

# Planning & Retail Statement

Salisbury Road, Totton



London



Harrogate



Bristol

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## 1. Introduction

- 1.1. This Planning and Retail Statement is submitted by Planning Potential, on behalf of Aldi Stores Limited (Aldi), in support of a full planning application for a new Aldi foodstore (Use Class E) and general industrial/distribution uses (Class B2/B8) on land at Little Testwood Farm, Salisbury Road, Totton SO40 2RW.
- 1.2. The description of development proposed is:

*“Full planning permission for the erection of a Class E foodstore (1,890sqm gross), with associated access, car parking and landscaping, and the erection of a Class B2/B8 employment unit (1,848sqm gross), with parking and landscaping.”*
- 1.3. This Statement addresses all the relevant planning policy considerations associated with the proposed development, but should be read in conjunction with other documents and drawings submitted in support of this application.

## Background

- 1.4. The planning application site lies in the Calmore area of northern Totton, approximately 2.5km to the north of the town centre. The site comprises a vacant plot of land (c. 1.59ha) and lies on the eastern side of the A36 Salisbury Road, to the north of AFC Totton Football Club. To the north of the site lies Little Testwood Farmhouse and a travellers' site.
- 1.5. Both the application site and AFC Totton Football Club share a dedicated access point from Salisbury Road, and this arrangement is proposed to be retained with the new proposals.
- 1.6. The application site has a detailed planning history (considered further in Section 2), and benefits from an extant planning permission for the development of industrial units (Class B1c, B2 and B8), with ancillary trade counter uses, parking, service yards and landscaping (ref. 20/10109). That permission is material to the consideration and assessment of this new planning application.
- 1.7. The application site proposes the development of Class E retail uses on a site that is not within a designated town centre. Retail policy matters (as set out at both the national and local level) are therefore relevant to the determination of the proposals.
- 1.8. It is also important to note that the application site is designated for employment development in accordance with Core Strategy Policy CS18 and Local Plan Part 2 Policy TOT12. Although the site does benefit from permission for employment uses, that development has not come forward, and this new application provides the opportunity for the proposed Aldi store (Class E) to act as an enabling development for the Class B2/B8 employment unit. The current proposal will, therefore, provide employment generating uses, as envisaged within local policy.

## Retail Context

- 1.9. National policy applying to proposals involving retail development is set out at Paragraphs 86-91 of the National Planning Policy Framework (NPPF) 2021.
- 1.10. Paragraph 87 of the NPPF confirms that local planning authorities should apply a 'sequential test' to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.
- 1.11. Paragraph 90 of the NPPF confirms that when assessing retail proposals outside town centres, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally-set threshold, the NPPF confirms that the default threshold is 2,500sqm (gross).
- 1.12. In this specific case, adopted Local Plan Part 1 Policy ECON5 does not identify a specific proportionate, locally set threshold, above which retail impact assessments are required although it is noted that paragraph 7.40 states that an impact assessment will be necessary for proposals above 1,000sqm outside town centre boundaries. Policy ECON5 (ii) does contain a requirement to demonstrate that when considering a proposed development, it should be demonstrated that *“there would be no significant adverse impact on the vitality and viability of town centre and large villages.”* A proportionate impact assessment has therefore been undertaken and is included as Chapter 6 of this report.

## Report Structure

- 1.13. This Planning and Retail Statement is set out as follows:
  - Section 2 – Summarises the site context, relevant planning history, the development proposals and the Aldi business;

- Section 3 – Sets out the planning and retail policy context against which the proposal should be assessed, including relevant provisions of both the development plan and the NPPF;
- Section 4 – Outlines the retail context;
- Section 5 – Sets out our sequential site assessment;
- Section 6 – Sets out our retail impact assessment;
- Section 7 – Considers other relevant planning issues associated with the proposed development; and
- Section 8 – Presents our summary and conclusions.

1.14. It should be noted that Section 2 of this Statement sets out in some detail the nature of Aldi, in terms of the proposed uses and the format of the proposed store. This should be an important consideration in the District Council's assessment of this planning application, and demonstrates the qualitative improvement to retail provision that will be brought about through this application proposal.



## 2. Site Context and Development Proposals

### The Site

- 2.1. The application site comprises a vacant plot of land (c. 1.59ha) that lies to the north of AFC Totton Football Club, which itself lies 2.5km to the north of Totton town centre. Access to both the site and the football club is taken from the eastern side of Salisbury Road, with a spur road to the football club itself to the south.
- 2.2. The site has largely been cleared from vegetation as part of earlier development proposal, and includes a watercourse along its southern boundary. As with previous proposals, this application will alter the alignment of the watercourse and provide an area for landscaping to the south of the site.

### Relevant Planning History

- 2.3. The site (and surrounding area) has an extensive planning history, much of which is relevant to the consideration of this application. In summary only:
  - The adjacent football club has received planning permission for residential development (ref. 07/90288). Under the terms of that permission (and associated S106 agreement), the planning application site has been the subject of planning applications to secure employment development.
  - Planning permission was first received for employment development of the application site in November 2019 (ref. 18/11691). The permission allowed the development of four industrial units (Class B1c, B2 and B8) with ancillary trade counter uses.
  - A revised application for industrial and trade counter uses was subsequently submitted and approved in October 2020 (ref. 20/10109). This permission remains extant and capable of development.
- 2.4. These permissions establish the development of the site in principle. Nevertheless, commercial interest in the full occupation of the site for employment uses has not materialised, and the development has not come forward as envisaged.

### Pre-Application Dialogue

- 2.5. A pre-application dialogue with New Forest District Council was commenced in October 2020, and a virtual meeting was held with Officers in November 2020. Written pre-application advice was subsequently provided by letter dated 8 February 2021. That advice identified the need for the application proposals to consider both retail and employment policy matters, together with issues relating to highways, landscaping and ecology. All these matters are addressed in this application submission.

### EIA Screening

- 2.6. Although the site's development is not considered to generate significant environmental effects, it is above the threshold at which a 'screening opinion' is necessary. As part of the application, the Council has therefore been invited to confirm that an Environmental Statement is not required.

### The Proposed Development

- 2.7. The proposed development comprises the erection of two separate new buildings as follows:
  - An Aldi foodstore (Use Class E) providing 1,890sqm gross (1,315sqm net) floorspace;
  - An employment unit (Use Classes B2 and B8), providing 1,848 sqm gross, with a ground floor workshop area, and first floor offices and welfare.
- 2.8. Both elements of the site are accessed via Salisbury Road, which is consistent with the previously approved applications for employment use. Landscaping is also provided across the site, with pedestrian access/crossing facilities incorporated into the proposed highways design.

### Aldi Store

- 2.9. The Aldi store will provide a net trading area of 1,315sqm, with additional warehouse and welfare areas. An integrated loading bay is provided on the north-east elevation.
- 2.10. The store itself comprises a single-storey contemporary designed building, with a mono-pitch roof design. A total of 144 car parking spaces will be provided to the front of the site and south east of the store building, which includes six spaces designated for disabled

users, and eight spaces for parents shopping with their children. Four operational electric vehicle charging spaces are provided, with provision made for a further 20 spaces in the future. Eight cycle parking spaces are provided (via four Sheffield stands) close to the store entrance.

### Employment Unit

- 2.11. The employment unit has been designed to provide flexible accommodation for a variety of potential occupiers within Use Classes B2 and B8. The building itself is a two-story, pitched roof design, with operational space provided on the ground floor and welfare/mezzanine areas provided at first floor. The north-east elevation provides two overhead shutter doors from the building into a secure service yard.
- 2.12. A total of 47 car parking spaces are proposed, through both the front car park and rear service yard. Two designated spaces are provided for disabled users, and four active electric charging points are provided (with provision for a further 10).

### Aldi Stores Limited

#### Who is Aldi?

- 2.13. Aldi is one of the world's leading grocery retailers. The company has built a network of stores in Europe, the USA and Australia. Aldi first entered the UK market in 1990 and has now expanded to over 960 stores across England, Scotland and Wales.
- 2.14. Aldi stores offer the customer a carefully selected range of high quality, exclusive own label groceries at heavily discounted prices. These prices are guaranteed across the entire range of products. The aim is for goods to be sold with discounts of between 20–30% for a full shopping trolley.
- 2.15. Aldi regularly receives industry awards recognising the quality of its products and customer experience. Aldi has been named as the UK's Cheapest Supermarket for 2021 by consumer champion, Which? and were the only supermarket to receive Which? In Store Recommended Provider for February 2022. Aldi was also voted Britain's Favourite Supermarket and Wine Retailer of the Year for the third consecutive time by readers of Good Housekeeping magazine, while its 'Specially Selected' range was voted Favourite Premium Supermarket Range for the second year running.

#### How Aldi is Different

- 2.16. Aldi has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, from supplier to customer. This enables Aldi to sell high quality products, from a limited core range (compared with other supermarkets) of mainly exclusive own labels, at the lowest possible price consistently across the entire range. Aldi is a 'deep discount' retailer.
- 2.17. The main points of the trading philosophy include:
- Maximum operational efficiency and cost control;
  - Standard merchandising through the stores;
  - Bulk displays in original shipping cases;
  - Efficient operation from supplier to customer;
  - Unique delivery system;
  - Efficient checkout system;
  - Carefully selected and limited core range of 1,500 products;
  - Own label high quality products;
  - Formidable buying power;
  - High volume and turnover per product;
  - Heavily discounted prices providing an average 20-30% saving across the entire range, compared with similar quality products.

- 2.18. The consequence of providing this value-retailing concept and service, of high quality food at heavily discounted prices, is that the design of the store and the sales area are uniform, in order to accommodate bulk food displays and provide the operational efficiency that a discount foodstore requires. These efficiencies are found across the entire operation from supplier to retail store and result in an enviable cost structure that allows Aldi to sell quality food at low prices, and operate on much smaller margins than other foodstores.
- 2.19. As stated, Aldi stores offer a carefully selected and limited core range of good quality exclusive own labels at heavily discounted prices. Predominantly, the limited range of goods relates to a reduced range of variations on the same product line compared with most other supermarkets. These are the most popular items: the ones most used and needed in every household.
- 2.20. By limiting the core range, Aldi suppliers typically only need to produce one package size instead of multiple packages within the same category. With the higher volume of one item, Aldi achieve greater purchasing power. The limited core range further allows Aldi to apply its own label to most of its products (c.90%), which do not include costs that the national brands pass on through higher prices. This allows Aldi to gain a significant cost advantage over competitors without compromising quality.
- 2.21. The deliberate intention is to restrict the range of core goods to approximately 1,500 products in the interests of the consumer and operational efficiencies and pass these savings onto the customer. The restricted core range ensures a high volume and turnover of each individual item, resulting in a favourable cash flow with products effectively sold through the checkouts before they have been purchased centrally.
- 2.22. This is unlike the larger supermarkets that stock in the region of 20,000 - 40,000 product lines, and more modest sized operators, with floor areas of 1,000 – 1,500sqm selling 2,500 – 4,000 products. Aldi do not sell cigarettes and tobacco products, stationary products and pharmaceutical products. The Aldi trading philosophy does not include a specialist butcher, fishmonger, in-store bakery, delicatessen or hot food counter, which are commonplace in larger supermarkets. Aldi stores also do not accommodate in store cafes / restaurants or franchises such as photo processing, dry cleaning or opticians.
- 2.23. Whilst the core range of products is limited, Aldi offers a significant choice of locally sourced produce. Where possible Aldi's fresh meat and produce is UK sourced. Fresh fruit and vegetables are also sourced in the UK when in season and Aldi leads the way in supporting British farmers. In addition, Aldi works with a range of local businesses and suppliers in order to supply fresh bread, milk and other dairy products.
- 2.24. Aldi's stores dedicate approximately 20% of their floorspace to comparison goods. These goods are sold as 'special purchases' on a 'when it's gone, it's gone' basis. This approach is highly seasonal and there is a continued variation in the type of goods that may be on offer. This is a key difference for Aldi when compared with larger supermarkets that typically have 30-40% of their floor area for comparison goods, the majority of which is occupied by permanent product ranges.
- 2.25. How Aldi differs is demonstrated clearly by the trading philosophy. Aldi complement, rather than compete with, existing local traders, independent retailers and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade, which brings other qualitative benefits.

### Sustainable Development

- 2.26. Aldi supports sustainable development and has a strong track record in delivering schemes that contribute to the needs of the local economy.

### Catchment

- 2.27. As Aldi stores are of modest scale and fulfil a neighbourhood shopping role, it means more than one store can be accommodated in a Local Authority area. The catchment for a new store is localised and often shoppers to a new Aldi store are existing Aldi customers who have been travelling to their nearest store elsewhere, but with a new store opening close by, this can reduce the need to travel.
- 2.28. Aldi's local presence can assist in clawing back expenditure being spent elsewhere by providing a food store where perhaps such a facility was not previously available. This is most important in locations where shops and services are limited and access to stores elsewhere is difficult. A new store helps to retain expenditure within a given catchment area, to the benefit of the community.

## Store Operation and Design

- 2.29. The uniform internal layout of an Aldi store reflects the company philosophy of offering value for money through cost effective management and efficiency. The shop fittings are specifically designed and constructed to display the goods as received in their packing cases so there is no double handling of goods from packing cases to the shelves. It means new stock can be moved from the warehouse area to the shop floor quickly and in large quantities.
- 2.30. The operation of the store is designed to be efficient and practical for use by customers; ensuring the store offers inclusive accessibility to all. The efficient layout with typically only four or five aisles means customers can move through the store quickly. There is ease of access to goods with all shelving being within easy reach. As the range of goods is limited customers can find what they are looking for quickly. With goods being pre-packaged, such as fruit and vegetables, customer can identify goods quickly and shop efficiently. Importantly, there are long conveyors at the check-out that hold a customer's full shop to allow goods to be unloaded for scanning and payment quickly. Goods are re-loaded back into the trolley at the check-out and packing is undertaken at the customer's leisure beyond the check-out area.
- 2.31. Aldi recognises that design is a key consideration in the determination of applications for its stores. The external design has evolved over time and now the design for each new store is consistent across Aldi's portfolio, promoting modern, smart buildings with clean lines and glazed frontages that meet customer expectations.

## Accessibility

- 2.32. The local nature of many of Aldi's stores encourages high levels of pedestrian shoppers and users of public transport. At new stores, cycle stands are provided, close to the store entrance for natural surveillance and mostly under the store canopy, to encourage cycling as a mode of transport.
- 2.33. Aldi requires new stores to have car parking adjacent to cater for customers who choose this mode of transport. Most car trips to new Aldi stores are not new to the network but rather transferred or linked trips. Full details are provided in the accompanying Transport Statement.

## Residential Amenity

- 2.34. The opening hours of Aldi stores are more limited than some other larger supermarkets, which operate 24-hours a day. Currently Aldi stores operate 0800 to 2200 Monday to Saturday and for six hours between 1000 to 1800 on Sundays, to comply with Sunday Trading Laws.
- 2.35. As Aldi stores are often located in residential areas, Aldi is committed to being a responsible neighbour and seeks to ensure the amenity of residents is maintained.

## Job Creation and Training

- 2.36. New Aldi stores generally employ between 30 - 50 staff. It is Aldi's preference to recruit staff locally. The company's remuneration and training policy reflects Aldi's firm belief that a well-trained and highly motivated workforce is essential to the success of the business. All hourly paid wages for store employees exceed the Government's National Living Wage and the Living Wage Foundation's recommended national rate. Aldi offers full training for all its positions and the schedule and facets of the training are tailored to the individual.
- 2.37. Aldi has two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as opportunities for progression through to the Store Management Team.
- 2.38. Aldi's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.
- 2.39. The construction of a new store requires the services of local building trade contractors, which provides employment opportunities during the build out period. Usually a range of skills such as ground works, steel, brick and block work and shop fitting are sourced locally, as well as cleaners and labourers.

- 2.40. During both the construction and store operation phases, an Aldi store development therefore provides significant employment benefits to the local area, with the associated economic benefits being felt in the catchment. Aldi stores provide a positive economic boost to the towns in which they are situated.

### 3. Planning Policy Context

- 3.1. This section of the Planning & Retail Statement considers the planning policy context, in particular the local and national planning policies, and also supplementary guidance, relevant to the consideration of the application proposals.

#### National Planning Policy Framework (July 2021)

- 3.2. The revised National Planning Policy Framework (NPPF) was published in July 2021 and forms the planning framework for England. The previous NPPF and National policy tier of PPS/PPG/MPG has been superseded by the revised NPPF.

#### Achieving Sustainable Development

- 3.3. Paragraph 8 of the NPPF states that there are three dimensions to achieving sustainable development:
- a) *“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;”*
  - b) *“a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and”*
  - c) *“an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

#### Presumption in Favour

- 3.4. A ‘Presumption in Favour of Sustainable Development’ is central to the NPPF. Paragraph 11 of the NPPF states that:

*“Plans and decisions should apply a presumption in favour of sustainable development.”*

- 3.5. Paragraph 11 of the NPPF requires that for decision-taking this means:

- a) *“approving development proposals that accord with an up-to-date development plan without delay; or”*
- b) *“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:”*
  - i. *“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or”*
  - ii. *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

#### Core Policies

- 3.6. Paragraph 38 of the NPPF states that

*“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

- 3.7. Paragraph 81 of the NPPF states that

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both”*



*local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."*

- 3.8. Paragraph 82 continues this thread, and states that *"Planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances."*
- 3.9. Paragraph 122 states that *"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:*
- a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and*
  - b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area."*

### Retail Guidance

- 3.10. National policy applying to proposals involving retail development is set out at Paragraphs 86-91 of the NPPF.
- 3.11. Paragraph 87 of the NPPF confirms that Local 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 plan.
- 3.12. Such proposals are required to be located in town centres, then edge-of-centre locations, and only if suitable sites are not available should out-of-centre sites be considered. At paragraph 88 the NPPF advises that in considering edge and out-of-centre sites, preference should be given to accessible sites, which are well connected to the town centre.
- 3.13. Town centres are defined in the NPPF as city, town, district and local centres, but exclude small parades of shops of purely neighbourhood significance. The relevant area is to be defined on the Local Authority proposals map, including the Primary Shopping Area (PSA) and areas predominantly occupied by main town centre uses within or adjacent to the PSA.
- 3.14. Paragraph 90 of the NPPF confirms that when assessing retail proposals outside town centres, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no threshold, the NPPF confirms that the default threshold is 2,500 sq m (gross).
- 3.15. In this specific case, adopted New Forest District Local Plan Part 1 Policy ECON5 does not identify a specific proportionate, locally set, threshold above which retail impact assessments are required. Paragraph 7.40 does, however, note that outside town centre boundaries, retail development proposals of over 1,000sqm will be subject to an impact assessment. It is also acknowledged that Policy ECON5(ii) contains a requirement to demonstrate that when considering a proposed development it should be demonstrated that *"there would be no significant adverse impact on the vitality and viability of town centres and larger villages"*.
- 3.16. It was also advised as part of the applicant's pre-application process that a retail impact assessment would be required to. Although 'retail need' no longer represents a material issue in retail planning terms, it is recognised that impact will be a consideration in this case and a proportionate impact assessment has therefore been undertaken.

### Requiring Good Design

- 3.17. Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

## Development Plan

### New Forest District Local Plan Part 1 (July 2020)

- 3.18. Relevant policy criteria within the Local Plan Part 1 includes Policy STR1: Achieving Sustainable Development, which states that *“All new development will be expected to make a positive social, economic and environmental contribution to community and business life”*. This includes:
- Taking a context and landscape-led approach to the siting and design of development to (inter alia) deliver high-quality design, high-quality new landscapes, and sustain and enhance the amenity value of the Plan Area;
  - Achieving environmental net gain;
  - Ensuring development contributes to a diverse and thriving local economy, providing a overall balance of uses, services and opportunities.
- 3.19. Policy STR3 sets out the strategy for locating new development, and confirms the policy approach to locate and direct new development to accessible locations that help to sustain the vitality and viability of the towns and villages as the focal points of commercial activity and community life.
- 3.20. Policy STR4 sets out the settlement hierarchy for the plan area, and identifies three tiers of settlements. Totton is identified as a ‘Town’ and is considered one of the most sustainable locations for retail development to improve the town’s self-containment and to support and consolidate their local service offer.
- 3.21. Paragraphs 7.35 – 7.37 continue this theme and note that the Local Plan takes a flexible approach, setting a framework to respond to future interest or demand. Paragraph 7.37 notes that the aim of the policies are to ensure town centres remain a focal point for new investment to retain and enhance their roles.
- 3.22. Policy ECON2 states that *“Employment sites that remain suitable for employment use will be retained for continued employment use wherever possible.”* Part (ii) of the Policy states that for other non-employment use to be supported it should be demonstrated that *“the employment site is no longer suitable or viable for continued employment use.”* Suitable evidence is to be provided, including that the site has been actively but unsuccessfully marketed for employment use on unrestricted terms at a realistic price for a minimum period of 12 consecutive months.
- 3.23. Policy ECON5 deals specifically with retail development and main town centre uses. It is Policy ECON5 that confirms the strategy to support investment in town centres by applying the ‘town centres first’ approach. Part ii of Policy ECON5 sets out the criteria under which proposals that are in more peripheral locations (and that are not in accordance with site allocation policies) will be assessed. These criteria include the sequential and retail impact ‘tests’.

### New Forest District (outside the National Park) Local Plan Part 2 (April 2014)

- 3.24. The April 2014 Local Plan Part 2 provides more detailed and site-specific policy advice to guide development in the District. In considering the provision of additional retail floorspace, it is noted that some of the requirements are to be met through the re-occupation of vacant shop units and the improvement of existing premises. Paragraph 2.96 advises that retail proposals above 1,000sqm and outside town centre boundaries, will be subject to an impact test (which is also reflected in the supporting text to LP Part 1 Policy ECON5).
- 3.25. In terms of site-specific advice, the application site is identified for employment development under Policy TOT12. The Policy specifically requires provision of vehicular, pedestrian and cycle access from Salisbury Road, retention of important trees, additional landscaping on the boundaries, retention and enhancement of the watercourse, and an assessment of potential contamination.
- 3.26. Policy TOT15 identifies ‘town centre opportunity sites’ for development of a variety of uses, including retail. These sites have been considered further as part of our assessment of the sequential approach to site selection.



## 4. Retail Context

- 4.1. This Section provides further context in respect of the retail background to the proposals.
- 4.2. The principal policies for assessing town centre and retail uses are set out in Paragraphs 86 - 91 of the NPPF. It is stated that retail centres are the preferred location for new development. The NPPF (Annex 2) also confirms that references to 'town centres' relate to all designated centres (e.g. town centres, district centres and local centres).
- 4.3. Where proposals for 'town centre uses' (including retail) are not located within existing centres, the NPPF requires proposals to demonstrate compliance with the sequential approach and, if over 2,500 sq m, consider potential impacts of the development (unless there is a lower locally set threshold). Only where a proposal fails to comply with the sequential test or would have **significant adverse** impact should permission be refused.
- 4.4. This is an important consideration. Retail facilities are an important component of everyday life and, whilst existing centres may be a preference, this may not always be possible owing to a number of factors. Where the sequential approach is satisfied and potential impacts would not be 'significantly adverse', the NPPF accepts the principle of new retail floorspace in non-town centre locations, including where they are in edge-of-centre, out-of-centre, and out-of-town locations.
- 4.5. The fact a retail application does not fall within or relate to a town centre location is not therefore a default reason to refuse planning permission.
- 4.6. In this context, all aspects of a planning application must be considered in assessing potential merits and indeed this is a fundamental point of planning law (S.70, Town & Country Planning Act, 1990), which requires planning applications to be considered against the development plan and all other material considerations.
- 4.7. This Planning and Retail Statement considers whether there are any sequentially preferable sites, and the impact of the proposed development (in terms of both future investment and town centre vitality and viability).

## Town Centre Health Check

- 4.8. To assist in the consideration of the potential implications of the store's development, we set out below a baseline assessment of the current health of Totton town centre. Totton is the nearest town centre to the application site, and the one most likely to experience direct impacts as a result of the proposals.
- 4.9. Planning Potential has undertaken a review and assessment of the centre to provide an up to date Health Check, including an initial site visit in August 2021. At that time some restrictions remained in place as a result of the Covid-19 pandemic, and retail trading remained subdued. As a result, a further visit was undertaken in early April 2022, once all the restrictions had been removed.
- 4.10. In undertaking this assessment, we have considered the relevant town centre 'health' indicators set out at paragraph 2b-006-20190722 of the Planning Practice Guidance. Suitably up-to-date information is not available for all of these indicators (e.g. commercial rents and yields), but we have considered those most relevant to the application further below.

## Totton Town Centre

- 4.11. Totton is the main town centre serving the north-east of New Forest District. The town is located very close to the western suburbs of Southampton and is well-linked with the city via both road and rail connections. As a main town centre within New Forest, the delivery of retail uses into Totton town centre should be supported as a positive attribute to the overall sustainability of the locality.
- 4.12. The town's location close to the Southampton urban area does, however, result in retail trade being drawn away to the higher order centres to the east. Although Totton does benefit from convenience shopping facilities, there are also several new competitors on the western side of Southampton (e.g. Lidl, Brownhill Way) that can attract trade from the Totton area.
- 4.13. Totton town centre is, however, a modern retail destination, which centres on the roundabout junction between the A36/Commercial Road and A336/Ringwood Road. A further secondary area of retail activity is located around Rumsbridge Street to the south. Principal areas of activity are located around the Asda store (which can be accessed on foot from Commercial Road) and Totton Precinct. The centre contains a wide mix of traditional shop units and more modern purpose-built developments. Rumsbridge Street is a more traditional linear retail destination.

### *Diversity of Uses/Balance Between Independent and Multiple Stores*

- 4.14. Totton comprises a wide mix of retail uses, including purpose-built food retail stores (Lidl, Totton Retail Park; Asda, Maynard Road; and Totton Precinct). These comprise both main and top-up food destinations (including a small Co-op at Rumsbridge Street), café and restaurant uses, and non-food retailers. There are a number of national multiple retailers present, including Poundland, Lloyds Pharmacy and Argos, together with high street banks and building societies.
- 4.15. At the time of both our visits the centre was lively, and the April 2022 visit in particular indicated that visitors have returned to the centre following the removal of all trading restrictions.

### *Proportion of Vacant Street Level Property*

- 4.16. At the time of our most recent visit (April 2022) there were some vacant units evident, particularly to the east of the Commercial Road area. These were mainly more traditional units (with upper floor uses) and there were no specific concentrations of vacancies that would indicate an underlying concern. It is widely acknowledged that the vacancy rate as an indicator itself should be used with caution, as vacancies will arise in even the most vibrant retail centre.

### *Pedestrian Flows*

- 4.17. There was a good level of pedestrian activity in and around the centre, particularly in close proximity to both Totton Precinct and the Asda store. There was clear evidence of pedestrians linking between both the centre and the car parks at Library Road, War Memorial and Asda. Flows between the north and south of Commercial Road are slightly restricted by the nature of the road as it passes through the central area (a three-lane highway leading to a roundabout), although there are good pedestrian crossing facilities provided.
- 4.18. The quality of the pedestrian environment is general very high, although the environment does diminish in the more secondary areas of the centre. Pedestrian flows in the Rumsbridge Street area were somewhat lighter, which reflects the area's more secondary retail nature.

### *Accessibility*

- 4.19. Totton is well connected to the surrounding area with bus routes from the north, south, east and west to the centre. The town also benefits from a main line railway station (to the south), linking the town with Southampton to the east, and Christchurch, Bournemouth and Poole in the west. It can also be accessed by bicycle and foot from the surrounding residential areas.
- 4.20. In many respects, the town's accessibility to the higher order centres in Southampton might be considered a weakness, with shoppers being attracted to the facilities provided elsewhere, rather than retaining their expenditure within the town itself.

### *Perception of Safety and Occurrence of Crime*

- 4.21. Totton feels like a very safe centre, with good levels of lighting, pleasant seating areas and a high level of activity to maximise the levels of natural surveillance. This is particularly evident in the centre of the town, in and around the Precinct. Secondary areas away from the centre (e.g. to the east of Commercial Road) do not benefit from the same level of patronage, and are a little run down.
- 4.22. Notwithstanding this, there is very little evidence of petty crime, with low levels of graffiti or vandalism and few areas that would result in an intimidating environment after dark.

### *Town Centre Environmental Quality*

- 4.23. Totton's town centre environmental quality is of a good standard. There are areas that have been carefully landscaped with soft and hard landscaping. Totton appears relatively safe, and is also relatively easy to navigate given the road network that bisects the town. Some of the more secondary retail areas would benefit from additional soft landscaping, and improvements to paving, but these do not significantly detract from the centre's overall quality.

### *Barriers to New Investment*

- 4.24. Totton is a tightly constrained centre within a high density area of development. There are relatively few obvious opportunities for new investment, although we do not that Local Plan Part 2 Policy TOT15 identifies a number of sites where additional development will be supported. These sites are relatively small and would not accommodate the form of development proposed in this application. They may, however, support the development of smaller footprint retail uses.

- 4.25. The small car park site to the west of Totton Precinct represents an area that could accommodate expanded retail uses (subject to parking and servicing arrangements). We are also aware that proposals to expand and improve the existing Lidl store at Totton Retail Park have been granted permission and are due to commence shortly.
- 4.26. There are no obvious barriers to further investment, including potential expansion of existing retailers.

#### *Opening Hours/Evidence of Night-time Economy*

- 4.27. Although a relatively small centre for its type, Totton does have a number of uses that are open later into the evening. There are several restaurants and cafes that open later into the evening, and the Asda store itself remains open until 10pm on weekdays. The Elephant and Castle public house is also open into the evenings. There do not appear to be any additional/late-night entertainment venues, and apart from private social clubs (e.g. the Conservative Club) there is no cinema, nightclub or other commercial leisure operator present.
- 4.28. The Rumsbridge Street area of Totton has additional evening uses, including restaurants and take-away uses, and the Peg & Parrot public house.

#### *Conclusion*

- 4.29. Overall, it is considered that Totton town centre is performing well and fulfils its role as a main town centre. There are opportunities to improve and invest in the centre, which is recognised within adopted planning policy, but the centre does appear to function well with no obvious signs of under-performance or vulnerability. Our two visits, both during and after trading restrictions were removed as part of the Covid-19 pandemic indicate that the centre has recovered well.
- 4.30. It is clear that food retail does represent an important element of the centre's retail offer, with the Asda and Lidl foodstores attracting trips. Both stores are trading well, and we note that the Lidl store is shortly to be extended and improved (through acquisition of an adjacent existing retail unit).
- 4.31. Overall, we consider that Totton town centre remains a vital and viable centre, which is not vulnerable to retail impact associated with the discount foodstore. This issue is considered in more detail in Section 6.

## 5. The Sequential Approach

- 5.1. Paragraph 87 of the NPPF and Policy ECON state that proposals for retail development outside town centres should follow the sequential assessment process. This requires that applications for main town centre uses to be located in town centres, then edge of centre locations, and only if suitable sites are not available should out of centre sites be considered.
- 5.2. The application site lies within an out of centre location, approximately 2.5km north of Totton town centre. Although the site lies within the built-up area of Totton, it nevertheless should be subject to the sequential 'test'.
- 5.3. A sequential assessment has therefore been undertaken for this development proposal. This assessment is based on information regarding the potential availability and suitability of alternative sites, and policy guidance set out in the New Forest Local Plan Part 2 Policy TOT15.
- 5.4. Site visits were also undertaken by Planning Potential in August 2021 and April 2022 to inspect the respective sites and surrounding areas, as well as to assist in determining whether any other alternative sites should be analysed.
- 5.5. The sites that we have considered worthy of further analysis are all within either town centre or edge-of-centre locations, and are as follows:
  - Totton Conservative Club, Salisbury Road (TOT15.1)
  - Library Road Car Park (TOT15.2)
  - Former Petrol Filling Station (TOT15.3)
  - Totton Retail Park Service Area (TOT15.4)
  - Totton Timber Company (TOT15.7)
  - Land Between Asda and Junction Road (TOT15.8)
- 5.6. Our findings in relation to these sites are set out in detail below.

### Sequential Assessment - Parameters

- 5.7. Paragraph 87 of the NPPF and the Planning Practice Guidance (Paragraph 010 – Planning for Town Centre Vitality and Viability) confirms that, in reviewing alternative sites, regard should be given to suitability and availability of those sites (with reference to the nature of the need that is to be addressed). These are summarised as follows:
  - Availability – whether sites are available now or are likely to become available for development within a reasonable period of time (determined on the scale and complexity of the proposed scheme and the sites to be taken into account)
  - Suitability – with due regard to the requirement to demonstrate flexibility in the format and/or scale of the proposal, whether sites are suitable to accommodate the proposal or make a contribution to accommodate the proposal.
  - Viability – whether there is a reasonable prospect that development will occur on the site at a particular point in time. Again, the importance of demonstrating the viability of alternatives depends in part on the need that is to be addressed through the proposal.
- 5.8. **Section 3** above outlines the key characteristics of Aldi, including the specific matters relating to the design and layout of an Aldi store. This is an important consideration when analysing the potential sequential sites.
- 5.9. Whilst 'viability' is not expressly referenced by the NPPF (or PPG) in relation to the consideration of planning applications, it is cited as a relevant consideration in the allocation of sites. It is our view that viability remains relevant to the consideration of whether sites are 'suitable' (for completeness, we have therefore included viability within our consideration of sequentially preferable sites).
- 5.10. Paragraph 013 of the Planning Practice Guidance acknowledges that providing *"new development in town centre locations can be more expensive and complicated than building elsewhere"*. As a result, local planning authorities are required to be both realistic and flexible in terms of their expectations.
- 5.11. The above parameters provide a robust and policy-compliant basis for assessment.

- 5.12. In considering the sites, we have had regard to case law that has influenced the interpretation of the NPPF (and PPG). This case law has included the principles established by the Supreme Court in their judgment with regard to a challenge by Tesco Stores Limited in Dundee, which was further clarified by the Secretary of State decision at Rushden Lakes.
- 5.13. In the Dundee Supreme Court decision, it is confirmed that when applying 'flexibility' to the consideration of alternative sites:
- "it is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre"* (paragraph 37).
- 5.14. And that when applying the sequential test, it should be directed:
- "to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is something less than that sought by the developer"* (paragraph 38).
- 5.15. Finally, the decision confirms that application proposals are generated by *"a developer's assessment of the market and that the criteria of flexibility and realism are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest in doing so."* Applicants should, however, demonstrate flexibility in terms of the scale of development and the amount of car parking required.
- 5.16. Further guidance was provided with regard to the application of the sequential test through a High Court judgment relating to an out of centre food retail proposal in Mansfield (Aldergate Properties Limited and Mansfield District Council and Regal Sherwood Oaks Limited; CO/6256/2015; 8 July 2016). This judgment also builds on a Secretary of State decision relating to a mixed-use retail proposal in Exeter (Land North of Honiton Road and West of Fitzroy Road; APP/Y1110/W/15/3005333) dated 30 June 2016.
- 5.17. Both decisions re-emphasise the 'town centres first' principle. They provide further clarity with regard to the assessment of potential sequentially preferable sites in terms of their 'suitability', 'availability', and the need for the applicant to demonstrate flexibility. In particular, the Mansfield decision confirms that when reviewing potential alternative sites:
- 5.18. The terms 'suitable' and 'available' mean suitable and available for the *"broad type of development which is proposed in the application by approximate size, type and range of goods."* (Paragraph 35).
- 5.19. This is to include the requirement for flexibility and *"excludes, generally, the identity and personal or corporate attitudes of an individual retailer"* (Paragraph 35).
- 5.20. In terms of a site's 'availability', this relates to a site's availability for the type of retail use for which permission is sought and not to its availability to a particular retailer (Paragraph 42).
- 5.21. The Mansfield decision therefore confirms that the sites covered by the sequential test search should not vary from applicant to applicant depending on the identity or specific retail model proposed. It is clear, for example, that the requirements of an individual retailer, their commercial attitudes, site preferences and competitive preferences should not dictate those sites that are 'suitable' or 'available' (Paragraph 38). In other words, sequential sites in town centres cannot be dismissed simply because an operator does not wish to compete with its own existing or committed stores located in or close to that centre.
- 5.22. In the Exeter case, the Inspector concluded (and the Secretary of State agreed) that 'availability' did not require a site to be on the open market to any developer (IR 11.39) and that the requirement to develop other parts of the site did not mean the area identified for retail was not 'available' (IR 11.40).
- 5.23. In terms of availability, both case law and recent decisions confirms that an alternative sequentially preferable site should be available within a similar timeframe as the proposed development. In this case, the application proposals are capable of being completed in 2023 and trading at full potential by 2024. In our view, sites that are not currently assembled, allowing construction to commence in 2023 should not be considered 'available' alternatives.
- 5.24. Also of relevance is the case at Leamington Shopping Park, Tachbrook Park Drive, Warwick (Appeal Ref: APP/T3725/W/18/3204311). Here, the inspector stated that the appeal did have certain characteristics, which could lead them to question whether it is appropriate to consider the option of disaggregation in this case. The inspector continued that there is no requirement in current Government policy or guidance for disaggregation to be considered. Equally, however, there is no specific prohibition of disaggregation in either the Framework or the Planning Practice Guidance (PPG).



- 5.25. In this specific case, the development comprises two distinct elements: the proposed Aldi foodstore and the proposed Class B2/B8 employment unit. The employment unit does not represent a 'main town centre' use as defined by the NPPF, and given the site's allocation for employment development (Policy TOT12), this element of the application is considered to be policy-compliant.
- 5.26. We have, therefore, undertaken the sequential site exercise on the basis of the proposed Aldi store alone. The application proposes the development of a 1,890sqm gross (1,315sqm net) store, with 144 car parking spaces. In order to undertake a robust assessment, we have adopted a flexible approach and considered whether any town centre or edge-of-centre site might be capable of accommodating a store of 1,600sqm gross (1,115sqm net) floorspace with parking for 120 vehicles. This represents a c.15% reduction on the application proposals.
- 5.27. The sequential assessment set out below has been undertaken in the context set by both relevant policy and the clarification provided through the decisions referred to above.

#### Totton Conservative Club, Salisbury Road (TOT15.1)

- 5.28. The Conservative Club site is identified as a potential opportunity for retail development within the Local Plan Part 2. The site lies on the corner of Salisbury Road and Library Road and fronts onto the A36/A336 roundabout. It is within the designated town centre and within the Primary Shopping Frontage.
- 5.29. The site is an existing private Conservative Club and is immediately to the south of South Parade, which comprises a number of retail shop units in beneficial occupation. The site also comprises a hair salon and estate agents. Access is provided via South Parade, with a small service area on the north-east side of the existing building.
- 5.30. Policy TOT15.1 does not specify the full extent of the site area, but the absolute maximum available would be 0.4ha. This compares with approximately 1ha required for the proposed foodstore. The Conservative Club is plainly too small to accommodate the broad type of development proposed, even when an appropriate level of flexibility is shown. Even were the site to be available for development, it is plainly not suitable and should be dismissed as a genuine alternative.

#### Library Road Car Par (TOT15.2)

- 5.31. The Library Road car park lies opposite the Conservative Club. It provides c 50 car parking spaces and also provides servicing access to the existing retail units on the western side of Totton Precinct. At c. 0.19ha the site is far too small to accommodate the proposed development. Only were a more comprehensive redevelopment of the wider Precinct site to come forward could the site accommodate a level of floorspace approach that required for the broad type of development proposed. Given the precinct site remains almost fully occupied (April 2022), we do not consider that it would be available for redevelopment.
- 5.32. We therefore conclude that the site is not suitable and should be dismissed from further analysis.

#### Former Petrol Station, Ringwood Road (TOT15.3)

- 5.33. The site lies to the north of Ringwood Road, west of the main town centre. To the south of the site lies the Asda customer car park. As a former petrol filling station, the site currently comprises a hand car wash. The site extends to only 0.06ha and could not be considered to represent a genuine alternative to the application site. While the principle of the site's redevelopment for retail uses is recognised, we do not consider that the development of a discount foodstore would be appropriate or even possible. There is no ability to provide either a reasonable level of floorspace or appropriate car parking and servicing. It should be dismissed as a potential alternative.

### Sequential Assessment Conclusion

- 5.34. Our review of relevant local policy, site visits and research has identified the above sites as worthy of consideration as part of the sequential assessment. Planning Potential has undertaken a review of these sites. The above analysis sets out why they do not represent suitable, available, or viable sequential alternatives for a new discount foodstore proposal of the broad scale and type that form this planning application.
- 5.35. For the avoidance of doubt, we have also considered whether there are any other sites outside the town centre, but with better connections to it, and have not identified any suitable opportunities. It is considered unnecessary to analyse any further sites within Totton, as any such sites are no more sequentially preferable than the application site.

- 5.36. On the basis of the above consideration of alternative sites, we conclude that there are no alternative sites within town or edge of centre locations that should be considered sequentially preferable to the application site. The proposed development site is, therefore, considered to represent the only site suitable, viable and available for the broad type of development proposed. On this basis we conclude that the site should be considered to comply with the sequential approach to site selection.

## 6. Assessment of Impact

- 6.1. This section of the report sets out our assessment of the economic implications of the proposed Aldi development. The retail impact analysis is presented as a series of tables, which are included in Appendix 1.
- 6.2. The application site (Salisbury Road) is in an out-of-centre location in retail policy term. It is situated approximately 2.5km to the north-west of Totton town centre, immediately adjacent to the Totton Football Club site. It is therefore subject to the retail impact test set by the NPPF and Policy ECON5 ('Retail Development and other main town uses') of the New Forest District Council ('NFDC') Local Plan 2016-36 (adopted July 2020). The requirement to provide a retail impact assessment applies only to the proposed Aldi foodstore element of the application proposals.
- 6.3. The proposed retail floorspace (a total of 1,890sqm gross is below the relevant threshold for the retail impact test set by national policy (2,500 sq. m. gross), although higher than the 1,000 sq. m. GIA threshold set by Local Plan Policy ECON5 (reasoned justification, paragraph 7.40). The assessment below responds to this policy context.

### Data Sources

- 6.4. The most recent evidence relating to retailing and shopping patterns in Totton and surrounding areas is set out in the New Forest District Council Retail Study Update, 2010. This was prepared by Nathaniel Lichfield and Partners ('NLP') for NFDC and published in July 2010.
- 6.5. No additional retail analysis has been commissioned by the Council as part of more recent Local Plan review process. The 1,000 sq. m. floorspace threshold for RIA, for example, has been carried forward from the previously adopted Plan (2014). The retail evidence base has not been updated since.
- 6.6. The analysis presented in the 2010 NLP Study is based on a household survey undertaken by NEMS in 2005. This survey and the analysis based upon it are more than 10 years old (with the survey undertaken more than 15 years ago). This study is historic and out-of-date in our view; it is not therefore appropriate as a basis for assessing the impact of the application proposal.
- 6.7. We have therefore applied an alternative, 'benchmark' based methodology, which is considered to be both robust and proportionate. This approach assesses the impact of the Aldi proposal against the turnover of existing stores and town centres calculated on the basis of published, average sales densities and net floorspace.
- 6.8. This methodology has been applied by WSP in quantifying the impact of an Aldi store proposal at nearby Milbrook, Southampton (WSP 'Planning Statement' on behalf of Verity Trustees Limited, Milbrook, October 2020). In this case, the impact assessment prepared by WSP has been accepted by the Local Authority, and its conclusions effectively endorsed by the Council through the grant of planning permission (20/01427/FUL, 23 December 2021). Our assessment below follows the structure of WSP's analysis whilst also utilising floorspace and other data (taken from the supporting appendices) to ensure consistency of approach.
- 6.9. Our analysis focuses on the convenience goods impact of the proposed Aldi store. Aldi stores are a primarily convenience goods shopping destination with only a small element of floorspace given over to comparison goods (typically 20%). Additionally, the comparison goods on sale in an Aldi store are predominantly temporary in nature. The products are typically time-limited 'special buys'; once the goods are sold, they are not restocked. As a result, the non-food comparison goods are ancillary to the primary purpose of the proposed store and are considered *de minimis*.
- 6.10. Drawing on our analysis of convenience goods impacts, and comparison goods turnover estimates prepared WSP, we have, however, estimated the overall impact of the proposal on the total turnover of Totton and other defined centres (convenience and comparison goods combined) in the design year. This includes comparison goods sales generated by the new Aldi store. The basis of this additional analysis is described below and included in Appendix 1 (Table 6).

### Assessment

- 6.11. The proposed development is a discount foodstore with a gross external floorspace of 1,890sqm gross, a net sales area of 1,315 sq. m, and a convenience goods sales area of circa 1,052 sq. m (80%). The application is submitted on the basis that Aldi will be the end-user, and this is reflected in our assumptions below.
- 6.12. The assessment directly addresses the policy context as set out in Section 3 above, including the retail impact 'test' identified in the NPPF, paragraphs 90 and 91.



## Methodology

- 6.13. Drawing on floorspace and other data derived from WSP and other sources, we have adopted a conventional step-by-step, trade draw methodology to assess retail impact. This is based on an estimate of store turnover in the 'design' year (2027), and a series of judgements relating to the proportion of turnover estimated to be diverted from existing centres and stores.
- 6.14. These judgements reflect factors such as scale, nature of retail offer, location/distance, and the extent of 'trading overlap' (or competition), underpinned by the principle of 'like competing with like'. Proximate facilities with a similar catchment, and trading in the same market sector, will experience the greatest impacts applying these principles. Conversely, distant facilities of a differing scale and nature (such as local facilities and convenience stores catering for day-to-day needs) will be far less likely to experience diversion of trade.
- 6.15. This methodology is widely applied in retail assessment work and reflects that advocated in relevant national guidance (Planning Practice Guidance, para 018 Reference ID: 2b-018-20190722). This approach is logical, robust, transparent, and proportionate.
- 6.16. There are five main steps underlying this approach:
- Step 1: define a catchment area and quantify population and spending
  - Step 2: identify base and design years for the assessment
  - Step 3: estimate the turnover of existing centres and retail destinations
  - Step 4: estimate the turnover of the application proposal and retail 'commitments' (other proposals in the catchment area with planning permission)
  - Step 5: apportion the turnover of the subject proposal to stores/centres using a trade draw methodology, based on an understanding of location/proximity and the extent to which the proposal will compete with existing facilities (centres and schemes in the same market sector having the greatest propensity to divert trade from comparable facilities); quantify trade diversion (impact) – both 'solus' and 'cumulative'; and assess the significance of the predicted impacts for established centres.
- 6.17. Impact within the assessment is expressed as a percentage of existing centre/retail destination turnover diverted to the proposal in the design year.

## Assumptions and Assessment Parameters

- 6.18. The principal supporting assumptions and assessment parameters adopted within our analysis are as follows:
- 6.19. **Base and design years:** base year of 2022 (the current year) and design year of 2027.
- 6.20. **Price Base:** constant 2019 prices.
- 6.21. **Catchment Area:** this has not been defined explicitly; however, it is assumed that expenditure will be drawn to the proposal from Totton (town centre and out-of-centre floorspace), and other centres and retail facilities to the east of the River Test in Southampton.
- 6.22. **Turnover of existing convenience stores and comparison floorspace:** derived from WSP 2020 (Aldi, Millbrook), Revised Tables 2 and 4, updated to allow for forecast increases in floorspace efficiency.
- 6.23. **Turnover of proposal:** calculated from net floorspace and the sales density of Aldi derived from Mintel Retail Rankings. The resulting 2022 sales densities are £12,175/sq. m. for convenience goods and £10,728/sq. m. for comparison goods, both at 2019 prices (Appendix 1, Table 1).

## Retail Assessment

- 6.24. Our analysis is set out in a series of tables in Appendix 1. The assessment tables are described below:

### Estimated Turnover of the Proposal (Table 1, Appendix 1)

- 6.25. Table 1 sets out the estimated convenience and comparison goods turnovers of Aldi proposal in both base (2022) and design years (2027). These are based on sales density data published by Mintel Retail Rankings (and verified by Aldi).

- 6.26. The net convenience sales area of the proposed store is 1,052 sq. m. Applying a turnover ratio of £12,175/sq. m. to net convenience floorspace generates a convenience goods turnover of £12.81 million in 2022, increasing to £13.07 million per annum in 2027 (with allowance for floorspace efficiency increases). The estimated comparison goods turnover of the proposal in 2027 is £3.08 million.

#### Convenience Goods Turnover Estimates in 2022 and 2027 (Table 2, Appendix 1)

- 6.27. Table 2 sets out the total estimated convenience goods turnovers of Totton town centre, Totton out-of-centre floorspace and other locations, including Southampton city centre, proximate district centres in Southampton (Shirley and Lordshill) and out-of-centre stores. Destinations included in the table are those adjudged by Planning Potential ('PP') to be relevant to the assessment of retail impacts associated with the Aldi proposal.
- 6.28. This data is derived from Revised Table 2 of the WSP Millbrook Planning Statement. The convenience goods turnovers shown are calculated as a product of net floorspace and sales density data (mostly taken from WSP), updated to allow for floorspace efficiency changes. Turnover estimates for Totton town centre assume the implementation of the planning permission to extend the Lidl store on Commercial Road (see Table 2, footnote 4).
- 6.29. Table 2 shows convenience goods turnover estimates in 2022 and 2027 (the design year) as calculated by PP. The revised baseline turnovers (in 2027) shown in the final column of Table 2 form the basis for the estimation by PP of trade draws and retail impacts (Tables 3 and 5).

#### Solus Convenience Goods Impacts (Table 3, Appendix 1)

- 6.30. Table 3 sets out trade draws (as estimated by PP) and resulting solus retail impacts. The judgements applied by PP in undertaking this exercise reflect those key factors identified at paragraph 2.27 above.
- 6.31. Reflecting relative proximity and 'trading overlap', the proposed Aldi store at Salisbury Road, Totton is estimated to derive the majority of its turnover from Totton town centre and nearby out-of-centre stores, notably the Morrisons store at Spruce Drive. In total, 53% of store turnover is assumed by PP to be drawn from competing retail facilities in Totton town centre and the wider urban area.
- 6.32. The estimated draws from other locations (Southampton, Shirley, Lordshill and out-of-centre stores located to the east of the River Test) are correspondingly lower. Of those locations, higher levels of draw are estimated by PP in the case of Shirley district centre (11.5%), due to its relative proximity to the application site, and competing, out-of-centre stores at Tebourda Way (Tesco) and Brownhill Way (Lidl).
- 6.33. Drawing on this analysis and the earlier tables, we estimate a solus convenience goods impact of -8.5% on Totton town centre in the design year (2027) (Table 3). Lower impacts are predicted on other defined centres: Southampton (-1.0%), Shirley (-2.8%) and Lordshill (-1.8%).

#### Cumulative Convenience Goods Impacts (Tables 4 & 5, Appendix 1)

- 6.34. We have assessed the combined impact of the application proposal and the recently permitted Aldi store at Millbrook. The resulting cumulative assessment is set out in Tables 4 and 5.
- 6.35. Table 4 shows the estimated turnover of the Aldi store at Millbrook in 2022 and 2027. This follows an identical approach to Table 1, with the same Aldi sales densities applied to derive a design year turnover (£13.07 million in convenience goods).
- 6.36. The cumulative impact analysis is set out in Table 5. This shows baseline turnovers (in column 1 - the 'no development' scenario); the estimated draws to Aldi Millbrook and the application proposal; and resulting post-impact turnovers and cumulative impacts.
- 6.37. The trade draws applied to the Millbrook commitment are taken directly from the WSP Planning Statement (Revised Table 3); where draws from Aldi and Lidl have not been specified by WSP, PP has estimated the proportions drawn in each case. Trade draws to the application proposal are taken from Table 3 (Appendix 1) but adjusted to allow for diversion (to Aldi, Salisbury Road) from the Aldi commitment at Millbrook (10% trade draw assumed). Trade draws from other locations are therefore lower than in the solus assessment.
- 6.38. The final column of Table 5 shows the resultant cumulative impacts. We estimate a -12.3% cumulative impact on Totton town centre in the design year, with lower cumulative diversions forecast in the case Southampton, Shirley and Lordshill. Higher impacts are predicted on competing out-of-centre locations, none of which benefit from planning policy protection.

### Conclusions on Retail Impact (Table 6)

- 6.39. The analysis set out in Tables 1-5 (Appendix 1) and described above, and the outputs of our town centre 'health checks', confirm that convenience goods impacts associated with the Aldi proposal should be considered within what should be considered acceptable parameters. The assessment demonstrates that the impact test set by policy is passed in this case. Further detailed analysis in support of this conclusion presented below.
- 6.40. To explore this issue in further detail and to allow for comparison goods trading, we have assessed in broad terms the overall impact of the proposal on the total turnover of Totton town centre and other defined centres in the locality. This analysis is set out in Table 6. This table replicates the analysis set out in WSP Revised Table 4, which helpfully shows overall forecast impacts on key centres.
- 6.41. Table 6 shows the total turnovers of Totton and Southampton, and the Shirley and Lordshill district centres, drawing on our convenience goods estimates (taken from Table 2), combined with comparison goods turnovers derived from WSP (Revised Table 4). WSP's turnover estimates have been revised (by PP) to allow for forecast increases in floorspace efficiency between 2023 and the design year (2027).
- 6.42. Cumulative convenience goods impacts are taken from Table 5. Comparison impacts (associated with the combined comparison turnovers of the application proposal and Millbrook commitment) have been quantified on the assumption that turnover is diverted in proportion to convenience goods impacts.
- 6.43. Based on these assumptions, Table 6 shows an overall cumulative impact of **-6.8%** on the total turnover of Totton town centre in 2027. This scale of overall trade diversion is most unlikely to result in significant adverse impact in our view.

### Assessing the Significance of Impact for Existing Centres

- 6.44. The NPPF identifies the key impact considerations against which planning applications for retail uses (in edge or out-of-centre locations) should be assessed. Two main factors are identified a paragraph 90: (a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and (b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
- 6.45. The NPPF states (at paragraph 91) that where an application is likely to have significant adverse impact on one or more of the considerations in paragraph 90, it should be refused.
- 6.46. We consider these matters below.

### Investment Impacts

- 6.47. We are not aware of any planned investment in Totton or other centres that might be affected by the proposed development. In any event, the levels of impact identified in our quantitative assessment are low in absolute terms. The levels of diversion identified would not in our view deter future investment in the existing centres or undermine investor confidence in the deliverability of future investments.
- 6.48. We therefore conclude that there are no alternative investments that would be prejudiced by the application proposal.

### Vitality and Viability, Consumer Choice and In-Centre Trade/Turnover

- 6.49. Having regard to the conclusions of the retail impact assessment as set out above, and the nature, function, and health of the town centres' retail offer, we do not consider that the Aldi proposal would undermine the vitality or viability of Totton or other existing centres. Overall impacts on Totton town centre are -6.8% (Table 4) in the design year (2027). Such impacts are well within acceptable parameters and could not be considered 'significantly adverse' in our view.
- 6.50. The significance of impact, rather than evidence that some trade will be diverted from existing centres, is the primary consideration. In this case, our analysis indicates that the Aldi store will divert some expenditure from Totton and other existing centres, but not to the extent that such impacts could be considered significant or give rise to policy conflict. Impacts on consumer choice will be positive but without detrimentally affecting the vitality and viability of defined town, district, or local centres.
- 6.51. We therefore conclude that retail impact on vitality and viability is acceptable in planning policy terms, and that in-centre trade and turnover will not be materially affected by the application proposals.

## Overall Conclusions of Retail Assessment

- 6.52. Based on the analysis in this chapter and the supporting tables in Appendix 1, we conclude that the application proposal complies with the NPPF 'impact test', and with Policy ECON5 of the adopted Local Plan.

## 7. Other Material Considerations

### Principle of Development

- 7.1. The principle of the application site's development is already clearly established, both through recent extant planning permissions and through the up to date allocation of the site within the New Forest Local Plan. Land at Little Testwood Farm has a site-specific allocation within the adopted Local Plan Part 2: Sites and Development Management (2014) through Policy TOT12. This policy identifies the site for employment development in accordance with Core Strategy Policy CS18. In this context, paragraph 7.5 of Local Plan Part 1 sets out that employment uses comprise: industrial, office, business, storage and distribution uses falling within use classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987.
- 7.2. The Policy specifically requires provision of vehicular, pedestrian and cycle access from Salisbury Road, retention of important trees, additional landscaping on the boundaries, retention and enhancement of the watercourse, and an assessment of potential contamination. It is, nevertheless, clear demonstration that the site is considered by the Local Planning Authority to be an appropriate site for development, and the employment unit element of this application clearly complies with the policy requirements for the site.
- 7.3. In this context, the site has benefitted from two previous planning permissions, which proposed the development of four industrial units (Class B1c, B2 and B8), with ancillary trade counter uses and parking (ref. 18/11691 and 20/10109). These permissions date from 2018 and 2020 respectively and have not been implemented, although one remains extant and capable of implementation.

### 'Loss' of Employment Land

- 7.4. It is accepted that the foodstore element of the application does not fall within the definition of employment uses that are set out in paragraph 7.5 of the Local Plan Part 1, albeit it should be acknowledged that the use classes order has subsequently been amended, and the 'office' uses referred to in Local Plan Part 1 paragraph 7.5 would now fall within the same use class as retail uses (Class E).
- 7.5. Nevertheless, given the foodstore element does not comply with the site-specific policy requirements, Policy ECON2 of the Local Plan Part 1 (Retention of Employment Sites and Consideration of Alternative Uses) is a relevant consideration. Part (ii) of the Policy sets out that other uses requiring planning permission will be supported provided that:

*"For other non-employment uses, it is demonstrated that the employment site is no longer suitable or viable for continued employment use, by submission of proportionate evidence showing that:*

- a. The condition of the site or building renders it unsuitable for its present or any other realistic and appropriate employment use, and it would not be viable to refurbish or redevelop the site for an alternative employment use: and/or*
- b. The site has been actively but unsuccessfully marketed for employment use on unrestricted terms fair to potential occupiers and at a realistic price, for a minimum period of twelve consecutive months prior to the date at which the planning application for an alternative use was submitted."*

- 7.6. Part (ii) (a) of Policy ECON2 is not a relevant matter for this application, and evidence is therefore provided with this application to respond to Part (ii) (b) of the Policy. Supporting text to the policy confirms that *"Given the extent of permitted development rights, a marketing period of twelve months for sites that do not benefit from permitted development rights will help to ensure that employment re-use and re-development options are properly tested and not unduly affected by short-term market fluctuations. Marketing should include notices visible to passing traffic at the site location, and advertisements in relevant commercial property press (including online press). The property should be offered at a price commensurate with its condition, location and potential occupiers. Marketing evidence should document all these details and provide a log of enquiries and offers made by potential occupiers."*
- 7.7. The marketing report history for the site is provided in detail within the letter (dated 14 June 2021) from the agents that were leading the marketing of the site (Hellier Langston). This confirms that marketing of the site initially commenced prior to the submission of the original planning application for employment development at the site. Notwithstanding the submission and approval of that application, further marketing continued, including prior to the submission of the subsequent application and approval.
- 7.8. Despite this marketing and the grant of planning permission on two occasions, no genuine or proceedable interest was received from an occupier for the site as an employment location alone. We therefore consider that the requirements of Local Plan Part 1 Policy



ECON2 (specifically part (iii)) are met in this instance, and the 'loss' of part of the site for employment uses should be deemed acceptable.

- 7.9. In any event, it must also be recognised that this planning application does continue to provide a significant element of employment accommodation, which will be capable of being constructed alongside the Aldi foodstore. The site will not be 'lost' in its entirety from an employment location, and given the commercial attractiveness of an Aldi store, the prospects of the employment site being delivered for that purpose is enhanced significantly. We therefore consider that the proposed development should be concluded to be both appropriate and desirable in delivering beneficial employment generating uses.

### Design and Landscaping

- 7.10. A detailed description of the site's design and the scheme's evolution is set out in the accompanying Design and Access Statement. Much of the design context is informed both by the existing surroundings and nature of the land, and the design approved on the site previously (for commercial units and infrastructure).
- 7.11. The site is currently an undeveloped area of scrubland and disturbed ground, which is served by an established access road that also provides access to the Totton AFC ground to the south-east. Light vegetation characterises the surrounding boundaries, with more established hedgerows and trees on the southern site boundary. Relevant policy for the site emphasises the retention of much of the established landscaping, and this is reflected within the proposal submitted.

### Scheme Design

- 7.12. The application seeks detailed planning permission for both the Aldi store and the adjacent employment unit. Road infrastructure improvements and amendments to an adjacent watercourse are consistent with the extant planning permission for the site (ref. 20/10109). A total of 191 car parking spaces are proposed, of which 144 will provide parking for Aldi customers and 47 will provide parking for the employment unit. Active and passive electric vehicle charging points are proposed.
- 7.13. Given the varied nature of materials used in the surrounding area, neither the Aldi store or employment unit draw any particular design influence from the area. The design of the Aldi store is simple in form and materiality, with a single-storey building and shallow mono-pitch roof. The store's shopfront forms the site entrance and is articulated by a cantilevered canopy and full height glazing. Above a brick plinth, the remaining building facades are a combination of grey metal cladding panels.
- 7.14. The employment unit has a slightly different form and scale, but retains similarity with the use of metal cladding. The building itself is taller than the Aldi and has a simple pitched roof. The elevations are punctuated with glazed elements, but the building necessarily has less active frontage than the foodstore.

### Landscaping

- 7.15. The proposed landscape strategy and management plan is set out in detail within the application documentation, and is designed to mitigate any loss of existing trees and to improve local amenity. New landscaping (with native species) is proposed to ensure a benefit to local amenity and wildlife. A detailed landscape plan is included within the Landscape Management Plan (Tyler Grange, March 2022).

### Highways and Access

- 7.16. Full details of the proposed highways and access arrangements are set out in the submitted Transport Assessment (Entran, April 2022) and a draft Travel Plan is proposed for the site. To reflect the policy requirements of the site, the proposed access arrangements continue to provide access to the adjacent Totton AFC and are largely consistent with the scheme that has already been permitted for the site (20/10109).
- 7.17. Full details of the anticipated traffic generation for both the foodstore and employment unit are set out in the Transport Assessment, together with an analysis against the previously approved development. This demonstrates that the access arrangements are appropriate, safe and will not cause any detrimental impact to highways safety. It also demonstrated that the proposed car parking is appropriate to the location and will be sufficient to meet the requirements of the development.

### Ecology and Amenity

- 7.18. The application proposals have been subject to both a Preliminary Ecological Appraisal (Tyler Grange, May 2022) and a Landscape and Visual Appraisal (March 2022). Both documents are submitted with the application and demonstrate that the scheme should be

considered acceptable. The Preliminary Ecological Appraisal includes both a bat roost assessment and Bio-Diversity Net Gain (BNG) assessment.

#### **BREEAM**

7.19. Two separate BREEAM pre-assessment reports have been prepared for the Aldi store and employment unit. In accordance with Local Plan Policy IMPL2, both buildings are designed to achieve an 'Excellent' rating.

#### **Drainage and Contamination**

7.20. A details Drainage Strategy is proposed for the application site (Craddys, June 2022), which sets out both a surface water and foul water drainage strategy is proposed. The surface water will discharge into the adjacent watercourse, with surface water from hardstanding areas collected through drainage channels and gullies, passing through an oil receptor. Foul water will be dispersed to the existing public sewer.

7.21. The site has been subject to a Flood Risk Assessment and has been confirmed to be at low risk of flooding.

## 8. Summary and Conclusions

- 8.1. This Planning and Retail Statement is submitted by Planning Potential, on behalf of Aldi Stores Limited (Aldi), in support of a full planning application for a new Aldi foodstore (Use Class E) and general industrial/distribution uses (Class B2/B8) on land at Little Testwood Farm, Salisbury Road, Totton SO40 2RW.
- 8.2. The description of development proposed is:
- “Full planning permission for the erection of a Class E foodstore (1,890sqm gross), with associated access, car parking and landscaping, and the erection of a Class B2/B8 employment unit (1,848sqm gross), with parking and landscaping.”*
- 8.3. The application site has a detailed planning history, and benefits from an extant planning permission for the development of industrial units (Class B1c, B2 and B8), with ancillary trade counter uses, parking, service yards and landscaping (ref. 20/10109). That permission is material to the consideration and assessment of this new planning application.
- 8.4. It is also important to note that the application site is designated for employment development in accordance with Core Strategy Policy CS18 and Local Plan Part 2 Policy TOT12. Although the site does benefit from permission for employment uses, that development has not come forward, and this new application provides the opportunity for the proposed Aldi store (Class E) to act as an enabling development for the Class B2/B8 employment unit. The current proposal will, therefore, provide employment generating uses, as envisaged within local policy.
- 8.5. The application submission proposes the development of Class E retail uses on a site that is not within a designated town centre. Retail policy matters (as set out at both the national and local level) are therefore relevant to the determination of the proposals.
- 8.6. A sequential assessment has therefore been undertaken for this development proposal. This assessment is based on information regarding the potential availability and suitability of alternative sites, and policy guidance set out in the New Forest Local Plan Part 2 Policy TOT15.
- 8.7. Our review of relevant local policy, site visits and research has identified sites worthy of consideration as part of the sequential assessment. Planning Potential has undertaken a review of these sites. The analysis sets out why none of these sites represents suitable, available, or viable sequential alternatives for a new discount foodstore proposal of the broad scale and type that form this planning application.
- 8.8. For the avoidance of doubt, we have also considered whether there are any other sites outside the town centre, but with better connections to it, and have not identified any suitable opportunities. It is considered unnecessary to analyse any further sites within Totton, as any such sites are no more sequentially preferable than the application site.
- 8.9. On this basis, we conclude that there are no alternative sites within town or edge of centre locations that should be considered sequentially preferable to the application site. The proposed development site is, therefore, considered to represent the only site suitable, viable and available for the broad type of development proposed. On this basis we conclude that the site should be considered to comply with the sequential approach to site selection.
- 8.10. The application site (Salisbury Road) is in an out-of-centre location in retail policy terms. It is situated approximately 2.5km to the north-west of Totton town centre, immediately adjacent to the Totton Football Club site. It is therefore subject to the retail impact test set by the NPPF and Policy ECON5 ('Retail Development and other main town uses') of the New Forest District Council ('NFDC') Local Plan 2016-36 (adopted July 2020). The requirement to provide a retail impact assessment applies only to the proposed Aldi foodstore element of the application proposals.
- 8.11. We have therefore undertaken a retail impact assessment and applied an alternative, 'benchmark' based methodology, which is considered to be both robust and proportionate. This approach assesses the impact of the Aldi proposal against the turnover of existing stores and town centres calculated on the basis of published, average sales densities and net floorspace.
- 8.12. The analysis set out in Tables 1-5 (Appendix 1) and described above, and the outputs of our town centre 'health checks', confirm that convenience goods impacts associated with the Aldi proposal should be considered within what should be considered acceptable parameters. The assessment demonstrates that the impact test set by policy is passed in this case.
- Based on these assumptions, Table 6 shows an overall cumulative impact of -6.8% on the total turnover of Totton town centre in



- 8.13. The NPPF identifies the key impact considerations against which planning applications for retail uses (in edge or out-of-centre locations) should be assessed. Two main factors are identified a paragraph 90: (a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and (b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
- 8.14. The NPPF states (at paragraph 91) that where an application is likely to have significant adverse impact on one or more of the considerations in paragraph 90, it should be refused.
- 8.15. We are not aware of any planned investment in Totton or other centres that might be affected by the proposed development. In any event, the levels of impact identified in our quantitative assessment are low in absolute terms. The levels of diversion identified would not in our view deter future investment in the existing centres or undermine investor confidence in the deliverability of future investments.
- 8.16. We therefore conclude that there are no alternative investments that would be prejudiced by the application proposal.
- 8.17. Having regard to the conclusions of the retail impact assessment as set out above, and the nature, function, and health of the town centres' retail offer, we do not consider that the Aldi proposal would undermine the vitality or viability of Totton or other existing centres. Overall impacts on Totton town centre are -6.8% (Table 4) in the design year (2027). Such impacts are well within acceptable parameters and could not be considered 'significantly adverse' in our view.
- 8.18. The significance of impact, rather than evidence that some trade will be diverted from existing centres, is the primary consideration. In this case, our analysis indicates that the Aldi store will divert some expenditure from Totton and other existing centres, but not to the extent that such impacts could be considered significant or give rise to policy conflict. Impacts on consumer choice will be positive but without detrimentally affecting the vitality and viability of defined town, district, or local centres.
- 8.19. We therefore conclude that retail impact on vitality and viability is acceptable in planning policy terms, and that in-centre trade and turnover will not be materially affected by the application proposals.
- 8.20. All other material aspects of the planning application (e.g. ecology, highways) and considered in detail within the accompanying documentation.

### Overall Conclusions

- 8.21. Based on the analysis in this chapter and the supporting tables in Appendix 1, we conclude that the application proposal complies with the NPPF 'impact test', and with Policy ECON5 of the adopted Local Plan.
- 8.22. We also consider that other material considerations indicate that the proposals are acceptable, and that there are no policy-related matters that would justify the refusal of planning permission. On this basis, the Local Planning Authority is invited to grant planning permission for the development.

