

2017

Borough Council of King's  
Lynn & West Norfolk

Planning Policy

# [RETAIL OVERVIEW: KING'S LYNN TOWN CENTRE – BACKGROUND PAPER]

May 2017

## Summary

The paper concludes that there is still a need to provide for an additional 20,000 m<sup>2</sup> of retail floorspace in King's Lynn Town Centre. This provision should be supported by a raft of other policy measures supporting the King's Lynn Town Centre Partnership and BID; aiming for a qualitative improvement of the town centre; and fighting current deficiencies. Redevelopment of vacant units and sites to house new development should be a focus, but also reuse of smaller units, with strategies for (unused) upper floors.

## Purpose of this Paper

This paper reviews the approach taken to the need for town centre retail floorspace in King's Lynn in the Adopted Core Strategy (CS) (2011) and the Adopted Site Allocations and Development Management Policies Plan (SADMP) (2016).

## Existing Position

King's Lynn is a primary sub regional centre<sup>1</sup>, its principal catchment area (2011) embraces 128,000 shoppers from 238,000 residents<sup>2</sup> and its town centre is characterised by mid-market and value oriented retailers and charity shops<sup>3</sup>. Moreover, one can notice a high number of hairdressers/barber shops, card shops and hot food takeaways. However, in general the town centre includes a broad variety of shops to meet the general needs of the shoppers/residents.

Moreover, the town centre is adjacent to the bus station, and is easily accessible for pedestrians and also by car, due to various car parks surrounding the town centre. Only the railway station is not directly connected to the bus station, or the town centre, but is located within walking distance. Linkages have been improved recently (2015) through the King's Lynn Transport Interchange project. There is a perception that the town centre can appear like a "ghost town" after 17:30. Besides closed shops, the relatively poor street lighting, and the lack of bars, pubs or restaurants within the main town centre streets all combine to strengthen this perception. Besides McDonalds and Burger King very few premises are open until 11pm. Though, shops are open longer at locations out of the town centre (e.g. Sainsburys, Tesco, Argos, Next on the Hardwick Road).

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<sup>1</sup> Borough of King's Lynn and West Norfolk, Strategic Economic and Infrastructure Investment Plan, 2014

<sup>2</sup> FSP Draft Report for Murdock Group – King's Lynn, 2011, p. 11

<sup>3</sup> King's Lynn Quality Assessment 2006

## **Local Policy Background**

Policy CS03 of the 2011 Core Strategy stated that at least 20,000m<sup>2</sup> of additional retail floor space should be provided as an extension of the existing town centre. However, opposing this policy, smaller vacant units already exist within the town centre, but the available vacant units might not fulfil the requirements of today's retailers, due to size or outdated standards. Moreover, in some of the buildings within the town centre the floors above the shops, generally suitable for flats or office uses, are not accessible and therefore not in use.

Within the existing planning documents the following policies are relevant for retail issues:

### **Adopted CS (2011)**

#### **CS02 Settlement Hierarchy**

- King's Lynn -> sub regional centre
- Major planned growth of town centre uses in King's Lynn

#### **CS03 King's Lynn area**

- Provide at least 20,000m<sup>2</sup> of retail floor space as an extension of the existing town centre

#### **CS08 Sustainable Development**

- Protect and enhance the historic environment
- Exceptional place to live, work and visit

#### **CS10 Economy**

- Facilitate job growth
- Retail, tourism, leisure and cultural industries are key elements of the economic and social vibrancy of the borough. (Retail development -> Settlement Hierarchy policy)

#### **CS11 Transportation**

#### **CS13 Community & Culture**

- Being adaptable
- Being locally distinctive

**Adopted SADMP (2016):****Policy DM 10 – Retail Development**

- New retail uses will be expected to be located in these town centres unless an alternative location is demonstrated to be necessary

A continuation of the focus on town centres, in particular on King's Lynn's town centre, since it is a sub-regional centre, and was also indicated as a key centre for development and change within policy SS3 of the abolished East of England Plan, seems to be advisable. The nearest (sub-) centres to King's Lynn, as the sub-regional centre, are Downham Market (17km), Wisbech (19km), Hunstanton (22km), Swaffham (23km) and Holbeach (26km). Major competing centres are a considerable distance away – Peterborough (57km), Bury St Edmunds (66km), Norwich (70km) and Cambridge (73km).

**Recent Information**

Within the Planning and Retail assessment for Campbell's Meadow, based on information from the 2006 town centres study, the capacity for additional convenience goods and comparison goods floor space by the year 2021, based on the residual spending was estimated as an additional 1,155m<sup>2</sup> (convenience goods) and 43,264m<sup>2</sup> (comparison goods). For example the average retail floor space of an H&M store is 11,370ft<sup>2</sup> (1056m<sup>2</sup>). Though, within the Norwich Sub Region: Retail and Town Centres Study, it is stated, that forecasts (over more than 5 years) can only provide a broad indication of potential growth and need<sup>4</sup>. So the information about the capacity of the 2006 study referring to the year 2021 has to be considered carefully.

However, within the town centres study from 2006, it is clear that the retail composition based on the number of convenience goods units was underrepresented compared to the national average while comparison goods were above the national average. These findings might be based on a larger number of (smaller) units, rather than by the size of the total floor space.

Moreover, within the Retail and Leisure Impact Statement for the Hardwick Industrial Estate Extension it was stated, that "King's Lynn is the primary location for comparison shopping, particularly the Town Centre but also the established retail units along Hardwick Road."<sup>5</sup> Due to that King's Lynn could deal with or might even need additional retail floor space mainly in the town centre, but also at out of centre locations such as Hardwick Road. To specify the need for additional retail floor space quantitative and qualitative need assessments can be undertaken.

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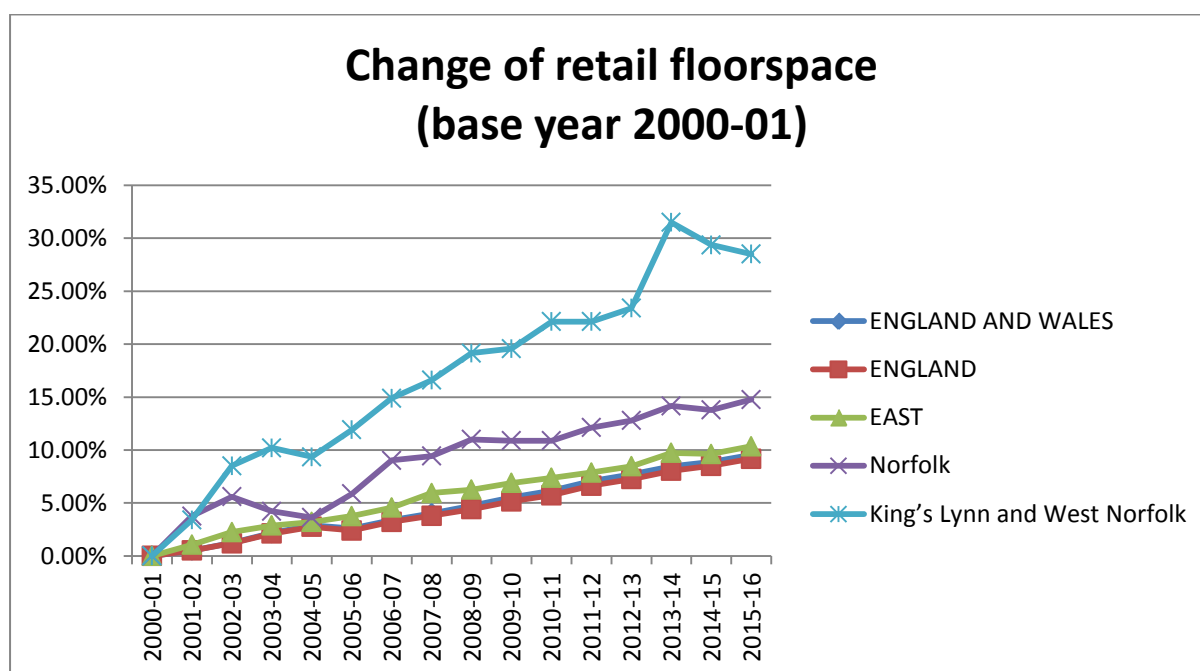
<sup>4</sup> Norwich Sub Region: Retail and Town Centres Study October 2007

<sup>5</sup> DPP, Retail and Leisure Impact Statement Morston Point Hardwick Industrial Estate Extension, 2014, p. 20

However, first of all the current retail floor space in King's Lynn is analysed.

## Analysis

Between 2000-01 and 2015-16 increasing floor spaces and decreasing numbers of retail properties can be seen within the Borough; a 28.51% increase of floor space and a decrease of 4.03% of retail properties (base year 2000/01), as one can see in the following chart. In total the retail floor space increased from 235,000m<sup>2</sup> to 302,000m<sup>2</sup>, while the number of properties decreased from 1,240 to 1,190.<sup>6</sup>



One characteristic of King's Lynn is the **decreasing number of units and retailers, while the required floor space for each retailer is increasing.**

In this case it might be harder to attract new retailers to the town centre since it is more difficult to meet their requirements, due to space restrictions for new developments and existing restrictions at vacant sites/units, than it is at out of town centre locations, such as Hardwick Road.

In addition, data broken down to King's Lynn and even the town centre itself would be useful for future statements about the town centre's need for additional floor space. Moreover, information about vacant units could be also helpful.

<sup>6</sup> Valuation Office Agency, Non-domestic rating: Business Floorspace England and Wales, Table FS2.1: Retail sector - number of rateable properties, 2016

Valuation Office Agency, Non-domestic rating: Business Floorspace England and Wales, Table FS2.3: Retail sector - total floorspace, 2016

A current (2010<sup>7</sup>) estimate of the retail floor space within King's Lynn town centre was provided by the Town Centre Manager, Alistair Cox: 1,040,700 sq. ft. (96,684 m<sup>2</sup>). The vacancy rate (September 2016) is 8%. The Town Centre Manager stated that the 2010 numbers are still valid<sup>8</sup>. By comparison, the current numbers, including vacant units, (2016) for the retail units within the King's Lynn BID list is 275 units with a total of 90,519.45m<sup>2</sup>. Due to that the **assumption of about 95,000m<sup>2</sup> for the town centre of King's Lynn seems realistic**. If one compares the total retail floor space numbers of the whole Borough, it is possible to see that the **town centre's retail floor space embraces about 1/3 of the Borough's total retail floor space**.

The data used in the previous chart, from the statistical release "Non-domestic rating: Business Floorspace England and Wales" provide retail floor space for the administrative area of King's Lynn and West Norfolk. This administrative area is made up of multiple Middle Layer Super Output Areas (MSOAs). On request the Valuation Office Agency provided the MSOAs for King's Lynn.

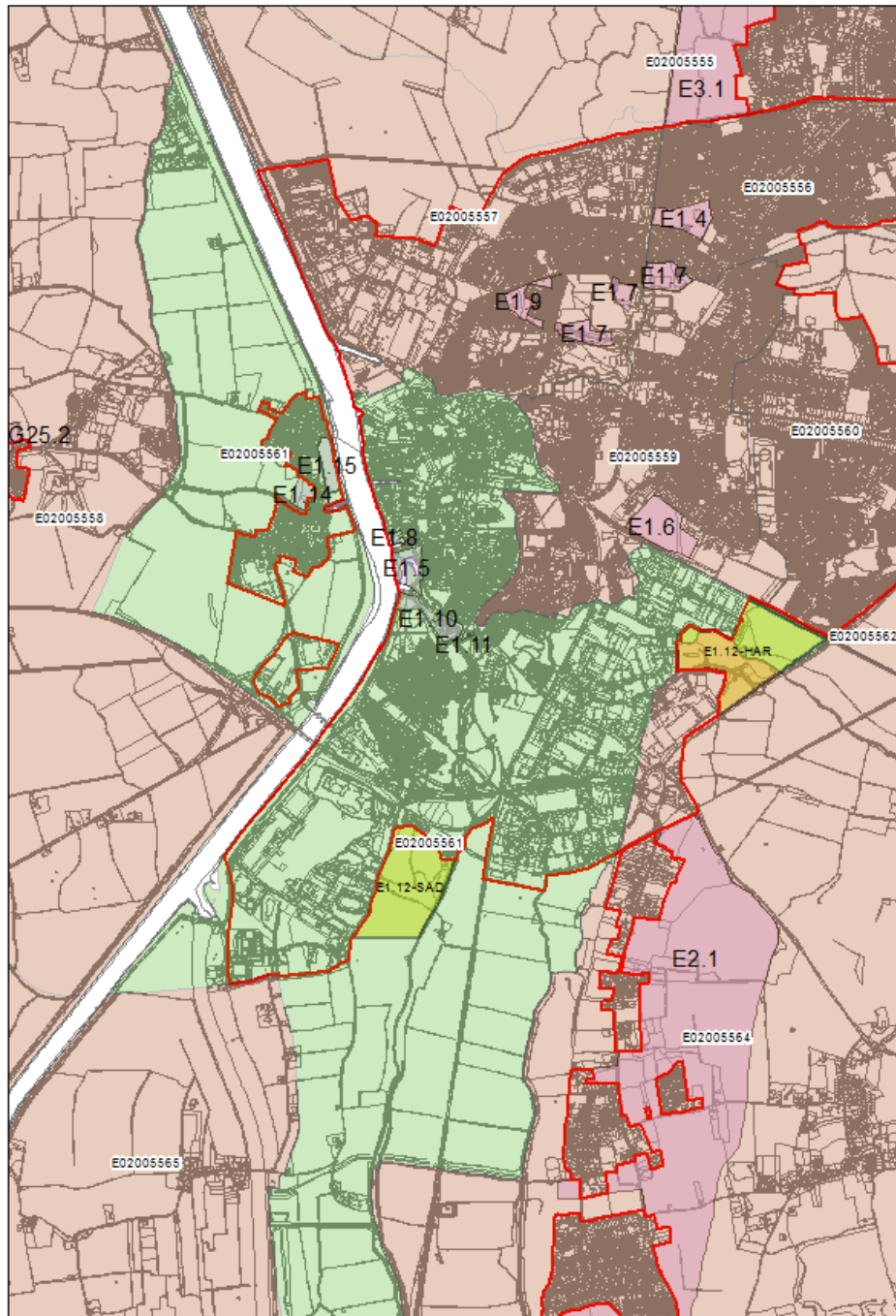
Within the following map one can see that the town centre and also out of town centre location at Hardwick Road is located within MSOA E02005561. Although, the MSOAs consist of Lower Layer Super Output Areas, the Valuation Office Agency advised to use the MSOAs, because below this level the statistics may be heavily impacted by their rounding and suppression policy to manage disclosure risk. The allocations for residential development and employment land within the MSOA are also displayed; it is noteworthy to point out that the two sites for employment land in King's Lynn are located in MSOA E02005561.

Outline planning permission was granted at one of these sites, the Hardwick Extension (E1.12 – HAR), in December 2012 (12/01490/OM) for an employment-led development providing a total of 72,300 sq. m. of office, industrial and storage space. Permission was subsequently granted for an alternative mix of uses (mixed use leisure, retail and employment) on part of the site (12.3 ha) in November 2015 (14/01114/OM). The main landowners at Hardwick, Morston Assets Ltd, entered administration in December 2014. The application was progressed by the administrators. The permission provides for a total of 5,481m<sup>2</sup> of A1 retail floorspace consisting of a DIY Store/Garden Centre (3716m<sup>2</sup>) and a discount supermarket (1,765m<sup>2</sup>); a drive through restaurant (A3/A5) 167m<sup>2</sup>; a family public house (A4) 372m<sup>2</sup>; and a car showroom (sui generis) 2323m<sup>2</sup>. The total permitted retail floorspace excluding the car showroom is 6,020m<sup>2</sup>.

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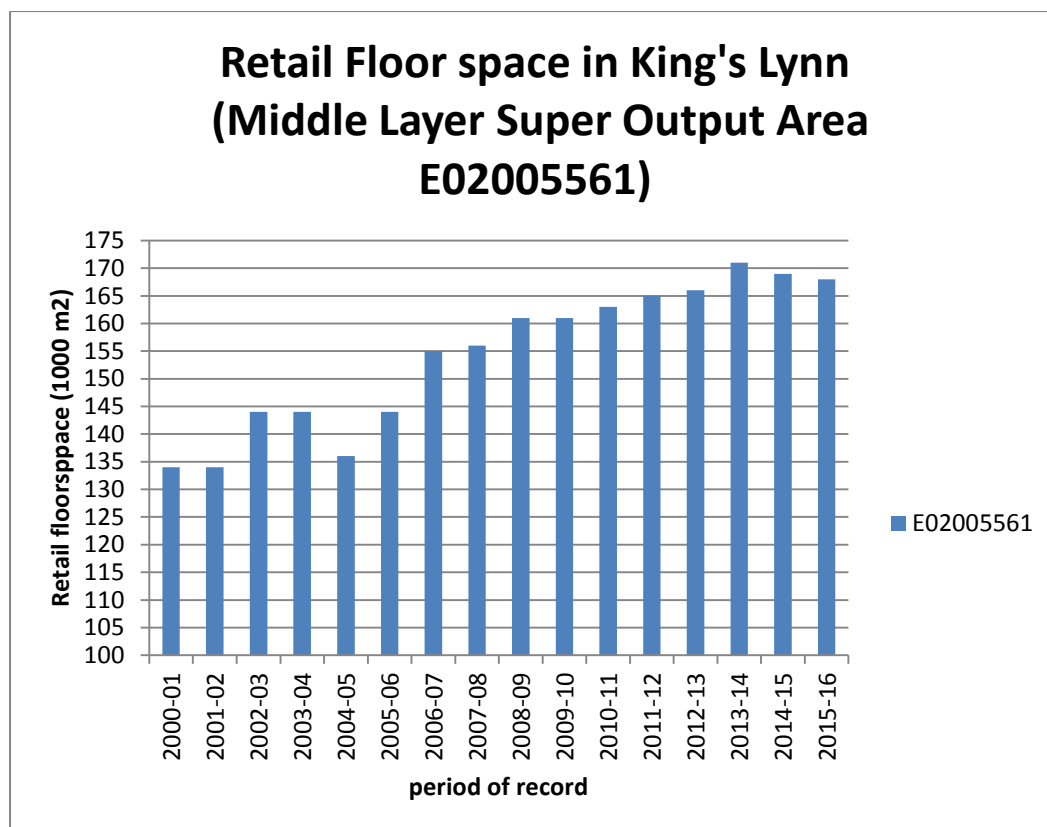
<sup>7</sup> GOAD, Goad Category Report King's Lynn, 2010, p. 9

<sup>8</sup> Alistair Cox, 2016



**Figure 1: King's Lynn MSOAs and Allocations**

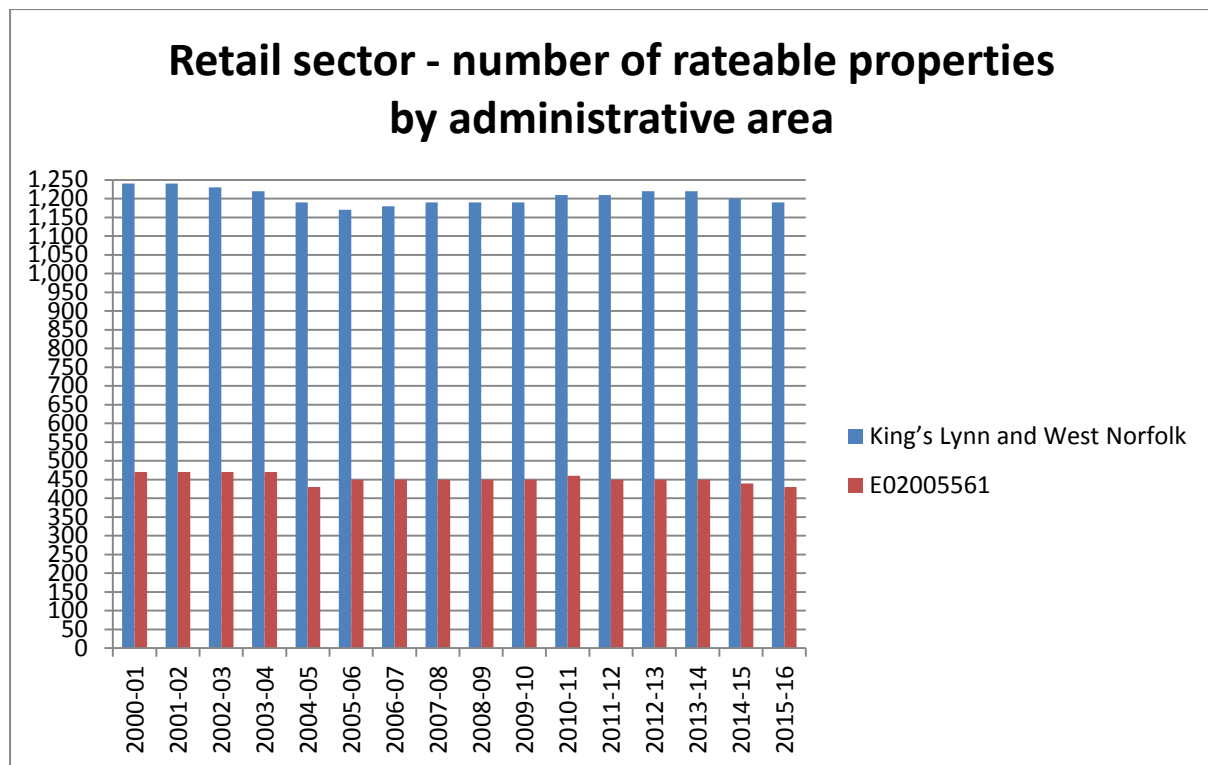
The following chart shows that between 2000/01 and 2015/16 the retail floor space increased from 134,000m<sup>2</sup> to 168,000m<sup>2</sup> in this MSOA. However, since 2010/11, when the Core Strategy was adopted, the retail floor space in this MSOA increased from 163,000m<sup>2</sup> to 171,000m<sup>2</sup> in 2013/14 and decreased afterwards to 168,000m<sup>2</sup> in 2015/16.



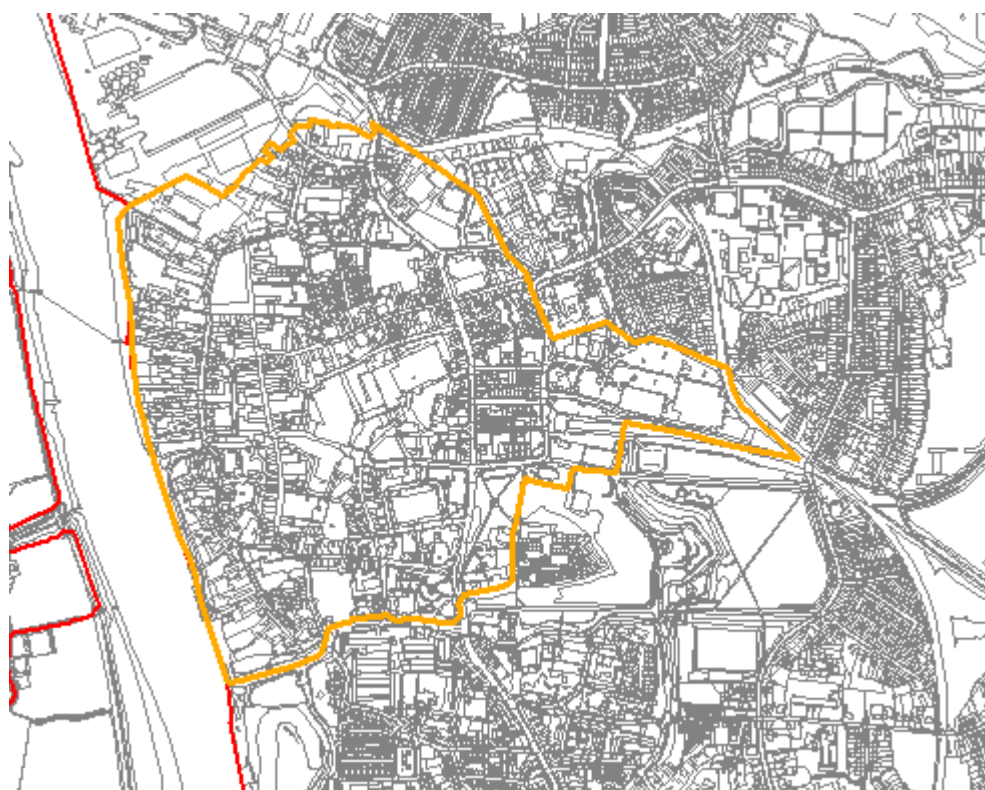
This shows that the additional required 20,000m<sup>2</sup> of retail floor space within the town centre until 2026, has not been taken up yet. In this sense if the additional 5,000m<sup>2</sup> within this MSOA, had been created in the town centre the shortfall at that time was 1,667m<sup>2</sup> at a steady development. However, since the MSOA covers a relatively large area, it is not possible to state where exactly within this area additional retail floor space has been created, but in general the assumption that **the creation of 20,000m<sup>2</sup> of additional retail floor space in the town centre is currently taking place at a steady pace can be refuted.**

As mentioned above the number of retail units is decreasing in the whole Borough, this was also confirmed within the numbers for MSOA E02005561; since 2010/11 there are 30 units less in this area (430 in 2015/16). With regard to the numbers of retail units - 2000/01 to 2015/16 the number of properties in King's Lynn decreased from 1240 to 1190 in the whole Borough and within MSOA E02005561 from 470 to 430 properties - are displayed in the following chart.





As it seems as if the creation of the required additional retail floor space seems to take place only to a limited extent, one might ask the questions: **can growth be accommodated in the existing centre or is an extension to the primary shopping area/town centre boundary possible and/or useful?**



**Figure 2: King's Lynn Town Centre Boundary**

## Conclusions

Retail applications should continue to be accompanied by quantitative and qualitative retail need assessments to assess their impact and the need for additional retail floor space in line with national policy guidance in the NPPF and PPG (see Appendix 1).

## Retail impact

The PPG advises that the following steps should be taken in [applying the impact test](#):

- establish the state of existing centres and the nature of current shopping patterns (base year);
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur;
- examine the 'no development' scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
- assess the proposal's turnover and trade draw\* (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw);
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact);
- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues;
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres.

Detailed quantitative and qualitative assessments could help, before concrete policy changes take place, since in general a town centre should be a thriving, vibrant, attractive place, including mixed use development and a mixed use economy. In that sense it is important that besides additional floor space creation and by this means retail improvements are proposed, but also other cultural or leisure facilities should be improved or provided within the town centre, to up values and tackle current deficits. However, the general cultural or leisure facilities provided in the town centre of King's Lynn are quite varied, but especially within the High Street a better mix of shops and restaurants/bars/pubs might be advisable, since after the shops are closed, the town centre is quite dark and empty.

If one looks at the previously mentioned capacity of 1,155m<sup>2</sup> (convenience goods) and 43,264m<sup>2</sup> (comparison goods) in the year 2021, and the statement, that the

current floor space of the town centre is more or less the same as in 2010 (about 95,000m<sup>2</sup>) the assumption that the continuation of the policy of an additional 20,000m<sup>2</sup> in the town centre for the period until 2036, with a target of 115,000m<sup>2</sup> at 2036, might be appropriate. But besides this policy it might be advisable if additional policies, e.g. supporting the Town Centre Partnership and BID; aiming for a qualitative improvement of the town centre; and fighting current deficiencies, are added. In this connection, redevelopment of vacant units and sites to house new development should be a focus. For example reuse of the former Beales department store in a short timeframe would be desirable. But also reuse of smaller units, with strategies for (unused) upper floors should be driven forward.

## **Recommendations**

### **Key Aspects for Plan revision**

- Seek quality improvements of the town centre offer e.g. events such as Christmas markets, etc., mixture of leisure, retail, cultural offers, improvement of public space and urban design (coordinated and partly financed by BID, LEP?). Explore possibilities to compete with online shopping/out of centre shops by means they cannot provide!
- Allow flexibility for future uses/development (due to possible retail changes, shopping habits, etc.) within layout of units, etc.
- Involve the relevant stakeholders (BID, Town Centre Partnership, etc.) within relevant decision making.
- Provide for up to 20,000m<sup>2</sup> of additional retail floor space in King's Lynn town centre (mostly comparison goods) until 2036 leading to a maximum target of 115,000m<sup>2</sup> (95,000m<sup>2</sup> existing + 20,000m<sup>2</sup> proposed).
- Support the reuse and improvement of vacant units within the town centre.
- Encourage improved cooperation between Town Centre and out of town centre retailers (e.g. Hardwick Road).

## **Appendix 1 - National Planning Policy**

### **NPPF 2012**

#### **2. Ensuring the vitality of town centres**

23. Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality
- define a network and hierarchy of centres that is resilient to anticipated future economic changes
- define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations
- promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites

- where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

24. Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

25. This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

26. When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq. m). This should include assessment of: \* the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal \* the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made

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

## PPG (2014)

### Ensuring the vitality of town centres

#### What does the National Planning Policy Framework say about planning for town centres?

Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.

Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre.

This positive approach should include seeking to improve the quality of parking in town centres (in line with the National Planning Policy Framework) and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers.

The National Planning Policy Framework sets out 2 key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions and may be useful in informing the preparation of Local Plans.

The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test. The impact test determines whether there would be likely significant adverse impacts of locating main town centre development outside of existing town centres (and therefore whether the proposal should be refused in line with policy). It applies only above a floorspace threshold as set out in [paragraph 26](#) of the National Planning Policy Framework.

See related policy:

- [Annex 2: Glossary – Main town centre uses](#)

Paragraph: 001 Reference ID: 2b-001-20140306

Revision date: 06 03 2014

**Why is it important to have a strategic vision for town centres?**

A positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits. Once adopted a [Local Plan](#), including any town centre policy that it contains, will be the starting point for any decisions on individual developments. Local planning authorities should work with the private sector, Portas Pilot organisations, town teams, neighbourhood planning groups, town centre management organisations and other relevant groups when developing such strategies. Non-planning guidance produced by other government departments and the sector may be useful in producing such a strategy.

Paragraph: 002 Reference ID: 2b-002-20140306

Revision date: 06 03 2014

**What should a town centre strategy contain?**

Any strategy should be based on evidence of the [current state of town centres](#) and opportunities to meet development needs and support their viability and vitality. Strategies should answer the following questions:

- what is the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period? This will involve auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and different types of development. This assessment should cover a 3 to 5 year period, but should also take the lifetime of the Local Plan into account and be regularly reviewed
- what is the vision for the future of each town centre? This should consider what the most appropriate mix of uses would be to enhance overall vitality and viability
- can the town centre accommodate the scale of assessed need for main town centre uses? This should include considering expanding centres, or development opportunities to enable new development or redevelop existing under-utilised space. It should involve evaluating different policy options (for example expanding the market share of a particular centre) or the implications of wider policy such as infrastructure delivery and demographic or economic change
- in what timeframe should new retail floorspace be provided?
- what complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how can these be planned and delivered?
- how can parking provision be enhanced and both parking charges and enforcement be made proportionate, in order to encourage town centre vitality?

Strategies should identify changes in the hierarchy of town centres, including where a town centre is in decline. In these cases, strategies should seek to manage decline positively to encourage economic activity and achieve an appropriate mix of uses commensurate with a realistic future for that town centre.

Paragraph: 003 Reference ID: 2b-003-20140306

Revision date: 06 03 2014

### **How should market signals be addressed when planning for town centres?**

Local planning authorities should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.

Paragraph: 004 Reference ID: 2b-004-20140306

Revision date: 06 03 2014

### **Which indicators should be used to determine the health of town centres?**

The following indicators, and their changes over time, are relevant in assessing the health of town centres:

- diversity of uses
- proportion of vacant street level property
- commercial yields on non-domestic property
- customers' views and behaviour
- retailer representation and intentions to change representation
- commercial rents
- pedestrian flows
- accessibility
- perception of safety and occurrence of crime
- state of town centre environmental quality

Not all successful town centre regeneration projects have been retail led or involved significant new development. Improvements to the public realm, transport (including parking) and accessibility as well as other measures promoted through partnership can also play important roles.

Any strategy should identify relevant sites, actions and timescales, and be articulated clearly in the Local Plan, where it can be considered by local people and investors. It should be regularly reviewed, assessing the changing role and function of different parts of the town centre over time.

Paragraph: 005 Reference ID: 2b-005-20140306

Revision date: 06 03 2014



**What if the required development cannot be accommodated in the town centre?**

It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise, as set out in [paragraph 26](#) of the National Planning Policy Framework.

Paragraph: 006 Reference ID: 2b-006-20140306

Revision date: 06 03 2014

**What should local planning authorities consider when planning for tourism?**

Please see the World Tourism Organization's [definition of tourism](#).

Tourism is extremely diverse and covers all activities of visitors. Local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism. When planning for tourism, local planning authorities should:

- consider the specific needs of the tourist industry, including particular locational or operational requirements;
- engage with representatives of the tourism industry;
- examine the broader social, economic, and environmental impacts of tourism;
- analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and
- have regard to non-planning guidance produced by other government departments.

Local planning authorities may also want to consider guidance and best practice produced by the tourism sector. Further guidance on tourism can be found on the [Visit England website](#).

Paragraph: 007 Reference ID: 2b-007-20140306

Revision date: 06 03 2014

**What is the sequential test?**

The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected

to the town centre. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.

See related policy:

- [Annex 2: Glossary – Edge of centre](#)

Paragraph: 008 Reference ID: 2b-008-20140306

Revision date: 06 03 2014

### **How should the sequential approach be used in plan-making?**

In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected.

The checklist below sets out the matters that should be considered when taking a sequential approach to plan-making:

- Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses
- Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed
- If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on?

Local Plans should contain policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan.

Paragraph: 009 Reference ID: 2b-009-20140306

Revision date: 06 03 2014

### **How should the sequential test be used in decision-taking?**

It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority should support the applicant in undertaking the sequential test, including sharing any relevant

information. The application of the test should be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites should be discussed between the developer and local planning authority at the earliest opportunity.

The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.
- is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
- if there are no suitable sequentially preferable locations, the sequential test is passed.

In line with [paragraph 26](#) of the National Planning Policy Framework, where a proposal fails to satisfy the sequential test, it should be refused. Compliance with the sequential and impact tests does not guarantee that permission is granted – local planning authorities will have to consider all material considerations in reaching a decision.

Paragraph: 010 Reference ID: 2b-010-20140306

Revision date: 06 03 2014

### **How should locational requirements be considered in the sequential test?**

Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification.

Paragraph: 011 Reference ID: 2b-011-20140306

Revision date: 06 03 2014

### **How should viability be promoted?**

The sequential test seeks to deliver the government's 'town centre first' policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere local planning authorities need to be realistic and flexible in terms of their expectations.

Paragraph: 012 Reference ID: 2b-012-20140306

Revision date: 06 03 2014

### **What is the impact test?**

The purpose of the test is to ensure that the impact over time (up to 5 years (10 for major schemes)) of certain out of centre and edge of centre proposals on existing town centres is not significantly adverse. The test relates to retail, office and leisure development (not all main town centre uses) which are not in accordance with an up to date Local Plan and outside of existing town centres. It is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas.

Paragraph: 013 Reference ID: 2b-013-20140306

Revision date: 06 03 2014

### **How should the impact test be used in plan-making?**

If the Local Plan is based on meeting the assessed need for town centre uses in accordance with the sequential approach, issues of adverse impact should not arise. The impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centres.

Paragraph: 014 Reference ID: 2b-014-20140306

Revision date: 06 03 2014

### **How should the impact test be used in decision-taking?**

It is for the applicant to demonstrate compliance with the impact test in support of relevant applications. Failure to undertake an impact test could in itself constitute a reason for refusing permission.

The impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Ideally, applicants and local planning authorities should seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted.

Paragraph: 015 Reference ID: 2b-015-20140306

Revision date: 06 03 2014

## When should the impact test be used?

The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace\* unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the:

- scale of proposals relative to town centres
- the existing viability and vitality of town centres
- cumulative effects of recent developments
- whether local town centres are vulnerable
- likely effects of development on any town centre strategy
- impact on any other planned investment

As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities. Conditions may be attached to appropriately control the impact of a [particular use](#).

Where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment. Key considerations will include:

- the policy status of the investment (i.e. whether it is outlined in the Development Plan)
- the progress made towards securing the investment (for example if contracts are established)
- the extent to which an application is likely to undermine planned developments or investments based on the effects on current/ forecast turnovers, operator demand and investor confidence

\* “ Gross retail floorspace (or gross external area) is the total built floor area measured externally which is occupied exclusively by a retailer or retailers, excluding open areas used for the storage, display or sale of goods.

Paragraph: 016 Reference ID: 2b-016-20140306

Revision date: 06 03 2014

## Is there a checklist for applying the impact test?

The following steps should be taken in [applying the impact test](#)

- establish the state of existing centres and the nature of current shopping patterns (base year)
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur

- examine the 'no development' scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
- assess the proposal's turnover and trade draw\* (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw)
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact)
- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres

A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. For example in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.

Where evidence shows that there would be no likely significant impact on a town centre from an edge of centre or out of centre proposal, the local planning authority must then consider all other material considerations in determining the application, as it would for any other development.

The design year for impact testing should be selected to represent the year when the proposal has achieved a 'mature' trading pattern. This is conventionally taken as the second full calendar year of trading after opening of each phase of a new retail development, but it may take longer for some developments to become established.

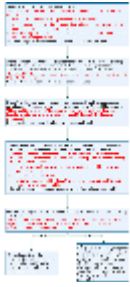
\* "Trade draw is the proportion of trade that a development is likely to receive from customers within and outside its catchment area. It is likely that trade draw will relate to a certain geographic area (i.e. the distance people are likely to travel) and for a particular market segment (e.g. convenience retail). The best way of assessing trade draw where new development is proposed is to look at existing proxies of that type of development in other areas.

Paragraph: 017 Reference ID: 2b-017-20140306

Revision date: 06 03 2014

### **Impact test: decision-taking**

This diagram sets out some of the key steps which should be taken when carrying out an impact test in decision-taking, but does not outline the process in its entirety.



[Impact test: decision-taking](#)

PDF, 898KB, 1 page

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Paragraph: 018 Reference ID: 2b-018-20140306