%	100%

1.19 It is reasonable to assume that both Options A and B would have a primary catchment area comparable to those identified for existing supermarkets/floorspace in the town. The conclusion from this is that the primary catchment area for both Options A and B would be Zones 1 (Bury St Edmunds), 2 (Rural East) and 3 (Rural Central).

Option C PCA

1.20 Tables 1.2A and 1.2B present a similar analysis using the information on all comparable goods expenditure from the household survey.

1.21 Examination of Table 1.2B indicates that the primary catchment area for comparison goods is less clear cut than for convenience goods and is, potentially, wider. This is not surprising given that BSE City Centre is an important comparison goods destination.

1.22 However, some caution is needed in interpreting this information. It can be seen that the biggest disparity appears to relate to Robert Boby RP. The SERLS survey only identified very low expenditure flows to this retail park – in fact only £2.44m expenditure flows. One difficulty with the SERLS, which is referred to in Section 2 below, is that the study failed to corroborate the survey data with other indicators of turnover, in particular with floorspace. In this case the small number of positive responses identifying expenditure within the RB retail park (which is, in fact, wholly located within the defined town centre) will mean that the results are subject to sampling error. It is, of course, very unlikely that this location would actually draw one third of its trade from Zone 9 when this zone only contributes a small amount of trade to the remainder of the town centre. Similar comment can be made regarding Zone 11. Therefore, it is concluded that, as far as the proposed development at Easlea Road is concerned Zones 9 & 11 should be disregarded.

1.23 Zone 10 is, however more debateable. This Zone comprises Ely West and includes Mildenhall and it is quite likely that the Mildenhall area does make a significant contribution to the comparison turnover of the City Centre. However, given that the application site is located almost adjacent to the St Edmundsbury Retail Park, that the proposed Option C would share many of the same characteristics of stores in this retail park, and its location on the east side of BSE, it is considered that it would be inappropriate to include Zone 10 within the primary catchment area for Option C.

1.24 As a result of this analysis, it is concluded that the primary catchment area for Option C would, in fact, be the same as for Options A & B, i.e. would comprise the SERLS Zones, 1, 2 and 3 only.

1.25 Figure 1.3 shows the extent of this primary catchment area for all three Options identified for the retail use of the unit.

Figure 1.3: Primary Catchment Area – Options A, B and C

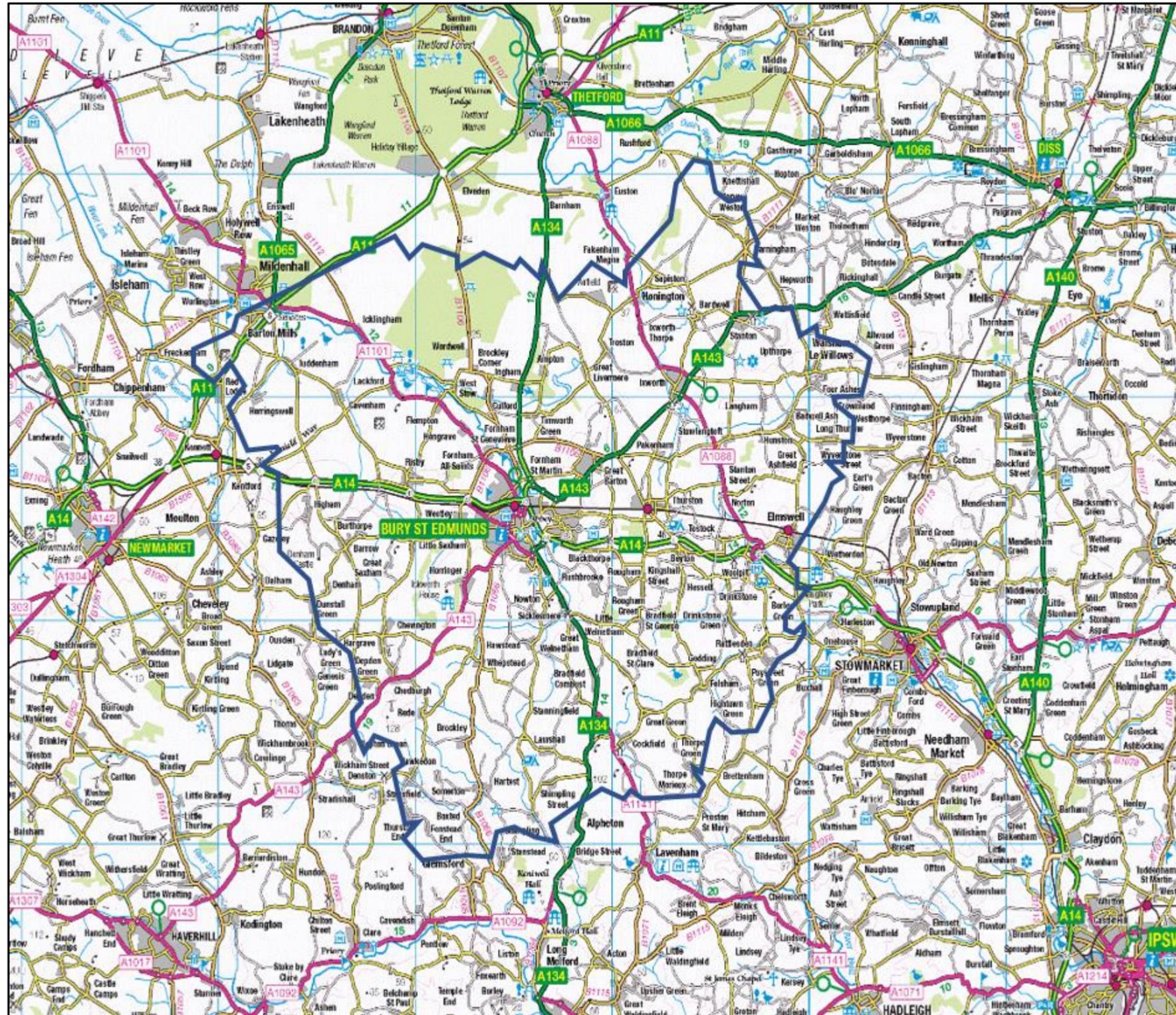


Figure 1.3: Primary Catchment Area
– Options A, B, C

Primary Catchment Area Boundary



Proposed Retail Location



2 Retail Impact Assessment

Introduction

- 2.1 This Section considers the quantitative retail impact of the proposed development on existing retail floorspace. Section 3 considers this assessment in the context of the vitality and viability of Bury St Edmunds (and other retail locations) centres affected to assess the overall significance of the retail impacts arising.
- 2.2 The following information sources have been used for the quantitative assessments presented in these Sections:
- Surveys of retail floorspace, including all centres, within the primary catchment area, undertaken in June 2021. The surveys have been based on the Goad classification of retail and retail service units. The results of these surveys are presented in Appendix B. The survey included identification of convenience and comparison goods sales and estimates of net retail floor area within all major supermarkets and superstores within the catchment area.
 - Charles Goad Stirling Centre Survey Jan 2021 (Appendix C)
 - Base population and future population growth from the SERLS 2016 App 4 Table 1.
 - The base (2016) available expenditure per capita for both convenience and comparison goods is from SERLS App 4 Tables 2 and 4. This provides data for 2016. However, since 2016, expenditure growth and forecasts of Special Forms of Trading (SFT) have changed radically. Therefore, expenditure growth from the 2016 base, including deductions for SFT have been from Precisely (formerly Pitney Bowes/MapInfo) Retail Expenditure Guide Sept 2020. This takes into account anticipated effects arising during and after the Covid-19 pandemic on the role of SFT.
 - Floorspace is not provided in the SERLS. Floorspace data in the RIA is taken from (i) Goad floorspace report for 2021 adjusted to reflect June 2021 survey findings and, for major units, including all supermarkets etc, floorspace has been obtained from the Government Valuation Roll and planning application information.
 - Turnover is taken from expenditure data set out in the SERLS subject to adjustments described below – for these adjustments reference is made to average sales densities identified in 2020 Retail Rankings.
- 2.3 The RIA follows the Government Town Centres and Retail Guidance (Sept 2020) and, in particular, advice relevant to the Impact Test. It also follows the recommendations on RIA practice set out in research undertaken for the Scottish Government on Town Centres and Retailing Methodologies Report (2008).
- 2.4 The RIA considers each of the following:
- The primary catchment area for the proposed development – existing and future population and available expenditure. This has been identified in Section 1 above.

- Existing retail floorspace and turnover for the base year (2021) and design year (2023). The current application is for a change of use and, on this basis only limited changes would be required to implement the consent. On this basis the earliest reasonable date for the first full year of trading for the proposed development would be 2023.
- Turnover of the proposed development, trade draw from the primary catchment area and trade diversion from existing retail floorspace.
- Calculation of retail impact – this includes a range of different measures of impact.
- Significance of retail impact (Section 3) considers indicators of vitality and viability as well as quantitative impact figures.

2.5 All monetary values are expressed in 2014 prices consistent with the SERLS.

2.6 In general, the approach adopted is consistent with identifying “worst-case” impacts. This reflects each of the following:

- All trade to the proposed development is assumed to be drawn from the PCA and, in addition, all trade diversion, is identified to be from centres within the PCA or, more specifically, within BSE. This results in the identification of potentially *higher* impacts on BSE centres.
- The RIA considers the full range of impacts associated with three potential scenarios and identifies the maximum potential impacts associated with these.
- Full sensitivity tests are used to identify potential impacts arising with different assumptions in the RIA.
- For reasons set out below, the RIA assumes that the comparison turnover within BSE City Centre is considerably lower than identified in the SERLS. The result of this is that the impact on the City Centre is identified to be significantly *higher* than would be the case if SERLS figures were adopted.

Primary Catchment Area and Population

2.7 The extent of the primary catchment area was identified in Figure 1.3. Table 2.1 sets out the population and available expenditure for this area.

2.8 The population of the PCA is identified to be 96,583 in 2021 and this will increase slightly to the test year in 2023. Using the 2016 base data from the SERLS combined with up to date expenditure growth forecasts from Precisely the available expenditure for convenience goods was identified to decline marginally between 2016 and 2021 despite the growth in population. The primary factor for this is the higher levels of SFT between 2016 and 2021 combined with slow expenditure growth.

2.9 Available expenditure for convenience goods (net of SFT) in the PCA therefore declined from £200.35m in 2016 to £198.72m in 2021 but will grow to £202.99m in 2023. Available expenditure for comparison goods has grown, but at rates much lower than forecast in the SERLS – in 2016 this was £294.43m (net SFT), increasing to £297.10m in 2021 and £314.82m in 2023.

TABLE 2.1: PRIMARY CATCHMENT AREA - RESIDENT POPULATION AND EXPENDITURE

2014 Prices

YEAR		POPULATION	CONVENIENCE AVAILABLE EXPENDITURE		COMPARISON AVAILABLE EXPENDITURE	
			Net SFT		Net SFT	
			Rate Per Head	Total £m	Rate Per Head	Total £m
2016	Zone 1 Bury St Edmunds	42,795	£1,962	£83.96m	£2,721	£116.45m
	Zone 2 Rural East	36,217	£2,226	£80.62m	£3,387	£122.67m
	Zone 3 Rural Central	15,080	£2,372	£35.77m	£3,668	£55.31m
	Total	94,092		£200.35m		£294.43m
2021	Zone 1 Bury St Edmunds	43,875	£1,896	£83.17m	£2,674	£117.34m
	Zone 2 Rural East	37,184	£2,151	£79.97m	£3,329	£123.79m
	Zone 3 Rural Central	15,524	£2,292	£35.58m	£3,605	£55.97m
	Total	96,583		£198.72m		£297.10m
2023	Zone 1 Bury St Edmunds	44,264	£1,917	£84.85m	£2,806	£124.19m
	Zone 2 Rural East	37,583	£2,175	£81.74m	£3,492	£131.25m
	Zone 3 Rural Central	15,702	£2,318	£36.39m	£3,782	£59.38m
	Total	97,549		£202.99m		£314.82m

Notes							
1	Population from SRS App 4 Table 1						
2	Population growth - estimate of 2023 Population						
		Zone 1	Zone 2	Zone 3			
	2021	43875	37184	15524			
	2023	44264	37583	15702			
	2026	44855	38190	15972			
3	Available Expenditure for 2016 from SRS App 4 Tables 2 and 4						
4	Expenditure growth from Table 3.1 Precisely Regional Expenditure Guide 2020/21						
5	Special forms of trading from Tables 3.4 and 3.5 Precisely REG 2020/21						
		Zone 1		Zone 2		Zone 3	
		Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
	2016 base (gross SFT)	£2,025	£3,427	£2,297	£4,266	£2,448	£4,620
	2016 base (net SFT)	£1,962	£2,721	£2,226	£3,387	£2,372	£3,668
	2021 (gross SFT)	£2,019	£3,794	£2,290	£4,722	£2,441	£5,114
	2021 (net SFT)	£1,896	£2,674	£2,151	£3,329	£2,292	£3,605
	2023 (gross SFT)	£2,046	£4,156	£2,321	£5,174	£2,473	£5,603
	2023 (net SFT)	£1,917	£2,806	£2,175	£3,492	£2,318	£3,782

Existing Floorspace and Turnover in the PCA

Floorspace

- 2.10 Only limited information on floorspace is provided in the SERLS – that which is provided mainly relates to the size of superstores within Bury St Edmunds. Floorspace estimates within the City Centre have therefore been based on the estimates identified in the Jan 2021 Goad Report (Appendix B) adjusted to reflect the changes in retail units between January and June 2021 identified from the survey undertaken by HPL in June. Sizes of major units have been sourced direct from the Valuation Roll (<https://www.tax.service.gov.uk/business-rates-find/search>) and, for the principal retail parks, from the marketing particulars provided by agents. Superstore/supermarket floorspace is provided from SERLS (p39) and additional information has been provided from planning applications for recent developments.

Turnover

Convenience Goods

- 2.11 SERLS App 5 Table 2-6 and App 6 Tables 2-6 identifies the total expenditure flows into the principal retail locations within Bury St Edmunds for different years for convenience and comparison goods respectively. In this way Tables Apps 5&6 Table 3, combine the information on percentage of retail spend by different goods type with available expenditure from the study zones to identify the quantum of expenditure directed to different locations within BSE in 2021. For example, App 2 Table 3 identifies the total expenditure for convenience goods directed into the City Centre to total £37.7m which must, therefore, be the same as the turnover for convenience goods in shops in the City Centre.
- 2.12 However, the rate of expenditure growth for convenience goods has been slightly lower than forecast in the SERLS – expenditure in 2021 is, using the latest Precisely forecasts, 3.5% lower than estimated in the study. As a result, the turnover of all convenience floorspace has been reduced by 3.5% to reflect this lower growth. No further changes have been made to the estimate of turnover for convenience goods – however, it is considered that caution is needed particularly in relation to the Aldi sales density identified from the SERLS. This identifies Aldi's turnover as £26.6m (or adjusted, £25.7m) which produces a sales density of is £27,698 psm (after the 3.5% deduction). Although the store appears to be busy and, probably trading above the national average for the company, this figure is well over double the latest Retail Rankings average for the company (which is, itself expressed in, 2018/19 prices) and is almost certainly a significant overestimate. In contrast the turnover identified for other supermarkets, especially the Co-op may be slightly underestimated.

Comparison Goods

- 2.13 The same adjustment for lower expenditure growth between 2016 and 2021 has been made for comparison goods – this means that, based on expenditure generated from residents, expenditure flow figures (and therefore the implied turnover of locations) need to be deflated by 12.10%. The implication of this is that the comparison goods turnover of the City Centre should be revised down from £410.5m (App 6 Table 3 – BSE + RBW Retail Park) to £360.8m.
- 2.14 However, it is HPL's view that the failure of the BSERLS to corroborate implied turnover with floorspace, and therefore, implied sales densities, has resulted in this table substantially over-estimating the comparison

turnover of the City Centre in particular. The sources identified above provide a reasonably robust estimate of actual comparison goods floorspace within the City Centre at 23,990 sq m NFA (36,255 sq m GFA). Using App 6 Table 3 figures (adjusted to reflect slower expenditure growth) this implies an average sales density of over £15,000 psm. This is an extremely high figure and, through an examination of Retail Rankings and studies elsewhere, this is almost certainly close to double the actual sales density being achieved within the City Centre. It is clear therefore, that due to the survey design, sample size and failure to corroborate the findings, only very limited reliance can be placed on the BSERLS implied turnover for the City Centre. Nonetheless, the survey does indicate that there is a high level of expenditure directed to the City Centre which is, in all likelihood, trading above national average levels for the floorspace present. To reflect this a revised estimate has been included within Table 2.2 which identifies the City Centre comparison turnover to be close to £213m pa. This revised figure takes into account trade diversion to the new retail units at Western Way which commenced trading after the 2016 study.

- 2.15 ***The important point from this is that, through adopting a significantly lower turnover in the City Centre the RIA will result in significantly higher estimated retail impacts than would be the case if it relied on the SERLS report.***

Turnover Growth

- 2.16 Table 2.2 identifies estimates of turnover in the test year by changing turnover in line with changes in available expenditure within the PCA (i.e. from Table 2.1). This approach is directly comparable to that used in the SERLS but uses the latest available expenditure growth forecasts from Precisely.

Effect of Recent Developments

- 2.17 Since the 2016 SERLS new retail floorspace has been provided at Western Way (The Range and B&M) and planning permission has also been granted to permit an additional 999 sq m GFA at Glasswells furniture store. These units have been included within Table 2.2 and the impact of these taken into account in the estimate of turnover within the City Centre.

TABLE 2.2: FLOORSPACE AND TURNOVER IN 2021 AND 2023
2014 Prices

	No.	Convenience Goods				Comparison Goods				All Goods			Turnover in 2023		
		GFA	NFA	Per Sq M	Total £m	GFA	NFA	Per Sq M	Total £m	GFA	NFA	Turnover 2021 Total £m	Convenience	Comparison	Turnover 2023 Total £m
BURY ST EDMUNDS CITY CENTRE															
The Arc															
Convenience	1	91	59	£8,157	£0.48m					91	59	£0.48m	£0.49m		£0.49m
Comparison	25					11140	7241	£12,000	£86.89m	11140	7241	£86.89m		£92.07m	£92.07m
Retail Services	1									91					
Leisure Services	7									1610					
F&B Services	0									0					
Vacant	2									7937					
TOTAL	36	91	59	£0.48m		11140	7241		£86.89m	20869	7300	£87.37m	£0.49m	£92.07m	£92.57m
Robert Boby Retail Park															
Convenience Waitrose	1	3163	1898	£11,085	£21.04m	558	335	£7,206	£2.41m	3721	2233	£23.45m	£21.49m	£2.56m	£24.05m
Comparison TK Maxx	1					1858	1486	£4,500	£6.69m	1858	1486	£6.69m		£7.09m	£7.09m
	1					796	691	£3,500	£2.42m	796	691	£2.42m		£2.56m	£2.56m
Vacant	2									1208					
TOTAL	5	3163	1898	£21.04m		3212	2512		£11.52m	7583	4410	£32.56m	£21.49m	£12.21m	£33.70m
Remainder of City Centre															
Convenience	27	3319	1991	£7,464	£14.86m					3319	1991	£14.86m	£15.18m		£15.18m
Comparison	128					21903	14237	£8,040	£114.46m	21903	14237	£114.46m		£121.29m	£121.29m
Retail Services	61									5269					
Leisure Services	91									20196					
F&B Services	51									8335					
Vacant	50									6249					
TOTAL	408	3319	1991	£14.86m		21903	14237		£114.46m	65270	16228	£129.33m	£15.18m	£121.29m	£136.47m
TOTAL CITY CENTRE															
Convenience	29	6572	3948	£9,215	£36.38m					6572	3948	£36.38m	£37.16m		£37.16m
Comparison	155					36255	23990	£8,874	£212.88	36255	23990	£212.88m		£225.57m	£225.57m
Retail Services	62									5360					
Leisure Services	98									21806					
F&B Services	51									8335					
Vacant	54									15394					
TOTAL	449	6572	3948	£36.38m		36255	23990		£212.88m	93722	27938	£249.26m	£37.16m	£225.57m	£262.74m
St Edmundsbury Retail Park															
Convenience															
All Comparison	10	335	268	£7,238	£1.94m	12411	9929	£3,000	£29.79m	12746	10197	£31.73m	£1.98m	£31.56m	£33.54m
Vacant	1									139					
TOTAL	11	335	268	£1.94m		12411	9929		£29.79m	12885	10197	£31.73m	£1.98m	£31.56m	£33.54m
Bartons Retail Park															
Convenience Farmfoods	1	498	374	£5,308	£1.98m					498	374	£1.98m	£2.02m		£2.02m
Comparison	7					2173	1412	£1,500	£2.12m	2173	1412	£2.12m		£2.25m	£2.25m
Leisure Services	2									250					
TOTAL	10	498	374	£1.98m		2173	1412		£2.12m	2921	1786	£4.10m	£2.02m	£2.25m	£4.27m
Other Major Foodstores															
Aldi	1	1426	927	£27,698	£25.67m	475	309	£18,004	£5.56m	1901	1236	£31.23m	£26.22m	£5.89m	£32.11m
Asda	1	5530	3042	£13,414	£40.80m	976	537	£8,719	£4.68m	6506	3578	£45.48m	£41.68m	£4.96m	£46.64m
Co-op	1	1646	1070	£2,976	£3.18m	291	189	£1,934	£0.37m	1937	1259	£3.55m	£3.25m	£0.39m	£3.64m
Sainsbury's	1	5333	2933	£13,094	£38.41m	941	518	£8,511	£4.41m	6274	3451	£42.81m	£39.23m	£4.67m	£43.90m
Tesco	1	5423	3254	£11,596	£37.73m	957	574	£7,537	£4.33m	6380	3828	£42.06m	£38.54m	£4.59m	£43.13m
TOTAL	5	19358	11225	£145.79m		3640	2126		£19.34m	22998	13352	£165.13m	£148.92m	£20.49m	£169.42m
Other Major Non-Foodstores															
Matalan	1					2882	2162	£1,796	£3.88m	2882	2162	£3.88m		£4.11m	£4.11m
The Range	1					1693	1166	£3,000	£3.50m	1693	1166	£3.50m		£3.71m	£3.71m
B&M	1	409	327	£4,723	£1.54m	1634	1308	£3,485	£4.56m	2043	1634	£6.10m	£1.58m	£4.83m	£6.41m
Glasswells	1					10856	7580	£868	£6.58m	10856	7580	£6.58m		£6.97m	£6.97m
House of Harmony	1					778	685	£1,500	£1.03m	778	685	£1.03m		£1.09m	£1.09m
DJ Evans	1					1368	482	£1,500	£0.72m	1368	482	£0.72m		£0.77m	£0.77m
B&Q	1					4690	3699	£1,534	£5.67m	4690	3699	£5.67m		£6.01m	£6.01m
Miscellaneous Others	15+								£42.76m			£42.76m		£45.31m	£45.31m
Total	22+	409	327	£1.54m		23901	17081		£68.70m	24310	17408	£70.24m	£1.58m	£72.80m	£74.37m
PRIMARY CATCHMENT AREA TOTAL	497+	27172	16142	£187.64m		78380	54539		£332.82m	156836	70681	£520.46m	£191.67m	£352.67m	£544.34m

Notes:
1. Retail units identified from survey June 2021 with floorspace correlated to Goad Jan 2021 Survey
2. Floorspace estimates from (i) Goad Jan 2021 survey; (ii) Valuation Office records for premises (iii) St Edmundsbury Retail Study (SERS) for major foodstores only.
3. Convenience turnover from SERS (adjusted to reduced expenditure growth 2016-21 - see comments in text) but comparison turnover from reference to both SERS and 2020 Retail Rankings
4. Turnover in 2023 increased in line with available expenditure growth Table 2.1.

Proposed Retail Development

Development Options

2.18 As noted in Section 1 the precise occupier for the retail unit is not fixed and the application is seeking planning permission for unrestricted retail use. In order to assess the potential retail impact of this use three development scenarios have been tested to reflect the potential types of retail occupier that have expressed interest in occupying the unit. Between them, these three scenarios identify the full range of potential retail impacts that could arise from the proposed development.

- Option A – Operation as a discount foodstore
- Option B – Operation as a general mid-sized supermarket
- Option C – Operation as a non-food discounter.

2.19 Other potential retail operators could be accommodated within the unit, in particular for using the unit as a foodstore for frozen goods or for bulky comparison goods. However, these possibilities would result in lower retail turnover and reduced potential impacts on Bury St Edmunds town centre. Therefore, these additional possibilities are covered through the use of the three development scenarios tested in this RIA

2.20 Table 2.3 sets out a summary schedule of the floorspace for these options.

TABLE 2.3: DEVELOPMENT SCENARIOS

Option		Scenario A <i>Food Discounter</i> Sq M	Scenario B <i>Mid-Size Supermarket</i> Sq M	Scenario C <i>Non-Food Discounter</i> Sq M
Convenience	Net	992	700	313
	Gross	1417	1167	417
General Comparison	Net	175	300	688
	Gross	250	500	917
Bulky Goods	Net	0	0	250
	Gross	0	0	333
Total	Net	1167	1000	1250
	Gross	1667	1667	1667
Scenario A:		Based on attributes of Aldi and Lidl Foodstores		
Scenario B:		Based on attributes of Co-op, M&S Foodhall and Tesco "Metro" formats (up to 2021)		
Scenario C:		Based on attributes of B&M; Home Bargains; Poundstretcher; Poundland; Wilko and The Range		

2.21 Tables 2.4A – 2.4C set out the turnover assumptions identified for each of the three scenarios. These demonstrate how the convenience and comparison goods turnover would vary. The highest convenience goods turnover is identified in Scenario A and the highest comparison goods turnover in Scenario C.

TABLE 2.4A: PROPOSED DEVELOPMENT - SCENARIO A - FOOD DISCOUNTER

2014 Prices

	GFA	NFA	Turnover Rate	Total Turnover 2023
Total Floorspace & Turnover				
Convenience	1417	992	£11,219	£11.13m
General Comparison	250	175	£11,219	£1.96m
Bulky Goods	0	0		£0.00m
Total	1667	1167		£13.09m
	1667	1167		£13.09m

Notes:

Turnover assumptions: £psm Average of stores from Retail Rankings 2020
Unit: Food Discounter 11219 Aldi; Lidl

TABLE 2.4B: PROPOSED DEVELOPMENT - SCENARIO B - GENERAL SUPERMARKET

2014 Prices

	GFA	NFA	Turnover Rate	Total Turnover 2023
Total Floorspace & Turnover				
Convenience	1167	700	£11,816	£8.27m
General Comparison	500	300	£7,680	£2.30m
Bulky Goods	0	0		£0.00m
Total	1667	1000	£10,575	£10.58m
	1667	1000		£10.58m

Notes:

Turnover assumptions: £psm Average of stores from Retail Rankings 2020
Unit: General Mid-Sized Superma 10575 Co-op, M&S Foodhall and Tesco

TABLE 2.4C: PROPOSED DEVELOPMENT - SCENARIO C - NON-FOOD DISCOUNTER

2014 Prices

	GFA	NFA	Turnover Rate	Total Turnover 2023
Total Floorspace & Turnover				
Convenience	417	313	£4,213	£1.32m
General Comparison	917	688	£4,213	£2.90m
Bulky Goods	333	250	£4,213	£1.05m
Total	1667	1250		£5.27m
	1667	1250		£5.27m

Notes:

Turnover assumptions: £psm Average of stores from Retail Rankings 2020
Unit: Non-Food Discounter 4213 B&M; Home Bargains; Poundland ; Wilko (Poundstretcher and The Range not available)

Scenario A – Diversion Assumptions

- 2.22 In this RIA, trade *diversion* is the amount of turnover of the proposed development that is diverted from competing retail locations. Competing retail locations include shops/centres both within the PCA and beyond, however, in this case the high level of self-containment for both convenience and comparison goods within the PCA and the adoption of an approach that identified the potential worst-case impacts has resulted in the RIA assuming that all turnover of the proposed development would be diverted from retail locations within Bury St Edmunds (including both the City Centre and elsewhere).
- 2.23 The term trade *draw* is used when describing the distribution of the origin of shoppers attracted to the proposed development. As noted above this RIA has assumed that all trade *draw* will originate from residents within the PCA.
- 2.24 Trade diversion to the proposed retail development (Scenario A) is set out in Table 2.5A below. The principal factors that have been taken into account in assessing trade diversion are:
- Similarity of goods traded. For convenience goods the principal competing locations would be existing supermarkets and superstores serving main food and top-up shopping requirements and, in particular for Scenario A, the existing Aldi foodstore. For general comparison goods the primary competing locations are the stores in the City Centre and, to a more limited degree, superstores and supermarkets. In Scenario C trade diverted from other general discount stores will be important. For bulky goods (relevant to Scenario C only) most trade is assumed to be diverted from St Edmundsbury RP.
 - Level of the turnover of existing retail centres/locations.
 - Similarity of catchment areas of existing retail centres/shops and the proposed store reflected in the relative distance between the proposed floorspace and competing locations.
 - Known patterns of expenditure flows (from the household survey).
- 2.25 These factors are identified in the Table together with an indication of the relative importance of each factor for assessing trade diversion.
- 2.26 Trade diversion percentages are *not* a measure of retail impact. They simply identify the proportion of *the turnover of the proposed development* diverted from different competing retail locations – since the RIA assumes that *all* trade of the proposed development is diverted from other locations the total sum of trade diversion must equal 100%. The effect that this has on percentage retail impacts requires a comparison between the quantum of trade diversion and the existing/projected turnover of the existing/competing retail locations. This is addressed in the next stage of the retail impact assessment.
- 2.27 Table 2.5A shows the following principal sources of trade diversion to the proposed new foodstore:
- Trade diversion from Bury St Edmunds City Centre accounts for only 16% of the development turnover for convenience goods (£1.60m) but 75% (£1.33m) of all comparison goods (all of which would be general comparison goods).

- Diversion from major foodstores in Bury St Edmunds account for over 80% (£8.16m) convenience turnover of the proposed development but only 6.5% of the comparison turnover (£0.11m).
- Diversion from St Edmundsbury RP is associated with only limited trade diversion to the proposed development – this is £0.28m (for combined convenience and comparison goods) and trade diversion from the Bartons RP is lower still.

TABLE 2.5A: DERIVATION OF TRADE DIVERSION - SCENARIO A - FOOD DISCOUNTER

2014 Prices

	Convenience Goods					Comparison Goods					Total Trade Diversion All Goods
	2023 Turnover (Conv only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2023 Turnover (Comp only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Comparison	Total Trade Diversion Comparison	
BURY ST EDMUNDS CITY CENTRE											
The Arc											
Convenience	£0.49m	1	4	0.0%	£0.00m						£0.00m
Comparison						£92.07m	2	4	23.0%	£0.41m	£0.41m
TOTAL	£0.49m			0.0%	£0.00m	£92.07m			23.0%	£0.41m	£0.41m
Robert Boby Retail Park											
Convenience	£21.49m	3	4	10.0%	£1.00m	£2.56m	1	4	0.5%	£0.01m	£1.01m
Comparison						£7.09m	2	4	1.5%	£0.03m	£0.03m
						£2.56m	1	4	0.0%	£0.00m	£0.00m
TOTAL	£21.49m			10.0%	£1.00m	£12.21m			2.0%	£0.04m	£1.04m
Remainder of City Centre											
Convenience	£15.18m	2	4	6.0%	£0.60m						£0.60m
Comparison						£121.29m	3	4	50.0%	£0.88m	£0.88m
TOTAL	£15.18m			6.0%	£0.60m	£121.29m			50.0%	£0.88m	£1.48m
TOTAL CITY CENTRE											
Convenience	£37.16m			16.0%	£1.60m						
Comparison						£225.57m			75.0%	£1.33m	
TOTAL	£37.16m			16.0%	£1.60m	£225.57m			75.0%	£1.33m	£0.00m
St Edmundsbury Retail Park											
Convenience											
All Comparison	£1.98m	2	5	1.0%	£0.10m	£31.56m	3	5	10.0%	£0.18m	£0.28m
	£1.98m			1.0%	£0.10m	£31.56m			10.0%	£0.18m	£0.28m
Bartons Retail Park											
Convenience	£2.02m	3	5	1.0%	£0.10m						£0.10m
Comparison						£2.25m	2	5	1.0%	£0.02m	£0.02m
	£2.02m			1.0%	£0.10m	£2.25m			1.0%	£0.02m	£0.12m
Other Major Foodstores											
Aldi	£26.22m	5	2	10.5%	£1.05m	£5.89m	5	2	1.5%	£0.03m	£1.08m
Asda	£41.68m	4	2	15.0%	£1.50m	£4.96m	4	2	1.0%	£0.02m	£1.52m
Co-op	£3.25m	3	2	1.0%	£0.10m	£0.39m	4	2	0.0%	£0.00m	£0.10m
Sainsbury's	£39.23m	4	5	35.0%	£3.51m	£4.67m	4	5	2.5%	£0.04m	£3.55m
Tesco	£38.54m	4	3	20.0%	£2.00m	£4.59m	4	3	1.5%	£0.03m	£2.03m
	£148.92m			81.5%	£8.16m	£20.49m			6.5%	£0.11m	
Other Major Non-Foodstores											
Matalan						£4.11m	2	5	1.0%	£0.02m	£0.02m
The Range						£3.71m	3	2	0.5%	£0.01m	£0.01m
B&M	£1.58m	2	2	0.5%	£0.05m	£4.83m	3	2	0.5%	£0.01m	£0.06m
Glasswells						£6.97m	1	2	0.0%	£0.00m	£0.00m
House of Harmony						£1.09m	1	5	0.0%	£0.00m	£0.00m
DJ Evans						£0.77m	1	4	0.0%	£0.00m	£0.00m
B&Q						£6.01m	1	4	0.5%	£0.01m	£0.01m
Miscellaneous Others						£45.31m	2	3	5.0%	£0.09m	£0.09m
Total	£1.58m			0.5%	£0.05m	£72.80m			£0.08m	£0.00m	£0.00m
PRIMARY CATCHMENT AREA TOTAL											
	£191.67m			100.0%	£10.01m	£352.67m			100.0%	£1.77m	£11.78m

Scenario A – Retail Impact of Proposed Development

2.28 The calculation of retail impact, using a range of quantitative measures, for the Scenario A is set out in Table 2.6A. The Table sets out the following information from earlier RIA tables:

- The existing (2021) turnover of retail locations (from Table 2.2).
- The forecast turnover of retail locations in 2023 (design year) from Table 2.2 (without the proposed development).
- Trade diversion from retail locations to the proposed development (from Table 2.5A).
- The forecast turnover of retail locations in 2023 with the proposed retail development trading.

2.29 The above information is provided for each of convenience goods, for comparison goods and all retail goods.

2.30 This allows the calculation of retail impact as follows:

- Columns A and B identify the turnover of retail locations for 2021 (column A) and 2023 (column B). This is from Table 2.2.
- Column C identifies the total trade diversion (as set out in Table 2.5A) and column D identifies the turnover of these locations in 2023 following the deduction of this trade diversion (i.e. col D = col B – col C).
- Column E identifies the percentage change of turnover between 2021 and 2023 *with* the proposed foodstore i.e. this takes into account the diversion of trade to the proposed development. In this case if the change in turnover as a result of increasing market size exceeds the trade diversion to the proposed development, then this will identify positive increases in turnover. If, however, the trade diversion exceeds the change in turnover then this will identify negative percentage change. This is, in effect, a **cumulative** measure of impact and places the direct impact of the proposed development in a wider context – for example a centre benefitting from turnover growth will be more able to withstand high levels of adverse impact than a centre with low growth or declining turnover.
- Column F identifies the percentage change of turnover comparing the turnover in 2023 *without* the proposed development with the situation in 2023 *with* the development. This will always identify a negative impact (or no impact at all) and shows the **direct** impact of the proposed foodstore in isolation of wider changes.
- Retail sales densities – this allows comparison between the post-impact sales densities in 2023 with the benchmark or notional average sales densities identified in the various retail capacity studies and national average rates identified the 2020 Retail Rankings. These are identified in column G.

2.31 In summary the impacts of the proposed development on the principal retail locations are as follows:

- Bury St Edmunds City Centre (including The Arc, Robert Boby RP and the remainder of the City Centre):

- *Direct impacts in 2023: Convenience goods only: -4.3%; Comparison goods only: -0.6%; All goods: -1.1%.*
- *Impacts taking into account expenditure change: Convenience goods only: -2.3%; Comparison goods: +5.3% (i.e the turnover grows despite trade diversion to the proposed development); All goods: +4.2%.*

- St Edmundsbury Retail Park:
 - *Direct impacts in 2023: Comparison goods only: -0.8%.*
 - *Impacts taking into account expenditure change: Comparison goods: +4.9%*

- The Bartons Retail Park:
 - *Direct impacts in 2023: Convenience goods only: -4.9%; Comparison goods only: -0.8%; All goods: -2.8%.*
 - *Impacts taking into account expenditure change: Convenience goods only: -2.9%; Comparison goods: +5.1%; All goods: +1.2%.*

2.32 The significance of these impacts will be assessed in Section 3.

TABLE 2.6A: CALCULATION OF RETAIL IMPACT- SCENARIO A - FOOD DISCOUNTER

2014 Prices

	A	B	C	D	E	F	G
	2021 Existing Turnover (Without Proposed Dvpt)	2023 Turnover without Proposed Development	Trade Diversion (All Goods)	2023 Turnover with Proposed Development	Turnover Change 2021 with Dvpt v 2023 without Dvpt	Turnover Change 2023 with Dvpt v 2023 without Dvpt	Residual Turnover rate £psm
BURY ST EDMUNDS CITY CENTRE							
<i>convenience goods only</i>							
<i>coomparison goods only</i>							
The Arc							
Convenience	£0.48m	£0.49m	£0.00m	£0.49m	+2.1%	+0.0%	£8,157psm
Comparison	£86.89m	£92.07m	£0.41m	£91.67m	+5.5%	-0.4%	£11,944psm
TOTAL	£87.37m	£92.57m	£0.41m	£92.16m	+5.5%	-0.4%	
Robert Bobby Retail Park							
Convenience	£23.45m	£24.05m	£1.01m	£23.04m	-1.8%	-4.2%	£10,558psm
Comparison	£6.69m	£7.09m	£0.03m	£7.06m	+5.6%	-0.4%	£4,482psm
	£2.42m	£2.56m	£0.00m	£2.56m	+6.0%	+0.0%	£3,500psm
TOTAL	£32.56m	£33.70m	£1.04m	£32.66m	+0.3%	-3.1%	
Remainder of City Centre							
Convenience	£14.86m	£15.18m	£0.60m	£14.58m	-1.9%	-4.0%	£7,162psm
Comparison	£114.46m	£121.29m	£0.88m	£120.41m	+5.2%	-0.7%	£7,978psm
TOTAL	£129.33m	£136.47m	£1.48m	£134.99m	+4.4%	-1.1%	
TOTAL CITY CENTRE							
Convenience	£36.38m	£37.16m	£1.61m	£35.55m	-2.3%	-4.3%	£8,809psm
Comparison	£212.88m	£225.57m	£1.32m	£224.26m	+5.3%	-0.6%	£8,818psm
TOTAL	£249.26m	£262.74m	£2.93m	£259.81m	+4.2%	-1.1%	
St Edmundsbury Retail Park							
Convenience	£1.94m	£1.98m	£0.00m	£1.98m	+2.1%	+0.0%	
All Comparison	£31.73m	£33.54m	£0.28m	£33.27m	+4.9%	-0.8%	£2,982psm
	£33.67m	£35.53m	£0.28m	£35.25m	+4.7%	-0.8%	
Bartons Retail Park							
Convenience	£1.98m	£2.02m	£0.10m	£1.92m	-2.9%	-4.9%	£5,039psm
Comparison	£2.12m	£2.25m	£0.02m	£2.23m	+5.1%	-0.8%	£1,487psm
	£4.10m	£4.27m	£0.12m	£4.15m	+1.2%	-2.8%	
Other Major Foodstores							
Aldi	£31.23m	£32.11m	£1.08m	£31.04m	-0.6%	-3.4%	£26,564psm
Asda	£45.48m	£46.64m	£1.52m	£45.12m	-0.8%	-3.3%	£12,920psm
Co-op	£3.55m	£3.64m	£0.10m	£3.54m	-0.3%	-2.8%	£2,882psm
Sainsbury's	£42.81m	£43.90m	£3.55m	£40.35m	-5.7%	-8.1%	£11,899psm
Tesco	£42.06m	£43.13m	£2.03m	£41.10m	-2.3%	-4.7%	£10,981psm
	£165.13m	£169.42m	£8.28m	£161.14m	-2.4%	-4.9%	
Other Major Non-Foodstores							
Matalan	£3.88m	£4.11m	£0.02m	£4.10m	+5.5%	-0.4%	£1,788psm
The Range	£3.50m	£3.71m	£0.01m	£3.70m	+5.7%	-0.2%	£2,992psm
B&M	£6.10m	£6.41m	£0.06m	£6.35m	+4.0%	-0.9%	£3,478psm
Glasswells	£6.58m	£6.97m	£0.00m	£6.97m	+6.0%	+0.0%	£1,000psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+6.0%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.77m	£0.00m	£0.77m	+6.0%	+0.0%	£1,500psm
B&Q	£5.67m	£6.01m	£0.01m	£6.00m	+5.8%	-0.1%	£1,532psm
Miscellaneous Others	£42.76m	£45.31m	£0.09m	£45.22m	+5.8%	-0.2%	
Proposed Development			£11.78m	£11.78m			
Total	£70.24m	£74.37m	£11.60m	£85.97m	+22.4%	+15.6%	
PRIMARY CATCHMENT AREA TOTAL							
	£522.40m	£546.32m	£0.00m	£546.32m	+4.6%	+0.0%	

Scenario B – Trade Diversion and Retail Impact

- 2.33 Table 2.5B sets out the trade diversion assumptions for Scenario B which assumes occupation of the unit for a general mid-sized supermarket. Table 2.6B identifies the impacts arising using the same measures set out in Table 2.6A.

TABLE 2.5B: DERIVATION OF TRADE DIVERSION - SCENARIO B - SUPERMARKET

2014 Prices

	Convenience Goods					Comparison Goods					Total Trade Diversion All Goods
	2023 Turnover (Conv only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2023 Turnover (Comp only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Comparison	Total Trade Diversion Comparison	
BURY ST EDMUNDS CITY CENTRE											
The Arc											
Convenience	£0.49m	2	4	0.0%	£0.00m						£0.00m
Comparison						£92.07m	2	4	19.0%	£0.44m	£0.44m
TOTAL	£0.49m			0.0%	£0.00m	£92.07m			19.0%	£0.44m	£0.44m
Robert Boby Retail Park											
Convenience	£21.49m	5	4	15.0%	£1.24m	£2.56m	3	4	0.0%	£0.00m	£1.24m
Comparison						£7.09m	2	4	1.0%	£0.02m	£0.02m
						£2.56m	1	4	0.0%	£0.00m	£0.00m
TOTAL	£21.49m			15.0%	£1.24m	£12.21m			1.0%	£0.02m	£1.26m
Remainder of City Centre											
Convenience	£15.18m	3	4	6.5%	£0.54m						£0.54m
Comparison						£121.29m	3	4	40.0%	£0.92m	£0.92m
TOTAL	£15.18m			6.5%	£0.54m	£121.29m			40.0%	£0.92m	£1.46m
TOTAL CITY CENTRE											
Convenience	£37.16m			21.5%	£1.78m						£1.78m
Comparison						£225.57m			60.0%	£1.38m	£1.38m
TOTAL	£37.16m			21.5%	£1.78m	£225.57m			60.0%	£1.38m	£3.16m
St Edmundsbury Retail Park											
Convenience											
All Comparison	£1.98m	2	5	0.5%	£0.04m	£31.56m	2	5	10.0%	£0.23m	£0.27m
	£1.98m			0.5%	£0.04m	£31.56m			10.0%	£0.23m	£0.27m
Bartons Retail Park											
Convenience	£2.02m	4	5	1.5%	£0.12m						£0.12m
Comparison						£2.25m	2	5	0.5%	£0.01m	£0.01m
	£2.02m			1.5%	£0.12m	£2.25m			0.5%	£0.01m	£0.14m
Other Major Foodstores											
Aldi	£26.22m	4	2	7.0%	£0.58m	£5.89m	4	2	2.5%	£0.06m	£0.64m
Asda	£41.68m	5	2	14.0%	£1.16m	£4.96m	5	2	3.0%	£0.07m	£1.23m
Co-op	£3.25m	5	2	1.0%	£0.08m	£0.39m	5	2	0.0%	£0.00m	£0.08m
Sainsbury's	£39.23m	5	5	34.0%	£2.81m	£4.67m	5	5	6.0%	£0.14m	£2.95m
Tesco	£38.54m	5	3	20.0%	£1.65m	£4.59m	5	3	4.0%	£0.09m	£1.75m
	£148.92m			76.0%	£6.29m	£20.49m			15.5%	£0.36m	
Other Major Non-Foodstores											
Matalan						£4.11m	2	5	1.0%	£0.02m	£0.02m
The Range						£3.71m	3	2	1.0%	£0.02m	£0.02m
B&M	£1.58m	3	2	0.5%	£0.04m	£4.83m	3	2	1.0%	£0.02m	£0.06m
Glasswells						£6.97m	1	2	0.5%	£0.01m	£0.01m
House of Harmony						£1.09m	1	5	0.0%	£0.00m	£0.00m
DJ Evans						£0.77m	1	4	0.0%	£0.00m	£0.00m
B&Q						£6.01m	1	4	0.5%	£0.01m	£0.01m
Miscellaneous Others						£45.31m	2	3	10.0%	£0.23m	£0.23m
Total	£1.58m			0.5%	£0.04m	£72.80m			£0.14m	£0.00m	£0.00m
PRIMARY CATCHMENT AREA TOTAL											
	£191.67m			100.0%	£8.27m	£352.67m			100.0%	£2.30m	£10.58m

TABLE 2.6B: CALCULATION OF RETAIL IMPACT- SCENARIO B - MID-SIZED SUPERMARKET

2014 Prices

	A	B	C	D	E	F	G
	2021 Existing Turnover (Without Proposed Dvpt)	2023 Turnover without Proposed Development	Trade Diversion (All Goods)	2023 Turnover with Proposed Development	Turnover Change 2021 with Dvpt v 2023 without Dvpt	Turnover Change 2023 with Dvpt v 2023 without Dvpt	Residual Turnover rate £psm
BURY ST EDMUNDS CITY CENTRE							
<i>convenience goods only</i>							
<i>comparison goods only</i>							
The Arc							
Convenience	£0.48m	£0.49m	£0.00m	£0.49m	+2.1%	+0.0%	£8,157psm
Comparison	£86.89m	£92.07m	£0.44m	£91.64m	+5.5%	-0.5%	£11,940psm
TOTAL	£87.37m	£92.57m	£0.44m	£92.13m	+5.4%	-0.5%	
Robert Boby Retail Park							
Convenience	£23.45m	£24.05m	£1.24m	£22.80m	-2.8%	-5.2%	£10,432psm
Comparison	£6.69m	£7.09m	£0.02m	£7.06m	+5.6%	-0.3%	£4,484psm
	£2.42m	£2.56m	£0.00m	£2.56m	+6.0%	+0.0%	£3,500psm
TOTAL	£32.56m	£33.70m	£1.26m	£32.43m	-0.4%	-3.8%	
Remainder of City Centre							
Convenience	£14.86m	£15.18m	£0.54m	£14.64m	-1.5%	-3.5%	£7,194psm
Comparison	£114.46m	£121.29m	£0.92m	£120.37m	+5.2%	-0.8%	£7,975psm
TOTAL	£129.33m	£136.47m	£1.46m	£135.01m	+4.4%	-1.1%	
TOTAL CITY CENTRE							
Convenience	£36.38m	£37.16m	£1.78m	£35.38m	-2.7%	-4.8%	£8,764psm
Comparison	£212.88m	£225.57m	£1.38m	£224.19m	+5.3%	-0.6%	£8,816psm
TOTAL	£249.26m	£262.74m	£3.16m	£259.57m	+4.1%	-1.2%	
St Edmundsbury Retail Park							
Convenience	£1.94m	£1.98m	£0.00m	£1.98m	+2.1%	+0.0%	
All Comparison	£31.73m	£33.54m	£0.27m	£33.27m	+4.9%	-0.8%	£2,977psm
	£33.67m	£35.53m	£0.27m	£35.25m	+4.7%	-0.8%	
Bartons Retail Park							
Convenience	£1.98m	£2.02m	£0.12m	£1.90m	-4.1%	-6.1%	£4,975psm
Comparison	£2.12m	£2.25m	£0.01m	£2.23m	+5.4%	-0.5%	£1,492psm
	£4.10m	£4.27m	£0.14m	£4.13m	+0.8%	-3.2%	
Other Major Foodstores							
Aldi	£31.23m	£32.11m	£0.64m	£31.48m	+0.8%	-2.0%	£27,073psm
Asda	£45.48m	£46.64m	£1.23m	£45.41m	-0.2%	-2.6%	£13,033psm
Co-op	£3.55m	£3.64m	£0.08m	£3.56m	+0.2%	-2.3%	£2,898psm
Sainsbury's	£42.81m	£43.90m	£2.95m	£40.95m	-4.4%	-6.7%	£12,135psm
Tesco	£42.06m	£43.13m	£1.75m	£41.38m	-1.6%	-4.1%	£11,088psm
	£165.13m	£169.42m	£6.64m	£162.77m	-1.4%	-3.9%	
Other Major Non-Foodstores							
Matalan	£3.88m	£4.11m	£0.02m	£4.09m	+5.4%	-0.6%	£1,785psm
The Range	£3.50m	£3.71m	£0.02m	£3.68m	+5.3%	-0.6%	£2,980psm
B&M	£6.10m	£6.41m	£0.06m	£6.34m	+3.9%	-1.0%	£3,467psm
Glasswells	£6.58m	£6.97m	£0.01m	£6.96m	+5.8%	-0.2%	£998psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+6.0%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.77m	£0.00m	£0.77m	+6.0%	+0.0%	£1,500psm
B&Q	£5.67m	£6.01m	£0.01m	£6.00m	+5.8%	-0.2%	£1,531psm
Miscellaneous Others	£42.76m	£45.31m	£0.23m	£45.08m	+5.4%	-0.5%	
<i>Proposed Development</i>			<i>-£10.58m</i>	<i>£10.58m</i>			
Total	£70.24m	£74.37m	-£10.21m	£84.59m	+20.4%	+13.7%	
PRIMARY CATCHMENT AREA TOTAL							
	£522.40m	£546.32m	£0.00m	£546.32m	+4.6%	+0.0%	

Scenario C – Trade Diversion and Retail Impact

- 2.34 Table 2.5C sets out the trade diversion assumptions for Scenario C which assumes occupation of the unit for a non-food (general) discounter. Table 2.6C identifies the impacts arising using the same measures set out in Table 2.6A.

TABLE 2.5C: DERIVATION OF TRADE DIVERSION - SCENARIO B - NON-FOOD DISCOUNTER

2014 Prices

	Convenience Goods					Comparison Goods					Total Trade Diversion All Goods
	2023 Turnover (Conv only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2023 Turnover (Comp only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Comparison	Total Trade Diversion Comparison	
BURY ST EDMUNDS CITY CENTRE											
The Arc											
Convenience	£0.49m	1	4	0.0%	£0.00m						£0.00m
Comparison						£92.07m	2	4	21.5%	£0.85m	£0.85m
TOTAL	£0.49m			0.0%	£0.00m	£92.07m			21.5%	£0.85m	£0.85m
Robert Boby Retail Park											
Convenience	£21.49m	3	4	10.0%	£0.13m	£2.56m	1	4	0.5%	£0.02m	£0.15m
Comparison						£7.09m	3	4	2.5%	£0.10m	£0.10m
						£2.56m	2	4	0.5%	£0.02m	£0.02m
TOTAL	£21.49m			10.0%	£0.13m	£12.21m			3.5%	£0.14m	£0.27m
Remainder of City Centre											
Convenience	£15.18m	4	4	10.0%	£0.13m						£0.13m
Comparison						£121.29m	4	4	50.0%	£1.98m	£1.98m
TOTAL	£15.18m			10.0%	£0.13m	£121.29m			50.0%	£1.98m	£2.11m
TOTAL CITY CENTRE											
Convenience	£37.16m			20.0%	£0.26m						£0.26m
Comparison						£225.57m			75.0%	£2.96m	£2.96m
TOTAL	£37.16m			20.0%	£0.26m	£225.57m			75.0%	£2.96m	£3.23m
St Edmundsbury Retail Park											
Convenience											
All Comparison	£1.98m	5	5	2.0%	£0.03m	£31.56m	3	5	15.0%	£0.59m	£0.62m
	£1.98m			2.0%	£0.03m	£31.56m			15.0%	£0.59m	£0.62m
Bartons Retail Park											
Convenience	£2.02m	2	5	1.0%	£0.01m						£0.01m
Comparison						£2.25m	2	5	0.0%	£0.00m	£0.00m
	£2.02m			1.0%	£0.01m	£2.25m			0.0%	£0.00m	£0.01m
Other Major Foodstores											
Aldi	£26.22m	3	2	7.0%	£0.09m	£5.89m	3	2	1.0%	£0.04m	£0.13m
Asda	£41.68m	4	2	14.0%	£0.18m	£4.96m	3	2	0.5%	£0.02m	£0.20m
Co-op	£3.25m	4	2	1.0%	£0.01m	£0.39m	3	2	0.0%	£0.00m	£0.01m
Sainsbury's	£39.23m	4	5	34.0%	£0.45m	£4.67m	3	5	1.0%	£0.04m	£0.49m
Tesco	£38.54m	4	3	20.5%	£0.27m	£4.59m	3	3	1.0%	£0.04m	£0.31m
	£148.92m			76.5%	£1.01m	£20.49m			3.5%	£0.14m	
Other Major Non-Foodstores											
Matalan						£4.11m	2	5	0.5%	£0.02m	£0.02m
The Range						£3.71m	5	2	0.5%	£0.02m	£0.02m
B&M	£1.58m	5	2	0.5%	£0.01m	£4.83m	5	2	0.5%	£0.02m	£0.03m
Glasswells						£6.97m	1	2	0.0%	£0.00m	£0.00m
House of Harmony						£1.09m	1	5	0.0%	£0.00m	£0.00m
DJ Evans						£0.77m	1	4	0.0%	£0.00m	£0.00m
B&Q						£6.01m	1	4	0.0%	£0.00m	£0.00m
Miscellaneous Others						£45.31m	3	3	5.0%	£0.20m	£0.20m
Total	£1.58m			0.5%	£0.01m	£72.80m			7%	£0.00m	£0.00m
PRIMARY CATCHMENT AREA TOTAL											
	£191.67m			100.0%	£1.32m	£352.67m			100.0%	£3.95m	£5.27m

TABLE 2.6C: CALCULATION OF RETAIL IMPACT- SCENARIO C - NON-FOOD DISCOUNTER

2014 Prices

	A	B	C	D	E	F	G
	2021 Existing Turnover (Without Proposed Dvpt)	2023 Turnover without Proposed Development	Trade Diversion (All Goods)	2023 Turnover with Proposed Development	Turnover Change 2021 with Dvpt v 2023 without Dvpt	Turnover Change 2023 with Dvpt v 2023 without Dvpt	Residual Turnover rate £psm
BURY ST EDMUNDS CITY CENTRE							<i>convenience goods only</i> <i>coomparison goods only</i>
The Arc							
Convenience	£0.48m	£0.49m	£0.00m	£0.49m	+2.1%	+0.0%	£8,157psm
Comparison	£86.89m	£92.07m	£0.85m	£91.23m	+5.0%	-0.9%	£11,883psm
TOTAL	£87.37m	£92.57m	£0.85m	£91.72m	+5.0%	-0.9%	
Robert Boby Retail Park							
Convenience Waitrose	£23.45m	£24.05m	£0.15m	£23.89m	+1.9%	-0.6%	£11,016psm
Comparison TK Maxx	£6.69m	£7.09m	£0.10m	£6.99m	+4.5%	-1.4%	£4,434psm
Halfords	£2.42m	£2.56m	£0.02m	£2.54m	+5.1%	-0.8%	£3,471psm
TOTAL	£32.56m	£33.70m	£0.27m	£33.43m	+2.7%	-0.8%	
Remainder of City Centre							
Convenience	£14.86m	£15.18m	£0.13m	£15.05m	+1.3%	-0.9%	£7,398psm
Comparison	£114.46m	£121.29m	£1.98m	£119.32m	+4.2%	-1.6%	£7,901psm
TOTAL	£129.33m	£136.47m	£2.11m	£134.37m	+3.9%	-1.5%	
TOTAL CITY CENTRE							
Convenience	£36.38m	£37.16m	£0.28m	£36.88m	+1.4%	-0.8%	£9,148psm
Comparison	£212.88m	£225.57m	£2.94m	£222.63m	+4.6%	-1.3%	£8,750psm
TOTAL	£249.26m	£262.74m	£3.23m	£259.51m	+4.1%	-1.2%	
St Edmundsbury Retail Park							
Convenience	£1.94m	£1.98m	£0.00m	£1.98m	+2.1%	+0.0%	
All Comparison	£31.73m	£33.54m	£0.62m	£32.93m	+3.8%	-1.8%	£2,940psm
	£33.67m	£35.53m	£0.62m	£34.91m	+3.7%	-1.7%	
Bartons Retail Park							
Convenience Farmfoods	£1.98m	£2.02m	£0.01m	£2.01m	+1.5%	-0.7%	£5,272psm
Comparison	£2.12m	£2.25m	£0.00m	£2.25m	+6.0%	+0.0%	£1,500psm
	£4.10m	£4.27m	£0.01m	£4.26m	+3.8%	-0.3%	
Other Major Foodstores							
Aldi	£31.23m	£32.11m	£0.13m	£31.98m	+2.4%	-0.4%	£27,599psm
Asda	£45.48m	£46.64m	£0.20m	£46.43m	+2.1%	-0.4%	£13,354psm
Co-op	£3.55m	£3.64m	£0.01m	£3.63m	+2.2%	-0.4%	£2,963psm
Sainsbury's	£42.81m	£43.90m	£0.49m	£43.41m	+1.4%	-1.1%	£12,942psm
Tesco	£42.06m	£43.13m	£0.31m	£42.82m	+1.8%	-0.7%	£11,513psm
	£165.13m	£169.42m	£1.15m	£168.27m	+1.9%	-0.7%	
Other Major Non-Foodstores							
Matalan	£3.88m	£4.11m	£0.02m	£4.09m	+5.5%	-0.5%	£1,787psm
The Range	£3.50m	£3.71m	£0.02m	£3.69m	+5.4%	-0.5%	£2,983psm
B&M	£6.10m	£6.41m	£0.03m	£6.38m	+4.6%	-0.4%	£3,470psm
Glasswells	£6.58m	£6.97m	£0.00m	£6.97m	+6.0%	+0.0%	£1,000psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+6.0%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.77m	£0.00m	£0.77m	+6.0%	+0.0%	£1,500psm
B&Q	£5.67m	£6.01m	£0.00m	£6.01m	+6.0%	+0.0%	£1,534psm
Miscellaneous Others	£42.76m	£45.31m	£0.20m	£45.11m	+5.5%	-0.4%	
<i>Proposed Development</i>			£-5.27m	£5.27m			
Total	£70.24m	£74.37m	£-5.00m	£79.38m	+13.0%	+6.7%	
PRIMARY CATCHMENT AREA TOTAL	£522.40m	£546.32m	£0.00m	£546.32m	+4.6%	+0.0%	

Sensitivity Tests

2.35 Retail impact assessment calculations are dependent on the assumptions used for the assessments. Although considerable effort has been made to make the assumptions as accurate as possible it is recognised that there will be some uncertainty regarding the results. The use of Sensitivity Tests by altering key assumptions reduces this uncertainty. These tests can show the range of impacts that could arise and also to what extent the results of impact change in line with different assumptions – for example, if calculated retail impacts are identified to be insensitive to change (i.e. impacts figures change only slightly even with substantial changes in assumptions) this can give considerable confidence to the results of the retail impact assessment for identifying the scale of adverse retail impact anticipated to occur.

2.36 The following sensitivity tests have been adopted:

- Test 1: The Central Case – this is based on the assumptions described above for each of the three scenarios and provides the best estimates of the characteristics of the proposed development and existing floorspace.
- Test 2A: Increasing the development turnover by +25%.
- Test 2B: Decreasing the development turnover by -25%.
- Test 3: Assume that only 90% of the trade draw to the development is from the identified Primary Catchment Area. Under this test it is assumed that 10% of trade diversion is from shops in centres located outside the PCA.
- Test 4A: Amend the trade diversion assumptions by reducing the trade diversion from the City Centre by one third with an increase in trade diversion from locations elsewhere in BSE. This results in lower impacts on the City Centre but higher impacts elsewhere.
- Test 4B: Amend the trade diversion assumptions by increasing the trade diversion from the City Centre by one third with a decrease in trade diversion from locations elsewhere in BSE. This results in higher impacts on the City Centre but lower impacts elsewhere.

2.37 The results of the Sensitivity Tests on the calculation of retail impact for the City Centre and two identified retail parks for all three scenarios is set out in Table 2.8. These show that the percentage impacts arising from the proposed development identified in this RIA have a limited range indicating the assessment has produced robust results and a high level of confidence can be placed on these when considering the significance of potential impacts arising from the proposal. From this Table one can identify the full range of retail impacts whichever development scenario is considered and, from this, the potential maximum adverse retail impact that would occur from the development proposal. These impacts are:

- Bury St Edmunds City Centre:
 - *Direct impacts in 2023. All goods: -1% to -2%.*

- *Impacts taking into account expenditure change: All goods: +4% to +5% (i.e. whichever scenario and sensitivity test is adopted the City Centre will experience a net increase in turnover even with the proposed development being implemented).*

- St Edmundsbury Retail Park:
 - *Direct impacts in 2023. All goods: -0% to -3%.*

 - *Impacts taking into account expenditure change: All goods: +3% to +6%.*

- The Bartons Retail Park:
 - *Direct impacts in 2023. All goods: -0% to -4%.*

 - *Impacts taking into account expenditure change: All goods: +0% to +4%.*

2.38 The significance of the quantitative retail impacts identified on the vitality and viability of centres affected is addressed in Section 3.

TABLE 2.7 - SENSITIVITY TEST RESULTS - ALL SCENARIOS

Test	Bury St Edmunds City Centre % Change in Turnover		St Edmundsbury Retail Park % Change in Turnover		The Bartons Retail Park % Change in Turnover	
	2023 with Dvpt v 2021 without	2023 with Dvpt v 2023 without	2023 with Dvpt v 2021 without	2023 with Dvpt v 2023 without	2023 with Dvpt v 2021 without	2023 with Dvpt v 2023 without
SCENARIO A - FOOD DISCOUNTER						
1. Central Case	4.1%	-1.2%	4.8%	-0.9%	0.9%	-3.1%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	3.8%	-1.5%	4.5%	-1.1%	0.1%	-3.8%
2B. Reduce Turnover -25%	4.5%	-0.9%	5.0%	-0.7%	1.7%	-2.3%
3. Assume 90% of turnover is drawn from PCA	4.2%	-1.1%	4.9%	-0.8%	1.2%	-2.8%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	4.6%	-0.7%	3.9%	-1.7%	0.8%	-3.2%
4A: Increase trade diversion from City centre by 33%	3.9%	-1.4%	5.2%	-0.5%	1.7%	-2.3%
SCENARIO B - MID-SIZE SUPERMARKET						
1. Central Case	4.1%	-1.2%	4.9%	-0.8%	0.8%	-3.0%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	3.8%	-1.5%	4.7%	-1.0%	-0.0%	-3.2%
2B. Reduce Turnover -25%	4.5%	-0.9%	5.1%	-0.6%	1.6%	-2.4%
3. Assume 90% of turnover is drawn from PCA	4.3%	-1.1%	5.0%	-0.7%	1.1%	-2.9%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	4.6%	-0.8%	4.5%	-1.2%	0.4%	-3.6%
4A: Increase trade diversion from City centre by 33%	3.7%	-1.6%	5.2%	-0.5%	1.2%	-2.4%
SCENARIO C - NON-FOOD DISCOUNTER						
1. Central Case	4.1%	-1.2%	3.8%	-1.8%	3.8%	-0.3%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	3.8%	-1.5%	3.3%	-2.3%	3.7%	-0.4%
2B. Reduce Turnover -25%	4.4%	-0.9%	4.3%	-1.4%	3.9%	-0.2%
3. Assume 90% of turnover is drawn from PCA	4.2%	-1.1%	4.0%	-1.7%	3.8%	-0.3%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	4.5%	-0.9%	2.8%	-2.8%	3.8%	-0.3%
4A: Increase trade diversion from City centre by 33%	3.7%	-1.6%	5.7%	-0.1%	3.8%	-0.3%
<i>(max trade diversion from CC for comp goods = 100%)</i>						
Range	+4% to +5%	-1% to -2%	+3% to +6%	-3% to -0%	+0% to +4%	-0% to -4%

3 Significance of Retail Impact

Approach to Assessing Significance

- 3.1 Section 2 has quantified the estimated retail impact in terms of percentage change in turnover resulting from the proposed development and residual (i.e. post-impact) sales densities. This assessment has considered both the level of turnover in 2023 with the proposed development with both existing turnover (2021) and the turnover in 2023 that would have occurred without the proposals. Furthermore, the assessment has considered the impact on the convenience and comparison goods sectors alone and on all retail goods in centres.
- 3.2 In assessing significance of impact, it is important to put quantitative measures of impact in an appropriate context by assessing the sensitivity of centres affected to adverse retail effects – this is achieved by assessing the vitality and viability of centres affected. The remainder of this section therefore considers each of the following to allow an assessment of the significance of retail impact:
- Information on the vitality and viability of centres.
 - Quantitative measures of retail impact from the RIA.
 - Variability in retail impacts arising as seen through applying the different sensitivity tests and development scenarios.

Bury St Edmunds City Centre: Health Check

- 3.3 Detailed information on the vitality and viability of Bury St Edmunds City Centre was provided in the 2016 Retail Study. This information has been updated using information from the following sources:
- Survey of the City Centre undertaken in June 2021 (App B).
 - Charles Goad survey of the City Centre in Jan 2021 (App C).
 - Property market information.
- 3.4 Chapter 6 of the SERLS sets out in detail a description of the City Centre and provides a comprehensive health check of the centre. As a result, this section only provides a summary of the principal findings from the 2016 Study and focuses on key changes to the indicators of vitality and viability insofar these are available taking into account potential short-term effects arising from the Covid-19 pandemic restrictions. This section follows the principal headings used in the SERLS report.

Retail Composition and Diversity of Uses

- 3.5 The principal findings of the report in relation to retail composition and mix of uses of the centre are as follows:
- BSE is ranked 130th in 2015 Venuescore ranking of all centres – significantly higher than 2007 when it was ranked 210th. Javelin rank the centre as “middle” market position based on its shopping/fashion offer.

- Three distinct areas are identified within the City Centre – The Arc, Cornhill/Buttermarket/The Traverse and Abbeygate Street. However, the study did not include Robert Boby RP as part of the City Centre and this could be considered to be a fourth distinct part of the City Centre.
- The study identified 437 retail, service and vacant units. No floorspace was identified. Table 3.1 shows changes between the study and the June 2021 survey.

Table 3.1: Retail and Service Units – BSE City Centre

Category	No. of Units		Floorspace Sq M GFA (% of total)
	2016	2021	2021
Convenience	16 4%	249 6%	6,572 (7%)
Comparison	196 45%	155 35%	36,255 (39%)
All services	180 41%	203 45%	35,501 (38%)
Vacant	45 10%	54 12%	8,335 (9%)
Total	437	449	93,722

3.6 The principal changes identified in Table 3.1 are a significant increase in convenience goods shops (from 16 to 29) but a significant decline in comparison goods shops (from 196 to 155). In part this decline may reflect both greater merging of retail services and retail goods activities in individual units and also merging of smaller units to form larger ones but, regardless of these trends there has been a reduction in comparison goods shops in the City Centre. Service units (combining retail, leisure and business/financial services) have grown significantly. In this respect BSE reflects national trends with decline in the number of goods shops but increases in services.

3.7 Over the same period there has been a growth in vacant units. A significant aspect of this will, however, be the effect of the covid-19 pandemic and it is notable that the Goad Jan 2021 survey identified significantly higher vacant premises than were surveyed just 5 months later (see Table 3.2). It follows that there remains uncertainty as to the true level of vacancies in the City Centre at the current time.

Multiples and Independents Representation

3.8 The SERLS noted that the 2015 Goad survey report identified 165 multiple retailers in the City Centre – an increase from 159 identified in 2007. The Jan 2021 Goad survey identified a significant drop to 135 multiple outlets implying a significant increase in independent traders (retail goods and all services) over the same period. The 2016 Study noted that the centre had, at the time, “a strong independent retail and service offer” and this appears to have strengthened further between 2016 and 2021.

Street Market

- 3.9 The City Centre continues to have a twice weekly street market with ca. 80+ stalls retailing a wide range of convenience and comparison goods. This is an important and attractive feature of the City Centre.

Vacancies

- 3.10 Table 3.2 combines information from the SERLS with current data to identify changes in vacancies.

Table 3.2: Vacancies – BSE City Centre

Category	Vacant Units	
	No. of Units (% of total)	GFA (% of Total)
2011 Goad	45 (10.3%)	10,925 (12.4%)
2015 Goad	47 (10.7%)	6,800 (7.8%)
Jan 2021 Goad	64 (14.4%)	18,078 (21.0%)
June 2021 HPL (Goad classification)	54 (12.0%)	15,394 (16.4%)

- 3.11 The SERLS also notes a survey undertaken by the Council's Town Centre Audit in April 2016 which identified a very low number of vacancies – this has not been included on the basis that, reflecting the large difference between this and the Goad survey of 2015, it is likely to have been undertaken on a different basis which makes comparison difficult.
- 3.12 Comment above has highlighted the rapid change observed between Jan and June 2021 which is likely to be explained in part due to the relaxation of covid social distancing restrictions and the re-opening of businesses. However, notwithstanding this it is likely, but not certain, that there has been some increase in vacancies since 2016. The most important of these is the closure of Debenhams which reflects national failure of that business. This is a large unit which has had a major impact on the floorspace vacancy rate.
- 3.13 Compared to other towns Goad (Jan 2021) indicate that the national vacancy rate is 13.9% by number of units and 12.75% by floor area. This would suggest that BSE is close to or slightly below average rates for numbers of vacant units but above average for vacant floorspace (although this would have risen nation-wide since January 2021 due to the closure of Debenhams stores).

Retailer Requirements

- 3.14 The 2016 Study identified strong demand from retailers for requirements in BSE and that this had increased since 2012. However, as a result of the current pandemic it is very difficult to establish an accurate position at the current time.

Retail Rents

- 3.15 The 2016 study (figure 6.1) identified changes in prime (zone A) retail rents which was ca. £100 psf and were about 15% below the pre-recession (2008) peak of £115. But this reduction was lower than for all centres (which, at that time, were 28% below the peak).
- 3.16 Due to the covid-19 pandemic and its effects on the property industry it is not possible to provide a meaningful assessment of rents at the current time.

Customer Perceptions

- 3.17 The 2016 set out information on perceptions of the City Centre from the household and in-street surveys. This indicated that:
- a high proportion of respondents appear to be happy with the town centre as it is;
 - the most frequently suggested improvements included more/better parking, and improving congestion and road access in the town;
 - the most positive attributes identified for the centre was its “character/atmosphere”, its proximity (to home/work) and the historic buildings/tourist attractions;
 - significantly, 67% of respondents did not identify any particular feature of the City Centre that they disliked. The biggest dislike was associated with associated with car parking issues (12%) – cheaper parking was suggested as the most common improvement but this was made by only 5% of respondents.

Environmental Quality

- 3.18 The environmental quality of much of the City Centre is very high reflecting the large Conservation Area, numerous listed buildings, the Abbey/Cathedral and attractive parkland/open space. Furthermore, the Arc remains (even with the closure of Debenhams) an attractive modern shopping centre with direct parking access.

Sales Densities

- 3.19 In addition to information on rents and vacancies sales densities provide additional information on the viability of a centre. As noted in Section 2 the SERLS implies extremely high sales densities for comparison goods shops within the City Centre. For the reasons highlighted earlier it is considered that reliance cannot be placed on the implied sales densities but, nonetheless, it is reasonable to assume that sales densities within the centre are strong and expected to be above relevant national averages. This is consistent with relatively high demand from potential occupiers for space.

Summary and Conclusions

- 3.20 Notwithstanding the current hiatus associated with the covid-19 pandemic, it is considered that BSE City Centre provides, in overall terms, a very health and vibrant City Centre. Indicators of viability are relatively mixed – average-above average vacancies imply weakness whereas moderate-high rent levels when compared to other towns and cities of comparable size, and above average sales densities and indicative of strength. However, the indicators of vitality including mix of uses and the very high environmental quality of much of the City Centre,

including a mix of modern and traditional retail areas, and significant traffic calmed areas, indicate that the centre is strong in terms of its vitality.

Bury St Edmunds: Significance of Retail Impacts

3.21 The calculated impacts of the development on Bury St Edmunds City Centre are as follows:

Scenario A

- The *direct* impact of the proposed development (Scenario A) in the design year is approximately -4% reduction in convenience goods, -1% comparison goods and -1% all goods turnover
- Turnover would be -2% *lower* in 2023 compared to 2021 for convenience goods, +5% *higher* for comparison goods and +4% *higher* for all goods.
- After retail impact, convenience goods sales densities in 2023 would range between £7,100 and £10,600 psm and comparison goods sales densities would range between £3,500 and £11,950 psm.

Scenario B

- The direct impact of the proposed development (Scenario B) in the design year is approximately -5% reduction in convenience goods, -1% comparison goods and -1% all goods turnover
- Turnover would be -3% *lower* in 2023 compared to 2021 for convenience goods, +5% *higher* for comparison goods and +4% *higher* for all goods.
- After retail impact, convenience goods sales densities in 2023 would range between £7,200 and £10,400 psm and comparison goods sales densities would range between £3,500 and £11,950 psm.

Scenario C

- The direct impact of the proposed development (Scenario C) in the design year is approximately -1% reduction in convenience goods, -1% comparison goods and -1% all goods turnover
- Turnover would be +1% *higher* in 2023 compared to 2021 for convenience goods, +5% *higher* for comparison goods and +4% *higher* for all goods.
- After retail impact, convenience goods sales densities in 2023 would range between £7,400 and £11,000 psm and comparison goods sales densities would range between £3,450 and £11,900 psm.

3.22 Table 2.7 also identifies the full range of impacts on the City Centre across the development scenarios combined with the sensitivity tests. These show that the direct impacts (i.e. in 2023 with the proposal compared to 2023 without the proposal) has minimal variation between -1% and -2% impacts. Furthermore, in all scenarios and all sensitivity tests, the turnover of the City Centre would be between 4% and 5% *higher* compared to the current position in 2021. These direct impacts are extremely low and, given the relative health of the town centre, it is

concluded that the impact of either of the scenarios for the proposed development would not undermine the vitality or viability of the City Centre as a whole.

- 3.23 The Scoping Note specifically requested that the assessment should take account of the planned investment at 17-18 Cornhill. This development, which commenced in late 2020, proposes two ground floor commercial units. Since this space is not currently available and it is not known whether the units would be occupied by retail goods shops or services the potential turnover of these is not included within the retail impact tables. However, the type of retail proposed at the application site and scale of impacts identified above will mean that the application would not affect the redevelopment of Cornhill in any way.
- 3.24 Various aspirations for the City Centre are also identified in the Town Centre Masterplan (Dec 2017) which is a material consideration in the determination of the planning application although it does not form part of the development plan. The masterplan identifies a series of priorities and aspirations for different parts of the centre but only limited information is provided on specific projects. This RIA has demonstrated that the proposed development would have a negligible impact on the turnover of retail shops within the City Centre and that, as a whole, even with the proposed development, the turnover of the City Centre would be higher in 2023 than currently in 2021. Furthermore, the proposed development is expressly targeting retail formats suited to an out-of-centre location and would not, therefore, have any adverse implications for the City Centre Masterplan.
- 3.25 In conclusion the proposed development unrestricted retail development at the application site will not affect the vitality or viability of Bury St Edmunds City Centre.

St Edmundsbury Retail Park (SERP)

- 3.26 St Edmundsbury Retail Park, along with the J Sainsbury superstore and units on the east side of Easlea Road are identified as part of site BV17 Bury St Edmunds Vision document. This policy does not identify the retail park as part of a centre nor a location to be protected through planning policy although it does identify that any proposals for additional space within this location would only be assessed in terms of criteria (a) (i.e. application of the sequential approach) and (b) (retail impact assessment).
- 3.27 In addition, the SERLS report identified the retail park as a distinct retail location for the purposes of describing retail floorspace within BSE and as part of the retail model. As a result of these factors impacts on SERP have been identified separately in Tables 2.6A-C and Table 2.7.

Vitality and Viability

- 3.28 Concepts of town centre health checks and indicators of vitality and viability are not normally considered relevant for retail parks. This reflects the fact that the range of activity and land uses within retail parks is, generally, quite limited. The following provides a brief summary of the characteristics of the retail park which are relevant for assessing the significance of the potential impact of the proposed development on SERP.

Range of Uses

- 3.29 SERP has been developed in two phases. The initial part comprises 8 units – 7 major retail units totalling 9031 sq m GFA and one small pod (139 sq m GFA). All, except one, of the major units are for bulky comparison goods and one unit is for pets. The small pod is being marketed for general comparison goods. The second

phase comprises 3 large units – one for bulky comparison goods and two for general comparison (including one with a significant food offer). All units are occupied by multiple retailers. The pod unit is vacant.

Floorspace and Turnover

3.30 The total floorspace is 93722 sq m GFA and the turnover is estimated to be £29.8m comparison goods and £1.9m convenience goods.

Environment

3.31 The character of SERP is typical of retail parks – dominated by car parking in front of the retail units.

Significance of Retail Impact

3.32 The calculated impacts of the development on SERP are as follows:

Scenario A

- The direct impact of the proposed development (Scenario A) in the design year is approximately 0% reduction in convenience goods, -1% comparison goods and -1% all goods turnover
- Turnover would be +2% *higher* in 2023 compared to 2021 for convenience goods, +5% *higher* for comparison goods and +5% *higher* for all goods.
- After retail impact, sales densities in 2023 would be circa £3000 psm for comparison goods.

Scenario B

- The direct impact of the proposed development (Scenario A) in the design year is approximately 0% reduction in convenience goods, -1% comparison goods and -1% all goods turnover
- Turnover would be +2% *higher* in 2023 compared to 2021 for convenience goods, +5% *higher* for comparison goods and +5% *higher* for all goods.
- After retail impact, sales densities in 2023 would be circa £3000 psm for comparison goods.

Scenario C

- The direct impact of the proposed development (Scenario A) in the design year is approximately 0% reduction in convenience goods, -2% comparison goods and -2% all goods turnover
- Turnover would be +2% *higher* in 2023 compared to 2021 for convenience goods, +4% *higher* for comparison goods and +4% *higher* for all goods.
- After retail impact, sales densities in 2023 would be circa £3000 psm for comparison goods.

- 3.33 Table 2.7 also identifies the full range of impacts on SERP Centre across the development scenarios combined with the sensitivity tests. These show that the direct impacts (i.e. in 2023 with the proposal compared to 2023 without the proposal) varies between -0% and -3% impacts. Furthermore, in all scenarios and all sensitivity tests the turnover of the SERP would be between 3% and 6% *higher* compared to the current position in 2021. These direct impacts are very low and, given the characteristics of the SERP, it is concluded that the impact of either of the scenarios for the proposed development would not undermine the vitality or viability of the Retail Park as a whole.
- 3.34 In conclusion the proposed development unrestricted retail development at the application site will not affect the vitality or viability of the St Edmundsbury Retail Park.

The Bartons Retail Park

- 3.35 The Bartons Retail Park area is identified to comprise site BV15(a) and part of BV14(b) in the Bury St Edmunds Vision document. The former policy is concerned with alternative business development within an employment area – this site is now occupied by Farmfoods for the retail of frozen foods. The latter is identified as part of a general employment area. No part of the Bartons retail Park is therefore identified to form part of the network of retail centres within BSE.
- 3.36 Nonetheless the Bartons RP is identified separately in the SERLS and, on this basis alone, it is identified separately in this retail assessment.

Vitality and Viability

Range of Uses

- 3.37 The Bartons RP is not a purpose built retail park. Instead, it comprises a diverse mix of units that have, over time, become increasingly focussed on retail activities. In total there are 8 retail goods units (1 convenience – Farmfoods) and the remainder retailing a range of, mostly, bulky comparison goods, predominantly furniture. However general comparison goods are also sold. In addition, there are two fast food/take away premises.

Floorspace and Turnover

- 3.38 The total floorspace is 2921 sq m GFA of which 250 sq m is estimated for leisure services and the retail goods' turnover is estimated to be £2.3m comparison goods and £2.0m convenience goods.

Environment

- 3.39 The character of the Bartons is that of a run of diverse older industrial/commercial properties fronting onto Barton Road with a relatively low environmental quality.

Significance of Retail Impact

- 3.40 The calculated impacts of the development on The Bartons RP are as follows:

Scenario A

- The direct impact of the proposed development (Scenario A) in the design year is approximately -5% reduction in convenience goods, -1% comparison goods and -3% all goods turnover
- Turnover would be -3% lower in 2023 compared to 2021 for convenience goods, +5% *higher* for comparison goods and +1% *higher* for all goods.
- After retail impact, convenience goods sales densities in 2023 would be circa £5000 psm and £1500 psm for comparison goods.

Scenario B

- The direct impact of the proposed development (Scenario A) in the design year is approximately -6% reduction in convenience goods, -1% comparison goods and -3% all goods turnover
- Turnover would be -4% lower in 2023 compared to 2021 for convenience goods, +5% *higher* for comparison goods and +1% *higher* for all goods.
- After retail impact, convenience goods sales densities in 2023 would be circa £5000 psm and £1500 psm for comparison goods.

Scenario C

- The direct impact of the proposed development (Scenario A) in the design year is approximately -1% reduction in convenience goods, 0% comparison goods and -0% all goods turnover
- Turnover would be +2% higher in 2023 compared to 2021 for convenience goods, +6% *higher* for comparison goods and +4% *higher* for all goods.
- After retail impact, convenience goods sales densities in 2023 would be circa £5000 psm and £1500 psm for comparison goods.

3.41 Table 2.7 also identifies the full range of impacts on The Bartons RP across the development scenarios combined with the sensitivity tests. These show that the direct impacts (i.e. in 2023 with the proposal compared to 2023 without the proposal) varies between -0% and -4% impacts. Furthermore, in all scenarios and all sensitivity tests the turnover of the SERP would be between 0% and 4% *higher* compared to the current position in 2021. These direct impacts are very low and, given the characteristics of the Bartons RP, it is concluded that the impact of either of the scenarios for the proposed development would not undermine the vitality or viability of this retail location as a whole.

Summary and Conclusion

- 3.42 The retail impact assessment has considered both the scale of trade diversion and the existing vitality and viability of all principal centres potentially affected by the proposed development, in particular on Bury St Edmunds City Centre. The assessment has also considered the potential variation in calculated retail impacts through the use of reasonable sensitivity tests for the assessments. In all cases the retail impacts arising from the proposed development will be very limited and will not significantly affect the vitality or viability of the City Centre nor any other retail location..
- 3.43 The RIA has also assessed impacts arising from three different development scenarios for the re-use of the existing building:
- Scenario A – re-use as a discount foodstore.
 - Scenario B – re-use as a mid-sized general supermarket.
 - Scenario C – re-use as a non-food discount store.
- 3.44 Other potential uses for the proposed retail unit can be considered (such as use for bulky goods retail, freezer centre or similar), however, these alternatives will result in impacts *lower* than the three scenarios tested in this RIA. The RIA has demonstrated that none of the scenarios would have significant adverse impacts on the vitality or viability of Bury St Edmunds City Centre nor on other retail locations within the City.

4 Application of the Sequential Test

Introduction

Policy Requirement for the Sequential Test

- 4.1 The application of the sequential test has been undertaken in accordance with the requirements of the development plan and the NPPF including the Government's guidance for Town Centres and Retail. It addresses each of the sites identified in the Council's Scoping Note provided to the applicants' agents.

Development Plan

- 4.2 Policy CS10 of the St Edmundsbury Local Development Framework Core Strategy (2010) states:

Retail and leisure activity elsewhere will be focused on those Key Service and Local Service Centres identified in Core Strategy Policy CS4 and in the new local centres located in the areas for growth identified in Policies CS11 and CS12. The development of services and facilities in these locations will be expected to be of an appropriate scale and character to reflect the role and function of the local centres and in accordance with the sequential approach.

- 4.3 The policy does not provide a definition of what constitutes the sequential approach.

- 4.4 Policy DM35 of the West Suffolk Joint Development Management Policies Document (2015) provides a comparable requirement but with some clarification of what is intended in the sequential approach:

Proposals for main town centre uses that are not in a defined centre and not in accordance with an up to date Local Plan must apply a sequential approach in selecting the site demonstrating that there are no suitable, viable and available sites in defined centres or edge of centre locations.

- 4.5 A similar requirement is set out in Policy BV17 of the Bury St Edmunds Vision 2031 (2014) document which states:

Proposals for retail floorspace outside defined centres will only be permitted where they comply with the following criteria:

- a. *that a sequential approach has been adopted in selecting the site demonstrating that there are no suitable, viable and available sites in defined centres or edge-of-centre locations;...*

- 4.6 From this the key requirements of the sequential approach (test) is that, for any proposed out-of-centre location, such as the application site, it needs to be demonstrated that there are no suitable, viable and available sites within the defined centres or in edge-of-centre locations.

NPPF

- 4.7 A similar requirement is set out in the National Planning Policy Framework:

86. *Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.*

87. *When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.*

4.8 The Town Centres and Retailing Guidance provides some additional information including a checklist that should be taken into account in determining whether or not a proposal complies with the sequential test. This checklist includes the following:

- *with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.*
- *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 or 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.*

Principles for Applying the Sequential Approach/Test

4.9 From the above review it is clear that a number of factors need to be taken into account when applying the sequential approach:

- In the context of an out-of-centre proposal, such as the application site, are there suitable, viable and available sites/premises in either town centre or edge-of-centre locations? If so, these would be sequentially preferable to the application site.
- In considering *suitability* of alternatives has a reasonably flexible approach been adopted regarding the form or scale of the proposal? In particular are more central sites able to make a “contribution” to accommodate a proposal?
- The boundary of the town centre is defined on the Bury Vision 2015 proposals map. However, consideration needs to be given to how “edge-of-centre” is defined to allow the categorisation of both the application site and potential alternative locations which are assessed as part of the sequential test.

4.10 It is important that these matters are addressed before considering potential alternative sites/premises for the proposed development.

Suitability and Flexibility

- 4.11 A key requirement of the sequential approach is the assessment of whether alternative sites are suitable/unsuitable for the development proposal (Policy DM35) and whether or not a reasonably flexible approach has been adopted by the applicants when considering these alternatives (Town Centres and Retailing Guidance).
- 4.12 The question of suitability and flexibility has been expressly considered in legal cases including at the Supreme Court, in particular in relation to the interpretation of the sequential approach policy in Scotland, which has direct application to the same policy in England.
- 4.13 In *Lidl UK GmbH v North Ayrshire Council and Scottish Ministers (2006)* Lord Glennie confirmed that, in the application of the approach, regard should be had to the identification of sites or premises capable of accommodating the proposed development and that it is not appropriate for the decision-maker to seek to change the type of development in order to make it fit other sites or premises. In this decision Lord Glennie stated *“The question is whether the alternative town centre site, in this case the existing Lidl 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 into the alternative site.”*
- 4.14 This approach, i.e. in identifying whether or not the proposed development can fit within the suggested alternative site was endorsed by judges in the Supreme Court in the case of *Tesco Stores Ltd v Dundee City Council (2012)*. This case reaffirmed the approach of Lord Glennie cited above. In the Supreme Court Lord Reed considered the extent to which the approach of the developer or operator should be flexible and realistic in the assessment of the suitability of alternatives. This is quoted at some length below because the approach endorsed by Lord Reed is the same approach that has been adopted in this appraisal:

“29...the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains, as Lord Glennie observed in Lidl UK GmbH v Scottish Ministers [2006] CSOH 165, para 14, 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.

“30. In the present case, it is apparent that a flexible approach was adopted. The interveners did not confine their assessment to sites which could accommodate the development in the precise form in which it had been designed, but examined sites which could accommodate a smaller development and a more restricted range of retailing.”

- 4.15 In the same case Lord Hope stated:

“37. ...It is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre.”

- 4.16 Suitability of alternatives does not only apply to the size of alternative sites or premises but also concerns any other factors that are directly relevant to the operation of the proposed retail development. Location is one key factor. The target market area to be served by the proposed development is Bury St Edmunds. Given the characteristics of the proposed development (notably the limited size of the catchment area of this type of

floorspace) then it is clear that a location that is unable to serve this market area would be unsuitable. Although this should be obvious it still needs to be confirmed that a location unable to serve this catchment area, for example within, or on the edge of Haverhill town centre, would not be suitable.

4.17 In terms of flexibility, notwithstanding Lord Hope's comment (i.e. that it is the proposal for which the developer seeks permission that needs to be considered), the judgement of Lord Reed explains what is an appropriately flexible approach. That is the applicant should have *regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing*. In the Dundee case Asda had proposed a major superstore (ca. 8300 sq m GFA) that included a substantial proportion of non-food sales. In the sequential assessment the applicants identified the minimum size of unit that would be able to provide this mix convenience/comparison goods and concluded that it could be possible to provide this type of unit from a store as small as 5500+ sq m GFA with surface level car parking etc. This was the size that was tested for the sequential approach and was accepted by the Supreme Court as the correct approach.

4.18 In his commentary on the case Chris Katkowski QC noted that, in considering proposals in England for the sequential approach:

- that if a site is not suitable for the commercial requirements of the developer in question, then it is not a suitable site for the purposes of the sequential approach; and
- that in terms of the size of the alternative site, provided that the applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site.

4.1 It is important to recognise that the Dundee Case has been directly applied to the same sequential test policy that is in place in development plans throughout England. This includes, for example In Warners Retail (Moreton) Ltd v Cotswold District Council (2014) in which the judgement stated that the differences between the NPPF and Scottish Planning Policy with respect to the sequential approach were not material. In Zurich Assurance v North Lincolnshire Council (2013) where, in the context of an M&S proposal a smaller town centre site was identified by the court to be unsuitable, the judge stated:

It is also important to mark that developerswork in the real world. Marks & Spencer had assessed the only available town centre alternative to the Site, and had concluded that a development that was smaller than that proposed, or one with a more restricted range of goods, was neither commercially viable nor suitable for their commercial requirements."

Defining Edge of Centre

4.2 It is important to define the characteristics of edge-of-centre locations for applying the sequential approach. The NPPF glossary provides an important starting point for this:

For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area.... In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

- 4.3 From this it is important to note that the distance measurement is *up to 300m*. 300 metres therefore sets the maximum appropriate distance for all centres within England i.e. this would apply to the very largest City Centres i.e. London, Birmingham, Manchester etc. All other things being equally it would be expected that distances significantly less than this would be appropriate for smaller centres such as Bury St Edmunds. Even adopting a generous approach this would suggest a maximum distance in the region of 200-250m from the primary shopping area would be relevant for identifying edge-of-centre sites within BSE.
- 4.4 The NPPF notes the importance of taking into account local circumstances. It is essential to take into account the precise characteristics of the physical and functional relationship between a site/premises and the main shopping area to determine whether or not a site should be considered edge-of-centre. An obvious example is that, if a site is within 300m of a major centre but separated by an impenetrable barrier for pedestrian movement (e.g. railway line or dual carriageway etc) then it is clearly not an edge-of-centre site. But there are a wide range of factors that need to be considered in determining the relationship between a site and the main shopping area. For example:
- Are there important barriers to pedestrian movement between the two: the presence of major roads to cross without crossing facilities; or significant gradients/levels changes?
 - The intervisibility between the main shopping area and a site.
 - Intervening land uses. In particular significant non-commercial uses (especially residential areas) will demonstrate a functional separation between a site and the main shopping area of a town centre.
- 4.5 In summary, the fact that a site/premises, or even a part of a site, is within 300m of Bury St Edmunds primary shopping area (or even closer) is not sufficient to determine whether or not it should be considered to be edge of centre.

Comparing Sites within the Same Sequential Category

- 4.6 Policy DM35 is clear that, when applying the sequential approach to an out-of-centre site, there is no requirement to compare alternative out-of-centre sites, i.e. there is no preference for one out-of-centre site compared to another. It states that the requirement is simply to demonstrate that *there are no suitable, viable and available sites in defined centres or edge of centre locations*.

Application of Sequential Approach to the target Bury St Edmunds Market Area

- 4.7 The approach adopted in this assessment reflects the above cases. From these the application of the sequential approach, as set out in Policy DM35, is interpreted to mean the following for the proposed catchment area:
- First preference: Bury St Edmunds City Centre.
 - Second preference: edge of Bury St Edmunds City Centre
 - Third preference: Other out-of-centre locations

Categorisation of Application Site

- 4.8 The application site is located outwith designated town centre and commercial centres. As such it is an Out-of-Centre site in terms of the sequential approach.

Comment on Existing Use

- 4.9 The current use of the unit is as a sports gym. This is within the same use class E as the proposed retail use and planning permission is required only because Condition 2 of the planning consent which permitted the use of the property as a gym (D2) (reference SE/00/2145/P) is believed by the Council to prevent any change of use and binds future amendments to the UCO. As noted in the Planning Statement the applicant is challenging this interpretation and legal advice is being taken on this matter.
- 4.10 Nonetheless, in terms of the sequential approach/test it is clear that this applies equally to the existing leisure use as it does to the proposed gym use. In this sense the current acceptability of the gym use in terms of the sequential approach implies similar acceptability for the proposed retail use.

Alternative Formats

- 4.11 The proposed development is for the change of use of an existing leisure unit to retail. In adopting a flexible approach to the re-use of the unit the applicants have considered a range of retail formats namely: food discounter; general mid-sized supermarket; and non-food general discounter. To consider what is a reasonably flexible approach for these potential occupiers it is necessary to consider each of these formats in turn.

Discount Foodstores

- 4.12 Discount foodstores are operated on the basis of minimising the costs of operation to allow the store to be able to charge low prices. This cost minimisation affects all aspects of the business operation but is particularly important for operation of the stores themselves. In particular:
- Main deliveries are limited normally to one articulated vehicle per day.
 - Goods are transferred direct onto the retail sales floor by pallets – this reduces the need for storage. However recent changes in the development of the format includes increased areas for staff and to meet legislative requirements has resulted in a significant increase in non-sales space with the result that the net to gross ratio of these stores is now in the region of 60-65%.
 - There is a need to ensure that a minimum range of goods are retailed within a single location to ensure that the shop is sufficiently attractive to customers.
 - Additional costs associated with development need to be strictly controlled.
- 4.13 The combination of these factors places major constraints on the type of store that can be developed and would remain economically viable. Reflecting recent changes in the competitive and legislative environment for these stores the practical minimum size for a viable store that would carry the range of goods necessary to draw trade **would need to be at least 1500 sq m GFA with a net sales area significantly greater than 1000 sq m.** Only in exceptional circumstances could stores of this minimum size be considered to be suitable. The most effective

size for efficient and viable discount foodstores is a gross floor area in the range of 1800-2500+ sq m GFA. By way of comparison the Aldi in BSE is marginally below this range (1425 sq m GIFA) reflecting its development before the more recent changes affecting these units whereas the more recent stores in Haverhill are larger (Aldi – 1816 sq m GIFA and Lidl 2371 sq m GIFA). The current proposal is towards the bottom size of this range. Furthermore, a key requirement is the provision of dedicated car parking for shoppers to the store. For this type of catchment area the above factors indicate that the practical minimum size for the operation of a viable discount foodstore is the provision of the following:

- a building with significantly greater than 1500 sq m gross internal floor area (and greater than 1000 sq m net floor area);
- Internal layout that permits the use of pallet trucks for transfer of goods to the shop sales floor;
- Easily accessible dedicated off street car parking (suitable for access by shoppers using trolleys); and
- this would equate to a site area of a minimum of at least 0.65ha.

Mid-Sized Supermarket

4.14 The key factors for determining the minimum size for a mid-sized supermarket is the ability to have sufficient floorspace to provide a reasonable range of goods for main food as well as top-up shopping requirements and to be able to compete with nearby superstores. In this case of the Bury St Edmunds there are a range of large superstores – each of Asda, Tesco and Sainsbury are over 6000 sq m GFA. Furthermore, to enable effective competition the store would need easy access to good levels of car parking as well as to public transport.

4.15 The principal operators for this sector provide further insight into the requirements:

- Tesco has announced that it is phasing out its Tesco Metro format (which were typically 1000-1500 sq m GIFA stores) with emphasis on either its Express stores (smaller convenience-format units) or mainstream larger supermarkets (“Superstores”) which are typically 3000+ sq m GIFA.
- M&S has increased the size of its Foodhall format with the preferred size now a *minimum* 1600 sq m GFA and 1000 sq m sales, and preferably 2000 sq m GFA or greater.
- The Co-op has a supermarket in the north of BSE. This unit is 1937 sq m GIFA with sales of 1259 sq m NFA on a 0.7ha. From the SERLS this indicates that the store is performing poorly in comparison to the nearby superstores with a turnover of only £3.55m equating to a sales density of less than £3000 psm (this compares to a national average of ca. £8000 psm for Co-op foodstores). This would indicate that, for this format, stores would need to be in the region of 1900+ sq m GIFA to be viable.

4.16 Reflecting these factors this would indicate that the minimum size for a mid-sized supermarket to be viable would require a similar sized unit and site to that identified above for a discount foodstore i.e. a *minimum* of ca 1600-1700 sq m GIFA and a site of at least 0.65ha.

Non-Food Discounter

4.17 There are typically two formats for non-food discounters – smaller stores within town centres and also within some retail parks and larger retail park/out-of-centre formats which have a wider offer, often including garden centres. The current proposal is appropriate only for the larger format which would complement the range of retail already located in the Easlea Road area (including the SERP). The following indicates the requirements for operators for this type of unit:

- B&M – up to 3250 sq m GFA, direct access to surface level parking (minimum 1858 sq m GFA).
- TJ Morris (Home Bargains) – currently seeking 2322-3716 sq m units, on sites of 0.8ha or larger with surface level parking.
- The Range – units in excess of 1858 sq m and sites greater than 1.2 ha

4.18 Taking the minimum requirements for a viable unit consistent with a flexible approach for the proposed type of retail use implies that this would require a minimum unit size of ca. 1750 sq m on a site of at least 0.7ha for new build. In other words the requirements are very similar to Options A & B.

Summary

4.19 The applicants have adopted a flexible approach in identifying potential retail operations and formats within the application site. Having considered these the *minimum* requirements for any of these options is the following:

- Unit size: ca. 1500 sq GIFA (food discounter) and slightly larger for other format options.
- Direct access to free, surface level car parking.
- Clear and level floorplate for the direct delivery of goods to the shop floor.
- Minimum site area for new development: 0.65ha.

Review of Potential Premises and Sites

4.20 West Suffolk Council officers have identified a range of potential sites and premises that need to be addressed in the sequential assessment. These are set out in the Scoping Note at Appendix A. The following considers the suitability and availability of these sites.

1. Town Centre Premises

4.21 Table 4.1 identifies all available premises within, or on the edge of, Bury St Edmunds City Centre. These have been identified through a comprehensive review of all commercial agents marketing premises within the City Centre as well as those listed in the Estates Gazette Property Link (which, it should be noted, does not identify all the properties listed in Table 4.1). It should be noted that both units at Robert Boby Way and 29 Buttermarket/High Baxter Street premises are also being marketed but these are addressed separately below.

Table 4.1: Premises Marketed in Bury St Edmunds City Centre/Edge of Centre

ADDRESS	AGENT	NFA	GFA	FLOORS	ON SITE PARKING	LOCATION	USES	
19 Abbeygate	McKinnon Nelson		114	Under Offer	1	No	TC	Sui generis pp; potential for A1-A4
59 Abbeygate Street	Fleurets		520	To Let	1	No	TC	Café Rouge
2 Baxter Court, High Baxter St	Merrifields		18	To Let	1	No	TC	Retail
7 Buttermarket	Hazells	13 (2 floors)	189	To Let	3	No	TC	
12 Buttermarket	Merrifields		315	To Let	4	No	TC	GF 105 sqm; Grade II Listed
36B Buttermarket	Kearney Bell		146	To Let	1	No	TC	Former EWM
42/42A Buttermarket	Francis Darrah	137	237	To Let	2	No	TC	Game
22-23 Churchgate Street	Hazells	62	78	To Let	2	No	TC	
The Lexicon, Cornhill	Eddisons	327	357	To Let	2	No	TC	
Market Cross, Cornhill	Merrifields		226		2	No	TC	Grade 1 Listed
5 Garland Sstreet	Hazells	46	56	To Let	1	No	TC	
Hatter Street	Marshall Buck & Cas	23	117	For sale	3	No	TC	Grade II listed
9 Hatter Street	Merrifields		50	To Let	1	No	TC	Retail
15A Hatter Street	Merrifields		23	To Let	1	No	TC	Retail
27 Hatter Street	Merrifields	45	137	To Let	4	No	TC	GF45; 1st F 32 sqm; 2nd F 18 sqm; Basement 42 sqm
17 Langton Place	Lacy Scott & Knight		51	To Let/For Sale	1	No	TC	Business for sale or just lease
11-13 Risbygate	Lacy Scott & Knight	441	140	To Let/For Sale	1	No	TC	PP for conversion to 9 flats and 2 shops
83-87 Risbygate Street	Hazells		188		2	No	TC	Office (primarily)
99 Risbygate Street	Hazells		67	Under Offer	1	No	TC	
59-61 St Andrews Street	Lacy Scott & Knight		100	To Let/For Sale	1	No	TC	
20 St Johns Street	Hazells	41	43	Under Offer	1	No	TC	
65 St Johns Street	Hazells	41	74	To Let	3	No	TC	Grade II listed
90 St Johns Street	Merrifields	234	459	To Let	3	No	TC	GF Retail - 338 sq m; 1st + 2nd offices 117 sq m GFA
Unit 28 The Arc			93			Yes (close by)	TC	NB Units 5, 18A, 19A and 35
10 The Traverse	Merrifields		83	To Let/For Sale	2	No	TC	GF Retail/1st Floor resid. GF retail 56.5 sqm
11 The Traverse	Merrifields		109	To Let	3	No	TC	GF retail 59.6 sq m; Estate agent

- 4.22 Examination of Table 4.1 shows that there are no available units within the City Centre/Edge of Centre that meet the minimum floor requirements for the proposed retail units. There are, therefore no suitable and available premises within the City Centre.
- 4.23 The following tables set out the characteristics and conclusions regarding the availability and suitability of other sites referred to the Council's scoping note.

2. Vacant Units, Robert Boby Way

TITLE	2. Robert Boby Way
LOCATION	Bury St Edmunds City Centre
CATEGORISATION	Town Centre
OWNERSHIP	Private
AVAILABILITY	Actively being marketed by Edgerley Simpson Howe for site owners. Premises should be regarded as available.
SUITABILITY	<p>1. Catchment Population Located in Bury St Edmunds City Centre – well located for catchment area to be served</p> <p>2. Size/Floor Area/Layout Two units 465 sqm and 743 sq m respectively – combined 1208 sq m GFA. Premises are smaller than minimum requirement for viable units for either of the three development options identified for the proposal.</p> <p>3. Access to car parking Direct access to surface level parking available.</p> <p>4. Site Prominence/ Location/Market attractiveness Location within City Centre provides generally attractive with good access from main arterial routes.</p> <p>5. Customer Accessibility Good accessibility by range of public transport modes and by private car.</p> <p>6. Other Factors No significant other constraints or opportunities.</p>
CONCLUSION	Site is unsuitable for proposed retail development (all options).

3. Vacant Premises, High Baxter Street (Former Argos)

TITLE	3. High Baxter Street/Buttermarket
	
LOCATION	Bury St Edmunds City Centre
CATEGORISATION	Town Centre
OWNERSHIP	Private
AVAILABILITY	Actively being marketed by Merrifields and Francis Darrah in two parts following internal alterations to unit. Premises should be regarded as available.
SUITABILITY	
7. Catchment Population	Located in Bury St Edmunds City Centre – well located for catchment area to be served
8. Size/Floor Area/Layout	<p>Front part: 29 Buttermarket – two floors – ground 374 sq m and first 116 sq m (490 sq m total). Rear part: 4 floors granted pp for residential use – 1265 sq m GFA.</p> <p>Floor area spread over 4 floors renders unit unviable for proposed development (max single floor area is 374 sq m). Layout obstructed by supporting structures and different levels.</p>
9. Access to car parking	Limited on street parking only.
10. Site Prominence/ Location/Market attractiveness	Location within City Centre provides generally attractive with high profile for Buttermarket unit in particular.
11. Customer Accessibility	Good accessibility by range of public transport modes. Limited access by private car.
12. Other Factors	Located within City Centre Conservation Area.
CONCLUSION	Site is unsuitable for proposed retail development (all options).

4. Cornhill Centre, Cornhill Walk

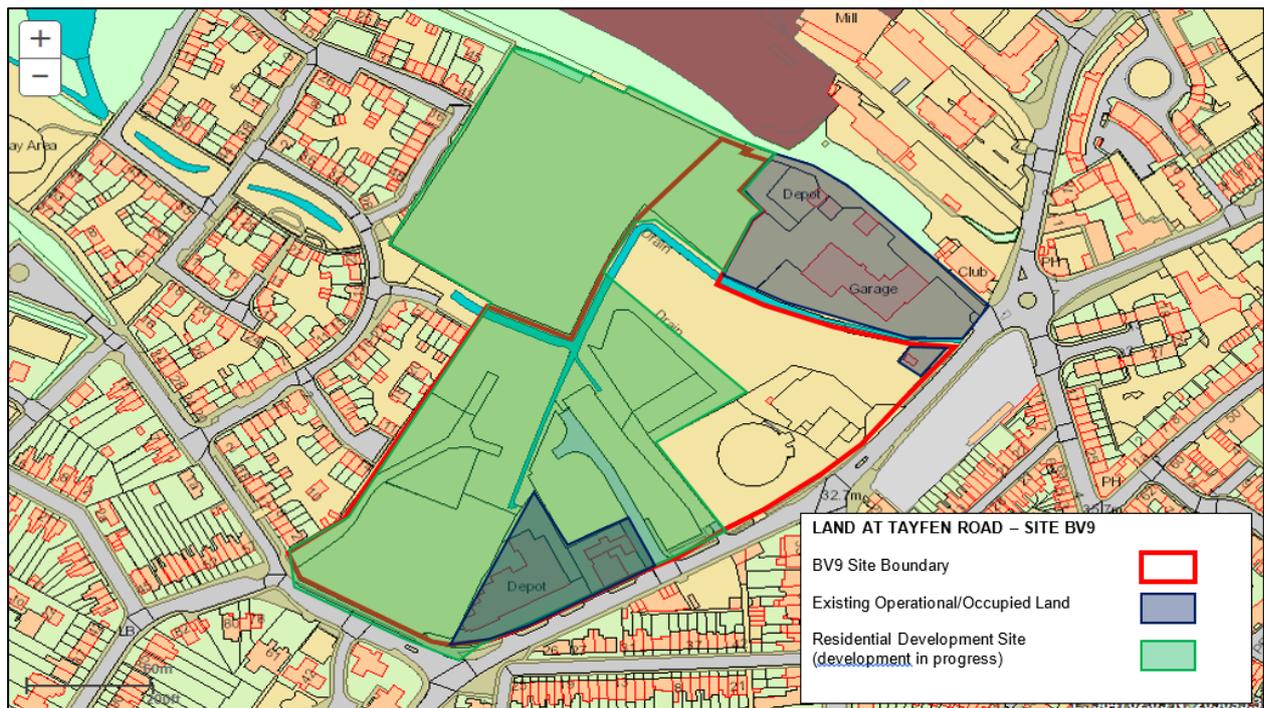
TITLE	4. Cornhill Centre, Cornhill Walk
	
LOCATION	Bury St Edmunds City Centre
CATEGORISATION	Town Centre
OWNERSHIP	Private – Knightspur Homes
AVAILABILITY AND GENERAL COMMENT	<p>Planning application refused and appeal dismissed for ground floor retail/leisure and three upper floors of residential development. Refused plans identified three ground floor units: retail units 630 sq m & 348 sq m; retail/gym unit 563 sqm.</p> <p>Application refused on grounds of scale/massing of building including impact on appearance and character of Conservation Area and nearby residential premises.</p> <p>The report to Committee identified that planning officers supported both the principle of the development and the retail/gym proposals. However, the proposal was refused planning permission and dismissed at appeal on the grounds of impact on Conservation Area and adverse impact on amenity of nearby residential dwellings.</p> <p>At present not known about owners' intentions re future of site. There is no indication that the site would become available which is reinforced by the appeal decision that the principle of the proposal is acceptable but that the detailed design and overall scale proposed was not.</p> <p>Site cannot be considered to be available.</p>

SUITABILITY	
13. Catchment Population	Located in Bury St Edmunds City Centre – well located for catchment area to be served
14. Size/Floor Area/Layout	<p>Rejected scheme has potentially three units totalling 1541 sq m but layout and configuration results in units providing only the minimum floorspace for Options 1 and 2 only and too small for Option 3.</p> <p>Total site area 0.38 ha. Too small for redevelopment for either option.</p> <p>The loading bay with the proposed scheme can only accommodate a maximum length vehicles of up to 9.8m whereas lorries serving the proposed development would be up to 16.5m in length (indeed these would find the access route to the development very difficult to negotiate).</p>
15. Access to car parking	No access to parking for customers. Vehicular access for deliveries via one-way system through residential streets – Short Brackland is relatively narrow.
16. Site Prominence/ Location/Market attractiveness	Location within City Centre provides generally attractive.
17. Customer Accessibility	Good accessibility by range of public transport modes but not by private car.
18. Other Factors	Location in Conservation Area. Immediately adjacent to residential properties.
CONCLUSION	Site is unsuitable and unavailable for proposed retail development (all options).

5. Land at Tayfen Road (Site BV9)

- 4.24 The location of site BV9 at Tayfen Road as identified in the 2015 Bury St Edmunds Town Centre inset is identified in Figure 4.2. This also identifies existing occupied premises and the existing residential development site (original planning application ref DC/15/0689/OUT with numerous discharge of conditions applications). The central part of the site is in the ownership of National Grid and comprises part of the former gas works, including base of former gas holder.
- 4.25 A number of documents have proposed that the Tayfen Road site would be suitable for, in part, retail development. As a result, this section considers the characteristics of this site in more detail than the other sites.

Figure 4.2 Land at Tayfen Road



Site Description

4.26 The Tayfen Road site lies to the north and west of Tayfen Road. At June 2021 the site comprises the following:

- Residential development site – in accordance with consent DC/15/0689/OUT and subsequent discharge of conditions applications. This is identified in green in Figure 4.2 and extends to the north west of BV9.
- In the southern part of the residential site two commercial businesses are continuing their activities – a car wash business and tyre/exhaust fitting garage.
- In the eastern corner of the site a small area (ca. 200 sq m) is for operational plant (Cadent Gas Ltd). However, the location of this effectively sterilises ca. 500 sq m of the site (0.05ha).
- Passing through the centre of the site are a series of drainage channels including Tayfen Water.

4.27 The total area of site BV9 is ca. 4.06ha. However, the net remaining area available for development (i.e. excluding the housing development site, drainage channels and operational area is 1.05ha. The site has an irregular configuration and part of the NG site is affected by a pipeline easement.

Availability of Site

4.28 Most of the site is either undergoing active redevelopment or is in active/operational use. The remaining part comprises land owned by National Grid (former gas works part of the site). This site has, until recently been marketed by BNP Paribas, however, it is no longer being advertised on the market. The total site area (including drains, Cadent Gas land, etc) was identified as 1.17ha. The closing date for offers for the property expired on 4th June 2021. The property has since been removed from the BNP Paribas website but remains on the National Grid Property portal although this confirms that offers were required to be received by 4th June 2021.

- 4.29 At this time the site is not available to new purchasers although it is recognised that expressions of interest may have been submitted for the site.

Development Constraints.

- 4.30 The site has two major development constraints: contamination and flood risk.

Contamination

- 4.31 The Tayfen Road site was used as part of the town gas works the main part of which was located on the east side of Tayfen Road in the 19th and 20th centuries. This is confirmed in the property particulars that were posted by BNP Paribas prior to their removal in mid-June and also from OS map records.

- 4.32 The production of 'Town Gas' was a complex, multi-stage process that varied from site to site. The contaminants on a site depend largely on the history of the site and the type of materials that were produced on it. Many by-products and waste materials were produced as a result of gas manufacture. These included coal tars, oils, sludges, purifier wastes (spent oxide and foul lime), ash, coal dust, coke and ammoniacal liquors. Typical contaminants of interest at gasworks sites include:

- Inorganic compounds incl.: ammonia; cyanide etc
- Metals and metalloids: including arsenic; aluminium; cadmium; mercury etc
- BTEXs: e.g. benzene; toluene
- Phenolics: Phenol and others
- Polycyclic aromatic hydrocarbons (PAHs) Gas works of the type located at Tayfen Road are normally associated with high levels of contamination. These include:

- 4.33 At this stage it is not known what contaminants are present at the National Grid part of the Tayfen Road site. An examination of the various planning documents¹ that have proposed redevelopment of the site has not indicated that there has been any intrusive ground conditions surveys or remediation undertaken for the gas works in this area. This is different from the remaining parts of the site, and the Tayfen Road Masterplan (Pigeon/Paladin Ventures 2016) noted that, under the heading of contamination noted that "A Phase 1 contamination report has been prepared together with a geo-technical assessment for all the site except the land occupied by the National Grid/Transco". However, the same reported identified a range of contaminants in the land adjacent to the gas works site including a range of soil contamination:

A geo-environmental assessment has identified soil contamination that includes some metals, cyanide, total petroleum hydrocarbons (TPH) and polycyclic aromatic hydrocarbons (PAH) above generic assessment criteria relevant to the future residential land use. Central parts of the site, in the area of a former depot (north of the adjacent gasholder), are mostly affected.

¹ Documents examined are: Tayfen Road Masterplan (pigeon Paladin Ventures, 2016); Bury Vision; SERLS; Tayfen Road Concept Statement

- 4.34 Given the history of the site and the above findings it is therefore highly likely that the National Grid part of the site is significantly contaminated which will need remediation prior to redevelopment.

Flood Risk

- 4.35 Much of the Tayfen Road site, in particular the northern part of the National Grid part of the site is at medium risk (Flood Zone 2) of flooding from rivers. Figure 4.3 provides the relevant extract from the Government's flood warning information service.

Figure 4.3: Tayfen Road Fluvial Flood Risk



- 4.36 Government policy in relation to development in areas at risk from flooding is the adoption of a sequential test the aim of which is to steer new development to areas away from flooding i.e. to Flood Risk Zone 1. This does not mean that it is not possible to develop in Flood Zone 2 but that development should be directed to reasonably available sites in Flood Risk Zone 1 (i.e. low and very low risk). The application site is in Flood Risk Zone 1.

- 4.37 The area of the site excluding the Zone 2 flood area is approx. 0.65ha i.e.at the minimum for accommodating the proposed development for Options 1 and 2 and below the minimum for Option 3.

Categorisation of Tayfen Road Site

- 4.38 Both the Scoping Note provided by West Suffolk officers and the SERLS suggest that the Tayfen Road site should be considered to be an edge-of-centre site in terms of the sequential approach. This categorisation of the site is not valid when examined against the definition of edge-of-centre sites set out in NPPF and advice in

Government Guidance – the site should be correctly identified as an out-of-centre site. This reflects a number of factors:

- The actual distance from the nearest point of the developable/available part of the Tayfen Road site (i.e. the gas works site, is:
 - to town centre boundary – 170m
 - to nearest part of Primary Shopping Area – 220m
 - to nearest Primary Shopping Frontage – 405m

However, the policy in the NPPF refers to the distance from the *location* and not the edge of a potential site. For any of the proposed development formats that are being considered for the application site there will be a significant area of car parking as well as landscaping and pedestrian areas between the store and the site boundary. It is, therefore, entirely reasonable to consider that the actual distance between the location and the points identified above will be higher. If one considers the central point of the National Grid part of the site this would increase the distance for pedestrians by approximately 50m (of course the actual distance will depend on the layout of the development). This would result in the distance to the nearest part of the Primary Shopping Area to be ca. 270m. This is below the maximum 300m identified in NPPF but, as noted above, this 300m figure would be appropriate in the largest City Centres whereas an appropriate distance for Bury St Edmunds would be less than 250m.

4.39 Furthermore, there are local circumstances that would indicate that this distance of 220m (or 270m) would not be reasonable for considering the site to be edge-of-centre:

- Pedestrians would need to cross Tayfen Road. This is a major arterial route which, for many pedestrians, will be difficult to cross during the day without dedicated crossing facilities. The introduction of crossing facilities would ease access across the road but result in delays to pedestrians waiting for the crossing lights to stop traffic, in effect increasing the real journey time/length between the site and the City Centre.
- There is a significant levels difference between the Tayfen Road site and the town centre. The nearest part of the site is ca 33m AOD whereas the bus station is 47m AOD and the junction of Risbygate Street/St Andrew's Street North is almost 50m AOD. This is a significant increase in height with a sustained incline over a considerable distance. This will present a major barrier to less-mobile members of the community including the elderly and shoppers encumbered with young children.
- Between the town centre boundary and the site uses along St Andrew's Street north are predominantly residential. There is a clear change in character which would confirm that the character of the Tayfen Road site is not on the edge of the town centre. This will be reinforced with the completion of the residential development on the remainder of the Tayfen Road site which will result in the replacement of the existing commercial properties with new housing/nursing home and additional residential properties.
- Due to the intervening residential uses and gradient there is no intervisibility between the Tayfen Road site and the town centre. This reinforces the fact that there is clear separation between the Tayfen Road site and the town centre.

4.40 Taking all of these factors together, along with the distance between the nearest part of the Tayfen Road site (National Grid part) and the town centre it is quite clear that, in terms of the description of edge-of-centre sites provided in the NPPF, and lack of any guidance in the development plan, the conclusion has to be that the Tayfen Road site cannot reasonably be considered to be an edge-of-centre site, rather it is an Out-of-Centre site.

4.41 As such there is no sequential preference for any part of the Tayfen Road site compared to the application site.

Conclusions

4.42 The review of the Tayfen Road site has demonstrated that:

- Most of the site is in the process of development for residential/care home use. The only part available is the majority of the National Grid/former gas works site.
- The gas works site has been on the market but is currently no longer available.
- The gas works site has major development constraints, in particular associated with ground contamination associated with its former use as a gas works and from flood risk (Zone 2).
- Having examined the site in terms of the definition of edge-of-centre sites set out in NPPF it is clear that the Tayfen Road site (BV9) is an **out-of-centre site and there is no sequential preference for this site compared to the application site** in accordance with Policy DM35 of the West Suffolk Joint Development Management Policies Document (2015), the NPPF and Government Guidance.

Conclusions

4.43 The applicants have carefully considered potential alternative sites and premises for the proposed development in accordance with the requirements of the sequential approach/test set out in the Development Plan and NPPF and in accordance with the interpretation of this policy provided in legal decisions. The review of these alternatives has demonstrated clearly that there are no sequentially preferable sites in Bury St Edmunds for the proposed development. It is, therefore, concluded that the proposal fully satisfies the requirements of the sequential approach.

5 Summary and Conclusions

Introduction

- 5.1 This Retail Impact Assessment ("RIA") and sequential assessment sets out information in support of the planning application submitted for a change of use planning application for the existing Sports Direct Gym at Easlea Road, Bury St Edmunds.
- 5.2 The unit has a gross internal floor area of 1667 sq m. At the present time no specific operators have been agreed for the proposed retail unit but there has been strong interest for both convenience and comparison goods retail from the unit. The principal characteristics of the proposed retail format is the provision of a large floorplate unit suitable for a range of potential retail uses such as a discount or mid-sized supermarket, a general (non-food) discounter or a large bulky goods retail unit. Reflecting this the application seeks unrestricted Class E (Retail) use in the unit.

Retail Impact Assessment

- 5.3 A retail impact assessment has been prepared for the proposed development which has been undertaken in line with good practice and has assessed the following:
- The characteristics of existing retail provision and available expenditure within the primary catchment area for the proposed development.
 - The proposed development in terms of: floorspace; turnover; trade draw and trade diversion.
 - Retail impact measured in terms of percentage loss of trade in 2023 taking into account changes between 2021 and 2023.
 - The vitality and viability of Bury St Edmunds City Centre and other retail locations within the town.
 - The assessment has taken into account the cumulative effects arising from retail development that has occurred since the completion of the 2016 St Edmundsbury Retail and Leisure Study.
- 5.4 The RIA demonstrates that the scale of impact arising on existing town centres will be very low and will not undermine the vitality or viability of the City Centre or any existing centre.

Sequential Approach

- 5.5 A full assessment of potential alternative sites in accordance with the requirements of the sequential approach has been undertaken as set out the NPPF and line with recent legal decisions. This demonstrates that the proposal fully meets the requirements of the sequential approach. The assessment has shown that:
- There are no premises available within or on the edge of the City Centre that meet the minimum requirements for a viable retail development of the types proposed for the application site. This includes the vacant units at Robert Boby Retail Park and High Baxter Street.

- The Cornhill Walk site is not available, is too small to accommodate the minimum development, would be unsuitable in terms of lack of car parking and servicing access, and is in a sensitive location both in terms of its location in the Conservation Area and adjacent residential properties.
- Only a limited part of the Tayfen Road site is potentially available (although it is not being advertised as available at the current time) and the site has major development constraints including contamination and flooding. The site does not satisfy the definition of an edge-of-centre site as set out in the NPPF. As such it is not sequentially preferable to the application site.

Conclusion

5.6 This report demonstrates that the proposed development meets the requirements of the policies in the development plan, the NPPF and other material considerations, relevant to the retail impact of the proposed development and application of the sequential approach:

- The proposal will not result in a significant individual or cumulative adverse impact on the vitality and viability of the City Centre or other retail location; and
- The proposal fully satisfies the requirements of the sequential approach/test.

Appendix A: Scoping Note

Planning application DC/21/0427/FUL - Sports Direct Fitness, Easlea Road, BSE

Scoping note for retail impact and sites to sequentially test

Impact assessment

- To align with the St Edmundsbury Retail and main town centre use study 2016 using up to date data.

[Microsoft Word - 170119 St Eds RLS Final Report \(westsuffolk.gov.uk\)](#)

- Have regards to Bury St Edmunds Town Centre Master Plan adopted Dec 2017

[BSE-TC-Masterplan-December-2017.pdf \(westsuffolk.gov.uk\)](#)

- Take account of planned investment in Bury St Edmunds town centre at 17-18 Cornhill

<https://www.westsuffolk.gov.uk/community/cornhill/index.cfm>

- Cumulative impacts of recent large scale retail developments undertaken since the Retail and Main Town Centre use study 2016

Should have regard to the impact of the development of The Range and B and M store, in out to centre location at Western Way, BSE. Scheme is open. DC/16/0508/FUL (retail units) and DC/17/0623/FUL (mezzanine floor, cafe and garden centre)

Planning permission for extension to Glasswells out of town. DC/19/0325/VAR Variation of condition 3 of SE/08/1404 - To allow the increase of the retail floor area from 6,425 sqm to 7,424 sqm (an increase of 999 sqm).

Sites to sequentially test – see table below

Site	Address	TC/Edge of Centre/Out of Centre	Vacant/previous occupier	Floorspace where known	Commentary
1.	Land at Tayfen Road (Bury St Edmunds Vision 2031 local plan - policy BV9)	Edge of Centre	Vacant		Allocated for mixed use in local plan including deep discounter food store. Currently being marketed.  Tayfen Road, Bury St Edmunds - BNPPRE P.
2.	Unit at Robert Bobby Way, BSE	In Primary Shopping Area and	Vacant unit, previous occupier PC World	1500sq m circa	vacant, lies within a retail park with car parking, within easy walking

		town centre			distance of town centre.
3.	High Baxter Street, BSE	Within Local Plan Primary Shopping Area and Town Centre boundary	Vacant/formerly Argos store	10178 Sq Ft (source property link)	Has been vacant since Argos relocated to within Sainsburys out of town store. For sale Merrifields Property For Sale High Baxter Street, Bury St. Edmunds, Suffolk Propertylink (estatesgazette.com)
4.	Cornhill centre, Cornhill Walk, BSE	Within Local Plan Primary Shopping Area and Town Centre boundary	Vacant		Vacant shopping centre
5.	Other sites currently being marketed including from Property link website https://propertylink.estatesgazette.com/				

Note prepared by West Suffolk Strategic Planning Policy Team – 07/05/2021

Appendix B: Bury St Edmunds Surveys – June 2021

RETAIL SURVEY - GOAD CLASSIFICATION

LOCATION: BURY ST EDMUNDS AREA

DATE: 9th June 2021

	Area/Count			Area/Count	
	Bury St Edmunds City Centre			Town Location	
	No.	Multiples		No.	Multiples
Convenience	29		Retail Service	62	
Bakers & Confectioners	5	Hotel Chocolat	Clothing & Fancy Dress Hire		
Butchers	3		Dry Cleaners & Launderettes	2	
CTN	3	Tesco Exp	Filling Stations		
Convenience Stores	2		Health & Beauty	44	
Fishmongers			Opticians	7	Spesavers; Vision Express; Boots
Frozen Foods	2	Iceland	Other Retail Services		
Greengrocers			Photo Processing		
Grocers & Delicatessens	4	Holland & Barrett	Photo Studio		
Health Foods	1		Post Offices		
Markets			Repairs, Alterations etc	4	
Off Licences	3		Travel Agents	5	
Shoe Repairs Etc	2	Timpson (2)	TV, Cable & Video Rental		
Supermarkets	1	Waitrose	Vehicle Rental		
Ecig	3		Vehicle Repairs & Services		
Comparison	155		Video Tape Rental		
Antique Shops	3				
Art & Art Dealers	9		Other Retail Outlets		
Booksellers	2	Waterstones (2)			
Carpets & Flooring	2		Leisure Services	98	
Catalogue Showrooms			Bars & Wine Bars	10	
Charity Shops	11		Bingo & Amusements		
Chemist & Drugstores	8	Savers; Superdrug; Boots	Cafes	28	
Childrens & Infants Wear	1		Casinos & Betting Offices	2	
Clothing General			Cinemas, Theatres etc	2	
Crafts, Gifts, China & Glass	5		Clubs		
Cycles & Accessories	3		Disco, Dance & Nightclubs	1	
Department & Variety Stores	2	M&S; TK Maxx	Fast Food & Take Away	13	Greggs (2)
DIY & Home Improvement	1		Hotels & Guest Houses	not rec	
Electrical & Other Goods	11	O2; EE; Three; Hughes; Vodafone	Public Houses	7	
Florists	4		Restaurants	34	
Footwear	5	Jones; Clarks; ShoeZone	Sports & Leisure Facilities		
Furniture Fitted	1		Other Leisure Services	1	
Furniture General	1		Financial & Business Services	51	
Gardens & Equipment			Building Societies	2	
Greeting Cards	2	Card Factory; Clintons	Building Supplies & Services	1	
Hardware & Household Goods	7	Wilko; Poundland	Business Goods & Services		
Jewellery, Watches & Silver	11	Pandora; H Samuel	Employment & Careers	4	
Ladies & Mens Wear & Acc.	11	Superdry; Joules; Fat Face; Crew Clothing; River Island; Next; Hobbs; Bon Marche; Peacocks; New Look;	Financial Services	7	
Ladies Wear & Accessories	20	Accessorise; Monsoon; Claires, Whitestuff; Phase 8 Jigsaw	Legal Services	5	
Leather & Travel Goods	1		Other Business Services	2	
Mens Wear & Accessories	4		Printing & Copying		
Music/Musical Instruments	1		Property Services	23	
Music & Video Recordings	1		Retail Banks	7	
Newsagents & Stationers	6	Rymans; The Works; WH Smith			
Office Supplies			Vacant Outlets	54	
Other Comparison Goods	4	Smiggle	Vacant Retail & Service	54	
Photographic & Optical					
Secondhand Good etc	2				
Sports, Camping & Leisure	6	JD Sports; Costwold; Sports Direct; Blacks; Mountain Warehouse			
Telephones & Accessories					
Textiles & Soft Furnishings					
Toiletries, Cosmetics etc	2	Perfume Shop; L'Occitane; Bodyshop			
Toys, Games & Hobbies	6	Game			
Vehicle & Motorcycle Sales	1				
Vehicle Accessories	1	Halfords			

RETAIL SURVEY - GOAD CLASSIFICATION

LOCATION: ST EDMUNDS AREA

DATE: 9th June 2021

	Area/Count		Area/Count		Area/Count	
	Bury St Edmunds St Edmundsbury Retail Park		Bury St Edmunds Remainder Easlea Road Area		Bury St Edmunds Western Way Area	
	No.	Multiples	No.	Multiples	No.	Multiples
Convenience						
Bakers & Confectioners						
Butchers						
CTN						
Convenience Stores						
Fishmongers						
Frozen Foods						
Greengrocers						
Grocers & Delicatessens					2	Aldi; Asda
Health Foods						
Markets						
Off Licences						
Shoe Repairs Etc						
Supermarkets						
Comparison						
Antique Shops						
Art & Art Dealers						
Booksellers						
Carpets & Flooring	2	Tapi; Carpetright	1			
Catalogue Showrooms						
Charity Shops						
Chemist & Drugstores						
Childrens & Infants Wear						
Clothing General						
Crafts, Gifts, China & Glass						
Cycles & Accessories						
Department & Variety Stores						
DIY & Home Improvement	1	Homebase	2	Topps Tiles		
Electrical & Other Goods	1	Currys/PC World				
Florists						
Footwear						
Furniture Fitted			1			
Furniture General	3	DFS; Bensons; Dreams	1		1	
Gardens & Equipment						
Greeting Cards						
Hardware & Household Goods	2	Dunelm; Home Bargains			2	The Range; B&M
Jewellery, Watches & Silver						
Ladies & Mens Wear & Acc.			1	Matalan		
Ladies Wear & Accessories						
Leather & Travel Goods						
Mens Wear & Accessories						
Music/Musical Instruments						
Music & Video Recordings						
Newsagents & Stationers						
Office Supplies						
Pets	1	Pets @ Home				
Photographic & Optical						
Secondhand Good etc						
Sports, Camping & Leisure						
Telephones & Accessories						
Textiles & Soft Furnishings						
Toiletries, Cosmetics etc						
Toys, Games & Hobbies						
Vehicle & Motorcycle Sales						
Vehicle Accessories						

Appendix C: Bury St Edmunds City Centre –
Goad Survey Jan 2021



Goad Category Report

Bury St Edmunds

Survey Date: 26/01/2021



GETTING THE MOST FROM YOUR GOAD CATEGORY REPORT

Each shopping centre has its own unique mix of multiple outlets, independent shops, convenience and comparison stores, food outlets and vacant premises.

Understanding the retail composition of a centre and its effect on local consumers is crucial to the success of any business. By studying the information in the report, you will be able to examine site quality, evaluate threats opportunities, and assess the vitality and viability of the centre. However, you will only achieve this if you are aware of the various implications of the data that you see. This guide is designed to help you interpret the information you see on the Goad Category Report.

1. The Local Area

When evaluating the quality of a site, it is often beneficial to compare it with other local shopping centres. Category Reports are available for the majority of retail centre that we map.

2. The Indexing System

A simple indexing system appears throughout the report. This illustrates the difference between a percentage figure for the centre and the UK average. An index of 100 represents an exact match, anything less than 100 indicates a below average count for the centre, and a figure over 100 represents an above average count.

For example, if restaurants accounted for 10% of a centre's outlets and the UK average was also 10%, the index would be 100. If however, the UK average was 8%, the index would be 125.

The index is an effective gap analysis tool and can be used to identify areas that are under and over represented within a centre. A retail category that is heavily under represented could indicate poor local demand. On the other hand, it could show that there is an untapped market waiting to be serviced. Either way, it provides a strong indication that the site will need to be examined further.

3. Floor Space

The floor space figures shown on the report are derived from the relevant Goad Plan, but only show the footprint floorspace, and the site area without the building lines. They should not therefore be read as a definitive report of floor space, but do provide a useful means of

comparison between centres, as all outlets are measured in a consistent manner.

4. Vacant Outlets

Comparing the number of vacant outlets with the GB average provides a useful insight into the current economic status of a centre. For example, a high index generally represents under-development or decay, while a low index shows a strong retail presence.

5. Multiple Outlets/Major Retailers

A multiple retailer is defined as being part of a network of nine or more outlets. The presence of multiple outlets can greatly enhance the appeal of a centre to local consumers. The strong branding and comprehensive product mix of retailers such as Marks & Spencer, Boots and HMV are often sufficient in itself to attract consumers to a centre. 30 national multiples have been identified as Major Retailers, (i.e. those retailers most likely to improve the consumer appeal of a centre).

The presence of multiple outlets and major retailers can have a significant impact on neighbouring outlets. While other retailers will undoubtedly benefit from increased pedestrian traffic, (and therefore increased sales opportunities), multiples provide fierce competition for rivals in their retail categories.

Also available from Experian

The Goad Centre Report

This defines the retail extent and composition of a centre; showing the number of premises in over 27 retail categories and detailing the space allocation across each of them. A comparison of these figures with the national average illustrates under or over representation by category, allowing you to assess the degree of competition or opportunity within the centre.

The Goad Distribution Report

Goad Distribution Reports provides a top-level analysis of the total retail mix and composition of a centre. It shows the number of premises in 16 categories and details the space allocation across each of them.

Retail Planner

Retail Planner is a service for retail planners, property consultants and retailers, providing comprehensive, up-to-date information for retail planning related decisions. Specifically we provide data for three different types of expenditure: Comparison, Convenience and Leisure. Each category is broken down into the European standard COICOP (Classification of Individual Consumption by Purpose) classification. Data is available at output area and postal sector levels. We can also provide data for predefined areas such as Local Authority District Boundaries.

Goad Paper Plans

These provide a bird's eye view of over 1,250 UK retail centres. The name, retail category, floor space and exact location of all outlets and vacant premises is recorded and mapped. Key location factors such as pedestrian zones, road crossings, bus stops and car parks are also featured. There are also over 800 retail park plans available.

Goad Digital Plans

Digital plans are available online through our Goad Network system. This enables the user to View, Interrogate Edit & Print plans to their own requirements. For a demonstration logon to <http://www.goadnetwork.co.uk/demologin.asp>

Tailored Plans and Extracts

We are able to provide tailored plans and extracts which highlight the information most relevant to your enquiry.

The Retail Address Database

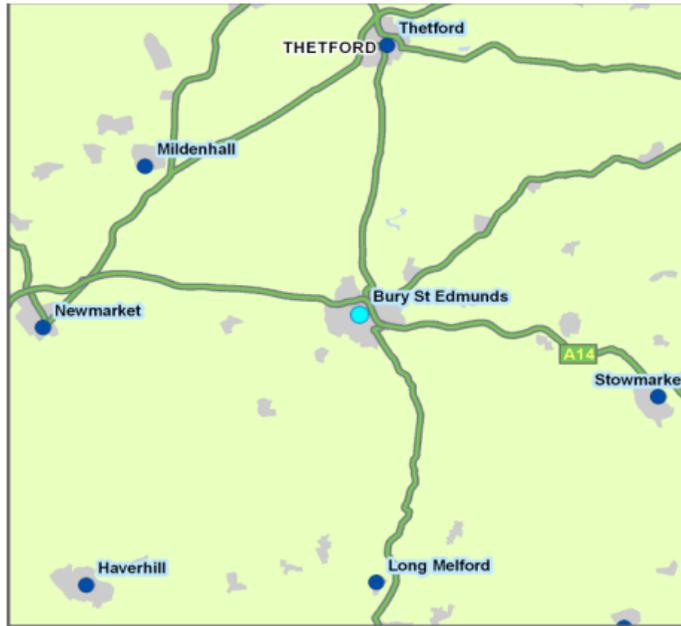
An extensive database covering the addresses of 360,000 retail outlets across the UK, this is a highly effective tool for site evaluation and competitor analysis.

For further details on these products or if you have any queries regarding your Goad Category Report, please contact Experian on: Tel: 0845 601 6011

Fax: 0115 968 5003 E-mail: goad.sales@uk.experian.com

Nearest Centres and Major Retailers

Bury St Edmunds



Nearest Location	Distance KM
Mildenhall	17.47
Long Melford	18.65
Thetford	18.83
Stowmarket	20.40
Newmarket	20.82

Major Retailers Present

Department Stores		Clothing	
Debenhams	1	Burton	0
House of Fraser	0	Dorothy Perkins	0
John Lewis	0	H & M	1
Marks & Spencer	1	Monsoon Accessorize	2
		New Look	1
		Next	1
		Primark	0
		River Island	1
		Topman	1
		Topshop	1
Mixed Goods Retailers		Other Retailers	
Argos	0	Carphone Warehouse	1
Boots the Chemist	1	Clarks	1
T K Maxx	0	Clintons	1
W H Smith	1	EE	1
Wilkinson	1	H M V	0
		O2	1
Supermarkets		Superdrug	1
Sainsburys	0	Vodafone	1
Tesco	1	Waterstones	2
Waitrose	0		

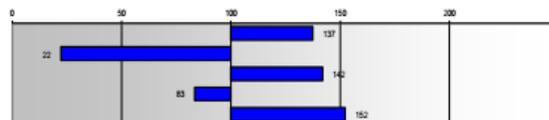
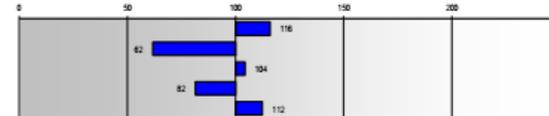
Multiple Counts & Floorspace by Sector

Counts	Outlets	Area %	Base %	Index
Comparison	65	48.15	41.53	116
Convenience	10	7.41	11.98	62
Retail Service	14	10.37	9.94	104
Leisure Services	25	18.52	22.72	82
Financial & Business Services	21	15.56	13.84	112

Total Multiple Outlets 135

Floorspace Sq Ft	Outlets	Area %	Base %	Index
Comparison	245,700	62.92	45.77	137
Convenience	22,000	5.63	25.40	22
Retail Service	20,400	5.22	3.68	142
Leisure Services	57,200	14.65	17.56	83
Financial & Business Services	45,200	11.57	7.60	152

Total Multiple Floorspace 390,500

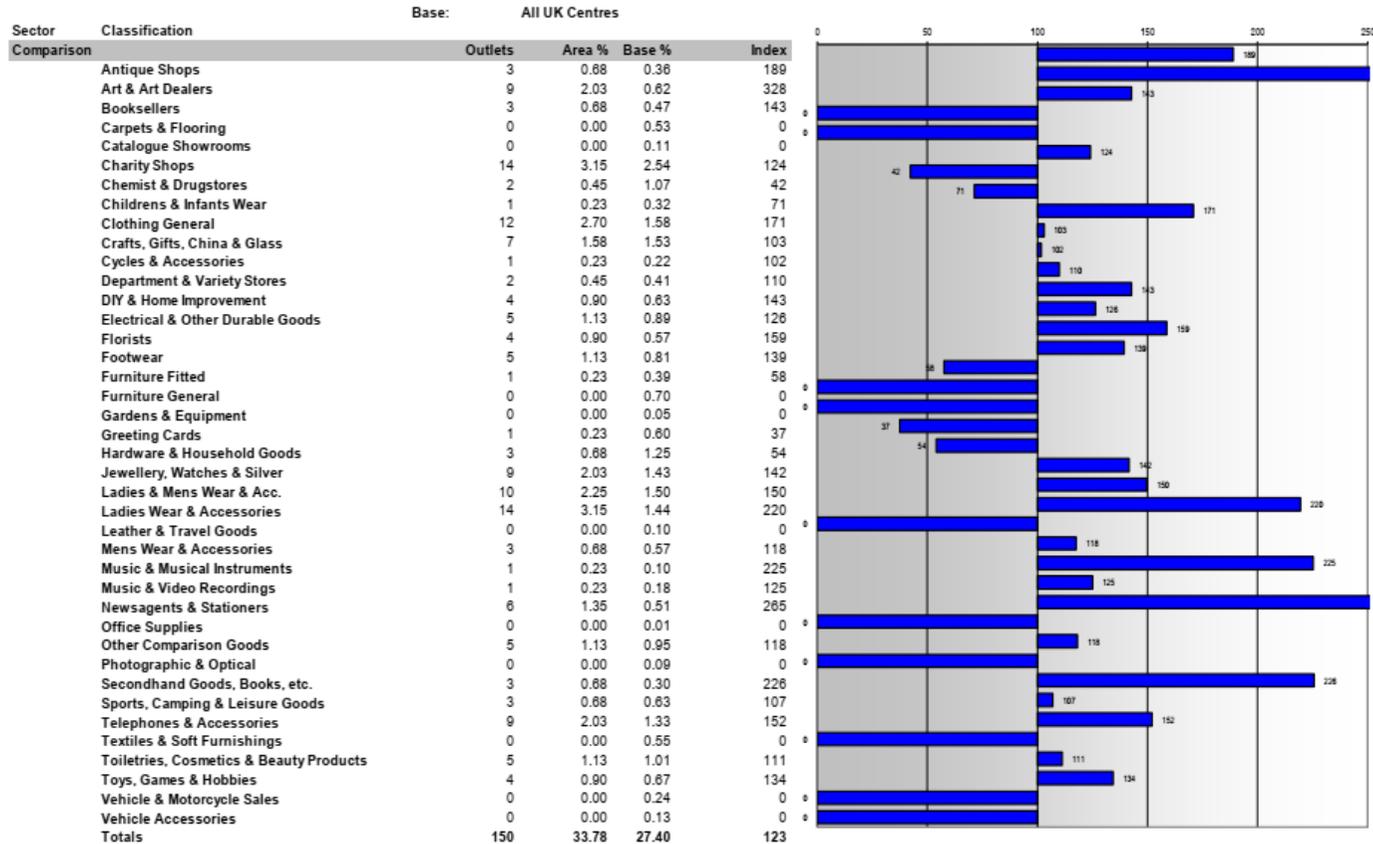


Outlet Counts

Centre:

Bury St Edmunds

Survey Date: 26/01/2021



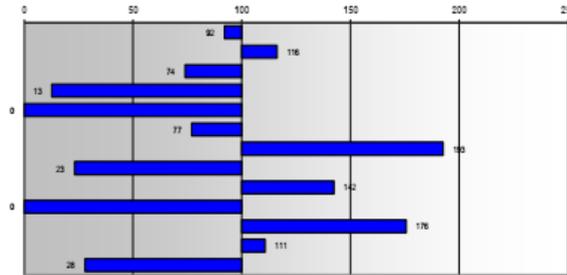
Outlet Counts

Centre:

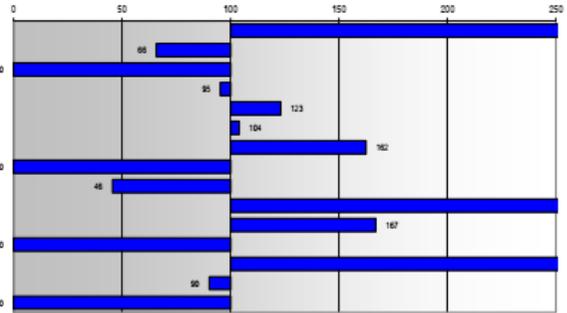
Bury St Edmunds

Survey Date: 26/01/2021

Convenience	Outlets	Area %	Base %	Index
Bakers & Confectioners	7	1.58	1.71	92
Butchers	3	0.68	0.58	116
CTN	4	0.90	1.22	74
Convenience Stores	1	0.23	1.78	13
Fishmongers	0	0.00	0.11	0
Frozen Foods	1	0.23	0.29	77
Greengrocers	2	0.45	0.23	193
Grocers & Delicatessens	1	0.23	0.98	23
Health Foods	3	0.68	0.47	142
Markets	0	0.00	0.15	0
Off Licences	3	0.68	0.38	176
Shoe Repairs Etc	2	0.45	0.41	111
Supermarkets	1	0.23	0.81	28
Total Convenience	28	6.31	9.13	69



Retail Service	Outlets	Area %	Base %	Index
Clothing & Fancy Dress Hire	2	0.45	0.05	848
Dry Cleaners & Launderettes	2	0.45	0.68	66
Filling Stations	0	0.00	0.23	0
Health & Beauty	44	9.91	10.38	95
Opticians	7	1.58	1.28	123
Other Retail Services	3	0.68	0.65	104
Photo Processing	1	0.23	0.14	162
Photo Studio	0	0.00	0.12	0
Post Offices	1	0.23	0.49	46
Repairs, Alterations & Restoration	4	0.90	0.30	302
Travel Agents	5	1.13	0.67	167
TV, Cable & Video Rental	0	0.00	0.08	0
Vehicle Rental	1	0.23	0.05	440
Vehicle Repairs & Services	2	0.45	0.50	90
Video Tape Rental	0	0.00	0.01	0
Totals	72	16.22	15.64	104



Other Retail	Outlets	Area %	Base %	Index
Other Retail Outlets	0	0.00	0.07	0



Outlet Counts

Centre:

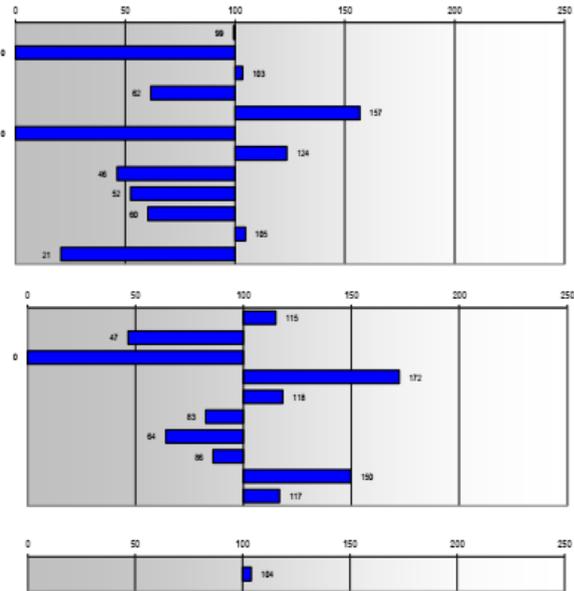
Bury St Edmunds

Survey Date: 26/01/2021

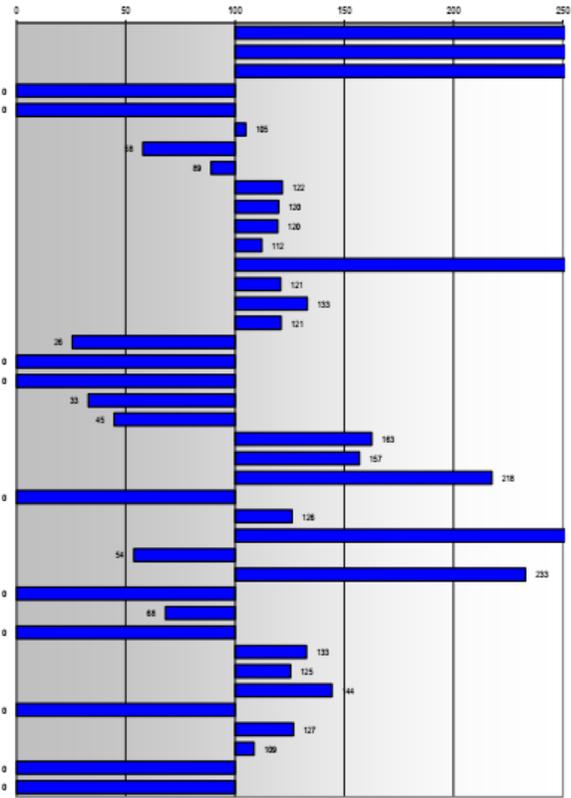
Leisure Services	Outlets	Area %	Base %	Index
Bars & Wine Bars	9	2.03	2.04	99
Bingo & Amusements	0	0.00	0.42	0
Cafes	22	4.95	4.79	103
Casinos & Betting Offices	3	0.68	1.10	62
Cinemas, Theatres & Concert Halls	2	0.45	0.29	157
Clubs	0	0.00	0.57	0
Disco, Dance & Nightclubs	1	0.23	0.18	124
Fast Food & Take Away	12	2.70	5.85	46
Hotels & Guest Houses	2	0.45	0.86	52
Public Houses	7	1.58	2.61	60
Restaurants	22	4.95	4.73	105
Sports & Leisure Facilities	1	0.23	1.09	21
Totals	81	18.24	24.53	74

Financial & Business Services	Outlets	Area %	Base %	Index
Building Societies	2	0.45	0.39	115
Building Supplies & Services	1	0.23	0.48	47
Business Goods & Services	0	0.00	0.03	0
Employment & Careers	3	0.68	0.39	172
Financial Services	7	1.58	1.33	118
Legal Services	4	0.90	1.09	83
Other Business Services	1	0.23	0.35	64
Printing & Copying	1	0.23	0.26	86
Property Services	21	4.73	3.16	150
Retail Banks	9	2.03	1.74	117
Totals	49	11.04	9.23	120

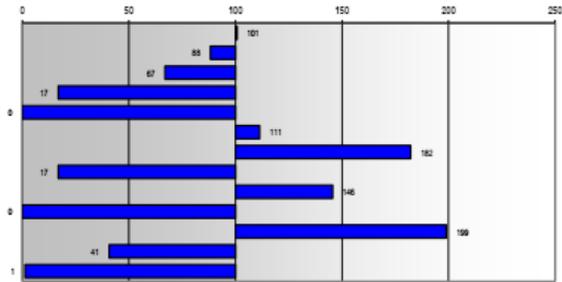
Vacant Outlets	Outlets	Area %	Base %	Index
Vacant Retail & Service Outlets	64	14.41	13.86	104
Total Number of Outlets	444			



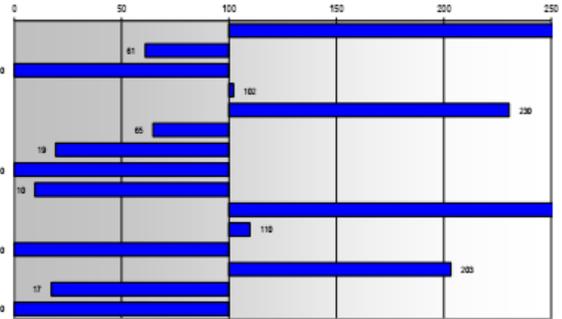
Sector	Classification	Floorspace	Area %	Base %	Index
Comparison					
	Antique Shops	7,100	0.77	0.19	396
	Art & Art Dealers	9,800	1.06	0.36	290
	Booksellers	11,400	1.23	0.43	285
	Carpets & Flooring	0	0.00	0.50	0
	Catalogue Showrooms	0	0.00	0.35	0
	Charity Shops	17,900	1.93	1.84	105
	Chemist & Drugstores	7,900	0.85	1.47	58
	Childrens & Infants Wear	1,800	0.17	0.19	89
	Clothing General	35,100	3.79	3.11	122
	Crafts, Gifts, China & Glass	8,600	0.93	0.77	120
	Cycles & Accessories	1,900	0.20	0.17	120
	Department & Variety Stores	43,900	4.73	4.22	112
	DIY & Home Improvement	42,600	4.59	0.95	483
	Electrical & Other Durable Goods	7,600	0.82	0.68	121
	Florists	2,500	0.27	0.20	133
	Footwear	8,300	0.90	0.74	121
	Furniture Fitted	800	0.09	0.34	26
	Furniture General	0	0.00	1.18	0
	Gardens & Equipment	0	0.00	0.06	0
	Greeting Cards	1,300	0.14	0.43	33
	Hardware & Household Goods	12,000	1.29	2.89	45
	Jewellery, Watches & Silver	10,000	1.08	0.66	163
	Ladies & Mens Wear & Acc.	32,000	3.45	2.20	157
	Ladies Wear & Accessories	22,800	2.46	1.13	218
	Leather & Travel Goods	0	0.00	0.06	0
	Mens Wear & Accessories	5,400	0.58	0.46	126
	Music & Musical Instruments	2,700	0.29	0.07	436
	Music & Video Recordings	700	0.08	0.14	54
	Newsagents & Stationers	12,000	1.29	0.56	233
	Office Supplies	0	0.00	0.01	0
	Other Comparison Goods	3,900	0.42	0.62	68
	Photographic & Optical	0	0.00	0.04	0
	Secondhand Goods, Books, etc.	1,900	0.20	0.15	133
	Sports, Camping & Leisure Goods	11,900	1.28	1.02	125
	Telephones & Accessories	8,000	0.86	0.60	144
	Textiles & Soft Furnishings	0	0.00	0.42	0
	Toiletries, Cosmetics & Beauty Products	11,400	1.23	0.97	127
	Toys, Games & Hobbies	5,700	0.61	0.57	109
	Vehicle & Motorcycle Sales	0	0.00	0.48	0
	Vehicle Accessories	0	0.00	0.18	0
	Totals	348,700	37.61	31.42	120



Convenience	Floorspace	Area %	Base %	Index
Bakers & Confectioners	7,900	0.85	0.85	101
Butchers	2,400	0.26	0.29	88
CTN	2,800	0.30	0.45	67
Convenience Stores	2,700	0.29	1.73	17
Fishmongers	0	0.00	0.05	0
Frozen Foods	8,700	0.94	0.84	111
Greengrocers	1,800	0.19	0.11	182
Grocers & Delicatessens	900	0.10	0.58	17
Health Foods	4,000	0.43	0.30	146
Markets	0	0.00	0.87	0
Off Licences	3,900	0.42	0.21	199
Shoe Repairs Etc	500	0.05	0.13	41
Supermarkets	1,100	0.12	8.97	1
Total Convenience	36,700	3.96	15.37	26



Retail Service	Floorspace	Area %	Base %	Index
Clothing & Fancy Dress Hire	1,200	0.13	0.03	466
Dry Cleaners & Launderettes	1,800	0.17	0.28	61
Filling Stations	0	0.00	0.12	0
Health & Beauty	37,500	4.04	3.96	102
Opticians	15,300	1.65	0.72	230
Other Retail Services	2,800	0.28	0.43	65
Photo Processing	100	0.01	0.06	19
Photo Studio	0	0.00	0.05	0
Post Offices	300	0.03	0.34	10
Repairs, Alterations & Restoration	2,800	0.30	0.10	302
Travel Agents	3,800	0.39	0.35	110
TV, Cable & Video Rental	0	0.00	0.01	0
Vehicle Rental	900	0.10	0.05	203
Vehicle Repairs & Services	1,100	0.12	0.69	17
Video Tape Rental	0	0.00	0.00	0
Totals	67,000	7.23	7.20	100



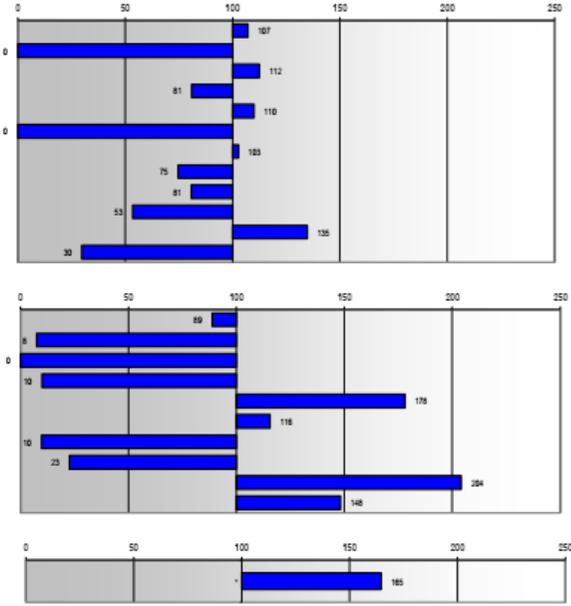
Other Retail	Floorspace	Area %	Base %	Index
Other Retail Outlets	0	0.00	0.04	0



Leisure Services	Floorspace	Area %	Base %	Index
Bars & Wine Bars	21,900	2.36	2.20	107
Bingo & Amusements	0	0.00	0.88	0
Cafes	28,500	3.07	2.73	112
Casinos & Betting Offices	6,800	0.71	0.88	81
Cinemas, Theatres & Concert Halls	18,400	1.98	1.81	110
Clubs	0	0.00	1.01	0
Disco, Dance & Nightclubs	3,400	0.37	0.36	103
Fast Food & Take Away	20,100	2.17	2.90	75
Hotels & Guest Houses	18,800	2.01	2.48	81
Public Houses	17,200	1.86	3.47	53
Restaurants	51,400	5.54	4.11	135
Sports & Leisure Facilities	7,900	0.85	2.86	30
Totals	194,000	20.92	25.70	81

Financial & Business Services	Floorspace	Area %	Base %	Index
Building Societies	2,500	0.27	0.30	89
Building Supplies & Services	300	0.03	0.43	8
Business Goods & Services	0	0.00	0.01	0
Employment & Careers	200	0.02	0.22	10
Financial Services	12,300	1.33	0.75	178
Legal Services	8,500	0.92	0.79	116
Other Business Services	400	0.04	0.45	10
Printing & Copying	300	0.03	0.14	23
Property Services	31,700	3.42	1.67	204
Retail Banks	30,000	3.24	2.18	148
Totals	86,200	9.30	6.95	134

Vacant Outlets	Floorspace	Area %	Base %	Index
Vacant Retail & Service Outlets	194,600	20.99	12.75	165
Total Floorspace	927,200			



TERMS AND CONDITIONS

1. DEFINITIONS

"this agreement" means the terms and conditions hereunder and the correspondence between the parties attached hereto.

"Experian" means Experian Group Limited.

"the Client" means the person, firm or limited company to whom the Services are to be provided.

"the Information" means any information (in whatsoever form) provided to the Client by Experian in connection with the Services.

"the Media" means the records, tapes or other materials and documents by which the information is communicated to the Client.

"the Services" means the services to be provided by Experian to the Client more particularly described in the correspondence between the parties attached hereto.

2. CONTRACT TERMS

Subject to Clause 14 hereunder this Agreement shall be on the terms and conditions set out below to the exclusion of any other terms and conditions whether or not the same are endorsed upon, delivered with or referred to in any document delivered or sent by the client to Experian.

3. PAYMENT OF CHARGES

3.1 The charges for the Services ("the Charges") shall be specified by Experian to the Client.

3.2 The Client shall pay the Charges within 28 days of the date of Experian's invoice thereof.

3.3 Interest at an annual rate of 5% above Barclays Bank plc's base rate from time to time shall accrue daily and be calculated on a daily basis on any sum overdue from the date of invoice until payment in full of the Charges.

3.4 Unless expressly stated otherwise the Charges shall be exclusive of VAT (or any other duty chargeable in respect thereof) (which for the avoidance of doubt shall be payable by the Client in accordance with the terms and conditions hereof).

4. PROVISION OF THE SERVICES

4.1 Experian shall use all reasonable endeavours to ensure that the information is accurate in all material respects.

4.2 Save as provided in sub-clause 4.1 above or otherwise expressly provided in this Agreement or to the extent that it is unlawful for any said representations and warranties to be excluded Experian makes no representations or warranties whether express or implied (by statute or otherwise) in connection with the Services or use thereof by the Client or otherwise in connection with this Agreement.

4.3 The parties hereto agree that the time for the performance of Experian's obligations in connection with the Services shall not be of the essence in this Agreement.

5. LIMITATION OF LIABILITY

Notwithstanding anything to the contrary contained in this Agreement:

5.1 Experian shall not be liable (whether in contract or in negligence (other than the liability in respect of death or personal injury arising out of the negligence of Experian its servants or agents) or other tort or otherwise) for any indirect or consequential loss of any kind whatsoever (including without limitation loss of profit or loss of business) suffered by the Client in connection with the Services.

5.2 Without prejudice to the provisions of sub-clause 4.1 above Experian's maximum aggregate liability hereunder (other than liability in respect of death or personal injury arising out of the negligence of Experian its servants or agents) whether for breach of this Agreement or otherwise and whether or not arising from the negligence of Experian or any other person involved directly or indirectly in the provision of the Services shall not exceed an amount equal to the Charges (exclusive of VAT) payable to Experian hereunder.

6. COPYRIGHT

Property and the copyright (and all other intellectual property rights) in the Media and the Information (other than any information which has passed to Experian by the Client in connection with the Services or which has been obtained from any third party by Experian which copyright and all other intellectual property rights as appropriate shall remain vested in such third party) shall at all times remain vested in Experian.

7. CONFIDENTIALITY

7.1 The Client undertakes that it shall use the Information solely for the purpose of its own business and shall not (without the prior written consent of Experian) copy reproduce publish or transmit any part of the Information in any manner whatsoever and the media shall be returned to Experian upon demand.

7.2 The Client undertakes with Experian that the Client shall permit access to the Information only to those of its authorized officers or employees who need to know or use the Information and that the Client shall procure that its offices and employees shall maintain in strictest confidence and not divulge communicate or permit access to any third party any confidential information relating to Experian.

7.3 For the purpose of sub-clause 7.2 hereof the expression "confidential information" shall mean (as the context may require)

7.3.1 the Information; and/or

7.3.2 any information concerning Experian's trade secrets or business dealings transactions or affairs which may come to the notice of the client; and/or

7.3.3 any information and/or know how relating to the methods or techniques used by Experian in devising and developing the Services and any tapes documents or other materials comprising any part of such information and/or know how made available by Experian hereunder.

7.4 The provisions of sub-clause 7.2 hereof shall not apply to any confidential information to the extent that:

7.4.1 the Client is required to divulge the same by a Court tribunal or government authority with competent jurisdiction

7.4.2 it has already come within the public domain

7.4.3 it was already known to the Client prior to the date of disclosure by Experian (as evidence by written records)

8. INDEMNITY

The Client shall indemnify and keep indemnified Experian from and against any and all liability loss claims demands costs or expenses of any kind whatsoever which shall at any time suffer or incur and which arise out of or in connection with the services provided that this indemnity shall not apply to the extent that any such liability arises of the default of Experian.

9. DATA PROTECTION ACT 1984

The Client undertakes that at all times they shall comply fully with the provisions of the Data Protection Act 1984 and any subsequent amendments thereto or re-enactments thereof.

10. TERMINATION

10.1 Experian shall be entitled to terminate this Agreement immediately by written notice to the Client if:

10.1.1 The Client is guilty of any material breach of the provisions of this Agreement and such breach if capable of remedy is not remedied within twenty one working days of written notice having been given to remedy such breach.

10.1.2 The Client has had a bankruptcy order made against it or has made an arrangement or composition with its creditors or (being a body corporate) has had convened a meeting of creditors (whether formal or informal) or has entered into liquidation (whether voluntary or compulsory) except a solvent voluntary liquidation for the purpose only of reconstruction or amalgamation or has a receiver manager administrator or administrative receiver appointed of its undertaking or any part thereof or a resolution has been passed or a petition presented to any Court for the winding-up of the Client or for the granting of an administration order in respect of the Client or any proceedings have been commenced relating to the insolvency of the Client.

10.2 The termination of this Agreement shall be without prejudice to the rights of Experian accrued prior to such termination.

11. FORCE MAJEURE

Notwithstanding anything herein contained neither party shall be under any liability to the other in respect of any failure to perform or delay in performing any of the obligations hereunder which is due to any cause of whatsoever nature beyond its reasonable control and no such failure or delay shall be deemed for any purposes to be a breach of this Agreement.

12. ASSIGNMENT

The rights granted to the Client hereunder are personal to it and the Client shall not assign or grant any rights in respect of or otherwise deal in the same.

13. WAIVER

Failure by either party to enforce any of the provisions of this Agreement shall not operate as a waiver of any of its rights hereunder or operate so as to bar the exercise or enforcement thereof at any time or times.

14. VARIATIONS

This Agreement constitutes the whole of the terms agreed between the parties hereto in respect of the subject matter hereof and supersedes all previous negotiations, understandings or representations and shall be capable of being varied only by an instrument in writing signed by a duly authorised representative of each of the parties hereto.

15. NOTICE

Any notice to be given hereunder by either party to the other may be given by first class mail addressed to the party of the address herein specified or such other address as such party may from time to time nominate for the purpose hereof or by telex or telefax and shall be deemed to have been served.

15.1 If given by mail seventy-two hours after the same shall have been despatched and

15.2 if given by telex or telefax one hour after transmission (if transmitted during normal business hours) and twelve hours after transmission (if transmitted outside normal business hours).

16. SEVERANCE

This Agreement is severable in that if any provision hereof is determined to be illegal or unenforceable by any Court or competent jurisdiction such provision shall be deemed to have been deleted without affecting the remaining provisions of this Agreement.

17. LAW

This Agreement shall be governed by and construed in accordance with English Law and the parties hereto agree that the English Courts shall have exclusive jurisdiction.

