Planning and Retail Statement

Erection of a Class A1 Foodstore and Associated Works

Land at Grove Road, Grove

September 2018

Contents

Appendices

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For and on behalf of GVA Grimley Limited

1. Introduction and Proposals

1.1 GVA is instructed by Lidl UK GmbH (Lidl) to prepare this Planning & Retail Statement in support of a detailed planning application for development comprising a new Class A1 retail foodstore, car parking, access, landscaping and associated engineering works, on land at Grove Road, Grove.

1.2 The description of the proposed development is as follows:-

> *"Erection of a Class A1 retail foodstore with associated car parking, access, landscaping and associated engineering works."*

The Application Site and Context

1.3 The application site extends to 1.48 hectares and comprises an undeveloped field to the eastern side of Grove Road, just to the north of its junction with the A417 Mably Way. To the south the A338 leads to Grove Street and Wantage town centre. To the north it leads to Grove and, via Main Street, to Millbrook Square.

1.4 The application site's northern boundary is formed in part by the access road that leads to the Elms Farm Business Park, and in part by the curtilage of the single bungalow that is accessed from the road leading to the Elms Business Park. Beyond the access to the Elms Farm Business Park is a field parcel which is enclosed by dwellings and farm buildings to the north and a substantial tree belt to the east.

1.5 The Elms Farm Business Park lies just beyond the site's eastern boundary. To the west is the A338 Grove Road and housing accessed from Wolage Drive, as well as an area of open space located in the north-western quadrant of the Mably Way/Grove Road junction.

1.6 Land to the south is currently open agricultural land. This area is, however, subject to significant planned change, with land to the south-east comprising the Crab Hill urban extension for which outline permission was granted in 2015 (P13/V1764/0). The development was described on the application forms as:-

> *"1,500 dwellings including new employment space (Class B1), a neighbourhood centre / community hub (Classes A1, A2, A3, A4, A5, B1, C2, D1 and D2), new primary school, central park, ancillary areas (including allotments and sports pitches) with access off the A338 Grove Road and three accesses off the A417 Reading Road. Provision of a strategic link road between the A417 and the A338 Road to be known as the Wantage Eastern Link Road."*

1.7 The LPA has received applications for the approval of reserved matters and discharge of conditions on a phased basis. The Wantage Eastern Link Road is a key element of the development and will connect with Grove Road at its junction with Mably Way and will run in cutting close to the site's southern boundary.

1.8 Mably Way leads west towards the Grove Airfield site which is also subject to a commitment for major development. Outline permission was granted in 2017 (P12/V0299/0) for development described as:-

> *"Residential development of about 2,500 dwellings with associated services and facilities including secondary school, primary schools, local centre (including uses falling within use classes A1, A2, A3, A4, A5, B1, C2, D1 and D2), open space including community park, and the realignment of Denchworth Road to the south"* [as amended by additional information from agent/applicant dated 23/10/12 and 16/02/15]

1.9 Land to the north of Mably Way and the Newbury Medical Practice, and between the Grove Airfield site and existing development at Wolage Drive is subject to a current planning application for a leisure centre and associated facilities (P/18/V0760/FUL). Land to the north of Upthorpe Drive and to the south of the allotments on Grove Road is also proposed for the development of a Care Home and Extra Care Apartment development.

1.10 In summary, the application site comprises currently undeveloped land on the eastern side of Grove Road. The proposals must, however, be considered in the context of (i) the pattern of existing residential and commercial development to the immediate west, east and north of the site; and (ii) the substantial development and infrastructure works that are planned to the south/south-east (Crab Hill and the WELR), to the west (Grove Airfield and Mably Way) and to the south. These matters are considered further in later sections of this Statement.

The Proposals

1.11 The proposals are shown on the Site Layout Plan and comprise:-

- a discount foodstore of 2,206 sqm gross external area (GEA) with a net sales area of 1,325 sqm
- 126 car parking spaces including 8 accessible bays, 8 Parent & Child bays and 12 cycle spaces
- vehicular access taken from Grove Road via an amended estate road
- ground remodelling and hard and soft landscaping.

1.12 The foodstore will be located in the southern part of the site. It will be single storey with a maximum height of 5.5m on its southern elevation, and with a monopitch roof rising to a maximum height of 6.7m on its northern elevation. The customer entrance will be on the north-west corner of the building. A majority of the western elevation is glazed, with the glazing wrapping around to the northern elevation where the customer entrance is located centrally between two glass panels. A canopy runs above the glazing and provides shelter to those entering and leaving the store, as well as cover to the trolley storage area which is located adjacent to the store entrance. The canopy is also designed to manage thermal gain within the building.

1.13 As a consequence of levels changes across the site there is a need for a substantial cut and fill exercise to be carried out so as to achieve a level gradient between the site access and customer entrance across the car parking area. As a consequence the finished floor level of the proposed foodstore will sit at a similar level to Grove Road, with the store cut into the rear (eastern) part of the site. The foodstore will also sit at a lower level than the surrounding ground to the east and south east. New landscaping is proposed along the boundaries of the site, and as part of the retaining structures, to soften the appearance of the development.

1.14 This arrangement provides the basis for the detailed analysis of the impact of the proposals in the landscape and on visual receptors which is set out within the Landscape & Visual Appraisal (LVA) and which is summarised later in this Statement in the context of relevant planning policy. At this stage we note only that the treatment of levels means that the proposal will not generally be visible beyond the very localised level.

1.15 Pedestrian and cycle access will be provided via a level access from Grove Road to the store entrance, adjacent to the existing crossing on Grove Road. Public transport access is also available via nearby bus stops on Grove Road, providing regular access to Wantage town centre and further afield.

1.16 Vehicular access for staff, customers and delivery vehicles will be via the access road that runs from Grove Road to the Elms Business Park. Minor changes are proposed to the junction of Grove Road and the access to The Elms Business Park, together with the provision of a 'ghost island' (or right turning lane) across the site frontage. Minor changes to the northbound entry to the southern arm of the Grove Road/Mably Way roundabout are also proposed, comprising only alterations to white lining and no physical works.

1.17 The store will be serviced via an enclosed loading bay on its eastern elevation so that all deliveries of goods to the store, and the collection of waste from it, will be carried out within the building. There will be no movement or storage of waste in any outside area. Lidl's foodstores are served by typically 1 to 2 HGV deliveries per day. These deliveries also take waste back to the regional distribution centre helping to reduce the number of traffic movements at Lidl's sites and reducing emissions as a consequence. The number of deliveries may be higher at peak seasonal times but will remain typically, no more than 2 to 3 per day.

Pre-application Consultation

1.18 Lidl has sought pre-application advice from the Vale of White Horse District Council (VOWH) as Local Planning Authority (LPA). A pre-application meeting was held on 23 July 2018. At the time of writing the applicant awaits a written response from the Case Officer, although has been provided with various consultation responses.

- In relation to policy relating to **new retail development and centres** the LPA has asked Nexus Planning to comment on the methodology of the sequential and impact assessments that GVA set out in a Scoping Note which accompanied the request for pre-application advice. It is assumed that Nexus may be asked to comment formally on the completed sequential and impact assessments in due course.

- In relation to **landscape considerations** the Council's landscape architect has provided general comments on development plan policy, and confirmed the extent of the relevant evidence base. Since the request for pre-application advice was submitted the applicant has made substantial progress in relation to site layout, design and regrading. This is articulated by the Site Layout and Site Sections and is described in the Design & Access Statement (D&AS). Moreover, the Landscape & Visual Appraisal (LVA) has since been prepared and assesses the impact on landscape and visual receptors having regard to the policy and evidence base identified in the consultation response and adopting best practice assessment techniques. This material was not available to the Council's Landscape Architect.

- The Council's **urban design** officer has also commented on the basis of the proposals as they stood at the time that the request for pre-application advice was submitted. The officer's comments relating to proposed levels, retaining structures, sections and implications for visual amenity are addressed in the final submissions, including the Site Layout, Site Sections, Design & Access Statement and LVA.

- The Highway Authority has also provided comments on **access and transport** issues, but only on the basis of the Site Layout Plan, rather than the detailed assessment that is included in the Transport Assessment.

1.19 Other consultee's comments, and the LPA's overarching response, will be reviewed on receipt.

Community Engagement

1.20 A public consultation information event has been organised for 20 September 2018 from 3pm to 7pm at the Old Mill Hall in Grove. The event will be publicised by way of press advert and notices being posted around both Grove and Wantage. In addition a consultation website has been prepared which provides additional information in respect of the site to the public. This can be accessed at www.grove.lidl.co.uk. A Statement of Community Involvement will be prepared after the consultation event to provide information about the event and to respond to any comments made.

Submission Documents

1.21 Having regard to the nature of the development, the location of the site, and the policy issues identified during pre-application discussions, the application is supported by the following documents.

- Architectural plans prepared by Nicol Thomas
- Design and Access Statement prepared by fpcr
- Landscape and Visual Appraisal prepared by fpcr
- Landscaping Plan prepared by fpcr
- Preliminary Ecological Appraisal prepared by Estrada Ecology
- Transport Assessment prepared by SCP
- Travel Plan prepared by SCP
- Phase 1 and 2 Ground Investigation Report prepared by CSG Consulting Engineers
- Flood Risk Assessment and Outline Drainage Strategy prepared by SCP
- Lighting Plan prepared by Philips
- Archaeological Desk-Based Assessment prepared by ADAS
- Noise Impact Assessment prepared by Hoare Lea

1.22 The remainder of this Statement is set out as follows.

- **Section 2.0** explains the characteristics of the Lidl business model and the relevance of those characteristics for the application of retail planning policy.
- **Section 3.0** briefly identifies the relevant emphasis and content of the development plan and other material considerations that will have a bearing on the determination of the application.
- **Section 4.0** considers the proposals in respect of retail policy considerations. It comments on the vitality and viability (or 'health') of Wantage town centre, and Grove local centres, and, having regard to the Lidl business model, considers the potential for impact on those centres in qualitative terms. Section 4.0 goes on to provide our quantitative assessment of impact and confirms that, based on our analysis, no significant adverse impact will arise to any centre. In the same section, we explain our findings in respect of the sequential test.
- **Section 5.0** considers other relevant policy, including in relation to Landscape and Visual issues, as well as all other technical matters and concludes that there are no constraints to development.
- **Section 6.0** provides our overall conclusions.

2. The Lidl Business Model

2.1 Lidl operates a particular business model which sets it apart from other main food outlets (with the exception of Aldi) and which is highly relevant to the consideration of its foodstore proposals against the well-established policy tests relating to new retail development and centres. For this reason it is important to fully describe the business model in this section before going on to consider all other matters.

2.2 The increasing popularity of the discount retailers is well known and has been well documented. Indeed, Lidl is now exceptionally well established in the UK, operating in excess of 720 stores from sites and premises both within and outside centres. Its market share is increasing and the Company is expanding its store network considerably, supported by the development of a new UK Headquarters. The UK business model is based firmly on the success of Lidl's operations abroad with approximately 10,000 stores trading across Europe.

2.3 Lidl was characterised by the Competition Commission in its Groceries Market Investigation Final Report (30/04/08) as a **Limited Assortment Discounter** (LAD). The Commission said that LADs:-

> *"carry a limited range of grocery products and base their retail offer on selling those products at very competitive prices. The three major LADs in the UK are Aldi, Lidl and Netto. Each … carries in the region of 1,000 to 1,400 product lines in stores ranging from 500m² to 1,400m² (stores of a similar size operated by a large grocery retailer generally carry about 5,000 products). Aldi, in large part, carries only own label goods while both Lidl and Netto carry larger volumes of branded products".*

2.4 Whilst this report is ten years old, its description of the LAD business model remains sound, albeit Netto no longer trades in the UK; the size of Lidl and Aldi stores has increased to some extent; and the number of product lines sold has increased to circa 1,600 to 2,000. Nonetheless, the clear points of differentiation between the LAD operators, the main grocers (Tesco, Asda, Sainsbury's, Waitrose and Morrisons) and convenience stores remain clear and readily identifiable, with the LAD operators selling limited ranges of staple products and catering predominantly for main food shopping needs.

2.5 The Commission, Inspectors and Secretary of State have expressly recognised that LAD foodstores offer particular benefits of quality and value. Lidl sells a limited number of product lines, but all of its business practices are aimed at driving down costs so that it can provide exceptional value for money across the whole product range. Whereas Lidl currently will typically sell no more than 2,000 product lines, the main grocers will now sell 20,000, and substantially more and the number of value lines that they stock is limited (whereas the whole of the LAD business model is geared to providing exceptional value).

2.6 Consumers no longer assume that the quality of goods sold by LAD operators must be low to achieve cheap prices. Indeed, Lidl is able to offer very competitive prices whilst keeping the quality of its goods extremely high and achieves this through a combination of:-

- tremendous buying power as a result of the scale of its operations across Europe
- a concentration on own brands (now about 80% of its product range) which avoids passing on the cost of brand name marketing to the consumer;
- its decision to stock a much more limited product range than others, concentrating on goods that form a very high proportion of the weekly food shopping needs of most households;
- operating systems that reduce operational costs; and
- simple product display and stock handling procedures.

2.7 The ability to offer a consistent range of high quality goods at competitive prices enables Lidl to distinguish itself from other operators that may be perceived as operating similar business models. The whole of the Lidl product range delivers value whereas the major grocers only stock own brand and 'value' lines amongst their branded and premium products.

2.8 Lidl does not stock convenience goods such as tobacco, or individual confectionary items and stocks limited pre-packed fish and meat and individual fruit and vegetable products. This places it in a different market from most independent retailers. The same issues, coupled with the lack of post office, pharmacy, delicatessen, financial products or other in-house facilities mean that the overlap with conventional supermarkets is limited.

2.9 Lidl stores also offer a limited range of non-food items which typically occupy about 20% of the sales area. These items tend to be one-off specials offered on the basis of 'when it's gone it's gone'. There is no standard or constant comparison goods range offered in store and the special items are wide ranging including anything from sports equipment to electrical items.

Relevance to Planning Policy Considerations

2.10 Delivering the LAD business model has consequences for the design and layout of Lidl's stores. A critical component is the size and configuration of the store which supports Lidl's stock handling procedures and the ability to stock its standard product lines in sufficient depth to minimise servicing costs.

2.11 The restriction that this places on the ability of Lidl to be 'flexible' in its format is relevant to the application of **the sequential approach**. This has been accepted by the Secretary of State and Inspectors in appeal decisions relating to Lidl foodstores, and by very many LPAs in their consideration of Lidl's applications.

2.12 In relation to a proposal in the London Borough of Merton in 2006 the Inspector concluded (and the Secretary of State agreed) that there *"are inherent characteristics of the Lidl business model that limit the scope for flexibility".* Those characteristics were cited as:-

- a store of a size that may accommodate all functions that form the business model
- the need for a high proportion of sales relative to storage space
- a need to enable efficient movement of palletted goods
- the fact that Lidl stores concentrate on selling a limited range of primarily convenience goods which limits the scope for disaggregation.

2.13 In relation to an appeal at Cowley, Oxford in May 2005 the Inspector concluded that Lidl's requirement of a minimum site and gross store size to accommodate its business model was "reasonable for the purpose of the sequential assessment".

2.14 The principles established by these decisions remain relevant under the similar policy relating to retail development and centres which is now found in the NPPF. Moreover, they remain relevant having regard to the increase in floorspace and number of product lines that are sold since the Competition Commission's report, for the reasons set out at paragraph 3.4 above. As a consequence, it remains established that for Lidl to operate its business model it requires:-

- a minimum site size (of circa 0.46ha at the time of the Merton/Cowley decisions)
- a minimum net floorspace (of 1,063m² at the time of the Merton/Cowley decisions)
- adjacent surface level car parking spaces (about 70 at the time of Merton/Cowley)

2.15 These principles were re-established most recently in November 2013 in relation to an appeal in Huntingdon. This post-dated the publication of the NPPF (2012) and so brought up to date the matters covered previously in the Merton and Cowley decisions. In this appeal, the Inspector noted that *"the proposed foodstore and associated car parking would be designed to meet the requirements of the Lidl business model".* In relation to an existing unit which the LPA thought both available and suitable for a LAD foodstore the Inspector noted Lidl's position was that it is critical to its working arrangement that a store is rectangular with wide enough aisles to be able to control the sales floor, move pallets and keep costs to a minimum. Moreover that Lidl's business model *"is not able to function without surface level car parking".* Having regard to the requirement to demonstrate flexibility and the evidence provided by Lidl the Inspector concluded that the alternative store "*would be unsuitable for use by Lidl as a LAD foodstore, particularly as there appears to me to be limited scope or space to make significant changes to the layout or size of the building".*

2.16 In terms of **impact considerations** the limited product range stocked distinguishes Lidl from other retailers including main grocers (Asda, Morrisons, Tesco, Sainsbury's and Waitrose), freezer centres (Iceland) and multiple and independent convenience stores. Moreover Lidl's primary trade is in bulk, not top-up, shopping. It does not compete by virtue of its restricted product range with town centre convenience stores or independent/multiple butchers, bakers and greengrocers.

2.17 The Inspector in the Huntingdon appeal concluded that because Lidl would represent:

> *"… a specialist discount foodstore, I find that there is insufficient evidence to show that it would cause any significant harm to [this] vitality and viability, particularly as it would not compete directly with the retail premises and would be complementary to the activities within the Town Centre".*

2.18 This conclusion must, of course, be read in the context of the composition of Huntingdon town centre and the range of food and convenience retailers present. As we shall explain later, the composition of Grove Local Shopping Centres and Wantage Town Centre, leads to similar conclusions.

2.19 It is worth noting also that Lidl's current store format falls below the threshold of 2,500 sqm (GEA) set out in the NPPF (2018) above which an assessment of impact is always required. However it is open to LPAs to adopt lower, locally set thresholds where that may be justified (having regard to evidence that centres may be fragile and susceptible to even low levels of trade diversion from proposals for new floorspace which are not in centres). For Vale of White Horse District Council, the impact assessment threshold for development likely to impact on Wantage is 1,000 sqm (gross) and 500 sqm (gross) for elsewhere.

2.20 We have therefore undertaken a sequential assessment, a qualitative assessment of centres and a quantitative impact assessment in relation to this application. Our findings in relation to these matters are set out at Section 4.0.

3. The Development Plan & Other Material Considerations

The Development Plan

3.1 Applications for planning permission are to be determined in accordance with the Development Plan, unless material considerations indicate otherwise, and applying the presumption in favour of sustainable development set out in the NPPF (2018).

3.2 The Development Plan for the site comprises:

- the Vale of White Horse Local Plan 2031 Part 1 (adopted December 2016); and
- saved policies from the Vale of White Horse Local Plan (2011).

The Vale of White Horse Local Plan 2031 Part 1 and the Policies Map

3.3 The Vale of White Horse Local Plan 2031 Part 1 (the LPP1) was adopted in December 2016. It includes both District-Wide policies and Sub-Area Strategies with Wantage/Grove falling within the South East Vale Sub Area (**Core Policy 15**). Having regard to the associated Policies Map, the site has no specific allocation but is shown as being located within the Lowland Vale landscape character area (which is to be cross referenced to saved policy NE9).

3.4 **Core Policy 3** sets out the settlement hierarchy for the District, with Wantage identified as a 'Market Town' and Grove as a 'Local Service Centre'. The site is located outside any designated centre and is therefore considered to be 'out-of-centre' applying the definitions in the NPPF. The Adopted Policies Map identifies two locations in Grove as 'Local Shopping Centres' (Milbrook Square and Grovelands) together with one in Wantage (Barnards Way).

3.5 **Core Policy 32** provides the Council's policy in respect of 'Retail Development and Main Town Centre Uses', directing those to the Market Towns (including Wantage) and the Local Service Centres (including in Grove). First priority is given to primary and secondary shopping frontages and identified redevelopment sites. In accordance with the approach set out in successive government policy statements, and most recently in the NPPF (2018), the policy states that:-

> *"Proposals for retail or other main town centre uses that are on the edge of or outside the town or local shopping centres and are not supported by Local Plan policies will only be supported if it is demonstrated that the proposal satisfies the sequential approach to site selection, and, where the proposal exceeds the local floorspace thresholds set out below, an impact assessment confirms that there are no likely significant adverse impacts on the vitality and viability of nearby centres. The impact assessment methodology and assumptions are to be agreed with the Council in advance."*

3.6 Wantage town centre is subject to a Town Centre Policy Area boundary (TR6, S4, S5 and S6) as well as Primary and Secondary Shopping Frontages and the Limborough Road Area (**saved Policy S8**), which is identified as the preferred location for any major new shopping provision (which has been built out). We have applied the sequential approach from Wantage Town Centre and from the three Local Shopping Areas identified on the Policies Map.

3.7 **Core Policy 32** confirms that the impact assessment threshold for development likely to impact on Wantage is 1,000 sqm (gross). Accordingly a quantitative impact assessment has also been undertaken and is provided later in this Section and at Appendix 1.

3.8 Other policies of relevance include **Core Policy 33** and **Core Policy 35** which seek to ensure that developments are designed in such a way as to promote sustainable methods of transport and to minimise impact on the road network. Further detail in respect of transport considerations is provided within the submitted Transport Assessment and Travel Plan.

3.9 **Core Policy 37** is the LPA's policy on Design and seeks to ensure that proposals are of high quality design that responds to local distinctiveness. **Core Policy 44** is the LPA's policy on landscape and seeks to ensure that new development takes account of landscape features and incorporates landscaping within the design of new development. Further consideration is given to design and landscaping within the submitted D&AS and the LVA.

3.10 The Policies Map shows land to the immediate south of the site allocated as part of the strategic housing allocation at Crab Hill (**Core Policy 4**). Outline planning permission has been granted for this site and provides some context for the determination of this application. Further consideration is given to these matters in the D&AS and LVA.

Vale of White Horse Local Plan 2011

3.11 The Vale of White Horse Local Plan (VOWH Local Plan) was adopted in 2011. It has now been replaced in part by the Local Plan 2031 Part 1 although a number of policies are saved until replaced by the emerging Local Plan 2031 Part 2 (LPP2).

3.12 Saved **policy NE9** relates to the potential impact of development on the Lowland Vale and states that:

> *"development in the Lowland Vale will not be permitted if it would have an adverse effect on the landscape, particularly on the long open views within or across the area."*

3.13 Further consideration to this is given within the LVA and at Section 5.0 of this Statement.

3.14 **Policy H5** relates to the 'Strategic Housing Site West of Grove airfield' which, in a similar way to the Crab Hill site, provides some context to the consideration of this application. The policy allocates land at the former Grove airfield for a mixed use development comprising 2,500 dwellings; a mixed use local centre including a supermarket; schools; and other associated infrastructure. As set out in Section 1.0 the site now has outline planning permission (P12/V0299/0 as amended by P/17/V3130/FUL).

Other Material Considerations

The National Planning Policy Framework (NPPF)

3.15 The NPPF was published in July 2018 and sets out government's planning priorities for England. Underpinning the NPPF is the presumption in favour of sustainable development. This must be applied to both plan-making and decision-taking and reflects a desire for the planning system to positively and proactively support sustainable economic growth. In this regard, Lidl's proposal is for economic development and will deliver employment opportunities at the local level.

3.16 The NPPF adopts a 'centres first' approach to the location of new retail development. The objective is to promote competitive town centre environments on the basis that town centres generally lie at the heart of communities so that their vitality and viability should be supported.

3.17 Paragraphs 86 and 87 confirm that LPAs should apply a sequential test to applications for main town centre uses not in an existing centre and not in accordance with an up to date local plan. It confirms also that flexibility must be demonstrated by applicants and LPAs in respect of store format and scale. Applicants should consider the opportunity to deliver their services in, for example, reduced or non-standard store footprints and with reduced levels of parking. A sequential test has been undertaken and is provided at Section 5.0 of this Statement.

3.18 In relation to the assessment of impact arising from applications for main town centre uses that are not in a centre, paragraph 89 confirms that the default threshold for requiring an impact assessment is 2,500 sqm (GEA) or any lower, locally set threshold. The lower, locally set threshold for the District is 1,000 sqm (gross) for any proposals that might impact on Wantage and 500 sqm (gross) for elsewhere. Accordingly a quantitative impact assessment has been undertaken and is provided at Section 4.0 of this Statement.

Draft Local Plan 2031 Part 2

3.19 The draft Local Plan 2031 Part 2 (Detailed Policies and Additional Sites) (LPP2) was submitted for examination on 23 February 2018. The LPP2 complements the LPP1 and sets out policies and locations for certain housing sites, and further detailed development management policies.

3.20 The Draft Policies Map shows the site as being adjacent to the settlement boundaries of both Grove and Wantage. The LPP2 advises that the council recognises the importance of *"safeguarding the separate identity and characteristics of individual settlements as well as the open gaps that help separate these places"*. **Draft Policy 29**: 'Settlement Character and Gaps' says that proposals will be considered in the context of **Core Policy 4** in the LPP1 and *"will only be permitted provided that:*

- *the physical and visual separation between two separate settlements is not diminished;*
- *cumulatively, with other existing or proposed development, it does not compromise the physical and visual separation between settlements; and*
- *it does not lead to a loss of environmental or historical assets that individually or collectively contribute towards their local identity".*

3.21 The draft Policy sets out the considerations to be tested but does not represent an embargo on development. We have noted already that the site must be viewed in the context of existing development to the west and south, existing infrastructure to the north, and the proposed strategic highway route to the south. The site is not in close proximity to historical assets and does not have any specific ecological value (see the submitted Preliminary Ecological Appraisal). Further consideration to this matter is set out within the D&AS, LVA and in Section 5.0 of this Statement.

The Wantage Neighbourhood Plan

3.22 The Wantage Neighbourhood Plan was submitted for examination in 2016. The Report of Examination published in July 2016 concluded that whilst a number of policies were acceptable, and could meet the Basic Conditions tests, many could not. The LPA subsequently confirmed that the Plan would not proceed to referendum. Accordingly, the draft Plan carries no weight in the decision making process although we have had regard to its content where that may provide relevant context for the consideration of this application.

Evidence Base

3.23 **The Vale of White Horse Retail & Town Centre Study** was published in 2013. It concluded at the time that there was a surplus of convenience expenditure in the Study Area, up to 2019, indicating a short to medium term requirement for additional convenience goods floorspace over and above the Tesco commitment in Faringdon. In relation to Wantage and Grove, the study's recommendations included that there was:-

> *"capacity for a medium sized foodstore in Wantage/Grove by 2019 (1,300sqm net). However the implementation of a food superstore in Abingdon and the Grove Airfield proposals will reduce this capacity to less than 900sqm net. There is no overriding need to allocate a site for a further foodstore in the short term. In the longer term 2024-2029 there could be scope to develop a store of about 1,600sqm net. However development at Didcot could further reduce food store capacity in Wantage/Grove".*

3.24 An update to the 2013 Study was published in 2017 (**the Retail & Town Centres Study 2017 Update**). In respect of convenience capacity the Update converted surplus convenience expenditure identified into floorspace equivalents using an average sales density of £12,000 per sqm. Having done so, the Study concluded in relation to capacity that:-

> *"The surplus of available expenditure up to 2026 indicates that there is a medium term requirement for additional convenience goods floorspace in the District of 2,135 sqm net (3,049 sqm gross), over and above commitments. Surplus expenditure at 2031 could support 2,585 sqm net of sales floorspace (3,692 sqm gross) in the District as a whole, as shown in Table 13A, Appendix 2".*

3.25 The Update suggests how that may be distributed between centres and, for Wantage/Grove, estimates there is capacity for 1,020 sqm net by 2026 and 1,056 sqm net by 2031. Whilst there is no requirement for applications for new retail development to demonstrate 'need', we note that the evidence base identifies a requirement for additional convenience floorspace within Wantage/Grove, adopting a sales density higher than the most recently reported figure for Lidl.

The Vale of White Horse Landscape Assessment was published in December 2008. It was intended to provide the LPA with advice on the potential landscape implications of further development at Wantage and Grove. The Assessment categorises the site as falling within landscape character area 'LCA1. Elms Farm Hillside' and includes the following narrative.

> *"The A338 forms its western boundary while its northern boundary is a hedgerow by Grove Bridge Farm. Its eastern boundary follows the hedgerows located on the skyline at the top of the hillside to the north and south of Elms Farm. The southern boundary is formed by part of the residential area on the northern edge of Wantage. This area has a steep and very visible open pastoral hillside that is dominated by the large group of farm buildings and trees on the skyline at Elms Farm.*
>
> *Cows are often seen dotted across the fields. Towards the southern end of the area the land use changes to allotments followed by two small pastoral fields with a barn."*

3.26 Further consideration is given to landscape character within the submitted LVA and at Section 5.0 of this Statement. The LVA adopts the relevant content of the Vale of White Horse Landscape Assessment as the basis for its analysis of the potential impact of the proposals on landscape considerations. It also looks at the content of Natural England's National Character Area profiles, and the Oxfordshire Wildlife and Landscape Study (2004).

4. Assessment - Retail and Centres Policy

Scope of Assessment

4.1 We noted earlier that the proposal is for less floorspace than the 2,500 sqm (GEA) threshold above which the NPPF (2018) confirms that it will always be necessary for an **impact assessment** to be undertaken. However, it is open to LPAs to set lower thresholds, where that may be supported by evidence that such an approach is necessary to protect its centres having regard to their levels of vitality and viability. The LPA has concluded that a lower threshold should be applied in relation to proposals that might impact on Wantage and Grove and, accordingly, there is a requirement for an impact assessment in support of this application.

4.2 Our assessment of impact is supported by a commentary on the potential for impact, based on a review of the composition and 'health' of the relevant centres at Wantage and Grove, and on identification of the food and convenience operators present and the extent to which those may anchor the centres.

4.3 There is no floorspace threshold beneath which it is not necessary to assess proposals for out-of-centre retail development against the **sequential approach**. Consequently we have considered whether there are any opportunities to accommodate the development that is proposed more centrally. Our assessment is focussed on Wantage and Grove, which Nexus Planning agree are the relevant centres in this case.

4.4 For these reasons, we start this section by describing the relevant centres in general terms, before setting out our observations in relation to each to inform our conclusions on policy compliance.

The Network of Centres

Wantage Town Centre

4.5 Wantage is identified within Core Policy 3 of the LPP1 as a 'Market Town' in the network of centres. The Policy notes that market towns:-

> *"have the greatest long-term potential for development to provide the jobs and homes to help sustain, and where appropriate, enhance their services and facilities to support viable and sustainable communities in a proportionate manner."*

4.6 The Town Centre boundary is identified on the Policies Map. It comprises two distinct areas; namely a more traditional High Street offer centred around Market Place towards the south of the centre (which contains a large number of listed buildings and comprises part of the Town Centre Conservation Area) and, to the north, a number of large format retail units including Sainsbury's, Waitrose and Kings Park Retail Park.

4.7 The Policies Map also identifies Primary Shopping Frontages and Secondary Shopping Frontages.

- The Primary Shopping Frontages comprise Market Place, Mill Street, the Victoria Cross Gallery, part of Newbury Street and Grove Street, and the western end of Wallingford Street.
- The Secondary Shopping Frontages include part of Grove Street, the east of Wallingford Street and parts of Newbury Street, Mill Street and Church Street.

4.8 The Retail Study (2017) includes an assessment of the composition of the town centre, which was undertaken in October 2016, but does not offer any conclusions in respect of its health.

4.9 The survey identified 13 units in convenience use (8.6% of the total number of units in the town centre). This was consistent with the number of convenience units recorded at the time of the previous survey in 2011. The survey also noted that there had been an increase of seven units in A1 use between 2011 and 2016, and that the number of vacant units had reduced from 24 (in 2011) to 14 (in 2016). The number of vacant units in 2016 represented 9.2% of the total number of units in the town centre and compared favourably with the UK average vacancy rate at the time of 11.8%.

4.10 We visited the centre in July 2018. Our survey concluded that 52% of units within the designated town centre boundary were in A1 use. We noted 8 convenience units, or 4.6% of the total number of units in the town centre, with convenience provision dominated by Sainsbury's on Kings Walk and Waitrose on Wallingford Street. Both stores are served by substantial amounts of adjacent car parking, which also provide a facility for the wider town centre area. The remaining convenience goods units comprised a butcher, sweet shop, McColls convenience store, a delicatessen and a health food shop.

4.11 The number of vacant units in the centre had reduced by 5 since the 2016 survey, with only 9 units vacant, comprising 5.2% of the total number of units in the centre. We noted that the vacant units were small in scale and were dispersed throughout the centre (rather than being clustered in any particular location) and that they varied in scale from approximately 50 sqm to 280 sqm (gross).

4.12 We note that there are a number of national multiples present, although few clothing and footwear operators, as would be expected in a centre of this size. The centre is otherwise supported by a range of services and facilities within and adjacent to the Town Centre boundary, including a library, the Beacon cinema and community centre, community halls and a museum. In addition, there is good provision of banks/building societies, cafes and food and beverage outlets.

4.13 The environmental quality of the centre is excellent, with a substantial area designated as part of the Conservation Area, and with a large number of listed buildings present. The public realm is of a generally very good quality, including the pedestrianised area adjacent to the Market Place which provides a seating area at the heart of the centre and adjacent to the main bus stops.

4.14 Pedestrian and cycle accessibility throughout the centre is good with a number of pedestrian crossing points being present throughout supporting easy and safe access around the centre. Access by public transport is also good, with bus stops provided throughout the centre and services providing access to the wider Wantage and Grove area, as well as further afield. Moreover, car parking is available throughout the centre at Wallingford Street, Market Place, Church Street and Limborough Road.

Barnards Way (Wantage) Local Shopping Centre

4.15 Barnards Way Local Shopping Centre is located within a residential area at the junction of Barnards Way and Bryan Way in the east of Wantage. It comprises a small purpose built row of three units with residential uses at upper floors. In July 2018, the centre comprised a small Premier Newsagent, a podiatry clinic and a small vacant unit. All units were well presented and well maintained. The centre is easily accessible on foot and by bicycle from nearby residential areas. Accessibility by car is also good, albeit with limited parking available. The centre is of a very small scale and meets only local, top-up needs.

Milbrook Square (Grove) Local Shopping Centre

4.16 Milbrook Square local shopping centre is located towards the north of Grove at the junction of School Lane and Main Street, and within a residential area. The centre comprises two buildings/parades dating from the

1970s, arranged around a car park and accommodating 13 units, with residential uses at first floor. On the northern side of the car park is a single storey building which houses Tesco Express and an estate agent. Tesco Express caters predominantly for 'top-up' shopping, rather than for weekly 'bulk' shopping needs given its small size and limited parking. Similarly the McColls caters for local, top-up convenience needs.

4.17 In July 2018 the centre comprised predominantly A1 uses (70%). Convenience provision comprised the Tesco Express, McColls newsagent, a butcher, bakery/cafe and an off-licence. Other uses comprised three hot food takeaways, an optician, bank, charity shop, dry cleaner and funeral director. At the time of visit, on a weekday morning, the centre appeared to be busy with good footfall in most shops and the car park perhaps 80% full. The centre had no vacant units, and a good environmental quality, with both retail units and residential units above being well kept.

4.18 The centre is easily accessible on foot and by bicycle from nearby residential areas. Accessibility by car is good, with a good level of parking provided. Accessibility by bus is also good, with a bus stop located on the eastern boundary of the centre on Main Street, providing regular services to Oxford and Wantage.

Grovelands (Grove) Local Shopping Centre

4.19 Grovelands local shopping centre is located on Blenheim Gardens in the south-west of Grove. The centre comprises two connected purpose built blocks comprising 10 units in total. The first is a single storey unit comprising a Co-operative convenience store. The second comprises retail/commercial units at ground floor and two floors of residential flats above.

4.20 In July 2018 the centre comprised predominantly (70%) A1 uses. Convenience provision comprised the Co-operative convenience store and Premier convenience store/newsagent, both of which cater for only top-up local needs. Other uses comprised a café, pet shop, computer sales/repair shop, betting office, charity shop, tattoo parlour and hot food takeaway. There are no vacant units in the centre which, at the time of our visit, was busy.

4.21 The centre is easily accessible on foot and by bicycle from nearby residential areas. Accessibility by car is good, with the centre having designated car parking. Accessibility by bus is less good with the nearest stops being located on Brereton Drive, approximately 5 minutes' walk from the centre.

Summary

4.22 In summary, we consider that the Town Centre is performing well having regard to the key indicators of vitality and viability that we have reviewed. It has a good level of retail provision, and a low vacancy rate, the latter of which has dropped since 2016. Environmental quality is very good, and the centre is easily accessible by a range of modes, including through walking and cycling.

4.23 The relevant local centres for the consideration of both the impact and sequential tests are Grovelands, Milbrook Square and Barnards Way Local Centres. We have observed that:-

- all are 'anchored' by one or more convenience stores capable of meeting 'top-up' needs;
- none contains a foodstore capable of meeting main food shopping needs;
- there is only one vacant unit in Barnards Way, and none in the other local centres;
- none contain any commitments for new retail development, and none contain any allocated sites;
- all are performing well in their role as centres meeting day to day needs of their local communities.

4.24 Main-food shopping provision is provided by the Sainsbury's and Waitrose, both in Wantage, with the former being on the Kings Park Retail Park at Limborough Road, and the latter being a new unit in the town centre. The Sainsbury's is a full offer store including a bakery, delicatessen, fish counter, restaurant, TU clothing, electrical goods and customer facilities, as well as a petrol filling station. Waitrose is also a full offer store.

4.25 Otherwise, the closest main food shopping facilities are found in Faringdon (Aldi, Tesco and Waitrose), Didcot (Aldi, Asda, Tesco and Sainsbury's), Carterton (Asda, Morrison's and Aldi) and Abingdon (Tesco and Waitrose). The closest discount foodstores are, therefore, some distance away (7+ miles) and there is no Lidl closer to Wantage and Grove than that at Witney, some 13 miles distant.

Assessment

General Propensity for Impact

4.26 We have noted that there is a locally set floorspace threshold in the development plan, above which it is a requirement that applications for new retail development outside any designated centre be supported by an Impact Assessment. We have therefore carried out a quantitative assessment of trade diversion and impact, but set out first the following 'common sense' observations on the propensity for harmful impact to arise in this case.

a) We noted in Section 2 that the LAD model operates on the basis of a restricted range of convenience goods, which distinguishes Lidl from other retailers including the main grocers (Asda, Morrison's, Tesco, Sainsbury's and Waitrose), freezer centres (such as Iceland) and multiple and independent convenience stores. We noted also that Lidl's primary trade is in bulk, rather than top-up, shopping.

b) Adopting the well-established principle that *"like competes with like"* this means that Lidl does not compete with town centre convenience stores, or independent/multiple butchers, bakers and greengrocers. Indeed, the Inspector in the Huntingdon appeal concluded that, because Lidl would represent a specialist discount foodstore:-

> *"I find that there is insufficient evidence to show that it would cause any significant harm to vitality & viability particularly as it would not compete directly with the retail premises and would be complementary to the activities within the Town Centre".*

c) Moreover, Wantage Town Centre is performing well, according to the indicators of vitality and viability that we have reviewed. It has a low vacancy rate, and those units that are vacant are dispersed around the centre. The main foodstores are also performing well.

d) We have noted also that the Local Shopping Centres are performing well in their role, with only one vacant unit in any of the three centres, and will all being supported by at least one convenience store capable of meeting 'top-up' needs. None, however, contains a foodstore capable of meeting main food shopping needs.

e) We have noted also that the evidence base concludes that there is some 'need'(or capacity) for new convenience retail floorspace in the District and in Wantage and Grove.

4.27 These points support a general conclusion that there will be no significant adverse impact on the town centre, or on the District Centres, as a result of Lidl's proposals.

Quantitative Impact Assessment

4.28 In accordance with the requirements set out under Core Policy 32, a quantitative assessment of impact has been undertaken to inform the Council's determination of the planning application. The quantitative assessment is informed by the household survey findings of the Vale of White Horse Retail and Town Centres Study 2013 and 2017 Update ('the Retail Study'). However, the baseline data in the Retail Study (population and per capita expenditure forecasts, and company sales densities) have been updated using the latest information available at 2018. The following methodology and assumptions have been adopted.

a) The study area for this assessment comprises Zones 5 and 6 adopted in the Retail Study. This represents the area from which the proposed store is expected to draw the majority of its trade.

b) **Tables 7a, 7b and 7c** of **Appendix I** illustrate the anticipated pattern of trade draw. Wantage is located within Zone 5, from which the largest proportion of the proposed store's trade is expected to be drawn (approximately 80%) with 15% from Zone 6 (Faringdon) and the remainder from the wider area (5%).

c) The household survey which informs the Retail Study is considered to remain sufficiently up-to-date to support this assessment. The survey indicates that more than 75% of convenience goods expenditure generated by Wantage and Grove residents is being retained and spent at stores within Zone 5, most notably at Sainsbury's and Waitrose in Wantage.

d) The household survey also indicates that around 10% of these stores' trade is being drawn from Zone 6. The degree of market penetration within this area by the proposed Lidl is expected to be slightly higher, given the overlap of its catchment area with that of the recently opened Aldi store at Henry Blake Way in Faringdon. A second LAD foodstore added into the local convenience goods market is expected to pose a degree of competition, given its relative accessibility and proximity, such that the market share of the Aldi will be reduced.

e) A base year of 2018 and design year of 2023 has been adopted. This takes into account the timescales required to achieve an implementable planning permission, with all conditions discharged, followed by site preparation and construction, and allowing for trading patterns to become established.

f) Baseline population and forecast growth in the study area is based on the latest ONS data which has been obtained from Experian Business Strategies at 2017.

g) Per capita expenditure data for convenience and comparison goods within each of the zones forming the Study Area has been obtained from Experian Business Strategies (in 2016 prices) and projected forward by applying the growth forecasts provided by Experian Retail Planner Briefing Note 15 (December 2017). A 2016 price base has been adopted.

h) Deductions for special forms of trading (SFT) (e.g. online and other non-store purchases) have been made to convenience and comparison goods expenditure in accordance with the rates provided by Experian's Retail Planner Note 15.

i) The total convenience and comparison goods expenditure for the study area has been calculated by multiplying the population and per capita expenditure figures for the study of 2018 and 2023.

j) An allowance for the inflow of expenditure from outside the Study Area to relevant stores has been made in accordance with the findings of the household survey. It is assumed that the proposed store will draw 95% of its trade from within the defined study area, with 5% drawn from beyond the area.

k) Based on the latest sales density information available from GlobalData at 2017 and expressed in 2016 prices, the benchmark convenience goods turnover of the proposed store would be approximately £8.94m at 2023. The proportion of turnover derived from expenditure generated within the study area will be £8.44m at 2023.

l) The assessment models the anticipated trading effects of stores which have opened within the Study Area since the household survey was undertaken. These are the Aldi and Little Waitrose stores at Henry Blake Way, Faringdon. Whilst the net sales areas and trade draw assumptions are derived from the planning applications for these stores (P15/V0394/O), turnovers have been calculated on the basis of the latest sales density information provided by GlobalData at 2017 (in 2016 prices).

m) An allowance for changes in turnover efficiency has also been applied in accordance with the rates set out in Figure 4a of Experian Retail Planner Briefing Note 15. Calculation of the proposed store's turnover is set out in **Appendix I, Table 6**. This has similarly been performed in calculating the turnovers of the Aldi and Little Waitrose at 2023 (**Appendix I, Tables 11a and 11b**).

n) The assessment also models in the trading effects of the two convenience stores which are planned within the Crab Hill and Grove Airfield developments. Whilst both are 'permitted' within the relevant outline planning consents for those developments (P13/V1764/O and P12/V0299/O), neither is subject yet to reserved matters approval. This means that the timescale for their delivery is uncertain, and that it is necessary to adopt assumptions relating to the amount of floorspace that each might comprise. Based upon information in the planning applications, and in the evidence base, we have assumed that they will take the form of small convenience stores (or circa 400 sqm gross). In turn, the trading effects of the proposed Lidl store on these commitments have also been assessed to understand cumulative impact (**Appendix I, Table 12b**).

4.29 It should be noted that this assessment does not consider the effect of the proposed store's comparison goods retail element. At just 20% of the net sales area (265 sqm), levels of impact arising from this element would be intangible and cancelled-out by forecast expenditure growth between the base and design years. Moreover, comparison goods sold by Lidl are typically 'one-off' promotional items, providing an ancillary component to the principal convenience goods shopping role of the stores. Consequently impacts are transient and variable in terms of the types of goods sold week by week. Moreover, the quantum of turnover (£1.19m at 2023) would account for just 3.4% of identified expenditure growth within the study area between 2018 and 2023, thus offsetting any impact on existing facilities (see **Appendix I, Tables 5 and 6**).

Impact on existing, committed and planned public and private investment

4.30 We are not aware of any planned or committed investment which would be materially impacted upon by the proposed store. As demonstrated in this section, the level of trade diversion from stores within the defined Study Area will be negligible, having regard to existing shopping patterns, the range and type of goods offered, and the local demographic. As such, it is not considered that the level of trade diversion to the proposed store store will harm the abilty of local business owners to invest in their premises.

Impact on Town Centre Vitality and Viability

4.31 In assessing the financial impact of the proposed store on existing in-centre facilities, it is also necessary to understand the effect of any such proposal on the choice and competition of town centre facilities, and whether there will be any change in vitality levels. Estimated trade diversions and impacts of the proposed store are summarised in **Tables 12a and 12b** of **Appendix I**. A breakdown of the estimated convenience goods trade diversion to the proposed store at 2023 for two scenarios (the first excluding the local centre commitments and the second including them) is provided in **Table A** below.

Table A: Convenience Goods Trade Diversion to Proposed Lidl, Wantage

Store	Trade Diversion to Proposed Lidl (£m) (Excluding Crab Mill & Grove Airfield) (£m)	Trade Diversion to Proposed Lidl (£m) (Including Crab Mill & Grove Airfield) (£m)
Sainsbury's Limborough Road, Wantage	£1.94	£1.94
Waitrose, Wallingford Street, Wantage	£0.42	£0.42
Other Stores, Wantage/Grove	£0.25	£0.13
Tesco / Budgens, Faringdon	£0.59	£0.59
Aldi, Henry Blake Way, Faringdon	£4.48	£4.48
Little Waitrose, Henry Blake Way, Faringdon	£0.17	£0.17
Convenience Store, Crab Hill	n/a	£0.13
Convenience Store, Grove Airfield	n/a	£0.08
Other	£0.59	£0.50
Total	**£8.44***	**£8.44***

**Figure excludes 5% of turnover derived from inflow expenditure.*

4.32 The proximity and relative accessibility of the Aldi store at Henry Blake Way in Faringdon, coupled with the fact that it is currently the only LAD foodstore within the study area, means that it is expected to attract a sizable proportion of its convenience good turnover from Zone 5 – Wantage. The provision of a Lidl at Grove will provide more choice within this sector so that a proportion of those who shop at Aldi shoppers (and particularly those residing in Wantage who will benefit from closer shopping provision) can be expected to switch to the Lidl store. We estimate that approximately 53% of the convenience goods turnover of the proposed Lidl will be derived from expenditure which is currently captured by Aldi at Faringdon. This would equate to a trade diversion of £4.48m at 2023, representing a solus impact of -37% (**Appendix I, Table 12a**). On the basis that the Aldi is out-of-centre, this raises no issues in terms of policy relating to impact on centres.

4.33 Given the limited main food shopping offer within Grove and Wantage, relative to similar sized towns in the region, it is reasonable and prudent to assume that a proportion of the convenience goods turnover of the proposed Lidl will be derived from expenditure which is currently directed to the Sainsbury's and Waitrose stores in Wantage town centre. This takes into account the significant market shares that both stores attract within the study area and, in particular, in Zone 5.

4.34 Whilst the proposed Lidl is expected to draw approximately 5% of its convenience goods turnover from Waitrose, its ability to compete with the Sainsbury's will be greater, given the greater overlap in the goods sold by the respective operators, notably those in the value market segment. Taking this into account, together with the store's relative accessibility to the proposed Lidl, and the limited foodstore offer within the local area, approximately 23% of the Lidl's turnover is expected to be derived from expenditure which is currently captured by the Sainsbury's. The anticipated trade diversions for Sainsbury's and Waitrose would be £1.94m and £0.42m at 2023, equating to solus impacts of -5.2% and -2.0% (**Appendix I, Table 12a**).

4.35 Whilst the impacts upon the Sainsbury's and Waitrose stores in Wantage town centre are considered low, they must also be viewed in the context of the current trading performance of both stores, having regard to their respective survey-derived turnovers, and evidence gathered during visits made as part of the town centre health check conducted for this assessment.

4.36 As demonstrated in **Table 12a of Appendix I** the Sainsbury's and Waitrose stores would continue to achieve residual convenience goods turnovers of £35.16m and £21.04m at 2023, alongside the trading of the proposed Lidl. Both stores trade very successfully and achieve turnovers which are very substantially in excess of the company benchmarks for their size (**Appendix I, Table 13**). To put this into context, the Sainsbury's and Waitrose stores would continue to trade at approximately 142% and 175% of their respective benchmark levels, after the impacts of the proposed Lidl have been accounted for.

4.37 We conclude that Sainsbury's and Waitrose will continue to trade successfully alongside the proposed Lidl, so that there is no risk to the overall vitality and viability of Wantage town centre. The substantially larger net sales area of the Sainsbury's store will also ensure that it is able to compete and retain a significant market share within the Study Area. The solus impact of the proposed Lidl on Wantage town centre as a whole is expected to be -4.1% at 2023, which, when considered in the context of how its principal convenience stores are expected to continue to trade, would not be significantly adverse in planning policy terms.

4.38 The remainder of the convenience goods turnover of the proposed Lidl is expected to be drawn from a number of other stores within and outside of the study area. This will include insignificant proportions from the Local Shopping Centres in Grove, and from the Tesco Metro and Budgens stores in Faringdon. In each instance, impact will be negligible and can be sustained such that stores continue to trade viably.

4.39 In terms of other stores in Wantage and Grove, this is expected to be principally comprised of the small-scale convenience stores which are located in the local centres of Barnards Way (Premier), Millbrook Square (Tesco Express and McColls), and Grovelands (Co-op and Premier). Collectively, the survey-derived convenience turnover for all other stores in Wantage and Grove at 2023 is expected to be circa £14.5m (**Appendix I, Table 10**). In this context, stores within the local centres are expected to achieving healthy levels of turnover and could sustain the small levels of trade diversion that have been accounted for by the assessment. With an impact of just -1.7% on the cumulative turnover of these stores with the trading of the Lidl store at 2023, all are expected to continue trading viably.

4.40 For robustness, the assessment also considers the role of the convenience stores which are planned as part of the Crab Mill and Grove Airfield developments (**Appendix I, Table 12b**). In both instances we have assumed (based on review of the outline applications and evidence base) that they may comprise small convenience stores of circa 400 sqm (gross). The assessment applies standard assumptions on the likely net to gross ratio when calculating the amount of sales floorspace, and the proportion which could be devoted to convenience goods. This would result in relatively small convenience goods turnovers of approximately £1.35m at 2023, assuming the stores were to have been built-out and trading by that time. The analysis in **Table 12b of Appendix I** demonstrates that, by virtue of their scale and function, the two stores will tend to compete with the 'like-for-like' offer of similar sized stores, principally within the Wantage and Grove area. With this in mind, the proportions of the stores' trade that is expected to derived from expenditure which is currently captured by the Sainsbury's and Waitrose stores in Wantage town centre is negligible, resulting in imperceptible levels of impact. Consequently the cumulative impacts of the proposed Lidl and the two convenience stores remain almost in line with the identified solus levels in **Table 12a**.

4.41 Whilst it is difficult to reach precise conclusions on the level of trade diversion from the two committed stores with the trading of the proposed Lidl, given the absence of named operators at this stage, the proposed Lidl is not expected to pose a significant degree of competition due to its principal role as a main-food shopping destination. Cautious estimates of potential trade diversion from the two committed stores are therefore based on the possibility that a small proportion of turnover derived from top-up expenditure could be diverted to the proposed Lidl.

4.42 Given its closer proximity to the proposed Lidl, the amount of trade diversion from the Crab Mill convenience store expected to be slightly higher (approximately £0.13m at 2023) than that from Grove Airfield. However, with potential impacts of -9.4% and -6.3% at 2023, both stores would remain viable propositions. Moreover, both would be expected to attract significant trade from their respective walk-in catchments, and are likely to trade above their expected 'benchmark' levels (GVA's analysis assumes an average sales density of £5,000/sqm being achieved for small convenience stores at 2018). Both stores will also be well-placed to benefit from the significant levels of additional convenience goods expenditure that will be generated by future residents of these developments. This will be significant and, we should note, has been excluded from the expenditure growth forecasts identified in GVA's assessment (**Appendix I, Table 3**).

4.43 In summary the assessment demonstrates that the impacts identified on the convenience goods turnover of Wantage town centre, and other defined centres, are not 'significantly adverse' for the purposes of the application of policy in the NPPF (2018). This has regard to the town centre health-check information which is set out earlier in this Retail Statement.

The Sequential Approach

4.44 Policy requires that applicants and LPAs adopt a sequential approach when considering applications for main town centre uses that are not in an existing centre, and are not in accordance with an up-to-date development plan. The 'centres first' approach means that proposals for main town centre uses should be preferred in town centres before edge-of-centre locations (i.e. those within 300m of the Primary Shopping Area) and with out-of-centre locations to be considered only if suitable sites are not available in or on the edge of existing centres. The assessment should determine whether sites are suitable and available alternatives to accommodate the proposed development, taking into account the need for reasonable flexibility in scale and format. Whilst it is arguable that the sequential test need not be applied from the Local Shopping Centres in Wantage and Grove, given their small scale and their role in providing for *"day to day needs"*, we have nonetheless considered each.

4.45 We have described the LAD foodstore business model and noted that has been expressly recognised as being distinguishable from other types of convenience goods foodstore operators. The NPPF requires that LPAs and operators demonstrate flexibility in the application of the sequential test. There are, nonetheless, instances where there are legitimate constraints to the extent to which certain broad types of retailers (in this case a LAD foodstore) can adopt a flexible approach without prejudicing their operating model.

4.46 We are familiar with the conclusions of the High Court Judgment which related to a developer-led application in Mansfield, where Aldi was the intended operator (known as *Aldergate Properties v Mansfield DC*). The principal point considered was whether it was appropriate to discount any more centrally located sites solely on the basis that the intended operator already traded from the centre within which they are located. The judgment concludes that is inappropriate, and that the approach would artificially circumvent the application of the sequential approach to any centre where the intended operator trades already.

4.47 Some have suggested the effect of the judgment as being to always render the identity of an applicant irrelevant in the application of the sequential test, and that sites should be considered for their suitability and availability for the *"broad type of retailer"* proposed (with *"broad type of retailer"* meaning any retailer that sells primarily food & convenience goods). This approach could mean that the sequential test must always fail in any situation where any more centrally located site (irrespective of size) were available to accommodate any form of convenience retailing. That would represent a mis-application of policy and mis-interpretation of the Judgment.

4.48 Instead the judgment states that the identity of an applicant is not *"generally"* relevant but acknowledges also that *"there are instances where identity may matter"*. Those *"instances"* are not exhaustively defined. Moreover, it is reasonable to take the position that the *"broad type of retailer"* may comprise a LAD operator, rather than any foodstore or convenience store. We conclude that it remains robust to apply the sequential test on the basis that there is only limited scope for LAD retailers to be flexible in the configuration of their floorspace, albeit flexibility must be considered to avoid conflict with the requirements of policy in the NPPF. This is the approach that we have adopted in the application of the sequential test in this case.

4.49 We note also that the 2018 version of the NPPF includes only one change to policy relating to centres with alternative sites to be considered in terms of their availability *"within a reasonable period"*. This does not impact on any conclusion in relation to any alternative sites which may be discounted on the basis of suitability, as opposed to availability.

4.50 Having defined appropriate criteria to be adopted we have considered whether there are any more centrally located opportunities to accommodate the development that is proposed with vacant units, within committed schemes, or on sites allocated for main town centre uses. Our conclusions are as follows.

Vacant Premises within Centres

4.51 Within Wantage Town Centre we have identified only a limited number of vacant units. All are small with estimated floorspace of between 50 and 250sqm (gross). This represents about 5-13% of the gross floorspace proposed by Lidl, confirming that the vacant units are too small to accommodate the development that is proposed, even adopting a flexible approach. The vacant units in the town centre are therefore discounted on the basis that they are unsuitable. We have identified only one vacant unit within the three Local Shopping Centres. The unit, at Barnards Way, is similarly very small and is discounted for the same reasons.

Allocated and Other Sites

4.52 **The Limborough Road** area in Wantage is allocated by saved Local Plan Policy S8 as the preferred site for any major new shopping provision for Wantage. The policy refers to retail uses and parking provision, with office uses to be allowed on upper floor levels. The policy covers a wide area along Limborough Road that is now built out and fully occupied by Sainsbury's, The Original Factory Shop, B&M Bargains, Argos, New Look, Pampurred Pets and Home Bargains. The 2017 Retail Study states that *"the Limborough Road Area (Saved Policy S8) has been successfully implemented and is now occupied".*

4.53 Land to the west of Limborough Road and east of Letcombe Brook (circa 0.5 ha) comprises an industrial unit and car parking and a vacant plot of land and was considered by the LPA as a potential development site within their 2013 Retail Study. We noted at the time of our visit that the unit is occupied. We note also that planning permission was granted in July 2018 (P/18/V0992/FUL) for the vacant plot (which extends to circa 0.2 ha) for an amended design to a previous consent for a new retail unit, offices and 14 dwellings. We assume that this commitment will be implemented.

4.54 Setting aside that a majority of the site is occupied, or subject to recent planning approval, the site is irregular in shape with levels changes adjacent to the industrial unit, and bound to the west by the

Letcombe Brook which may represent a constraint for ecological and/or drainage reasons. The developable area of the site (even assuming that all elements may be considered 'available') is significantly below that required to accommodate the development that is proposed. The constraints arising from its small size are compounded by its irregular shape. Moreover, its development would displace approximately 50 car parking spaces which could not be re-provided and which would impact on parking provision for the existing retail park. This must also be viewed in the context of the reasonable expectation that a LAD foodstore would need dedicated spaces to meet its customers needs. We conclude that the site is, at least in part, not available, and not suitable for the development proposed, even adopting a flexible approach.

4.55 Policy H5 allocates land at the former **Grove airfield** site for a mixed use development which includes a local centre which may include a supermarket/convenience store. For reasons set out earlier we have assumed that the site may accommodate a convenience store of circa 400 sqm (gross). This is too small to accommodate the proposals even allowing for reasonable flexibility. Moreover, there is no centre at present and no reserved matters approval for any centre. We understand that the site is being developed in phases and that the local centre is due to be provided on site prior to occupation of the 1,250th dwelling. Given this timescale, and as enabling works have only just begun on site, we consider that the site cannot be considered available within a reasonable time frame. Having regard to these points we therefore conclude that the site is neither suitable nor available to accommodate the development that is proposed.

4.56 Core Policy 4 designates land known as **Crab Hill**, for a sustainable urban extension. As set out earlier, we understand from the application documents and elements of the evidence base that the centre may include a convenience store of 400 sqm (gross). As with the Grove Airfield proposal, this is too small to accommodate the proposals, even allowing for reasonable flexibility. Also as with Grove Airfield, the site is being developed in phases and, in June 2018, application P18/V1106/DIS amended the phasing strategy for the site. We understand that the neighbourhood centre is within the 'North East' phase and is programmed to come forward between 2022 and 2025. We therefore consider that the site is not available within a reasonable time frame.

4.57 The Wantage Neighbourhood Plan (NP) was submitted for examination in 2016 and included a proposed redevelopment area at **Church Street.** The NP suggested the area could support 2,300 sqm of commercial floorspace, leisure uses, dwellings and parking. The Report of Examination was published in July 2016 and concluded that whilst a number of policies were acceptable, others could not meet the 'basic conditions' tests. Accordingly the NP did not progress to referendum. We note, however, that the Report of Examination considered the Church Street site and concluded that the policy should be deleted for a number of reasons which confirmed that it was not a realistic candidate for inclusion in the NP (on the grounds of ownership, viability and that part was construction for a care home). We have, therefore, dismissed this site.

Summary

4.58 In summary, we have not identified any vacant premises within Wantage town centre or Barnards Way, Milbrook Square or Grovelands local shopping centres that could be capable of accommodating the proposed development, or any substantial part of it. We have reviewed all sites that are allocated in the development plan, and which include elements of retail development, or which are more centrally located than the application site, and, again, have not identified any that could accommodate the proposed development, or any substantial part of it. In all instances, we have adopted a flexible approach, having regard to the legitimate constraints to flexibility that are inherent in the broad type of retailer that is proposed (a Limited Assortment Discount foodstore).

5. Environmental and Technical Considerations

5.1 In this section we consider the proposals in relation to all other relevant policy issues that we identified in our review of the Development Plan in Section 3.0.

Landscape and Visual Impact

Relevant Policy and Evidence Base

5.2 We noted in Section 2.0 that the site lies within the area designated on The Policies Map as the Lowland Vale. Saved **policy NE9** of the VOWH Local Plan is relevant as it sets out the approach to be adopted to planning applications which may have an impact on the Lowland Vale landscape. The policy states that:

> *"development in the Lowland Vale will not be permitted if it would have an adverse effect on the landscape, particularly on the long open views within or across the area."*

5.3 We note that the policy places a 'particular' emphasis on the consideration of potential impacts on long, open views. This is unsurprising in the context of the reference in the supporting text to the contribution that that the Lowland Vale countryside makes in distant and long views, which leads to a concern about potential impacts on *"open vistas"* (para 7.68).

5.4 **Policy NE10** relates to Urban Fringes and Settlement Gaps and says that development in such areas *"as shown on the Proposals Map"* which would harm their essentially open or rural character will not be permitted. The supporting text describes the function and location of the gaps and fringe areas, including that between Wantage and Grove, and Wantage and East Challow (para 7.70 and 7.71 (i)). We note from the Policies Map that the application site is not with any gap or fringe area, with that being confined to the north of Malby Way and to the west of the A338 so that Policy NE10 is not relevant to this proposal.

5.5 **Core Policy 37** (Design and Local Distinctiveness) is applicable to all proposals for new development and expects development to respond positively to the site and surroundings and to incorporate high quality design and landscaping. None of its criteria relate to landscape considerations.

5.6 **Core Policy 44** (Landscape) is to be applied having regard to the various landscape studies prepared by Natural England and the Local Authority. The policy itself seeks to protect *"key features"* that contribute to the nature and quality of the VOWH District's landscape from harmful development. It follows that the extent to which development may be considered to be harmful will fall for consideration (i) against the content of the relevant evidence base and (ii) applying best practice approaches to the assessment of landscape impacts. In this regard, the Applicant has appointed fpcr to carry out a Landscape & Visual Assessment (LVA) which has been prepared in accordance with the methodology in the Guidelines for Landscape and Visual Impact Assessment third edition (GLVIA3). The LVA includes a through review of the various landscape studies referred to in the supporting text to Core Policy 44, namely:-

- Natural England's NCA 108 (Upper Thames Clay Vales) and 116 (Berkshire and Marlborough Downs).
- The Oxfordshire Wildlife and Landscape Study (2004) and the Lowland Village Farmlands LCT.
- The Vale of White Horse Landscape Assessment, Wantage/Grove (2008) and the Elms Farm Hillside Landscape Character Area (LCA1) within the Elms Farm Landscape Character Area (LCA).

5.7 Core Policy 44 is arranged into two parts. The first identifies the 'key features' that are to be protected from harmful development which include trees and hedgerows, views and skylines. The second part applies where development is found to be acceptable in principle, in which case measures will be sought to integrate it into the landscape character of the area.

5.8 **Draft Policy 29** in LLP2 relates to Settlement Character and Gaps and says that proposals will be considered in the context of Core Policy 4 in the LPP1 and will only be permitted provided that:-

- the physical and visual separation between two separate settlements is not diminished;
- cumulatively, with other existing or proposed development, it does not compromise the physical and visual separation between settlements; and
- it does not lead to a loss of environmental or historical assets that individually or collectively contribute towards their local identity.

5.9 Having regard to the content of saved Policy NE9, and the Policies Map, we conclude that draft Policy 29 does not apply, given that the site is not currently considered to be within any gap between settlements.

Assessment of Impacts

5.10 The development is described briefly in Section 1.0 and in detail by the submitted drawings and Design & Access Statement. A key consideration is site topography, which has been addressed by a proposal for substantial regrading so that the foodstore sits at broadly the same level as Grove Road and the site access. This means that the rear (eastern) part of the site is cut into the slope, with the resulting retaining slopes to be constructed in such a way that they may be hydro seeded with grass and wildflowers.

5.11 The detailed and sketch sections included with the drawings pack and in the Design & Access Statement show how the finished floor levels will relate to the retained landform to the north, east and south. These clearly illustrate that the foodstore will sit down within the site, and within its landscaped setting, so that its impact on longer distance views is minimised. Landscaping proposals for all boundaries and slopes are also contained within the D&AS, Landscaping Plans and are summarised in the LVA.

5.12 The LVA applies the GLVIA3 methodology to its assessment of the significance of impact on landscape and visual issues. The conclusions of the LVA in relation to the degree of 'harm' arising support the assessment of the proposals against relevant policy. We note the following key points and conclusions from the LVA.

a) The site is not subject to any national, local or other landscape designations.

b) Applying other landscape assessment factors in GLVIA3, the site and immediate landscape is considered by fpcr to be of 'medium' landscape value (paras 4.21-4.29).

c) In relation to visual impact the site has a restricted Visual Envelope with no long range views (para 4.33). Whilst there are clear views into and across the site from the bungalow to the north and housing to the west, 'localised' views are generally glimpsed, restricted and/or partial.

d) Whilst there will inevitably be some adverse landscape character and visual amenity effects initially, those would be localised and limited in their extent. This is supported by the proposals being set into the slope following ground remodelling and supported by the landscaping proposals on all boundaries and slopes.

e) In terms of landscape character the overall effect is considered to be negligible for NCA 108 (Lowland Village Farmlands). At the local level the effects in the long term (operational phase) will be 'minor-negligible adverse' in relation to the Elms Farm LCA and 'minor adverse' following mitigation in relation to the Elms Farm Hillside parcel.

f) Effects at the very localised site level will be major adverse reducing to 'moderate adverse' upon completion and maturation of the landscaping proposals.

g) Effects for visual receptors will be highest for residents of the bungalow and Wolage Drive (moderate adverse) but will otherwise be negligible in the long term.

Assessment Against Relevant Policy

5.13 We have noted that the site is not identified in any policy statement, or on the Policies Map, as being within any designated 'gap' or 'fringe' area so that policy relating to those matters is not engaged.

5.14 Saved Policy NE9 places particular emphasis on the impact of development on *"long open views within or across the area".* The LVA has confirmed that the proposals will not be visible in any long open views, and that effects are otherwise minor or negligible in the long term, so that there is no conflict with Policy NE9.

5.15 The process required by Policy 44 has been followed with an LVA being prepared in line with the GLVIA3 methodology and having regard to the evidence base. The assessment has concluded:-

- in terms of **landscape character** that the overall effect is considered to be negligible for NCA 108 (Lowland Village Farmlands). At the local level the effects in the long term will be 'minor-negligible adverse' in relation to the Elms Farm LCA and 'minor adverse' in relation to the Elms Farm Hillside parcel. At the very localised level (i.e. the site and its immediate boundaries) effects will reduce to 'moderate adverse' upon completion and maturation of the landscaping proposals.

- in terms of **visual impact** effects for visual receptors that those will be highest for residents of the bungalow and Wolage Drive (moderate adverse) but will otherwise be negligible in the long term.

5.16 We conclude that there is no conflict with Core Policy 44 on the basis of the very limited and localised impacts identified in the LVA. Moreover, the proposals include significant and effective landscaping proposals which are intended to integrate the development into the landscape.

Traffic and Transportation

5.17 A Transport Assessment (TA) has been prepared following scoping discussions with the Local Highway Authority. The site has been assessed in terms of its accessibility by walking, cycling and public transport, with the TA concluding that the site has a good level of accessibility by pedestrians and cyclists, with access to the store directly from Grove Road and the cycle path that runs along it. In addition, the site is well served by bus, with stops adjacent to the site providing regular services to Wantage, Grove and further afield to Oxford, maximising opportunities for the site to be accessed by non-car modes in accordance with Core Policies 33 and 35.

5.18 Vehicular access will be from Grove Road via the existing business park access, which will be widened to support HGV servicing. Swept path analysis indicates that a 16.5m long HGV will be able to satisfactorily enter, service, turn within, and exit the site in a forward gear.

5.19 A total of 126 car parking spaces will be provided including 8 parent & child spaces and 8 disabled spaces. Six Sheffield cycle stands, 12 cycle spaces, will be provided adjacent to the store entrance under the canopy so that they are covered.

5.20 The impact of the proposals on the local highway network has been assessed and widening to two lanes on the southern arm of the roundabout to the south of the site is proposed to improve vehicular flow. As a result, the Transport Assessment concludes that the local highway network has sufficient capacity for the proposals.

Amenity

5.21 A noise assessment has been undertaken to determine any noise implications that might arise as a result of the proposals. The assessment notes that the potential for noise impact is primarily associated with noise emissions from fixed plant and delivery operations. However it concludes that given the high background noise levels for the site, that the proposals will have no impact on the amenity of residents of the nearest existing residential properties (the bungalow to the north and properties to the west of Grove Road).

Flood Risk and Drainage

5.22 The site is within Flood Zone 1. The applicant has, however, prepared a Flood Risk Assessment and Outline Drainage Strategy on the basis that the site is greater than 1 hectare in size, and in accordance with the requirements of the NPPF, a has been prepared. The Flood Risk Assessment and Outline Drainage Strategy confirms that the site is not at risk from flooding sources including surface water and fluvial, and the proposals will not result in an increase in flood risk off-site. It also confirms that the site can be adequately drained.

Ecology

5.23 A Preliminary Ecological Appraisal has been prepared and confirms that ecological considerations do not represent a constraint to the proposed development. The Appraisal does recommend that common reptile species surveys be carried out, to confirm or otherwise whether any reptiles are present on the site. These will be undertaken within the optimum survey window and submitted to the LPA prior to the determination of the application.

Sustainability

5.24 Lidl stores are designed to be as environmentally sounds as possible. For example, the store heating systems are highly efficient condensing boilers which recover waste heat from the combustion process. All heating is regulated by sensors. The canopy of the store is also designed to minimise thermal gain within the building.

5.25 The lighting in the storage and warehouse areas is controlled by movement sensors, which means that lights only turn on when the space is in use. The sales area uses full lighting during trading hours but cuts back to one third lighting before and after trading hours to allow for re-stocking of the store. A Building Management System and LUX sensors control the lighting. This means that lights are only on when necessary during dark periods and ensures that lights do not remain on later than 2 hours after the store closes.

5.26 Lidl also adopts environmentally sound methods in its operation. Waste removal policies comprise the compacting or bailing of waste card and packing materials at its stores. Waste material is then collected on return deliveries to the regional distribution centre, where it is accumulated for recycling. A similar approach is adopted with clear plastics from goods packaging. Efficient removal of waste from Lidl stores reduces the number of vehicles on the road, helping to reduce emissions, noise pollution and congestion. We conclude that the proposals accord with Core Policy 40.

Ground Conditions

5.27 Phase 1 and 2 Ground Investigation Reports have been prepared by Geoinvestigation, which conclude that no contamination has been found on site and, consequently, that no remediation is required.

Archaeology

5.28 A desk-based Archaeological Assessment has been prepared by ADAS in respect of the site. It concludes that there are no known archaeological remains on the site and that archaeological impacts should not be seen as an over-riding constraint preventing the development.

Economic Considerations

5.29 Paragraph 19 of the NPPF sets out a commitment to supporting sustainable economic growth. Paragraph 80 confirms that *"significant weight should be placed on the need to support economic growth"* and, in this regard, the proposals are anticipated to deliver approximately 40 new jobs.

6. Summary and Conclusions

6.1 GVA is instructed by Lidl to prepare this Planning & Retail Statement in support of its proposals for a foodstore at Grove Road, Grove. The development will comprise a discount foodstore of 2,206 sqm GEA with a net sales area of 1,325 sqm.

6.2 An important benefit arising from the proposal is that the store will support circa 40 jobs. Paragraph 19 of the NPPF sets out a commitment to supporting sustainable economic growth and substantial weight is to be attached to proposals that deliver jobs.

6.3 The design of the foodstore is simple and modern. It will be located along the site's southern boundary, with the store entrance on the north-west corner of the building and with its glazed elevation facing Grove Road. The proposal includes 126 car parking spaces located on the northern side of the building, accessed from the road which leads to the Elms Farm Business Park. Minor works to the junction of the access road and Grove Road and to the southern arm of the Grove Road and Mably Way roundabout are required to accommodate customer and delivery vehicles on the highway network.

6.4 As a consequence of levels changes across the site there is a need for a substantial cut and fill exercise to be carried out so as to achieve a level gradient between the site access and customer entrance across the car parking area. The finished floor level of the foodstore will sit at a similar level to Grove Road, with the store cut into the rear part of the site. The foodstore will also sit at a lower level than the surrounding ground to the east and south east. Substantial new landscaping is proposed along the boundaries of the site, and as part of the retaining structures, to soften the appearance of the development and the slopes that are created will be planted with grass and wildflowers.

6.5 A further consequence of site regrading is that the potential landscape and visual impact of the store on the surrounding landscape is minimised. Notwithstanding this, the site is considered within the context of significant urban development at Crab Hill and Grove airfield, as well as the link road just beyond the southern boundary of the site.

Retail Policy Considerations

6.6 The proposal is for new retail development outside any designated centre and on a site that is not allocated for retail use. On this basis, and having regard to the requirements of policy in the development plan and the NPPF the application is supported by an assessment of the potential for any significant adverse impact on any nearby centre (Wantage town centre and Milbrook Square, Grovelands and Barnards Way Local Shopping Centres). The assessment is supported by a review of the composition and 'health' of the relevant centres. In summary the assessment demonstrates that the anticipated impact of the proposals on the convenience goods turnover of Wantage town centre, and the Local Shopping Centres, is not considered to be 'significant adverse' for the purposes of the application of policy in the NPPF.

6.7 It is necessary to consider proposals for out-of-centre retail development in accordance with the sequential approach. This means that proposals for new retail development should be preferred in town centres before edge-of-centre locations, and with out-of-centre locations to be considered only if suitable sites are not available in or on the edge of existing centres. The assessment should determine whether sites are suitable and available alternatives to accommodate the proposed development, taking into account the need for reasonable flexibility in scale and format. Whilst it is arguable that the sequential test need not be applied for the Local Shopping Centres in Wantage and Grove, given their small scale and their role in providing for *"day to day needs"*, we have nonetheless considered each.

6.8 We have not identified any premises within Wantage town centre or Barnards Way, Milbrook Square or Grovelands local shopping centres that would be capable of accommodating the proposed development. We have also reviewed any sites that are allocated in the development plan, and which include elements of retail development, or which are more centrally located than the application site, and again have not identified any that could accommodate the proposed development. In all cases we have adopted a flexible approach, having regard to the requirements of policy and the legitimate constraints to flexibility that are inherent in the broad type of retailer that is proposed (a discount foodstore).

Landscape and Visual Impacts

6.9 The site is not subject to any allocation in the development plan but is located within the Lowland Vale landscape designation. As a consequence there is a need to assess the potential impacts of the development on landscape and visual receptors. This has been done in the form of a Landscape & Visual Appraisal which has been prepared according to best practice methodologies and having regard to the relevant content of various Landscape Studies prepared at the national and local level. The Applicant has concluded as follows.

a) The site is not identified in any policy statement, or on the Policies Map, as being within any designated 'gap' or 'fringe' area so that policy relating to those matters is not engaged.

b) Policy NE9 places particular emphasis on the impact of development on *"long open views within or across the area".* The LVA confirms that the proposals will not be visible in any long open views, and that effects are otherwise minor or negligible in the long term so that there is no conflict with Policy NE9.

c) The process required by Policy 44 has been followed with an LVA being prepared according to the methodology of GLVIA3 and having regard to the relevant content of the evidence base. The assessment has concluded:-

- in terms of **landscape character** that the overall effect is considered to be negligible for National Character Area 108 (Lowland Village Farmlands). At the local level the effects in the long term will be 'minor-negligible adverse' in relation to the Elms Farm LCA and 'minor adverse' in relation to the Elms Farm Hillside parcel. At the very localised level (the site and its boundaries) effects will reduce to 'moderate adverse' in the long term

- in terms of **visual impact** effects that those will be highest for residents of the bungalow and Wolage Drive (moderate adverse) but will otherwise be negligible in the long term.

6.10 We conclude that there is no conflict with policy on the basis of the very limited and localised impacts identified in the LVA. Moreover, the proposals include significant and effective landscaping proposals which are intended to integrate the development into the landscape.

Other Material Considerations

6.11 We have also concluded that there are no technical considerations relating to drainage, highways, noise, or ecology that would impact on the deliverability of the proposals.

6.12 Having regard to the lack of conflict with the relevant policies of the development plan, and the compliance of the proposals with policy in the NPPF, together with the lack of technical, environmental or amenity based reasons why the development may not proceed, we conclude that the proposals are for sustainable development to which the presumption in the NPPF should apply.

GVA

Appendix I
Quantitative Impact Assessment Tables

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Table 1: Population within Study Area

	Zone	
	5	6
2018	33,713	21,220
2023	34,996	22,163

Notes:

1. Population figures derived from Experian Business Strategies data 2018.

Table 2: Per Capita Convenience Goods Expenditure

	Zone	
	5	6
2018	£2,254	£2,249
2023	£2,239	£2,235

Notes:

1. Per capita expenditure data taken from Experian Business Strategies database for each zone and projected forward using forecasts within Retail Planner Briefing Note 15 - Figures 1a and 1b.

2. 2016 Prices

3. Excludes Special Forms of Trading (adjusted to exclude sales from stores) derived from Experian Retail Planner Briefing Note 15, Appendix 3

Growth forecasts:	Year to:	% Change
	2017	0.0%
	2018	-0.6%
	2019	-0.2%
	2020	0.1%
	2021	0.1%
	2022	0.1%
	2023	0.1%

SFT rates:	Year to:	% Change
	2017	3.2%
	2018	3.4%
	2019	3.6%
	2020	3.8%
	2021	3.9%
	2022	4.1%
	2023	4.2%

Table 3: Total Convenience Goods Expenditure

	Zone 5 (£m)	Zone 6 (£m)	Total (£m)
2018	£75.98	£47.72	£123.70
2023	£78.37	£49.53	£127.90

Notes:

1. Total convenience goods expenditure calculated by multiplying population with per capita convenience goods expenditure, by zone.

Table 4: Per Capita Comparison Goods Expenditure

	Zone	
	5	6
2018	£3,651	£3,617
2023	£4,128	£4,090

Notes:

1. Per capita expenditure data taken from Experian Business Strategies database for each zone and projected forward using forecasts within Retail Planner Briefing Note 15 - Figures 1a and 1b.
2. 2016 Prices
3. Excludes Special Forms of Trading (adjusted to exclude sales from stores) derived from Experian Retail Planner Briefing Note 15, Appendix 3

Growth forecasts:	Year to:	% Change
	2017	2.3%
	2018	0.9%
	2019	2.1%
	2020	3.2%
	2021	3.2%
	2022	3.2%
	2023	3.2%

SFT rates:	Year to:	% Change
	2017	14.8%
	2018	15.4%
	2019	15.9%
	2020	16.4%
	2021	16.9%
	2022	17.2%
	2023	17.4%

Table 5: Total Comparison Goods Expenditure

	Zone		Total
	5 (£m)	6 (£m)	(£m)
2018	£123.09	£76.75	£199.84
2023	£144.47	£90.64	£235.12

Notes:

1. Total comparison goods expenditure calculated by multiplying population with per capita comparison goods expenditure, by zone.

Table 6. Turnover of Lidl Store, Grove Road, Wantage

	Total Net Sales Floorspace (sq m)	Benchmark Turnover (2023) (£m)
Convenience Goods	1,060	£8.94
Comparison Goods	265	£1.19
Total	**1,325**	**£10.12**

Notes:

1. Sales densities derived from GlobalData (2016 Prices).

2. Turnover efficiency growth applied from rates in Experian Retail Planner Briefing Note 15, Figures 4a and 4b.

Table 7a. Pattern of Trade Draw to Lidl, Grove Road, Wantage - Main-Food (2023)

	Zone 5	Zone 6	Outside Study Area	Total
Convenience Goods Turnover				
Trade Draw %	78%	15%	7%	100%
Trade Draw £m	£4.88	£0.94	£0.44	£5.82

Table 7b. Pattern of Trade Draw to Lidl, Grove Road, Wantage - Top-Up (2023)

	Zone 5	Zone 6	Outside Study Area	Total
Convenience Goods Turnover				
Trade Draw %	84%	14%	2%	100%
Trade Draw £m	£2.25	£0.38	£0.05	£2.68

Table 7c. Pattern of Trade Draw to Lidl, Grove Road, Wantage - Combined (2023)

	Zone 5	Zone 6	Outside Study Area	Total
Convenience Goods Turnover				
Trade Draw %	80%	15%	6%	100%
Trade Draw £m	£7.13	£1.31	£0.49	£8.94

Notes:

1. Trade draw informed by shopping patterns identified by the Vale of White Horse Retail and Town Centres Study (2013 and 2017 Update), and GVA judgement.

Table 8. Survey-Derived Market Shares of Convenience Goods Stores Within Study Area 2018

Store / Centre	Zone 5 %	Zone 6 %
Wantage Town Centre		
Sainsbury's, Limborough Road, Wantage	38.0%	5.7%
Waitrose, Wallingford Street, Wantage	24.3%	2.9%
Sub-Total	**62.3%**	**8.6%**
Other Within Study Area		
Other Stores, Wantage / Grove	15.9%	0.6%
Tesco / Budgens, Faringdon	3.0%	50.0%
Other	1.6%	14.9%
Sub-Total	**20.5%**	**65.5%**
TOTAL WITHIN STUDY AREA	**82.8%**	**74.1%**
Outside of Study Area		
Waitrose, Abbey Close, Abingdon	0.3%	0.3%
Tesco Extra, Marcham Road, Abingdon	3.9%	1.2%
Other Stores, Botley	0.2%	0.3%
Other Stores, Oxford	0.1%	0.3%
Other Stores, Didcot	10.5%	0.0%
Other Stores, Swindon	0.6%	20.0%
Other	1.6%	3.8%
Sub-Total	**17.2%**	**25.9%**
TOTAL	**100.0%**	**100.0%**

Table 9. Survey-Derived Turnover of Convenience Goods Stores - Summary 2018

Store / Centre	Zone 5 (£m)	Zone 6 (£m)	Total From Study Area (£m)	Inflow %	Inflow £m	Total Turnover (£m)
Wantage Town Centre						
Sainsbury's, Limborough Road, Wantage	£28.87	£2.72	£31.59	14%	£5.14	£36.73
Waitrose, Wallingford Street, Wantage	£18.46	£1.38	£19.85	10%	£2.21	£22.05
Sub-Total	**£47.33**	**£4.10**	**£51.44**	**14%**	**£7.35**	**£58.78**
Other Within Study Area						
Other Stores, Wantage / Grove	£12.08	£0.29	£12.37	12%	£1.69	£14.05
Tesco / Budgens, Faringdon	£2.28	£23.86	£26.14	10%	£2.90	£29.04
Other	£1.22	£7.11	£8.33	10%	£0.93	£9.25
Sub-Total	**£15.57**	**£31.26**	**£46.83**	**12%**	**£5.52**	**£52.35**
TOTAL WITHIN STUDY AREA	**£62.91**	**£35.36**	**£98.27**	**13%**	**£12.86**	**£111.13**
Outside of Study Area						
Waitrose, Abbey Close, Abingdon	£0.23	£0.14	£0.37	0%	£0.00	£0.37
Tesco Extra, Marcham Road, Abingdon	£2.96	£0.57	£3.54	0%	£0.00	£3.54
Other Stores, Botley	£0.15	£0.14	£0.30	0%	£0.00	£0.30
Other Stores, Oxford	£0.08	£0.14	£0.22	0%	£0.00	£0.22
Other Stores, Didcot	£7.98	£0.00	£7.98	0%	£0.00	£7.98
Other Stores, Swindon	£0.46	£9.54	£10.00	0%	£0.00	£10.00
Other	£1.22	£1.81	£3.03	0%	£0.00	£3.03
Sub-Total	**£13.07**	**£12.36**	**£25.43**	**0%**	**£0.00**	**£25.43**
TOTAL	**£75.98**	**£47.72**	**£123.70**		**£12.86**	**£136.56**

Table 10. Survey-Derived Turnover of Convenience Goods Stores - Summary 2023

Store / Centre	Zone 5 (£m)	Zone 6 (£m)	Total From Study Area (£m)	Inflow %	Inflow £m	Total Turnover (£m)
Wantage Town Centre						
Sainsbury's, Limborough Road, Wantage	£29.78	£2.82	£32.60	14%	£5.31	£37.91
Waitrose, Wallingford Street, Wantage	£19.04	£1.44	£20.48	10%	£2.28	£22.76
Sub-Total	**£48.82**	**£4.26**	**£53.08**	**14%**	**£7.58**	**£60.67**
Other Within Study Area						
Other Stores, Wantage / Grove	£12.46	£0.30	£12.76	12%	£1.74	£14.50
Tesco / Budgens, Faringdon	£2.35	£24.76	£27.11	10%	£3.01	£30.13
Other	£1.25	£7.38	£8.63	10%	£0.96	£9.59
Sub-Total	**£16.07**	**£32.44**	**£48.51**	**12%**	**£5.71**	**£54.22**
TOTAL WITHIN STUDY AREA	**£64.89**	**£36.70**	**£101.59**	**13%**	**£13.29**	**£114.88**
Outside of Study Area						
Waitrose, Abbey Close, Abingdon	£0.24	£0.15	£0.38	0%	£0.00	£0.38
Tesco Extra, Marcham Road, Abingdon	£3.06	£0.59	£3.65	0%	£0.00	£3.65
Other Stores, Botley	£0.16	£0.15	£0.31	0%	£0.00	£0.31
Other Stores, Oxford	£0.08	£0.15	£0.23	0%	£0.00	£0.23
Other Stores, Didcot	£8.23	£0.00	£8.23	0%	£0.00	£8.23
Other Stores, Swindon	£0.47	£9.91	£10.38	0%	£0.00	£10.38
Other	£1.25	£1.88	£3.14	0%	£0.00	£3.14
Sub-Total	**£13.48**	**£12.83**	**£26.31**	**0%**	**£0.00**	**£26.31**
TOTAL	**£78.37**	**£49.53**	**£127.90**		**£13.29**	**£141.19**

Table 11a. Turnover of Aldi, Henry Blake Way, Faringdon

	Total Net Sales Floorspace (sq m)	Benchmark Turnover (2023) (£m)	Turnover from Study Area (%)	Turnover from Study Area £m)
Convenience Goods	1,066	£11.99	85%	£10.19
Comparison Goods	188	£1.46	85%	£1.24
Total	**1,254**	**£13.45**		£11.43

Table 11b. Turnover of Little Waitrose, Henry Blake Way, Faringdon

	Total Net Sales Floorspace (sq m)	Benchmark Turnover (2023) (£m)	Turnover from Study Area (%)	Turnover from Study Area £m)
Convenience Goods	585	£7.43	80%	£5.94
Comparison Goods	65	£0.57	80%	£0.45
Total	**650**	**£7.99**		£6.39

Table 11c. Turnover of Convenience Store, Crab Mill Local Centre

	Total Net Sales Floorspace (sq m)	Benchmark Turnover (2023) (£m)	Turnover from Study Area (%)	Turnover from Study Area £m)
Convenience Goods	270	£1.35	100%	£1.35
Comparison Goods	30	£0.13	100%	£0.13
Total	**300**	**£1.48**		£1.48

Table 11d. Turnover of Convenience Store, Grove Airfield Local Centre

	Total Net Sales Floorspace (sq m)	Benchmark Turnover (2023) (£m)	Turnover from Study Area (%)	Turnover from Study Area £m)
Convenience Goods	270	£1.35	100%	£1.35
Comparison Goods	30	£0.13	100%	£0.13
Total	**300**	**£1.48**		£1.48

Notes:

1. Sales densities derived from GlobalData (2016 Prices).

2. Turnover efficiency growth applied from rates in Experian Retail Planner Briefing Note 15, Figures 4a and 4b.

3. Net sales areas for Local Centre convenience stores assume 75% of gross (400 sq m).

4. Inflow calculations for Aldi and Waitrose based upon assumptions set out in the Retail Impact Assessment prepared by Mango Planning and Development, in respect of application Ref. P15/V0394/O.

Table 12a. Trade Diversion and Impact (Excluding Local Centre Commitments)

Store / Centre	Turnover (2018) (£m)	Turnover (2023) (£m)	Trade Diversion to Aldi & Waitrose, Wantage %	Trade Diversion to Aldi & Waitrose, Wantage (£m)	Residual Turnover (2023) (£m)	Trade Diversion to Lidl, Wantage %	Trade Diversion to Lidl, Wantage (£m)	Residual Turnover with Lidl (2023) (£m)	Solus Impact %
Wantage Town Centre									
Sainsbury's, Limborough Road, Wantage	£36.73	£37.91	5.0%	£0.81	£37.10	23.0%	£1.94	£35.16	-5.2%
Waitrose, Wallingford Street, Wantage	£22.05	£22.76	8.0%	£1.29	£21.47	5.0%	£0.42	£21.04	-2.0%
Sub-Total	**£58.78**	**£60.67**	**13.0%**	**£2.10**	**£58.57**	**28.0%**	**£2.36**	**£56.21**	**-4.0%**
Other Within Study Area									
Other Stores, Wantage / Grove	£14.05	£14.50	0.0%	£0.00	£14.50	3.0%	£0.25	£14.24	-1.7%
Tesco / Budgens, Faringdon	£29.04	£30.13	24.0%	£3.87	£26.26	7.0%	£0.59	£25.67	-2.3%
Aldi, Henry Blake Way, Faringdon	£0.00	£0.00	0.0%	£0.00	£11.99	53.0%	£4.48	£7.51	-37.3%
Little Waitrose, Henry Blake Way, Faringdon	£0.00	£0.00	0.0%	£0.00	£7.43	2.0%	£0.17	£7.26	-2.3%
Lidl, Grove Road, Wantage	£0.00	£0.00	0.0%	£0.00	£0.00	0.0%	£0.00	£8.94	0.0%
Other	£9.25	£9.59	0.5%	£0.08	£7.43	2.0%	£0.17	£7.26	-2.3%
Sub-Total	**£52.35**	**£54.22**	**24.5%**	**£3.95**	**£67.59**	**67.0%**	**£5.66**	**£70.87**	**-8.4%**
TOTAL WITHIN STUDY AREA	**£111.13**	**£114.88**	**37.5%**	**£6.05**	**£126.16**	**95.0%**	**£8.02**	**£127.07**	**-6.4%**
TOTAL OUTSIDE STUDY AREA	**£25.43**	**£26.31**	**62.5%**	**£10.08**	**£16.23**	**5.0%**	**£0.42**	**£15.80**	**-2.6%**
TOTAL	**£136.56**	**£141.19**	**100.0%**	**£16.13**	**£142.39**	**100.0%**	**£8.44**	**£142.88**	**-5.9%**

Notes:

1. Trade Diversions for Aldi and Waitrose based upon assumptions set out in the Retail Impact Assessment prepared by Mango Planning and Development, in respect of application Ref. P15/V0394/O

Table 12b. Trade Diversion and Impact (Including Local Centre Commitments)

Store / Centre	Turnover (2023) (£m)	Trade Diversion to Crab Mill %	Trade Diversion to Crab Mill (£m)	Trade Diversion to Grove Airfield %	Trade Diversion to Grove Airfield (£m)	Residual Turnover (2023) (£m)	Trade Diversion to Lidl, Wantage %	Trade Diversion to Lidl, Wantage (£m)	Residual Turnover with Lidl (2023) (£m)	Cumulative Impact %
Wantage Town Centre										
Sainsbury's, Limborough Road, Wantage	£37.10	12.0%	£0.16	12.0%	£0.16	£36.78	23.0%	£1.94	£34.84	-5.3%
Waitrose, Wallingford Street, Wantage	£21.47	6.0%	£0.08	6.0%	£0.08	£21.30	5.0%	£0.42	£20.88	-2.0%
Sub-Total	**£58.57**	**18.0%**	**£0.24**	**18.0%**	**£0.24**	**£58.09**	**28.0%**	**£2.36**	**£55.72**	**-4.1%**
Other Within Study Area										
Other Stores, Wantage / Grove	£14.50	54.0%	£0.73	54.0%	£0.73	£13.04	1.5%	£0.13	£12.92	-1.0%
Tesco / Budgens, Faringdon	£26.26	7.0%	£0.09	7.0%	£0.09	£26.07	7.0%	£0.59	£25.48	-2.3%
Aldi, Henry Blake Way, Faringdon	£11.99	5.0%	£0.07	5.0%	£0.07	£11.85	53.0%	£4.48	£7.38	-37.8%
Little Waitrose, Henry Blake Way, Faringdon	£7.43	3.0%	£0.04	3.0%	£0.04	£7.34	2.0%	£0.17	£7.18	-2.3%
Lidl, Grove Road, Wantage	£0.00	0.0%	£0.00	0.0%	£0.00	£0.00	0.0%	£0.00	£8.94	0.0%
Convenience Store, Crab Mill Local Centre	£0.00	0.0%	£0.00	0.0%	£0.00	£1.35	1.5%	£0.13	£1.22	-9.4%
Convenience Store, Grove Airfield Local Centre	£0.00	0.0%	£0.00	0.0%	£0.00	£1.35	1.0%	£0.08	£1.26	-6.3%
Other	£7.43	10.0%	£0.13	10.0%	£0.13	£7.16	1.0%	£0.08	£7.07	-1.2%
Sub-Total	**£67.59**	**79.0%**	**£1.06**	**79.0%**	**£1.06**	**£68.16**	**67.0%**	**£5.66**	**£71.43**	**-8.3%**
TOTAL WITHIN STUDY AREA	**£126.16**	**97.0%**	**£1.31**	**97.0%**	**£1.31**	**£126.24**	**95.0%**	**£8.02**	**£127.15**	**-6.4%**
TOTAL OUTSIDE STUDY AREA	**£26.31**	**3.0%**	**£0.04**	**3.0%**	**£0.04**	**£26.23**	**5.0%**	**£0.42**	**£25.80**	**-1.6%**
TOTAL	**£152.47**	**100.0%**	**£1.35**	**100.0%**	**£1.35**	**£152.47**	**100.0%**	**£8.44**	**£152.96**	**-5.5%**

Table 13. Benchmark Turnovers (Convenience Goods)

	Net Sales Floorspace (sq m)	Convenience Sales Floorspace (%)	Convenience Sales Floorspace (sq m)	Sales Density (2018) (£/sqm)	Turnover (2018) (£/sqm)	Sales Density (2023) (£/sqm)	Turnover (2023) (£m)
Sainsbury's, Limborough Road, Wantage	2,870	80%	2,296	£10,793	£24.78	£10,707	£24.58
Waitrose, Wallingford Street, Wantage	1,050	90%	945	£12,718	£12.02	£12,617	£11.92

Notes:

1. Sales densities derived from GlobalData (2016 Prices).
2. Turnover efficiency growth applied from rates in Experian Retail Planner Briefing Note 15, Figure 4a.
3. Gross and net sales floorspace figures derived from Vale of White Horse Retail and Town Centres Study (2013 and 2017 Update).