

ERECTION OF: (i) 1 NO. RETAIL CONVENIENCE STORE (CLASS E), 3 NO. FLEXIBLE RETAIL UNITS (CLASS E), AND ROADSIDE DRIVE THROUGH UNIT (SUI GENERIS); (ii) A 64-BED CARE HOME (CLASS C2); AND (iii) 249 NO. RESIDENTIAL DWELLINGS (CLASS C3) WITH ASSOCIATED ACCESS, GREEN AND BLUE INFRASTRUCTURE WORKS

HAWKE RIDGE BUSINESS PARK, WESTBURY, BA13 4LD

RETAIL ASSESSMENT

JULY 2026

grassroots PLANNING

Bristol North Baths
Gloucester Road
Bristol
BS7 8BN

t: 0117 930 0413 w: grassroots-planning.co.uk

REPORT CONTROL

Project:	Hawke Ridge Business Park
Report Type:	Retail Assessment
Client:	Hawke Ridge Business Park Ltd and Bellway Homes Ltd
Our Reference:	961/A5/AW
Date:	July 2026
Version:	V1

COPYRIGHT

This document must not be copied or reproduced in whole or in part without the written consent of
Grass Roots Planning Ltd

1.0 INTRODUCTION

- 1.1 On behalf of the applicant, Hawke Ridge Business Park Ltd and Bellway Homes Ltd, Grass Roots Planning has been instructed to prepare a Retail Assessment to satisfy the retail sequential and impact ‘tests’ in support of a full planning application for the erection of: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works at Hawke Ridge Business Park, Westbury, BA13 4LD.
- 1.2 The site lies within the administrative boundary of Wiltshire Council.
- 1.3 This full planning application follows the grant of an original outline planning application for the formation of a new business park, access and associated works (ref. 14/03118/OUT), which was varied through application ref. 15/04092/VAR. The outline planning permission (ref. 15/04092/VAR) was implemented through the construction of the four-arm roundabout and associated landscape works, and various associated reserved matters applications were submitted and remain extant.
- 1.4 Furthermore, this application also follows the grant of full planning permission (ref. 16/12236/FUL) for the erection of 1 drive through retail unit (formally Class A5/A3); 3 retail units (formally Class A5); and 1 convenience store (formally Class A1) and associated works. The 2016 application proposed a very similar development to that now being proposed through this application, and was granted planning permission in April 2017 where the retail sequential and impact tests were passed. Although the 2017 permission has since lapsed, we are not aware of any overriding changes that should alter the position.
- 1.5 This Retail Assessment should be read in conjunction with the Planning Statement, Environmental Statement, and other documents and plans submitted in support of this planning application.

Retail Context

- 1.6 National planning policy applying to proposals involving retail development is set out at Paragraphs 90 – 95 of the National Planning Policy Framework (NPPF, 2025).
- 1.7 Paragraph 91 of the NPPF 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 not in accordance with an up-to-date plan.

- 1.8 Paragraph 94 of the NPPF states that *“when assessing applications for retail and leisure development 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 locally set threshold, the default threshold is 2,500 sq m of gross floorspace).”*
- 1.9 Notwithstanding, Core Policy 38 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 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 The application site is not located within a designed centre, which are set out in the Wiltshire Core Strategy 2015, with the closest centre being Westbury town centre, situated approximately 2.6km to the south. The site is, therefore, in an out of centre location in retail policy terms. The proposal also comprises ‘main town centre uses’ totalling 962 sqm (GIA).
- 1.11 It is, therefore, acknowledged that the application site does not lie within a designated centre and the proposed retail floorspace exceeds the threshold set out in Core Policy 38, thus proportionate retail sequential and impact assessments have been undertaken for this development proposal as part of this Retail Assessment, to demonstrate the proposal is in accordance with Paragraphs 91, 92 and 94 of the NPPF, and Core Policy 38 of the Wiltshire Core Strategy.

Report Structure

- 1.12 The remainder of this Retail Assessment report consists of the following:
- Section 2 – summarises the application site and relevant planning history;
 - Section 3 – outlines the proposed development;
 - Section 4 – sets out the relevant planning policy at national and local levels, specifically relating to the retail sequential and impact tests, and the retail context;
 - Section 5 – outlines the summary of the Health Check for Westbury town centre
 - Section 6 – sets out the retail sequential assessment;
 - Section 7 – sets out the retail impact assessment; and
 - Section 6 – presents a summary and conclusions.

2.0 APPLICATION SITE AND RELEVANT PLANNING HISTORY

Application Site

- 2.1 Hawke Ridge Business Park is located to the north of Westbury and is defined as strategic employment land in the adopted Wiltshire Core Strategy under Core Policies 2 and 32.
- 2.2 The application site lies within the A350 corridor route, near the employment site of West Wilts Trading Estate, which extends to around 67 hectares, and provides approximately 140,000 sq m of employment and industrial floorspace. The site is located 200m east of the West Wilts Trading Estate and 2km south of the A350/ A363 junction near Yarnbrook.
- 2.3 The overall site comprises two parcels of agricultural land totalling 14.58 hectares, and is bound by Hawkeridge Road to the west (B3097), the railway line to the east, and agricultural land to the north and south.
- 2.4 The site is accessed from the B3097 via a four-arm roundabout. The B3097 forms one of the main connecting routes into Westbury to the south. Via this route, the site links to the A350, which is one of the primary north-south vehicular movement routes between Chippenham and the M4 Junction 17 in the north, and the A36 in the south. A public footpath (HEYW6) runs to the north east, and the nearest bus stops are within 400m of the site on the B3097.
- 2.5 The site is bisected by Mill Lane with the overall proposed development being split across two areas either side of the road. Located on Mill Lane between these two development areas is the Grade II Listed Hawkeridge Farmhouse, its associated residential curtilage and ancillary outbuildings, Hawkeridge Barn, and a group of existing employment buildings.
- 2.6 The two parcels of land that form the overall application site are mostly enclosed by vegetation, physically and visually containing the site with defensible boundaries. Part of the existing perimeter vegetation is 'advanced planting' associated with the partial implementation of outline planning permission ref.15/04092/VAR – see planning history below.
- 2.7 The site is not located within a designated centre, with the closest centre being Westbury town centre, situated approximately 2.6km to the south. The site is, therefore, in an out of centre location in retail policy terms.
- 2.8 Notwithstanding, the site is in an accessible, well-connected and sustainable location – Hawkeridge Road (B3097) is situated to the west with dedicated pedestrian footways in both directions to the local bus provision, and Westbury train station is approximately 2km to the

south of the site. These provide various options for travel to the surrounding area (including Westbury town centre), which include attractive sustainable travel modes.

Relevant Planning History

- 2.9 Hawke Ridge Business Park is allocated in the Wiltshire Council Core Strategy (2015) for a mix of B Class employment uses under Core Policies 2 and 34. The lawful use of the site (as existing), however, is agricultural land.
- 2.10 The recorded planning history on the Council's public access system for Hawke Ridge Business Park includes the following applications:

Reference	Description	Decision
14/03118/OUT NB. Superseded	Formation of new business park (Class B1, B2 and B8) access and associated works	Granted 26/09/2014
14/03182/FUL NB. Implemented	Erection of pumping station	Granted 26/09/2014
14/07418/ADV	Sale/letting board for new Hawke Ridge Business Park recently consented under W/03118/OUT	Approved 29/04/2014
14/10780/VAR NB. Superseded	Variation of condition 3 of planning permission 14/03118/OUT to enable the development to be implemented on a phased basis	Granted 22/12/2014
15/01093/FUL NB. Implemented	Formation of new vehicular turning head and associated works– discharge of condition 2 – maintenance plan	Granted 04/01/2016
15/04092/VAR NB. Implemented	Variation of condition 10 of planning permission 14/10780/VAR relating to archaeological works	Granted 30/07/2015
16/06637/ADV NB. Implemented	2 x internally illuminated entrance signage to Hawke Ridge Business Park, Westbury	Approved 08/08/2016
16/06752/REM NB. Extant	Application for approval of reserved matters relating to appearance, landscaping, layout and scale (15/04092/VAR Erection of 4 No. Warehouse Units -Use Class B8- and associated works)	Approved 10/11/2016
16/12236/FUL NB. Lapsed	Erection of 1 drive through retail unit (Class A5/A3); 3 retail units (Class A5); and 1 convenience store (Class A1) and associated works	Granted 21/04/2017

17/01201/REM NB. Extant	Reserved Matters application relating to appearance, landscaping, layout, and scale: (15/04092/VAR): Erection of 20 No. commercial units (numbers 1-12 and 14-21) (Class B1, B2 and B8) and associated works	Approved 20/07/2017
PL/2021/09252 NB. Withdrawn	Development of a new industrial warehouse (Use Class B8) with ancillary office and associated parking, van storage, van staging areas and ancillary infrastructure	Withdrawn 31/03/2023
PL/2026/02393	EIA screen opinion request in respect of current mixed-use proposal	EIA Development 01/06/2026

Table 1. Planning History

- 2.11 The four-arm roundabout and associated landscaping works were implemented pursuant to a variation to the original outline planning permission (ref: 15/04092/VAR). The drainage infrastructure and associated pumping station were implemented pursuant to planning permission ref. 14/03182/FUL.
- 2.12 By virtue of the expiry of the reserved matters time limit condition, however, it is no longer procedurally possible to submit any further reserved matters applications pursuant to the extant outline planning permission (ref. 15/04092/VAR).
- 2.13 Various reserved matters, and a full application for roadside uses were secured speculatively to support the marketing of the site. The full application for the roadside uses was granted planning permission in April 2017 for a very similar development to that now being proposed. Although this has lapsed, we are not aware of any change in circumstance that should alter the outcome.
- 2.14 Two of the reserved matters approvals for employment units remain extant (refs. 17/01201/REM and 16/06752/REM). The consideration of application ref. PL/2021/09252 for the northern plot protracted and Amazon withdraw their application resulting in a significant loss of inward investment.
- 2.15 On the 1st June 2026, the Council confirmed that the proposed development is EIA Development (ref. PL/2026/02393), therefore, requiring an Environmental Statement. In its screening, the Council cited potential significant effects in relation to: (i) ecology impacts upon the Bath and Bradford on Avon SAC for Bats and the Picket and Clanger Woods SSSI/Ancient Woodland; and (ii) traffic generation and associated impacts upon the Westbury Air Quality Management Area (AQMA). In the interest of expediency, the applicant team has

decided, on a without prejudice basis, to submit a full planning application with an Environmental Statement.

3.0 PROPOSED DEVELOPMENT

3.1 This planning application seeks full planning permission for the following development:

Erection of: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works.

3.2 The commercial element of the development proposed (excluding the proposed care home) includes the following:

- Retail convenience store (Class E) – 324 sqm (GIA) / 345 sqm (GEA);
- Flexible retail unit: Unit 1 (Class E) – 108 sqm (GIA) / 120 sqm (GEA);
- Flexible retail unit: Unit 2 (Class E) – 144 sqm (GIA) / 153 sqm (GEA);
- Flexible retail unit: Unit 3 (Class E) – 144 sqm (GIA) / 153 sqm (GEA);
- A roadside drive thru unit (sui generis) – 242 sqm (GIA) / 275 sqm (GEA);
- The access road(s) to service the proposed units;
- Creation of a car park to serve the retail units and drive thru unit with 44 parking spaces, including 6 accessible parking bays; and
- Landscaping and other associated works.

3.3 A site layout plan (ref. 2884 - P.101_B) accompanies this full planning application and demonstrates how the site would be developed. An extract of the layout plan for the commercial element of the proposal is outlined in Figure 1 below.



Figure 1. Extract of site layout plan

- 3.4 This full planning application proposes two buildings that will provide a total of five units, with a mix of Class E uses in one building and a sui generis use in the other, where the operators are not known.
- 3.5 The proposed development will result in a total of 720 sqm (GIA) / 773 sq m (GEA) of Class E floorspace spread across the proposed convenience store and three smaller retail units, and a total of 242 sqm (GIA) / 275 sqm (GEA) of sui generis floorspace within a roadside drive thru unit.
- 3.6 In addition, the commercial element (excluding the proposed care home) includes a total of 44 car parking spaces, with associated internal access road and landscaping, and access will utilise an extension to the existing access arrangements at the site.
- 3.7 The provision of a local convenience store, additional flexible retail units, and a roadside drive thru unit will help meet the needs of the existing and future local residential and business communities (including West Wilts Trading Estate), and future occupiers of the development.
- 3.8 It should be noted that the Business Register and Employment Survey data lists 4,890 employees across West Wilts Trading Estate, Northacres and Brook Lane employment areas in 2024 (Source: Office for National Statistics via NOMIS). This is a significant number of people with limited facilities currently – the proposed development will improve the offer available to these businesses and associated employees, clients and customers, and reduce the need to travel further afield, retaining expenditure in the local area.
- 3.9 It is also demonstrated in this report that this element of the proposed development is in accordance with the sequential approach to development contained within Core Policy 38 of the Wiltshire Core Strategy (2015) and the relevant paragraphs of the NPPF, and the impact assessment demonstrates that the proposal will not harm the vitality or viability of Westbury town centre.

4.0 RELEVANT PLANNING POLICY AND THE RETAIL CONTEXT

National Planning Policy Framework

- 4.1 The revised National Planning Policy Framework (NPPF) was published in December 2024 (with amendments made in February 2025) and forms the planning framework for England, and sets out the Government's planning policies and how these are expected to be applied.
- 4.2 National policy applying to proposals involving retail development is set out in Paragraphs 90 – 95 of the NPPF.

The Sequential Test

- 4.3 Paragraph 91 of the NPPF states that *“Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan ...”*
- 4.4 Main town centre uses, which include a convenience store, retail units and a roadside drive thru are required to be located in town centres, then in edge of centre locations, and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 4.5 The NPPF advises at Paragraph 92 that in considering edge and out of centre sites, preference should be given to sites that are accessible and well connected to the town centre, and 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.
- 4.6 Town centres are defined in the NPPF as an area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres, but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the Development Plan, existing out of centre developments, comprising or including main town centre uses, do not constitute town centres.

Retail Impact

- 4.7 Paragraph 94 of the NPPF states that *“when assessing applications for retail and leisure development 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 locally set threshold, the default threshold is 2,500 sq m of gross floorspace). This should include 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).”*

Development Plan

- 4.8 The current adopted Development Plan for Wiltshire Council includes the Wiltshire Core Strategy.

Core Strategy

- 4.9 The Wiltshire Council Core Strategy was adopted in 2015. The relevant policy from the Core Strategy associated with retail and leisure development is Core Policy 38. It states that:

“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.”

Retail Context

- 4.10 The principal policies for assessing town centre and retail uses are set out in Paragraphs 90 – 95 of the NPPF. It is stated that retail centres are the preferred location for new development. The NPPF also confirms that the references to ‘town centres’ relate to all designated centres (e.g. town centres, district centres and local centres).

- 4.11 Where proposals for ‘main town centre uses’ (including retail and drive thru facilities) are not located within a designated centre, the NPPF requires proposals to demonstrate compliance with the retail sequential and impact tests. Only where a proposal fails to satisfy the sequential test or is likely to have a significant adverse impact should permission be refused.
- 4.12 This is an important consideration. Retail facilities are an important component of everyday life and, while designated centres may be a preference, this may not be possible due to a number of factors. Where the retail sequential and impact tests are satisfied, the NPPF accepts the principle of new retail development in non-town centre locations.

Other Material Considerations

- 4.13 Other planning policy documents that are relevant to the consideration of this proposal, and the retail sequential and impact tests are as follows:
- Planning Practice Guidance
 - Paragraph: 006 Reference ID:2b-006-20190722
 - Paragraph: 011 Reference ID: 2b-011-20190722
 - Paragraph: 013 Reference ID: 2b-013-20190722
 - Paragraph: 015 Reference ID: 2b-015-20190722
 - Paragraph: 017 Reference ID: 2b-017-20190722
 - Paragraph: 018 Reference ID: 2b-018-20190722

5.0 SUMMARY HEALTH CHECK – WESTBURY TOWN CENTRE

- 5.1 To assist in determining the likely economic impact of the commercial element of the proposed development (excluding the proposed care home), this section of the report establishes the baseline health of relevant centres.
- 5.2 In assessing the impact of the proposal on existing and proposed centres, it is necessary to establish the catchment of this element of the proposed development. The proposed core catchment is considered to principally consist of Westbury.
- 5.3 A summary of the findings of the health check of Westbury outlined in the Wiltshire Retail and Town Centres Study 2020 is, therefore, set out below, which has been updated where necessary following our site visit in May 2026.

Westbury

Overview

- 5.4 Westbury is a market town situated to the west of Wiltshire, located between Trowbridge and Warminster – approximately 8.5km south of Trowbridge and 6.5km north of Warminster. The A350, A3098 and B3098 run through the town, providing good connectivity to the surrounding areas. The majority of traffic is routed around the town centre, however, creating a largely ‘pedestrianised’ shopping environment.
- 5.5 Westbury includes an historic marketplace, beyond which is the 14th Century churchyard of All Saints’ Church, whereas High Street is a product of 1970’s ‘precinct’ architecture. Consequently, the overall quality of the environment in Westbury is varied, with good quality historic buildings to the north and south, and more modest modern buildings around High Street. In addition, the area appears safe with low occurrences of crime.
- 5.6 Westbury is a relatively compact centre, which is focused to the east of Haynes Road, along Edward Street and High Street, and around Market Place.
- 5.7 There are also other facilities in Wiltshire that are outside the town centre, but important to how Westbury functions. These include the Lidl discount foodstore at Kingfisher Drive, and West Wilts Trading Estate, which is located approximately 200m west of the application site.
- 5.8 The survey carried out by Grass Roots Planning in May 2026 concluded that Westbury is generally a busy, attractive, well maintained and accessible town centre.

Diversity of Uses / Retailer Representation

- 5.9 The majority of retailing within Westbury town centre is focussed on High Street, Maristow Street and at the Market Place. Secondary streets including the east of Haynes Road and Edward Street also provide a level of retail uses.
- 5.10 The town centre comprises a mix of service, comparison and convenience units, as well as sui generis units, and office and residential properties. The Council's Retail and Town Centres Study 2020 outlined that the main type of use is service uses.
- 5.11 The survey carried by Grass Roots Planning in May 2026 calculated that at present, the town centre service provision is still high, totalling approximately 58% of the town centre offer. The dominant elements within the town's service provision are cafes, restaurants, takeaways, public houses, barbers and hairdressers, and health and beauty salons. There is also a strong presence of financial and professional services, including estate agents.
- 5.12 The comparison retail sector is modest, comprising independent retailers, including stationery and card shops, DIY stores, florist, and other local businesses. There are also a small number of national retailers, which include charity shops and a Boots chemist.
- 5.13 There are a limited number of convenience stores within Westbury town Centre. The existing convenience provision is dominated by national retailers, which include a Londis convenience store, a Morrisons supermarket, and an Aldi discount foodstore. This is also an independent bakery. In addition, there is an out of town Lidl discount foodstore located to the north of the town on Kingfisher Drive and other smaller convenience stores throughout the town, which add to the convenience goods offer in Westbury.

Vacancies

- 5.14 Westbury has historically experienced a high level of vacancies, with 18 in 2008 referenced in previous Council studies. That number appears to have stabilised at a reduced level, with the Grass Roots Planning's recent survey identifying 10 vacant units, representing approximately 11% of the total town centre offering, which is below the national average. Examples of the current vacant units within the town centre are shown in Figure 2 below.



Haynes Road



High Street



Maristow Street



Warminster Road



Edward Street



Maristow Street

Figure 2. Examples of Vacant Units within Westbury Town Centre

- 5.15 It is also important to note that there will rarely be a circumstance where no vacancies are found within any given centre at a point in time, as shop leases expire and/or business relocate. Likewise, a range and choice of vacancies can assist in facilitating the movement of businesses within and to a town centre.
- 5.16 Furthermore, there is no real cluster of vacant units within Westbury town centre, they are sparsely spread throughout the centre and many are currently undergoing renovation, which suggests there are no localised issues within the town preventing businesses from being successful, and some are likely to be repurposed and reopen.

Pedestrian Flows

- 5.17 The main shopping areas of Westbury town centre comprise High Street, Maristow Street and at the Market Place, as well as Edward Street. While the town centre is not pedestrianised, the majority of traffic is routed around the town, and High Street is characterised by shared surfaces for all users, including pedestrians. It is, therefore, relatively easy for pedestrians to navigate through the centre, and reasonable footfall was experienced during the Grass Roots Planning survey.

Accessibility

- 5.18 The town centre is served by a number of car parks that are situated throughout the retail centre, and provide necessary parking provision for visitors to the town centre.

- 5.19 The town is also served well by public transport, with bus stops throughout the centre on High Street, Edward Street and Haynes Road. There are essentially four bus services within Westbury, as identified in Table 2 below. The number D1 bus (as well as the 87 and X47) stops in close proximity to the application site, providing a bus into Westbury approximately every 60 minutes throughout the day.

Number	Route	Frequency
45	Westbury Town Service via Newtown	Monday to Saturday (PM) approx. every 60 minutes
45A	Westbury Town Service via Chestnut Grove	Monday to Saturday (AM) approx. every 60 minutes
45B	Westbury Town Service via Newtown	Monday to Saturday (AM) approx. every 60 minutes
47	Frome – Dilton Marsh – Westbury	Monday to Saturday approx. every 180 minutes from Frome and every 60 minutes from Dilton Marsh
X47	Frome – Dilton Marsh – Westbury – Trowbridge	Monday to Friday once a day – early morning from Frome and late afternoon from Trowbridge
87/87A	Trowbridge – Westbury – Devizes	Monday to Saturday approx. every 90 minutes early morning, then every 120 minutes with a gap to late afternoon, then every 60 minutes
D1	Bath – Bradford on Avon – Trowbridge – Westbury – Warminster	Monday to Sunday approx. every 60 minutes

Table 2. Westbury Bus Services

- 5.20 Westbury also has a train station, which is located approximately 1.3km from the town centre and 2km from the application site. Westbury has a direct service line to London Paddington and London Waterloo. In addition, there are other services including to Trowbridge, Bath, Portsmouth, Yeovil, Bristol, and Cardiff.

Conclusion

- 5.21 This assessment and the survey carried out by Grass Roots Planning concludes that Westbury town centre is vital and viable, performing well, and fulfilling its role within the retail hierarchy as a Market Town.

6.0 SEQUENTIAL ASSESSMENT

- 6.1 Paragraph 91 of the NPPF states that local planning authorities should require applications for main town centre uses to be located in town centres, then edge of centre, and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 6.2 Furthermore, Core Policy 38 of the Wiltshire Core Strategy states that *“All proposals for retail or leisure uses on sites not within a town centre in excess of 200 sqm gross floorspace ... must be accompanied by an impact assessment ... 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.”*
- 6.3 Paragraph 92 of the NPPF states that when considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applications and local planning authorities should also 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.
- 6.4 It is acknowledged that the application proposal includes ‘main town centre uses’ and the application site does not lie within a designated centre. The site is, therefore, considered out of centre in retail planning policy terms. Notwithstanding, the application site is in an accessible, well-connected and sustainable location.
- 6.5 A proportionate sequential assessment has, therefore, been undertaken for this development proposal to satisfy Paragraphs 91 and 92 of the NPPF, and Core Policy 38 of the Wiltshire Core Strategy, which is set out below.
- 6.6 This assessment is based on information regarding the potential availability and suitability of alternative sites. The assessment has been informed by research undertaken by Grass Roots Planning to assess possible alternative sites within Westbury town centre, and edge of centre and other out of centre locations, including site visits undertaken in May 2026.
- 6.7 The sites that we have considered worthy of further analysis are set out in the ‘Relevant Sequential Sites’ section below, and are all within town centre, edge of centre or other out of centre locations.

Sequential Assessment – Parameters

- 6.8 Paragraph 91 of the NPPF and Planning Policy Guidance (PPG) confirm that, in reviewing alternative sites, regard should be given to the suitability and availability of those sites. These are defined as follows:
- Availability – whether sites are available now or likely to become available for development within a reasonable period (determined on the merits of the particular case).
 - Suitability – with due regard to the requirement to demonstrate flexibility, whether sites are suitable to accommodate the proposal.
- 6.9 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’ – viability is defined as whether there is a reasonable prospect that development will occur on the site at a particular point in time.
- 6.10 PPG Paragraph: 011 Reference ID: 2b-011-20190722 advises that while it is for the applicant to demonstrate compliance with the sequential test, wherever possible, the local planning authority is expected to support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the sequential test will need to be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity.
- 6.11 Furthermore, Paragraph: 013 Reference ID: 2b-013-20190722 of the PPG states that *“as promoting new development on town centre locations can be more expensive and complicated than building elsewhere, local planning authorities need to be realistic and flexible in applying the test.”*
- 6.12 In considering the sites, we have also 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 Dundee¹, which was further clarified by the Secretary of State decision at Rushden Lakes².

¹ Tesco Stores Limited v Dundee City Council [2012] UKSC 13

² Rushden Lakes Retail Park (ref: 2190175, 11 June 2014)

- 6.13 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”*, and 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”*.
- 6.14 The decision confirmed 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.
- 6.15 More guidance has been provided about the application of the sequential test through the Lionbrook case³, and a High Court judgement⁴ relating to an out of centre food retail proposal in Mansfield.
- 6.16 These decisions provide further clarity with regard to the assessment of potential sequentially preferable sites in terms of their suitability and availability, and the need for the applicant to demonstrate flexibility. 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”*.
 - This is to include the requirement for flexibility and *“excludes, generally, the identity and personal or corporate attitudes of an individual retailer”*.
 - In terms of a site’s availability, this relates to the availability of the type of retail use for which permission is sought and not to its availability to a particular retailer.
- 6.17 In summary, alternative sites have to be suitable for the broad type of development proposed, but are subject to a requirement for flexibility from the developer. Furthermore, the requirement of individual operators is not generally relevant to the application of the sequential test, and the time period sites should be available is a matter of planning judgement, which will vary from case to case, and should be considered in relation to specific sites.

³ CBRE Lionbrook (General Partners) Limited v Rugby Borough Council v Hammerson (Rugby) Limited [2014] EWHC 646 (Admin)

⁴ Aldergate Properties Ltd v Mansfield District Council and Regal Sherwood Oaks Ltd [2016] EWHC 1670 (Admin)

- 6.18 The above parameters are considered to provide a robust and policy-compliant basis for the proportionate sequential assessment set out below.

Sequential Assessment – Methodology and Flexibility

- 6.19 A proportionate sequential assessment has been undertaken for this development proposal. In undertaking the assessment, we have considered the potential for alternative sites within the catchment area of the proposed development to accommodate the broad type of development proposed.
- 6.20 For the purposes of this Sequential Assessment, the development proposed is assumed to comprise 1 No. retail convenience store (Class E) with a GEA of 345 sqm, 3 No. flexible retail units (Class E) with GEAs of 120 sqm, 153 sqm and 153 sqm respectively, and a roadside drive thru unit (sui generis) with a GEA of 275 sqm.
- 6.21 The proposed development will, therefore, result in a total of 1,048 sqm (GEA) of Class E and sui generis floorspace spread across the proposed convenience store, three smaller retail units, and the drive thru unit. In addition, the development will be accompanied by a total of 44 car parking spaces, with associated loading and service areas, internal access road and landscaping, and other associated elements.
- 6.22 In considering potential alternative sites, however, we have applied what we consider to be a reasonable level of flexibility with regard to the broad type of development proposed by reference to its format, and approximate size, type and range of goods – the sequential assessment considers sites capable of accommodating a development within 10% of the proposed floorspace (943 sq m – 1,153 sq m) and within 15% of the proposed parking provision (37 spaces – 51 spaces), alongside the other required elements.
- 6.23 The availability of appropriate nearby customer car parking is a crucial part of the commercial success of the proposed units. Development sites with a lower level of floorspace or a reduced level of car parking often represent compromised trading locations, which retailers would generally resist.
- 6.24 It is also considered that for the proposed development to deliver the associated benefits for the existing and new residents, and local employees (e.g. at West Wilts Trading Estate), the entire proposal should be implemented on the same site. These benefits include an improved retail offer and accessible facilities, and a reduction in the need to travel and travel distances.

- 6.25 We have adopted the flexibility parameters outlined above as the thresholds that potential sites must be capable of accommodating to ensure robustness and thorough assessment – any site below the minimum threshold would not, in our opinion, be suitable for the broad type of development proposed and should, therefore, be discounted.
- 6.26 Notwithstanding, when undertaking the proportionate sequential assessment, we have also scenario tested, whereby alternative sites have also been considered for the two separate buildings proposed as part of the development (696 sqm – 850 sqm for the retail building and 248 sqm – 303 sqm for the drive thru building), and the assessment has been carried out in accordance with best practice as set out in the PPG and as such, represents a robust position.
- 6.27 This is a very similar methodology to the Retail Assessment prepared in support of the previous 2016 retail planning application on the site, which was agreed, and we are not aware of any changes in the context that should alter the way this assessment is carried out.

Sequential Assessment – Relevant Potential Sequentially Preferable Sites

- 6.28 The primary catchment area for the proportionate sequential assessment covers the general area that the broad type of development proposed is intended to serve, which extends to the built up area of Westbury and its immediate surroundings. This is considered appropriate given the spread of existing retail facilities and the existing population, and the proposed new residents to the area both on the wider application site and in the surrounding area.
- 6.29 We carried out an ‘on the ground’ survey / site visit of Westbury town centre to determine whether there are any potential sequential sites within, at the edge or outside (and better connected) to the centre. Our site visits identified the following sites within the catchment area that were worthy of detailed consideration:
- Vacant units along the Westbury Primary Frontage
 - Vacant units within the wider Westbury Commercial Area Boundary

- 6.30 Grass Roots Planning has undertaken an extensive review of these sites, and a commentary on these sites is provided below. This outlines the specific details of the sites and sets out why they do not represent suitable or available sequential alternatives for the proposal.

Sequential Assessment – Assessment of Alternative Sites

- 6.31 In applying the methodology outlined above, we have not identified any sites that are suitable or available for the broad type of development proposed. A summary of the analysis is outlined below.

Vacant Units within Westbury Primary Retail Frontage

- 6.32 We only identified one vacant unit located along the Westbury Primary Retail Frontage, as identified on the adopted Proposals Map – 15 High Street, Westbury, which is shown in Figure 3 below.



Figure 3. 15 High Street, Westbury

- 6.33 This unit has a number of constraints, which include the small scale of the unit (approximately 100 sqm), modest accessibility for customers and servicing, limited parking and residential properties above.
- 6.34 It is considered that although the unit may be available, its very small size would not accommodate the proposed development or any of the buildings on the application site on an individual basis – it is far too small to accommodate the broad type of development proposed, even when adopting the flexible approach set out above.
- 6.35 For the purposes of this assessment, the proposed roadside drive thru unit requires a minimum footprint of 248 sqm. The unit also incorporates a drive thru facility and adjacent car parking. Reducing the size of the proposed unit and removing the drive thru facility would be a significant compromise and an unreasonable proposition. It would also render the proposal unviable.
- 6.36 The proposed retail building is significantly larger than the vacant unit, requiring a minimum of 696 sqm for the purposes of this assessment. This vacant unit is, therefore, far too small to accommodate the proposed retail building, even when considering a reasonable alternative to the proposals. The level of compromise required would be unreasonable and render the proposed scheme unviable.
- 6.37 Notwithstanding, the constrained nature of the vacant unit means that servicing for the types of uses proposed would be difficult, as there is limited space to the front and rear of the premises, and no dedicated space. There is limited parking adjacent to the unit, which is

shared with other businesses and only available for a short period of time. This would make the operation of the proposed uses challenging, and they would not be attractive to customers.

- 6.38 The drive-thru facility also has operations that are not easily compatible with residential properties above, and are likely to cause amenity issues.
- 6.39 There are also highways issues associated with the development that are likely to impact on the viability of the proposal. The proposed development will provide an improved offer to pass by traffic. This would not be available within the Primary Shopping Frontage, which is very contained – many of the routes in Westbury take traffic around the centre rather than through the town centre.
- 6.40 Locating any part of the proposed development within the Primary Shopping Frontage is unlikely to deliver the same level of benefits to the local area compared with the application site. The proposal will provide an improved offer and much needed facilities for the existing businesses at West Wilts Trading Estates, the existing and future residents of the local area, and pass by traffic along Hawkridge Road.
- 6.41 The proposed development will also reduce the need to travel further afield for the proposed uses by existing employees, visitors and residents, and future residents of the area, as well as will minimise the travel distances and time to such uses.
- 6.42 It has been demonstrated that although the vacant unit along the Westbury Primary Shopping Frontage may be available, it is not suitable for the broad type of development proposed or even any of the proposed buildings on an individual basis. This unit is, therefore, not considered sequentially preferable.

Vacant Units within Westbury Commercial Area Boundary

- 6.43 There are only a limited number of vacant units within the Westbury Commercial Area Boundary, as identified on the adopted Proposals Map. These are outlined in Figure 4 below.



Haynes Road



Warminster Road



Edward Street



Maristow Street



Maristow Street



Maristow Street



Market Place

Figure 4. Vacant Units in the Commercial Area Boundary

- 6.44 The vacant units are dispersed throughout the Commercial Area Boundary, and none are sufficiently clustered to create a large enough unit collectively. In addition, each have a number of constraints associated with them. Many of the units are small, within Listed Buildings and within a terrace of properties, adjacent to or below residential properties, limited servicing and parking arrangements, and poor accessibility.
- 6.45 It is considered that all of the vacant units are far too small to accommodate the broad type of development proposed, or even the two buildings proposed on an individual basis (retail building and drive thru building).
- 6.46 The proposed roadside drive thru unit requires a minimum footprint of 248 sqm for the purposes of this assessment. The unit also incorporates a drive thru facility and adjacent car parking. Reducing the size of the proposed unit and removing the drive thru facility to try to accommodate the business within a vacant unit would represent a substantial shift from this business model, be a significant compromise, and an unreasonable proposition. It is also likely to render the operation unviable.

- 6.47 The proposed retail building is significantly larger than any of the vacant units within the Commercial Boundary Area, requiring a minimum of 696 sqm for the purposes of this assessment. Even when considering a reasonable alternative to the proposals, the vacant units are far too small to accommodate the proposed retail building. The level of comprise required would be unreasonable and render the proposed scheme unviable.
- 6.48 Furthermore, none of the vacant units have the level of servicing and parking provision required, and none will be able to deliver the minimum offer for the uses to be viable due to the issues associated with residential amenity. The nature of the local road network around the town centre is also likely to impact the viability of the proposal, as there would not be the level of pass by traffic and demand available.
- 6.49 There are also a limited number of car parks within the Commercial Area Boundary, which include the main car parks off High Street and Warminster Road, which appear to be Council owned, and operate on a pay and display basis. These provide a valuable facility for short and long stay parking, which is an important facility that would be compromised through the increased demand by the proposals.
- 6.50 Locating the proposed development within the Commercial Area Boundary is unlikely to deliver the same level of benefits to the local area compared with the application site. These benefits include the reduction in the need to travel and travel distances/time, and an improved offer for the existing businesses in the immediate area, existing and new local residents, as well as pass by traffic along Hawkridge Road.
- 6.51 It has been demonstrated that although the vacant units within the Commercial Area Boundary may be available, they are not suitable for the broad type of development proposed, or even any of the proposed buildings (retail and drive thru buildings) individually. These units are, therefore, not considered sequentially preferable.
- 6.52 Other sites in edge of centre and out of centre locations were also considered through our research and site visits, but none were identified that are available or suitable to accommodate the broad type of development proposed in a reasonable timeframe.
- 6.53 Overall, it has been demonstrated there are no sequentially preferable sites within, on the edge, and outside designated centres that are suitable or available (or expected to become available within a reasonable period) for the broad type of development proposed at the application site.

Sequential Assessment – Conclusion

- 6.54 Our research has identified potential alternative sites that are worthy of detailed consideration. We have undertaken an extensive review of these sites in line with the requirements of the NPPF, PPG and case law, and the above analysis sets out why they do not represent suitable or available sequential alternatives for the proposals.
- 6.55 For the avoidance of doubt, it is not considered necessary to analyse any further sites, as such sites are no more sequentially preferable than the application site.
- 6.56 We consider there are no alternative sites within town, edge or out of centre locations that should be considered sequentially preferable to the application site. The proposed development site is, therefore, considered to represent the only site suitable and available for the broad type of development proposed. We, therefore, conclude that the sequential test is satisfied.

7.0 RETAIL IMPACT ASSESSMENT

7.1 Paragraph 94 of the NPPF states that when assessing applications for retail and leisure development outside of 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 locally set threshold, the default threshold is 2,500 sqm of gross floorspace). The impact assessment should include an assessment of the following:

- 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).

7.2 Furthermore, Core Policy 38 of the Wiltshire Core Strategy states that *“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.”*

7.3 It is acknowledged that the application proposal includes ‘retail uses’, the application site does not lie within a designated centre, and the proposals are in excess of the local threshold for impact assessments set by Core Policy 38 of the Wiltshire Core Strategy.

7.4 A proportionate retail impact assessment has, therefore, been undertaken for this development proposal to satisfy Paragraph 94 of the NPPF and Core Policy 38 of the Wiltshire Core Strategy, which is set out below, and the impact analysis is presented as a series of tables included in **Appendix 1**.

Assessment

7.5 As set out previously, the proposed development comprises two distinct buildings providing a mix of uses totalling 962 sqm (GIA). A breakdown of the proposal is provided below.

- Building 1 – Class E retail convenience store (324 sqm (GIA)), and three Class E flexible retail units (totalling 396 sqm (GIA)).
 - Building 2 – A sui generis roadside drive thru unit (242 sqm (GIA)).
- 7.6 While the use of the convenience store is known, the exact use within Class E of the remaining space within Building 1 is subject to occupier interest. The quantitative assessment, therefore, examines two scenarios.
- 7.7 Scenario 1 assesses the impact of only the convenience store (324 sqm (GIA)) on the basis that the remaining floorspace of Building 1 will not come forward as convenience or comparison goods floorspace. This forms the most likely development outcome.
- 7.8 Scenario 2 examines the impact of the total floorspace of Building 1 (720 sqm GIA)) for a mix of convenience and comparison goods, which represents a robust position and a ‘worst case’ scenario for the scheme.
- 7.9 This is the same agreed approach as adopted in the assessment that supported the previous 2016 application for a similar development and we are not aware of any changes that should alter the approach.

Supporting Data

Wiltshire Retail and Town Centres Study 2020

- 7.10 This is the most recent local planning authority commissioned retail study relating to the area. This was prepared by Avison Young for the whole of the Wiltshire Council authority area, and is substantially based on a household interview survey undertaken in February 2020.
- 7.11 Whilst useful in a general sense, there is an insufficient breakdown of operators/units in Westbury – a disproportionate level of analysis would be required to provide an assessment of impact based on this or new data obtained, particularly given the limited floorspace proposed on what is a relatively small catchment area.
- 7.12 It is, therefore, considered appropriate to adopt a ‘benchmarking’ or average store turnover approach, in order to estimate the current turnover of existing floorspace. This approach is considered to provide an appropriate, robust and proportionate basis for quantifying impacts,

and is the same approach to that adopted in the retail assessment that supported the previous 2016 planning application for a very similar development, which was agreed, and planning permission was granted.

- 7.13 The assessment has been informed by floorspace figures derived from the Wiltshire Retail and Town Centre Study 2020 were possible, otherwise calculations by Grass Roots Planning, and sales densities have also been derived from the Wiltshire Retail and Town Centre Study 2020 for consistency, as well as through assumptions made by Grass Roots Planning.

Commitments

- 7.14 We are not aware of any relevant retail commitments that should be taken into account as part of this impact assessment.

Methodology

- 7.15 We have adopted a conventional step-by-step, trade draw methodology to assess impact based on available published data (brought up to date where necessary). This is based on an estimate of store turnover (and supporting catchment area expenditure) in the 'design' year, and a series of judgements relating to the proportion of turnover estimated to be derived from existing stores.
- 7.16 These judgements reflect factors such as scale, retail offer, location and distance, and extent of 'trading overlap', underpinned by the principle of 'like competing with like' – nearby facilities with a similar catchment and trading in the same market sector will experience the greatest impacts applying these assumptions. Conversely, distant facilities of a differing scale and nature will be far less likely to experience diversion of trade.
- 7.17 This methodology is widely applied and accepted in retail assessment work, and reflects that advocated in the PPG. The approach is considered to be logical, transparent, proportionate, and robust.
- 7.18 There are six main steps underpinning the approach set out above:
- Step 1: define a catchment
 - Step 2: identify base and design years for the assessment

- Step 3: estimate the turnover of existing centres and retail destinations
- Step 4: estimate the turnover of the proposal and any commitments
- Step 5: apportion the turnover of the proposal (and any commitments) to stores/centres using a trade diversion methodology, based on an understanding of proximity and the extent to which the proposal will compete with the facilities
- Step 6: quantify trade diversion (impact) and assess the significance of the estimated impacts, both solus (individual) and cumulatively (with any commitments), on established centres.

7.19 Impact is expressed as a percentage of existing centre turnover diverted to the proposal in the impact year.

Assumptions and Assessment Parameters

7.20 The main supporting assumptions and assessment parameters are as follows:

- **Base and Design Years:** base year of 2026 (the current year) and design year of 2031 (defined by the PPG as five years from when the application is made).
- **Price Year:** constant 2018 prices (consistent with the Wiltshire Retail and Town Centre Study 2020).
- **Catchment Area:** based on the characteristics of the proposal (i.e. a local convenience store and retail provision, and a roadside drive thru), and the nature and distribution of competing facilities, the catchment area consists of Westbury and the surrounding area. This represents an approximate five-minute drive time from the proposal.
- **Turnover of Existing Stores:** calculated by multiplying the net convenience goods and comparison floorspace from existing stores in the catchment area by the average sales density adopted for each retailer.
- **Turnover of Proposal:** calculated from the net floorspace and the sales density of £8,940 per sqm for convenience goods and £2,790 per sqm for comparison goods, both at 2018 prices. These represent estimates of sales densities for small convenience stores with localised catchments as identified in the Wiltshire Retail and Town Centre Study 2020, and assumptions by Grass Roots Planning.

Quantitative Impact Assessment

- 7.21 The analysis is set out in a series of tables in **Appendix 1**, and the assessment shows the following:

Turnover of the Proposal – Scenario 1 (Appendix 1, Table 2)

- 7.22 The estimated convenience and comparison goods turnovers of the proposal in Scenario 1 are set out in Table 2. As explained above, this scenario examines the impact of the development of a local convenience store (292 sqm net) – this is the scheme most likely to be developed. Convenience and comparison goods turnovers are shown for both the base (2026) and design years (2031).
- 7.23 The store operator is currently not known. We have, therefore, applied our judgement to the likely sales densities of a small convenience store at the application site, which will have a highly localised catchment. This is based on national retailers for robustness, but in reality it could be a regional or local operator, thus a lower sales density, which would lead to lower impact levels. This, therefore, represents a ‘worst case’ scenario.
- 7.24 When applying a sales density of £8,940 per sqm to the net convenience floorspace, it generates a convenience turnover of £2.23m in 2026 from the catchment area, increasing to £2.24m in 2031 with an allowance for floorspace efficiency increases. When including comparison goods, the turnover increases by £0.09m, generating a total store turnover in 2031 of 2.33m per annum. By far the significant majority of the estimated turnover of the proposed convenience store (96%) is, therefore, convenience goods sales, clearly demonstrating the ancillary nature of the proposed store’s comparison goods function.

Anticipated Trade Diversion/Impact of the Proposal – Scenario 1 (Appendix 1, Table 3)

- 7.25 Our estimated trade diversion from Westbury town centre and other stores to the proposal is set out in Table 3. This forms the basis for the impact calculation and is based on the methodology outlined above.
- 7.26 The main convenience goods facilities in the town are estimated to experience the greatest trade diversion following the introduction of the proposed convenience store, in particular Morrisons on Edward Street, Lidl on Kingfisher Drive and Aldi on Warminster Road. The

proposal is also likely to draw ‘top-up’ trade from directly competing local stores, notably the Tesco Express on Fore Street and at Leigh Park, and the Premier Stores on The Ham.

- 7.27 The estimated impact of the proposed convenience store on the designated Westbury town centre (defined by the Commercial Boundary Area in this case) is -4.6%. This level of impact is not of an order of significance that would lead to conflict with policy in the NPPF or Wiltshire Core Strategy.

Turnover of the Proposal – Scenario 2 (Appendix 1, Table 4)

- 7.28 The estimated convenience and comparison goods turnovers of the proposal in Scenario 2 are set out in Table 4. As explained above, this scenario examines the impact of the development on the assumption that the whole building (648 sqm net) will be occupied by convenience and comparison goods floorspace – this scheme is less likely to be developed and represents a ‘worst case’ scenario. Convenience and comparison goods turnovers are shown for both the base (2026) and design years (2031).
- 7.29 Again, the operators are not currently known. We have, therefore, applied our judgement to the likely sales densities for a modest amount of convenience and comparison floorspace at the application site, which will have a substantially localised catchment.
- 7.30 When applying a sales density of £8,940 per sqm to the net convenience floorspace, it generates a convenience turnover of £3.65m in 2026 from the catchment area, increasing to £3.67m in 2031 with an allowance for floorspace efficiency increases. When including comparison goods, the turnover increases by £0.55m, generating a total store turnover in 2031 of 4.22m per annum. Due the reapportionment of floorspace across the proposed building in Scenario 2, 87% of the estimated turnover is devoted to convenience goods.

Anticipated Trade Diversion/Impact of the Proposal – Scenario 2 (Appendix 1, Table 5)

- 7.31 Our estimated trade diversion from Westbury town centre and other stores to the proposal is set out in Table 3. This forms the basis for the impact calculation and is based on the methodology outlined above.
- 7.32 Scenario 2 uses the similar trade diversion pattern as Scenario 1, but reflects the rebalance of floorspace and applies the increased turnover as a result of the greater amount of floorspace, derived from Table 4.

- 7.33 The estimated impact of the proposed convenience store on the designated Westbury town centre (defined by the Commercial Boundary Area in this case) is -8.5%. Even in this ‘worst case’ scenario, this level of impact is not at a level that will result in a significant adverse impact, and thus would not lead to conflict with policy in the NPPF or Wiltshire Core Strategy.

Significance of Impact for Existing Centres

- 7.34 Paragraph 94 outlines the impact considerations that planning applications for ‘main town centre uses’ (not in a centre and not in accordance with an up to date Development Plan) should be assessed against – applicants are required to consider two issues only:

- 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).

- 7.35 Paragraph 95 of the NPPF sets out key guidance on the interpretation of the Paragraph 94 ‘impact tests’. An application should only be refused where the proposal is likely to have a ‘significant adverse’ impact on ‘one or more of the considerations in Paragraph 94’. This is a critical consideration – impact alone does not justify refusal – unless impact is both significant and adverse, planning permission should not be resisted [our emphasis].

- 7.36 The significance of the impact and the degree to which it has been assessed to be ‘adverse’ is, therefore, the primary consideration, rather than some trade being diverted from a particular centre. We highlight the following in relation to the ‘tests’ set out in Paragraphs 94 and 95, while drawing on the analysis outlined in **Appendix 1**:

Investment Impacts

- 7.37 The stage that investment proposals have reached is a significant material consideration in assessing whether impacts are adverse and significant. Proposals at an early stage or where detail is limited, and where retailers are unknown have limited weight when applying this aspect of this impact test.

7.38 We are aware of the aspirations for the town centre as set out in the Westbury Neighbourhood Plan (Made 2024) Masterplan and in Annex 1 – Westbury Town Centre Vision, but these have not come to fruition as yet, and we are not aware of any proposals in the pipeline to meet the aspirations.

7.39 The levels of impact identified in our quantitative assessment presented in **Appendix 1** are low. Although the impacts are estimated to be slightly higher in Scenario 2 given the greater floorspace, we do not anticipate that the levels of diversion would deter future investment in Westbury or undermine investor confidence.

Vitality and Viability, including Local Consumer Choice and Trade

7.40 When considering the outputs of our health check of Westbury town centre and impact assessment, and the nature, function and scale of the centre’s retail offer compared with the proposed development, we do not consider that the proposal would undermine the vitality and viability of Westbury town centre, or its future performance. The consequences for the centre are well within acceptable levels, and not of the scale of ‘significance’ that would lead to a conflict with the NPPF – our analysis demonstrates that the level of impact on Westbury town centre in both scenarios is low.

7.41 It is also anticipated that a proportion of customers visiting the new facilities who formally visited stores further away, are likely to visit other facilities in the local area. Therefore, although the proposal will divert some expenditure from the existing centre as set out in our analysis, which is considered to be low and not ‘significantly adverse’ in any event, the actual loss of trade is likely to be less.

7.42 Furthermore, there is an increase in the amount of housing in the north of Westbury through new residential developments, some of which are committed (e.g. up to 145 dwellings at Land at Glenmore Farm and 8 dwellings at Court Farm) and some is proposed (e.g. 165 dwellings at Land Off Storridge Road and 249 dwellings on the wider application site at Hawke Ridge Business Park). This will increase the amount of available expenditure in the area and demand for facilities – the actual impacts on the existing facilities as a result of the proposed development are, therefore, likely to be less than have been estimated in reality, so represent a ‘worst case’ scenario.

- 7.43 It should also be noted that although Westbury town centre already has a number of cafes, restaurants and takeaways that seek to meet the needs of the local residents, the uses proposed at the application site provide a different offer compared with the existing facilities – the proposal will attract visitors and employees from the surrounding area in the main, rather than directly competing with the existing facilities in the town centre.
- 7.44 It is, therefore, considered that the proposal at the application site will not result in ‘significant adverse’ impacts on the existing facilities in the town centre. Moreover, it is likely to attract investment in the area that will benefit the local economy and Westbury town centre.

Qualitative Impacts

- 7.45 The proposed commercial development will have positive impacts and deliver a number of significant benefits to the local area.
- 7.46 There are currently only limited ancillary supporting facilities within West Wilts Trading Estate, which do not provide for the day to day needs of the business and employees, and visitors of the Trading Estate. There is also only a modest number of facilities for residents of the surrounding area, and the pass by traffic along Hawkeridge Road. The local population, therefore, has to travel some distance to acquire their day to day goods, or visit a facility to meet for business meetings or social engagements (e.g. the Budgens/Greggs on Westbury Road to the north).
- 7.47 There is also a committed and planned increase in the amount of housing to the north of Westbury, including on the wider application site at Hawke Ridge Business Park, which will increase the demand for these facilities.
- 7.48 The proposed mix of uses at the application site will provide an improved retail offer and much needed facilities for the existing businesses at West Wilts Trading Estate, existing and new residents in the area, and pass by traffic along Hawkr Ridge Road. This will reduce travel distances and retain expenditure in the local area.
- 7.49 The application site is also on the local bus network with existing bus stops located adjacent to the site, meaning the facilities are accessible by sustainable modes of transport, including active travel from the local area and neighbouring Trading Estate. In addition, the proposal will reduce the need to travel, and minimise the travel time and distances to such ‘everyday’ facilities, which will in turn, ‘claw back’ trade from further afield destinations. This is a

significant benefit to the local economy, and in addition, people are likely to link their trip with other facilities within Westbury rather than elsewhere, which has added benefits.

7.50 Furthermore, the proposal will also encourage further investment in the area, as businesses considering or looking to expand or locate in the area are much more likely to do so when there are supporting facilities for their employees, customers and clients.

7.51 The proposed development will, therefore, achieve positive qualitative impacts through the significant benefits the scheme will deliver to the local economy, environment and social inclusion.

Conclusions

7.52 We have assessed the impact of the proposal having regard to the policy considerations outlined in Section 4. We have considered the implications of the proposed development in policy terms, and draw the following key conclusions:

- The proposal presents no threat to the investment within Westbury town centre on the basis of the impacts identified, and we conclude that the proposal would not deter investment within the centre.
- The impacts associated with the proposal in the design year (2031) are low, and represent no threat to the vitality and viability of Westbury town centre.
- The assessed impacts are not 'significantly adverse', and the proposal is in compliance with the retail guidance in the NPPF.
- The proposal will have significant positive qualitative impacts that will benefit the local economy, environment and social inclusion.

7.53 We, therefore, conclude that the proposed development complies with the 'impact test' set by Paragraph 94 of the NPPF and Core Policy 38 of the Wiltshire Core Strategy.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 This Retail Assessment has been prepared by Grass Roots Planning on behalf of Hawke Ridge Business Park Ltd and Bellway Homes Ltd, in support of a full planning application for the erection of: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works at Hawke Ridge Business Park, Westbury, BA13 4LD.
- 8.2 A proportionate sequential assessment has been carried out, which demonstrates there are no alternative sites within town or edge of centre locations, or other accessible and well connected out of centre locations that should be considered sequential preferable to the application site. On this basis, we consider that the application proposals comply with the sequential test.
- 8.3 A proportionate retail impact assessment has also been undertaken to demonstrate that the proposed development does not generate a significant adverse impact on Westbury town centre. We have assessed the impact of the proposed development having regard to the key policy considerations set out in Paragraph 94 of the NPPF, and have demonstrated that:
- The proposal presents no threat to the investment within Westbury town centre and the proposal would not deter investment within the centre.
 - The impacts associated with the proposal are low, and represent no threat to the vitality and viability of Westbury town centre.
 - The assessed impacts are not ‘significantly adverse’, and the proposal is in compliance with the retail guidance in the NPPF.
 - The proposal will deliver significant positive qualitative impacts that will benefit the local economy, environment and social inclusion.
- 8.4 We, therefore, consider that it has been demonstrated that the application proposals comply with the relevant retail policy tests set out in Paragraphs 91, 92 and 94 of the NPPF, and Core Policy 38 of the Wiltshire Core Strategy. There is, therefore, no retail policy basis on which to resist the proposals for this beneficial development.

Appendix 1 – Retail Tables

Hawke Ridge Business Park, Westbury

TABLE 1: ESTIMATED CONVENIENCE AND COMPARISON GOODS TURNOVERS WITHIN CATCHMENT (2026 AND 2031)

Destination	Total Sales Floorspace (sqm net)	Convenience Goods Floorspace (sqm net)	Convenience Goods Benchmark Sales Density per sqm (£)	% from Catchment Area	Total Catchment Area Derived Convenience Goods Benchmark Turnover in 2026 (£m)	Total Catchment Area Derived Convenience Goods Benchmark Turnover in 2031 (£m)	Comparison Goods Floorspace (sqm net)	Comparison Goods Benchmark Sales Density per sqm (£)	% from Catchment Area	Total Catchment Area Derived Comparison Goods Benchmark Turnover in 2026 (£m)	Total Catchment Area Derived Comparison Goods Benchmark Turnover in 2031 (£m)	Total Catchment Area Derived Benchmark Turnover in 2026 (£m)	Total Catchment Area Derived Benchmark Turnover in 2031 (£m)
STORES/CENTRES WITHIN CATCHMENT AREA													
Westbury Town Centre													
Morrisons, Edward Street	1,559	1,247	10,801	70%	9.43	9.48	312	£8,369	70%	1.83	2.07	11.25	11.54
Aldi, Warminster Road	1,238	990	9,240	80%	7.32	7.35	248	£5,579	80%	1.10	1.25	8.42	8.60
Londis, High Street	90	81	4,267	95%	0.33	0.33	9	£2,790	95%	0.02	0.03	0.35	0.36
Shop and Drive, Warminster Road	72	65	4,267	95%	0.26	0.26	6	£2,790	95%	0.02	0.02	0.28	0.28
Other													
Lidl, Kingfisher Drive, Westbury	1,344	1,075	8,622	80%	7.41	7.45	269	£5,579	80%	1.20	1.36	8.61	8.81
Tesco Express, Fore Street, Westbury	393	354	11,774	90%	3.75	3.77	39	£2,790	90%	0.10	0.11	3.85	3.88
Tesco Express, Leigh Park, Westbury	306	275	11,774	90%	2.92	2.93	31	£2,790	90%	0.08	0.09	3.00	3.02
Premier Stores, The Ham, Westbury	171	154	4,267	95%	0.62	0.63	17	£2,790	95%	0.05	0.05	0.67	0.68
One Stop, Queens Square, Westbury	200	180	4,267	95%	0.73	0.73	20	£2,790	95%	0.05	0.06	0.78	0.79
WESTBURY STORES OUTSIDE CATCHMENT AREA													
Central Stores, Melbourne Street, Bratton	198	178	4,267	25%	0.19	0.19	20	£2,790	90%	0.05	0.06	0.24	0.25
TOTAL	5,570	4,599			32.96	33.13	970			4.50	5.09	37.46	38.21

NOTES:

1. Floorspace figures derived from Wiltshire Retail and Town Centres Study 2020, previous planning applications, Pro Map, GOAD, and Grass Roots Planning assumptions
2. Company average turnover ratios derived from the Wiltshire Retail and Town Centre Study 2020 where available and Grass Roots Planning assumptions
3. Benchmark turnover = net convenience floorspace x sales density
4. Floorspace efficiency at +0.1% per annum for convenience goods and +2.5% per annum for comparison goods applied between 2026 and 2031

AT 2018 PRICES

Hawke Ridge Business Park, Westbury

TABLE 2: ESTIMATED TURNOVER OF PROPOSED DEVELOPMENT (SCENARIO 1 - CONVENIENCE STORE)

Proposed Development	Floorspace (sqm net)	Sales Area (sqm)		Sales Density (£'s per sqm)		% From Catchment Area	Catchment Area Derived Benchmark Turnover (£m) - 2026		Catchment Area Derived Benchmark Turnover (£m) - 2031		Total Catchment Area Derived Benchmark Turnover (£m) - 2031
		Convenience	Comparison	Convenience	Comparison		Convenience	Comparison	Convenience	Comparison	
Convenience Store	292	262	29	£8,940	£2,790	95%	2.23	0.08	2.24	0.09	2.33
TOTAL											

- NOTES:
- 1. Convenience / comparison sales area based on a 90% / 10% split
 - 2. Sales density of proposed store based on Grass Roots Planning assumptions
 - 3. Floorspace efficiency at +0.1% per annum for convenience goods and +2.5% per annum for comparison goods applied between 2026 and 2031

AT 2018 PRICES

Hawke Ridge Business Park, Westbury

TABLE 3: ANTICIPATED TRADING EFFECT OF PROPOSED DEVELOPMENT - 2031 (SCENARIO 1 - CONVENIENCE STORE)

Destination	Total Turnover	Diversion to Proposal		Resultant Turnover	Impact
	2031 £m	Draw %	2031 £m	2031 £m	2031 %
<u>STORES/CENTRES WITHIN CATCHMENT AREA</u>					
Westbury Town Centre					
Morrisons, Edward Street	11.54	25.0%	0.58	10.96	-5.0%
Aldi, Warminster Road	8.60	15.0%	0.35	8.26	-4.1%
Londis, High Street	0.36	1.0%	0.02	0.33	-6.5%
Shop and Drive, Warminster Road	0.28	0.0%	0.00	0.28	0.0%
Sub-Total	20.79		0.95	19.83	-4.6%
Other					
Lidl, Kingfisher Drive, Westbury	8.81	20.0%	0.47	8.34	-5.3%
Tesco Express, Fore Street, Westbury	3.88	15.0%	0.35	3.53	-9.0%
Tesco Express, Leigh Park, Westbury	3.02	10.0%	0.23	2.79	-7.7%
Premier Stores, The Ham, Westbury	0.68	2.0%	0.05	0.63	-6.9%
One Stop, Queens Square, Westbury	0.79	2.0%	0.05	0.75	-5.9%
<u>WESTBURY STORES OUTSIDE CATCHMENT AREA</u>					
Central Stores, Melbourne Street, Bratton	0.25	0.0%	0.00	0.25	0.0%
INFLOW		10.0%	0.23		
TOTAL	38.21	100.0%	2.33	35.89	

NOTES:

1. Turnover in 2031 derived from Table 1
2. Turnover of proposal derived from Table 2
3. Trade diversion based on Grass Roots Planning estimates taking into account location and the type of competing provision
4. Resultant turnover = turnover in 2031 minus trade diversion
5. Impact = resultant turnover expressed as a proportion of 2031 baseline turnover

AT 2018 PRICES

Hawke Ridge Business Park, Westbury

TABLE 4: ESTIMATED TURNOVER OF PROPOSED DEVELOPMENT (SCENARIO 2 - TOTAL RETAIL BUILDING)

Proposed Development	Floorspace (sqm net)	Sales Area (sqm)		Sales Density (£'s per sqm)		% From Catchment Area	Catchment Area Derived Benchmark Turnover (£m) - 2026		Catchment Area Derived Benchmark Turnover (£m) - 2031		Total Catchment Area Derived Benchmark Turnover (£m) - 2031
		Convenience	Comparison	Convenience	Comparison		Convenience	Comparison	Convenience	Comparison	
Retail Building	648	454	194	£8,940	£2,790	90%	3.65	0.49	3.67	0.55	4.22
TOTAL											

NOTES:

- 1. Convenience / comparison sales area based on a 70% / 30% split
- 2. Sales density of proposed store based on Grass Roots Planning assumptions
- 3. Floorspace efficiency at +0.1% per annum for convenience goods and +2.5% per annum for comparison goods applied between 2026 and 2031

AT 2018 PRICES

Hawke Ridge Business Park, Westbury

TABLE 5: ANTICIPATED TRADING EFFECT OF PROPOSED DEVELOPMENT - 2031 (SCENARIO 2 - TOTAL RETAIL BUILDING)

Destination	Total Turnover	Diversion to Proposal		Resultant Turnover	Impact
	2031 £m	Draw %	2031 £m	2031 £m	2031 %
<u>STORES/CENTRES WITHIN CATCHMENT AREA</u>					
Westbury Town Centre					
Morrisons, Edward Street	11.54	27.0%	1.14	10.40	-9.9%
Aldi, Warminster Road	8.60	14.0%	0.59	8.01	-6.9%
Londis, High Street	0.36	0.5%	0.02	0.34	-5.9%
Shop and Drive, Warminster Road	0.28	0.5%	0.02	0.26	-7.4%
Sub-Total	20.79		1.77	19.01	-8.5%
Other					
Lidl, Kingfisher Drive, Westbury	8.81	20.0%	0.84	7.97	-9.6%
Tesco Express, Fore Street, Westbury	3.88	12.0%	0.51	3.38	-13.0%
Tesco Express, Leigh Park, Westbury	3.02	9.0%	0.38	2.64	-12.6%
Premier Stores, The Ham, Westbury	0.68	1.0%	0.04	0.64	-6.2%
One Stop, Queens Square, Westbury	0.79	1.0%	0.04	0.75	-5.3%
<u>WESTBURY STORES OUTSIDE CATCHMENT AREA</u>					
Central Stores, Melbourne Street, Bratton	0.25	0.0%	0.00	0.25	0.0%
INFLOW		15.0%	0.63		
TOTAL	38.21	100.0%	4.22	33.99	

NOTES:

1. Turnover in 2031 derived from Table 1
2. Turnover of proposal derived from Table 4
3. Trade diversion based on Grass Roots Planning estimates taking into account location and the type of competing provision
4. Resultant turnover = turnover in 2031 minus trade diversion
5. Impact = resultant turnover expressed as a proportion of 2031 baseline turnover

AT 2018 PRICES



grassroots PLANNING

Grass Roots Planning Ltd
Suites 9 & 10
Bristol North Baths
Gloucester Road
Bristol
BS7 8BN

t: 0117 930 0413 grassroots-planning.co.uk