Development Management Plan (Regulation 19)

Retail Impact Threshold

October 2017

Reigate & Banstead
BOROUGH COUNCIL
Banstead | Horley | Redhill | Reigate

1. Introduction

1.1 This paper has been prepared to support the Regulation 19 Development Management Plan.

1.2 To inform the Regulation 18 Development consultation, a town centre evidence paper[1] was produced which proposed a retail impact threshold.

1.3 This paper has been prepared to review the proposed threshold to take into account changes within the town and local centres (for example, planning permissions granted and changes of use) and to reflect the comments received at the Regulation 18 Development Management Plan Consultation.

[1] http://www.reigate-Banstead.gov.uk/downloads/file/2637/town_centres

2. Policy Context

National Guidance

National Planning Policy Framework (2012)

2.1 Paragraph 26 of the National Planning Policy Framework[2] (NPPF) requires retail impact assessments for retail developments outside of town centres, which are not in accordance with up-to-date Local Plans, if the development is over a proportionate locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500sqm.

2.2 Paragraph 26 of the NPPF says that a retail impact assessment should include:

- 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 viability and vitality, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made (for major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made)

National Planning Practice Guidance (2014)

2.3 The National Planning Practice Guidance[3] (NPPG) says that local planning authorities should plan to positively support town centres to generate local employment; promote beneficial competition within and between town centres; and create attractive, diverse places where people want to live, visit and work.

2.4 In order to assess the viability and vitality of town centres, the NPPG says that the following factors should be taken into consideration:

- The diversity of uses
- Proportion of vacant street level property
- Commercial yields on non-domestic property
- Customers views and behaviour
- Retailer representation and intentions to change representation
- Commercial rents
- Pedestrian flows
- Accessibility
- Perception of safety and occurrence of crime

[2] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
[3] https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres

2.5 The NPPG highlights the importance of a “town centre first” approach but recognises that it may not be possible to accommodate all forecasted needs within town centres due to physical or other constraints. In these circumstances, NPPG says that planning authorities should plan positively to identify the most appropriate alternative strategy having regard to the sequential and impact tests.

Local Evidence Base

Core Strategy (2014)

2.6 The Core Strategy[4] supports the management, growth and role of the borough’s retail centres.

2.7 Policy CS7 of the Core Strategy outlines the retail hierarchy:

- Primary town centre: Redhill
- Town centres: Reigate, Horley and Banstead Village
- Local centres

Retail Needs Assessment (2016)

2.8 To inform the Regulation 18 Development Management Plan consultation, Reigate & Banstead Borough Council commissioned Peter Brett Associates to undertake a retail needs assessment[5] in 2016. As part of this assessment, Peter Brett Associates assessed the town centre performance and vulnerability.

Regulation 18 Development Management Plan Town Centre Evidence Paper

2.9 The Regulation 18 Development Management Plan Town Centre evidence paper outlined the rational for introducing a local threshold and then determined an appropriate threshold.

2.10 In order to outline the rational for introducing a local threshold, the paper:

- Compared the national impact assessment threshold (2,500sqm) to current retail provision within the borough
- Assessed the town centre performance/ vulnerability

2.11 To determine an appropriate threshold, the paper considered:

- The point at which lost trade is likely to begin to impact upon the viability of centres, using vacancy targets as a proxy

[4] http://www.reigate-banstead.gov.uk/downloads/file/3073/adopted_core_strategy_july_2014
[5] http://www.reigate-banstead.gov.uk/downloads/file/2634/reigate_and_banstead_retail_needs_assessment_volume_1_report

- Average retail store sizes within existing centres
- Assessed the retail development proposals and retailer modes/ formats

2.12 The Regulation 18 Development Management Plan Town Centre evidence paper recommended a retail impact assessment of:

- 150sqm for comparison retail
- 250sqm for convenience retail
- 2,500sqm (national threshold) for all other town centre uses
- Where the end retail use is unclear or the operator/ retailer is unspecified, the impact assessment should be based on the lower of the two thresholds.

3. Retail Impact Assessment Review

3.1 During the Regulation 18 Development Management Plan consultation, a number of responses were received which felt that the proposed threshold was too low compared to national guidance.

3.2 The Regulation 18 Development Management Plan recommended standards have been reviewed to take into account changes since the previous report was prepared (for example, planning permissions granted and changes of use). The same methodology has been used.

Review for the Rationale for Introducing a Locally Set Threshold

Comparison of National Threshold to Current Local Retail Provision

3.3 The Regulation 18 Development Management Plan town centre evidence paper concluded that the nationally prescribed 2,500sqm threshold was inappropriate for Reigate and Banstead borough.

3.4 The paper compared the national standard to existing comparison and convenience retail units within the town and local centres and considered that the effects on trade draw and vitality/ viability would start to be felt significantly below the national threshold.

3.5 Since the Regulation 18 Development Management Plan town centre paper was produced there have been no new developments in the borough's town and local centres.

3.6 The table below shows that new development of 2,500sqm would be the equivalent of 28-45% of the total existing convenience floorspace and 10-62% of the total existing comparison floorspace within each of the borough's town centres.

Table 1 Town Centres

Town	Convenience		Comparison		Total	
	Total Floorspace (sqm)	2,500sqm as a %	Total Floorspace (sqm)	2,500sqm as a %	Total Floorspace (sqm)	2,500sqm as a %
Banstead	5,592.5	44.7%	4,035.0	62.0	16,069.3	15.6
Reigate	7,555.0	33.1%	10,397.0	24.0	46,298.0	5.4
Redhill	8,960.9	27.9%	24,889.7	10.0	46,690.5	5.4
Horley	7,996.4	31.3%	5,702.6	43.8	21,110.4	11.8
Total	30,104.8	8.3%	45,024.3	5.6	130,168.2	1.9

3.7 The table below shows that a new development of 2,500sqm would be the equivalent of 40% of the total existing convenience floorspace and 39% of the total existing comparison floorspace within the local centres.

Table 2 Local Centres

	Convenience		Comparison		Total	
	Total Floorspace (sqm)	2,500sqm as a %	Total Floorspace (sqm)	2,500sqm as a %	Total Floorspace (sqm)	2,500sqm as a %
Local Centres	6,217.0	40.2	6,404.0	39.0	33,735.5	7.4

3.8 It is therefore considered that the borough's town and local centres would experience adverse effects in terms of trade draw and competing investment and therefore on vitality and viability at a scale of development significantly below the national threshold.

Town Centre Performance/ Vulnerability

3.9 To inform town centre performance/ vulnerability, the Regulation 18 Development Management Plan town centre evidence paper referred to the Retail Needs Assessment.

Banstead Village

3.10 The Retail Needs Assessment concluded that Banstead Village performs well against the majority of health check indicators. Venuescore classifies Banstead as a district grade centre; however, it has the lowest rank nationally of all of the borough's centres at 943. The centre is focussed towards the mid-high end of the market with a number of national retailers and food and drink operators.

3.11 The Retail Impact Assessment felt that the comparison sector within Banstead Village is vulnerable to further trade loss. It found that Banstead Village was not a popular location within its catchment for comparison shipping. Competing locations at Kingston, Sutton and Croydon were all found to exert significant influence over spending patterns within Banstead's catchment. As a result, the leakage of comparison spending within Banstead Village's two closest catchments (Zone 5 and 6) to shopping locations outside of the borough is between 82% to 92%. Based on survey work, the Retail Needs Assessment identified that the town centre has a very low sales density in the comparison sector, at only £2,994/sqm compared to a benchmark of £6,000/sqm.

3.12 The Retail Needs Assessment found that Banstead Village fared better in terms of convenience spend retention, with between 40% and 66% of spend within its two closest catchments retained within the borough. The majority of retained spend, particularly in Zone 5, was found to be retained within the town centre. However, locations outside of the borough featured in the top three most popular convenience destinations – this suggested that locations outside of the borough have a significant influence on convenience spend.

3.13 The Retail Needs Assessment found that Banstead has limited physical capacity for expansion and does not experience any notable retailer demand to locate within the centre.

3.14 Since the Retail Needs Assessment was prepared, there have been no notable changes to the town centre's performance/ vulnerability. These comments are therefore felt to be an accurate representation of the town centre's performance/ vulnerability.

Horley

3.15 The Retail Needs Assessment identified Horley as a small town centre which is underperforming against a number of key health check criteria. The town centre is identified as being focused at the low-mid end of the market and has limited representation from national retailers. Venuescore classifies the town as a district grade centre and it is the second lowest ranked of all of the borough's town centres (at 918).

3.16 In terms of its role and function, the Retail Needs Assessment concluded that Horley town centre predominantly serves local convenience and service retail needs.

3.17 The Retail Needs Assessment notes that the town has a below average representation from comparison retailers, with very few national retailers (only one GOAD key attractor) and a poor selection in terms of fashion and footwear retailers. As a result, comparison goods spend leakage from Horley's core catchment (Zone 3) is relatively high, with more than 77% of spend going to locations outside of the borough. The report found that Horley town centre is the second most popular location for comparison spend for residents in its home catchment, with Crawley exerting significant influence on spend patterns in the area. As a result of the under-representation and low quality of the offer, the Retail Needs Assessment found that the town has the lowest comparison sales density of all of the borough's main centres at £2,089/sqm, significantly below the benchmark of £6,000/sqm.

3.18 The Retail Needs Assessment found that Horley town centre exerts a greater influence over convenience goods spend within its core catchment; however, at 41% this is the second lowest of the borough's town centres. Whilst some stores trade particularly well (e.g. the Waitrose which was identified as overtrading), the town experiences significant competition and trade draw from the nearby out-of-town Tesco store at Hookwood. Unlike the borough's other towns, the retention of convenience retail expenditure has fallen slightly from 35.4% (2006) to 34.3% (2016).

3.19 The Retail Needs Assessment identified physical capacity to expand provision and accommodate new provision within Horley; however, recommended that in the short term the focus should be on consolidating and improving the existing offer. The Retail Needs Assessment identified limited demand from retailers/ operators to location within the town centre. The Assessment considers that Horley town centre was comparatively vulnerable to trade loss from out-of-centre developments.

3.20 Since the Regulation 18 Development Management Plan town centre evidence paper was produced there have been no notable changes to the town centre's performance/ vulnerability. These comments are therefore felt to be an accurate representation of the town centre's performance/ vulnerability.

Redhill

3.21 The Retail Needs Assessment found Redhill to be a medium sized town with good representation from mid-market national retailers. Venuescore classifies Redhill as a sub-regional grade centre and it is the highest ranking of all of the borough's centres (at 253). The town centre was found to perform relatively well against health check statistics, but has amongst the highest vacancy rate of all of the borough's centres. 71% of the vacant units were in the primary shopping area. The resident's survey part of the Retail Needs Assessment identified the need to improve the offer within the town centre.

3.22 The Retail Needs Assessment identified Redhill has having a comparatively high proportion of comparison retail provision; however, the clothing and footwear offer was found to be particularly limited and positioned largely at the value-mid range. Redhill has 15 of 31 key GOAD attractors. Retention of comparison spend at locations in Reigate and Redhill's two main catchments (Zones 1 and 2) was found to be relatively strong at between 52% and 57%, and Redhill and Reigate town centres were found to be the most popular destinations for these catchments. The towns were however found to compete with Croydon, Crawley and Bluewater.

3.23 Redhill town centre was also found to draw reasonable trade for comparison spend from the Caterham area in Tandridge. The comparison sales density (at £5,993/sqm) was found to be broadly in line with the benchmark of £6,000/sqm. The town centre was identified as having a poor choice in terms of A3/A5 and general leisure offer.

3.24 The Retail Needs Assessment found that Redhill town centre fared quite well in terms of convenience spend retention, with between 76% and 82% of spend within its two main catchment zones retained in the borough. Stores in both Redhill and Reigate town centres were found to exert relatively good influence on convenience spend within the two zones, in particular Sainsbury's in Redhill. Redhill town centre was found to have increased town centre retention from 45.4% in 2006 to 47.8% in 2016.

3.25 The Retail Needs Assessment identified a comparison retail need of 7,500sqm by 2027.Significant investment is planned in Redhill, both public and private, in development schemes within the town centre aimed at increasing the amount, choice and quality of comparison, convenience and leisure provision. The Retail Needs Assessment concluded that this investment is potentially sensitive to large edge or out-of-centre developments.

3.26 The Retail Needs Assessment concluded that Redhill is trading relatively well; however, the lack of variety and quality across convenience, comparison and leisure sectors means that the town centre is potentially vulnerable to growth in competing/ out-of-centre locations. The significant planned public and private investment in the town centre may be sensitive and vulnerable to large edge/ out-of-town retail developments, and policy should aim to prevent these where possible.

3.27 Since the Regulation 18 Development Management Plan town centre evidence paper was produced planning permission has been granted for the redevelopment of Marketfield Way. This is a mixed-use retail (4,498sqm), restaurant, leisure and residential development. At the time of preparing the Retail Needs Asessment, a screening application had been submitted to the Council – this was taken into consideration in the Retail Needs Assessment. The Retail Needs Assessment recognised that this development (along with other planned improvements) were vulnerable to large edge/ out-of-town retail developments.

Reigate

3.28 Reigate town centre was identified in the Retail Needs Assessment as catering for the mid-upper market in terms of its retail offer. Venuescore identifies the town as a major district centre and it is the second highest ranking of the borough's centres (at 435).

3.29 Due to the small unit stock and historic nature of the town, the Retail Needs Assessment identified that many units do not meet the requirements of modern retailers and there is a limited scope for expansion/ new development. Despite this, it was recognised that the town centre has historically had low vacancies and experiences good demand from retailers/ occupiers.

3.30 The Retail Needs Assessment identified Reigate as having a very strong trading performance in excess of £9,000/sqm in the comparison sector compared to the benchmark of £6,000/sqm. This was felt to reflect the particularly high quality nature of the comparison offer. As with Redhill, comparison spend retention in Reigate's two core catchments (Zones 1 and 2) was found to be reasonably strong at 52% to 57%. Reigate was found to be the most popular location in its 'home zone'. It was however found that Crawley exerts strong influence over comparison spending patterns in the Reigate catchment and that the town centre retains only 18% of clothing/ footwear spend within its home catchment.

3.31 As with Redhill, spend retention in the convenience sector in Reigate's two closest zones was found to be strong at between 76% and 82%. The town centre was found to have improved its retention of local spend from 42.6% in 2006 to 50.2% in 2016. This was found to be particularly driven by Morrisons, which was identified as overtrading.

3.32 Overall, Reigate was considered to have a comparatively strong trading performance in convenience and comparison sectors, have a broad range of A3/A5 food and drink operators and found to be comparatively less vulnerable than the other town centres as a retail destination given its high-end niche focus.

3.33 Since the Regulation 18 Development Management Plan town centre evidence paper was produced there have been no notable changes to the town centre's performance/ vulnerability. These comments are therefore felt to be an accurate representation of the town centre's performance/ vulnerability.

Review for Setting an Appropriate Threshold

The point at which lost trade is likely to begin to impact upon the viability of centres, using vacancy targets as a proxy

3.34 The Core Strategy Monitoring Framework[6] sets a vacancy target of 5% for town centres and 7% for local centres. Vacancy levels above this and – by interference – the level of trade being lost as a result is considered to be unhealthy and potentially detrimental to the viability of the centre.

3.35 The Regulation 18 Development Management Plan town centre evidence paper applied the 5/7% thresholds to town/ local centres to determine the potential size of edge/ out-of-centre store which might drawn an unhealthy or adverse level of trade from an existing centre.

[6] http://www.reigate-banstead.gov.uk/downloads/file/3073/adopted_core_strategy_july_2014

3.36 The table below shows that across town centres, the 5% vacancy target suggests that a loss of trading floorspace of more than 376sqm in the convenience sector and 563sqm in the comparison sector could begin to be harmful to the vitality and viability of the centre. By inference, a competing out-of-centre unit of a similar size could likewise be harmful to vitality.

3.37 For local centres, the analysis was and has been based on retail floorspace as a whole rather than broken down into comparison and convenience. The table below indicates that on average across all of the local centres, a loss of trading floorspace of 107sqm could begin to threaten the viability and vitality of the average local centre.

Table 3 Potential threshold using the vacancy target as a proxy

	Total Floorspace (sqm)	5/7% of Total Floorspace (sqm)	Average Floorspace per Centre (sqm)
Town Centres (4 Centres)			
Convenience	30,105	1,505	376
Comparison	45,024	2,251	563
Local Centres (18 Centres)			
Retail (A1-A5)	27,601	1,932	107

Average retail store sizes within existing centres

3.38 The Regulation 18 Development Management Plan town centre evidence paper then analysed the average size of retail units to provide an indication of the nature and scale of retail which currently exists in the borough's centres. This approach was used by Swindon Borough Council in preparing their recently adopted Local Plan[7] and therefore the principle of basing a threshold on average unit sizes has been endorsed through the examination process.

3.39 The table below shows that for town centres the average comparison store in the primary frontage is approximately 237sqm and convenience 691sqm.

Table 4 Average town centre store (all occupied primary frontage units)

	Comparison (sqm)	Convenience (sqm)
Banstead	103	399
Horley	211	666
Redhill	432	803
Reigate	139	1,218
All Town Centres	237	691

[7] https://www.swindon.gov.uk/info/20113/local_plan_and_planning_policy/635/swindon_borough_local_plan_2026

3.40 Excluding very large supermarkets/ superstores/ department stores (+1,000sqm), the average (mean) unit size in the convenience sector is 161sqm and comparison sector is 259sqm.

Table 5 Average town centre store (occupied primary frontage units less than 1,000sqm)

	Comparison (sqm)	Convenience (sqm)
Banstead	103	183
Horley	106	291
Redhill	255	324
Reigate	139	276
All Town Centres	161	259

3.41 The table below shows that the majority of the units within the borough's town centres are less than 1,000sqm. In the comparison sector 97.7% of the units are less than 1,000sqm and in the convenience sector 83.7% of the units are less than 1,000sqm.

Table 6 Typical unit size (occupied primary frontages)

Unit Size (sqm)	Comparison (%)					Convenience (%)				
	Banstead	Horley	Redhill	Reigate	All	Banstead	Horley	Redhill	Reigate	All
<100	79.5	63.0	18.6	35.9	41.3	65.0	33.3	38.5	60.0	37.2
100-249	17.9	29.6	35.6	55.1	39.0	15.0	8.3	15.4	0.0	14.0
250-499	2.6	0.0	30.5	7.7	12.2	10.0	25.0	15.4	10.0	18.6
500-749	0.0	3.7	10.2	1.3	5.2	5.0	8.3	0.0	10.0	7.0
750-999	0.0	0.0	0.0	0.0	0.0	0.0	8.3	15.4	0.0	7.0
1,000-2,499	0.0	0.0	1.7	0.0	0.6	0.0	8.3	7.7	10.0	7.0
2,500+	0.0	3.7	3.4	0.0	1.7	5.0	8.3	7.7	10.0	9.3

3.42 Local centres typically have smaller, more neighbourhood scale stores. In order to calculate the average size of a unit the local centres have been grouped. The table below shows that the average comparison unit is 90sqm and the average convenience unit is 100sqm. Both round to 100sqm.

Table 7 Average local centre store size

	Total (sqm)	Average Unit Size (sqm)	Rounded (sqm)
Comparison	6,404.0	88.9	100.0
Convenience	6,217.0	100.3	100.0

Retail development proposals and retailer models/ formats

3.43 The Regulation 18 Development Management Plan town centre paper undertook a reality check of retail developments proposed to ensure that the retail impact threshold reflects the reality of development proposals in the retail sector and the types of formats which retailers operate.

3.44 The table below details the recent planning permissions for convenience retail for both town and local centres. Excluding the large town centre and local centre regeneration permissions*, the planning permissions range from 28sqm to 528sqm with an average of 132sqm.

Table 8 Convenience planning permissions

Reference	Address	Net sales area (sqm)
11/01032/CLE	45 Nork Way, Nork	45
12/01852/F	Sainsbury's*, Redhill	1,894
13/00468/F	Henriettas News & Food, Slipshatch Road, Reigate	28
13/00848/F	Redhill Railway Station*	1,814
13/02117/F	Shelvers Hill Store, Tadworth	131
17/00460/F	Warwick Quadrant*, Redhill	626
14/02671/F	St Marcus Fine Foods, Lower Kingswood	41
14/00846/F	Former Liquid & Envy Nightclub*, Redhill	208
14/00801/F	Former Iron Horse Public House*, Merstham	260
16/01429/F	133 High Street, Banstead	60
16/01070/F	Morrisons, Reigate	86
12/02045/CU	41 Walton Street, Walton on the Hill	528
12/00596/F	Shell Garage, Brighton Road, Burgh Heath	68
14/02671/F	70 Brighton Road, Lower Kingswood	41
13/01148/CU	Trinity House, Reigate	286
14/01344/CU	Citygate Mini Dealership, Tadworth	140

3.45 In practice, convenience stores have market models ranging from a 200sqm net sales store (equivalent to small basket store such as Sainsbury's Local or Little Waitrose) through to a discounter of 1,000sqm (Lidl/ Aldi), a supermarket at 2,000sqm (Tesco, Sainsbury's, Morrisons) and a superstore/ megastore starting at 5,000sqm+ (Tesco Extra, Asda superstore).

3.46 Based on the current strength of the borough's centres, it is considered that even the smallest scale convenience stores (e.g. basket stores of 200-250sqm) could bring about a threat to vitality and viability. This is partially the case for the borough's small scale local centres which are fundamentally geared towards local convenience needs in terms of their offer and could therefore be disproportionately affected by out-of-centre proposals. Indeed, retail impact assessments have been sought and provided on a number of small scale out-of-centre convenience stores (e.g. 15/00041/CU[8]).

3.47 In the comparison sector, unit sizes and operator formats are generally more varied than in the convenience sector. However, in broad terms, new town centre retail units will typically fall within three main categories: large size units (1000sqm+), medium size units (500-1,000sqm) and small units (up to 500sqm). Conversely, out-of-town retail warehouse format comparison units typically range from 650-1,000sqm. Based on the nature of the borough's centres – and in particular the more limited availability of units over 250sqm in the comparison sector – it is considered that units approaching the upper end of the small units category could bring a threat to the vitality and viability, competing for modern/ national retailers which might otherwise locate within a town centre.

Recommendations

3.48 In line with the previous Regulation 18 Development Management Plan town centre evidence paper, it is felt that the national 2,500sqm threshold for retail impact assessments is too high when taking into account local circumstances.

3.49 The Regulation 18 Development Management Plan town centre evidence paper recommended:

- 150sqm for comparison retail
- 250sqm for convenience retail
- 2,500sqm (national threshold) for leisure and offices
- Where the end retail use is unclear or the operator/ retailer is unspecified, the impact assessment should be based on the lower of the two thresholds.

3.50 It is felt that this approach is still reasonable.

3.51 Using the Council's vacancy targets for town and local centres (5% and 7% respectively) as an indicator of the point at which lost trade and footfall may become harmful to vitality and viability, this suggests that:

- Proposals for 376sqm for comparison retail and 563sqm for convenience could affect town centres
- Proposals for 107sqm could affect local centres

[8] 15/00041/CU: Application for change of use from car showroom at ground floor and ancillary office at part of first floor to small Tesco Express store provided a retail impact assessment which demonstrated that the proposed store would not have a significant adverse impact on the vitality of the nearby Linkfield Road local centre. The application was however refused due to parking and pedestrian access and safety concerns.

Table 9 Vacancy rate as proxy

	Comparison (sqm)	Convenience (sqm)
Town centre	376	563
Local centre	107	

3.52 Using average existing retail units as a proxy – following the Swindon Local Plan example - would suggest a significantly lower threshold than the national threshold in the comparison sector (c.200sqm mid-point). For the convenience sector, excluding large supermarkets/ superstores, the average unit size suggests a threshold of around 260sqm. Local centre unit sizes are significantly smaller at an average of 100sqm.

Table 10 Typical unit size

	Comparison (sqm)	Convenience (sqm)
Town centre	161-237*	259-691*
Local centre	100	

*Upper end of range includes units over 1,000sqm

3.53 Based on an assessment of local retail planning applications and retailer formats, it is considered that even small format basket stores within the convenience sector could have a harmful impact on smaller local centres. Units of this type are typically around 250sqm of sales area. It is therefore felt appropriate to continue to recommend a convenience retail impact threshold of 250sqm.

3.54 In the comparison sector, the size and format of the units is more fluid. An assessment of local retail units shows that there is a limited availability of larger units. The average size of comparison units across the town centres is 161sqm. An assessment of local retail planning permissions shows that the average planning permission is approximately 132sqm. A comparison retail impact assessment threshold of 150sqm is therefore considered to be a reasonable recommendation.

3.55 It is therefore recommended that no changes are made to the recommended standards in the Regulation 18 Development Management Plan town centre evidence paper.

3.56 Where a retail impact assessment is required it should be prepared in line with national guidance.