WESTWOOD

AXA

Retail assessment: briefing on proposed approach and key assumptions

7 August 2014

1.0 Introduction

PURPOSE OF BRIEFING

1.1 This briefing sets out CBRE Planning's proposed approach to the preparation of a retail assessment designed to support a proposed allocation in the emerging Mid Devon Local Plan. The proposed allocation is for a major leisure-led development at Junction 27 of the M5 motorway. The retail assessment will focus on the A1 retail elements.

1.2 The briefing will be reviewed by GVA, Mid Devon District Council's retail planning consultants, who will then provide advice on whether they regard the proposed approach as robust and, if not, where it is lacking.

DISCUSSIONS TO DATE

1.3 CBRE met with GVA in early May. At that meeting GVA made clear that they would like to see three issues addressed: need, the sequential test and impact.

STRUCTURE OF BRIEFING

1.4 This briefing is structured as follows:

- Section 2 describes the A1 elements of the proposed development and the turnover we anticipate, based on various assumptions about floorspace and sales densities
- Section 3 describes our proposed approach to the assessment of need
- Section 4 describes our proposed approach to the sequential test
- Section 5 describes our proposed approach to the assessment of impact.

CBRE

2.0 Proposed development

THE WIDER SCHEME

2.1 We will explain that a wider allocation is sought for:

- A major water-based leisure installation
- A cinema
- Two hotels
- A conference/concert venue
- A visitor centre
- A 'Taste of Devon' concept selling, promoting and manufacturing local produce
- 'Activity retail' related to 'activity leisure'
- A plant/horticulture centre
- A designer outlet village
- Supporting food and beverage facilities
- A retirement village
- Commercial and logistics floorspace; and
- Roadside services.

2.2 We will also explain that the aim of the wider scheme is to provide a destination leisure development at a gateway location which will make a major contribution to tourism in Devon and the wider south west. We will also explain that, coupled with commercial and logistics floorspace, it has the potential to create a significant number of new jobs, boosting the local and regional economy.

THE A1 RETAIL ELEMENTS OF THE SCHEME

A 'Taste of Devon' concept

2.3 We will explain that the 'Taste of Devon' concept will offer an opportunity to promote local produce. We will explain that there will be a variety of activities on site, of which retail sales will be one. We will explain that the non-A1 retail sales elements are:

- A restaurant/café (A3 use) of c20,000sqft (1,858sqm)
- A cookery school (D1 use) of c5,000sqft (465sqm)
- A micro-brewery (B2 use) of c10,000sqft (929sqm)
- Food wholesale (B8 use) of c15,000sqft (1,394sqm)
- Food research (B1(b) use) of c5,000sqft (465sqm)
- Food processing and preparation (B2 use) of 20,000sqft (1,858sqm)

2.4 We will go on to explain that the A1 retail sales elements, on which the retail assessment will focus, will be:

- Retail sale of local produce of 18,000sqft (1,672sqm) net sales, i.e. 90% of gross, all of which will be devoted to the sale of convenience goods
- Artisan village of 22,500sqft (2,091sqm) net sales, i.e. 90% of gross, all of which will be devoted to the sale of comparison goods

2.0 Proposed development

- Wine cider centre (which would also have an A4 element, strictly making it a sui generis use) with a net sales area of 233sqm, i.e. 100% of the gross retail area.

2.5 We will explain that the concept would be similar to farmshops with related activities alongside, such as:

- Macknade Fine Foods in Faversham, Kent[1] (which is currently the subject of a planning application to allow it to expand)[2]
- Dart Farm[3]
- Lifton Farm Shop[4]
- Farndon Fields Farm Shop[5]; and
- Greenlands Farm Village[6].

2.6 We will go on to explain that the facility would, however, be somewhat larger than some of these, and almost certainly have a wider catchment.

2.7 We anticipate a convenience turnover of c£11.4m, based on the assumptions set out at Table A1 of Appendix A, notably that the floorspace would have a sales density of c£6,000/sqm, on the assumption that products will be high value but not sold in the same volume as at a foodstore.

2.8 We anticipate a comparison turnover of c£4.2m, based on the assumptions set out at Table B1 of Appendix B, notably that the floorspace would have a sales density of c£2,000/sqm, on the assumption that products will be of a low to medium value and sold in relatively low volume.

'Activity retail' related to 'activity leisure'

2.9 We will explain that the 'activity retail' will be focussed on the sale of goods for outdoor pursuits such as walking, surfing, climbing, camping and mountain biking. We will explain that it will have a floorspace of 60,000sqft (5,574sqm) gross.

2.10 We will explain that the A1 floorspace will complement many of the activities which will take place elsewhere in the Devon Gateway scheme. We anticipate a comparison turnover of c£10.0m, based on the assumptions set out at Table B1 of Appendix B; notably that the floorspace would have a sales density of c£2,000/sqm, which is the mean average of the sales densities achieved by Snow & Rock and Go Outdoors.

The designer outlet village

2.11 We will explain that the proposed designer outlet village will:

- Be a multi-retailer shopping destination

[1] See http://www.macknade.com/ Access date: 29 May 2014

[2] Application to Swale Borough Council (application ref SW/13/1576)

[3] See http://www.dartsfarm.co.uk/ Access date: 7 August 2014

[4] See http://www.liftonfarmshop.co.uk/ Access date: 29 May 2014

[5] See http://www.farndonfieldsfarmshop.co.uk/ Access date: 29 May 2014

[6] See See http://www.greenlandsfarmvillage.co.uk/ Access date: 29 May 2014

2.0 Proposed development

- Specialise in the sale of end-of-range and surplus stock direct to consumers at heavily discounted prices
- Offer discounts ranging from 30-70% off the recommended retail price; and
- Offer high end retailers and brands not available on the majority of high streets.

2.12 We will also explain that it will provide an opportunity for retailers to:

- Sell previous seasons' excess stock
- Sell garments made from excess committed fabric and sample ranges; and
- Offer products for sale at lower levels than in store sales whilst maintaining brand credibility.

2.13 We will further explain that it will, therefore, operate in a complementary way to the high street, with a different retail offer to that available in town and city centres.

2.14 The gross floorspace of the designer outlet village is currently expected to be c180,000sqft (16,722sqm) gross. Assuming that the sales area forms 90% of gross, that implies a net sales area of 162,000sqft (15,050sqm).

2.15 We anticipate a comparison turnover of c£45.1m, based on the assumptions set out at Table B1 of Appendix B, notably that the floorspace would have a sales density of c£3,000/sqm, which is based on an estimate by FSP Retail Consultancy[7].

ADVICE REQUIRED FROM GVA

2.16 We would be grateful for advice from GVA on whether they are content with the:

- Estimated net to gross floorspace assumptions; and
- The assumptions on sales densities and the turnovers they imply.

[7] See http://www.slideshare.net/fspretailconsultant/european-outlet-centres (slide 12) Access date: 28 July 2014

3.0 Need

BACKGROUND

3.1 We think that much of the turnover of the factory outlet centre (and, to a lesser extent, the Taste of Devon outlet and the activity leisure outlets) would be generated by people not resident in the area surrounding the site, i.e. they would be in the area as part of a longer holiday or visiting on a day trip, taking advantage of the site's excellent transport links.

3.2 Nevertheless, we have been asked to consider the extent to which there is a need for the proposed development. In doing so we will examine both quantitative and qualitative need, as is standard practice.

QUANTITATIVE NEED

Overall approach

3.3 The starting point for our assessment of quantitative need will be that:

- There are two main types of goods:
  - Convenience – day-to-day groceries; and
  - Comparison – less frequently purchased, often durable, goods
- In the study area, each individual is forecast to spend a given amount per year on each of these types of goods; and
- The market is currently in equilibrium – this assumes that under current shopping patterns, there is enough floorspace to support available spend.

3.4 We will undertake a telephone-based household survey to provide an up to date picture of trading patterns (see below).

3.5 Building upon the baseline 'equilibrium' position, we will explore the capacity for further convenience and comparison retail floorspace at test dates of 2019, 2024 and 2029.

3.6 The assessment of future need will be prepared on the basis that capacity can arise through one or more of:

- Population growth and/or growth in expenditure per person – more people with more money available to spend means that more floorspace is required
- Improved market share (including 'clawing back' expenditure which can reasonably be regarded as 'leaking' to other locations); and
- Addressing 'overtrading' (typically only for convenience floorspace).

3.7 Key data inputs will include:

- The results of a telephone-based household survey of shopping patterns
- Estimates of population in the survey area, both now and at each of the test dates, which we will source from Experian
- Available expenditure in the survey area, both now and at each of the test dates, which we will source from Experian; and
- Floorspace data for existing retail floorspace.

3.8 The 'spare' expenditure will be set against the anticipated convenience and comparison turnovers of the proposed A1 retail floorspace in order to assess whether there is sufficient headroom for the proposed new development.

3.0 Need

Household survey

3.9 In order to understand current shopping patterns we will undertake a household survey. We will ask a range of questions which reveal people's shopping habits across the study area.

3.10 We will survey postcode sectors fitted as closely as possible to sixty and ninety minute drivetimes. Our draft household survey questionnaire is attached as Appendix C.

Assessment of need for convenience floorspace

3.11 For postcode sectors fitted as closely as possible to a sixty minute drivetime we will calculate the increase in available expenditure between now and each of the forecast dates, taking into account:

- Forecast population growth, which we will source from Experian
- Growth in expenditure per capita, which we will source from Experian for the base date and grow based on the rates in Fig 1a of Experian Retail Planner Note 11 (October 2013)
- Growth in internet-based shopping, which we will base on the rates in Appendix 3 of Experian Retail Planner Note 11 (October 2013), with the suggested an allowance of 70% to allow for shelf-picking
- Increases in floorspace efficiency, which we will base on the rates in Fig 4a of Experian Retail Planner Note 11 (October 2013).

3.12 We may also run additional scenarios based on, for example, an improved market share for the area.

Assessment of need for comparison floorspace

3.13 For postcode sectors fitted as closely as possible to a ninety minute drivetime we will calculate the increase in available expenditure between now and each of the forecast dates, taking into account:

- Forecast population growth, which we will source from Experian
- Growth in expenditure per capita, which we will source from Experian for the base date and grow based on the rates in Fig 1a of Experian Retail Planner Note 11 (October 2013)
- Growth in internet-based shopping, which we will base on the rates in Appendix 3 of Experian Retail Planner Note 11 (October 2013), with the suggested allowance of 70% to allow for shelf-picking
- Increases in floorspace efficiency, which we will base on the rates in Fig 4b of Experian Retail Planner Note 11 (October 2013).

QUALITATIVE NEED

3.14 So far as they are relevant we will examine:

- Deficiencies or 'gaps' in existing provision
- Consumer choice and competition
- Overtrading, congestion and overcrowding of existing stores
- Location specific needs such as deprived areas and underserved markets, and

3.0 Need

- The quality of existing provision.

ADVICE REQUIRED FROM GVA

3.15 We would be grateful for advice from GVA on whether they are content with.

- Our overall approach to the assessment of quantitative need and, in particular, our approach to:
  - The study area and proposed zones
  - The telephone-based household survey
  - Our proposed allowances for internet spending and growth in floorspace efficiency
- Our overall approach to the assessment of qualitative need.

4.0 Sequential test

BACKGROUND

4.1 The NPPF says that:

Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.

4.2 Although it goes on to note that applicants and local planning authorities 'should demonstrate flexibility on issues such as format and scale', there is no requirement in policy for different elements of a proposal to be disaggregated. This was confirmed in the recent call-in decision

4.3 MDDC's retail consultants, GVA, have advised that they accept that the development must be considered as a whole package. Our sequential assessment will, therefore, be focussed on sites which can accommodate the entire development.

APPROACH TO SEQUENTIAL ASSESSMENT

Assessment of availability, suitability and viability

4.4 The extent to which a site is available and suitable and the extent to which development is viable depends on a range of factors which we summarise in Appendix D. We will take this into account in our assessment.

4.5 We will start from the position that the site of the proposed allocation is available and suitable and that development of retail floorspace in the quantum proposed is viable.

Order of search

4.6 We accept that the site of the proposed allocation is at an out of centre location. We are therefore need to consider, in the following order:

- Town centre locations (which, for retail purposes, is the primary shopping area in each centre)
- Edge of centre locations (those sites that are well connected and within 300 metres of the primary shopping area)
- Out of centre sites that are well connected to town centres.

Area of search

4.7 The area of search for sites is dependent upon the role of the proposed development and the market it is intended to serve. We will explain our statement that the development is largely, albeit not exclusively, intended to serve residents of and tourists visiting the West Country.

4.8 As is evident from the drivetime map provided at Appendix E, a development located significantly further to the east/north-east would mean the development would be unable to realistically serve a large proportion of residents of Cornwall, as well as those visiting Cornwall on holiday, as it would involve a journey of more than two hours.

4.9 Similarly, a development located further to the south-west would mean that the development could not realistically serve residents of, for example, the Salisbury and

4.0 Sequential test

Bournemouth areas. The catchment population would, therefore, be insufficient for the development to be viable.

4.10 This leads us to conclude that only centres within a reasonably short distance of the application site could realistically serve the visitors the development is intended to attract and who are required to make the development economically sustainable.

4.11 We therefore proposed to search for alternative sites in and on the edge of the following centres:

- Tiverton
- Exeter
- Exmouth
- Taunton

Flexibility

4.12 We will consider whether a small reduction in floorspace might allow the proposed development to be located elsewhere, albeit the scope to reduce the amount of floorspace whilst retaining a viable scheme is limited.

ADVICE REQUIRED FROM GVA

4.13 We would be grateful for advice from GVA on whether they are content with our proposed approach to the sequential assessment, and specifically in terms of our approach to:

- Availability, suitability and viability
- The order of search
- The area of search
- Flexibility

5.0 Impact

BACKGROUND

5.1 There is no specific requirement in the NPPF to assess impact when allocating sites through the plan-making process, and this is reflected at paragraph 014 (reference ID: 2b-014-20140306) of the Planning Practice Guidance which notes that:

If the Local Plan is based on meeting the assessed need for town centre uses in accordance with the sequential approach, issues of adverse impact should not arise.

5.2 However, we recognise that the Planning Practice Guidance goes on to say that:

The impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centres.

5.3 We therefore propose to address the issue of impact in the same way as the NPPF requires it is assessed for planning applications.

5.4 The NPPF says at paragraph 26 that applications should be refused where there is a '<u>significant</u> adverse impact'

- Existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and/or
- Town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made or up to ten years for major schemes where the full impact will not be realised in five years.

APPROACH TO IMPACT ASSESSMENT

Overall approach

5.5 Our assessment of impact will be informed by:

- Identification of existing, committed and planned public and private investment that might be put at risk
- Assessment of the current vitality and viability of centres on which there might be an impact, in order to assess their vulnerability
- A quantitative assessment of likely trade diversion.

5.6 These assessments will then be brought together and we will reach a view as to whether a 'significant adverse impact' is likely on a centre or centres.

Identification of existing, committed and planned public and private investment

5.7 We will identify investments from a range of desktop sources. We will, if possible, send our list to GVA in order to that they can advise if they are aware of any omissions. We will identify investments in:

- Tiverton
- Exeter
- Exmouth
- Taunton

5.0 Impact

- Cullompton
- Bridgwater
- Crediton
- Torquay

Assessment of vitality and viability

5.8 We will assess the vitality and viability of nearby centres, with our assessment based on the approach set out in Appendix F. We will assess the vitality and viability of:

- Tiverton
- Exeter
- Exmouth
- Taunton
- Cullompton
- Bridgwater
- Crediton
- Torquay

Quantitative assessment of trade diversion

5.9 Separately for convenience and comparison goods, and then together as a composite exercise, we will assess likely trade diversion from existing centres and out of centre retail destinations. Our assessment will be based on the existing trading levels revealed by our household survey and calculated in our assessment of need.

ADVICE REQUIRED FROM GVA

5.10 We would be grateful for advice from GVA on whether they are content with our overall approach to the assessment of impact and, in particular, whether they are content with the list of centres we propose to examine.

APPENDICES

Appendix A

CONVENIENCE GOODS

Table A1

Turnover of proposed convenience floorspace in 2024

	Gross floor area (sqm)	of which sales area (%)	Net sales area (sqm)	of which convenience sales area (%)	Net convenience sales area (sqm)	Estimated sales density (£/sqm)	Implied turnover (£m)
Taste of Devon							
Retail floorspace	1,858	90%	1,672	100%	1,672	6,000	10.0
Wine/cider centre	465	50%	233	100%	233	6,000	1.4
TOTAL	2,323		1,905		1,905		11.4

Notes:
1. Gross floor area based on emerging proposals
2. Sales area for retail floorspace and artisan village assumes 10% of gross floorspace will be for storage, circulation and other non-sales uses
3. Sales area for wine/cider centre assumes 50% of gross floorspace will be for consumption of wine and cider on the premises (A4 use)
4. Convenience sales area for retail floorspace and wine/centre assumes that vast majority of sales will be food and drink products
5. Sales density of proposed floorspace estimated and reflects the likelihood that products will be high value but not sold in the same volume as at a foodstore

Appendix B

COMPARISON GOODS

Table B1

Turnover of proposed comparison floorspace in 2024

	Gross floor area (sqm)	of which sales area (%)	Net sales area (sqm)	of which comparison sales area (%)	Net comparison sales area (sqm)	Estimated sales density (£/sqm)	Implied turnover (£m)
Taste of Devon							
Artisan village	2,323	90%	2,091	100%	2,091	2,000	4.2
Activity retail	5,574	90%	5,017	100%	5,017	2,000	10.0
Designer outlet village	16,722	90%	15,050	100%	15,050	3,000	45.1
TOTAL	24,619		22,157		22,157		59.4

Notes:
1. Gross floor area based on emerging proposals
2. Sales area artisan village assumes 10% of gross floorspace will be for storage, circulation and other non-sales uses
3. Sales area for all other floorspace assumes that 15% of gross floorspace will be for storage, circulation and other non-sales uses
4. Sales density of floorspace at artisan village estimated
5. Sales density of activity retail based on mean average sales density for Snow & Rock and Go Outdoors
6. Sales density of designer outlet centre based on estimates by FSP Retail Consultancy - see http://www.slideshare.net/fspretailconsultant/european-outlet-centres (slide 12)

Appendix C

Household survey draft questionnaire

1. At which food store and location do you normally do most of your household's shopping for food and other groceries?
2. When you visit Q1 do you usually do other shopping in any other stores nearby as part of the same trip?
3. Where do you do most of your household's shopping for day-to-day 'top-up' food and grocery items, such as milk, bread, newspapers and tobacco products?
4. Do you ever visit farm shops or farmers markets and, if so, where do you visit most frequently?
5. <If yes to 4> How frequently do you visit a farm shop or farmers market?
6. Other than farm shops and farmers markets, how often do you visit specialist food shops such as butchers, bakers and fishmongers?
7. Where do you do most of your shopping for clothes, footwear and other fashion goods?
8. Where did you last do your shopping for furniture, carpets and other floor coverings?
9. Where did you last do your shopping for household textiles and soft furnishings, including bedding?
10. Where did you last do your shopping for household appliances, such as fridges, washing machines, kettles or hair dryers?
11. Where did you last do your shopping for audio-visual equipment, such as radios, TVs, telephones, photographic goods and computer products?
12. Where did you last do your shopping for hardware, DIY goods, decorating supplies and garden products?
13. Where did you last do your shopping for chemists and medical goods, cosmetics and other beauty products?
14. Where do you do most of your household's shopping for books; jewellery and watches; china, glassware and kitchen utensils and recreational goods?
15. Do you ever visit factory outlet centres or designer outlet centres and, if so, which one do you visit most frequently?
16. <If yes to 13> How frequently do you visit a factory outlet centre or designer outlet centre?
17. If you go to the cinema, where do you normally go?
18. If you go to the theatre, where do you normally go?
19. SEG of chief wage earner
20. How many people are there in your household who are aged..?
21. How many people (men and women) aged 16-64 are there in your household who are <types of employment>..?
22. Age group of respondent
23. Number of cars available to the household

Household survey draft questionnaire

24. Gender of respondent
25. Would you be willing to be re-contacted for future quality control purposes?

Appendix D

SEQUENTIAL ASSESSMENT CRITERIA – ENGLAND

Availability

Legal or ownership problems

- Such as:
  - Multiple ownerships
  - Ransom strips
  - Tenancies
  - Operational requirements of landowners

Pre-conditions to development

- Such as:
  - Allocation in DPD
  - Remedial action by third parties

Ownership

- Such as:
  - Willingness of owner to bring forward the site for development within a reasonable timescale
  - Progress made by the authority on site assembly through compulsory purchase

SEQUENTIAL ASSESSMENT CRITERIA – ENGLAND

Suitability

Policy restrictions

- Such as:
  - Designations and protected areas
  - Existing planning policy
  - Corporate or community strategy policy

Physical problems

- Such as:
  - Access
  - Infrastructure
  - Ground conditions
  - Flood risk
  - Hazardous risks
  - Pollution or contamination

Potential impacts

- Such as effects on:
  - Landscape features
  - Built heritage

Amenity of future users

SEQUENTIAL ASSESSMENT CRITERIA – ENGLAND

Viability

Market factors

- Such as:
  - Adjacent uses
  - Economic return of existing, proposed and alternative uses in terms of land values
  - Attractiveness of the locality
  - Level of potential market demand

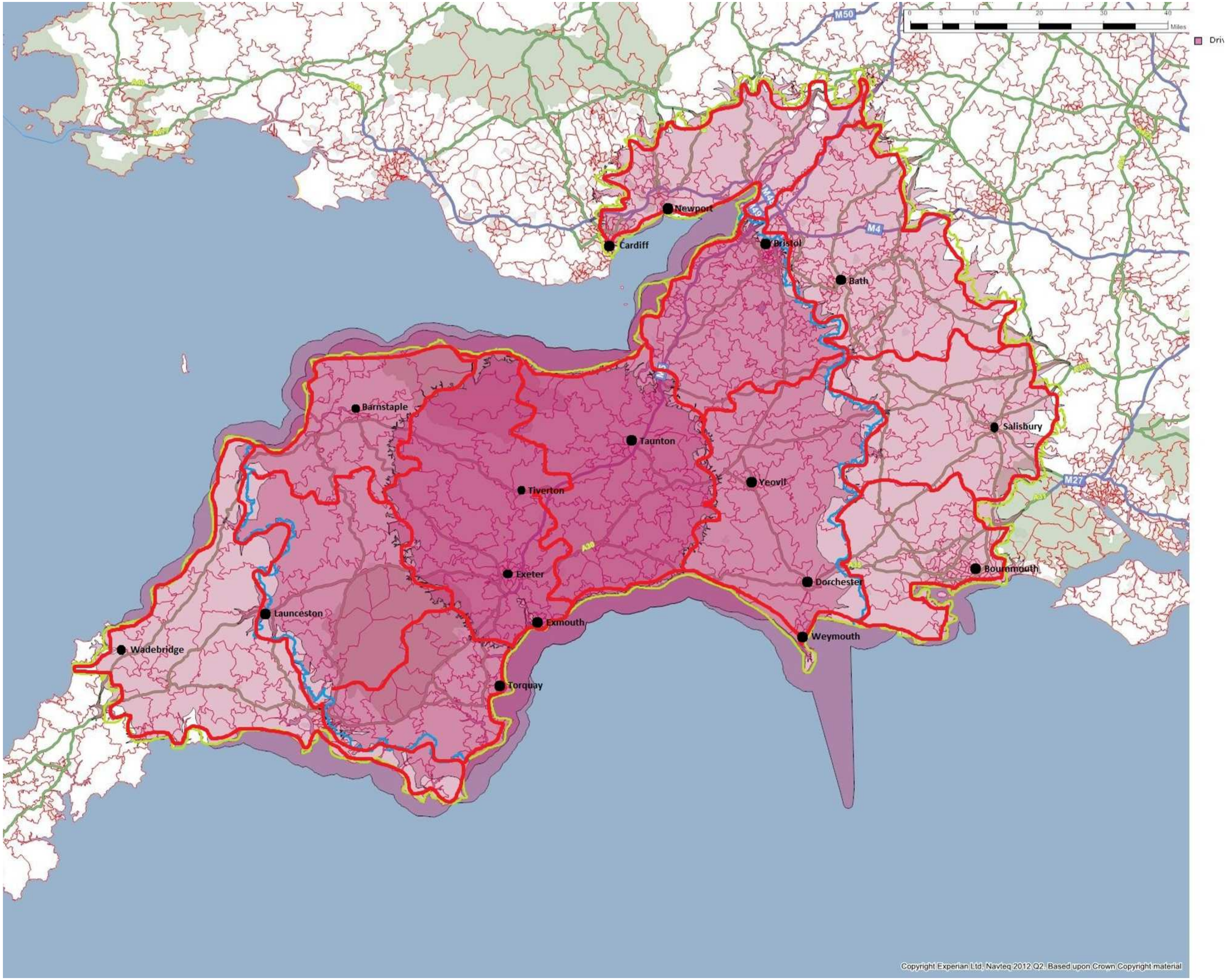
Cost factors

- Such as:
  - Site preparation costs related to any physical constraints
  - Any exceptional works
  - Planning policies or obligations bearing on the site
  - Prospect of funding or investment to address identified constraints or assist development

Delivery factors

- Such as:
  - Developer's own phasing
  - Realistic build-out rates on larger sites (including likely earliest and latest start and completion dates)
  - S106/CIL costs
  - Whether there is a single developer or several developers and their size and capacity

Appendix E


Miles
0
5
10
20
30
40
M50
M4
M49
M27
A30
Driv
Newport
Cardiff
Bristol
Bath
Barnstaple
Taunton
Salisbury
Tiverton
Yeovil
Exeter
Bournemouth
Dorchester
Launceston
Exmouth
Weymouth
Wadebridge
Torquay

Appendix F

ASSESSMENT OF TOWN CENTRE HEALTH – ENGLAND

Indicators of possible vulnerability (1)

Reliance on key uses/facilities

- Is the vitality and viability of the centre reliant on particular uses or facilities, such as an anchor store or community facility?
- If so, is that use or facility at risk?

- Some uses are key to attracting people to a centre and, in some cases, linked trips to shops and facilities elsewhere in the centre may arise, aiding vitality and viability
- Information sourced from household survey, where available, and visit to centre

Current retailer representation

- Is there a strong and wide ranging retail offer (taking into account centre's role in retail hierarchy)?
- Is there evidence of a 'down market' retail offer?

- Vulnerable centres generally include:
  - A low number of national multiples (although some centres can in fact be vital and viable because of a strong independent offer); and
  - High numbers of charity shops, which typically take space where rents are low
- Information sourced from GOAD and visit to centre

Future retailer representation

- Is there evidence of retailers seeking to reduce or close their representation in the centre?

- Retailers will often close stores in declining centres
- Note that on occasion a retailer will close all stores in its portfolio, and this does not indicate a lack of confidence in particular centres
- Information sourced from local and trade press

ASSESSMENT OF TOWN CENTRE HEALTH – ENGLAND

Indicators of possible vulnerability (2)

Retail rents

- Is there evidence of low rents relative to centres of a similar type and size?

- A centre which achieves relatively low rents in comparison to similar centres in the region may be vulnerable, as it suggests low demand for space
- Data sourced from FOCUS and/or local agents

Vacancies

- Is there a high level of long-term vacancies?
- If so, is there likely to be interest from retailers in taking up the space, now or in the future?

- Long-term vacancies suggest a lack of retailer confidence and/or that available space is unsuitable or unaffordable
- Information on retailer requirements can indicate which of these apply
- Information sourced from GOAD, FOCUS and visit to centre

Yields

- Are yields high?
- Have they increased in recent years?

- High yields, i.e. a wide gap between the capital value and the expected market value, suggest a lack of investor confidence and, therefore, a vulnerability
- Data sourced from FOCUS

ASSESSMENT OF TOWN CENTRE HEALTH – ENGLAND

Indicators of possible vulnerability (3)

Development sites

- Are there development sites in the centre that have remained undeveloped for a significant period of time?

- Development sites which remain undeveloped for a significant period suggest a lack of investor confidence
- Information sourced from planning policy documents and visit to centre

Accessibility

- Is it difficult to get to the centre by car and/or by public transport?
- Is it difficult to park?
- Is it difficult to access the centre on foot and/or by cycle?

- Centres which are difficult to get to or in which it is difficult to park may be particularly vulnerable where new development is proposed that is easy to get to and/or easy to park
- Information sourced from visit to centre and online route planners, bus timetables, etc

Footfall

- Is footfall low, in all or part(s) of the centre?

- Footfall provides vitality and drives the viability of the retail offer
- Low footfall implies that the retail offer may be vulnerable
- Information sourced from visits to centre (NB footfall likely to be vary by day of week and time of day)

ASSESSMENT OF TOWN CENTRE HEALTH – ENGLAND

Indicators of possible vulnerability (4)

Customer views

- Is there evidence of shopper dissatisfaction with the centre?

- Dissatisfaction may suggest a vulnerability if shoppers are driven elsewhere
- Information, where available, sourced from household surveys, council publications, chamber of commerce publications, traders association publications and local press

Safety and crime

- Is the centre perceived to be unsafe to the extent that it discourages people from visiting?

- A centre may be vulnerable if significant numbers of people are discouraged from visiting
- Information, where available, sourced from household surveys, council publications, chamber of commerce publications, traders association publications, police publications and local press

Environmental quality

- Is environmental quality poor and, if so, what is the likelihood of improvements being made?

- Existing stores in a poor state of repair suggest a reluctance to invest in improvements and, therefore, that a centre may be vulnerable
- Information sourced from visit to centre