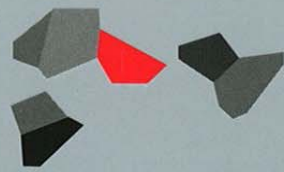


Report to Cherwell District Council

Application 15/00831/F

Land at Kraft Foods, Southam Road,
Banbury



August 2015

C10251



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1.0 Introduction

1.1 This report has been prepared by DPDS for Cherwell District Council and considers the Retail Impact Assessment by PBA and the Sequential Test Assessment by Framptons both dated May 2015. We have also had regard to the application forms, plans design and access statement and objections by Turley dated 16th June 2015. These were made on behalf of Aberdeen Asset Management which has substantial interests in the town centre including the Castle Quay Shopping Centre. We have visited the site, the town centre, and the sites identified in the sequential test statement.

1.2 The description of development is:-

Proposed development of a new Waitrose food store with car parking and access arrangement onto Southam Road. Demolition of existing building.

1.3 The proposal is for a foodstore with associated access and parking on 1.58 ha of largely unused land at the Mondelez (formerly Kraft) works on Southam Rd. Banbury. The application is supported by a letter from Mondelez dated 1st April 2015 which states that a large part of the receipts from any sale would be reinvested in improvements to the manufacturing site. This matter is expanded upon in the planning statement. These economic benefits are disputed by Turley which also objects to the loss of employment land, but our instructions do not cover this consideration except in the most general terms.

1.4 The store is located at the southern end of the site, with the building facing the car park and customer vehicular access to the north. The building has a gross floorspace of 3596 sq. m which PBA estimates would provide 2697 sq. m of net sales floorspace. Two scenarios are examined - with 15% and 30% comparison goods floorspace. Servicing would be from a separate access to the south of the building. A pedestrian access to the store would be provided from Southam Road direct to the front of the building. The distance to the primary shopping frontage from this store is some 750-800m, although the distance to the defined, extended town centre in the local plan is given as 550m. The walk is along a busy main road with mainly a mix of commercial uses on the eastern side and offices and the cemetery on the western side. It is not an attractive walk and few people would make linked trips between the town centre and proposed food store by foot. Bus stops are located on Southam Rd at the northern end of the site. The site is, in planning terms definitely out-of-centre.

- 1.5 There are a number of retail outlets on the eastern side of Southam Rd including Dunelm, Homebase and B&Q. Further to the north, on the northern side of Ruscote Avenue there is a Tesco Extra store and the Banbury Cross Retail Park, with Boots, Next, Argos and many other outlets. There is an Aldi store located on Ruscote Avenue.
- 1.6 The Banbury Gateway development is under construction on Wildmere Rd, near the M40 junction to the north of the site and is due to open this year, (Application number 11/01870/F). The development would have a total floor area of 26,503 sq. m and would include an anchor store (unit 11) with a ground floor area of 4,647 sq. m and a secondary store with garden centre (unit 2) with a ground floor area of 2,790 sq. m. The remainder of the retail units would have ground floor areas ranging from 465 sq. m to 929 sq. m. Key anchors include M&S, Next and Primark. Some of the sites considered in the sequential test for this proposal are also considered in relation to current application. However, the proposal is obviously very different and the application was determined under the PPS4 regime rather than the NPPF. The impact on the town centre is as yet unknown.
- 1.7 There is also a resolution to permit the redevelopment of land at the Spiceball site subject to the signing of a S106 agreement (13/01601/OUT). The site is immediately north of the Castle Quay Shopping Centre (on the other side of the canal) and its North Car Park. The proposal is a mixed use development including a foodstore, hotel and cinema and restaurants and cafes. The site is included in the revised town centre boundary in the newly adopted Local Plan and is an important material consideration in the sequential and impact tests for the current application.
- 1.8 The planning history of the application site indicates that planning permission for a hotel and restaurant was refused in 2011 (10/01347/F) and an application for foodstore in 2012 has been withdrawn. The reason for refusal of the hotel and restaurant development was that there were sequentially preferable sites available, that the development would adversely affect investment in the town centre and the centre's vitality and viability. Although still for a main town centre use, the site requirements in relation to the sequential test and the potential impacts of the retail development now proposed would be different from the hotel and restaurant and would provide little guidance to the current application.

2.0 Planning Policy

The National Planning Policy Framework

- 2.1 The National Planning Policy Framework establishes a presumption in favour of sustainable development, and for decision taking this is defined as granting planning permission for developments which accord with the development plan, and granting planning permission where the development plan policies are absent, silent, or the relevant policies are out-of-date unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies of the framework as a whole or specific policies in the in the Framework indicate development should be restricted.
- 2.2 In relation to the specific policies, Para 23 of the NPPF sets out the objective to ensure the vitality of town centres. Para 24 sets out the sequential test in relation to main town centre uses and para 26, the requirement for formal impact assessment for proposals above 2,500 sq. m or any local threshold. The proposal is above the threshold for an impact assessment. Para 27 states that where an application fails either the sequential or impact tests planning permission should be refused.
- 2.3 The key planning policies specifically with regard to retail development in the NPPF are therefore the sequential test and the two parts of the impact test – the impact on investment and the impact on the vitality and viability of the centre. While this policy is substantially the same as the tests in PPS4, the details about how these are to be implemented have changed and we will refer to these changes in applying the tests to the application proposal.

Development Plan Policies

- 2.4 The Cherwell Local Plan 2006 – 2031 was adopted by the Council on 20th July 2015. Appendix 7 identifies which policies have been replaced and which retained. In relation to retail policies all the relevant retail policies have been replaced by policy SLE2 and Banbury 7. There is therefore no need for us to consider the policies from the earlier adopted Cherwell Local Plan 1996 or the non-statutory Local Plan 2011.
- 2.5 Policy SLE 2 Securing Dynamic Town Centres states that retail and other main town centre uses will be directed towards the town centres of Banbury and Bicester and the village centre of Kidlington.

It states that the Council will apply the sequential test as set out in the NPPF and notes that applications will be considered against this test and whether they would have a significant adverse impact on any of the factors in the NPPF. It sets local thresholds for impact assessments (over 2000 sq. m at Banbury) and proposals are required to comply with policies SLE4 (transport) and ESD 15 (heritage conservation). The policy supports the provision of new local centres within the strategic housing allocations.

- 2.6 The importance of focusing development of main town centres uses at Banbury in the town centre is identified in the text. (Paras C.113 – C.130). The need to improve the appearance and vitality of the town centre (outside the Castle Quay Shopping Centre) is identified and it is stated that the Plan seeks to ensure that the town centre remains the primary focus for new development, particularly retail uses together with other appropriate main town centre uses such as employment, community, leisure, and residential development.
- 2.7 Policy Banbury 7 states that shopping, leisure and other 'Main Town Centre Uses' will be supported within the boundary of Banbury town centre. The proposals map identifies a town centre shopping area and a town centre commercial around the edges of the shopping area. It seeks to control non-A1 and A3 uses in the primary shopping frontage, to encourage active frontages at ground floor level in the primary retail frontages and to restrict A1 uses in the Town Centre commercial area. The proposals map shows an extended town centre shopping area which includes sites covered by policies Banbury 8 (Bolton Rd) and Banbury 9 (the Spiceball site) and an area of search for a town centre extension within the Banbury Canalside site (policy Banbury 1). We will consider these sites in more detail in relation to the sequential test. The policy also notes that proposals will be considered against policies SLE2, ESD 10 (biodiversity) and ESD 15 (heritage conservation).
- 2.8 In summary the Local Plan identifies the sequential and impact tests as key considerations in assessing proposals for retail and other main town centres uses identifies a town centre shopping centre boundary extended to cover two potential development sites.

3.0 Sequential Assessment

Preliminaries

- 3.1 The sequential approach is well understood. Local Planning Authorities should require applications for main town centre uses to be located in town centre, then in edge of centre sites and only if suitable sites are not available should out of centre sites be considered. When considering edge-of-centre and out-of-centre sites preference should be given to accessible sites which are well connected to the town centre. Where it is demonstrated that there are no town centre or edge-of-centre sites available, applicants and local authorities are expected to have shown flexibility on issues such as scale and format.
- 3.2 The Dundee judgment (*Tesco Stores Limited v Dundee City Council* UKSC 13 [2012]) established that suitability of sites is their suitability for the application proposal. The judgment went on to note that the applicant was, however, required to show flexibility. The Rushden Lakes decision by the Secretary of State (APP/G2815/V/12/2190175) notes that there is no requirement in the NPPF for applicants to disaggregate their proposal and that the NPPF requires alternative sites to be available – rather than, in PPS4, available in a reasonable period of time. This has been taken by some to mean that alternative sites have to be available now, but Inspectors have considered this as unduly restrictive. While the Rushden Lakes decision does have to be seen in the context of the particular proposal, we consider that weight does have to be accorded the then Secretary of States views.
- 3.3 In relation to this application, disaggregation is unlikely to be issue. It is for a single foodstore of 3596 sq. m gross. In line with the approach set out in the Dundee judgment, we consider that alternative sites should be capable of accommodating a foodstore of broadly similar size, but the applicant must demonstrate a degree of flexibility. There is little guidance on how much flexibility applicants should show, so it is up to the local planning authority to judge whether the flexibility is sufficient or not. It should exercise this judgement reasonably if its decision is not to be overturned at appeal or by judicial review. In this case, we consider that it would be unreasonable to require the retailer to operate from more than one unit – but some flexibility should be expected in relation to the amount of floorspace and parking and some operational characteristics. This matter is likely to be a key consideration in relation to alternative sites and whether the sequential test is passed. .We will examine it in relation to the applicant’s comments on individual sites.

- 3.4 Framptons assesses sites according to their availability, suitability and viability. Viability is not referred to in the NPPF as one of the assessment criteria. Viability in PPS4 was, in our view, intended to refer to the viability of development not to the viability of the trading location for particular retailers, which we regard as pertaining to the suitability of the site. In this sense it remains a consideration, which, particularly post Dundee, may be relevant to some proposals.
- 3.5 The applicant has considered only opportunities in Banbury and has not included other towns or local centres in the search. We regard this as reasonable. There are no other centres which would serve the same catchment area. Sites or units on the edge of the study area, or in other towns such as Bicester or Chipping Norton would clearly not do so and are therefore unsuitable. .

The Opportunities and Sites

Vacant Units

- 3.6 The applicant has not considered vacant units in the town centre. This is still necessary (post Dundee) to comply with the sequential test but any vacant unit would to be able to accommodate a foodstore of broadly the same size. From our visit to the town centre and searches on the internet, we are satisfied that there are no suitable vacant units in the town centre. From the information available from the internet, there are three larger units available in Banbury – two on Banbury Cross retail park of 465 sq. m (5000sq ft.) and 697 sq. m (7,500 sq. ft) and one unit on Southam Road of 1395 sq. m. These are neither large enough nor sequentially preferable. The largest units available in the town centre are about 250 sq. m.

Site 1 – Land at White Lion Yard and Church Walk

- 3.7 This is a town centre site in predominantly retail use. The site area is given as 0.6ha and comprises the Lions Walk shopping arcade and lanes behind it, and some private car parking/servicing areas. It provides small retail units largely for independent traders. It has no policy designation (other than in the town centre) and has not been identified by the Council for redevelopment. The largest building on the site, which appears to be a former cinema is being refurbished at present and clearly would not accommodate a foodstore of the type proposed in the application.
- 3.8 Framptons concluded that because it was occupied by a number of commercial units with different owners and any form of comprehensive redevelopment would require extensive negotiations and

the site could not be considered available in the short to medium term. It also considered that it was unsuitable for a single large user because of the servicing requirements and site shape.

- 3.9 It is not clear how Framptons identified the site or defined the site boundaries in the absence of any policy designation. Although Framptons claims that the site is in many different ownerships there is little evidence of this provided. Nevertheless, although parts of the area are rather tired, it is difficult to see it forming any redevelopment site or being capable of accommodating a large floorplate user of any kind. We agree that the site is not suitable or available as a sequentially preferable alternative.

Site 2 Bolton Rd

- 3.10 The site area is given as 2 ha and it is on the edge of the town centre, identified in the Cherwell Local Plan as subject to policy Banbury 8 and included in the extended town centre shopping area. It is sequentially preferable to the application site. It is formed by the multi-storey car park, the Gala building, a vehicle maintenance business and several areas of private car parking. The Local Plan indicates that it is capable of providing some larger shop units suitable for modern retail operations, as well as around 200 new homes, a hotel and leisure facilities, with replacement car parking.
- 3.11 Framptons regards it as required to come forward as a comprehensive mixed development and as it is multiple ownership it is not available in the short to medium term. It considers the site as unsuitable because the local plan does not include large scale retail provision and it could not accommodate the range of uses suggested in policy as well as a foodstore. It is clear that Framptons assessment predates and does not give sufficient weight to the Local Plan 2006- 2013.
- 3.12 In our view this overstates the role of policy constraints in the sequential test. The purpose of the policy is to indicate acceptable uses, not to dictate the exact form of development. The largest part of the site in a single ownership is the multi-storey car park and this could accommodate a foodstore of about the size of the application proposal, albeit possibly reliant on other parking. We therefore do not agree that the multiple ownership would necessarily make the development for a foodstore long term.
- 3.13 The multi-storey car park is in Council ownership and could be brought forward independently of the rest of the site. However, we understand that no steps have been taken by the Council to bring

the site forward so far and it would be difficult to persuade an Inspector in an appeal that the site is likely to be made available for a foodstore within a reasonable period of time, if at all. In our view the availability of the site and the time-scale at present are too uncertain to consider the site as available in sequential test terms.

Site 3 Calthorpe St

- 3.14 The site was identified as a possible development site in the 2012 Retail Study and the earlier local plan, but not in the Local Plan 2006 -2031. The site area is given as 2ha by Framptons and is primarily in use for car parking, a substantial proportion of which serves the retailers trading from the former Sainsbury building. The site is bisected by Calthorpe Street which would severely constrain development of large floorplate buildings. Calthorpe St serves the town centre and the servicing areas the rear of the High St. and the difficulty of finding acceptable alternatives makes its closure unlikely in the short to medium term.
- 3.14 Framptons rejects the site because there appears to be no proposals for the development of the site and its short to medium term availability is therefore unlikely. While we do not agree that there has necessarily to be active development proposals for a site to be available, in the context of this site, we agree that large scale redevelopment capable of accommodating a foodstore is unlikely within the short to medium term. The lack of a policy in the recent local plan is a particular weakness in promoting the site as a sequentially preferable alternative.

Site 4 Land at Christchurch Court, Crown House and George St

- 3.16 These are three separate sites in three ownerships and there is no reason why they should be grouped together. The land at Christchurch Court is a car park which serves the adjacent Matalan store and the town centre more generally. The site at George Street comprises small private car parks to premises on the High St. Crown House is a derelict office building which shares a short boundary with Christchurch Court.
- 3.17 Framptons argues that the three sites are in separate ownership and any development potential relies on a significant land assembly programme and concludes that the site's coming forward in the short to medium term is extremely unlikely. It also concludes that each site is unsuitable. Crown House and the George Street sites are considered unsuitable because they are too small; Christchurch Court because it provides parking for Matalan.

- 3.18 Since there is no reason why they should be linked together, their availability cannot be assessed on the basis of the need for land assembly. In our view, the only site worth considering at all is the Christchurch Court site. The George Street site is too small and would not contribute to accommodating a foodstore. The Christchurch site is in active use and there is no indication that its development is being contemplated. Crown House therefore has to be considered on its own and is obviously too small. It will no doubt be brought into some use, but demolition and redevelopment does not look an attractive proposition given the building structure on site.
- 3.19 We conclude that there are no opportunities to accommodate a foodstore in the area between George Street and High Street.

Sites 5 and 6 Banbury Canalside

- 3.20 Site 6 is the large area of mixed commercial uses to the west and south of the station and to the east of Cherwell St. It is subject to policy Banbury 1 of the Local Plan. Framptons rejects it as a potential site for a foodstore because of the Council's aspirations for the site to be developed comprehensively with a mixed use scheme and principally residential led. It claims that maximum size of retail units of 2,500 sq. m proposed in the 2009 SPD to rule it out as unsuitable.
- 3.21 Site 5 is the part of the larger site which has been identified as an area of search for a town centre extension. The smaller part of the site identified (Site 5b) is separated from the main part of site by Bridge St and is manifestly too small. Framptons rules out site 5a on the basis that the vast majority of units are occupied and that the site is in private ownership. It is not explained why private ownership should rule the site out.
- 3.22 The area subject to policy Banbury 1 is clearly a large scale redevelopment opportunity. Framptons does not identify what the ownerships are in the area and really provides little information at all. The site is not likely to be redeveloped comprehensively in the current economic climate and while some co-ordination of infrastructure provision may be needed to bring development forward, the site could, and is in fact likely to be, developed piecemeal. However, we consider that in the absence of any development proposals in the area at present, the existing uses and the number of ownerships or leases in the area of search for a town centre extension (Sites 5a and b) would rule out the land's availability in an appropriate timescale for the sequential test.

Site 7 Spiceball

- 3.23 The site is included in the town centre shopping area in the Local Plan and identified as subject to policy Banbury 9 which identifies suitable uses as retail (including small A1, A3), hotel (C1), leisure (D2) and car parking. As noted in para 1.7 above, there is a resolution to permit a mixed use scheme which includes a foodstore of 2322 sq. m net sales (Application No 13/01601/OUT). Progress is being made on the outstanding matters and we understand that a S106 agreement is expected to be agreed shortly.
- 3.24 Framptons accepts that the site is available but considers it unsuitable for a Waitrose store and unviable. The reasons given are
1. The size of the proposed foodstore at 25,000 sq. ft. net sales is not large enough to enable Waitrose to compete against existing food retailers in Banbury.
 2. The store configuration does not meet Waitrose's model layout; it is too long and thin and does not allow sufficient aisle width and/or an acceptable store layout.
 3. The vertical circulation (goods lifts, customer lifts and escalators/travellators) sits within the sales area, further reducing the available selling space and compromising retail layout.
 4. The multi-level car parking proposed is not of an acceptable layout and is not suitable for Waitrose customers. Multi-level parking is a disincentive as customers find it inconvenient and more difficult to navigate, and so reduces sales and viability.
 5. The overall scheme is a complex – multi level mixed use redevelopment of a constrained town centre site that includes a hotel, cinema, restaurants, bars and cafes. Customers are likely to find themselves competing for parking with users of the adjacent leisure centre, as well as users of the other facilities on the site.
- 3.25 This is supplemented by the letter from Waitrose dated 19th May 2015. This makes it clear that Waitrose did consider the proposal, but the timing of that consideration vis-à-vis negotiations on the Southam Road site is not clear. If they were concurrent, it is not surprising that in commercial terms Waitrose preferred the Southam Road site. It also seems clear in the context of its investment policy and the funds available for new stores, that Waitrose is unlikely to take up the Spiceball option even if planning permission is refused on the Southam Rd site. That, however, is a

commercial decision for Waitrose; for the sequential test, the question is whether it is being sufficiently flexible.

- 3.26 Turley, on behalf of AAM, claim that Framptons' acceptance of the Spiceball site as sequentially preferable is sufficient to indicate a refusal of planning permission, but that omits an essential stage of assessment - that sites also have to be suitable and available. Turley then goes on to comment that Waitrose's position – that it will not go to the Spiceball site - predetermines the outcome of the exercise and that it is not an objective or factual assessment of the site. Turley then goes on to note that

“The claim by a specific commercial interest (in this case Waitrose) that a particular in-centre trading location is not viable, particularly where this is asserted rather than proven through an ‘open book’ viability assessment, is not a reason to circumvent the sequential test”.

This makes two points – first that suitability has to be considered in wider terms than a single specific retailer and second that any such claim must be supported by evidence. Although not entirely clear, this appears to be aimed at the claim by Waitrose that the Spiceball site is not a viable trading location based on weekly sales forecasts, but it is of more general relevance.

- 3.27 In our view there is some weight in these points. In particular, we do not consider that the Council can give weight to the viability of the Spiceball site in weekly sales terms without supporting evidence. While we appreciate the difficulty of making such assessments public, the applicant would need to find a way of supporting the claim with evidence. On the face of it, it is not obvious why the trading performance of the two sites should be expected to be so different.

- 3.28 Turley goes on to state that differences between the Spiceball and Southam Roads sites as trading locations are marginal, before considering each of the objections to the Spiceball proposal raised by Framptons.

Store Size

- 3.29 In relation to store size, Turley claims that the difference between stores is within the flexibility expected of applicants in the sequential test. The Southam Road store is some 16% larger in terms of net sales floorspace than the Spiceball proposal. This is larger than the difference than usually claimed for by applicants to demonstrate flexibility – 10% is more normal – but it is not in our view an unreasonable amount of flexibility. There is considerable flexibility in the use of floorspace in

food stores and operational adjustments are required to overcome physical constraints in most food stores all the time, even if it is understandable that retailers would wish to avoid such limitations in new shops where possible. Turley points out that the internal layout is not fixed and indeed the application is in outline and the store sized is not fixed. We are not sure how much the foodstore element could be increased.

- 3.30 We are not convinced by the argument that the store would have to be of the size proposed to compete against the larger food stores in the town. These include substantial areas devoted to comparison goods sales (albeit more limited in the Morrison store) and Waitrose has a successful format which is generally accommodated in smaller buildings and clearly competes very successfully.
- 3.31 We conclude that the applicant has not made a satisfactory case in relation to the difference in size of the two proposals.

Configuration

- 3.32 Waitrose states that the Spiceball store is too long and thin and does not allow for a satisfactory store layout or sufficient width of aisles. Neither Waitrose nor Framptons supply details to support the claim. Turley comments that those matters fall within the flexibility of format and that the form of the Spiceball foodstore is not fixed in that level of detail. The Council may be more aware of how much scope for amending the plans there is on the Spiceball site. The applicant can be expected to have very much maximised the floorspace provided and the site does not appear to allow a significantly different building on it. Turley has not demonstrated that significantly different layouts are possible. We consider that more information is needed from them before the Council could conclude on this point either way. The applicant needs to demonstrate the problems to which the store shape gives rise and the limitations on store configuration which the site imposes.

Vertical Circulation and Multi-level Car Parking

- 3.33 Waitrose claims that the lifts and travellers reduce the amount net sales floorspace. It is not clear whether these are included in the net sales floorspace of 25,000 sq. ft. quoted or not. Waitrose does operate from stores with multi-level car parking – examples in Bath and London are quoted by Turley and we are familiar with the Waitrose shops at Cheltenham and Southsea. Although there may be differences, the applicant has not explained why these solutions would not be acceptable in

Banbury. In addition we note that Sainsbury has used multi-level parking to increase capacity in some of its stores such as its store at Newbury. Because the car park is long and narrow, some of the car parking spaces are a long way from the store entrance. However, it is likely that these would only be used at major peak periods.

Complexity

- 3.34 Waitrose states that overall scheme is a complex, mixed use multi-level redevelopment of a constrained town centre site including a hotel, cinema and restaurants and bars and that Waitrose customers would find themselves competing with users of these facilities for parking. This would rule out virtually any town centre site in the sequential test and the acceptance of general claims of this nature would undermine the sequential test. However we do not believe it to be a true description of the proposal. The foodstore is separated from the rest of the development and would be seen as freestanding foodstore with its own parking. We are not sure on what terms the parking would be offered to Waitrose, but it is generally possible to manage car parking for food stores in town centres through many means and Waitrose operate such controls for example in Monmouth and Southsea. Car parking is charged on all town centre car parks and this undoubtedly gives the out of centre food stores a significant advantage, it is possible to manage parking to provide free parking for Waitrose customers and this would reduce the competition for spaces with other users.

Conclusions on the Sequential Test

- 3.35 Overall, we conclude that Council does not have the information available to conclude that the Spiceball site is unsuitable for the proposed store. It is clear from the Dundee judgment that although suitability has to be judged in terms of its suitability for the application proposal, flexibility is required from applicants. The reasons for rejecting the site put forward on behalf of the applicant are not well substantiated by evidence and do not appear to stand up well to scrutiny.
- 3.36 We conclude that the Council cannot rely on a bald statement that the Spiceball site would not be viable trading location in sales terms. The store is smaller than its competitors in the town and although the size of the foodstore is not irreversibly fixed in the outline application, the scope for expanding it appears limited. However, Waitrose stores do not sell the wide range of comparison goods sold in the Tesco Extra and Sainsbury and Waitrose has developed a very successful format based around stores which are smaller than their competitors. The problems in the configuration

are considered in general terms only and the extent of the problems it causes are not specified - even the restricted aisle width is not quantified. Finally we do not accept on the information before us at present that the proposal would be a complex town centre scheme which would discourage Waitrose shoppers. It appears to us that it would operate as a free-standing store on the edge of the town centre with good accessibility by car.

- 3.37 It is fully understood why, faced with a choice Waitrose would chose the Southam store but we conclude at present that it has not demonstrated the flexibility needed to conclude the sequential test is passed. That is not to say that it could not be passed but that the evidence submitted so far does not allow the Council to conclude that the Spiceball proposal is unsuitable. We also conclude that the Bolton Road site requires more consideration from the applicant, in particular with regard to the multi-storey car park site in isolation, although the Council may have sufficient information on its availability. It is arguable that the Council does not have the information available to determine the application either way. However, the onus is on the applicant to demonstrate that more central sites are unsuitable or unavailable and planning permission should be refused were this is not done.
- 3.38 Waitrose's letter indicates that it would not locate to the Spiceball site even if planning permission for the Southam Road site is refused. This is not, in our view, enough to satisfy the sequential test. It is incumbent on the applicant to demonstrate that the alternative site is unsuitable having due regard to the need to demonstrate flexibility. Although it would come down to the Council's judgement on the flexibility shown by the retailer, there is in fact a lack of evidence so far to allow it to conclude whether the retailer has shown sufficiently flexibility or not.

4.0 Retail Impact

- 4.1 We will consider the impact on the vitality and viability of the town centre before assessing the likely impact on investment in the centre. The retail impact assessment has been carried out by Peter Brett Associates (PBA). It has used 2013 prices throughout.

Design Year

- 4.2 PBA has adopted a design year of 2019. This is based on the store opening in 2017, and the second year full year of trading being 2019. We would normally expect a store to open within 12 – 18 months of permission being granted and although there may be reasons for the extended construction programme, in the absence of any explanation, we consider that the design year should be 2018. However, although population and expenditure growth for a further year would cushion the estimated impact, this would not affect the conclusions on impact unduly.

The Study Area

- 4.3 The study area includes Daventry and Southam in the north, Brackley in the west, Bicester and Kidlington in the south and Stow-on-the-Wold in the west. It extends to the edges of, but excludes, Stratford-on-Avon, Leamington Spa, Witney and Oxford. These towns are likely to exert a considerable influence on shopping patterns in the study area, and PBA defines a primary catchment area which includes only zones 1-4 of the study. This is a more suitable catchment area for convenience goods shopping in Banbury. Zone 4 is centred on Brackley and most shoppers in zone 4 use food stores in the town, rather than travelling to Banbury. This is likely to limit the trade draw to the proposal from zone 4. So will the Waitrose in the town. We will comment again on the trade draw if necessary.

The Turnover of the Proposal

- 4.4 The turnover of the proposal is estimated in the standard way from floorspace and the average sales densities (turnover/sq. m) of the occupier. The net sales floorspace is estimated at 2697 sq. m which is about 75% of the gross internal floorspace. This is a high percentage compared with other food stores but appears to be fairly standard in relation to Waitrose stores. PBA offers two scenarios for the amount of net sales floorspace used for comparison goods – 15% and 30%. The

sales densities used are reasonable, but it is not made clear whether they include VAT or not. This should be clarified. Subject to that clarification the turnover estimate of between £28.09m and £30.59m, with comparison goods sales between £2.46 and £4.93m is reasonable. PBA makes a small allowance for growth in sales densities of 0.15% a year for increases in sales densities - again reasonable.

Local Population and Expenditure

- 4.5 The population forecasts are shown in App C Table 5. They are taken from the latest Experian forecasts. This is a widely used set of data from a respected source. Notwithstanding this, the population increase seems high, and this is apparent when comparing the increase of just under 3,000 in the study area in the three years 2011 compared with 14,000 increase between 2014 and 2019. The growth rate works out at 4.5% over five years which is rather high in general terms. The ONS 2012 based forecasts indicate a simple growth rate of 2.8% for Cherwell District and 3.1% for Oxfordshire as a whole. We conclude that the population increase 2014 - 2019 is probably overestimated, although the effect on the impact assessment will be marginal.
- 4.6 The local expenditure forecasts in Tables 4 (convenience goods) and 10 (comparison goods) are also from Experian. The reports are not presented but the figures are reasonable and we have no reason to doubt them. The forecasts of local retail expenditure are based on the Central Case forecasts of Experian Briefing Note 12.1. We cannot exactly replicate the forecasts for comparison goods but the differences are too small to be significant.
- 4.7 It is not clear from the footnotes exactly what data has been used to deduct special forms of trading (SFT - which now comprises largely internet shopping) but it appears to have been adjusted for internet sales through existing floorspace. It also allows for an increase in SFT during the forecast period although details are not given.
- 4.8 Tables 5 and 11 calculate the available retail expenditure in the study area for convenience and comparison goods respectively. It is based on the expenditure excluding SFT. It is a straightforward mathematical exercise and no further comment is needed.

The turnover of existing stores and centres

- 4.9 The turnover of existing stores and centres are calculated from the market shares shown in Tables 6 and 12. It is not clear how these market shares have been calculated from the household survey

results, although in relation to convenience goods the market share figures are very close to the answers to Question 1 of the survey i.e. Where did your household last undertake a main food shop? The lack of transparency in the calculations of market shares is generally undesirable and we may comment later.

- 4.10 The turnover of existing stores is estimated by multiplying the available retail expenditure in each zone (Tables 5 and 11) by the market share (Tables 6 and 12). The estimated convenience goods turnovers in 2014 and 2019 are shown in Tables 7 and 8 respectively; the comparison goods turnovers in Tables 13 and 14. The turnover of stores and (centres in relation to comparison goods) which draw turnover from beyond the study area are underestimated, because no allowance has been made for expenditure flows into these stores and towns from beyond the study area. This will lead to the overestimation of the impact on them. Since we are concerned most with centres in the primary catchment area, this does not undermine the impact exercise and is preferable to making allowances for inflow expenditure for which no empirical evidence exists.
- 4.11 There is however, a clear problem with the estimated turnover of the Aldi store in Banbury with the turnover estimated at nearly £37m. This is not credible for a store with a total net sales floorspace estimated at 743 sq. m (Table 2) and a benchmark turnover (based on company average sales density) estimated at some £8m. The problem clearly arises from the household survey results which shows for instance that between 13% and 15% of respondents reported having last used Aldi for their main food shop in zones 1 and 2 and 25% in zone 3. These percentages far exceed the market share of Aldi nationally or for other Aldi stores in the survey and why the figures should be so high is not apparent. The problem is probably exacerbated by, in effect, assuming the same basket size for Aldi as the other main food stores, when it is probably smaller, given the restricted number of lines it sells.
- 4.12 The corollary of the overestimation of the Aldi turnover is that the turnover of the other food stores in Banbury, which draw a large proportion of their turnover from zones 1-3, will be underestimated and this is borne out by comparing the survey based turnover estimates with the benchmark turnovers PBA calculated in Table 2.

This is tabulated below.

Store	Benchmark	Survey Based	Difference
Aldi Banbury	£ 7.85m	£36.51m	+ £28.66 m
Morrison Banbury	£37.44m	£35.56m	-£ 1.88m
Sainsbury Banbury	£50.25m	£41.50m	-£ 8.75m
Tesco Extra Banbury	£62.42m	£50.75m	-£11.67m
M & S Foodhall	£10.91m	£2.53m	-£ 8.33m

It is clear that the overtrading calculated by PBA in the Aldi balances out the under-trading estimated in the other stores. It appears to us that the overall convenience goods floorspace in the town is broadly in balance with the available expenditure and that in fact the main stores are not currently seriously under-trading. Since all the stores but the M&S foodhall are out of centre, the overestimation of the Aldi turnover will have a limited effect on the estimated turnover of the town centre, and will tend to over-estimate the impact.

The Proposal's Trade Draw (Convenience Goods)

- 4.13 Para 3.6.1 describes the overall trade draw to the store as 75% coming from zones 1-4, 20% from the rest of the study area and 5% from beyond it. This appears reasonable and the 5% from beyond the study area is not an excessive allowance in view of the sites location on the A361. It also explains why, as Turley notes, only 95% of the turnover has been treated as trade draw from existing stores in Table 9.
- 4.14 The trade draw form the Zones 1-4 and the rest of the study area is treated separately in Table 9 in columns 4 and 5 . However the totals shown at the bottom of these columns are plainly wrong and should be disregarded. The correct totals are £21.47m and £5.70m, which approximately match 95% of the convenience turnover of £28.82m in 2019 from Table 2 (once an allowance is made for rounding in the printed tables).
- 4.15 It is not clear in either the tables or the main report how the trade diversions from individual stores have been calculated or how they relate to shopping patterns in the zones. Although the trade diversions appear to be bear some relationship with market shares of the larger stores within zone

1, without considerably more explanation of where the figures have been derived from, the impact assessment should not be relied upon. We also believe that the trade diversion from stores outside the study area is, at the 15% estimated by PBA, too large given the size of the study area and the shopping facilities in the towns in the secondary catchment area. It would follow that the impact on stores within the study area would be correspondingly greater.

- 4.16 Notwithstanding the lack of explanation, it is clear to us that the impact of the proposed store would fall mostly on the large, out-of-centre stores in Banbury. This is because Banbury is strongly dominant in its own primary catchment area and there is little prospect of trade being “clawed back” from other towns. The only main food stores in the town centre of Banbury are a Tesco Express and the M&S foodhall. The Tesco Express relies on people already in the town centre and few would divert to an out-of-centre store. There is a considerable degree of overlap in the Waitrose and M&S offers and we would certainly expect more trade diversion than £0.19m suggested by PBA. However, we also believe that its turnover is significantly greater than suggested (because of the unrealistic estimate of the Aldi market share) and this has to be seen in the context of the turnover of the town centre as a whole. It is highly unlikely that M&S would close its foodhall as a result of the increased competition from an out-of-centre Waitrose.

The Proposal’s Trade Draw (Comparison Goods)

- 4.17 The comparison goods turnover of the proposed store is relatively small – between £2.65m and £5.31m in 2019m depending on the amount of floorspace used (15% or 30%). The impact assessment is based on the higher of the figures. The turnover compares with a town centre turnover of estimated by PBA of over £254.72m in 2014 and £301.16m in 2019. PBA’s estimate is subject to the same lack of explanation of how the market shares have been derived from the household survey. The Cherwell Retail Study 2012 Update estimated the town centre turnover at £296.8m in 2012. Allowing for the different price base and growth of population and expenditure between 2012 and 2019, PBA’s estimate is lower than the Retail Study’s and it should not in our view be regarded as an over-estimate.
- 4.18 The trade draw from individual stores and centres is open to the same criticism as the convenience goods trade draw- that it lacks explanation or justification. We do not consider that the assumption that 45% of the comparison goods turnover would be diverted from the town centre is

unreasonably low. However, it is clear that the trade diversion will be a small percentage of the town centre's turnover.

The Vitality and Viability of the Town Centre

- 4.19 PBA presents a health check in section 3 of the impact assessment. This does not include the two main commercial indicators of rents and yields. These are important to the understanding of the viability of commercial developments. Nevertheless, PBA concludes that the town centre is performing reasonably well considering that middle order centres have been under pressure in the last few years as a result of structural changes in the retail and leisure sectors. We agree with both the assessment of the centre and the vulnerability of centres of this size to structural change. While the continued success of the centre should not be taken for granted, we consider that in terms of impact assessment over the next few years, Banbury town centre could not be regarded as susceptible to relatively small impacts.

Solus Impact on Vitality and Viability

- 4.20 The combined (convenience and comparison goods) impact of the proposal on the town centre is estimated by PBA as between 0.5% and 0.8%, depending on the extent of comparison goods floorspace. We have questioned some of the assumptions and calculations that have led these figures, and indicated that in our view the impact is likely to be greater. However, it is clear, just from the relative turnovers of the proposal and the town centre and the dominance of out-of-centre food shopping in the town that, on its own, the impact of the proposal on the vitality and viability of the centre is unlikely to be sufficiently adverse to justify the refusal of planning permission on this basis and that such a case would be unlikely to succeed at appeal.

Impact on Planned Investment in the Town Centre

- 4.21 The main investment planned in the town centre is the Spiceball development. PBA accepts that it has planning policy status, but states that there is little information publicly available and no named operators for the foodstore or the leisure developments. PBA also argues that there is no definitive timescale, no reserved matters application and no retailers attached to the scheme. These are not required pre-conditions for an investment proposal to be considered relevant.
- 4.22 PBA argues that since Waitrose has stated that it will not go to the Spiceball development, the application proposal would not divert a retailer that would have otherwise have taken floorspace in

the town centre extension scheme and that the impact on investor confidence in that scheme, and any implications for its delivery, are likely to be negligible. It further argues that *“Waitrose occupying a foodstore at the application site will not prejudice the delivery of the Spiceball site because at no point has Waitrose committed to that site.”*

4.23 However, the impact test on investment is much broader than that and not limited to whether an operator would otherwise go to a town centre scheme. Turley argues that the Spiceball scheme would be viable if anchored by a foodstore operator, that the loss of Waitrose from the scheme would have a direct effect on the viability of the scheme, that there would be a direct impact on operator demand through the removal of a potential anchor and a deterrent effect on potential alternative occupiers by diverting expenditure that would otherwise underpin store viability. Turley considers that these factors would have a damaging effect on investor confidence. However, the objection does not establish that the foodstore is necessary for the viability of the overall Spiceball scheme, that there are no other food retailers interested in the scheme, or that other potential retailers would be put off by an out-of-centre Waitrose.

4.24 We understand that the Spiceball scheme is proceeding as a phased development, with the foodstore as a phase 2. The foodstore site is in different ownership from the canal-side leisure development and is physically separate. This suggests strongly that the foodstore is not essential to the viability of the overall scheme. Nor do we accept that the Waitrose development would have a significant deterrent effect on other retailers. Waitrose targets a very particular section of the food retail market and other retailers (with the exception of M & S) do not seek to target the same segment of the population. Although the Waitrose would reduce the total volume of spending available for other food retailers, this is unlikely to dissuade other retailers. Waitrose’ specialist market positioning, would not in our view be a major disincentive for other retailers. The main problem for new retailers would remain the large food stores with which they would have to compete. Given the existing food stores in the towns and the limited expansion plans of the main food retailers at present, it is far from clear that there would be an alternative foodstore operator. Lidl is the only candidate that appears likely.

4.25 We therefore conclude that there is little clear evidence the proposed store would undermine the main investment proposals in the town centre. The rest of the Spiceball development is, according to our instructions, expected to go ahead anyway. There is no clear evidence that there is no alternative retailer for the remainder of the site, and the available evidence suggests that Waitrose

is unlikely to go the Spiceball site if planning permission were refused on the Southam Rd site. We conclude that there is insufficient evidence to refuse planning permission on the basis of the proposals impact on proposed investment.

Cumulative Impact

- 4.26 The cumulative assessment is set out in Table 17 in Appendix C and summarised in Table 5.6 of the main report. PBA sets out the commitments it has taken into account in section 3.7 of the report. These are the Banbury Gateway development, the Spiceball development and the permission for a foodstore at Brackley. It also notes two permissions at Moreton-in-Marsh and the Sainsbury development at Bicester. It notes that in view of the existing shopping patterns in the area the impact of these three proposals in the secondary catchment area is more limited and that they are not incorporated in the quantified impact assessment. We agree that this is not necessary.
- 4.27 PBA has restricted its cumulative impact assessment to the convenience goods turnover of the proposal. The Council must be concerned with the town centre as a whole when the permitted developments go ahead and the “convenience only” assessment clearly fails to give this guidance. The key development is the Banbury Gateway development which will establish a significant out-of-centre retail location with major anchor stores (Next and M & S). Much of its impact will be on the comparison goods turnover and, within that, the clothing sector which is generally seen as the key retail sector for town centres. The PBA analysis fails to consider this and to provide a realistic assessment of the health of the town centre following the development.
- 4.28 The level of explanation given in table 17 and the main report is wholly inadequate to understand the source of the data, the calculations or the judgements made about trade draw and is largely incomprehensible. For instance cumulative impact on the town centre is assessed as positive (+316%) but this is only possible because of the inclusion of the foodstore on the Spiceball site in the exercise. This is explained in para 5.3.12 as

‘It is clear that, considered cumulatively, there will be an overall uplift in the amount of convenience spending taking place in the town centre. The effect of the new Spiceball foodstore in the town centre will bolster it as a convenience shopping destination; thus, whilst there will be a degree of diversion from existing shops in the centre, this will be outweighed by expenditure being diverted into the town centre’.

However, we have been unable to find any estimate of the proposal's turnover in the report, or the assumptions that underlie it.

- 4.29 Turley objects to that approach on the grounds that if the Southam Rd proposal is permitted, the Spiceball proposal will not go ahead and the impact would therefore be negative. It has not been established that Waitrose is the only possible retailer and we do not agree with Turley that it should be excluded from the cumulative impact exercise on the basis that planning permission has not been granted – it has proceeded far enough to be taken into account. However, there is some uncertainty and the turnover of any proposal may well not be as large as assumed by PBA so the Council should be wary of according too much weight to any increase in the convenience goods turnover of the town centre. It also needs to bear in mind that the cumulative impact is likely to be significantly negative once the impact of the comparison goods trade diversion to the Gateway development is taken into account. .
- 4.30 There is a further problem. PBA has estimated the trade diversion from the town centre to the Waitrose store at some £0.35m (Table 7). This compares with trade diversion of some £2.26m estimated to be diverted from the town centre to the Sainsbury proposal at Brackley. It is not really credible that a large store within about 800 m of the town centre would have so little impact, when a moderately sized food store some 14 km away would draw over six times as much. It can occur in the calculations only because the convenience goods turnover of the town centre has increased as a result of the Spiceball development. It would follow that in the cumulative impact exercise, the trade diversion to the Southam Rd store from the proposed Spiceball foodstore should be assessed on a similar basis. In our view, it points to the underestimation of the trade draw from the town centre in the solus impact exercise.
- 4.31 The cumulative impact assessment is clearly inadequate and fails to give the Council a reliable view of the impact and health of the town centre following the Banbury Gateway development. Considerably more work is required before the cumulative effects of the relevant permissions could be assessed. In particular this needs to take account of full effect of the Banbury Cross development on the town centre and to be clear as to the assumptions made about the turnover of the Spiceball foodstore. However, given the limited solus impact that is likely, the contribution that the proposal would make to any cumulative impact would be limited. It would be difficult to sustain a refusal of planning permission on cumulative impact grounds when the application proposal makes a very limited contribution to the cumulative impact.

Conclusions on Impact

- 4.32 We conclude that the basic parameters of the impact study are sound. The survey results give rise to the substantial over-estimation of the turnover of the Aldi in Banbury and underestimation of other food stores. For the most part these are out-of-centre and the effect on the estimated impact on the town centre will be limited. However, the convenience goods turnover of the town centre will be affected by the likely underestimation of the M & S turnover. The assumptions about where the proposed store would draw its trade from are not well explained or supported by evidence and appear to overestimate the turnover drawn from beyond the study area and understate that drawn from the town centre. PBA estimated the combined convenience and comparison impact at between 0.5% and 0.8%. While we consider the impact is likely to be bit higher, it is clear that impact on the town centre will be limited because the town centre turnover is large compared with that of the proposal, and the main impacts will be felt by the out-of-centre food stores. We therefore conclude that the solus impact of the proposal on the town centres vitality and viability would be acceptable and an impact case difficult to sustain.
- 4.33 We conclude that an objection based on the impact on planned investment would be difficult to sustain. The Spiceball development is a material consideration in this context, but we understand that the non-retail part of the development is proceeding as Phase 1 and that the viability of this part of the development is not dependent on the inclusion of the foodstore. Nor is it physically dependent. The evidence suggests that Waitrose would not take a unit on this site even if the permission for the current application was planning permission is refused, although there must be some doubt about this since it relies on Waitrose' statement. However, there is no evidence to suggest that an alternative taker for the foodstore proposed could not be found. Nor does the evidence suggests the grant of permission on the Southam Rd site would discourage alternative food retailers – the main competition would remain the large out-of-centre stores and any retailer would be to be confident that it could compete with these.
- 4.34 The cumulative impact assessment taking account of the Banbury Gateway development, the Spiceball development and the Sainsbury store at Brackley is inadequate and fails to give the Council a reliable view of the town centre following the Banbury Gateway development. More explanation of the sources used and the calculation is necessary, and it is not sufficient to assess the cumulative impact on the basis of convenience goods only. However, it is clear that whatever the cumulative impact on the town centre estimated, the contribution of the application proposal

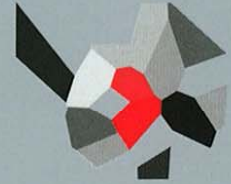
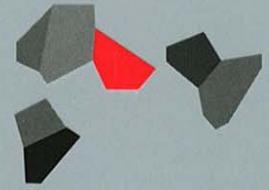
would be limited and it would be unreasonable to refuse planning permission on the basis of the cumulative impact, having previously accepted a much larger impact.

- 4.35 Overall, we therefore conclude that it the proposal would not have a significantly adverse impact on the town centre and that such a case would be difficult to sustain at an appeal.

5.0 Conclusions

- 5.1 The site is in an out of centre location and under both national and local policy should be determined according to the sequential and impact tests.
- 5.2 In relation to the sequential test, most of the sites considered by the applicants can be ruled out as not available. We consider that the applicant has not assessed the Bolton Road site correctly and should have considered the ownerships separately rather than rejecting it as in multiple ownership and therefore not available. The multi-story car park site, in Council ownership, should have been assessed on its own but we have concluded that in the absence of any clear steps to bring the site forward for redevelopment, it would be difficult to demonstrate that it could be available as an alternative.
- 5.3 The Spiceball site is a town centre site with a resolution to grant planning permission a mixed use scheme including a foodstore. The site is vacant and clearly available. Under the Dundee judgement, a site's suitability has to be judged according to whether it is suitable to accommodate the development applied for but applicants are expected to demonstrate flexibility. Waitrose puts forward reasons why it is unsuitable for it. It claims that the site would not give the weekly sales to make it viable and cites several reasons it is unsuitable. In relation to weekly sales figures, there is no evidence submitted to support the contention. Although Waitrose cites confidentiality as the reason of the lack of evidence, the Council should not rely on this assertion without any evidence and it is, on the face of it, difficult to see why the weekly sales figures would be so different from a nearby site. Although Waitrose claims that the Spiceball site is a complex urban site in a mixed development, this does not appear to be correct, at least in relation to the application scheme. The foodstore is separated from the rest of the development, would operate as a freestanding foodstore and benefits from the same good vehicular access as the Castle Quays Shopping Centre.
- 5.4 We conclude that the applicant has not demonstrated sufficient flexibility to pass the sequential test. The onus is on the applicant to demonstrate that the site is not suitable and we suggest that applicant is invited to submit further information on this matter. Both paragraph 27 of the NPPF and the NPPG indicates that development should be refused unless the sequential test is passed, and the NPPG suggests that there is no need to consider the impact test unless the sequential test is first passed.

- 5.5 The impact test as set out the NPPF has two parts – the impact on existing, committed and planned investment and the impact on the vitality and viability of the centre. In relation to the impact on planned investment, the key consideration is the impact on the planned development of the Spiceball site. We are advised that the majority of the development is being progressed in advance of the foodstore site and will go ahead whatever the decision on this application. In relation to the remainder of the development, the available evidence suggests that Waitrose would not go to the development if planning permission is refused on the Southam Rd site. It is also not clear that Waitrose is the only possible operator for the foodstore. We conclude that the evidence that the proposal would have an adverse impact on investment is not strong.
- 5.6 In relation to the impact on the vitality and viability of the town centre we conclude that the solus impact would not be sufficient to amount to a significant adverse impact. This arises from the size of the town centre turnover, derived mostly from comparison goods sales, and the fact a large proportion of the impact would fall on the large food stores which are out of centre.
- 5.7 In relation to the cumulative impact of the proposal together with other relevant permissions, the town centre is will shortly experience a substantial change with the opening of the Banbury Gateway development. The cumulative impact assessment is deficient in not assessing the diversion of comparison goods sales from the town centre and its impact. It also fails to explain the source of the figures and the calculations undertaken. Substantial revision to the impact assessment would be needed before it could be assessed let alone relied on. However, the current application would have only limited additional impact and it would be unreasonable to refuse planning permission on the basis of cumulative impact, if the development in question would make such limited contribution to the cumulative impact. The argument is likely to go other way – that if the much larger impact of the Banbury Gateway development was acceptable, the Council is being inconsistent if it refuses the current application. The Council may therefore consider it unnecessary to ask for work on cumulative impact if it accepts this line of reasoning.
- 5.8 We therefore conclude that the proposed development is unlikely to have a significant adverse impact on Banbury town centre, or any other centre.



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