ALYN
NICHOLLS
CHARTERED TOWN PLANNER

PROPOSED DEVELOPMENT AT

SHACKLETONS HOME AND GARDEN CENTRE CLITHEROE ROAD, CHATBURN BB7 4JY

RETAIL IMPACT ASSESSMENT

FEBRUARY 2020

UPDATED October 2020

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APPENDICES

1.0 INTRODUCTION

1.1 This report addresses the retail impact arising from a planning application by Shackletons to remodel and extend the Home and Garden Centre located at Clitheroe Road, Chatburn.

1.2 Shackletons is an established Home and Garden Centre located about 2.5 kilometres to the north of Clitheroe Town Centre and about 500 metres to the south of the centre of Chatburn. The site area is approximately 2.5 hectares and the buildings have been developed on an incremental basis over time. They presently provide about 3,367 square metres of accommodation of which about 3,090 is retail sales area. In addition, there is an area of greenhouse and outdoor plant sales of 990 square metres. There is also a café. Areas for parking extend to the east of the main buildings.

1.3 The planning history of Shackletons is set out in detail in the Planning Statement by PWA Planning that forms part of the current application. There is a Section 106 Obligation dated 3 August 2009, pursuant to planning permission reference 3/2005/0999 (the 2009 permission), and a deed of variation dated 27 August 2010 relating to permission reference 3/2010/0378 (the 2010 permission) which control the goods that may be sold from Shackletons. In short, the Planning Obligations restrict goods that may be sold from the site to plants, gardening products and equipment and within the buildings a wider range of non-food goods may be sold. Notably fashion clothing and footwear are prohibited from being sold. Appendix 1 sets out the schedules of goods that may be sold and a plan from the S106 that illustrates the defined areas.

The Proposed Development

1.4 The proposal is to reconfigure and extend Shackletons premises as follows:

Use	Existing Area (sqm)	Proposed Area (sqm)	Change (sqm)
Outdoor Furniture Sales	860	1,310	+450
Indoor Furniture Sales	1,610	2,540	+930
Kitchen Furniture Sales	105	162	+57
Potting Shed	200	200	
Sundries	315	410	+95
Total Retail Floorspace	***3,090***	***4,622***	***+1,532***
Café	162	420	+258
Back of House {Kitchen, Toilets etc.)	115	375	+260
Play Area		143	+143
Total Ancillary and Support Floorspace	***277***	***938***	***+661***
Greenhouse/outdoor plant sales display	990	980	-10
Total Area	**4,357**	**6,540**	**+2,183**

1.5 The application also proposes the reconfiguration and organisation of car parking.

1.6 The increase in retail floorspace is 1,532 square metres net floorspace that would predominantly be used for the sale of furniture: 930 square metres for outdoor furniture and 450 square metres for indoor furniture. There would be a small increase in the sale of sundries (95 square metres) and kitchen furniture (57 square metres).

1.7 The additional floorspace at Shackletons can be characterised as being for furniture sales, an element being for garden furniture, in a garden centre setting. Whilst the proposal is to increase amount of retail floorspace, no significant change is sought in the categories of goods that may be sold, although flexibility is sought to enable a wider range of seasonal goods to be sold.

1.8 The proposals have been the subject of pre-application discussions with the Council. The Council's response to a pre-application enquiry, dated 21 October is attached at Appendix 2. Subsequent to this response from the Council, a note was prepared setting out a scope of work for the retail impact assessment that was forwarded to the Council for comment (the Scoping Note). This is attached at Appendix 3. The Council's responses to the Scoping Note is attached at Appendix 4. The responses are in two emails to PWA Planning:

- Email of 10 December 2019 from Rebecca Turner. Planning Policy Assistant that identifies proposals at 44-46 King Street Clitheroe has being of significance to Clitheroe Town Centre. It also provides a spreadsheet containing information on planning applications for retail development.

- Email of 17 December 2019 from Adam Birkett, Planning Officer refers to planning application reference 3/2018/0274 for a retail development. This application was accompanied by a sequential and impact assessment. The email comments that garden centres represent specialist destinations and regard must be had to the level of competitor garden centres operating in the local area together with the accessibility of the subject site. It also states that the work undertaken for this application would provide a helpful basis for estimating the anticipated catchment area, but this would undoubtedly include the town centre of Clitheroe

1.9 As the response of the Council to the pre-application enquiry notes that Shackletons Home and Garden is, for the purposes of prevailing planning policies, in an out-of-centre location. A planning application for additional retail development is required to demonstrate compliance with the sequential approach to site selection (the sequential test) and that the proposal would not undermine investment in a town centre or otherwise undermine the vitality and viability of a town centre (the impact test). Planning application reference 3/2018/0274 referred to in the Council's email 17 December was for the development of a retail unit of 1,380 square metres gross floorspace for the sale of furniture and associated goods at Barrow Brook Enterprise Park, Barrow. This site is a little over 3 kilometres to the south of Clitheroe Town Centre and nearly 6 kilometres to the south of the Shackletons site. The Barrow Brook application was granted planning permission on 3 August 2018, subject to conditions. Condition 3 restricts the ranges of goods that may be sold from the development. This application was supported by a Retail Assessment prepared by WYG and the Council instructed Lichfields to advise on retail policy matters arising from the application. The work undertaken by WYG and Lichfields and the Council's consideration of that application are useful in the consideration of the Shackletons proposal.

1.10 A sequential assessment for the Shackletons proposal has been undertaken by PWA Planning and is a separate document supporting the application. Reference is made to the sequential assessment in considering the overall assessment of the application against relevant retail policy in this report.

1.11 Shackletons have provided guidance on customer characteristics and trading patterns. Two points are relevant for the impact assessment. The first is that Shackletons draws customers from a very wide area. Approximately 80% turnover is drawn from the Blackburn, Preston and Bradford postcode areas. This is a very extensive area. Some 20% comes from even further afield. Shackletons is clearly a shopping destination that draws people into the Clitheroe area. The second factor is that the trading performance of Shackletons is on par with national garden centre operators such as Dobbies and Wyvale, but higher than most furniture retailers. The trading effects of a new development will be dispersed over a wide area. Town Centres beyond Clitheroe, even others with Ribble Valley are unlikely to be affected materially, particularly as Shackletons will tend to compete in the first instance with other garden centres and furniture retailers. There are furniture shops with Clitheroe. Considering these factors, the impact and sequential assessment focus on Clitheroe as being the nearest Town Centre.

1.12 A retail impact assessment was undertaken to support the Proposal in February 2020. The submission of the application was delayed because of the Covid-19 pandemic and the uncertainty it created. The report is an update of the February 2020 analysis and report and takes account of the impact of the pandemic insofar as possible. The Update also takes account of the changes to the Use Classes Order that came into effect on 1 September 2020.

1.13 The following section of this report summarises relevant planning policy. Section 3 provides an overview on the health of Clitheroe Town Centre. Section 4 addresses the likely impacts arising from the current proposal and Section 5 sets out a summary and draws conclusions.

2.0 RELEVANT POLICY

2.1 Relevant policy includes the National Planning Policy Framework ("the NPPF") published in February 2019 and the relevant parts of the National Planning Practice Guidance ("the PPG")[1]. The Development Plan comprises the Ribble Valley Core Strategy (2014) and the Ribble Valley Housing and Economic Development, Development Plan Document (2019) (the HED DPD).

The National Planning Policy Framework

2.2 The current edition of the NPPF was published on 19 February 2019.

2.3 Securing a sustainable pattern of development is a cornerstone of the NPPF. In respect of decision-taking, paragraph 11 states that development proposals that accord with a Development Plan should be approved without delay and that where are no relevant Development Plan policies, or when policies which are most important for determining an application are out-of-date, permission should be granted unless the application of NPPF policies that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or when any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole. The onus in plan-making and decision-taking is to accommodate development requirements and to refuse planning permission only when there are clear adverse impacts or where there are specific policy objections. However, it also explains that this presumption does not override the statutory requirement arising from Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990, to determine applications in accordance with the Development Plan unless material considerations indicate otherwise (NPPF paragraph 12).

2.4 Section 7 of the NPPF is concerned with ensuring the vitality of town centres. Paragraph 85 identifies matters that local planning authorities should consider when drawing up Local Plans. These include the following:

- define a network and hierarchy of centres and promote their long-term vitality and viability;

- allocate a range of suitable sites to meet development needed in town centres. It stresses the importance that the needs for retail, leisure, office and other main "town centre" uses are met in full and are not compromised by limited site availability;

- allocate appropriate edge of centre sites for main "town centre" uses and if sufficient edge of centre sites cannot be identified, set policies for meeting the identified need in other accessible locations that are well connected to the town centre; and if sufficient edge of centre sites cannot be identified, policies should explain how needs can be met in other accessible locations.

[1] For retail and town centre development this was last updated in July 2019.

2.5 Paragraph 86 of the NPPF is concerned with the "sequential test" for main “town centre” uses that are not in an existing centre and not in accordance with an up-to-date Local Plan. Paragraph 86 states that local planning authorities should require applications to be located in town centres, then in edge of centre locations and only if suitable sites are not available, or expected to become available within a reasonable period, should out of centre sites be considered. Paragraph 87 adds that when considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. It adds that applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

2.6 Paragraph 89 of the NPPF is concerned with impact and it relates to proposals for development which are not in accordance with an up-to-date Local Plan and which fall outside a town centre. It indicates that when proposals are over a proportionate, locally set floorspace threshold (or if there is no locally set threshold the default threshold is 2,500 square metres), local planning authorities should require an impact assessment. Paragraph 89 specifies only two matters that should be included within an assessment of impact. These are:

- impact of the proposals on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposals; and

- the impact of the proposals on town centre vitality and viability including local consumer choice and trade in the town centre and wider retail catchment as applicable to the scale and nature of the proposal.

2.7 Paragraph 90 of the NPPF indicates that where an application fails to satisfy the sequential test or is likely to have significant adverse impacts on one or both factors identified in paragraph 89, it should be refused. Securing sustainable economic growth is a cornerstone of the NPPF. Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. It describes this as a golden thread running through plan-making and decision-taking. In respect of plan-making, it explains that this means that local planning authorities should positively seek opportunities to meet the development needs of their area and that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless any adverse impacts of doing so would outweigh the benefits or where specific policies within the NPPF indicate that development should be restricted.

2.8 Within Section 1 of the NPPF, under the heading "Delivering Sustainable Development", paragraphs 18 to 22 are concerned with building a strong, competitive economy. Paragraph 18 sets out the Government's commitment to secure economic growth to create jobs and prosperity and in paragraph 19 it notes that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. It also states that significant weight should be placed upon the need to support economic growth through the planning system. Retailing is an important sector of the economy and as an industry provides employment directly and indirectly.

2.9 Consequently, taking account of policies for town centres and retail development, the NPPF:

- encourages retail development to improve choice and promote competition;
- requires a sequential approach to site selection which provides a framework to accommodate needs;
- requires impact assessments where proposals are outside a town centre and not in accordance with an up-to-date Local Plan; and
- indicates that a failure to satisfy the sequential test or when proposals are likely to have a significant adverse impact, proposals should be refused.

2.10 Paragraphs 186 and 187 of the NPPF refer to decision-taking. They indicate that local planning authorities should approach decision-taking in a positive way, looking for solutions not problems and that decision-takers should seek to approve applications for sustainable development where possible.

The National Planning Practice Guidance (The "PPG")

2.11 The PPG was published as a web-based resource in March 2014. Parts of the section on town centres and retail development was updated in July 2019 and other parts were inserted and updated in September 2020. The PPG functions as a source of information on the planning process and it provides guidance on the application and implementation of policies within the NPPF[2].

2.12 The PPG reiterates policy within the NPPF that local planning authorities should plan positively to support town centres for a variety of reasons. Reference is made to the importance of having a strategic vision for town centres and it provides advice on the contents of town centre strategies. It goes on to discuss market signals to be addressed when planning for town centres and it identifies the indicators used to determine the health of town centres when plan-making.

2.13 It acknowledges that it may not be possible to accommodate requirements in a town centre and there may be physical or other constraints which make it inappropriate to do so. In these circumstances it advises that local planning authorities should plan positively to identify the most appropriate alternative strategy for meeting identified requirements having regard to the sequential and impact tests. It adds that this should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres and that no likely significant adverse impacts on town centres arise.

2.14 In respect of the impact test, the PPG indicates that the purpose is to ensure that the impact of proposals over time is not significantly adverse. It states that it is for the

[2] The PPG is not policy and there is no legal requirement to follow the guidance. See Solo Retail Ltd v Torridge District Council [2019] EWHC 489 (Admin) ("the Solo Judgement").

applicant to demonstrate compliance with the impact test in support of relevant applications. It adds that the test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Where wider town centre developments or investments are in progress, the PPG indicates it would be appropriate to assess the impact of the relevant application on that investment. It sets out key considerations in this context which include the policy status of the investment, the progress made towards securing the investment and the extent to which an application is likely to undermine developments or investments based on the effects on current/forecast turnovers and operator demand and investor confidence.

2.15 The PPG then sets out a checklist for applying the impact test. The steps within the checklist are as follows:

- establish the state of existing centres and the nature of current shopping patterns (base year);

- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur;

- examine the "no development" scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);

- assess the proposal’s turnover and trade draw (drawing on information from comparable schemes, the operator’s benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw);

- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact);

- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues;

- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal’s trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences for the viability and vitality of existing town centres.

2.16 The Solo Judgement indicates that the steps outlined above are guidelines and if applied have to have regard to the overarching advice that impact assessments need to be proportionate. The PPG adds that a judgement as to whether any adverse impacts are significant can only be reached considering local circumstances. It cites as an example in areas where there are high levels of vacancy and limited retailer demand, even a very modest trade diversion from a new development may lead to a significant adverse impact. On the other hand, where evidence shows there would be no significant impact on a "town centre", the local planning authority must then consider all other material considerations in determining the application as it would for any other development.

2.17 The changes to the Use Classes Order introduced on 1 September 2020 creates a new broad 'commercial, business and service' use class (Class E) which incorporates the previous shops (A1), financial and professional services (A2), restaurants and cafes (A3) and offices (B1) use classes. Uses such as gyms, nurseries and health centres (previously in use classes D1 Non-residential institutions and D2 Assembly and leisure) and other uses which are suitable for a town centre area are also included in the class. Class E is intended to allow for a mix of uses within town centres. The purpose in bringing these uses together and allowing movement between them is to give businesses greater freedom to adapt to changing circumstances. The PPG provides guidance about changes of use between different types of business that no longer are development and therefore do not require planning permission.

Ribble Valley Core Strategy (2014)

2.18 The Development Plan comprises the Ribble Valley Core Strategy (2014). The most relevant policies to retail matters are:

- Key Statement DS1 of the Ribble Valley Core Strategy sets out that new retail development will be directed towards the centres of Clitheroe, Longridge and Whalley;

- Key Statement EC2 directs new development to the existing centre hierarchy and identifies a need for additional retail development over the plan period at Clitheroe;

- Policy DMR1 encourages retail development at Clitheroe Town Centre and states that it is the only part of the Borough considered to be suitable and capable of accommodating major retail development. For proposals outside the main shopping area the policy requires the sequential test to be engaged. Proposals of more than 1,000 square metres gross floorspace are required to be accompanied by a retail impact assessment (the application would exceed this threshold);

2.19 Core Strategy Policy DMR3: Retail Outside the Main Settlements is concerned with the loss shopping provision in rural areas and the development of farm shops. It is not of direct relevance to the Proposal.

Housing and Economic Development DPD (2019) (HED DPD)

2.20 The HED DPD was adopted in October 2019. Policy CMR1: Clitheroe Market Redevelopment allocates land at the market for development with the aspiration to introduce new retail, leisure and open space to the town centre to support and enhance the long-term vitality and viability of the town centre. The area identified on the Proposals Map reflects the extent of the Council's ownership and the area for which development proposals would be considered. Other than note that the extent of the site shown on the Map, Policy CMR1 contains no guidance as to the requirements of any redevelopment.

Summary

2.21 The location of the proposal is outside a town centre and the site is not allocated for retail development in the Development Plan. The NPPF requires consideration of whether there are sequentially preferable sites or premises that are suitable and available to accommodate the current application and an assessment of the proposal on the health of the town centre. The emphasis within the NPPF is on positive planning to ensure that requirements are met in full. Consequently, the sequential approach to site selection provides a framework to accommodate growth. However, where an application fails to satisfy the sequential test, or when it is likely to have a significant adverse impact on investment within a centre, or town centre vitality and viability, proposals should be refused planning permission.

2.22 Policies for retail development within the Core Strategy support and direct retail development to Clitheroe; it identifies a requirement for additional retail floorspace at Clitheroe; it sets out the requirement for proposals located outside the town centre to satisfy the sequential approach to site selection and when proposals exceed the local threshold of 1,000 square metres floorspace, applications should be supported by a retail impact assessment. The HED DPD allocates land in the ownership of the Council at the Market within the Town Centre for a mixed-use scheme to support the future vitality and viability of the Town Centre.

3.0 CLITHEROE TOWN CENTRE

3.1 Clitheroe is a principle settlement within Ribble Valley[3], and it is the largest town centre in the District. Beyond the boundaries of the District are the built-up areas of Blackburn, Preston, Accrington and Burnley all of which have larger retail centres and attract shoppers from Ribble Valley.

3.2 Clitheroe functions as a market town, a service and an administrative centre. The town is featured regularly in the media as one of the best places to live, providing a balance of education and work opportunities; a low cost of living; a strong cultural offering and a high standard of built environment and the natural beauty of the surrounding countryside. In this context, within the Town Centre there is a high proportion of independent shops and services that enhances quality and adds to local distinctiveness.

Experian Town Centre Report for Clitheroe

3.3 Experian produce data on businesses with town centres. The most recent Town Centre Category Report and GOAD Plan for Clitheroe is based on a survey in October 2018. The Report provides data for the town centre by category of business in terms of floor space and the number of units. The town centre for the purposes of the data comprises the main shopping streets of Moor Lane, Castlegate, Castle Street, Market Place, Well Gate and King's Street. It also includes Booths, Tesco and Sainsburys' supermarket as well as the Homebase store adjacent to Sainsbury's[4].

3.4 In terms of outlets, the Experian Report indicates there are 232 within the survey area. Of these 93 (40%) are occupied by comparison businesses. This is significantly above the national average of 29.3% of units within a centre. Types of outlet that are higher than the national average are ladies wear and accessories, children's wear, furniture shops, antique shops, art and art dealers. The GOAD Plan indicates that a high proportion of these types of outlet are occupied by independent traders. There are no outlets in the town centre selling gardening goods and equipment. Hardware and household goods outlets have a lower representation than average.

3.5 With regard to floorspace, total floorspace within the town centre, as surveyed is 38,500 square metres gross floorspace (Ground floor footprint). Comparison outlets comprise 14,990 square metres of this total. This is about 39% of total floorspace within the centre. The UK average is 35% of floorspace in a centre being occupied by comparison businesses. Compared to the national average, ladies wear, children's wear, furniture and furnishings, antique shops and art and art dealers occupy a higher than average percentage of floorspace. Charity shops also occupy a higher percentage than the national average.

3.6 The Experian data indicates there are 16 convenience outlets which represent 6.9% of all outlets in the centre. The national average is 9.2%. However, total floorspace is 7,990 square metres gross which is 20.9% of all outlets. The national average is 15.4%. The data

[3] Ribble Valley core strategy, key statement DS1: Development Strategy
[4] Lidl at Shawbridge Street is not included

for Clitheroe reflects the presence of the Booths, Sainsbury's and Tesco supermarkets within the centre as defined for the purposes of the survey. The average size of convenience outlets within the centre is greater than the national average.

3.7 Retail services such as dry cleaners, health and beauty salons, travel agents, comprise 35 outlets. This is 15.1% of all units and the same as the national average which is also 15.1%. Floor space occupied by retail services is 2,390 square metres, which is 6.2% of all outlets in the centre. This is marginally lower than the national average of 7%.

3.8 Leisure services within the centre such as restaurants, bars and cafes represent 19% of all outlets, 44 units. This is lower than the national average of 24.5% of outlets in a centre. Total floorspace in leisure services in Clitheroe is 8,080 square metres. This is 21% of all floorspace and is lower than the national average of 25.5%.

3.9 There are 30 outlets used for financial and business services within the town centre. This is 12.3% of all outlets and is higher than the national average of 9.8%. floorspace is 3,730 square metres gross, which is 9.7% of all floorspace in the centre. This is also higher than the national average of 7.3%. This reflects the service role of the Town Centre.

3.10 Vacancies are an important indicator of the health of a town centre. The Experian data indicates there are 14 vacant units which represents 6% of all units within the town centre. This is half the national average of 11.9%. In terms of floorspace, vacancies amount to 1,260 square metres gross which is 3.3% of town centre floorspace. The national average is 10.5%. The rate at Clitheroe is therefore less than one third of the national vacancy rate measured by floorspace.

3.11 Overall the Experian data is indicative of a healthy market town. Vacancy rates are low, there is a broad mix of shops and services and there is a high representation of categories of retail outlets that are most likely to be independent traders. Financial and business services are also well represented which reflects the function of the town as a service centre.

Ribble Valley Service Centre Health Check

3.12 The Council's health check survey has adopted the indicators of the health of a centre from the National Planning Practice Guidance (PPG). The main points of the assessment of Clitheroe town centre are summarised as follows:

- The health check focuses on comparisons between Clitheroe, Longridge and Whalley.

- Clitheroe has a higher percentage of comparison shops (53%) compared to the national average (41%).

- Vacancy levels are lower in Clitheroe (5%), compared to the national average (13%).

- The presence of supermarkets within the centre significantly increases the proposition of the convenience sector in the town centre.

- Clitheroe is the only centre in the district to have a permanent market site.

- Clitheroe has twice as many shops in retail use compared to Longridge and seven times the amount compared to Whalley.

- Outside Clitheroe town centre there is Lidl located on Shawbridge Street and Aldi at Whalley Road, next to a Pets at Home outlet. These developments are considered to have increased employment opportunities and consumer choice in Clitheroe, helping to retain and enhance retail spend and strengthen the local economy.

- Holmes Mill complex has been developed into a leisure destination in the town centre. This helps to further the local leisure and visitor economy.

- In terms of opportunities for growth, the market site in Clitheroe has been identified as a potential development site[5].

- Regarding retailer representation, there are some national and multiple retailers in Clitheroe, but the strength of the town is the number of independent clothing retailers. The town's market contributes to the independent profile of the town centre.

- Rental levels are comparable with and in some cases favourable other centres of a similar size and characteristics.

- Vacancy levels in Clitheroe are low.

- The ownership profile of traders in Clitheroe, with a high proportion of owner occupiers render the town centre more immune to national trends.

- Despite the strength of Clitheroe, the catchment is overshadowed by the larger retail economies of Preston, Blackburn, Burnley, Accrington and Nelson.

- There is a concern about town centre retailers moving to edge of town and out of town locations to trade.

- Clitheroe town centre is reasonably accessible.

[5] Whilst this is a Local Plan allocation, development proposals for the site have been abandoned since the health check was undertaken in 2018.

- There are low levels of recorded crime and evidence suggests good perceptions of personal safety within the town centre.

- Environmental quality of all town centres within the district is reasonably good. No comment is made about Clitheroe town centre.

3.13 The summary of the health check for Clitheroe is as follows:

> *"Clitheroe by far accommodates the largest retail economy in Ribble Valley. Although some empty properties exist the 'churn' means many are not vacant for considerable amounts of time and rents and demands for shop units remains relatively high. Any retailers witnessing a fall in shopper numbers and a decline in trade is being compounded as nationally consumer spending is affected by changing consumer buyer habits as well as the competing retail economies of nearby large town centre destinations. Despite a relative lack of national retailer representation. Demand is high for retail units from local, independent retailers and a significant proportion of retailers own their own shop premises. Most recently has seen the development of the Lidl supermarket located on the old Stonebridge Mill site. As well as Clitheroe having a good spread in terms of diversity and mixture of uses, new store development in particular (Homebase and Lidl) has added to the convenience and choice factors in the local area."*

3.14 The overall conclusion is that the three centres of Clitheroe, Longridge and Whalley continue to have individual roles and function in the wider borough in terms of healthy functioning centres. It notes that they play an important role in serving the requirements of the local community on a day to day basis.

Assessment of Retail Proposals at Barrow Brook

3.15 Officers of the Council have drawn our attention to the application for retail development at Barrow Brook that was approved in August 2018 (application reference 3/2018/0274). The impact of these proposals on Clitheroe Town Centre was addressed as part of the planning application. The development comprises a furniture store of 1,380 square metres and includes an ancillary café. WYG produced a Retail Impact Assessment to support the application. Within that Assessment consideration is given to the health of Clitheroe Town Centre. The conclusions of WYG is that Clitheroe Town Centre is vital and viable in accordance with many of the health check indicators set out within the PPG. They note that vacancy levels are considerably lower than national averages, environmental quality within the town centre is high and there is a diversity of uses to provide good choice for consumers. For comparison shopping whilst they note a lack of national multiple retailers there is a strong independent sector which provides a unique element to Clitheroe's attraction as a retail destination.

3.16 The Council appointed Lichfields to assess the Retail Assessment produced by WYG. Lichfields paraphrase the conclusions of WYG on the health of Clitheroe and express the view that there is no reason to believe that Clitheroe town centre is performing contrary to the view reached in the Retail Assessment.

3.17 It is relevant to note that Lichfields considered the key issue as the impact of the Barrow Brook proposal on the planned Clitheroe Market Redevelopment.

3.18 The Officer Report to the Council's Planning Committee on the Barrow Brook application refers to the health check, the low vacancy rate in the town centre that is considerably lower than national averages, the high environmental quality and the diversity of uses providing a good choice for customers in the town centre. Reference is made to WYG and their assessment that the centre is performing well. It also refers to Lichfield's agreement within the assessment of the WYG report[6].

Clitheroe Market Redevelopment

3.19 HED DPD Policy CMR1: Clitheroe Market Redevelopment allocates land at the Market for development with the aspiration to introduce new retail, leisure and open space to the town centre to support and enhance the long-term vitality and viability of the Centre. Up until January 2019 the Council were promoting the redevelopment of this area. The origin of the scheme is a Masterplan for the Town Centre produced in 2010. The Market was identified a key opportunity to strengthen the identity, diversity and experience of the Medieval core. The proposal was to reposition the Clitheroe Market area as a key catalyst project by providing a new market and mixed-use development.

3.20 A Marketing Prospectus for the development was issued by the Council in 2014. This invited initial expressions of interest for the development of the site through a single developer proposal to include the relocation and rationalisation of the market within the site, complementary parking and access arrangements to the town centre and appropriate public realm improvements as part of the scheme. The key objectives of the scheme were noted as follows:

> *"Retail and Leisure:*
> *Practical, and imaginative proposals that will bring forward significant new retail space to attract quality retail operators to the town centre with complementary tourism and leisure development such as an hotel are viewed as key parts of any offer together with a relocated market and cafe within the site. Proposals will need to clearly identify how existing occupiers of the site can be accommodated within the re development, including the costs of any relocations. The scheme should provide for an anchor store with a complementary, quality retail offer to enhance the retail attraction of Clitheroe."*
>
> *Market Requirements:*
> *The Council is seeking to retain a strong and viable market as part of the scheme. The market proposal should include provision for a covered/indoor market with a mix of lockup units and flexible stalls and the café. The market would need to accommodate an appropriate number of cabins and stalls to be*

[6] Paragraphs 5.1.16 and 5.1.17 of the Officer Report

determined in the preparation of the proposal. The Council anticipates that it would continue to operate the market although other management options within the scheme could be considered. Consideration will be needed of the existing market offices and CCTV station currently within the site as part of any proposal however there is no predetermined requirement that these are relocated.

"Car Parking:
Car parking provision should be maximised within the site to serve the development and wider town centre use. It is anticipated that operation of the car park, would be retained by the council however other management options within the scheme would be considered and be subject to detailed negotiation."

3.21 Barnfield were the successful developer appointed in 2015. Public consultation was undertaken in 2016 on a redevelopment scheme that entailed new retail units, a new indoor market and a hotel. The results of the consultation exercise revealed some opposition to the scheme. The development was regarded as large scale retail scheme and there were suggestions that it would undermine the attractiveness of the Town Centre as a destination for independent shopping. There was opposition to the proposed hotel. Some respondents emphasised the contribution of the outdoor market to the character of the Town Centre; and that car parking in the town should be improved.

3.22 The proposal was amended to respond to the feedback from consultation exercise. The revised proposal was considered by the Council's Policy and Finance Committee in June 2018. The decision at that meeting was to progress a development agreement and financial appraisal on the revised scheme. However, progress on the scheme was reviewed by the Committee at its meeting in September 2018 and in January 2019 the Council took the decision not to progress the development. In December 2018 the Ministry of Housing, Communities and Local Government (MHCLG) published a call for expressions of interest to bid for part of the £675 million Future High Streets Fund. The minutes of the January Committee Meeting indicate that the Council was committed to bringing forward a scheme for the re-development of the Market area, but this needed to be done in the context of delivering the right development for the town centre. Given the Council's ambitions for Clitheroe Town Centre and the announcement of the Future High Street Fund, other options for delivering the Council's vision for the Town Centre were more attractive.

3.23 The Market redevelopment remains a Development Plan aspiration and the Council remain committed to secure new investment in the Town Centre. However, at the present time there are no proposals as to how the improvements to the Town Centre in line with HED DPD Policy CMR1 will be delivered.

The Impact of Covid-19

3.24 The Covid-19 pandemic and lockdown measures between 23 March and 15 June 2020 have had a significant impact on retail activity and town centres generally. Specific information on Clitheroe Town Centre is not accessible. However generally:

- There has been a significant reduction in town centre footfall. However, the reduction was not uniform across all town centres. Smaller, multifunctional towns such as Clitheroe have performed much better because of their local service function compared to larger town and cities where people employed in offices and students had not returned[7]. Retail markets have had an advantage in offering outdoor shopping.

- Retail spending had bounced back to pre-lockdown levels by July 2020 and expenditure is expected to grow. Expenditure on food and other essential items has grown but spending on non-food goods was lower during lockdown as shoppers reduced their discretionary spend in light of economic uncertainty and lack of opportunity because of lockdown measures. However, there has been a significant shift to on-line shopping.

- Nationally (total GB) for the period January to July 2020 there was a record number of store closures[8], but store openings by multiple retailers were at their highest level since 2017.

3.25 Generally, the PWC research on store openings and closures reports that with people now spending more time working from home, there has been a resurgence of interest in local high streets. They say that in this environment, multiples are likely to be at a disadvantage to local independents. This is not just because consumers are more likely to support local independents, but because multiples are no longer where consumers are spending more of their time.

3.26 The implications for Clitheroe arise from the changes in the way people presently shop as a consequence of the pandemic and lockdown, especially in the shift to on-line shopping for certain goods. However, the town centre can be expected to perform very well relatively because it is a market town serving the local area, town centre businesses are not reliant on a large commuter workforce, businesses are heavily biased toward independent shops and it has the advantage of an open market, which in current circumstances is attractive because it provides open-air shopping.

Summary

3.27 The evidence of the Experian Report, the Council's Service Centre Health Check and the assessments undertaken by WYG and Lichfields in respect of the Barrow Brook retail proposal, Clitheroe Town Centre is healthy, with a high level of shopping activity within the Town Centre and a low level of vacancies. The Town Centre provides a unique combination of local service provision, a good choice and quality of convenience shopping, augmented by a strong comparison sector comprising a very strong independent sector.

7 Analysis from the High Streets Task Force: Footfall in England: Covid-19 and the Reopening of Retail and High Streets Task Force Covid-19 Intelligence and Impact, September 2020 Update.
8 PWC Store Openings and Closures – 2020: https://www.pwc.co.uk/industries/retail-consumer/insights/store-openings-and-closures.html

3.28 HED DPD Policy CMR1: Clitheroe Market Redevelopment allocates land at the market for development with the aspiration to introduce new retail, leisure and open space to the town centre to support and enhance the long-term vitality and viability of the town centre. Up until January 2019 the Council were promoting the redevelopment of this area. A development partner had been selected, a scheme had been designed and public consultation was undertaken. However, considering the response to consultation, the changes to the scheme that were deemed necessary and the prospect of grant funding for Town Centre improvements from elsewhere caused the scheme to be abandoned. At the present time there are no proposals as to how the improvements to the Town Centre in line with HED DPD Policy CMR1 will be delivered.

3.29 The Covid-19 pandemic has had significant implications for town centres generally. However, retail spend has recovered to pre lockdown levels and continues to grow although there has been a significant shift to online shopping. Detailed specific information is not available for Clitheroe but the implications arise from the changes in the way people presently shop as a consequence of the pandemic and lockdown, especially in the shift to on-line shopping for certain goods, whilst on the other hand, the town centre can be expected to perform very well relatively because it is a market town serving the local area, town centre businesses are not reliant on a large commuter workforce, businesses are heavily biased toward independent shops and it has the advantage of an open market, which in current circumstances is attractive because it provides open-air shopping.

4.0 LIKELY IMPACTS ON CLITHEROE TOWN CENTRE

4.1 The impact test applies to this application because the location is outside a defined town centre, the site is not allocated for retail use and the new retail floorspace within the scheme exceeds the local impact threshold of 1,000 square metres set by Core Strategy Policy DMR1. The Core Strategy indicates that an assessment should be made of whether proposals would seriously affect the vitality and viability of the town centre. NPPF paragraph 89 requires the impact of proposals on investment within town centres to be addressed.

4.2 The PPG states that the onus falls on the applicant to demonstrate that impact of a proposal is acceptable. It also states that an assessment should be undertaken in a proportionate and locally appropriate way drawing on existing information where possible. The existing information relevant to this application and Clitheroe comprises the following:

a) The Ribble Valley Retail Study Update 2013 (Nathaniel Lichfield and Partners)

b) The report of consultation on the Clitheroe Market Redevelopment 2017.

c) The WYG retail assessment for the Barrow Brook application (application reference 3/2018/0274).

d) The audit by Lichfield's of the WYG retail assessment for the Barrow Brook application.

e) The Ribble Valley Service Centre Health Checks 2018.

4.3 The PPG then provides a check list for applying the impact test which in simple terms involves: and to consider how the baseline is likely to change having regard to population and expenditure changes; to consider the no development scenario, which may involve taking account of planning commitments that will come forward and before the proposal is developed; to assess turnover and trade draw of the proposal and to consider these factors in the context of the baseline; and to address plausible alternative scenarios.

4.4 The application of the impact test should also have regard to the following judgements and decisions by the Secretary of State:

- Asda v Leeds CC[9] which affirms that paragraph 19 of the NPPF does not create a presumption, nor a 'tilted balance" in favour of refusal if the proposal does not meet the impact test. It is for the decision taker to consider the weight to be ascribed to the issue of impact in the normal balancing exercise when determining a planning application;

[9] Asda Stores Limited v Leeds City Council and Commercial Development Projects Limited [2019] EWHC 3578 (Admin)

- Solo v Torridge DC[10] which considers the content of retail impact assessments. It notes that the NPPF does not prescribe what an impact assessment should contain. Regarding the guidance within the PPG, the judgement notes it is simply guidance, not policy. The impact checklist not mandatory and is a matter of planning judgement having regard to the circumstances of each case.

- The Scotch Corner decision[11] in which the inspector analyses the requirement of NPPF paragraph 26[12] to consider the impact of proposals of investment within a centre. The inspector notes that existing and committed investment are straightforward terms. Whilst planned investment is not expressly defined in the NPPF or PPG, paragraph 16 of the PPG identifies key considerations. Taking those factors into account as a general proposition, to be considered as planned investment in the context of NPPF paragraph 89, a project must be at a very advanced stage[13].

- In the Cribbs Causeway decision[14] the Secretary of State took account of the facts that Callowhill Court, a sequentially preferable opportunity, was allocated for development plan, the allocation was supported by an evidence base, planning permission for development had been granted, a significant part of the site was under the control of developers and the council had resolved in principle to make a CPO on the balance if required. The Secretary of State considered this scheme to be an investment and planned for the purposes of the impact assessment.

Impact on Investment - Clitheroe Market Redevelopment

4.5 The Market Redevelopment in Clitheroe Town Centre is potentially a scheme that could comprise a town centre investment for the purposes of NPPF paragraph 89. In 2018 a scheme had advanced through a design stage, a developer had been appointed, the land was available, and the proposal been the subject of public consultation, although no planning application had been submitted. In January 2019 that scheme was abandoned in favour of investigation alternative ways of securing improvements to the Town Centre. The current position is that there is a Development Plan allocation for the redevelopment of the site, but no scheme, no developer and no permission for development. Having regard to the approach in the Scotch Corner and Cribbs Causeway decisions, the Market Redevelopment does not qualify as an investment because a scheme has not been crystallised and at an advanced stage.

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[10] Solo Retail Limited v Torridge DC [2019] EWHC 489 (Admin)

[11] Land at Scotch Corner, North Yorkshire "called-in" application decision dated 1 December 2016 (reference APP/V2723/V/15/3132873 and 16/3143678.

[12] Now paragraph 89 of the 2019 version of the NPPF

[13] Inspector's Report paragraph 11.16

[14] The Mall, Cribbs Causeway, Patchway "called-in" application decision dated 1 October 2018 (reference APP/P0119/V/17/3170627)

4.6 The impact of the Barrow Brook application on the Market redevelopment was addresses when Barrow Brook was approved. The Lichfields advice to the Council referred to the Scotch Corner decision and the approach taken towards considering in centre investment in that case. Lichfields also referred to the PPG and the identification of a key consideration as being the progress made towards securing investment. In that point in time there was no planning application for the Market redevelopment and the HED DPD had yet to be adopted. Lichfields took the view at that time, that the proposed investment in the Market redevelopment was neither 'existing' or 'committed' and at best could be described as 'planned'. Lichfields took the view that the scheme was not at an advanced stage and did not warrant further assessment.

4.7 At the time of the Barrow Brook application the Barnfield scheme for the Market redevelopment had not been abandoned although changes had been put forward because of the 2017 consultation exercise. Since then, the HED DPD has been adopted and there is a specific allocation, albeit the wording of policy CMR1 provides no indication as to the expectations of a development. The scheme that was being progressed is no longer being pursued. In terms of PPG guidance and the approach taken by the Secretary of State in determining Scotch Corner and Cribbs Causeway, the redevelopment of the market is an aspiration and not an investment for which is it is appropriate to address the context of NPPF paragraph 89.

Impact on Vitality and Viability

4.8 The second bullet point of NPPF paragraph 89 requires an assessment of the application on town centre vitality and viability including local consumer choice and trade in the town centre and wider retail catchment as applicable to the scale and nature of the proposal. Appendix 5 contains economic tables which provide an analysis of trade and likely impacts arising from the proposed development. The methodology employed in the quantitative impact assessment is set out in the Scoping Note.

4.9 Shackletons have provided guidance about the area from which customers are drawn. It is extensive. The catchment includes the whole of Lancashire and extends into Greater Manchester and Yorkshire. As a consequence of this extensive catchment, the character of the goods sold and the levels of expenditure at the store, the market penetration over the area from which Shackletons draw trade is very low. In the more extended parts of the catchment, the consequence of any change in the turnover of Shackletons that might arises is unlikely to be perceptible on existing town centres. In the more immediate catchment, any changes could impact on the town centres the closest to Chatburn. The nearest centre is Clitheroe Town Centre and this assessment focuses on the likely impact on this.

4.10 Having regard to the guidance in the PPG to use existing information where available, the 2013 Ribble Valley Retail Study Update has been used as the basis of the quantitative assessment, updated as appropriate. The Retail Study provides household telephone shopping survey data study area. Survey zones one to three: Zone 1 being the Forest of Bowland area; Zone 2, the Clitheroe Area; and Zone 3, the Whalley area, have been adopted as the study area for the purposes of this assessment.

4.11 A study period of 2020 to 2025 has been adopted to test the impact of the proposal. This five-year period is consistent with PPG guidance and would allow time for the planning process, tendering, construction and at least one full years trading to allow for the development to settle into an established trading pattern.

4.12 Base population and expenditure estimates for the impact analysis are derived from the WYG Retail Assessment for the Barrow Brook retail application (application reference 3/2018/0274). Estimates of population and expenditure have been updated to the study period (2020-2025). Expenditure data has been updated utilising Experian Retail Planner Briefing Note 17 (February 2020) and with assumptions about the impact of Covid-19 on retail expenditure. Specifically, it is assumed that retail growth in expenditure would be nil in 2020 and that the percentage of expenditure on no-store activity (internet shopping), would be 25% at 2025 which is higher than estimated in the Experian Briefing Note.

4.13 Table 1 attached in Appendix 5 sets out population estimates. Over the Study Area, population is likely to increase by 3,000 in the period to 2025.

4.14 Table 2 sets out estimates of per capita expenditure. The estimates of expenditure take account of anticipated growth and an increase in special forms of trading (mainly internet shopping), between 2020 and 2025. Table 3 shows total available expenditure on comparison goods. The total expenditure within the Study Area at 2020 is about £175 million, increasing by about £18 million in the period to 2025. An increase in expenditure of this order creates conditions to support new retail floorspace.

4.15 Table 4 sets out existing market shares in comparison expenditure by zone. These market shares are based upon the household telephone shopping survey that is integral to the Ribble Valley Retail Study Update. Table 5 sets out the distribution of comparison expenditure by value at 2020. This is derived by applying the market shares from Table 4 to the available comparison expenditure in each zone in Table 3.

4.16 Officers of the Council have provided data on retail developments since 2011. The household telephone shopping survey undertaken for the Ribble Valley Retail Study Update was done in 2013. This is a base date and significant new development either completed or approved since then are treated as commitments. Table 6 shows commitments for comparison shopping. Not all the retail schemes identified on the Council's database are shown on Table 6 as a number are very small in scale and/or involve uses other than non-food retailing. A proportionate approach has been taken and those developments that are likely to have a material effect on shopping have been included. Table 7 shows the trade draw of each commitment. These take account of the distribution of expenditure, the location of the scheme, the nature of the development and the evidence of existing patterns of shopping.

4.17 Table 8 sets out convenience trade diversions and impacts arising from the identified commitments. The trade diversions are based upon existing shopping patterns and reflect a weighting which reflect the principle that "like will impact upon like" in accordance with guidance in the PPG[15]. Table 9 shows the modified market shares in comparison expenditure when the commitments are built into the impact model.

4.18 Table 10 sets out an estimate of the turnover of the proposed additional floorspace at Shackletons. The additional retail floorspace is 1,532 square metres gross. Given the circumstances at Shackletons, it is assumed that all this additional floorspace will be used for retail sales. A turnover to floorspace ratio of £5,000 per square metre has been applied to produce additional expenditure of £7.66 million. The sales density utilised is high, particularly for a furniture outlet and or garden centre. Table 11 shows the trade draw of the additional expenditure at Shackletons. Considering guidance from Shackletons this probably overstates the trade draw from the Study Area and understates the percentage of expenditure from elsewhere. As such the impact exercise probably overstates trade diversion from Clitheroe Town Centre thereby indicating a worst-case scenario.

4.19 Table 12 sets out trade diversions and impacts arising from the proposed extension to Shackletons. As with the assessment of the trade diversions arising from commitments, account has been taken of the principle that "like will impact upon like". Also, whilst no significant change is sought in the categories of goods that Shackletons sell, account has been taken of the flexibility sought to enable a wider range of seasonal goods to be sold. Table 12 shows the greatest trade diversion would be from Clitheroe Town Centre at about -£1.27 million (-1.8%) followed by Blackburn Town Centre (-£1.01 million/-0.4%). Diversion from the new development at Barrow Brook would be in the order of -£0.99 million (-22.4%). It should be noted that the Barrow Brook development is not within a designated town centre and therefore that scheme does not benefit from any policy protection.

4.20 The trade diversion from "other" shopping destinations is -£2.53 million. This reflects the wide trade draw of Shackletons and the fact that trade diversions are likely to be spread across a significant number of centres and retail outlets beyond Ribble Valley.

4.21 In terms of cumulative impact, the combined effects of commitments and the additional floorspace at Shackletons would be to reduce expenditure in Clitheroe Town Centre at 2025 by about -£2.67 million. However, town centre turnover is expected to grow between 2020 and 2025 because of population growth, growth in per capita expenditure and the absence of major locally competing shopping developments. The estimated turnover of the Town Centre at 2025 is £68.91 million with all the shopping commitments being developed and the Shackletons application trading. The estimate of Town Centre turnover at 2020 is £64.91 million. Consequently, the exercise indicates that Town Centre turnover will increase by circa £4 million, even if the various developments, including Shackletons take place.

4.22 It is important to note that the estimates of trade diversion and impact make allowance for the impact of Covid-19 in that expenditure growth in 2020 is assumed to be nil, thereafter returning to the anticipated levels of growth, and it is assumed that internet

[15] Paragraph: 015 Reference ID: 2b-015-20190722

shopping takes a greater proportion of expenditure in 2025 than anticipated. Clitheroe is the type of town centre that stands to perform relatively well because it functions as a local service centre people working from home who might otherwise be commuting to larger centres will be shopping locally, the Town centre has a clear bias towards independent retailers and it has the advantage of a market which can offer open-air shopping.

Summary

4.22 The impact assessment has considered the matters identified in Core Strategy Policy DMR1 and NPPF paragraph 89. It has also had regard to guidance in the PPG particularly regarding adopting a proportionate approach and using existing information here available.

4.23 The first part of NPPF paragraph 89 requires consideration of the implications for investment within a town centre if the application is approved. In this case the only investment that might have been affected was the Markets Redevelopment with Clitheroe Town Centre. The scheme that was being promoted has been abandoned. Whilst a redevelopment of the Market remains an aspiration of Development Plan Policy, there is no proposal and no developer. The redevelopment aspiration is not sufficiently advanced for it to be considered a planned investment in terms of NPPF paragraph 89. It is also relevant to note that when considered the application for development at Barrow Brook, even though at that time a scheme was advance and a developer was in place, even in those circumstances the development was not viewed as being sufficiently advanced.

4.24 There are no other planned developments in Clitheroe or other nearby town centres that would be affected by this application.

4.25 In terms of impact on vitality and viability, the quantitative analysis serves to demonstrate the growth in local expenditure from which Clitheroe Town Centre will benefit over the period of 2025. The impact assessment shows that growth in comparison expenditure is such that expenditure in the Town Centre is likely to increase by circa £4 million notwithstanding the current application and retail commitments, and notwithstanding Covid-19. In these circumstances, the Town centre will continue to grow. There would be no adverse impact on the Town Centre compared to current levels of trade. This is consistent with the health checks of the Town Centre which indicate that the Centre is healthy, with a high level of shopping activity within the town centre and a low level of vacancies. The reality is that Town Centre trade at 2025 will not be quite as high as it might otherwise have been.

5.0 SUMMARY AND CONCLUSIONS

5.1 This report addresses the retail policies issues arising from a planning application by Shackletons to remodel and extend the Home and Garden Centre located at Clitheroe Road, Chatburn. Shackletons is an established Home and Garden Centre located about 2.5 kilometres to the north of Clitheroe Town Centre and about 500 metres to the south of the centre of Chatburn. The site area is approximately 2.5 hectares and the buildings have been developed on an incremental basis over time. They presently provide about 3,367 square metres of accommodation of which about 3,090 is retail sales area. In addition, there is an area of greenhouse and outdoor plant sales of 990 square metres. There is also a café. Areas for parking extend to the east of the main buildings.

5.2 The current application proposes an increase in retail floorspace of 1,532 square metres net floorspace that would predominantly be used for the sale of furniture: 930 square metres for outdoor furniture and 450 square metres for indoor furniture. There would be a small increase in the sale of sundries (95 square metres) and kitchen furniture (57 square metres).

5.3 Planning Obligations restrict goods that may be sold from the site to plants, gardening products and equipment and within the buildings a wider range of non-food goods may be sold. Notably fashion clothing and footwear are prohibited from being sold. Whilst the proposal is to increase amount of retail floorspace, no significant change is sought in the categories of goods that may be sold, although flexibility is sought to enable a wider range of seasonal goods to be sold.

5.4 A retail impact assessment was undertaken to support the Proposal in February 2020. The submission of the application was delayed because of the Covid-19 pandemic and the uncertainty it created. The report is an update of the February 2020 analysis and report and takes account of the impact of the pandemic insofar as possible. The Update also takes account of the changes to the Use Classes Order that came into effect on 1 September 2020.

5.5 The location of the application is outside a town centre and the site is not allocated for retail development in the Development Plan. The NPPF requires consideration of whether there are sequentially preferable sites or premises that are suitable and available to accommodate the current application and an assessment of the proposal on the health of the town centre. The emphasis within the NPPF is on positive planning to ensure that requirements are met in full. Consequently, the sequential approach to site selection provides a framework to accommodate growth. However, where an application fails to satisfy the sequential test, or when it is likely to have a significant adverse impact on investment within a centre, or town centre vitality and viability, proposals should be refused planning permission.

5.6 Policies for retail development within the Core Strategy support and direct retail development to Clitheroe; it identifies a requirement for additional retail floorspace at Clitheroe; it sets out the requirement for proposals located outside the town centre to satisfy the sequential approach to site selection and when proposals exceed the local threshold of 1,000 square metres floorspace, applications should be supported by a retail impact assessment. The HED DPD allocates land in the ownership of the Council at the Market within the Town Centre for a mixed-use scheme to support the future vitality and viability of the Town Centre.

5.7 A sequential assessment for the Shackletons proposal has been undertaken by PWA Planning and is a separate document supporting the application.

5.8 The evidence of the Experian Report, the Council's Service Centre Health Check and the assessments undertaken by WYG and Lichfields in respect of the Barrow Brook retail proposal, Clitheroe Town Centre is healthy, with a high level of shopping activity within the town centre and a low level of vacancies. The town centre provides a unique combination of local service provision, a good choice and quality of convenience shopping, augmented by a strong comparison sector comprising a very strong independent sector.

5.9 HED DPD Policy CMR1: Clitheroe Market Redevelopment allocates land at the market for development with the aspiration to introduce new retail, leisure and open space to the town centre to support and enhance the long-term vitality and viability of the town centre. Up until January 2019 the Council were promoting the redevelopment of this area. A development partner had been selected, a scheme had been designed and public consultation was undertaken. However, considering the response to consultation, the changes to the scheme that were deemed necessary and the prospect of grant funding for Town Centre improvements from elsewhere caused the scheme to be abandoned. At the present time there are no proposals as to how the improvements to the Town Centre in line with HED DPD Policy CMR1 will be delivered.

5.10 The Covid-19 pandemic has had significant implications for town centres generally. However, retail spend has recovered to pre lockdown levels and continues to grow although there has been a significant shift to online shopping. Detailed specific information is not available for Clitheroe but the implications arise from the changes in the way people presently shop as a consequence of the pandemic and lockdown, especially in the shift to on-line shopping for certain goods, whilst on the other hand, the town centre can be expected to perform very well relatively because it is a market town serving the local area, town centre businesses are not reliant on a large commuter workforce, businesses are heavily biased toward independent shops and it has the advantage of an open market, which in current circumstances is attractive because it provides open-air shopping.

5.11 Shackletons have provided guidance on customer characteristics and trading patterns. Two points are relevant for the impact assessment. The first is that Shackletons draws customers from a very wide area. Approximately 80% turnover is drawn from the Blackburn, Preston and Bradford postcode areas. This is a very extensive area. Some 20% comes from even further afield. Shackletons is clearly a shopping destination that draws people into the Clitheroe area. The second factor is that the trading performance of Shackletons is on par with national garden centre operators such as Dobbies and Wyvale, but higher than most furniture retailers. The trading effects of a new development will be dispersed over a wide area. Town Centres beyond Clitheroe, even others with Ribble Valley are unlikely to be affected materially, particularly as Shackletons will tend to compete in the first instance with other garden centres and furniture retailers. There are furniture shops with Clitheroe. Considering these factors, the impact and sequential assessment focus on Clitheroe as being the nearest Town Centre.

5.12 The impact assessment has considered the matters identified in Core Strategy Policy DMR1 and NPPF paragraph 89. It has also had regard to guidance in the PPG particularly regarding adopting a proportionate approach and using existing information here available.

5.13 The first part of NPPF paragraph 89 requires consideration of the implications for investment within a town centre if the application is approved. In this case the only investment that might have been affected was the Markets Redevelopment with Clitheroe Town Centre. The scheme that was being promoted has been abandoned. Whilst a redevelopment of the Market remains an aspiration of Development Plan Policy, there is no proposal and no developer. The redevelopment aspiration is not sufficiently advanced for it to be considered a planned investment in terms of NPPF paragraph 89. It is also relevant to note that when considered the application for development at Barrow Brook, even though at that time a scheme was advance and a developer was in place, even in those circumstances the development was not viewed as being sufficiently advanced.

5.14 There are no other planned developments in Clitheroe or other nearby town centres that would be affected by this application.

5.13 In terms of impact on vitality and viability, the quantitative analysis serves to demonstrate the growth in local expenditure from which Clitheroe Town Centre will benefit over the period of 2025. The impact assessment shows that growth in comparison expenditure is such that expenditure in the Town Centre is likely to increase by circa £4 million notwithstanding the current application and retail commitments, and notwithstanding Covid-19. In these circumstances, the Town centre will continue to grow. There would be no adverse impact on the Town Centre compared to current levels of trade. This is consistent with the health checks of the Town Centre which indicate that the Centre is healthy, with a high level of shopping activity within the town centre and a low level of vacancies. The reality is that Town Centre trade at 2025 will not be quite as high as it might otherwise have been.

Conclusions

5.14 Overall, the application passes the relevant policy tests arising from Development Plan policy and the NPPF. The PWA Report demonstrates that there are no suitable sites available in sequentially preferable locations that might accommodate the application. Regarding impact, Clitheroe has been a healthy and vibrant Town Centre and it is in an advantageous position to withstand the challenges of the Covid-19 pandemic. The proposal would not harm existing, committed or proposed investment within the Town Centre nor have an adverse impact on Clitheroe's vitality and viability.

APPENDIX 1

Schedules of Goods that May be Sold at Shackletons and S106 Plan

PROPOSED DEVELOPMENT AT SHACKLETONS HOME AND GARDEN CLITHEROE ROAD, CHATBURN, CLITHEROE, BB7 4JY

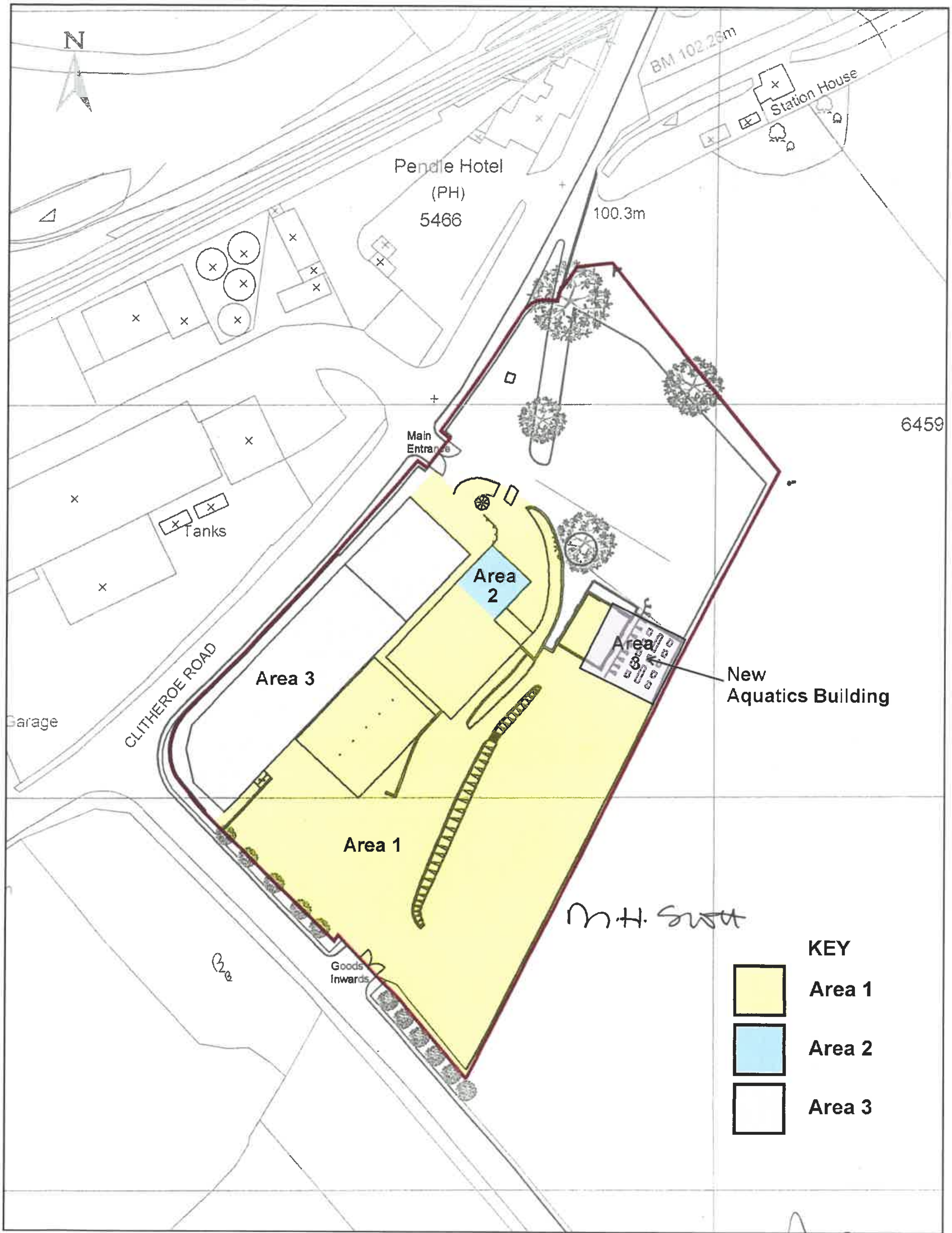
SCHEDULE OF GOODS THAT MAY BE SOLD

AREA 1 (DESIGNATED BUILDINGS AND EXTERNAL DISPLAY AREAS)

- Horticultural products, trees, plants, shrubs, house plant and flowers;
- Propagation seeds, bulbs, seed trays, plant pots etc.;
- Sundries, plant protection and plant support, hanging baskets and ancillary products;
- Compost and gravels, aggregates and other garden landscaping sundries;
- Fencing, trellis, gates and other associated products (landscaping materials);
- Fertilizer and chemicals;
- Garden and outdoor clothing and footwear, toolbelts, gloves and needlers etc.;
- Garden buildings, sheds, sun houses and outdoor play equipment;
- Outdoor garden furniture;
- Outdoor aquatics and water garden equipment and their accessories;
- Outdoor spas and pools;
- Barbeques and their accessories;
- Garden equipment, mowers, garden machinery, hand tools and accessories;
- Bird and wildlife care products, hedgehog houses, bat boxes, bird feed, bird tables;
- Wood preservatives and other treatments necessary for the maintenance of garden furniture.

AREA 3 (DESIGNATED BUILDINGS)

- Garden furniture;
- Conservatory and interior furniture;
- Indoor aquatics, pet products and accessories;
- Toys and crafts;
- Regional produce;
- Baskets, wicker work and country crafts;
- Home and kitchen accessories, freestanding kitchen furniture;
- Giftware;
- Stationary and books;
- Original artwork and prints;
- Fabric cushions, soft furnishings, ornamental rugs, floor coverings and accessories;
- Garden games;
- Country and outdoor clothing, footwear accessories, camping and outdoor pursuit products;
- Christmas decorations, trees and gifts;
- China, glass and gifts;
- Jewellery;
- Conservatories.



SHACKLETONS, CLITHEROE ROAD, CHATBURN

 Do not scale from this plan

APPENDIX 2

Council's Response to the Pre-Application Enquiry dated 21 October 2019

RIBBLE VALLEY BOROUGH COUNCIL

Officer:	Adam Birkett	**Direct Tel:**	01200 414751	**Council Offices Church Walk Clitheroe Lancashire BB7 2RA**	
Email:	adam.birkett@ribblevalley.gov.uk				
Our Ref:	RV/2019/ENQ/00092				
Site Location:	Shackletons Home & garden Centre, Clitheroe Road, Chatburn			Tel: 01200 425111	Fax: 01200 414487
Proposal:	Proposed alterations and extension of existing home and garden centre including additional indoor and outdoor retail. Relocation and increase in the area of existing A3 usage.				
Date:	21 October 2019				

Pre-Application Enquiry Response

Dear Dan,

I write further to your submission of a request for pre-application advice at Shackletons Home & garden Centre, Clitheroe Road, Chatburn on behalf Mr David Shackleton. The enquiry seeks the Council's views on proposed alterations and extension to the existing home and garden centre including additional indoor and outdoor retail for the sale of associated furniture and plants and relocation and increase in the area of existing A3 usage.

The garden centre is located in an area designated as open countryside between the settlements of Clitheroe and Chatburn. The application site has a lengthy planning history and the garden centre business is required to operate in strict accordance with the requirements of the Section 106 legal agreement which was agreed alongside determination of planning applications 3/2005/0999 and 3/2005/1000 which sought to increase opening hours of the café and increase the range of goods for sale to include homeware, gifts and indoor fish and varied alongside planning application 3/2010/0378 which granted consent for an aquatics building.

Relevant Core Strategy Policies:

Ribble Valley Core Strategy:

- Key Statement DS1 – Development Strategy
- Key Statement DS2 – Sustainable Development
- Key Statement EN2 – Landscape
- Key Statement EN4 – Biodiversity and Geodiversity
- Key Statement EC1 – Business and Employment Development
- Key Statement EC2 – Development of Retail, Shops and Community Facilities and Services
- Policy DMG1 – General Considerations
- Policy DMG2 – Strategic Considerations
- Policy DMG3 – Transport and Mobility
- Policy DME1 – Protecting Trees and Woodlands
- Policy DME2 – Landscape and Townscape Protection
- Policy DME3 – Site and Species Protection and Conservation
- Policy DME6 – Water Management
- Policy DMB1 – Supporting Business Growth and the Local Economy

- Policy DMR3 – Retail Outside the Main Settlements
- National Planning Policy Framework (NPPF)

Principle of Development:

Core Strategy Key Statement EC1 (Business and Employment Development) is relevant in the consideration of this proposal. Employment development is directed towards the main settlements of Clitheroe, Whalley and Longridge together with land at Barrow Enterprise Site, the Lancashire Enterprise Zone at Samlesbury and locations well related to the A59 corridor. Key Statement EC1 also supports the expansion of existing businesses. Policy DMB1 (Supporting Business Growth and the Local Economy) states that "*Proposals that are intended to support business growth and the local economy will be supported in principle*". Whilst Key Statement EC1 and Policy DMB1 relate primarily to traditional employment development (Use Classes B1, B2 and B8) it is acknowledged that the proposals would generate some employment opportunities and has good access to the A59 corridor.

The site is located in the open countryside. Core Strategy Policy DMG2 requires development in the open countryside to meet one of six considerations including that the development is "essential to the local economy". There would be a requirement to demonstrate the economic benefits arising from the development proposals to ensure it complies with Policy DMG2 of the Core Strategy.

In respect of retail policies, Key Statement DS1 of the Ribble Valley Core Strategy sets out that new retail and leisure development will be directed towards the centres of Clitheroe, Longridge and Whalley. Key Statement EC2 takes a similar approach by promoting the national policy principle of town centre first for retail.

Policy DMR1 of the Ribble Valley Core Strategy identifies that Clitheroe is the only part of the borough considered to be suitable and capable of accommodating major retail development, before stating that retail development outside the main shopping centre of Clitheroe will be considered on a sequential basis, with proposals for more than 1,000sqm requiring a retail impact assessment. The table contained at paragraph 3.4 of the Pre-application Statement identifies a proposed floorspace increase of 1,698sqm (+1,372sqm of A1 (Shops) and +326 of A3 (Restaurants and Cafes)).

In respect of national policy, national guidance within the NPPF is relevant. Annex 2 of the NPPF confirms that retail development is a main town centre uses and Paragraph 24 of the NPPF 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."

In view of the above, taking into account the site's proximity to the principal settlement of Clitheroe and the proposed increase in floorspace for main town centre uses any submission of a formal planning application must be accompanied by a sequential test analysis and a Retail Impact Assessment in relation to Clitheroe to be carried out in accordance with National Planning Policy Guidance. The sequential and impact tests must be satisfied to demonstrate that there a no sequentially preferable sites that are suitable, viable and available for the proposed use and to assess the impact of the proposals on the viability and vitality of Clitheroe town centre.

Reference is made within the Pre-Application Statement to consent previously granted for the erection of an aquatics building at the site. The most recent application relating to this building is planning application 3/2013/0776 which sought to renew permission granted under application 3/2010/0378 to provide 375sqm of additional floorspace which was approved subject to variation of the existing legal agreement. Notwithstanding the previous consent (which I understand the applicant contends remains extant by virtue of the development having commenced) the development now proposed differs considerably in terms of its scale and use.

The proposal would result in an approximately equal split of internal floorspace areas used for the sale of garden and garden related products and areas identified for the retail sale of other goods. Taking into account the proposed café and play area the proposals would result in the 'garden centre' floorspace area becoming the lesser use at the site when all previous efforts have been made to ensure that the primary use as a garden centre for the sale of garden and landscape products is protected and remains the dominant element of the business.

It is considered that the proposals would materially alter the character of the use which occupies a countryside location and the proposed retail use is of an extent which is considered independent of the primary 'garden centre' use carried out on the site. Any potential positive outcome would be conditional upon retail sales being restricted taking into account the specific requirements of the business and also the Local Planning Authority's requirement as enshrined within local and national planning policy to protect the vitality and viability of town centres. The most appropriate mechanism to secure this is considered to be via a legal agreement and could be achieved through a new Section 106 agreement to cover the entire site. As such it is recommended that any formal planning application be submitted with a draft legal agreement which should be accompanied by a site plan to define the various retail areas within the buildings and the range of goods to be sold within areas similar to previous legal agreements at the site.

Consideration must also be given to the extent to which the proposed café and play area could be deemed 'ancillary' in nature to the garden centre given the café would approximately treble in size compared with the existing and the introduction of a play area would present an additional element that would contribute to the cafés appeal as a destination in its own right such that if would require separate planning consent. It would be for the applicant to demonstrate in any future planning application that the proposed café and play area would remain as an ancillary function to the main use of the site.

Design, Layout & Visual Impact:

The proposed extensions would repeat the existing stepped approach up the site (to the south-east). The extensions would be to the rear of the existing buildings when viewed from Clitheroe Road and given the change in levels the development would incorporate slopes/ramps throughout internal areas and would require retaining walls to the south-east extent. When viewed from Clitheroe Road the proposed extensions would not result in a significant increase in bulk or prominence and the proposed extensions would be set back from the boundary with Worston Road providing suitable relief.

It is recommended that the height of the proposed buildings should be minimised and should respect the height of the existing s at the site. The proposed materials comprising natural stone and aluminium framed glazing are considered to be appropriate.

The proposal also seeks to expand the existing customer parking area and provide a new servicing/deliveries area on an area of agricultural land to the south-east of the site measuring approximately 0.8 hectares in size. The land adjoins the existing car park and yard area to the south-east for the entire length of the site. It is acknowledged that planning consent was granted under permission 3/2018/0025 for an extension of the car park onto the same area of land subject to a scheme of landscaping which retained and maintained existing trees and proposed additional hedgerow and tree planting.

The proposed expansion of customer parking differs to the previously approved scheme in terms of its layout and landscaping proposals. A landscape buffer is proposed to the Clitheroe Road frontage to the east of the main entrance and tree lined pathways created between parking bays to split up the expanse of tarmac surfacing. The existing boundary hedge to the south-east of the site would be relocated to define the new south-eastern boundary. The majority of the existing trees at the site would be retained although there would be a requirement to remove a single ash tree. At the time of writing I await a written response from the Council's Countryside Officer and shall provide this in due course.

There would be a requirement for an updated ecology assessment to be provided with any formal planning application to determine the suitability of existing buildings or trees for habitation/roosting by protected species and to assess the impact that the proposals could have on protected species including any impact arising from lighting or intersection of flight paths/foraging routes.

Other Matters:
It is not considered that the proposals would impact negatively on the residential amenity of nearby occupiers. The application site is located opposite Pendle Trading Estate which contains a variety of industrial type uses that would likely generate considerably more noise and disturbance than the proposed use.

Conclusion:
Taking into account all of the above, the principle of development in this location cannot be considered acceptable unless the sequential and impact tests are satisfied and it is demonstrated that there are no sequentially preferable sites that are suitable, viable and available for the proposed use and that the proposals would not significantly impact on the viability and vitality of Clitheroe town centre. The Council also retains concerns relating to the loss of the sites identity as a garden centre by virtue of the increase in non-garden related retail and café and play area floor space.

Submission Requirements:
Should you proceed to submission of a formal application, based on the nature of the proposal/site constraints identified above, it is my opinion that the Local Planning Authority would require the following information to accompany such an application:

- Application forms
- Location plan
- Site plan (existing and proposed)
- Sections and levels (informed by a topographical survey)
- Elevations and floor plans (existing and proposed)
- Planning Statement
- Design and Access Statement
- Sequential Assessment and Impact Test
- Arboricultural Impact Assessment
- Heads of Terms/Draft legal agreement
- Transport Assessment/Travel Plan
- Landscaping proposals
- External lighting proposals
- Car parking layout
- Ecological/biodiversity Assessment

Please note this aforementioned required information may not be exhaustive and is provided on the basis of the level of information submitted. Failure to provide required information is likely to result in an application being made invalid until such information is received or potentially refused on the basis of insufficient information.

Please also be advised that Lancashire County Council provide a separate, chargeable pre-application service for highway related matters. You should contact the County Council directly to discuss any such issues - https://www.lancashire.gov.uk/business/business-services/pre-planning-application-advice-service/pre-planning-application-highways-advice-service

The above observations have been provided on the basis of the level of information submitted and the comments contained within this response represent officer opinion only, at the time of writing, without prejudice to the final determination of any application submitted. Should you wish to discuss any of these matters further please do not hesitate to contact me.

Yours Sincerely

Adam Birkett
Principal Planning Officer
adam.birkett@ribblevalley.gov.uk

APPENDIX 3

Note on the Scope of Work for the Retail Impact Assessment

PROPOSED DEVELOPMENT AT SHACKLETONS HOME AND GARDEN CLITHEROE ROAD, CHATBURN, CLITHEROE, BB7 4JY

RETAIL ASSESSMENT – PROPOSED SCOPE OF WORK

Introduction

1. Shackletons Home and Garden is, for the purposes of prevailing planning policies, in an out-of-centre location. A planning application for additional retail development is required to demonstrate compliance with the sequential approach to site selection (the sequential test) and that the proposal would not undermine investment in a town centre or otherwise undermine the vtality and viability of a town centre (the impact test).

2. This note has been prepaed to seek agreement wth the Local Planning Authority on the scope of work required to address the sequential and impact tests.

Proposed Development

3. The Proposal is outlined in the pre-application enquiry submitted to the Council by PWA Planning dated July 2019.

Use	Existing Area (sqm)	Proposed Area (sqm)	Change (sqm)
Outdoor Furniture Sales	860	1,310	+450
Indoor Furniture Sales	1,610	2,540	+930
Cafe	162	420	+258
Greenhouse / outdoor plant sales	990	980	-10
Kitchen Furniture Sales	105	162	+57
Potting Shed	200	200	
Sundries	315	410	+95
Back of House {Kitchen, Toilets etc.)	115	375	+260
Play Area		143	+143
Total Area	**4,357**	**6,540**	**+2,183**
Total Sales {A1 Use Class)	**4,080**	**5,602**	**+1,522**
Total Sales {A3 Use Class)	**162**	**420**	**+258**

4. The increase in retail floorspace (Use Class A1) is 1,522 square metres net floorspace that would predominantly be used for the sale of furniture: 930 square metres for outdoor furniture and 450 square metres for indoor furniture. There would be a small increase in the sale of sundries (95 square metres) and kitchen furniture (57 square metres).

5. The addditional floorspace at Shackletons can be characterised as being for furniture sales, a significant element being for garden furniture, in a garden centre setting.

Summary of the Planning Policy Context

6. The Development Plan comprises the Ribble Valley Core Strategy (2014). The most relevant policies to retail matters are:

- Key Statement DS1 of the Ribble Valley Core Strategy sets out that new retail development will be directed towards the centres of Clitheroe, Longridge and Whalley;

- Key Statement EC2 dirests new development to the existing centre heirarchy and identifies a need for additional retail development over the plan period at Clitheroe;

- Policy DMR1 encourages retail development at Clitheroe Town Centre and states that it is the only part of the Borough considered to be suitable and capable of accommodating major retail development. For proposals outside the main shopping area the policy requires the sequential test to be engaged. Proposals of more than 1,000 square metres gross floorspace are required to be accompanied by a retail impact assessment (the applcation would exceed this threshold);

7. Core Strategy Policy DMR3: Retail Outside the Main Settlements is concerned with the loss shopping provision in rural areas and the development of farm shops. It is not of direct relevance to the Proposal.

8. Section 7 of the National Planning Policy Framework ("NPPF") is concerned with retail development and town centres. For the sequential test, locating development within town centres is the preferred option, followed by edge-of-centre sites and then out of centre locations. Paragrapgh 87 states that flexibility on issues such as format and scale should be addressed so that opportunities to utilise town or edge of centre sites are fully expolored. The Planning Practice Guidance ("PPG") indicates that the onus is on the applicant to demonstrate compliance with the test. It also indicates that the sequential assessmnt should be proportionate and appropriate to the proposal[1].

9. The key points arising from case law and decisions by the Secretary of State[2] are:

- A sequential assessment should consider the specific question of whether "the application" can be accommodated on alternative sequentially preferable locations.

- That the suitability of alternative sites should be assessed having regard to the nature of the application.

- In considering suitability, the facts and circumstances of each particular case will determine the bounds that may be set in respect of flexibility of format and scale. However, an alternative site must be able to accommodate a development that is similar to the application.

[1] Paragraph: 011 Reference ID: 2b-011-20190722
[2] A schedule of relevant case law and decisions is annexed to this note.

- Whilst the preference of a single operator should not justify rejecting alternative sites, nevertheless the developer's intentions are relevant to the consideration of alternatives and the assessment should have regard to "real world" considerations.

- There is no requirement to disaggregate a proposal into components in order to consider whether elements of a scheme can be accommodated on a number of smaller sites.

10. The sequential test provides provides an approach to accommodate new development. It does not set any in-principle presumption against development in out-of-centre locations in cirumstances where there is no suitable site available in a sequentially preferable location.

11. NPPF paragraph 89 states that the impact test applies to proposals over 2,500 square metres gross floorspace, unless there is a locally set impact threshold. In this case there is a local threshold of 1,000 square metres. Parargraph 89 states that an assessment should consider two matters: the impact of the proposal on investment within a centre; and the impact on town centre vitality and viability. The PPG indicates that it is for the applicant to demonstrate compliance with the impact test and that it shoul be undertaken in a proportionate and locally appropriate way drawing on existing information where possible. It adds that ideally, applicants and local planning authorities should seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted[3]. The PPG then provides a checklist identifying the steps to be taken in applying the impact test[4]. Case law has established that the content of an impact assessment is a matter of judgement, that the PPG provides guidance only and is not mandatory[5].

The Sequential Test

12. In light of the policy context, location of Shackletons and the area that the development would serve, the (only) town centre relevant for the purposes of a sequential assessment is Clitheroe.

13. As the proposal is to enlarge and reconfigure the existing garden centre, for the purposes of the sequential assessment, taking account of flexibilty in format and scale, the assessment should consider whether there is a suitable site available to accommodate Shackletons as proposed to be extended.

14. Shackletons requirement is for:

- a site of approximately 2.5 hectares[6] to accommodate a building of approximately 5,560 square metres (not necessarily all on one level), and an area for a greenhouse and external display of goods of circa 980 square metres;

- the site needs to have the ability to provide car parking for about 240 cars, at surface level adjacent to the main building and a configuration that enables bulky goods such as funiture and gardening goods such as compost to be transferred conveniently from the store to a car; and

[3] Paragraph: 017 Reference ID: 2b-017-20190722
[4] Paragraph: 018 Reference ID: 2b-018-20190722
[5] Solo Retail Limited v Torridge District Council [2019] EWHC 489 (Admin)
[6] The current Shackletons site is approximately 2.5 hectares.

- a location and site that can be serviced by large articulated vehicles.

15. The sequential assessment should seek an alternative site of a scale, location and configuration to meet Shackletons requirement or similar.

The Impact Test

16. Having regard to PPG guidance[7], existing information on shopping patterns and the health of centres is the Ribble Valley Retail Study Update June 2013[8] and the Ribble Valley Service Centre Health Checks 2018 produced by the Council in August 2018.

17. The Ribble Valley Retail Study provides evidence of existing patterns of shopping and provides a basis for the impact analysis. Zones 1 (Forest of Bowland Rural Area), 2 (Clitheroe Area) and 3 (Whalley Area) comprise an appropritate area on which to undertake the impact assessment. Whilst Shackletons will attract trade from outside of this area trade draw from any specific area and trade diversions will be diffuse.

18. For the purposes of the impact assessment, the Service Centre Healthcheck provides an up-to-date assessment of the health of Clitheroe Town Centre.

19. The appropriate timeframe for assessing impact is a five year period 2020 to 2025[9].

20. For the purposes of the impact analysis, the Ribble Valley Retail Study provides the basis to assess the "no-development" scenario. Expenditure data will be up-dated using information from Experian Retail Planner Briefing Note 16 (December 2018)[10]. Population estimates for each zone will be updated using 2016 based ONS subnational projections for England. Account will be taken of any retail commitments that are material to the impact assessment.

21. The turnover of the proposed addditional floorspace will be informed by data from Retail Rankings on the performance of garden centre operators and furniture retailers. Trade draw will be informed by the distributon of population/expenditure beween the survey zones. Shackletons will provide guidance as to the proportion of turnover derived from outside the locality.

22. A range of plausible scenarios will be addressed having regard to advice that the impact assessement should be proportionate and locally appropriate. Any plausible scenarios will be identified during the course of work on the impact assessment and may include consideration of a higher scheme turnover and/or alternative trade draw assumptions.

23. Estimates of the diversion of trade will be based on the "no development" scenario applying a weighting to acount for "like impacting on like"[11]. In the context of "like" facilities, the proposal is likely to draw trade from existing garden centres and furniture retailers in the first instance.

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[7] Paragraph: 017 Reference ID: 2b-017-20190722
[8] Nathaniel Lichfield & Partners
[9] This timeframe takes account of the planning application being determined in 2020.
[10] Or Briefing Note 17 should it became available prior to the impact assessment being undertaken.
[11] The PPG advises that as a guiding principle, impact should be assessed on a like-for-like basis in respect of that sector - paragraph: 015 Reference ID: 2b-015-20190722

24. In drawing conculsions on the likely impact arising from the proposal, Clitheroe Town Centre is the most important centre to consider. It is unlikely, adopting a proportionate approach that, any other town centre will be affected materially.

Information Required from the Local Planning Authority

25. Information required from the Council is:

- Information on recent retail development and outstanding retail commitments. Adopting a proportionate approach information should be confined to developments over 500 square metres gross floorspace.

- Information on any recent or planned town centre investments in Clitheroe.

Alyn Nicholls BA(Hons) MRTPI
24 November 2019

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ANNEX

SCHEDULE OF RELEVANT CASE LAW AND DECISIONS

Case Law:

- Tesco Stores Limited v Dundee City Council (Scotland) (2012) UKSC 13, 21 March 2012)
- R. [on the application of Zurich Assurance Limited trading as Threadneedle Property Investment] v North Lincolnshire Council and Simon Developments Limited [2012] EWHC 3708 [Admin].
- Aldergate Properties Limited v Mansfield District Council [2016] EWHC 1670 (Admin)
- Warners Retail (Moreton) Limited v Cotswold District Council [2016] EWCA Civ 606
- Solo Retail Limited v Torridge District Council [2019] EWHC 489 (Admin)

Decisions:

- Land adjacent to Skew Bridge Ski Slope, Northampton Road, Rushden, “called-in” application decision dated 11 June 2014 (reference APP/G2815/V/12/2190175).
- Land at Scotch Corner, North Yorkshire, "called-in" application decision dated 1 December 2016 (reference APP/V2723/V/15/3132873 and 16/3143678).
- Land north of Ashcombe Road and Barnes Way, Kingswood, Hull appeal decision dated 20 December 2017 (reference APP/V2004/W/17/3171115).
- The Mall, Cribbs Causeway, Bristol, "called-in" application decision dated 1 October 2018 (reference APP/P0119/V/17/3170627)

APPENDIX 4

The Council's Responses to the Scoping Note

From: Rebecca Turner <Rebecca.Turner@ribblevalley.gov.uk>
Sent: 10 December 2019 14:50
To: Gemma Newall <Gemma.Newall@pwaplanning.co.uk>
Subject: FW: Retail Proposals

Hi Gemma, further to your enquiry please find below information which I trust will be of assistance,

- Information on recent retail development and outstanding retail commitments. Adopting a proportionate approach information should be confined to developments over 500 square metres gross floor-space;

From our retail monitoring the following site is one that reference should be made in the assessment even though it is below the 500m threshold as it will be introducing new floor-space to the town centre which in a Ribble Valley context is of significance.

44-46 King Street Clitheroe	3/2017/1002	Change of use from hotel & restaurant to ground floor & basement retail outlet	0.027	273	A1

The attached excel file contains information on other sites although at this stage it is not complete in terms of commencement and completion dates but it will give you an indication of recent activity.

- Information on any recent or planned town centre investments in Clitheroe.

The Councils Market Area Redevelopment project was pulled last September, although the site area remains as a policy in the in the Housing and Economic Development DPD. There maybe other proposals that we are unaware of at this stage.

If you want to discuss the information please do not hesitate to get in touch with myself or Colin.

Rebecca Turner

Planning Policy Assistant

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Economic Development and Planning, Ribble Valley Borough Council

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Web: **www.ribblevalley.gov.uk**

From: Adam Birkett <Adam.Birkett@ribblevalley.gov.uk>
Sent: 17 December 2019 14:59
To: Gemma Newall <Gemma.Newall@pwaplanning.co.uk>
Cc: Colin Hirst <Colin.Hirst@ribblevalley.gov.uk>
Subject: RE: Shackletons - Scope of the Sequential Test and Retail Impact Assessment

Gemma,

For information I refer you to planning application 3/2018/0274 which was accompanied by a sequential test and impact assessment for out-of-centre retail.

Garden centres represent specialist destinations and regard must be had to the level of competitor garden centres operating in the local area together with the accessibility of the subject site. This would provide a helpful basis for estimating the anticipated catchment area but this would undoubtedly include the town centre of Clitheroe.

Regards

From: Gemma Newall <Gemma.Newall@pwaplanning.co.uk>
Sent: 17 December 2019 14:36
To: Adam Birkett <Adam.Birkett@ribblevalley.gov.uk>
Subject: Shackletons - Scope of the Sequential Test and Retail Impact Assessment
Importance: High

Adam,

Your policy colleagues have been helpful in providing the required information in relation to the retail impact assessment. Please can you provide comment at your earliest convenience on the scope of the assessment in order for us to ensure that we provide the correct information?

Many thanks

Kind regards

Gemma

Gemma Newall BSc, PgDip, MRTPI | Senior Planner

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APPENDIX 5

Economic Impact Tables

TABLE 1

Population				
	Zone 1 Forest of Bowland	*Zone 2 Clitheroe Area*	*Zone 3 Whalley Area*	*Total Study Area*
2020	8,200	15,300	27,750	*51,250*
2025	8,650	16,200	29,400	*54,250*

Notes:

Population estimates are derived from the WYG Retail Assessment for the Barrow Brook Retail Proposal (planning application reference 3/2018/0274)

TABLE 2

Per Capita Expenditure Comparison Goods			
	Zone 1 Forest of Bowland	*Zone 2 Clitheroe Area*	*Zone 3 Whalley Area*
2020	£4,314	£3,268	£3,242
2025	£4,498	£3,407	£3,380

Notes:

Source of original data is WYG Retail Assessment for the Barrow Brook Retail Proposal (planning application reference 3/2018/0274), updated to a 2017 price base.

Growth per annum in per capita expenditure on comparison goods is 2018: 3.4%; 2019: 3.0%; 2020: 0.0% and from 2021 to 2024: 3.2% (from Figures 1a and 1b of Experian Retail Planner Briefing Note 17 February 2020). However, it has been assumed that growth for 2020 is 0% because of the impact of Covid-19 and lockdown.

Special forms of trading (SFT) for comparison goods is 18.4% at 2020 and 25% at 2025 (based on Figure 5. Experian Retail Planner Briefing Note 17, February 2020). However the Experian figure for 2025 is 22%. It has been assumed that following Covid-19, on-line retailing will remain at a higher level that projected in February 2020.

2017 Prices

TABLE 3

Available Expenditure on Comparison Goods (£m)				
	Zone 1 Forest of Bowland	*Zone 2 Clitheroe Area*	*Zone 3 Whalley Area*	*Total Study Area*
2020	£35.38	£50.00	£89.97	*£175.34*
2025	£38.91	£55.19	£99.37	*£193.47*
Growth: 2019-2024	£3.53	£5.19	£9.40	*£18.12*

Notes:

Per capita expenditure on comparison goods from Table 2 is applied to population estimates in Table 1

2017 Prices

TABLE 4

Market Shares in Comparison Expenditure by Zone (%)

	Zone 1 *Forest of Bowland*	*Zone 2* *Clitheroe Area*	*Zone 3* *Whalley Area*	*Whole Study Area*
Clitheroe Town centre	47.3%	38.9%	17.5%	29.6%
Longridge Town centre	0.1%	0.0%	0.3%	0.2%
Whalley town centre	0.8%	0.4%	0.9%	0.7%
Colne Town Centre	2.7%	0.4%	0.8%	1.1%
Nelson Town Centre	0.9%	0.0%	0.0%	0.2%
Burnley Town Centre	2.9%	4.1%	5.6%	4.6%
Accrington Town Centre	2.5%	1.4%	8.2%	5.1%
Blackburn Town centre	9.9%	18.4%	29.7%	22.5%
Preston City Centre	4.3%	4.9%	4.9%	4.8%
Deepdale Retail park	0.4%	1.0%	0.3%	0.5%
Skipton Town Centre	3.3%	1.0%	1.0%	1.5%
Manchester City Centre	3.6%	5.1%	3.0%	3.7%
Trafford Centre	0.4%	1.2%	0.6%	0.7%
Other	20.9%	23.3%	27.2%	24.9%
Total	100.0%	100.0%	100.0%	100.1%

Notes:
Market shares are derived from the household telephone survey forming part of the Ribble Valley Retail Study Update (Nathanial Lichfield & Partners, 2013)
2017 Prices

TABLE 5

Distribution of Comparison Expenditure by Value 2020 (£m)				
	Zone 1 Forest of Bowland	***Zone 2 Clitheroe Area***	***Zone 3 Whalley Area***	***Total Study Area***
Clitheroe Town centre	£16.73	£19.43	£15.77	£51.93
Longridge Town centre	£0.02	£0.00	£0.31	£0.32
Whalley town centre	£0.29	£0.20	£0.81	£1.31
Colne Town Centre	£0.95	£0.20	£0.74	£1.89
Nelson Town Centre	£0.32	£0.00	£0.00	£0.32
Burnley Town Centre	£1.03	£2.05	£5.00	£8.08
Accrington Town Centre	£0.90	£0.70	£7.35	£8.95
Blackburn Town centre	£3.50	£9.18	£26.71	£39.38
Preston City Centre	£1.53	£2.46	£4.41	£8.40
Deepdale Retail park	£0.15	£0.51	£0.27	£0.92
Skipton Town Centre	£1.15	£0.50	£0.90	£2.55
Manchester City Centre	£1.28	£2.55	£2.66	£6.48
Trafford Centre	£0.15	£0.59	£0.54	£1.28
Other	£7.38	£11.63	£24.50	£43.51
Total	**£63.38**	**£88.36**	**£155.43**	**£307.17**

Notes:

Distribution of expnenditure is the estimates of comparison expenditure in each zone applied to the market

2017 Prices

TABLE 6

Turnover of Significant Retail Commitments	Gross area (sqm)	Net to gross ratio	Total net area (sqm)	Net area comparison goods %	Net area comparison goods (sqm)	Sales density (£ per sqm)	Turnover (£m)
Former Barkers Garden Centre Whalley Road, Clitheroe (Aldi)	2,161	85%	1,837	20%	367	£7,500	£2.76
Victoria Hotel, 1 Market Place, Clitheroe (Fat Face)	315	75%	236	100%	236	£4,500	£1.06
Unit 3-5 Deanfield Drive, Clitheroe (Beaconfell Bikes)	449	50%	225	100%	225	£4,500	£1.01
Holmes Mill, Greenacre Street, Clitheroe	895	70%	627	100%	627	£4,500	£2.82
Land at Barrow Brook Enterprise Park, North Road, Barrow	1,380	85%	1,173	100%	1,173	£3,750	£4.40

Notes:

2017 Prices

TABLE 7

Trade Draw of Commitments	*Zone 1 Forest of Bowland*	*Zone 2 Clitheroe Area*	*Zone 3 Whalley Area*	*Elsewhere*	*Total*
Former Barkers Garden Centre Whalley Road, Clitheroe (Aldi)					
Trade Draw %	29.0%	35.0%	26.0%	10.0%	100.0%
Trade Draw (£m)	£0.80	£0.96	£0.72	£0.28	£2.76
Victoria Hotel, 1 Market Place, Clitheroe (Fat Face)					
Trade Draw %	26.0%	30.0%	24.0%	20.0%	100.0%
Trade Draw (£m)	£0.28	£0.32	£0.26	£0.21	£1.06
Unit 3-5 Deanfield Drive, Clitheroe (Beaconfell Bikes)					
Trade Draw %	23.0%	26.0%	21.0%	30.0%	100.0%
Trade Draw (£m)	£0.23	£0.26	£0.21	£0.30	£1.01
Holmes Mill, Greenacre Street, Clitheroe					
Trade Draw %	26.0%	30.0%	24.0%	20.0%	100.0%
Trade Draw (£m)	£0.73	£0.85	£0.68	£0.56	£2.82
Land at Barrow Brook Enterprise Park, North Road, Barrow					
Trade Draw %	20.0%	25.0%	15.0%	40.0%	100.0%
Trade Draw (£m)	£0.88	£1.10	£0.66	£1.76	£4.40

Notes:

2017 Prices

TABLE 8

Comparison Trade Diversions and Impacts Arising from Commitments (2025)

	Comparison turnover (£m) (no development)		*Former Barkers Garden Centre Whalley Road, Clitheroe (Aldi)*			*Victoria Hotel, 1 Market Place, Clitheroe (Fat Face)*				
	2020	*2025*	*Diversion*	*Impact*	*Turnover following*	*Solus diversion*	*Solus impact*	*Cumulative diversion*	*Cumulative impact*	*Turnover following*
Clitheroe Town centre	£64.91	£71.58	-£0.81	-1.1%	£70.78	£0.81	1.1%	£0.00	0.0%	£71.58
Longridge Town centre	£10.40	£11.47	-£0.04	-0.3%	£11.43	£0.00	0.0%	-£0.04	-0.3%	£11.43
Whalley town centre	£4.60	£5.07	-£0.01	-0.2%	£5.06	£0.00	0.0%	-£0.01	-0.2%	£5.06
Colne Town Centre	£66.00	£72.78	-£0.02	0.0%	£72.76	£0.00	0.0%	-£0.02	0.0%	£72.76
Nelson Town Centre	£85.00	£93.73	£0.00	0.0%	£93.73	£0.00	0.0%	£0.00	0.0%	£93.73
Burnley Town Centre	£180.00	£198.49	-£0.04	0.0%	£198.45	-£0.02	0.0%	-£0.07	0.0%	£198.43
Accrington Town Centre	£57.00	£62.86	-£0.07	-0.1%	£62.78	-£0.05	-0.1%	-£0.12	-0.2%	£62.74
Blackburn Town centre	£206.00	£227.16	-£0.70	-0.3%	£226.46	-£0.27	-0.1%	-£0.98	-0.4%	£226.19
Preston City Centre	£370.00	£408.01	-£0.18	0.0%	£407.83	-£0.09	0.0%	-£0.28	-0.1%	£407.73
Deepdale Retail park	£175.00	£192.98	-£0.01	0.0%	£192.97	-£0.01	0.0%	-£0.02	0.0%	£192.96
Skipton Town Centre			-£0.03		-£0.03	-£0.03		-£0.07		
Manchester City Centre			-£0.08		-£0.08	-£0.05		-£0.13		
Trafford Centre			-£0.01		-£0.01	-£0.03		-£0.04		
Other			-£0.75			-£0.25		-£1.00		
Commitments										
Former Barkers Garden Centre Whalley Road, Clitheroe (Aldi)					£2.76	£0.00	0.0%			£2.76
Totals			-£2.76			£0.00				

Notes

The trade diversion from Clitheroe Town Centre arising from the Victoria Hotel development (Fat Face) is the net effect allowing for trade diversion from existing shops and the development contributiong to the overall townover of the Town Centre.

2017 Prices

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TABLE 8 (continued)

Comparison Trade Diversions and Impacts Arising from Commitments (2025) (Continued)

	Unit 3-5 Deanfield Drive, Clitheroe (Beaconfell Bikes)					***Holmes Mill, Greenacre Street, Clitheroe***				
	Solus diversion	*Solus impact*	*Cumulative diversion*	*Cumulative impact*	*Turnover following*	*Solus diversion*	*Solus impact*	*Cumulative diversion*	*Cumulative impact*	*Turnover following*
Clitheroe Town centre	-£0.09	-0.1%	-£0.09	-0.1%	£71.49	-£0.40	-0.6%	-£0.49	-0.7%	£71.09
Longridge Town centre	£0.00	0.0%	-£0.04	-0.3%	£11.43	£0.00	0.0%	-£0.04	-0.3%	£11.43
Whalley town centre	£0.00	0.0%	-£0.01	-0.2%	£5.06	£0.00	-0.1%	-£0.01	-0.2%	£5.06
Colne Town Centre	£0.00	0.0%	-£0.02	0.0%	£72.76	-£0.01	0.0%	-£0.03	0.0%	£72.75
Nelson Town Centre	£0.00	0.0%	£0.00	0.0%	£93.73	-£0.07	-0.1%	-£0.08	-0.1%	£93.65
Burnley Town Centre	-£0.01	0.0%	-£0.07	0.0%	£198.42	-£0.09	0.0%	-£0.16	-0.1%	£198.33
Accrington Town Centre	-£0.02	0.0%	-£0.14	-0.2%	£62.72	-£0.08	-0.1%	-£0.21	-0.3%	£62.64
Blackburn Town centre	-£0.08	0.0%	-£1.06	-0.5%	£226.10	-£0.71	-0.3%	-£1.77	-0.8%	£225.39
Preston City Centre	-£0.10	0.0%	-£0.38	-0.1%	£407.64	-£0.22	-0.1%	-£0.59	-0.1%	£407.42
Deepdale Retail park	£0.00	0.0%	-£0.02	0.0%	£192.96	-£0.01	0.0%	-£0.03	0.0%	£192.95
Skipton Town Centre	£0.00		-£0.07			-£0.04		-£0.11		
Manchester City Centre	£0.00		-£0.13			-£0.20		-£0.33		
Trafford Centre	£0.00		-£0.04			-£0.09		-£0.14		
Other	-£0.70		-£1.70			-£0.88		-£2.57		
Commitments										
Former Barkers Garden Centre Whalley Road, Clitheroe (Aldi)	£0.00	0.0%	£0.00	0.0%	£2.76	-£0.02	-0.6%	-£0.02	-0.6%	£2.74
Unit 3-5 Deanfield Drive, Clitheroe (Beaconfell Bikes)					£1.01	£0.00	0.0%			£1.01
Holmes Mill, Greenacre Street, Clitheroe										£2.82
Totals	-£1.01					-£2.82				

Notes:

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Proposed Development at Shackletons Garden Centre
Clitheroe Road, Chatburn

TABLE 8 (continued)

Comparison Trade Diversions and Impacts Arising from Commitments (2025) (Continued)

	Land at Barrow Brook Enterprise Park, North Road, Barrow				
	Solus diversion	*Solus impact*	*Cumulative diversion*	*Cumulative impact*	*Turnover following*
Clitheroe Town centre	-£1.40	-2.0%	-£1.40	-2.0%	£69.69
Longridge Town centre	£0.00	0.0%	-£0.04	-0.3%	£11.43
Whalley town centre	£0.00	0.0%	-£0.01	-0.2%	£5.06
Colne Town Centre	£0.00	0.0%	-£0.02	0.0%	£72.75
Nelson Town Centre	£0.00	0.0%	£0.00	0.0%	£93.65
Burnley Town Centre	£0.00	0.0%	-£0.07	0.0%	£198.33
Accrington Town Centre	-£0.35	-0.6%	-£0.47	-0.7%	£62.30
Blackburn Town centre	-£0.57	-0.3%	-£1.54	-0.7%	£224.82
Preston City Centre	-£0.36	-0.1%	-£0.64	-0.2%	£407.06
Deepdale Retail park	£0.00	0.0%	-£0.02	0.0%	£192.94
Skipton Town Centre	-£0.01		-£0.08		
Manchester City Centre	-£0.06		-£0.19		
Trafford Centre	-£0.01		-£0.05		
Other	-£1.62		-£2.61		
Commitments					
Former Barkers Garden Centre Whalley Road, Clitheroe (Aldi)	£0.00	0.0%	£0.00	0.0%	£2.74
Unit 3-5 Deanfield Drive, Clitheroe (Beaconfell Bikes)	£0.00	0.0%	£0.00	0.0%	£1.01
Holmes Mill, Greenacre Street, Clitheroe	-£0.01	-0.4%	-£0.01	-0.4%	£2.81
Land at Barrow Brook Enterprise Park, North Road, Barrow					£4.40
Totals	-£4.40				

Notes:
2017 Prices

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TABLE 9

Modified Market Shares in Comparison Expenditure by Zone (%)				
	Zone 1 ***Forest of Bowland***	***Zone 2*** ***Clitheroe Area***	***Zone 3*** ***Whalley Area***	***Total Study Area***
Clitheroe Town centre	45.2%	37.6%	17.5%	28.8%
Longridge Town centre	0.1%	0.0%	0.3%	0.2%
Whalley town centre	0.8%	0.4%	0.9%	0.7%
Colne Town Centre	2.7%	0.4%	0.8%	1.1%
Nelson Town Centre	0.9%	0.0%	0.0%	0.2%
Burnley Town Centre	2.8%	4.0%	5.5%	4.5%
Accrington Town Centre	2.4%	1.3%	8.0%	5.0%
Blackburn Town centre	9.0%	17.1%	28.9%	21.5%
Preston City Centre	3.9%	4.6%	4.8%	4.5%
Deepdale Retail park	0.4%	1.0%	0.3%	0.5%
Skipton Town Centre	3.1%	1.0%	1.0%	1.4%
Manchester City Centre	3.4%	4.8%	2.9%	3.5%
Trafford Centre	0.4%	1.1%	0.6%	0.7%
Other	18.3%	21.0%	26.2%	23.2%
Commitments				
Former Barkers Garden Centre Whalley Road, Clitheroe (Aldi)	2.0%	1.7%	0.7%	1.3%
Unit 3-5 Deanfield Drive, Clitheroe (Beaconfell Bikes)	0.6%	0.5%	0.2%	0.4%
Holmes Mill, Greenacre Street, Clitheroe	1.9%	1.5%	0.7%	1.2%
Land at Barrow Brook Enterprise Park, North Road, Barrow	2.3%	2.0%	0.7%	1.4%
Totals	100.0%	100.0%	100.0%	100.0%

Notes:

The modified market shares are based on market shares illustrated in Table 5, modified to take account of changes arising from commitments sets out in Table 8.

Proposed Development at Shackletons Garden Centre
Clitheroe Road, Chatburn

TABLE 10

Turnover of the Proposed Development				
	Total gross area (sqm) *Sqm*	*Total sales area* *Sqm*	*Comparison sales density* *£ per sqm*	*Total turnover* *£m*
Proposed Extension to Shackletons	1,532	1,532	5,000	£7.66

Notes:
The sales density is a judgement having regard to guidance from Shackletons and data on furniture retailers and garden centre operators from Mintel Retail Rankings.
2017 Prices

TABLE 11

Trade Draw of the Proposed Development					
	Zone 1 *Forest of Bowland*	*Zone 2* *Clitheroe Area*	*Zone 3* *Whalley Area*	*Elsewhere*	*Total*
Trade Draw %	15.0%	22.5%	12.5%	50.0%	100.0%
Trade Draw (£m)	£1.15	£1.72	£0.96	£3.83	£7.66

Notes:
Trade draw has regard to the existing pattern of shopping at Shackltons. However, the actual trade draw iss likely too be morre diffuse with lower percentages from each zone comprising the sudy area and a greater proportion from outside.

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Proposed Development at Shackletons Garden Centre
Clitheroe Road, Chatburn

TABLE 12

All Trade Diversions

	Comparison turnover (£m) (no development)		*Impact of Commitments*			*Proposed Extension to Shackletons*				
	2020	*2025*	*Cumulative diversion*	*Cumulative impact*	*Turnover following*	*Solus diversion*	*Solus impact*	*Cumulative diversion*	*Cumulative impact*	*Turnover following*
Clitheroe Town centre	£64.91	£71.58	-£1.40	-2.0%	£70.18	-£1.27	-1.8%	-£2.67	-3.7%	£68.91
Longridge Town centre	£10.40	£11.47	-£0.04	-0.3%	£11.43	£0.00	0.0%	-£0.04	-0.3%	£11.43
Whalley town centre	£4.60	£5.07	-£0.01	-0.2%	£5.06	£0.00	0.0%	-£0.01	-0.2%	£5.06
Colne Town Centre	£66.00	£72.78	-£0.02	0.0%	£72.76	-£0.02	0.0%	-£0.04	0.0%	£72.75
Nelson Town Centre	£85.00	£93.73	£0.00	0.0%	£93.73	£0.00	0.0%	-£0.01	0.0%	£93.72
Burnley Town Centre	£180.00	£198.49	-£0.07	0.0%	£198.43	-£0.28	-0.1%	-£0.34	-0.2%	£198.15
Accrington Town Centre	£57.00	£62.86	-£0.47	-0.7%	£62.39	-£0.26	-0.4%	-£0.72	-1.1%	£62.13
Blackburn Town centre	£206.00	£227.16	-£1.54	-0.7%	£225.62	-£1.01	-0.4%	-£2.56	-1.1%	£224.61
Preston City Centre	£370.00	£408.01	-£0.64	-0.2%	£407.37	-£0.52	-0.1%	-£1.16	-0.3%	£406.85
Deepdale Retail park	£175.00	£192.98	-£0.02	0.0%	£192.95	-£0.18	-0.1%	-£0.21	-0.1%	£192.77
Skipton Town Centre			-£0.08			-£0.20		-£0.28		
Manchester City Centre			-£0.19			-£0.23		-£0.41		
Trafford Centre			-£0.05			-£0.18		-£0.24		
Other			-£2.61			-£2.53		-£5.14		
Commitments										
			£0.00	0.0%	£2.74	£0.00	0.0%	£0.00	0.0%	£2.74
Former Barkers Garden Centre Whalley Road, Clitheroe (Aldi)										
Unit 3-5 Deanfield Drive, Clitheroe (Beaconfell Bikes)			£0.00	0.0%	£1.01	£0.00	0.0%	£0.00	0.0%	£1.01
Holmes Mill, Greenacre Street, Clitheroe			-£0.01	-0.4%	£2.80	£0.00	0.0%	-£0.01	281.9%	£2.80
Land at Barrow Brook Enterprise Park, North Road, Barrow			£0.00	0.0%	£4.40	-£0.99	-22.4%	-£0.99	-22.4%	£3.41
Proposed Extension to Shackletons										£7.66
Totals			-£7.15			-£7.66		-£14.81		

Notes:

2017 Prices

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