

PROOF OF EVIDENCE OF CHRISTINE REEVES

BSC (HONS), DIP TP, MRTPI

**Section 78 Appeal by
Dudsbury Homes (Southern)
Ltd**

**Appeal Ref:
APP/D1265/W/23/3336518**

LPA Ref: P/OUT/2023/01166

MAY 2024

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DECLARATION

This evidence which I have prepared and provide for the Appeal reference **APP/D1265/W/23/3336518** in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

1. EXPERIENCE AND QUALIFICATIONS

- 1.1 My full name is Christine Margaret Reeves.
- 1.2 I am a specialist retail planning consultant with nearly 40 years experience in retail and town planning.
- 1.3 I started my career at Tesco Stores Ltd (Tesco), where I spent nearly 20 years. I was initially employed within the Site Research department and was responsible for the assessment of sites for new store developments. I then joined the New Stores team in the Property Department as the company's Planning Researcher. This role included responsibility for reviewing and commissioning research relating to food shopping behaviour and the effects of new store development.
- 1.4 Since leaving Tesco I have worked for several planning consultancies specialising in retail and town centre development. I have considerable experience of preparing and critiquing sequential and retail impact assessments and have prepared a number of retail studies for local planning authorities.
- 1.5 I am a member of the Royal Town Planning Institute and hold an Honours degree and Diploma in Town Planning from UWIST (now Cardiff University).
- 1.6 I first became involved in this project in January 2024 when LSH was approached by Dorset Council to provide retail advice and evidence in relation to this appeal.
- 1.7 I provided an initial view to the Council on the Retail and Impact and Sequential Assessments report prepared by DPDS and provided by the Appellant as part of the Appeal submission. This advised that the assessments could not be relied upon to demonstrate compliance with the sequential and impact policy tests. I then prepared a formal appraisal of the report which was provided to the Appellant. A copy of this advice is provided in Appendix 1 to this Proof [Appendix CR/1].

2. SCOPE OF EVIDENCE

- 2.1 I am instructed to appear at this Planning Inquiry by Dorset Council to provide evidence in relation to two of the reasons for the refusal of Application Ref: P/OUT/2023/01166.

REASONS FOR REFUSAL

- 2.2 The inquiry is considering an appeal by Dudsbury Homes (Southern) Ltd relating to land south of Ringwood Road, Alderholt. An outline planning application for the development of the site for a mixed use development was refused planning permission on 7 July 2023. The application described the development as:

Mixed use development of up to 1,700 dwellings including affordable housing and care provision; 10,000sqm of employment space in the form of a business park; village centre with associated retail, commercial, community and health facilities; open space including the provision of suitable alternative natural green space (SANG); biodiversity enhancements; solar array, and new roads, access arrangements and associated infrastructure (Outline Application with all matters reserved apart from access off Hillbury Road).

- 2.3 The reasons for refusal (RfR) relevant to my Proof are:

- Reason for Refusal 3 - *The submitted masterplan does not demonstrate how the proposed uses will function well in terms of their relationship to each other and to the existing settlement of Alderholt. In particular, the positioning of the local centre is not considered to be optimised to accommodate and sustain an appropriate mix of development. Contrary to paragraph 130 of the NPPF, and*
- Reason for Refusal 5 - *The proposal includes uses defined in Annex 2 of the NPPF as 'main town centre uses' expected to total 2,958sqm and include 1,259sqm of retail. The application is not accompanied by a sequential test or retail impact assessment, contrary to Policy KS7 of the Christchurch and East Dorset Local Plan: Part 1, 2014, and to paragraphs 87 and 90 of the NPPF.*

Reason for Refusal No. 3 – Location of Local Centre

- 2.4 The main evidence in relation to this RfR is provided by Ms Fay in her Proof of Evidence. However, I also consider the location of the proposed centre is relevant in the context of my findings regarding the potential impact on the existing Alderholt Co-op. I provide my thoughts on this in Section 8 of this report.

Reason for Refusal 5 – Sequential and Impact Assessments

- 2.5 It ought to be a matter of agreement between the parties that the original RfR was valid and that both a sequential and impact assessment should have been submitted as part of the original application. Refusal on the grounds of the absence of such information is in accordance with national planning policy guidance [PPG, Town Centres and Retail, Paras 011 & 017].
- 2.6 Since the application was determined and as part of the appeal submission, the Appellant provided a Retail Impact and Sequential Test Assessments report (the RITSA), prepared by DPDS. This seeks to address RfR 5 and has to the extent that a report has now been submitted.
- 2.7 LSH has reviewed the document on the instruction of Dorset Council, to consider whether the additional material satisfactorily addresses the sequential and impact policy tests. A copy of the Appraisal is provided in Appendix CR/1 of this Proof.
- 2.8 The key findings are that:

- To be able to determine that the proposed local centre is in accordance with retail and town centre planning policy, it is necessary to understand the type and scale of the retail and town centre uses proposed [CR/1, para 2.1];
 - There is an inconsistency between what has been tested in the RITSA, previous application submissions and the proposed condition to control the nature of the local centre development [CR/1, paras 2.2 – 2.6];
 - The RITSA fails to demonstrate that the proposed local centre is of a scale and function appropriate for a local centre [CR/1, paras 2.10 – 2.13];
 - The relevance of Local Plan Policies PC5 and LN7 is not agreed [CR/1, paras 3.1 – 3.5];
 - The impact of the proposed local centre, raises policy concerns in relation to Local Plan Policy KS11, as well as the policies relating directly to the sequential test and retail impact [CR/1, para 3.6];
 - Provided the development is restricted to a form and scale that means it functions as a local centre, the proposed development satisfies the sequential test as it would not be appropriate to provide the development in any location other than Alderholt and there is no defined centre within the village [CR/1, paras 4.1 – 4.3];
 - There are a number of deficiencies in the retail impact assessment prepared by DPDS which mean it cannot be relied upon to determine the likely impact of the development [CR/1, paras 5.1 – 5.8]. Notwithstanding this the main concern regarding impact relates to the effect of the proposal on the Alderholt Co-op and the policy considerations this raises [CR/1, para 5.9]; and
 - There are also impact concerns regarding the cumulative impact of the main town centre uses proposed [CR/1, para 5.10].
- 2.9 To address these remaining concerns the report concludes that it is necessary to agree the form and content of the proposed local centre [CR/1, para 6.6], with planning conditions then required to ensure the development provided does not change significantly from that tested [CR/1, para 6.7].

STRUCTURE OF PROOF

- 2.10 At the time of preparing this Proof of Evidence there has been no further agreement of Matters of Common Ground since March 2024 [SoCG], nor has the Appellant provided any feedback on the proposed wording for a condition to control the form and scale of development within the local centre. My Evidence is therefore structured as follows:
- Section 3 provides a summary of the retail and town centre policies and material considerations I consider relevant;
 - Section 4 considers the development proposal and specifically the retail and town centre uses proposed. It also sets out the aspects of the development I consider would need to be the subject of planning conditions if the appeal is allowed;
 - Section 5 assesses the appeal proposal against the sequential test requirements set out in Local Plan Policy KS7;
 - Section 6 assesses the appeal proposal against the impact test requirements set out in Local Plan Policy KS7;
 - Section 7 assesses the appeal proposal against Local Plan Policy PC5;
 - Section 8 assesses the appeal proposal against Local plan Policy KS11; and
 - Section 9 provides a summary of my evidence and my conclusions.

KEY DOCUMENTS

2.11 In preparing this Proof I make reference to a number of documents submitted by the Applicant/Appellant and other parties which have particularly informed my view on the retail and town centre planning issues raised by the development proposal.

2.12 For ease of reference these documents are as follows:

| Document | Author | Date | Reference (Core Docs refs to replace) |
|---|------------------------------|----------------|---|
| Appraisal of Retail Impact and Sequential Tests Assessment | Lambert Smith Hampton | April 2024 | Appended to this Proof at Appendix CR/1 (subsequently referred to as CR/1) |
| Retail Planner Briefing Note 21 | Experian | February 2024 | ERPBN21 (Extracts appended to this Proof at Appendix CR/2) |
| Bournemouth, Christchurch and East Dorset Joint Retail and Leisure Study, Volume 2 - Christchurch and East Dorset | NLP | 2017 | Extracts appended to this Proof at Appendix CR/3 (subsequently referred to as CR/3) |
| National Planning Policy Framework | DLUHC | December 2023 | NPPF |
| Planning Practice Guidance (Town Centres and retail) | DLUHC | September 2020 | PPG |
| Retail Impact and Sequential Test Assessments | DPDS | November 2023 | RITSA (Core Document CDA.77) |
| Statement of Common Ground | Dorset Council and Appellant | March 2024 | SoCG (Core Document CDC.1) |
| Case Management Conference Summary | J Bore (Inspector) | 3 May 2024 | CMC (Core Document CDC.6) |
| Rental & Yield Opinion | Goadsby | 15/04/2024 | GRYO |
| Local Centre Accommodation Schedule | Not known | 15/04/2024 | LCAS |
| Marketing Report | Vail Williams | 17/04/2024 | VWMR |
| Commercial Property Development Viability Report | Howell Commercial | 11/04/2024 | CPDVR |

2.14 For the avoidance of doubt, my evidence does not assess the potential inclusion of any Class E uses within the proposed 10,000 sqm of employment land that also fall within the NPPF definition of 'main town centre uses' [NPPF, Annex 2]. It is assumed that this would be the subject of a condition [SoCG, para 8.16]. However, we note that subsequent submissions by the Appellant suggest some office uses would be included within this space [VWMR, paras 1.2 & 6.1 and CPDVR, Sections 5.1 & 5.2]. If so, then this element of the employment space would require its own sequential and impact assessment.

3. PLANNING POLICY

- 3.1 The development plan and policies within it relevant to the determination of the current appeal are set out in the SoCG [SoCG, Section 4] and I believe both parties consider that the following are relevant in terms of the retail and main town centre uses proposed in the local centre:
- Policy KS2 - Settlement Hierarchy;
 - Policy KS6 - Town Centre Hierarchy;
 - Policy KS7 - Role of Town and District Centres; and
 - Policy PC5 - Shops and Community Facilities in Local Centres and Villages.
- 3.2 The NPPF is a material consideration, particularly paragraphs 90 – 95 and Annex 2, as is the Planning Practice Guidance for Town Centres and Retail (PPG).
- 3.3 I consider these policies and guidance to be relevant for the following reasons.
- 3.4 Policy KS2 sets out the settlement hierarchy for the area and includes Alderholt as one of five Rural Service Centres (RSC) along with Cranbourne, Sixpenny Handley, Sturminster Marshall and Three Legged Cross. RSC's are Tier 4 settlements, whilst Verwood is identified as a Tier 1 settlement.
- 3.5 This settlement hierarchy does not include Fordingbridge, the closest larger settlement to Alderholt, as it is within the New Forest District Council area. The local plan for this area (the Local Plan 2016-2036 Part One: Planning Strategy) identifies Fordingbridge as a Tier 1 Town Centre, under Policy STR4: The settlement hierarchy.
- 3.6 Policy KS6 sets out the town centre hierarchy, with Verwood again identified as Tier 1, a Town Centre. District and Local Centres are also defined and all other cluster of shops are defined as 'parades'. This is important because the NPPF excludes small parades of shops from the definition of a town centre [NPPF, Annex 2]. On this basis the sequential and impact tests relating to main town centre uses are relevant only for town, district and local centres as defined in the Local Plan.
- 3.7 Fordingbridge is considered to be a town centre within New Forest District, with Policy Econ5 - Retail development and other main town centre uses explicitly linking the retail hierarchy to the settlement hierarchy.
- 3.8 Policy KS7 includes the policy requirements for main town centre uses to demonstrate compliance with the sequential test and to provide an impact assessment for developments over 500 sqm in the Alderholt area. This requirement is consistent with the NPPF, as is statement that an application that fails the sequential test or is likely to have a significantly adverse impact on one or more of the factors set out in the policy, will be refused.
- 3.9 Policy PC5 has two elements to it, the first of which supports in principle improvements to the provision of shops which provide for people's day to day needs, leisure uses and facilities for local communities. The second part seeks to resist the loss of existing retail, leisure and other local facilities unless certain circumstances are clearly demonstrated, namely:
- There is insufficient demand; and
 - It is not feasible and viable to support their continued existence; and
 - The loss would not result in a substantial decline in the range and quality of services for local people.
- 3.10 It is apparent that for the proposed development to be acceptable:

- The Appellant needs to demonstrate compliance with the sequential test (Policy KS7);
 - The Appellant needs to demonstrate that the proposed development will not have a significantly adverse impact on town centre investment or vitality and viability (Policy KS7); and
 - The Appellant needs to demonstrate compliance with Policy PC5 in terms of the likely impact on the existing Co-op in Alderholt.
- 3.11 Two other development plan policies are considered relevant to the decision-making process by myself or the Appellant:
- Policy LN7 – Community Facilities and Service; and
 - Policy KS11 – Transport and Development.
- 3.12 The Appellant (in terms of what is expressed in the RITSA) considers Policy LN7 relevant and suggests that the village centre proposal is in accordance with the policy [RITSA, paras 3.16, 3.17, 3.20 & 6.5].
- 3.13 Whilst I agree that the provision of community facilities and services is important, I do not agree that the policy is directly relevant to the main town centre uses proposed. My reading of the policy is that it relates to community facilities and services other than shopping and leisure needs which are covered by Policy PC5, with the policy wording of LN7 specifically referencing “*education, health, libraries, facilities for older people / children and young people and community buildings*”.
- 3.14 The policy is therefore relevant to the medical floorspace being proposed in the local centre and possibly to the community uses depending on what may be provided (see below). However, these are not main town centre uses and as such the policy is not relevant to the current assessment of such uses [CR/1, para 3.5].
- 3.15 The final policy which I consider to be of relevance is Policy KS11, which indicates that the Council “*will use their planning powers to influence development so that it reduces the need to travel, provides improved access to key services and facilities and promotes alternative modes of travel*”.
- 3.16 This is not referred to in the original reasons for refusal in relation to the local centre, as no impact assessment had been provided at that stage. The review of the RITSA however confirms that there is a risk that the proposal could lead to the closure of the existing Co-op store as a result of the impact that it could experience.
- 3.17 I consider that the closure of the store would have implications for residents’ access to convenience retail provision and that Policy KS11 is relevant in this context.
- 3.18 I provide my views on whether the local centre element of the appeal proposal is in accordance with these policies below. However, first I consider the form of development being proposed and my assumptions regarding the subsequent policy assessment.

4. THE DEVELOPMENT PROPOSAL

- 4.1 In order to assess whether the proposed development complies with the relevant policy tests, it is first necessary to understand the nature of the proposed development as this will determine the suitability of other locations when considering the sequential test and in predicting trade draw and assessing impacts.
- 4.2 In this case the proposal is described as a village centre [RITSA, paras 2.1 & 3.20], intended to serve the local needs of the residents [RITSA, paras 3.20, 4.5, 5.54 & 6.1]. However, whilst a high level breakdown of the commercial space was provided at application stage [SoCG, para 8.21 and CR/1, para 2.2], little further information was provided as part of the outline application.
- 4.3 The RITSA provides some further information on the likely form of the development [RITSA, paras 2.1 – 2.3 & 2.5] but what is tested in the retail impact assessment is not consistent with what was originally proposed as part of the application, or with the planning condition suggested to restrict the form of development in the future [RITSA, para 2.4 and CR/1, paras 2.5 – 2.7].
- 4.4 There is also no consistency with more recently received information relating to the viability of the local centre [GRYO and LCAS].
- 4.5 More significantly, there is no agreement between the parties as to what would or would not be an appropriate form of development for the location, and I do not accept that the approach put forward by DPDS to support the scale and function of the centre [RITSA, pages 6-7] is appropriate [CR/1, paras 2.10 – 2.13].
- 4.6 There is also no agreement at the time I prepared this Proof that the Appellant is prepared to accept a number of planning conditions that could ensure the development proceeds in accordance with the sequential and impact assessments provided.
- 4.7 To illustrate these points I first consider the possible development options for the local centre as suggested by the Appellant. I then set out my concerns regarding the approach adopted by DPDS in assessing the scale and function of the development (RITSA, paras 3.18 – 3.20) and provide comparative information on how the proposed development relates to provision in other centres locally. I conclude the section by setting out the form of development that I consider could be appropriate for the location and the controls that would need to be included in a planning condition, to ensure that the form of development is appropriate and in line with what has been assessed by the Appellant.
- 4.8 In doing so, I am aware of the guidance provided in the PPG that it is for the applicant to demonstrate compliance with the sequential and impact tests and failure to undertake the necessary assessments could in itself constitute a reason for refusing planning permission [PPG, Town Centres and Retail, Paras 011 & 017].

PROPOSED LOCAL CENTRE DEVELOPMENT

- 4.9 The original application submission provided very little information on the Class E Uses proposed within the local centre, only specifying:
- 1,258 sqm retail (Class E(a));
 - 673 sqm food and beverage (F&B) (Class E(b));
 - 316 sqm community/sports (Class E(d));
 - 724 sqm medical (Class E(e)); and
 - 1,026 sqm offices (Class E(g)(i)) [SoCG, para 8.21]

- 4.10 The RITSA sought to provide further information [RITSA, paras 2.3] but then made different assumptions for the quantitative impact assessment [RITSA, Table 11]. Neither form of development conforms with the suggested condition [RITSA, para 2.4] or with more recent information in the GRYO or CPDVR. A summary of the various options put forward by the Appellant for the retail and main town centre uses is provided in Appendix CR/4.
- 4.11 Based on this, and the case tested in the RITSA, I believe that the proposed main town centre content of the local centre would be:
- A convenience food store of between 334 and 400 sqm gross (280 sqm net);
 - No other convenience provision;
 - Up to 429 sqm gross of comparison floorspace in 3-4 units, with one unit expected to be occupied by a pharmacy;
 - Up to 429 sqm gross of retail service floorspace in 3-4 units; and
 - Up to 673 sqm gross of food & beverage uses in the form of a single unit. The scheme could not currently include either a public house or hot food takeaway [RITSA, paras 2.4-2.5] as planning permission is not being sought for either Sui Generis use.
- 4.12 In terms of non 'main town centre uses' these would comprise:
- 316 sqm of community/sports uses. It is not considered this would be a main town centre as the floorspace is not included within the 2,958 sqm specified [RITSA, para 2.3]. As such the development cannot include commercial indoor sport, recreation or fitness uses [NPPF, Annex 2]. As a result I consider this floorspace should more appropriately be considered a Class F.2 use; and
 - 724 sqm of medical use floorspace which is expected to include a doctor's surgery and a dentist.

SCALE AND FUNCTION – REVIEW OF APPELLANT'S CASE

- 4.13 The approach adopted by DPDS to justify the scale of floorspace proposed within the local centre is to reference the available expenditure in the area [RITSA, paras 3.18 – 3.20]. The expected uplift in expenditure from the occupation of the new housing is then identified and compared with the expected turnover of the proposed retail units [RITSA, pages 6 & 7].
- 4.14 I have reviewed these figures and have concerns regarding a number of the inputs/assumptions made. More fundamentally however the approach adopted does not consider the existing provision in Alderholt [CR/1, para 2.12], nor does it consider how the expenditure patterns in the area will be influenced by the nature of the provision in the local centre.

Convenience Provision

- 4.15 In terms of convenience provision and using the agreed 2032 design year, DPDS suggests that the study area will generate £8.96m of convenience expenditure in 2032 without the development [RITSA, Table 3] which would increase by £5.71m if the proposed housing were to proceed [RITSA, Table 4], giving a total spend in the area of £14.67m.
- 4.16 The turnover of the Co-op in Alderholt in 2032 is assumed to be £2.34m [RITSA, Tables 9 & 13c] without development. With the new housing and the trade draw to the proposed store this would decrease to £1.77m [RITSA, Table 13c].
- 4.17 In contrast DPDS suggest that the proposed store would have a turnover of £3.17m [RITSA, Table 11], despite a similar offer, which is considerably above the £2.0m DPDS suggests would be typical for this size of convenience store [RITSA, para 2.3].

- 4.18 This would mean that the total retained convenience expenditure (ie the money generated by the local population that is spent in Alderholt) would be £4.94m of the total £14.67m or around 34%. This compares with around 26% retention by the Co-op without the development (£2.34m of the £8.96m available).
- 4.19 The forecast level of retention is, in my opinion, relatively high, given that neither store would be expected to attract main food shopping trips. Such trips are usually accepted as attracting between 70% and 80% of available spend, although I note that DPDS suggests a figure of just 65% in the impact assessment [RITSA, para 5.30].
- 4.20 I consider that a lower retention level would be more likely in this situation, consistent with the performance of the Co-op currently and given the lack of evidence to support the higher turnover of the proposed store. A retention rate of 30% would mean the two stores would have a combined turnover of £4.40m which seems reasonable and at this level the scale of convenience floorspace proposed in the local centre is appropriate.
- 4.21 However significantly, the local centre is not intended to meet the main food shopping needs of the existing or new population and significant trade leakage can therefore be expected. This will result in regular (likely weekly) food shopping trips being undertaken to Fordingbridge, Verwood and/or Ringwood by both existing and new residents [RITSA, para 5.30].

Comparison Provision

- 4.22 In terms of comparison spend, the available expenditure in the area is estimated by DPDS at £15.70m in 2032 without development [RITSA, Table 3], increasing by £10.02m with the new development [RITSA, Table 4] to £25.72m.
- 4.23 However, I consider that very little of this will be available to support comparison floorspace in the village, given the types of retailers that are likely to be attracted to a local centre location. The types of goods included within comparison sales are set out in the RITSA [RITSA, para 5.33], but there is no explanation as to how DPDS have reached their conclusion that smaller items comprise around half of comparison goods expenditure [RITSA, para 5.33], nor do they detail what types of goods they anticipate will be sold in the local centre. This is critical for understanding trade draw and impacts, but also in determining what may be a suitable scale of comparison development in the proposed centre.
- 4.24 To look at this in more detail I have used information from the most recent Experian Retail Planner Briefing Note 21 [Appendix CR/2] to look at how comparison spend is split between different types of goods and then considered which of these are likely to be sold in a lower order centre.
- 4.25 Comparison provision in a village centre is most likely to relate to the purchase of small items such as health and beauty, non-durable household goods and possibly cards and gifts. It would not be expected to include the types of goods where expenditure is highest, such as clothing and footwear.
- 4.26 Even before allowance is made for online sales and other Special Forms of Trading (SFT), it is therefore clear that the spend available to support comparison shops in Alderholt will be limited, given spend on non-durable household goods, medical and pharmaceutical goods and spend on other personal effects is limited to less than 5% of total comparison spend.

| Category | UK Spend per Head (£) | % Comparison Spend | Available Spend in Alderholt 2032 without development | Available Spend in Alderholt 2032 with development |
|---|-----------------------|--------------------|---|--|
| Available Comparison Spend (£m) | | | £15.70 | £25.72 |
| Clothing materials & garments | 782 | 20.9% | £3.29 | £5.39 |
| Shoes & other footwear | 142 | 3.8% | £0.60 | £0.98 |
| Materials for maintenance & repair of dwellings | 18 | 0.5% | £0.08 | £0.12 |
| Furniture & furnishings / Carpets & other floor coverings | 457 | 12.2% | £1.92 | £3.15 |
| Household textiles | 107 | 2.9% | £0.45 | £0.74 |
| Major household appliances | 142 | 3.8% | £0.60 | £0.98 |
| Small electric household appliances | 20 | 0.5% | £0.08 | £0.14 |
| Tools & misc accessories | 110 | 2.9% | £0.46 | £0.76 |
| Glassware, tableware and household utensils | 109 | 2.9% | £0.46 | £0.75 |
| Non-durable household goods | 10 | 0.3% | £0.04 | £0.07 |
| Medical goods & other pharmaceutical products | 127 | 3.4% | £0.53 | £0.87 |
| Therapeutic appliances & equipment | 50 | 1.3% | £0.21 | £0.34 |
| Bicycles | 27 | 0.7% | £0.11 | £0.19 |
| Recording media | 84 | 2.2% | £0.35 | £0.58 |
| Games, toys, sports & camping & musical instruments | 346 | 9.3% | £1.45 | £2.38 |
| Gardens, plants & flowers | 96 | 2.6% | £0.40 | £0.66 |
| Pets & related products | 145 | 3.9% | £0.61 | £1.00 |
| Books & stationary | 172 | 4.6% | £0.72 | £1.18 |
| Audio-visual, photographic & information processing equipment | 245 | 6.6% | £1.03 | £1.69 |
| Appliances for personal care | 363 | 9.7% | £1.53 | £2.50 |
| Jewellery, clocks & watches | 148 | 4.0% | £0.62 | £1.02 |
| Other personal effects | 34 | 0.9% | £0.14 | £0.23 |
| Total Comparison | 3734 | 100.0% | £15.70 | £25.72 |

4.27 This means that the approach adopted by DPDS to justify the amount of comparison floorspace proposed [RITSA, pages 6 & 7 is not appropriate.

Other Local Centre Uses

4.28 Similarly, the case made for the food and beverage provision is not appropriate [RITSA, pages 6 & 7] and contrary to what DPDS suggests, local estimates of spend on different types of food & beverage outlets is available should it be required, for instance from Experian [RITSA, paras 5.22 – 5.23].

4.29 However, the Appellant is now suggesting that the floorspace proposed would be in a single restaurant unit of up to 673 sqm. This seems very large for a unit that could not be a public house (Sui Generis use) in this location.

SCALE AND FUNCTION – COMPARATIVE PROVISION

4.30 Based on the above, I do not consider that the size and mix of uses proposed for the local centre has been justified by the Appellant and therefore I have considered another approach to determine what may be appropriate in terms of local centre provision. This is to consider how the proposed offer compares with similar centres elsewhere.

4.31 In this case this means considering what is provided in the other Rural Service Centres in the area [CR/1, para 2.13], which, in terms of main town centre uses, we understand is as follows:

- Cranbourne – Convenience store & Post Office, book shop, public house x2;
- Sixpenny Handley – Convenience store, butchers, public house;

- Sturminster Marshall – Convenience store, convenience store & pharmacy;
 - Three Legged Cross – Convenience store & Post Office, convenience store, plus garden centre (with concessions) on the edge of the centre.
- 4.32 I accept that, given the size of Alderholt if the appeal were to be allowed, then it would be appropriate to provide a wider range of town centre uses in the village. Given the differences in levels in the retail hierarchy however, provision in Alderholt should not be of a scale to compete with that provided in either Verwood or Fordingbridge town centres.
- 4.33 DPDS provides limited information on either of these centres [RITSA, paras 5.7 – 5.16] but further information on Verwood is provided in Volume 2 of the Bournemouth, Christchurch and East Dorset Joint Retail and Leisure Study 2017 by NLP [Appendix CR/3].
- 4.34 This indicates that Verwood at that time of the 2017 study had a total of 42 retail/service units, with an emphasis on service uses and a limited comparison offer reflecting its role as a service centre rather than a higher order comparison shopping destination [CR/3, para 3.67]. DPDS notes that the retail offer includes 3 small convenience stores and a limited range of comparison shops. The service offer includes a post office, banks, estate agents, hairdressers, travel agent, accountants and a dry cleaners [RITSA, para 5.7].
- 4.35 Fordingbridge is reported as having 9 convenience stores including a Co-op and Tesco Express and 24 comparison shops. It also has 6 pubs/restaurants and two takeaways and a number of retail service outlets [RITSA, para 5.12]. This strong food and beverage and comparison offer will at least in part reflect the tourist draw of the town and as such would not be typical of what would be expected in Alderholt.

PROPOSED CONDITIONS

- 4.36 Based on the above I consider that a local centre in Alderholt is likely to be able to support an additional convenience foodstore as detailed above, along with a small number of other retail uses. This is likely to include a pharmacy (comparison) as proposed by the Appellant, although other comparison uses are likely to be limited.
- 4.37 Retail services uses such as a hairdressers/beauty salon, barbers and potentially an estate agent and opticians could also be expected in a local centre. However, overall I consider the demand for space is likely to be limited, with most interest coming from independent businesses.
- 4.38 This would be appropriate for a village centre, but my concern would be if larger units were provided that might attract national multiples or specialist providers requiring a larger catchment area to support them. Such uses would be expected to draw trade from outside of Alderholt. This applies both to retail and the other main town centre uses.
- 4.39 As a result I consider it will be important to ensure that both the individual unit sizes and the overall floorspace remain of a scale that will only serve Alderholt.
- 4.40 It is also important that whatever the mix and quantum of floorspace provided, it should be consistent with what has been tested in the sequential and retail impact assessments. In this case I consider this means that should this appeal be allowed, it should include the following restrictions on main town centre uses with the local centre:
- 1) It should include a single retail unit of no more than 400 sqm gross (280 sqm net sales area, defined as all areas that the public have access to), for the sale of convenience goods (Class E(a));

- 2) It should include a minimum of 7 retail units (Class E(a)) for the sale of comparison goods or occupation by retail service businesses, totalling no more than 858 sqm gross (600 sqm net sales area), with no unit to have a gross floorspace more than 400sqm;
- 3) It should include no more than 673 sqm gross of floorspace to be used for the sale of food and drink for consumption on the premises (Class E(b)); and
- 4) No more than 1,026 sqm of office floorspace (Class E(g)), with no unit greater than 350sqm.

4.41 My comments in the rest of this Proof assume conditions to restrict the uses to the above would apply.

5. ASSESSMENT AGAINST POLICY KS7 – THE SEQUENTIAL TEST

- 5.1 As set out in the LSH Appraisal of the RITSA [CR/1, paras 4.1 – 4.3], it has been agreed that, provided the development is consistent with a local centre offer, then there are locational requirements that mean the local centre element of the appeal proposal could not be located anywhere other than Alderholt.
- 5.2 Further, given there is no defined centre for Alderholt we do not consider that there is a 'sequential test' requirement to consider other sites in the village.
- 5.3 This was explained at the CMC [CMC, para 10(iii)].

6. ASSESSMENT AGAINST POLICY KS7 – RETAIL IMPACT

- 6.1 As set out above, the impact of the proposed local centre development needs to be considered in relation to its potential impact on town centres in the area (Policy KS7 and the NPPF) and on existing provision in Alderholt (Policy PC5).
- 6.2 Whilst the LSH appraisal of the impact assessment in the RITSA raises a number of concerns regarding the assessment provided [CR/1, paras 5.7 – 5.10], I agree that any impacts on the defined centres in the area would not be significantly adverse provided the scale of development is limited to that appropriate for a local centre.
- 6.3 This was explained at the CMC [CMC, para 10(iii)].
- 6.4 I also agree that the increase in population in Alderholt could have positive benefits for both Fordingbridge and Verwood town centres, because of the higher available spend.
- 6.5 However, I disagree with the analysis provided by DPDS [RITSA, paras 5.49 – 5.52] and conclude that any uplift in town centre turnover is likely to be small:
- Most convenience spend is likely to relate to main food shopping trips and this is most likely to go to out of centre locations;
 - Any comparison provision in Alderholt would be expected to provide an offer that is the same or similar to that already provided in the two town centres. Therefore while some businesses may benefit from increased spend from the higher levels of population, others will lose spend from existing Alderholt residents to the new local centre;
 - This will also apply to retail services such as hairdressers, with existing businesses likely to lose trade if such uses are introduced into the local centre; and
 - Food and beverage trade draw is likely to be dispersed, with exact impacts dependent on what is provided in the local centre. However again any uplift in trade from new residents will have to be considered against the loss of business from existing Alderholt residents who decide instead to use the new facility in Alderholt.

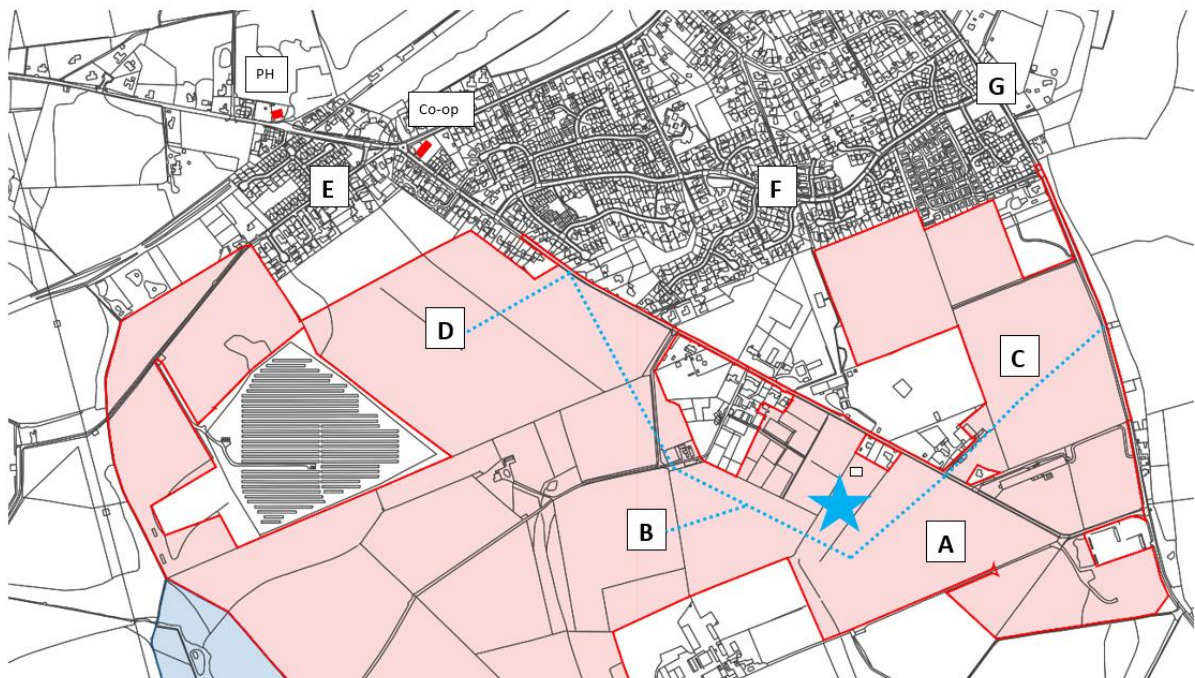
7. ASSESSMENT AGAINST POLICY PC5 – SHOPS AND COMMUNITY FACILITIES

- 7.1 The existing Co-op in Alderholt is not within a defined centre in terms of the NPPF definition of a town centre and as such consideration of the impact of the appeal proposal on the shop, is not a consideration under Policy KS7 or the retail impact policies set out in the NPPF.
- 7.2 However, it is apparent from the RITSA that the proposed local centre development will have a negative impact on the Co-op, with DPDS forecasting a decline of trade from £2.34m in 2032 with no housing development [RITSA, Table 10] to £1.77m with the local centre [RITSA, Table 13c]. This represents a loss of trade of £0.57m per annum or 24%, despite the local increase in population.
- 7.3 This is a significant level of impact and I do not agree with DPDS that it can be assumed that the Co-op is unlikely to close [RITSA, para 5.63]. Retailers are constantly reviewing their store portfolios and, depending on the existing profitability of the store and/or the potential requirement for investment in the building, a loss of nearly a quarter of the store's trade could provide a reason for closure, notwithstanding there may be longer term potential for growth.
- 7.4 It is also possible that the development of the local centre, could lead the Co-op to seek to relocate to the new convenience unit. This is not an option considered in the RITSA.
- 7.5 I consider that the risk of the Co-op closing is a real one, and if this were to happen it would be contrary to Policy PC5. DPDS agrees that the closure of the Co-op needs to be assessed against this policy [RITSA, paras 3.16, 3.17] and that there is a risk the store could close [RITSA, para 5.53]. However, they consider the proposal is in accordance with the policy [RITSA, paras 3.16 & 6.5] as they argue that the shop would be replaced [RITSA, paras 5.3, 5.54 & 6.4].
- 7.6 The Policy, which has two elements to it, does not explicitly consider the situation where a facility is replaced [CR/1, para 3.4]. The first part provides in principle support for improvements to the provision of shops which provide for people's day to day needs, leisure uses and facilities for local communities. The second part seeks to resist the loss of existing retail, leisure and other local facilities unless certain circumstances are clearly demonstrated, namely:
- There is insufficient demand; and
 - It is not feasible and viable to support their continued existence; and
 - The loss would not result in a substantial decline in the range and quality of services for local people.
- 7.7 The closure of the Co-op would not be because of insufficient demand and its continued existence is only threatened by the appeal proposal not by any more general viability concerns. As such I consider that this would be contrary to Policy PC5.
- 7.8 Replacement provision may offset this negative impact, but, at the same time would not improve the convenience facilities available. In such a situation my view is that the proposal should be considered neutral in terms of this policy, with the benefits of new provision outweighed by the closure of the existing facilities.
- 7.9 However, this leads me to question whether this can then be considered to be sustainable development. The new convenience store would result in development on a greenfield site and require a totally new construction, whilst an existing building, capable of providing the same offer would be vacated.

-
- 7.10 Although not assessed by DPDS, I consider that there is a similar risk that the only comparison shop currently in the village (Nearly New Beginnings) would close, either through relocation to the new centre, potential impacts from a new operator in the local centre or the decline in footfall at the adjoining Co-op.
- 7.11 Similarly, were a public house to be included within the local centre development – which for the avoidance of doubt would not be permitted under the current appeal submission – the same risks of closure would apply.
- 7.12 On this basis I conclude that, if the development of the new local centre were to lead to the closure or relocation of the Co-op, the other comparison shop in the village and/or the existing public house, then the appeal proposal would be neutral in terms of its compliance with Policy PC5, but contrary to the general principle of sustainable development [NPPF, para 7].

8. ASSESSMENT AGAINST POLICY KS11 - ACCESSIBILITY

- 8.1 The final policy which I consider to be of relevance is Policy KS11, which indicates that the Council “will use their planning powers to influence development so that it reduces the need to travel, provides improved access to key services and facilities and promotes alternative modes of travel”.
- 8.2 This is not referred to in the original reasons for refusal in relation to the local centre, as no impact assessment had been provided at that stage. The review of the RITSA however confirms that there is a risk that the proposal could lead to the closure of the existing Co-op store as a result of the impact that it could experience.
- 8.3 The closure of the store would have implications for residents’ access to convenience retail provision and Policy KS11 is relevant in this context. It is also relevant to RfR 3 in relation to the location of the local centre.
- 8.4 As discussed in relation to impacts, there are two potential trading scenarios to consider if the appeal proposal proceeds and a local centre is developed. This first, which DPDS assumes will be the case, is that the existing businesses and particularly the Co-op, continue to trade as they do now.
- 8.5 In such a situation I would expect the existing residents of Alderholt and those living in the new residential areas currently being built out near the public house, to be more likely to continue to use the Co-op for top-up food shopping as this would be the more convenient location for them. Residents in the appeal housing would generally be more likely to use the convenience store in the local centre, as this would be closer to them.
- 8.6 To illustrate this I have undertaken my own assessment of the distances involved from a small number of locations within the existing village and proposed development area:



Source: Base Map from Application submission, with LSH annotations

| Location | Distance to Co-op | Distance to Local Centre |
|----------|-------------------|--------------------------|
| A | 1.3kms | 240m |
| B | 1.2kms | 500m |
| C | 1.4kms | 650m |
| D | 630m | 1.2kms |
| E | 170m | 1.4kms |
| F | 760m | 1.6kms |
| G | 1.3kms | 1.3kms |

- 8.7 In terms of a situation where the Co-op continues to trade, then accessibility to top-up convenience shopping provision will be broadly similar for existing and new residents, with the existing residents generally closer to the Co-op and new residents closer to the new centre.
- 8.8 However, if the Co-op closes or relocates, then existing Alderholt residents will be faced with a considerably longer journey to undertake their top-up shopping and in terms of Policy KS11 their access to convenience store provision would be worse than currently.
- 8.9 Further, increasing the distance that needs to be travelled to access top-up shopping, risks decreasing the number of journeys made by sustainable modes of travel, with a potential increase in the number of people choosing to use their car. This also increases the risk that having decided to do this, they may then use a preferred outlet further afield.
- 8.10 This will always be a greater concern where a population is older, meaning fewer of the residents may be able to walk a longer distance and for whom cycling may not be an option. This would include Alderholt where the number of residents aged over 65 is 35% higher than the average for England and Wales:

Alderholt Population – 2021 Census

| | Comparators | | | | |
|-------------|-------------|------------|-------------|----------------|-------------------|
| | Total | Percentage | Dorset East | Dorset Council | England and Wales |
| All Persons | 3,262 | - | 88,863 | 379,791 | 59,719,724 |
| All Males | 1,609 | 49.3% | 48.3% | 48.9% | 49.5% |
| All Females | 1,653 | 50.7% | 51.7% | 51.1% | 50.5% |
| 0-15 yrs | 551 | 16.9% | 15.4% | 15.7% | 19.1% |
| 16-64 yrs | 1,890 | 57.9% | 52.9% | 54.9% | 62.2% |
| 65+ yrs | 821 | 25.2% | 31.7% | 29.4% | 18.6% |

Source: <https://gi.dorsetcouncil.gov.uk/insights/areaprofiles/Parish/alderholt>

- 8.11 I therefore conclude that were the local centre development to lead to the closure or relocation of the Co-op, then the loss would be contrary to this part of Policy KS11, in that the need to travel for convenience shopping would be increased for existing Alderholt residents. I consider there is also a

risk that alternative modes of travel other than the car may be discouraged due to the distances involved.

- 8.12 In terms of the other proposed uses in the local centre, these will represent new facilities within the village and their introduction has the potential to reduce the need for existing residents to travel to Fordingbridge or Verwood for regularly purchased non-food items and some more frequently used retail services.
- 8.13 A more central location for the local centre would have the potential to improve accessibility for existing residents and would support the other reasons for promoting an alternative location as set out in other Proofs of Evidence.

9. SUMMARY AND CONCLUSIONS

9.1 My name is Christine Reeves. I am a qualified town planner specialising in retail and town centre development and a member of the Royal Town Planning Institute.

9.2 I am instructed to appear at this Planning Inquiry by Dorset Council to provide evidence in relation to two of the reasons for the refusal of Application Ref: P/OUT/2023/01166. This sought permission for a mixed use development including up to 1,700 dwellings and a village centre. The reasons for refusal relevant to my Proof are:

- Reason for Refusal 3 - The submitted masterplan does not demonstrate how the proposed uses will function well in terms of their relationship to each other and to the existing settlement of Alderholt. In particular, the positioning of the local centre is not considered to be optimised to accommodate and sustain an appropriate mix of development. Contrary to paragraph 130 of the NPPF; and
- Reason for Refusal 5 - The proposal includes uses defined in Annex 2 of the NPPF as 'main town centre uses' expected to total 2,958sqm and include 1,259sqm of retail. The application is not accompanied by a sequential test or retail impact assessment, contrary to Policy KS7 of the Christchurch and East Dorset Local Plan: Part 1, 2014, and to paragraphs 87 and 90 of the NPPF.

PLANNING POLICY

9.3 The development plan and policies within it relevant to the determination of the appeal are set out in the Statement of Common Ground and I believe both parties consider that the following are relevant in terms of the retail and main town centre uses proposed in the local centre:

- Policy KS2 - Settlement Hierarchy;
- Policy KS6 - Town Centre Hierarchy; and
- Policy KS7 - Role of Town and District Centres
- Policy PC5 - Shops and Community Facilities in Local Centres and Villages.

9.4 It is also agreed that the NPPF is a material consideration, particularly paragraphs 90 – 95 and Annex 2, as is the Planning Practice Guidance for Town Centres and Retail.

9.5 The Appellant considers Policy LN7 – Community Facilities and Services to be relevant. I disagree that it is relevant to my consideration of retail and town centre policy, as the uses referred to in the policy are not main town centre uses.

9.6 I also consider that Policy KS11 – Transport and Development is relevant in relation to the potential impact of the proposed local centre on the existing Co-op. It is also relevant to Reason for Refusal 3 relating to the location of the proposed centre.

THE DEVELOPMENT PROPOSAL

9.7 In order to assess whether the proposed development complies with the relevant policy tests, it is first necessary to understand the nature of the proposed local centre development.

9.8 As there are discrepancies and a lack of clarity in terms of what would be provided in terms of the Appellant's submissions, for the purposes of my Proof I have assumed that the retail and town centre elements will be consistent with those tested in the Retail and Sequential Test Assessments report. This report was provided after the application was determined and seeks to address Reason for Refusal 5.

ASSESSMENT AGAINST POLICY

- 9.9 It is agreed with the Appellant that, provided the development is consistent with a local centre offer that there are locational requirements that mean the centre can only be provided in Alderholt. It is also agreed that there is no defined centre for Alderholt and no 'sequential test' requirement to consider other locations within the village for the development. Compliance with the sequential test as required by Policy KS7 and the NPPF has therefore been demonstrated.
- 9.10 It is agreed with the Appellant that the impact on defined town centres in the area would not be significantly adverse, provided the scale of development is limited to that appropriate for a local centre. The proposed development has therefore been shown to be in accordance with the impact tests set out in Policy KS7 and the NPPF.
- 9.11 It is agreed that the proposed development and specifically the inclusion of a local convenience store within the local centre will have a negative impact on the existing Co-op in Alderholt. It is also agreed that as the level of impact has the potential to lead to the closure of the store, it needs to be assessed against Policy PC5 of the Local Plan.
- 9.12 I consider that the proposed development would be contrary to the second part of this policy if it were to lead to the closure of the Co-op, as the justification for the closure is not one of the acceptable reasons set out in the policy.
- 9.13 Replacement provision may offset this negative impact, but, at the same time would not improve the convenience facilities available. In such a situation my view is that the proposal should be considered neutral in terms of this policy, with the benefits of new provision outweighed by the closure of the existing facilities.
- 9.14 I also consider that the replacement of the existing convenience store would not improve the range or quality of services available in the village and as such simply replacing the existing store would not represent sustainable development as required by the NPPF.
- 9.15 I consider that were the Co-op to close, the proposed local centre would also be contrary to part of Policy KS11 which seeks to reduce the need to travel, provide improved access to key services and facilities and promote alternative modes of travel.
- 9.16 Convenience store provision is a key service in Alderholt and replacing the existing Co-op with a new store in the current local centre location, would result in a considerably longer journey for top-up shopping for existing residents. This could be expected to increase the likelihood of residents using their car to undertake a shopping trip, which could also encourage longer trips to other locations.

CONCLUSIONS

- 9.17 The original Reason for Refusal No. 5 has been addressed by the submission of the Retail Impact and Sequential Tests Assessment report as part of the appeal process.
- 9.18 A review of this document confirms that the proposed local centre has the potential to improve accessibility to facilities that would meet the day to day shopping and service needs of local residents, and, at an appropriate scale of development, it is agreed that the local centre development would comply with the sequential and impact tests set out in Local Plan Policy KS7.
- 9.19 However, the development must not be of a scale that would compete with the higher order centres of Verwood and Fordingbridge, as compliance with the sequential and impact tests for this form of development has not been demonstrated. This could be controlled by condition.

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- 9.20 Even if the scale and form of the local centre is controlled, there is a risk that the competition from the proposed convenience store could lead to the closure of the existing Co-op. This would be contrary to Policy PC5 of the Local Plan, while replacement of facilities would simply negate any benefits. It would also be contrary to the general principle of sustainable development [NPPF, para 7].
- 9.21 The closure of the Co-op would also increase the distance local residents have to travel to access top-up shopping facilities and could increase car usage. This would be contrary to Policy KS11 of the Local Plan. This could be addressed by considering a more central location for the local centre.

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APPENDICES

APPENDIX CR/1: APPRAISAL OF RETAIL IMPACT AND SEQUENTIAL TESTS
ASSESSMENTS – PREPARED BY LSH (April 2024)

APPENDIX CR/2: EXTRACTS FROM EXPERIAN RETAIL PLANNER BRIEFING NOTE 21
(FEBRUARY 2024)

APPENDIX CR/3: EXTRACTS FROM BOURNEMOUTH, CHRISTCHURCH AND EAST
DORSET JOINT RETAIL AND LEISURE STUDY VOLUME 2 - CHRISTCHURCH AND EAST
DORSET

APPENDIX CR/4: LOCAL CENTRE COMPOSITION – ALTERNATIVE OPTIONS PROPOSED
BY APPELLANT

**APPENDIX CR/1: APPRAISAL OF RETAIL IMPACT AND
SEQUENTIAL TESTS ASSESSMENTS – PREPARED BY LSH (April 2024)**

ALDERHOLT APPEAL (REF: APP/D1265/W/23/3336518

**APPRAISAL OF RETAIL IMPACT & SEQUENTIAL TEST
ASSESSMENTS**

REPORT PREPARED BY:

**LAMBERT SMITH
HAMPTON**

FOR:

Dorset Council

April 2024

| | |
|--------------------------|------------------------|
| Prepared by: | Christine Reeves MRTPI |
| | |
| Report Issue Date: | 11 April 2026 |

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1. INTRODUCTION

- 1.1 Lambert Smith Hampton (LSH) has been instructed by Dorset Council (the Council / LPA) to undertake an appraisal of the Retail Impact and Sequential Test Assessments (RISTA) prepared by DPDS and submitted in support of Appeal Ref: APP/D1265/W/23/3336518 relating to land to the south of Ringwood Road, Alderholt, SP6 3DF.
- 1.2 By way of background, an application for a mixed-use development including up to 1,700 dwellings, 10,000sqm of employment space and a village centre was refused planning permission by the Council in July 2023. The reasons for refusal (RfR) include two relating to the retail and main town centre uses of the application:
- *No. 3 - The submitted masterplan does not demonstrate how the proposed uses will function well in terms of their relationship to each other and to the existing settlement of Alderholt. In particular, the positioning of the local centre is not considered to be optimised to accommodate and sustain an appropriate mix of development. Contrary to paragraph 130 of the NPPF; and*
 - *No. 5 - The proposal includes uses defined in Annex 2 of the NPPF as 'main town centre uses' expected to total 2,958sqm and include 1,259sqm of retail. The application is not accompanied by a sequential test or retail impact assessment, contrary to Policy KS7 of the Christchurch and East Dorset Local Plan: Part 1, 2014, and to paragraphs 87 and 90 of the NPPF.*
- 1.3 The Applicant, Dudsbury Homes (Southern) Ltd, has lodged an appeal against the Council's decision and the appeal submission included the RITSA to address Reason for Refusal No 5. The Council has instructed LSH to review this document and provide advice on whether this additional material meets the planning policy requirements relating to retail and town centre policy.
- 1.4 Our findings are set out in this report, which is structured to reflect the original DPDS submission. Therefore:
- Section 2 reviews the retail and town centre elements of the development proposal. It compares what was proposed in the original application submission, with that assumed by DPDS in undertaking their retail assessment and sets out what we have assumed to be the content when reviewing the RITSA.
 - Section 3 provides commentary on the retail and town centre planning policies relevant to the development proposal;
 - Section 4 reviews the sequential assessment provided by DPDS;
 - Section 5 reviews the retail assessment provided by DPDS; and
 - Section 6 sets out our conclusions.

2. THE DEVELOPMENT PROPOSAL

- 2.1 Whilst appreciating that the appeal proposal was submitted in outline, understanding the type and scale of retail and town centre uses intended to be included in the proposed local centre, is key to being able to determine whether the proposed development is in accordance with development plan and national planning policy.
- 2.2 As set out in the RITSA (para 2.2) the level of detail provided at the application stage was very limited with the following Class E Uses proposed within the local centre:
- 1,258 sqm retail (Class E(a))
 - 673 sqm food and beverage (F&B) (Class E(b))
 - 316 sqm community/sports (Class E(d))
 - 724 sqm medical (Class E(e))
 - 1,026 sqm offices (Class E(g)(i))
- 2.3 A further 10,000 sqm of employment space in the form of a business park is proposed in addition to the 4,000 sqm of Class E uses in the local centre. If the application had been approved, the Council proposed to condition this to exclude all Class E uses and DPDS assume this would continue to be the case (RITSA, para 5.2).
- 2.4 Of the 4,000 sqm of Class E uses proposed DPDS indicates that 2,958 sqm would be 'main town centre uses' as defined by Annex 2 of the NPPF (RITSA, para 2.3). This is consistent with information provided with the original application submission. However, we consider that all of the elements, with the exception of the proposed medical uses have the potential to comprise 'main town centre uses', which would total 3,273 sqm gross.
- 2.5 However, the RISTA assesses a more limited quantum of retail and main town centre use floorspace and, for the purposes of appraising the RITSA, this is what we have assumed would be provided, namely:
- 400 sqm gross (280 sqm net) of convenience goods floorspace provided in a single convenience store (Class E(a));
 - 429 sqm gross of comparison goods floorspace (Class E(a));
 - 429 sqm gross of retail service floorspace (Class E(a)); and
 - 673 sqm F&B (Class E(b)) (RITSA, Table 11).
- 2.6 Contrary to what DPDS suggest, this is not consistent with the form of development that could be permitted on the site were the proposed condition set out at para 2.4 of the RITSA to be applied:
- The condition would allow up to 1,700 sqm gross of either convenience or comparison floorspace (or a mixture of both), as there is no condition requiring the inclusion of retail service uses; and
 - The assumed food & beverage element could increase to 1,000 sqm under the condition and specifically includes two Sui generis uses (a public house and hot food takeaway) that are not included in the description of development.
- 2.7 DPDS is also specific in stating that the retail floorspace would be provided in small units (RITSA, para 2.3) and advise on the assumed mix of uses at para 5.56. This suggests the largest unit on site would be the 400 sqm gross convenience store, with 6 units providing comparison goods and retail services and a total of 643 sqm of food & beverage space in an unspecified number of units.

- 2.8 Not only is the food & beverage floorspace inconsistent with what is assessed (673 sqm) but the proposed condition would allow retail units of up to 500 sqm each (RITSA, para 2.4). The development could therefore comprise just 4 units for retail use (3 x 500 sqm and 1 x 200 sqm) and 2 units in food & beverage use.
- 2.9 This is not the form of development tested in the RITSA and could result in a very different form of development. We therefore consider the proposed condition is irrelevant to our current advice and for the purposes of our appraisal we assume that should the development be allowed, the main town centre uses permitted would be adequately conditioned to ensure they are restricted to those tested in the RITSA and as set out in paragraph 2.5 above.
- 2.10 For similar reasons we also assume that the food and beverage uses would not include either a public house or hot food takeaway, given these are sui generis uses and were not included within the original application description.
- 2.11 This anomaly is noted by DPDS (RITSA, para 2.5) who suggests that the Applicant (now Appellant) may seek to amend the description of development. As far as we are aware this has not been done and we are unsure whether the Appellant is seeking to include such uses.
- 2.12 Related to this, we also disagree with DPDS that this makes no difference to the assessments provided (RITSA, para 2.5) as understanding the proposed mix of uses is essential to assessing trade draw, particularly in relation to the inclusion of a public house, given existing provision in Alderholt (RITSA, para 2.9).
- 2.13 We also give no weight to the 'sensitivity testing' provided at paras 5.56 – 5.58, as insufficient information is provided on how the convenience and comparison offer, turnover and impacts would vary. This is particularly important with respect to the impact on the Alderholt Co-op.

Assumed Opening Date

- 2.14 We note that an opening date of 2030 has been assumed for the local centre, and consider this appropriate, although whether the completion of 600 homes by that date will be sufficient to attract the necessary tenants is unknown. Use of 2032 for testing impact is also considered appropriate, although we would note that given this is 8 years away, all expenditure forecasts will need to be treated with a degree of caution. This is because of the uncertainty inevitably associated with longer terms forecasts and in particular any assumptions regarding the expected growth in comparison spend.

Scale And Function of Development

- 2.15 Also relevant to our appraisal is the scale and function of development which is considered at paras 3.18 – 3.20 of the RITSA.
- 2.16 DPDS seeks to suggest that the proposal is acceptable by providing a numerical assessment that concludes that a market share of 11% in the Alderholt area is appropriate for serving local needs.
- 2.17 Ignoring the actual numbers at this stage, we consider that such an approach is flawed in two major respects:
- It fails to give any consideration to the existing position in Alderholt and whether there is surplus capacity (or indeed deficiency) within the existing services that new development could support; and
 - It does not consider whether the proposed provision is consistent with that provided in local centres elsewhere, or whether the scale of provision is more consistent with a higher order centre in the retail hierarchy.

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- 2.18 It also fails to consider whether the scale and function of the centre is appropriate when the other proposed uses are included. Further information is therefore required from the appellant on the overall centre offer and this then needs to be with provision in the other Rural Service Centres in the area, namely Cranborne, Sixpenny Handley, Sturminster Marshall and Three Legged Cross. It may also be appropriate to compare the proposed offer (not turnover), with what is provided in higher order town centres, to ensure that Alderhot's provision is appropriate.

3. RETAIL AND TOWN CENTRE PLANNING POLICY

- 3.1 The review of planning policy provided by DPDS (RITSA, Section 3) is relatively brief and we generally agree that the key planning policies and material considerations have been identified, although we do not necessarily agree with the detailed interpretations of the policies provided.
- 3.2 In particular, we have concerns regarding the interpretation of Policy PC5 Shops and Community Facilities in Local Centres and Villages. This provides in principle support for planning applications which propose improvements to the provision of shops in villages, provided they are intended to provide for people's day to day needs and leisure uses including public houses and facilities for local communities. The policy also resists the loss of existing retail premises, leisure and other local facilities unless it is clearly demonstrated there is insufficient demand and it is not feasible and viable to support their continued existence and the loss would not result in a substantial decline in the range and quality of services for local people.
- 3.3 The policy therefore provides no support for the DPDS approach to impact that seeks to argue that the closure of the Co-op would be acceptable (RITSA, paras 5.3 and 5.54) because the loss of facilities is only supported where:
- there is insufficient demand; AND
 - it is not feasible and viable to support their continued existence; AND
 - the loss would not result in a substantial decline in the range and quality of services for local people.
- 3.4 Instead, our view is that Policy PC5 supports the proposed uses at Alderholt in principle but resists the loss of existing facilities, given the reasons for the loss (ie competition) would not meet the criteria in the policy. The policy itself does not indicate where the balance would be in the case of a proposal that replaces facilities, but we would suggest that there is a case that, in terms of the principle of encouraging sustainable development, supporting existing provision should take precedence.
- 3.5 DPDS also refers to Policy LN7 Community Facilities and Services (RITSA, para 3.9) which replicates much of Policy PC5 in terms of facilities in local centres and villages. The policy defines the facilities in question as being uses such as education, health, libraries, facilities for older people / children and young people and community buildings. Whilst some of these uses may also be considered to be town centre uses, we are not aware that the proposed local centre is intended to provide any of the above. As such we do not consider this policy to be relevant to the current consideration.
- 3.6 We do however consider that Policy KS11 Transport and Development is relevant to the determination of the appeal. This policy indicates that the Council will use their planning powers to influence development so that it reduces the need to travel, provides improved access to key services and facilities and promotes alternative modes of travel. The location of the local centre within the proposed residential development and connectivity to the existing residential areas is a planning policy consideration, albeit, not one DPDS considers.

4. SEQUENTIAL ASSESSMENT

- 4.1 In terms of the sequential test assessment provided by DPDS we do agree that, provided that the development is consistent with a local centre offer, then there are locational requirements that mean the local centre element of the appeal proposal could not be located anywhere other than in Alderholt.
- 4.2 We therefore agree that it is not appropriate to consider sites in Fordingbridge or Verwood (RITSA, para 4.5) provided the scale of development and proposed uses are restricted to uses that will solely serve the local Alderholt community.
- 4.3 Further, given there is no defined centre for Alderholt (RITSA, para 4.5), we do not consider that there is a 'sequential test' requirement to consider other sites in the village
- 4.4 However, we do believe that consideration needs to be given to Policy KS11 Transport and Development and the extent to which the development reduces the need to travel and provides improved access to key services and facilities and promotes alternative modes of travel.
- 4.5 This is relevant to RfR No. 3 but has not been considered by DPDS. We will consider this further in Ms Reeves' Proof of Evidence.
- 4.6 We would also note that if the local centre were to take a different form and comprise just 6 larger units for retail and food & beverage use (RITSA, para 2.4), then the catchment for the development would be different and it may be relevant to consider potential sites in or on the edge of other centres in the area.

5. IMPACT ASSESSMENT

- 5.1 The quantitative impact assessment provided by DPDS is Section 5 of the RISA and the step-by-step approach adopted is considered to be generally appropriate. However, we consider that there are a number of deficiencies in the assessment overall which mean that it cannot be relied upon to determine the likely impact of the proposed development.
- 5.2 To assist with developing any future Statement of Common Ground relating to impacts therefore, we have divided our comments into those where we are generally in agreement with the approach adopted (or where any differences in opinion or assumption would be unlikely to affect the conclusions regarding the likely impact of the development) and those where we disagree with DPDS on key matters.

Areas of Agreement

- 5.3 The use of the Dorset Retail and Leisure Study Update (DRLSU) is an appropriate source of data and retaining the 2020 price base is acceptable (RITSA, para 5.2). The identified step-by-step approach (RITSA, para 5.4) is also appropriate.
- 5.4 The catchment area (RITSA, para 5.6) is also realistic, provided the local centre is developed as assessed in the RITSA, with not more than the proposed retail floorspace proposed (RITSA, Table 11). However, it is also important that any other use in the centre (ie those not defined as main town centre uses) also do not provide an offer that would be likely to attract trade from a wider area.
- 5.5 Assuming this to be the case, then the main town centres that need to be considered in terms of impact are Verwood (RITSA, para 5.7) and Fordingbridge (RITSA, para 5.12).
- 5.6 We would also agree that the turnover of the proposed centre appears to be reasonable (Table 11), assuming these are 2022 figures.

Matters of Concern with the Impact Assessment

- 5.7 Notwithstanding our view that the approach adopted by DPDS in assessing the quantitative impact of the local centre development, we consider that there are serious questions over other elements of the assessment that mean it cannot be relied upon. Reasons for this include:
- Failure to distinguish between in centre and out of centre retail provision in the neighbouring centres such as Verwood and Fordingbridge (Tables 5 – 9). Spend is then incorrectly assigned to the respective town centres in Table 10 and therefore town centre performance could be significantly overstated, particularly for convenience sales (para 5.32). As a result the subsequent impact analysis (Table 13a) does not assess impacts on town centres as required by policy;
 - Reliance on a benchmark sales density to estimate the existing turnover of the Co-op store in Alderholt (para 5.39). Given the importance of understanding the impact the local centre may have on this store, the lack of evidence as to actual performance is a major shortcoming;
 - Failure to properly assess F&B expenditure in the study area (RITSA, paras 5.22 – 5.23). Information on spend in the area is available from Experian, whilst the quoted ONS figure appears to overstate expenditure by including hotel spend. There is also no evidence to support the claim that expenditure per head in Alderholt will be significantly higher than in the UK as a whole (RITSA, para 5.23);

- No evidence that the proposed convenience store would only draw 90% of its trade from the catchment area (para 5.44) or that it will be able to claw back trade a significant amount of trade from the stores in Verwood and Fordingbridge (Table 12 and para 5.46), when the proposed store will provide a similar offer to the existing Co-op;
- It is incorrect to assume that the proposed comparison floorspace would have no impact on the Alderholt Co-op (Tables 12 and 13c). There is no clarity provide as to the type of comparison goods that would be sold, but we would expect them to be 'lower order' goods purchased on a regular basis to meet day to day shopping needs. As a result there could be at least some overlap in the comparison offer within the separate units. It would also be expected that there would be overlap with any comparison offer in the proposed convenience store, although this is not assessed;
- No justification for the assumption that 65% of comparison trade would be drawn from locations other than Alderholt, Verwood and Fordingbridge (Table 12 and para 5.47). Our view is that any comparison offer in the centre would be similar to that provided in existing shops in the immediate area and therefore most, if not all the trade would come from this immediate area. DPDS seem to be suggesting that 65% of centre sales would come from fashion, furniture, household furnishings and electrical and other goods (para 5.47). This is unrealistic if the preproposed offer is to be of the scale and type normally seen in a local centre; and
- There is no justification to support the suggestion that initial negative impacts would not result in store closures (para 5.51).

5.8 We would also note:

- There is no information on the source for Fordingbridge town centre's turnover (RITSA, para 5.15);
- There is an inconsistency in the population projections between para 5.18 of the RITSA and Table 3. We believe the latter to be correct;
- The assessment needs to acknowledge that the key figures for assessment, which relate to 2032 are extrapolated from the DRLSU (paras 5.19 & 5.42);
- Any reference to the situation in 2040 must be treated with caution, consistent with the advice in the DRLSU (paras 1.8, 5.6 and 7.26);
- No source is provided for the assumed splits between comparison goods or F&B expenditure (Paras 5.33 and 5.34) and
- The F&B impact has not been properly assessed as the nature of the proposed offer is not consistent with what has been proposed by the Appellant (para 5.55).

5.9 However, our main concern relates to the potential impact on the Alderholt Co-op. DPDS provide no information on the existing performance of the store, nor can they justify their assumptions in para 5.53. In particular, it cannot be assumed that the Co-op would be prepared to continue trading if another store were to take around half its trade. Thus, the effect of this store closing needs to be properly assessed in terms of Policy KS11.

5.10 We also have concerns as to the cumulative impact of the proposed development given the scale of the centre and the mix of uses proposed and consider more clarity is required from the Appellant on the proposed end uses and how this offer will be secured by planning conditions.

6. CONCLUSIONS

- 6.1 The reasons for refusing planning permission for the proposed mixed-use development at Alderholt included one relating to the Applicant's failure to provide a sequential test or impact assessment. We consider this reason for refusal was justified on the basis of local and national planning policies.
- 6.2 To address this RfR DPDS has now prepared a report considering whether the development complies with the sequential test and assesses the impact of the proposed centre. However, the assessment provided is for a form of development that is not consistent with the original application submission, nor with the type of development that could be brought forward under the planning condition proposed by DPDS.
- 6.3 As a result, we consider that, whilst compliance with the sequential test has been demonstrated if the form of development is sufficiently controlled to ensure it provides for local needs only, there is uncertainty as to whether this is likely to be the outcome.
- 6.4 We also consider that the impact assessment provided is flawed and therefore cannot be relied upon to assess the impact of the proposed local centre, even assuming the type of development is suitable for a local centre.
- 6.5 With regards to the effect on the existing offer in Alderholt, we disagree with the policy interpretation provided by DPDS (para 5.3), our view being that the starting point is that the loss of existing retail premises, leisure and other local facilities will be resisted.

Next Steps

- 6.6 With limited time before the appeal will be considered by the appointed Planning Inspector, we consider that it would be helpful to progress discussions with DPDS and the Appellant/ Appellant's agent, to agree the assumptions regarding the form and content of the proposed local centre. This needs to be consistent with what is assumed in other application and appeal documents and in accordance with the description of development.
- 6.7 This will also require agreeing conditions as to how the amount of space and its end uses would be controlled to ensure no significant changes can be made from the form of development tested.
- 6.8 Once this has been agreed, we would hope to be able to agree further details in a Retail Statement of Common Ground.

--- Ends ---

**APPENDIX CR/2: EXTRACTS FROM EXPERIAN RETAIL PLANNER
BRIEFING NOTE 21 (FEBRUARY 2024)**



Retail Planner

Briefing Note 21

February 2024



Appendix 2

Estimating consumer spending on retail goods and leisure

Sources

Total household spending on goods and leisure is derived from the ONS' (Office for National Statistics) publication: Consumer Trends. We have used historic data to 2023Q3 taken from the issue published on 22nd of December 2023, which shows expenditure at 2019-based prices. Consumer Trends provides data breaking down total household spending according to the internationally recognised COICOP (Classification of Individual Consumption by Purpose) categories. This is consistent with the definitions used in the ONS' National Accounts (Blue Book) and therefore includes spending in the UK by foreign households. Leisure spending is aggregated from COICOP categories as shown below.

Consumer Trends data are based on surveys of consumers. There is a difference which is generally not significant from the figures reported monthly in the ONS' Retail Sales Statistical Bulletin which is based on surveys of shops and other businesses.

Aggregations

Retail Planner contains a number of special aggregations of retail goods and services:

- 1. Convenience goods** – low-cost, everyday items that consumers are unlikely to travel far to buy. Defined as food and non-alcoholic drinks, tobacco, alcohol, newspapers and 90% of non-durable household goods.*

- 2. Comparison goods** – all other retail goods.

Bulky goods – defined as:

- DIY goods
- Furniture and floor coverings
- Major household appliances whether electric or not.
- Audio-visual equipment
- Remaining 10% of non-durable household goods
- Bicycles.

Non-bulky goods – all other comparison goods

- 3. Leisure**

Recreational and sporting services (COICOP 9.4.1)

Cultural services (COICOP 9.4.2)

Games of chance (COICOP 9.4.3)

Restaurants, cafes etc (COICOP 11.1.1)

Accommodation services (COICOP 11.2)

Hairdressing salons & personal grooming (COICOP

12.1.1)

*Non-durable household goods comprise cleaning materials, kitchen disposables, household hardware and appliances, kitchen gloves, cloths etc and pins, needles, tape measures and nuts and bolts. We have assumed, based on Expenditure and Food Survey (EFS) data, that 10% of non-durable household goods are DIY-type goods and, therefore, are properly classified as comparison goods while the remaining 90% have the characteristics of convenience goods

Appendix 5

Estimates of spending on retail goods in 2021 – coarse categories

| 2022 Household Spending (current prices £m) | | Total spending | Spend by foreigners | UK residents spend in UK | UK spend per head |
|---|---|----------------|---------------------|--------------------------|-------------------|
| COICOP | Description | | | | |
| 1 | Food and non-alcoholic beverages | 124,039 | 2,349 | 121,690 | 1,796 |
| 2.2 | Tobacco | 19,745 | 301 | 19,444 | 287 |
| 2.1 | Alcohol (off trade) | 23,522 | 262 | 23,260 | 343 |
| 9.5.2 | Newspapers and periodicals | 3,526 | 90 | 3,436 | 51 |
| 3.1.1, 3.1.2, 3.1.3 | Clothing materials & garments | 59,518 | 6,548 | 52,970 | 782 |
| 3.2.1 | Shoes and other footwear | 10,467 | 871 | 9,596 | 142 |
| 4.3.1 | Materials for maintenance & repair of the dwelling | 1,277 | 71 | 1,206 | 18 |
| 5.1.1, 5.1.2 | Furniture and furnishings; carpets & other floor coverings | 31,203 | 226 | 30,977 | 457 |
| 5.2 | Household textiles | 7,324 | 71 | 7,253 | 107 |
| 5.3.1 | Major household appliances whether electric or not | 9,761 | 155 | 9,606 | 142 |
| 5.3.2 | Small electric household appliances | 1,467 | 126 | 1,341 | 20 |
| 5.5.1, 5.5.2 | Tools and miscellaneous accessories | 7,440 | 13 | 7,427 | 110 |
| 5.4 | Glassware, tableware and household utensils | 7,445 | 38 | 7,407 | 109 |
| 5.6.1 | Non-durable household goods | 7,434 | 289 | 7,145 | 105 |
| 6.1.1, 6.1.2 | Medical goods & other pharmaceutical products | 8,715 | 88 | 8,627 | 127 |
| 6.1.3 | Therapeutic appliances and equipment | 3,374 | 0 | 3,374 | 50 |
| 7.1.3 | Bicycles | 1,915 | 84 | 1,831 | 27 |
| 9.1.4 | Recording media | 5,738 | 45 | 5,693 | 84 |
| 9.2.2, 9.3.1, 9.3.2 | Games, toys & hobbies; sport & camping equip.; musical instr. | 23,551 | 126 | 23,425 | 346 |
| 9.3.3 | Gardens, plants and flowers | 6,517 | 0 | 6,517 | 96 |
| 9.3.4 | Pets and related products | 9,857 | 0 | 9,857 | 145 |
| 9.5.1, 9.5.3, 9.5.4 | Books & stationary | 11,730 | 45 | 11,685 | 172 |
| 8.2.9.1.1, 9.1.2, 9.1.3 | Audio-visual, photographic & info processing equip. | 16,765 | 184 | 16,581 | 245 |
| 12.1.2, 12.1.3 | Appliances for personal care | 24,774 | 172 | 24,602 | 363 |
| 12.3.1 | Jewellery, clocks and watches | 10,141 | 88 | 10,053 | 148 |
| 12.3.2 | Other personal effects | 2,340 | 13 | 2,327 | 34 |
| | Total convenience | 177,523 | 3,263 | 174,260 | 2,571 |
| | Total comparison | 262,062 | 8,991 | 253,071 | 3,734 |
| | Total retail | 439,585 | 12,254 | 427,331 | 6,305 |

Source: ONS



Appendix 6

Classification of retail spending

| Convenience | Comparison | Bulky | Non-bulky C |
|-----------------|---|-------|-------------|
| COICOP | | | |
| 02.2 | Tobacco | | |
| 02.1.3 | Beer | | |
| 01.1 | Food & non-alcohol | | |
| 02.1.2 | Wine | | |
| 02.1.1 | Spirits | | |
| 09.5.2 | Newspapers & mags | | |
| 05.6.1 | Household cleaning materials and misc items | | |
| 05.5.1 | Major tools | | |
| 09.1.1/3 | Audio-visuals | | |
| 04.3.1 | Materials for repair & maintenance of homes | | |
| 05.5.2 | Small tools | | |
| 05.1.1;05.1.2 | Furniture & floor coverings | | |
| 05.3.1 | Major appliances | | |
| 07.1.3 | Bicycles | | |
| 03.1.1/3 | Clothing | | |
| 05.3.2 | Small appliances | | |
| 09.5.1;09.5.3/4 | Books, stationery etc | | |
| 05.4 | Utensils | | |
| 03.2.1 | Footwear | | |
| 06.1.3 | Therapeutics | | |
| 12.3.1 | Jewellery | | |
| 09.1.4 | Recording media | | |
| 12.1.2/3 | Personal care goods | | |
| 05.2 | Textiles | | |
| 06.1 | Medical goods | | |
| 12.3.2 | Other personal effects | | |
| 09.3.1/4 | Other recreational goods | | |

**APPENDIX CR/3: EXTRACTS FROM BOURNEMOUTH,
CHRISTCHURCH AND EAST DORSET JOINT RETAIL AND LEISURE
STUDY VOLUME 2 - CHRISTCHURCH AND EAST DORSET**

Bournemouth, Christchurch and East Dorset Joint Retail and Leisure Study

Volume 2 - Christchurch and East Dorset

11 December 2017

LICHTFIELDS

Verwood Town Centre

3.60 Verwood is designated as a Town Centre, within the top tier of the retail hierarchy, alongside Christchurch, Ferndown and Wimborne. It provides an important service and employment function.

Verwood has a limited selection of retail and service uses, and its key roles include:

- **Convenience shopping** – in the centre there is a small Tesco Express (254 sq.m net) suitable for top up shopping. This is supported by a butcher and greengrocer. The main supermarket is the large out of centre Morrison's store (3,303 sq.m net).
- **Comparison shopping** – there is a limited range of comparison shops, comprising primarily of small independent specialist traders and charity shops.
- **Services** – there is a range of service uses, including, a post office, banks, estate agents, hairdressers, travel agent, accountants and a dry cleaners.

3.61 The household shopper survey (Volume 1, Appendix 6) provides an indication of the role of Verwood. Verwood attracts most of its non-food expenditure from Zone 5: Ferndown/Verwood and Zone 11: Ringwood/Fordingbridge, but it attracts a very small market share of household expenditure, 4.2% and 0.5% respectively. Verwood attracts a higher market share of convenience goods expenditure from these two zones, i.e. 30.4% and 11.1% respectively.

3.62 These results suggest Verwood serves a small local catchment area for non-food shopping. The Morrison's store in Verwood attracts a higher market share of main food and grocery shopping trips from these two zones.

3.63 The convenience goods expenditure attracted to Verwood is £52.75 million in 2017 (Volume 1, Appendix 2), which is equivalent to 16.4% of the total convenience goods spending attracted to Christchurch and East Dorset's stores and centres. The comparison goods expenditure attracted to Verwood is £10.57 million in 2017 (Volume 1, Appendix 3), equivalent to 3.2% of the total comparison goods spending in Christchurch and East Dorset as a whole. Food and beverage expenditure attracted to Verwood is £15.71 million (Volume 1, Appendix 4), 6.8% of the total food and beverage spending within Christchurch and East Dorset.

3.64 The combined turnover of Verwood at 2017 is £123.07 million, split approximately 65% convenience goods trade, 13% comparison goods and 22% food and beverage. This indicates Verwood's main role is a convenience shopping destination.

3.65 Javelin's Venuescore UK rank for Verwood is 2,566th in 2016/17. By way of comparison the centre was ranked 3,152th in 2015/16. The centre was not ranked in years previous to this. At the top of the hierarchy in the local area are the centres of Southampton (ranked 20th), Bournemouth (ranked 72nd), Salisbury (ranked 94th) and Poole (ranked 112th) all of which influence shopping patterns across Christchurch and East Dorset.

Mix of Uses and Retailer Representation

3.66 Verwood has 42 Class A retail/service uses, and is the smallest of the defined Town Centres in terms of the number of units. The diversity of Class A uses present is set out in Table 3.15, and the results are compared with the national average.

3.67 In line with most small town centres, Verwood has a much lower than average provision of Class A1 comparison units. The provision of Class A1 and A2 service uses is much higher than the national average, reflecting the centre's role as a service centre rather than a higher order comparison shopping destination.

Table 3.15 Verwood Use Class Mix by Unit

| Type of Unit | No. of Units | % of Total Number of Units | |
|------------------|--------------|----------------------------|----------------|
| | | Verwood (%) | UK Average (%) |
| A1 – Comparison | 13 | 31.0 | 33.4 |
| A1 – Convenience | 4 | 9.5 | 10.4 |
| A1 – Service | 8 | 19.0 | 13.0 |
| A2 – Service | 13 | 30.9 | 11.8 |
| A3 | 1 | 2.4 | 9.5 |
| A5 | 2 | 4.9 | 6.0 |
| A4 pubs/bars | 0 | 0 | 4.6 |
| Vacant | 1 | 2.4 | 11.2 |
| Total | 42 | 100 | 100 |

Source: Christchurch and East Dorset Councils Land Use Survey (August 2017) and UK Average for all town centres surveyed by GOAD Plans

- 3.68 Verwood has a below average provision of food and beverage outlets (Class A3/A4/A5 units). Verwood has a low vacancy rate with only one vacant unit. This indicates a good balance between the supply and demand for units.

Characteristics of the Shopping Area

- 3.69 The adopted Local Plan defines the Primary Shopping Area and Town Centre boundaries of Verwood around parts of Ringwood Road, Station Road and Manor Road. There are no defined Primary or Secondary Shopping Frontages and the centre is fragmented. During the site visit, the highest footfall was observed around Manor Way, adjacent to the Ferrett Green.

Quality of the Streetscape/Environment

Table 3.16 Quality of the Streetscape/Environment

| Performance Indicator | 2017 Score |
|------------------------------------|------------|
| Quality of paving/street materials | 4 |
| Quality of street furniture | 4 |
| Quantity of street furniture | 4 |
| Quality of public art | 1 |
| Quality of street maps/signage | 4 |
| Quantity of street maps/signage | 3 |
| Quality of street lighting | 4 |
| Quantity of street lighting | 4 |
| Quality of commercial units | 3 |
| Quality of planting/landscaping | 4 |
| Quantity of planting/landscaping | 4 |
| Quantity of public open space | 4 |
| Quality of public open space | 4 |
| Evidence of CCTV coverage | 2 |
| Perception of safety | 4 |

Source: Lichfields' Analysis

- 3.70 The quality of the streetscape/environment in Verwood was considered to be good to very good. There is an attractive Green with benches, mature trees and public toilets. Shops and Costa Coffee offer outdoor seating overlooking the Green. The commercial shopfronts/fascia are generally of good quality, but some buildings have limited architectural merit. The cleanliness of

Verwood was considered very good/excellent overall, with limited evidence of litter, vandalism, graffiti or fly posting.

Cleaning and Maintenance

Table 3.17 Cleaning and Maintenance

| Performance Indicator | 2017 Score |
|----------------------------|------------|
| Litter and street cleaning | 4 |
| Vandalism/Graffiti | 5 |
| Fly-posting | 5 |

Source: Lichfields' Analysis

Accessibility and Movement

Table 3.18 Accessibility and Movement

| Performance Indicator | 2017 Score |
|--|------------|
| Width of pavements | 4 |
| Pedestrian/vehicular conflict | 3 |
| Traffic congestion | 4 |
| Frequency of pedestrian crossings | 3 |
| Location and convenience of car parks | 5 |
| Quality of bus stops/shelters | 4 |
| Location/convenience/number of bus stops | 4 |
| Well signed to town centre/car parks | 4 |

Source: Lichfields' Analysis

3.71 Pedestrian movement in and around Verwood was considered good. A main road (B3081) runs through the centre, but at the time of the site visit this road was not congested. In terms of car parks, there is a good provision available in, or within, close proximity to the centre.

Views of Customers

3.72 Respondents to the household survey were asked which of the defined centres in Bournemouth, Christchurch and East Dorset they had visited for shopping in the last 12 months. Those who had visited Verwood in the last 12 months were then asked what would make them shop more often in Verwood. Figure 3.4 below shows the main responses to the question:

Figure 3.4 Household Survey Results – What would make you shop more in Verwood



Source: NEMS Household Survey Results April 2017

- 3.73 Of the respondents who suggested improvements to Verwood, the majority mentioned better choice of shops in general, a better choice of clothing shops and a better quality of shops. Whilst other improvement measures were mentioned, the number of people who suggested these improvements was low.

SWOT Analysis

- 3.74 The SWOT analysis below is based on Lichfields' audit of the Town Centre and the household survey results.

Strengths

- Attractive environment, with a local village feel.
- There are a number of convenient and public car parks located in close proximity to the centre.
- The proportion of vacant units is below the national average, suggesting a good balance between supply and demand for units.
- There is a low perception of crime or anti-social behaviour.
- The centre is clean, with little evidence of litter, vandalism, graffiti or fly posting.

Weaknesses

- Verwood relies upon out of centre food store provision to attract the majority of customers.
- The centre has a limited comparison offer, attracting a low market share of comparison goods spending within the study area.
- The centre has a low proportion of national multiple retailers.
- There is a lack of leisure uses and evening economy uses.

Opportunities

- Potential to improve the retail/leisure offer.
- Improvements in Verwood's leisure offer may increase visitors within the centre, which in turn will offer an opportunity for an increased food and beverage uses.

Threats

- The continued polarisation of investment within other larger centres may limit operator demand for new premises in Verwood. Lower commercial values may affect the viability of regeneration proposals.
- Lack of development sites to accommodate new investment.

**APPENDIX CR/4: LOCAL CENTRE COMPOSITION – ALTERNATIVE
OPTIONS PROPOSED BY APPELLANT**

Local Centre Proposal (floorspace is gross and in sqm unless otherwise stated)

| Use Class | Convenience Retail E(a) | Comparison Retail E(a) | Retail Service E(a) | Food & Beverage E(b) | Public House Sui Generis | Hot Food Takeaway Sui Generis | Community/ Sports E(d) or F.2(b)/F.2(c) | Medical E(e) | Offices E(g)(ii) | Total Floorspace | Total Main Town Centre Uses |
|------------------------------------|--|---|------------------------|---|-----------------------------|----------------------------------|--|-----------------------------------|---|---------------------|-----------------------------------|
| Application submission | 1,258 | | | 673 | None | None | 316 | 724 | 1,026 | 3,997 | 3,273 |
| RITSA Description (para 2.3) | Maximum 280 sqm net (approx 400 sqm gross) | 858 sqm in 6 units | | 673 | Included | Included | | | | | |
| RITSA Impact Assessment (Table 11) | 400 | 429 | 429 | 673 | | | Not assessed | N/A | Not assessed | 1,931 | 1,931 |
| RITSA Condition | 1,700 | | | 1,000 | | | | | No unit shall be over 500 sqm | 4,000 | 1,700 |
| | No unit shall be over 500 sqm | | | | | | | | | | |
| Goadsby GRYO & CPDVR | 334 One unit | 925 7 units including pharmacy. Sizes range from 72 - 246 sqm gross | | 673 Public house/restaurant. No reference to any other F&B provision | | Not referenced | 316 | 724 Doctor's Surgery & Dentist | 1,026 Provided in 4 offices & a business hub | | |