Planning Potential

Retail Assessment

Land at Southview Farm, Drynham Road, Trowbridge

Coulston Estates Limited



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Executive Summary

This Retail Assessment has been prepared by Planning Potential, on behalf of Coulston Estates Limited, in support of a planning application for the demolition of the existing disused barns, the conversion and extension of the existing farmhouse for office and nursery space at ground floor and retained residential use at first floor, the erection of a convenience store, and associated access, parking, and landscaping on land off Drynham Road in Trowbridge.

The site is situated within the administrative control of Wiltshire Council, and is located at Southview Farm on Drynham Road, to the south of Trowbridge. The existing buildings on the site are vacant and include the Grade II Listed Southview Farmhouse, a domestic garage, and two redundant stone barns. The remainder of the site consists of areas of hardstanding and vegetation, which appears to include a mix of trees, grassland, and scrubland areas.

The retail element of the proposed development comprises the construction of a new single storey 349 sq. m (GEA) convenience store. The retail sales area is proposed to be 243 sq. m (GEA) with a back of house area proposed to be 106 sq. m (GEA).

Sequential and retail impact assessments have been carried out to address the requirements of both national and local retail planning policy, specifically the criteria set out in Policy 38 of the Wiltshire Core Strategy, and Paragraphs 87, 88, and 90 of the National Planning Policy Framework.

The sequential assessment considers and analyses possible alternative sites within Trowbridge, and well as sites in edge of centre and other out of centre locations. The assessment demonstrates that the application site is the most sequentially preferable, and the sequential test is passed.

The retail impact assessment has robustly assessed the potential for the proposal to cause significant adverse impacts upon the overall vitality and viability of Trowbridge town centre, in addition to existing, committed, or planned investment within the centre. The assessment demonstrates that the anticipated level of impact on Trowbridge town centre is low, and the proposals do not result in significant adverse impacts. There are also no existing, committed, or planned proposals that will be impacted by the proposed development. It follows that there will be no adverse impacts on local investment.

On the basis of the consideration of the proposals set out in this Retail Assessment (and other supporting documents), we consider that the application proposals represent appropriate development and comply with relevant retail planning policy at all levels.

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1. Introduction

1.1. This Retail Assessment has been prepared by Planning Potential, on behalf of Coulston Estates Limited, in support of a planning application for the demolition of the existing disused barns, the conversion and extension of the existing farmhouse for office and nursery space at ground floor and retained residential use at first floor, the erection of a convenience store, and associated access, parking, and landscaping on land off Drynham Road in Trowbridge.

1.2. This report provides a Health Check Assessment of Trowbridge Town Centre, a Sequential Assessment, and a Retail Impact Assessment associated with the 349 sq. m (GEA) of retail floorspace proposed as part of the scheme. The floorspace proposed is specifically identified for a convenience store (Use Class E).

Context

1.3. It is recognised that one of the principal planning issues associated with the planning application is the consideration of the potential impact on Trowbridge town centre and other relevant centres, and the consideration of the sequential test.

1.4. The convenience store would fulfil a neighbourhood shopping role, as well as attracting some customers from the surrounding area. It is considered there is considerable qualitative need for a new convenience store to serve the area, and that a store in this location will provide a valuable contribution towards the local convenience shopping provision, which is limited at present.

1.5. It is considered that this site represents an ideal location that will help provide competition and choice for the local market, facilitate local job opportunities, increase social inclusion, and reduce the need to travel, keeping spending local. Thereby supporting the local economy and helping to balance economic growth in the area.

Report Structure

1.6. This Assessment is set out as follows:

- Section 2 – Summarises the site context, relevant planning history, and the development proposals.
- Section 3 – Sets out the retail policy context and town centre health check assessment.
- Section 4 – Sets out the sequential assessment.
- Section 5 – Sets out the retail impact assessment; and
- Section 6 – Presents our summary and conclusions.

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2. Site Context

Site Context

2.1. The site is situated within the administrative control of Wiltshire Council, and is located at Southview Farm on Drynham Road, to the south of Trowbridge. The existing buildings on the site are vacant and include the Grade II Listed Southview Farmhouse, a domestic garage, and two redundant stone barns. The remainder of the site consists of areas of hardstanding and vegetation, which appears to include a mix of trees, grassland, and scrubland areas.

2.2. It is understood that Southview Farmhouse was last occupied in 2015. The condition of the farmhouse and the stone outbuildings have significantly deteriorated and as such, a full repair and conversion to a single residential dwelling is unviable, and the stone barns are now passed the point of repair / reinstatement. Furthermore, Agents have advised that there would be low demand for a refurbishment of Southview Farmhouse due to a combination of its poor condition and location.

2.3. The site extends to approximately 0.42 ha and is bound by the Cardiff-Portsmouth railway line to the east, Drynham Road to the west, and existing 1970s and 1980s suburban residential development to the north and further to the west. Agricultural land associated with Southview Farmhouse is to the south.

2.4. The site is accessed via Drynham Road, with further access provided via Southview Road and Wiltshire Drive to the west. Bus facilities are available on Southview Road to the west and further to the north on Drynham Road. There does not appear to be any public footpaths passing through the site, but a network of pavements is provided on surrounding streets.

Planning History

2.5. We are aware there have been a number of planning applications relating to this and neighbouring land in relation to the wider Elm Grove site. The most relevant to the proposed development is set out below.

- Ref. 19/11459/OUT – Erection of up to 261 dwellings following the demolition of Elm Grove Farmhouse, erection of multi-use community facility (Class F), strategic landscaping, access and drainage works, and demolition of redundant former agricultural outbuildings – outline planning permission granted 31st October 2022.
- Ref. PL/2021/04087 – Proposed demolition of Elm Grove Farmhouse and associated agricultural buildings – prior notification approval 13th May 2021.
- Ref. PL2022/09425 – Demolition of existing buildings and structures and construction of 247 homes, changing rooms, playing pitches, allotments, areas of open space, upgrading of existing play area, sustainable drainage infrastructure, internal roads, paths and parking areas, landscaping and associated works, plant, and infrastructure (Reserved Matters Application pursuant to 19/11459/OUT - relating to appearance, landscape, layout, and scale) – under consideration by Wiltshire Council.

Proposed Development

2.6. The proposed development consists of the demolition of the existing disused stone barns, the conversion and extension of the existing farmhouse to form a co-working hub and children's nursery at ground level (Class E) and a single residential apartment at first floor (Class C3), the erection of a convenience store (Class E), and associated access, parking, and landscaping.

2.7. In regard to parking, 12 dedicated surface level car parking spaces are proposed for the convenience store, including 2 accessible spaces. There are six car parking spaces proposed for the co-working hub, one for the residential unit, and three for the nursery/community space. A dedicated lorry turning zone for vehicles to access the site and service the convenience store is also proposed.

2.8. The retail element of the proposed development comprises the construction of a of a new single storey 349 sq. m (GEA) convenience store. The floorspace of the retail sales area is proposed to be 243 sq. m (GEA) and floorspace of the back of house area is proposed to be 106 sq. m (GEA).

2.9. The new convenience store references the form and materials of the existing derelict barns on site. The new convenience store is proposed to be built in a similar location to the existing derelict barn, although pushed further back into the site to allow some separation from the existing street.

2.10. Further details of the proposed development are outlined in the Design and Access Statement, and the plans and drawings submitted with the application.

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3. Retail Policy Context and Town Centre Health Check Assessment

3.1. The following section provides a summary of the national and local planning policies that are relevant to the consideration of the sequential and retail impact tests. It also sets out the results and a summary of the Health Check Assessment that has been undertaken for Trowbridge town centre.

Retail Policy Context

3.2. The principal policies for assessing town centre and retail uses are set out in Paragraphs 86 – 91 of the National Planning Policy Framework (NPPF) adopted in July 2021. It is stated that retail centres are the preferred location for new development. The NPPF 2021 (Annex 2) also confirms that references to 'town centres' relate to all designated centres (e.g. town centres, district centres and local centres).

3.3. Paragraph 87 of the National Planning Policy Framework (2021) states that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.

3.4. Core Policy 38 (Retail and Leisure) of the Wiltshire Core Strategy (2015) advises that proposals for retail use outside of designated centres will only be supported if it is demonstrated that the proposal passes the sequential test.

3.5. The site is not within an existing centre and, therefore, it is acknowledged that a sequential assessment is required in this case.

3.6. Where proposals for 'town centre uses' (including retail) are not located within existing centres, which are not in accordance with an up-to-date plan, Paragraph 90 of the NPPF requires proposals, if over 2,500 sq. m, to consider potential impacts of the development (unless there is a lower locally set threshold). Only where a proposal fails to comply with the sequential test or would have significant adverse impact should permission be refused. This is an important consideration.

3.7. Policy CP38: Retail and Leisure, of the Wiltshire Core Strategy (2015) states that all proposals for retail or leisure uses on sites not within a town centre in excess of 200 sq. m gross floorspace, including extension of existing units, must be accompanied by an impact assessment which meets the requirements of national guidance and established best practice, and demonstrates that the proposal will not harm the vitality or viability of any nearby centres.

3.8. The scale of the proposed convenience store (349 sq. m) falls well below the threshold for (retail) impact assessments (2,500 sq. m) identified at Paragraph 90 of the NPPF. Policy CP38: Retail and Leisure, of the Wiltshire Core Strategy (2015), however, outlines that sites of over 200 sq. m will require an (retail) impact assessment. In this case, an impact assessment is, therefore, required for the proposal.

3.9. Impact assessments should relate specifically to impacts on existing, committed and planned public and private investments, and impacts on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.

3.10. The assessment has been based upon published information found in the Wiltshire Core Strategy (2015) and Wiltshire Retail Study (2020), which forms the most up to date retail evidence base for the Council.

3.11. Retail facilities are an important component of everyday life and, whilst existing centres may be a preference, this may not always be possible owing to a number of factors. Where the sequential approach is satisfied and potential impacts would not be 'significantly adverse', the NPPF accepts the principle of new retail floorspace in non-town centre locations, including where they are in edge-of-centre, out-of-centre, and out-of-town locations. The fact a retail application does not fall within or relate to a town centre location is not, therefore, a default reason to refuse planning permission.

Town Centre Health Check Assessment – Trowbridge Town Centre

Introduction

3.12. To assist in the consideration of the potential implications of the proposed store's development, we set out below a baseline assessment of the current health of Trowbridge town centre. Trowbridge town centre is a 'Principal Settlement', which falls within the highest tier of centres within the Wiltshire retail hierarchy and is located approximately 0.8 km north from the application site. We set out below an assessment of the current health of Trowbridge town centre to inform the assessment of retail impact, and to assist the Council in their decision making.

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3.13. The Health Check provides further commentary and evidence relating to relevant indicators of town centre vitality and viability set out in Paragraph 006 of the PPG. PPG Paragraph: 006 Reference ID: 2b-006-20190722 (Revision date: 22 07 2019) of the Government's Planning Practice states that the following indicators, and their changes over time, may be relevant in assessing the health of town centres, and planning for their future:

- Diversity of uses.
- Proportion of vacant street level property.
- Commercial yields on non-domestic property.
- Customers' experience and behaviour.
- Retailer representation and intentions to change representation.
- Commercial rents.
- Pedestrian flows.
- Accessibility – this includes transport accessibility and accessibility for people with different impairments or health conditions, as well as older people with mobility requirements.
- Perception of safety and occurrence of crime.
- State of town centre environmental quality.
- Balance between independent and multiple stores.
- Extent to which there is evidence of barriers to new businesses opening and existing businesses expanding.
- Opening hours/availability/extent to which there is an evening and night-time economy offer.

3.14. It should, however, be acknowledged and accepted that not all indicators are relevant to all cases, and it is not always possible to obtain information to address all of the suggested indicators. The Health Check for Trowbridge town centre has addressed as many of the indicators as possible with as much detail as is reasonably possible.

3.15. A GOAD Plan and a Goad Category Report for Trowbridge town centre has been obtained from Experian, which were compiled based on a survey on the 4th April 2022. This is the most up to date information from Experian.

3.16. In a site visit on the 6th June 2023, Planning Potential updated the GOAD information, as well as the relevant information contained in the Wiltshire Core Strategy (2015) and Wiltshire Retail Study (2020) and obtained relevant details to address the Health Check indicators.

3.17. The Health Check Assessment is outlined in **Appendix 2** a full and robust assessment, in order to inform the assessment of retail impact and assist the Council in their decision making.

Conclusion

3.18. It is considered that Trowbridge town centre is performing well and fulfils its role as a Principle Settlement. Indicators confirm that the centre is viable and resistant to change through a diverse mix of uses (including a good mix of multiple and independent businesses), and the centre is accessible by various modes of transport.

3.19. The town centre is environmentally attractive, with a low perception of crime, and the centre provides an offer both day and night for the local population. These attributes continue to attract local residents and visitors and demonstrate that the centre is a vital and vibrant location that is not vulnerable to retail impact.

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4. The Sequential Approach

4.1. This section of the Assessment considers the proposed development against the sequential test as outlined in the NPPF (2021) and the adopted Wiltshire Core Strategy (2015). The application site lies within an out of centre location. A sequential assessment has, therefore, been undertaken for this development proposal to address the requirements of Paragraphs 87 and 88 of the NPPF and Policy 38 of the Wiltshire Core Strategy (2015).

4.2. This assessment is based on information regarding the potential availability and suitability of alternative sites. The assessment has been informed by the Wiltshire Core Strategy (2015) and the Wiltshire Retail Study (2020), which form the most up to date policy and retail evidence base for the Council, and our own research.

4.3. The assessment has also been informed by the Trowbridge Town Centre GOAD Map and report data from Experian (2022), and the consideration of other recent and relevant planning application proposals.

4.4. Site visits were undertaken by Planning Potential in June 2023 to inspect and assess possible alternative sites within Trowbridge town centre, as well as the surrounding area, and to assist in determining whether any other alternative sites should be analysed.

4.5. The sites that we have considered worthy of further analysis are all within either town centre, edge-of-centre, or out-of-centre locations, and are set out in the 'Relevant Sequential Sites' section below and in **Appendix 3**.

Sequential Assessment - Parameters

4.6. Paragraph 87 of the NPPF and the PPG (Paragraph: 009 Reference ID: 2b-009-20190722 to Paragraph: 013 Reference ID: 2b-013-20190722) confirm that, in reviewing alternative sites, regard should be given to suitability, viability and availability of those sites. These are defined as follows:

- Availability – whether sites are available now or are likely to become available for development within a reasonable period of time (determined on the merits of a particular case).
- Suitability – with due regard to the requirement to demonstrate flexibility, whether sites are suitable to accommodate the proposal.
- Viability – whether there is a reasonable prospect that development will occur on the site at a particular point in time. Again, the importance of demonstrating the viability of alternatives depends in part on the need that is to be addressed.

4.7. Whilst 'viability' is not expressly referenced by the NPPF or (PPG) in relation to the consideration of planning applications, it is cited as a relevant consideration in the allocation of sites. It is our view that viability remains relevant to the consideration of whether sites are 'suitable' (for completeness, we have, therefore, included viability within our consideration of sequentially preferable sites).

4.8. Paragraph 013 (Reference ID: 2b-013-20190722) of the Planning Practice Guidance acknowledges that providing *"new development in town centre locations can be more expensive and complicated than building elsewhere".* As a result, Local Planning Authorities are required to be both realistic and flexible in terms of their expectations.

4.9. The above parameters provide a robust and policy-compliant basis for the assessment.

4.10. In considering the sites, we have had regard to case law that has influenced the interpretation of the NPPF (and PPG). This case law has included the principles established by the Supreme Court in their judgment regarding a challenge by Tesco Stores Limited in Dundee, which was further clarified by the Secretary of State decision at Rushden Lakes.

4.11. In the Dundee Supreme Court decision, it is confirmed that when applying 'flexibility' to the consideration of alternative sites:

> *"it is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre"* (Paragraph 37).

4.12. And that when applying the sequential test, it should be directed:

> *"to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is something less than that sought by the developer"* (Paragraph 38).

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4.13. The decision confirms that application proposals are generated by *"a developer's assessment of the market and that the criteria of flexibility and realism are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest in doing so."* Applicants should, however, demonstrate flexibility in terms of the scale of development and the amount of car parking required.

4.14. More recent guidance has been provided about the application of the sequential test through a High Court judgment relating to an out of centre food retail proposal in Mansfield (Aldergate Properties Limited and Mansfield District Council and Regal Sherwood Oaks Limited; CO/6256/2015; 8 July 2016). This judgment builds on a Secretary of State decision relating to a mixed-use retail proposal in Exeter (Land North of Honiton Road and West of Fitzroy Road; APP/Y1110/W/15/3005333) dated 30 June 2016.

4.15. Both decisions re-emphasise the 'town centres first' principle. They provide further clarity with regard to the assessment of potential sequentially preferable sites in terms of their 'suitability', 'availability', and the need for the applicant to demonstrate flexibility. In particular, the Mansfield decision confirms that when reviewing potential alternative sites:

- The terms 'suitable' and 'available' mean suitable and available for the *"broad type of development which is proposed in the application by approximate size, type and range of goods."* (Paragraph 35).
- This is to include the requirement for flexibility and "excludes, generally, the identity and personal or corporate attitudes of an individual retailer" (Paragraph 35).
- In terms of a site's 'availability', this relates to a site's availability for the type of retail use for which permission is sought and not to its availability to a particular retailer (Paragraph 42).

4.16. The Mansfield decision therefore confirms that the sites covered by the sequential test search should not vary from applicant to applicant depending on the identity or specific retail model proposed. It is clear, for example, that the requirements of an individual operator, their commercial attitudes, site preferences and competitive preferences should not dictate those sites that are 'suitable' or 'available' (Paragraph 38).

4.17. In the Exeter case, the Inspector concluded (and the Secretary of State agreed) that 'availability' did not require a site to be on the open market to any developer (IR 11.39) and that the requirement to develop other parts of the site did not mean the area identified for retail was not 'available' (IR 11.40).

4.18. In summary, alternative sites have to be suitable for the type of development proposed, but this is subject to a requirement for flexibility from the developer. The extent of flexibility is not a matter of interpretation for the courts, but is a planning judgement which rests, in the first instance, with Local Planning Authority.

4.19. Furthermore, the requirements of individual operators are not generally relevant to the implementation of the test and sites should be assessed for their suitability for the broad type of development proposed. The period in which sites should be available is also a matter of planning judgement, which will vary from case to case, and should be considered in relation to specific sites.

4.20. The sequential assessment set out below has been undertaken in the context set by both relevant planning policy and the clarification provided through the decisions referred to above.

Methodology and Flexibility

4.21. A sequential assessment has been undertaken for the retail element of the development proposals. As outlined above, the site is located outside a designated centre boundary, to the south of Trowbridge town centre. The NPPF instructs that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and Local Planning Authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

4.22. An appropriate catchment area for this sequential assessment focusses mainly on Trowbridge. This forms the key designated centre and the principle centre in the local area. In accordance with the NPPF and local planning policy, we have considered sites that are located within the centre, and in edge of centre and other out of centre locations that are well connected to the centres.

4.23. With regards to search criteria, when considering potential sequential sites for assessment, they should be of a similar scale to the application site to accommodate the broad type of development proposed, and to ensure the site is capable of meeting the commercial requirements of the proposal.

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4.24. The retail element of the development proposal comprises a Class E convenience store with a gross external floorspace of 349 sq. m and 12 dedicated surface level car parking spaces.

4.25. In considering potential alternative sites, however, we have also applied what we consider to be a reasonable level of flexibility with regard to the broad type of development proposed by reference to its approximate site, proposed use, and level of access. The availability of appropriate nearby surface level customer car parking is also a crucial part of the convenience store, and it is key to its commercial success.

4.26. For the purposes of flexibility, we have adopted lower and upper thresholds of 314 sq. m (GEA) and 11 dedicated and nearby car parking spaces, and 384 sq. m (GEA) and 13 dedicated and nearby car parking spaces that potential sites must be capable of accommodating.

4.27. This represents a circa 10% reduction and 10% increase in terms of floorspace and a circa 10% reduction and 10% increase in car parking provision proposed in the application. Any site below or above these thresholds would not, in our opinion, be suitable for the broad type of development proposed and should, therefore, be discounted.

4.28. Convenience store requirements also include:

- A site that can facilitate a store of unrestricted retail floorspace on a single storey, in order to enable efficient and safe circulation around the store.
- A site that can accommodate surface level car parking to allow for safe and convenient customer access to the store.
- A site that allows sufficient space for the safe manoeuvring of customer and delivery vehicles.
- A site in a visible location to attract trade and that is accessible by means other than a car i.e. pedestrians, cyclists, and a choice of public transport;
- A site that provides a dedicated service area to allow access from the road network through the carpark by delivery vehicles.

4.29. The above points are a number of specific criteria that convenience store operators consider when pursuing a site and while a degree of flexibility is often necessary, sites that do not meet the above requirements will simply not be pursued.

4.30. When undertaking our sequential assessment, our review of potential sites is based on the Council's adopted Development Plan documents to help identify development allocations and other potential development opportunities. Planning Potential has also obtained the Goad Portal Plan and Category report of Trowbridge town centre.

4.31. A site visit was undertaken on the 6th June 2023 to the Trowbridge area to review the sites and units identified, and to note any changes to the GOAD Plan. Other potential sequentially preferable sites were also visited and reviewed.

4.32. Our approach has been undertaken in accordance with best practice as set out in the PPG (Paragraph: 011 Reference ID: 2b-011-20190722) and as such, represents a robust position.

Relevant Sequential Sites

4.33. A survey of vacant retail units within Trowbridge town centre was carried out by Planning Potential in June 2023. There are numerous vacant units that are far too small or far too large for the broad type of development proposed, and these are not considered worthy of any further analysis.

4.34. Following the implementation of the above methodology, including the floorspace and car parking thresholds, a number of specific sites have been identified and reviewed as part of the sequential assessment, which are outlined below:

- Site 1 – 1B Wicker Hill, Trowbridge
- Site 2 - Former Argos Extra, Unit E, The Shires Gateway, Bythesea Road, Trowbridge
- Site 3 - Former New Look, 4 The Shires Gateway, Bythesea Road Site 1, Trowbridge
- Site 4 - Former Town Bridge Garage, Wicker Hill, Trowbridge

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- Site 5 - 2 St. Stephens Place Leisure Park, Castle Street, Trowbridge
- Site 6 - 22 - 23 Castle Place Shopping Centre, Trowbridge
- Site 7 - 46 – 47 Church Street, Trowbridge (also known as no. 35)
- Site 8 - 18-19 Castle Place Shopping Centre, Trowbridge
- Site 9 - (Unit 27) 52 The Shires, Trowbridge
- Site 10 - 2 - 3 Silver Street, Trowbridge
- Site 11 - Unit 3 Fore Street, Trowbridge
- Site 12 - Unit at Corner of Castle Street/Red Hat Lane – also known as 26 - 27 Fore Street, Trowbridge
- Site 13 - Unit 4, St Stephens Place Leisure Park, Castle Street, Trowbridge

4.35. Planning Potential has undertaken an extensive review of these sites. Our full assessment and findings on the availability and suitability of these sites are set out in detail in **Appendix 3**. This outlines the specific details of the sites and sets out why they do not represent available or suitable sequential alternatives for the broad type of development proposed.

4.36. It has been demonstrated that all of the analysed sites are not sequentially preferable sites for the following key reasons:

- A number of the sites are too small to accommodate the broad type of development proposed.
- A number of the sites are too large to accommodate the broad type of development proposed.
- Some of the sites are not available or are not expected to become available in a reasonable timeframe.
- There are sites that are not suitable to accommodate the broad type of development proposed due to having no suitable dedicated surface level parking.
- There are sites with constraints relating to ownership, access, and surrounding uses that render the proposal on these sites undeliverable and unacceptable.
- Some of the sites require a comprehensive approach, in order to achieve optimum development of the whole site.
- Many of the sites have layouts and configurations that would make it difficult to accommodate the proposal.
- There are sites not within the appropriate Use Class, and planning applications would be required to change the use.

Sequential Assessment Conclusion

4.37. Our research has identified sites that are worthy of detailed consideration. Planning Potential has undertaken an extensive review of these sites. The above analysis sets out why they do not represent available or suitable sequential alternatives for the proposal.

4.38. For the avoidance of doubt, it is considered unnecessary to analyse any further sites within Trowbridge, as any such sites are no more sequentially preferable than the application site.

4.39. On the basis of the above consideration of alternative sites, we consider that the none represent alternative sites within town or edge of centre locations that should be considered sequentially preferable to the application site. The proposed development site is, therefore, considered to represent the most appropriate site available and suitable for the broad type of development proposed.

4.40. The proposals are compliant with Paragraphs 87 and 88 of the NPPF (2021), and Core Policy 38 (Retail and Leisure) of the Wiltshire Core Strategy (2015). The sequential test is, therefore, passed.

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5. Retail Impact Assessment

5.1. As set out within this report, the application site is situated in an out of centre location. The development proposal includes a convenience store (Use Class E) with a floorspace of 304 sq. m GIA (349 sq. m GEA), of which, 215 sq. m will be devoted to retail sales. This is likely to comprise of 194 sq. m for convenience goods and 21 sq. m for comparison goods.

5.2. National planning policy applying to proposals involving main town centre uses is set out at Paragraphs 87-91 of the National Planning Policy Framework (NPPF). Paragraph 90 of the NPPF confirms that when assessing retail proposals outside town centres, which are not in accordance with an up-to-date plan, Local Planning Authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no threshold, the NPPF confirms that the default threshold is 2,500 sq. m. This should include an assessment of:

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; and

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

5.3. Further clarity regarding the application of the NPPF is provided through the Planning Practice Guidance (PPG) and particularly the advice set out regarding 'Ensuring the Vitality of Town Centres'. This provides guidance on the process to be followed when undertaking impact assessments.

5.4. The Development Plan for Wiltshire currently consists of the Core Strategy adopted in 2015 and the saved policies of the former District Council Local Plans.

5.5. Core Policy 38: Retail and Leisure of the Core Strategy states that *"All proposals for retail or leisure uses on sites not within a town centre in excess of 200 sq. m gross floorspace, including extension of existing units, must be accompanied by an impact assessment, which meets the requirement of national guidance and established best practice, and demonstrates that the proposal will not harm the vitality or viability of any nearby centres."*

5.6. Given the site is situated in an out of centre location and based on the policy position set out above, a retail impact assessment is required in this case.

5.7. Before undertaking the retail impact assessment, it is important to consider Paragraph 017 of the Planning Practice Guidance. This states that *"the impact test will need to be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible."*

5.8. Furthermore, Paragraph 015 of the Planning Practice Guidance also states that *"As a guiding principle, impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town centre stores as they would not normally compete directly)."*

5.9. The above establishes the principle that 'like affects like' – a proposal for predominantly convenience goods is going to have negligible impact upon comparison floorspace – the non-food comparison goods are ancillary to the primary purpose of the proposed store and are considered *de minimis*.

5.10. Furthermore, it is also important to note that the level of 'impact' is assessed on the centre as a whole, rather than on specific retailers or sectors.

Methodology

5.1. Given the scale and nature of the proposed development, particularly with the proposal only marginally above the local threshold for retail impact assessments, we have adopted a simple trade diversion methodology to assess the level of impact. This methodology involves apportioning the turnover of the proposed retail floorspace against existing retail floorspace in the catchment area.

5.2. Drawing on available published data, we have adopted a conventional step-by-step methodology to assess convenience goods retail impact. This is based on an estimate of store turnover and a series of judgements relating to the proportion of turnover estimated to be diverted from existing centres in the 'forecast' year.

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5.3. These judgements are informed by factors such as scale, nature of retail offer, location/distance and extent of 'trading overlap' (or competition) and is considered and underpinned by the principle of 'like competing with like' (as outlined above).

5.4. This methodology is widely applied in retail impact assessment work and reflects that advocated in the Planning Practice Guidance. The approach is considered to be logical, robust, transparent, and proportionate.

5.5. We have assumed that the proposed development will have a relatively local catchment area, principally covering Trowbridge. Accordingly, this is the centre where we estimate the large proportion of trade will be diverted.

Impact Upon Town Centre Vitality and Viability

5.6. To assess the impact upon town centre vitality and viability, a basic trade diversion assessment has been undertaken. Table 1 of **Appendix 4** sets out the estimated turnover of the proposed floorspace. Based on a convenience goods floor area of 194 sq. m and an average sales density of £12,000 per sq. m, the proposal is estimated to have a convenience goods turnover of £2.3m.

5.7. The £12,000 sq. m average sales density is derived from the indicative convenience goods sales density adopted in the Wiltshire Retail and Town Centres Study 2020 Volume 2: Appendices. This is considered to be a realistic and robust estimate for a convenience store of the nature proposed, particularly where the operator is unknown.

5.8. Table 2 then sets out the estimated convenience goods turnovers of Trowbridge. The turnover figures for 2025 (the 'forecast' year) are derived from Table 5b: Convenience Goods Turnover (2025) of the Wiltshire Retail and Town Centres Study 2020 Volume 2: Appendices.

5.9. Should planning permission be forthcoming, this is likely to be received in 2023 and the development constructed shortly thereafter. It is, therefore, considered reasonable to assume that a convenience store of this scale and nature will have reached its optimal trading performance by 2025, and is thus a robust 'forecast' year to adopt.

5.10. Table 3 assesses the level of trade diversion that the centre and retail destinations are likely to experience. The judgements applied in undertaking this exercise reflect those key factors identified above.

5.11. Reflecting relative proximity and 'trading overlap', the proposed convenience store is estimated to derive much of its turnover from the competing out of centre stores to the south of Trowbridge notably the Tesco Extra store at County Way, the Aldi on Bradley Road, the Lidl on Canal Road, and the Tesco Express on Frome Road. In total, 62% of the store's turnover is assumed to be drawn from competing retail facilities to the south of Trowbridge and the wider urban area.

5.12. The remaining turnover is estimated to be drawn from Trowbridge town centre including 14% derived from Asda at The Shires Centre, 6% from Marks and Spencer Foodhall on Cradle Bridge County Way, 10% from Sainsburys at British Row, and 6% from other local shops within the town centre.

5.13. Drawing on this analysis and the earlier tables, we estimate a convenience goods impact of **-1.5%** on Trowbridge town centre in the forecast year (2025) (Table 3). It is considered that the estimated level of impact is very low and will not be significantly adverse, particularly given that the centre is currently trading and performing well, and is resistant to change, as set out in the Health Check Assessment set out in Section 3 above and **Appendix 2**.

Impact upon Existing, Committed and Planned Public and Private Investment

5.14. As set out above, the NPPF requires an assessment of impact upon *"existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal."*

5.15. We are aware of the Opportunity Areas identified in the Wiltshire Core Strategy (2015) for Trowbridge town centre. It is noted, however, that the large majority of these areas relate to public realm improvements or seeking better links between the town centre and the surrounding areas. Where sites are identified for regeneration, these are large sites where comprehensive mixed-use development is envisaged.

5.16. Given the scale and nature of the proposed development, it would not, in our view, adversely affect or deter future investment in Trowbridge.

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Conclusions

5.17. We have assessed the impact of the proposal having regard to the policy considerations set out in Section 3 above. As outlined, the key tests in national and local planning policy are set out in Paragraph 90 of the NPPF and Policy 38 of the Wiltshire Core Strategy. We have considered the implications, in policy terms, of the retail development being proposed, and draw the following key conclusions:

- The Health Check Assessments for the centre of Trowbridge shows that it is a successful and vibrant centre, fulfilling its role within the retail hierarchy well, and are, therefore, robust, and resistant to new proposals, such as the proposed development, opening in out of centre locations.
- On the basis of our analysis, the impacts associated with the proposal in the forecast year are very low and represent no threat to the vitality and viability of the existing centres and the proposals do not result in significant adverse impacts.
- There will not be an adverse impact on existing, committed or planned proposals from the proposed development. It follows that the proposal will not act to deter investment in the centre and there will be no adverse impacts on local investment.

5.18. The impacts identified within the retail impact assessment are not considered to be 'significantly adverse' and, therefore, the proposal complies with all relevant local and national retail planning policies in this regard.

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6. Summary and Conclusions

6.1. This Retail Assessment has been prepared by Planning Potential, on behalf of Coulston Estates Limited, in support of a planning application for the demolition of the existing disused barns, the conversion and extension of the existing farmhouse for office and nursery space at ground floor and retained residential use at first floor. It is also proposed to erect a convenience store and provide the associated access and landscaping works for the site on land off Drynham Road in Trowbridge.

6.2. The retail element of the proposed development comprises the construction of a new single storey 349 sq. m (GEA) convenience store (Use Class E). The floorspace of the retail sales area is proposed to be 243 sq. m (GEA) and the floorspace of the back of house area is proposed to be 106 sq. m (GEA). The convenience store would also have 12 car parking spaces.

6.3. Due to the development proposed being formed by a 'town centre use' and the planning application site being located in an out of centre location, a sequential assessment is required. Furthermore, the retail element of the proposed development is above the local threshold of 200 sq. m (gross), meaning a retail impact assessment is also required to justify the proposal.

6.4. This report, therefore, provides a sequential assessment, and a retail impact assessment associated with the retail floorspace of the proposed scheme.

Sequential Test

6.5. The sequential assessment has undertaken a comprehensive search of potential alternative sites within in centre, edge of centre, and other out of centre locations in Trowbridge. Our assessment demonstrates that there are no other more centrally located sites, which are available, suitable, and viable to accommodate the proposed development. In conclusion, it follows that the application site is the most sequentially preferable, and the sequential test is passed.

6.6. It is, therefore, clear that the planning application meets the sequential test set by Paragraph 87 and 88 of the NPPF, and Core Policy 38 (Retail and Leisure) of the Wiltshire Core Strategy (2015).

Retail Impact Test

6.7. The retail impact assessment has also robustly assessed the potential for the proposal to cause significant adverse impacts upon the overall vitality and viability of relevant nearby centres, in addition to existing, committed, or planned investment within these centres. The retail impact assessment demonstrates the following:

- The Health Check Assessments for the centre of Trowbridge shows that it is a successful and vibrant centre, fulfilling its role within the retail hierarchy well, and are, therefore, robust, and resistant to new proposals, such as the proposed development, opening in out of centre locations.
- On the basis of our analysis, the impacts associated with the proposal in the forecast year are very low and represent no threat to the vitality and viability of the existing centres and the proposals do not result in significant adverse impacts.
- There will not be an adverse impact on existing, committed, or planned proposals from the proposed development. It follows that the proposal will not act to deter investment in the centre and there will be no adverse impacts on local investment.

6.8. Assessed impacts are not 'significantly adverse' and the proposal is accordingly in compliance with retail guidance in the NPPF. On the basis of the foregoing analysis, we conclude that the application proposal complies with the test of 'impact' set by Paragraph 90 of the NPPF and Core Policy 38 (Retail and Leisure) of the Wiltshire Core Strategy (2015).

Overall Conclusions

6.9. On the basis of the consideration of the proposals set out in this Assessment (and other supporting documents), we consider that the application proposals represent appropriate development and comply with relevant retail planning policy at all levels.

6.10. There are no alternative and sequentially preferable sites, and retail impacts are within acceptable thresholds. Furthermore, the beneficial economic development proposed will deliver an improved retail offer for existing and future residents, reduce the need to travel and keep shopping local, and provide local job opportunities, delivering a timely boost to the local economy.

6.11. It has been demonstrated that the proposed development complies with all relevant local and national retail planning policies that relate to the sequential and impact tests, and planning permission should not be withheld in respect of these matters.

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Appendix 1

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Site Location Plan

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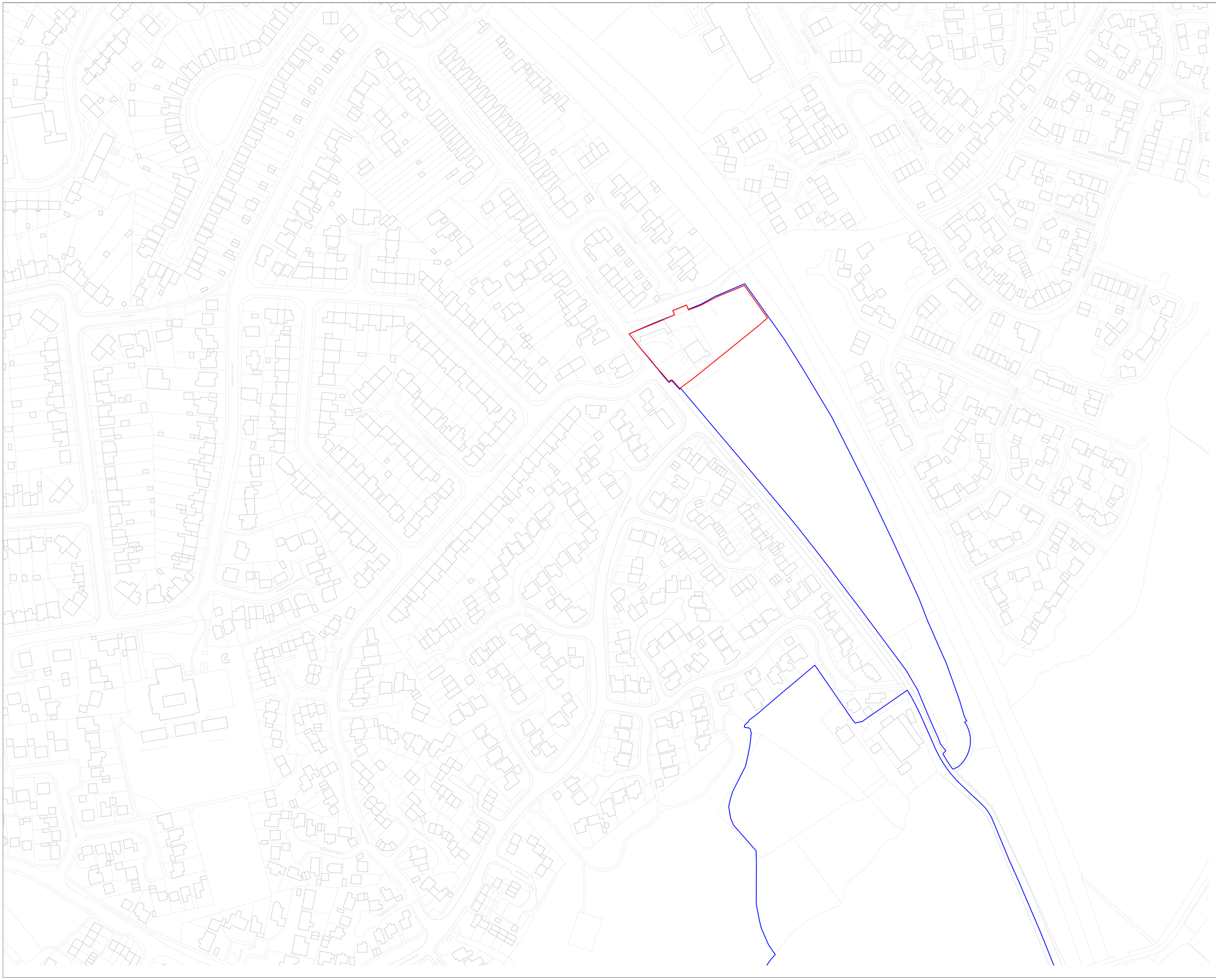

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THE ICE HOUSE G/F NORTH OFFICE 124-126 WALCOT STREET BATH BA15BG

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SCALE BAR 1:1250

REV	DATE	DETAILS
B	20.05.23	Boundary Amendments
A	10.05.23	CLIENT ISSUE + Boundary Amendments

MITCHELL
ELEY
GOULD

STUART JONES
SOUTHVIEW FARM
CONVENIENCE STORE
LOCATION PLAN

PLANNING	NOV 2022	1:1250@A1	RM	NJ
2226	AL(0)01			B

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Appendix 2

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Trowbridge Town Centre Health Check Assessment

Introduction

Trowbridge town centre is a central hub to many western areas of Wiltshire. It has a key role in the retail hierarchy for the area, acting as a 'Principal Settlement' as identified by Wiltshire Council. The town centre is located approximately 870m north of the application site. We set out below an assessment of the current health of Trowbridge town centre to inform the assessment of retail impact, and to assist the Council in their decision making.

Trowbridge is a town of circa 37,169 population (2021 Census). It is the third largest town centre in Wiltshire and is within commuting distance to Bath and Bristol. The town is divided by the river Bliss that runs from east to west through the town. The town centre boundaries extend from County Way in the east to Stallard Road in the west, Bythesea road in the south, and Roundstone Street and Church Street in the north.

The Wiltshire Core Strategy (2015) Policy Map shows that the Primary Shopping Area includes the areas of Market Street and Fore Street, with the inclusion of Castle Place Shopping Centre and The Shires Shopping Centre. The town centre commercial area boundary extends past Sainsburys in the west, to Bythesea Road in the south.

A GOAD Plan and a Goad Category Report for Trowbridge town centre has been obtained from Experian, which were compiled based on a survey on the 4th April 2022. This is the most up to date information from Experian.

A site visit was undertaken by Planning Potential on 6th June 2022 to the Trowbridge area to review the sites and units identified, and to note any changes to the GOAD Plan.

Health Check Assessment

Centre	**Trowbridge Town Centre**
Example Images of the Town Centre	 *Source: Planning Potential (2023)*  *Source: Planning Potential (2023)*
Retailer Representation and Intentions to Change Representation	Trowbridge has a good balance of multiple and independent retailers that provide for the everyday needs of the local population, as well as a diverse offer and distinctiveness for Trowbridge, and the surrounding areas. There was evidence of a healthy turnover and churn of stores recently being occupied or under alteration during Planning Potential's visit to Trowbridge. Of the vacant units in the GOAD plan and report, some have now been occupied and are trading and some are still vacant. For example, there were signs and hoarding on the recently vacated former New Look advising that a Sport Direct was soon opening from that unit.

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Additionally, other units have also changed uses and 8 units have either been made into dwellings or are no longer present i.e three units shown on British Row in the GOAD plan (2022) are now within Sainsburys.

There are numerous changes to the units in the town centre compared to 2022, which shows that retailers are willing to invest into the town, and Trowbridge town centre is an attractive place to operate. This is particularly reassuring given the volatility of the retail market during and after the COVID-19 pandemic, and during the current cost of living crisis.

Diversity of Uses

A summary of the uses located within the centre are set out below, outlining the main sectors identified within the GOAD report. Provision of these sectors within the centre has been updated by Planning Potential in our 6th June 2023 site visit, and, therefore, forms the most up to date position.

Table 1. Diversity of Uses in Trowbridge

Category	GOAD (04/04/2022)		Planning Potential (06/06/2023)		GOAD UK Average
	No. of Units	%	No. of Units	%	(%)
Comparison	84	26.25	79	25.32	26.83
Convenience	20	6.25	23	7.37	9.28
Retail Service	59	18.44	57	18.27	15.75
Leisure Service	65	20.31	60	19.23	25.46
Financial & Business Service	39	12.19	32	10.26	8.65
Vacant	53	16.56	61	19.55	13.83
Other retail	0	0	0	0	0.06
Total	320		312		

Based on the diversity of uses set out above, the convenience goods offer in Trowbridge town centre is limited. The large convenience stores in the town centre consist of Asda, Sainsburys, and Iceland. There are other small local convenience units within the town centre, as well as independent traders. The convenience offer accounts for 7.37% of all units within the town centre.

In contrast, there is a significantly higher proportion of units in the comparison goods sector. It is clear that comparison goods retailing forms the largest proportion of the units within the town centre, consisting of 25.32% of the total number units.

Leisure Services also form a large proportion of the units within the town centre, consisting of 19.23% of the total number units, and retail services form 18.27% of the total share of units. The financial and business service units take up 10.26% of the units.

In conclusion, we consider that Trowbridge town centre consists of a good mix of uses, which are diverse in nature, and reflective of a town centre serving the local population and wider catchment well.

Balance between Independent and Multiple Stores

As outlined above, the comparison and convenience goods sectors within Trowbridge town centre are formed by both national multiple and independent retailers. This is also the case for the leisure service sector and financial services sector.

The national multiple retailers within the centre include Asda, Sainsburys, Iceland, Poundland, Clarks, WH Smith, Boots, Superdrug, EE, The Works, Thorntons, H Samuel, and Savers Health and Beauty. Takeaways and coffee

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	shops include Coffee #1, Subway and Boswells. Charity shops include British Heart Foundation, Julian House, and Children's Hospice southwest. Multiple betting shops include Coral, Paddy Power and Merkur slots. National banks include Lloyds, NatWest and HSBC, and building societies such as Halifax, Nationwide and the Coventry building society. It can, therefore, be seen here multiple stores account for a reasonable amount of the units found in Trowbridge. Trowbridge has a large availability of independent stores, which include Master shoe, H.B. Pitt Garden shop, The Codfather Fish and Chips, Anatolia café, Dream Rassay Indian Restaurant, Mega Pizza, Zinc Nightclub, The Kings Arms, Simpsons Jeweller, Leybers coffee shop, Zaza hair, and many other independent stores found across the town centre. It can be said that Trowbridge has a well-balanced mix between multiple and independent stores, with the number of independent stores exceeding that of the multiple stores.
Proportion of Vacant Street Level Property	It can be seen in Table 1 above that there is an above average amount of vacant premises within the town centre at 19.55% of units. The vacant units are, however evenly spread across the town centre, with no particular areas of high vacancies or clusters of vacant units. Vacancies can appear in even the healthiest of centres, and it is clear that Trowbridge town centre is performing well and an attractive place to operate despite the vacant units. Planning Potential also note that although there are vacant units in the centre, a large number of these are under alteration and have opening dates for new occupiers advertised on hoardings on the units and around the centre. This is particularly reassuring given the volatility of the retail market during and since the COVID-19 pandemic and recent cost of living crisis.
Extent to which there is Evidence of Barriers to New Businesses Opening and Existing Businesses Expanding	There do not appear to be any significant barriers to new businesses opening or existing businesses expanding, other than the scale of the units available remain limited. It is noted that the number of vacant units within the town centre has increased by 8 units, (12 have been newly occupied and 21 have become vacant) between the Goad Survey being undertaken in April 2022 and our visit in June 2023. In addition, eight units have either been converted to dwellings or have been demolished or incorporated in to Sainsburys. The increase in units is balanced by the constant turnover of units in the town centre, and as mentioned above, we note that although there were vacant units in the centre, a large number of these are under alteration and have opening dates for new occupiers advertised on hoardings on the units and around the centre. It is also noted that new retail units are proposed at the Former Town Bridge Garage, Wicker Hill via planning application (ref. PL/2023/02463), and 26-27 Fore Street via planning permission (ref. 21/01148/FUL). Additionally, the Castle Place Shopping Centre has recently been purchased, which shows that there is continued investment in the town centre. In conclusion, we consider that there is limited evidence of barriers to new businesses opening and existing businesses expanding within Trowbridge town centre. Moreover, it is clear that businesses are continuing to invest and occupy vacant units. There are numerous changes to the units in the town centre compared to 2022, which shows that retailers are willing to invest into the town and Trowbridge town centre is an attractive place to operate.
Opening Hours / Availability / Extent to Which There is an Evening and Night-time Economy Offer	From our review of Trowbridge town centre there appears to be a reasonable evening and night-time economy offer, with several public houses, a nightclub, bars, and restaurants staying open late into the evening. Furthermore, as outlined above, the leisure services account for 19.23% of the total number of units within the town centre. While it is acknowledged that not all of the service operators will open late into the evening, it is understood that a good number do, which demonstrates the strength of the leisure sector, and the availability and offer within the evening economy.

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	It is considered that the opening hours, availability, and extent to which there is an evening and night-time economy offer provides a positive impact on the overall vitality and viability of Trowbridge town centre.
Pedestrian Flows	When Planning Potential undertook their site visit, the footfall within the area was relatively bustling. The locations where there were higher footfalls occurred mainly on Fore Street, this is primarily helped by the concentration of leisure services units. The other areas that had a good level of footfall were Asda and the Shires shopping centre. It was observed that much of the Shires car park was full, with high levels of pedestrian flows in and out of the above-named locations. This suggests that these areas are main focal points of the potential customer base. The footfall found on Fore Street and the Shires have been helped by the semi-pedestrianised and fully pedestrianised nature of the above-named areas. This has allowed for the expansion of multiple and independent stores to extend parts of their operations into the street scape, in particular leisure services such as Lyber's coffee shop and Costa coffee. It is considered that there are good pedestrian flows throughout the town centre, which is indicative of the centre as a whole being vibrant and performing well.
Accessibility	The town centre is accessible through various means of transport, which includes walking, cycling, train, bus, and car. The pedestrian flows throughout the town centre have already been discussed above, with the town centre being well connected via various walking routes. During Planning Potential's site visit there was evidence of cycling, with a cycle parking area being available in the town centre, near The Shires, as well as the train station. The train station is only a 10-minute walk outside of the town centre with regular trains every 10-15 minutes. This encourages a wider reach of transport options for people to travel into Trowbridge. These connections include areas such as Bristol, Bath, Portsmouth, Weymouth, Westbury, Gloucester, Cardiff, Swindon, Warminster, and Salisbury to name a few. This helps to connect Trowbridge to many of the surrounding areas, increasing connectivity to the town centre. For mobility-impaired users, the central area is facilitated with lift and ramp access to the shopping mall and designated disabled car parking. During Planning Potential's visit, it was clear that car is the preferred method of travel to the town centre. This was further supported by the presence of car parks within walking distance of the town centre. During the visit it was found that many car parks were reaching maximum capacity, although it is considered that there was still sufficient spaces available throughout the centre as a whole. There are 14 car parks in the town centre offering a total of 3,161 car parking spaces. Most of the car parks are pay and display and are open 24 hours. There are also some car parks offering a limited amount of time for free parking. It is considered that Trowbridge adequately meets its needs for parking provision around the town centre. Trowbridge has frequent bus services throughout the town centre, servicing many of the dependent communities that surround the Principal Settlement location. There are multiple bus stops within the town centre boundary, which include stops on Castle Street, Market Street, Fore Street, Manvers Street and Stallard Street. It is considered that Trowbridge is a well-connected community within Wiltshire, with multiple bus links to and from the town centre. In conclusion, Trowbridge is a highly accessible town, with multiple modes of transport, both public and private. This ensures that Trowbridge town centre is an attractive, well-connected centre for both local residents and visitors alike. This helps to contribute to the town centre's vitality and viability.
Perception of Safety and Occurrence of Crime	We consider there is a good perception of safety due to the natural surveillance and attractive environment. There were security guards, CCTV cameras, and the area overall appeared to be safe. We do not consider there to be a high perception of crime or risk to visitor safety.
State of Town Centre Environmental Quality	The overall state of the town centre environment quality is high, with many historical buildings within the town centre. With this in mind, much of the architecture has been focused on the architectural styles, originally found in the 18th century, with local sandstone taken into the design of many of the buildings. There are little to no signs of vandalism

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	and graffiti present on the buildings of the town centre, and multiple operators were found to be providing external seating areas, which help to make an attractive streetscape. Green space is primarily limited to the areas of St James Church and Trowbridge Town Park, which also provide an historic element to the environmental quality of the town centre. It is considered that the Trowbridge town centre's environmental quality is of a good standard.
Conclusion	We consider that Trowbridge town centre is performing well and fulfils its role as a Principle Settlement. Indicators confirm that the centre is viable and resistant to change through a diverse mix of uses (including a good mix of multiple and independent businesses), and the centre is accessible by various modes of transport. The town centre is environmentally attractive, with a low perception of crime, and the centre provides an offer both day and night for the local population. These attributes continue to attract local residents and visitors, and demonstrate that the centre is a vital and vibrant location that is not vulnerable to retail impact.

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Appendix 3

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Sequential Assessment

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Sequential Assessment

Site 1				
Address	**Floorspace (Sq. m)**	**Use Class**	**Assessment**	
1B WICKER HILL	**220**	**E**	**Context**	The previously vacant unit is now currently in Class E Use as a foodstore/supermarket. The site is not within the Primary Shopping Frontage, but is located within the town centre commercial area boundary (In Centre). The site is also located within the Conservation Area. There is no recent relevant planning history for the unit.
			**Suitability**	The unit at 220 sq. m in size is too small for the proposed development even with flexibility applied. The unit is, therefore, not suitable.
			Availability	The unit is now occupied by Wicker Hill food stores and is not available or likely to be available in a reasonable timeframe.
			Conclusion	We conclude that the site is not available or suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

Site 2				
Address	**Floorspace (Sq. m)**	**Use Class**	**Assessment**	
Former Argos Extra, The Shires Gateway, Bythesea Road	**1,300**	**E**	**Context**	The former Argos Extra (Class E) unit is currently vacant. The site is not within the Primary Shopping Frontage but is located within the town centre commercial area boundary (In Centre) according to Inset Map 9: Trowbridge and is edge of centre according to the Interactive Policy Map. The site is not located within the Conservation Area. There is no recent relevant planning history for the unit.
			**Suitability**	At 1,300 sq. m the unit is far too large for the proposed development even with flexibility applied. The unit is almost four times the size of the proposed convenience store, and taking on such a large unit would render the scheme unviable. Furthermore, there is no dedicated surface level and nearby parking. It is, therefore, considered not suitable.
			Availability	The unit is not being actively marketed, but for the purposes of this assessment we have concluded that it is available.

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	Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

Site 3				
Address	**Floorspace (Sq. m)**	**Use Class**	**Assessment**	
Former New Look, 4 The Shires Gateway, Bythesea Road	**880**	**E**	**Context**	The Class E unit is currently vacant following the closure of New Look on the 23rd January 2023. The site is not within the Primary Shopping Frontage, but is located within the town centre commercial area boundary (In Centre) according to Inset Map 9: Trowbridge and is edge of centre according to the Interactive Policy Map. The site is not located within the Conservation Area. There is no recent relevant planning history for the unit.
			**Suitability**	At 800 sq. m the unit is far too large for the proposed development even with even with flexibility applied. The unit is over double the size of the proposed convenience store and taking on such a large unit would render the scheme unviable. Furthermore, there is no dedicated surface level and nearby parking. It is, therefore, considered not suitable.
			Availability	The unit has hoarding and signage advising that a new Sports Direct store will open soon from the unit. For the purpose of this assessment we have, therefore, concluded that it is not available or likely to be available in a reasonable timeframe.
			Conclusion	We conclude that the site is neither available nor suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 4				
Address	**Floorspace (Sq. m)**	**Use Class**	**Assessment**	
Former Town Bridge Garage, Wicker Hill	**1,420**	**E and Sui Generis**	**Context**	The site comprises a large derelict and vacant car dealership that ceased trading in 2007, as well as workshop buildings. The site has since been partially used for retail and storage purposes on an intermittent basis along with various periods of vacancy. The property is currently classified as a vehicle/car garage, but has historically been used for a mix of commercial and retail as well. This includes it being leased as a bathroom showroom prior to the recent period of vacancy. In 2014, planning permission was granted for a change of use of the buildings from a former car showroom/garage (Sui Generis Use) to a depot for storage/sales/MOT centre and flexible (former) A1-A5 use to ground floor and flexible (former) A2/B1(a) use to first floor. It appears that this application was not implemented and has now lapsed. A planning application (ref. PL/2023/02463) has been submitted for a change of use from retail (Class E) and garage (sui generis) to a mixed use comprising of ground floor retail and ancillary storage (Class E) with drinking establishment (sui generis) at first floor. This application has not yet been determined, but seeks to gain permission for the property to have a mix of small-medium sized units. The total floorspace proposed in the application is 1,450 sq. m.
			**Suitability**	The site would need to be totally redeveloped alongside the surrounding land and buildings as part of a comprehensive scheme for it to be deliverable and viable. Furthermore, at 1,420 the building is far too large for the proposed retail element of the development even with flexibility applied. The unit is over four times the size of the retail element of proposed development and taking on such a large building would render the scheme unviable. Planning application (ref. PL/2023/02463) seeks to gain permission for the property to have a mix of small-medium sized units. The total floorspace shown in the application is 1,450 sq. m split into numerous small units, all of which are too small for the proposed development even with flexibility applied. Furthermore, there is no dedicated surface level and nearby parking. It is, therefore, considered that the site is not suitable.
			Availability	The unit is not being actively marketed, and the freehold owners are HG Venture Ltd who have submitted the planning application (ref. PL/2023/02463). However, for the purpose of this assessment we have concluded that

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		the site is available.
	Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

Site 5				
Address	**Floorspace (Sq. m)**	**Use Class**	**Assessment**	
2 St. Stephens Place Leisure Park, Castle Street	**280**	**E**	**Context**	The vacant unit was previously occupied by DOUGH&co Woodfired Pizza, which has opened and closed since the GOAD report in 2022. The unit was previously occupied by El Guaca Dean's Diner. The site is not within the Primary Shopping Frontage, but is located within the town centre commercial area boundary (In Centre). The property is not Listed, but is situated within the Trowbridge Conservation Area. There is no recent relevant planning history for the unit.
			**Suitability**	The unit at 280 sq. m in size and is too small for the proposed development even with flexibility applied. The unit is, therefore, not suitable.
			Availability	The unit is being actively marketed, and for the purposes of this assessment, we have concluded that it is available.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 6				
Address	**Floorspace (Sqm)**	**Use Class**	**Assessment**	
22 - 23 Castle Place Shopping Centre	**400**	**E**	**Context**	The site is vacant and was previously occupied by Shaws the Drapers until late 2022 / early 2023. The site is located within the Primary Shopping Frontage and the town centre commercial area boundary (In Centre). The site is also located within the Conservation Area. There is no recent relevant planning history for the unit. The Castle Place shopping centre was due to be sold in an online auction on Thursday (May 18 2023), but auctioneers Acuitus listed the 1970s centre in Market Street as "sold prior to auction" on its website for the sale. The property was owned by Nexus Properties Ltd and managed by APAM, a retail investment property company. It is unclear who now owns the centre.
 Source: Wiltshire Times			**Suitability**	At 400 sq. m the unit is too large for the proposed development even with even with flexibility applied, and taking on such a large unit would render the scheme unviable. Furthermore, there is no dedicated surface level and nearby parking. The unit is, therefore, not suitable.
			Availability	The unit is being actively marketed, and for the purposes of this assessment, we have concluded that it is available.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 7				
Address	**Floorspace (Sqm)**	**Use Class**	**Assessment**	
46 – 47 Church Street. Also known as no. 35.	**270**	**E**	**Context**	The vacant unit was previously occupied by Food Plus (Polish convenience store). The site is not within the Primary Shopping Frontage, but is located within the town centre commercial area boundary (In Centre). The site is also located within the Conservation Area. There is no recent relevant planning history for the unit.
			**Suitability**	Planning applications relevant to the unit show the total area available for a retail store to be 270 sq. m, which is too small for the proposed development even with flexibility applied. Furthermore, there is no dedicated surface level and nearby parking. The unit is, therefore, not suitable.
			Availability	The unit is not being actively marketed, but for the purposes of this assessment, we have concluded that it is available.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 8				
Address	**Floorspace (Sq. m)**	**Use Class**	**Assessment**	
18-19 Castle Place Shopping Centre	**390**	**Sui Generis**	Context	The site is a vacant Public House (J.D. Wetherspoon) formerly known as Sir Isaac Newton. The site is not within the Primary Shopping Frontage, but is located within the town centre commercial area boundary (In Centre). The site is also located within the Conservation Area. There is no recent relevant planning history for the unit.
			**Suitability**	At 390 sq. m the unit is too large for the proposed development even with even with flexibility applied, and taking on such a large unit would render the scheme unviable. The site is also in Sui Generis use with a layout of a public house that would not be suitable for a small convenience store. Furthermore, there is no dedicated surface level and nearby parking. The unit is, therefore, not suitable.
			Availability	The unit is not being actively marketed, but for the purposes of this assessment, we have concluded that it is available.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 9				
Address	**Floorspace (Sq. m)**	**Use Class**	**Assessment**	
(Unit 27) 52 The Shires	**390**	**E**	**Context**	The site is a vacant retail unit in Class E Use. It was previously a "Get It Cleared Showroom" (Second hand goods store). The site is located within The Shires shopping centre. The site lies within the Primary Shopping Centre and the town centre commercial area boundary (In Centre).
			**Suitability**	Although the marketing particulars state that the unit is 361 sq. m, GOAD identifies the unit as 390 sq. m in total. The unit is, therefore, likely to be too large for the proposed retail element of the development even with even with flexibility applied. Taking on such a large unit would render the scheme unviable. Furthermore, the unit is at first floor level within a shopping centre and, therefore, is a different format to what is proposed through the application. There is also no dedicated surface level and nearby parking. The unit is, therefore, not suitable.
			Availability	The unit is being actively marketed and is considered available for the purpose of this assessment.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 10				
Address	**Floorspace (Sq. m)**	**Use Class**	**Assessment**	
2 - 3 Silver Street	**400**	**E**	**Context**	The site is vacant and was previously occupied by M&Co. The site is located within the Primary Shopping Frontage and the town centre commercial area boundary (In Centre). The site is also located within the Conservation Area. There is no recent relevant planning history for the unit.
			**Suitability**	At 400 sq. m the unit is too large for the proposed development even with even with flexibility applied, and taking on such a large unit would render the scheme unviable. Furthermore, there is no dedicated surface level and nearby parking. The unit is, therefore, not suitable.
			Availability	The unit is being actively marketed, and for the purposes of this assessment, we have concluded that it is available.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 11				
Address	**Floorspace (Sqm)**	**Use Class**	**Assessment**	
Unit 3 Fore Street	**280**	**E**	**Context**	The site is vacant and was previously occupied by Barclays Bank. The site is located within the Primary Shopping Frontage and the town centre commercial area boundary (In Centre). The building is Grade II* Listed and is also located within the Conservation Area. In 2022, planning permission (ref. PL/2022/06460) and Listed Building consent (ref. PL/2022/06460) was granted for external alterations, including the removal of the existing ATM and to reinstate the existing window, and remove the branch nameplate and signage. Internal alterations including the removal of the dividing wall, doors, counters, fixtures, fittings, and ATMs were also approved.
			**Suitability**	The unit at 280 sq. m in size and is too small for the proposed development even with flexibility applied. Furthermore, there is no dedicated surface level and nearby parking. The unit is also Listed meaning that the already restricted internal layout would be very difficult to amend to suit a convenience store. The unit is, therefore, not suitable.
			Availability	The unit is being actively marketed, and for the purposes of this assessment, we have concluded that it is available.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 12				
Address	**Floorspace (Sqm)**	**Use Class**	**Assessment**	
Unit at Corner of Castle Street/Red Hat Lane – also known as 26-27 Fore Street	**530**	**E**	**Context**	The 5-storey vacant building was previously used as a department store with ancillary offices and storage. The site is located within the Primary Shopping Frontage and the town centre commercial area boundary (In Centre). The site is also located within the Conservation Area. In February 2022, planning permission (ref. 21/01148/FUL) was granted a change of use from retail (Class E) to 24 residential flats on all 5 floors comprising of 9 x 1 beds and 15 x 2 beds (Class C3) and part retention on the ground floor as Commercial (Class E), along with extensions and external alterations. It is unclear if this permission has been implemented, but he retail element is only 69 sq. m in size.
			**Suitability**	At present the existing unit is 530 sq. m (ground floor) and is too large for the proposed development even with flexibility applied, and taking on such a large unit would render the scheme unviable. Furthermore, there is no dedicated nearby street level parking. It is unclear if the permission (ref. 21/01148/FUL) has been implemented, but the approved retail element is only 69 sq. m in size, which is far too small for the proposed development even with flexibility applied. The unit is, therefore, not suitable.
			Availability	The site has extant planning permission for residential and retail uses. The site is owned by Stonegate Homes (Trowbridge) Ltd and is not being actively marketed, but for the purposes of this assessment, we have concluded the site is available.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Site 13				
Address	**Floorspace (Sqm)**	**Use Class**	**Assessment**	
Unit 4, St Stephens Place Leisure Park, Castle Street	**450**	**E**	**Context**	The vacant unit was previously occupied by Chiquito Restaurant which closed in 2020, as far as we are aware. The site is not within the Primary Shopping Frontage, but is located within the town centre commercial area boundary (In Centre). The property is not Listed, but is situated in Trowbridge Conservation Area. There is no recent relevant planning history for the unit.
			**Suitability**	At 450 sq. m the unit is far too large for the proposed development even with even with flexibility applied, and taking on such a large unit would render the scheme unviable. The unit is, therefore, not suitable.
			Availability	The unit is being actively marketed, and for the purposes of this assessment, we have concluded that it is available.
			Conclusion	We conclude that although the site is available, it is not suitable to accommodate the broad type of development proposed. It is, therefore, not considered sequentially preferable.

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Appendix 4

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Retail Impact Tables

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Retail Impact Assessment

Table 1 - Proposed Development

	Gross Internal Area (sq m)	Net Retail Sales Area (sq m)	Convenience Goods Floorspace (sq m)	Average Sales Density (£/sq m)	Total Turnover (£m)
Convenience Store	304	215	194	£12,000	£2.3

1. Floorspace figures derived from plans and other application documentation

2. Sales density derived from indicative convenience goods sales density from Wiltshire Retail and Town Centres Study 2020 Volume 2: Appendices

Coulston Estates Ltd
Drynham Road, Trowbridge
Retail Impact Assessment

Table 2 - Convenience Goods Turnover (2025)

Centre	Turnover (£m)
Trowbridge - Town Centre	
Asda, The Shires Centre, Trowbridge	£21.0
Iceland, The Shires, Trowbridge	£1.1
Marks & Spencer (Foodhall), Cradle Bridge County Way, Trowbridge	£2.1
Sainsburys, British Row, Trowbridge	£31.2
Local Shops, Trowbridge Town Centre	£5.1
Sub-Total	*£60.5*
Trowbridge - Out of Centre	
Aldi, Bradley Road, Trowbridge	£19.1
Lidl, Canal Road, Trowbridge	£11.0
Tesco Express, Brook Road, Trowbridge	£6.6
Tesco Express, Eastbourne Road, Trowbridge	£1.1
Tesco Express, Frome Road, Trowbridge	£4.9
Tesco Extra, County Way, Trowbridge	£51.8
Other	£1.1
Total - Trowbridge	**£156.1**

1. 2025 turnover figures derived from Table 5b: Convenience Goods Turnover, 2025 of Wiltshire Retail and Town Centres Study 2020 Volume 2: Appendices

Coulston Estates Ltd
Drynham Road, Trowbridge
Retail Impact Assessment

Table 3 - Retail Impact (2025)

Centre	Turnover (£m)	Trade Diversion (%)	Trade Diversion (£m)	Resultant Turnover (£m)	Impact (%)
Trowbridge - Town Centre					
Asda, The Shires Centre, Trowbridge	£21.0	14.0%	£0.3	£20.7	-1.5%
Iceland, The Shires, Trowbridge	£1.1	2.0%	£0.0	£1.1	-4.2%
Marks & Spencer (Foodhall), Cradle Bridge County Way, Trowbridge	£2.1	6.0%	£0.1	£2.0	-6.6%
Sainsburys, British Row, Trowbridge	£31.2	10.0%	£0.2	£31.0	-0.7%
Local Shops, Trowbridge Town Centre	£5.1	6.0%	£0.1	£5.0	-2.7%
Sub-Total	***£60.5***		***£0.9***	***£59.6***	***-1.5%***
Trowbridge - Out of Centre					
Aldi, Bradley Road, Trowbridge	£19.1	12.0%	£0.3	£18.8	-1.5%
Lidl, Canal Road, Trowbridge	£11.0	5.0%	£0.1	£10.9	-1.1%
Tesco Express, Brook Road, Trowbridge	£6.6	1.0%	£0.0	£6.6	-0.4%
Tesco Express, Eastbourne Road, Trowbridge	£1.1	2.0%	£0.0	£1.1	-4.2%
Tesco Express, Frome Road, Trowbridge	£4.9	5.0%	£0.1	£4.8	-2.4%
Tesco Extra, County Way, Trowbridge	£51.8	35.0%	£0.8	£51.0	-1.6%
Other	£1.1	2.0%	£0.0	£1.1	-4.2%
Total - Trowbridge	**£156.1**	**100.0%**	**£2.3**		