

## 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  
Update and Additional  
Scenario Tests

April 2022

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Additional Scenario Tests**

**Applicant: K/S Cratfield**

**April 2022**

**reference:**

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# 1 Introduction

1.1 This report sets out an Update to the Retail Impact Assessment submitted for planning application DC/21/0427/FUL for change of use from Gym (Class E) to Retail (Class E) for the Sports Direct Gym, Easlea Road, Bury St Edmunds.

1.2 The Update addresses the following issues:

- It rebases the RIA reflecting the time that has passed since the original RIA was submitted – the base year is updated to 2022 and test year to 2024. Not only does this provide a more accurate basis for assessing the proposed development but it avoids the difficulties associated with estimates of expenditure and turnover during 2021 which were particularly affected by atypical trading conditions during the main period of the Covid-19 pandemic. Although the pandemic is still present and will be having some effect on retail expenditure patterns and turnover it is anticipated that this will be significantly less in 2022 than in 2021.
- It provides the opportunity to use the latest forecasts of expenditure growth provided by Experian published in Feb 2022 which provides the greatest opportunity to take into account the current forecast impacts of expenditure growth and future trends for special forms of trading. Comment is also provided concerning the most recent forecasts provided by Precisely (published October 2021).
- It specifically addresses the general comments raised by LSH in their review of the RIA (letter dated 11<sup>th</sup> October 2021) concerning:
  - adjustments of market share from the 2016 South Edmundsbury Retail and Leisure Study (SERS) between 2016 and the base/test years (LSH para 67).
  - Comment on assumptions regarding trade diversion assumptions (LSH para 68).
  - Confirmation that turnover estimates take into account major closures in Bury St Edmunds (notably Debenhams and Topshop) (LSH Para 68).
  - Clarity regarding turnover sales densities adopted for the proposed development scenarios including reference to “productivity” growth (LSH para 77).
- Additional scenarios are tested on the hypothetical basis, that the operator could be:
  - Freezer centre operator
  - Wilko
  - Poundland

## 2 Updating the RIA Model

### Overview

- 2.1 The social restrictions introduced to combat the Covid-19 pandemic have caused major short term disruption to retail expenditure patterns and, as a consequence of this, to the turnover of retailers. This impact has not, necessarily been negative in that, for certain retailers classed as “essential”, sales and turnover in 2021 were significantly higher than in earlier years and it is notable that convenience goods expenditure per capita was also significantly higher. However this was also associated with a significant increase in expenditure directed through special forms of trading (dominated by online sales) and, for comparison goods, although there was an increase in sales between 2020 and 2021, the growth rate was much lower than had occurred prior to 2020.
- 2.2 At the time that the RIA was prepared in 2021 the long term effects of the pandemic restrictions on retail expenditure patterns were uncertain. Although the RIA used the most up to date information available through the use of Precisely 2020 forecasts the position concerning future trends now appears to be clearer. In particular Experian delayed the publication of their latest forecasts (Retail Planner 19) until February 2022 so that they were able to gain a better understanding of the impacts of the pandemic and, in particular, the effect of the “omicron” wave. Given this earlier uncertainty it is sensible to review the assumptions adopted in the RIA to take into account the latest expenditure forecasts.
- 2.3 Linked to the forecast of expenditure growth is the assessment and estimate of existing turnover within Bury St Edmunds and in the catchment area for the proposed development. The original RIA linked turnover estimates to the 2016 SERS report but reduced the forecast turnover for convenience floorspace by 3.5% to reflect the fact that available expenditure for these goods was anticipated not to have grown as rapidly as forecast in the SERS report. As it turned out, because of the impacts of lockdown, expenditure on convenience goods in 2021 was, in fact unusually high according to both Experian and Precisely, but this was due to atypical short term factors and, as such they cannot be relied upon for the RIA. Rebasing the assessment to 2022 largely avoids the unusual circumstances prevalent during 2021.
- 2.4 Use of the latest expenditure forecasts allows a more accurate assessment of expenditure change from 2016 and the implications that this has for the turnover of existing floorspace within Bury St Edmunds.

### Population and Available Expenditure

- 2.5 Table 2.1 presents the update forecasts of available expenditure for the base year of 2022 and test year of 2024. The assumptions are set out in the notes to the table:
- Population growth has been assumed to be at a constant rate using the population forecasts sets out in SERS but adjusted to 2022 and 2024 resulting in a marginal population increase.
  - Expenditure growth has been updated and is based on Experian Retail Planner 19 (RP19).
- 2.6 It is noted that, in the original RIA, use was made on the 2020 Precisely REG forecasts. For convenience goods there is limited difference between Precisely and Experian although there are more significantly differences for

comparison goods with Precisely forecasting higher levels of SFT compared to Experian. Experian has been adopted in this case for the following reasons:

- The SERS report is actually based on Experian expenditure estimates – see the note to SERS App 4 Table 2. Given that the source data used for base expenditure was Experian it is more consistent to use the same forecasting organisation for identifying future years turnover.
- The most recent Precisely forecasts (Retail Expenditure Guide 2021-22) were published in October 2021, i.e. *before* the Omicron wave. Experian's RP19 are not only more up to date, in that they benefit from an additional 4 months data on actual expenditure habits, but they have tried to take into account the most recent consumer responses to the pandemic.

- 2.7 Notwithstanding the above a comparable analysis has been undertaken by Hargest Planning Ltd using the Precisely forecasts and these can be provided if required.
- 2.8 In addition to the above it should be noted that Table 2.1 uses the RP19 forecasts for adjusted special forms of trading for 2016 – these differ from those used in the SERS report and it is not clear why the authors of the SERS report decided not to use the actual Experian estimates of SFT available at that time but, instead, used lower figures (see App 4 Tables 2 and 4). However, the effect of this is that the RIA Update presented here assumes significantly higher levels of SFT for both 2016 and the base/test years which would lead to *lower* estimates of retail turnover within Bury St Edmunds (and, consequently, *higher* retail impacts).
- 2.9 This update to the available expenditure therefore fully takes into account changes in expenditure between 2016 and 2022/2024 in line with the best available forecasts. This therefore addresses the concerns of LSH at para 67 of their letter.

**TABLE 2.1: PRIMARY CATCHMENT AREA - RESIDENT POPULATION AND EXPENDITURE**

2014 Prices

Updated to 2022/2024 and latest expenditure forecasts (Experian RP 19 Feb 2022)

YEAR		POPULATION	CONVENIENCE AVAILABLE EXPENDITURE		COMPARISON AVAILABLE EXPENDITURE	
			Rate Per Head	Total £m	Rate Per Head	Total £m
2016	Zone 1 Bury St Edmunds	42,795	£1,929	£82.57m	£2,735	£117.04m
	Zone 2 Rural East	36,217	£2,189	£79.28m	£3,405	£123.30m
	Zone 3 Rural Central	15,080	£2,333	£35.18m	£3,687	£55.60m
	<b>Total</b>	<b>94,092</b>		<b>£197.03m</b>		<b>£295.94m</b>
2022	Zone 1 Bury St Edmunds	44,069	£1,901	£83.76m	£2,733	£120.44m
	Zone 2 Rural East	37,184	£2,156	£80.18m	£3,402	£126.51m
	Zone 3 Rural Central	15,524	£2,298	£35.67m	£3,684	£57.19m
	<b>Total</b>	<b>96,777</b>		<b>£199.61m</b>		<b>£304.14m</b>
2024	Zone 1 Bury St Edmunds	44,460	£1,891	£84.07m	£2,831	£125.85m
	Zone 2 Rural East	38,190	£2,145	£81.93m	£3,524	£134.57m
	Zone 3 Rural Central	15,972	£2,286	£36.52m	£3,816	£60.95m
	<b>Total</b>	<b>98,622</b>		<b>£202.52m</b>		<b>£321.37m</b>

Notes

- 1 Population from SRS App 4 Table 1
- 2 Population growth - estimate of 2022-24 Population
- |      | Zone 1 | Zone 2 | Zone 3 |
|------|--------|--------|--------|
| 2021 | 43875  | 37184  | 15524  |
| 2022 | 44069  | 37383  | 15613  |
| 2023 | 44264  | 37583  | 15702  |
| 2024 | 44460  | 37784  | 15791  |
| 2026 | 44855  | 38190  | 15972  |
- 3 Base Available Expenditure for 2016 from SERS App 4 Tables 2 and 4

Experian Retail Planner 19 Feb 2022	Zone 1		Zone 2		Zone 3		Source
	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	
2016 base (gross SFT)	£1,985	£3,169	£2,252	£3,945	£2,400	£4,272	SERS App 4 Tables 2 and 4
2016 base (net SFT)	£1,929	£2,735	£2,189	£3,405	£2,333	£3,687	Experian RB Note 19 (Jan 2022) Figure 5
2021 (gross SFT)	£2,056	£3,516	£2,333	£4,377	£2,486	£4,740	Experian RB Note 19 (Jan 2022) App 4a
2021 (net SFT)	£1,927	£2,581	£2,186	£3,213	£2,330	£3,479	Experian RB Note 19 (Jan 2022) Figure 5
2022 (gross SFT)	£2,015	£3,591	£2,287	£4,471	£2,437	£4,841	Experian RB Note 19 (Jan 2022) App 4a
2022 (net SFT)	£1,901	£2,733	£2,156	£3,402	£2,298	£3,684	Experian RB Note 19 (Jan 2022) Figure 5
2023 (gross SFT)	£2,017	£3,692	£2,289	£4,596	£2,439	£4,976	Experian RB Note 19 (Jan 2022) App 4a
2023 (net SFT)	£1,896	£2,780	£2,151	£3,460	£2,293	£3,747	Experian RB Note 19 (Jan 2022) Figure 5
2024 (gross SFT)	£2,018	£3,794	£2,290	£4,724	£2,440	£5,115	Experian RB Note 19 (Jan 2022) App 4a
2024 (net SFT)	£1,891	£2,831	£2,145	£3,524	£2,286	£3,816	Experian RB Note 19 (Jan 2022) Figure 5

## Estimate of Existing Turnover

2.10 SERS estimates the turnover of both convenience and comparison floorspace on the basis of market share estimates from the household survey. For convenience goods this produces reasonably reliable results although, it should be noted, the sales density for Aldi would appear to be unrealistically high. However, use of household surveys for estimating comparison turnover is very unreliable reflecting the fact that comparison goods shopping trips are highly variable (significantly more so than for convenience goods) and there is a particular bias in responses to major shopping destinations.

2.11 Table 2.2 sets out the updated estimates of turnover of existing floorspace in 2022 and 2024.

### Convenience Goods

2.12 SERS identified that the 2016 existing turnover for convenience goods in Bury St Edmunds in Appendix 5 Table 7: City Centre - £38.5m (including net inflows); Remainder of town - £155.2m (including net outflows); total = £193.7m..

2.13 Most of this convenience turnover was derived from study Zones 1, 2 and 3 (see App 5 Table 2 – these zones accounted for £30.8m turnover). The forecast of turnover was a direct function of market share multiplied by available expenditure. Therefore, adopting the same market share approach and assumptions, any change in available expenditure will lead to a change in turnover (on the basis that there have been no significant new convenience stores developed in the town since 2016).

2.14 For 2016 SERS identified that convenience available expenditure (net SFT) from Zones 1 -3 as £200.4m whereas, in comparison, Table 2.1 identifies the current estimate of available expenditure in these zones to be £199.6, i.e. a reduction of 0.4%. In fact, if one considered inflows from other zones these would also be subject to the same adjustments in expenditure forecasts as used for Zones 1 to 3. Therefore, the best estimate of convenience turnover within Bury St Edmunds in 2022 would be 0.4% lower than identified for 2016 in SERS. This marginal reduction has therefore been identified in the turnover estimates for 2022 set out in Table 2.2 in which total convenience turnover in the town is £192.9m.

2.15 Table 2.2 does adjust the figures slightly since it is considered that SERS underestimates the turnover of “Other Bury St Edmunds Out of Centre” increasing this and, correspondingly, reducing the Aldi figure.

### Comparison Goods

2.16 The same approach can be adopted for comparison goods and described above for convenience goods. On this basis:

- SERS identifies: available expenditure for comparison goods from Zones 1-3 to be £294.4m in 2016 (SERS App 4 Table 5) and turnover for existing floorspace (TC plus OOC) as £389.6m for the City Centre and £78.9m for OOC for 2016 (SERS App 6 Table 7).
- Table 2.1 identifies the TAE for comparison goods in 2022 to be £304.1m in 2022 which implies a modest uplift of 3.3% compared to the 2016 SERS figures implying a turnover of: £304.1m for the TC and £81.5m in 2022.



- 2.17 However, the implied turnover and sales densities for comparison goods, especially for floorspace within the City Centre, is not tenable. Table 2.2 uses the best estimates available for 2021 floorspace within the City Centre (sourced from a combination of Retail Rankings, Valuation Office data, property particulars and planning applications). If one adopts the SERS information the average sales density within the City Centre would be £12,676 psm which is an unrealistically high sales density and would be indicative of an exceptionally strong pressure on retail floorspace. Although the vitality and viability of the City Centre is strong, it is not exceptionally strong. Conversely the implied sales density for OOC comparison floorspace is unrealistically low. Using the adjusted SERS implied turnover figure for OOC space, this implies a sales density of only £1906psm out of centre.
- 2.18 These results are not unexpected when one relies literally on the results of the household survey for estimating comparison turnover. The authors of SERS should have verified the validity of the implied turnover by considering the amount of floorspace and implied sales densities as part of the SERS study but there is express consideration of this in that report.
- 2.19 As a result of this Table 2.2 estimates turnover of existing floorspace by referring both to the information from SERS and by reference to average sales densities in Retail Rankings. It is accepted that this is only an estimate. It should, however, be noted that Table 2.2 estimates existing comparison turnover within the whole of BSE as £333.06m which is substantially less than would be implied for the whole of the town from the SERS household survey (i.e. £385.6m when adjusted to 2022 available expenditure). The overall effect of assuming a lower turnover is that this will **over-estimate retail impacts** for example, if one assumes comparison goods trade diversion of £10m from the City Centre the RIA would forecast an impact of 3.0% whereas, if one adopted the SERS figure, the impact would be 2.6%.
- 2.20 Table 2.2 has also identified the principal non-food discounters in Bury St Edmunds. This information is used for the assessment of retail impacts associated with the operator of the non-food discounter being named as either Poundland or Wilko (scenario tests E & F in Section 3).
- 2.21 As a result of this it is considered that the estimate of comparison turnover provides the basis for a robust estimate of retail impact from the proposed development. This takes full account of recent impacts of the pandemic on special forms of trading as forecast by Experian.

#### **Effect of Recent Closures and New Floorspace**

- 2.22 Table 2.2 identifies all occupied retail floorspace. It therefore takes into account recent store closures. For example Debenhams (7844 sq m GFA) and Topshop (825 sq m GFA), which are both noted in the LSH review, would, if still trading, be expected to have a turnover in the region of £15m and, consequently, if trading the estimated turnover of the City Centre would have been correspondingly higher.
- 2.23 Table 2.2 also expressly identifies the turnover associated with new store openings including The Range, B&M and Glasswells extension. These are clearly identified in Table 2.2.
- 2.24 This explanation of the basis for deriving existing floorspace turnover and the treatment of new floorspace/closures addresses the questions raised by LSH at para 68 of their letter.

TABLE 2.2: FLOORSPACE AND TURNOVER IN 2022 AND 2024  
2014 Prices

	No.	Convenience Goods				Comparison Goods				All Goods			Turnover in 2024				
		GFA	NFA	Turnover 2022 Per Sq M	Total £m	GFA	NFA	Turnover 2022 Per Sq M	Total £m	GFA	NFA	Turnover 2022 Total £m	Convenience	Comparison	Turnover 2024 Total £m		
BURY ST EDMUNDS CITY CENTRE																	
The Arc																	
Convenience	1	91	59	£8,863	£0.52m	11140	7241	£12,000	£86.89m	91	59	£0.52m	£0.53m	£91.81m	£0.53m		
Comparison	25																
Retail Services	1																
Leisure Services	7																
F&B Services	0																
Vacant	2	7937															
TOTAL	36	91	59	£0.52m		11140	7241	£86.89m		20869	7300	£87.42m	£0.53m	£91.81m	£92.35m		
Robert Boby Retail Park																	
Convenience	1	3163	1898	£11,658	£22.12m	558	335	£7,577	£2.54m	3721	2233	£24.66m	£22.45m	£2.68m	£25.13m		
Comparison	1																
	1																
	1					1858	1486	£4,500	£6.69m	1858	1486	£6.69m		£7.07m	£7.07m		
	1					796	691	£3,500	£2.42m	796	691	£2.42m		£2.56m	£2.56m		
Vacant	2									1208							
TOTAL	5	3163	1898	£22.12m		3212	2512	£11.64m		7583	4410	£33.77m	£22.45m	£12.30m	£34.75m		
Remainder of City Centre																	
Convenience	27	3319	1991	£7,899	£15.73m					3319	1991	£15.73m	£15.96m		£15.96m		
Comparison																	
	1																
	1																
	126																
All Comparison	128	114	86	£0.56m		17974	11642	£9,253	£107.72m	17860	11642	£107.72m		£113.82m	£113.82m		
Retail Services	61					21903	14237	£8,040	£114.46m	21903	14323	£115.02m	£0.57m	£120.95m	£121.52m		
Leisure Services	91									5269							
F&B Services	51									20196							
Vacant	50									8335							
										6249							
TOTAL	536	3433	2077	£16.29m		21903	14237	£114.46m		25221	16314	£130.75m	£16.52m	£120.95m	£137.47m		
TOTAL CITY CENTRE																	
Convenience	29	6572	3948	£9,862	£38.93m	36255	23990	£8,879	£213.00	6572	3948	£38.93m	£39.50m	£225.07m	£39.50m		
Comparison	155																
Retail Services	62																
Leisure Services	98																
F&B Services	51																
Vacant	54																
TOTAL	449	6572	3948	£38.93m		36255	23990	£213.00m		93722	27938	£251.94m	£39.50m	£225.07m	£264.57m		
St Edmundsbury Retail Park/Easlea Road																	
Convenience		335	268	£9,000	£2.41m	782	626	£7,000	£4.38m	1117	894	£6.79m	£2.45m	£4.63m	£7.08m		
Comparison	1																
	9																
All Comparison	10	335	268	£8,990		11629	9303	£25.40m		11629	9303	£25.40m		£26.84m	£26.84m		
Vacant	1					12411	9929	£3,000	£29.79m	12746	10197	£32.20m	£2.45m	£31.47m	£33.92m		
	21	335	268	£2.41m		12411	9929	£29.79m		139							
										12885	10197	£32.20m	£2.45m	£31.47m	£33.92m		
Bartons Retail Park																	
Convenience	1	498	374	£5,334	£1.99m	2173	1412	£1,500	£2.12m	498	374	£1.99m	£2.02m	£2.24m	£2.02m		
Comparison	7																
Leisure Services	2																
	10	498	374	£1.99m		2173	1412	£2.12m		250							
										2921	1786	£4.11m	£2.02m	£2.24m	£4.26m		
Other Major Foodstores																	
Aldi	1	1426	927	£24,515	£22.72m	475	309	£15,935	£4.92m	1901	1236	£27.64m	£23.05m	£5.20m	£28.25m		
Asda	1																
Co-op	1																
Sainsbury's	1																
Tesco	1																
	5	19358	11225	£147.59m		3640	2126	£19.25m		22998	13352	£166.84m	£149.74m	£20.34m	£170.08m		
Other Major Non-Foodstores																	
Matalan	1	455	364	£5,473	£1.99m	2882	2162	£1,796	£3.88m	2882	2162	£3.88m	£2.02m	£4.10m	£4.10m		
The Range	1					5058	4496	£1,900	£8.54m	1693	1166	£8.54m		£9.03m	£9.03m		
B&M	1					1820	1456	£3,485	£5.07m	2275	1820	£7.07m		£5.36m	£7.38m		
Glasswells	1					10856	7580	£868	£6.58m	10856	7580	£6.58m		£6.95m	£6.95m		
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		£0.76m	£0.76m		
B&Q	1					4690	3699	£1,534	£5.67m	4690	3699	£5.67m		£6.00m	£6.00m		
Miscellaneous Others	15+								£37.20m			£37.20m		£39.30m	£39.30m		
Total	22+	455	364	£1.99m		27452	20560	£68.70m		24542	17594	£70.69m	£2.02m	£72.59m	£74.61m		
PRIMARY CATCHMENT AREA TOTAL	507+	27219	16179	£192.92m		81931	58017	£332.85m		157068	70866	£525.77m	£195.73m	£351.71m	£547.44m		

Notes:

- Retail units identified from survey June 2021 with floorspace correlated to Goad Jan 2021 Survey
- Floorspace estimates from (i) Goad Jan 2021 survey; (ii) Valuation Office records for premises (iii) St Edmundsbury Retail Study (SERS) for major foodstores only.
- Convenience turnover from SERS ( adjusted to reduced expenditure growth 2016-21 - see comments in text) but comparison turnover from reference to both SERS and 2021 Retail Rankings
- Turnover in 2024 increased in line with available expenditure growth Table 2.1.

## Development Scenarios

- 2.25 This section updates the assessment of impact for the three scenarios presented in the RIA. At paras 76 and 77 of their letter LSH raise questions regarding “productivity” growth and use of base year sales density figures.

### Base Year Sales Density

- 2.26 At the outset the “base year” sales density is an irrelevance. The base year is 2022 and is used as a reference point for assessing how turnover in defined centres will change with the proposed development. In 2022 there is absolutely no possibility that a store would be trading in the application site – planning permission has not been granted, conditions have not been discharged and the store needs to be constructed and fitted-out. The only issue that is significant is the sales density adopted in the Test Year, i.e. 2024 and this is addressed below.

### Assumptions re Productivity

- 2.27 There is no basis for assuming that there should be an automatic increase in sales densities for retail floorspace. The practice to do this in retail planning is a hangover from past practice (pre-2008) when there was very rapid growth in expenditure (especially for comparison goods but, compared to today, for convenience goods as well) and, as a result it was assumed that this should continue. This RIA presents assessments on a constant price basis and there is no entitlement for new floorspace to assume that sales densities will increase indefinitely. It is accepted that, for example, Experian assume growth in sales densities for comparison goods (but not for convenience goods) but the rates of growth they identify are, in fact, not consistent with long term information provided by Retail Rankings and it is notable that precisely do not adopt such an approach. Indeed, there is an argument to suggest that, once floorspace is developed, after a period of time, without major new investment retail units tend to become tired and outdated and, if anything, existing floorspace is more likely to experience reduced sales densities. However, the key issue affecting sales densities is not the physical space itself but the ability of the retail operator to provide a retail offer that continues to be attractive to customers and this is the key factor that determines future sales densities.
- 2.28 By way of comparison, if one considers the sales densities identified in the 2021 edition of Retail Rankings which were also available for 2018 and 2019 one can identify an average growth of sales densities of 0.9% pa in constant prices between 2018 and 2020. However, this figure is in fact distorted by one operator, namely Apple stores, and if this is excluded real growth is only 0.4% pa. Given that the base year in the RIA is 2022 and test year is 2024 an appropriate uplift would be only 0.9%. The figure for convenience goods shops is marginally higher – on a constant price basis the increase is +1.7% over the two years.
- 2.29 Rather than assuming an increase in sales densities of <1% for comparison goods and <2% for convenience goods a more sensible approach is the use of a sensitivity test where the assumed sales density is altered. This has been undertaken where sales densities were altered by +/-25% i.e. far dwarfing any potential changes in sales densities that may occur.
- 2.30 In addition, one should also consider the sales densities that have been adopted in the three scenarios and compare these to “average” sales densities for the type of retail proposed which is set out in the following paragraphs.

### Scenario A – Food Discounter

2.31 Table 2.4A sets out the assumed sales density for a food discounter at £10,097 psm for both convenience and comparison goods. The following Table A summaries the most recent information for sales densities for food discounters from Retail Rankings and Global data.

**Table A: Scenario A Sales Densities Comparators**

	Aldi	Lidl	Average	Ratio of Scenario
	£psm	£psm	£psm	£psm to Average
<b>1. Current Prices</b>				
2021 Retail Rankings				
2018	11915	7301	9608	
2019	12387	7542	9965	
2020	12588	7549	10069	
Globaldata (est) 2021 (inc VAT)				
Conv	11199	8883	10041	
Comp	7876	4789	6333	
All Goods (80/20)	10534	8064	9299	
<b>2 2014 Prices</b>				
2021 Retail Rankings				
2018	11438	7009	9224	122%
2019	11681	7112	9397	119%
2020	11733	7036	9384	120%
Globaldata (est) 2021 (inc VAT)				
Conv	10408	8255	9331	120%
Comp	7719	4693	6206	181%
All Goods (80/20)	9870	7543	8706	129%

2.32 The adopted sales density for Scenario A is significantly higher than the comparators set out in Table A i.e. 19-22% higher than the RR2021 figures for 2018-2020 (all goods) 20% higher than Globaldata for 2021 for convenience goods and much higher than 2021 Globaldata figure for comparison goods.

2.33 Given that the sales densities adopted in Scenario A are already high there is no basis for amending these to reflect questionable “productivity” gains.

## Scenario B General Supermarket

2.34 Table B provides the same analysis for Scenario B from the same sources.

**Table B: Scenario B Sales Densities Comparators**

	Co-op	M&S	Tesco	Average	Ratio of Scenario £psm to Average
<i>1. Current Prices</i>					
2021 Retail Rankings					
2018	8599	9466	11147	9032.5	
2019	9434	9096	11533	9265	
2020	9722	9246	12156	9484	
Global (est) 2021 (inc VAT)					
Conv	11169	11257	14304	11213	
Comp	9043	9033	8722	9038	
All Goods (80/20)	10744	10812		10778	
<i>2 2014 Prices</i>					
2021 Retail Rankings					
2018	8582	9087	11611	8835	120%
2019	9411	8578	11556	8994	131%
2020	9693	8618	12156	9155	129%
Global (est) 2021 (inc VAT)					
Conv	10380	10461	14018	10421	113%
Comp	8863	8853	8548	8858	87%
All Goods (80/20)	10076	10140		10108	105%

2.35 In this scenario sales densities for convenience goods are even higher than for Scenario A. The only aspect where they are lower is for comparison goods sales but, given that these comprise only a small proportion of floorspace this is not significant. Furthermore, the sensitivity tests include an assessment where both convenience and comparison sales densities are a further 25% higher. The conclusion for Scenario B is the same as for Scenario A – there is no basis for making any further adjustments for “productivity” gains.

### Scenario C Non Food Discounter

- 2.36 Table C provides the same analysis for Scenario C from the same sources (information from Globaldata is not available for these non-food retailers). It should be noted that Home Bargains data is only available in RR21 for year ending 2018 and for Poundland for 2018 and 2019).

**Table C: Scenario C Sales Densities Comparators**

	B&M	HB	Poundland	Wilko	Average	Ratio of Scenario £psm to Average
<i>1. Current Prices</i>						
2021 Retail Rankings						
2018	3485	7391	3583	2390	4212	
2019	3319	7391	3389	2199	4075	
2020	3586	7391	3583	2070	4158	
<i>2 2014 Prices</i>						
2021 Retail Rankings						
2018	3422	7258	3519	2347	4136	102%
2019	3250	7236	3318	2153	3989	106%
2020	3504	7222	3501	2023	4062	104%

- 2.37 In this scenario assumed sales densities are closer to those identified in Retail Rankings although they are still above the identified averages and would remain above the averages if allowance was made for the marginal growth in sales densities identified for comparison goods shops over the period 2018-2020 noted earlier. As with the other scenarios there is, therefore, no basis for making any further allowances for “productivity” gains.

### Updated Retail Impact Assessment Calculations

- 2.38 Tables 2.1 and 2.2 have updated the available expenditure and existing floorspace turnover estimates. It has been demonstrated that there is no justification for incorporating a “productivity” factor for the three scenarios tested in the RIA on the grounds that (i) there is no clear evidence that there any expectation of productivity to increase; (ii) regardless of this each of the scenarios adopts sales densities significantly in excess of relevant average levels; and (iii) much higher sales densities are also tested in the sensitivity tests.
- 2.39 The following tables therefore provide an update to the calculated retail impacts for the three Scenarios presented in the original RIA.

### Development Scenarios – Floorspace and Turnover

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

2014 Prices

	GFA	NFA	Turnover Rate	Total Turnover 2024
<b>Total Floorspace &amp; Turnover</b>				
Convenience	1417	992	£11,219	£11.13m
General Comparison	250	175	£11,219	£1.96m
Bulky Goods	0	0		£0.00m
<b>Total</b>	<b>1667</b>	<b>1167</b>		<b>£13.09m</b>
	<b>1667</b>	<b>1167</b>		<b>£13.09m</b>

**Notes:**

Turnover assumptions: £psm Average of stores from Retail Rankings 2021/Globaldata 2018-2021

Unit: Food Discounter 9178 Aldi; Lidl. 2014 prices

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

2014 Prices

	GFA	NFA	Turnover Rate	Total Turnover 2024
<b>Total Floorspace &amp; Turnover</b>				
Convenience	1167	700	£11,816	£8.27m
General Comparison	500	300	£7,680	£2.30m
Bulky Goods	0	0		£0.00m
<b>Total</b>	<b>1667</b>	<b>1000</b>	<b>£10,575</b>	<b>£10.58m</b>
	<b>1667</b>	<b>1000</b>		<b>£10.58m</b>

**Notes:**

Turnover assumptions: £psm Average of stores from Retail Rankings 2021 Globaldata - 2018-2021 2014 prices

Unit: General Mid-Sized Supermarket 9273 Co-op, M&S Foodhall and Tesco

**TABLE 2.4C: PROPOSED DEVELOPMENT - SCENARIO C - NON-FOOD DISCOUNTER**  
2014 Prices

	<b>GFA</b>	<b>NFA</b>	<b>Turnover Rate</b>	<b>Total Turnover 2024</b>
<b>Total Floorspace &amp; Turnover</b>				
Convenience	417	313	£4,213	£1.32m
General Comparison	917	688	£4,213	£2.90m
Bulky Goods	333	250	£4,213	£1.05m
<b>Total</b>	<b>1667</b>	<b>1250</b>		<b>£5.27m</b>
	<b>1667</b>	<b>1250</b>		<b>£5.27m</b>

**Notes:**

Turnover assumptions:	£psm	Average of stores from Retail Rankings 2021 Globaldata 2018-2021	2014 prices
Unit: Non-Food Discounter	4063	B&M; Home Bargains; Poundland ; Wilko (Poundstretcher and The Range not available)	



### Development Scenarios – Trade Diversion

- 2.40 Trade diversion assumptions remain the same as those used in the RIA tables 2.5A to 2.5C and are not, therefore, repeated here.

### Comment on Scenario C Trade Diversion from the Arc

- 2.41 At para 134 LSH request further clarification on the basis of trade diversion for this Scenario from the Arc. As explained in the original RIA the same general principles for identifying trade diversion assumptions were adopted for each of Scenarios A to C which were explained at para 2.24 of the RIA. These factors are:

- Similarity of goods traded
- Level of turnover
- Similarity of catchment areas (distance weighting)
- Known patterns of expenditure flows (from the SERS study).

- 2.42 Using these factors Table 2.5C (as updated in this statement) assumes that 21.5% of comparison goods turnover diverted to the non-food discounter would be diverted from shops within the Arc (i.e. £0.85m). This can be compared to the equivalent figure for the remainder of the City Centre (58.5%) and can be compared to the estimated turnover of these locations identified in that Table:

- The Arc – 21.5% trade diversion = £0.85m from £91.8m comparison turnover – ratio = 0.93%
- Remainder of the City Centre – 58.5% trade diversion = £2.31m from £133.3m – ratio = 1.73%

- 2.43 The ratio between trade diversion from the Arc and the remainder of the City Centre reflects the difference in the retail offer between the Arc and the remainder of the City Centre and the extent to which the proposed Scenario C proposal (a non-food discounter) would compete with this existing floorspace. The large majority of comparison floorspace within the Arc is for fashion goods and, normally, limited floorspace is given to these goods in non-food discounters (Pep franchises in Poundland being the main exception but also some clothing is present in Original Factory Shops). It follows that the ratio of trade diversion to turnover should be significantly lower from the Arc than the remainder of the City Centre, especially given that the latter includes both a Poundland and Wilko. Taking these factors into account could suggest that, if anything, Table 2.C *overestimates* trade diversion from the Arc and, correspondingly, *underestimates* the amount from the remainder of the City Centre. The additional comments made by LSH regarding diversity in retail mix in non-food discounters do not affect these conclusions.

- 2.44 *However*, all of the above is immaterial since the key impact test is the impact that the proposed development will have on the vitality and viability of City Centre as a whole and, in this regard, it makes absolutely no difference whether more or less is diverted from the Arc and, correspondingly, less or more is diverted from the remainder of the City Centre, since, of course, the total amount diverted from the City Centre as a whole, remains the same.

### **Calculation of Retail Impact**

2.45 Calculated retail impacts use the same measures as identified for the original RIA but amended to reflect the update base and test years, that is:

- Turnover change 2022 (existing) compared to 2024 with the proposed development (i.e. cumulative impact taking into account expenditure change affecting existing floorspace).
- Turnover change in 2024 comparing the position with the proposed development and without the proposed development (no regard is given to changes between 2022 and 2024).
- Post impact (residual) sales densities for convenience and comparison goods.

2.46 The updated calculated impacts are set out in Tables 2.5A to 2.5C.

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

2014 Prices

	Convenience Goods					Comparison Goods					Total Trade Diversion All Goods
	2024 Turnover (Conv only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2024 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	£0.53m	1	4	0.0%	£0.00m						£0.00m
Comparison						£91.81m	2	4	23.0%	£0.45m	£0.45m
TOTAL	£0.53m			0.0%	£0.00m	£91.81m			23.0%	£0.45m	£0.45m
Robert Boby Retail Park											
Convenience	£22.45m	3	4	10.0%	£1.11m	£2.68m	1	4	0.5%	£0.01m	£1.12m
Comparison						£7.07m	2	4	1.5%	£0.03m	£0.03m
						£2.56m	1	4	0.0%	£0.00m	£0.00m
TOTAL	£22.45m			10.0%	£1.11m	£12.30m			2.0%	£0.04m	£1.15m
Remainder of City Centre											
Convenience	£15.96m	3	4	6.0%	£0.67m						£0.67m
Comparison						£120.95m	3	4	50.0%	£0.98m	£0.98m
TOTAL	£16.52m			6.0%	£0.67m	£120.95m			50.0%	£0.98m	£1.65m
TOTAL CITY CENTRE											
Convenience	£39.50m			16.0%	£1.78m						
Comparison						£225.07m			75.0%	£1.47m	
TOTAL	£39.50m			16.0%	£1.78m	£225.07m			75.0%	£1.47m	£0.00m
St Edmundsbury Retail Park											
Convenience											
All Comparison	£2.45m	2	5	1.0%	£0.11m	£31.47m	3	5	10.0%	£0.20m	£0.31m
	£2.45m			1.0%	£0.11m	£31.47m			10.0%	£0.20m	£0.31m
Bartons Retail Park											
Convenience	£2.02m	5	5	1.0%	£0.11m						£0.11m
Comparison						£2.24m	2	5	1.0%	£0.02m	£0.02m
	£2.02m			1.0%	£0.11m	£2.24m			1.0%	£0.02m	£0.13m
Other Major Foodstores											
Aldi	£23.05m	5	2	10.5%	£1.17m	£5.20m	5	2	1.5%	£0.03m	£1.20m
Asda	£41.91m	4	2	15.0%	£1.67m	£5.01m	4	2	1.0%	£0.02m	£1.69m
Co-op	£3.40m	3	2	1.0%	£0.11m	£0.41m	4	2	0.0%	£0.00m	£0.11m
Sainsbury's	£41.06m	4	5	35.0%	£3.89m	£4.91m	4	5	2.5%	£0.05m	£3.94m
Tesco	£40.32m	4	3	20.0%	£2.23m	£4.82m	4	3	1.5%	£0.03m	£2.26m
	£149.74m			81.5%	£9.07m	£20.34m			6.5%	£0.13m	
Other Major Non-Foodstores											
Matalan						£4.10m	2	5	1.0%	£0.02m	£0.02m
The Range						£9.03m	3	2	0.5%	£0.01m	£0.01m
B&M	£2.02m	2	2	0.5%	£0.06m	£5.36m	3	2	0.5%	£0.01m	£0.07m
Glasswells						£6.95m	1	2	0.0%	£0.00m	£0.00m
House of Harmony						£1.09m	1	5	0.0%	£0.00m	£0.00m
DJ Evans						£0.76m	1	4	0.0%	£0.00m	£0.00m
B&Q						£6.00m	1	4	0.5%	£0.01m	£0.01m
Miscellaneous Others						£39.30m	2	3	5.0%	£0.10m	£0.10m
Total	£2.02m			0.5%	£0.06m	£72.59m			£0.08m	£0.00m	£0.00m
PRIMARY CATCHMENT AREA TOTAL											
	£195.73m			100.0%	£11.13m	£351.71m			100.0%	£1.96m	£13.09m

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

2014 Prices

	Convenience Goods					Comparison Goods					Total Trade Diversion All Goods
	2024 Turnover (Conv only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2024 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	£0.53m	2	4	0.0%	£0.00m						£0.00m
Comparison						£91.81m	2	4	19.0%	£0.44m	£0.44m
TOTAL	£0.53m			0.0%	£0.00m	£91.81m			19.0%	£0.44m	£0.44m
Robert Boby Retail Park											
Convenience	£22.45m	5	4	15.0%	£1.24m	£2.68m	3	4	0.0%	£0.00m	£1.24m
Comparison	Waitrose					£7.07m	2	4	1.0%	£0.02m	£0.02m
	TK Maxx										
Halfords						£2.56m	1	4	0.0%	£0.00m	£0.00m
TOTAL	£22.45m			15.0%	£1.24m	£12.30m			1.0%	£0.02m	£1.26m
Remainder of City Centre											
Convenience	£15.96m	3	4	6.5%	£0.54m						£0.54m
Comparison						£120.95m	3	4	40.0%	£0.92m	£0.92m
TOTAL	£16.52m			6.5%	£0.54m	£120.95m			40.0%	£0.92m	£1.46m
TOTAL CITY CENTRE											
Convenience	£39.50m			21.5%	£1.78m						£1.78m
Comparison						£225.07m			60.0%	£1.38m	£1.38m
TOTAL	£39.50m			21.5%	£1.78m	£225.07m			60.0%	£1.38m	£3.16m
St Edmundsbury Retail Park											
Convenience											
All Comparison	£2.45m	2	5	0.5%	£0.04m	£31.47m	2	5	10.0%	£0.23m	£0.27m
	£2.45m			0.5%	£0.04m	£31.47m			10.0%	£0.23m	£0.27m
Bartons Retail Park											
Convenience	£2.02m	4	5	1.5%	£0.12m						£0.12m
Comparison	Farmfoods					£2.24m	2	5	0.5%	£0.01m	£0.01m
	£2.02m			1.5%	£0.12m	£2.24m			0.5%	£0.01m	£0.14m
Other Major Foodstores											
Aldi	£23.05m	4	2	7.0%	£0.58m	£5.20m	4	2	2.5%	£0.06m	£0.64m
Asda	£41.91m	5	2	14.0%	£1.16m	£5.01m	5	2	3.0%	£0.07m	£1.23m
Co-op	£3.40m	5	2	1.0%	£0.08m	£0.41m	5	2	0.0%	£0.00m	£0.08m
Sainsbury's	£41.06m	5	5	34.0%	£2.81m	£4.91m	5	5	6.0%	£0.14m	£2.95m
Tesco	£40.32m	5	3	20.0%	£1.65m	£4.82m	5	3	4.0%	£0.09m	£1.75m
	£149.74m			76.0%	£6.29m	£20.34m			15.5%	£0.36m	
Other Major Non-Foodstores											
Matalan						£4.10m	2	5	1.0%	£0.02m	£0.02m
The Range						£9.03m	3	2	1.0%	£0.02m	£0.02m
B&M	£2.02m	3	2	0.5%	£0.04m	£5.36m	3	2	1.0%	£0.02m	£0.06m
Glasswells						£6.95m	1	2	0.5%	£0.01m	£0.01m
House of Harmony						£1.09m	1	5	0.0%	£0.00m	£0.00m
DJ Evans						£0.76m	1	4	0.0%	£0.00m	£0.00m
B&Q						£6.00m	1	4	0.5%	£0.01m	£0.01m
Miscellaneous Others						£39.30m	2	3	10.0%	£0.23m	£0.23m
Total	£2.02m			0.5%	£0.04m	£72.59m			£0.14m	£0.00m	£0.00m
PRIMARY CATCHMENT AREA TOTAL											
	£195.73m			100.0%	£8.27m	£351.71m			100.0%	£2.30m	£10.58m

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

2014 Prices

	Convenience Goods					Comparison Goods					Total Trade Diversion All Goods
	2024 Turnover (Conv only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2024 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	£0.53m	1	4	0.0%	£0.00m						£0.00m
Comparison						£91.81m	2	4	21.5%	£0.85m	£0.85m
TOTAL	£0.53m			0.0%	£0.00m	£91.81m			21.5%	£0.85m	£0.85m
Robert Boby Retail Park											
Convenience	£22.45m	3	4	10.0%	£0.13m	£2.68m	1	4	0.5%	£0.02m	£0.15m
Comparison						£7.07m	3	4	2.5%	£0.10m	£0.10m
						£2.56m	2	4	0.5%	£0.02m	£0.02m
TOTAL	£22.45m			10.0%	£0.13m	£12.30m			3.5%	£0.14m	£0.27m
Remainder of City Centre											
Convenience	£15.96m	4	4	10.0%	£0.13m						£0.13m
Comparison						£120.95m	4	4	55.0%	£2.17m	£2.17m
TOTAL	£16.52m			10.0%	£0.13m	£120.95m			55.0%	£2.17m	£2.30m
TOTAL CITY CENTRE											
Convenience	£39.50m			20.0%	£0.26m						£0.26m
Comparison						£225.07m			80.0%	£3.16m	£3.16m
TOTAL	£39.50m			20.0%	£0.26m	£225.07m			80.0%	£3.16m	£3.42m
St Edmundsbury Retail Park											
Convenience											
All Comparison	£2.45m	5	5	2.0%	£0.03m	£31.47m	3	5	10.0%	£0.40m	£0.42m
	£2.45m			2.0%	£0.03m	£31.47m			10.0%	£0.40m	£0.42m
Bartons Retail Park											
Convenience	£2.02m	2	5	1.0%	£0.01m						£0.01m
Comparison						£2.24m	2	5	0.0%	£0.00m	£0.00m
	£2.02m			1.0%	£0.01m	£2.24m			0.0%	£0.00m	£0.01m
Other Major Foodstores											
Aldi	£23.05m	3	2	7.0%	£0.09m	£5.20m	3	2	1.0%	£0.04m	£0.13m
Asda	£41.91m	4	2	14.0%	£0.18m	£5.01m	3	2	0.5%	£0.02m	£0.20m
Co-op	£3.40m	4	2	1.0%	£0.01m	£0.41m	3	2	0.0%	£0.00m	£0.01m
Sainsbury's	£41.06m	4	5	34.0%	£0.45m	£4.91m	3	5	1.0%	£0.04m	£0.49m
Tesco	£40.32m	4	3	20.5%	£0.27m	£4.82m	3	3	1.0%	£0.04m	£0.31m
	£149.74m			76.5%	£1.01m	£20.34m			3.5%	£0.14m	
Other Major Non-Foodstores											
Matalan						£4.10m	2	5	0.5%	£0.02m	£0.02m
The Range						£9.03m	5	2	0.5%	£0.02m	£0.02m
B&M	£2.02m	5	2	0.5%	£0.01m	£5.36m	5	2	0.5%	£0.02m	£0.03m
Glasswells						£6.95m	1	2	0.0%	£0.00m	£0.00m
House of Harmony						£1.09m	1	5	0.0%	£0.00m	£0.00m
DJ Evans						£0.76m	1	4	0.0%	£0.00m	£0.00m
B&Q						£6.00m	1	4	0.0%	£0.00m	£0.00m
Miscellaneous Others						£39.30m	3	3	5.0%	£0.20m	£0.20m
Total	£2.02m			0.5%	£0.01m	£72.59m			7%	£0.00m	£0.00m
PRIMARY CATCHMENT AREA TOTAL											
	£195.73m			100.0%	£1.32m	£351.71m			100.0%	£3.95m	£5.27m

**TABLE 2.6A: CALCULATION OF RETAIL IMPACT- SCENARIO A - FOOD DISCOUNTER - UPDATED ASSESSMENT - APRIL 2022**

2014 Prices

	A	B	C	D	E	F	G
	2022 Existing Turnover (Without Proposed Dvpt)	2024 Turnover without Proposed Development	Trade Diversion (All Goods)	2024 Turnover with Proposed Development	Turnover Change 2022 with Dvpt v 2024 without Dvpt	Turnover Change 2024 with Dvpt v 2024 without Dvpt	Residual Turnover rate £psm
<b>BURY ST EDMUNDS CITY CENTRE</b>							<i>convenience goods only</i> <i>coomparison goods only</i>
<b>TOTAL CITY CENTRE</b>							
Convenience	£38.37m	£38.93m	£1.79m	£37.14m	-3.2%	-4.6%	£9,269psm
Comparison	£213.00m	£225.07m	£1.46m	£223.61m	+5.0%	-0.7%	£8,817psm
<b>TOTAL</b>	£251.38m	£264.00m	£3.25m	£260.75m	+3.7%	-1.2%	
<b>St Edmundsbury Retail Park</b>							
Convenience	£1.99m	£2.02m	£0.00m	£2.02m	+1.5%	+0.0%	
All Comparison	£31.78m	£33.49m	£0.31m	£33.19m	+4.4%	-0.9%	£2,980psm
	£33.77m	£35.52m	£0.31m	£35.21m	+4.3%	-0.9%	
<b>Bartons Retail Park</b>							
Convenience Farmfoods	£1.99m	£2.02m	£0.11m	£1.91m	-4.1%	-5.5%	£5,036psm
Comparison	£2.12m	£2.24m	£0.02m	£2.22m	+4.7%	-0.9%	£1,486psm
	£4.11m	£4.26m	£0.13m	£4.13m	+0.4%	-3.1%	
<b>Other Major Foodstores</b>							
Aldi	£28.83m	£29.47m	£1.20m	£28.27m	-1.9%	-4.1%	£24,310psm
Asda	£46.05m	£46.92m	£1.69m	£45.23m	-1.8%	-3.6%	£13,033psm
Co-op	£3.74m	£3.81m	£0.11m	£3.70m	-1.1%	-2.9%	£3,031psm
Sainsbury's	£45.11m	£45.97m	£3.94m	£42.02m	-6.9%	-8.6%	£12,470psm
Tesco	£44.29m	£45.13m	£2.26m	£42.88m	-3.2%	-5.0%	£11,528psm
	£168.03m	£171.30m	£9.20m	£162.10m	-3.5%	-5.4%	
<b>Other Major Non-Foodstores</b>							
Matalan	£3.88m	£4.10m	£0.02m	£4.08m	+5.2%	-0.5%	£1,787psm
The Range	£3.50m	£3.70m	£0.01m	£3.69m	+5.4%	-0.3%	£2,992psm
B&M	£6.55m	£6.84m	£0.07m	£6.77m	+3.4%	-1.0%	£3,477psm
Glasswells	£6.58m	£6.95m	£0.00m	£6.95m	+5.7%	+0.0%	£868psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+5.7%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.76m	£0.00m	£0.76m	+5.7%	+0.0%	£1,500psm
B&Q	£5.67m	£6.00m	£0.01m	£5.99m	+5.5%	-0.2%	£1,531psm
Miscellaneous Others	£42.76m	£45.18m	£0.10m	£45.08m	+5.4%	-0.2%	
<i>Proposed Development</i>			-£13.09m	£13.09m			
<b>Total</b>	£70.69m	£74.61m	-£12.89m	£87.50m	+23.8%	+17.3%	
<b>PRIMARY CATCHMENT AREA TOTAL</b>	£527.98m	£549.69m	£0.00m	£549.69m	+4.1%	+0.0%	

**TABLE 2.6B: CALCULATION OF RETAIL IMPACT- SCENARIO B - MID-SIZED SUPERMARKET - UPDATED ASSESSMENT - APRIL 2022**

2014 Prices

	A	B	C	D	E	F	G
	2022 Existing Turnover (Without Proposed Dvpt)	2024 Turnover without Proposed Development	Trade Diversion (All Goods)	2024 Turnover with Proposed Development	Turnover Change 2022 with Dvpt v 2024 without Dvpt	Turnover Change 2024 with Dvpt v 2024 without Dvpt	Residual Turnover rate £psm
<b>BURY ST EDMUNDS CITY CENTRE</b>							<i>convenience goods only</i> <i>comparison goods only</i>
<b>TOTAL CITY CENTRE</b>							
Convenience	£38.37m	£38.93m	£1.78m	£37.15m	-3.2%	-4.6%	£9,269psm
Comparison	£213.00m	£225.07m	£1.38m	£223.69m	+5.0%	-0.6%	£8,821psm
<b>TOTAL</b>	£251.38m	£264.00m	£3.16m	£260.84m	+3.8%	-1.2%	
<b>St Edmundsbury Retail Park</b>							
Convenience	£1.99m	£2.02m	£0.00m	£2.02m	+1.5%	+0.0%	
All Comparison	£31.78m	£33.49m	£0.27m	£33.22m	+4.5%	-0.8%	£2,977psm
	£33.77m	£35.52m	£0.27m	£35.24m	+4.4%	-0.8%	
<b>Bartons Retail Park</b>							
Convenience Farmfoods	£1.99m	£2.02m	£0.12m	£1.90m	-4.8%	-6.1%	£5,001psm
Comparison	£2.12m	£2.24m	£0.01m	£2.23m	+5.1%	-0.5%	£1,492psm
	£4.11m	£4.26m	£0.14m	£4.12m	+0.3%	-3.2%	
<b>Other Major Foodstores</b>							
Aldi	£28.83m	£29.47m	£0.64m	£28.83m	-0.0%	-2.2%	£24,946psm
Asda	£46.05m	£46.92m	£1.23m	£45.69m	-0.8%	-2.6%	£13,201psm
Co-op	£3.74m	£3.81m	£0.08m	£3.73m	-0.3%	-2.2%	£3,058psm
Sainsbury's	£45.11m	£45.97m	£2.95m	£43.01m	-4.7%	-6.4%	£12,839psm
Tesco	£44.29m	£45.13m	£1.75m	£43.39m	-2.1%	-3.9%	£11,704psm
	£168.03m	£171.30m	£6.64m	£164.65m	-2.0%	-3.9%	
<b>Other Major Non-Foodstores</b>							
Matalan	£3.88m	£4.10m	£0.02m	£4.08m	+5.1%	-0.6%	£1,785psm
The Range	£3.50m	£3.70m	£0.02m	£3.67m	+5.0%	-0.6%	£2,980psm
B&M	£6.55m	£6.84m	£0.06m	£6.77m	+3.4%	-0.9%	£3,467psm
Glasswells	£6.58m	£6.95m	£0.01m	£6.94m	+5.5%	-0.2%	£867psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+5.7%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.76m	£0.00m	£0.76m	+5.7%	+0.0%	£1,500psm
B&Q	£5.67m	£6.00m	£0.01m	£5.98m	+5.5%	-0.2%	£1,531psm
Miscellaneous Others	£42.76m	£45.18m	£0.23m	£44.95m	+5.1%	-0.5%	
<i>Proposed Development</i>			<i>-£10.58m</i>	<i>£10.58m</i>			
<b>Total</b>	£70.69m	£74.61m	-£10.21m	£84.83m	+20.0%	+13.7%	
<b>PRIMARY CATCHMENT AREA TOTAL</b>	£527.98m	£549.69m	£0.00m	£549.69m	+4.1%	+0.0%	

**TABLE 2.6C: CALCULATION OF RETAIL IMPACT- SCENARIO C - NON-FOOD DISCOUNTER - UPDATED ASSESSMENT - APRIL 2022**

2014 Prices

	A	B	C	D	E	F	G
	2022 Existing Turnover (Without Proposed Dvpt)	2024 Turnover without Proposed Development	Trade Diversion (All Goods)	2024 Turnover with Proposed Development	Turnover Change 2022 with Dvpt v 2024 without Dvpt	Turnover Change 2024 with Dvpt v 2024 without Dvpt	Residual Turnover rate £psm
<b>BURY ST EDMUNDS CITY CENTRE</b>							<i>convenience goods only</i> <i>comparison goods only</i>
<b>TOTAL CITY CENTRE</b>							
Convenience	£38.37m	£38.93m	£0.28m	£38.65m	+0.7%	-0.7%	£9,653psm
Comparison	£213.00m	£225.07m	£3.14m	£221.93m	+4.2%	-1.4%	£8,747psm
<b>TOTAL</b>	£251.38m	£264.00m	£3.42m	£260.58m	+3.7%	-1.3%	
<b>St Edmundsbury Retail Park</b>							
Convenience	£1.99m	£2.02m	£0.00m	£2.02m	+1.5%	+0.0%	
All Comparison	£31.78m	£33.49m	£0.42m	£33.07m	+4.1%	-1.3%	£2,960psm
	£33.77m	£35.52m	£0.42m	£35.09m	+3.9%	-1.2%	
<b>Bartons Retail Park</b>							
Convenience Farmfoods	£1.99m	£2.02m	£0.01m	£2.01m	+0.8%	-0.7%	£5,298psm
Comparison	£2.12m	£2.24m	£0.00m	£2.24m	+5.7%	+0.0%	£1,500psm
	£4.11m	£4.26m	£0.01m	£4.25m	+3.3%	-0.3%	
<b>Other Major Foodstores</b>							
Aldi	£28.83m	£29.47m	£0.13m	£29.34m	+1.7%	-0.4%	£25,471psm
Asda	£46.05m	£46.92m	£0.20m	£46.71m	+1.4%	-0.4%	£13,521psm
Co-op	£3.74m	£3.81m	£0.01m	£3.80m	+1.5%	-0.3%	£3,123psm
Sainsbury's	£45.11m	£45.97m	£0.49m	£45.48m	+0.8%	-1.1%	£13,645psm
Tesco	£44.29m	£45.13m	£0.31m	£44.82m	+1.2%	-0.7%	£12,129psm
	£168.03m	£171.30m	£1.15m	£170.15m	+1.3%	-0.7%	
<b>Other Major Non-Foodstores</b>							
Matalan	£3.88m	£4.10m	£0.02m	£4.08m	+5.2%	-0.5%	£1,787psm
The Range	£3.50m	£3.70m	£0.02m	£3.68m	+5.1%	-0.5%	£2,983psm
B&M	£6.55m	£6.84m	£0.03m	£6.81m	+4.0%	-0.4%	£3,470psm
Glasswells	£6.58m	£6.95m	£0.00m	£6.95m	+5.7%	+0.0%	£868psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+5.7%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.76m	£0.00m	£0.76m	+5.7%	+0.0%	£1,500psm
B&Q	£5.67m	£6.00m	£0.00m	£6.00m	+5.7%	+0.0%	£1,534psm
Miscellaneous Others	£42.76m	£45.18m	£0.20m	£44.98m	+5.2%	-0.4%	
<i>Proposed Development</i>			£5.27m	£5.27m			
<b>Total</b>	£70.69m	£74.61m	£5.00m	£79.62m	+12.6%	+6.7%	
<b>PRIMARY CATCHMENT AREA TOTAL</b>	£527.98m	£549.69m	£0.00m	£549.69m	+4.1%	+0.0%	



## Sensitivity Tests

- 2.47 The same sensitivity tests have been adopted as used in the original RIA. The results of these are set out in Table 2.7.
- 2.48 It should be noted that the highest impacts are associated with highly unlikely scenarios, for example sales densities in Test 2A are at levels: 50%-60% *above* average trading levels for 2018-2021 for Scenario A (Food Discounter); 30%-65% *above* average levels for 2018-2021 for Scenario B (General Supermarket); and 27% to 32% *above* average levels for 2018-2020 for Scenario C (Non-food Discounter).
- 2.49 The differences in results compared to the original RIA are:
- Marginal reduction in net growth in real terms for all locations by 0.5% (e.g. central case for Bury St Edmunds City Centre reduces from growth of +4.1% to growth of +3.7%). This reflects the reduced forecasts of expenditure growth identified in Table 2.1 in this update compared to the original forecasts.
  - No material change in direct impacts (i.e. 2024 with proposal compared to 2024 without proposal) for any location.

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	
	2024 with Dvpt v 2022 without	2024 with Dvpt v 2022 without	2024 with Dvpt v 2022 without	2024 with Dvpt v 2024 without	2024 with Dvpt v 2022 without	2024 with Dvpt v 2024 without
<b>SCENARIO A - FOOD DISCOUNTER</b>						
1. Central Case	+3.7%	-1.2%	+4.3%	-0.9%	+0.4%	-3.1%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	+3.4%	-1.5%	+4.0%	-1.1%	-0.4%	-3.8%
2B. Reduce Turnover -25%	+4.1%	-0.9%	+4.5%	-0.6%	+1.2%	-2.3%
3. Assume 90% of turnover is drawn from PCA	+3.9%	-1.1%	+4.3%	-0.8%	+0.8%	-2.8%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	+4.2%	-0.8%	+3.7%	-1.4%	-0.2%	-3.7%
4A: Increase trade diversion from City Centre by 33%	+3.3%	-1.6%	+4.9%	-0.3%	+1.1%	-2.5%
<b>SCENARIO B - MID-SIZE SUPERMARKET</b>						
1. Central Case	+3.8%	-1.2%	+4.4%	-0.8%	+0.3%	-3.2%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	+3.5%	-1.5%	+4.2%	-1.0%	-0.5%	-4.0%
2B. Reduce Turnover -25%	+4.1%	-0.9%	+4.6%	-0.6%	+1.2%	-2.4%
3. Assume 90% of turnover is drawn from PCA	+3.9%	-1.1%	+4.4%	-0.7%	+0.7%	-2.9%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	+4.2%	-0.8%	+4.0%	-1.1%	-0.1%	-3.6%
4A: Increase trade diversion from City Centre by 33%	+3.4%	-1.6%	+4.7%	-0.4%	+0.7%	-2.8%
<b>SCENARIO C - NON-FOOD DISCOUNTER</b>						
1. Central Case	+3.7%	-1.2%	+3.3%	-1.7%	+3.3%	-0.3%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	+3.4%	-1.5%	+2.9%	-2.2%	+3.2%	-0.4%
2B. Reduce Turnover -25%	+4.1%	-0.9%	+3.8%	-1.3%	+3.4%	-0.2%
3. Assume 90% of turnover is drawn from PCA	+3.9%	-1.1%	+3.5%	-1.6%	+3.3%	-0.3%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	+4.1%	-0.9%	+2.4%	-2.7%	+3.3%	-0.3%
4A: Increase trade diversion from City Centre by 33%	+3.3%	-1.6%	+5.1%	-0.1%	+3.3%	-0.3%
<i>(max trade diversion from CC for comp goods = 100%)</i>						
Range	+3% to +4%	-1% to -2%	+3% to +5%	-3% to -0%	-1% to +3%	-0% to -4%

## Conclusion – RIA Update

- 2.50 This update of the RIA has taken into account the latest available forecasts of expenditure growth, including effects on the role of special forms of trading arising from the impact of social restriction measures associated with the Covid-19 pandemic. As with the original RIA, it also takes into account changes of occupied floorspace within the City Centre and the effect of comparison floorspace developed since the completion of the SERS report in 2016. The update has also revised the base and test dates to reflect time elapsed since the original RIA was prepared.
- 2.51 The update has confirmed that sales densities adopted for the proposed development scenarios are significantly in excess of observed recent average sales densities and is, therefore, a robust and reliable assessment in this respect.
- 2.52 The update identifies only marginal changes in calculated retail impacts and these are solely associated with the reduced rate of growth forecast between the base year and test year. In all scenarios and sensitivity tests the turnover of Bury St Edmunds City Centre will *increase (by 3-4%) even with the operation of retail use within the Easlea Road unit* and this applies to all of the original three development scenarios. The following section considers additional potential development scenarios based on named operators and an additional category of retail operation. Given the relative strength of Bury St Edmund City Centre, the minimal level of direct retail impact arising, the strength of post impact sales densities and the fact that the turnover of the City Centre would continue to grow even with the proposed development, it is concluded that none of the retail development scenarios examined in this assessment will have any adverse impact on the vitality or viability of the City Centre nor any other location protected by retail planning policy.

## 3 Additional Scenarios

### Introduction

- 3.1 In their letter of 11<sup>th</sup> October 2021 reviewing the RIA LSH indicated that, in their view, further consideration should be given to the potential occupation of the unit by the following named operators:
- M&S Foodhall
  - Wilko
  - Poundland
- 3.2 In response to this it should be noted that, as LSH will be aware, the planning system is not concerned with individual operators and that personal planning consents should be issued only in exceptional circumstances. Planning is, primarily, concerned with the proposed land use and the physical form of the proposed development (and its consequential impacts on the physical, social and economic environments). Planning control for retail developments is normally exercised through restrictions on the gross or net floorspace of the proposed development, minimum/maximum sizes of units and/or restrictions regarding the range of goods permitted to be sold.
- 3.3 However, the applicants have accepted that, in order to provided the planning authority with the confidence that the proposed development would not affect the vitality or viability of any protected centre, they have instructed HPL to undertake additional scenarios based on named operators/additional retail subcategories. These are:
- Scenario D: Operation by a Frozen Food specialist operator (such as Iceland/Food Warehouse; Farmfoods or Heron Foods)
  - Scenario E: Named operator Wilko
  - Scenario F: Named operator Poundland
- 3.4 An assessment based on the operation of the retail unit for an M&S Foodhall has not been undertaken on the grounds that M&S have confirmed to the applicants that they are not willing to consider occupation of the unit because the characteristics of the unit (size, configuration and location) do not meet their operational requirements. Confirmation of this is being sought and will be submitted as soon as this is received by the agents for the planning application. In addition it should be noted that M&S's town centre unit, at 23 Buttermarket, is owned by M&S (i.e. not leased) and, on that basis, it is evident that this is not a unit that M&S would readily vacate in favour of a medium sized, sub-optimally configured and peripherally located unit at the application site.
- 3.5 The method for undertaking these additional scenarios follows that adopted for Scenarios A-C and therefore, only the key issues associated with each Scenario are explained in the text accompanying the retail impact assessment tables. It is confirmed that Scenarios D-F are based on the updated existing turnover estimates and expenditure set out in Section 2 above.
- 3.6 Table 2.3X summarises the characteristics of each of the six scenarios tested for the proposed development. Table numbering keeps the same as used in the original RIA for consistency (i.e. tables are 2.x etc).

**TABLE 2.3X: DEVELOPMENT SCENARIOS**

<b>Option</b>		<b>Scenario A</b> <i>Food Discounter</i> Sq M	<b>Scenario B</b> <i>Mid-Size Supermarket</i> Sq M	<b>Scenario C</b> <i>Non-Food Discounter</i> Sq M	<b>Scenario D</b> <i>Freezer Food Retailer</i> Sq M	<b>Scenario E</b> <i>Wilko</i> Sq M	<b>Scenario F</b> <i>Poundland</i> Sq M
Convenience	Net	992	700	313	1167	0	250
	Gross	1417	1167	417	1667	0	333
General Comparison	Net	175	300	688	0	1000	850
	Gross	250	500	917	0	1317	1084
Bulky Goods	Net	0	0	250	0	250	150
	Gross	0	0	333	0	350	250
Total	Net	1167	1000	1250	1167	1250	1250
	Gross	1667	1667	1667	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  
Scenario D: Based on attributes of Iceland and Farmfoods/Food Warehouse, Heron Foods  
Scenario E: Based on attributes of Wilko  
Scenario F: Based on attributes of Poundland

## Scenario D: Freezer Food Retailer

### Floorspace and Turnover

3.7 Table 2.4D identifies the floorspace and turnover of Scenario D.

**TABLE 2.4D: PROPOSED DEVELOPMENT - SCENARIO D - FREEZER FOOD RETAILER**

2014 Prices

	GFA	NFA	Turnover Rate	Total Turnover 2024
<b>Total Floorspace &amp; Turnover</b>				
Convenience	1667	1167	£7,000	£8.17m
General Comparison	0	0		£0.00m
Bulky Goods	0	0		£0.00m
<b>Total</b>	<b>1667</b>	<b>1167</b>		<b>£8.17m</b>
	<b>1667</b>	<b>1167</b>		<b>£8.17m</b>

#### Notes:

Turnover assumptions:	£psm	Average of stores from Retail Rankings 2021/Globaldata 2018-2021
Freezer Food Retailer	6317	Iceland/Food Warehouse, Farmfoods, Heron - 2014 Prices

3.8 Table D presents a similar analysis to that provided in Section 2 for Scenarios A to C of sales densities for the three principal freezer food operators in the UK market. With the exception of 2019 the proposed sales density adopted for the test year is at, or significantly above, average sales densities for this subsector of convenience goods retail. It is clear that there is considerable variation in the recorded sales densities for 2018-2021 for these operators and the high increase recorded for Heron between 2018 and 2019 and then failure to provide comparable data for 2020 appears anomalous. On this basis it is considered that the reference turnover best considered is the average for all operators for the whole of 2018-2021, which is £6317psm (2014 prices). The adopted sales density for Scenario D is £7000 psm which is 11% higher than this reference level. This sales density is therefore considered appropriate for a robust assessment of potential impacts. Sensitivity test 2A (see Table 2.8) adopts a rate which is 39% higher than the reference rate..

**Table D: Scenario D Sales Densities Comparators**

	Iceland/FW £psm	Farmfoods £psm	Heron £psm	Average £psm	Ratio of Scenario £psm to Average
<b>1. Current Prices</b>					
2021 Retail Rankings					
2018	7502	5687	5578	6256	
2019	7396	5620	9850	7622	
2020	7301	5424	n/a	6363	
Globaldata (est) 2021 (inc VAT)					
Conv	7568	n/a	n/a	7568	
Comp	2651	n/a	n/a	2651	
All Goods (95/5)	7322	n/a	n/a	7322	
<b>2 2014 Prices</b>					
2021 Retail Rankings					
2018	7202	5460	5355	6005	117%
2019	6975	5300	9289	7188	97%
2020	6805	5055	n/a	5930	118%
Globaldata (est) 2021 (inc VAT): Iceland Only					
Conv	7033	n/a	n/a	7033	100%
Comp	2598	n/a	n/a	2598	n/a
All Goods (80/20)	6146	n/a	n/a	6146	114%

3.9 Table 2.5D sets out the trade diversion assumptions and Table 2.6D calculated retail impacts using the same measures identified earlier.

3.10 The significance of retail impacts arising from all three additional scenarios is reviewed in the final part of this section.

TABLE 2.5D: DERIVATION OF TRADE DIVERSION - SCENARIO D - FREEZER FOOD RETAILER

2014 Prices

	Convenience Goods					Comparison Goods					Total Trade Diversion All Goods
	2024 Turnover (Conv only)	Similarity of Offer	Percent	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2024 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	£0.53m	1	0.1%	0.0%	£0.00m	£91.81m	2	4	23.0%	£0.00m	£0.00m
Comparison											
TOTAL	£0.53m			0.0%	£0.00m	£91.81m			23.0%	£0.00m	£0.00m
Robert Bobby Retail Park											
Convenience	£22.45m	3	10.8%	10.0%	£0.82m	£2.68m	1	4	0.5%	£0.00m	£0.82m
Comparison						£7.07m	2	4	1.5%	£0.00m	£0.00m
						£2.56m	1	4	0.0%	£0.00m	£0.00m
TOTAL	£22.45m			10.0%	£0.82m	£12.30m			2.0%	£0.00m	£0.82m
Remainder of City Centre											
Convenience	£15.96m	4	10.2%	10.0%	£0.82m						£0.82m
Comparison											
	Poundland	1	0.1%	0.0%	£0.00m	£1.18m	3	4	0.0%	£0.00m	£0.00m
	Wilko					£5.94m	3	4	2.0%	£0.00m	£0.00m
Others						£113.82m	3	4	48.0%	£0.00m	£0.00m
All Comparison	£0.57m			0.0%	£0.00m	£120.95m			50.0%	£0.00m	£0.00m
TOTAL	£16.52m			10.0%	£0.82m	£120.95m			50.0%	£0.00m	£0.82m
TOTAL CITY CENTRE											
Convenience	£39.50m			20.0%	£1.63m						£1.63m
Comparison						£225.07m			75.0%	£0.00m	£0.00m
TOTAL	£39.50m			20.0%	£1.63m	£225.07m			75.0%	£0.00m	£1.63m
St Edmundsbury Retail Park											
Convenience											
All Comparison	£2.45m	1	0.5%	0.0%	£0.00m	£31.47m	3	5	10.0%	£0.00m	£0.00m
	£2.45m			1.0%	£0.00m	£31.47m			10.0%	£0.00m	£0.00m
Bartons Retail Park											
Convenience	£2.02m	5	2.0%	4.0%	£0.33m						£0.33m
Comparison						£2.24m	2	5	1.0%	£0.00m	£0.00m
						£2.24m			1.0%	£0.00m	£0.33m
Other Major Foodstores											
Aldi	£23.05m	5	9.3%	9.0%	£0.74m	£5.20m	5	2	1.5%	£0.00m	£0.74m
Asda	£41.91m	4	13.5%	15.0%	£1.23m	£5.01m	4	2	1.0%	£0.00m	£1.23m
Co-op	£3.40m	3	0.8%	0.0%	£0.00m	£0.41m	4	2	0.0%	£0.00m	£0.00m
Sainsbury's	£41.06m	4	33.0%	32.0%	£2.61m	£4.91m	4	5	2.5%	£0.00m	£2.61m
Tesco	£40.32m	4	19.4%	19.5%	£1.59m	£4.82m	4	3	1.5%	£0.00m	£1.59m
	£149.74m			74.5%	£6.17m	£20.34m			6.5%	£0.00m	£6.17m
Other Major Non-Foodstores											
Matalan						£4.10m	2	5	1.0%	£0.00m	£0.00m
The Range						£9.03m	3	2	0.5%	£0.00m	£0.00m
B&M	£2.02m	2	0.3%	0.5%	£0.04m	£5.36m	3	2	0.5%	£0.00m	£0.04m
Glasswells						£6.95m	1	2	0.0%	£0.00m	£0.00m
House of Harmony						£1.09m	1	5	0.0%	£0.00m	£0.00m
DJ Evans						£0.76m	1	4	0.0%	£0.00m	£0.00m
B&Q						£6.00m	1	4	0.5%	£0.00m	£0.00m
Miscellaneous Others						£39.30m	2	3	5.0%	£0.00m	£0.00m
Total	£2.02m			0.5%	£0.04m	£72.59m			£0.08m	£0.00m	£0.04m
PRIMARY CATCHMENT AREA TOTAL											
	£195.73m		100.0%	100.0%	£8.17m	£351.71m			100.0%	£0.00m	£8.17m



TABLE 2.6D: CALCULATION OF RETAIL IMPACT- SCENARIO D - FREEZER FOOD RETAILER

2014 Prices

	A	B	C	D	E	F	G
	2022 Existing Turnover (Without Proposed Dvpt)	2024 Turnover without Proposed Development	Trade Diversion (All Goods)	2024 Turnover with Proposed Development	Turnover Change 2022 with Dvpt v 2024 without Dvpt	Turnover Change 2024 with Dvpt v 2024 without Dvpt	Residual Turnover rate £psm
<b>BURY ST EDMUNDS CITY CENTRE</b>							<i>convenience goods only</i> <i>comparison goods only</i>
<b>The Arc</b>							
Convenience	£0.52m	£0.53m	£0.00m	£0.53m	+1.5%	+0.0%	£8,863psm
Comparison	£86.89m	£91.81m	£0.00m	£91.81m	+5.7%	+0.0%	£11,883psm
<b>TOTAL</b>	£87.42m	£92.35m	£0.00m	£92.35m	+5.6%	+0.0%	
<b>Robert Bobby Retail Park</b>							
Convenience Waitrose	£24.66m	£25.13m	£0.82m	£24.31m	-1.4%	-3.3%	£11,588psm
Comparison TK Maxx	£6.69m	£7.07m	£0.00m	£7.07m	+5.7%	+0.0%	£4,434psm
Halfords	£2.42m	£2.56m	£0.00m	£2.56m	+5.7%	+0.0%	£3,471psm
<b>TOTAL</b>	£33.77m	£34.75m	£0.82m	£33.93m	+0.5%	-2.4%	
<b>Remainder of City Centre</b>							
Convenience	£15.73m	£15.96m	£0.82m	£15.14m	-3.7%	-5.1%	£7,832psm
Comparison							
Poundland	£1.68m	£1.75m	£0.00m	£1.75m	+4.3%	+0.0%	£4,066psm
Wilko	£5.63m	£5.94m	£0.00m	£5.94m	+5.7%	+0.0%	£2,642psm
Others	£107.72m	£113.82m	£0.00m	£113.82m	+5.7%	+0.0%	£9,777psm
All Comparison	£115.02m	£121.52m	£0.00m	£121.52m	+5.6%	+0.0%	£8,484psm
<b>TOTAL</b>	£130.75m	£137.47m	£0.82m	£136.66m	+4.5%	-0.6%	
<b>TOTAL CITY CENTRE</b>							
Convenience	£38.93m	£39.50m	£1.63m	£37.87m	-2.7%	-4.1%	£9,795psm
Comparison	£213.00m	£225.07m	£0.00m	£225.07m	+5.7%	+0.0%	£8,747psm
<b>TOTAL</b>	£251.94m	£264.57m	£1.63m	£262.94m	+4.4%	-0.6%	
<b>St Edmundsbury Retail Park</b>							
Convenience	£2.41m	£2.45m	£0.00m	£2.45m	+1.5%	+0.0%	
All Comparison	£32.20m	£33.92m	£0.00m	£33.92m	+5.4%	+0.0%	£2,960psm
	£34.61m	£36.36m	£0.00m	£36.36m	+5.1%	+0.0%	
<b>Bartons Retail Park</b>							
Convenience Farmfoods	£1.99m	£2.02m	£0.33m	£1.69m	-14.9%	-16.2%	£5,298psm
Comparison	£2.12m	£2.24m	£0.00m	£2.24m	+5.7%	+0.0%	£1,500psm
	£4.11m	£4.26m	£0.33m	£3.93m	-4.3%	-7.7%	
<b>Other Major Foodstores</b>							
Aldi	£27.64m	£28.25m	£0.74m	£27.52m	-0.5%	-2.6%	£24,416psm
Asda	£46.05m	£46.92m	£1.23m	£45.69m	-0.8%	-2.6%	£13,521psm
Co-op	£3.74m	£3.81m	£0.00m	£3.81m	+1.9%	+0.0%	£3,123psm
Sainsbury's	£45.11m	£45.97m	£2.61m	£43.35m	-3.9%	-5.7%	£13,645psm
Tesco	£44.29m	£45.13m	£1.59m	£43.54m	-1.7%	-3.5%	£12,129psm
	£166.84m	£170.08m	£6.17m	£163.91m	-1.8%	-3.6%	
<b>Other Major Non-Foodstores</b>							
Matalan	£3.88m	£4.10m	£0.00m	£4.10m	+5.7%	+0.0%	£1,787psm
The Range	£8.54m	£9.03m	£0.00m	£9.03m	+5.7%	+0.0%	£1,896psm
B&M	£7.07m	£7.38m	£0.04m	£7.34m	+3.9%	-0.6%	£3,471psm
Glasswells	£6.58m	£6.95m	£0.00m	£6.95m	+5.7%	+0.0%	£868psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+5.7%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.76m	£0.00m	£0.76m	+5.7%	+0.0%	£1,500psm
B&Q	£5.67m	£6.00m	£0.00m	£6.00m	+5.7%	+0.0%	£1,534psm
Miscellaneous Others	£37.20m	£39.30m	£0.00m	£39.30m	+5.7%	+0.0%	
Proposed Development			-£8.17m	£5.27m			
Total	£70.69m	£74.61m	-£8.13m	£79.84m	+12.9%	+7.0%	
<b>PRIMARY CATCHMENT AREA TOTAL</b>	£528.18m	£549.89m	£0.00m	£546.98m	+3.6%	-0.5%	

## Scenario E: Wilko Non-Food Discounter

- 3.11 Wilko occupies a large unit (3245 sq m – *source: Valuation Office Agency*) in a secondary location at the west end of Risbygate Street. This unit benefits from surface level car parking adjacent to the store (St Andrew's Car Park).
- 3.12 The current application would provide a unit that is less than half the gross floor area of the existing store and the car parking provision would be no better than Wilko's current store. In this scenario, therefore, it is assumed that Wilko would only consider the application site at Easlea Road as part of a two-store strategy for the town, i.e. the significantly larger City Centre store would continue to trade. The alternative, that Wilko relocates from a large City Centre store with high quality parking to a much smaller unit, which is a conversion from a gym, could only be countenanced if the existing Wilko is trading very poorly and they have too much space in the existing unit. However, this is implausible because, first there is no indication that the Risbygate Street Wilko is trading poorly and, secondly, it would be relatively straightforward for Wilko to subdivide the existing store and retain the benefit of easy access to St Andrews Street car park and retain a City Centre location.
- 3.13 It can be confirmed that, to date, there has been no indication that Wilko are interested in the Easlea Road unit which reflects a relative lack of development/new store activity by Wilko nationally. Furthermore the applicants confirm that, due to Wilko's weak covenant, they would not be willing to have Wilko as a tenant for the Easlea Road site. Therefore, this scenario must be regarded as purely hypothetical.

### Floorspace and Turnover

- 3.14 Table 2.4E identifies the floorspace and turnover of Scenario E.

**TABLE 2.4E: PROPOSED DEVELOPMENT - SCENARIO E - WILKO NON-FOOD DISCOUNT**  
2014 Prices

	GFA	NFA	Turnover Rate	Total Turnover 2024
<b>Total Floorspace &amp; Turnover</b>				
Convenience	0	0	£2,500	£0.00m
General Comparison	1317	1000	£2,500	£2.50m
Bulky Goods	350	250	£2,500	£0.63m
<b>Total</b>	<b>1667</b>	<b>1250</b>		<b>£3.13m</b>
	<b>1667</b>	<b>1250</b>		<b>£3.13m</b>

### Notes:

Turnover assumptions:	£psm	Average of stores from Retail Rankings 2021 for 2018-2020	2014 prices
Unit: Non-Food Discounter	2174	Wilko	

- 3.15 Table E presents a similar analysis to that provided in Section 2 for Scenarios A to C of sales densities of Wilko for 2018-2020. It should be noted that Wilko's sales densities are declining (a factor underpinning their weak

covenant). The sales density adopted for 2024 is £2500 psm which is 24% above the most recent sales density information for 2020. This sales density is therefore considered appropriate for a robust assessment of potential impacts. Sensitivity test 2A (see Table 2.8) adopts a rate 55% above the Retail Rankings rate for Wilko.

**Table E: Scenario E Sales Densities Comparators**

	Wilko	Average	Ratio of Scenario £psm to Average
<i>1. Current Prices</i>			
2021 Retail Rankings			
2018	2390	2390	
2019	2199	2199	
2020	2070	2070	
<i>2 2014 Prices</i>			
2021 Retail Rankings			
2018	2347	2347	107%
2019	2153	2153	116%
2020	2023	2023	124%

3.16 Table 2.5E sets out the trade diversion assumptions and Table 2.6E calculated retail impacts using the same measures identified earlier.

3.17 The significance of retail impacts arising from all three additional scenarios is reviewed in the final part of this section.

TABLE 2.5E: DERIVATION OF TRADE DIVERSION - SCENARIO E - WILKO NON-FOOD DISCOUNTER

2014 Prices

	Convenience Goods			Comparison Goods					Total Trade Diversion All Goods	
	2024 Turnover (Conv only)	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2024 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	£0.53m	0.0%	£0.00m						£0.00m	
Comparison				£91.81m	0	4	0.0%	£0.00m	£0.00m	
TOTAL	£0.53m	0.0%	£0.00m	£91.81m			0.0%	£0.00m	£0.00m	
Robert Bobby Retail Park										
Convenience	£22.45m	0.0%	£0.00m	£2.68m	0	4	0.0%	£0.00m	£0.00m	
Comparison				£7.07m	0	4	0.0%	£0.00m	£0.00m	
				£2.56m	0	4	0.0%	£0.00m	£0.00m	
TOTAL	£22.45m	0.0%	£0.00m	£12.30m			0.0%	£0.00m	£0.00m	
Remainder of City Centre										
Convenience	£15.96m	0.0%	£0.00m						£0.00m	
Comparison										
	Poundland	£0.57m	0.0%	£0.00m	£1.18m	5	4	2.5%	£0.08m	£0.08m
	Wilko				£5.94m	5	4	50.0%	£1.56m	£1.56m
	Others				£113.82m	0.5	4	10.0%	£0.31m	£0.31m
All Comparison	£0.57m	0.0%	£0.00m	£120.95m			62.5%	£1.95m	£1.95m	
TOTAL	£16.52m	0.0%	£0.00m	£120.95m			62.5%	£1.95m	£1.95m	
TOTAL CITY CENTRE										
Convenience	£39.50m	0.0%	£0.00m						£0.00m	
Comparison				£225.07m			62.5%	£1.95m	£1.95m	
TOTAL	£39.50m	0.0%	£0.00m	£225.07m			62.5%	£1.95m	£1.95m	
St Edmundsbury Retail Park										
Convenience										
All Comparison	£2.45m	0.0%	£0.00m	£31.47m	5	5	32.0%	£1.00m	£1.00m	
	£2.45m	0.0%	£0.00m	£31.47m			32.0%	£1.00m	£1.00m	
Bartons Retail Park										
Convenience	£2.02m	0.0%	£0.00m						£0.00m	
Comparison				£2.24m	0	5	0.0%	£0.00m	£0.00m	
	£2.02m	0.0%	£0.00m	£2.24m			0.0%	£0.00m	£0.00m	
Other Major Foodstores										
Aldi	£23.05m	0.0%	£0.00m	£5.20m	1	2	0.0%	£0.00m	£0.00m	
Asda	£41.91m	0.0%	£0.00m	£5.01m	1	2	1.0%	£0.03m	£0.03m	
Co-op	£3.40m	0.0%	£0.00m	£0.41m	1	2	0.0%	£0.00m	£0.00m	
Sainsbury's	£41.06m	0.0%	£0.00m	£4.91m	1	5	1.0%	£0.03m	£0.03m	
Tesco	£40.32m	0.0%	£0.00m	£4.82m	1	3	1.0%	£0.03m	£0.03m	
	£149.74m	0.0%	£0.00m	£20.34m			3.0%	£0.09m	£0.09m	
Other Major Non-Foodstores										
Matalan				£4.10m	0	5	0.0%	£0.00m	£0.00m	
The Range				£9.03m	5	2	1.5%	£0.05m	£0.05m	
B&M	£2.02m	0.0%	£0.00m	£5.36m	5	2	1.0%	£0.03m	£0.03m	
Glasswells				£6.95m	0	2	0.0%	£0.00m	£0.00m	
House of Harmony				£1.09m	0	5	0.0%	£0.00m	£0.00m	
DJ Evans				£0.76m	0	4	0.0%	£0.00m	£0.00m	
B&Q				£6.00m	0	4	0.0%	£0.00m	£0.00m	
Miscellaneous Others				£39.30m	0	3	0.0%	£0.00m	£0.00m	
Total	£2.02m	0.0%	£0.00m	£72.59m			3%	£0.08m	£0.08m	
PRIMARY CATCHMENT AREA TOTAL	£195.73m	0.0%	£0.00m	£351.71m			100.0%	£3.13m	£3.13m	

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

2014 Prices

	A	B	C	D	E	F	G
	2022 Existing Turnover (Without Proposed Dvpt)	2024 Turnover without Proposed Development	Trade Diversion (All Goods)	2024 Turnover with Proposed Development	Turnover Change 2022 with Dvpt v 2024 without Dvpt	Turnover Change 2024 with Dvpt v 2024 without Dvpt	Residual Turnover rate £psm
<b>BURY ST EDMUNDS CITY CENTRE</b>							<i>convenience goods only</i> <i>comparison goods only</i>
<b>The Arc</b>							
Convenience	£0.52m	£0.53m	£0.00m	£0.53m	+1.5%	+0.0%	£8,863psm
Comparison	£86.89m	£91.81m	£0.00m	£91.81m	+5.7%	+0.0%	£11,883psm
<b>TOTAL</b>	£87.42m	£92.35m	£0.00m	£92.35m	+5.6%	+0.0%	
<b>Robert Bobby Retail Park</b>							
Convenience Waitrose	£24.66m	£25.13m	£0.00m	£25.13m	+1.9%	+0.0%	£11,588psm
Comparison TK Maxx	£6.69m	£7.07m	£0.00m	£7.07m	+5.7%	+0.0%	£4,434psm
Halfords	£2.42m	£2.56m	£0.00m	£2.56m	+5.7%	+0.0%	£3,471psm
<b>TOTAL</b>	£33.77m	£34.75m	£0.00m	£34.75m	+2.9%	+0.0%	
<b>Remainder of City Centre</b>							
Convenience	£15.73m	£15.96m	£0.00m	£15.96m	+1.5%	+0.0%	£7,832psm
Comparison							
Poundland	£1.68m	£1.75m	£0.08m	£1.67m	-0.4%	-4.5%	£3,885psm
Wilko	£5.63m	£5.94m	£1.56m	£4.38m	-22.1%	-26.3%	£1,947psm
Others	£107.72m	£113.82m	£0.31m	£113.51m	+5.4%	-0.3%	£9,750psm
All Comparison	£115.02m	£121.52m	£1.95m	£119.56m	+3.9%	-1.6%	£8,348psm
<b>TOTAL</b>	£130.75m	£137.47m	£1.95m	£135.52m	+3.6%	-1.4%	
<b>TOTAL CITY CENTRE</b>							
Convenience	£38.93m	£39.50m	£0.00m	£39.50m	+1.5%	+0.0%	£9,795psm
Comparison	£213.00m	£225.07m	£1.95m	£223.11m	+4.7%	-0.9%	£8,747psm
<b>TOTAL</b>	£251.94m	£264.57m	£1.95m	£262.62m	+4.2%	-0.7%	
<b>St Edmundsbury Retail Park</b>							
Convenience	£2.41m	£2.45m	£0.00m	£2.45m	+1.5%	+0.0%	
All Comparison	£32.20m	£33.92m	£1.00m	£32.92m	+2.2%	-2.9%	£2,960psm
	£34.61m	£36.36m	£1.00m	£35.36m	+2.2%	-2.8%	
<b>Bartons Retail Park</b>							
Convenience Farmfoods	£1.99m	£2.02m	£0.00m	£2.02m	+1.5%	+0.0%	£5,298psm
Comparison	£2.12m	£2.24m	£0.00m	£2.24m	+5.7%	+0.0%	£1,500psm
	£4.11m	£4.26m	£0.00m	£4.26m	+3.6%	+0.0%	
<b>Other Major Foodstores</b>							
Aldi	£27.64m	£28.25m	£0.00m	£28.25m	+2.2%	+0.0%	£24,416psm
Asda	£46.05m	£46.92m	£0.03m	£46.89m	+1.8%	-0.1%	£13,521psm
Co-op	£3.74m	£3.81m	£0.00m	£3.81m	+1.9%	+0.0%	£3,123psm
Sainsbury's	£45.11m	£45.97m	£0.03m	£45.93m	+1.8%	-0.1%	£13,645psm
Tesco	£44.29m	£45.13m	£0.03m	£45.10m	+1.8%	-0.1%	£12,129psm
	£166.84m	£170.08m	£0.09m	£169.99m	+1.9%	-0.1%	
<b>Other Major Non-Foodstores</b>							
Matalan	£3.88m	£4.10m	£0.00m	£4.10m	+5.7%	+0.0%	£1,787psm
The Range	£8.54m	£9.03m	£0.05m	£8.98m	+5.1%	-0.5%	£1,896psm
B&M	£7.07m	£7.38m	£0.03m	£7.35m	+4.0%	-0.4%	£3,471psm
Glasswells	£6.58m	£6.95m	£0.00m	£6.95m	+5.7%	+0.0%	£868psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+5.7%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.76m	£0.00m	£0.76m	+5.7%	+0.0%	£1,500psm
B&Q	£5.67m	£6.00m	£0.00m	£6.00m	+5.7%	+0.0%	£1,534psm
Miscellaneous Others	£37.20m	£39.30m	£0.00m	£39.30m	+5.7%	+0.0%	
Proposed Development			-£3.13m	£5.27m			
Total	£70.69m	£74.61m	-£3.05m	£79.80m	+12.9%	+7.0%	
<b>PRIMARY CATCHMENT AREA TOTAL</b>	£528.18m	£549.89m	£0.00m	£552.03m	+4.5%	+0.4%	

## Scenario F: Poundland Non-Food Discounter

- 3.18 Poundland occupies a small-medium unit (571 sq m over two levels – *source: Valuation Office Agency*) in a prime location at Cornhill. This unit does not have direct access to surface level car parking.
- 3.19 The proposed development would provide a significantly larger unit than the existing Poundland with the benefit of surface level parking although its location in terms of potential footfall would be less attractive than the Cornhill store. In this scenario it has been assumed that Poundland would relocate from the City Centre to the application site since this is consistent with a worst-case analysis of potential retail impact.
- 3.20 It can be confirmed that, to date, there has been no indication that Poundland are interested in the Easlea Road unit. Therefore, this scenario must be regarded as hypothetical.

### Floorspace and Turnover

- 3.21 Table 2.4F identifies the floorspace and turnover of Scenario F.

**TABLE 2.4F: PROPOSED DEVELOPMENT - SCENARIO F - POUNDLAND NON-FOOD DISCOUN**  
2014 Prices

	GFA	NFA	Turnover Rate	Total Turnover 2024
<b>Total Floorspace &amp; Turnover</b>				
Convenience	333	250	£6,500	£1.625m
General Comparison	1084	850	£3,250	£2.76m
Bulky Goods	250	150	£3,250	£0.49m
<b>Total</b>	<b>1667</b>	<b>1250</b>	<b>£3,900</b>	<b>£4.88m</b>
	<b>1667</b>	<b>1250</b>		<b>£4.88m</b>

### Notes:

Turnover assumptions:	£psm	Average of stores from Retail Rankings 2021 Globaldata 2018-2021	2014 prices
Unit: Non-Food Discounter	3418	Poundland	

- 3.22 Table F presents a similar analysis to that provided in Section 2 for Scenarios A to C of sales densities of Poundland for 2018-2019 (2020 data is not available). It should be noted that Poundland's sales densities have been declining for a number of years (they were, for example, £4057 psm in 2014). The sales density adopted for 2024 is an average of £3900 psm which is 18% above the most recent sales density information for 2019. This sales density is therefore considered appropriate for a robust assessment of potential impacts. Sensitivity test 2A (see Table 2.8) adopts a rate 48% above the Retail Rankings rate for Poundland.

**Table F: Scenario F Sales Densities Comparators**

	Poundland	Average	Ratio of Scenario £psm to Average
<i>1. Current Prices</i>			
2021 Retail Rankings			
2018	3583	3583	
2019	3389	3389	
2020	n/a	n/a	
<i>2 2014 Prices</i>			
2021 Retail Rankings			
2018	3519	3519	111%
2019	3318	3318	118%
2020	n/a	n/a	n/a

3.23 Table 2.5F sets out the trade diversion assumptions and Table 2.6F calculated retail impacts using the same measures identified earlier.

3.24 The significance of retail impacts arising from all three additional scenarios is reviewed in the final part of this section.

## Sensitivity Tests

3.25 Table 2.8 sets out the results of the sensitivity tests for Scenarios D to F. These use the same tests that were provided for Scenarios A to C (see Table 2.7 page 19 above).

TABLE 2.5F: DERIVATION OF TRADE DIVERSION - SCENARIO F - POUNDLAND NON-FOOD DISCOUNTER

2014 Prices

	Convenience Goods					Comparison Goods					Total Trade Diversion All Goods
	2024 Turnover (Conv only)	Similarity of Offer	Distance Weight	Percent of Trade Diversion Convenience	Total Trade Diversion Convenience	2024 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	£0.53m	1	4	0.0%	£0.00m						£0.00m
Comparison						£91.81m	2	4	15.0%	£0.49m	£0.49m
TOTAL	£0.53m			0.0%	£0.00m	£91.81m			15.0%	£0.49m	£0.49m
Robert Boby Retail Park											
Convenience	£22.45m	3	4	7.5%	£0.12m	£2.68m	1	4	0.0%	£0.00m	£0.12m
Comparison						£7.07m	1	4	0.5%	£0.02m	£0.02m
						£2.56m	3	4	0.5%	£0.02m	£0.02m
TOTAL	£22.45m			7.5%	£0.12m	£12.30m			1.0%	£0.03m	£0.15m
Remainder of City Centre											
Convenience	£15.96m	4	4	10.0%	£0.16m						£0.16m
Comparison											
	£0.57m	Assume store closes		35.0%	£0.57m	£1.18m	Assume store closes		36.4%	£1.18m	£1.75m
						£5.94m	5	4	2.0%	£0.07m	£0.07m
						£113.82m	2	4	20.0%	£0.65m	£0.65m
All Comparison	£0.57m			35.0%	£0.57m	£120.95m			58.4%	£1.90m	£2.47m
TOTAL	£16.52m			45.0%	£0.73m	£120.95m			58.4%	£1.90m	£2.63m
TOTAL CITY CENTRE											
Convenience	£39.50m			52.5%	£0.85m						£0.85m
Comparison						£225.07m			74.4%	£2.42m	£2.42m
TOTAL	£39.50m			52.5%	£0.85m	£225.07m			74.4%	£2.42m	£3.27m
St Edmundsbury Retail Park											
Convenience											
All Comparison	£2.45m	5	5	2.0%	£0.03m	£31.47m	3	5	10.0%	£0.33m	£0.36m
	£2.45m			2.0%	£0.03m	£31.47m			10.0%	£0.33m	£0.36m
Bartons Retail Park											
Convenience	£2.02m	2	5	1.0%	£0.02m						£0.02m
Comparison						£2.24m	1	5	0.0%	£0.00m	£0.00m
	£2.02m			1.0%	£0.02m	£2.24m			0.0%	£0.00m	£0.02m
Other Major Foodstores											
Aldi	£23.05m	2	2	3.0%	£0.05m	£5.20m	1	2	0.0%	£0.00m	£0.05m
Asda	£41.91m	3	2	8.0%	£0.13m	£5.01m	3	2	0.5%	£0.02m	£0.15m
Co-op	£3.40m	3	2	1.0%	£0.02m	£0.41m	3	2	0.0%	£0.00m	£0.02m
Sainsbury's	£41.06m	3	5	20.0%	£0.33m	£4.91m	3	5	1.5%	£0.05m	£0.37m
Tesco	£40.32m	3	3	12.0%	£0.20m	£4.82m	3	3	1.0%	£0.03m	£0.23m
	£149.74m			44.0%	£0.72m	£20.34m			3.0%	£0.10m	£0.81m
Other Major Non-Foodstores											
Matalan						£4.10m	1	5	0.5%	£0.02m	£0.02m
The Range						£9.03m	5	2	2.0%	£0.07m	£0.07m
B&M	£2.02m	5	2	0.5%	£0.01m	£5.36m	5	2	1.5%	£0.05m	£0.06m
Glasswells						£6.95m	1	2	0.0%	£0.00m	£0.00m
House of Harmony						£1.09m	1	5	0.0%	£0.00m	£0.00m
DJ Evans						£0.76m	1	4	0.0%	£0.00m	£0.00m
B&Q						£6.00m	4	4	1.1%	£0.04m	£0.04m
Miscellaneous Others						£39.30m	3	3	7.5%	£0.24m	£0.24m
Total	£2.02m			0.5%	£0.01m	£72.59m			12.6%	£0.41m	£0.42m
PRIMARY CATCHMENT AREA TOTAL											
	£195.73m			100.0%	£1.625m	£351.71m			100.0%	£3.25m	£7.34m



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

2014 Prices

	A	B	C	D	E	F	G
	2022 Existing Turnover (Without Proposed Dvpt)	2024 Turnover without Proposed Development	Trade Diversion (All Goods)	2024 Turnover with Proposed Development	Turnover Change 2022 with Dvpt v 2024 without Dvpt	Turnover Change 2024 with Dvpt v 2024 without Dvpt	Residual Turnover rate £psm
<b>BURY ST EDMUNDS CITY CENTRE</b>							<i>convenience goods only</i> <i>comparison goods only</i>
<b>The Arc</b>							
Convenience	£0.52m	£0.53m	£0.00m	£0.53m	+1.5%	+0.0%	£8,863psm
Comparison	£86.89m	£91.81m	£0.49m	£91.33m	+5.1%	-0.5%	£11,883psm
<b>TOTAL</b>	£87.42m	£92.35m	£0.49m	£91.86m	+5.1%	-0.5%	
<b>Robert Bobby Retail Park</b>							
Convenience Waitrose	£24.66m	£25.13m	£0.12m	£25.00m	+1.4%	-0.5%	£11,588psm
Comparison TK Maxx	£6.69m	£7.07m	£0.02m	£7.05m	+5.4%	-0.2%	£4,434psm
Halfords	£2.42m	£2.56m	£0.02m	£2.54m	+5.0%	-0.6%	£3,471psm
<b>TOTAL</b>	£33.77m	£34.75m	£0.15m	£34.60m	+2.5%	-0.4%	
<b>Remainder of City Centre</b>							
Convenience	£15.73m	£15.96m	£0.16m	£15.79m	+0.4%	-1.0%	£7,832psm
Comparison							
Poundland	£1.68m	£1.75m	£1.75m	£0.00m	-100.0%	-100.0%	£0psm
Wilko	£5.63m	£5.94m	£0.07m	£5.88m	+4.5%	-1.1%	£2,613psm
Others	£107.72m	£113.82m	£0.65m	£113.17m	+5.1%	-0.6%	£9,721psm
All Comparison	£115.02m	£121.52m	£2.47m	£119.05m	+3.5%	-2.0%	£8,312psm
<b>TOTAL</b>	£130.75m	£137.47m	£2.63m	£134.84m	+3.1%	-1.9%	
<b>TOTAL CITY CENTRE</b>							
Convenience	£38.93m	£39.50m	£0.28m	£39.22m	+0.7%	-0.7%	£9,795psm
Comparison	£213.00m	£225.07m	£2.99m	£222.08m	+4.3%	-1.3%	£8,747psm
<b>TOTAL</b>	£251.94m	£264.57m	£3.27m	£261.30m	+3.7%	-1.2%	
<b>St Edmundsbury Retail Park</b>							
Convenience	£2.41m	£2.45m	£0.03m	£2.41m	+0.1%	-1.3%	
All Comparison	£32.20m	£33.92m	£0.33m	£33.59m	+4.3%	-1.0%	£2,960psm
	£34.61m	£36.36m	£0.36m	£36.01m	+4.0%	-1.0%	
<b>Bartons Retail Park</b>							
Convenience Farmfoods	£1.99m	£2.02m	£0.02m	£2.00m	+0.6%	-0.8%	£5,298psm
Comparison	£2.12m	£2.24m	£0.00m	£2.24m	+5.7%	+0.0%	£1,500psm
	£4.11m	£4.26m	£0.02m	£4.24m	+3.2%	-0.4%	
<b>Other Major Foodstores</b>							
Aldi	£27.64m	£28.25m	£0.05m	£28.20m	+2.0%	-0.2%	£24,416psm
Asda	£46.05m	£46.92m	£0.15m	£46.77m	+1.6%	-0.3%	£13,521psm
Co-op	£3.74m	£3.81m	£0.02m	£3.79m	+1.5%	-0.4%	£3,123psm
Sainsbury's	£45.11m	£45.97m	£0.37m	£45.59m	+1.1%	-0.8%	£13,645psm
Tesco	£44.29m	£45.13m	£0.23m	£44.90m	+1.4%	-0.5%	£12,129psm
	£166.84m	£170.08m	£0.81m	£169.27m	+1.5%	-0.5%	
<b>Other Major Non-Foodstores</b>							
Matalan	£3.88m	£4.10m	£0.02m	£4.09m	+5.2%	-0.4%	£1,787psm
The Range	£8.54m	£9.03m	£0.07m	£8.96m	+4.9%	-0.7%	£1,896psm
B&M	£7.07m	£7.38m	£0.06m	£7.33m	+3.7%	-0.8%	£3,471psm
Glasswells	£6.58m	£6.95m	£0.00m	£6.95m	+5.7%	+0.0%	£868psm
House of Harmony	£1.03m	£1.09m	£0.00m	£1.09m	+5.7%	+0.0%	£1,500psm
DJ Evans	£0.72m	£0.76m	£0.00m	£0.76m	+5.7%	+0.0%	£1,500psm
B&Q	£5.67m	£6.00m	£0.04m	£5.96m	+5.0%	-0.6%	£1,534psm
Miscellaneous Others	£37.20m	£39.30m	£0.24m	£39.06m	+5.0%	-0.6%	
Proposed Development			£4.88m	£5.27m			
Total	£70.69m	£74.61m	£4.46m	£79.46m	+12.4%	+6.5%	
<b>PRIMARY CATCHMENT AREA TOTAL</b>	£528.18m	£549.89m	£0.00m	£550.28m	+4.2%	+0.1%	

TABLE 2.8 - SENSITIVITY TEST RESULTS - SCENARIOS D TO F

Test	Bury St Edmunds City Centre % Change in Turnover		St Edmundsbury Retail Park % Change in Turnover		The Bartons Retail Park % Change in Turnover	
	2024 with Dvpt v 2022 without	2024 with Dvpt v 2022 without	2024 with Dvpt v 2022 without	2024 with Dvpt v 2024 without	2024 with Dvpt v 2022 without	2024 with Dvpt v 2024 without
<b>SCENARIO D - FREEZER FOOD RETAILER</b>						
1. Central Case	+4.4%	-0.6%	+5.1%	+0.0%	-4.3%	-7.7%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	+4.2%	-0.8%	+5.1%	+0.0%	-6.3%	-9.6%
2B. Reduce Turnover -25%	+4.5%	-0.5%	+5.2%	+0.0%	-2.3%	-5.8%
3. Assume 90% of turnover is drawn from PCA	+4.4%	-0.6%	+5.2%	+0.0%	-3.5%	-6.9%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	+4.6%	-0.4%	+5.1%	+0.0%	-5.0%	-8.3%
4A: Increase trade diversion from City Centre by 33%	+4.2%	-0.8%	+5.2%	+0.0%	-3.7%	-7.0%
<b>SCENARIO E - WILKO NON-FOOD DISCOUNTER</b>						
1. Central Case	+4.2%	-0.7%	+2.2%	-2.8%	+3.6%	+0.0%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	+4.0%	-0.9%	+1.5%	-3.4%	+3.6%	+0.0%
2B. Reduce Turnover -25%	+4.4%	-0.6%	+2.9%	-2.1%	+3.6%	+0.0%
3. Assume 90% of turnover is drawn from PCA	+4.3%	-0.7%	+2.5%	-2.5%	+3.6%	+0.0%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	+4.5%	-0.5%	+0.6%	-4.3%	+3.6%	+0.0%
4A: Increase trade diversion from City Centre by 33%	+4.0%	-1.0%	+3.8%	-1.2%	+0.7%	-2.8%
<b>SCENARIO F - POUNDLAND NON-FOOD DISCOUNTER</b>						
1. Central Case	+3.7%	-1.2%	+4.0%	-1.0%	+3.2%	-0.4%
2. Turnover of Dvpt						
2A. Increase Turnover +25%	+3.4%	-1.5%	+3.8%	-1.2%	+3.1%	-0.5%
2B. Reduce Turnover -25%	+4.0%	-0.9%	+4.3%	-0.7%	+3.3%	-0.3%
3. Assume 90% of turnover is drawn from PCA	+3.8%	-1.1%	+4.1%	-0.9%	+3.3%	-0.3%
4. Amend trade diversion assumptions:						
4A: Reduce trade diversion from City Centre by 33%	+3.4%	-1.6%	+5.0%	-0.1%	+3.4%	-0.2%
4A: Increase trade diversion from City Centre by 33%	+4.1%	-0.8%	+3.1%	-1.9%	+3.1%	-0.5%
<i>(max trade diversion from CC for comp goods = 100%)</i>						
Range	+3% to +5%	-0% to -2%	+0.6% to +5%	-4% to -0%	-6% to +4%	-0% to -10%

## Significance of Retail Impacts – Scenarios D to F

### Scenario D – Freezer Food Retailer

#### *Bury St Edmunds City Centre*

- 3.26 Impacts on the City Centre with this scenario are lower than identified for either Scenarios A or B. There will be a minimal direct impact on convenience goods shopping in the City Centre and turnover in 2024 would be less than 3% lower than in 2022. Sales densities for convenience goods shops in the City Centre will remain strong. The proposal will have no impact on comparison goods retailing in the City Centre. In overall terms this scenario will not affect the viability or vitality of the centre.

#### *St Edmundsbury Retail Park*

- 3.27 The proposed development will not have any impact on the Retail Park.

#### *Bartons Retail Park*

- 3.28 The proposed development will have an impact on the existing Farmfoods store located within the retail park. As a result direct impacts (2024 with development compared to 2024 without) on all goods will be in the range of -6% to -10% but overall levels of turnover will only be between -2% and -6% lower than at present. This is a very low level of change which will not affect the viability of the retail park as a whole.
- 3.29 Impacts will, however, be concentrated on the Farmfoods. This is identified to be trading approximately 15% below existing levels. However it is not considered that this will affect the viability of the store because the turnover of the store would remain close to £5300 psm. Existing sales densities, reflecting the analysis set out in SERS are currently above UK national average levels (currently at £5055 psm – see Table D) and so the post-impact sales density of the store would remain above this average level for the company.

#### *Conclusion*

- 3.30 In overall terms it is not considered that Scenario D would not affect the vitality or viability of the City Centre or either of the two retail parks. In addition, it should be noted that Bury St Edmunds only currently has two specialist frozen food retailers and this scenario would provide a third operator which will improve the offer in this subsector enhancing the choice for residents within the town.

### Scenario E – Wilko Non-Food Discounter

#### *Bury St Edmunds City Centre*

- 3.31 In overall terms this scenario would result in only a marginal direct impact in 2024 of -0.7% for all goods and -0.9% for comparison goods. Both all goods and comparison goods would be trading significantly higher in real terms in 2024 compared to the current position in 2022 even with the development of the proposed store.
- 3.32 The principal impacts will be on the existing Wilko which will lose approximately 25% of its existing turnover and Poundland (-5% direct impact in 2024 but turnover in 2024 would be almost the same as 2022 levels in real terms). As discussed in the introduction this scenario would only be plausible if Wilko are seeking to expand

their representation in the town and therefore the existing City Centre store would remain trading. Furthermore this is reflected in the residual sales density for the City Centre store which would remain close to £2000 psm which would only be marginally less than their current national average (see Table E). In conclusion, it is evident that, in this scenario, there would be no impact on the vitality or viability of the City Centre.

#### *St Edmundsbury Retail Park*

- 3.33 Reflecting both the similarity of retail offer and very close proximity, this scenario identifies significant trade diversion from the Home Bargains store on Easlea Road. This store, although adjacent to the retail park is actually located outside the retail park boundary. However, even reflecting these assumptions of trade diversion the direct impacts on comparison goods turnover in SERP (including adjoining areas) would only be -2.9% and turnover would be *higher* than at present (2022). The proposal will not, therefore, affect the viability of any retail units in the SERP area.

#### *Bartons Retail Park*

- 3.34 It is not considered that Scenario E will have any direct or cumulative impact on the Bartons Retail Park.

#### *Conclusion*

- 3.35 In overall terms it is not considered that Scenario E would not affect the vitality or viability of the City Centre or either of the two retail parks.

### **Scenario F – Poundland Non-Food Discounter**

#### *Bury St Edmunds City Centre*

- 3.36 This scenario assumes the closure of the City Centre Poundland. This scenario also assumes the diversion of some additional trade from other City Centre shops (for both convenience and comparison goods reflecting the mix found in Poundland stores). However, impacts on the City Centre, even with these assumptions will be very low. Direct impacts are identified to be -0.7% for convenience goods and -1.3% for comparison goods (-1.2% all goods – range in sensitivity tests -0.8% to -1.6%). For both convenience and comparison goods turnover in the City Centre would be higher than currently (2022) (+3% to +4% for all tests).
- 3.37 In addition the limited size of the Poundland store, which accounts for only 1.3% of the total occupied retail floorspace within the City Centre, would not result in a significant increase in vacancies. It is accepted that this store has a high profile location in Cornhill but it is expected that, should this scenario occur, the size of the unit and its location would result in the unit being rapidly re-let.
- 3.38 The proposed development would not, therefore, affect the vitality or viability of the City Centre.

#### *St Edmundsbury Retail Park*

- 3.39 As with Scenario E this scenario identifies significant levels of trade diversion from the Home Bargains store. However, because this scenario assumes a relocation from the City Centre, trade diversion and retail impacts are less than with Scenario E. As a result of this impacts are extremely low and this Scenario would not affect the viability of any retail units in the SERP locality.

### *Bartons Retail Park*

- 3.40 Impacts on Bartons Retail Park in this Scenario are associated with the limited convenience sales in the Poundland unit of which a small proportion is assumed to be diverted from Farmfoods. However, direct and cumulative impacts are extremely low and would not affect the viability of Farmfoods and, as a consequence of this, nor the vitality or viability of Bartons Retail Park.

### *Conclusions*

- 3.41 In overall terms it is not considered that Scenario F would not affect the vitality or viability of the City Centre or either of the two retail parks.

## **Summary**

- 3.42 This update has included testing three additional scenarios: Scenario D with a frozen food specialist retailer; Scenario E with Wilko as the named operator of the unit; and Scenario F with Poundland as the named operator. The assessment has used the updated expenditure and turnover data provided in Section 2 of this Report. The selection of these additional scenarios has been in response to the recommendation for these to be undertaken by LSH although, as noted, the operation of the planning system in England is not concerned with the identity of individual operators since planning consents are, in the vast majority of cases, not personal consents. Instead the focus of the retail assessment should reflect the characteristics of types of retail operation that would be determined by conditions limiting the gross and net floor area of the unit, size and configuration of unit(s) and restrictions concerning the permitted ranges of goods. As such there is no planning merit in restricting the assessment to named operators unless there is a strong expectation that a particular operator would be trading from the proposed store (as would be the case if the application is submitted by a named operator or there is an agreement in place with a named operator).
- 3.43 Notwithstanding these comments Scenarios E and F have been based on named operators. Scenario D considers the potential impacts arising from a subcategory of food retailer which was not requested by LSH. LSH also recommended consideration to be given to the operation of an M&S Foodhall in the unit. This has not been undertaken because M&S have confirmed that the unit would not be suitable for their operation and written confirmation of this is being sought and will be submitted as soon as this is available.
- 3.44 The assessment of these three additional scenarios has demonstrated that none would have an adverse impact on the vitality or viability of Bury St Edmunds City Centre nor of the St Edmundsbury or Bartons Retail Parks.

## 4 Summary and Conclusions

- 4.1 This update to the RIA addresses specific matters raised by LSH in their review of the original RIA submitted in support of the planning application for change of use from leisure to retail at the Sports Direct Gym, Easlea Road, Bury St Edmunds.
- 4.2 The update also takes the opportunity to use the most up-to-date information for expenditure growth, including the future growth of special forms of trading, provided through the Experian Retail Planner Briefing Note 19, published in February 2022. From this revised estimates of turnover and available expenditure have been provided that take into account, insofar as this is possible, the effects of the covid-19 pandemic on retailing trends.
- 4.3 In addition to this three further scenarios have been tested:
- Scenario D – Freezer Food Retailer
  - Scenario E – Wilko Non-Food Discounter
  - Scenario F – Poundland Non-Food Operator
- 4.4 It has been noted that testing the impacts of specific operators when none have been identified is not consistent with the basis of the grant of planning consents for retail use in England. Nonetheless, robust assessments of retail impact have been undertaken and it has been demonstrated that no scenario (i.e. of all six scenarios A to F) will result in a significant adverse impact that will undermine the vitality or viability of Bury St Edmunds City Centre nor the St Edmundsbury or Bartons Retail Parks,