



SEQUENTIAL TEST & RETAIL IMPACT ASSESSMENT

LAND NEAR CALNE, WILTSHIRE



The background of the entire page is a detailed, isometric line drawing of a cityscape. It features various buildings of different heights and styles, streets with cars, and green spaces. The drawing is in a light teal color, matching the overall theme of the document.

SEQUENTIAL TEST & RETAIL IMPACT ASSESSMENT

On behalf of: G & SM Wilkins & Son

In respect of: Land near Calne, Wiltshire SN11 8QJ

Date: May 2026

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1.0 Introduction

- 1.1 This sequential and retail impact assessment statement has been prepared in support of the application for a farm shop and café (Use Class E) with associated parking, as required by Policy 38 of the Wiltshire Core Strategy (2015).
- 1.2 The proposal is intended to be located on land near Calne , Wiltshire SN11 8QJ
- 1.3 The total retail (net) floorspace will be 554 sq.m. broadly consisting of the following:
- A farm shop with a retail area of 283 sq.m.net
 - A ground floor café seating area of 105 sq.m.
 - A mezzanine level café seating area of 116 sq.m.
 - A takeaway coffee facility of 50 sq.m.
- 1.4 As set out in the planning application, the proposed building will have an overall gross floorspace of 1081 sq.m, with back of house areas including a butchery, kitchen and prep area, warehouse, staff facilities, insulated silo and a servery.
- 1.5 The proposed farm shop and café will sell a range of products including:
- Meat
 - Cakes
 - Bread
 - Eggs
 - Flour
 - Frozen meals and pies
 - Soup
 - Quiche
 - Deli items (such as scotch eggs, sausage rolls etc)
- 1.6 It is hoped that over time, many of the above products will be grown and produced by the Applicants on their nearby farm. There will also be sales of locally sourced products including milk, honey, fruit and veg, as well as other bought in products including drinks, beers wines and spirits.

Policy Context

National Planning Policy Framework

- 1.7 Chapter 7 of the National Planning Framework outlines policies that ensure the vitality of the town centre. Paragraph 91 outlines that local authorities should require a sequential test when assessing applications for retail development outside of town centres or where not in accordance with an up-to-date plan. Paragraph 94 goes on to say that an impact assessment should be carried out for these proposals where the development exceeds a locally set floorspace threshold.

Local Development Plan

- 1.8 The development plan for Wiltshire comprises several documents including the Wiltshire Core Strategy (2015), the Wiltshire Housing Site Allocations Plan, the Chippenham Site Allocations Plan, a suite of Minerals and Waste Plans and a number of Neighbourhood Plans.

- 1.9 Core Policy 38 of the Core Strategy outlines the Council's approach to the assessment of retail and leisure proposals. It states:

"All proposals for retail or leisure uses on sites not within a town centre in excess of 200 sqm 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. All such proposals must also comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available".

- 1.10 Within the 2nd Calne Neighbourhood Plan (Made March 2025) there are two policies relating to the town centre:

Policy WS2.1 states that *"Development proposals within Calne Town Centre must consider, assess and address their impact on the streets, pavements, parking areas and other public spaces and the opportunities provided to improve the quality, accessibility and safety of the public realm and benefit businesses and customers alike".*

Policy WS2.2 states that *"Development proposals within or immediately adjacent to the defined Calne Town Centre must consider and address their relationship to the vision set out in the Calne Town Centre Masterplan (April 2014) and the evolving plans deriving from that. Proposals should demonstrate how they contribute to the Masterplan objectives and dovetail with ambitions for the Town Centre as a whole. In particular, proposals that have the potential to benefit vehicular, pedestrian and cycle movement within the Town Centre, helping to tackle issues identified within the Masterplan, should consider and address opportunities as part of their scheme".*

- 1.11 The Devizes Area Neighbourhood Plan (made 2015) contain no relevant retail policies.

Emerging Local Development Plan

- 1.12 The pre-submission draft Wiltshire Local Plan (2020 – 2038)(Regulation 19) was submitted for examination in November 2024. The Inspectors held a Focussed Hearing Session considering the Duty to Co-operate on June 24th 2025. The Inspectors' Post Hearing Letter was published on the July 4th 2025. On July 30th 2025 the Council updated their Evidence Base Index¹. According to the

¹ [Wiltshire Local Plan Examination](#)

Local Plan review timeline, the plan is anticipated to be adopted in Q3 of 2025². As such, limited weight can be applied to the plan.

1.13 Draft Policy 9 and 11 relate to development at Calne.

Policy 9: *Over the plan period (2020 to 2038) approximately 1,230 homes and 5.1 ha of employment land will be provided at Calne, including new allocation for approximately 570 dwellings and 0.5ha employment land on Land to the North of Spitfire Road.*

Policy 11: *Land to the north of Spitfire Road, Calne, as identified on the Policies Map, is allocated for the development of approximately 570 dwellings, local centre, a site of at least 0.3ha for an 80 place nursery, and 0.5ha employment land for office use.*

Policy 67 (Sequential test and retail impact assessment) and **Policy 68** (Managing town centres) set out general policies to safeguard and promote the vitality and viability of town centres, including Calne.

Primary Catchment Area

1.14 For the purpose of both the sequential assessment and the retail impact assessment, it is necessary to first define a Primary Catchment Area (PCA) of the proposal. A map of the PCA is attached at **Appendix 2**. As any retail development broadly competes with like for like facilities, it is relevant to note that there are three out of town developments of a similar nature to the development within approximately a 15 minute drive³. These are all to the south of Calne and include:

- V&P Collins Farm Shop, 81-83 Devizes Rd, Bromham, Chippenham SN15 2DZ
- Netherstreet Farm, Chippenham SN15 2DS
- The Piggery Farm Shop, West End Farm, Devizes SN10 2LL.

1.15 We would anticipate that 15 minutes is likely to be the maximum amount of time that people would drive to visit a farm shop of the type proposed. Within this 15-minute drive time, there is only one Market Town (as defined in Core Policy 1), which is Calne, and this should be the focus of the sequential and retail exercise. However, for robustness, we have also undertaken a sequential assessment and health check of Devizes, which sits just beyond the 15-minute drive time to the south.

1.16 There are no other Market Towns or Local Service Centres within or close to the 15-minute drive time.

² [The Local Plan review - Wiltshire Council](#)

³ [Travel Time Map | Drive Time Radius & Other Modes](#)

2.0 Sequential Test

- 2.1 This planning application proposes a farm shop and café (Use Class E) with associated parking on land near Calne Wiltshire SN11 8QJ.
- 2.2 In accordance with Paragraph 91 of the NPPF and policy 38 of the Wiltshire Core Strategy, a sequential assessment of sites has been prepared to support the application and understand whether it can be accommodated within or on the edge of the existing defined centre boundaries.
- 2.3 This section of the document addresses the sequential assessment, first dealing with the scope of the assessment and defining its interpretation through case law; followed by an assessment of any sequentially preferable sites.
- 2.4 Section 3 of this document then considers the proposed development in relation to national and local retail planning policy in line with guidance set out in Section 7 of the NPPF entitled 'ensuring the vitality of town centres' and provides a Retail Impact Assessment to determine the impact of the development on the vitality and viability of nearby centres and future public or private sector investment.

The Requirement for the Sequential Assessment

- 2.5 The application is for a farm shop and café (Use Class E), together with back of house areas and associated parking. As the site is located approximately 3.5km away from the nearest defined centre for retail purposes, which is Calne Market Town, it is necessary to demonstrate compliance with the sequential approach outlined in paragraphs 91 and 92 of the NPPF. Consequently, it is necessary to demonstrate that there are no suitable, available and viable sequentially preferable sites that could accommodate the proposed development in accordance with the relevant provisions of both local and national planning policy. On the basis that the proposed farm shop is associated with a nearby working farm which produces many of the products to be sold on site in the farm shop, it is uneconomic to seek to separate the proposed development from the remainder of the site by too great a distance. Nevertheless, a robust approach has been taken to undertaking a sequential assessment.

Case Law

- 2.6 It is important at the outset to correctly interpret and apply the sequential test, considering best practice and relevant appeal decisions. The NPPF has removed the specific need to address disaggregation and is supported by the absence of any reference to disaggregation in the updated Planning Policy Guidance Notice issued in 2020.
- 2.7 Case law on the issue of disaggregation and the sequential approach can be summarised as follows:

- The Supreme Court Decision in 2012⁴ re Dundee established as a matter of law, that a site has to be suitable for the commercial needs of the operator and that provided that flexibility has been shown in terms of format and scale then a proposed development should not have to be altered or reduced to fit a site.
- The English application of Dundee was established in 2012 through High Court case of North Lincs.⁵ The decision maker is 'bound' to take the Applicant's assessment that a site is neither commercially viable nor suitable for their commercial requirements.
- 2014 Rushden Lakes High Court Decision⁶ established that the Secretary of State agrees that the sequential assessment relates to the accommodation of the proposal.
- The more recent Scotch Corner decision (2016)⁷ also a Secretary of State decision established that there was no express requirement to disaggregate the scheme and that the sequential test seeks to determine whether if what is proposed can be accommodated on a town centre or sequentially preferable site.

2.8 As such, in considering the requirements of the sequential test, we have considered the application proposals as a whole, whilst applying a reasonable degree of flexibility in terms of scale and format, as required by national policy.

The Scheme to be Assessed

2.9 The context for the sequential assessment is that the farm shop and café building would have a proposed overall new area of 1081 sq.m. Of the total building area, 554 sq.m. will be customer accessible, and will consist of a farm shop (283 sq.m) cafe seating including the mezzanine cafe seating area (221 sq.m.) and a takeaway coffee facility (50 sq.m.). In addition, the store is to be served by a car park consisting of 69 spaces, including 5 accessible spaces.

Methodology

2.10 The parameters for the sequential search are set out below.

Size Requirements	
Minimum suitable site area	1.86 hectares for a standalone store with car parking for 73 cars ⁸

⁴ Tesco Stores Limited v Dundee City Council (Scotland) (2012) UKSC 13, 21 March 2012).

⁵ R. [on the application of Zurich Assurance Limited trading as Threadneedle Property Investment] v North Lincolnshire Council and Simon Developments Limited [2012] EWHC 3708 [Admin].

⁶ Land adjacent to Skew Bridge Ski Slope, Northampton Road, Rushden decision dated 11 June 2014 (reference APP/G2815/V/12/2190175).

⁷ Land at Scotch Corner, North Yorkshire, "called-in" application decision dated 1 December 2016 (reference APP/V2723/V/15/3132873 and 16/3143678).

⁸ In accordance with Appendix C – Maximum Parking Standards – of Wiltshire Car Parking Strategy

Unit Size	906.5 sq.m to include necessary back of house space (+/- 10%)
Vacant Units (for conversion/occupation)	Units at least 90% of the proposed unit size
Other Requirements	
	A site that can allow for the safe access and manoeuvring of customer vehicles.
	A site that is able to offer adjacent surface level car parking (or multi-storey with appropriate lifts)
	A site that can accommodate a dedicated service area and associated HGV manoeuvres and deliveries.
	A single storey unrestricted sales floor which benefits from a generally level topography, or which has the ability to be developed as such.

- 2.11 As set out above, case law confirms that the sequential search has to assess sites for the development that is proposed.
- 2.12 Vacant sites were identified through online marketing databases such as Rightmove, Property link, Zoopla, PrimeLocation and OnTheMarket and through the online websites of commercial agents such as Carter Jones, Stibbard Property and Fielder and Jones. DPP also looked for potentially vacant units as part of the physical health checks undertaken in August 2025.
- 2.13 DPP also reviewed Local Plan allocations within or on the edge of defined centres in the sequential search area.
- 2.14 Thus, in accordance with the retail hierarchy, the following centres were assessed:
- Market Towns:
 - Calne
 - Devizes
- 2.15 Any identified sites were then assessed based on their capacity to accommodate the proposed development **as a whole** in accordance with the 'Dundee' approach cited above. Any site that is not capable of accommodating the proposed development, in terms of physical size, cannot be considered suitable.
- 2.16 Should any sites be found to be suitable, they will also need to be sufficiently available and viable for development. For example, sites must be actively marketed as available for development/occupation.

- 2.17 It should be noted that the Core Strategy is inconsistent in terms of how the policies maps define centres. The development plan policies map provides two boundary definitions for Calne town centre, a primary frontage and a secondary frontage. The primary frontage covers a small area across Phelps Parade whilst the secondary frontage covers the southern end of Wood Street, High Street, The Strand, Church Street, Mill Street, The Pippin and the western end of Oxford Street. The wider secondary frontage was used as the boundary for the Health Check whilst the sequential assessment checked for sites/units up to 200m from the defined boundary.
- 2.18 By contrast, the development plan policies map provides a single boundary for Devizes, which is denoted as a Prime Shopping Area (ED18). The Prime Shopping Area covers eastern Market Place, Little Brittox, north-eastern High Street and Maryport Street. The Prime Shopping Area was used as the boundary for the Health Check and the sequential assessment (+ 200m). Retail units within 'Ginnel Shops' and the 'Old Swan Yard' laneways were also included in the Health Check and the sequential assessment (+200m).

Sequential Sites

Calne Market Town

- 2.19 Our physical health check discovered that there were six vacant commercial properties within or on the edge of Calne Market Town. Four of these properties are listed online:
- Unit 1, Orchard Lodge, The Pippin, Calne, SN11 8RN ([The Pippin, Calne](#)) - This property is advertised to let. The unit is 57 sq.m in size. The property is not suitable due to its limited size.
 - Unit 3, Orchard Lodge, The Pippin, Calne, SN11 8RN ([The Pippin, Calne](#)) - This property is advertised to let. The unit is 73 sq.m in size. The property is not suitable due to its limited size.
 - Church Lane, Calne District Centre, SN11 ([Church Lane, Calne](#)) - This property is advertised for sale. The unit is 476 sq.m in size. The unit has planning permission for conversion to two shops, five workshops and nine offices. Although the unit size could accommodate the farm shop and café elements of the proposal, there is insufficient space to accommodate the associated 'back of house' areas, such as the butchery and the kitchen and prep areas for the café. As such, this unit is too small and is therefore not suitable in sequential terms.
 - 5 The Strand, Calne, SN11 ORB ([The Strand, Calne](#)) - This property is advertised to let. The unit is 109 sq.m in size. The property is not suitable due to its limited size.
- 2.20 A further two properties were vacant but had no advertising and were not available online. These included:
- Unit 3, Wood Street (formerly T&E's Craft and Hobby Store). The property cannot be considered available as it is not advertised for sale or lease.
 - 11 High Street, Calne (formerly Lloyds Bank). The property cannot be considered available as it is not advertised for sale or lease.

- 2.21 Given the above, there are no vacant sites within or on the edge of Calne Market Town that are suitable, available or sequentially preferable.

Devizes Market Town

- 2.22 There were seven vacant commercial properties available within or on the edge of Devizes Market Town that were advertised online and with signage present during the health check:

- 37, Market Place, SN10 (37 Market Place) - This property is advertised to let. The ground floor retail unit is 37 sq.m in size. The property is not suitable due to its limited size.
- 7, Little Brittox, Devizes, SN10 (Little Brittox, SN10) - This property is listed as a retail premises to let. The listed size is approximately 62 sq.m. The unit is listed grade II. The property is not suitable due to its limited size.
- The Brittox, Devizes, SN10 (The Brittox, SN10) – This property is listed as a retail premises to let. It was formerly New Look. The listed size is 161 sq.m. There is rear access to Central Car Park and space for two cars to park directly behind the unit. The property is not suitable due to its limited size.
- Market Place, Devizes, SN10 (Market Place, SN10) - This property is listed as a retail premises to let. The listed size is approximately 47 sq.m. The property is not suitable due to its limited size.
- Market Place, Devizes, SN10 (Market Place, SN10) - This property is listed as a commercial premises to let. The listed size is approximately 76 sq.m. The premises comprise a ground floor entrance hall, first floor restaurant and a top floor two bed flat. The property is not suitable due to its limited size.
- 16a Maryport Street, (Maryport Street, SN10) - This property is listed as a commercial premises to let. The listed size is approximately 23 sq.m. The property is not suitable due to its limited size.
- 31 Maryport Street, SN10 (Maryport Street, SN10) - This property is listed as a commercial premises to let. It was formerly Scope. The listed size is 45 - 170 sq.m. The property is not suitable due to its limited size.

- 2.23 In addition to this, four properties were found vacant during the health check but there was no advertising signage and the properties could not be located online:

- 8, Little Brittox (formerly the Little Bakehouse). The property is considered not to be available as it is not advertised for sale or lease.
- 20, The Brittox (formerly Tenovus). A listed building consent is in the window dated October 2024. The property is not considered available as it is not advertised for sale or lease.
- 17, Maryport Street (formerly Costa Coffee). The property is not considered available as it is not advertised for sale or lease.
- 5, Maryport Street (formerly Halifax). The property is not considered available as it is not advertised for sale or lease.

2.24 A further commercial property was advertised online and found vacant during the health check but without advertising signage:

- 8-12 High Street, Devizes, SN10 ([High Street, SN10](#)) - This property is listed as a retail premises to let. It was formerly Wilko. The ground floor listed size is approximately 740 sq.m. Whilst this is a significant sized unit, it could not accommodate the required back of house space for butchery, kitchen prep and servery and warehouse. As such, it could not accommodate the proposed development, even with an element of flexibility and therefore, can be discounted in sequential terms.

2.25 Given the above, there are no sites within or on the edge of Devizes Market Town that are available, suitable or sequentially preferable.

Local Plan Allocations

Emerging Wiltshire Local Development Plan

2.26 The Emerging Wiltshire Local Development Plan proposes one new Local Centre within a 15-minute drivetime of the proposal site.

2.27 Land to the north of Spitfire Road, Calne (Policy 11) is allocated for the delivery of a residential led development of approximately 570 homes and includes a new local centre to serve the new community, along with a small element of onsite employment and retail.

2.28 A concept plan for Land to the north of Spitfire Road is shown in Figure 1.

2.34 As a result, it is considered that the sequential test is passed.

3.0 Retail Impact Assessment

Introduction

- 3.1 Paragraph 94 of the NPPF advises that retail applications outside of designated retail centres should be accompanied by a retail impact assessment if the proposed floorspace is greater than 2,500sq.m, unless a locally set floorspace threshold is set.
- 3.2 The NPPF requires an assessment of the impact on existing, committed and planned public and private investment in a centre or centres, and the impact of the proposal on town centre vitality and viability, including local consumer choice and trade.
- 3.3 As set out previously, Core Policy 38 of the Wiltshire Core Strategy requires an assessment of impact for all retail proposals in out-of-centre locations, which exceed 200 sq.m. gross.

Methodology

- 3.4 Paragraph 2b-017 of the NPPG sets out a step-by-step approach in the preparation of Retail Impact Assessments, as follows:
 - Establish the state of existing centres;
 - Establish existing shopping patterns and the no development scenario;
 - Determine the appropriate time frame for assessing impact focusing on the first 5 years;
 - Assess the proposal's likely turnover;
 - Set out the likely trade draw of the proposal; and
 - Consider the likely impact of the proposal.
- 3.5 Reference has been had to the Wiltshire Retail and Town Centres Study (Avison Young – 2020 - 'The Retail Study') in the preparation of this Impact Assessment. On this basis, all values in this report are expressed in a constant 2018 price base, for parity. A number of retail tables accompany this report and are contained at **Appendix 1**. In accordance with NPPG, impact of at least 5 years ahead has been assessed. As such the 'base' year is 2025, whilst impact has been tested at 2030.
- 3.6 For clarity, this impact assessment has been undertaken on a convenience (food and every day domestic items) goods basis as the majority of the farm shop will be given over to food products. The café area is not classed as retail and turnover figures for such uses are not publicly available. As such, the impact assessment is effectively predicated on all of the proposed floorspace available to the public being retail and is, therefore, very much a worst case scenario.
- 3.7 It is noted that Tables 12 of the Retail Study do provide Food and Beverage per capita expenditure figures, Household survey results and resultant turnover and capacity figures for each centre. Whilst we have not sought to update these figures using the latest growth rates, we make reference to them where relevant.

Study Area

- 3.8 As set out earlier in this report, there is no firm guidance on the extent of a catchment area for a proposed development, however it is reasonable to establish a catchment area based on the type of development proposed, the context of the surrounding area (including existing shopping provision) and the scale of the development.
- 3.9 In this context, the proposed development is for the creation of a new farm shop and café in an out-of-centre location means that most, if not all customers would access it by car. It is also assumed that such a proposal would have a relatively wide catchment area. As set out above, the Primary Catchment Area for is based on a 15-minute drive time. In retail impact terms however, it is accepted that the proposal would divert trade from competing facilities that are further away and more distant centres will be captured in terms of the impact assessment. In order to be able to undertake the necessary quantitative assessment, we have therefore used **Zones 23A and 15** of the Retail Study (see plan at Appendix 1 of that Study) as the **Study Area** forming the basis of the assessment.

Population and Expenditure

- 3.10 In terms of establishing the amount of available expenditure within a determined area, the application site sits within **Zone 23A Calne** whilst the natural catchment area of the proposal extends into part of **Zone 15 Devizes**. On this basis, resident and projected population and corresponding comparison expenditure figures for Zones 23A and 15 are contained within **Tables 1-3** in Appendix 1. These show an overall increase in population in both zones. The 2020 base figures for per capita convenience expenditure in both zones have been taken directly from Table 2A (Appendix 2) of the Retail Study. However, as set out in Retail Planner Briefing Note (RPBN) 22 (March 2025), there has been negative growth in convenience expenditure between 2020 and 2025 and this is forecast to decline, albeit at a lower level. This is due to a variety of factors post Covid, including global economic uncertainty, UK interest rates not falling as quickly as expected, and inflation. Table 2A shows the resulting drop in per capita expenditure up to 2025 and beyond. It is also necessary to discount spending not in physical stores (Non Retail Forms of Trading NRFT), i.e. online spending. This reduction is not as marked as in comparison goods but is shown to rise from 5.1% in 2020 up to 6.8% by 2036. This is shown in Table 2B. Table 3 shows the resulting total available convenience expenditure in the two zones; the reduction in per capita spending is offset by the slight increase in population and thus is showing a total available convenience expenditure figure of £119.9m in 2025, compared to £120.4m in 2030, before dropping off again very slightly to £120.2m in 2036.

Turnover of the Proposed Development

- 3.11 In order to assess the likely impact of the proposal it is necessary to estimate its turnover, which will then be achieved by diverting turnover from other, existing facilities. **Table 4** at Appendix 1 shows this. The turnover figure for the development has been provided by the Applicant and then projected forward using the RPBN as per the footnote to the table. Due to the sluggish comparison growth rates, the estimated turnover drops slightly from £2.74m in 2030, to £2.73m in 2036.

Existing Shopping Patterns

- 3.12 The Retail Study provides insight into existing convenience shopping patterns, from the Household Survey data which underpins it. It also looks at Food and Beverage spending patterns. Table 4 at Appendix 3 looks specifically convenience market shares, whilst Table 12i does the equivalent exercise for Food and Beverage. The findings are summarised below:

Zone 23A Destinations	Main Convenience Shopping Choice, Food) (Food) (First Choice)	Top Up Food Shopping (First Choice)	Food and Beverage (Daytime Visits)
Calne	70.3%	78.4%	48.3%
Devizes	3.2%	1.2%	1.7%
Chippenham	15.6%	9.6%	24.9%
Marlborough	1.0%	0.9%	5.1%
Melksham	0.7%	3.2%	1.2%
Zone 15 Destinations	Main Food) Convenience Shopping (Food) (First Choice,	Top Up Food Shopping (First Choice)	Food and Beverage (Daytime Visits)
Devizes	70.9%	81.1%	58%
Trowbridge	9.2%	0%	6.1%
Melksham	4.7%	1.4%	1.3%
Chippenham	0.7%	2.3%	1.3%
Calne	1.9%	0%	0%
Westbury	1.4%	0%	0%

- 3.13 As can be seen, both Calne and Devizes perform a strong local convenience shopping function, in addition to being popular destinations for food and beverage, for residents living in the respective

zones that those centres are located in. Although not shown above, Table 4 of The Retail Study also shows that both centres perform relatively localised functions and do not draw in trade from residents who live in zones further afield. Calne is not a destination for residents in any other zones apart from the two adjoining zones of 22 and 23B, and zones 24 and 15, within which it accounts for a very small percentage of shopping trips. The figures for visits to Calne from Zone 15 are shown in the summary table above.

- 3.14 Devizes has a slightly less concentrated pattern. Table 4 of The Retail Study shows that 24.2% of residents living in Zone 14 use it for their main food shop, as well as 7.6% from Zone 13. Visits to Devizes from Zone 23A are shown in the summary table above and are low, at 3.2% for main food and 1.2% for top-up.
- 3.15 Outside of the main centres, smaller centres, village, and other farm shops are not captured by the Household Survey. In Zone 23A, popular individual destinations include the Tesco superstore at Beversbrook Road, Calne (38%), whilst in Zone 15, Morrisons at Estcourt Street dominates (42.9%).
- 3.16 Table 5 at Appendix 1 takes these existing shopping patterns to inform Trade Draw assumptions, in order to then be able to look at potential retail impact in a slightly more fine-grained way. On the basis that there are a number of farm shops in the south of the Primary Catchment Area, we have assumed that 60% of the proposed development's turnover will come from residents living in Zone 23A (Calne) with 30% coming from residents living in Zone 15. The shopping patterns above with the remaining 10% coming from residents who live beyond the PCA.

Turnovers

- 3.17 Using the Retail Study base data, convenience goods turnover of the main stores and centres are shown in **Table 6** at Appendix 1. Whilst the base turnover figures are taken directly from Table 5A of The Retail Study, turnover figures have then been projected forward using up to date growth rates from RPN22; as such 2025 and 2030 turnover figures differ from those shown within the Retail Study and are more accurate. As per previous comments, these actually shown a slight decline in centre turnovers over the period. As per the notes to Table 6, it should also be noted that the Retail Study total turnover figures for Centres actually includes out of centre foodstores, which is erroneous. We have excluded these with a resultant reduction in estimated town centre turnovers.

Trade Diversion and Impact

- 3.18 The assessment of trade diversion can be seen in Table 7 at Appendix 1. In considering trade diversion, a number of commonly held assumptions underpin it:
 - Like competes with like – so stores operating in the same segment of the market will have trade diverted from them;
 - Farm shops are, by their nature, a feature of the rural economy and are widely accepted as being complimentary to main town and district centres;

- Customer shopping patterns are influenced by proximity to home and ease of access;
- 3.19 Table 7 has regard to the shopping patterns summarised at paragraph 3.13 above and, in particular, the relatively localised catchment areas of both Calne and Devizes in terms of convenience food shopping. From these shopping patterns an assessment has then be made as to how likely people are to divert to the application proposal, based on distance from home and range of goods on offer.
- 3.20 In terms of people living within Zone 23A, which includes both the application site, and Calne Market Town, it has been assumed that 18% of the proposed development's overall turnover will be diverted from existing facilities within the town centre, with the Sainsbury's foodstore accounting for 15% of that. This reflects the fact that the Sainsbury's food offer aligns more closely with that of a farm shop than Iceland. Only 1% of the proposed development's turnover is considered likely to be drawn from other shops within the town centre. Our Health check of the centre (see below) only identified one convenience shop unit which is occupied by a greengrocers; however, there are a number of restaurants and cafes and some trade may be diverted from them.
- 3.21 The Household Shopping survey shows extremely limited visits to Devizes from residents in Zone 23A; however some trade diversion from the Marks & Spencer foodhall is likely, as well as the centre's cafes and restaurants. The remainder of trade will be diverted from the popular out of centre food stores which show dominance within the Household Survey. There are also a number of farm shops in the PCA, which for the most part are located in Zone 15. Whilst there is no available information on shopping patterns to these facilities, it is fair to assume that people in Zone 23A are currently driving south to visit these facilities, and as such may no longer do so in view of the location of the proposed development between them and existing farm shop facilities.
- 3.22 Turning to Zone 15, lower trade diversion from facilities is anticipated within this zone; residents will continue to have access to a good variety of similar out of centre farm shops and hence may not choose to drive further to visit the application site. They also have access to a larger centre, in the shape of Devizes which is anchored by a Marks & Spencer foodhall. Again, it is likely that the competing farmshops will have the most trade diverted from them, alongside the key convenience shopping destination of Morrisons and Sainsbury's in and around Devizes.

Impact on Vitality and Viability

- 3.23 Health checks of Calne and Devizes are attached at Appendix 2. These have been undertaken in line with the indicators set out in national planning guidance. As can be seen, both of the centres are considered to be relatively healthy in terms of vitality and viability. This is reinforced by the findings of the Retail Study and both centres show a marked improvement in terms of vacancy levels (all of which are below the national average), number of units and anchor tenants. As such, the very low levels of impact shown in Table 7 do not constitute impact of a significant adverse level on either centre.
- 3.24 It should also be noted that the turnover of Calne and Devizes shown in the tables only relates to convenience goods turnover. The actual turnover of the centres will be higher once comparison (non-food) goods turnover is included. Table 7A of the Retail Study shows the comparison turnover

of Calne at 2020 to be £18.5m, whilst the equivalent figure for Devizes is £59.1m. Both centres have a strong comparison and service role and if the trade diversion figures in Table 7 were to be applied to total turnover figures for either centre, this would result in impact so negligible it probably could not be recorded. It should also be noted that the service sector, which includes cafes, restaurants and pubs are not included in any turnover figures but are accounted for in the turnover figure of the proposed development, with these elements given a retail sales density figure. As such, the percentage impact levels shown in the Table are artificially high and very much represent a worst-case scenario.

Impact on Future Investment

- 3.25 Neither the adopted Core Strategy, or the Regulation 19 Local Plan Review specifically identify any development proposals within Calne or Devizes Town Centres. In terms of Calne, Policy 9 of the Local Plan review states that development will be supported by the implementation of a Town Centre Masterplan. It does not appear that such as Masterplan has yet been prepared. The only allocation is that previously referred to north of Spitfire Road; however this is a medium-term objective and, as set out, the intention is clearly for its retail element to comprise a local convenience store and other units which would serve the new residents. The provision of a farm shop in a rural location, which would be a destination shop on an ad hoc/infrequent basis would not threaten or undermine the delivery of this element of that proposed allocation.
- 3.26 Neither of the made Neighbourhood Plans for Calne or Devizes identify any site for development, or contain any policies specifically aimed at regeneration. In this context, and in the context of the Health Check findings, it is concluded that the application proposals will not have a significant adverse impact on any planned future public or private sector investment.

4.0 Summary and Conclusion

- 4.1 The Sequential and Retail Impact assessment has been prepared to support a planning application for a proposed Farm Shop and Café, in accordance with national Planning guidance and Core Policy 38 of the Wiltshire Core Strategy .
- 4.2 The sequential assessment has demonstrated that there are no sequentially preferable sites, in either availability or suitability terms, within or on the edge of any designated centres in the PCA. Case law that requires a site to be able to accommodate the development that is being proposed, or 'something similar' should be remembered by the decision maker. In any event however, our assessment has included a thorough review of all available units that could accommodate different components of the scheme.
- 4.3 The assessment has confirmed that the impact on the designated centres within the PCA, as well as more distant locations, would be negligible and would not harm the vitality and viability of those centres. The majority of the application proposal's turnover will be derived from trade diverted from key out-of-centre facilities within the PCA, other farm shops, and facilities within the two centres which cater for the more luxury end of the food shopping market. We are also unaware of any impact on existing, planned or committed private or public sector investment in any of these centres that would be impacted. Conversely the proposed development constitutes a major investment and will increase consumer choice within the area.
- 4.4 Overall, it is considered that both the sequential test and the Retail Impact Assessments as set out within the NPPF has passed. On that basis there can be no objection to the proposal on retail policy grounds.

Table 1: Population

Zone	2020	2025	2030	2035	2040	2045	2050	2055
Zone 23A (Callie)	24,678	25,478	26,278	27,078	27,878	28,678	29,478	30,278
Zone 23B (Callie)	35,129	36,129	37,129	38,129	39,129	40,129	41,129	42,129
Zone 23C (Callie)	33,900	34,900	35,900	36,900	37,900	38,900	39,900	40,900
Total	84,668	86,668	88,668	90,668	92,668	94,668	96,668	98,668

Notes

Population data sourced from Whitireia Retail and Town Centre Study 2020 - Table 1, Population by Zone - of Appendix 2

Table 2a: Per Capita Convenience Expenditure (£)

Zone	2020 Base	2025	2030	2035	2040	2045	2050	2055	2060
Zone 23A (Callie)	£2,410	£2,450	£2,490	£2,530	£2,570	£2,610	£2,650	£2,690	£2,730
Zone 23B (Callie)	£2,420	£2,460	£2,500	£2,540	£2,580	£2,620	£2,660	£2,700	£2,740

Notes

2020 per capita expenditure figures taken from Table 2A Appendix 2 of Whitireia Retail Study 2020-2030 figures based on growth rates taken from Experian Retail Planner Briefing Note 22 (March 2025) Appendix 4A; Growth rates spending per head

2018 Prices

Table 2b: Per Capita Convenience Expenditure (£) Adjusted for INRT

Zone	2020 Base	2025	2030	2035	2040	2045	2050	2055	2060
Zone 23A (Callie)	£2,410	£2,257	£2,104	£1,951	£1,797	£1,644	£1,491	£1,338	£1,185
Zone 23B (Callie)	£2,420	£2,267	£2,114	£1,961	£1,807	£1,654	£1,501	£1,348	£1,195

Source: Reduction for Non Retail Forms of Trading taken from yearly rates contained in Experian Retail Planner Briefing Note 22 (March 2025), Appendix 3, Figure 5; Adjusted for SFT sales from stores' column.

Table 3: Total Convenience Goods Expenditure (£m)

Zone	2020	2025	2030	2035	2040	2045	2050	2055	2060
Zone 23A (Callie)	51,102.221	50,855.487	50,608.253	50,361.019	50,113.785	49,866.551	49,619.317	49,372.083	49,124.849
Zone 23B (Callie)	68,806.075	69,524.514	70,242.953	70,961.392	71,679.831	72,398.270	73,116.709	73,835.148	74,553.587
Total	119,908.296	120,380.001	120,851.206	121,322.411	121,793.616	122,267.821	122,741.026	123,214.232	123,688.436

Notes

Notes 1, multiplied by Table 2b

2018 Prices

Table 4: Turnover of the Proposed Development (£m)

	Retail Floorspace (sqm)	Turnover at 2020 (£m)	Turnover at 2021	Turnover at 2022	Turnover at 2023	Turnover at 2024	Turnover at 2025	Turnover at 2026	Turnover at 2027	Turnover at 2028	Turnover at 2029	Turnover at 2030	Turnover at 2031	Turnover at 2032	Turnover at 2033
Proposed															
Proposed Farm Shop, Café seating area and takeaway coffee	554		0.00	0.00	0.00	0.00	2.74	2.74	2.74	2.74	2.74	2.74	2.74	2.74	2.73
Total		6.65	6.14	5.77	5.64	5.51	2.74	2.74	2.74	2.74	2.74	2.74	2.74	2.74	2.73

2018 Prices

Table 5: Trade Draw

Zone	Percentage of Turnover	Turnover at 2030 £m
Zone 23A (Calne)	60%	1.64
Zone 15 (Devizes)	30%	0.82
Beyond	10%	0.27
Total	100%	2.74

Notes

Turnover of Proposed Floorspace provided by Applicant at current prices Converted to 2018 price Base using Price Indices in Appendix 4B of RPNB 22.
Sales density growth applied from 2020 as per Experian Retail Planner Briefing Notes 20, 21, and 22 Figure 4a - 'Retail Sales Density for Convenience Goods - Including Changes to Floorspace'

Table 6: Total Convenience Goods Turnover of Main Centres and Facilities

Centre	Household Survey Based Turnover 2020 (£m)	Turnover 2021 (£m)	Turnover 2025 (£m)	Turnover 2030 (£m)	Turnover 2036 (£m)
Centres Within Study Area					
Calne Market Town					
Iceland, Phelps Parade	5.5	5.08	4.55	4.55	4.53
Sainsbury's superstore, the Pippin	17.0	15.69	14.07	14.07	14.00
Local Shops, Calne town Centre	0.7	0.65	0.58	0.58	0.58
Other	0.4	0.37	0.33	0.33	0.33
Total	23.6	21.78	19.53	19.53	19.43
Devizes Market Town					
Iceland, the Brittox	1.8	1.66	1.49	1.49	1.48
Marks & Spencer Food, Monday Market Street	2.6	2.40	2.15	2.15	2.14
Local Shops, Devizes Town Centre	3.3	3.05	2.73	2.73	2.72
Other	2.1	1.94	1.74	1.74	1.73
Total	9.8	9.05	8.11	8.11	8.07
Out-of-Centre Convenience Facilities in the Study Area					
Tesco Express, Harrier Close, Calne	5	4.62	4.14	4.14	4.12
Tesco Superstore Beverbrook Road, Calne	22.4	20.68	18.53	18.53	18.44
Lidl, London Road, Devizes	16.8	15.51	13.90	13.90	13.83
Morrisons, Estcourt Street	34.3	31.66	28.38	28.38	28.24
Sainsbury's Superstore, Monday Market Street	16	14.77	13.24	13.24	13.17
Total	94.5	87.22	78.19	78.19	77.80
Overall Total within Study Area	127.9		105.8	105.8	105.3
Centres and Facilities Outside the Study Area					
Chippenham	199.4	184.05	199.20	199.40	199.20
Trowbridge	161.7	149.25	161.54	161.70	161.54
Melksham	99.8	92.12	99.70	99.80	99.70
Other Facilities					
Total Turnover					

Notes

All 2020 Household Survey Based Figures taken from Wiltshire Retail Study Table 5A Appendix 2. Note that foodstores not within Defined Town Centre boundaries are listed under 'Out-of-centre facilities' whereas in the Retail Study they

2020 Household Turnover figures taken directly from Table 5A of The Retail Study

Sales density growth applied from 2020 as per Experian Retail Planner Briefing Notes 20, 21, and 22 Figure 4a - 'Retail Sales Density for Convenience Goods - Including Changes to Floorspace'

Table 7: Convenience Trade Diversion and Impact

Centre	Turnover 2030(£m)	Convenience Trade Diversion from Zone 23A (£m)	% Trade Diversion Zone 23A (Calne)	Convenience Trade Diversion from Zone 15 (£m)	% Trade Diversion Zone 15 (Devizes)	Convenience Trade Diversion Beyond Study (£m)	% Trade Diversion Beyond	Total Trade Diversion	Turnover Post Development 2028(£m)	% Impact
Centres Within Study Area										
Calne Market Town			1.64		100.0%	0.82				
Iceland, Phelps Parade	4.55		0.03		2.0%	0.00		0.0%	0.03	4.52
Sainsbury's superstore, the Pippin	14.07		0.25		15.0%	0.02		2.0%	0.01	0.27
Local Shops, Calne town Centre	0.58		0.02		1.0%	0.00		1.0%	0.02	0.56
Other	0.33		0.00		0.0%	0.00		0.0%	0.00	0.33
Total	19.53				0.02			0.01	0.32	1.66%
Devizes Market Town										
Iceland, the Brittox	1.49		0.00		0.0%	0.02		2.0%	0.00	1.47
Marks & Spencer Food, Monday Market Street	2.15		0.13		8.0%	0.03		4.0%	0.01	0.18
Local Shops, Devizes Town Centre	2.73		0.00		0.0%	0.02		2.0%	0.01	0.27
Other	1.74		0.00		0.0%	0.00		0.0%	0.00	1.74
Total	8.11								0.22	7.89
Out-of- Centre Convenience Facilities in the Study Area										
Tesco Express, Harrier Close, Calne	4.14		0.16		10.0%	0.00		0.0%	0.00	3.97
Tesco Superstore Beversbrook Road, Calne	18.53		0.38		23.0%	0.04		5.0%	0.01	18.10
Lidl, London Road, Devizes	13.90		0.02		1.0%	0.04		5.0%	0.01	13.83
Morrisons, Estcourt Street, Devizes	28.38		0.02		1.0%	0.23		28.0%	0.03	0.27
Sainsbury's Superstore, Monday Market Street, Devizes	13.24		0.02		1.0%	0.10		12.0%	0.02	0.14
Pound Farm, The Hillocks, Lyneham, Chippenham					7.0%	0.06		7.0%	0.01	0.07
Netherstreet Farm					6.0%	0.03		4.0%	0.01	0.05
V & P Collins Farm Shop					5.0%	0.03		4.0%	0.02	0.05
The Piggery Farm Shop					4.0%	0.04		5.0%	0.02	0.06
Lower Fields Farm, Devizes Road, Devizes					4.0%	0.04		5.0%	0.02	0.06
Rowley Cow Farm Café					4.0%	0.07		5.0%	0.02	0.08
Total	78.19								0.00	
Overall Total within Study Area										
Centres and Facilities Outside the Study Area										
Chippenham	199.40		0.12		7.0%					
Trowbridge	161.70		0.00					6%		
Wells	99.80		0.00							
Other					1.0%			4%		
Total Turnover	1.13				0.78			0.23		
			100.0%		1.56			100%	0.46	100%

Appendix 2

Health Checks of Existing Centres

- 1.1 Within the PCA there are two market towns, consisting of Devizes and Calne. As such, these centres will be assessed as part of the retail assessment to determine their health.
- 1.2 For the purposes of the health check, the retail centres were assessed according to the Wiltshire Core Strategy (2015) policies maps:
 - Inset Map 6: Calne – The health check perimeter followed the Town Centre Secondary Frontage
 - Inset Map 11: Devizes – The health check perimeter followed the Prime Shopping Area.
- 1.3 These perimeters were chosen as they are what is understood to have been used as the retail site boundary for the Avison Young Wiltshire Retail and Town Centres Study (2020), and for the purposes of comparison it was decided to replicate their methodology. However, on completion of the health check the number of retail units counted in Devizes does not correspond with the Study, so it is assumed that a different boundary was used and that this was not made clear in the Study's methodology. In addition, it is noted that the boundaries are not well defined as regards to retail units that sit behind street facing units, for example those down side streets or laneways. For Devizes, the laneways of Ginnel Shops and Old Swan Yard were considered to be within the defined policy map retail boundary and so were included in the count.
- 1.4 All health checks were carried out by DPP on August 11th 2025. The weather was sunny and warm and, as such, the conditions are considered to be optimal.

Calne Market Town

- 1.5 Based on the above, Calne Market Town (including secondary frontage) consists of 91 units that provide a mix of retail/commercial services. The main convenience retail is Sainsbury's located centrally at the eastern end of the pedestrianised Phelps Parade. There was a mix of national retailers and independent shops with more independent retailers overall. National retailers were mostly concentrated within the pedestrianised Phelps Parade, with independent retailers present along High Street and Church Street.
- 1.6 The district centre is extremely accessible with two large car parks that provide plenty of parking spaces. Church Street is a 24 hour all day Council run Pay and Display car park with 75 spaces. Further to this there are approximately 100+ parking spaces provided by Sainsbury's which has a 2hr free parking limit. This parking is particularly convenient for Phelps Parade. There are bus stops located on the corner of Wood Street/High Street and The Pippin and therefore public transport provision and accessibility to the centre is good. There were a number of zebra and pelican crossings dispersed throughout the site making pedestrian accessibility relatively high.

- 1.7 There were six vacant units identified within the market town. Four of these properties were found to be marketed online. A further two properties were vacant but had no advertising and were not available online; these included a former craft store and a former national bank. This equates to a vacancy rate of 7.2%, which is considerably lower than the national average of 13.7% vacancies¹
- 1.8 Pedestrian activity was highest in Phelps Parade and also along Beach Terrace next to the Library when the site visit took place around 1pm. However, outside of these areas the retail offer is quite spread out, and so pedestrian flow is also dispersed.
- 1.9 Phelps Parade is pedestrianised and offers a wide high street. Outdoor seating, wayfinding and planters/hanging baskets in good condition are provided throughout this central retail area. However, despite these efforts by the Council this location does feel a little worn. The environmental quality of Phelps Parade diminishes to the west due to increased noise from vehicles movements on Wood Street and the A4 just beyond. It is covered by CCTV and feels safe as it is well trafficked by pedestrians and there is passive surveillance offered by the flats/premises above the ground floor retail. Outside of Phelps Parade, such as along High Street and particularly along Church Street, there is less sense that you are still within the core retail area.
- 1.10 DPP's health check is also supported by the Wiltshire Retail and Town Centres Study (2020), which draws similar conclusions. The 2018 health check found that the majority of the pedestrian flows are along Phelps Parade and to and from Phelps Parade and Sainsburys. The study highlights the importance of Sainsburys to the overall health and attractiveness of Calne. The study also supports the high level of accessibility to the centre due to the volume of car parking available.
- 1.11 Nine vacant units were found in the 2020 health check, which is more than was recorded in the present (2025) check which found six. The centre has increased its proportion of service retail offer, with convenience and comparison retail proportionally less than in 2020.
- 1.12 Overall, the district centre is considered to be healthy with six vacancies. It is serviced by a busy supermarket located in the centre and is complemented with a diverse range of retail/commercial services.

Devizes Market Town

- 1.1 Based on the above, Devizes Market Town (defined as the Prime Shopping Area) consists of 102 units that provides a mix of retail/commercial services. The main convenience retail is Marks and Spencers Foodhall located centrally at the eastern end of the pedestrianised The Brittox. Just beyond the core retail area to the east there is a Sainsburys (<200m distance) and a Morrisons (<300m distance). There was a mix of national retailers and independent shops with more independent retailers overall. National retailers were mostly concentrated within the pedestrianised Phelps Parade, and along The Market Place. Independent retailers are concentrated in laneways including Ginnel Shops (accessed from The Market Place) and Old Swan Yard (accessed from High Street and The Brittox).

¹ https://www.savills.com/research_articles

- 1.2 The district centre is extremely accessible by car. Devises benefits from a number of Council run Pay and Display car parks in and around the main retail centre, which includes accessibility spaces. The most central car parks include Market Place (76 spaces, maximum stay 2 hours), West Central (54 spaces, maximum stay 3 hours) and Central (161 spaces, maximum stay 3 hours). At the time of the survey West Central Car Park was half full and Market Place Car Park was three quarters full.
- 1.3 Some on street parking is also available centrally in 'Green Zone Parking' bays, which are available for 1 hour parking Monday to Saturday 8am-6pm.
- 1.4 There are bus stops located on The Market Place which are serviced by a high number of bus routes and therefore public transport provision and accessibility to the centre is good. Much of the town centre is pedestrianised, with access facilitated through zebra and pelican crossings in place on key desire lines into the centre.
- 1.5 There were twelve vacant units identified within the market town. Seven of these properties were found to be marketed online and with signage present during the health check. In addition to this, four properties were found vacant during the health check but there was no advertising signage and the properties could not be located online. A further commercial property was advertised online and found vacant during the health check but without advertising signage. This equates to a vacancy rate of 11.8%, which is slightly lower than the national average of 13.7% vacancies².
- 1.6 Pedestrian activity was highest along The Market Place and Little Brittox when the site visit took place around 10am.
- 1.7 Little Brittox and The Brittox are pedestrianised, with The Brittox in particular benefitting from a wide high street. Outdoor seating, wayfinding and planters/hanging baskets in good condition are provided throughout this central retail area which feels pleasant. The environmental quality of The Brittox diminishes to the east due to increased noise from vehicles movements on Maryport Street and the A361 just beyond.
- 1.8 DPP's health check is also supported by the Wiltshire Retail and Town Centres Study (2020) which draws similar conclusions. The 2020 health check found the highest levels of pedestrian flow in Sidmouth Street, the Brittox and Market Place. It notes that the pedestrianized nature of the Brittox assists with the ease of pedestrian movement in this part of the town centre. It also notes that the quality of the public realm is very good which adds to the overall attractiveness of the centre.
- 1.9 Fifteen vacant units were found in the 2020 health check. The present (2025) health check found twelve vacant units, but it is highlighted that the retail centre boundary used by Wiltshire Retail and Town Centres Study (2020) is not consistent with the number of units recorded and therefore it is not possible to draw a reliable comparison between the health checks.

² https://www.savills.com/research_articles

- 1.10 Overall, Devizes Market Town is considered to be healthy with twelve vacancies. It has a diverse range of retail/commercial services, and has a strong independent retail offer that is supported by an attractive and historic built environment and public realm.

Conclusion

- 1.13 Overall, DPP have found that the centres within the catchment are healthy.