

**THOULSTONE PARK,
CHAPMANSLADE, WILTSHIRE**

RETAIL STATEMENT FOR 18/05086/FUL

ASSESMENT OF THE PROPOSED FARM SHOP

SUBMITTED ON BEHALF OF JAMES HUGHES-HALLETT

9 July 2018 - Final Report

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1 INTRODUCTION

- 1.1 This Retail Statement has been prepared on behalf of James Hughes-Hallett (the “Applicant”) in support of a full planning application for an Eco-Leisure Proposal (a holiday resort complex) at Thoulstone Park, (Planning Ref: 18/05086/FUL).
- 1.2 The description of the proposed resort development is as follows: *“Demolition of former golf club and driving range buildings at Thoulstone Park. Construction of self-catering holiday accommodation, restaurant, farm shop, conference space, spa treatment rooms, leisure pool and community hall. With staff accommodation, car parking and associated landscaping works.”*
- 1.3 This Retail Statement sets out the retail impact and sequential tests carried out in line with paragraphs 24 to 27 of the NPPF and Core Policy CP38, and in relation to the proposed farm shop only. This methodology is also in line with the advice received from Wiltshire Council (the “Council”) as part of the pre-application engagement.
- 1.4 The application submission is accompanied by other technical documents which need to be read in conjunction with this Retail Statement in order to inform the Council’s overall decision making on the proposal.
- 1.5 This Statement is structured as follows:
 - Section 2 - details the factual background relating to the site and surrounding area, and provides a description of the proposed development;
 - Section 3 - summarises the relevant planning policies;
 - Section 4 - sets out the sequential assessment;
 - Section 5 - provides an assessment of predicted retail impacts; and
 - Section 6 - identifies the key conclusions.

2 APPLICATION SITE & PROPOSED DEVELOPMENT

The Application Site

- 2.1 Thoulstone Park is located close to the villages of Chapmanslade and Upton Scudamore, covering a total area of approximately 62 ha. The main settlements nearby include Frome, Westbury, and Warminster.
- 2.2 The application site extends to 39 ha, and is considered to be previous developed land (see the Planning Statement).
- 2.3 The application site is defined as being “out-of-centre” in retail policy terms, and does not benefit from retail allocation in the development plan.

The Proposal

- 2.4 The aim of the planning application in question is to accommodate Natural Retreats’ self-catering holiday resort complex. The Design and Access Statement provides a detailed description of the development and the following is only intended to provide a brief summary. The site is essentially split into the following sections:
 - The holiday accommodation area, comprising 28 self-catering holiday accommodation units;
 - The car park (with 173 space);
 - Outdoor Sports and Games area;
 - A small provision of Staff accommodation;
 - The Parkland, including an “pay and play” golf course, walking paths; and
 - The “Market Yard” - this comprises two buildings.
 - The “leisure” building is a 1,015 sqm leisure building comprising a multi-purpose community hall, swimming pool and changing facilities.
 - The “central” building is 1,950 sqm in size and hosts a restaurant, a farm shop (347 sqm GIA and sales area) and conference space, with a small provision for spa treatment rooms.
 - The Garden area – here the produce is grown for the restaurant and the farm shop.
- 2.5 As mentioned before, this Retail Statement only deals with the proposed farm shop.
- 2.6 The farm shop is to sell the produce from the proposed garden area, and other convenience goods to cater for the likely needs of the visitors to the resort and the staff.

3 RETAIL POLICY CONTEXT

- 3.1 This section provides a summary of the relevant retail planning policy and guidance at the national and local levels, relevant to our assessment of the farm shop. A comprehensive review of the context for the development as a whole is provided in the Planning Statement.
- 3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined “*in accordance with the [development] plan unless material considerations indicate otherwise*”. The policies contained in the NPPF are material considerations in the determination of planning applications (paragraphs 13 and 212, the Framework) and; “*because this is government policy, it is likely always to merit significant weight*”.¹

National Policy and Guidance

- 3.3 The National Planning Policy Framework (NPPF) recognises the important role that development can bring in promoting healthy and competitive town centre environments. In order to protect the role of town centres as the “heart of their community” the Framework requires that when determining applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date Local Plan the Local Planning Authority should apply the sequential and impact ‘tests’.
- 3.4 The policies ‘ensuring the vitality of town centres’ are set out at paragraphs 22 to 27 inclusive. Paragraph 23 states that the needs for retail and leisure are to be met in full and are not to be compromised by limited site availability.
- 3.5 The NPPF explains that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. Paragraph 24 states that authorities should; “*require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. 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*”. The NPPF also states that applicants and LPAs should; “demonstrate flexibility on issues such as format and scale” (paragraph 24).
- 3.6 Paragraph 26 requires applications for retail and leisure development outside of town centres and above 2,500 sqm (or any locally set threshold), which are not in accordance with an up to date Local Plan, to be accompanied by an impact assessment. This should include assessment of:

¹ Paragraph 42, Suffolk Coastal v Hopkins Homes Limited, Richborough Estates Partnership LLP v Cheshire East Borough Council, [2016] EWCA Civ 168

- The impact on existing, committed and planned public and private investment in a centre or centres in the catchment; and
 - The impact of the proposals on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.
- 3.7 The NPPF states in paragraph 27 that applications should only be refused where they fail to satisfy the sequential test or are likely to have significant adverse impact on one of the factors set out in paragraph 26. This document looks at the sequential test in more detail in Chapter 5, and at the impacts tests in Chapter 6.
- 3.8 The Planning Practice Guidance (PPG) was initially published online in March 2014 and it supports policies within the NPPF. It includes important guidance on town centres and the application of both the sequential and impact tests. Of relevance to this proposal, Section 14 sets out guidance supporting paragraphs 23-27 of the NPPF in seeking to ‘Ensure the Vitality and Viability of Town Centres’ and provides further detail in respect of undertaking sequential and impact assessments. In respect of impact, the PPG recognises that impact should be assessed on a ‘like-for-like’ basis in a particular sector and that retail uses tend to compete with their most comparable competitive facilities.
- 3.9 Further consideration of the national policy and guidance on retail impact and the sequential approach is provided in Sections 4 and 5 of this Assessment.

The Development Plan

- 3.10 The Development Plan consist of the Wiltshire Core Strategy (2015) incorporating saved policies from district local plans, Chippenham Site Allocations Plan, Minerals and Waste Plans and made Neighbourhood Plans. Wiltshire Council is currently reviewing the Wiltshire Core Strategy. The Local Plan Review is currently at the Issues and Opportunities Consultation which took place between November and December 2017. The Draft Joint Spatial Framework is expected to be introduced in in autumn 2018.
- 3.11 The Core Strategy seeks to focus future retail and leisure development within existing town centres to ensure their long-term vitality and viability.
- 3.12 As such, **Core Policy 38 (CP38)** requires any retail or leisure development in excess of 200 sqm 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.
 - comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available.
- 3.13 It should be noted at the outset that we consider that the wording of CP38 in relation to impact does not comply with the NPPF: the test for passing the retail impact test is to demonstrate that the proposal will have no “*significant adverse impact*”, as opposed to have “*no harm*” – see para 27 of the NPPF. As such, on the basis

that the proposed farm shop is larger than the locally set threshold (347 sqm vs 200 sqm), retail impact test, as set out by the NPPF only, applies.

The Evidence Base

- 3.14 The Council's most recent retail evidence base comprises the Wiltshire Core Strategy Retail Review, prepared by GVA in 2015 ("the RR2015"), and forms part of the wider evidence base for the emerging Local Plan. It updates the previous study "Town Centre and Retail Study" undertaken in 2011 (RS2011), which was more comprehensive and covered matters such as health checks. The RR2015 updates the quantitative assessment but whilst relying on the same household survey data commissioned for the RS2011, which identified shopping patterns across the defined study area and underpins the retail capacity assessment. Therefore, both studies share the same base shopping patterns data for convenience and comparison goods shopping across the 28 study area zones. However, due to store openings and commitments granted planning permission since 2011, the market shares for the main settlements have been amended by the RR2015 to take into account, where necessary, the impact of this new retail floorspace.
- 3.15 For the purposes of our assessment, we have also reviewed the Mendip Town Centre Study 2010 ("Mendip Retail Study") to inform our assessment of impact on Frome town centre.

4 SEQUENTIAL ASSESSMENT

- 4.1 This section assesses the application site and other potential sites for development in terms of their availability, suitability and viability to accommodate the proposed scheme. Our appraisal has been prepared in the context of national and Local Plan policy, and the advice set out in the PPG. We have also taken account of other material considerations, including recent and relevant Supreme Court, High Court, appeal and called-in decisions, which provide guidance on how the sequential test should be applied.

Sequential Assessment – Approach and Context

- 4.2 Paragraph 24 of the NPPF, requires applications for main town centre uses to be:

“... located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. 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. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale” (emphasis added)

- 4.3 In terms of relevant Case Law pertaining to the interpretation and application of the sequential test the recent **Aldergate Properties Ltd vs Mansfield DC High Court Judgement** (8 July 2016), when discussing the recent case law on the application of the sequential test explained that: *“Policy interpretations arising from litigation may be context and argument specific, and not intended as substitutes for the text at issue for all cases and contexts. The good sense of the planning consequences of any given interpretation may be a guide to its correctness.”* (emphasis added). In other words, whilst the Case Law to-date may provide guidance on how to correctly carry out the sequential test, each case must be assessed on its own merits in the context of its individual circumstances and in the limits of rationality. As such, below we review appeal decisions that we see as most relevant to the assessment of the proposal in question.
- 4.4 The interpretation and application of “flexibility” and how it is applied to the assessment of the ‘availability’ and ‘suitability’ of sites as part of the sequential test has been subject to significant discussion (via Appeals and Case Law), since the publication of the NPPF and PPG. For the purposes of assessing the application in question, we consider that the most relevant point to consider is whether as part of demonstrating flexibility, the farm shop element should be sub-divided from the rest of the proposal.
- 4.5 The most relevant and comparable appeal decision to the current application is the **Rushden Lakes Call-In Decision** (APP/G2815/V/12/2190175). The proposal included the redevelopment of the old Skew Bridge Country Club and dry ski slope on the edge of Rushden into a scheme including retail units, restaurants and a lakeside visitor centre, along with a hotel, leisure club and boat house were seen as a threat to existing retail centres at Corby, Kettering and Northampton. As such the Rushden Lakes scheme and the proposed development at Thoulstone are similar in nature, as both provide a leisure destination which is made up of a number of uses. The appeal decision discussed the matter of disaggregate. It was found that there was no

requirement to disaggregate the individual elements of the proposal to satisfy the sequential test in relation to demonstrating flexibility. It was found that it would be inappropriate to locate parts of that scheme elsewhere.

- 4.6 A similar conclusion was reached by the decision at **Scotch Corner Call-In Decision** (APP/V2723/V/15/3132873) in December 2016. Here the application was for a designer outlet centre. It was not necessary to disaggregate the individual units that made up the overall proposal.
- 4.7 Furthermore, the PPG provides clarification on how flexibility should be applied, and on how locational requirements be considered in the sequential test:

“Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification.” (Paragraph: 011 Reference ID: 2b-011-20140306)

- 4.8 The purpose of the proposed farm shop is to sell the produce from the proposed garden, and to generally cater for the immediate basic convenience needs of the visitors and guests of the proposed self-catering holiday park. In other words, the proposed farm shop is not designed to be an attraction in its own right, but rather an ancillary use to support the wider operation of the holiday park. This is reflected in its relatively small size (347 sqm), and its physical integration into the wider site: given that the farm shop’s business model is wholly reliant on being located in the context of the wider holiday park operation, the proposed unit has been designed accordingly. For example, the farm shop’s staff will have access to the wider facilities, including toilets, kitchen, office and the staff room, as none of these facilities are provided with the farm shop.
- 4.9 The relationship between the farm shop and the wider holiday resort operation is thus paramount. Locating the farm shop anywhere else other than at the application site would defeat its purpose and operation. As such, it is considered that the proposed farm shop has particular market and locational requirements. On this basis, it could not be disaggregated from the rest of the scheme as part demonstrating flexibility; it also means that any other sequential candidate site, would automatically be “unsuitable” for the proposed development.
- 4.10 We therefore conclude that the sequential test is passed by the proposed farm shop.

5 IMPACT TEST

5.1 This section sets out the key assumptions and forecasts underpinning the assessment of the economic (trading) implications of the proposed farm shop, and describes the key findings. The assessment has been carried out in accordance with the NPPF and other material considerations, including the Planning Practice Guidance (PPG).

Policy Context

5.2 The NPPF provides policy relating to the impact test for ‘main town centre’ uses and states in paragraph 26 that applications such as this proposal for new retail floorspace should be supported by an “assessment of:

- *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*
- *The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made”.*

5.3 Paragraph 27 of the NPPF states that “*where an application ... is likely to have significant adverse impact on one or more of the above factors, it should be refused.*”

5.4 It is not necessary to demonstrate a quantitative need or capacity for the proposal. However, addressing qualitative deficiencies that result in trade leakage is a factor to consider.

Impact Methodology and Approach

5.5 Impact has been assessed using CJ’s in-house CREATE economic model. This Excel-based model has been developed over a number of years in compliance with policy and good practice, and is based on a transparent ‘step-by-step’ goods-based approach, which enables the judgements and factors underlying them to be fully explained and tested. This is fully in compliance with the “Impact test: decision-taking” diagram set out by the NPPG (Paragraph: 018 Reference ID: 2b-018-20140306).

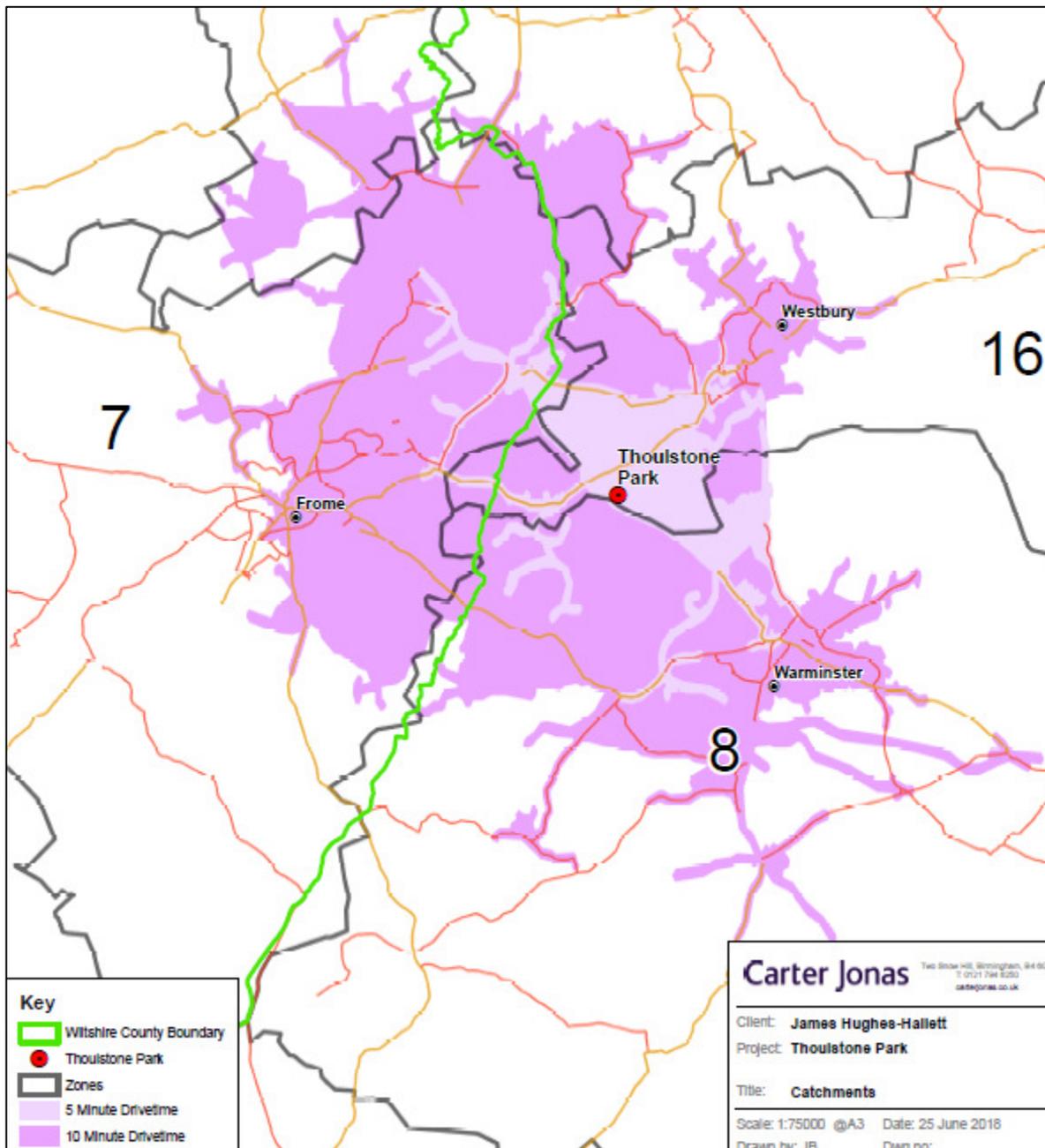
5.6 Ultimately, the assessment will analyse the potential impact on the trade/turnover performance of Warminster, Westbury, and Frome, and their overall vitality and viability; including a review of their roles and function as centres, their overall health, trading characteristics, and the nature of the proposed development. It also considers the wider impact the proposal would have on local consumer choice and trade. The assessment is informed by an updated high-level health checks of the three town centres.

5.7 As highlighted previously, the impact assessment was carried out in accordance with the NPPF and PPG. The following assumptions and baseline data have been used to inform the retail impact assessment:

Catchment Area Definition

- 5.8 As stated above, the aim of the farm shop is to serve the immediate convenience needs of the holiday makers staying at the proposed holiday park. It is anticipated that such visitors could be coming from all over the country, and as such it is not possible to draw up an exact catchment area.
- 5.9 It is also likely that the farm shop would serve the more immediate population, such as those visiting the park as part of their weekly/monthly routine, for example for a regular beauty treatment at the park's spa, to use the gym, or to dine at the restaurant. Such visitors may choose to pop-into the farm shop as part of their visit to pick up some essentials. On this basis it is anticipated that the "local" catchment area would be that within a 10 minute drive.
- 5.10 Within the Local catchment Area (LCA) there are three designated town Centres: Warminster Market Town, Westbury Market Town and Frome (located in Mendip Council's administrative area).

Figure 5.1 – Local Catchment Area



Timeframe for Assessing Retail Impact

5.11 The NPPF requires consideration of impact up to five years from the time the application is made (see para 26). The application is submitted in 2018, which will be taken as the base year, with 2023 forming the assessment year at which the potential impact of the proposed scheme will be assessed.

Turnover of the proposal

- 5.12 As highlighted in Section 2, the proposed farm shop will provide a total net sales area of 347 sqm. The farm shop would sell primarily convenience goods, albeit it is anticipated that up to 10% of the total floorspace (i.e. 3.5 sqm) could be used for the sale of ancillary comparison goods.
- 5.13 In considering an appropriate sales density from which to estimate the scheme's turnover we have reviewed the average sales density sourced from Mintel's Retail Rankings (April 2017). Given the nature of the proposal we estimate that the sales density would not exceed £4,500 per sqm at the base year (2018), thus generating a maximum turnover of £1.56 million in 2018. This is on the basis that the products sold will be of high value but not sold in the same volume as at a typical foodstore.
- 5.14 The base year turnover figures are forecasted to 2023 using a year-on-year 'productivity' growth rate for convenience floorspace, which is derived from Figure 4b of the Retail Planner Briefing Note 15. Productivity for convenience good turnover is expected to fall on average by approximately -0.1% between 2018 and 2023. This results in a turnover of **£1.56m at 2023** for the proposed convenience goods floorspace. The relevant forecasts are presented in the table below.

Table 5.2 - Turnover of the Proposed Retail Floorspace

Sales area (sqm)	Sales Density at 2018 (£/sqm)	Turnover (£m)					
		2018	2019	2020	2021	2022	2023
347	4500	1.56	1.56	1.56	1.56	1.56	1.56
Productivity growth (%)			-0.2	0	0	0	0

Trade Draw from the Catchment Area

- 5.15 As stated above, the proposed farm shop is likely to attract visitors from all over the country on the basis that it would be serving the holiday makers at the proposed holiday park. It is thus anticipated that at least 60% of the farm shop's turnover would be generated by such visitors i.e. £0.94 m. The remaining 40% (i.e. **£0.62 m**) would be drawn from the LCA, either by diverting trade from the existing convenience facilities within the 10-minute drive time of the proposal or by clawing back expenditure currently leaking outside of the LCA.
- 5.16 Within the LCA the main convenience provisions are as follows:
- In Warminster town centre there are four major supermarkets in the centre: Waitrose, Morrisons, Lidl and Iceland.
 - The convenience offer in Westbury town centre consists of Aldi and Morrisons.
 - Frome town centre hosts M&S Simply Food, Iceland, and Co-op.

- Within the LCA, there are also a number of relatively large food stores outside of these centres² which could also lose trade to the proposed farm shop: these are namely the Asda Superstore in Frome, Lidl in Frome³, as well as a number of smaller convenience stores⁴.

5.17 To understand how trade is likely to be diverted from the above centres, it is firstly important to understand how these function and the degree of “like-upon-like” impact anticipated. As such, below we set out a high level review of their relative role and function, and the overall health checks.

Town Centres Health Checks

5.18 The health check information for Westbury and Warminster has been drawn and summarised from the RS2011 and updated where possible. The health check information for Frome was sourced from the Mendip Retail Study and has been updated where possible; we have also drawn on 2017 “Town Benchmarking Report” by People and Places.

5.19 **Warminster** is a relatively large market town, with an affluent catchment area. Out of the three centres, it is the closest to the application site. Retail uses in Warminster are located in a linear formation along a busy main road and designated car parks are located behind retail frontages. There are a strong representation of comparison units and service units. There is also a strong representation of convenience offer with Waitrose, Morrisons, Lidl and Iceland, as well as a number of independent providers. The RS2011 found that vacancy rates are broadly in line with the national average, and our assessment has not found any significant concentration of vacant units. Overall the centre has a pleasant, historic, environment. It would appear that the centre is vital and viable, and adequately meets its role and function as market town.

5.20 **Westbury** town centre retail offer includes a broad range of comparison retailers. These are generally independently operated, but the provision is complemented by several multiple retailers including four charity shops and a Boots the Chemist. Overall the retail composition would appear to be aimed at a budget shopper. The convenience offer in Westbury consists of Aldi and Morrisons, and it would appear that these are the key anchors of the centre. Additional convenience provision is comprised of independent retailers and is relatively small-scale in nature. The service uses dominate the town centre, which is not surprising for a market town. The quality of the service provision is generally good in areas around the Market Place, although there is a lower standard of provision in the areas around the High Street and Edward Street. Overall we consider that Westbury has a function of a Local Centre (as opposed to a Market Town) where it primarily serves the basic needs of the immediately local population.

5.21 **Frome** is the largest of the Mendip towns, with an affluent catchment area. Its historic character and artisan reputation have helped create a vibrant town centre with a wide range of shops and retail offer. The town

² Such as a number of Tesco Express stores, and small Coop stores.

³ Garsdale Road

⁴ Warminster Road

centre has a high footfall, which is attributed to a strong and popular retail offer coupled together with the weekend market. The convenience provision is made of M&S Simply Food, Iceland, and Co-op, as well as smaller independent stores. Overall the town performs a role for service provision, convenience retailing and lower and middle order comparison retailing for both local residents and the wider rural area. Only 3% of the commercial units in the town centre were vacant in 2017, which is lower than the national average. It is considered that the town centre is therefore vital and viable.

- 5.22 On the basis of the above, the following sets out our assessment of the likely draw the proposed farm shop would have from the above centres.

Trade Draw and Impact

- 5.23 It is considered that the majority (65%) of the farm shop's trade (drawn from LCA) would be taken from Warminster. This is on the basis that this is a larger centre with a more diverse convenience offer and is the closest to the application site.
- 5.24 We estimate that around 10% would be drawn from Frome. We considered that Frome has an affluent population that would be more likely to visit the proposed development. It is also considered that the farm shop would offer a higher quality range of goods, and would act as a novelty experience to those currently shopping in Frome town centre.
- 5.25 On the basis that Westbury currently attracts budget local shoppers, we consider that it is unlikely that a large proportion of Westbury's shoppers would be attracted to the high-end offer at the proposed farm shop, regardless of its relatively close proximity to the application sites. As such we estimate that no more than 10% of the farm shops' trade would be drawn from Westbury.
- 5.26 The remaining 15% would come from the other stores in the LCA, and primarily from the larger stores such as Asda Superstore and Lidl in Frome.
- 5.27 The RR2015 provides the convenience turnover of Warminster and Westbury at 2019 and at 2024. As such we have calculated the convenience turnover at 2023 on pro-rata basis. The Mendip Retail Study also provides figures from which it is possible to calculate the convenience turnover of Frome town centre at 2021 and 2026 (see Tables 10 and 11a of Appendix 3). As such we have calculated the convenience turnover at 2023 on pro-rata basis.
- 5.28 We are not aware of any convenience commitments that would alter the turnover of the respective town centre at 2023.

Table 5.3 – Town Centres’ Turnover, Trade Diversion and Impact

	TC Turnover 2023	Draw of the Proposal		TC Turnover	Impact
		%	£		
Warminster	49.3	65%	0.41	48.9	-0.8%
Westbury	12.4	10%	0.06	12.3	-0.5%
Frome	7.2	10%	0.06	7.2	-0.9%
Other in ILC		15%	0.09		
TOTAL		100%	0.62		

- 5.29 The table above shows that the proposed farm shop would result in an impact of -0.5% on the convenience goods turnover of Westbury, an impact of -0.8% on Warminster, and -0.9% on Frome. In quantitative terms, these impact figures are considered to be very low / insignificant. These figures would be even lower, if the impact is to be assessed against the total turnover of the town centre i.e. including the comparison turnover and the service trade.
- 5.30 We also consider that in qualitative terms, after taking into account the respective health of the town centres, the identified level of impact would not be significant. It is very unlikely that any of the stores in the respective town centres would close as a result of the proposed farm shop. It is our judgement that the proposed farm shop would not replace the convenience shopping currently undertaken in the respective town centres, but merely complement it on an ad hoc basis.
- 5.31 Based on the above, we conclude that the proposed farm shop would not result in a “significant adverse” impact on Warminster, Westbury or Frome town centres.

Impact on Investment

- 5.32 We are not aware of any relevant investments at Warminster, Westbury or Frome town centres that would be impacted by the proposal.

Summary

- 5.33 Taking account of the findings of trade diversion and associated impact of the proposed scheme we conclude that there is no evidence that the proposed scheme will result in a significant adverse impact on Warminster, Westbury or Frome town centres. Specifically and in line with paragraph 26 of the NPPF, the scheme will not lead to a significant adverse impact on existing or planned investment, trade and/ or overall vitality and viability for the three town centres. As such, the proposed scheme complies with paragraph 27 of the NPPF.

6 CONCLUSIONS

- 6.1 This Retail Statement has assessed the retail impact and sequential test issues arising from the application proposal in compliance with the Council's development plan documents and the NPPF.
- 6.2 The sequential assessment has clearly demonstrated that there are no sequentially preferable sites that are available or suitable to accommodate the proposed retail floorspace, even assuming some flexibility in terms of format and scale.
- 6.3 The retail impact assessment has identified that the proposal is unlikely to result in a "significant adverse impacts" on Warminster, Westbury or Frome town centres.