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Planning. Design. Economics.

Land off Duke's Park, Woodbridge
Sequential Assessment

Gladman Developments Ltd

November 2015

14088/SB/JH

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1.0 Introduction

- 1.1 This Sequential Assessment has been prepared by Nathaniel Lichfield & Partners (NLP) on behalf of Gladman Developments Ltd to accompany an outline planning application to Suffolk Coastal District Council for a residential (up to 215 dwellings) scheme, including a small convenience store (400 sq.m gross / 280 sq.m net), on land off Duke's Park, Woodbridge, Suffolk.
- 1.2 This statement provides an assessment of the sequential approach to site selection in respect of the small convenience store element of the proposed development.
- 1.3 A retail impact assessment is not required to accompany the application for this small store.

2.0

The Application Site and Proposal

Application Site

2.1

The application site is located between Top Street / Ipswich Road (west/north), Duke's Park (north/east) and Sandy Lane (south/east), around 1.75km to the southwest of Woodbridge Town Centre. The 12.67 hectare site is irregular in shape and comprises an agricultural field, on the edge of Woodbridge's residential area. The nearest designated centre is Woodbridge Town Centre itself.

2.2

The site of the proposed convenience store is at the most northerly point of the application site, adjacent to Ipswich Road (B1438) (see The Framework Plan submitted with the planning application). The Framework Plan also indicates that there will be vehicular accesses from Top Street, Sandy Lane and Ipswich Road (adjacent to the convenience store location).

Surrounding Area

2.3

The surrounding area is mixed in character given the application site's location immediately adjacent to Woodbridge's built-up settlement. To the north and east of the site are primarily residential areas, typified by tree lined suburban road layouts, semi-detached/detached housing and areas of open space. To the west is the A12 and Seckford Golf Club beyond, with Bridge Farm & Business Centre and a small cluster of residential units to the southwest. The Ipswich to Lowestoft railway runs perpendicular to the site's southern boundary (East Suffolk Line), with a number of light industrial units and sewerage works beyond.

2.4

Woodbridge Town Centre is the nearest defined centre to the application site (1.75km to the northeast) and is one of five town centres in Suffolk Coastal District, the highest order centres in the District. The town centre primarily serves Woodbridge's immediate catchment and surrounding villages, as well as providing facilities for visitors and passers-by. The centre contains a number of national multiple retailers, as well as a number of independent retailers. Both Old Barrack Road and Hasketon Road, within Woodbridge's urban area, contain small neighbourhood convenience stores.

The Proposed Development

2.5

The applicant, Gladman Developments Ltd, is seeking outline planning permission for a residential scheme, including a small convenience store (400 sq.m gross / 280 sq.m net) on land off Duke's Park, Woodbridge, Suffolk.

2.6

In this context, the 1994 Sunday Trading Act defines a small shop as having a net sales area of 280 sq.m and below. As such, Government legislation would allow this store to trade as a 'small' shop.

- 2.7 The convenience store element of the scheme is to be a small neighbourhood facility, much like those on Old Barrack Road and Hasketon Road, to enhance the sustainability credentials of the overarching scheme by providing future residents with a facility for day-to-day top-up shopping and convenience purchases, primarily by walking or cycling.
- 2.8 The store is also intended to serve existing adjoining residential areas, again primarily by walking or cycling. As such, this type of store has specific locational requirements, to be within a localised residential area or small defined centres (if available), sited within the proposed and/or existing residential neighbourhood (for example southwest Woodbridge), and ideally in a prominent and accessible location at the juxtaposition of those areas. That is what is proposed.

Summary

- 2.9 The outline application proposes a residential scheme, including a small convenience store (400 sq.m gross / 280 sq.m net) on land off Duke's Park, to the south west of Woodbridge. The convenience store element is sought to enhance the sustainability credentials of the overall scheme and will serve future new residents and existing adjoining residential areas. On this basis, the store has specific locational requirements.

3.0

Relevant Planning Policy

3.1

This section identifies key town centre and retail planning policy and guidance at a national and local level, in the context of the Council's requirement that the sequential test is applied to the proposed convenience store development. It also considers relevant case law which should be read in the context of the sequential test for main town centre uses.

3.2

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and para.150 of the National Planning Policy Framework (NPPF, 2012) state that planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise.

National Policy & Guidance

National Planning Policy Framework

3.3

Relevant national planning policy is found within the NPPF.

3.4

The NPPF sets out the overarching policy priorities for the planning system, against which Local Plans will be prepared and decisions made on planning applications.

3.5

At the heart of the NPPF is a presumption in favour of sustainable development, which should be the golden thread running through both plan-making and decision-taking. In terms of decision making, the NPPF states (para. 14) that this means (unless material considerations indicate otherwise):

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

3.6

Two of the key elements for delivering sustainable development are building a strong, competitive economy and ensuring the vitality of town centres. Para. 18 states that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and meeting the twin challenges of global competition and of a low carbon future.

3.7

For retail development, the NPPF (para. 24) states:

“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. They 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. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.”

- 3.8 NPPF (para. 26) states that applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, and if there is no locally set threshold, the default threshold is 2,500 sq.m (gross).
- 3.9 Where an application fails to satisfy the sequential test (or is likely to result in significant adverse impact from a retail perspective), it should be refused (NPPF para 27).

Planning Practice Guidance

- 3.10 The Planning Practice Guidance (PPG), an online “living” source of planning guidance was published on 6 March 2014. On retail and the sequential approach to site selection for main town centre uses, the PPG provides a checklist:
- “The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:*
- *with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.*
 - *is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
 - *if there are no suitable sequentially preferable locations, the sequential test is passed.”*
- 3.11 In terms of “**locational requirements**” when considering the application of the sequential test, the PPG goes on to state:

“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.”

- 3.12 This is a material consideration in the determination of this application.

Planning Decisions & Legal Interpretation

- 3.13 The Courts have provided clarification on the application of the sequential approach and the need for applicants to demonstrate flexibility. These judgements provide important legal precedents that apply to the interpretation of the NPPF and their degree of consistency with the recently published PPG.
- 3.14 The Supreme Court's ruling in the case of Tesco Stores Ltd v Dundee City Council (2012) established that 'suitability' is very much related to the applicant's or retail occupier's own requirements. Para. 29 of the Judgement (Lord Reed) states that a key question is *“whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site”*.
- 3.15 This principle has now been established in English law in the Administrative Court judgement in the case of R (on the application of Zurich Assurance Ltd T/A Threadneedle Property Investment v North Lincolnshire Council [2012]).
- 3.16 Confirmation of how the Secretary of State intends the NPPF retail sequential test to be applied in the light of these Court decisions and the PPG is evident from his endorsement of the Inspector's recommendation to approve a hybrid application for a mixed retail and leisure scheme at Northampton Road, Rushden (Appeal ref. APP/G2815/V/12/2190175, SoS Decision Letter 11 June 2014).
- 3.17 The wording of NPPF (para. 24) means that the sequential test should be applied to the proposal (i.e. the application), rather than requiring consideration of whether the needs can be met in a different way in sequentially preferable locations. This approach is consistent with that applied in the Rushden decision, which states (para. 8.46):
- “It is important to bear in mind that the sequential test as set out in NPPF [24] require applications for main town centre uses to be located in town centres and it then runs through the sequence, edge and then out-of-centre. This makes good the very simple point that what the sequential test seeks is to see whether the application i.e. what is proposed, can be accommodated on a town centre site. There is no suggestion here that the sequential test means to refer to anything other than the application proposal.”*
- 3.18 The Rushden decision is also of relevance in terms of when a site is 'available' in the context of the sequential test. The Inspector stated:

"In terms of availability, NPPF [24] simply asks whether town centre or edge of centre sites are "available". It does not ask whether such sites are likely to become available during the remainder of the plan period or over a period of some years ... The site was not currently available and that was what was required by the sequential test." (para. 8.55)

- 3.19 When considering a sequential site's availability, it is therefore necessary to have regard to the likely timetable for the completion of the application proposal. Sites should be capable of being delivered in a shorter period, or similar time period when compared with the application proposals.

Development Plan Policy

- 3.20 The Suffolk Coastal Core Strategy and Development Management Policies DPD (July 2013) and saved policies of the Suffolk Coastal Local Plan (as saved July 2013) is the development plan for the purpose of this application.

Suffolk Coastal Core Strategy and Development Management Policies DPD

- 3.21 The main sustainability objectives and retail policies applicable to this proposal are as follows:

- 3.22 Objective 1 – Sustainability states:

"To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development."

- 3.23 Strategic Policy SP9 – Retail Centres states:

"Emphasis within the district will be on maintaining and enhancing the viability and vitality of existing retail centres, and making proper provision for new forms of retail distribution..."

- 3.24 Policy SP9 identifies Woodbridge as a Town Centre, but does not specifically reference any sequential approach to site selection – therefore, NPPF Para. 24 applies. The accompanying text to Policy SP9 goes on to state:

"No need has been proven requiring a new retail centre to be provided. However, district/local centre provision will be required to serve new housing development and where appropriate to support new business provision" (para. 3.102)

- 3.25 Policy SP9 identifies Martlesham Heath as a District Centre. Martlesham Village is not an identified Retail Centre, although it is designated as a Key Service Centre in the Settlement Hierarchy classification.

Table 3.7 (Town Centre Floorspace Capacity – Projections from Retail Study) identifies capacity for 840 sq.m net convenience floorspace in Woodbridge by 2025.Suffolk Coastal Local Plan

- 3.26 Saved Policy AP56 – Town Centres, identifies Woodbridge as a defined town centre. The policy goes on to outline a number of uses for which town centres are the preferred location, unless there are other overriding material considerations, or if proposals are in accordance with other policies in the Local Plan.

Emerging Site Allocations and Area Specific Policies DPD

- 3.27 The Suffolk Coastal Site Allocations and Area Specific Policies DPD Preferred Options Consultation Document was issued for consultation in October 2015. This DPD does not contain any specific policies relating to Woodbridge or Martlesham as these will be contained within the respective Neighbourhood Plans. The preparation of these Neighbourhood Plans are an early stage. An earlier Issues & Options consultation was undertaken between December 2008 and February 2009 which included the application site (ref. 453), having been put forward for residential and recreational use.
- 3.28 A “Retail Capacity Refresh” report was produced by Carter Jonas in October 2015 to inform the emerging Site Allocations and Area Specific Policies DPD, to ensure that the necessary sites and development opportunities are provided to meet the identified needs for new retail floorspace.
- 3.29 The Refresh Study concludes that there is no forecast capacity in Suffolk District as a whole for additional convenience goods floorspace until 2031. However, this takes into account retail commitments, including a food store at Railway Approach, Felixstowe, which it acknowledges is unlikely to be started within the three years of its existing consent. Further, although there is limited “global” capacity in the District, Table 3.3 identifies convenience goods capacity elsewhere in the District, including 233 sq.m net at Woodbridge and 1,896 sq.m net within the Ipswich Eastern Fringe area that includes the application site (see Appendix 1).
- 3.30 The Retail Capacity Refresh shows that there is a high proportion of convenience goods expenditure outflow from Woodbridge town centre to stores elsewhere, including the Tesco Extra at Martlesham Heath (Table 1, Appendix 3).
- 3.31 The Refresh Study makes recommendations for a locally set impact threshold, and suggests that proposed developments for convenience or comparison goods retailing of 400 sq.m gross or more should be required to demonstrate that they will not have a significant adverse impact on the District’s network of centres. Notwithstanding that the Refresh Study was produced to inform the Preferred Options consultation document, this recommendation has not been included within the emerging Site Allocations and Area Specific Policies DPD.

Summary

- 3.32 The NPPF sequential test (para. 24) is the overriding policy consideration for the convenience store proposal, supplemented by the relevant guidance in the PPG, in particular reference to specific locational requirements when considering the application of the sequential test.
- 3.33 Furthermore, Objective 1 of the adopted Core Strategy and Development Management Policies DPD is relevant, whilst the accompanying text to Policy SP9 at 3.102 is a material consideration.
- 3.34 As there is no locally set threshold for requiring a retail impact assessment within either the adopted or emerging development plan documents, the NPPF threshold of 2,500 sq.m remains applicable, and a retail impact assessment is not required for this small scale convenience store.
- 3.35 Neighbourhood Plans for Woodbridge and Martlesham will include site specific policies, however as the preparation of these plans is at an early stage, the planning application needs to be assessed against the NPPF and adopted development plan policy documents.

4.0

Store Catchment & Retail Provision

Neighbourhood Store Catchment

- 4.1 The proposed convenience store has a maximum gross floorspace of 400 sq.m (280 sq.m net). It will operate as a neighbourhood store meeting the day to day shopping needs of local residents, and would primarily have a walk-in catchment area. A development of this size would draw the majority of its trade from a radius of broadly up to 600 metres, given the existing competition, and this has therefore been adopted as the catchment area.
- 4.2 The catchment area of the convenience store proposal is southwest Woodbridge. However, we examine the provision across a wider Woodbridge & Martlesham study area to place this catchment in its retail centre context.

Existing Convenience Stores

- 4.3 There are no designated retail centres (i.e. Town Centre, Key Service Centre or Local Service Centre) within the 600 metre catchment area (see Appendix 1 – Key Diagram).
- 4.4 There was no convenience provision identified within the 600 metre catchment area during a site visit.
- 4.5 The following existing convenience store provision within Woodbridge falls outside the neighbourhood store catchment area (see Appendix 2 – Existing Convenience Provision in Woodbridge and Martlesham):
- 1 Co-op Food store (134 sq.m net sales**), Hasketon Road, Woodbridge
 - 2 Co-op Food store (94 sq.m net sales**), Old Barrack Road, Woodbridge
 - 3 Budgens (722 sq.m net sales**), Hamblin Road, Woodbridge town centre
 - 4 Co-op Food store (304 sq.m net sales**), Thoroughfare, Woodbridge town centre
 - 5 Spar (115 sq.m net sales*), Thoroughfare, Woodbridge Town Centre
- 4.6 Additionally, on the opposite side of the railway line to the south, and outside any defined Retail Centre, lie the:
- 6 Post Office Stores (60 sq.m net sales*), Blacktiles Lane, Martlesham Village
 - 7 Tesco Extra (5,905 sq.m net sales**), Martlesham Heath
 - 8 M&S Simply Food (517 sq.m net sales**), Beardmore Park, Martlesham Heath

Sources: *VOA, **ORC Store Point Food

Quantitative and Qualitative Need

- 4.7 CBRE prepared the Retail Study on behalf of Suffolk Coastal District Council in 2003. This Study was subsequently updated in December 2008 and in September 2009.
- 4.8 In terms of additional convenience floorspace in Woodbridge, the 2009 Update identifies 840sq.m (net) capacity in the period up to 2025. This quantitative conclusion is repeated in Table 3.7 of the Core Strategy and Development Management Policies DPD. The proposed neighbourhood store would absorb 280 sq.m (net) capacity for convenience floorspace in Woodbridge, or 33% of this available capacity.
- 4.9 As identified in the previous section, the "Retail Capacity Refresh" report (October 2015) identifies convenience goods capacity for 233 sq.m net at Woodbridge and 1,896 sq.m net within the Ipswich Eastern Fringe area that includes the application site (see Appendix 1). This suggests that there is sufficient capacity to support a small convenience store within Woodbridge and the Ipswich Eastern Fringe.
- 4.10 The proposed neighbourhood store (280 sq.m (net)) approximately equates to the capacity for convenience floorspace in Woodbridge, and would absorb around 15% of the available capacity within the Ipswich Eastern Fringe.
- 4.11 The absence of any convenience floorspace within the southwest Woodbridge residential area highlights a gap in neighbourhood store provision and potential for qualitative and quantitative improvements.
- 4.12 The proposed store would sit comfortably within the existing settlement shopping pattern, given the comparable Co-op neighbourhood convenience stores in out-of-centre locations at Old Barrack Road and Hasketon Road, and would provide a conveniently located and easily accessible modern facility that will serve the proposed development subject of this application and existing local population by enabling predominately "top-up" food shopping.

Summary

- 4.13 The catchment area of the proposed convenience store is southwest Woodbridge, within which there is no existing provision. There is identified capacity for additional convenience floorspace in Woodbridge and the Ipswich Eastern Fringe, and a qualitative need for easily accessible neighbourhood store provision within the proposed new housing on land off Duke's Park and adjoining residential areas.
- 4.14 The proposed convenience store is similar in size to the existing Co-op in Woodbridge town centre but would perform a very different role.
- 4.15 There are two existing small convenience stores (in out of centre locations) that serve as "top-up" convenience operations in other residential areas within Woodbridge Town, some 900 m and 1.4 km distance from the proposal site. These stores each have a net sales area of less than half the size of the

proposed development, and serve a localised catchment. This existing provision demonstrates the acceptability of such operations within the settlement pattern and centre hierarchy for Suffolk Coastal District.

5.0 Sequential Approach

- 5.1 The sequential approach to assessing whether there are suitable and available options for a proposed development within or on the edge of a centre must start with the role of the proposal and the catchment it is intended to serve.
- 5.2 In this case, the convenience store proposed is 'wholly specific' to the application site, as it is intended to act as a neighbourhood convenience store for residents of the new housing development and existing residential areas adjoining in southwest Woodbridge.

Flexibility

- 5.3 There is limited opportunity for flexibility in store format and scale as the neighbourhood store format directly relates to the rationale behind its location in a new residential neighbourhood setting.
- 5.4 The indicative format of the proposed convenience store presents a specific site search parameter. In seeking to demonstrate flexibility, the format of the development cannot be altered greatly, whilst scale is also invariably linked to this type of convenience retailing. The retail scale has been limited to that which can function as a 'small store' enabling less restrictive Sunday trading.
- 5.5 Nonetheless, for further robustness, we have also demonstrated flexibility using wider site search parameters (see Section 6).

Location & Sustainability

- 5.6 The sustainable characteristics of the proposed convenience store, to serve a localised neighbourhood catchment, means it is not a facility that can or should be readily provided within a town centre location.
- 5.7 By its nature, the convenience store is a facility that needs to be appropriately located for its immediate residential neighbourhood catchment, in line with its "*locational specific*" requirements. There is no sequential rationale for seeking to provide additional convenience store representation in the town centre as it would not meet the location specific need generated by the new residential development. A site in a town centre, where main town centre uses tend to serve a much larger catchment area and meet the need and range of consumer requirements, in addition to serving its immediate residential neighbourhood, is therefore a counter-intuitive location for the type of neighbourhood convenience store proposed.
- 5.8 The qualitative 'need' for a neighbourhood convenience store to serve the proposed development and adjoining residential areas within south west Woodbridge is also supported by the scope, in quantitative capacity, for additional convenience floorspace.

- 5.9 As indicated on the proposed Framework Plan submitted with the application, the convenience store will be located at the northern extent of the application site, adjacent to Ipswich Road. The rationale for this location is to utilise an accessible location on the edge of the application site so the new neighbourhood convenience store can serve the new residential development, the existing adjoining residential areas, and an element of local pass-by traffic.
- 5.10 There are clear sustainability and environmental benefits of the proposed neighbourhood convenience store. The location of the store will encourage walking and cycling, and in tandem reduce the dependence on private car for top-up shopping trips. The store will reduce the need to travel elsewhere in Woodbridge and Martlesham for existing and new top-up shopping trips. The majority of vehicle visits to the neighbourhood store are expected to be existing local residents in south west Woodbridge undertaking a top-up shopping trip when travelling to / from home – i.e. such trips would already be on the highway network.
- 5.11 Locating the store anywhere other than within the application site would not achieve the benefits associated with the proposed development.
- 5.12 It is important to note that Objective 1 of the adopted Core Strategy and Development Management Policies DPD seeks to deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development. Provision of a neighbourhood convenience store in this location will contribute to this objective.

Summary

- 5.13 There are locational specific reasons why the proposed convenience store should be located in the new residential expansion area of south west Woodbridge. A location within Woodbridge Town Centre would be unsuitable for the role of the neighbourhood store proposed.
- 5.14 Furthermore, there are clear sustainability benefits in siting the store as proposed, as this would encourage sustainable patterns of land use and travel, thereby reducing the need to travel further for small “top-up” food shopping trips.

6.0

Sequential Site Assessment

Area of Search

6.1

The likely catchment of the proposed convenience store comprises a typical 600 metre radius, i.e. within easy walking or cycling distance. There are no defined Retail Centres within this area, Woodbridge Town Centre being the nearest at 1.75 km from the application site, followed by Martlesham Heath some 3.5 km distance from the site (see Appendix 2).

6.2

Notwithstanding the above shortfalls of a sequential site search, given the business model and “locational specific” requirements specified in the PPG, we have conducted a search to see if there are any sites that are situated in or on the edge of the nearest designated Centre i.e. Woodbridge Town Centre which could accommodate the proposed convenience store.

6.3

It would not be appropriate to sequentially search for options within Martlesham Heath, as not only is this District Centre well outside the proposed neighbourhood store’s catchment, it is a separate settlement from Woodbridge.

6.4

Martlesham village lies closer to the site (1.7km distance), between Woodbridge and Martlesham Heath, separated from Woodbridge by the railway line. As well as lying outside the proposal’s catchment, Martlesham is a separate village settlement, and is not a designated retail centre in the retail hierarchy in any event.

6.5

In terms of the sequential sites assessed, there are no relevant potential development sites highlighted within the CBRE Retail Study. We have therefore inspected Woodbridge town centre (in November 2015) to identify and consider whether there are any sites or properties within or on the edge of Woodbridge town centre.

Search Criteria

6.6

Our sequential search criteria reflect typical neighbourhood convenience store format requirements. They are as follows:

- A vacant unit that can accommodate a store of 400 sq.m gross / 280 sq.m net, or a developable site of 0.1 ha in line with the Development Framework;
- Road frontage with good access and visibility;
- Manoeuvring space on site to enable provision of servicing and customer vehicle circulation; and
- Approximately 10 on-site car parking bays and a similar maximum for cycle parking.

- 6.7 Sites that do not fall within the above parameters have been discounted. For the purpose of this sequential assessment, and in the context of informing the above parameters, we have analysed comparable operations at Co-op stores on Old Barrack Road and Hasketon Road at out-of-centre locations in Woodbridge.
- 6.8 Woodbridge Town Centre and its immediate environs were inspected for potential development sites.
- 6.9 In Woodbridge, a potential sequential site identified is the boarded up, cleared site to the rear of the Budgens store (see photos 1 and 2 below and Appendix 3 – Woodbridge Town Centre Sequential Sites Map). This site is part of a much wider allocation for future retail expansion to the rear of the Turban Centre (saved Local Plan policy AP255). The wider site allocation measures approximately 8,600 sq.m and is allocated for further convenience retail floorspace. The site is currently operating as a Council owned car park, much of which is located outside the defined town centre, plus the existing Budgens and the adjacent cleared site. The supporting text to the policy (saved Policy APP255) makes clear that the area of public car parking should be retained for this purpose. There have been long term development proposals (dating back to 1999) for a store extension. Most recently this aspiration was reflected in both the grant of planning permission by SCDC in April 2008 for an extension of 430 sq.m to the Budgens store and erection of five dwellings (LPA ref: C/07/1794); and the provision of a mezzanine floor within the unit (LPA ref. C09/0633, granted 10 June 2009). On 12 March 2012, an application to extend the time limit for the implementation of planning permission ref. C09/0633 was approved.
- 6.10 The small, cleared site adjacent to Budgens would not be suitable for development in isolation, and suffers from a lack of visibility from Thoroughfare. Although the site is suitable for retail purposes, the development of a small neighbourhood convenience store on part of the site would not meet the wider aspirations for the redevelopment of this site. This site is therefore not considered to be suitable for the proposed development.
- 6.11 Vacant units in Woodbridge town centre were also identified and assessed. There is a low number of vacant units within Woodbridge, the majority of which are small (less than 100 sq.m gross). For this assessment, we have only considered units that have an area of 150 sq.m gross or more, which is less than half of the size of the proposed convenience store.
- 6.12 Two potentially sequentially preferable vacant units have been identified (see Appendix 3 – Woodbridge Town Centre Sequential Sites Map). These units and their respective characteristics are analysed below.

Vacant Units

Unit	Size (sq.m)	Characteristics	Parking & Servicing	Other	Suitable?
13 Church Street (see photo 3 below)	300	<p>Dilapidated 2 storey Listed Building. Situated on secondary retail street, away from core shopping offer. Unlikely to be suitable for modern convenience formats due to terraced frontage, levels, small size, limited shop front space and difficult servicing solution.</p> <p>Permission granted for change of use from shop to residential use (ref. C/12/0526), currently under alteration.</p>	No on-street parking, public car park nearby. Limited servicing space.	Grade II Listed	No
55 Thoroughfare (see photo 4 below)	180	Listed terrace building, situated on main retail street. Two small glazed shopfronts in single frontage. Small 102.5 sq.m ground floor (VOA, 2010), prohibitive for modern convenience store format.	No on-street parking, public car park nearby. Potential rear servicing access.	Grade II Listed	No

Size Sources: GOAD (updated by NLP, November 2015)

Photo 1: Site to rear of Budgens



Photo 2: 13 Church Street



Photo 3: 13 Church Street



Photo 4: 55 Thoroughfare



Summary

- 6.13 The sequential approach to assessing this convenience store proposal does not necessitate searching for any sites or existing retail units in Woodbridge town centre or Martlesham Heath District Centre (or in Martlesham village which has no defined retail centre status), as these lie outside the catchment area for this proposed neighbourhood convenience store, one which needs to be located on the application site to serve an expanded south west Woodbridge.
- 6.14 We have nonetheless undertaken a sequential site assessment to establish whether or not there are any sequentially preferable in or edge of centre options in Woodbridge town centre, without prejudice to the above conclusion.
- 6.15 Our assessment identified that there are no sequentially preferable sites available within or on the edge of Woodbridge town centre, that are suitable for the proposed convenience store in any event. Furthermore, none of the identified vacant units are suitable for the proposed neighbourhood convenience store.
- 6.16 Thus, the convenience store proposal satisfies the sequential test, even if it were appropriate (which it is not), to assess potential alternatives within Woodbridge town centre.

Conclusions

7.0

7.1

This Sequential Assessment has been prepared on behalf of Gladman Developments Ltd to accompany an outline planning application to Suffolk Coastal District Council for a residential (up to 215 dwellings) scheme, including a small new convenience store, on land off Duke's Park, to the southwest of Woodbridge.

7.2

The proposed neighbourhood convenience store has a floorspace of 400 sq.m gross / 280 sq.m net. Its role is to provide a facility to satisfy the needs of residents of the local area, i.e. the proposed residential development and the existing adjacent, residential area, in south west Woodbridge.

7.3

The NPPF sequential test (Para. 24) is the overriding policy consideration for the convenience store proposal, supplemented by the relevant guidance in the PPG. The PPG recognises that, in some cases, specific locational requirements dictate the need for main town centre uses outside of defined centres. This neighbourhood store is one example of such a locational requirement. The new store will improve the convenience offer to local residents, in addition to the new residents at the proposed site, and have other sustainability benefits in terms of reducing car journeys, whilst also contributing to the overall need for additional convenience floorspace in Woodbridge.

7.4

The sequential approach to assessing this convenience store proposal does not necessitate searching for any sites or existing retail units in Woodbridge town centre or Martlesham Heath District Centre (or in Martlesham village which has no Retail Centre), as these lie outside the typical 600m catchment area for this proposed neighbourhood convenience store, one which needs to be located as proposed to serve an expanded south west Woodbridge.

7.5

We have nonetheless undertaken a sequential site assessment to establish whether or not there are any sequentially preferable in or edge of centre options in Woodbridge town centre, without prejudice to the above conclusion.

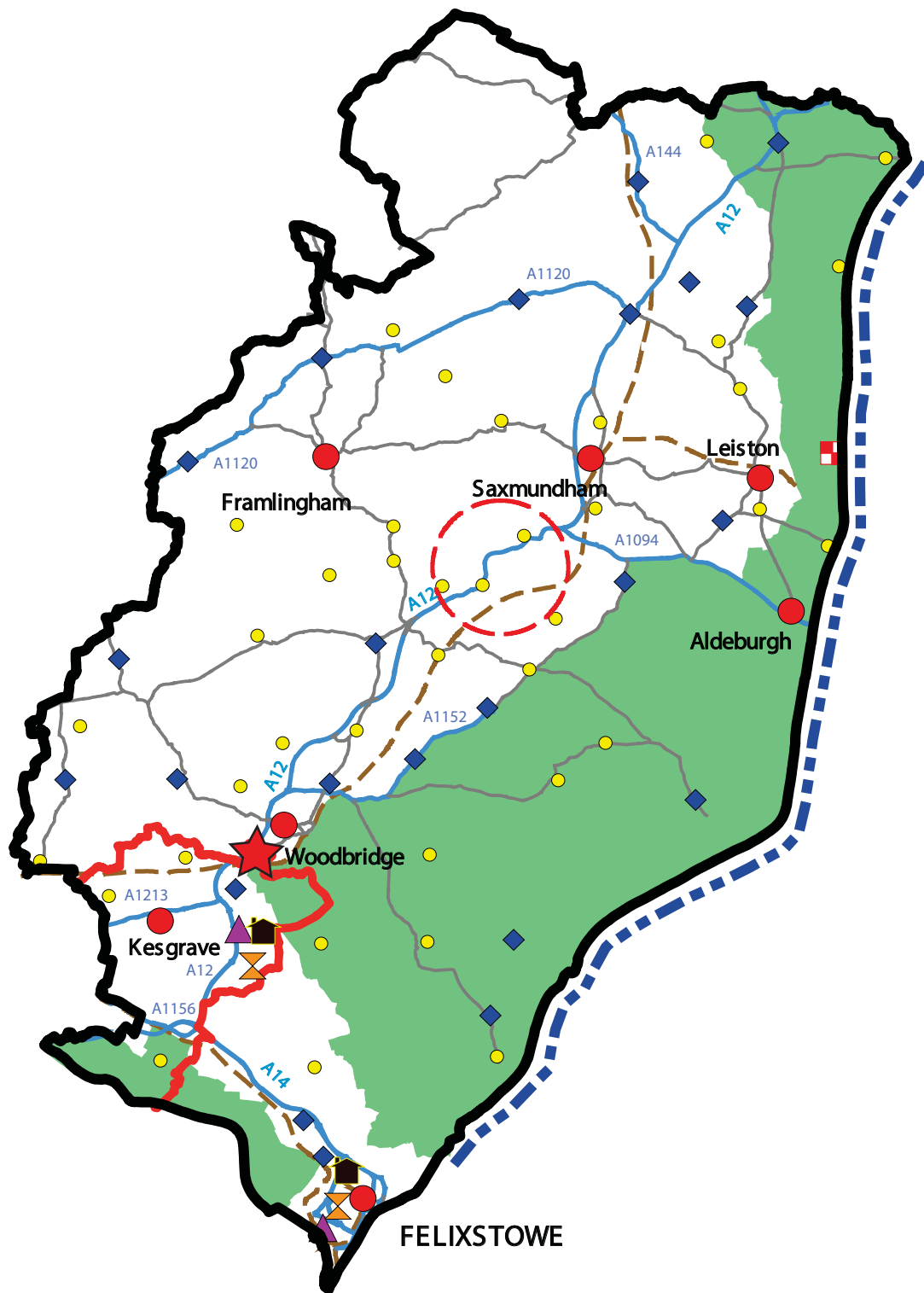
7.6

We find that there are no sequentially preferable sites available within or on the edge of Woodbridge town centre that are suitable for the proposed convenience store in any event. Furthermore, there are no vacant units that would be suitable for the proposed neighbourhood convenience store.

7.7

Thus, the convenience store proposal satisfies the NPPF sequential test, even if it were appropriate (which it is not), to assess potential alternatives within Woodbridge town centre. Furthermore, this element of retail development will support new housing development (as advocated by the supporting text to Policy SP9 para. 3.102, albeit in the form of a neighbourhood store rather than a new district/local centre) and contribute to securing better integrated and sustainable patterns of land use (as encouraged in Core Strategy and DM Policies DPD Objective 1).

Appendix 1 Core Strategy and DM Policies Key Diagram



KEY

Application Site



Eastern Ipswich Plan Area



Towns



Key Service Centres



Local Service Centres



Strategic employment area



Strategic housing area



Proposed Area Action Plan



Sizewell Nuclear Power Station



Potential 4 villages A12 bypass



A roads



B roads



Railways



Heritage Coast



AONB



District Boundary



Nathaniel Lichfield
& Partners
Planning, Design, Economics.

Project Dukes Park

Title **Suffolk Coastal District Local
Plan Core Strategy and DM
Policies Key Diagram**

Client Gladman Developments Ltd

Date November 2015

Scale NTS

Drawn by LA

Drg. No IL14088/005

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Appendix 2 Existing Convenience Provision in Woodbridge and Martlesham



KEY

Existing Convenience Provision

1. CO-OP, Hasketon Road

134sqm net sales

2. CO-OP, Old Barrack Road

94sqm net sales

3. Budgens, Hamblin Road, WTC

722sqm net sales

4. CO-OP, Thoroughfare, WTC

304sqm net sales

5. SPAR, Thoroughfare, WTC

115sqm net sales

6. Post Office Stores, Blacktiles Lane, Martlesham Village

60sqm net sales

7. Tesco, Martlesham Heath Retail Park, Beardmore Park

5905sqm net sales

8. M&S Simply Food, Martlesham Heath Retail Park, Beardmore Park

517sqm net sales

Proposed Convenience Provision

9. Proposed neighbourhood Convenience Store

280sqm net sales

600m radius

Woodbridge Town Centre inset and enlargement

nlp

Nathaniel Lichfield & Partners

Planning, Design, Economics.

Project

Land off Duke's Park, Woodbridge

Title

Existing Convenience Provision in Woodbridge and Martlesham

Client

Gladman Developments Ltd

Date

November 2015

Scale

NTS

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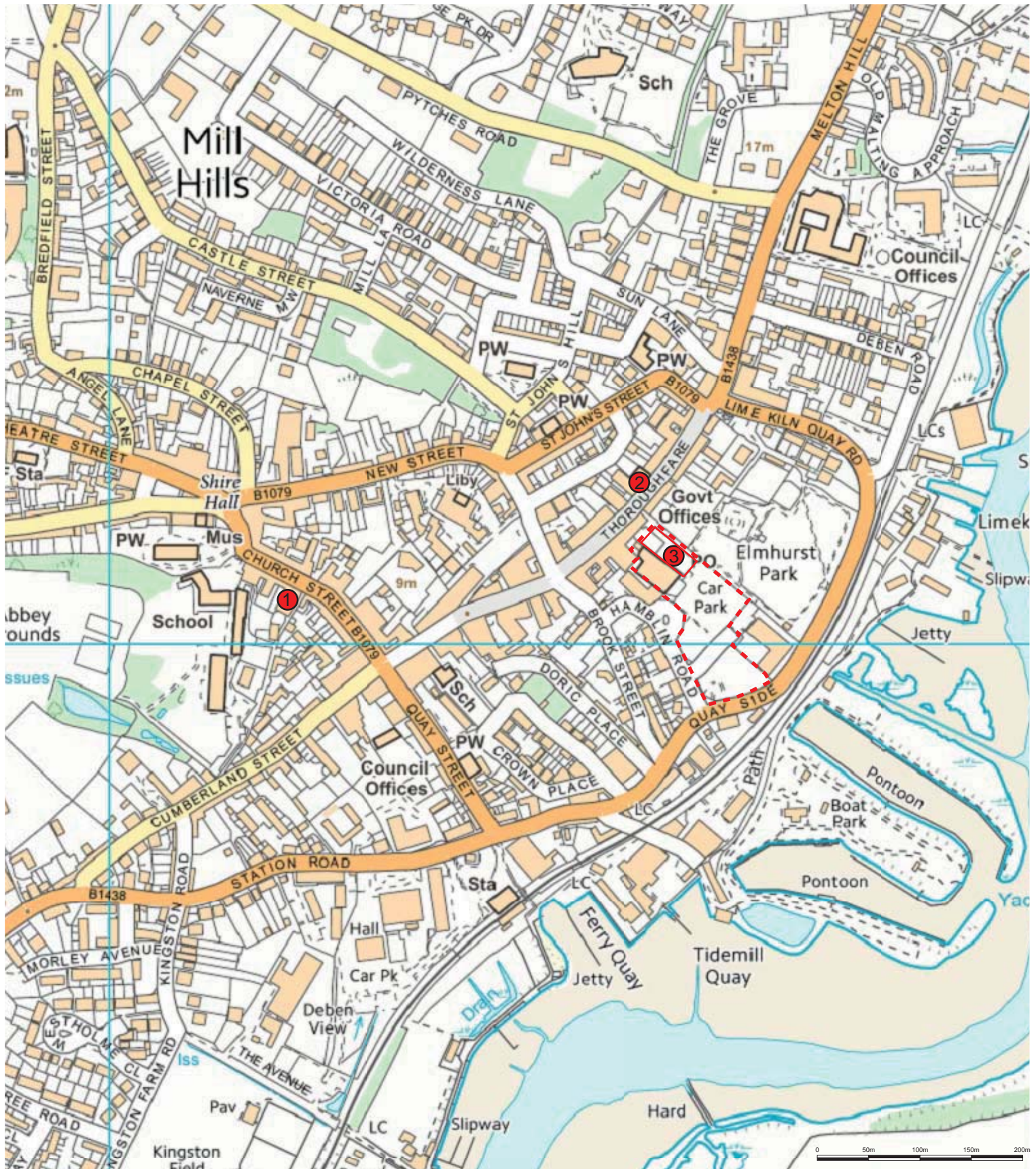
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Appendix 3 Woodbridge Town Centre Sequential Sites Map



KEY

Sequential Sites

1. 13 Church Street (300sqm)
2. 55 Thoroughfare (180sqm)
3. Rear of Budgens



Turban Centre (AP255)



**Nathaniel Lichfield
& Partners**
Planning, Design, Economics.

Project Land off Duke's Park, Woodbridge

Title **Woodbridge Town Centre
Sequential Sites Map**

Client Gladman Developments Ltd

Date November 2015

Scale 1:5000 @ A4

Drawn by LA

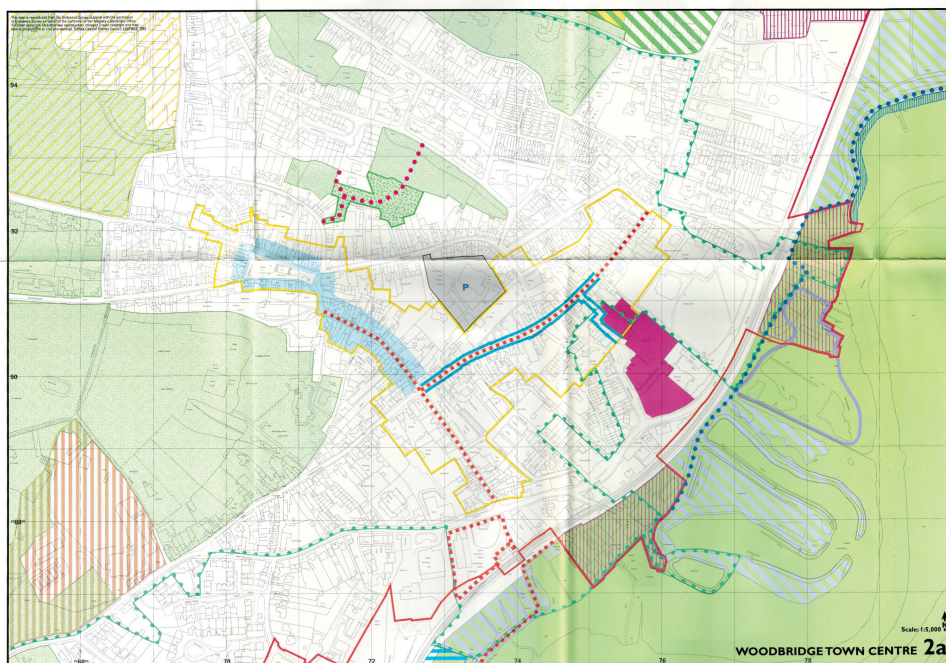
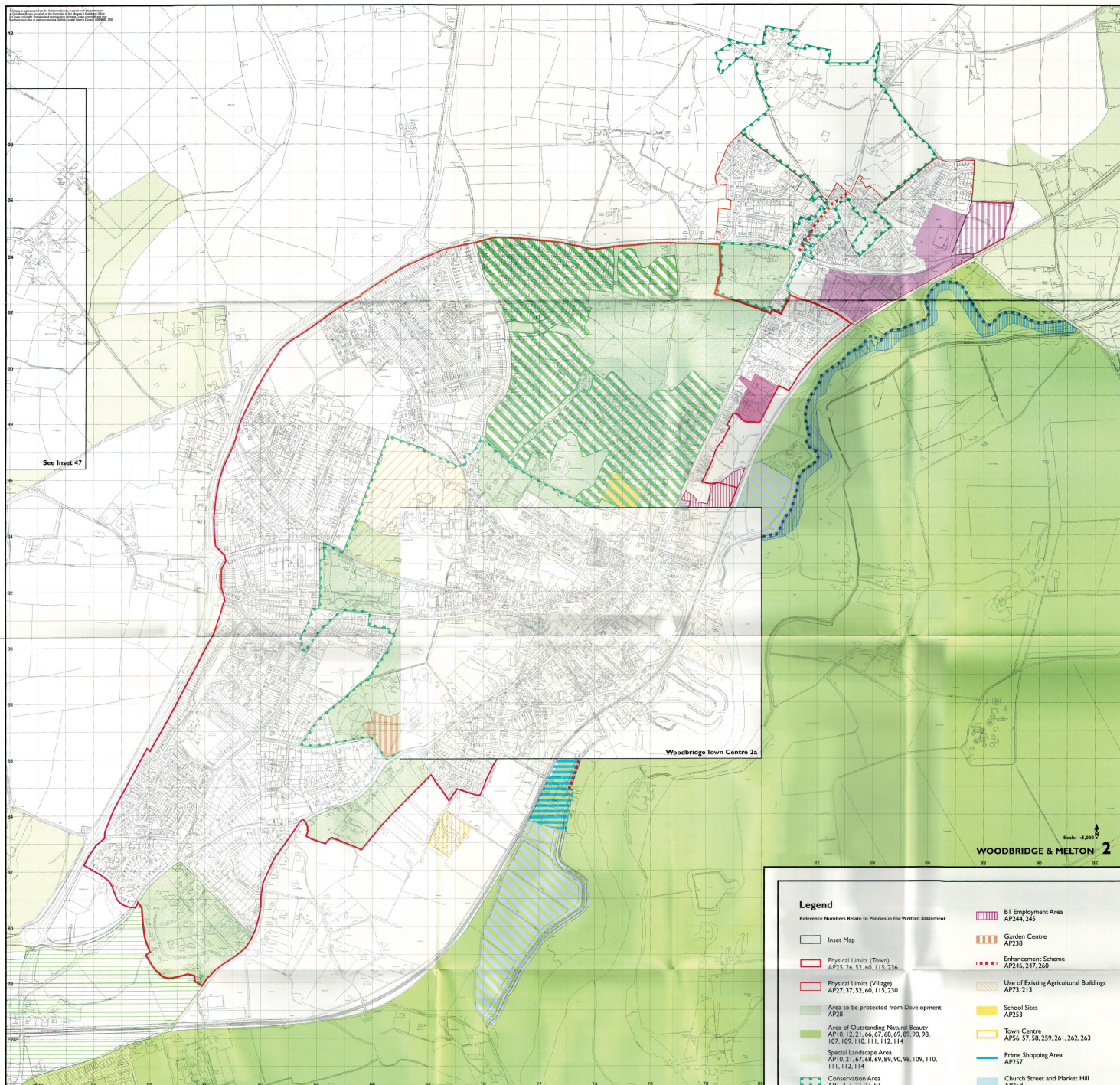
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Appendix 4 Suffolk Coastal Local Plan Inset



Legend

Reference Numbers Relate to Policies in the Written Statements

- Inset Map
- Physical Limits (Town)
AP23, 26, 52, 60, 115, 236
- Physical Limits (Village)
AP27, 37, 52, 60, 115, 230
- Area to be protected from Development
AP28
- Area of Outstanding Natural Beauty
AP10, 12, 21, 66, 67, 68, 69, 89, 90, 98, 107, 109, 110, 111, 112, 114
- Special Landscape Area
AP10, 21, 67, 68, 69, 89, 90, 98, 109, 110, 111, 112, 114
- Conservation Area
AP1, 2, 22, 32, 53
- Protection of Open Characters between Settlements
AP12
- Landscape Enhancement
AP14
- Protection of Trees and Character
AP17
- Woodbridge School
AP29
- Proposed Open Space
AP28
- Proposed Footpath Links
AP28
- General Employment Area
AP51, 61, 242, 243
- B1/B2 Employment Area
AP242
- B1 Employment Area
AP244, 245
- Garden Centre
AP238
- Enhancement Scheme
AP246, 247, 260
- Use of Existing Agricultural Buildings
AP73, 213
- School Sites
AP233
- Town Centre
AP56, 57, 58, 259, 261, 262, 263
- Prime Shopping Area
AP257
- Church Street and Market Hill
AP258
- Turban Centre
AP255
- New Street/Oak Lane Car Park
AP256
- Houseboats
AP35, 241
- Restoration of Riverside Qualities
AP249
- Riverside Recreational Area
AP250
- Riverside Footpath
AP251
- New Yacht Harbours and Marinas
AP252
- Kingsdon Middle School
AP254

The Suffolk Coastal Local Plan

Incorporating the First Alteration

INSET 2 WOODBRIDGE & MELTON

Including
INSET 2a WOODBRIDGE TOWN CENTRE

Adopted 27th February 2001

J.G. Schofield BA(Hons), MCD, MRTP,

Director of Planning & Leisure

Suffolk Coastal District Council

Council Offices

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