

SUPPLEMENTARY PLANNING GUIDANCE

SHOPPING POLICY S4: LARGE NEW STORES

APPROVELU999 MARCH 1999

FOREWORD

The nature of retailing has undergone many changes in recent years. New retail development is primarily in the form of large stores, frequently located outside town centres.

Policy S4 of the Unitary Development Plan (UDP), adopted on 1st March 1999, provides the basis on which the Council decides whether or not planning permission should be granted for large new retail developments.

This Supplementary Planning Guidance (SPG) explains how policy S4 will be applied and how it relates to national policy guidance so that prospective developers and the general public can be clear about the matters which will be relevant to the Council's consideration of proposals for large new stores.

This guidance was approved by the Council on 31 March 1999.

C Pearce Chair of Planning and Economic Development Committee.

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1 INTRODUCTION

- 1.1 Supplementary Planning Guidance (SPG) provides guidance to supplement the policies in development plans. Whilst the guidance does not have the same status as the adopted plan policy, it is a material consideration in determining planning applications and carries significant weight since it has been prepared in consultation with the public and it has been the subject of Council resolution. A statement of the consultations undertaken and the Council's response to representations is available on request.
- 1.2 The Unitary Development Plan policy S4 sets out the considerations which proposals for large new stores over 2,000 square metres gross retail floorspace will be assessed against. The purpose of this supplementary guidance is to assist those submitting such planning applications and has been prepared taking into account Planning Policy Guidance Note 6 'Town Centres and Retail Developments' (PPG6) and Planning Policy Guidance Note 13 on 'Transport' (PPG13). The guidance in this document will also be applied in certain circumstances to retail proposals which fall below 2,000 square metres gross floorspace (see paragraph 2.2).
- 1.3 The Council will assess proposals for large new stores against each of the criteria set out in the policy. The main considerations relevant to each criterion are set out below. Applicants should be prepared to show how their proposal can satisfy each criterion.
- 1.4 Developers are invited to approach the Planning Service prior to the submission of a planning application for an informal view of relevant matters. Such enquiries will normally be directed through the Council's Development Team, established to provide a corporate view on development proposals, which will make every effort to provide a rapid response.
- 1.5 Guidance on the use of planning conditions to control the nature of development for which planning permission is granted is provided in Section 5.

2 WHAT PROPOSALS DOES THE SPG APPLY TO?

- 2.1 In the context of policy S4, the Council consider a 'large new store' to be a proposal which involves a gross retail floorspace of more than 2,000 square metres. All retail proposals of this nature will be assessed against the policy and the supplementary guidance contained in this document.
- 2.2 The Council will also apply the advice in this document to retail proposals smaller than 2,000 square metres which could potentially operate beyond the local level. It is anticipated that such proposals would not normally involve a gross floorspace of less than 750 square metres. This broadly equates to a unit size which is typically representative of the retail warehouse format. Although developments of this size do not fall within the definition of `large stores' included in the UDP, the Council's intention will be to consider such retail proposals against all the considerations in policy S4 and the guidance in this document.

3 THE CRITERIA

ALL PROPOSALS FOR LARGE RETAIL DEVELOPMENTS, WHETHER WITHIN A CENTRE OR IN AN OUT OF CENTRE LOCATION WILL NEED TO BE ASSESSED AGAINST CRITERIA (i) TO (iv). CRITERIA (v) TO (vii) ARE ALSO APPLICABLE IN THE CASE OF PROPOSED DEVELOPMENTS LOCATED OUTSIDE EXISTING SHOPPING CENTRES.

(i) The likely effect on the viability and vitality of any existing town or large local centre.

- 3.1 The Council's principal concern is to establish the potential effect of new retail development on the viability and vitality of existing shopping centres in Kirklees (see Appendix 2). New retailing provision, and especially that which widens choice for the consumer, which will not seriously threaten vitality and viability will be acceptable. However, retail development that would result in a level of trading impact likely to adversely affect the vitality and viability of a shopping centre, and hence be to the detriment of those sections of the community who depend upon the retail facilities and other services it provides, will be refused.
- 3.2 The potential for serious adverse impact on a centre's vitality and viability is determined by assessing in both quantitative and qualitative terms, the changes in shopping patterns that are likely to occur as a result of new retail development.
- 3.3 In order to better understand the function and performance of town centres within Kirklees, the Council undertakes audits to assess the health and vitality of existing shopping facilities. Furthermore, it identifies

strengths and weaknesses of the centre's which enable the Council to make valid and accurate judgements in respect of new shopping developments.

- 3.4 The extent to which established centres will be able to withstand the diversion of trade will depend on their strengths and weaknesses in terms of the quality of the shopping environment; the adequacy and convenience of car parking; the range of goods and services available; the competitiveness of such facilities; and the convenience of the centre's layout. All of these factors contribute to the retail structure of a centre and will, to a greater or lesser extent, affect the capacity of a centre to weather trade diversion successfully. Shopping centres that have a weak structure are clearly likely to be most vulnerable to trade diversion.
- 3.5 An increasingly important consideration is whether proposed new retail development, by drawing trade away, is likely to put at risk future private and public investment in existing centres, in particular, those town centre "flagship" projects, such as the Kingsgate scheme in Huddersfield, which are essential to the maintenance or enhancement of the centre's vitality and viability.

(ii) The benefit to the quality and range of shopping provision or from meeting an identified quantitative deficiency.

- 3.6 Where it can be shown that a proposed development will provide a new type of retailing, perhaps a specialist facility, or provide facilities of a quality not available elsewhere in the area, this will be taken into account by the Council as a positive factor in balancing the advantages and disadvantages of the proposal in terms of the other criteria in the policy.
- 3.7 This criterion also enables a choice to be made where two or more proposals have been put forward in out of centre locations and each individually could satisfy criteria (i), (v) and (vii), but, cumulatively, they would lead to an unacceptable impact on the viability and vitality of an established centre.
- 3.8 A deficiency is identified by comparing what is currently provided in a centre with the scale and type of provision which might reasonably be expected to meet the needs of the population resident in the centre's catchment area. Such comparison needs to recognise that the actual and potential role of each centre is closely related to its size and distance from other centres, and that people are likely to use more than one centre, particularly if their nearest centre is relatively small.
- 3.9 The scale and nature of any identified deficiency will provide the Council with a basis for assessing how well a particular proposal is likely to fit into the existing pattern of provision, but will not be regarded as an absolute limit on what can be permitted.

3.10 The Council recognises that government guidance requires it to have an understanding of the retail market in its area and, to that end, it monitors retail changes and the relative "health" of shopping centres. It will therefore be in a position to discuss with applicants whether there appear to be deficiencies of provision in any particular area.

(iii) The accessibility of the proposed store to those without private transport.

3.11 New retail development should be located where access by a choice of means of transport (not just by car) is, or can be made, easy and convenient. This accords with one of the key objectives of government guidance which is to maximise the opportunity to use means of transport other than the car. A range of factors will need to be taken into account in judging the "non-car" accessibility of a proposed development: the origin and frequency of bus (or train) services passing the site; accessibility by cyclists; the likelihood of improved services being provided; the number of people living close enough to the site to be able to walk to it; and the convenience and safety of pedestrian routes, particularly the presence of "barriers" to pedestrian access such as the need to cross busy roads.

(iv) The effect on highway safety and local amenity.

- 3.12 Highway safety is a concern which is taken into account by the Council in assessing any development proposal. New retail development can invariably result in changes in traffic movements and the impact of these changes on the local road network will need to be quantified and appropriate measures introduced to ensure that highway safety and local amenity will not be prejudiced.
- 3.13 A number of factors will need to be taken into account in assessing the likely effect of a new retail development on local amenity: the visual impact of the proposed development; the potential for noise disturbance to occupiers of adjoining land and the overlooking of neighbouring property; and the potential loss of trees or other features.

IN THE CASE OF PROPOSED DEVELOPMENTS LOCATED OUTSIDE EXISTING TOWN AND LOCAL SHOPPING CENTRES THE FOLLOWING CRITERIA ALSO APPLY:

(v) Whether suitable sites capable of meeting any identified need for new retail development are likely to be available within, and for out of centre schemes, on the edge of, established town or large local centres.

- 3.14 The requirement to demonstrate the `need' for new retail developments in edge of centre and out of centre locations is confirmed in a Ministerial statement of February 1999. This states that "proposals which would be located in an edge of centre or out of centre location and which:
- are not in accordance with an up-to-date development plan strategy; or
- are in accordance with the development plan but that plan is out of date, is inconsistent with national planning policy guidance, or otherwise fails to establish adequately the need for new retail development,

should be required to demonstrate both the need for additional facilities and that a sequential approach has been applied in selecting the location or the site"

Assessment of need should have regard not only to capacity and demand in relation to expenditure growth and retention, but should also take into account other-factors such as the effect on quality and choice, and on the role and function of existing shopping centres.

- 3.15 The "sequential test" for selecting sites for new retail development should be applied as set out in government guidance. The test requires that "both local planning authorities and developers selecting sites for development should be able to demonstrate that all potential town centre options have been thoroughly assessed before less central sites are considered".
- 3.16 In applying this test the Council acknowledges that the guidance requires that it must be able to demonstrate that any alternative site which it might advance has to be truly suitable, ie capable of providing for the reasonable needs of retailers for access, visibility and building layout, and to be realistically available, ie free of ownership problems which would prevent site assembly, and of physical constraints such as ground contamination which might render development uneconomic. It should be noted that the guidance also states that "developers and retailers will need to be more flexible about the format, design and scale of the development and the amount of car parking, tailoring these to fit the local circumstances".
- 3.17 Under the sequential test, where satisfactory sites within town or large local centres are not available for the accommodation of new stores the "next best" option will be sites on the edge of centres. Only if no suitable site can be found favourable consideration will be given to out of centre locations. Further guidance on the definition of "edge of centre" with particular reference to the main town centres in Kirklees is provided in appendix 3.
- 3.18 When an out of centre location can be shown to be the only practical option for new retail development preference will be given to sites within the built-up area rather than beyond its edge, and to brownfield rather

than greenfield sites. Within the built-up area the optimum locations are likely to be as close as possible to a town centre and on a radial road leading to other shopping facilities. Such a combination of factors should maximise the potential for linked shopping trips and thereby minimise proliferation of car journeys.

(vi) Whether they would prejudice other proposals in the plan, particularly provision for the protection of open land.

- 3.19 In reaching a decision on any planning application, and especially one involving large scale development, it is important to ensure that the proposal will not undermine the objectives or strategy of the Unitary Development Plan. Government guidance (PPG6) makes clear that proposals for retail development should not normally be allowed on land designated for other uses in the development plan. This advice applies particularly to land allocated for business and industry and housing, where retail development would have the effect of limiting the range, location and quality of sites that would be available for such uses.
- 3.20 Similarly, the loss of protected open space to retail development will not be appropriate. In view of their size, large new stores tend to be proposed on areas of open land, especially where the sequential test (see (v) above) may demonstrate that no site within or on the edge of a centre is available. However, the lack of such alternative sites will not in itself be sufficient justification for accepting the loss of open land.
- 3.21 The fact that a site is not allocated for a specific use in the UDP does not mean that its development will necessarily be acceptable. Regard must also be had to any plan proposals for areas adjoining a proposed site for a new retail development. As an example, it will not be acceptable for a large store to be sited next to an area to be developed for housing if the local road network could not accommodate the total level of traffic which would be generated.

(vii) The effect of out-of-centre developments on travel patterns and car use.

- 3.22 Government guidance (PPG6 and PPG13) makes clear that greater scrutiny of travel patterns is necessary to ensure that new retail developments are in locations which support more sustainable transport choices and reduce the need to travel, particularly by car. The Council will therefore expect proposals for out of centre retail developments to take account of the likely effect of the development on travel patterns, car use and air pollution.
- 3.23 New developments should be easily and safely accessible by a choice of means of transport, reduce reliance on the car and have the propensity for linking or combining trips, ie. food with non-food

shopping, shopping with leisure etc. However, developments which by their location would only allow convenient access by car can often lead to an increase in driven mileage or result in traffic congestion with a consequent increase in polluting emissions and will not normally be appropriate.

- 3.24 Where the scope for further retailing within existing centres is limited, edge of centre sites should be pursued which are close enough to be readily and conveniently accessible to the centre by foot, with good access to public transport and where car parking can be shared with other town centre uses.
- 3.25 Alternative sites within the urban area may be acceptable for major travel generating uses where there is a clearly defined need provided they are accessible by a choice of means of transport (including public transport), accord with the need to reduce travel distances and do not cause other highway problems. Such proposals should not adversely affect the vitality and viability of existing shopping centres and will be required to meet the requirements of PPG6 in terms of the sequential test.

4 ADDITIONAL INFORMATION REQUIRED FOR PROPOSED DEVELOPMENTS

- 4.1 In order to assist the Council in its assessment of the development proposal, all applications for retail proposals over 2,500 square metres gross floorspace should be supported by evidence provided by the developer on likely economic impact, accessibility, travel patterns and significant environmental impact. Applicants will have to show that they have adopted the sequential approach to site selection and considered alternative sites.
- 4.2 Similar information may also be necessary for developments smaller than 2,500 square metres gross which are likely to have a large impact on a town or local centre. The requirement for information will be dependent on the relative size and nature of the development in relation to the centre. The applicant should contact the Planning Service for further guidance about what information will be necessary for smaller schemes.
- 4.3 The Council may also consider that the developer should prepare a Transport Impact Assessment to address a range of matters, including the effect of the development on the adjacent highway network and compatibility with the Council's transport policies. The likely effect of the development on the capacity, safety and congestion levels on adjacent highways in terms of traffic generation and public transport facilities should be set out. Further guidance on traffic impact assessments can be obtained from the Council's Highway Service.

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5 THE USE OF RESTRICTIVE PLANNING CONDITIONS

Introduction

- 5.1 Planning conditions to limit the range of goods sold and to restrict the scope for the subdivision of retail developments to create small shops provide the means by which specific proposals may be made acceptable to the Council under the terms of policy S4. Government guidance also advocates the use of such conditions to ensure that retail developments for which planning permission is granted do not change over time in ways which may be to the detriment of the vitality and viability of established centres.
- 5.2 Conditions restricting the range of goods to be sold and subdivision will be applicable to developments in both edge of centre and out of centre locations. In the case of restrictions on the range of goods to be sold, a "negative" condition will be applicable in edge of centre locations while a "positive" condition will be applicable in out of centre locations. This difference reflects the fact that a greater range and variety of retail product categories is likely to be acceptable in edge of centre locations. This is because there is likely to be a significantly greater relationship between the role of a town centre and the function of an edge of centre development. For example, an edge of centre development may address a weakness in the range of comparison goods on offer in a particular town centre. Consequently, the improvements in shopping provision and the ability to secure shared shopping trips will benefit the town centre as a whole.
- 5.3 Proposals for the sale and display of motor vehicles, if permitted without restriction, will have the benefit of permitted change of class AI retailing. Where it is appropriate to prevent such a future change, the Council will apply a restrictive condition.

Edge of centre locations

5.4 The nature of retail development permitted on the edge of town centres is likely to need to be restricted to some degree, depending on the strengths and weaknesses on the centre in guestion. Principally, restrictions will be designed to avoid the duplication of facilities within the centre, or to be incorporated within development or redevelopment schemes proposed for the centre, which are critical to the shopping function of the centre. The beneficial role of edge of centre locations is primarily to provide the opportunity to extend the range of shopping available and increase the attraction of the centre as a whole.

5.5 The following "negative" condition will be applied to edge of centre permissions. Sales of the goods listed underpin comparison shopping within established centres and the maintenance of this range of retailing is likely to be critical to a centre's continuing viability and vitality. However, specific circumstances may be such that sales of some of the goods listed would not be detrimental to the adjoining centre, in which case the list of goods sales restricted by condition would be reduced.

"The premises shall not be used for the sale of food for consumption off the premises (other than confectionery), clothing, including sportswear and children's clothing, shoes, toys, fashion accessories including handbags and luggage, watches and jewellery, perfume and toiletries, books, music records, video tapes, audio tapes and computer software, without the prior consent of the Local Planning Authority."

- 5.6 It will be appropriate to apply a condition restricting the subdivision of retail development permitted in edge of centre locations where the adjoining centre is already well supplied with small shops. The condition will ensure that the edge of centre development complements the adjoining centre rather than weakening the vitality and viability of the centre.
- 5.7 The minimum unit size permitted by such a condition will normally be 750 square metres. This represents the usual minimum size for a retail warehouse outlet. However, lower minimum unit sizes may be permitted where this can be justified by local circumstances.

Out of centre locations

5.8 When planning permission is granted for retail developments in out of centre locations a "positive" condition will be applied to restrict the range of goods to be sold. The permitted range will comprise bulky goods, sales of which will generally have little impact on the viability of established centres because they contain few if any outlets primarily selling such goods. As with restrictions on the range of goods to be sold in edge of centre locations, it may be appropriate to widen the range which can be sold from out of centre stores where nearby centres are sufficiently robust to be able to withstand additional competition. The standard condition is as follows:

"The premises shall only be used for the sale of DIY furniture, floor coverings, car accessories and electrical goods and, with the prior consent of the Local Planning Authority, other retail trades dealing in bulky goods and requiring display areas of a size unavailable in an established centre."

- 5.9 The application of a condition restricting the subdivision of out of centre development will be appropriate for the same reason that this type of condition is applicable in respect of edge of centre development, namely, to ensure that the development permitted does not simply come to duplicate the sizes of units in plentiful supply within established centres and thereby undermine the viability of those centres.
- 5.10 It is recognised that, given present methods of retailing, the restriction of out of centre developments to bulky goods sales means that it is unlikely that the subdivision of such units would take place if not expressly prohibited. However, as the nature of retailing changes, this situation may also change; consequently, the restriction on subdivision can be justified as a precautionary measure.
- 5.11 The minimum size of unit permitted will be as described in paragraph 5.7 above.

The Sale and Display of Motor Vehicles

- 5.12 Locations for the sale and display of motor vehicles are principally dictated by good visibility and accessibility, and close proximity to other car showroom facilities. Whilst a number of existing car showrooms are in edge of centre locations, many others trade from free-standing positions and are compatible with uses of a commercial/industrial nature.
- 5.13 It is important that developments for the sale and display of motor vehicles do not subsequently change their character unacceptably in ways which would create a development that the Council would have refused on the grounds of impact on the vitality and viability of existing shopping centres. Therefore, permissions for the sale and display of motor vehicles will be controlled by planning condition where it is appropriate to prevent their change of use to retailing, which is currently permitted through the amendment to the General Permitted Development Order 1995.

APPENDIX 1

EXTRACT FROM THE UDP

LARGE NEW STORES

- 13.21 Changes in the nature of retailing in response to, and resulting from, economic and social change have led to proposals for the development of large new stores both within and outside existing centres for the sale of both food and non food goods. New forms of retailing of a scale which widens choice for the consumer without seriously threatening the viability and vitality of existing shopping centres can be accommodated, however proposals for retail development over 2,500m² gross floorspace will need to be supported by evidence on the likely change in travel patterns and any significant environmental impacts.
- 13.22 The preferred location for such development will be either within or adjoining existing town or large local shopping centres because they are the focus of both public and private transport. However, in the event of existing town or large local centres being physically incapable of accommodating major retail development proposals, other locations may be acceptable subject to consideration of the effect on existing shopping provision and on the site and its surroundings. This accords with the 'sequential test' for selecting sites for new retail development as set out in PPG6. The impact of out of centre proposals on established shopping centres will need to be assessed having regard to any adverse impact on those centres already evident or. likely to arise from recently completed retail development or schemes with planning permission. The loss of land clearly required for industry and incursions into the open countryside will be inappropriate. These safeguards will ensure that the viability of established shopping centres is not undermined, that the sites proposed are suitable for retail development and that the proposed development will improve the range and availability of shopping facilities.
- S4 PROPOSALS FOR LARGE STORES WILL BE CONSIDERED HAVING REGARD TO:

i. THE LIKELY EFFECT ON THE VIABILITY AND VITALITY OF ANY EXISTING TOWN OR LARGE LOCAL CENTRE;

ii. THE BENEFIT TO THE QUALITY AND RANGE OF SHOPPING PROVISION OR FROM MEETING AN IDENTIFIED QUANTITATIVE DEFICIENCY;

iii. THE ACCESSIBILITY OF THE PROPOSED STORE TO THOSE WITHOUT PRIVATE TRANSPORT;

iv. THE EFFECT ON HIGHWAY SAFETY AND LOCAL AMENITY;

AND IN THE CASE OF PROPOSED DEVELOPMENTS LOCATED OUTSIDE EXISTING TOWN AND LOCAL SHOPPING CENTRES

v. WHETHER SUITABLE SITES CAPABLE OF MEETING ANY IDENTIFIED NEED FOR NEW RETAIL DEVELOPMENT ARE LIKELY TO BE AVAILABLE WITHIN, AND FOR OUT OF CENTRE SCHEMES, ON THE EDGE OF, ESTABLISHED TOWN OR LARGE LOCAL SHOPPING CENTRES;

vi. WHETHER THEY WOULD PREJUDICE OTHER PROPOSALS INTHE PLAN, PARTICULARLY PROVISION FOR THE PROTECTION OF OPEN LAND;

vii. THE EFFECT OF OUT-OF-CENTRE DEVELOPMENTS ON TRAVEL PATTERNS AND CAR USE.

13.23 Where a future change in operations could be prejudicial to the vitality of an existing shopping centre, it may be necessary to restrict the range of goods sold from the premises either by a planning condition or legal agreement, or to restrict the subdivision of retail warehouses by a planning condition.

APPENDIX 2

SHOPPING CENTRES IN KIRKLEES

Town Centres	Huddersfield Dewsbury Heckmondwike Batley Cleckheaton
Large Local Centres	Mirfield Holmfirth Aspley Milnsbridge Marsh Honley Ravensthorpe Birstall Mold green Crosland Moor Waterloo Slaithwaite Birkby Lindley Lockwood Marsden Skelmanthorpe Almondbury Fartown Bar Kirkburton

APPENDIX 3

Defining edge of centre locations

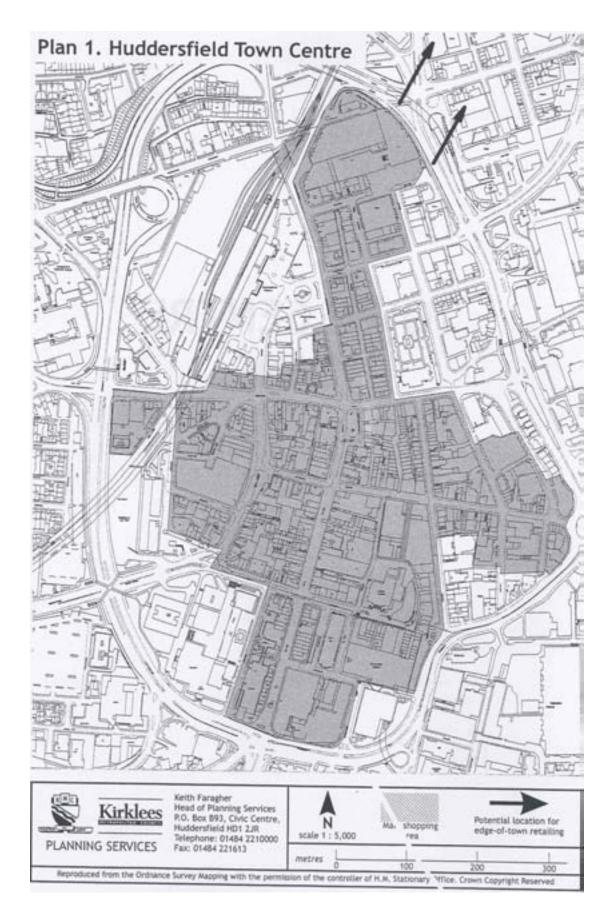
- A3.1 Plans 1-5 of the main town centres in Kirklees identify the main shopping areas where shopping activity is concentrated. The main shopping areas have been defined to accord with" primary shopping areas" referred to in PPG6 and will determine edge of centre locations.
- A3.2 Potential locations for edge of centre retailing are indicated by arrows on each town centre plan and have been identified on the basis of current knowledge taking account of the structure of each centre and the nature of the uses around the edges. The locations represent broad areas on the edges of these centres where retail uses have already been established and could be extended, or where there is currently little or no retailing but such development could be acceptable.
- A3.3 The identification of some edge of centre areas as having potential for retail development does not imply that other edge of centre locations would not be positively considered for retail development were proposals to be advanced.
- A3.4 Edge of centre locations typically contain a mixture of land uses which have evolved over a long period of time. Business and industry tends to be the predominant land use. Under-used and vacant buildings are often found adjacent to active businesses and land ownership is often fragmented. The overall quality of the local environment is likely to be poor. These areas may also be separated from the adjoining town centre by major roads (or railways) inhibiting pedestrian access to and from the centre.
- A3.5 In such areas there tend to be significant constraints on development, particularly the complexity of site assembly where there is multiple ownership, the need to demolish buildings, relocate remaining uses and remove any contamination resulting from previous uses and the need to achieve adequate arrangements for vehicular access when highway frontage may be restricted. Consequently it is not possible to identify specific opportunities for retail development with any certainty.
- A3.6 In order to determine whether or not a retail proposal can be defined as being in an edge of centre location, the following criteria need to be satisfied:

i) The proposed development should be located within 200-300 metres walking distance of the main shopping area.

ii) The pedestrian links with the centre should provide a high standard of convenience and safety.

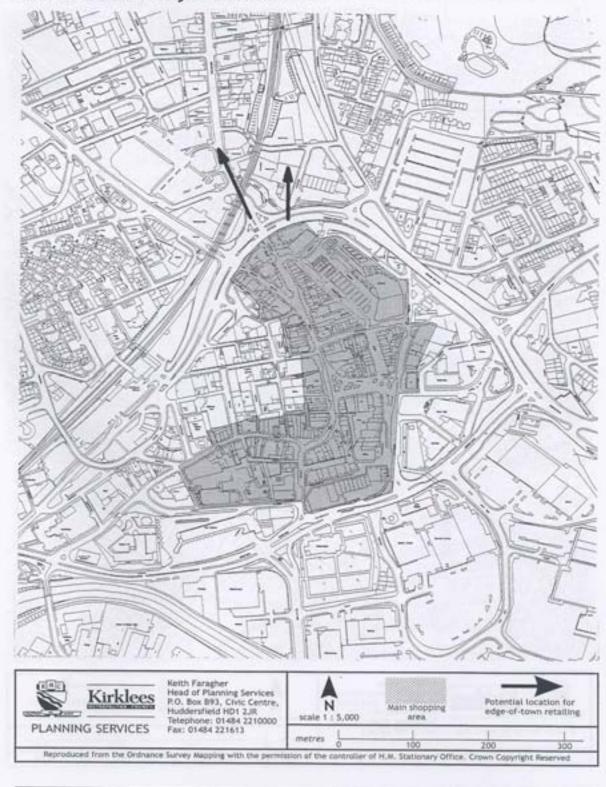
UNITARY DEVELOPMENT PLAN

TOWN CENTRE PLANS

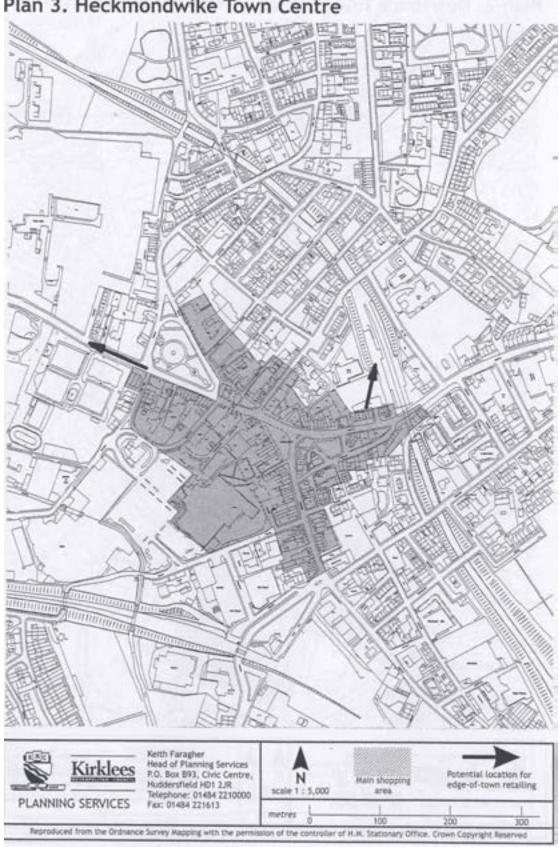


UNITARY DEVELOPMENT PLAN





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Plan 3. Heckmondwike Town Centre



