

Ref: RM/EK/01/6229(04March24)IBC

Ipswich Borough Council  
**FAO Planning Services**  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE



4 March 2024

Dear Sir/Madam,

## **RETAIL IMPACT ASSESSMENT – PROPOSED MIXED USE DEVELOPMENT AT LAND NORTH-WEST OF HUMBER DOUCY LANE, IPSWICH**

This Retail Impact Assessment has been prepared on behalf of Barratt David Wilson and Hopkins Homes in support of an outline planning application for use of the site as a mixed-use/commercial development (part Class E and part F2(b)) at Land north-west of Humber Doucy Lane, Ipswich. The description of development is as follows:

*"Hybrid Application - Full Planning Permission for the means of external access to the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works."*

The purpose of this Assessment is to assist Ipswich Borough Council ('Council') by providing a robust and thorough analysis of all the relevant retail considerations having regards to the relevant policies in the statutory development plan and all other material planning policy considerations.

### **Site Description and Surroundings**

The Application Site is located on land north-west of Humber Doucy Lane, Ipswich. It is located within the boundary of two authorities, Ipswich and East Suffolk. The south of the site, along Humber Doucy Lane is predominantly residential characterised by single storey detached properties.

The nearest defined 'Existing Local Centres' is Selkirk Road (to the south) and Colchester Road (to the west) as per the Ipswich Core Strategy Policy Map.

## Proposed Development

As per above, the application proposals include provision for a flexible 'mixed use' area which will comprise an early years nursery as well as provision for commercial and / or community floorspace of up to 400 sq m (as defined on the submitted parameter plan). The commercial / community floorspace could comprise uses within Class E and/or F2(b) (e.g. potentially a small-scale retail use, café, service use and/or community use). The proposed floorspace is intended to provide sufficient space for a small scale retail use alongside space for other 'local centre' or community uses, at a scale that would not compete or undermine the vitality of the nearby local centres.

The proposed two elements of non-residential use are purposely co-located, and set in the centre of the site next to the central open space, to form a clear 'heart' to the development, to provide a focal point for community activity, and to maximise the opportunity for walking and cycling to local facilities for residents.

This assessment will focus on the likely impacts arising from the potential retail floorspace that could come forward. Given the need to secure a flexible permission, this assessment will consider the worst case scenario i.e. if all 400 sq m of the floorspace comes forward as convenience floorspace.

## Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the statutory development plan, unless material considerations indicate otherwise.

Ipswich Core Strategy and Policies Development Plan Document Review (2022)

### Policy ISPA4 (Cross Boundary Working to Deliver Sites)

*Development will be expected to comply with the following criteria:*

- f) *Current infrastructure requirements are as follows (subject to any additional infrastructure that may be identified as part of the planning application process):*
  - viii. *As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities".*

As discussed above, this allocation will be delivered across two authorities, **policy SCLP12.24** of the East Suffolk Coastal Local Plan (2020) is also relevant.

#### **Policy DM30 - District and Local Centres**

*Outside District Centres but within a 400m straight line distance of the centre the provision of community facilities will be permitted provided the facility:*

- e) is appropriate in scale and supports the needs of the adjacent residential area;*
- f) is accessible to all sectors of the community; and*
- g) offers satisfactory vehicular access and car parking space in accordance with the Council's standards.*

#### **Policy DM32 - Retail Proposals Outside Defined Centres**

*Retail proposals in locations outside defined centres will only be permitted if the proposal can be demonstrated to be acceptable under the terms of the National Planning Policy Framework (NPPF), particularly in terms of:*

- a) the appropriate scale of development;*
- b) the sequential approach;*
- c) avoiding significant adverse impact on existing defined centres, including any cumulative impact; and*
- d) accessibility by a choice of means of transport.*

*Retail developments of more than 200 sq.m. net outside defined centres will be required to undertake a Retail Impact Assessment. Assessment of the retail impact of proposed development on the Central Shopping Area will only be required where the retail floorspace proposed exceeds 525 sq. m net.*

*The requirement for a sequential test does not apply to applications for small scale rural offices or other small scale rural development.*

#### NPPF (2023)

The NPPF, at its heart, has a presumption in favour of sustainable development. There are three overarching objectives to sustainable development (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways.

- a) ***an economic objective*** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) ***a social objective*** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) ***an environmental objective*** – *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

For decision-making, it requires local planning authorities ('LPAs') to adopt a positive and creative approach to decision-making and approve applications for sustainable development where possible.

In addition, the following chapters are noteworthy –

- **Chapter 6 (*building a strong, competitive economy*)** – explains decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- **Chapter 7 (*ensuring the vitality of town centres*)** – states that where an application fails to satisfy the sequential test or is likely to have significant adverse impact it should be refused. Details of how this policy direction should be applied are set out within **Sections 8 and 9** in this RIA.
- **Chapter 8 (*promoting healthy and safe communities*)** – states that planning decisions should aim to achieve healthy, inclusive and safe places which includes promoting social interaction and enabling and supporting healthy lifestyles (such as local shops and access to healthier food).

- **Chapter 9 (*promoting sustainable transport*)** - seeks to limit the need to travel and maximise sustainable transport solutions. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

## Sequential Test

We note that Policy DM32 requires retail proposals outside of defined centres to demonstrate (inter alia) that the sequential approach has been adopted. At the national level, the NPPF states at paragraph 90 that proposals for main town centre uses on out-of-centre sites should undertake a sequential approach to site selection as follows:

*'Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered'.*

It continues at paragraph 92,

*'When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored'.*

Details of how this policy direction should be applied are contained in the Planning Practice Guidance ('PPG'), as well as relevant case law. We consider these, in turn, below -

### Planning Practice Guidance

Paragraph 011 in the PPG states the following considerations should be taken into account when 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. It is important to set out any associated reasoning 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.*

In line with paragraph 91 in the NPPF, when considering a 'reasonable period' the 'scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account'.

Paragraph 012 in the PPG explains that the ***'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'***.

#### Applicant's Requirements

Before assessing the sequentially preferable sites, it is important to understand the need for the retail floor space and the applicant's' requirements to better understand the rationale for the scale, format and type of retail floorspace proposed on the application site.

The site allocation acknowledges that *"the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities"*. Given the allocation seeks to deliver at least 600 new homes and noting the current proposals include provision for 660 new homes, this will generate a population of around 1,600 new residents. These residents will require access to employment, services as well as shops to meet their 'day to day' needs. Day to day shopping needs are usually met by smaller convenience retail stores, as opposed to larger foodstores, which are easily accessible and provide essential goods.

We would stress that the proposals seek to deliver a small-scale store which will only serve a local catchment area. The profile of customers will comprise those living nearby who will generally walk to the store to undertake their regular top-up shopping, possibly as a linked trip with uses in the nearby Local Centre. As a result, convenience stores typically serve a localised catchment and from experience this will be up to 800m walking distance (which is around 10 minute walk).

We note that the existing Co-op stores at Selkirk Road and Colchester Road are around 1,400m apart, which illustrates this point. We have prepared the attached 'Existing and Proposed Retail - Walking Catchments (800m)' plan which confirms the location of the two local centres, as well as the location of the proposed commercial floorspace proposed as part of the current application. The plan also includes the extent of an 800m walking catchment for each location (i.e. red for the application proposals, green for Colchester Road and blue for Selkirk Road).

The NPPF and Policy DM32 of the Local Plan stipulate that a sequential approach is applied to site selection requiring that all in centre, followed by edge of centre sites are thoroughly assessed and considered before taking into consideration out of centre locations.

Given the need for the retail provision in this case is to serve 'day to day' needs it should be easily accessible for future residents on the wider application site. Both the Co-op stores at Selkirk Road and Colchester Road would be at the outer extent or beyond an 800m walk for the majority of future residents of the wider development. The submitted catchment plan confirms there is only limited overlap of the existing local centre and proposed retail catchments. As a result, we do not consider that the area of search for the sequential assessment should extend to the existing local centres as an additional store in these locations would not meet the identified need.

Accordingly, the application site remains the most appropriate location in which to meet the need that the application scheme aims to fulfil. To conclude we consider that the proposals pass the sequential test and satisfy the requirements Policy DM32 and the NPPF.

## Retail Impact

Paragraph 90 in the NPPF states that applications for out-of-centre retail proposals require an impact assessment if the development is over a proportionate, locally set floorspace. **Policy DM32 confirms that retail developments of more than 200 sq.m. net outside defined centres will be required to undertake a Retail Impact Assessment.** In line with the policy direction at the national and local levels, our impact assessment will include:

- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment.*

It is important to note from the outset that paragraph 95 in the NPPF confirms that an application should only be refused where the proposed development is likely to have a 'significant adverse' impact.

***Impact on Existing, Committed and Planned Public and Private Investment***

We are not aware of any existing, committed and planned investments which are comparable or competing on a like-for-like basis in either Selkirk Road or Colchester Road Local Centres that would be adversely impacted upon by the Proposed Development. As set out below, it would draw a small amount of trade from these centres and, as such, it is unlikely to result in any material impacts.

***Impact of the Proposal on Town Centre Vitality and Viability, Including Local Consumer Choice and Trade in The Town Centre and the Wider Retail Catchment***

We have undertaken a high level assessment of retail impact on the basis of a worst case scenario (i.e. all 400 sq m will be used for convenience retail). Whilst any assessment should consider the impacts on the local centres as a whole, we have focused on the likely impacts on the Co-op stores which will effectively act as an anchor for the centres.

The Co-op at Selkirk Road is around 450 sq m gross and we estimate it has a retail sales area of 270 sq m. The Co-op at Colchester Road is much smaller with a gross floor area of 150 sq m and a retail sales area of 120 sq m. Whilst convenience stores will predominantly sell food related products they will in all cases sell a small amount of comparison / non-food items. Typically around 15% of the floor area will be dedicated comparison items (e.g. newspapers, magazines, personal care goods etc.).

We have assessed the likely convenience turnover of the proposed store should all 400 sq m of the floorspace be occupied. The turnover of store will be generated by the retail sales area and not the gross floor area. We note the gross to net sales area ratio of the Co-op at Selkirk Road is 40/60 and we have adopted a ratio of 35/65 i.e. 65% of the floor area will be dedicated to retail sales. This generates a retail sales area of 260 sq m and a net convenience area of around 220 sq m. Table 1 below sets out the proposed convenience turnover of the store using a benchmark estimate.

<b>Table 1: Proposed Turnover</b>				
<b>Location</b>	<b>Net floorspace</b>	<b>Net convenience floorspace</b>	<b>Benchmark convenience goods sales density (£/sq.m)</b>	<b>Benchmark convenience goods Turnover (£m)</b>
<b>Proposed Store</b>	260	220	£7,000	£1.54



We have also assessed the turnover of the existing Co-op stores at Selkirk Road and Colchester Road, as per Table 2 below. We have applied the same benchmark estimate to calculate the turnover of each store however we have also used the survey information and retail data from the Council's Retail and Commercial Leisure Town Centre Study (2017) and Retail Position Update Statement (2019).

The household survey used to inform both reports identifies the market share of each store and using this information we have calculated the turnover of each store at 2029 (noting impacts should be assessed up to 5 years ahead). Whilst both stores will serve a 'top up' food function (as opposed to a main food function typically provided by larger supermarkets), the household survey confirms that local residents were also using the Co-op store Selkirk Road store for some main food shopping trips. This is not unexpected in this case given the lack of large supermarkets within the north east of Ipswich. It should be noted that given the household survey covered a large study area and the existing Co-op stores serve a localised catchment, that the identified market share and resulting turnover will typically be underestimated. That said, Table 2 confirms that both stores trade close to their benchmark estimates.

We note that the wider development will deliver up to 660 new homes and this will generate around 1,600 new residents. Based on the Council's 2019 Retail Position Update Statement convenience spend per head in 2029 will be £2,077 which generate a total convenience spend of in excess of £3.3m (which is more than double the likely turnover of a proposed convenience store). Given this local spend we expect the majority of the new store's turnover (80%) will be derived from future residents as well as those visiting the site (e.g. those using the proposed early years nursery including parents and staff). Given there is some overlap in catchments between the proposed store and existing Co-op stores, albeit limited, we consider that up to 20% (£0.30m) of the store's turnover will be derived from existing residents of north east Ipswich, as well as some residents within the wider rural area that have limited or no access to local shops (e.g. Westerfeld and Tuddenham).

Table 2 provides an estimate of trade draw from the two Co-op stores, as well as that from other retail locations. In respect of the latter we expect some loss of trade from other stores and retail locations given there will be customers visiting the site who live beyond the local catchment (e.g. parents and staff using the proposed nursery as well as those visiting other residents). We have forecast the main level of trade draw will be derived from the Co-op at Selkirk Road, given that it is comparable in terms or floorspace. We have forecast only a small level of trade draw from the Co-op at Colchester Road given that this is a much smaller store and likely to draw trade most of its trade from a smaller catchment as well as pass by trade given its location on a main arterial route. In both cases the stores will continue to

trade close to their benchmark turnovers and this level of impact will not threaten the viability of the stores or the centres they are located within.

<b>Table 2: Turnover and Impact at 2029</b>								
Location	Net floorspace	Net convenience floorspace	Benchmark convenience goods sales density (£/sq.m)	Benchmark convenience goods Turnover (£m)	Survey Based Convenience turnover 2029 (£m)	Trade Draw 2029 (£m)	Post Impact Turnover (£m)	Impact
East of England Co-op, Selkirk Road Local Centre	270	230	£7,000	£1.61	£1.71	£0.15	£1.56	<b>8.79%</b>
East of England Co-op, Colchester Road Local Centre	120	110	£7,000	£0.77	£0.63	£0.03	£0.60	<b>4.79%</b>
Other	N/A	N/A	N/A	N/A	N/A	£0.12	N/A	<b>N/A</b>

Based on the above we do not consider the level of trade draw and resulting impact would lead to a 'significant adverse' impact on either stores or indeed their respective centres. Indeed the proposals will facilitate the delivery of a new store which would promote more sustainable shopping patterns by reducing the need for future residents to travel further afield (usually by car) to undertake their day-to-day shopping trips. This benefit is clearly acknowledged by Policy ISPA4.

## Conclusion

It has been clearly demonstrated that the application site satisfies the sequential test and the proposed development would not impact on any existing, committed and planned investment and there would be no significant adverse impact on the vitality and viability of either local centres. Indeed, the proposals can deliver new retail floorspace to meet future residents' day-to-day needs and this will promote more sustainable shopping patterns by reducing travel demand.



# Existing and Proposed Retail Walking Catchments (800m)

Legend

Application Site

Colchester Road Local Centre

Proposed Mixed-Use/Commercial

Selkirk Road Local Centre





Retail Tables - Humber Doucy Lane, Ipswich



Table 1: Proposed Turnover

Location	Net floorspace	Net convenience floorspace	Benchmark convenience goods sales density (£/sq.m)	Benchmark convenience goods Turnover (£m)
Proposed Store	260	220	£7,000	£1.54

Notes:  
Floorspace figures - P+S Estimate  
Benchmark convenience turnover P+S estimates.

Table 2: Turnover and Impact at 2029

Location	Net floorspace	Net convenience floorspace	Benchmark convenience goods sales density (£/sq.m)	Benchmark convenience goods Turnover (£m)	Survey Based Convenience turnover 2029 (£m)	Trade Draw 2029 (£m)	Post Impact Turnover (£m)	Impact
East of England Co-op, Selkirk Road Local Centre	270	230	£7,000	£1.61	£1.71	£0.15	£1.56	8.79%
East of England Co-op, Colchester Road Local Centre	120	110	£7,000	£0.77	£0.63	£0.03	£0.60	4.79%
Other	N/A	N/A	N/A	N/A	N/A	£0.12	N/A	N/A
						£0.30		

Notes:  
Floorspace figures from Business Rates Online Valuation  
Benchmark convenience turnover P+S estimates.