

**TOWN AND COUNTRY PLANNING ACT 1990**

**2**

**RETAIL IMPACT ASSESSMENT**

**SOUTHAM ROAD RETAIL PARK, KRAFT  
SITE, BANBURY**

**ON BEHALF OF KRAFT FOODS UK LTD &  
BARWOOD DEVELOPMENTS LTD**

**MARCH 2012**

**CHARTERED  
TOWN PLANNING  
CONSULTANTS**

## 1.0 INTRODUCTION

### **Purpose of this Retail Impact Assessment**

- 1.1 This Retail Impact Assessment has been prepared by Framptons in support of a planning application submitted by our clients, Kraft Foods UK Ltd and Barwood Developments Limited, for a retail development scheme at a site adjacent to Southam Road , Banbury.
  
- 1.2 The proposed scheme comprises a superstore with associated petrol filling station and a range of comparison stores. The superstore will provide 5,574 sq.m of gross floorspace of which 2,787 sq.m would be used for retail sales. The proposed comparison goods stores will provide upto 7,432 sq.m of gross floorspace of which 5202 sq.m will be for retail sales. The combined elements of the scheme will provide a total floorspace of 13,006 sq.m gross.
  
- 1.3 This report provides details of the retail aspects of the proposed development, and addresses the national and local policy impact tests in relation to proposals for retail development and other town centre uses as set out in PPS4 and the relevant local planning policy framework.
  
- 1.4 The sequential test, which is also required by national and local planning policy for retail development and the development of other town centre uses, is considered in a

separate report also prepared by Framptons and is contained within the Sequential Test document which has been also submitted as part of this application.

### Structure of the Report

1.5 The remainder of the report is structured as follows:

- Section 2 describes the application site and the proposed development;
- Section 3 reviews the relevant national and local planning policy requirements;
- Section 4 assesses the application against criteria d) and e) of Policy EC10.2 of PPS4, which relate to economic and employment impacts;
- Section 5 assesses the impact of the proposal against Policy EC16 of PPS4; and
- Section 6 provides a summary of the assessment, together with overall conclusions.

## 2.0 THE APPLICATION SITE AND THE PROPOSED DEVELOPMENT

### The Application Site

- 2.1 The application site is located about 800 m to the north west of Banbury Town Centre on the western side of Southam Road. It is bounded by the Kraft Food factory to the north and west, Banbury Cemetery to the south and Southam Road to the east. The site is currently used in part by Kraft for parking. There are two existing principal buildings on site both of which are no longer used by Kraft.
- 2.2 Full details of the application site are provided in the Planning Statement and the Design and Access Statement.

### The Application Scheme

- 2.3 The proposed development comprises a new food store and petrol filling station, together with a range of retail warehouses. The food superstore will provide the largest element of the scheme, with a gross floorspace of 5,574 sq.m and a sales area floorspace of 2787 sq.m, and will contain a mix of convenience and comparison retail floorspace. The retail warehousing is to be divided into a number of individual units. Overall these elements will have a gross floorspace of upto 7,432 sq.m and a sales floorspace area of upto 5,202 sq.m. Negotiations with potential occupiers of the stores are ongoing.

2.4 A schedule of the floorspace of each element of the scheme is presented in Table 2.1 below and full details of the proposed development are provided in the Planning Statement and Design and Access Statement, also submitted as part of this application.

Table 2.1

Unit	Use	Gross Floorspace Sq.m	Sales Area Floorspace Sq.m
	Food superstore	5,574	2,787
A	Retail Warehouse	929	650
B	Retail Warehouse	929	650
C	Retail Warehouse	929	650
D	Retail Warehouse	929	650
E	Retail Warehouse	929	650
F	Retail Warehouse	929	650
G	Retail Warehouse	1858	1301
Total		13,006	10,594



### 3.0 NATIONAL AND LOCAL PLANNING POLICY

#### **Planning Policy Statement 4 – Planning for Sustainable Economic Growth (December 2009)**

3.1 PPS4 sets out the requirements of national policy insofar as it relates to planning for the location of retail and other town centre uses. Policy EC 10.2 specifies five impact considerations that any planning application for economic development must be assessed against. Policy EC 14 describes the supporting evidence that should accompany planning applications for main town centre uses, which includes retail development. In particular Policy EC 14 requires that:

- A sequential assessment is undertaken for planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date development plan, but only where the retail or leisure uses would provide more than 200 sq.m of gross floorspace (Policy EC 14.3); and that
- An assessment of impacts is undertaken under Policy EC16.1 for planning applications for retail and leisure developments over 2,500 sq.m gross floorspace or any other local floorspace threshold set in the development plan process (Policy EC 14.4). Policy EC 14.5 explains that an assessment of impacts may also be necessary for planning applications for retail

developments of less than 2,500 sq.m where the application is not in an existing centre and not in accordance with an up to date development plan.

- 3.2 In making a planning decision based upon an impact assessment, Policy EC 17 advises that planning applications should be refused where there is clear evidence that the proposal is likely to lead to 'significant adverse impacts' in terms of one of the impacts listed under Policy EC 16.1 and Policy EC 10.2 of PPS4. Where no significant adverse impacts have been identified – and where the application also satisfies the requirements of the sequential test – planning applications should be determined by taking account of the positive and negative impacts of the proposal and other material considerations, and also the likely cumulative effect of recent permissions, developments under construction and completed developments.
- 3.3 As this application proposes more than 2,500 sq.m of gross retail floorspace in an out of centre location, an impact assessment is therefore required. Accordingly, Section 4 of this report considers the scheme against the impacts detailed in Policy EC 10.2; Section 5 of the report considers the scheme against the impacts detailed in Policy EC 16; and Section 6 assesses the application in relation to the guidance set out in Policy EC 17. The sequential test referred to in Policy EC 14 and detailed in Policy EC 15 is considered separately.
- 3.4 The clear thrust of current Government policy is to promote economic development; this has been promoted in the Ministerial Statements "Planning for Growth", "Positive

Planning” and “Presumption in favour of Sustainable development” and forms a core principle of the draft National Planning Policy Framework.

- 3.5 The HM Treasury Plan for Growth (23<sup>rd</sup> March 2011) seeks to encourage investment and exports as a route to a more balanced economy. The Plan states:

*“The Government is committed” to ensuring that the planning system does everything it can to support growth.*

- 3.6 In addition to the above, the Statement by the President of the Board of Trade Mansion House dinner speech on 3<sup>rd</sup> March 2011 is also relevant:

*‘Britain is a small part of a growing world economy and will prosper by exploiting growth opportunities in expanding markets – we need to expand the areas where we are world beating .....’*

- 3.7 This fundamental policy principle has been reinforced in more recent Government guidance. The Governments position is encapsulated by the Minister for Decentralisation; the Right Honourable Greg Clark MP’s Statement on 23<sup>rd</sup> March 2011, recognises the role that the planning system has to play in rebuilding the country’s economy and is material to this application. Mr Clark states that the Government will act quickly to make the necessary reforms, but that many of the actions will take months to deliver, and that:



*"This statement therefore sets out the steps the Government expects local planning authorities to take with immediate effect."*

- 3.8 The Statement is a material planning consideration and is uncompromising in its approach to sustainable economic development, stating:

*"The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy."*

And:

*"In determining planning applications, local planning authorities are obliged to have regard to all relevant considerations. They should ensure that they give appropriate weight to the need to support economic recovery, that applications that secure sustainable growth are treated favourably (consistent with policy in PPS4), and that they can give clear reasons for their decisions."*

- 3.9 Further up to date direction for planning policy is contained in the National Planning Policy Framework (NPPF) draft published in July 2011. The weight to be given to the Draft NPPF is considered in advice prepared by the Planning Inspectorate for its Inspectors in August 2011 states that:

*“The draft NPPF is likely to be referred to by the parties in current appeal and development plan casework. Whilst it is a consultation document and, therefore, subject to potential amendment, nevertheless it gives a clear indication of the Government’s ‘direction of travel’ in planning policy. Therefore, the draft National Planning Policy Framework is capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker’s planning judgment in each particular case.”*  
(emphasis added)

3.10 The Draft NPPF states in Paragraph 19 that:

*“planning should proactively drive and support the development that this country needs. Every effort should be made to identify and meet the housing, business, and other development needs of an area, and respond positively to wider opportunities for growth. Decision-takers at every level should assume that the default answer to development proposals is “yes”, except where this would compromise the key sustainable development principles set out in this Framework”* (emphasis added).

3.11 Paragraph 53 states that the primary objective of development management is *“to foster the delivery of sustainable development, not to hinder or prevent development”*.

3.12 Paragraph 54 states that:

*“To enable each local authority to proactively fulfil their planning role, and to actively promote sustainable development, local planning authorities need to:*

- *approach development management decisions positively – looking for solutions rather than problems so that applications can be approved wherever it is practical to do so*
- *attach significant weight to the benefits of economic and housing growth*
- *influence development proposals to achieve quality outcomes; and*
- *enable the delivery of sustainable development proposals.”*

3.13 Paragraph 75 of the Draft NPPF also recognises that the long term protection of employment land should be avoided by LPA’s and applications for alternative uses should be assessed on their individual merits.

3.14 The proposed redevelopment of the application site represents an opportunity for sustainable economic development to be delivered and will bring with it investment and new jobs. The proposed development is in accordance with the pro-growth agenda established through the Ministerial Statement and directly supported by the policies emerging in the Draft NPPF.

- 3.15 Of significance to the determination of the application is the content of the Ministerial Statement of 15<sup>th</sup> June 2011 “Presumption in favour of sustainable development”. The statement confirms that Local Planning Authorities should:

*“grant planning permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.”*

### **Regional Guidance**

- 3.16 South East Plan policy TC1 designates Banbury as a primary regional centre within the strategic network of town centres. As a primary regional centre Banbury is expected to be the focus for growth (after the ‘Centres for Significant Change’) in the town centre uses set out in PPS6 [PPS4]. Policy TC2 refers to having regard to the need to support the function, vitality and viability of town centres.

### **Local Guidance**

- 3.17 The Cherwell Local Plan 1996 contains a number of saved policies that continue to be used until they are replaced by the Local Development Framework. Policy S4 of the adopted Local Plan has not been saved and therefore no longer forms part of the development plan.
- 3.18 Cherwell DC has produced a Non Statutory Local Plan (NSLP) 2011 as part of a process to replace the adopted Local Plan 1996. However, work on the NSLP was



discontinued. It does not form part of the development plan but has been approved by the Council as interim policy for development control purposes.

- 3.19 The Council published a draft Core Strategy in February 2010. However, further progress was delayed as a result of taking account of the Government's stated intention to revoke the RSS. Currently the Council is reviewing the existing evidence base prior to moving forward to a new stage in LDF preparation.
- 3.20 For retail purposes, the Council has produced an updated evidence base that is relevant in the consideration of the application. An assessment has been prepared by CBRE on behalf of the Council which is to inform the formulation of retail policies in the emerging Core Strategy. It is therefore an important material consideration in the context of the determination of this planning application.
- 3.21 Initially CBRE undertook an assessment of future retail capacity within the District in 2006. This work also included an overview of the other PPS6 town centre uses. The findings of the assessment were to inform the preparation of the retail and town centre policies of the emerging LDF.
- 3.22 Since 2006 there were a number of factors – changes to the UK economy; introduction of PPS4; potential abolition of RSS; new data on expenditure estimates; and retail commitments - which were considered to have had an influence on the assessment of capacity which resulted in CBRE being commissioned in 2010 to provide an update assessment. The CBRE update report was published in November



2010 and is considered to be relevant in the context of the emerging LDF and in providing an up to date evidence base on retail capacity.

## 4.0 ECONOMIC DEVELOPMENT CONSIDERATIONS

### Requirements of PPS4

- 4.1 Paragraph 9 of PPS4 explains that the Government's overarching objective is sustainable economic growth. PPS4 takes a wide-ranging and positive view of economic development and Policy EC2 advises local planning authorities to plan for sustainable economic growth.
- 4.2 Similarly, in relation to development management, Policy EC10.1 states that, '*local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably*'.
- 4.3 Policy EC10.2 then specifies five impact considerations that any planning application for economic development must be assessed against, as follows:
- (a) whether the proposal has been planned over the lifetime of the development to limit carbon dioxide emissions, and minimise vulnerability and provide resilience to, climate change – see Design and Access Statement;
  - (b) the accessibility of the proposal by a choice of means of transport including walking, cycling, public transport and the car, the effect on

local traffic levels and congestion (especially to the trunk road network) – see Transport Assessment;

- (c) whether the proposal secures a high quality and inclusive design which takes the opportunities available for improving the character and quality of the area and the way it functions – see Design and Access Statement;
- (d) the impact on economic and physical regeneration in the area including the impact on deprived areas and social inclusion objectives; and
- (e) the impact on local employment.

4.4 As explained in Section 1, the purpose of this Retail Impact Assessment is to assess the application scheme against the requirements of national planning policy relating to the development of retail and other town centre uses as set out, in the main, by PPS4. This report does not include consideration of the proposed development in relation to the climate change, accessibility or design criteria of PPS4 Policy EC10.2. These are dealt with in the Design and Access Statement including Sustainability Assessment and the Transport Assessment. Consequently, consideration is given below to final two criteria specified under Policy EC10.2, relating to economic and physical regeneration, and local employment.

## Economic and Physical Regeneration

- 4.5 The scheme represents significant capital investment in Banbury, in the order of about £40 million, and will bring a previously developed and under-utilised site back into an effective economic use.
- 4.6 There are three large foodstores in Banbury – Sainsbury in the south of the town, Morrisons to the south east of the town centre and Tesco at Lockheed Close, further north from the application site at the junction of Southam Road and Ruscote Avenue. There is a limited range of choice for retail warehousing in the town confined to the eastern side of Southam Road opposite the application site and the Banbury Cross Retail Park to the north of Ruscote Avenue and west of Tesco. The proposed scheme will improve access and choice to a range of retail facilities for residents in the Banbury catchment area (including the rural areas surrounding the town), thereby helping to retain more retail expenditure locally.
- 4.7 Improving access to essential retail and other local services is particularly important in helping to increase social inclusion and combat the effects of deprivation. It is therefore important to note that the ‘Banbury Ruscote 005B and 005F’ Super Output Areas (SOA) are within the top 20% most deprived SOAs nationally taking into account the seven deprivation domains. They are 5<sup>th</sup> and 6<sup>th</sup> respectively in Oxfordshire as a whole. These SAOs are within a 10 minute walk of the application

site and, if approved, the development would be the closest large retail facility to these SOAs.

### Local Employment

- 4.8 At this stage it is difficult to precisely specify the number of jobs that will be created by the proposed development. It is clear, however, that the proposed scheme will generate a substantial number of new jobs. An estimate has been undertaken using the HCA Guidelines on Employment Densities (2<sup>nd</sup> Edition 2010) and this indicates that about 350 jobs would be provided – principally within the foodstore. Positions are likely to include store assistants and managers, warehouse staff and drivers/distribution staff, chefs, kitchen staff and cleaners. Short term employment opportunities will also be created during the construction phase. This job creation is particularly important at a time of high unemployment and represents a key positive benefit, particularly given the socio-economic characteristics of the Banbury Grimsbury and Castle 004A SOA which in 2007 had the highest rank in Oxfordshire and was in the 20% most deprived area nationally for the employment domain. It is apparent therefore that the proposed development could be of considerable assistance in helping to overcome a ‘hot spot’ of deprivation in Banbury. The Annual report published by the Cherwell Local Strategic Partnership in 2010 confirmed that notwithstanding some improvements in local conditions, *“there are parts of several areas in Banbury across the three wards of Ruscote, Neithrop and Grimsbury and castle which rank amongst the 20% most deprived in the country”*.



## Summary

- 4.9 The scheme will not result in any significant adverse impacts in relation to the final two criteria specified under Policy EC10.2 of PPS4. Moreover, the application scheme will deliver a range of local economic and employment benefits. For the reasons set out above, it is clear that the proposed development satisfies the requirements of criteria (d) and (e) of PPS4 Policy EC10.2.

## 5.0 IMPACT ASSESSMENT

### Requirements of PPS4 and the Local Plan

5.1 Policy EC14.4 requires that impact assessments are undertaken for planning applications for retail and leisure developments which will provide over 2,500 sq.m of gross floorspace (or any local floorspace threshold) which are not in an existing centre. The application scheme proposed the development of upto 13,006 sq.m of gross floorspace and an impact assessment is therefore required.

Policy EC16.1 specifies six impacts which should be appraised in an impact assessment, as follows:

- a) 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;
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and the range and quality of the comparison and convenience retail offer;
- c) the impact of the proposal on allocated sites outside town centres being developed in accordance with the development plan;
- d) the impact of the proposal on in-centre trade/turnover and on trade in the wider area, taking account of current and future consumer expenditure capacity in the catchment area up to five years from the

time the application is made, and, where applicable, on the rural economy;

- e) if located in or on the edge of a town centre, whether the proposal is of an appropriate scale (in terms of gross floorspace) in relation to the size of the centre and its role in the hierarchy of centres; and
- f) any locally important impacts on centres.

5.2 Policy EC14 explains that *'the level of detail and type of evidence and analysis required in impact assessments should be proportionate to the scale and nature of the proposal and its likely impact'*. The impact assessment presented in this section therefore focuses firstly on the foodstore element of the scheme, which comprises by far the largest individual element of the proposed development. Secondly, the impacts of the retail warehousing combined are assessed separately.

5.3 Policy EC14.7 explains that the assessment of impact should focus, in particular, on the first five year period after the implementation of a proposal. We anticipate that the scheme will be fully open and trading by the middle of 2016, and so we consider it appropriate to assess impacts at 2021 (that is, five years from the date of opening).

5.4 Paragraph 80 of the draft National Planning Policy Framework (NPPF) states that the impact of proposed developments should be assessed *'...up to ten years from the time the application is made.'* It is considered that any adverse impacts on defined centres would be reduced if a longer timeframe was considered, primarily because of the effects of long-term expenditure growth. However, the NPPF is still in draft form and

so we have assessed impacts at 2021 in accordance with PPS4, which remains the national policy statement on planning for economic development at the time of writing. If the final version of NPPF changes the timeframe for assessment, then an update of this report will be prepared and submitted.

- 5.5 As there is no saved Local Plan policy in respect of retailing, the approach set out in PPS4 has been used for the purposes of assessing the impact of the scheme. Before the impact of the proposed development is assessed, it is necessary to first consider the likely turnover arising from the proposed retail floorspace and the likely catchment area which the application scheme will serve.

#### **Turnover of the Application Scheme**

- 5.6 As explained in Section 2, the proposed scheme will provide upto 10,594 sq.m of retail sales area floorspace. Having regard to the nature of the scheme, the proposed superstore is considered separately from the retail warehousing. For the foodstore, assuming that 60 per cent of the retail sales area floorspace will be used for the sale of convenience goods and that the remaining 40 per cent will be used for the sale of comparison goods, the proposed scheme will provide 1,672 sq.m of convenience goods sales floorspace and 1,115 sq.m of comparison goods sales floorspace.
- 5.7 For the proposed convenience goods floorspace, we have assumed a sales density of £12,600 per sq.m at 2021. This is the average sales density for new convenience floorspace in non central areas used by CBRE for 2021 in the Retail Study Update



2010 that was undertaken for Cherwell District Council. It is considered reasonable to use this figure for the purposes of relating the proposals back to the CBRE estimate of capacity. It is expected therefore that the proposed convenience floorspace would generate an annual turnover of £21.1m in 2021, as shown in Table 5.1 below.

- 5.8 Based on the CBRE estimate of sales per sq.m for comparison goods (£4,932 in 2021) in new comparison goods shops it is expected that the proposed comparison floorspace within the superstore will generate a comparison turnover of £5.5m in 2021, as shown in Table 5.1 below.

Table 5.1 Turnover of Superstore

Retail Type	Sales Area Floorspace Sq.m	Sales Density At 2021 £ per sq.m	Turnover at 2021 £m p.a.
Convenience	1,672	12,600	21.1
Comparison	1,115	4,932	5.5
Total	2,787	-	26.6

- 5.9 For the retail warehousing, based on the CBRE estimate of sales per sq.m for comparison goods (£4,932 in 2021) in new comparison goods shops it is expected that the proposed comparison floorspace of the retail warehousing within the scheme will generate a comparison turnover of £25.7m in 2021, as shown in Table 5.2 below.



Table 5.2 Turnover of Retail Warehousing

Retail Type	Sales Area Floorspace Sq.m	Sales Density At 2021 £ per sq.m	Turnover at 2021 £m p.a.
Comparison	5,201	4,932	25.7
Total	5,201	4,932	25.7

### Catchment Area of the Application Scheme

5.10 The primary catchment area of the scheme has been defined based on Zone 1 of the CBRE Retail Study 2010 Update. Taking into account the location of the application site in relation to surrounding foodstores, retail warehouses and other centres, and the drive-times to the surrounding areas, it is considered that Zone 1 of the CBRE study areas represents an appropriate primary catchment area for the application scheme. A plan of the CBRE 2010 Study Area identifying the different zones is attached as Plan 1.

5.11 The main centre within the primary catchment area of the proposed scheme is Banbury Town Centre. A number of local shopping centres are also located within the catchment area mainly in Banbury, but also including some of the villages. Local centres fulfil a key role in meeting the day to day shopping needs of local residents and it is not considered that this role will be affected by the proposed scheme. It is

therefore considered appropriate to focus the assessment of impacts on Banbury town centre and other non-central stores in the Banbury area. This is on the basis that superstores and retail warehouses primarily trade against each other. These retail formats are not normally replicated in villages.

## **Impact Assessment**

### **Retail Capacity**

- 5.12 In this section consideration is given to the retailing context within the Banbury area (the main catchment area for the proposal), including consideration of the Council's own recent evidence base documents looking at retail matters prepared by CBRE.

The CBRE Retail Study 2010 Update provides an up to date assessment of non central retail floorspace capacity i.e. these areas excluding Banbury Town Centre, Bicester Town Centre and Kidlington Village Centre. The Study sets out at Table 5.15 that the estimated net convenience capacity for new convenience sales floorspace (sq.m net) in the entire study area is 16,074 sq.m at 2021. The Study comments in paragraph 5.66 that:

*"Our assessment shows that a number of Non Central foodstores are over trading. It is when reducing the overtrading to company averages that the subsequent capacity shown in Table 5.15 is created. If no such allowance was made and if these stores continue to overtrade, the convenience capacity would be reduced to 1,331sq.m net at 2011; 5,998 sq.m net at 2016; 11,380 sq.m at 2021 and 18,068 sq.m at 2026. However, in order for this convenience*

*floorspace to cease overtrading and return to company averages (as shown in Table 5.15), significant town or edge of centre retail development would be required, clawing back expenditure leaking from the town centre. Such centre or edge of centre retailing is not envisaged at this time and therefore we recommend that the issue of overtrading is treated with caution".*

5.13 It is clear therefore that CBRE estimate a range of capacity for new non central convenience floorspace exists at 2021 between 11,380 – 16,074 sq.m, depending on whether overtrading is taken into account. The application proposal is for 1,672 sq.m of convenience net floorspace which represents between 10.4% - 14.7% of available capacity for new convenience floorspace in non central locations at 2021 in the overall Study Area

5.14 For Banbury Zone1 as identified in Table 13 of the CBRE Study 2010, the increase in non central convenience goods retail sales 2007 – 2021 is estimated to be £40.3m. At an average sales per sq.m net in new shops of £12,600 per sq.m, this would equate to a capacity for new sales non central convenience floorspace of 3,198 sq.m. It is expected that about 70% of the turnover of the proposed new foodstore at the Kraft site will be drawn from residents located within Zone 1, therefore the scheme will draw £14.77m of convenience trade from residents within the catchment area. Given the scale of additional capacity available within this area (£40.3m) it is considered that there is a need for this new floorspace. This analysis does not include any capacity for new convenience retail sales floorspace in Banbury Town Centre, where CBRE identify a separate capacity for the town centre additional retail.

- 5.15 For comparison goods the CBRE Retail Study 2010 Update also provides an up to date assessment of non central retail capacity in the wider Study Area. The Study sets out at Table 5.16 that the estimated net comparison goods capacity for new non central shop floorspace (sq.m net) in the entire Study Area is 33,343 sq.m at 2021.
- 5.16 The application proposal includes provision for 6,316 sq.m of comparison net floorspace which represents between 18.9% of available capacity for new non central comparison floorspace at 2021 in the overall Study Area
- 5.17 In Banbury Zone 1 as identified in Table 13 of the CBRE Study 2010, the increase in comparison goods retail sales in non central stores 2007 – 2021 is estimated to be £68.3m. At an average sales per sq.m net in new shops of £4,932 per sq.m at 2021 (CBRE Table 14), this would equate to a capacity for new sales non central comparison floorspace of 13,843 sq.m.
- 5.18 It is expected that the majority of the turnover (65%) of the proposed new retail warehouses and the comparison element of foodstore at the Kraft site will be drawn from residents located within Zone 1, therefore the comparison goods element of the scheme will draw £20.28m of comparison trade from residents within the catchment area. Given the scale of additional capacity available within this area (£68.3m) for non central areas it is considered that there is a need for this new floorspace. As above this analysis does not include any spare capacity for new comparison floorspace in Banbury Town Centre.



- 5.19 Although PPS4 makes clear that it is not necessary for an applicant to demonstrate a quantitative need, it is important to note that the above assessments of capacity for non central floorspace are based on the Council's own evidence base and suggest that there is substantial scope for the proposal as well as other planned and windfall development. Indeed, it is noted that the only non central commitment for convenience or comparison retails sales floorspace in the entire CBRE Study Area is the 1,674 sq.m net comparison floorspace for the consented Sainsbury's extension on Oxford Road, Banbury granted consent in February 2010. In this context, it is considered that development for the prepared comparison floorspace in the superstore and retail warehouses should be permitted , subject to appropriate controls over the form and use of floorspace. Indeed, this would be consistent with the findings of the CBRE 2010 Study.

### **Retail Impact**

- 5.20 Consideration is now given to the impact of the scheme against each of the six impacts specified by Policy EC 16.1 of PPS4 focussing on Banbury Town Centre.

#### **1. Impact on Existing, Committed and Planned Public and Private Investment in a Centre or centres in the Catchment Area of the Proposal**

- 5.21 There has been very little new investment in retail floorspace in Banbury Town Centre in recent years. Currently, there are no committed convenience retail schemes



in the Town Centre that have yet to be implemented. The same applies to comparison floorspace in the Town Centre.

5.22 Consideration has been given to the Bolton Road scheme on the basis that it is the subject of a draft SPD. This scheme is located on the northern edge of the town centre and is at the early stages of scheme formulation. In a recent e-mail (27<sup>th</sup> February 2012) from Cherwell District Council to Framptons, the Council confirmed that the Bolton Road scheme is a long term scheme. Any scheme is likely to require assembly of fragmented land interests. CPO may be necessary and so far there is no resolution by Cherwell District Council to use CPO Powers. The scheme as portrayed in the draft SPD includes the potential for both new convenience and comparison floorspace provision. The CBRE 2010 Study identifies a capacity for new convenience floorspace in Banbury Town Centre of 1,467 sq.m at 2021(CBRE Table 5). This is additional to any estimate of capacity for non central convenience retailing. On this basis it is considered that there is sufficient capacity to accommodate new convenience retail floorspace at both Bolton Road and the Kraft site. Consequently, it is considered that the convenience proposals for the Kraft site will not have a negative impact on the Bolton Road site coming forward for development at some future stage.

5.23 Additionally, the CBRE 2010 Study identifies a capacity for new comparison floorspace in Banbury Town Centre of 36,091 sq.m. at 2021 (CBRE Table 5). This is additional to any estimate of capacity for non central comparison floorspace. On this basis it is considered that there is sufficient capacity to accommodate new comparison floorspace at both Bolton Road and the Kraft site. Consequently, it is considered that

the comparison proposals for the Kraft site will not have a negative impact on the Bolton Road site coming forward for development at some future stage.

- 5.24 As regards the Canalside site on the eastern side of the Town centre, these proposals are at an early stage of development and it is not known whether the intention is to include any convenience retailing. It does however seem unlikely that this scheme will include any such provision and therefore the Kraft site convenience proposals are considered not to have an adverse impact on the Canalside site. As regards comparison floorspace, the scale of potential capacity to accommodate new comparison floorspace in both Banbury town centre and in non central stores is sufficient to conclude that the Kraft site proposals will not have a negative impact on the Canalside scheme coming forward for development at some future stage.

## **2. Impact on Town Centre Vitality and Viability, including Local Consumer Choice.**

- 5.25 Assessments of the performance of Banbury Town Centre against a number of indicators were undertaken by CBRE in 2006. The 2010 Update Study did not specifically include a review of these matters, however the Study did include a comprehensive review of the Bolton Road scheme commenting (at paragraph 6.37) that *"the Bolton Road site would have the capacity to accommodate a mixed use retail and leisure led scheme. If the scheme can be appropriately designed, then it has the potential to integrate well with the core of the town centre offer, and create a new retail/leisure circuit"*.

- 5.26 CBRE's appraisal of the potential of the Bolton Road scheme was made in the context of an assessment the capacity for new convenience and comparison retail floorspace in Banbury Town Centre and in non central stores. No comment is made such that non central comparison floorspace should be restricted or limited.

### **3. Impact on Allocated Sites outside Town Centres**

- 5.27 There are no sites allocated for retail floorspace by the saved policies of the Local Plan outside of Banbury Town Centre within the catchment area. The application scheme will not therefore have an adverse impact on the delivery of any allocated site.

### **4. Impact on In-centre Trade/Turnover and on Trade in the Wider Area**

- 5.28 An assessment has been undertaken of the likely impacts of the proposed scheme on the trade/turnover of existing centres and stores located within and beyond the catchment area. The primary assessment considers in turn the impacts of the proposed convenience and comparison impact of the application scheme.
- 5.29 Before providing details of the impacts that have been identified, it is important to briefly outline the methodology employed for the assessment of trade draw. The assessment of trade diversion impacts follows a standard step-by-step methodology, which can be summarised as follows:



1. Estimate the convenience and comparison goods turnover of the application scheme that will be drawn from the residents of the Study Area.
2. It is known from the CBRE study that there are no unimplemented convenience retail commitments within the Study Area. The only substantive comparison goods commitment is the extension of the Banbury Sainsbury at Oxford Road.
3. Undertake an assessment to identify where the turnover of the application scheme is most likely to be diverted from. This allocation between centres has been determined with regard to: the type of floorspace proposed and the services offered relative to competing stores; the location and accessibility of the proposal relative to other stores and centres; and the existing patterns of spend revealed by the CBRE 2010 Study. In this respect, the Study Area is that formulated by CBRE and as far as possible all assumptions about population, expenditure and floorspace growth have been taken from the CBRE Study as this provides the evidence base for the emerging local development framework. The estimates of the trade diversion from each of the existing centres in the Study Area are set out in the Tables included within Appendix A.
4. The resultant trade diversions are expressed as a proportion of the constant market share turnovers that are assumed to be achieved by the various centres, under a no development scenario, and assuming that each centre would benefit from expenditure growth in line with its existing market share as estimated by CBRE.



### Impact of the proposed convenience floorspace

- 5.30 The proposed scheme includes a food superstore, which will provide 1,875 sq.m of convenience sales floorspace. As explained earlier in this section, it is expected that the scheme will generate a convenience turnover of £21.1m by 2021, of which £14.77m will be drawn from Zone 1 of the study area.
- 5.31 The anticipated pattern of convenience trade diversion is set out in Table 2 in Appendix A. The greatest convenience trade draw to the proposed foodstore is likely to be from existing, nearby food superstores and large supermarkets in Banbury, because the offer of these stores is closely comparable to the proposed foodstore. In particular, residents who currently travel to the north of Banbury to visit the out-of-centre Tesco at Lockheed Close, the Sainsburys at Oxford Road and the Morrisons east of the town centre, may now choose to visit the similar-sized food superstore proposed at the application site. A summary of the main trade diversion impacts is provided in Table 3 in Appendix A. The principal non central foodstores within Banbury and their estimated turnovers as identified by CBRE in the 2006 Study are as follows:

Store	Net Sales Floorspace Sq.m	Convenience Floorspace Sq.m	Sales Density £/sq.m	Sales £m
Sainsbury Oxford Road	4,146	3,192	9,662	30.8
Tesco Lockheed Close	4,667	2,987	13,513	40.4
Aldi Ruscote Ave	743	617	4,167	2.6
Alldays Ruscote Arcade	171	154	3,476	0.6
Alldays Middleton Road	180	162	3426	0.6
Morrisons	2,338	1,800	11,795	21.2
Total	12,245	8,912		96.2

5.32 It is anticipated that the highest diversion of trade will be from the existing, similar-sized out of centre superstores in Banbury. The Tesco at Lockheed Close, the Morrisons and the Sainsbury at Oxford Road are expected to experience trade diversions of £6.2m, £3.3m and £4.7m, respectively, which equates to impacts of about -15 per cent for each store assuming no increase in floorspace efficiency since 2006. On the basis that it is recognised by CBRE that the foodstores within the study area are significantly overtrading it is considered that this level of impact is relatively modest and represents a worse case scenario.

5.33 The impact of the application scheme on existing foodstores in Banbury Town Centre is likely to be focussed on the M&S, Tesco Express, Iceland and Farm Foods Store. It is noted that since 2006 the Somerfield that was previously in the town centre has

been lost. It is estimated that overall trade diversion would amount to about £2.11m in the town centre at 2021. In overall terms this is relatively modest, given that CBRE has estimated that there is additional capacity of about £18.5m by 2021 to support new convenience floorspace in Banbury Town Centre. On this basis it is considered that the impact on existing stores in the town centre will be modest and there remains sufficient capacity to accommodate emerging proposals for the Bolton Road site which may include a foodstore.

- 5.34 The three largest foodstores in Banbury anticipated to experience the highest trade diversions and impact are out-of-centre and benefit from no policy protection from PPS4.
- 5.35 It is also notable that the all three major foodstore in Banbury are currently performing strongly, as acknowledged by CBRE.
- 5.36 The application scheme will also have an impact on the small foodstores located in relatively close proximity to the application site. The Aldi at Ruscote Drive and the two Alldays (Co-Op) stores at Ruscote Arcade and Middleton Road are anticipated to experience a trade impact of -5 per cent. It is considered, that the viability of these three stores will not be materially threatened by the application scheme. Each of these stores has an important role to play in meeting the 'top up' food and grocery needs of the local residents in Banbury and the stores will continue to perform this role and function.

- 5.37 The application scheme may also divert trade and have some impact on other foodstores located throughout the Study Area and beyond, particularly the larger ones. Sainsbury at Kidlington and the Shires Retail Park in Leamington Spa, the Sainsbury under construction in Bicester Town Centre, Tesco at Aylesbury, Bicester, Buckingham, Brackley and Southam. All of these stores have an important role to play in meeting the food and grocery needs of the local residents in the wider area but it is considered that the relatively small level of trade diversion to the proposed foodstore will not undermine the viability of these stores.
- 5.38 It is not considered that a material proportion of the convenience turnover of the proposed superstore will be diverted from other existing convenience traders in Banbury Town Centre. All of these units are small and several serve a specialist market, providing take-away sandwiches, health food, or confectionary, and will not compete directly with the proposed superstore (for example, Greggs, Druckers, the Cornish Pasty Shop, Holland & Barrett and Thorntons). Whilst there is a number of specialist grocers (Thai and Polish goods), butchers, green grocer, bakeries and several newsagents, these retailers already successfully compete with large-format supermarkets and superstores in the town and it is considered that the stores will similarly be able to trade alongside the proposed foodstore scheme, with the specialist and/or independent offer complementing the main food products available in the new store.



- 5.39 Similarly, the other convenience retail units in the wider Banbury area are small, and fulfil an important role providing 'top-up' and specialist food shopping provision that will not be materially threatened by the application scheme.
- 5.40 In summary, it is considered that the proposed scheme will not have a significant detrimental impact on any of the existing in-centre and out-of-centre convenience stores in the catchment area.

### **Cumulative impact**

- 5.41 There are no extant permissions for foodstores in the District, and it is unnecessary to take account of the cumulative impact in our assessment.

### **Comparison Impact**

- 5.42 The proposed superstore will contain 1,115 sq.m of non-food floorspace, which will be likely to be used for the sale of health and beauty products, small household goods, clothing, pet food, toys, stationery, books, CDs and DVDs. As explained earlier in this section, it is expected that the foodstore part of the scheme will generate a comparison turnover of £5.5m by 2021, of which £3.6m will be drawn from the Zone 1 of the Study Area.
- 5.43 As regards the retail warehouse component of the scheme, this contains upto 5,201 sq.m. of net sales floorspace. This is likely to be used for a traditional retail

warehouse mix of uses that one would expect to find at an out of town retail warehouse location – for example:

- Housewares;
- Fabrics and floor coverings;
- Leisure and sports goods;
- Chemists and health goods;
- Home technology and electrical goods (including audio-visual, cameras, computer equipment, and telecommunications);
- DIY goods;
- Plants, garden products and outdoor furniture;
- Pet care products;
- Kitchens

5.44 It is expected that the retail warehousing part of the scheme will generate a comparison turnover of £25.7m by 2021, of which £16.7m will be drawn from Zone 1 of the Study Area. The assessment anticipated pattern of comparison trade diversion combines the foodstore and retail warehouse proposals into a single element and the conclusions are set out in the Tables in Appendix B.

- 5.45 In general terms the anticipated impact on any individual centre is expected to be minimal. As may be expected, it is considered likely that the main diversion of trade will be from retail warehouses in Banbury.
- 5.46 Banbury Town Centre has been identified by CBRE as being the main destination for comparison goods retailing in Cherwell District. It contains a large number of national multiple and other retailers offering the types of products that will be available at the proposed Kraft site. Overall, it is estimated that Banbury Town Centre will experience a trade diversion of £12.17m, which equates to a trade impact of -2.3 per cent.
- 5.47 We also expect that the application scheme will divert a small proportion of trade from comparison stores in Bicester and Kidlington Town Centres. However, the comparison retail offer in both of these centres is much more limited than in Banbury, and there is less overlap with the product offer at the proposed Kraft site. In Bicester, the comparison retail offer is focused on small independent and specialist operators at the lower to middle end of the market, which provide a significantly different retail offer to that available at the proposed Kraft site. Whilst there will be some overlap between the application scheme and the existing shops in Bicester, it is therefore considered that the trade diversion from the centre will be limited. The comparison retail offer in Kidlington is also small scale and caters primarily for the local comparison shopping needs of local residents. It is therefore considered that the comparison trade diversion from Kidlington will also be limited. Overall, we expect that around £3.3m and £0.9m of comparison trade will be diverted from Bicester and

Kidlington Town Centres, respectively, equating to a trade impact of -2 per cent at Bicester and -1.5 per cent at Kidlington.

- 5.48 It is considered that the levels of impact identified will not materially undermine the current performance of Banbury, Bicester or Kidlington Town Centres. It is therefore anticipated that any impact will be dispersed thinly across a wide range of stores, with no individual store experiencing any material trade diversion. In any event retail planning policy is not intended to protect against competition between individual stores. It is also expected that the proposed scheme will divert some trade from out-of-centre operators retailing similar products nearby. This amounts to about £10.0m within Banbury. As an illustration of the effect of this, the CBRE 2006 Study estimated that the non central sales capacity of stores in Banbury (including the comparison part of existing foodstores) was £126.5m. Even if there had been no growth in sales density at these stores the Kraft proposals would represent an impact of - 8 per cent. It is considered that this level of trade diversion will not undermine the performance of non central comparison shopping in Banbury.
- 5.49 The introduction of new comparison floorsapce at the Kraft site is also likely to claw back some of the large amount of trade currently leaked to a wide variety of destinations outside of Banbury, and this will offset the level of trade that is likely to be drawn from operators within town itself. It is considered that the impacts experienced by any individual location or store outside of the District will be modest and that the proposed floorspace will provide healthy competition to such operators.



## **5. Whether the Proposal is of an Appropriate Scale**

- 5.50 Policy EC16.1 of PPS4 explains that it is necessary to consider whether a proposal is of an appropriate scale in relation to the size of the centre and its role in the hierarchy of centres if the application site is located 'in or on the edge of a town centre'. This test is not, therefore, relevant to the current application, which concerns an out-of-centre site. In any event it is considered that the proposal is of an appropriate scale to Banbury given the town's role in the hierarchy of centres.

## **6. Locally Important Impacts**

- 5.51 Policy EC 3 of PPS4 sets the context for the assessment of application schemes against 'locally important impacts' and explains that local planning authorities, when formulating development plan strategies should 'define any locally important impacts on centres which should be tested'. However, as such local impacts are not defined by Cherwell District Council, this test is not applicable.

## 6.0 SUMMARY OF FINDINGS AND OVERALL CONCLUSIONS

### **Assessment of the Impacts Specified under Criteria (d) and (e) of Policy EC 10.2 of PPS4.**

- 6.1 Other document forming part of the application material address the requirements of the first three criteria of Policy EC10.2 of PPS4. In relation to criteria (d) and (e) of Policy EC10.2, this report has demonstrated that there will be no significant adverse impacts arising from the proposed development. Indeed, the proposed development will deliver a range of positive local economic and employment impacts. The scheme will represent significant investment in Banbury, and will improve access to a range of key facilities and create a substantial number of new jobs which is particularly pertinent given that the Ruscote SOA is amongst the top 20 per cent most deprived SOAs nationally.
- 6.2 Accordingly, it is concluded that the proposed development satisfies the requirements of criteria (d) and (e) of PPS4 Policy EC10.2.

### **Assessment of the Impacts Specified under Policy EC16.1 of PPS4**

- 6.3 The application scheme will not undermine the investment prospects of Banbury Town Centre, or any other centre. Furthermore, the proposed scheme will not adversely affect the development prospects of any town centre, edge of centre or out-of centre site that is either allocated for redevelopment or proposed for allocation.

This report demonstrates that the application scheme will not have a materially adverse impact on the vitality and viability of any defined centre. Instead, it is considered that the proposed development will improve local consumer choice, and the range and quality of the retail offer available locally.

- 6.4 The impact assessment shows that the proposed scheme can be expected to divert some trade from existing retailers in Banbury. The impacts identified are not at a level that will undermine the viability of any individual stores, or the vitality and viability of the centre as a whole. This is the case when the proposed scheme is considered on its own, and when it is considered cumulatively with extant retail commitments. The application scheme is of an appropriate scale given the size and role of Banbury. The role of retail planning policy is not to prevent competition with individual stores or to deter choice.
- 6.5 Accordingly, it is considered that the proposed scheme satisfies the six impact criteria that are set out in Policy EC16.1 of PPS4.

#### **Assessment of the Application Against Policy EC17 of PPS4**

- 6.6 The assessment has demonstrated that the proposed development will not result in any significant adverse impacts in terms of criteria (d) and (e) of Policy EC10.2, or any of the impact criteria set out under Policy EC16.1. It has also been demonstrated separately that the scheme satisfies the requirements of Policy EC15 of PPS4 (the sequential approach).

- 6.7 As no significant impacts have been identified under Policies EC10.2 and EC16.1, Policy EC17.2 of PPS4 advises that the application scheme should be determined by taking into account the positive and negative impacts of the proposal (in terms of Policies EC10.2 and EC16.1) and any other material considerations.
- 6.8 It is considered that the substantial positive benefits associated with the application scheme – including the significant number of new jobs that will be created, and the widening of consumer choice – considerably outweigh the modest trade diversion impacts that have been identified.

### **Conclusion**

- 6.9 The proposed development at Southam Road in Banbury will deliver a food superstore, alongside a range of retail warehouses. The scheme will not result in any significant adverse impacts in terms of criteria (d) and (e) of Policy EC10.2, or any of the impacts set out under Policy EC16.1. The application scheme will deliver a range of benefits that considerably outweigh the limited impacts of the scheme. It is concluded therefore that there are no retail policy grounds on which to resist the application.

**Our Ref: PF / 8817**

**March 2012**



## APPENDIX A

### Forecast Retail Sales in Centre by Catchment Zone – Convenience Goods

## APPENDIX A

TABLE 1 - Forecast Retail Sales in Centre by Catchment Zone

CONVENIENCE GOODS

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9
	Banbury	Bicester	Chipping Norton	Moreton in Marsh	Southam	Daventry/Towcester	Brackley	Long Crendon	Kidlington
Banbury TC									
	28.4	0	1.7	0	0.8	0	0	0	1.3
Bicester TC									
	0.99	52.49	0	0	0	0	1.15	0.68	2.52
Kidlington TC									
	0	0	0.3	0	0	0	0	0	48.9
Non Central									
	174.2	70.3	49	36.8	18.5	146	47.4	2.3	92.6
Total Available Expenditure	203.59	122.79	51	36.8	19.3	146	48.55	2.98	145.32

TABLE 2 - Trade Draw and Market Share Analysis

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	IMPACT %
	Banbury	Bicester	Chipping Norton	Moreton in Marsh	Southam	Daventry/Towcester	Brackley	Long Crendon	Kidlington	
Kraft Scheme										
Trade Draw %	70.00	10.00	2.00	2.00	5.00	2.00	5.00	2.00	2.00	
Trade Draw £m	14.77	2.11	0.42	0.42	1.06	0.42	1.06	0.42	0.42	
Mkt Share %	7.25	1.72	0.82	1.14	5.49	0.29	2.18	14.09	0.29	
Banbury TC										
%	10.00	0.00	0.20	0.00	1.00	0.00	1.00	0.40	0.10	
£m	2.11	0.00	0.04	0.00	0.21	0.00	0.21	0.08	0.02	8.32
Bicester TC										
%	0.00	2.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10	
£m	0.00	0.42	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.77
Kidlington TC										
%	0.00	0.00	0.20	0.00	0.00	0.00	0.00	0.00	0.20	
£m	0.00	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.04	0.17
Non Central										
%	60.00	8.00	1.60	2.00	4.00	2.00	4.00	1.60	1.60	
£m	12.66	1.69	0.34	0.42	0.84	0.42	0.84	0.34	0.34	2.81

## APPENDIX B

### Forecast Retail Sales in Centre by Catchment Zone – Comparison Goods



## APPENDIX B

TABLE 3 - Forecast Retail Sales in Centre by Catchment Zone

Zone	COMPARISON GOODS								
	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9
	Banbury	Bicester	Chipping Norton	Moreton in Marsh	Southam	Daventry/Towcester	Brackley	Long Crendon	Kidlington
Banbury TC									
	314.4	63.6	51.7	19.9	24.8	12.3	19	0	32.8
Bicester TC									
	1.5	129.3	0.7	0	1.2	2	3.2	4.7	24.2
Kidlington TC									
	1.2	0	0.9	0	0.9	6.4	0	0	53.5
Non Central									
	158.1	66.1	47.9	38.7	5.2	122.8	56.1	4.8	30
Total Available Expenditure	475.2	259	101.2	58.6	32.1	143.5	78.3	9.5	140.5

TABLE 4 - Trade Draw and Market Share Analysis

Zone	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9	IMPACT %
	Banbury	Bicester	Chipping Norton	Moreton in Marsh	Southam	Daventry/Towcester	Brackley	Long Crendon	Kidlington	
Kraft Scheme										
Trade Draw %	65.00	10.00	3.00	3.00	5.00	5.00	5.00	2.00	2.00	
Trade Draw £m	20.28	3.12	0.94	0.94	1.56	1.56	1.56	0.62	0.62	
Mkt Share %	4.27	1.20	0.93	1.60	4.86	1.09	1.99	6.53	0.44	
Banbury TC										
%	31.00	2.00	1.00	1.00	2.50	0.25	0.75	0.00	0.50	
£m	9.67	0.62	0.31	0.31	0.78	0.08	0.23	0.00	0.16	2.26
Bicester TC										
%	1.00	6.00	0.50	0.00	1.00	0.25	0.25	1.00	0.50	
£m	0.31	1.87	0.16	0.00	0.31	0.08	0.08	0.31	0.16	1.97
Kidlington TC										
%	1.00	0.00	0.50	0.00	0.50	0.50	0.00	0.00	0.50	
£m	0.31	0.00	0.16	0.00	0.16	0.16	0.00	0.00	0.16	1.49
Non Central										
%	32.00	2.00	1.00	2.00	1.00	4.00	4.00	1.00	0.50	
£m	9.98	0.62	0.31	0.62	0.31	1.25	1.25	0.31	0.16	2.80

## PLAN 1

### CBRE 2010 Study Area

## Study Area Map

