Proposed Retail Development Bankwood Way, Birstall

Planning and Retail Statement

Lidl GB Ltd

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1.0 Introduction

Scope of Report

1.1 This report has been prepared by Lichfields on behalf of Lidl GB Ltd ("Lidl"). It accompanies a full planning application for the redevelopment of land off Bankwood Way, Birstall for a Lidl foodstore and Home Bargains store.

1.2 The description of development is as follows:

"Erection of retail development, with associated parking, servicing areas and landscaping"

1.3 This statement describes the proposals in detail and considers the proposed development against the relevant national and local planning policy, including the retail policy tests of the sequential approach and impact assessment. It should be read alongside the following documents, also prepared to accompany the application:

- a Design and Access Statement, prepared by Lichfields;
- a Community Consultation Statement, prepared by Lichfields;
- a Health Impact Assessment, prepared by Lichfields;
- a Transport Assessment and Travel Plan, prepared by Bryan G Hall;
- a Flood Risk Assessment and Detailed Drainage Strategy, prepared by Beam Consulting;
- a Noise Assessment, prepared by Environmental Noise Solutions Ltd;
- an Air Quality Impact Assessment, prepared by Wardell Armstrong;
- a combined Phase 1 and Phase 2 Ground Investigation Report and Coal Mining Risk Assessment, prepared by Curtins;
- an Ecological Impact Assessment and Biodiversity Net Gain Technical Note, prepared by Tyler Grange;
- an Arboricultural Assessment, prepared by AWA; and
- Lighting Specifications prepared by Signify.

Structure of Report

1.4 The report structure is as follows:

- Section 2.0 describes the application site and surrounding area;
- Section 3.0 describes the proposed development, as well as relevant planning history;
- Section 4.0 summarises relevant national and local planning policy;
- Section 5.0 describes the local retail context, and summarises existing centres and other existing provision within the area;
- Section 6.0 considers the application proposals in the context of the sequential approach to site selection;
- Section 7.0 addresses the potential retail impact of the proposed development;
- Section 8.0 considers the conformity of the proposals with the adopted development plan;
- Section 9.0 assesses the proposed development against the three pillars of sustainable development set out in national planning policy; and
- Section 10.0 provides a summary of the conclusions drawn.

2.0 Site Context

Site and Surroundings

2.1 The site extends to approximately 1.53 hectares and is located adjacent to 'Birstall Shopping Park' an established retail and leisure destination. The site is bounded:

- To the north by Bankwood Way with fast food restaurants and a cinema beyond;
- To the east by Bankwood Way with open grassland beyond;
- To the south by Bankwood Way with open grassland beyond; and
- To the west by office buildings and Woodhead Road with restaurants beyond.

Figure 2.1 Site Location

Source: Lichfields

2.2 The site comprises brownfield land, which previously accommodated a number of office buildings which, after prolonged marketing, failed to attract occupiers. The buildings have subsequently been demolished and the site cleared. Adjacent to the north east boundary of the site there is an existing office building ("Paradigm House") which is occupied and remains unaffected by the development proposals.

2.3 The site benefits from an existing vehicular access point from Bankwood Way to the north. The site slopes at a gentle gradient down from Woodhead Road / Bankwood Way to the north and a number of trees are located along its boundaries. The trees located within and adjacent to the site are not protected by Tree Preservation Orders (TPOs).

2.4 The Government's Flood Map for Planning confirms that the application site is wholly situated in Flood Zone 1 (areas with the least likelihood of flooding). The application site is not located within a conservation area. The closest listed buildings are Wyre Hall (Grade II Listed) and 145-

147 Wakefield Road (Grade II Listed) which are located beyond the M62 to the northwest and northeast respectfully and are therefore not within the setting of the proposal site.

2.5 The site falls predominantly within the "middle" zone of a COMAH (Control of Major Accident Hazards) hazardous installation, with the eastern most part of the site falling within the "outer" zone. It is understood that the hazardous installation is the Tennants Distribution site, which is a low-tier COMAH site and is located some 350m south-west of the proposal site. The implication of this is discussed later in this statement and within the separate Health Impact Assessment.

2.6 The site is located on the edge of Birstall Shopping Park, an established out of centre retail and leisure destination which accommodates a range of major retailers, restaurants and leisure uses. It is a regional shopping and leisure destination, bringing additional consumer spending and investment into Kirklees.

Accessibility

2.7 The site benefits from excellent accessibility. Bankwood Way is accessed via Gelderd Road (A62) to the north which provides vehicular access to the M621 Gildersome Interchange at Junction 27 of the M62 Motorway within 1km of the site. The M621 is a short section of motorway that provides access between central Leeds and the M1 and M62 Motorways. The M62 travels east to Hull and west to Manchester and Liverpool. Gelderd road (A62) also provides access to Holbeck and the Leeds Inner Ring Road to the north and Birstall to the south before continuing to Huddersfield.

2.8 Public transport services operate on Gelderd Road less than 200m from the site providing access to a wide area. Services run to Leeds City Centre approximately every 15 minutes and Dewsbury, Heckmondwike and Huddersfield Town Centre every 30 minutes. The site is approximately 1.5km from residential areas to the south and west via a network of pedestrian footways.

Planning History

2.9 The site benefits from an extant planning permission for retail development.

2.10 Outline permission was granted on the 9th January 2020 at the site for four retail units with associated access, parking and landscaping (planning ref: 2018/92563). Condition 5 attached to the outline permission restricts the gross floorspace of the development to a maximum of 7,896 sqm. Condition 6 states that this gross floorspace should be provided in four separate units (with one unit of up to 2,322 sqm, and three separate units of up to 1,858 sqm each). Condition 7 adds that the sale of convenience goods shall not exceed 30% of the gross floorspace (i.e. 2,368 sqm).

2.11 The extant outline permission established that retail development on this site, is an employment generating use as set out in the committee report:

"As the proposed retail development is an employment generating use as defined in the Local Plan then it is appropriate in a priority employment area and is in accordance with policy LP8."

2.12 The committee report established that the extant outline permission satisfied the retail impact assessment, concluding that:

"it is not considered that the magnitude of the trade diversion impact arising from the application proposal at each of the centres would be such that it could reasonably be deemed 'significant adverse', even when considered in the context of cumulative impacts arising from commitments"

2.13 It then goes onto confirm that:

"The scheme has also satisfied the retail sequential tests and impact assessment, so no policy objection is raised to the use or the scale of the retail floor space proposed."

2.14 Relevant precedents set by this extant planning permission, including the principle of retail development at the site and the application of the sequential and impact assessments, are discussed in Section 8.0 of this Statement.

2.15 The permission also demonstrates that the nearby COMAH site is not a constraint on development, with officers concluding that the benefits of the retail development outweigh the low safety risk posed in the middle and outer zones. The committee report set out that:

"Acknowledging the HSE advice, it is considered that the benefits that this scheme generates within this designated Priority Employment Area are considerable and, on balance, the recommendation is to approve the application."

2.16 Following the recommendation for approval, officers wrote to the Health and Safety Executive ("HSE") to provide them with the opportunity to request that the Secretary of State call-in the application for his own determination. The HSE chose not to exercise this option.

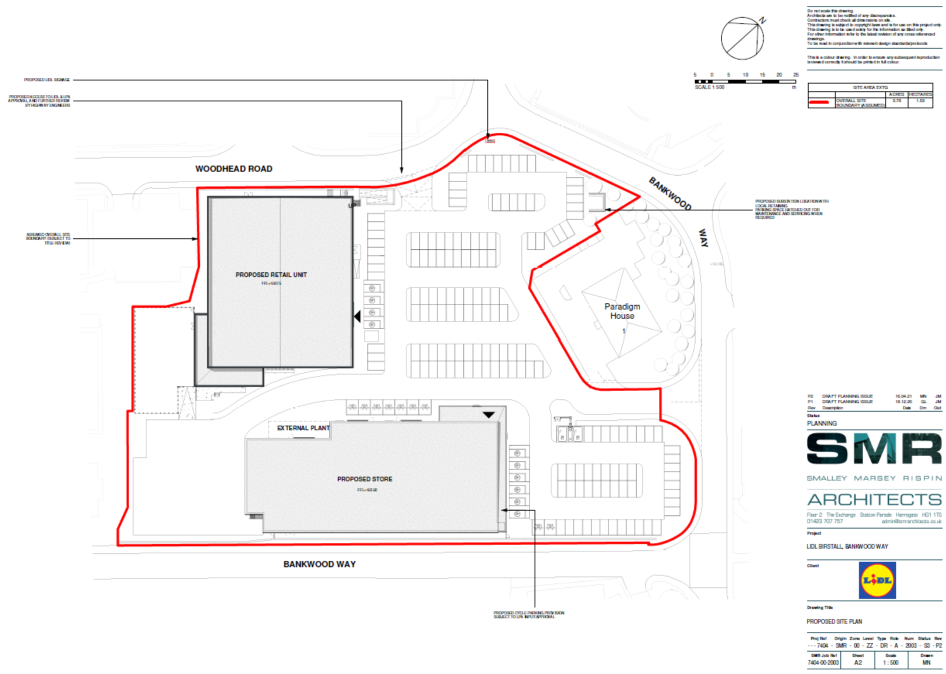
3.0 The Proposed Development

3.1 The proposed development includes the following:

- A new 2,231 sqm gross internal area (1,414 sqm net sales area) Lidl store built to the latest specifications;
- A separate Home Bargains store of circa 2,280 sqm gross internal area (2,014 sqm net sales area) with associated garden centre;
- A joint servicing area to the rear of the stores;
- 175 car parking spaces including 10 accessible spaces, 2 electric vehicle charging spaces, and 9 parent and child spaces;
- A co-ordinated scheme of landscaping around the site including a ramped footpath link from Woodhead Road; and
- Vehicular access from Bankwood Way and Woodhead Road.

3.2 In terms of the sales area split between convenience and comparison goods, it is proposed that for the Lidl store, 80% of this net sales area (1,131 sqm) would be used for convenience goods sales and 20% (283 sqm) would be used for comparison goods sales; and for the Home Bargains store, it is proposed that 45% of this net sales area (906 sqm) would be used for convenience goods sales and 55% (1,108 sqm) would be used for comparison goods sales.

Figure 3.1 Proposed Site Plan



Source: SMR Architects

3.3 The new Lidl store would be accommodated within the south-eastern part of the site, adjacent to Bankwood Way. The entrance to the store would be located on the north-western corner of the building, adjacent to the trolley store, and be linked to the accessible and parent and child parking spaces by a dedicated pedestrian route.

3.4 The new Home Bargains store would be accommodated within the western part of the site, adjacent to Woodhead Road. The Home Bargains store's entrance is located on the northern elevation of the building, facing onto the proposed car parking area. The associated garden centre would be to the rear (west) of the store. A shared service yard will be located to the rear of the stores, in the south western corner of the site.

3.5 Vehicular access into the site will be taken via an upgraded access from Bankwood Way adjacent to Paradigm House which would also provide access for service vehicles. In addition, a new vehicular access would be provided from Woodhead Road. The existing pedestrian access from Bankwood Way will be improved and a new ramped pedestrian access will be provided from Woodhead Road. Central pedestrian routes and crossings will provide a coherent route through the site and between both buildings. Cycle parking and rapid electric vehicle charging points will be provided within the site's car park as follows: 6 cycle parking stands will be provided adjacent to the Lidl store to accommodate up to 12 cycles and one rapid 50kW charging point which is capable of charging two cars at once will be provided.

3.6 Areas of landscaping will be provided along the site's north, east and west boundaries. Existing trees will be retained wherever possible.

3.7 The existing substation will be relocated to the north of the site, west of Paradigm House. A parking space (not included within the 175 customer spaces) will be hatched and reserved for maintenance and servicing when required.

Lidl's Retail Operation

3.8 Lidl has been developing stores throughout the UK since 1994 and currently operates over 800 stores nationwide. Lidl offer high quality products at low prices, as a result of the company's cross-European bulk buying power, and its efficient approach to store format, staffing levels and management.

3.9 This proposal forms part of a significant development programme in Kirklees, with a number of new stores proposed which will deliver hundreds of new jobs and millions of pounds of investment in the district.

3.10 There are a number of factors which help to limit the impact of Lidl stores on existing town centre shops. These include:

- the limited number of product lines that their stores carry, with customers tending to visit other shops to meet day-to-day convenience retail needs;
- the fact that Lidl stores do not incorporate specialist butchery or delicatessen counters; and
- the comparison (i.e. non-food) goods offer in their stores, which varies significantly from week to week, and changes on a twice weekly basis, thereby dispersing any possible impact across a range of sectors.

3.11 A typical Lidl store will offer circa 2,000 product lines, compared with a typical range of 20,000+ lines in a superstore operated by one of the main convenience retailers. Subject to seasonal variation, Lidl stores dedicate around 20% of floorspace to the sale of 'comparison' goods (non-food) items, with the remaining floorspace being used for the sale of 'convenience' goods.

3.12 Lidl stores primarily seek to serve the immediate local community in which they are located, both in terms of their shopping function and also in terms of employment. Lidl seek to employ approximately 15 full time and 25 part time staff from their local community, so that they can offer both a friendly and familiar staffing service to customers. They are committed to attracting customers from the local communities in which their stores are located and offer a free phone taxi service in each of its stores to assist those who have mobility difficulties in visiting the store.

Home Bargains

3.13 Home Bargains is one of the UK's fastest growing discount retailers. The business currently has more than 550 stores throughout the UK and plans to expand to over 1,000 stores employing over 40,000 staff. The business' ethos is to 'sell the best branded products at the lowest possible price'.

3.14 Home Bargains' principal range includes health and beauty products, medicines, baby products, household products, toys and games, pet food, home furnishings and ornaments, seasonal products, ancillary food and drink products and a limited clothing range. Products are priced between 10% and 30% cheaper than elsewhere. Approximately, 70% of the retailer's stock is regular lines, while the other 30% changes continually thereby dispersing any possible impact across a range of sectors.

3.15 The above mix of goods form an integral part of Home Bargain's business model with a varied value product offer, including bulky and non-bulky goods, as well as an ancillary food and drink offer. This complete product range is required to attract customers to the store based on a very specific business model. Every product range is therefore essential in providing the appropriate synergy within the retail unit and the required critical mass of products within the store to ensure a commercially viable store and successful operation of the Home Bargains business model.

4.0 Planning Policy Context

The Development Plan

4.1 The current Development Plan for Kirklees comprises the Kirklees Local Plan (2019). The Local Plan sets the development requirements for the District over the plan period from 2013 – 2031, allocates land for development and identifies sites subject to relevant policies.

4.2 The Local Plan Policies Map shows that the site is within a designated Priority Employment Area (PEA) (ref: PEA46). Policy LP8 (Safeguarding Employment Land and Premises) states that proposals for development for employment generating uses in such areas will be supported where there is no conflict with the established employment uses in the area. The Local Plan Glossary states that enterprises which provide jobs, for example, retail, hotel, assembly and leisure are to be considered as employment generating uses.

4.3 Notwithstanding the site being part of an established retail destination, the Policies Map confirms that the site is not located within a designated retail centre. Policy LP 13 states that main town centre uses shall be located within defined centres (principal town centres, town centres, district centres, and local centres), as shown on the Policies and Town Centre Maps, and as detailed in the shopping centre hierarchy and then in accordance with the sequential test. Policy LP 13 also states that an impact assessment will be required for all out of centre retail proposals which would provide a floorspace greater than 500 sqm gross.

4.4 Additionally, the Policies Map indicates that the site falls within a Mineral Safeguarding Area. In accordance with Policy LP38 this application is accompanied by a Site Investigation report and Coal Mining Risk Assessment.

4.5 The Local Plan also contains a number of policies which are relevant to the consideration of this application. These are summarised below and referred to, where relevant, throughout the remainder of the report:

- Policy LP 1: Presumption in Favour of Sustainable Development – The council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- Policy LP 7: Efficient and Effective Use of Land and Buildings - To ensure the best use of land and buildings, proposals should encourage the efficient use of previously developed land in sustainable locations provided that it is not of high environmental value.
- Policy LP 21: Highway and Safety Access - Proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users. New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe.
- Policy LP 22: Parking - Car parking provision in new developments will be determined by the availability of public transport, the accessibility of the site, location of the development, local car ownership levels and the type, mix and use of the development.
- Policy LP 24: Design - Proposals should promote good design by ensuring, inter alia, the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape; that they provide a high standard of amenity for

future and neighbouring occupiers; and that they provide high levels of sustainability, to a degree proportionate to the proposal.

- Policy LP 30: Biodiversity and Geodiversity - Development proposals will be required to result in no significant loss or harm to biodiversity in Kirklees through avoidance, adequate mitigation or, as a last resort, compensatory measures secured through the establishment of a legally binding agreement.
- Policy LP 52: Protection and Improvement of Environmental Quality - Proposals which have the potential to increase pollution from noise, light, odour and other forms of pollution, must be accompanied by evidence to show that the impacts have been evaluated and measures have been incorporated to prevent or reduce the pollution, so as to ensure it does not reduce the quality of life and well-being of people to an unacceptable level or have unacceptable impacts on the environment.

National Planning Policy Framework

4.6 The National Planning Policy Framework (NPPF, February 2019) sets out the Government's economic, environmental and social planning policies for England.

4.7 At the heart of the Framework is a presumption in favour of sustainable development. The revised NPPF confirms that significant weight should be placed on the need to support economic growth and productivity, taking into account both local needs and wider opportunities for development (paragraph 80).

4.8 Paragraph 85 of the NPPF makes clear that planning policies should promote the long-term vitality and viability of centres, by allowing them to grow and diversify, in a way that responds to rapid changes in the retail and leisure industries, allows a suitable mix of uses and reflects their distinctive characters.

4.9 It also emphasises the importance of meeting needs for retail, leisure, office and other main town centre uses over a ten year period, and ensuring that this is not compromised by limited site availability. Where suitable and viable town centre sites are not available for such uses, policies should allocate appropriate edge of centre sites that are well connected to the town centre.

4.10 The Framework states that planning applications for main town centre uses (such as retail) which are not in a defined centre and are not in accordance with an up-to-date development plan should be subject to a sequential test (Paragraph 86). Such uses should be located in town centres, followed by edge-of-centre locations and, only if suitable sites are not available, should out-of-centre sites be considered. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored (paragraph 87).

4.11 The Framework also states that proposals for new retail and leisure uses outside of town centres, which are not in accordance with an up to date plan, should be subject to an impact assessment where the development is over a proportionate, locally set floorspace threshold (or over 2,500 sqm, where there is no such threshold). The impact assessment should consider:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme) (Paragraph 89).

4.12 Paragraph 120 of the revised NPPF states that planning policies and decisions need to reflect changes in the demand for land. It confirms that, where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

- they should, as part of plan updates, re-allocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, de-allocate a site which is undeveloped); and
- in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

Planning Practice Guidance

4.13 Planning Practice Guidance ('PPG') supports the NPPF. It provides guidance on how to ensure the vitality of town centres and advocates a positive approach to meeting needs, making clear that local planning authorities should assess and plan to meet the needs of main town centre uses in full. It notes that:

"It may not be possible to accommodate all forecasted needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests."

4.14 In relation to the sequential approach, the PPG requires local authorities to consider whether the identified need for main town centre uses can be accommodated on town centre sites. This should consider the suitability, availability and viability of sites, with particular regard to the nature of the need that is to be addressed.

4.15 In addition, the PPG states that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements, which mean that they may only be accommodated in specific locations. It also recognises that, as promoting new development in town centre locations can be more expensive and complicated than elsewhere, local planning authorities need to be realistic and flexible in terms of their expectations.

4.16 In relation to application of the impact test, the PPG sets out a number of steps which should be taken. These include establishing the state of existing centres and current shopping patterns, determining the appropriate time frame for assessing impact and considering a range of plausible scenarios. Where wider town centre developments or investments are in progress, the PPG recognises that it will be appropriate to assess the impact of applications on that investment.

Summary

4.17 The site is designated in the Local Plan as a Priority Employment Area and the proposed retail development should therefore be supported, provided it does not conflict with the established employment uses in the area.

4.18 Importantly, the NPPF confirms that significant weight should be placed on the need to support economic growth and seeks to encourage the re-use of previously developed sites. Policy LP 1 also states that the Council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

4.19 The site is not located within a defined retail centre. In accordance with Policy LP 13, the application is required to be accompanied by a sequential assessment, and, as the proposed development comprises retail floorspace in excess of 500sqm, a retail impact assessment. These assessments have been undertaken and are discussed in Sections 6.0 and 7.0.

5.0 Retail Context

Local Retail Hierarchy

5.1 As explained in Section 2.0, the application site at Bankwood Way is located adjacent to Birstall Shopping Park. This contains a large Ikea store, as well as a wide range of other retail and leisure units, and it attracts the most significant quantum of comparison goods (non-food) spending from this area. The proposed new Lidl and Home Bargains stores would therefore form part of a wider retail and leisure destination which, in turn, is conveniently accessible from the M62 motorway.

5.2 In terms of designated centres, Huddersfield Town Centre, which is situated around 14 km to the south-west of the application site, is the largest centre in Kirklees, with the largest quantum of retail and other commercial floorspace and number of units. However, whilst it contains a wide range of comparison retail uses, along with a number of foodstores, service uses, and other leisure and community facilities, it attracts limited spending from the north-eastern part of the Borough, particularly for convenience goods.

5.3 There are a number of other defined town centres in Kirklees, including Batley (which lies within the Primary Catchment Area of the proposed development defined in **Appendix 1**) Cleckheaton, Dewsbury, Holmfirth and Heckmondwike. These town centres all contain a wide range of retail and other commercial/community uses, although their catchment areas are more localised and do not extend across the Borough. There are also a number of designated district centres including, in the eastern part of Kirklees, Birstall, as well as various local centres, which perform a more localised role, meeting only day to day needs.

5.4 Convenience goods (i.e. food) shopping patterns in the north-eastern part of Kirklees are significantly influenced by a number of large and medium-sized foodstores. These include Tesco stores in Batley and Cleckheaton, Morrisons in Heckmondwike, Asda and Sainsbury's in Dewsbury, Lidl facilities in Heckmondwike and Dewsbury and Aldi in Batley. There is also an M&S Simply Food store at Birstall Shopping Park, and Morrisons and Asda stores in Morley, which is just outside of the Borough.

5.5 Centres such as Dewsbury and Batley are popular for comparison goods (non-food) shopping with local residents in north-east Kirklees. However, Birstall Shopping Park, attracts the most significant quantum of comparison goods (non-food) spending from this area. There are a range of other freestanding facilities in the north-eastern part of the Borough, many of which are unrelated to existing centres, although a significant proportion of local spending is also attracted to facilities in the Leeds City Council area (including Leeds City Centre itself).

Review of Existing Centres

5.6 Given the restrictions in place as a result of the Covid-19 pandemic, it has not been possible to visit existing centres in the Primary Catchment Area (described in **Appendix 1**) and undertake a detailed review of their vitality and viability. However, a summary of the role and function of Batley Town Centre and Birstall District Centre is set out below, based on desk-top research and previous survey information provided by the Council.

Batley Town Centre

5.7 Batley Town Centre is located around 3 km to the south of the application site and serves residents of the town itself and the surrounding areas in the north-eastern part of the Borough. The centre is focused upon Commercial Street, Branch Road and Cambridge Street, although the indoor Batley Shopping Centre (to the north of Commercial Street) also contains a number of retailers.

5.8 The table below shows the mix of uses in the centre, based on a survey undertaken by Kirklees Council in 2019. Whilst there is likely to have been some changes since that time, the impact of the restrictions imposed as a result of the recent Covid-19 pandemic mean that it is difficult to establish an accurate indication as to the centre's current composition.

Table 5.1 Mix Uses in Batley Town Centre

Use Type	Number of Uses	Proportion of Uses
Convenience	16	11.8%
Comparison	30	22.1%
Financial & Business Services	9	6.6%
Leisure Services	26	19.1%
Office	4	2.9%
Retail Service	29	21.3%
Vacant Outlets	22	16.2%
Total	**136**	**100.0%**

Source: Kirklees Borough Council

5.9 As set out above, based on the latest survey, there are 16 convenience retail uses in Batley Town Centre (representing 12% of the total number of ground floor uses). These include a Tesco Extra superstore of around 7,100 sqm net floorspace, as well as an Aldi of c. 800 sqm net – which trades at a level significantly the company average based on the Council's most recent retail study - and Asda and Iceland supermarkets in the Batley Shopping Centre (c. 1,000 sqm net and 500 sqm net respectively). There are also a number of other smaller, specialist and generally independent, stores in the centre.

5.10 Around 22% of the uses in the centre are comparison retail operators. Whilst the vast majority of these are independent traders, including florists, pharmacies, jewellers and clothes shops, there are also units occupied by 02, Savers and Card Factory. The majority of uses in the centre are therefore services – which include a selection of banks, hair and beauty salons, cafes/restaurants, bookmakers and hot food takeaways. There is also a market held every Friday in Batley in Market Place, as well as a library, health centre, nursery and two dentists.

5.11 Based on the 2019 survey, 22 units in the centre were vacant, representing 16% of the total, which is above the national average (circa 12%). Although there was also a cluster of empty properties on Commercial Street, a significant number of these units were located on Alfreds Way (within the Batley Shopping Centre). It is understood from press reports that the indoor shopping centre was undergoing refurbishment in 2019 and was due to re-open that year following a re-design. It is therefore likely that the permanent vacancy rate in that part of the centre (after allowing for temporary closures due to Covid-19) is now lower. Furthermore, the majority of vacant units in the wider centre are small in scale, at below 200 sqm gross floorspace.

5.12 Whilst the design of the Batley Shopping Centre (along with some of the other properties along Commercial Street) is more functional, parts of the town centre, including around Market Place/Cambridge Street, are located within a Conservation Area. Batley Bus Station is located to the north-west of the shopping centre and there are also bus stops located along Commercial Street, which help to ensure that the centre is conveniently accessible by public transport. A large car park is provided adjacent to Tesco, with parking also being available by the Aldi foodstore and to the east of the bus station.

5.13 Overall, the centre contains a range of uses which meet the day to day needs of residents of Batley and the immediate surrounding area, including Tesco and Aldi foodstores, both of which are trading well. Whilst the comparison goods retail function of the centre is focused upon smaller and/or independent/specialist traders, with only a limited number of national multiples, there are also a range of service and other commercial uses which help to reinforce its role in the community. Although the unit vacancy rate was relatively high at the time of the Council's latest survey, and will also have been influenced by the current restrictions associated with Covid-19, this is likely to have been reduced following the refurbishment of the Batley Shopping Centre, and is not considered reflective of any particular weakness in the health of the centre.

Birstall District Centre

5.14 Birstall District Centre is located just over 1.5 km to the south-west of the application site at Bankwood Way. Based on the Council's most recent survey, undertaken in September 2020, it contains 66 different commercial and community uses, the majority of which are located along Low Lane/Nelson Street – which runs from east to west through the centre – and Market Street. The centre primarily meets the day to day shopping and service needs of residents of Birstall itself.

Table 5.2 Mix of Uses in Birstall District Centre

Use Type	Number of Uses	Proportion of Uses
Convenience	5	7.6%
Comparison	12	18.2%
Financial & Business Services	6	9.1%
Leisure Services	17	25.8%
Office	1	1.5%
Other	4	6.1%
Retail Service	18	27.3%
Vacant Outlets	3	4.6%
Total	**66**	**100.0%**

Source: Kirklees Council

5.15 As illustrated in the table above, there are just five convenience retail uses in Birstall District Centre (8% of the total). These include Tesco Express and Co-op convenience stores of around 250-300 sqm net respectively, as well as a butcher, bakery and a further independent convenience store, all of which are focused upon specialist and top-up shopping needs.

5.16 There are twelve comparison retail uses (18% of the total), all of which are small, independent traders, including a florist, pharmacy, a card/gift shop and DIY store. The most significant proportion of uses in the centre are services (62% in total), which include various hair/beauty salons, cafes/restaurants, takeaways, dry cleaners/laundrettes and a post office. Other uses include a physiotherapist, dental practice and library.

5.17 Based on the Council's survey in September 2020, there are just three vacant units within the centre, all of which provide less than 100 sqm gross floorspace, representing a vacancy rate of less than 5% (less than half the national average). Whilst the latest restrictions in relation to the pandemic may have impacted upon the number of uses which are currently open in the centre, this nevertheless indicates that the centre is performing well in its role in meeting the day to day needs of local residents.

5.18 All of the defined centre is located within a conservation area and various stone-built properties help to provide an attractive setting for Low Lane/Market Place. There are bus stops located at various points throughout the centre, which is also conveniently accessible on foot from the surrounding residential areas. Although the centre has limited significance beyond its immediate surrounding catchment in Birstall, and the vast majority of existing facilities in the centre are all small in scale, it is performing well in its role of meeting the day to day needs of local residents.

Other Existing Centres

5.19 As explained earlier in this section, Huddersfield Town Centre is the Principal Centre in Kirklees, although it is a significant distance from the application site and only draws limited trade from the north-east of the Borough for both convenience and comparison goods shopping. In addition to Batley, other defined town centres in Kirklees include Cleckheaton, Dewsbury and Heckmondwike. However, whilst they all contain a wide range of retail and other commercial/community uses, their catchment areas are relatively localised.

5.20 There are a number of defined local centres located either within or immediately beyond the defined Primary Catchment Area, including those at Gomersal, Birkenshaw and in the suburbs of Batley, Cleckheaton and Heckmondwike. However, these centres meet only the basic, day to day needs of local residents in their immediate, local catchment areas, with existing provision there being small in scale.

5.21 There are a range of large and medium-sized foodstores located across the area – including Aldi and Tesco Extra in Batley, and Lidl and Morrisons on Cleckheaton. Furthermore, comparison shopping patterns in the area are significantly influenced by Birstall Shopping Park, which lies adjacent to the application site. This is anchored by an Ikea furniture store and contains a wide range of other non-food retail uses, within the bulky and non-bulky sectors, as well as an M&S Foodhall. Based on the Council's latest retail study, a significant proportion of spending from the north-east part of Kirklees also flows to facilities in the Leeds City Council, which include Leeds City Centre.

Committed and Proposed Developments

5.22 As explained in Section 2.0, outline planning permission was granted on 9th January 2020 for the development of four retail units, with associated access, parking and landscaping on the application site (planning ref: 2018/92563). This permission has established the principle of retail development on the site.

5.23 Condition no. 5 attached to the outline permission restricts the gross floorspace of the development to a maximum of 7,896 sqm, with Condition no. 6 requiring that this floorspace be provided in four separate units (with one unit of up to 2,322 sqm, and three separate units of up to 1,858 sqm each). Condition no. 7 states that the sale of convenience goods shall not exceed 30% of the gross floorspace (i.e. 2,368 sqm).

5.24 Discussions with Council Officers have established that there have been a number of other recent planning applications made for new retail development in the defined Study Area. These include the following:

- permission granted in April 2018 for new retail floorspace, including a B&M store of 2,323 sqm gross (with garden centre), on the Blakeridge Mills site, at Mayman Lane in Batley (ref. 2017/93925);

- an application for on the Kenmore Caravans site, Mirfield, for a new discount foodstore of 1,837 sqm gross/1,254 sqm net floorspace, which was approved in December 2020 (ref. 2019/92221);
- an application for the development of a new Aldi foodstore of 1,785 sqm gross/1,315 sqm net floorspace, on the Cleckheaton Mills site, Bradford Road, Cleckheaton, which was submitted in June 2020 but is yet to be determined (ref. 2020/91821); and
- an application at Rishworth Retail Park, at Dewsbury, for the extension of an existing unit to form a new foodstore to be operated by Aldi, which was submitted in July 2020, and is also yet to be determined (ref. 2020/92384).

5.25 Whist the third and fourth of these proposals have not been approved and are therefore not 'commitments' in planning terms, the first two schemes have been factored-in to the quantitative impact summarised in Section 7.0.

Kirklees Retail Capacity Study Update (2016)

5.26 The Kirklees Retail Capacity Study Update (2016) was prepared by WYG on behalf of Kirklees Council. It provided an update of the 2014 study, in respect of the future need for new retail floorspace, using the same (2013) household shopping surveys undertaken as part of the 2014 work, although with more recent base data and forecasts in respect of population and expenditure (which take into account planned housing growth).

5.27 The study indicated that, cumulatively, convenience goods floorspace across Kirklees was effectively 'over-trading' (i.e. trading at levels above company average or anticipated benchmark levels) by £134.8m at 2016. Although the performance of existing foodstores across the Borough varies across the different zones, both the existing Aldi in Batley and Morrisons in Heckmondwike were estimated to be trading significantly above their respective company averages.

5.28 After allowing for existing commitments, it was forecast that there would be expenditure capacity to support new convenience goods retail floorspace in Kirklees in the order of £66.7m in 2021, increasing to £87.8m in 2026 and £108.4m in 2031. Whilst the study did not identify any expenditure capacity for Zone 9 in particular (which includes the application site), the assessment did not take into account the extent to which new floorspace in this zone could claw-back spending which is currently 'leaking-out' of the area to facilities further afield.

5.29 In relation to comparison goods retailing, after factoring-in commitments, the study forecast that there would be expenditure capacity to support new retail floorspace in Kirklees of approximately £30.0m in 2021, increasing to £166.6m in 2026 and £342.1m in 2031 (or £14.9m, £51.5m and £98.4m respectively for Zone 9 in particular).

5.30 These figures should be treated with caution, not least given they are based on surveys undertaken in 2013, and the existence of more recent expenditure data forecasts (including those which take into account the impact upon spending over the last year so resulting from the current pandemic). Notwithstanding this, however, it is clear that there is likely to be scope to accommodate new comparison goods retail floorspace, in part, from growth in spending in the medium to long term, without having a significant impact upon existing centres. As discussed in Appendix 1 of this statement, the use of this survey has been discussed with the Council and their retail policy advisors and agreed as, in this particular case, to represent an appropriate basis to form the starting point for an assessment of the trading impacts of the proposed development.

Summary

5.31 Birstall District Centre is currently performing well, with just three vacant units at the time of the Council's last survey. However, the centre performs a localised role and function, with existing convenience retail provision there meeting top-up/specialist needs, and comparison retailing comprising smaller, independent operators. Although Batley Town Centre contains existing Tesco and Aldi facilities, which both trade well, as well as a wider range of other retail and service uses, the vast majority of existing provision there again serves day to day needs.

5.32 Convenience retail shopping patterns are influenced by a number of other existing foodstores in the wider area. These include Morrisons and Lidl in Heckmondwike, Asda, Sainsbury's and Lidl in Dewsbury, as well as Morrisons and Asda stores in Morley (just outside of the Borough). A significant proportion of comparison goods retail spend also flows to the out-of-centre Birstall Shopping Park - which is anchored by Ikea, but also includes a range of other retail and leisure facilities, including an M&S Simply Food store - as well as stores and centres outside of the Borough, including in Leeds.

5.33 Whilst now somewhat dated in the context of more recent expenditure data, as well as any changes in shopping patterns, the Council's most recent retail study identified expenditure capacity to support significant new convenience and comparison goods retail floorspace. It also confirmed that the existing Aldi in Batley and Morrisons in Heckmondwike were trading significantly above their respective company averages. The levels of capacity previously identified are reflected in the planning permission previously granted by Kirklees Council for a significant quantum of new retail floorspace on the application site.

6.0 Sequential Site Assessment

Policy Context

6.1 The NPPF requires that a sequential approach to site selection be applied to proposals for new main town centre uses (such as retail) which are not within an existing centre or allocated in an up-to-date development plan. Such uses should be located in town centres, followed by edge-of-centre locations and, only if suitable sites are not available (or expected to become available within a reasonable period), should out-of-centre sites be considered (with preference again given to accessible sites well connected to the town centre).

6.2 As explained in Section 2.0, planning permission was granted in January 2020 for the development of four retail units, comprising up to 7,896 sqm gross floorspace, with access, parking and landscaping, on the application site. This permission established the principle of retail development on the site and, in doing so, that these previous proposals were acceptable in the context of the sequential approach. Notwithstanding this, however, as a new application is now being submitted, and given the passage of time, as requested by Council Officers, an assessment has been made of these new proposals in relation to the sequential test.

6.3 Annex 2 of the NPPF indicates that, for retail purposes, the term ‘edge-of-centre’ applies to a location that is both well connected to, and within 300m of, the Primary Shopping Area (PSA). Notwithstanding its location within an established retail and leisure destination, the application site lies around 1.75 km walking distance from the defined boundary of Birstall District Centre. It therefore occupies an out-of-centre location in the context of national planning policy. On this basis, taking into account the requirements of the both the NPPF and Policy LP13 of the adopted Local Plan, it is necessary to consider the suitability and availability of potential alternative sites located both within and on the edge of existing centres to accommodate the proposed development.

6.4 Given the extent of the defined Primary Catchment Area, this section includes an assessment of sites within/on the edge of Batley Town Centre and Birstall District Centre. Whilst there are also a small number of local centres within the PCA, they perform a localised role and function and, as such, new retail development there would not be able to serve the same catchment as the proposed Lidl and Home Bargains stores on the application site. However, whilst located outwith both the PCA and Kirklees Borough, given its proximity to the site, the assessment also considers sites in relation to Morley Town Centre, in Leeds.

6.5 The NPPF states that applicants and local authorities should demonstrate flexibility on issues such as format and scale. In this context, where alternative sites are to be considered, their suitability should be assessed in terms of their physical capability to accommodate the form of development proposed in the application, having demonstrated flexibility. This approach is consistent with recent High Court decisions.

6.6 The most recent revisions to the NPPF provided an opportunity to clarify the Government’s position on disaggregation when applying the sequential test, however, it stays silent on such matters and, therefore, consistent with recent High Court judgements and the Rushden Lakes Secretary of State decision, only reiterates the need for flexibility in terms of scale and format.

6.7 A recent (October 2018) Inspector and Secretary of State call-in decision at Cribbs Causeway also deals with disaggregation. The Inspector (at paragraph 567 to 568) confirmed that, whilst disaggregation was adopted in past policy, this was not embodied in either the Framework or the Planning Practice Guidance. Although the Inspector also referred to other appeal decisions in Hull and at Tollgate Village that adopted disaggregation, she concluded that the findings there were case specific and not specifically endorsed by the Secretary of State. The Inspector went on to conclude at Cribbs Causeway that:

"….as a general principle, an approach that involves disaggregation does not seem to fit well with the Aldergate Properties or Warners Retail judgments."

6.8 In the context of the above, in applying the sequential test, it is necessary to consider whether there are any suitable and available sites which can accommodate a development which his broadly similar to the application proposals – and not whether it could be disaggregated such that it could be accommodated on several different sites. The assessment below is undertaken on this basis, having regard to a desk-based review of potential alternative sites, supplemented through discussions with Council Officers.

Assessment of Potential Alternative Sites

6.9 As explained in the Methodology (**Appendix 1**), it was agreed with the Council/their retail advisors that this assessment would focus upon sites within/on the edge of Batley Town Centre and Birstall District Centre. In addition, and whilst located outwith both the PCA and Kirklees Borough, given its proximity to the site, the assessment also considers sites in relation to Morley Town Centre, in Leeds. In order to give due consideration to the requirement to demonstrate flexibility, a minimum site size hasn't been applied, however, the ability of each site to accommodate new development (even when flexibility is applied) has been assessed on a case by case basis.

Batley Town Centre

Former Batley Working Men's Club, Wellington Street

6.10 The site lies on the edge of Batley Town Centre, to the south-east of Wellington Street, approximately 50 metres walking distance to the south west of the Primary Shopping Area (PSA). It was formerly occupied by Batley Working Men's Club but has since been cleared and currently comprises vacant, brownfield land.

Figure 6.1 Former Batley Working Men's Club Site

Source: Google Earth Pro (2021)

6.11 The site is located within the Batley Station Road Conservation Area. In addition, the site is small in scale, at around 0.2 ha, and constrained by surrounding roads, Council-run public car parking, and the Wellington public house. On this basis, and particularly given its size (which is less than 15% of that of the application site), it would clearly not be suitable for the new development proposed on the Bankwood Way site.

Blakeridge Mill, Mayman Lane

6.12 The site was formerly associated with Blakeridge and Jubilee Mills. The site is located within the Cross Bank Conservation Area and there are also a number of listed buildings within the vicinity. It is accessed from Mayman Lane (B6123), to its eastern side, and former mill buildings on an adjacent site have been converted to accommodate residential apartments.

Figure 6.2 Blakeridge Mills Site

Source: Google Earth Pro (2021)

6.13 The site is located around 350 metres walking distance from (and to the west of) Batley Town Centre boundary and around 450m from the PSA. As such, taking into account the NPPF, the site is out-of-centre in policy terms, and not sequentially preferable to the application site at Bankwood Way.

6.14 In addition, planning permission was granted in April 2018 for new retail floorspace on the site, to include a B&M store of 2,323 sqm gross (with garden centre) (ref. 2017/93925). This store has now been built out and opened, along with a number of smaller units on the wider site. As such, and notwithstanding the fact that the site is not sequentially preferable, the site is clearly not available for the development proposed in the subject application.

Victoria Works, 444-446 Bradford Road, Batley

6.15 The site is presently occupied by vacant former industrial buildings (comprising Victoria Works) on the northern side of the A652 Bradford Road, to the west of its junction with Caledonia Road. The site lies immediately to the north of the Primary Shopping Area and Town Centre Boundary, from which it is separated by Bradford Road (A652), although it lies around 100m walking distance from the Primary Shopping Frontages (being located to the rear of Tesco) and is edge of centre in policy terms.

Figure 6.3 Victoria Works Site

Source: Google Earth Pro (2021)

6.16 The site is not allocated for any specific use within the Kirklees Local Plan. However, Flood Zones 2 and 3 marginally encroach into the southern part of the site, and there is also a significant difference in levels, with the rear (northern part) being considerably higher than the Bradford Road frontage.

6.17 Outline planning permission was granted for new residential development comprising 40 units, with 54 parking spaces, in December 2017 (ref. 2016/93147). It therefore appears likely that the site will come forward for alternative uses and is unlikely to be available for new retail development.

6.18 In addition, the site, at around 0.4 ha (c. 25% of the application site), is clearly too small to accommodate the proposed development, even accounting for flexibility, and it is also unclear as to whether it would be possible to achieve a suitable access point for servicing vehicles, particularly given the surrounding narrow roads and other commercial properties. In this context, the site is also not uitable for the proposed development.

Birstall District Centre

6.19 Based on a desk-top research undertaken in February and March 2021, no potential alternative sites of any significance have been identified either within or on the edge of Birstall Town Centre.

Morley Town Centre

Land at Rod Mills Lane

6.20 The site comprises land and buildings to either side of Rod Mills Lane, in Morley. It is bounded to the east and west by existing commercial premises off Wide Lane and High Street, with

Fountain Street to the north and more commercial/industrial buildings and Magpie Lane being to the south.

6.21 The is located immediately adjacent to the designated town centre boundary for Morley and around 150 m walking distance from the PSA. However, whilst it could be considered edge of centre, in practice, it has limited visual relationship with the town centre, particularly given that a significant proportion of the site is set back from Fountain Street.

Figure 6.4 Land at Rod Mills Lane

Source: Google Earth Pro (2021)

6.22 The site is located within a Conservation Area and allocated within the Leeds Site Allocations Plan (SAP) for housing (under Allocation HG2-156) with an indicative capacity of 15 dwellings. As such, any new retail development here would be contrary to the adopted development plan for the area. In addition, there are two no. Grade II listed buildings within the site which, along with a large number of mature trees would also significantly constrain the form of development which could be achieved on the site.

6.23 The existing vehicular access into this site from Fountain Street is constrained, the site is irregular in shape, and the limited frontage to this street would also impact upon its attractiveness in commercial terms. On this basis, and taking into account all of the above, the site is clearly not suitable for retail development of the scale proposed at Bankwood Way.

Scatcherd Works, Scatcherd Lane

6.24 The site is to the south of Scatcherd Lane (to the rear of residential properties along that road) and comprises redundant light-industrial units. It is located around 190 metres walking distance from Morley Town Centre, although approximately 350 metres from the PSA, at its closest point. On this basis, and given that there are no visual linkages between the site and the

PSA, it is considered out-of-centre in policy terms, and not sequentially preferable to the application site at Bankwood Way.

Figure 6.5 Scatcherd Works Site

Source: Google Earth Pro (2021)

6.25 Planning permission was granted in November 2020 for the demolition of the industrial units on the site and construction of nine dwellings (ref. 19/07611/FU). On this basis, the site would appear likely to come forward for residential development and is not considered available for the proposed retail development.

6.26 In addition to the above, the site is just 0.5 ha in size (around a third of the application site), and is therefore too small to accommodate the development. Furthermore, the vehicular access from Scatcherd Lane is currently narrow, running adjacent to existing residential properties, and unlikely to be suitable for service vehicles. For these reasons, and given that the site otherwise has no frontage to Scatcherd Lane itself (meaning that it is unlikely to be attractive to retail operators), it is also not suitable for the proposed development.

Vacant Units

6.27 Consideration has also been given to the potential of currently vacant units within each of the above centres to accommodate the proposed development, based on a review of commercial agents' websites in February and March 2021. This review has identified that those units which are being marketed as available in these centres are all small scale (i.e. circa 100 sqm or below), with limited scope for amalgamation, and clearly not of sufficient size to accommodate the new retail floorspace proposed at Bankwood Way.

6.28 Therefore, there are no currently available units in relation to these centres which are suitable to accommodate the proposed units – even before consideration is given to the need for directly accessible surface car parking and servicing provision.

Summary

6.29 Consideration has been given to potential alternative opportunities within and on the edge of Birstall, Batley and Morley Town Centres, in terms of their potential to accommodate the proposed development. None of the sites identified are suitable and available to accommodate the proposed development due to a range of constraints, including size/shape, location, existing and proposed uses, and policy considerations. In addition, some of the sites considered are not sequentially preferable to the application site at Bankwood Way.

6.30 As such, there are no sequentially preferable alternative sites which could accommodate the proposed development, and the subject application is therefore considered to be compliant with the sequential approach to site selection set out in the NPPF. This also reflects the conclusions reached by the Council when approving the previous application for new retail development on the subject site.

7.0 Impact

7.1 The NPPF requires that proposals for new retail uses in excess of 2,500 sqm, which are not located within an existing centre, and not in accordance with an up to date development plan, should include an assessment of:

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

7.2 The proposed new Lidl and Home Bargains stores would, individually, each comprise less than 2,500 sqm gross. Furthermore, planning permission has already recently been granted for significant new retail development on the site (see below) where the retail impact has been deemed to be acceptable. However, Local Plan Policy LP13 requires impact assessments to be carried out in respect of all retail proposals over 500 sqm gross. On this basis, given that the application proposes c. 4,500 sqm gross floorspace in total, and taking into account discussions with Officers, an assessment of the subject application proposals against the above issues is set out further below.

Comparison with Approved Scheme

7.3 Ahead of considering the likely impact of the scheme proposed on the current application at Bankwood Way, it is important to note that Kirklees Council has already granted planning permission for new retail development on the site of a much larger scale. In this context, the table below provides a comparison of the floorspace and forecast turnover of both the currently proposed scheme and that previously approved. This takes into account the forecast turnover of the proposed new Lidl and Home Bargains stores, as set out in Table 8 at Appendices 3 and 4, as well as information contained within the assessment prepared to accompany the approved scheme.

Table 7.1 Comparison Between Proposed and Approved Schemes

	Proposed Scheme			Approved Scheme			Difference		
	Convenience Goods	Comparison Goods	Combined	Convenience Goods	Comparison Goods	Combined	Convenience Goods	Comparison Goods	Combined
Gross Floorspace (sqm)			4511			7900			-3389
Net Floorspace (sqm)	2038	1391	3,428	1650	4440	6090	388	-3050	-2662
Total Turnover (£m)	**16.7**	**6.5**	**23.2**	**17.3**	**20.0**	**37.3**	**-0.6**	**-13.5**	**-14.1**

7.4 As set out above, the floorspace which could be delivered as part of the approved scheme is significantly larger than that currently proposed (by around 3,400 sqm gross/2,700 sqm net, or c. 75%-80%). The total combined turnover forecast for the approved scheme is also significantly higher, by around £14m (or c. 60%), as is the comparison goods turnover in particular (by around £14m/200%). Whilst the level of net convenience goods floorspace proposed is slightly higher than before, this simply reflects that contained within the proposed Home Bargains store

– which has a much lower turnover to floorspace ratio – and, as such, the level of convenience goods turnover is broadly similar (and indeed slightly lower).

7.5 Whilst there were no end operators identified as part of the previous scheme, and the nature of the impacts forecast as part of this assessment have been adjusted to reflect those now proposed, the above helps to confirm the appropriateness of these current proposals in terms of impact. Although the impacts forecast as part of the current assessment vary slightly from the previous scheme, they are not sufficiently to warrant the Council arriving at a different conclusion in relation to the impact test.

7.6 Therefore in summary, the scheme that has been recently approved and deemed acceptable in terms of retail impact has both a greater quantum of overall floorspace and a higher projected turnover than the current proposals. Notwithstanding this, however, in order to be robust, and to assist Officers in the determination of the application, an assessment of the impact of the current proposals is provided below, having regard to the two criteria set out above.

Investment in Centres

7.7 It is not considered that the proposed development at Bankwood Way would have any adverse impact upon the ability to bring forward investment in existing centres, either within or beyond the PCA. This conclusion reflects a number of factors, including the fact that:

- as accepted by the Council in approving the previous retail scheme on the site, and re-confirmed in Section 6.0 of this statement, there are no other more sequentially preferable sites, located either within or on the edge of existing centres, which are suitable and available to accommodate the proposed development;
- the proposed development is of a different (and more significant) scale to those opportunities for new development/redevelopment and units with scope for refurbishment/re-occupation which do exist within/on the edge of existing centres in the PCA;
- we are not aware of any other planned investment in any of these centres which could be affected by the proposed development; and
- any other schemes which are coming forward or being promoted in other centres in the wider area, are more distant from the application site and/or serve different catchment areas and are highly unlikely to be affected by the current proposals.

7.8 It was also accepted by Kirklees Council, when granting planning permission for a much larger retail scheme on the same site, that such development would not have any significant adverse impact upon investment in centres. In this context, and given the absence of any comparable schemes coming forward in centres within the PCA of the proposed development, it is not considered that the currently proposed development would have any such adverse impact.

Vitality and Viability

Enhancing Consumer Choice

7.9 As explained in Section 5.0, the only foodstore of any significant size in Birstall is the existing M&S Foodhall at Birstall Shopping Park (c. 850 sqm net). Within the district centre itself, the main existing provision comprises Tesco Express and Co-op convenience stores, which provide in the region of 250-300 sqm net floorspace. Given their size, they are only capable of meeting day to day/to-up food shopping needs and are clearly not comparable to the new Lidl store proposed at Bankwood Way.

7.10 Elsewhere within the PCA (but outwith Birstall itself), there are Tesco Extra and Aldi stores in Batley District Centre (comprising 7,100 sqm net and 800 sqm net respectively), as well as smaller Asda and Iceland supermarkets, also in that centre. However, these facilities are located around 4.5km-5.0 km (by road) from the application site at Bankwood Way.

7.11 Based upon the survey work underpinning the Kirklees Retail Study, currently, it is estimated that just over half (around 54%) of convenience goods expenditure generated in the PCA is spent at stores within this area, with the remainder flowing to stores further afield. Such stores include Lidl and Morrisons store in Heckmondwike Town Centre, as well as Lidl, Asda and Sainsbury's within/on the edge of Dewsbury Town Centre and a Tesco supermarket in Cleckheaton Town Centre. It also includes large Asda and Morrisons superstores in Morley, just outside of Kirklees Borough.

7.12 In the absence of any sequentially preferable sites which are suitable and available, the proposed development of a new Lidl store on the application site would enhance the existing range of foodstore provision serving the PCA. It would reduce the need for local residents, particularly those living in Birstall, where existing provision is limited, to travel to stores further afield, including by private car, facilitating more sustainable travel patterns and retaining more spending in the local area.

7.13 The new Lidl store would complement, rather than competing directly with, existing provision within Birstall District Centre. Such provision includes the Tesco and Co-op convenience stores there, and the three other smaller/specialist operators, which would continue to meet more day to day and top-up needs, serving a different sector of the market to the new Lidl facility.

7.14 Whilst there are a small number of comparable facilities within/on the edge of existing centres – including Home Bargains stores in Cleckheaton and Morley, and a B&M store in Morley – the majority of existing comparison goods retail provision in the PCA is located at Birstall Shopping Park. This development is unrelated to existing defined centres and is therefore unprotected in planning policy terms. As with convenience retail, and as set out in Section 5.0, existing non-good retailers within Birstall District Centre are all small, independent traders, none of which would compete with the proposed Home Bargains to any significant extent.

7.15 The potential impact of the proposed new Lidl store upon the vitality and viability of existing centres should also be viewed in the context of a number of factors. These include:

- the fact that any diversion of trade will be spread across a range of food and non-food stores in the surrounding areas - including those both within and outside of existing defined centres - reflecting both the significant proportion of spending which is currently leaking out of the PCA to such facilities, and the extent to which the new store would draw linked trips with other existing facilities at Birstall Shopping Park;
- the strong trading performance of existing large and medium-sized foodstores within the PCA - including the Aldi and Morrisons stores in Batley and Heckmondwike (estimated to be achieving a convenience goods turnover of around 170% and 240% of their respective company averages), as well as Asda and Morrisons in Morley (around 170%-180% of their company averages);
- the fact that the majority of other existing convenience and comparison goods retail provision within existing centres in north-west Kirklees is generally small in scale, and would continue to perform a complementary role alongside the new foodstore in serving top-up and more specialist food shopping needs;
- the fact that the majority of uses within these centres, including the large proportion of service and other leisure and community uses, would remain unaffected by the proposed development at Bankwood Way; and

- the low number of vacant units located within Birstall District Centre in particular (3 no.), reflecting its current health and the role which it is successfully performing in meeting the day to day needs of local residents.

7.16 In the context of the above, it is not considered that the development proposed would have any significant adverse impacts, in terms of town centre vitality and viability and, in practice, would have a significant positive impact in terms of enhancing local consumer choice in the north-eastern part of Kirklees, including Birstall.

Trade and Turnover

7.17 The methodology used as part of this impact assessment, which was agreed with Council Officers and their retail consultants (Nexus), and a summary of the population and expenditure forecasts and flows can be found in **Appendix 1** of this Statement. In summary, it uses Zones 4 and 8-10 defined as part of the Council's latest (2016) retail study as the Study Area, and Zone 9 (comprising the Birstall and Batley area), as the Primary Catchment Area (PCA). It also uses base population and expenditure data, and the latest spending forecasts, provided by Experian, as well as spending patterns set out within the above study. The turnover of the proposed retail development has been forecast using floorspace information provided by Lidl as well as company average turnover to floorspace ratios provided by Global Data.

7.18 The assessment is based on the Study Area described in **Appendix 1** and illustrated on Lichfields Drg. No. GIS\LF\62129\01-01 at **Appendix 2**. In summary:

- Tables 1 to 3 in **Appendices 3 and 4** illustrate levels of population and convenience/comparison goods expenditure in the Study Area over the period between 2021 and 2031;
- Tables 4 and 5 illustrate convenience and comparison goods expenditure flows to existing stores and centres, both within and beyond the PCA, in 2021 and 2026, before any new development;
- the forecast turnover of the committed developments is set out in Table 6;
- Table 7 illustrates convenience and comparison goods expenditure flows in 2026, following implementation of the committed developments;
- the forecast turnover of the proposed new Lidl and Home Bargains stores is set out in Table 8;
- Tables 9 and 10 illustrate expenditure flows in 2026 and 2031, following implementation both the committed developments and proposed scheme at Bankwood Way; and
- Table 11 illustrate the trade diversions likely to occur from the proposed Lidl and Home Bargains stores, considered both in isolation and cumulatively with the committed developments.

Convenience Goods

7.19 As set out in **Appendix 1**, the forecast trade diversions have regard to the scale, nature and accessibility of both the committed/proposed developments and existing competing facilities. They also take into account the assessments previously prepared to accompany the applications for both the committed schemes and the previously approved development on the Bankwood Way site.

7.20 As illustrated in Table 11 at **Appendix 3**, the most significant convenience goods trade diversion impact forecast to result from the proposed development would be upon the existing Lidl store, at Northgate, in Heckmondwike Town Centre (10% - or 13% when taking into account committed developments). This reflects the identity of the proposed foodstore operator on the Bankwood Way site (i.e. Lidl) and, therefore, the extent to which the new proposal would draw trade from a directly comparable facility, particularly for customers living closer to the new store than that in Heckmondwike. However, whilst the Council's most recent retail study indicates that this store is performing below the company average, Lidl has confirmed that they have no concerns for the future viability of this store, should the subject application be approved, and indeed, would not be building a new store that would detrimentally harm an existing facility in their portfolio. It is Lidl's view that that store serves its own catchment area, based on Heckmondwike itself, complementary to that proposed at Bankwood Way.

7.21 The next highest impact is forecast upon the edge of centre Aldi store at Branch Road in Batley (7% or 9% cumulatively). This reflects the similar scale and nature of this store – as a discount foodstore operator – as well as its location, around 4.5 km (by road) to the south of the application site. However, this store is currently estimated to be performing well, achieving a turnover to floorspace ratio which is almost 70% above the Aldi company average, and could therefore comfortable withstand such an impact. On this basis, it is not considered that the approval of the subject application would have any significant adverse impact upon its overall viability.

7.22 The existing Tesco in Batley is forecast to experience a convenience goods impact of around 5%, with that forecast upon other shops in Batley Town Centre being around 4%. At this level, given the very high level of turnover currently being achieved by Tesco (estimated to be £65.6m), and as with Aldi, there is no prospect that the proposed development would have any significant impact upon the vitality and viability of either this store or the wider centre. This is not least given that the majority of existing convenience retail facilities in the centre are focused upon meeting top-up and more specialist needs, and would therefore not compete with the proposed development to any significant extent.

7.23 The convenience goods impact forecast upon Birstall District Centre is also around 4%. This reflects the fact that, whilst this is the closest defined centre to the application site, existing provision there is all small-scale, and therefore only capable of meeting the basic, day to day needs of its immediate surrounding catchment area. The proposed Lidl store would be complementary to such provision and, at this level, would not have any material adverse impact upon the overall vitality and viability of the centre.

7.24 The existing Lidl store at Commercial Street, on the edge of Dewsbury Town Centre, would experience an impact of c. 5 % (or c. 6% with committed developments). However, as with the company's store in Heckmondwike, whilst the Council's study indicates that it is performing below the company average, Lidl have confirmed that it is in fact achieving a significantly higher level of turnover, and that they have also confirmed that they have no concerns for its future viability – not least given its location around 5.5 km to the south of the application site as the crow flies, in Dewsbury, and the different catchment served.

7.25 The M&S Simply Food at Birstall – which is unrelated to existing centres - is forecast to experience a convenience goods impact of around 3% (4% with commitments), with all other impacts being around 2% or below. These are low levels of impact and reflect the extent to which the trade diversion generated by the proposals would be spread across a range of facilities, both within and beyond the PCA.

7.26 There is not considered to be any prospect that the proposed development would have a significant adverse impact upon the vitality and viability of any individual centre. This is particularly given the current health of Birstall District Centre, in particular, where there is only three units currently vacant. Whilst the new Lidl would compete most directly with existing discount facilities in the surrounding area, given the levels of impact forecast, none of these facilities are considered particularly vulnerable to the effects of a new store.

7.27 Given their scale and nature, the majority of facilities within existing centres, including Birstall and Batley, will continue to perform an important role in meeting the top-up shopping needs of local residents, including those living in their immediate vicinity. Furthermore, existing smaller and independent traders there would continue to benefit from a number of trading advantages. These include:

- the range and quality of the produce they are able to offer within their individual sectors;
- the more personal service they are able to offer;
- loyalty from their existing customer base; and
- proximity to other shops and services within these centres, from which they are able to pick-up spin-off trade.

7.28 The above impacts reflect the fact that diversion of trade to the proposed discount foodstores would be spread across a wide range of stores in the surrounding area - including a significant proportion which would be 'clawed-back' from stores outwith the PCA. Such stores include existing Asda and Morrisons stores in Morley, Lidl and Morrisons stores in Heckmondwike, and Asda, Sainsbury's and Lidl stores in Dewsbury. Given the number of stores over which the diversion would be spread, as well as their scale and the different catchment areas they serve, it is unlikely to result in any material impact upon their vitality and viability.

Comparison Goods

7.29 The impacts forecast upon existing comparison goods retail floorspace in the Study Area are set out in Table 11 of **Appendix 4**.

7.30 This table shows that, given the location of the development within a wider retail and leisure destination, drawing trade from a very wide geographic area, the comparison goods impacts would be spread over a large range of centres and stores including outside of the Study Area. With the exception of the committed developments (neither of which are related to existing centres), all of the impacts forecast upon such floorspace as a result of the proposed development would be low, at around or below 1%. Whilst the cumulative impacts upon existing stores/centres, also factoring-in the commitments, are slightly higher, they are all still below 2%, with the exception of Batley Town Centre (around 3%). These levels of impact are generally below that forecast and deemed acceptable on the previously permitted scheme on the application site.

7.31 The level of impacts forecast above reflect a number of factors, including the significant quantum of comparison goods expenditure which is leaking-out of the area to stores further afield – estimated to be around 50% (or £50m). This means that any diversion of trade would be spread across a range of different facilities both within and beyond the PCA, including those located outwith existing defined centres. This includes facilities at Birstall Shopping Park which, as set out above, is unprotected in planning policy terms.

7.32 The forecast impact upon Birstall District Centre (0.7%) reflects the very limited extent to which non-food retailers there (which are all smaller, independent facilities) would compete with the proposed floorspace. At this level, there is clearly no prospect that the vitality and viability of the centre would experience any material impact. This is particularly given the much wider catchment area that the new Home Bargains store would serve, given its location adjacent to Birstall Shopping Park, its accessibility from the M62 motorway, and the scope to generate linked trips from other facilities located at this park.

7.33 Whist slightly higher (1.1% - or 3.3% with commitments), the impact upon Batley is still not of a level which would result in any significant adverse impact. Whilst there is a small number of national multiples, the majority of comparison retailers in that centre are, again, smaller/independent, and generally specialist retailers, which would not be in direct competition with the new Home Bargains.

7.34 Although a proportion of the comparison goods trade diversion from this centre would be from the Tesco superstore, this store is currently trading well, and such diversion would not represent any threat to the store's overall viability. Indeed, the majority of the impact upon the centre is forecast to be generated by the new B&M store on the Blakeridge Mills site, which the Council have already found to be acceptable, and has indeed recently opened.

7.35 In practice, the vast majority of existing uses in both these and other centres within the wider Study – including retail and non-retail - would not be affected by the proposed development. In this context, given the low level of trade diversions forecast, and the fact that such diversion would be spread across a wide range of stores in the surrounding area, there is no prospect that the proposed development would result in any significant adverse impact upon existing centres.

Summary

7.36 It has been demonstrated that the proposed development on the Bankwood Way site in Birstall would not result in any significant adverse impact upon the vitality and viability of existing centres - either within or beyond the PCA - or upon existing and future planned investment in such centres. This reflects the conclusions previously reached in granting planning permission for a larger scale of retail floorspace on this site.

7.37 The proposed new Lidl store would enhance the exiting range of foodstore provision serving residents in the PCA, and Birstall in particular, and reducing the need for residents to travel to meet their needs. Any trade diversion for both convenience and comparison goods would be dispersed across a range of stores in the surrounding area, including those beyond the PCA. The majority of existing facilities within such centres will not compete directly with the new Lidl and Home Bargains stores and will continue to perform an important role in meeting the day to day and top-up shopping needs of local residents.

7.38 In this context, and as with the previously approved scheme on the site – which was significantly larger than that now proposed - is not considered that the development would have any significant adverse effect upon any existing defined centres.

8.0 Policy Assessment

8.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, this section considers the acceptability of the proposed development against the statutory development plan, as well as other material considerations.

Principle of Development

8.2 The Kirklees Local Plan Policies Map shows that the site is within a designated Priority Employment Area (PEA) (ref: PEA46). Policy LP8 (Safeguarding Employment Land and Premises) states that proposals for development for employment generating uses in such areas will be supported where there is no conflict with the established employment uses in the area. The Local Plan Glossary states that enterprises which provide jobs, for example, retail, hotel, assembly and leisure are to be considered as employment generating uses. Furthermore, it was recognised in the extant planning permission for retail development on this site (2018/92563) that retail is an employment generating use. Therefore, development of this site for retail uses is considered an appropriate form of development and is in accordance with Policy LP8. Furthermore, the proposed scheme provides for a total net convenience goods sales area of 2,037 sqm which equates to 331 sqm less than that permitted by the extant outline permission and it was deemed that the retail impact was acceptable in this case.

Town Centres and Retail

8.3 As set out in Section 4.0, Policy LP 13 states that Town Centres and Local Centres will remain the focus of shopping, commercial, cultural and social activity. The application site lies around 1.75 km walking distance from the defined boundary of Birstall District Centre. It therefore occupies an out-of-centre location in the context of national planning policy.

8.4 It has been demonstrated in Section 6.0 that there are no potential alternative sites or vacant units within and on the edge of Birstall, Batley and Morley Town Centres, which could accommodate the proposed development. None of the sites identified are suitable and available to accommodate the proposed development due to a range of constraints, including size/shape, location, existing and proposed uses, and policy considerations. In addition, some of the sites considered are not sequentially preferable to the application site at Bankwood Way. This also reflects the conclusions reached by the Council when approving the previous application for new retail development on the subject site.

8.5 Policy LP 13 also states that an Impact Assessment will be necessary for proposals which include retail development which are not located within a defined centre and where the proposal provides a floorspace greater than 500 sq.m gross. Section 7.0 of this Statement and the accompanying appendices set out the results of the Impact Assessment which has been undertaken in relation to this proposal. In summary, the Impact Assessment has demonstrated that the proposed development would not result in any significant adverse impact upon the vitality and viability of existing centres - either within or beyond the PCA - or upon existing and future planned investment in such centres. This reflects the conclusions previously reached in granting planning permission for a larger scale of retail floorspace on this site. The proposed new Lidl store would enhance the exiting range of foodstore provision serving residents in the PCA, and Birstall in particular, and reduce the need for residents to travel to meet their needs. Any trade diversion for both convenience and comparison goods would be dispersed across a range of stores in the surrounding area, including those beyond the PCA. The majority of existing facilities within such centres will not compete directly with the new Lidl and Home

Bargains stores and will continue to perform an important role in meeting the day to day and top-up shopping needs of local residents.

8.6 It is therefore considered that the proposal complies with Policy LP 13 and that the Sequential and Impact tests have been met.

Design

8.7 Policy LP 24 states that proposals should promote good design by ensuring, inter alia, the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape.

8.8 The scale of the proposed stores is in keeping with the surrounding uses. Both stores will have a contemporary design that is in-keeping with the Lidl and Home Bargains brand identities, yet also responds appropriately to the local context. The proposed building materials include insulated metal walling panels in white and grey, as well as grey roofing panels. The Lidl store will have a glazed shopfront on the store's eastern elevation. A comprehensive landscaping scheme will be implemented across the site. These contemporary materials and soft landscaping are considered to be appropriate to the site's setting and will improve the appearance of the site and wider retail park.

8.9 The layout of the final proposal has been reached following an iterative design process, taking into account accessibility; natural surveillance and security; as well as the operational needs of Lidl and Home Bargains. The application scheme represents the optimum layout for the site, responding to the different factors mentioned above and providing good accessibility and clear wayfinding for visitors.

8.10 Furthermore, the proposals provide for 1 rapid 50kW charging point which is capable of charging two cars at once and is equipped with multiple connections to suit different makes of vehicle.

8.11 The proposed development is considered to fully accord with the provisions of Policy LP 24.

8.12 Further details on the proposed design and architectural rationale can be found in the accompanying Design and Access Statement.

Other Technical Considerations

8.13 The compliance of the proposed development with policy considerations in respect of more technical considerations including design, highways, flooding and drainage, noise, air quality, ground, ecology and trees are demonstrated in the wider application submission including the following documents:

- Design and Access Statement;
- Health Impact Assessment;
- Transport Assessment and Travel Plan;
- Flood Risk Assessment and Detailed Drainage Strategy;
- Noise Assessment;
- Air Quality Impact Assessment, prepared by Wardell Armstrong;
- Combined Phase 1 and Phase 2 Ground Investigation Report and Coal Mining Risk Assessment;
- Ecological Impact Assessment; and,

- Arboricultural Assessment.

8.14 In relation to highways considerations, in accordance with Local Plan Policy LP 21, the application site is easily accessible via a range of transport modes and the proposed development would provide safe and convenient access for pedestrians, cyclists and public transport users, as well as those travelling by car. In accordance with policy LP 22, the proposed development incorporates suitable parking provision based upon the nature of the proposals and the site location, including 175 car parking spaces including 10 accessible spaces, 2 electric vehicle charging spaces, and 9 parent and child spaces. It is proposed that 6 cycle parking stands will be provided adjacent to the Lidl store to accommodate up to 12 cycles. One rapid 50kW charging point which is capable of charging two cars at once will be provided.

8.15 In line with paragraph 170 of the NPPF and local planning policy LP 30, whilst, the Biodiversity Net Gain Technical Note concludes that the proposed development would amount to a relatively minor measurable net loss in biodiversity value of c. 1.49 biodiversity units, Lidl are keen to liaise with the Council on this matter and explore options to address this.

8.16 In accordance with Local Plan Policy LP47, a Health Impact Assessment has been undertaken in line with the Council's guidance and concludes that overall, the proposed development will have a positive impact on the identified receptor groups across most of the determinants of health. The submitted Health Impact Assessment, Air Quality Assessment and Noise Assessment demonstrate that the proposals will not result in unacceptable impacts in terms of noise, air and light pollution in line with Policy LP 52.

9.0 Sustainable Development

9.1 Paragraph 212 of the NPPF states that its policies are material considerations which should be taken into account in the determination of planning applications. At the heart of the NPPF is a presumption in favour of sustainable development, and paragraph 8 explains that there are three dimensions to sustainability:

- an economic objective;
- a social objective; and
- an environmental objective.

9.2 This section considers how the application proposals will contribute to the building of a strong, responsive and competitive economy that supports vibrant and healthy communities and contributes to the protection and enhancement of the natural and built environment.

Economic Contribution

9.3 National planning policy requires LPAs to positively and proactively encourage sustainable economic growth and that significant weight should be placed on the need to support economic growth and productivity.

9.4 The proposed development will provide a source of employment for the surrounding areas, creating 110 additional full time and part time jobs across both stores with a range of roles available.

9.5 These figures relate to gross employment, and do not take into account either any potential displacement of existing employment or any employment multiplier impacts, including any indirect or induced employment that could be supported. This includes employment which will be generated through spending in the local economy by those employed at the new stores, and through the use of local firms/suppliers.

9.6 The subject application proposals represent a sizeable investment in the local area and would also generate new employment during the construction phase, a proportion of which will be captured at the local level, as well as related spin-off jobs. The proposed development will therefore result in a boost to local employment and the local economy, and it should also be noted that this proposal forms part of a significant development programme by Lidl which will deliver hundreds of new jobs and millions of pounds of investment in Kirklees.

9.7 In addition, the NPPF advises that local authorities should promotes the vitality and viability of existing town centres. It has been demonstrated in Section 7.0 that the proposed development would not have any significant adverse impact upon existing centres. It has also been demonstrated that there are no sequentially preferable opportunities which are suitable and available to accommodate the proposed development.

9.8 In practice, the proposed development would strengthen the role of Birstall Shopping Park as a regional shopping and leisure destination, bringing additional consumer spending and investment into Kirklees.

9.9 In the context of the above, it is clear that the proposed development would have a significant positive impact in economic terms.

Social Contribution

9.10 The NPPF seeks to support strong, vibrant and healthy communities by, amongst other things, fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

9.11 Retail employment has become increasingly important in recent years, and this has been further highlighted by the loss of other service-sector jobs caused by the coronavirus pandemic. The positions created within the stores would include those in management, checkouts, customer service, restocking, security and cleaners. Such opportunities can represent a good route into employment and represent a stepping stone towards other forms of employment and increasing skill levels.

9.12 The proposed development will bring a vacant and run-down site back into active use and will feature an attractive store design with modern materials which provide a positive response to the setting. Soft landscaping will help create an inviting development which integrates well with the site constraints. The site will be safe and accessible. The proposed development would therefore make a significant positive contribution to the social dimension of sustainable development.

9.13 The Health Impact Assessment included within the wider submission considers the health impacts of the proposed development on the identified priority groups and the general population of the area. The assessment concludes that overall, the proposed development will have a positive impact on the identified receptor groups across most of the determinants of health. The positive outcomes are linked to the creation and enhancement of social networks; the accessibility of the site by sustainable modes of transport; improved road safety; improved access to affordable healthy food; improved community safety in terms of anti-social behaviour; improved soft landscaping; the generation of employment opportunities; and, actions to combat climate change. In terms of construction (air quality, noise and water pollution), the anticipated impacts for all identified receptor groups are negligible, provided that the recommended mitigation measures are implemented.

Environmental Contribution

9.14 As required by the NPPF, proposed new developments should contribute to, protect and enhance the natural and built environment.

9.15 The application site is considered to represent a sustainable location for the proposed development, due to its proximity to surrounding residential areas. The proposed development would provide safe and convenient access for pedestrians, cyclists and public transport users, as well as those travelling by car.

9.16 Lidl is committed to achieving low energy sustainable development through both the day-to-day running of its stores and designing sustainability initiatives within its buildings. As a group, Lidl operates a corporate environmental policy which represents a conscious effort to reduce carbon emissions through store design and operating procedures.

9.17 Key features which will be implemented in respect of the proposed new Lidl store are as follows:

- a 180kWp Solar PV system will be installed onto the roof of the new Lidl foodstore and will generate approximately 25% of the store's electricity requirements per year, reducing carbon emissions by at least 44 tonnes per year. The Solar PV panels will be installed flush onto the store's roof and are also non-reflective to avoid glare;
- the store will be heated using a refrigeration waste heat recovery system. This form of renewable energy recovers waste heat from the food chilling equipment and is used to provide heating to the main sales area, warehouses and offices area. The use of this system will reduce carbon dioxide emissions by 26%;

- temperature levels within the store will be controlled by a Building Management System (BMS) and will vary throughout the store dependent on the use of each area;
- low energy lighting design, using highly efficient LED luminaires, will be used throughout the store;
- all lighting will be connected to the BMS. The lighting within the sales area will be controlled by timers linked to the opening times of the store which means that lighting is not left on unnecessarily. The sales area uses full lighting during trading hours and cuts back to one third lighting before and after trading hours to allow for the stocking of the store. Occupancy lighting controls will be used on non-retail areas;
- BMS and LUX sensors also power the external lighting. This means that lights are only on during dark hours and ensures that they do not remain on later than one hour after the store closes;
- water consumption is carefully monitored and there are sensors on the taps in the toilets in order to minimise usage and prevent wastage from them being left on;
- Lidl use '4 fan' chiller condenser units, which are externally mounted. These units are designed to omit very little noise and be as environmentally friendly as possible;
- Lidl undertake careful planning of store stock levels, stock availability and deliveries to the foodstore to ensure unnecessary journeys are avoided and the maximum amount of products possible are delivered per litre of fuel used. In addition, Lidl will optimise each delivery by returning all waste to the distribution depot on the lorry's return journey, and there are no separate waste collections made their stores;
- an Integrated Waste Management Policy, which complies with relevant legislation and minimises the impact of the foodstore on the environment, will be used with high packaging recoverability as a result of Lidl's efficient delivery and stocking system. Lidl will install waste handling equipment, such as a plastic/cardboard baler, into the store; and
- Lidl install manually operated 'dock levelling' plates within new stores which are used in conjunction with a sloped loading ramp. These 'dock levelling' plates replace hydraulic scissor lifts, which were previously used by Lidl, and have significantly lower energy consumption levels.

9.18 As a result of all of the above, the Lidl foodstore building is likely to achieve a high standard of energy efficiency and performs well in excess of Part L minimum requirements.

9.19 Home Bargains also seek to minimise environmental impact of its stores both in store and as part of its supply chain. It achieves this by fulfilling the following sustainability objectives:

- Stores are fitted with energy efficient Led lighting throughout, including motion sensors linked to a Building Management System which can be monitored at head office. LED car parking & building mounted lighting is also installed;
- Waste produced by all stores is collected and sent back to the main office depot for recycling and reuse if possible, wherever possible packaging is reused to package internet deliveries;
- Home Bargains fund the safe disposal of all electrical equipment and battery bins are present for customer use in each store; and
- Staff Travel Plans are adopted and reviewed on a regular basis.

Electric Vehicle Charging

9.20 Policy LP 24 states that proposals should promote good design by ensuring high levels of sustainability, including by providing charging points to encourage the use of electric and low emission vehicles.

9.21 The proposed development will include 1 rapid 50kW charging point which is capable of charging two cars at once and is equipped with multiple connections to suit different makes of vehicle. Typical fast chargers take 3-4 hours to charge a small electric vehicle, whereas the 50kW rapid charger proposed at the site will charge the same car from flat in 30 minutes. It should also be noted that Lidl does not charge customers for using EVC points at any of its stores and is one of the only supermarket operators to offer this service free of charge.

9.22 It is considered that the proposed rapid EVC point is the most appropriate form of charging point for the development, given the speed of charging it can provide and the average time spent by customers whilst shopping.

Biodiversity Net Gain

9.23 In line with paragraph 170 of the NPPF and local planning policy LP 30 the development must seek a net gain in biodiversity. The Biodiversity Net Gain Technical Note submitted with the application concludes that the proposed development as illustrated on the illustrative landscape strategy plan would amount to a relatively minor measurable net loss in biodiversity value of c. 1.49 biodiversity units, equating to a 82.33% net loss in biodiversity value. Lidl are keen to liaise with the Council on this matter and explore potential adjustments to the landscaping scheme to accommodate the biodiversity net gain. Alternatively, it will be necessary for off-site contributions to be made to the Local Planning Authority or 3rd-party land owner to create the required deficit of units off-site.

Summary

9.24 Overall, the proposed development will make an important contribution to the economic, social and environmental well-being of the local area. Taking all relevant considerations from paragraphs 18 to 219 of the NPPF into account, it is considered that the application proposal represents sustainable development and, as such, there should be a presumption in favour of the scheme, as required by the NPPF.

10.0 Conclusions

10.1 This Planning and Retail Statement has been prepared by Lichfields on behalf of Lidl GB UK to accompany a full planning application for the redevelopment of land off Bankwood Way, Birtsall for a Lidl foodstore and Home Bargains store. It addresses the key sequential and impact tests, as set out in the NPPF, as well as other national and local planning policy.

10.2 Outline planning permission was granted in January 2020 for the development of four retail units, with associated access, parking and landscaping, on the application site (planning ref: 2018/92563). This permission has established the principle of retail development on the site. Indeed, that allows for a greater level of retail floorspace than is proposed as part of this application. In particular the level of convenience goods floorspace proposed as part of this application (2,037 sq.m) is less than that which Condition no.7 of the extant permission allows for. Furthermore, it has been demonstrated that the turnover of the proposed development both in convenience and comparison goods terms is less than that forecast in the previously approved scheme. Condition no 7 attached to this currently allows the use of up to 2,368 sqm floorspace for convenience goods sales on the site. The proposed scheme provides for a total net convenience goods sales area of 2,037 sqm which equates to 331 sqm less than that permitted by the extant outline permission. Consequently, the level of convenience goods retail floorspace in the proposed development is significantly lower than that which could have come forward as part of the approved scheme.

10.3 This Statement has identified a pressing need for additional convenience retail provision within the defined PCA. Presently, it is estimated that just over half (around 54%) of convenience goods expenditure generated in the PCA is spent at stores within this area, with the remainder flowing to stores further afield. This lack of convenience retail provision is therefore leading to unsustainable shopping and travel patterns.

10.4 In relation to the sequential test, potential alternative opportunities within and on the edge of existing defined centres within the defined PCA were considered in terms of their potential to accommodate the proposed development. It has been demonstrated that none of these sites are suitable and available to accommodate the proposed development, due to a range of issues, including size/shape, location, existing and proposed uses, and policy considerations. In addition, some of the sites considered are not sequentially preferable to the application site at Bankwood Way. As such, the subject application is considered to be compliant with the sequential approach to site selection set out in Policy LP 13 and the NPPF.

10.5 Reflecting the conclusions previously reached in approving the previous scheme, it has again been demonstrated that the proposed development would not result in any significant adverse impact, either upon investment in centres, or town centre vitality and viability. This reflects the fact that:

- There are no comparable schemes currently planned within existing centres in the PCA which could be materially affected by the proposed development, any investment which is planned in centres further afield would serve a different role and function, and indeed catchment area, to the development proposed on the application site, and is therefore unlikely to be affected by the scheme;
- The only foodstore of any significant size in Birstall is the existing M&S Foodhall at Birstall Shopping Park. Within the district centre itself, the main existing provision comprises Tesco Express and Co-op convenience stores, as well as the three other smaller/specialist operators, which would continue to meet more day to day and top-up needs, serving a different sector of the market to the new Lidl facility;

- The new Lidl store would complement, rather than compete directly with, existing provision within Birstall District Centre. Diversion of trade to the proposed discount foodstores would be spread across a wide range of stores in the surrounding area - including a significant proportion which would be 'clawed-back' from stores outwith the PCA. Such stores include existing Asda and Morrisons stores in Morley, Lidl and Morrisons stores in Heckmondwike, and Asda, Sainsbury's and Lidl stores in Dewsbury. Given the number of stores over which the diversion would be spread, as well as their scale and the different catchment areas they serve, it is unlikely to result in any material impact upon their vitality and viability; and
- In relation to the Home Bargains store, whilst there are a small number of comparable facilities within/on the edge of existing centres, the majority of existing comparison goods retail provision in the PCA is located at Birstall Shopping Park. This development is unrelated to existing defined centres and is therefore unprotected in planning policy terms. As with convenience retail, existing non-good retailers within Birstall District Centre are all small, independent traders, none of which would compete with the proposed Home Bargains to any significant extent. Furthermore, given the low level of trade diversions forecast, and the fact that such diversion would be spread across a wide range of stores in the surrounding area, there is no prospect that the proposed development would result in any significant adverse impact upon existing centres.

10.6 In the context of the above, the proposed development is considered to satisfy the sequential and impact tests, set out in Policy LP 13 and the NPPF.

10.7 More widely, it has been demonstrated through the wider application submission that the proposals accord with all other relevant policies in the adopted Kirklees Local Plan. This includes compliance with technical policies including design, highways, flooding and drainage, noise, air quality, ground, ecology and trees. Furthermore, in accordance with Local Plan Policy LP47, a Health Impact Assessment has been undertaken in line with the Council's guidance and concludes that overall, the proposed development will have a positive impact on the identified receptor groups across most of the determinants of health.

10.8 The proposed development would also result in a number of other benefits, including generating new employment during both the construction and operational phases of the development, regenerating a currently vacant site in a prominent location, and the inclusion of a range of sustainability features within the new stores.

10.9 The NPPF states that decisions should apply a presumption in favour of sustainable development, and in accordance with paragraph 11c, as a proposal which represents sustainable development in accordance with an up-to-date development plan, the application should be approved without delay.

Appendix 1: Retail Assessment Methodology

The broad methodology adopted in assessing the subject application proposals in terms of the sequential and impact tests has been discussed and agreed with both Council Officers and the Council's retail advisors (Nexus Planning) prior to submission of this planning application.

As part of this, the use of a Study Area, based on Zones 4, 8, 9 and 10 adopted as part of the Kirklees Retail Capacity Study Update (2016), was agreed. As explained further below, it was also agreed that Zone 9, as defined within this study (which comprises the north-eastern parts of the Borough), would comprise the Primary Catchment Area (PCA) for the purposes of this assessment.

In relation to the sequential approach in particular, it was agreed that:

- the assessment would focus upon sites within/on the edge of Batley Town Centre and Birstall District Centre; and
- whilst located outwith both the PCA and Kirkless Borough, given its proximity to the site, the assessment would also consider sites in relation to Morley Town Centre, in Leeds.

In terms of the quantitative retail impact assessment, the following key data inputs and assumptions were agreed with Officers/their retail advisors:

- the use of base population estimates from Experian and the latest (2018-based) sub-national population projections;
- the use of 2019-based estimates of average convenience and comparison goods expenditure per capita within the PCA/wider study area obtained from Experian, along with their latest expenditure forecasts and estimates of non-store retailing/special forms of trading, as set out in Retail Planner Briefing Note 18;
- the market share of existing stores and centres within the PCA/Study Area, as set out in the Kirklees Retail Capacity Study Update (2016), in order to estimate their convenience and comparison goods turnover;
- the nature of developments required to be factored-in to the assessment as 'commitments' (comprising the schemes approved on the Kenmore Caravans and Blakeridge Mills sites); and
- the use of turnover to floorspace ratios obtained from Global Data, in order to forecast the turnover of committed and proposed retail developments.

The methodology applied in respect of the sequential and impact assessments is set out in more detail below.

Sequential Site Assessment

As set out above, it was agreed that the sequential assessment would focus upon sites within/on the edge of Batley and Morley Town Centres, and Birstall District Centre. The methodology adopted in identifying potential alternative sites in the context of the sequential approach has involved:

- consideration of sites allocated for development in the development plan;
- reviewing extant permissions and current applications for retail development; and

- identifying other sites or buildings with potential for development, through a web-based desk-top review.

The application site extends to 1.53 ha, reflecting the scale of both proposed stores and the requirements for servicing areas and directly accessible surface car parking. Notwithstanding this, the approach to the sequential assessment has taken into account the need to apply flexibility in terms of format and layout.

Taking into account the need for such flexibility, a thorough assessment has been made to establish the suitability and availability of identified sites to accommodate the retail and leisure uses proposed on the application site. The criteria adopted for the site assessments has been as follows:

- site size - any potential alternative sites would need to be able to accommodate new retail development of a similar scale and nature, with associated parking, servicing and landscaping, taking into account the need for flexibility set out in the NPPF. Sites have not been excluded from the initial assessment based upon site size, however, this has been a key factor in considering their suitability;
- whether the site lies within, or on the edge of, existing centres;
- whether there are any development plan policies relevant to the sites identified;
- whether the sites can be satisfactorily serviced and accessed by vehicles;
- whether there are any extant permissions for development on the sites identified, and details of any other proposals;
- whether there are any land assembly issues (e.g. multiple ownership) which could constrain the potential for future development;
- what the current land uses are at each site, and whether there is a requirement for their relocation;
- whether the site is likely to be commercially attractive to operators; and
- other potential constraints to development, for example conservation area or listed building status, tree preservation orders, topography, etc.

Impact Assessment

An assessment of the likely impact of the proposed retail development has been undertaken, having regard to a quantitative assessment of the levels of trade diversion forecast upon existing stores and centres. As set out above, this assessment uses, as a starting point, information contained within the Kirklees Retail Capacity Study Update produced in 2016.

Defining a Study Area

This assessment is focused on stores and centres across the following four zones (also known as the Study Area), which are in turn based on those defined as part of the 2016 Retail Capacity Study Update:

- Zone 4 – Heckmondwike and Cleckheaton;
- Zone 8 - Dewsbury;
- Zone 9 – Birstall and Batley; and
- Zone 10 – Outer North and East.

Given the location of the subject site, and the likelihood that the proposed new retail floorspace would draw the most significant proportion of its trade from the north-eastern part of the Borough, Zone 9 has been defined as the Primary Catchment Area (PCA) for the purposes of this assessment.

However, it is acknowledged that the site lies in close proximity to a wide range of other retail and leisure facilities, including Birstall Shopping Park (which includes, amongst other things, an Ikea furniture store and a Showcase cinema), and is conveniently accessible from the M62 motorway. It is therefore also likely to draw a significant proportion of its trade from areas further afield, as people combine their trips to Lidl/Home Bargains with visits to these other retail and leisure facilities.

The inclusion of Zones 4, 8 and 10 as part of a wider Study Area reflects the fact that people from other parts of Kirklees/West Yorkshire would be likely to use the proposed facilities. In addition, however, and particularly given the location of both the application site and Birstall Shopping Park adjacent to the M62, it is likely that an element of the turnover of the new retail floorspace would originate from beyond this wider Study Area. This trade has therefore been factored-in to the assessment summarised in Section 7.0.

Population and Expenditure

As set out above, levels of population within each zone of the defined Study Area have been based on estimates obtained from Experian (based in turn on the 2011 Census). These estimates have then been projected forward for over the period to 2031 using 2018-based Sub-National Population Projections and Mid-Year Estimates provided by the Office of National Statistics (ONS).

As set out in Table 1 (Appendix 3), the population of the Study Area as a whole is forecast to increase from around 326,500 in 2021 to c. 336,600 in 2031 – an increase of around 10,100 persons (3%). In relation to Zone 9 (the Primary Catchment Area) in particular, the population is forecast to increase by approximately 1,000 persons (just over 2%), from around 45,400 to c. 46,400.

Levels of convenience and comparison goods expenditure per capita in 2019 in each zone have also been sourced from Experian. Forecasts set out in their Briefing Note 18 (October 2020) have been used, in order to project comparison goods expenditure forward over the period to 2031. This note takes into account the impact of the Covid-19 pandemic, and associated restrictions, upon the UK economy and is therefore the most up to date advice available from Experian on future levels of consumer spending.

A proportion of expenditure per capita has been deducted to reflect expenditure via non-store retail sales (primarily internet purchases), also using information within the above Briefing Note which, again, has regard to the effect of the recent pandemic. This excludes purchases made online which go through actual retail stores (for example click and collect) and therefore still generate a demand for physical retail floorspace.

In the context of the above, Table 3 in Appendices 3 and 4 illustrates forecast growth in total convenience and comparison goods expenditure across the Study Area. This table illustrates that convenience goods expenditure will increase by around £13.7m (around 2%) between 2021 and 2031 across the Study Area, from £647.4m to £661.1m – and from £83.1 to £84.2m over the same period in the PCA (growth of £1.1m/c. 1%).

It also shows that comparison goods expenditure will increase by around £242.3m (c.30%) over the same period across the Study Area as a whole, from £819.1m to £1,061.5m, and by around

£28.1m (28%) within the PCA in particular, from £99.0 to £127.1m. This reflects the growth in non-food spending forecast by Experian in the medium to long term, post-pandemic.

Floorspace and Turnover of Existing Retail Floorspace

Net retail floorspace data for existing stores and centres within/immediately beyond the PCA has been obtained from a range of sources, including information provided by the Oxford Retail Consultants (ORC) Storepoint directory, the Council's own retail study and surveys of the relevant centres, also undertaken by the Council. This floorspace data relates to the proportion of stores dedicated to the sale of convenience goods, in order to undertake a 'goods-based' quantitative analysis.

The convenience and comparison goods turnover of the main centres and stores in the Study Area in 2026 - the Design Year of the proposed development - originating from within the Study Area, has been estimated using information contained within Kirklees Retail Capacity Study Updated produced in 2016. Whilst this study was based on household shopping surveys undertaken in 2013, it nevertheless provides a useful starting point for assessing existing spending patterns across the Study Area. The shopping patterns for convenience and comparison goods set out within this study have been applied to the total quantum of expenditure within each zone, in order to provide an estimate of the turnover of stores and centres within/immediately beyond the PCA.

As part of these turnover estimates, an allowance for inflow of convenience and comparison goods expenditure into the Study Area, from residents living outside of this area, has also been made. This takes into account spending at stores within the Study Area by those visiting friends and family, and people passing through the area on route to destinations further afield.

It includes those visiting existing retail and leisure facilities at Birstall Shopping Park and making a linked trip to the proposed new retail floorspace. It also takes into account the location of the shopping park and application site adjacent to the M62 motorway, which means that the site is easily accessible by car from other parts of West Yorkshire and indeed areas beyond.

Committed Developments

Based on discussions with Council Officers, there are two planning permissions for significant new retail development in the defined Study Area which need to be factored-in to this assessment. These comprise permissions for the new B&M store on the Blakeridge Mills site in Batley – which has recently opened but was not approved until after the Council's latest retail study was undertaken – and a foodstore on the Kenmore Caravans site, in Mirfield.

In relation to the scheme on the Blakeridge Mills site, which include a B&M store of 2,323 sqm gross, it has been assumed that:

- the store would have a net to gross ratio of 80%, resulting in a net sales area of 1,858 sqm;
- 20% of this net sales area (372 sqm) would be used for convenience goods sales and 80% (1,487 sqm) would be used for comparison goods sales (based on the application's accompanying documents0; and
- the convenience and comparison goods sales areas will achieve a turnover to floorspace ratio of £4,526 per sqm for both convenience and comparison goods, based on the B&M company average, as sourced from Global Data (as adjusted to 2019 prices and allowing for increase in turnover efficiency over the period to 2026).

In relation to the discount foodstore approved on the Kenmore Caravans site (which comprised 1,837 sqm gross/1,254 sqm net floorspace), it has been assumed that:

- 80% of this net sales area (1,003 sqm) would be used for convenience goods sales and 20% (251 sqm) would be used for comparison goods sales; and
- the convenience and comparison goods sales areas will achieve turnover to floorspace ratios of £11,143 per sqm and £7,555 per sqm respectively, based on the company average of Aldi – considered to be the most likely operator - as sourced from Global Data (adjusted to 2019 prices and allowing for increase in turnover efficiency for comparison goods over the period to 2026).

As illustrated in Table 6 at Appendices 3 and 4, it is therefore forecast that the two commitments, combined, would achieve total convenience and comparison goods turnovers of £12.9m and £8.6m respectively. However, should the scheme approved on the Kenmore Caravans site not come forward for any reason, then the total turnover generated by 'committed' schemes would be significantly lower, particularly for convenience goods (at just £1.7m), as would the resultant impacts.

Floorspace and Turnover of Proposed Development

In forecasting the turnover of the proposed 2,231 sqm gross/1,414 sqm net Lidl store, it has been assumed that:

- 80% of this net sales area (1,131 sqm) would be used for convenience goods sales and 20% (283 sqm) would be used for comparison goods sales; and
- the convenience and comparison goods sales areas will achieve turnover to floorspace ratios of £11,346 per sqm and £6,630 per sqm respectively, based on the company average of Lidl, as sourced from Global Data (allowing for growth in turnover efficiency for comparison goods and adjusted 2019 prices).

As illustrated in Table 6 at Appendices 3 and 4, it is therefore forecast that the proposed discount foodstore would achieve total convenience and comparison goods turnovers of £12.9m and £1.9m respectively.

In relation to the proposed Home Bargains store, it has been assumed that:

- the 2,280 sqm gross unit would have a net sales area of 2,014 sqm (based on information from Home Bargains);
- around 45% of this net sales area (906 sqm) would be used for convenience goods sales and 55% (1,108 sqm) would be used for comparison goods sales; and
- these sales areas will achieve a turnover to floorspace ratio of £4,205 per sqm, based on the Home Bargains company average for all goods, as sourced from the Mintel Retail Rankings (allowing for growth in turnover efficiency and adjusted 2019 prices).

On the basis of the above, the store is forecast to have convenience and comparison goods turnovers of £3.8m and £4.7m respectively. However, should the store have a lower net to gross ratio, for example, then these forecast turnovers would be lower.

In total, as illustrated in Table 6 (a) at Appendices 3 and 4, the proposed development is forecast to generate around £16.7m and £6.5m total convenience and comparison goods turnovers respectively. Table 8 (b) at Appendix 3 illustrates that the most significant proportion of the turnover (around 50% for Lidl and 40% for Home Bargains) would be drawn from the Primary Catchment Area (i.e. Zone 9 – Birstall and Batley) - equating to £8.0m and £2.8m for convenience and comparison goods respectively.

These proportions reflect the location of the proposed development within Zone 9, although also the fact that the new retail uses will draw a significant proportion of their trade from the wider study area, given their location adjacent to the M62 and Birstall Shopping Park. They also take into account the retail assessment prepared to accompany the previous application proposals on the same site, and the increased likelihood that the Home Bargains store, in particular, would attract linked trips from other existing facilities at the shopping park.

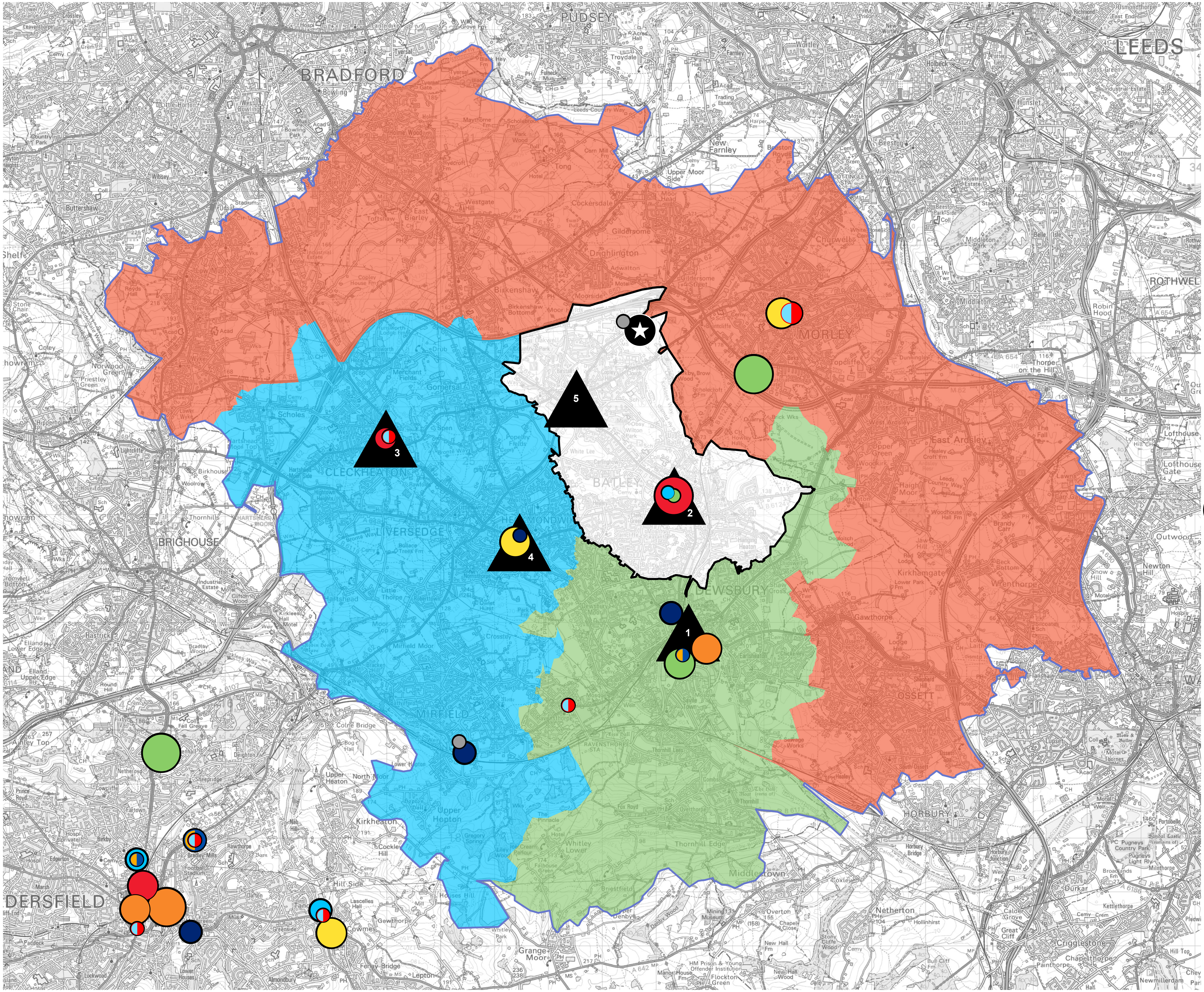
Retail Impact

An assessment of the impact of the proposed development has been undertaken. This has regard to a quantitative assessment of the levels of trade diversion forecast upon existing stores and centres as a result of the proposed retail floorspace.

It also considers the impact of the proposed developments upon planned investment in centres and upon the vitality and viability of existing centres, taking into account consumer choice. In particular, it considers impact over the period of five years from the base year of the assessment (i.e. up to 2026 - the Design Year). This quantitative assessment is based upon levels of population and retail expenditure within the defined Study Area, as set out above. It is based upon an assessment of the likely origin of the turnover of the proposed new Lidl and Home Bargains stores, and the likely trade draw from existing stores.

The estimation of the origin of the turnover of the proposed development reflects its scale, nature and accessibility, as well as the existence and accessibility of the main competing stores. The assessment of impact then takes into account the extent to which the committed and proposed new retail floorspace would draw trade from the other retailers, located both within and beyond the PCA. This has regard to the location and characteristics of competing stores, and the nature of the retail offer in these stores, compared with that which would be on offer at the proposed development. It also has regard to the assessments previously prepared in respect of the committed developments and that previously approved on the Bankwood Way site.

Appendix 2: Study Area and Existing Retail Provision



Key

Site

Primary Catchment Area

Study Area

Zone 4 - Heckmondwike & Cleckheaton

Zone 8 - Dewsbury

Zone 10 - Outer North and East

Existing Centres:

Centre

1. Dewsbury Town Centre (Principal Town Centre)
2. Batley Town Centre
3. Cleckheaton Town Centre
4. Heckmondwike Town Centre
5. Birstall District Centre

Existing Foodstores:

Operator:

- Aldi
- Asda
- Lidl
- Morrisons
- Sainsbury's
- Tesco
- Other
- B&M
- Home Bargains

Net Sales Area (SQM):

- 5,000+
- 2,500 - 4,999
- 1,000 - 2,499
- 500 - 999

0 1 2km

LICHFIELDS

Project	Lidl, Bankwood Way, Birstall
Title	Study Area and Existing Provision Plan
Client	Lidl UK GmbH
Date	11.02.2021
Scale	1 : 65,000 @ A3
Drawn by	MAR
Drg. No	GIS\LF\62129\01-01

N

GIS Reference: S:\LF Jobs\LF62129 - Lidl, Birstall\LF62129 - Lidl, Birstall - Study Area and Existing Provision - 01.02.2021.mxd

Appendix 3: Convenience Goods Impact Assessment

PROPOSED LIDL FOODSTORE, BANKWOOD WAY, BIRSTALL

CONVENENIENCE GOODS RETAIL IMPACT ASSESSMENT

Table 1: Population of Study Area

Zone	2011	2019	2021	2026	2031	Growth 2019-2021		Growth 2021-2026		Growth 2021-2031	
						Persons	%	Persons	%	Persons	%
Zone 9 - Birstall and Batley (Primary Catchment Area)	43,349	45,129	45,411	45,984	46,447	1,780	4.1%	573	1.3%	1,036	2.3%
Zone 4 - Heckmondwike and Cleckheaton	72,017	74,974	75,442	76,394	77,163	2,957	4.1%	952	1.3%	1,721	2.3%
Zone 8 - Dewsbury	61,930	64,473	64,876	65,694	66,355	2,543	4.1%	818	1.3%	1,480	2.3%
Zone 10 - Outer North and East	132,443	139,335	140,768	143,831	146,645	6,892	5.2%	3,064	2.2%	5,878	4.2%
Total (Study Area)	**309,739**	**323,912**	**326,497**	**331,903**	**336,610**	**14,173**	**4.6%**	**5,407**	**1.7%**	**10,114**	**3.1%**

Notes:

1. Estimate of population within each zone at 2011 sourced from Experian Software
2. Population of each zone projected forward over the period 2011-2031 using ONS 2018-based Sub-National Projections and Mid-Year Estimates and Mid-Year Estimates

Table 2: Available Convenience Goods Expenditure Per Capita 2021-2031 (2019 prices)

	2019	2021	2026	2031	Growth 2019-2021	Growth 2021-2026	Growth 2021-2031
					%	%	%
Zone 9 - Birstall and Batley (Primary Catchment Area)	1824	1831	1818	1813	0.4%	-0.7%	-1.0%
Zone 4 - Heckmondwike and Cleckheaton	2031	2039	2024	2019	0.4%	-0.7%	-1.0%
Zone 8 - Dewsbury	1787	1794	1780	1776	0.4%	-0.8%	-1.0%
Zone 10 - Outer North and East	2081	2089	2073	2068	0.4%	-0.8%	-1.0%

Notes:

1. Base convenience goods expenditure per capita at 2019 sourced from Experian Software (in 2019 prices)
2. Deduction made to reflect Special Forms of Trading (SFT) (Experian Briefing Note 18.0 October 2020)
3. Base expenditure projected forward on the Experian's forecast annual growth rates (Experian Briefing Note 18.0 October 2020)

Table 3 : Total Convenience Goods Expenditure Per Capita 2021 - 2031 (2019 prices)

Retail Expenditure Type	2019	2021	2026	2031	Growth 2019-2021	Growth 2021-2026	Growth 2021-2031
					%	%	%
Zone 9 - Birstall and Batley (Primary Catchment Area)	82.315	83.147	83.598	84.208	1.0%	0.5%	1.3%
Zone 4 - Heckmondwike and Cleckheaton	152.273	153.827	154.622	155.792	1.0%	0.5%	1.3%
Zone 8 - Dewsbury	115.213	116.387	116.935	117.847	1.0%	0.5%	1.3%
Zone 10 - Outer North and East	289.957	294.064	298.162	303.263	1.4%	1.4%	3.1%
Total (Study Area)	**639.758**	**647.425**	**653.318**	**661.109**	**1.2%**	**0.9%**	**2.1%**

Notes:

1. Total available expenditure is the product of applying population forecasts in Table 1 to expenditure per capita forecasts set out in Table 1

Table 4: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2021 (2019 prices)

Centre/Location	Floorspace (sqm)	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Birstall District Centre	628	6.5%	5.405	0.1%	0.564	0.9%	5.969	0.663	6.632	10561
Tesco Extra, Bradford Road, Batley Town Centre	4627	35.0%	29.102	5.8%	32.728	9.6%	61.830	6.870	68.700	14846
Aldi, Branch Road, Batley Town Centre	625	4.4%	3.658	1.2%	6.771	1.6%	10.430	1.159	11.589	18548
Other Shops, Batley Town Centre	1973	6.1%	5.072	0.3%	1.693	1.0%	6.765	0.752	7.516	3810
M&S Simply Food, Birstall Shopping Park	799	1.6%	1.330	0.2%	1.129	0.4%	2.459	0.820	3.279	4104
Sub-Total (Primary Catchment Area)	***8,652***	***53.6%***	***44.567***	***7.6%***	***42.885***	***13.5%***	***87.452***	***10.263***	***97.715***	
Morrisons, Union Street, Heckmondwike	2,770	7.7%	6.402	12.5%	70.535	11.9%	76.937	8.549	85.486	30862
Lidl, Northgate, Heckmondwike	730	0.9%	0.748	0.7%	3.950	0.7%	4.698	0.522	5.220	7155
Asda, Mill Street West, Dewsbury	2,653	5.8%	4.823	10.2%	57.556	9.6%	62.379	6.931	69.310	26123
Sainsbury's, Goods Lane, Dewsbury	2,176	5.0%	4.157	4.2%	23.700	4.3%	27.857	3.095	30.952	14223
Lidl, Commercial Road, Dewsbury	1,025	0.0%	0.000	0.4%	2.257	0.3%	2.257	0.251	2.508	2447
Asda, Howley Park Road, Morley	3,740	14.0%	11.641	12.8%	72.228	13.0%	83.868	14.800	98.668	26379
Morrisons, Windsor Court, Morley	2,449	4.7%	3.908	7.3%	41.192	7.0%	45.100	7.959	53.059	21669
Other Stores (Zones 4, 8 & 10)		1.5%	1.247	17.7%	99.877	15.6%	101.124	11.236	112.360	
Sub-Total (Zones 4, 8 & 10)		***39.6%***	***32.926***	***65.8%***	***371.295***	***62.4%***	***404.221***			
Other Stores (Beyond the Study Area)		***6.8%***	***5.654***	***26.6%***	***150.098***	***24.1%***	***155.752***			
Total		**100.0%**	**83.147**	**100.0%**	**564.278**	**100.0%**	**647.425**			

Notes

1. Expenditure flows based on Kirklees Retail Study Update 2017
2. Total convenience goods expenditure within the Study Area at 2021 sourced from Table 3
3. Net convenience goods floorspace based on ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 5: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2026 (2019 prices)

Centre/Location	Floorspace (sqm)	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Birstall District Centre	628	6.5%	5.434	0.1%	0.570	0.9%	6.004	0.667	6.671	10622
Tesco Extra, Bradford Road, Batley Town Centre	4627	35.0%	29.259	5.8%	33.044	9.5%	62.303	3.279	65.582	14173
Aldi, Branch Road, Batley Town Centre	625	4.4%	3.678	1.2%	6.837	1.6%	10.515	1.168	11.683	18699
Other Shops, Batley Town Centre	1973	6.1%	5.100	0.3%	1.709	1.0%	6.809	0.757	7.565	3834
M&S Simply Food, Birstall Shopping Park	799	1.6%	1.338	0.2%	1.139	0.4%	2.477	0.826	3.303	4134
Sub-Total (Primary Catchment Area)	***8,652***	***53.6%***	***44.809***	***7.6%***	***43.299***	***13.5%***	***88.107***	***6.697***	***94.804***	
Morrisons, Union Street, Heckmondwike	2,770	7.7%	6.437	12.5%	71.215	11.9%	77.652	8.628	86.280	31149
Lidl, Northgate, Heckmondwike	730	0.9%	0.752	0.7%	3.988	0.7%	4.740	0.527	5.267	7219
Asda, Mill Street West, Dewsbury	2,653	5.8%	4.849	10.2%	58.111	9.6%	62.960	6.996	69.956	26367
Sainsbury's, Goods Lane, Dewsbury	2,176	5.0%	4.180	4.2%	23.928	4.3%	28.108	3.123	31.231	14351
Lidl, Commercial Road, Dewsbury	1,025	0.0%	0.000	0.4%	2.279	0.3%	2.279	0.253	2.532	2471
Asda, Howley Park Road, Morley	3,740	14.0%	11.704	12.8%	72.924	13.0%	84.628	14.934	99.562	26618
Morrisons, Windsor Court, Morley	2,449	4.7%	3.929	7.3%	41.590	7.0%	45.519	8.033	53.551	21870
Other Stores (Zones 4, 8 & 10)		1.5%	1.254	17.7%	100.840	15.6%	102.094	11.344	113.438	
Sub-Total (Zones 4, 8 & 10)		***39.6%***	***33.105***	***65.8%***	***374.875***	***62.4%***	***407.980***			
Other Stores (Beyond the Study Area)		***6.8%***	***5.685***	***26.6%***	***151.545***	***24.1%***	***157.230***			
Total		**100.0%**	**83.598**	**100.0%**	**569.720**	**100.0%**	**653.318**			

Notes

1. Expenditure flows based on Kirklees Retail Study Update 2017
2. Total convenience goods expenditure within the Study Area at 2021 sourced from Table 3
3. Net convenience goods floorspace based on ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 6 (a): Forecast Turnover of the Committed Developments in 2026 (2019 prices)

	Kenmore Caravans, Mirfield	Blakeridge Mills, Batley	Total
Gross Floorspace (sqm)	1,837	2,323	4,160
Net Floorspace (all goods) (sqm)	1,254	1,858	3,112
Net Floorspace (convenience goods) (sqm)	1,003	372	1,375
Turnover to Floorspace ratio	11,143	4,526	
Total Turnover £m	**11.179**	**1.682**	**12.861**

Table 6 (b): Forecast Trade Draw of the Committed Developments in 2026 (2019 prices)

	Kenmore Caravans, Mirfield			Blakeridge Mills, Batley			Total		
	Trade Drawn (%)	Trade Drawn (£m)	Penetration Rate (%)	Trade Drawn (%)	Trade Drawn (£m)	Penetration Rate (%)	Trade Drawn (%)	Trade Drawn (£m)	Penetration Rate (%)
Zone 9 - Birstall and Batley (PCA)	2.5%	0.279	0.3%	60.0%	1.009	1.2%	10.0%	1.289	1.5%
Other Zones	87.5%	9.781	1.7%	30.0%	0.505	0.1%	80.0%	10.286	1.8%
Beyond the Study Area	10.0%	1.118		10.0%	0.168		10.0%	1.286	
Total	**100.0%**	**11.179**		**100.0%**	**1.682**		**100.0%**	**12.861**	

Notes

1. Gross and net floorspace details sourced from Planning and Retail Statements prepared to accompany applications
2. Assumes that 80% and 20% respectively of net area for Kenmore Caravans and Blakeridge Mills developments will be used for the sale of convenience goods
3. Turnover to floorspace ratios based on company averages of Aldi and B&M respectively, sourced from Global Data,
and allowing for convenience/comparison goods split (for Kenmore Caravans site) and VAT
4. Proportions of trade drawn from within and beyond PCA based on scale, nature and accessibility of existing and proposed provision

Table 7: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2026 - with Committed Developments (2019 prices)

Centre/Location	Floorspace (sqm)	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Committed Developments	**1,375**	**1.5%**	**1.289**	**1.8%**	**10.286**	**1.8%**	**11.575**	**1.286**	**12.861**	**9354**
Birstall District Centre	628	6.5%	5.417	0.1%	0.569	0.9%	5.986	0.666	6.652	10592
Tesco Extra, Bradford Road, Batley Town Centre	4627	34.5%	28.835	5.8%	32.766	9.4%	61.602	3.252	64.854	14015
Aldi, Branch Road, Batley Town Centre	625	4.3%	3.574	1.2%	6.725	1.6%	10.299	1.149	11.448	18323
Other Shops, Batley Town Centre	1973	6.1%	5.078	0.3%	1.705	1.0%	6.783	0.755	7.538	3820
M&S Simply Food, Birstall Shopping Park	799	1.6%	1.330	0.2%	1.136	0.4%	2.466	0.823	3.289	4116
Sub-Total (Primary Catchment Area)	***10,027***	***54.5%***	***45.524***	***9.3%***	***53.187***	***15.1%***	***98.710***	***7.931***	***106.641***	
Morrisons, Union Street, Heckmondwike	2,770	7.4%	6.201	12.2%	69.706	11.6%	75.907	8.447	84.354	30454
Lidl, Northgate, Heckmondwike	730	0.9%	0.712	0.7%	3.863	0.7%	4.574	0.510	5.085	6969
Asda, Mill Street West, Dewsbury	2,653	5.7%	4.739	10.1%	57.350	9.5%	62.088	6.905	68.993	26004
Sainsbury's, Goods Lane, Dewsbury	2,176	4.9%	4.133	4.2%	23.771	4.3%	27.904	3.103	31.007	14248
Lidl, Commercial Road, Dewsbury	1,025	0.0%	0.000	0.4%	2.236	0.3%	2.236	0.248	2.484	2424
Asda, Howley Park Road, Morley	3,740	14.0%	11.673	12.8%	72.813	12.9%	84.486	14.912	99.397	26574
Morrisons, Windsor Court, Morley	2,449	4.7%	3.921	7.3%	41.539	7.0%	45.460	8.023	53.482	21842
Other Stores (Zones 4, 8 & 10)		1.4%	1.145	16.8%	95.767	14.8%	96.912	10.778	107.690	
Sub-Total (Zones 4, 8 & 10)		***38.9%***	***32.523***	***64.4%***	***367.044***	***61.2%***	***399.567***			
Other Stores (Beyond the Study Area)		***6.6%***	***5.551***	***26.2%***	***149.489***	***23.7%***	***155.041***			
Total		**100.0%**	**83.598**	**100.0%**	**569.720**	**100.0%**	**653.318**			

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed facilities
2. Total convenience goods expenditure within the Study Area at 2026 sourced from Table 3
3. Net convenience goods floorspace based on ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 8 (a): Forecast Turnover of the Proposed Development in 2026 (2019 prices)

	Lidl	Home Bargains	Total
Gross Floorspace (sqm)	2,231	2,280	4,511
Net Floorspace (all goods) (sqm)	1,414	2,014	3,428
Net Floorspace (convenience goods) (sqm)	1,131	906	2,038
Turnover to Floorspace ratio	11,386	4,205	
Total Turnover £m	**12.880**	**3.811**	**16.691**

Table 8 (b): Forecast Trade Draw of the Proposed Lidl Foodstore in 2026 (2019 prices)

	Lidl			Home Bargains			Total		
	Trade Drawn (%)	**Trade Drawn (£m)**	**Penetration Rate (%)**	**Trade Drawn (%)**	**Trade Drawn (£m)**	**Penetration Rate (%)**	**Trade Drawn (%)**	**Trade drawn (£m)**	**Penetration Rate (%)**
Zone 9 - Birstall and Batley (PCA)	50.0%	6.440	7.7%	40.0%	1.524	1.8%	47.7%	7.964	9.5%
Other Zones	35.0%	4.508	0.8%	40.0%	1.524	0.3%	36.1%	6.032	1.1%
Beyond the Study Area	15.0%	1.932		20.0%	0.762		16.1%	2.694	
Total	**100.0%**	**12.880**		**100.0%**	**3.811**		**100.0%**	**16.691**	

Notes

1. Gross and net floorspace details sourced from Lidl and Home Bargains
2. Assumes that 80% and 45% of net area will be used for the sale of convenience goods for Lidl and Home Bargains respectively
3. Turnover to floorspace ratios sourced from Global Data, allowing for convenience/comparison goods split and VAT
4. Proportions of trade drawn from within and beyond PCA based on scale, nature and accessibility of existing and proposed provision

Table 9: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2026 - with Committed Aldi and Proposed Lidl Stores (2019 prices)

Centre/Location	Floorspace (sqm)	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Proposed Development	**1,131**	**9.5%**	**7.964**	**1.1%**	**6.032**	**2.1%**	**13.997**	**2.694**	**16.691**	**14755**
Committed Developments	**1,003**	**1.3%**	**1.122**	**1.8%**	**10.155**	**1.7%**	**11.277**	**1.255**	**12.532**	**12492**
Birstall District Centre	628	6.2%	5.176	0.1%	0.566	0.9%	5.743	0.660	6.403	10196
Tesco Extra, Bradford Road, Batley Town Cen	4627	31.5%	26.294	5.7%	32.484	9.0%	58.777	3.198	61.976	13393
Aldi, Branch Road, Batley Town Centre	625	3.5%	2.921	1.2%	6.604	1.5%	9.525	1.110	10.635	17022
Other Shops, Batley Town Centre	1973	5.7%	4.800	0.3%	1.696	1.0%	6.495	0.747	7.242	3671
M&S Simply Food, Birstall Shopping Park	799	1.5%	1.239	0.2%	1.128	0.4%	2.367	0.812	3.180	3980
Sub-Total (Primary Catchment Area)	***10,787***	***59.2%***	***49.516***	***10.3%***	***58.666***	***16.6%***	***108.181***	***10.477***	***118.659***	
Morrisons, Union Street, Heckmondwike	2,770	6.5%	5.393	12.1%	68.816	11.4%	74.210	8.241	82.451	29767
Lidl, Northgate, Heckmondwike	730	0.5%	0.408	0.6%	3.701	0.6%	4.110	0.470	4.579	6277
Asda, Mill Street West, Dewsbury	2,653	5.0%	4.219	10.0%	56.733	9.3%	60.953	6.763	67.716	25522
Sainsbury's, Goods Lane, Dewsbury	2,176	4.6%	3.830	4.1%	23.601	4.2%	27.432	3.060	30.492	14012
Lidl, Commercial Road, Dewsbury	1,025	0.0%	0.000	0.4%	2.142	0.3%	2.142	0.229	2.371	2314
Asda, Howley Park Road, Morley	3,740	12.6%	10.524	12.7%	72.110	12.6%	82.634	14.638	97.272	26006
Morrisons, Windsor Court, Morley	2,449	4.2%	3.544	7.2%	41.148	6.8%	44.692	7.879	52.571	21470
Other Stores (Zones 4, 8 & 10)		1.1%	0.956	16.5%	94.218	14.6%	95.174	10.445	105.620	
Sub-Total (Zones 4, 8 & 10)		**34.5%**	**28.875**	**63.6%**	**362.471**	**59.9%**	**391.346**			
Other Stores (Beyond the Study Area)		**6.2%**	**5.208**	**26.1%**	**148.583**	**23.5%**	**153.790**			
Total		**100.0%**	**83.598**	**100.0%**	**569.720**	**100.0%**	**653.318**			

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed facilities
2. Total convenience goods expenditure within the Study Area at 2026 sourced from Table 3
3. Net convenience goods floorspace based on ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 10: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2031 - with Committed Aldi and Proposed Lidl Stores (2019 prices)

Centre/Location	Floorspace (sqm)	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Proposed Development	**1,131**	**9.5%**	**8.022**	**1.1%**	**6.032**	**2.1%**	**14.055**	**2.705**	**16.760**	**14816**
Committed Developments	**1,003**	**1.3%**	**1.130**	**1.8%**	**10.155**	**1.7%**	**11.285**	**1.256**	**12.541**	**12501**
Birstall District Centre	628	6.2%	5.214	0.1%	0.566	0.9%	5.780	0.665	6.445	10263
Tesco Extra, Bradford Road, Batley Town Centre	4627	31.5%	26.485	5.7%	32.484	9.0%	58.969	3.209	62.178	13437
Aldi, Branch Road, Batley Town Centre	625	3.5%	2.942	1.2%	6.604	1.5%	9.546	1.113	10.659	17060
Other Shops, Batley Town Centre	1973	5.7%	4.835	0.3%	1.696	1.0%	6.530	0.751	7.281	3690
M&S Simply Food, Birstall Shopping Park	799	1.5%	1.248	0.2%	1.128	0.4%	2.376	0.816	3.192	3995
Sub-Total (Primary Catchment Area)	***9,655***	***59.2%***	***49.876***	***10.3%***	***58.666***	***16.6%***	***108.542***	***10.514***	***119.056***	
Morrisons, Union Street, Heckmondwike	2,770	6.5%	5.433	12.1%	68.816	11.4%	74.249	8.246	82.494	29782
Lidl, Northgate, Heckmondwike	730	0.5%	0.411	0.6%	3.701	0.6%	4.113	0.470	4.583	6281
Asda, Mill Street West, Dewsbury	2,653	5.0%	4.250	10.0%	56.733	9.3%	60.983	6.767	67.750	25535
Sainsbury's, Goods Lane, Dewsbury	2,176	4.6%	3.858	4.1%	23.601	4.2%	27.459	3.064	30.523	14026
Lidl, Commercial Road, Dewsbury	1,025	0.0%	0.000	0.4%	2.142	0.3%	2.142	0.229	2.371	2314
Asda, Howley Park Road, Morley	3,740	12.6%	10.600	12.7%	72.110	12.6%	82.711	14.651	97.362	26030
Morrisons, Windsor Court, Morley	2,449	4.2%	3.570	7.2%	41.148	6.8%	44.718	7.884	52.601	21482
Other Stores (Zones 4, 8 & 10)		1.1%	0.963	16.5%	94.218	14.6%	95.181	10.446	105.628	
Sub-Total (Zones 4, 8 & 10)		**34.5%**	**29.085**	**63.6%**	**362.471**	**59.9%**	**391.556**			
Other Stores (Beyond the Study Area)		**6.2%**	**5.246**	**26.1%**	**148.583**	**100.0%**	**153.828**			
Total		**100.0%**	**84.208**	**100.0%**	**569.720**	**100.0%**	**653.927**			

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed facilities
2. Total convenience goods expenditure within the Study Area at 2031 sourced from Table 3
3. Net convenience goods floorspace based on ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 11: Summary of Convenience Goods Turnovers and Trade Diversions within the Primary Catchment Area (2019 prices)

Centre/Location	Floorspace (sqm)	Turnover in 2026 - No New Development		Trade Diversion to Committed Developments		Turnover in 2026 - With Committed Developments		Trade Diversion to Proposed Development		Turnover in 2026 - With Proposed Development		Cumulative Trade Diversion		Turnover in 2031 - With Proposed Development	
		£m	£ per sqm	£m	%	£m	£ per sqm	£m	%	£m	£ per sqm	£m	%	£m	£ per sqm
Proposed Development	**1,131**									**16.691**	**14,755**			**16.760**	**14,816**
Committed Developments	**1,003**					**12.861**	**9,354**	**0.329**	**2.6%**	**12.532**	**12,492**			**12.541**	**12,501**
Birstall District Centre	628	6.671	10622	0.019	0.3%	6.652	10,592	0.249	3.7%	6.403	10,196	0.268	4.0%	6.445	10,263
Tesco Extra, Bradford Road, Batley Town Centre	4,627	65.582	14173	0.729	1.1%	64.854	14,015	2.878	4.4%	61.976	13,393	3.607	5.5%	62.178	13,437
Aldi, Branch Road, Batley Town Centre	625	11.683	18699	0.235	2.0%	11.448	18,323	0.813	7.1%	10.635	17,022	1.048	9.0%	10.659	17,060
Other Shops, Batley Town Centre	1,973	7.565	3834	0.028	0.4%	7.538	3,820	0.295	3.9%	7.242	3,671	0.323	4.3%	7.281	3,690
M&S Simply Food, Birstall Shopping Park	799	3.303	4134	0.014	0.4%	3.289	4,116	0.109	3.3%	3.180	3,980	0.123	3.7%	3.192	3,995
Sub-Total (Primary Catchment Area)	***10,787***	***94.804***		***1.024***		***106.641***		***4.673***		***118.659***		***5.368***		***119.056***	
Morrisons, Union Street, Heckmondwike	2,770	86.280	31149	1.926	2.2%	84.354	30,454	1.903	2.3%	82.451	29,767	3.829	4.4%	82.494	29,782
Lidl, Northgate, Heckmondwike	730	5.267	7219	0.182	3.5%	5.085	6,969	0.505	9.9%	4.579	6,277	0.688	13.1%	4.583	6,281
Asda, Mill Street West, Dewsbury	2,653	69.956	26367	0.963	1.4%	68.993	26,004	1.277	1.9%	67.716	25,522	2.240	3.2%	67.750	25,535
Sainsbury's, Goods Lane, Dewsbury	2,176	31.231	14351	0.225	0.7%	31.007	14,248	0.515	1.7%	30.492	14,012	0.739	2.4%	30.523	14,026
Lidl, Commercial Road, Dewsbury	1,025	2.532	2471	0.048	1.9%	2.484	2,424	0.113	4.6%	2.371	2,314	0.161	6.4%	2.371	2,314
Asda, Howley Park Road, Morley	3,740	99.562	26618	0.165	0.2%	99.397	26,574	2.126	2.1%	97.272	26,006	2.290	2.3%	97.362	26,030
Morrisons, Windsor Court, Morley	2,449	53.551	21870	0.069	0.1%	53.482	21,842	0.912	1.7%	52.571	21,470	0.981	1.8%	52.601	21,482
Other Stores (Zones 4, 8 & 10)		113.438		5.749	5.1%	107.690		2.070	1.9%	105.620		7.818	6.9%	105.628	
Sub-Total (Study Area)		***556.622***		***10.350***		***559.133***		***14.094***		***561.730***		***24.115***		***562.368***	
Other Stores (Beyond the Study Area)				2.511				2.597				5.108			
Total				**12.861**				**16.691**				**29.552**			

Notes

1. Convenience goods turnovers in 2026 (No New Development) sourced from Table 5
2. Convenience goods turnovers in 2026 (With Committed Developments) sourced from Table 7
3. Convenience goods turnovers in 2026 (With Committed and Proposed Developments) sourced from Table 9
4. Convenience goods turnovers in 2031 (With Committed and Proposed Developments) sourced from Table 10
5. Other Stores (Zone 4, 8 & 10) include Tesco (Cleckheaton), Sainsbury's Local (Staincliffe), Lidl (Mirfield), Home Bargains (Dewsbury, Morley and Cleckheaton) and B&M (Morley and Dewsbury) amongst others
6. Other Stores (Beyond the Study Area) include Aldi (Gallagher Retail Park and Beck Road), Asda (Owlcotes Centre, Sandal and Rooley Lane), Sainsbury's (Southgate, Ings Road and White Rose Centre), Tesco (Brighouse), Morrisons (Waterloo and Dewsbury Road) and Lidl (Wakefield Road), amongst others

Appendix 4: Comparison Goods Impact Assessment

PROPOSED LIDL FOODSTORE, BANKWOOD WAY, BIRSTALL

COMPARISON GOODS RETAIL IMPACT ASSESSMENT

Table 1: Population of Study Area

Zone	2011	2019	2021	2026	2031	Growth 2019-2021		Growth 2021-2026		Growth 2021-2031	
						Persons	%	Persons	%	Persons	%
Zone 9 - Birstall and Batley (Primary Catchment Area)	43,349	45,129	45,411	45,984	46,447	1,780	4.1%	573	1.3%	1,036	2.3%
Zone 4 - Heckmondwike and Cleckheaton	72,017	74,974	75,442	76,394	77,163	2,957	4.1%	952	1.3%	1,721	2.3%
Zone 8 - Dewsbury	61,930	64,473	64,876	65,694	66,355	2,543	4.1%	818	1.3%	1,480	2.3%
Zone 10 - Outer North and East	132,443	139,335	140,768	143,831	146,645	6,892	5.2%	3,064	2.2%	5,878	4.2%
Total (Study Area)	**309,739**	**323,912**	**326,497**	**331,903**	**336,610**	**14,173**	**4.6%**	**5,407**	**1.7%**	**10,114**	**3.1%**

Notes:

1. Estimate of population within each zone at 2011 sourced from Experian Software
2. Population of each zone projected forward over the period 2011-2031 using ONS 2018-based Sub-National Projections and Mid-Year Estimates and Mid-Year Estimates

Table 2: Available Comparison Goods Expenditure Per Capita 2021-2031 (2019 prices)

	2019	2021	2026	2031	Growth 2019-2021	Growth 2021-2026	Growth 2021-2031
					%	%	%
Zone 9 - Birstall and Batley (Primary Catchment Area)	2359	2179	2435	2736	-7.6%	11.7%	25.6%
Zone 4 - Heckmondwike and Cleckheaton	2901	2679	2994	3365	-7.7%	11.8%	25.6%
Zone 8 - Dewsbury	2246	2075	2319	2606	-7.6%	11.8%	25.6%
Zone 10 - Outer North and East	2949	2724	3044	3422	-7.6%	11.7%	25.6%

Notes:

1. Base comparison goods expenditure per capita at 2019 sourced from Experian Software (in 2019 prices)
2. Deduction made to reflect Special Forms of Trading (SFT) (Experian Briefing Note 18.0 October 2020)
3. Base expenditure projected forward on the Experian's forecast annual growth rates (Experian Briefing Note 18.0 October 2020)

Table 3 : Total Comparison Goods Expenditure Per Capita 2021 - 2031 (2019 prices)

Retail Expenditure Type	2019	2021	2026	2031	Growth 2019-2021	Growth 2021-2026	Growth 2021-2031
					%	%	%
Zone 9 - Birstall and Batley (Primary Catchment Area)	106.459	98.950	111.970	127.078	-7.1%	13.2%	28.4%
Zone 4 - Heckmondwike and Cleckheaton	217.500	202.110	228.724	259.654	-7.1%	13.2%	28.5%
Zone 8 - Dewsbury	144.806	134.617	152.344	172.922	-7.0%	13.2%	28.5%
Zone 10 - Outer North and East	410.900	383.452	437.823	501.821	-6.7%	14.2%	30.9%
Total (Study Area)	**879.666**	**819.129**	**930.862**	**1,061.474**	**-6.9%**	**13.6%**	**29.6%**

Notes:

1. Total available expenditure is the product of applying population forecasts in Table 1 to expenditure per capita forecasts set out in Table 1

Table 4: Comparison Goods Market Shares and Expenditure Flows within the Study Area in 2021 (2019 prices)

Centre/Location	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)
Primary Catchment Area								
Birstall District Centre	4.9%	4.849	2.1%	15.124	2.4%	19.972	2.219	22.191
Batley Town Centre	20.1%	19.889	2.8%	20.165	4.9%	40.054	4.450	44.504
Birstall Shopping Park	22.9%	22.660	16.6%	119.550	17.4%	142.209	60.947	203.156
Mill Discount Village, Batley	0.7%	0.693	1.0%	7.202	1.0%	7.894	0.877	8.772
Other Shops, Zone 9	0.9%	0.891	0.9%	6.482	0.9%	7.372	0.819	8.191
Sub-Total (Primary Catchment Area)	***49.5%***	***48.980***	***23.4%***	***168.522***	***26.6%***	***217.502***	***69.313***	***286.815***
Cleckheaton Town Centre	0.1%	0.099	2.2%	15.844	1.9%	15.943	1.771	17.714
Heckmondwike Town Centre	1.0%	0.990	2.2%	15.844	2.1%	16.833	1.870	18.704
Dewsbury Town Centre	13.2%	13.061	11.5%	82.821	11.7%	95.882	10.654	106.536
Mirfield District Centre	0.0%	0.000	0.9%	6.482	0.8%	6.482	0.720	7.202
Morley Town Centre	1.4%	1.385	2.7%	19.445	2.5%	20.830	2.314	23.145
Asda, Howley Park Road, Morley	5.1%	5.046	2.6%	18.725	2.9%	23.771	4.195	27.966
Other Stores (Zones 4, 8 & 10)	1.0%	0.990	4.3%	30.968	3.9%	31.957	3.551	35.508
Sub-Total (Zones 4, 8 & 10)	***21.8%***	***21.571***	***26.4%***	***190.127***	***25.8%***	***211.698***		
Other Stores (Beyond the Study Area)	***28.7%***	***28.399***	***50.2%***	***361.530***	**47.6%**	***389.928***		
Total	**100.0%**	**98.950**	**100.0%**	**720.179**	**100.0%**	**819.129**		

Notes

1. Expenditure flows based on Kirklees Retail Study Update 2018
2. Total comparison goods expenditure within the Study Area at 2021 sourced from Table 4

Table 5: Comparison Goods Market Shares and Expenditure Flows within the Study Area in 2026 (2019 prices)

Centre/Location	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)
Primary Catchment Area								
Birstall District Centre	4.9%	5.487	2.1%	17.197	2.4%	22.683	2.520	25.204
Batley Town Centre	20.1%	22.506	2.8%	22.929	4.9%	45.435	5.048	50.483
Birstall Shopping Park	22.9%	25.641	16.6%	135.936	17.4%	161.577	69.247	230.824
Mill Discount Village, Batley	0.7%	0.784	1.0%	8.189	1.0%	8.973	0.997	9.970
Other Shops, Zone 9	0.9%	1.008	0.9%	7.370	0.9%	8.378	0.931	9.309
Sub-Total (Primary Catchment Area)	***49.5%***	***55.425***	***23.4%***	***191.621***	***26.5%***	***247.046***	***78.744***	***325.790***
Cleckheaton Town Centre	0.1%	0.112	2.2%	18.016	1.9%	18.128	2.014	20.142
Heckmondwike Town Centre	1.0%	1.120	2.2%	18.016	2.1%	19.135	2.126	21.261
Dewsbury Town Centre	13.2%	14.780	11.5%	94.172	11.7%	108.953	12.106	121.058
Mirfield District Centre	0.0%	0.000	0.9%	7.370	0.8%	7.370	0.819	8.189
Morley Town Centre	1.4%	1.568	2.7%	22.110	2.5%	23.678	2.631	26.308
Asda, Howley Park Road, Morley	5.1%	5.710	2.6%	21.291	2.9%	27.002	4.765	31.767
Other Stores (Zones 4, 8 & 10)	1.0%	1.120	4.3%	35.212	3.9%	36.332	4.037	40.369
Sub-Total (Zones 4, 8 & 10)	***21.8%***	***24.410***	***26.4%***	***216.187***	***25.8%***	***240.597***		
Other Stores (Beyond the Study Area)	***28.7%***	***32.135***	***50.2%***	***411.083***	***47.6%***	***443.219***		
Total	**100.0%**	**111.970**	**100.0%**	**818.891**	**100.0%**	**930.862**		

Notes

1. Expenditure flows based on Kirklees Retail Study Update 2018
2. Total comparison goods expenditure within the Study Area at 2021 sourced from Table 4

Table 6 (a): Forecast Turnover of the Committed Developments in 2026 (2019 prices)

	Kenmore Caravans, Mirfield	Blakeridge Mills, Batley	Total
Gross Floorspace (sqm)	1,837	2,323	4,160
Net Floorspace (all goods) (sqm)	1,254	1,858	3,112
Net Floorspace (comparison goods) (sqm)	251	1,487	1,738
Turnover to Floorspace ratio	7,555	4,526	
Total Turnover £m	**1.895**	**6.729**	**8.624**

Table 6 (b): Forecast Trade Draw of the Committed Developments in 2026 (2019 prices)

	Kenmore Caravans, Mirfield			Blakeridge Mills, Batley			Total		
	Trade Drawn (%)	Trade Drawn (£m)	Penetration Rate (%)	Trade Drawn (%)	Trade Drawn (£m)	Penetration Rate (%)	Trade Drawn (%)	Trade Drawn (£m)	Penetration Rate (%)
Zone 9 - Birstall and Batley (PCA)	2.5%	0.047	0.0%	60.0%	4.037	3.6%	47.4%	4.085	3.6%
Other Zones	87.5%	1.658	0.2%	30.0%	2.019	0.2%	42.6%	3.677	0.4%
Beyond the Study Area	10.0%	0.189		10.0%	0.673		10.0%	0.862	
Total	**100.0%**	**1.895**		**100.0%**	**6.729**		**100.0%**	**8.624**	

Notes

1. Gross and net floorspace details sourced from Planning and Retail Statements prepared to accompany applications
2. Assumes that 20% and 80% of net area for Kenmore Caravans and Blakeridge Mills developments respectively will be used for the sale of comparison goods
3. Turnover to floorspace ratios based on company averages of Aldi and B&M respectively, sourced from Global Data,
and allowing for convenience/comparison goods split (for Kenmore Caravans site) and VAT
4. Proportions of trade drawn from within and beyond PCA based on scale, nature and accessibility of existing and proposed provision

Table 7: Comparison Goods Market Shares and Expenditure Flows within the Study Area in 2026 - with Committed Developments (2019 prices)

Centre/Location	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)
Primary Catchment Area								
Committed Developments	**3.6%**	**4.085**	**0.4%**	**3.677**	**0.8%**	**7.761**	**0.862**	**8.624**
Birstall District Centre	4.9%	5.457	2.1%	17.185	2.4%	22.642	2.518	25.160
Batley Town Centre	19.2%	21.527	2.8%	22.804	4.8%	44.331	5.012	49.343
Birstall Shopping Park	22.0%	24.634	16.5%	135.268	17.2%	159.903	68.798	228.700
Mill Discount Village, Batley	0.7%	0.753	1.0%	8.149	1.0%	8.902	0.990	9.892
Other Shops, Zone 9	0.9%	1.002	0.9%	7.365	0.9%	8.367	0.930	9.297
Sub-Total (Primary Catchment Area)	***51.3%***	***57.458***	***23.7%***	***194.448***	***27.1%***	***251.906***	***79.111***	***331.017***
Cleckheaton Town Centre	0.1%	0.109	2.2%	17.956	1.9%	18.065	2.005	20.070
Heckmondwike Town Centre	1.0%	1.083	2.2%	17.941	2.0%	19.023	2.114	21.138
Dewsbury Town Centre	12.7%	14.245	11.4%	93.746	11.6%	107.990	12.033	120.024
Mirfield District Centre	0.0%	0.000	0.9%	7.342	0.8%	7.342	0.815	8.156
Morley Town Centre	1.4%	1.513	2.7%	22.013	2.5%	23.526	2.616	26.141
Asda, Howley Park Road, Morley	5.0%	5.559	2.6%	21.220	2.9%	26.779	4.744	31.523
Other Stores (Zones 4, 8 & 10)	1.0%	1.089	4.3%	35.093	3.9%	36.182	4.019	40.201
Sub-Total (Zones 4, 8 & 10)	***21.1%***	***23.597***	***26.3%***	***215.311***	***25.7%***	***238.908***		
Other Stores (Beyond the Study Area)	***27.6%***	***30.916***	***50.0%***	***409.132***	***47.3%***	***440.048***		
Total	**100.0%**	**111.970**	**100.0%**	**818.891**	**100.0%**	**930.862**		

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed facilities
2. Total comparison goods expenditure within the Study Area at 2026 sourced from Table 4

Table 8 (a): Forecast Turnover of the Proposed Development in 2026 (2019 prices)

	Lidl	Home Bargains	Total
Gross Floorspace (sqm)	2,231	2,280	4,511
Net Floorspace (all goods) (sqm)	1,414	2,014	3,428
Net Floorspace (comparison goods) (sqm)	283	1,108	1,391
Turnover to Floorspace ratio	6,603	4,205	
Total Turnover £m	**1.867**	**4.658**	**6.525**

Table 8 (b): Forecast Trade Draw of the Proposed Lidl Foodstore in 2026 (2019 prices)

	Lidl			Home Bargains			Total		
	Trade Drawn (%)	Trade Drawn (£m)	Penetration Rate (%)	Trade Drawn (%)	Trade Drawn (£m)	Penetration Rate (%)	Trade Drawn (%)	Trade drawn (£m)	Penetration Rate (%)
Zone 9 - Birstall and Batley (PCA)	50.0%	0.934	0.8%	40.0%	1.863	1.7%	42.9%	2.797	2.5%
Other Zones	35.0%	0.654	0.1%	40.0%	1.863	0.2%	38.6%	2.517	0.3%
Beyond the Study Area	15.0%	0.280		20.0%	0.932		18.6%	1.212	
Total	**100.0%**	**1.867**		**100.0%**	**4.658**		**100.0%**	**6.525**	

Notes

1. Gross and net floorspace details sourced from Lidl and Home Bargains
2. Assumes that 20% and 55% of net area will be used for the sale of convenience goods for Lidl and Home Bargains respectively
3. Turnover to floorspace ratios sourced from Global Data, allowing for convenience/comparison goods split and VAT
4. Proportions of trade drawn from within and beyond PCA based on scale, nature and accessibility of existing and proposed provision

Table 9: Comparison Goods Market Shares and Expenditure Flows within the Study Area in 2026 - with Committed Aldi and Proposed Lidl Stores (2019 prices)

Centre/Location	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)
Primary Catchment Area								
Proposed Development	**2.5%**	**2.797**	**0.3%**	**2.517**	**0.6%**	**5.314**	**1.212**	**6.525**
Committed Developments	**3.4%**	**3.820**	**0.4%**	**3.646**	**0.8%**	**7.466**	**0.850**	**8.316**
Birstall District Centre	4.8%	5.348	2.1%	17.141	2.4%	22.489	2.507	24.996
Batley Town Centre	18.8%	21.086	2.8%	22.744	4.7%	43.830	4.989	48.819
Birstall Shopping Park	21.5%	24.018	16.5%	134.834	17.1%	158.852	68.404	227.256
Mill Discount Village, Batley	0.7%	0.742	1.0%	8.133	1.0%	8.875	0.987	9.862
Other Shops, Zone 9	0.9%	0.994	0.9%	7.357	0.9%	8.352	0.928	9.280
Sub-Total (Primary Catchment Area)	***52.5%***	***58.805***	***24.0%***	***196.373***	***27.4%***	***255.178***	***79.876***	***335.054***
Cleckheaton Town Centre	0.1%	0.106	2.2%	17.902	1.9%	18.008	1.995	20.003
Heckmondwike Town Centre	0.9%	1.052	2.2%	17.875	2.0%	18.927	2.101	21.028
Dewsbury Town Centre	12.4%	13.888	11.4%	93.445	11.5%	107.333	11.965	119.297
Mirfield District Centre	0.0%	0.000	0.9%	7.329	0.8%	7.329	0.812	8.141
Morley Town Centre	1.3%	1.473	2.7%	21.939	2.5%	23.412	2.600	26.012
Asda, Howley Park Road, Morley	4.8%	5.401	2.6%	21.143	2.9%	26.543	4.713	31.257
Other Stores (Zones 4, 8 & 10)	1.0%	1.069	4.3%	35.008	3.9%	36.077	4.002	40.079
Sub-Total (Zones 4, 8 & 10)	**20.5%**	**22.989**	**26.2%**	**214.641**	**25.5%**	**237.630**		
Other Stores (Beyond the Study Area)	**27.0%**	**30.177**	**49.8%**	**407.877**	**47.1%**	**438.054**		
Total	**100.0%**	**111.970**	**100.0%**	**818.891**	**100.0%**	**930.862**		

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed facilities
2. Total comparison goods expenditure within the Study Area at 2026 sourced from Table 4

Table 10: Comparison Goods Market Shares and Expenditure Flows within the Study Area in 2031 - with Committed Aldi and Proposed Lidl Stores (2019 prices)

Centre/Location	Zone 9 - Birstall and Batley (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the Study Area	Total Turnover
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)
Primary Catchment Area								
Proposed Development	**2.5%**	**3.174**	**0.3%**	**2.517**	**0.6%**	**5.691**	**1.298**	**6.989**
Committed Developments	**3.4%**	**4.335**	**0.4%**	**3.646**	**0.8%**	**7.981**	**0.908**	**8.890**
Birstall District Centre	4.8%	6.070	2.1%	17.141	2.5%	23.211	2.587	25.798
Batley Town Centre	18.8%	23.931	2.8%	22.744	4.9%	46.675	5.312	51.988
Birstall Shopping Park	21.5%	27.258	16.5%	134.834	17.1%	162.092	69.800	231.892
Mill Discount Village, Batley	0.7%	0.842	1.0%	8.133	0.9%	8.975	0.998	9.973
Other Shops, Zone 9	0.9%	1.128	0.9%	7.357	0.9%	8.486	0.943	9.429
Sub-Total (Primary Catchment Area)	***52.5%***	***66.739***	***24.0%***	***196.373***	***27.8%***	***263.112***	***81.847***	***344.959***
Cleckheaton Town Centre	0.1%	0.121	2.2%	17.902	1.9%	18.023	1.996	20.019
Heckmondwike Town Centre	0.9%	1.194	2.2%	17.875	2.0%	19.069	2.116	21.185
Dewsbury Town Centre	12.4%	15.762	11.4%	93.445	11.5%	109.207	12.173	121.380
Mirfield District Centre	0.0%	0.000	0.9%	7.329	0.8%	7.329	0.812	8.141
Morley Town Centre	1.3%	1.672	2.7%	21.939	2.5%	23.611	2.622	26.233
Asda, Howley Park Road, Morley	4.8%	6.129	2.6%	21.143	2.9%	27.272	4.843	32.115
Other Stores (Zones 4, 8 & 10)	1.0%	1.213	4.3%	35.008	3.8%	36.221	4.018	40.239
Sub-Total (Zones 4, 8 & 10)	**20.5%**	**26.090**	**26.2%**	**214.641**	**25.4%**	**240.732**		
Other Stores (Beyond the Study Area)	**27.0%**	**34.248**	**49.8%**	**407.877**	**100.0%**	**442.125**		
Total	**100.0%**	**127.078**	**100.0%**	**818.891**	**100.0%**	**945.969**		

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed facilities
2. Total comparison goods expenditure within the Study Area at 2031 sourced from Table 4

Table 11: Summary of Comparison Goods Turnovers and Trade Diversions within the Primary Catchment Area (2019 prices)

Centre/Location	Turnover in 2026 - No New Development	Trade Diversion to Committed Developments		Turnover in 2026 - With Committed Developments	Trade Diversion to Proposed Development		Turnover in 2026 - With Proposed Development	Cumulative Trade Diversion		Turnover in 2031 - With Proposed Development
	£m	£m	%	£m	£m	%	£m	£m	%	£m
Proposed Development							**6.525**			**6.989**
Committed Developments				**8.624**	**0.308**	**3.6%**	**8.316**			**8.890**
Birstall District Centre	25.204	0.044	0.2%	25.160	0.164	0.7%	24.996	0.208	0.8%	25.798
Batley Town Centre	50.483	1.140	2.3%	49.343	0.524	1.1%	48.819	1.664	3.3%	51.988
Birstall Shopping Park	230.824	2.124	0.9%	228.700	1.445	0.6%	227.256	3.569	1.5%	231.892
Mill Discount Village, Batley	9.970	0.077	0.8%	9.892	0.030	0.3%	9.862	0.107	1.1%	9.973
Other Shops, Zone 9	9.309	0.011	0.1%	9.297	0.017	0.2%	9.280	0.029	0.3%	9.429
Sub-Total (Primary Catchment Area)	***325.790***	***3.397***		***331.017***	***2.488***		***335.054***	***5.577***		***344.959***
Cleckheaton Town Centre	20.142	0.072	0.4%	20.070	0.067	0.3%	20.003	0.139	0.7%	20.019
Heckmondwike Town Centre	21.261	0.124	0.6%	21.138	0.110	0.5%	21.028	0.234	1.1%	21.185
Dewsbury Town Centre	121.058	1.035	0.9%	120.024	0.727	0.6%	119.297	1.761	1.5%	121.380
Mirfield District Centre	8.189	0.032	0.4%	8.156	0.015	0.2%	8.141	0.048	0.6%	8.141
Morley Town Centre	26.308	0.167	0.6%	26.141	0.129	0.5%	26.012	0.296	1.1%	26.233
Asda, Howley Park Road, Morley	31.767	0.243	0.8%	31.523	0.267	0.8%	31.257	0.510	1.6%	32.115
Other Stores (Zones 4, 8 & 10)	40.369	0.168	0.4%	40.201	0.122	0.3%	40.079	0.290	0.7%	40.239
Sub-Total (Study Area)	***594.884***	***5.237***		***598.271***	***3.925***		***600.871***	***8.854***		***614.271***
Other Stores (Beyond the Study Area)		3.387			2.600			5.987		
Total		**8.624**			**6.525**			**15.149**		

Notes

1. Comparison goods turnovers in 2026 (No New Development) sourced from Table 6
2. Comparison goods turnovers in 2026 (With Committed Developments) sourced from Table 8
3. Comparison goods turnovers in 2026 (With Committed and Proposed Developments) sourced from Table 10
4. Comparison goods turnovers in 2031 (With Committed and Proposed Developments) sourced from Table 11

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