Appendix CS1- Map of approvals in relation to the application sites

Burton Street (61 dwellings under construction)

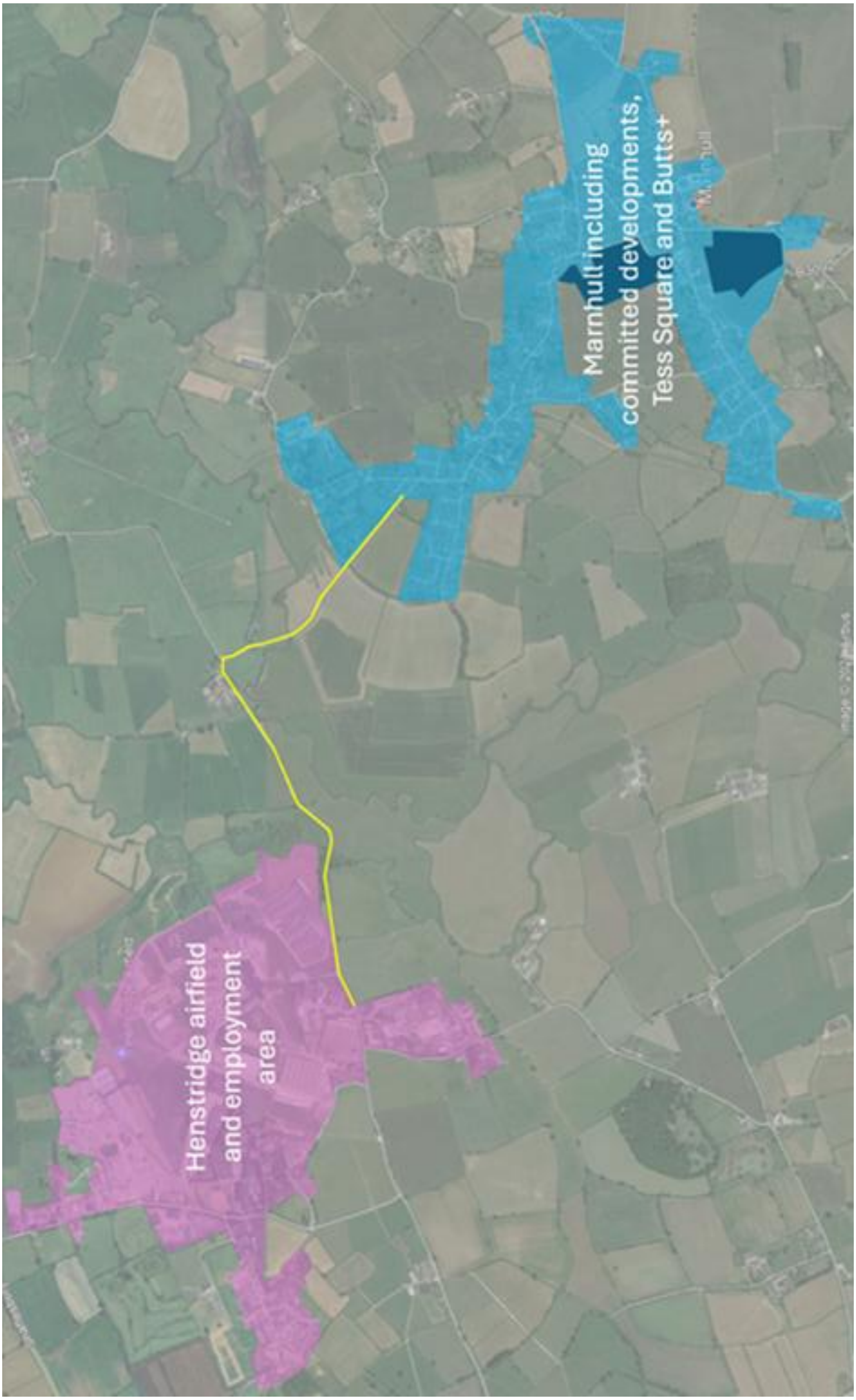
Salisbury Street (up to 67 dwellings allowed on appeal

Crown Road (72 dwellings allowed on appeal

CL Planning

Appendix CS2- Nearby employment area Henstridge Airfield and employment area (South Somerset Council)

CL Planning


Marnhull including
committed developments,
Tess Square and Butts+
Henstridge airfield
and employment
area

Appendix CS3- Retail Sequential Test

TESS SQUARE, MARNHULL

RETAIL SEQUENTIAL TEST STATEMENT

September 2024

Version: 2

Version Control	Name	Date
Report author:	Richard Mitchell BSc (Hons) MPlan Cert MSc	September 2024
Checked by:	Clare Spiller BSc (Hons) PG Dip TP MRTPI	September 2024

Executive Summary

This Retail Sequential Test (RST) statement supports a planning appeal for full compliance of a hybrid application namely a mixed-use development comprising a food store, office space, café, and mixed-use space and 2x 2-bed flats, the demolition of redundant agricultural sheds, as well as parking provision for St. Gregory's Church and St Gregory's Primary School alongside associated landscaping, engineering operations, access arrangements.

The Test Square parcel is located on the western side of Church Lane, situated between the two conservation areas in Marnhull. The appeal site adjoins the settlement boundary of Marnhull, there are a number of listed buildings proximate to the appeal site. The site is otherwise unencumbered by planning and environmental designations.

Guided by the requirements of the National Planning Policy Framework and relevant case law, this assessment seeks to identify and assess the availability of alternative premises and alternative sites and premises with the potential to accommodate the proposed quantum of floorspace, looking first at:

- Town centre locations, followed by;
- Edge-of-centre locations, and only then at; and
- Out-of-centre locations.

The proposal has been expressly designed to meet the needs of Marnhull one of largest villages in North Dorset. The proposal will enhance the everyday facilities to the expanding village of Marnhull, and will reduce the need to for travel aiding climate change. aA retail impact assessment is not required.

Potential sites have been identified from various sources, including:

- Desktop and walkover survey;
- Survey of vacant premises and sites being actively marketed through commercial agents;
- Reports (press and Council) of under-utilised sites;
- The Council's Strategic Housing Land Availability Assessment;
- The Council's Brownfield register;
- Extant planning permissions and live applications;
- Allocations in the Development Plan; and
- A review of emerging Local Plan and Neighbourhood Plan policies.

Site suitability and availability have been given due consideration. With respect to suitability, this takes account of physical (such as size and topography), environmental (such as flood risk) and planning constraints. Availability relates to ownership (and degree of fragmentation), the presence of a willing and able vendor (or otherwise), terms and market viability.

The assessment identified 60 potential premises and sites worthy of more detailed investigation; albeit each was dismissed on the basis of suitability and / or availability. As such, there are considered to be no sequentially preferable sites that could reasonably accommodate the proposed development.

Contents

1. Introduction

1.1 This Retail Sequential Test (RST) statement has been prepared on behalf of Mr Paul Crocker ("the appellant") to assess the implications of the proposed food retail store and smaller town centre uses which were proposed as part of the planning application ref: P/OUT/2023/02644 consisting of:

'Hybrid planning application consisting of:

A full planning application for a mixed-use development comprising a food store, office space, café, and mixed-use space for E class uses (e.g. estate agents, hairdresser, funeral care, dentist, vet), and 2x 2-bed flats. Demolition of redundant agricultural sheds. Plus, a new parking area with 30 parking spaces for St. Gregory's Church and St Gregory's Primary School. Associated landscaping and engineering operations, access arrangements, on land west of Church Hill, Marnhull.'

Outline planning application with all matters reserved except for access for up to 120 dwellings on land off Butts Close and Schoolhouse Lane, Marnhull'

1.2 This planning application was refused on 16th July 2024. Reason for refusal no. 2 of the decision notice stated:

'2.The proposed development includes main town centre uses (use class E) measuring 2,356 sqm which is not considered to be small scale rural development contrary to Policies 2, 11 and 12 of the adopted North Dorset Local Plan Part 1, and paragraphs 90 and 91 of the National Planning Policy Framework.'

1.3 The accompanying case officer report refers to Policy 12 (Retail, Leisure and Other Commercial Developments) of the North Dorset Local plan which requires applications to be supported by a Retail Sequential Test. The Council, therefore, consider the following:

'Part of the proposal comprises the creation of a new centre, consisting of a convenience food store (including post office and in-store café), and units for E class uses (stated to be estate agent, hairdresser, funeral care, dentist and vet, and office units). Together the floor area for these total 2,356sqm. Cumulatively, and in some cases individually, these uses are 'main town uses'. It is considered that this constitutes a significant development that would have a significant impact on this rural village Marnhull.'

1.4 The northern parcel is located outside of but adjacent to the settlement boundary of the village of Marnhull. The parcel is situated to the west of Church Hill. This parcel is relatively level and includes the existing doctors surgery, pharmacy and car park accessed off Church Hill. The doctors surgery and pharmacy are clearly community facilities. When they were granted permission in 2002 they were (and still are) on land outside of the settlement boundary (the map was adopted Jan 2003). The appeal proposal is to provide additional local services and community facilities to the south and west of the existing doctors/pharmacy building, to primarily serve the existing and future residents (from consented housing developments which are being built out) of Marnhull which will reduce the need of these residents to travel beyond Marnhull. Therefore, this proposal will reduce emissions and be a sustainable form of development. Marnhull is a large village in North Dorset. The closest town centre is Sturminster Newton, followed by Gillingham, Shaftsbury and finally Blandford.

1.5 This Sequential Test is submitted without prejudice; and in the alternative should the Inspectorate opine that the proposed development goes beyond what might reasonably be reasonably regarded as small-scale development which is to serve the existing and future residents of Marnhull.

1.6 The figure below shows the location Marnhull in relation to the surrounding settlements:

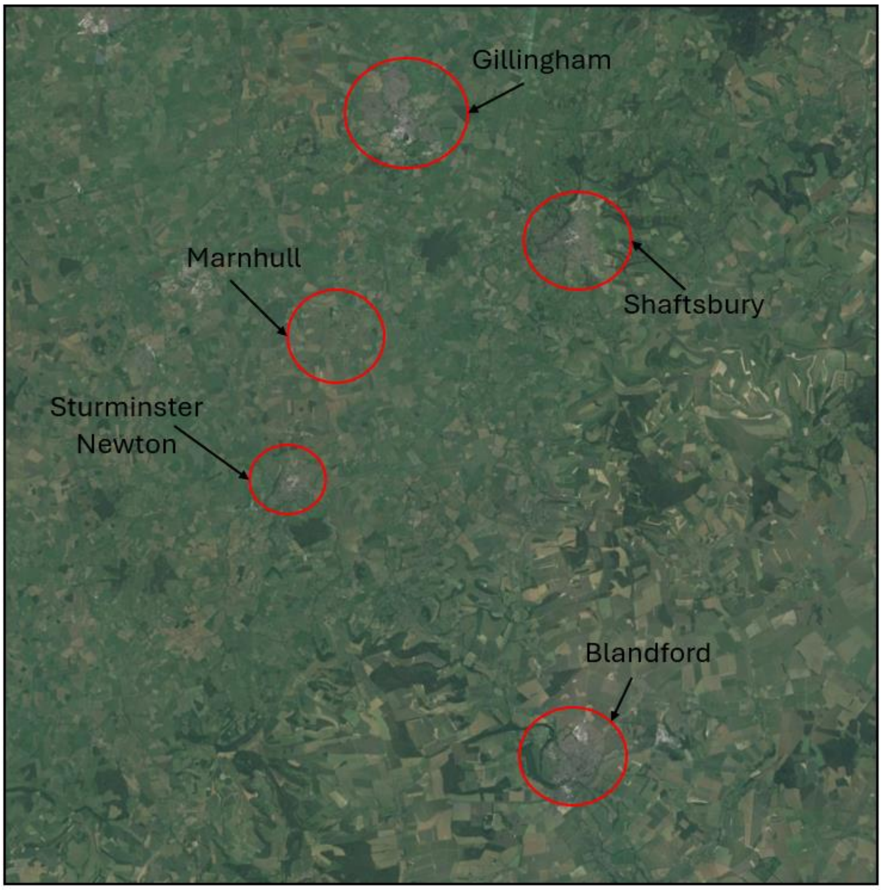


Figure 1: Site Location relative to surrounding settlements

1.7 This Section provides an introduction, while Section 2 describes the site and its surroundings. Section 3 sets out the relevant retail planning policy context against which the application falls to be considered against. Section 4 outlines the parameters of the sequential test, whilst Section 5 provides details of its methodology. Section 6 assesses the proposal against the sequential test. Finally, our conclusions are provided at Section 7.

2. Relevant Planning Policy

National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

2.1 The Government published the revised National Planning Policy Framework (NPPF) in December 2023. The NPPF sets out the overarching policy priorities for the planning system, against which local plans will be prepared and decisions made on planning applications. The policies in the revised NPPF are material considerations when determining planning applications.

2.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision taking, this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole.

2.3 The NPPF makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 9 of the NPPF sets out to facilitate sustainable development, planning policies and 'decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area'. Pursuing sustainable development includes making it easier for jobs to be created in cities, towns and villages, and improving the conditions in which people live, work, travel and take leisure.

2.4 The NPPF covers several topic areas. Those that are of most relevance to the proposed development include: building a strong, competitive economy; ensuring the vitality of town centres; promoting healthy and safe communities; and making effective use of land.

2.5 Paragraph 85 of the NPPF demonstrates the government's commitment building a strong and competitive economy through the planning system in order to create jobs and prosperity, stating that *'decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development'.* The draft NPPF was published for consultation on 30th July 2024 with the consultation closing on 24th September 2024 that further demonstrates and reaffirms the government's commitment building a strong and competitive economy through the planning system in order to create jobs and prosperity.

2.6 Paragraph 86 recognises the need for flexibility when it comes to seizing opportunities for economic growth, requiring councils to *'be flexible enough to accommodate needs not anticipated in the plan… and enable a rapid response to changes in economic circumstances'.*

2.7 The Government's approach to planning for retail development is set out in Section 7 of the NPPF, entitled 'Ensuring the vitality of town centres'. Paragraphs 90 – 95 of the NPPF seek to ensure the vitality of town centres, with paragraph 91 setting out the requirement for a sequential approach to locating town centre uses which are for 'main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan'.

2.8 Paragraph 91 continues stating that 'Main town centre uses should be located in town centres, then in 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'.

2.9 Paragraph 92 outlines that 'when considering edge or out-of-centre proposals, preference should be given to accessible sites that are well connected to the town centre. Both applicants and councils should demonstrate flexibility on issues such as format and scale, in order that opportunities for using suitable town centre and edge-of-centre sites are fully explored'.

2.10 Paragraph 94 explains that when assessing planning applications for retail development that are outside of town centres, which are not in accordance with an up-to-date local plan, councils should require an impact assessment if the development is over a proportionate, locally set floor space threshold (if there is no locally set threshold, the default threshold is 2,500sqm of gross floorspace).

2.11 The Development Plan does not impose a threshold and it is noteworthy that the proposed development would not exceed the default floor space threshold set out in the NPPF. As such, a full retail impact assessment is not required.

2.12 Paragraph 95 details that where an application 'fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 94, it should be refused'.

2.13 The appellant is of the opinion that the proposal is to provide retail facilities which will serve the existing and future occupants of Marnhull which means locationally the proposal needs to be in Marnhull. Therefore, to provide the propsoed retail facilities within one of the town centres in North Dorset would not provide locational link with Marnhull and would not fulfil the purpose of this application which is to create a village centre.

2.14 Paragraphs 96 and 97 of the NPPF encourage councils to plan positively for the provision of community facilities, including shops, and other local services to enhance the sustainability of communities and residential environments.

2.15 Of relevance to this guidance is the glossary which explains what is covered within the definition of 'Town centre' within Annex 2: Glossary:

'Town centre: Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.'

National Planning Practice Guidance (NPPG)

2.16 National Planning Practice Guidance (NPPG) offers further guidance on the sequential test:

<u>How should the sequential test be used in decision-making?</u>

It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority is expected to support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test will need to be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity. In this instance officers requested a report which assessed the need for the retail and commercial element of the proposal at the point of registration. A Retail Technical Note by Lichfield's was submitted in support of the application. There was no request for a Retail Sequential Test at the point of registration.

The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- *with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.*
- *is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
- *if there are no suitable sequentially preferable locations, the sequential test is passed.*

In line with paragraph 86 of the National Planning Policy Framework, only if suitable sites in town centre or edge of centre locations are not available (or expected to become available *within a reasonable period) should out of centre sites be considered. When considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.*

Paragraph: 011 Reference ID: 2b-011-20190722
Revision date: 22 07 2019

How should locational requirements be considered in the sequential test?

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. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.

Paragraph: 012 Reference ID: 2b-012-20190722
Revision date: 22 07 2019

Development Plan

2.17 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the adopted Development Plan unless material considerations indicate otherwise. In this instance, the Development Plan comprises:

- North Dorset Local Plan Part 1 (2016);
- Saves Policies of the North Dorset District-Wide Local Plan 1st revision (2003); and
- Made Neighbourhood Plans – Blandford, Gillingham, Shaftesbury and Sturminster Newton.

North Dorset Local Plan Part 1

2.18 Policy 1, titled 'Presumption in Favour of Sustainable Development', echoes the NPPF's presumption in favour. This confirms the Council's commitment to working positively and proactively to approve proposals wherever possible, to secure development that improves the economic, social and environmental facets of the area. This policy also clarifies:

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: a any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or b specific policies in that Framework indicate that development should be restricted.

2.19 Policy 11, titled 'The Economy', States that Economic development in the countryside (including at Stalbridge and the District's villages) will be supported by:

d- enabling rural communities to plan to meet their own local needs, particularly through neighbourhood planning; and

e- countryside policies (Policies 29 to 32) which may permit: the re-use of existing buildings; the retention and small-scale expansion of existing employment sites; the provision of certain forms of tourist accommodation; and equine-related developments.

2.20 It is considered in this case that the proposal will meet the local needs of Marnhull, which is one of the biggest villages in North Dorset. Therefore, complying with part d of Policy 11.

2.21 Policy 11 continues by saying that mixed-use sites will be considered at edge-of-town-centre locations, with a focus on offices and non-B class employment uses; while town centres will be the main focus for retail, leisure and other commercial activities in line with Policy 12.

2.22 Policy 12, titled 'Retail, Leisure and Other Commercial Developments', sets out for the 'purposes of considering any proposal for retail and other main town centre uses in North Dorset Blandford Forum, Gillingham, Shaftesbury and Sturminster Newton are designated as town centres.'

2.23 Policy 12 continues, clarifying that:

'*The Council will seek to meet the identified needs for main town centre uses by…*

f permitting retail and other main town centre uses in town centres and on sites identified for mixed-use regeneration on the edge of Gillingham, Shaftesbury and Sturminster Newton town centres, as identified in Policy 11 – The Economy and Policies 17 to 19.'

2.24 Policy 12 goes on and sets out that:

'Proposals for retail and other main town centre uses that are not in an existing town centre and are not in accordance with the development plan will only be permitted if:

h they satisfy the 'sequential test' in national policy; and

i they will not have a significant adverse impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

j they will not have a significant adverse impact on town centre vitality and viability.'

2.25 Policy 16 titled 'Blandford' sets out the Councils development strategy for the town in supporting economic development the policy states:

In the period up to 2031, additional retail floorspace will be provided through:
n the extension of the existing Tesco supermarket at Stour Park; and
o the provision of a new supermarket off Shaftesbury Lane.

Town centre regeneration will embrace a range of town centre uses, not only retail and commercial but community and leisure as well as residential uses, and will be encouraged. An important element of town centre regeneration will be land to the south of East Street, including land around the existing retail store. On appropriate sites, all development and redevelopment schemes which support town centre regeneration, such as the extension of existing retail units south of Market Place and East Street, will be viewed positively within the recognised constraints of heritage and flooding considerations. The emerging neighbourhood plan for Blandford will have a key role to play in identifying regeneration opportunities in the town

2.26 Policy 17 titled 'Gillingham' sets out the Council's development strategy for the town in supporting economic development the policy states:

In the period up to 2031, additional retail floorspace will be brought forward:
o with a focus on comparison retailing as part of the mixed-use regeneration of the Station Road Area; and
p as local shops forming an integral part of the local centre to serve the SSA to the south of the town, in accordance with Policy 21.

The main focus for additional retail provision and other town centre uses will be land within the existing Town Centre and land proposed for mixed use regeneration at Station Road.

2.25 Policy 18, titled 'Shaftesbury', sets out the Council's development strategy for the town in supporting economic development the policy states:

i- Employment needs of the town for the period up to 2031 will be met through: i the development of land to the south of the A30; and
j the development of vacant sites on existing industrial estates; and
k the retention of existing employment sites.

Mixed-use regeneration will be encouraged on land within and to the east of the existing town centre. Within the town's settlement boundary, opportunities for tourist-related development that is sensitive to the landscape and historic setting of the town will be considered favourably.

2.26 Policy 19 titled 'Sturminster Newton' sets out the Council's development strategy for the town in supporting economic development the policy states:

The main focus for additional retail provision and other town centre uses will be the existing town centre and the redevelopment of the Station Road area. Any scheme for the Station Road area should be designed in accordance with the design and development brief for the area.

To note in the preamble to this policy is at 8.132 Sturminster Newton comprises the main town of Sturminster on the northern side of the River Stour and the smaller village of Newton to the south. The settlement, together with Stalbridge and Marnhull, provide services to the rural west of the District.

Material Considerations

Blandford + Neighbourhood Plan 2011-2033

2.27 The Blandford + Neighbourhood Plan was made in October 2021.

2.28 The Neighbourhood Plan under Policy B8 entitled 'Blandford Forum Town Centre' states:

'Within the Primary Shopping Area, proposals for new Retail floorspace will be supported. Proposals for new E(c) Financial Services, E(g)(i) Offices, C3 Residential and E(e) and F.1 Community Uses on the upper floors of buildings that contribute to the vibrancy and vitality of the town will be supported. Loss of established ground floor Retail floorspace or of an active frontage as a result of a change of use will be resisted.'

2.29 Policy B8 proceeds and outlines that inter alia *'All proposals for development, including a change of use, must preserve or enhance the character or appearance of the Conservation Area.'*

Gillingham Neighbourhood Plan (2018)

2.30 The Gillingham Neighbourhood Plan was made in July 2018.

2.31 The Neighbourhood Plan states under Policy 7 that *'Main town centre uses, including new retail outlets, offices, leisure facilities and largescale tourist accommodation (such as a hotel), will be supported in the Town Centre area (as defined in Figure 8.1)'.*

2.32 Policy 7 continues and states that:

'Retail uses should be focused along the primary shopping frontages (as defined in Figure 8.1).The loss of retail outlets to residential use on the ground floor in areas of primary and secondary shopping frontages will be resisted.'

2.33 This nieghbourhood plan considers town centre redevelopment opportunities. Paragraphs 8.10 to 8.12 sets out how the development of this area 'Station Road' needs to considered 'comprehensively'.

Policy 8 Station Road Mixed Use Area states that:

Development in this area should be compatible with the main aims for its mixed use regeneration, i.e.:

a) To provide for the comprehensive mixed use redevelopment of underutilised land in the area, to comprise a mix of town centre uses including retail units, cafés / restaurants, a new, modern hotel (if there is sufficient developer interest), office space, land for informal recreation including an equipped play area and around 200 new homes.

b) To provide an improved transport hub at the station in line with Policy 10.

c) To rationalise and improve the overall car parking provision within and adjoining the town centre in line with Policy 11.

d) To improve pedestrian linkages and movement within the area and linking the Station to the High Street, including suitable public open spaces within this network of routes.

e) To direct new retail frontages to within the area of search identified in Figure 8.1, which will become part of the primary and secondary shopping frontages.

f) To ensure that existing and proposed uses are compatible in terms of any noise, disturbance that they may generate.

g) To reflect the heritage and character of Gillingham in the design, whilst allowing for a modern, forward-looking scheme.

A comprehensive masterplan prepared in partnership with the major landowners, transport providers, the Local Planning Authority and Town Council and involving retail representatives and the local community will be prepared to help guide these proposals.

The post amble to this policy at 8.13 states:

There are other, smaller sites within the town centre area that provide potential opportunities for redevelopment. The Town Council welcomes approaches from new businesses looking to establish in the town centre and will direct them to any potential opportunity sites where these exist

2.34 Therefore, the appellant is of the opinion that any sites which may be found within the area identified 'Station Road' can be dismissed as the NP is looking for comprehensive redevelopment of the area.

<u>Shaftsbury Neighbourhood Plan (2022)</u>

2.35 The Shaftesbury Neighbourhood Plan was made in June 2022.

2.36 The Neighbourhood Plan under Policy SFTC1 outlines that development proposals within the town centre area (the area within the blue line on Map SFTC1) will be supported if they meet one or more of a number of aspirations.

2.37 Policy SFTC2 advises that for the main shopping frontages within the primary shopping area (as shown by the red line on Map SFTC1), the use of ground floor or street level units should fall within one or more of the following use classes.

- Commercial, Business or Service (Class E)
- Learning and non-residential institutions (Class F1)
- Local community (Class F2)
- Other sui generis uses deemed compatible, including public house or drinking establishments; hot food takeaway establishments (except within the section known as The Narrows, as shown on map SFTC1); live music venues; theatres; cinemas; concert halls; bingo halls; and dance halls.

<u>Sturminster Newton Neighbourhood Plan</u>

2.38 The Sturminster Newton Neighbourhood Plan 2016-2031 was made in March 2019.

2.39 The Neighbourhood Plan under Policy 15 entitled 'Improving the Town Centre' states *'Development proposals within the town centre area (as defined on Map 11) that demonstrate that they contribute to, and do not undermine, the improvement of the town centre'* as assessed against a range of aspirations as set out in Policy I5 will be supported.

Development proposals within the town centre area (as defined on Map 11) that demonstrate that they contribute to, and do not undermine, the improvement of the town centre as assessed against the following aspirations will be supported:

- *maintaining a strong and vibrant retail presence within the town centre area, including the*
- *continued operation and expansion of the street market*
- *maintaining a range of services and facilities which attract visitors to the town (including*
- *cultural/arts/community venues, overnight accommodation and food/drink establishments)*
- *providing opportunities for office-based employment, which complement and support the town centre's vitality and viability*
- *providing opportunities for housing on otherwise underused upper floors*
- *protecting and enhancing the area's historic and architectural charm*
- *creating a safe and pedestrian friendly public realm*
- *providing sufficient public and private car parking serving the town centre to cater for forecast needs*

Material Considerations

Joint Retail and Commercial Leisure Study (2018)

2.40 This study was commissioned jointly by North Dorset, West Dorset and Weymouth and Portland Councils. It looks at retail and leisure across the study area, taking into account health checks and predicting future needs.

2.41 The study assesses the future need ("capacity") for new retail (convenience and comparison goods) floorspace over the Plan period to 2040. The overall findings of this update will be used to inform the emerging Dorset Council Local Plan.

Emerging Local Plan

2.42 The Council has rolled forward its 2003 District-wide Local Plan First Edition policies maps, subject to some amendments brought about through the 2016 North Dorset Local Plan Part 1. The Council intended to undertake a wholescale review of the Development Plan policies map through the Local Plan Part 2; however, this was subsequently abandoned in favour of an all-encompassing Dorset Local Plan.

2.43 Dorset Council is at the early stages of a Dorset-wide local plan, including that of North Dorset. The local plan timetable has now been pushed back to proposed adoption being May 2027. In line with NPPF paragraph 48, minimal weight can be attributed to the emerging plan at this stage.

3 Parameters of the Sequential Test

3.1 Paragraph 91 of the National Planning Policy Framework (NPPF) states that:

'Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in 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.'.

3.2 Main town centre uses are defined in the glossary of the NPPF as including retail development. The sequential test aims to direct such development to the optimum location, focusing growth within town and city centres where possible.

3.3 *Where no such sites are available, the next sequentially preferred location for retail development will be at the edge of the centre, which is defined by the glossary of the NPPF as 'well connected to, and up to 300m from, the primary shopping area'. For all other main*

town centre uses, a location within 300 metres of a town centre
boundary. An out-of-centre location is defined by the NPPF as a location that is not in or on the edge of a centre, but not necessarily outside the urban area.

3.4 In order to carry out a retail sequential assessment, the site needs to be looked at in the context of the NPPF's tests, with the first stage being to assess sites within the town centre boundaries. Thereafter, the test requires an assessment of sites within 300m of the primary shopping area. Sturminster Newton, Gillingham, Shaftsbury and Blandford all have adopted Neighbourhood Plans (NP) and these NP all define the relevant town centre boundaries, which will be discussed in the relevant sequential tests areas.

Blandford Forum

3.5 Policy B8 entitled 'Blandford Forum Town Centre' of the made Blandford + Neighbourhood Plan 2011-2033, establishes the Town Centre Area boundary and the Primary Shopping Area, as shown on the Town Centre Policies Map appended to the Neighbourhood Plan. The Town Centre boundary is identified outlined in blue while the Primary Shopping Area is identified in yellow shading.

3.6 An excerpt of Town Centre Policies Map is provided in Figure 2 below.

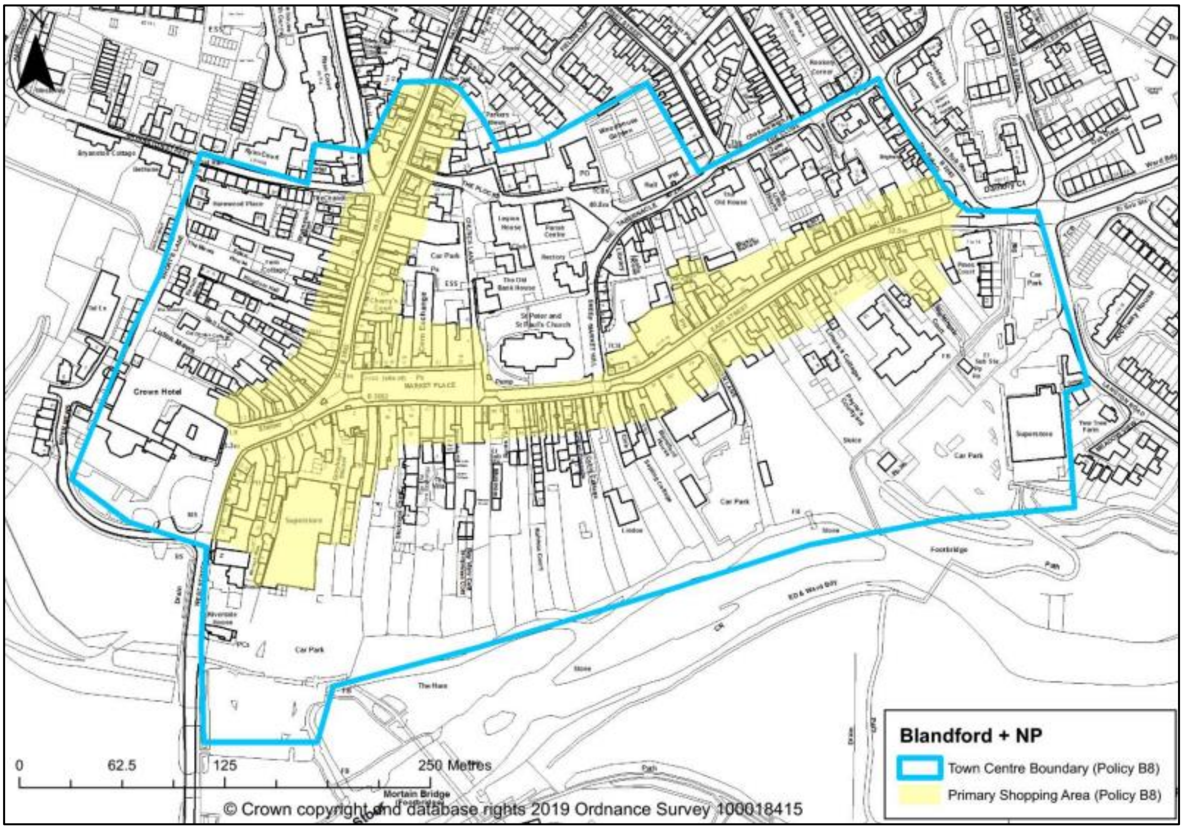


Figure 2: Excerpt of Town Centre Policies Map

3.7 Figure 3 below sets out the Town Centre Boundary outlined in red and a 300m radius around it illustrated in yellow.

Figure 3: Blandford Town Centre Area boundary + 300m radius

Gillingham

3.8 Policy 7 entitled 'Development within the Town Centre boundary' of the made Gillingham Neighbourhood Plan, defines the Town Centre Area and the Primary Shopping Frontage, as shown on the Gillingham Town Centre map. The Town Centre area is encircled by a broken brown line and the Primary Shopping Frontage area is identified outlined in a continuous red line.

3.9 An excerpt of Town Centre Area Map is shown in Figure 4 below.

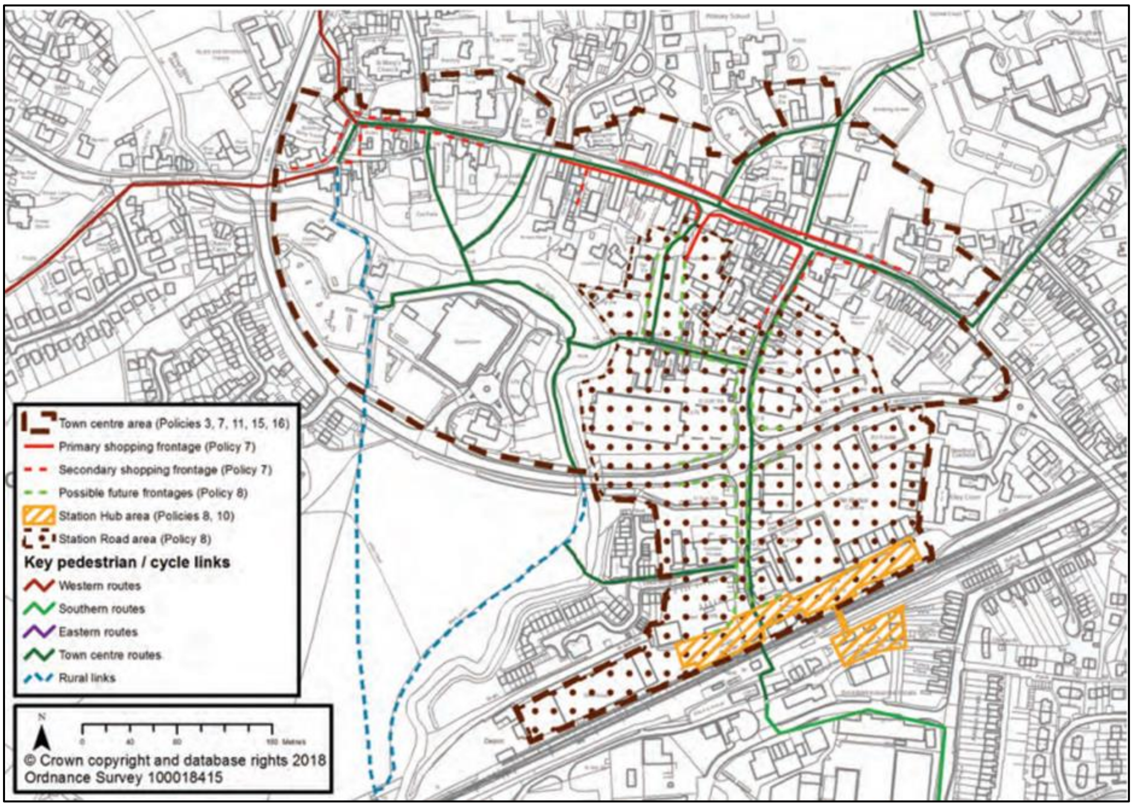


Figure 4: Excerpt of Gillingham Town Centre area Map

3.10 Figure 5 below sets out the boundary of Gillingham Town Centre in red with a 300m radius around it in yellow.

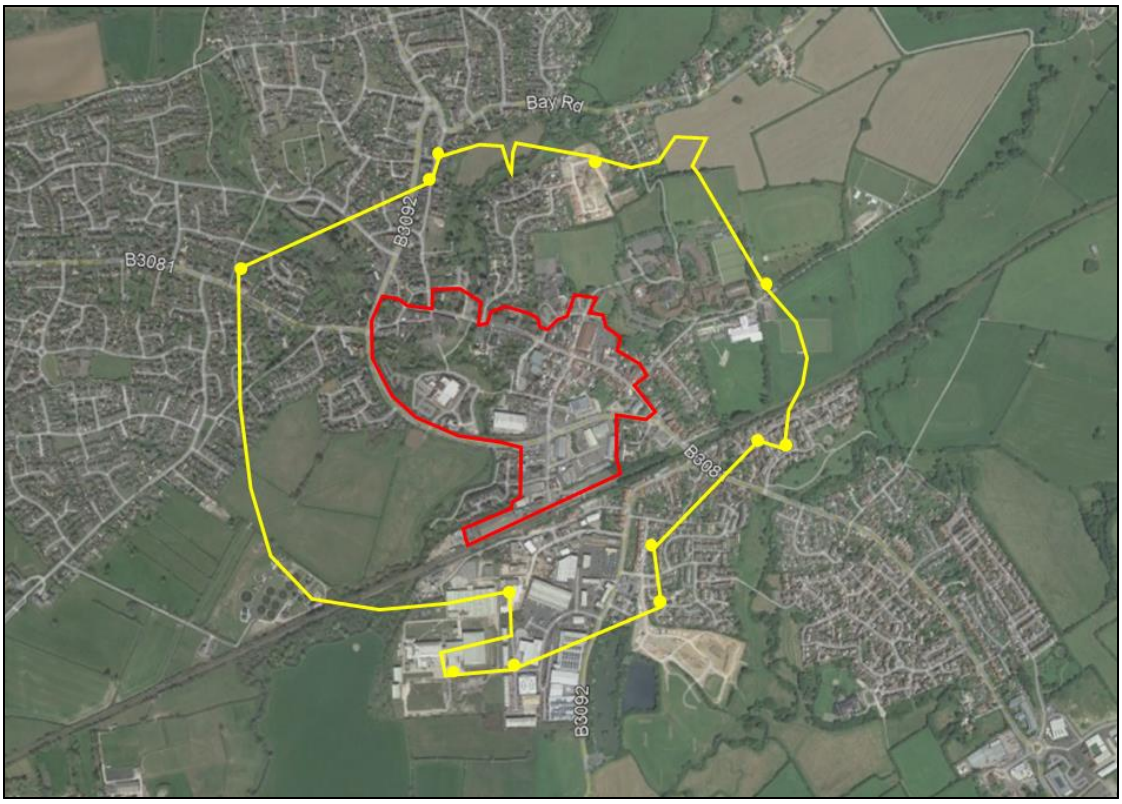


Figure 5: Gillingham Town Centre Area + 300m radius

Shaftsbury

3.11 Policy SFTC1 of the made Shaftsbury Neighbourhood Plan, defines the Town Centre Area and the Primary Shopping Frontage, as shown on the Shaftsbury town centre map. The Town Shopping is encircled by a continuous blue line and the Primary Shopping Frontage area is identified shaded in yellow.

3.12 An extract of Town Centre Map is shown in Figure 6 below.

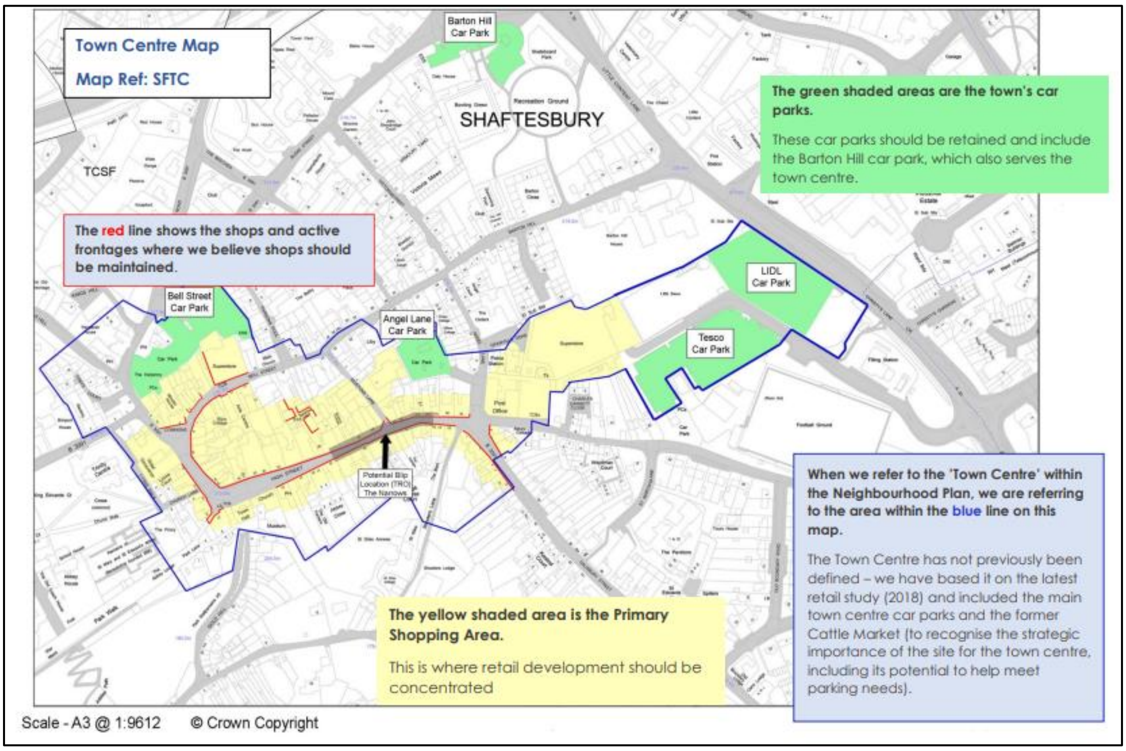


Figure 6: Extract of Shaftsbury Town Centre Area Map

3.13 Figure 7 below sets out the boundary of the Shaftsbury Town Centre in red with a 300m radius around it outlined in yellow.

Figure 7: Shaftsbury Town Centre Area + 300m radius

Sturminster Newton

3.14 Policy 15 entitled 'Improving the Town Centre' of the made Sturminster Newton Neighbourhood Plan defines the Town Centre Area and the Shopping Frontages Area, as shown on Map 11. The Town Centre Area is encircled by a continuous brown line and the Shopping Frontages Area is identified shaded in a broken brown line.

3.15 An extract of Town Centre area Map and Shopping Frontages Area is shown in Figure 8 below.

Figure 8: Extract of Town Centre Area

3.16 Figure 9 below sets out the boundary of the Sturminster Newton Town Centre Area in red with a 300m radius around it indicated in yellow.

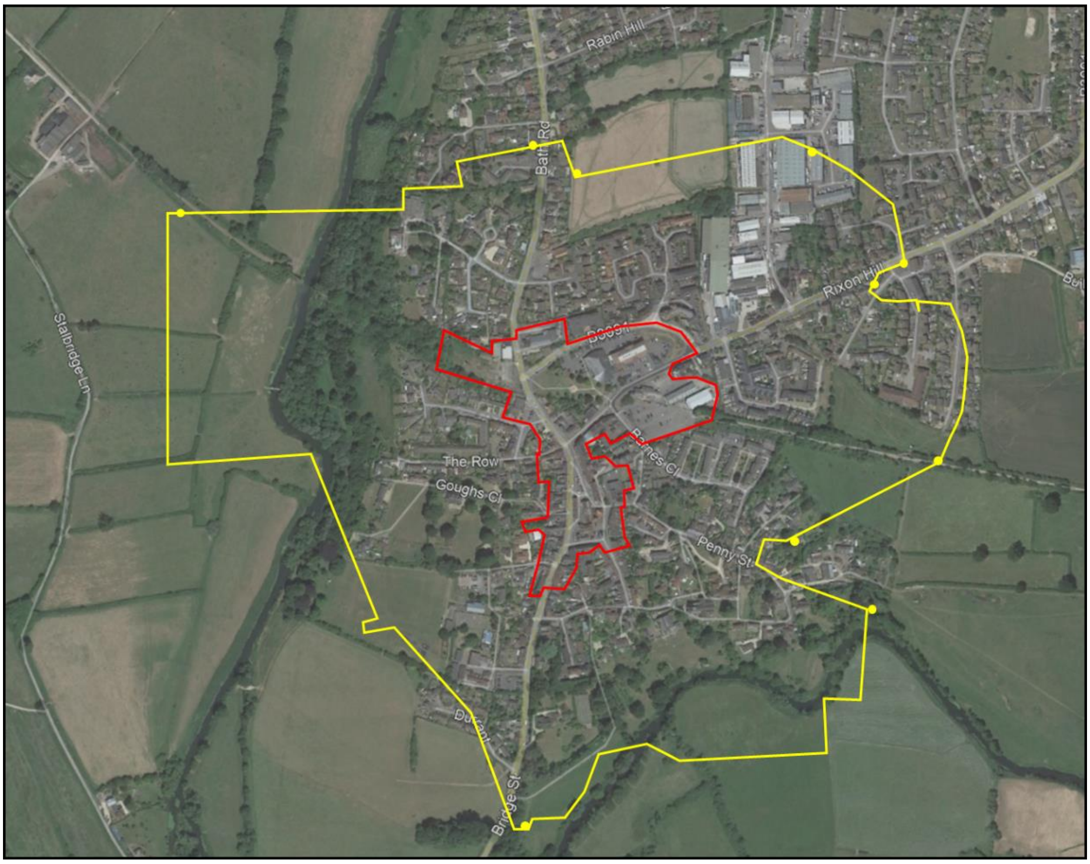


Figure 9: Sturminster Newton Town Centre Area + 300m radius

4 Methodology

4.1 As stated above, paragraph 92 of the NPPF confirms that both applicants and LPAs should demonstrate flexibility on issues such as format and scale. Flexibility may include, for example, providing the development over two or more levels. It does not, however, require the applicant to disaggregate separate parts of the business model. This position has been confirmed through the Tesco Stores Limited v. Dundee City Council Supreme Court Judgement (21st March 2012), which found that the key consideration is whether 'an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site' (paragraph 29).

4.2 The relevant question is therefore not whether there is a site *'suitable for meeting identified deficiencies in retail provision in the area'*, but whether there is a site 'suitable for the development proposed by the applicant'. This is supported by the appeal decision for Land at Vulcan Road, Sheffield (appeal ref: APP/J4423/A/13/2189893) dated 3rd July 2013, which confirms that the business model of the operator can be the key factor in the consideration of whether a site is suitable. The Mansfield judgment incorporates the degree of flexibility the judge regarded as reasonable.

4.3 Chapman Lily Planning has taken the above judgments into account in defining the parameters for assessing the suitability and availability of potentially sequentially preferable sites. In order to carry out the sequential assessment, it is necessary to identify the minimum site requirements for the proposed development as this assists the identification of reasonable alternatives. This included vacant premises and vacant sites. In this case the minimum site requirements are:

<u>Convenience Food Store (including in-store café and post office):</u>

- Minimum total floorspace of 1,455sqm with a minimum 814 tradable floor area (these figures assume a minimum space necessary to provide a strong range of stock and create a suitable offer to customers).
- Class E Use Class.
- 0.5ha site area.
- Mains services within close proximity to the site for economies of development.
- Comfortable relationship with neighbouring users.
- Dedicated parking, free parking.
- Appropriate access for loading and deliveries.

- Appropriate access to the food store taking account of the needs of customers with impaired mobility.

<u>Other retail/service units</u>

- Minimum total floorspace of 721sqm
- Class E Use Class.
- 0.2ha site area.
- Single storey building/s
- Mains services within close proximity to the site for economies of development.
- Comfortable relationship with neighbouring users.
- Dedicated parking, free parking.
- Appropriate access for loading and deliveries.
- Appropriate access to the retail/ service units taking account of the needs of customers with impaired mobility.

4.4 Due regard has been given to the following publications and data sources:

- Desktop survey;
- Survey of vacant premises and sites being actively marketed through commercial agents;
- Reports (press and Council) of under-utilised sites;
- The Council's Strategic Housing Land Availability Assessment;
- The Council's Brownfield register[2];
- Extant planning permissions and live applications;
- Allocations in the Development Plan: and
- A review of emerging Local Plan and Neighbourhood Plan policies.

4.5 Site suitability and availability have been given due consideration. With respect to suitability, this takes account of physical (such as size, topography, connectivity to the town); environmental (such as flood risk); and planning constraints. Planning encompasses both planning policy and development management, whereby a site's history or presence of an extant consent might dictate potential uses and / or indicate alternative use values. A 'policy-off' approach has been adopted in the first instance, with the purpose of any planning designations / allocations being subject to more in-depth scrutiny.

4.6 Availability relates to ownership (and degree of fragmentation); the presence of a willing and able vendor (or otherwise); terms; and market viability.

5 Assessment

Blandford Forum

5.4 We have undertaken an assessment of available and suitable premises and sites within Blandford Forum town centre, edge-of-town centre and out-of-centre areas to ascertain whether there are any premises or sites capable of accommodating the proposed mixture of uses. Tables 1, 2 and 3 provides a summary of the premises and the sites that we have considered.

Town centre

Desktop survey

5.5 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks. These car parks are well utilised. Many are located within the flood zone being loctated adjacent to the River Stour, and therefore not considered suitable. None of these car parks are being promoted for re-development. Other land parcels that appeared to be of an appropriate size were also investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.6 Our empirical survey identified four vacant premises being actively marketed in the town centre area that were available, as outlined below:

- 37B Salisbury Street. This unit is presently being marketed by Primer Olds B.A.S and falls under Class E use and has a GIA of 54 sqm, however it is too small for the proposed use and therefore is unsuitable.
- 9A Market Place. This unit is currently being marketed by Primer Olds B.A.S and falls under Class E use and has a GIA of 52 sqm, however it is too small for the proposed use and therefore is unsuitable.
- The former Kings Arms Hotel. This premises is being marketed by Blue Alpine and it has a Sui Genesis use and has a GIA of 513 sqm, however it is too small for the proposed use and therefore is unsuitable.
- 17 Market Place. This unit is currently being marketed by Blue Alpine and falls under Class E use space and has a GIA of 248 sqm, however it is too small for the proposed use and therefore is unsuitable.

5.7 In summary, all of the vacant premises currently being actively marketed are too small and are considered unsuitable by virtue of size.

The Council's Strategic Housing Land Availability Assessment

5.8 There is a single site identified in the Council's SHLAA in the town centre area.

- Land adjacent to Shorts Lane & Luton Mews (also identified on the Council's brownfield register). This site is considered unsuitable principally due to size being too small at 0.11 ha.

5.9 The site is considered unsuitable to accommodate the proposed use.

The Council's Brownfield register

5.10 Our search revealed one site identified on the Council's brownfield Register.

- Land adjacent to Shorts Lane & Luton Mews. This site is considered unsuitable principally due to size being too small at 0.11 ha

5.11 The site is considered unsuitable to accommodate the proposed use.

Extant planning permissions and live application

5.12 Our search revealed there are no extant planning permissions or live planning applications in the town centre area.

Allocations in the Development Plan

5.13 Our search revealed there are no allocations in the adopted Development Plan in the town centre area.

Neighbourhood Plan policies

5.14 No town centre sites have been allocated for retail/commercial.

A review of emerging Local Plan and

5.15 Our review of emerging Local Plan revealed no results.

Site No	Name	Source	Characteristics	Assessment Suitable	Available
1	Marsh and Ham car park	Map search	Sui genesis use class, within a conservation area and comprises of previously developed land Primarily serves the adjacent supermarket car parking requirement and town centre. This site is within an area at risk of flooding (adjacent to the river Stour) and ruled out in SHLAA	No	No
2	Langton Road car park	Map search	Sui genesis use class, within a conservation area and comprises of previously developed land Primarily serves the car parking requirement of the town centre. This is within an area at risk of flooding	No	No
3	Church Lane car park	Map search	Sui genesis use class, within a conservation area and comprises of previously developed land Primarily serves the car parking requirement of the town centre.	No	No
4	37B Salisbury Street	Rightmove	Class E use class, ground floor premises within a conservation area. The floor area is too small	No	Yes
5	9A Market Place	Rightmove	Class E use class, ground floor premises within a conservation area. The floor area is too small	No	Yes
6	The former Kings	Rightmove	Grade II listed building.used as hotel/public house within conservation area.	No	Yes

	Arms Hotel		This site is too small, heritage implications.		
7	17 Market Place	Rightmove	Class E use class, prominent former bank premises within a conservation area. Property benefits from rear access. This site is too small.	No	Yes
8	Shorts Lane & Luton Mews	SHLAA & on the Brownfield Land Register	Previously developed land within a conservation area. This site is too small at 0.11ha	No	No

Table 1: Town Centre Premises and Sites

Edge-of-centre

Desktop survey

5.16 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks, These car parksare well utilised being adjacent to residential dwellings. The car park is not being promoted for re-development. Other land parcels that appeared to be of an appropriate size were investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.17 Our empirical survey identified there were no vacant premises or sites being actively marketed in the edge-of-town area.

The Council's Strategic Housing Land Availability Assessment

5.18 There are one SHLAA sites in the edge of centre which are as follows:

- Blandford Brewery. This site is allocated for housing and has planning permission for residential development which is currently being built out.

5.19 The site, therefore, is considered unsuitable to accommodate the proposed use.

The Council's Brownfield register

5.20 Our search revealed there were no sites on the Council's Brownfield register in the edge-of-centre area.

Extant planning permissions and live application

5.21 Our search revealed there are no extant planning permissions or live planning applications in the edge-of-town area.

Allocations in the Development Plan

5.22 Our search revelated there are no allocations in the adopted Development Plan for the edge-of town area.

A review of emerging Local Plan and Neighbourhood Plan policies

5.23 Our review of emerging Local Plan and Neighbourhood Plan policies yielded no results.

Site No	Name	Source	Characteristics	Assessment Suitable	Available
10	Blandford Brewery	SHLAA	Previously developed land, former brewery building and associated buildings within a conservation area. Plannning permission for residential development is currently being built out	No	No

Table 2: Edge-of-centre Premises and Sites

Out-of-centre

Desktop survey and walkover survey

5.24 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks but as set out above, these are not considered suitable. Other land parcels that appeared to be of an appropriate size were investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.25 Our empirical survey identified no vacant premises currently being marketed in the out-of-centre area.

The Council's Strategic Housing Land Availability Assessment

5.26 Our search revealed there are three sites in the out-of-centre area.:

- Castleman House and Bungalow site. This site extends to circa 0.56 ha and is identified as a site suitable for housing development with developable area of 0.46ha. Access is from Fairfield Bungalows or Peel Close. Owned by Council.
- Blandford Day Centre. This site is 0.28ha. Is identified as being suitable for housing development. Notes say only developable subject to day centre being surplus to requirements as development plan policy seeks to protect non-commercial community facilities such as the day centre located on this site. Owned by Council. Nordon Council Offices Site. This site has now been built out for housing, therefore not suitable or available.

5.27 In summary, the first two sites are not considered to be a reasonable alternative due to size of the developable site being under 0.5ha due to tree constraints; sites identified suitable for housing. Site is owned by the Council and currently in use as a community facility.

The Council's Brownfield register

5.28 Our search of the Council's brownfield land register identified there are two premises or sites in the out-of-town area.

- Castleman House and Bungalow Site
- Blandford day centre

5.29 Both of these flats also appear in the SHLAA and have been already been discounted.

Extant planning permissions and live application

5.30 Our search of extant planning permissions and live application in the out-of-centre area yielded no results.

Allocations in the Development Plan

5.31 Our search revealed there are no allocations in the adopted Development Plan in the out-of-centre area.

A review of Neighbourhood Plan policies

5.32 Our review of Neighbourhood Plan policies revealed no results.

A review of emerging Local Plan policies

5.33 Our review of Neighbourhood Plan policies revealed no results.

Site No	Name	Source	Characteristics	Assessment Suitable	Available
11	Castleman House and Bungalow	SHLAA	C2 use class, previously developed land ………….. Potential restricted access for service vehicles.	No	No
12	Blandford Day Cenrre	SHLAA	Day centre in Class E (f), previously developed land. Currently in a community use- policy resistance to loss of a community use.	No	No
13	Nordon Council Offices	SHLAA	Site had now been redeveloped to residential	No	No

Table 3: Out-of-centre Premises and Sites

Gillingham

5.33 We have undertaken an assessment of available and suitable premises and sites within Gillingham town centre, edge-of-town centre and out of centre zones to ascertain whether any of these sites are capable of accommodating the proposed use. Tables 4, 5 and 6 provides a summary of the premises and the sites that we have considered.

Town centre

Desktop survey

5.34 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks. There are a number of well utilised car parks in the town centre, however as they are not currently for sale they are not considered suitable. Other land parcels that appeared to be of an appropriate size were investigated

Survey of vacant premises and sites being actively marketed through commercial agents

5.35 Our empirical survey of vacant premises and sites identified that there are two vacant premises and sites in the town centre area as follows:

- Former Rose's Yard and Premises. This site is currently being marketed by Chesters Harcourt as a redevelopment site, extending to circa 0.2ha. Full planning permission (F/FUL/2022/02984) has been granted for the erection of 17no dwellings & flexible commercial space (use class E). This site is part of a wider site 3.77ha which is allocated for 'comprehensive mixed use development' in the GNP.
- Bracher House, Newbury. This is presently being marketed by Chaffers and falls under Class E use and has a GIA of 117 sqm, however it is too small for the proposed use and therefore is unsuitable.
- Former Joubere Premises, Station Road. This site is being marketed by Symonds & Sampson. The site area is 0.29 ha. The site area is slightly larger than that required for the small class E uses. This site is part of a wider site 3.77ha which is allocated for 'comprehensive mixed use development' in the GNP.

5.36 In summary, the Former Roses Yard and Former Joubere premises fall within part of a wider site earmarked for 'comprehensive mixed use development' in the Gillingham Neighbourhood Plan (GNP). Whilst either site would be of a size capable of accommodating the class E uses proposed, if located with Gillingham they would not serve the existing and future residents of Marnhull and wouldn't reduce the need to travel which is the aims of this proposal.

The Council's Strategic Housing Land Availability Assessment

5.37 There are three SHLAA sites in the town centre area. These are:

- The former Co-Op store. This site has planning permission (ref: P/FUL/2022/02397), granted at appeal, for the *'Demolition of existing former co-op store & redevelopment of the site to provide 42no. residential units, comprising 4no. houses (C3), 30no. apartments (C3) and 8no. assisted living apartments (C2), 83sqm of commercial space (Class E) allotments, landscaping & other associated works'.* The site is presently being built out. This site, therefore, cannot be regarded to be a suitable alternative site.
- Lloyds Bank. This site has planning permission for the *'Erection of three storey residential block of 3no. apartments 1no. commercial unit & a two storey detached block of 3no. apartments to the rear with associated parking, landscaping and refuse collection/cycle storage'* granted. The site measures circa 0.17 ha, therefore, is it not considered to be a suitable alternative for the proposed use.
- Station Road (Lower). Total site area is 3.86ha. Town centre uses including retail units, cafés / restaurants, a modern hotel, office & informal recreation together with housing is anticipated as part of a comprehensive redevelopment as set out in the GNP. Part of the site is in Flood zone 2.

5.38 These sites could not be considered a reasonable alternative for the reasons set out above and as set out above.

The Council's Brownfield register

5.39 Our search of the Council's Brownfield Land Register identified there are two sites within the town centre area – The Former Co-Op store, Lloyds Bank and Lower Station Road. As previously set out above, both of these sites are not considered as suitable alternative for the proposed use.

Extant planning permissions and live application

5.40 Our search revealed there are no extant planning permissions or live planning applications in the town centre area.

Allocations in the Development Plan

5.41 Our search revealed there were no allocations in the Development Plans in the Town Centre area.

A review of Neighbourhood Plan policies

5.42 Our review of Neighbourhood Plan policies revealed policy 8 is seeking 'comprehensive' redevelopment of the Station Road area are for a mixed use scheme.

A review of emerging Local Plan policies

Our review of emerging Local Plan policies revealed no results.

Site No	Name	Source	Characteristics	Assessment Suitable	Available
18	High Street Car Park	Map Search	Sui genesis use class, within a conservation area and comprises of previously developed land	No	No
19	Chantry Fields Car Park	Map Search	Sui genesis use class, within a conservation area and comprises of previously developed land. Site liable to flooding due to proximity to the river.	No	No
20	Chantery Fields	SHLAA	Agricultural fields Heavily treed around site edges, whole site is subject to a TPO. Substantial areas of the site are at flooding. Flood Risk Zone 2, 3 & 3b modelled. The site is potentially affected by flooding from other sources including from surface water and reservoir flooding.	No	No

21	Former Rose's Yard and Premises	Rightmove	Sui genesis use class, within a conservation area and comprises of previously developed land. Planning permission for residential development	No	Yes
22	Bracher House	Rightmove	Class E use class, previously developed land	No	Yes
23	Former Co-Op store	SHLAA	Previously developed land, prominent former retail premises, planning permission for residential development which is being built out.	No	No
24	Lloyds Bank	SHLAA	Previously developed land, prominent retail premises,	No	No

Table 4: Town centre Premises and Sites

Edge-of-centre

Desktop survey

5.43 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks but as set out above, these are not considered suitable. Other land parcels that appeared to be of an appropriate size were investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.44 Our empirical survey of vacant premises and sites identified that there are no vacant premises and sites in the edge-of-centre area.

The Council's Strategic Housing Land Availability Assessment

5.45 There are two SHLAA sites in the edge-of-centre which are as follows:

- Adult Learning Centre and St Martins Residential Home. This site is allocated for housing and comprises of a recently built out extra care housing development. It is therefore not considered to be a reasonable alternative for the proposed use.

- Churchbury House, Queen Street. This site extends to circa 0.037ha and is allocated for housing. Planning permission was granted for *'Change of use and extension of office building to form 8 no. dwellings (C3) (demolish existing rear extension).'.* This followed with a Non-material amendment application for changes to the extension, internal layout, fenestration and cycle parking planning permission P/FUL/2021/04280 that was granted in April 2024. Furthermore, this site is currently being built out. The site area is too small. It is therefore not considered to be a reasonable alternative for the proposed use or available.
- Land at Barnaby Mead. This site is 0.62ha (dev area). Outline planning permission P/2021/02187 for 'Develop land by the erection of up to 20 No. dwellings, form vehicular access and associated infrastructure. (Outline application to determine access)' approved in April 2024. This site it too large
- Loden Farm and Loden House Site is 0.19ha. Listed building on site. Site is too small.

5.46 In summary, all these sites are not considered to be a reasonable alternative due to size as site-specific designations and are identified suitable for housing and have planning permission for residential development an or have been built out.

<u>The Council's Brownfield register</u>

5.47 Our search of the Council's Brownfield Land Register identified there are two sites within edge-of-centre area - Adult Learning Centre and St Martins Residential Home and Churchbury House. Neither of these sites could be considered a reasonable alternative for the reasons set out in the above paragraphs.

<u>Extant planning permissions and live application</u>

5.48 Our search revealed there are no extant planning permissions or live planning applications in the edge-of-centre area.

<u>Allocations in the Development Plan</u>

5.49 There are site allocations in the Development Plan on the northern and southern sides of the town centre which are allocated for housing and employment and are built out, therefore are not considered reasonable suitable alternative sites.

<u>A Review of Niehbourhood Plan policies</u>

5.50 Our review of Neighbourhood Plan policies revealed no results.

Review of emerging Local Plan policies

5.51 Our review of emerging Local Plan policies revealed no results.

Site No	Name	Source	Characteristics	Assessment Suitable	Available
25	Adult Learning Centre and St Martins Residential Home	SHLAA; brownfield register	Previously developed land, planning permission for residential development (extra care) which has been built out.	No	No
26	Churchbury House	SHLAA; brownfield register	Previously developed land, planning permission for residential development	No	No

Table 5: Gillingham edge-of-centre Premises and Sites

Out-of-centre

Desktop survey and walkover survey

5.50 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks, these are not considered suitable are they are not currently being marketed. Other land parcels that appeared to be of an appropriate size were investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.51 Our empirical survey identified that there are no vacant premises or sites that are currently being marketed in the out-of-centre area.

The Council's Strategic Housing Land Availability Assessment

5.52 There are several included SHLAA sites in the out-of-centre area. These are as follows:

- Woodwater Farm. The site extends to circa 76.68ha is located within flood zone 2 and a number of Public Rights of Way (PRoW) bisect the site. The SHLAA identified that the site is unsuitable for the built development and concluded that the site was an unsuitable site. It is therefore not considered to be a reasonable alternative for the proposed use.

- Purns Mill and land to the east of B3092. The site extends
  to circa 20.02ha, is situated in flood zone 2 and contains a Grade II listed building as well sections of the site are located in a conservation area. The SHLAA concluded that the site was unsuitable. It is therefore not considered to be a reasonable alternative for the proposed use.
- Bowridge Hill, land north of Bay Road. The site extends to circa to 35ha, is located in flood zone 2 and there are a number of TPOs alongside the site's boundaries while a power lines bisect the site. The site also lies within a conservation area. It is therefore not considered to be a reasonable alternative for the proposed use.
- Land to the west of Colesbrook Farm. The site extends to circa 2ha and lies within a conservation area. The SHLAA concluded that the site is an unsuitable site.
- Land North of Wavering Lane. The site is extends to circa 9.8ha and located in flood zone 2. The west western half of the site is allocated for sports pitch provision in the Adopted Local Plan and Neighbourhood Plan. The SHLAA concluded that the site was an unsuitable site. It is therefore not considered to be a reasonable alternative for the proposed use.
- Land south of Bay Road. The site extends to circa 26.63, is situated in flood zone 2 and is contains a scheduled monument. The SHLAA concluded that the site was an unsuitable site. It is therefore not considered to be a reasonable alternative for the proposed use.
- Land east of Madjeston. The site extends to circa 5ha, is located within flood zone 2. The SHLAA concluded that the site was an unsuitable site. It is therefore not considered to be a reasonable alternative for the proposed use.
- Land west of Pound Lane. The site extends to circa 1.7ha and contains a Grade II listed building and is included in the Dorset Gardens Trust Local List as part of the Wyke Hall site. The SHLAA concluded that the site was an unsuitable site. It is therefore not considered to be a reasonable alternative for the proposed use.

5.53 In summary, all these sites are not considered to be a reasonable alternative due to size as site-specific designations and are considered as unsuitable.

Extant planning permissions and live application

5.54 Our search revealed that there are no extant permissions or live applications within the out-of-centre area.

Allocations in the Development Plan

5.55 There are site allocations in the adopted Development Plan on the northern and southwestern sides of the town centre which are allocated for housing and employment as well as are built out, therefore these are not considered reasonable suitable alternative sites to the proposed use.

A review of emerging Local Plan and Neighbourhood Plan policies

5.56 Our review of emerging Local Plan and Neighbourhood Plan policies revealed no results.

Site No	Name	Source	Characteristics	Assessment Suitable	Available
27	Woodwater Farm	SHLAA	Previously developed land. Excluded from the SHLAA on flooding grounds	No	No
28	Purns Mill and land to the east of B3092	SHLAA	Greenfield site. Excluded from the SHLAA on heritage and flooding grounds	No	No
29	Bowridge Hill, land north of Bay Road	SHLAA	Previously developed land. Flooding, TPO and heritage constraints	No	No
30	Land to the west of Colesbrook Farm	SHLAA	Previously developed land Excluded from the SHLAA on heritage and flooding grounds	No	No
31	Land south of Bay Road	SHLAA	Greenfield site. Excluded from the SHLAA on heritage and flooding grounds	No	No
32	Land east of Madjeston	SHLAA	Previously developed land. Excluded from the SHLAA on heritage and flooding grounds	No	No
33	Land west of Pound Lane	SHLAA	Previously developed land. Excluded from the SHLAA on heritage and flooding grounds	No	No

Table 5: Gillingham out-of-centre premises and sites

Shaftsbury

5.57 We have undertaken an assessment of available and suitable premises and sites within Shaftesbury town centre, edge-of-town centre and out of centre zones to ascertain whether any of these sites are capable of accommodating the proposed use. Tables 6 and 7 provides a summary of the premises and the sites that we have considered.

Town centre

Desktop survey

5.58 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks, these are not considered suitable are they are not currently being marketed. Other land parcels that appeared to be of an appropriate size were investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.59 Our empirical survey identified two vacant premises actively being marketed as follows:

- The Old School House. This property is currently being marketed by Boatwrights and falls under Class E and has a GIA of 43 sqm, however it is too small for the proposed use and therefore is unsuitable.
- 44-46 High Street. This unit is currently being marketed by Symonds and Sampson and falls under Class E and has a GIA of 92 sqm, however it is too small for the proposed use and therefore is unsuitable.
- 1 Bell Street. This unit is currently being marketed by Gerrald and Matthews and has a GIA of 56-91 sqm, however it is too small for the proposed use and therefore is unsuitable.
- 27A High Street. This unit is currently being marketed by Wooley and Wallis and has a GIA of 47 sqm, however it is too small for the proposed use and therefore is unsuitable.

5.60 In summary, all of the vacant premises are too small to accommodate the proposed mixture of uses on the site even alone or when combined, therefore, are considered suitable by virtue of size.

The Council's Strategic Housing Land Availability Assessment

5.61 Our search revealed there is one site on the Council's SHLAA in the town centre, ATS Garage. This site has planning permission (ref: 2/2016/0629/FUL) to '*Demolish existing ATS garage, erect 28 No. sheltered apartments for the elderly including communal facilities, access, car* *parking and landscaping'* granted on 3rd November 2017. It is currently being built out. This site, therefore, can not be regarded to be a suitable alternative site.

The Council's Brownfield register

5.62 Our search revealed there is one site on the Council's Brownfield register in the town centre, ATS Garage. Planning permission (ref: 2/2016/0629/FUL) to 'Demolish existing ATS garage, erect 28 No. sheltered apartments for the elderly including communal facilities, access, car parking and landscaping' granted on 3rd November 2017. The site has commenced. This site, therefore, cannot be regarded to be a suitable alternative site to the proposed use.

Extant planning permissions and live application

5.63 Our search revealed there are no extant planning permissions and live applications in the town centre area.

Allocations in the Development Plan

5.64 Our search revealed there are no allocations in the adopted Development Plan in the town centre area.

Review of emerging Local Plan and Neighbourhood Plan policies

5.65 Our review of the emerging Local Plan and Neighbourhood Plan policies revealed no results.

Site No	Name	Source	Characteristics	Assessment	
				Suitable	Available
34	Bell Street Car Park	Map search	Previously developed land and within a conservation area	No	No
35	Angel Lane Car Park	Map search	Previously developed land and within a conservation area	No	No
36	The Old School House	Rightmove	Grade II Listed Building. Prominent central trading position within a Conservation area	No	Yes
38	44-46 High Street	Rightmove	Prominent central trading position, retail premises within a conservation area	No	Yes
39	1 Bell Street	Rightmove	Prominent central trading position, retail premises within a conservation area	No	Yes

40	27A High Street	Rightmove	Prominent central trading position, retail/office premises within a conservation area	No	Yes
41	ATS Garage	SHLAA ,brownfield register and marketed by Savills	Prominent central trading position, retail/office premises within a conservation area. Previously developed land. Planning permission for older persons' accommodation. This development has commenced through the clearing of the site. Site is currently under offer on the Savills website.	No	No

Table 6: Shaftsbury town centre premises and sites

Edge-of-centre

Desktop survey and walkover survey

5.66 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks, these are not considered suitable are they are not currently being marketed. Other land parcels that appeared to be of an appropriate size were investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.67 Our empirical survey identified no premises actively being marketed in the edge-of-centre area.

The Council's Strategic Housing Land Availability Assessment

5.68 Our search revealed there are no sites identified on the Council's SHLAA in the edge-of-centre area.

The Council's Brownfield register

5.69 Our search revealed there are no sites on the Council's Brownfield register in the edge-of-centre area.

Extant planning permissions and live application

5.70 Our search revealed there are no extant planning permissions or live applications in the edge-of-centre area.

Allocations in the Development Plan

5.71 Our search revealed there are no allocations in the adopted Development Plan in the edge-of-town area.

Review of emerging Local Plan and Neighbourhood Plan policies

5.72 Our review of the emerging Local Plan and Neighbourhood Plan policies revealed no results.

Out-of-centre

Desktop survey and walkover survey

5.73 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks, these are not considered suitable are they are not currently being marketed. Other land parcels that appeared to be of an appropriate size were investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.74 Our empirical survey identified no premises actively being marketed in the out-of-centre area.

The Council's Strategic Housing Land Availability Assessment

5.75 There are various SHLAA sites in the edge-of-centre zone which are as follows:

- Land adjacent Enmore Court. The site is 1.2ha. Outline planning permission for 23 affordable homes granted on appeal in September 2021. A reserved matters application P/RES/2024/05119 is currently being considered by the Council. This site, is too large and is not available.
- Land at Higher Blandford Road. The site area is 1.8ha. There have been a number of planning applications approved on this site for residential development. There is currently an application (P/MPO/2024/01049) under consideration by the Council for modifications to the S.106. This site, too large, is under construction and is not available

- Land off Wincombe Lane. The site area is 4.6ha. Planning permission granted for residential development. Non material amendment recently approved. This site, is too large and is not available.
- Land south of Wincombe Lane. Site area is 3.72ha. The site is too large.
- Land to the east of the A350. Planning permission allowed on appeal for residential development in February 2024. The site, is to large and is not available.
- Blackmore Vale. Site area is 1.7ha. Access constraints due to Wimcombe Lane and the reserved bypass corridor. The existing business is well established at this location. Site also exposed to open countryside / AONB. The site is to large and not available.

5.76 With the above considered and site-specific constraints, neither of these sites can be considered a reasonable alternative to the proposed use.

<u>Extant planning permissions and live application</u>

5.77 Our search revealed there are no extant planning permissions and live applications in the out-of-town area.

<u>Allocations in the Development Plan</u>

5.78 At set out previously, there are a group of sites located on the eastern side of the town which are identified in the North Dorset Local Plan for mixed use development which are currently being built out.

<u>A review of emerging Local Plan and Neighbourhood Plan policies</u>

5.79 Our review of the emerging Local Plan and Neighbourhood Plan policies revealed no results.

Site No	Name	Source	Characteristics	Assessment	
				Suitable	Available
42	Land adjacent Enmore Court	SHLAA	Planning consent for residential development. Reserved matters application P/RES/2024/05119 is currently being considered by the Council	No	No
43	Land south of Wincombe Lane	SHLAA	Greenfield site. Land inside the settlement boundary is allocated for residential in the North Dorset Local Plan (2003). Land outside the SB is allocated for the eastern bypass corridor.	No	No

44	Land off Wincombe Lane	SHLAA	Planning permission for residential development being built out. Non material amendment recently granted planning consent.	No	No
45	Land north of Mampitts Lane	SHLAA	Greenfield site. Area of TPO on southern half of site. Area TPO on southern half of site. Another area TPO at NE corner. Mature trees / hedgerows on field perimeters. Land reserved for outer bypass runs north-south through site. 4.85 ha	No	No
46	Land south of Mampitts Lane and north of Salisbury Road (A30)	SHLAA	Greenfield site. Outer bypass corridor reservation running north-south along the western side of site. 4.38ha	No	No
47	Wessex Sale ground, north of Salisbury Road	SHLAA	Reserved bypass corridor along western edge - severs links to the town. Careful consideration needs to be given to access arrangements and whether it is appropriate to build on the eastern side of the SUDs and proposed bypass corridor. This site was ruled out for housing. 4.3ha	No	No
48	Land south of Salisbury Road	SHLAA	Although site to the west has permission for residential development, the land to the south and east is allocated for employment (B use class), and so	No	No

			any development needs to be compatible with that use. Site would be suitable for commercial or employment redevelopment. Site area 0.99ha		
49	Salisbury Road	SHLAA	Previously development land. An allocated employment site. Flooding and arboricultural constraints. 8.5ha	No	No
50	Blackmore Vale Farm	SHLAA	Greenfield site. Identified suitable for housing subject to a policy change Access constraints due to Wimcombe Lane and the reserved bypass corridor. The existing business is well established at this location. Site also exposed to open countryside / AONB.	No	No
51	Land at Higher Blandford Road	SHLAA	Former greenfield site. Planning permission for residential development. Currently being built out	No	No
52	Land to the east of the A350	SHLAA	Former Greenfield site. Planning permission allowed on appeal for residential development in February 2024. The site, is to large and is not available.	No	No

Table 7: Shaftsbury out-of-centre premises and sites

Sturminster Newton

5.80 We have undertaken an assessment of available and suitable premises and sites within Sturminster Newton town centre, edge-of-town centre and out-of-centre areas to ascertain whether any of these are capable of accommodating the proposed use. Tables 9, 10 and 11 provides a summary of the premises and the sites that we have considered.

Town Centre

Desktop Survey

5.81 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks, namely Station Road car park, which is considered under the SHLAA heading.

Survey of vacant premises and sites being actively marketed through commercial agents

5.82 Our empirical survey identified there is two vacant premises being actively marketed for rent or sale.

- Former British Legion site. The site has planning permission in principle for residential development. The site is for sale. The site area is 0.16ha which is not of a scale to be considered a reasonable alternative.
- No. 4 The Parade (ground floor) is available for rent. The floor area is 0.006ha which is not of a scale to be considered a reasonable alternative.

The Council's Strategic Housing Land Availability Assessment

5.83 There are four SHLAA sites in the town centre area which are as follows:

- Clarkes Yard. This site has planning permission for residential development (ref: 2/2016/0788/OUT and ref: P/RES/2021/00696 and a current planning application for 28 dwellings is under consideration by the Council). The developable site area is 0.4ha and is not of a scale to be considered a reasonable alternative.
- Sturminster Newton Library. This site at 0.1ha is not of a scale to be considered a reasonable alternative.
- Former livestock market site & railway gardens. This site is allocated for housing in the SNNP. This site at 0.19ha is not of a scale to be considered a reasonable alternative.
- Former Creamery and Car Park, Station Road. This site at 0.6ha is too large to be considered a reasonable alternative. The site isn't being actively marketed and has a mix of ownerships both Council and private and includes a flat with a 99 year lease

from 1987 and a further lease on site of Gas Governor

of 99 years from 1981. The car park is fully operational. It would take time to assembly the land for development. The policy in the SNNP is looking for mixed development housing and retail/commercial across 2.5 to 3 storeys.

5.84 None of these sites are considered to be reasonable alternatives because they are either too small, are permissioned for residential development, allocated for housing, not available and wouldn't meet the aspirations of the SNNP policy.

The Council's Brownfield Register

5.85 The sites Clarkes Yard, Former livestock market site & railway gardens, Former Creamery and Car Park and the Sturminster Newton Library, were all identified on the Council's Brownfield register. As set out above, none of these sites are considered to be reasonable alternatives.

Extant Planning Permissions and Live Applications

5.86 Our search revealed there are no extant planning permissions or live planning applications in the town centre area, other than Clarkes Yard which has already been discussed, therefore there no reasonable alternatives to the proposal.

Allocations in the Development Plan

5.87 The Former Creamery and Car Park site is allocated in the North Dorset Local Plan. As set out above this site is not considered to be a reasonable alternatives to the proposed use.

A review of Neighbourhood Plan policies

5.88 Our review of Neighbourhood Plan revealed Policy 20 Station Road, this states:

Proposals for the mixed-use development of the Station Road area (as identified on Map 10 area 2) will be supported provided they deliver all of the following key outcomes. If comprehensive development is not possible, the design and layout of any partial scheme of redevelopment must not prejudice the development potential of the residual site to achieve the remaining outcomes.

> Creation of a large outdoor motor traffic-free public plaza in the area where Station Road, the Trailway and The Exchange are located, to provide a focus for town events and other functions and to assist the further development of the town as a social and cultural destination. This should be designed so that it could provide an alternative location for a larger outdoor market

> A mix of retail and service uses, particularly at ground floor level, in classes A1-A5, to provide a new shopping frontage facing onto the Plaza, Station Road and the link with Barnes Close, with residential, office or business uses on upper floors, to provide a degree of public surveillance at all times > Public conveniences, cycle parking provision and at least the equivalent amount of publicly accessible car park spaces as there are today, to meet the needs of visitors and businesses

operating in the town centre, and users of the Trailway. These should be provided within the site, although an element may be relocated (provided these would be conveniently sited where they would continue to serve the town centre and Trailway)

> The extension of The Trailway through the site, along the line of the former railway, and a link connecting the Jubilee Path with Lovers Lane.

The general mix of uses may include other main town centre uses and residential uses, where these would be compatible with neighbouring uses and not undermine the above outcomes.

The layout of the development should provide positive street frontages with ancillary areas and functions such as service yards to the rear, to avoid detracting from the public realm. The design and layout should emphasise the 'arrival points' for visitors and create clear visual and functional links from these points to and from the connecting routes with the historic part of the town centre that are safe, convenient and attractive.

Building heights will be generally 2-2.5 storeys with occasional 3 storey buildings where appropriate to provide architectural emphasis. The positioning, scale and design of buildings should ensure a view of Hambledon Hill could still be enjoyed from the majority of the Railway Gardens. The design of buildings facing The Exchange and the public plaza should be of suitably high-quality materials and detailing. The public realm and buildings fronting onto the line of the former railway should also indicate the importance of the site as the former railway station area, and its role in the town's historic development.

Development of the Station Road area would benefit from the preparation of a Planning and Development Brief.

A review of emerging Local Plan policies

5.89 Our review of the emerging Local Plan and Neighbourhood Plan policies revealed no results.

Site No	Name	Source	Characteristics	Assessment Suitable	Available
53	No. 4 The Parade	Rightmove	Vacant ground floor for rent (existing E use class) Within a conservation area Floor area is 0.006ha which is too small for the proposal.	No	Yes
54	Clarkes Yard	SHLAA; brownfield register	Site has planning permission for residential development and there is a current planning	No	No

			application being considered for residential development. Site is 0.4ha which is too small for the proposal.		
55	Former Creamery and Car Park, Station Road	SHLAA, brownfield register	Used as car park drawing in revenue for town council. The site isn't being actively marketed and has a mix of ownerships both Council and private and includes a flat with a 99 year lease from 1987 and a further lease on site of Gas Governor of 99 years from 1981. The car park is fully operational. It would take time to assembly the land for development. The policy in the SNNP is looking for mixed development housing and retail/commercial across 2.5 to 3 storeys	No	No
56	Former livestock market site & railway gardens	SHLAA, brownfield register	Previously developed land Site allocated for housing in the SNNP Site is 0.19ha which is too small for the proposal.	No	No
57	Sturminster Newton Library	SHLAA, brownfield register	Existing F1 use class. Previously developed land. Large building in conservation area. Inadequate access off Brinsley Close. Site is 0.1ha which is too small for the proposal.	No	No
58	Royal British Legion Club	Dorset Council planning portal & advertised via	Previously development land with planning permission for residential development	No	Yes

		commercial agent	Site is 0.16ha which is too small for the proposal.		

Table 9: Sturminster Newton town centre premises and sites

Edge-of-centre

Desktop survey

5.89 Aerial photographs and the Council's policies map was analysed. Land parcels that appeared to be of an appropriate size were investigated- none were found.

Survey of vacant premises and sites being actively marketed through commercial agents

5.90 Our empirical survey for the edge-of town centre area identified no premises or sites being currently actively marketed for rent or sale. None were found.

The Council's Strategic Housing Land Availability Assessment

5.91 There are two SHLAA sites in the edge-of-centre area which are as follows

- Market Fields. This site is larger than the proposal and is allocated in the SNNP for residential development as well is the subject of a planning application for the '*Erection of 86no. dwellings, formation of access, green space & associated infrastructure'* (P/FUL/2023/06986) which is pending consideration.
- Hammonds Yard. This site is 0.14 ha and too small to be considered a reasonable alternative. This site is allocated in the SNNP for residential development.

5.92 Neither of these sites are considered to be reasonable alternatives because they are either too small, or are allocated for housing.

The Council's Brownfield register

5.93 Hammonds Yard is on the Council's brownfield register within the edge of-centre area.

Extant planning permissions and live application

5.94 Our search revealed there are no extant planning permissions or live planning applications for retail use in the edge-of-town area.

Allocations in the Development Plan

5.95 There are an allocation in the edge-of-centre area which are as follows

- Land north of Livestock Market. As set above this site is allocated for housing in the Sturminster Newton Neighbourhood Plan for residential development

5.96 In summary, this site is not considered to be reasonable alternative to the proposed use due to size and are allocated for housing.

A review of emerging Local Plan and Neighbourhood Plan policies

5.97 Our review of emerging Local Plan and Neighbourhood Plan policies revealed no results.

Site No	Name	Source	Characteristics	Assessment Suitability	Availability
59	Market Fields	SHLAA	Greenfield site within urban area, allocated for housing in SNNP, live planning application for residential developmeny.	No	No
60	Hamonds Yard	SHLAA	Previously developed land, allocated for housing in SNNP, Site 0.14ha is too small for the proposal.	No	No

Table 10: Sturminster Newton edge-of-town premises and sites

Out-of-centre

Desktop survey

5.98 Aerial photographs and the Council's policies map was analysed. This led to further investigation into car parks, however, they are not currently being marketed and are not considered suitable or available. Other land parcels that appeared to be of an appropriate size were investigated.

Survey of vacant premises and sites being actively marketed through commercial agents

5.99 Our empirical survey for the out-of-centre area identified no premises or sites being currently actively marketed for rent or sale.

The Council's Strategic Housing Land Availability Assessment

5.100 There are no sites identified in the Council's SHLAA in the out-of-town area (within the built up area)

The Council's Brownfield register

5.101 There are no premises or sites on the Council's Brownfield register within the out-of-centre area.

Extant planning permissions and live application

5.102 This source yielded no results.

Allocations in the Development Plan

5.103 Our search revealed there are no allocation in the adopted Development Plan in the out-of-town area.

A review of emerging Local Plan and the Neighbourhood Plan policies

5.104 Our review of emerging Local Plan and Neighbourhood Plan policies revealed no results.

6 Conclusion

6.1 The Retail Sequential Test (RST) has been carried out in line with the requirements of the NPPF and as governed by case law. It has involved looking for suitable alternative and accessible sites that could feasibly accommodate the following minimum requirements.

Convenience Food Store (including in-store café and post office):

- Minimum total floorspace of 1,455sqm with a minimum 814 tradable floor area (these figures assume a minimum space necessary to provide a strong range of stock and create a suitable offer to customers).
- Class E Use Class.
- 0.5ha site area.
- Mains services within close proximity to the site for economies of development.
- Comfortable relationship with neighbouring users.
- Dedicated parking, free parking.
- Appropriate access for loading and deliveries.

- Appropriate access to the food store taking account of the needs of customers with impaired mobility.

<u>Other retail/service units</u>

- Minimum total floorspace of 1,455sqm with a minimum 814 tradable floor area (these figures assume a minimum space necessary to provide a strong range of stock and create a suitable offer to customers).
- Class E Use Class.
- 0.2ha site area.
- Mains services within close proximity to the site for economies of development.
- Comfortable relationship with neighbouring users.
- Dedicated parking, free parking.
- Appropriate access for loading and deliveries.
- Appropriate access to the food store taking account of the needs of customers with impaired mobility.

6.2 The assessment began with a search of town centre sites, followed by edge-of centre and finally out-of-centre sites. It has found that physical constraints / planning constraints / availability are significant barriers for all sites that could not be overcome. Therefore, the assessment concludes that there are no sequentially preferable sites.

CL Planning

Appendix CS4- Retal Impact Assessment by Lichfields

Tess Square, Marnhull
Retail Impact Assessment

DRAFT

M B Crocker Ltd

28 January 2025

67267/01/PW/PW
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Contents

1.0 Introduction

1.1 This Retail Impact Assessment (RIA) has been prepared on behalf of MB Crocker Limited ("the appellant") to assess the implications of a proposed food store and retail/service uses in Marnhull, Dorset.

The proposed development

1.2 The proposed development at Tess Square and Butts Close in Marnhull is expected to provide up to 120 dwellings on the Butts Close site and a mixed-use development on the Tess Square site. The mixed-use development is expected to provide:

- food store – 1,455 sq.m (GIA);
- café – 222 sq.m (GIA);
- estate agent – 99 sq.m (GIA);
- hairdresser – 100 sq.m (GIA);
- funeral care – 100 sq.m (GIA);
- dentist – 100 sq.m (GIA);
- vet – 100 sq.m (GIA); and
- offices – 181 sq.m (GIA).

1.3 These main town centres total 2,357 sq.m (GIA). The proposed food store is expected to have a net sales area of 814 sq.m net.

2.0 Planning policy

National Planning Policy Framework

2.1 The National Planning Policy Framework (NPPF) sets out the overarching policy priorities for the planning system, against which local plans will be prepared and decisions made on planning applications.

2.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a theme running through both plan-making and decision-taking. In terms of decision-taking, the NPPF states (paragraph 11) that this means (unless material considerations indicate otherwise):

C) approving development proposals that accord with an up-to-date development plan without delay; or

D) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

> *i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
>
> *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

2.3 The rapid changes that are affecting the retail sector and town centres, are acknowledged and reflected in the NPPF.

Sequential test

2.4 With regards to main town centre uses including retail and leisure, the NPPF sets out the requirements in terms of the sequential test. Paragraphs 91 and 92 state that:

"Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in 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.

When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. 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."

2.5 Paragraph 93 of the NPPF indicates the sequential test should not be applied to small-scale rural development. Small-scale rural development is not defined in the NPPF Annex 2: Glossary.

2.6 We understand Chapman Lily Planning has submitted a sequential assessment to the Council.

Retail impact test

2.7 In terms of retail impact, the NPPF indicates (paragraph 94) that local planning authorities, when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up to-date plan, should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq.m). Where required the impact analysis should include an assessment of:

a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

2.8 The NPPF does not require developers to demonstrate the need for proposed retail or other main town centre uses and commercial competition between these types of uses in any out-of-centre location is not a valid planning consideration.

2.9 Paragraph 95 of the NPPF states where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.

National Planning Practice Guidance (NPPG)

2.10 The National Planning Practice Guidance (NPPG) in terms of retail guidance, refers to the sequential test in the context of decision making. Regarding flexibility in format and/or scale, it states that it is not necessary to demonstrate that a potential town centre or edge of centre site can precisely accommodate the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal. As such, the guidance makes clear that it is the ability to accommodate the proposal on a single site is the key consideration.

2.11 The Appeal proposal includes main town centre uses that would be located outside of the four main designated town centres in North Dorset. In terms of locational requirements the PPG paragraph: 012 Reference ID: 2b-012-20190722 indicates "*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. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.*"

2.12 The NPPG states that the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible, which in this case is the Joint Town Centres & Retail Study – December 2017 and the Dorset Retail & Leisure Study – January 2023.

2.13 The NPPG states that the impact test only applies to proposals exceeding 2,500 sq.m floorspace unless a different locally appropriate threshold is set by the local planning authority. The NPPG outlines that the basis for undertaking an impact test is to determine whether there would be significant adverse impacts of locating main town centre use development outside of town centres. The NPPG goes on to acknowledge the need for an impact test to assess the potential implications of a scheme against other similar retailers in the area.

Local plan policies

2.14 The statutory development plan includes the adopted North Dorset Local Plan Part 1, which was adopted in January 2016.

2.15 Policy 2: Core Spatial Strategy identifies Blandford, Gillingham, Shaftesbury and Sturminster Newton as the main centres for services, including retail, health, leisure and employment opportunities in North Dorset. These centres are also identified in Policy 12 (see below). Supporting text at paragraph 3.36 suggests concentrating growth in these centres is expected to enable them to maintain their position as thriving market towns. Stalbridge and Marnhull are identified as Larger Villages, which will be the focus for growth to meet the local needs outside of the main towns. Paragraph 3.39 suggests areas outside the four main towns have more limited access and proximity to services. In these areas development will be more strictly controlled with an emphasis on meeting local and essential rural needs.

2.16 Policy 11: The Economy supports the continued improvement of the four main town centres as the main focus for retail, leisure and other commercial activities. Economic development is supported in the countryside including Stalbridge and the District's villages e.g. Marnhull by enabling rural communities to plan to meet their own needs.

2.17 Policy 12: Retail, Leisure and Other Commercial Development and supporting text at paragraph 6.78 indicates the Council will apply the sequential and impact tests in national policy to applications for main town centre uses that are not in an existing centre and are not in accordance with the development plan, unless the application is for small-scale rural development. Paragraph 6.82 indicates the Council will require a developer to produce an impact assessment for a retail, leisure or office development of 2,500 sq.m or more. The supporting text at paragraph 6.84 indicates access to services outside of the four main towns is a key issue. The Council wishes to ensure community facilities including retail are retained.

Planning policy conclusions

2.18 The proposed retail and service uses at Marnhull are located outside of the four main town centres and these commercial uses are in an out-of-centre location. The amount of retail, leisure and office floorspace proposed is below the NPPF and the adopted Local Plan impact threshold (2,500 sq.m) and an impact assessment is not required by policy. However, to assist the appeal and the consideration of the planning balance a proportionate retail impact assessment has been prepared.

2.19 Trade diversion and impact on the four main town centres has been considered. Any trade diversion from existing businesses in other locations outside these main centres should be considered to be valid commercial competition and is not a planning consideration.

2.20 Notwithstanding the requirement for a retail impact assessment, the appellant is not required to demonstrate a need for their proposed development. However, proposals that meet an identified need, and where that need cannot be accommodated within a town centre, will generate benefits in terms of providing more choice and higher levels of accessibility for customers.

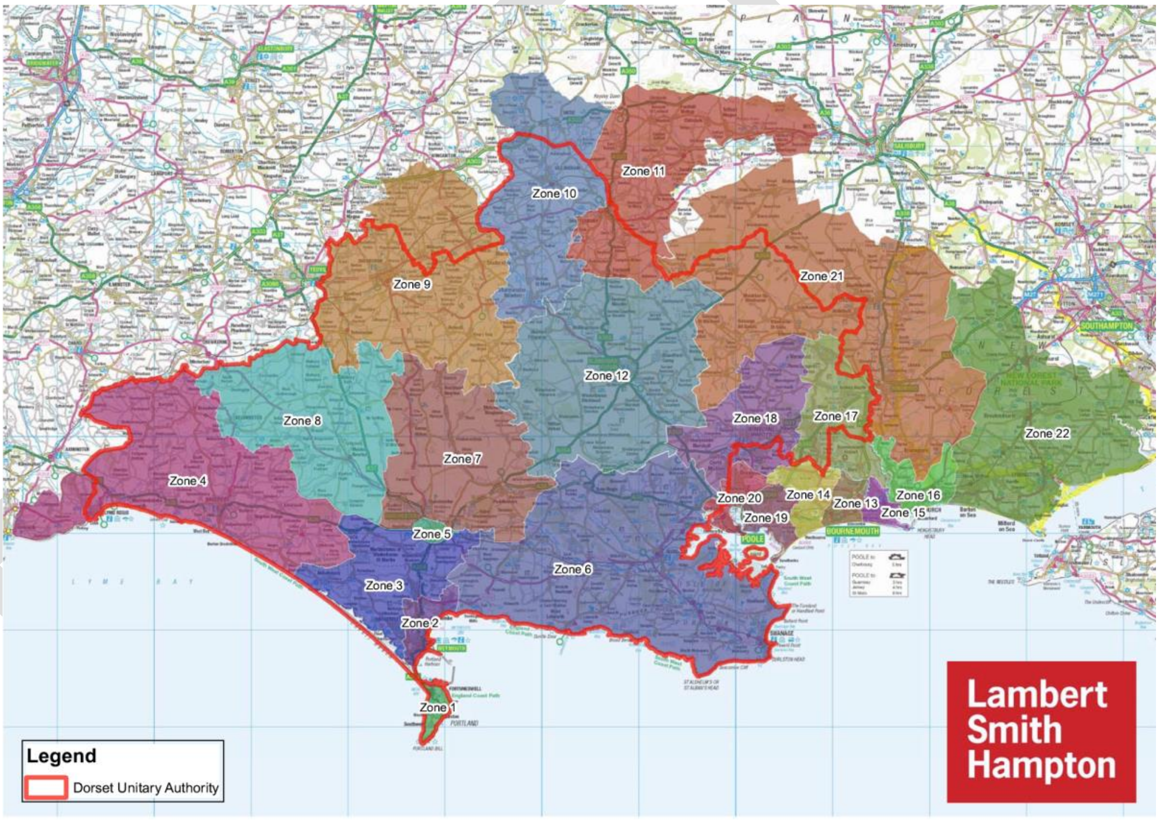
3.0 Retail impact assessment

Introduction

3.1 The proposed development is below the NPPF and adopted Local Plan impact threshold. The proposed food store is expected to generate the highest level of trade diversion and impact on the main town centres. The impact assessment in this section focuses primarily on convenience goods retail impact.

Methodology and data

3.2 The quantitative analysis is based on information the study area zones adopted in the Joint Town Centres & Retail Study – December 2017 and the Dorset Retail & Leisure Study – January 2023. The study area zones adopted in these two Dorset wide studies are shown below.



3.3 Marnhull falls in the centre of Zone 10, with Gillingham to the north and Sturminster Newton to the south. Stalbridge and Sherborne lie to the west in Zone 9 and Shaftesbury is to the east in Zone 11. The Joint Town Centres & Retail Study – 2017 included a household telephone shopping survey. These survey results were adopted to estimate convenience and comparison goods shopping patterns across Dorset in the 2017 study and the subsequent 2023 update. The survey results indicate that the catchment areas of the four main towns overlap to a significant extent and there is a high degree of retail expenditure outflow from Zones 9, 10 and 11 to larger shopping destinations e.g. Yeovil 20km to the west of Marnhull and Blandford Forum 15km to the southeast.

3.4 Zones 9, 10 and 11 have been adopted in this impact assessment to quantify existing and future convenience goods shopping patterns. These three zones cover the primary catchment areas of the four main towns in North Dorset, i.e. Gillingham, Shaftesbury, Sherborne and Sturminster Newton.

3.5 The primary catchment area of the proposed food store at Marnhull will fall primarily in the central part of Zone 10, up to about four kilometres. It will extend into Zone 9 to the east to Stalbridge. The food store is expected to draw more limited levels of trade from residents beyond 4km in the rest of the three study area zones.

3.6 The study area zones and the 0-2km and 2-4 km area are shown in Appendix 1.

Design year

3.7 The proposed food store is expected to open during 2027 at the earliest. An impact design year of 2030 has been adopted, allowing two full calendar years to achieve full and settled trading levels. Planning Policy Guidance (PPG) states:

"The design year for impact testing will need to be selected to represent the year when the proposal has achieved a 'mature' trading pattern. This is conventionally taken as the second full calendar year of trading after the opening of each phase of a new retail development, but it may take longer for some developments to become established."

3.8 In line with this guidance focuses on the change in trading levels between 2025 and 2030. Horizon year figures for 2035 have also been provided.

Population and expenditure

3.9 Experian indicates the population in the three study areas zones was 81,064 in 2022, as shown in Table 1 in Appendix 2. Population in Marnhull (the 0-2 km area from the centre of the village) was 1,988 people. A further 1,335 people live in the 2-4 km area from the centre of the village, including residents in Fifehead Magdalen, Hinton St Mary, Stour Provost and West Stour.

3.10 Five planning permission for 24 new residential dwellings were completed in Marnhull village after 2022, as listed overleaf. There are extant planning permissions/prior approvals for a further 249 new dwellings (including 39 dwellings permitted on the Butts Close site). Based on a conservative (low) average of two people per dwelling, recognising some of the residents in the new homes may already live in the local area, these residential completions and commitments would increase Marnhull's population by at least 546 people.

3.11 The appeal proposals will, if permitted increase the number of new dwellings in Marnhull to 354 dwelling, an additional 81 dwellings on the Butts Close site. These additional dwellings along with commitments will increase Marnhull's population by at least 708 people.

3.13 Completed residential planning permissions in Marnhull since 2022:

- 2/2017/1215/FUL – Mowes Lane 1 no. dwelling
- 2/2018/0084/OUT and REM2/2020/0042/REM
  – land north of Kentishworth Road 9 no. dwellings
- 2/2018/1303/OUT – land north of Elmside Musbury Lane 1 no. dwelling
- 2/2018/1406/OUT – land west of Vale Cottage Ham Lane 2 no. dwellings
- P/RES/2021/0447 and P/FUL/2022/07019 – Joyces New St. 11 no. dwellings

3.14 Extant residential planning permissions in Marnhull:

- P/OUT /2023/00627 - Salisbury Street 67 no. dwellings
- 2/2018/1124/OUT and RES/2024/03588 – land north of Crown Rd 69 no. dwellings
- 2/2018/1808/OUT – land north of Burton Street 61 no. dwellings
- 2/2019/0722/FUL – Ashley Down Farm, Great Down Lane 1 no. dwelling
- P/OUT/2020/00179 – 10 New Street 1 no. dwelling
- P/PAAC/2023/04298 and P/FUL/2024/0603
  - Strangways Fram, Hains Lane 4 no. dwellings
- P/OUT/2021/03030 – land at Butts Close 39 no. dwellings
- P/FUL/2023/00733 - Squirrel Bank Love Lane 1 no. dwelling
- P/FUL/2023/01556 - Old Farm Bungalow, Stonylawn 1 no. dwelling
- P/FUL/2024/02163 – Blackmore Vale Inn, Burton Street 2 dwellings
- P/FUL/2024/01949 – Cross Tree Fram, Sackmore Lane 1 dwelling
- P/PAAC/2024/00510 - agricultural buildings, Haines Ln/Ham Ln 1 dwelling
- P/FUL/2023/06760 – Ashley Farm, Sodom Lane 1 dwelling.

3.15 Population in the study area is projected to increase from 82,469 in 2025 to 83,954 in 2030 and 85,739 in 2035. These Experian population projections are trend based (in line with the ONS's 2018 projections). The projections are not based on residential development commitments and the estimate population growth may not reflect large scale development permitted in the study area e.g. in Gillingham, Blandford and Sturminster Newton. The estimates of population and expenditure growth in this assessment may be conservative.

3.16 The level of available expenditure to support floorspace is based on first establishing per capita levels of spending for the catchment area population. Experian's local consumer expenditure estimates for comparison and convenience goods retail for the year 2022 have been obtained. This expenditure information is based on National Statistics and Experian is a widely adopted and accepted source of information at planning hearings and appeals. Experian's EBS national expenditure information (Experian Retail Planner Briefing Note 21 – February 2024) has been used to forecast future expenditure. Experian's EBS growth forecast rates for 2023 to 2025 reflect the recent economic circumstances, recent past growth rates and provide an appropriate growth rate for the short and longer term, as follows:

- convenience goods: no growth during 2026 to 2030 and +0.1% growth per annum beyond 2030;
- comparison goods: +3.1% per annum growth for 2026 to 2030 and +2.8% per annum beyond 2030; and
- leisure: +1.1% per annum growth for 2026 to 2030 and +0.8% per annum after 2030.

3.17 These growth figures relate to real growth and exclude inflation.

3.18 Special Forms of Trading (SFT) or non-store activity includes other forms of retail expenditure not spent in shops e.g., mail order sales, some internet sales, vending machines, party plan selling, market stalls and door to door selling. Experian provides adjusted deductions for SFT and projections. These projections have been used to exclude only on-line expenditure attributed to non-retail businesses, which will not directly impact on the demand for retail floorspace. The adjusted figures suggest that SFT sales in 2025 are 5.6% of convenience goods expenditure and 25.5% for comparison goods expenditure. The projections provided by Experian suggest that these percentages could increase to 6.5% and 27.8% by 2030 respectively. Projections for average convenience goods expenditure per capita split for main and top-up food and grocery shopping (adopting a 70:30 split) are shown in Tables 2A and 2B in Appendix 2. Comparison goods and food/beverage expenditure projections are shown in Tables 2C and 2D.

3.19 These figures have been adopted and suggests the study area population generates the following expenditure in 2025, as shown in Tables 3A to 3E in Appendix 2 (the Marnhull 0-4km figures in brackets):

- convenience goods retail expenditure — £223.58 million (£9.97 million)
- comparison goods retail expenditure — £260.31 million (£11.58 million)
- food and beverage expenditure — £134.43 million (£6.0 million)

3.20 Residents in the 4km area from the centre of Marnhull village currently generate total retail and food/beverage expenditure of £27.55 million.

3.21 Experian's population and expenditure per capita projections suggest total available convenience goods expenditure in the study area will increase slightly by 0.9% between 2025 and 2030, from £223.58 million to £223.57 million. Convenience goods expenditure in the 0-4km Marnhull area will increase by 18.6% between 2025 and 2030, from £9.97 million to £11.82 million, due to residential developments.

3.22 Comparison goods expenditure in the study area will increase by 15% between 2025 and 2030, increasing from £260.31 million to £299.36 million. Comparison goods expenditure in the 0-4km Marnhull area will increase by 34.8% between 2025 and 2030, from £11.58 million to £15.62 million.

3.23 Food and beverage expenditure in the study area will increase by 7.6% between 2025 and 2030, increasing from £134.43 million to £144.61 million. Food and beverage expenditure in the 0-4km Marnhull area will increase by 26.4% between 2025 and 2030, from £6 million to £7.58 million.

Base year shopping patterns

3.24 Joint Town Centres & Retail Study – December 2017 and the Dorset Retail & Leisure Study – January 2023 adopted results from a household telephone survey undertaken by NEMS Market Research in July 2017. This survey included 1,204 completed interviews with 100 interviews in each zone (Zones 9, 10 and 11). The survey results are contained in the Joint Town Centres & Retail Study Appendices – Volume II, Appendix 25.

3.25 Question Q01 asked respondents where they normally shop for the household's main food and grocery shopping. Question Q06 asked respondents about other destinations regularly used for main food shopping. Question Q07 asked respondents where they normally do most of their small-scale top-up shopping (e.g. to buy bread, milk etc). Question Q08 asked respondents about other destinations regularly used for small scale top-up shopping. These questions are a fairly standard and widely adopted for quantifying convenience goods expenditure flows.

3.26 The base year 2025 convenience goods turnover of food stores and shopping destination within the study area have been estimated based on market shares or penetration rates, estimated from these household survey results for Zones 9, 10 and 11. The markets shares have been adjusted to reflect the implementation of food store completions since the household survey was undertaken in 2017 i.e. a new Aldi store in Gillingham (opened in 2020) and a new Lidl store in Shaftesbury (opened in 2021). The adjusted market shares for convenience goods shopping are shown in Tables 4A to 4D in Appendix 2.

3.27 The results of the household shopper survey for main and top-up food and grocery shopping have been used to estimate existing convenience goods shopping patterns. The market shares in Table 4A to 4D in Appendix 2 are a combined rate for the normal main, secondary main, normal top-up and secondary top-up shopping destinations based on a 70:30 expenditure split between main and top up shopping. This 70:30 split is based on Lichfields' experience and is widely accepted in retail studies of this kind. A 75:25 split expenditure split has been adopted for the normal and secondary shopping destinations for both main and top-up shopping.

3.28 Estimated convenience goods expenditure flows are shown in Tables 5A to 5E. The combined main and top-up shopping markets shares are summarised in Table 3.1.

3.29 As indicated earlier, Marnhull lies within Zone 10. The household survey results indicate Gillingham is the main food and grocery shopping destination for residents in Zone 10 followed by Sturminster Newton. However, the survey results also suggest a significant amount of expenditure flows out of Zone 10 to food stores in Blandford Forum, Shatesbury and Wincanton.

3.30 Household survey respondents were asked (Question Q02) what they like about their normal main food shopping destination. In Zone 10 the main factors liked by respondents about their normal main food shopping destination were convenience to home (34%), low prices/value (21.9%), quality of goods available (16.1%) and range of food goods available (14.8%).

Table 3.1 Combined convenience goods market shares in the study area (% of all expenditure in each zone)

Zone	Marnhull 0-4 kms	Zone 9	Zone 10	Zone 11	All study area
Marnhull shops	5.0	0	0.2	0.0	**0.3**
Sturminster Newton	12.1	1.8	14.4	0.5	**5.6**
Gillingham	51.8	12.9	53.5	26.4	**30.0**
Stalbridge	0.8	10.1	1.0	0.0	**4.4**
Sherborne	1.2	28.7	1.3	0.8	**12.2**
Shaftesbury	4.9	2.9	4.9	48.5	**15.3**
Blandford Forum	11.3	1.1	11.3	1.3	**4.6**
Wincanton	4.7	17.0	4.7	3.8	**9.5**
Yeovil	0.0	18.2	0.0	0.0	**7.4**
Other Zones 9, 10 and 11	1.5	0.0	2.0	7.9	**2.7**
Elsewhere/internet	6.6	7.3	6.7	10.8	**8.0**
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Source: Table 5E, Appendix 2.

Turnover of the proposed food store and other uses

3.31 The proposed food store will have a sales area of 814 sq.m net. This is expected to include an in-store café of 63 sq.m. However, the retail impact assessment assumes all the net sales area (814 sq.m) will be devoted to retail sales and up to 90% of the sales floorspace will be convenience goods retail floorspace.

3.32 The operator for the food store is not confirmed at this stage. We understand the operator is unlikely to be a main national food and grocery multiples e.g. Co-op, Sainsbury's or Tesco. The store is more likely to attract a smaller independent operator, which are likely to trade at a lower density that the main national operators. Nevertheless, a higher generic average convenience goods sales density of £11,000 per sq.m net has been adopted, consistent with the company average sales densities for the main food store operators. A higher generic average comparison goods sales density of £6,500 per sq.m net has also been adopted.

3.33 The estimated convenience and comparison goods turnover of the proposed food store is calculated in Table 4A in Appendix 2. The total turnover is £8.59 million, split £8.06 convenience goods and £0.53 comparison goods.

3.34 The in-store café and separate café (222 sq.m gross) proposed are expected to have a combined net area of 218 sq.m net. The turnover of these café uses would be £1.31 million, based on an average sales density of £6,000 per sq.m net. Other service facilities include a hairdresser, estate agent, funeral care, dentist and vet occupying 100 sq.m each.

3.35 The scale of the comparison goods turnover (£0.53 million) is insignificant, accounting for less than 4% of the 0-4 km area residents' total comparison goods expenditure in 2030 (£15.62 million as shown in Table 3D). The proposed 120 new homes alone, will generate additional comparison goods expenditure of £0.92 million, assuming 240 people with an average comparison goods spend of £3,823 per person in 2030.

3.36 The scale of the café turnover (£1.31 million) is also insignificant, accounting for about 17% of Marnhull residents' total food/beverage expenditure in 2030 (£7.58 million as shown in Table 3E).

3.37 Experian local expenditure data for 2022 or the 0-4km area from Marnhull suggests local residents generate £0.37 million on hairdressing salons and personal grooming. Population growth between 2022 and 2030 should increase this expenditure to at least £0.5 million.

3.38 There will be no discernible impact on existing comparison goods, food/beverage and services facilities. Indeed, the additional comparison goods expenditure generated by the new homes will have a positive impact.

3.39 The remainder of this Section estimates the origin of the proposed food store's convenience goods turnover and the implications for designated town centres.

Designated town centres and other destinations

3.40 Sturminster Newton town centre is the closest centre to the proposed developments and is likely to experience the highest levels of proportional impact. It is approximately 4.5kms to the south of the appeal site. Stalbridge is a similar distance to the west but is not currently a designated town centre. The other nearest town centres are in Gillingham about 8km to the north; Shaftesbury about 9kms to the northeast, Sherborne 14km to the west and Wincanton 12km to the northwest.

3.41 The catchment areas of these centres will overlap with the proposed appeal development and food and grocery shopping trip trade diversion from these centres is envisaged. An overview of the centres that are most likely to experience trade diversion and impacts is provide below.

Marnhull Village

3.42 Marnhull is not a designated as town, village or local centre in the adopted Local Plan. Marnhull has a small selection of facilities. There is cluster of facilities in the north of village in Burton Street, which includes Robin Hill Store & Post Office, a hair and beauty salon, a curtain shop and the Blackmore Vale Inn. The is a small Spar convenience store in the southwest of the village on New Street. Other facilities include Marnhull surgery and pharmacy, Cooks Garage and the Crown hotel.

Stalbridge

3.43 Stalbridge is also not a designated as town, village or local centre in the adopted Local Plan. Stalbridge has a more extensive choice of facilities than Marnhull, including:

- Dike & Sons supermarket (VOA - sales area 1,175 sq.m net)
- Butcher
- Post Office
- Optician
- Hot food takeaways
- Accountant office
- Community shop
- Community centre
- Hairdressing salon
- Pharmacy

- The Swan public house
- Bicycle shop
- Coffee shop
- Café
- Florist
- Library
- Fabric shop
- Indian restaurant
- Petrol filling station.

Sturminster Newton

3.44 Sturminster Newton is a designated town centre in the adopted Local Plan. The Joint Town Centres & Retail Study – December 2017 (Tables 9.1 and 9.2) indicated the centre had 61 units with a total floor area of about 9,000 sq.m. There were seven vacant shop units in 2015, a vacancy rate of 11.5% which was similar to the UK average at that time (11.2%).

3.45 There are six convenience goods outlets including a Co-op convenience store (481 sq.m net), a One Stop convenience store (153 sq.m net – VOA), a mediterranean food store, baker, greengrocer and newsagent.

Gillingham

3.46 Gillingham is a designated town centre in the adopted Local Plan. The Joint Town Centres & Retail Study – December 2017 (Tables 7.1 and 7.2) indicated the centre had 99 units with a total floor area of about 22,500 sq.m. There were nine vacant shop units in October 2016, a vacancy rate of 9.1%, below the UK average at that time (11.2%).

3.47 There are six convenience goods outlets in the town centre, including:

- Asda supermarket (1,701 sq.m net sales)
- Waitrose supermarket (1,933 sq.m net sales)
- Lidl (951 sq.m net sales)
- Iceland (473 sq.m net sales)

3.48 In addition to these in-centre stores, Gillingham has out-of-centre stores i.e. Aldi (1,110 sq.m net sales) and Budgens (364 sq.m net sales) at Kingsmead Business Park and a small Co-op store at Lodbourne Green.

3.49 The Joint Town Centres & Retail Study identified Gillingham's "good range of supermarkets" as a key strength.

Shaftesbury

3.50 Shaftesbury is a designated town centre in the adopted Local Plan. The Joint Town Centres & Retail Study – December 2017 (Tables 8.1 and 8.2) indicated the centre had 130 units with a total floor area of about 23,000 sq.m. There were five vacant shop units in March 2016, a vacancy rate of 3.9%, significantly below the UK average at that time (11.2%).

3.51 There are five convenience goods outlets in the town centre, including a Tesco supermarket (2,164 sq.m net sales), Morrisons Daily (129 sq.m net sales), greengrocer, wine shop and deli. There is an edge-of-centre Lidl store (903 sq.m net) and a small out-of-centre Co-op store.

3.52 The Joint Town Centres & Retail Study identified Shaftesbury's "good convenience provision" and low vacancy levels as key strengths.

Sherborne

3.53 Sherborne is a designated town centre in the adopted West Dorset, Weymouth & Portland Local Plan 2015. The Joint Town Centres & Retail Study – December 2017 (Tables 15.1 and 15.2) indicated the centre had 175 units with a total floor area of about 17,800 sq.m. There were eight vacant shop units in February 2016, a vacancy rate of 4.6%, significantly below the UK average at that time (11.2%).

3.54 There are five convenience goods outlets in the town centre, including a Tesco supermarket (2,164 sq.m net sales), Morrisons Daily (129 sq.m net sales), greengrocer, wine shop and deli. There is an edge-of-centre Lidl store (903 sq.m net) and a small out-of-centre Co-op store.

Blandford Forum

3.55 Blandford Forum is a designated town centre in the adopted Local Plan. The Joint Town Centres & Retail Study – December 2017 (Tables 6.1 and 6.2) indicated the centre had 186 units with a total floor area of about 28,000 sq.m. There were 12 vacant shop units in March 2017, a vacancy rate of 6.5%, significantly below the UK average at that time (11.2%).

3.56 There are 14 convenience goods outlets in the centre, including:

- Morrisons (1,511 sq.m net sales)
- Marks & Spencer Foodhall (863 sq.m net sales)
- Iceland (528 sq.m net sales)

3.57 In addition to these in-centre stores, Blandford has out-of-centre food stores i.e. Tesco (1,971 sq.m net sales), Lidl (1,032 sq.m net), Budgens (364 sq.m net sales).

3.58 The Joint Town Centres & Retail Study identified Blandford as "a vital and viable centre" with a good range of shopping and leisure facilities, including "good convenience provision" and "low vacancy levels".

Base year trading levels 2025

3.59 The current turnover of food stores and convenience goods destinations in the study area has been estimated in Tables 5A to 5E in Appendix 2. These estimates are based on the convenience goods market shares shown in Tables 4A to 4D in Appendix 2. The market shares are based on the household shopper survey results, as described earlier. The 2025 base year turnover estimates are shown in the first column of figures (Column A) in Table 10 in Appendix 2. The current convenience goods turnovers of destinations are as follows:

- Marnhull £0.77 million
- Sturminster Newton £13.71 million
- Gillingham £85.65 million
- Stalbridge £10.41 million
- Sherborne £31.44 million

- Shaftesbury £45.49 million
- Blandford Forum £30.06 million
- Wincanton £47.16 million
- Yeovil £109.65 million.

Design year trading 2030 – without the appeal proposals

3.60 The 2025 base year turnover estimates have been projected to 2030 based on constant market share, as shown in Table 6. The 2030 pre-development turnover estimates are shown in the first column of figures (Column B) in Table 10 in Appendix 2. The projected convenience goods turnovers of destinations in 2030 are as follows:

- Marnhull £0.90 million
- Sturminster Newton £13.88 million
- Gillingham £86.63 million
- Stalbridge £10.49 million
- Sherborne £31.67 million
- Shaftesbury £45.55 million
- Blandford Forum £30.55 million
- Wincanton £47.55 million
- Yeovil £110.41 million.

Design year trading levels 2030 - with the appeal store

3.61 As indicated earlier, the expected convenience goods turnover of the proposed food store at Marnhull is £8.06 million, as shown in Table 7A in Appendix 2. The expected pattern of trade draw from each zone is shown in Table 7B in Appendix 2. Most of the store's trade (63% - £5.08 million) is expected to come from residents in the 0-4km area from Marnhull. A further 16% (£1.29 million) is expected to come from residents in Zone 9, primarily the Stalbridge and Henstridge areas. Additional trade will be attracted from the rest of Zone 10 (£0.89 million) e.g. from Kington Magna and East Stour. A small amount of trade is expected to come from residents in Zone 11 (£0.4 million) and inflow from beyond the study area (£0.4 million).

3.62 The revised shopping patterns, with the proposed food store, are shown in Table 9 in Appendix 2. The pattern of trade diverted from existing facilities is based on current shopping patterns, the expected trade draw of the food store, and judgments about the propensity for the store to compete with other facilities for food and grocery shopping trips. The impact of the proposed store is shown in Table 10 in Appendix 2. The proposal will compete primarily with other food stores in the study area.

3.63 The residual trading performance for each destination post-development in 2030 is shown in Column C in Table 10, Appendix 2. The level of trade diversion to the proposed store is shown in Column D and the proportional reduction in turnover in 2030 is shown in Column E.

3.64 The levels of impact (reduction in turnover) vary from less than -0.1% to -20.3%. The highest impact (-20.3%) is expected to fall on existing facilities in Marnhull. However, this reduction in turnover will be offset by growth in expenditure between 2025 and 2030, due to residential developments in the village, including the appeal proposals.

3.65 The projected post development convenience goods turnover of facilities in 2030 is as follows:

- Marnhull £0.72 million
- Sturminster Newton £12.77 million
- Gillingham £82.19 million
- Stalbridge £10.14 million
- Sherborne £31.29 million
- Shaftesbury £44.82 million
- Blandford Forum £30.30 million
- Wincanton £47.31 million
- Yeovil £110.18 million.

Impact implications

3.66 In terms of the impact tests set out in the NPPF, the limited level of trade diversion needs to be considered in terms of the impact on:

- town centre vitality and viability; and
- existing, committed and planned investment.

Marnhull

3.67 As indicate above, Marnhull is not a designated town centre, and existing businesses are not afforded planning protection from commercial competition. Notwithstanding this policy position, existing convenience goods shops in Marnhull are expected to benefit from residential developments within the village. Their convenience goods turnover is projected to increase from £0.77 million in 2025 to £0.90 million in 2030. The proposed appeal food store will reduce the 2030 turnover to £0.72 million, which is only 6.5% lower than the base year 2025 turnover. Even if one of the convenience outlets in the village were to close, which is unlikely, residents in Marnhull would still have an improved provision of food and grocery facilities within walking distance.

Stalbridge

3.68 As in Marnhull, Stalbridge is not a designated town centre, and existing businesses are not afforded planning protection from commercial competition.

3.69 The convenience goods turnover of outlets in Stalbridge is projected to increase from £10.41 million in 2025 to £10.49 million in 2030. The proposed appeal food store will reduce the 2030 turnover to £10.14 million, a total trade diversion of £0.36 million. The post-development turnover is only 3.4% lower than the base year 2025 turnover. Most trade diversion (£0.29 million) will come from the Dike & Son store, but this store will retain a healthy convenience goods turnover of £6.08 million compared with the base year turnover of £6.33 million. Impact on Stalbridge will not be significant.

Sturminster Newton

3.70 The convenience goods turnover of outlets in Sturminster Newton is projected to increase from £13.71 million in 2025 to £13.88 million in 2030. The proposed appeal food store will reduce the 2030 turnover to £12.77 million, which is 6.8% lower than the base year 2025 turnover. Most trade diversion (£0.92 million) will come from the Co-op store. The residual turnover of the Co-op store is £7.71 million. The Co-op store has a sales net area of 481 sq.m net (source ORC Storepoint). The Co-op company average sales density for convenience goods floorspace is £12,791 per sq.m net (2024 prices). This sales density suggests a benchmark turnover of £6.15 million for a Co-op store of this size (based on 100% convenience goods sales). The estimated residual turnover of the store (£7.71 million) is over 25% above this benchmark. The Co-op store will continue to trade healthily.

3.71 Impact on other convenience goods outlets in the town centre is only -3.7%, and the residual turnover (£4.05 million) is only marginally lower than the base year turnover (£4.09 million). No shop closures are envisaged and no reduction in consumer choice or the vitality and viability of the centre will occur. Impact on Sturminster Newton will not be significant.

Gillingham

3.72 The convenience goods turnover of outlets in Gillingham is projected to increase from £85.65 million in 2025 to £86.63 million in 2030. The proposed appeal food store will reduce the 2030 turnover to £82.19 million, which is only 4% lower than the base year 2025 turnover. Most trade diversion (£4.34 million) will come from the four main food stores in the town, i.e. Asda, Aldi, Lidl and Waitrose.

3.73 The company benchmark turnovers of the three town centre food stores are as follows:

- Asda – 1,337 sq.m net at 11,590 per sq.m net = £15.50 million
- Lidl – 850 sq.m net at 7,413 per sq.m net = £6.30 million
- Waitrose – 1,691 sq.m net at 15,647 per sq.m net = £26.46 million

3.74 The residual post development turnovers of the Asda (£18.37 million) and Lidl store (£21.66 million) are significantly higher than the company average benchmark turnovers. The Waitrose store is estimated to trade 9.4% below benchmark (£23.98 million compared with £26.46 million), which is within the normal range food store typically trade around their company average. Food stores in Gillingham are expected to continue to trade healthily.

3.75 Impact on other convenience goods outlets in the town centre is only -2.9%, and the residual turnover (£3.39 million) is only marginally lower than the base year turnover (£3.46 million). No shop closures are envisaged and there will be no reduction in consumer choice or the vitality and viability of the centre. Impact on Gillingham will not be significant.

Shaftesbury

3.76 The convenience goods turnover of outlets in Shaftesbury is projected to increase from £45.49 million in 2025 to £45.55 million in 2030. The proposed appeal food store will reduce the 2030 turnover to £44.82 million, which is only 1.5% lower than the base year 2025 turnover. Most trade diversion (£0.7 million) will come from the two main food stores in the town, i.e. Tesco and Lidl. The company benchmark turnovers of these stores are as follows:

- Tesco – 1,728 sq.m net at 16,837 per sq.m net = £29.09 million
- Lidl – 923 sq.m net at 7,413 per sq.m net = £6.84 million

3.77 The residual post development turnover of the Lidl store (£10.82 million) is significantly higher than the company average benchmark turnover. The Tesco store is estimated to trade only 2.5% below benchmark (£28.35 million compared with £29.09 million). Food stores in Shaftesbury are expected to continue to trade healthily.

3.78 Impact on other convenience goods outlets in the town centre is only -0.5%, and the residual turnover (£2.42 million) is only marginally lower than the base year turnover (£2.43 million). No shop closures are envisaged and there will be no reduction in consumer choice or the vitality and viability of the centre. Impact on Shaftesbury will not be significant.

Blandford Forum

3.79 The proposed appeal food store is expected to divert only £0.24 million from Blandford Forum, most of which will come from the out-of-centre Tesco store. Estimated impact on the Tesco store is less than 1%. Limited impact is envisaged on food stores in the town centre.

Other destinations

3.80 Impacts on other town centres and destination are expected to range from -0.1% to -1.2%. These levels of impact are not significant. Trade diversion and impact on convenience goods facilities in Sherborne is only £0.41 million and -1.1%. This impact will fall primarily on the Sainsbury's and Waitrose stores. The post development residual turnover of Sherborne is £35.79 million, which is only marginally lower than the 2025 base year turnover (£31.44 million).

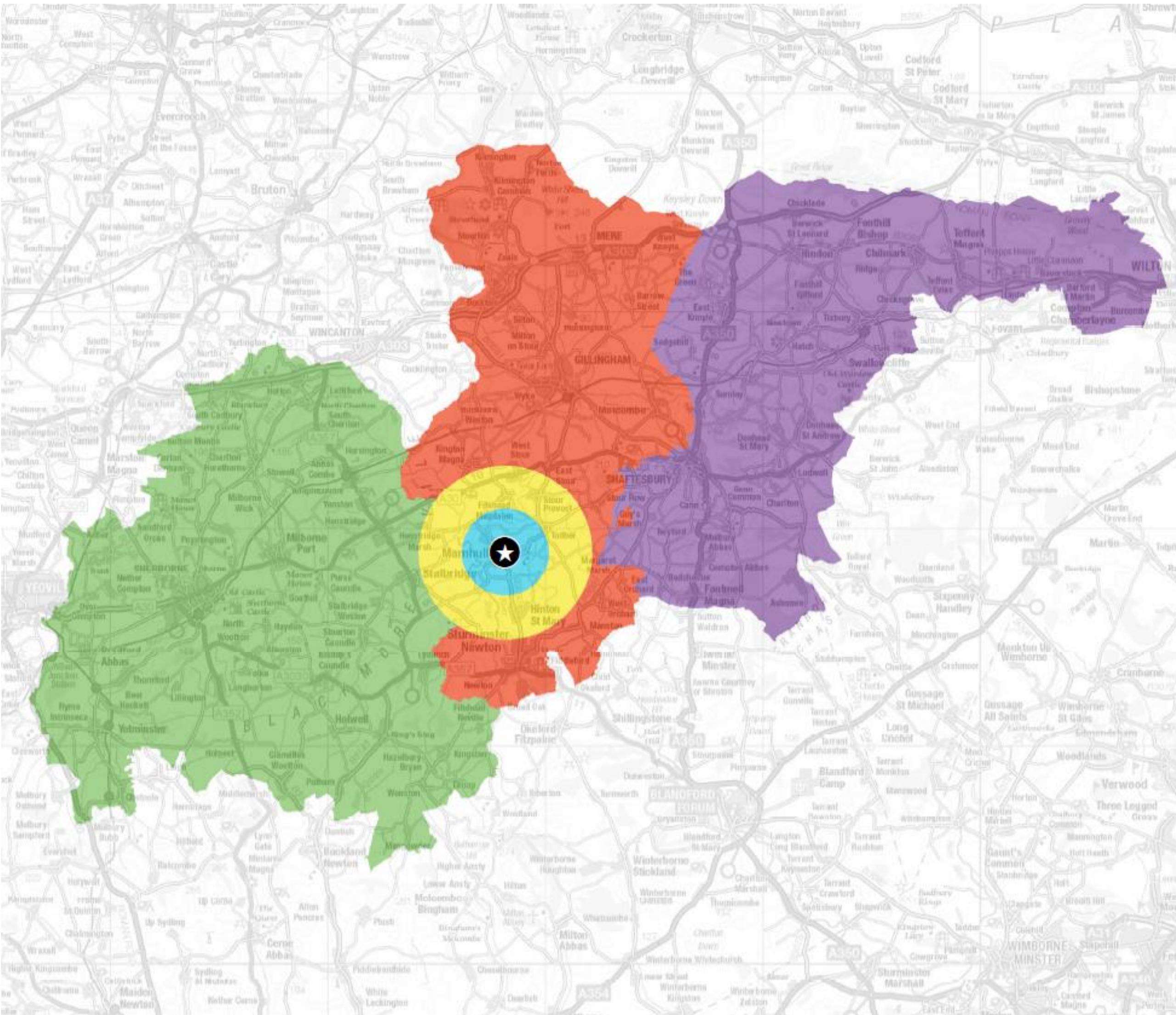
3.81 Impact on food stores in Wincanton and Yeovil ranges from -0.2% to -0.7%. This low level of impact will be mostly offset by expenditure growth between 2025 and 2030.

Summary

3.82 The appeal proposals will not significantly change the trading performance of centres and the quantitative analysis raises no concerns regarding the future trading of any designated centres or their vitality and viability.

3.83 Impact is expected to be dispersed amongst a number of food and grocery shopping destinations, which reflects existing trading patterns in the study area. The predicted levels of trade diversion and impact are insignificant in view of the healthy trading levels within existing stores. The proposed development will not a have a significant adverse impact on existing, committed or planned investment or the vitality and viability of centres in terms of the considerations set out in the NPPF.

Appendix 1 Study area



Key

Postcode: DT10 1PU

Zones:

- 0 - 2km Distance Ring
- 2 - 4km Distance Ring
- Zone 9
- Zone 10
- Zone 11

Appendix 2 Retail impact tables

Table 1: Study area population projections

Zone	2022	2025	2030	2035
Residential developments Marnhull*	0	48	708	708
Marnhull 0-2km	1,988	1,988	1,988	1,988
Marnhull hinterland 2-4km	1,335	1,354	1,351	1,341
Zone 9 - Sherborne / Stalbridge	32,375	33,005	33,554	33,870
Zone 10 - Gillingham / Sturminster	24,660	25,028	25,134	26,519
Zone 11 - Shaftesbury	20,706	21,046	21,213	21,307
Total	**81,064**	**82,469**	**83,948**	**85,733**

Source: Experian MMG3 population projections

** new residential developments - 24 completed homes since 2022 and 330 proposed homes at an avergae of 2 people per home.*

Table 2A: Main food and grocery shopping convenience goods expenditure per person (£)

Zone	2025	2030	2035
Marnhull 0-2km	2,070	2,050	2,048
Marnhull hinterland 2-4km	2,045	2,026	2,022
Zone 9 - Sherborne / Stalbridge	1,917	1,898	1,896
Zone 10 - Gillingham / Sturminster	1,840	1,823	1,820
Zone 11 - Shaftesbury	1,910	1,892	1,889

Table 2B: Top-up food and grocery shopping convenience goods expenditure per person (£)

Zone	2025	2030	2035
Marnhull 0-2km	887	879	878
Marnhull hinterland 2-4km	877	868	867
Zone 9 - Sherborne / Stalbridge	821	814	812
Zone 10 - Gillingham / Sturminster	789	781	780
Zone 11 - Shaftesbury	819	811	810

Table 2C: Comparison goods expenditure per person (£)

Zone	2025	2030	2035
Marnhull 0-2km	3,386	3,823	4,310
Marnhull hinterland 2-4km	3,467	3,914	4,413
Zone 9 - Sherborne / Stalbridge	3,195	3,607	4,067
Zone 10 - Gillingham / Sturminster	2,999	3,386	3,817
Zone 11 - Shaftesbury	3,240	3,658	4,124

Table 2D: Food and beverage expenditure per person (£)

Zone	2025	2030	2035
Marnhull 0-2km	1,771	1,871	1,947
Marnhull hinterland 2-4km	1,606	1,696	1,765
Zone 9 - Sherborne / Stalbridge	1,717	1,813	1,887
Zone 10 - Gillingham / Sturminster	1,542	1,629	1,695
Zone 11 - Shaftesbury	1,732	1,830	1,904

Sources:
Experian Local Expenditure 2022 (2022 prices)
Experian expenditure and SFT projections - Retail Planner Briefing Note 21 - February 2024

Table 3A: Main food and grocery shopping convenience goods expenditure (£m)

Zone	2025	2030	2035
Marnhull 0-2km	4.21	5.54	5.53
Marnhull hinterland 2-4km	2.77	2.74	2.71
Zone 9 - Sherborne / Stalbridge	63.26	63.70	64.20
Zone 10 - Gillingham / Sturminster	46.06	45.81	48.26
Zone 11 - Shaftesbury	40.20	40.14	40.26
Total	**156.50**	**157.93**	**160.97**

Source: Tables 1 and 2A

Table 3B: Top-up food and grocery shopping convenience goods expenditure (£m)

Zone	2025	2030	2035
Marnhull 0-2km	1.81	2.37	2.37
Marnhull hinterland 2-4km	1.19	1.17	1.16
Zone 9 - Sherborne / Stalbridge	27.11	27.30	27.52
Zone 10 - Gillingham / Sturminster	19.74	19.63	20.68
Zone 11 - Shaftesbury	17.23	17.20	17.25
Total	**67.07**	**67.68**	**68.99**

Source: Tables 1 and 2B

Table 3C: Combined main and top-up food and grocery shopping convenience goods expenditure (£m)

Zone	2025	2030	2035
Marnhull 0-2km	6.02	7.91	7.90
Marnhull hinterland 2-4km	3.96	3.91	3.87
Zone 9 - Sherborne / Stalbridge	90.37	91.00	91.72
Zone 10 - Gillingham / Sturminster	65.80	65.45	68.95
Zone 11 - Shaftesbury	57.43	57.34	57.51
Total	**223.58**	**225.61**	**229.95**

Source: Tables 3A and 3B

Table 3D: Comparison goods expenditure (£m)

Zone	2025	2030	2035
Marnhull 0-2km	6.89	10.33	11.64
Marnhull hinterland 2-4km	4.69	5.29	5.92
Zone 9 - Sherborne / Stalbridge	105.46	121.03	137.74
Zone 10 - Gillingham / Sturminster	75.07	85.10	101.23
Zone 11 - Shaftesbury	68.20	77.60	87.88
Total	**260.31**	**299.36**	**344.41**

Source: Tables 1 and 2C

Table 3E: Food and beverage expenditure (£m)

Zone	2025	2030	2035
Marnhull 0-2km	3.61	5.05	5.26
Marnhull hinterland 2-4km	2.40	2.53	2.61
Zone 9 - Sherborne / Stalbridge	53.00	56.91	59.78
Zone 10 - Gillingham / Sturminster	42.96	45.57	50.04
Zone 11 - Shaftesbury	32.46	34.56	36.12
Total	**134.42**	**144.61**	**153.80**

Source: Tables 1 and 2D

Table 4A: Main-food shopping - normal destination market shares (%)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow
Zone 10						
Marnhull						
Spar/Robin Hill Stores, Marnhull	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Sturminster Newton						
Co-op, Sturminster Newton	2.0%	2.0%	0.0%	2.0%	0.0%	5.0%
Other Sturminster Newton	1.4%	1.4%	0.0%	1.4%	0.0%	5.0%
Gillingham						
Asda, Gillingham	10.5%	10.5%	0.0%	10.5%	4.1%	20.0%
Lidl, Gillingham	14.3%	14.3%	6.3%	14.3%	4.0%	20.0%
Waitrose, Gillingham	19.2%	19.2%	1.3%	19.2%	14.0%	20.0%
Aldi, Gillingham (opened 2020)	10.0%	10.0%	4.0%	10.0%	3.0%	20.0%
Other Gillingham	0.8%	0.8%	0.0%	0.8%	0.0%	10.0%
Other Zone 10	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Zone 9						
Stalbridge						
Dike & Son, Stalbridge	0.0%	0.0%	4.7%	0.0%	0.0%	5.0%
Other Stalbridge	0.0%	0.0%	1.1%	0.0%	0.0%	5.0%
Sherborne						
Sainsbury's, Sherborne	1.3%	1.3%	20.7%	1.3%	0.0%	25.0%
Waitrose, Sherborne	0.0%	0.0%	3.8%	0.0%	0.0%	25.0%
Sherborne	0.0%	0.0%	0.7%	0.0%	0.0%	15.0%
Zone 11						
Shaftesbury						
Co-op, Shaftesbury	0.0%	0.0%	0.0%	0.0%	1.4%	25.0%
Tesco, Shaftesbury	4.2%	4.2%	3.0%	4.2%	37.0%	25.0%
Lidl, Shaftesbury (opened 2021)	1.0%	1.0%	1.0%	1.0%	20.0%	25.0%
Other Shaftesbury	0.6%	0.6%	0.0%	0.6%	0.0%	15.0%
Other Zone 11	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Zones 9, 10 and 11 sub-total	**65.3%**	**65.3%**	**46.6%**	**65.3%**	**83.5%**	
Blandford Forum						
Tesco, Blandford Forum	16.8%	16.8%	2.1%	16.8%	0.0%	65.0%
Marks & Spencer, Blandford Forum	0.6%	0.6%	0.0%	0.6%	0.0%	65.0%
Other Blandford Forum	0.0%	0.0%	0.0%	0.0%	0.0%	65.0%
Wincanton						
Lidl, Wincanton	1.2%	1.2%	5.6%	1.2%	0.4%	55.0%
Morrison, Wincanton	4.3%	4.3%	15.1%	4.3%	2.1%	55.0%
Other Wincanton	0.0%	0.0%	0.0%	0.0%	0.0%	55.0%
Yeovil						
Asda, Yeovil	0.0%	0.0%	5.5%	0.0%	0.0%	85.0%
Tesco Extra, Yeovil	0.0%	0.0%	7.6%	0.0%	0.0%	85.0%
Lidl, Yeovil	0.0%	0.0%	1.6%	0.0%	0.0%	85.0%
Morrisons, Yeovil	0.0%	0.0%	3.5%	0.0%	0.0%	85.0%
Other Yeovil	0.0%	0.0%	0.7%	0.0%	0.0%	85.0%
Elsewhere	11.8%	11.8%	11.7%	11.8%	14.0%	90.0%
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	

Source: NEMS Household Survey 2017 and Lichfields' adjustments for completions since 2017

Table 4B: Main-food shopping - other regular destination market shares (%)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow
Zone 10						
Marnhull						
Spar/Robin Hill Stores, Marnhull	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Sturminster Newton						
Co-op, Sturminster Newton	1.2%	1.2%	0.0%	1.2%	0.0%	5.0%
Other Sturminster Newton	14.2%	14.2%	0.0%	14.2%	0.0%	5.0%
Gillingham						
Asda, Gillingham	18.6%	18.6%	27.4%	18.6%	7.0%	20.0%
Lidl, Gillingham	17.9%	17.9%	4.4%	17.9%	15.0%	20.0%
Waitrose, Gillingham	8.2%	8.2%	0.0%	8.2%	21.0%	20.0%
Aldi, Gillingham (opened 2020)	13.0%	13.0%	3.0%	13.0%	11.0%	20.0%
Other Gillingham	0.8%	0.8%	0.0%	0.8%	0.0%	10.0%
Other Zone 10	0.9%	0.9%	0.0%	0.9%	0.0%	5.0%
Zone 9						
Stalbridge						
Dike & Son, Stalbridge	0.9%	0.9%	1.4%	0.9%	0.0%	5.0%
Other Stalbridge	0.9%	0.9%	6.6%	0.9%	0.0%	5.0%
Sherborne						
Sainsbury's, Sherborne	1.1%	1.1%	8.9%	1.1%	4.4%	25.0%
Waitrose, Sherborne	0.0%	0.0%	11.8%	0.0%	0.0%	25.0%
Sherborne	0.0%	0.0%	0.0%	0.0%	0.0%	15.0%
Zone 11						
Shaftesbury						
Co-op, Shaftesbury	0.0%	0.0%	0.0%	0.0%	0.0%	25.0%
Tesco, Shaftesbury	7.0%	7.0%	0.0%	7.0%	15.0%	25.0%
Lidl, Shaftesbury (opened 2021)	2.0%	2.0%	0.0%	2.0%	3.5%	25.0%
Other Shaftesbury	0.0%	0.0%	1.4%	0.0%	0.0%	15.0%
Other Zone 11	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Zones 9, 10 and 11 sub-total	**86.7%**	**86.7%**	**64.9%**	**86.7%**	**76.9%**	
Blandford Forum						
Tesco, Blandford Forum	2.4%	2.4%	0.0%	2.4%	0.0%	65.0%
Marks & Spencer, Blandford Forum	7.1%	7.1%	0.0%	7.1%	0.0%	65.0%
Other Blandford Forum	0.0%	0.0%	0.0%	0.0%	2.7%	65.0%
Wincanton						
Lidl, Wincanton	0.7%	0.7%	4.3%	0.7%	4.3%	55.0%
Morrison, Wincanton	2.1%	2.1%	8.1%	2.1%	1.5%	55.0%
Other Wincanton	0.0%	0.0%	0.0%	0.0%	0.0%	55.0%
Yeovil						
Asda, Yeovil	0.0%	0.0%	2.4%	0.0%	0.0%	85.0%
Tesco Extra, Yeovil	0.0%	0.0%	2.2%	0.0%	0.0%	85.0%
Lidl, Yeovil	0.0%	0.0%	4.8%	0.0%	0.0%	85.0%
Morrisons, Yeovil	0.0%	0.0%	9.0%	0.0%	0.0%	85.0%
Other Yeovil	0.0%	0.0%	2.8%	0.0%	0.0%	85.0%
Elsewhere	1.0%	1.0%	1.5%	1.0%	14.6%	90.0%
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	

Source: NEMS Household Survey 2017 and Lichfields' adjustments for completions since 2017

Table 4C: Top-up food shopping - normal destination market shares (%)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow
Zone 10						
Marnhull						
Spar/Robin Hill Stores, Marnhull	30.0%	10.0%	0.0%	1.0%	0.0%	5.0%
Sturminster Newton						
Co-op, Sturminster Newton	25.8%	30.0%	1.8%	37.4%	0.0%	5.0%
Other Sturminster Newton	2.6%	5.7%	2.8%	3.9%	2.0%	5.0%
Gillingham						
Asda, Gillingham	5.4%	8.0%	0.0%	7.9%	0.0%	20.0%
Lidl, Gillingham	6.0%	8.0%	2.0%	8.7%	3.7%	20.0%
Waitrose, Gillingham	7.0%	8.0%	0.0%	10.0%	2.5%	20.0%
Aldi, Gillingham (opened 2020)	4.0%	8.0%	1.0%	5.0%	3.0%	20.0%
Other Gillingham	6.3%	8.0%	0.0%	9.2%	3.8%	10.0%
Other Zone 10	5.6%	7.0%	0.0%	8.1%	0.0%	5.0%
Zone 9						
Stalbridge						
Dike & Son, Stalbridge	1.3%	1.3%	15.3%	1.9%	0.0%	5.0%
Other Stalbridge	0.0%	0.0%	9.9%	0.0%	0.0%	5.0%
Sherborne						
Sainsbury's, Sherborne	1.3%	1.3%	10.1%	1.9%	0.0%	25.0%
Waitrose, Sherborne	0.0%	0.0%	8.0%	0.0%	0.0%	25.0%
Sherborne	0.0%	0.0%	15.0%	0.0%	0.0%	15.0%
Zone 11						
Shaftesbury						
Co-op, Shaftesbury	0.0%	0.0%	0.0%	0.0%	15.6%	25.0%
Tesco, Shaftesbury	0.0%	0.0%	2.5%	0.0%	17.0%	25.0%
Lidl, Shaftesbury (opened 2021)	0.0%	0.0%	0.0%	0.0%	4.0%	25.0%
Other Shaftesbury	0.0%	0.0%	0.0%	0.0%	6.0%	15.0%
Other Zone 11	0.0%	0.0%	0.0%	0.0%	31.7%	5.0%
Zones 9, 10 and 11 sub-total	**95.3%**	**95.3%**	**68.4%**	**95.0%**	**89.3%**	
Blandford Forum						
Tesco, Blandford Forum	0.0%	0.0%	0.0%	0.0%	0.0%	65.0%
Marks & Spencer, Blandford Forum	0.0%	0.0%	0.0%	0.0%	0.0%	65.0%
Other Blandford Forum	0.0%	0.0%	0.0%	0.0%	0.0%	65.0%
Wincanton						
Lidl, Wincanton	0.0%	0.0%	0.0%	0.0%	4.1%	55.0%
Morrison, Wincanton	1.7%	1.7%	17.6%	1.8%	1.2%	55.0%
Other Wincanton	1.8%	1.8%	0.0%	1.9%	1.3%	55.0%
Yeovil						
Asda, Yeovil	0.0%	0.0%	4.8%	0.0%	0.0%	85.0%
Tesco Extra, Yeovil	0.0%	0.0%	1.4%	0.0%	0.0%	85.0%
Lidl, Yeovil	0.0%	0.0%	1.8%	0.0%	0.0%	85.0%
Morrisons, Yeovil	0.0%	0.0%	0.0%	0.0%	0.0%	85.0%
Other Yeovil	0.0%	0.0%	4.7%	0.0%	0.0%	85.0%
Elsewhere	1.2%	1.2%	1.3%	1.3%	4.1%	90.0%
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	

Source: NEMS Household Survey 2017 and Lichfields' adjustments for completions since 2017

Table 4D: Top-up food shopping - other regular destination market shares (%)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow
Zone 10						
Marnhull						
Spar/Robin Hill Stores, Marnhull	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Sturminster Newton						
Co-op, Sturminster Newton	0.0%	0.0%	4.8%	0.0%	0.0%	5.0%
Other Sturminster Newton	8.1%	8.0%	4.8%	8.4%	0.0%	5.0%
Gillingham						
Asda, Gillingham	13.0%	12.0%	0.0%	13.0%	0.0%	20.0%
Lidl, Gillingham	16.0%	15.0%	0.0%	15.0%	0.0%	20.0%
Waitrose, Gillingham	33.0%	32.0%	0.0%	33.0%	0.0%	20.0%
Aldi, Gillingham (opened 2020)	4.0%	8.0%	1.0%	5.0%	3.0%	20.0%
Other Gillingham	4.0%	4.0%	0.0%	4.2%	8.0%	10.0%
Other Zone 10	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Zone 9						
Stalbridge						
Dike & Son, Stalbridge	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%
Other Stalbridge	3.1%	3.0%	0.0%	3.0%	0.0%	5.0%
Sherborne						
Sainsbury's, Sherborne	0.0%	0.0%	23.4%	0.0%	0.0%	25.0%
Waitrose, Sherborne	0.0%	0.0%	29.0%	0.0%	0.0%	25.0%
Sherborne	0.0%	0.0%	6.5%	0.0%	0.0%	15.0%
Zone 11						
Shaftesbury						
Co-op, Shaftesbury	0.0%	0.0%	0.0%	0.0%	0.0%	25.0%
Tesco, Shaftesbury	4.2%	4.0%	0.0%	4.0%	44.0%	25.0%
Lidl, Shaftesbury (opened 2021)	0.0%	0.0%	0.0%	0.0%	4.0%	25.0%
Other Shaftesbury	0.0%	0.0%	0.0%	0.0%	19.0%	15.0%
Other Zone 11	0.0%	0.0%	0.0%	0.0%	10.4%	5.0%
Zones 9, 10 and 11 sub-total	**85.4%**	**86.0%**	**69.5%**	**85.6%**	**88.4%**	
Blandford Forum						
Tesco, Blandford Forum	0.0%	0.0%	0.0%	0.0%	0.0%	65.0%
Marks & Spencer, Blandford Forum	3.1%	3.0%	0.0%	3.1%	11.6%	65.0%
Other Blandford Forum	4.2%	4.0%	0.0%	4.2%	0.0%	65.0%
Wincanton						
Lidl, Wincanton	0.0%	0.0%	0.0%	0.0%	0.0%	55.0%
Morrison, Wincanton	4.2%	4.0%	0.0%	4.0%	0.0%	55.0%
Other Wincanton	3.1%	3.0%	0.0%	3.1%	0.0%	55.0%
Yeovil						
Asda, Yeovil	0.0%	0.0%	0.0%	0.0%	0.0%	85.0%
Tesco Extra, Yeovil	0.0%	0.0%	0.0%	0.0%	0.0%	85.0%
Lidl, Yeovil	0.0%	0.0%	10.3%	0.0%	0.0%	85.0%
Morrisons, Yeovil	0.0%	0.0%	7.7%	0.0%	0.0%	85.0%
Other Yeovil	0.0%	0.0%	4.8%	0.0%	0.0%	85.0%
Elsewhere	0.0%	0.0%	7.7%	0.0%	0.0%	90.0%
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	

Source: NEMS Household Survey 2017 and Lichfields' adjustments for completions since 2017

Table 5A: Main-food shopping - normal destination expenditure flows (£M)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow	Total
Expenditure 2025	**3.16**	**2.08**	**47.44**	**34.54**	**30.15**		**117.38**
Zone 10							
Marnhull							
Spar/Robin Hill Stores, Marnhull	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Sturminster Newton							
Co-op, Sturminster Newton	0.06	0.04	0.00	0.69	0.00	0.08	**0.84**
Other Sturminster Newton	0.04	0.03	0.00	0.48	0.00	0.06	**0.59**
Gillingham							
Asda, Gillingham	0.33	0.22	0.00	3.63	1.24	1.57	**6.77**
Lidl, Gillingham	0.45	0.30	2.99	4.94	1.21	2.77	**12.35**
Waitrose, Gillingham	0.61	0.40	0.62	6.63	4.22	3.52	**15.60**
Aldi, Gillingham (opened 2020)	0.32	0.21	1.90	3.45	0.90	1.90	**8.48**
Other Gillingham	0.03	0.02	0.00	0.28	0.00	0.05	**0.35**
Other Zone 10	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Zone 9							
Stalbridge							
Dike & Son, Stalbridge	0.00	0.00	2.23	0.00	0.00	0.12	**2.35**
Other Stalbridge	0.00	0.00	0.52	0.00	0.00	0.03	**0.55**
Sherborne							
Sainsbury's, Sherborne	0.04	0.03	9.82	0.45	0.00	3.47	**13.78**
Waitrose, Sherborne	0.00	0.00	1.80	0.00	0.00	0.60	**2.40**
Sherborne	0.00	0.00	0.33	0.00	0.00	0.06	**0.39**
Zone 11							
Shaftesbury							
Co-op, Shaftesbury	0.00	0.00	0.00	0.00	0.42	0.14	**0.56**
Tesco, Shaftesbury	0.13	0.09	1.42	1.45	11.16	4.84	**19.00**
Lidl, Shaftesbury (opened 2021)	0.03	0.02	0.47	0.35	6.03	2.32	**9.20**
Other Shaftesbury	0.02	0.01	0.00	0.21	0.00	0.05	**0.28**
Other Zone 11	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Zones 9, 10 and 11 sub-total	**2.06**	**1.36**	**22.11**	**22.56**	**25.18**	**21.59**	**93.49**
Blandford Forum							
Tesco, Blandford Forum	0.53	0.35	1.00	5.80	0.00	14.61	**21.94**
Marks & Spencer, Blandford Forum	0.02	0.01	0.00	0.21	0.00	0.46	**0.68**
Other Blandford Forum	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Wincanton							
Lidl, Wincanton	0.04	0.02	2.66	0.41	0.12	4.00	**7.23**
Morrison, Wincanton	0.14	0.09	7.16	1.49	0.63	11.71	**21.13**
Other Wincanton	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Yeovil							
Asda, Yeovil	0.00	0.00	2.61	0.00	0.00	14.79	**17.40**
Tesco Extra, Yeovil	0.00	0.00	3.61	0.00	0.00	20.43	**24.04**
Lidl, Yeovil	0.00	0.00	0.76	0.00	0.00	4.30	**5.06**
Morrisons, Yeovil	0.00	0.00	1.66	0.00	0.00	9.41	**11.07**
Other Yeovil	0.00	0.00	0.33	0.00	0.00	1.88	**2.21**
Elsewhere	0.37	0.25	5.55	4.08	4.22	130.44	**144.67**
TOTAL	**3.16**	**2.08**	**47.44**	**34.54**	**30.15**	**233.62**	**348.92**

Source: Table 3A and Table 4A

Table 5B: Main-food shopping - other regular expenditure flows (£M)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow	Total
Expenditure 2025	**1.05**	**0.69**	**15.81**	**11.51**	**10.05**		**39.13**
Zone 10							
Marnhull							
Spar/Robin Hill Stores, Marnhull	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Sturminster Newton							
Co-op, Sturminster Newton	0.01	0.01	0.00	0.14	0.00	0.02	**0.17**
Other Sturminster Newton	0.15	0.10	0.00	1.64	0.00	0.20	**1.98**
Gillingham							
Asda, Gillingham	0.20	0.13	4.33	2.14	0.70	2.00	**9.38**
Lidl, Gillingham	0.19	0.12	0.70	2.06	1.51	1.27	**5.72**
Waitrose, Gillingham	0.09	0.06	0.00	0.94	2.11	0.86	**4.00**
Aldi, Gillingham (opened 2020)	0.14	0.09	0.47	1.50	1.11	0.92	**4.13**
Other Gillingham	0.01	0.01	0.00	0.09	0.00	0.02	**0.12**
Other Zone 10	0.01	0.01	0.00	0.10	0.00	0.01	**0.13**
Zone 9							
Stalbridge							
Dike & Son, Stalbridge	0.01	0.01	0.22	0.10	0.00	0.02	**0.36**
Other Stalbridge	0.01	0.01	1.04	0.10	0.00	0.07	**1.22**
Sherborne							
Sainsbury's, Sherborne	0.01	0.01	1.41	0.13	0.44	0.67	**2.66**
Waitrose, Sherborne	0.00	0.00	1.87	0.00	0.00	0.62	**2.49**
Sherborne	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Zone 11							
Shaftesbury							
Co-op, Shaftesbury	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Tesco, Shaftesbury	0.07	0.05	0.00	0.81	1.51	0.86	**3.25**
Lidl, Shaftesbury (opened 2021)	0.02	0.01	0.00	0.23	0.35	0.22	**0.82**
Other Shaftesbury	0.00	0.00	0.22	0.00	0.00	0.04	**0.26**
Other Zone 11	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Zones 9, 10 and 11 sub-total	**0.91**	**0.60**	**10.26**	**9.98**	**7.73**	**7.79**	**36.68**
Blandford Forum							
Tesco, Blandford Forum	0.03	0.02	0.00	0.28	0.00	0.61	**0.91**
Marks & Spencer, Blandford Forum	0.07	0.05	0.00	0.82	0.00	1.80	**2.69**
Other Blandford Forum	0.00	0.00	0.00	0.00	0.27	0.50	**0.78**
Wincanton							
Lidl, Wincanton	0.01	0.00	0.68	0.08	0.43	1.48	**2.68**
Morrison, Wincanton	0.02	0.01	1.28	0.24	0.15	2.10	**3.80**
Other Wincanton	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Yeovil							
Asda, Yeovil	0.00	0.00	0.38	0.00	0.00	2.15	**2.53**
Tesco Extra, Yeovil	0.00	0.00	0.35	0.00	0.00	1.97	**2.32**
Lidl, Yeovil	0.00	0.00	0.76	0.00	0.00	4.30	**5.06**
Morrisons, Yeovil	0.00	0.00	1.42	0.00	0.00	8.07	**9.49**
Other Yeovil	0.00	0.00	0.44	0.00	0.00	2.51	**2.95**
Elsewhere	0.01	0.01	0.24	0.12	1.47	16.54	**18.37**
TOTAL	**1.05**	**0.69**	**15.81**	**11.51**	**10.05**	**49.83**	**88.26**

Source: Table 3A and Table 4B

Table 5C: Top-up shopping - usual destination expenditure flows (£M)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow	Total
Expenditure 2025	**1.35**	**0.89**	**20.33**	**14.80**	**12.92**		**50.30**
Zone 10							
Marnhull							
Spar/Robin Hill Stores, Marnhull	0.41	0.09	0.00	0.15	0.00	0.12	**0.68**
Sturminster Newton							
Co-op, Sturminster Newton	0.35	0.27	0.37	5.54	0.00	0.61	**6.86**
Other Sturminster Newton	0.04	0.05	0.57	0.58	0.26	0.13	**1.57**
Gillingham							
Asda, Gillingham	0.07	0.07	0.00	1.17	0.00	0.40	**1.64**
Lidl, Gillingham	0.08	0.07	0.41	1.29	0.48	0.65	**2.91**
Waitrose, Gillingham	0.09	0.07	0.00	1.48	0.32	0.56	**2.46**
Aldi, Gillingham (opened 2020)	0.05	0.07	0.20	0.74	0.39	0.44	**1.82**
Other Gillingham	0.09	0.07	0.00	1.36	0.49	0.29	**2.23**
Other Zone 10	0.08	0.06	0.00	1.20	0.00	0.13	**1.41**
Zone 9							
Stalbridge							
Dike & Son, Stalbridge	0.02	0.01	3.11	0.28	0.00	0.19	**3.60**
Other Stalbridge	0.00	0.00	2.01	0.00	0.00	0.11	**2.12**
Sherborne							
Sainsbury's, Sherborne	0.02	0.01	2.05	0.28	0.00	0.80	**3.15**
Waitrose, Sherborne	0.00	0.00	1.63	0.00	0.00	0.54	**2.17**
Sherborne	0.00	0.00	3.05	0.00	0.00	0.54	**3.59**
Zone 11							
Shaftesbury							
Co-op, Shaftesbury	0.00	0.00	0.00	0.00	2.02	0.67	**2.69**
Tesco, Shaftesbury	0.00	0.00	0.51	0.00	2.20	0.90	**3.61**
Lidl, Shaftesbury (opened 2021)	0.00	0.00	0.00	0.00	0.52	0.17	**0.69**
Other Shaftesbury	0.00	0.00	0.00	0.00	0.78	0.14	**0.91**
Other Zone 11	0.00	0.00	0.00	0.00	4.10	0.22	**4.31**
Zones 9, 10 and 11 sub-total	**1.29**	**0.85**	**13.91**	**14.06**	**11.54**	**7.62**	**48.42**
Blandford Forum							
Tesco, Blandford Forum	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Marks & Spencer, Blandford Forum	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Other Blandford Forum	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Wincanton							
Lidl, Wincanton	0.00	0.00	0.00	0.00	0.53	0.65	**1.18**
Morrison, Wincanton	0.02	0.02	3.58	0.27	0.16	4.95	**8.97**
Other Wincanton	0.02	0.02	0.00	0.28	0.17	0.61	**1.09**
Yeovil							
Asda, Yeovil	0.00	0.00	0.98	0.00	0.00	5.53	**6.51**
Tesco Extra, Yeovil	0.00	0.00	0.28	0.00	0.00	1.61	**1.90**
Lidl, Yeovil	0.00	0.00	0.37	0.00	0.00	2.07	**2.44**
Morrisons, Yeovil	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Other Yeovil	0.00	0.00	0.96	0.00	0.00	5.42	**6.37**
Elsewhere	0.02	0.01	0.26	0.19	0.53	9.13	**10.14**
TOTAL	**1.35**	**0.89**	**20.33**	**14.80**	**12.92**	**37.59**	**87.01**

Source: Table 3A and Table 4C

Table 5D: Top-up shopping - other regular destination expenditure flows (£M)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow	Total
Expenditure 2025	**0.45**	**0.30**	**6.78**	**4.93**	**4.31**		**16.77**
Zone 10							
Marnhull							
Spar/Robin Hill Stores, Marnhull	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Sturminster Newton							
Co-op, Sturminster Newton	0.00	0.00	0.33	0.00	0.00	0.02	**0.34**
Other Sturminster Newton	0.04	0.02	0.33	0.41	0.00	0.07	**0.84**
Gillingham							
Asda, Gillingham	0.06	0.04	0.00	0.64	0.00	0.22	**0.92**
Lidl, Gillingham	0.07	0.04	0.00	0.74	0.00	0.26	**1.07**
Waitrose, Gillingham	0.15	0.09	0.00	1.63	0.00	0.56	**2.34**
Aldi, Gillingham (opened 2020)	0.02	0.02	0.07	0.25	0.13	0.15	**0.61**
Other Gillingham	0.02	0.01	0.00	0.21	0.34	0.08	**0.65**
Other Zone 10	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Zone 9							
Stalbridge							
Dike & Son, Stalbridge	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Other Stalbridge	0.01	0.01	0.00	0.15	0.00	0.02	**0.18**
Sherborne							
Sainsbury's, Sherborne	0.00	0.00	1.59	0.00	0.00	0.53	**2.11**
Waitrose, Sherborne	0.00	0.00	1.97	0.00	0.00	0.66	**2.62**
Sherborne	0.00	0.00	0.44	0.00	0.00	0.08	**0.52**
Zone 11							
Shaftesbury							
Co-op, Shaftesbury	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Tesco, Shaftesbury	0.02	0.01	0.00	0.20	1.90	0.72	**2.83**
Lidl, Shaftesbury (opened 2021)	0.00	0.00	0.00	0.00	0.17	0.06	**0.23**
Other Shaftesbury	0.00	0.00	0.00	0.00	0.82	0.14	**0.96**
Other Zone 11	0.00	0.00	0.00	0.00	0.45	0.02	**0.47**
Zones 9, 10 and 11 sub-total	**0.39**	**0.26**	**4.71**	**4.22**	**3.81**	**3.57**	**16.70**
Blandford Forum							
Tesco, Blandford Forum	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Marks & Spencer, Blandford Forum	0.01	0.01	0.00	0.15	0.50	1.26	**1.93**
Other Blandford Forum	0.02	0.01	0.00	0.21	0.00	0.45	**0.68**
Wincanton							
Lidl, Wincanton	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Morrison, Wincanton	0.02	0.01	0.00	0.20	0.00	0.29	**0.51**
Other Wincanton	0.01	0.01	0.00	0.15	0.00	0.22	**0.39**
Yeovil							
Asda, Yeovil	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Tesco Extra, Yeovil	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Lidl, Yeovil	0.00	0.00	0.70	0.00	0.00	3.96	**4.65**
Morrisons, Yeovil	0.00	0.00	0.52	0.00	0.00	2.96	**3.48**
Other Yeovil	0.00	0.00	0.33	0.00	0.00	1.84	**2.17**
Elsewhere	0.00	0.00	0.52	0.00	0.00	4.70	**5.22**
TOTAL	**0.45**	**0.30**	**6.78**	**4.93**	**4.31**	**19.26**	**35.73**

Source: Table 3A and Table 4C

Table 5E: Combined main and top-up shopping expenditure flows (£M)

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow	Total
Expenditure 2025	**6.02**	**3.96**	**90.37**	**65.80**	**57.43**		**223.58**
Zone 10							
Marnhull							
Spar/Robin Hill Stores, Marnhull	0.41	0.09	0.00	0.15	0.00	0.12	**0.77**
Sturminster Newton							
Co-op, Sturminster Newton	0.42	0.32	0.69	6.35	0.00	0.73	**8.50**
Other Sturminster Newton	0.29	0.22	0.89	3.41	0.26	0.49	**5.56**
Gillingham							
Asda, Gillingham	0.68	0.46	5.20	7.77	2.00	4.49	**20.60**
Lidl, Gillingham	0.80	0.54	4.03	9.11	3.41	5.02	**22.92**
Waitrose, Gillingham	0.91	0.61	0.58	10.43	6.80	5.44	**24.76**
Aldi, Gillingham (opened 2020)	0.53	0.40	2.61	6.01	2.69	3.46	**15.69**
Other Gillingham	0.12	0.09	0.00	1.73	0.49	0.36	**2.80**
Other Zone 10	0.09	0.07	0.00	1.32	0.00	0.15	**1.63**
Zone 9							
Stalbridge							
Dike & Son, Stalbridge	0.03	0.02	5.46	0.41	0.00	0.33	**6.24**
Other Stalbridge	0.03	0.02	3.75	0.27	0.00	0.23	**4.30**
Sherborne							
Sainsbury's, Sherborne	0.07	0.05	14.49	0.85	0.53	5.38	**21.37**
Waitrose, Sherborne	0.00	0.00	7.51	0.00	0.00	2.50	**10.02**
Sherborne	0.00	0.00	3.80	0.00	0.00	0.67	**4.47**
Zone 11							
Shaftesbury							
Co-op, Shaftesbury	0.00	0.00	0.00	0.00	2.41	0.80	**3.21**
Tesco, Shaftesbury	0.23	0.15	1.84	2.52	16.31	7.17	**28.22**
Lidl, Shaftesbury (opened 2021)	0.05	0.04	0.44	0.60	6.74	2.66	**10.53**
Other Shaftesbury	0.02	0.01	0.27	0.19	1.59	0.38	**2.46**
Other Zone 11	0.00	0.00	0.00	0.00	4.54	0.24	**4.78**
Zones 9, 10 and 11 sub-total	**4.68**	**3.08**	**51.57**	**51.11**	**47.78**	**40.61**	**198.83**
Blandford Forum							
Tesco, Blandford Forum	0.53	0.35	0.93	5.75	0.00	14.37	**21.92**
Marks & Spencer, Blandford Forum	0.12	0.08	0.00	1.33	0.50	3.85	**5.87**
Other Blandford Forum	0.02	0.01	0.00	0.21	0.33	1.06	**1.62**
Wincanton							
Lidl, Wincanton	0.04	0.03	3.30	0.48	1.16	6.16	**11.17**
Morrison, Wincanton	0.20	0.13	11.80	2.14	0.93	18.70	**33.89**
Other Wincanton	0.04	0.02	0.00	0.43	0.17	0.84	**1.50**
Yeovil							
Asda, Yeovil	0.00	0.00	3.87	0.00	0.00	21.91	**25.78**
Tesco Extra, Yeovil	0.00	0.00	4.07	0.00	0.00	23.05	**27.12**
Lidl, Yeovil	0.00	0.00	2.68	0.00	0.00	15.21	**17.89**
Morrisons, Yeovil	0.00	0.00	3.78	0.00	0.00	21.42	**25.20**
Other Yeovil	0.00	0.00	2.12	0.00	0.00	12.03	**14.15**
Elsewhere	0.38	0.25	6.25	4.14	6.23	155.43	**172.67**
TOTAL	**6.00**	**3.94**	**90.37**	**65.59**	**57.09**	**334.61**	**557.61**

Source: Tables 5A to 5D

Table 6: Combined 2030 main and top-up shopping expenditure flows (£M) - without appeal proposals

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow	Total
Expenditure 2030	**7.91**	**3.91**	**91.00**	**65.45**	**57.34**		**225.61**
Zone 10							
Marnhull							
Spar / Robin Hill Stores, Marnhull	0.53	0.09	0.00	0.15	0.00	0.13	**0.90**
Sturminster Newton							
Co-op, Sturminster Newton	0.56	0.31	0.70	6.33	0.00	0.73	**8.63**
Other Sturminster Newton	0.35	0.20	0.90	3.09	0.26	0.45	**5.25**
Gillingham							
Asda, Gillingham	0.87	0.45	4.36	7.54	1.94	4.24	**19.39**
Lidl, Gillingham	1.04	0.53	4.12	8.98	3.19	5.00	**22.86**
Waitrose, Gillingham	1.23	0.61	0.62	10.63	6.64	5.55	**25.29**
Aldi, Gillingham (opened 2020)	0.69	0.39	2.66	5.91	2.52	3.43	**15.60**
Other Gillingham	0.18	0.10	0.00	1.93	0.83	0.44	**3.49**
Other Zone 10	0.11	0.07	0.00	1.30	0.00	0.15	**1.62**
Zone 9							
Stalbridge							
Dike & Son, Stalbridge	0.04	0.02	5.60	0.38	0.00	0.34	**6.37**
Other Stalbridge	0.03	0.01	3.60	0.25	0.00	0.22	**4.12**
Sherborne							
Sainsbury's, Sherborne	0.09	0.05	14.97	0.85	0.44	5.51	**21.92**
Waitrose, Sherborne	0.00	0.00	7.31	0.00	0.00	2.44	**9.75**
Sherborne	0.00	0.00	3.85	0.00	0.00	0.68	**4.53**
Zone 11							
Shaftesbury							
Co-op, Shaftesbury	0.00	0.00	0.00	0.00	2.43	0.81	**3.25**
Tesco, Shaftesbury	0.30	0.15	1.95	2.44	16.73	7.33	**28.89**
Lidl, Shaftesbury (opened 2021)	0.07	0.03	0.48	0.57	7.06	2.77	**10.99**
Other Shaftesbury	0.02	0.01	0.22	0.21	1.59	0.38	**2.43**
Other Zone 11	0.00	0.00	0.00	0.00	4.54	0.24	**4.78**
Zones 9, 10 and 11 sub-total	**6.12**	**3.02**	**51.35**	**50.56**	**48.17**	**40.83**	**200.05**
Blandford Forum							
Tesco, Blandford Forum	0.73	0.36	1.00	6.05	0.00	15.48	**23.63**
Marks & Spencer, Blandford Forum	0.14	0.07	0.00	1.17	0.50	3.56	**5.45**
Other Blandford Forum	0.02	0.01	0.00	0.21	0.27	0.97	**1.48**
Wincanton							
Lidl, Wincanton	0.06	0.03	3.36	0.49	1.08	6.17	**11.19**
Morrison, Wincanton	0.26	0.13	12.11	2.18	0.94	19.22	**34.83**
Other Wincanton	0.05	0.02	0.00	0.43	0.17	0.85	**1.52**
Yeovil							
Asda, Yeovil	0.00	0.00	3.99	0.00	0.00	22.62	**26.62**
Tesco Extra, Yeovil	0.00	0.00	4.27	0.00	0.00	24.18	**28.45**
Lidl, Yeovil	0.00	0.00	2.60	0.00	0.00	14.73	**17.34**
Morrisons, Yeovil	0.00	0.00	3.63	0.00	0.00	20.57	**24.21**
Other Yeovil	0.00	0.00	2.07	0.00	0.00	11.73	**13.80**
Elsewhere	0.53	0.26	6.62	4.36	6.21	162.03	**180.00**
TOTAL	**7.91**	**3.91**	**91.00**	**65.45**	**57.34**	**342.95**	**568.56**

Source: Tables 3 and 5D

Table 7A: Proposed food store's convenience and comparison goods turnover

	Net sales (sq.m)	Convenience goods sales (sq.m)	Comparison goods sales (sq.m)	Convenience turnover density (£/p.s.m)	Comparison turnover density (£/p.s.m)	Convenience turnover (£m)	Comparison turnover (£m)	Total turnover (£m)
Proposed store	814	733	81	£11,000	£6,500	£8.06	£0.53	**£8.59**

Table 7B: Proposed food store's convenience goods trade draw

	Marnhull 0 - 2 km	Marnhull 2 - 4 km	Zone 9	Zone 10	Zone 11	Inflow	Total
% trade draw	45.0%	18.0%	16.0%	11.0%	5.0%	5.0%	**100.0%**
£M trade draw	£3.63	£1.45	£1.29	£0.89	£0.40	£0.40	**£8.06**

Table 8: Combined 2030 main and top-up shopping expenditure flows (£M) - with appeal proposals

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow	Total
Expenditure 2030	**7.91**	**3.91**	**91.00**	**65.45**	**57.34**		**225.61**
Zone 10							
Marnhull							
Appeal food store	*3.63*	*1.45*	*1.29*	*0.89*	*0.40*	*0.40*	***8.06***
Spar / Robin Hill Stores, Marnhull	0.37	0.07	0.00	0.15	0.00	0.13	**0.72**
Sturminster Newton							
Co-op, Sturminster Newton	0.06	0.09	0.67	6.17	0.00	0.72	**7.71**
Other Sturminster Newton	0.24	0.15	0.89	3.07	0.26	0.45	**5.06**
Gillingham							
Asda, Gillingham	0.35	0.24	4.24	7.41	1.92	4.21	**18.37**
Lidl, Gillingham	0.42	0.28	4.00	8.83	3.16	4.97	**21.66**
Waitrose, Gillingham	0.50	0.32	0.60	10.45	6.58	5.52	**23.98**
Aldi, Gillingham (opened 2020)	0.28	0.21	2.59	5.81	2.50	3.41	**14.79**
Other Gillingham	0.13	0.08	0.00	1.91	0.83	0.44	**3.39**
Other Zone 10	0.08	0.05	0.00	1.28	0.00	0.15	**1.56**
Zone 9							
Stalbridge							
Dike & Son, Stalbridge	0.00	0.01	5.37	0.37	0.00	0.33	**6.08**
Other Stalbridge	0.02	0.01	3.55	0.25	0.00	0.22	**4.05**
Sherborne							
Sainsbury's, Sherborne	0.06	0.03	14.76	0.85	0.44	5.50	**21.65**
Waitrose, Sherborne	0.00	0.00	7.21	0.00	0.00	2.43	**9.64**
Sherborne	0.00	0.00	3.82	0.00	0.00	0.68	**4.50**
Zone 11							
Shaftesbury							
Co-op, Shaftesbury	0.00	0.00	0.00	0.00	2.41	0.81	**3.22**
Tesco, Shaftesbury	0.12	0.08	1.89	2.40	16.57	7.29	**28.35**
Lidl, Shaftesbury (opened 2021)	0.03	0.02	0.46	0.56	6.99	2.76	**10.82**
Other Shaftesbury	0.02	0.01	0.22	0.21	1.59	0.37	**2.42**
Other Zone 11	0.00	0.00	0.00	0.00	4.53	0.24	**4.76**
Zones 9, 10 and 11 sub-total	**6.31**	**3.10**	**51.57**	**50.60**	**48.18**	**41.03**	**200.80**
Blandford Forum							
Tesco, Blandford Forum	0.62	0.32	1.00	6.02	0.00	15.46	**23.42**
Marks & Spencer, Blandford Forum	0.12	0.06	0.00	1.17	0.50	3.56	**5.41**
Other Blandford Forum	0.02	0.01	0.00	0.21	0.27	0.97	**1.48**
Wincanton							
Lidl, Wincanton	0.05	0.03	3.34	0.49	1.08	6.16	**11.14**
Morrison, Wincanton	0.22	0.11	12.02	2.17	0.94	19.19	**34.66**
Other Wincanton	0.05	0.02	0.00	0.43	0.17	0.85	**1.52**
Yeovil							
Asda, Yeovil	0.00	0.00	3.96	0.00	0.00	22.59	**26.56**
Tesco Extra, Yeovil	0.00	0.00	4.24	0.00	0.00	24.15	**28.39**
Lidl, Yeovil	0.00	0.00	2.58	0.00	0.00	14.71	**17.30**
Morrisons, Yeovil	0.00	0.00	3.61	0.00	0.00	20.55	**24.15**
Other Yeovil	0.00	0.00	2.06	0.00	0.00	11.72	**13.79**
Elsewhere	0.52	0.26	6.62	4.36	6.21	162.00	**179.96**
TOTAL	**7.91**	**3.91**	**91.00**	**65.45**	**57.34**	**342.95**	**568.56**

Source: Tables 6A to 6C

Table 9: Combined 2035 main and top-up shopping expenditure flows (£M) - with appeal proposals

Destination	Marnhull 0-2km	Marnhull 2-4km	Zone 9	Zone 10	Zone 11	Inflow	Total
Expenditure 2035	**7.90**	**3.87**	**91.72**	**68.95**	**57.51**		**229.95**
Zone 10							
Marnhull							
Appeal food store	*3.62*	*1.44*	*1.30*	*0.93*	*0.40*	*0.41*	***8.11***
Spar / Robin Hill Stores, Marnhull	0.37	0.07	0.00	0.15	0.00	0.13	***0.73***
Sturminster Newton							
Co-op, Sturminster Newton	0.06	0.09	0.67	6.50	0.00	0.74	***8.06***
Other Sturminster Newton	0.24	0.15	0.90	3.23	0.26	0.46	***5.24***
Gillingham							
Asda, Gillingham	0.35	0.23	4.28	7.81	1.92	4.29	***18.89***
Lidl, Gillingham	0.42	0.28	4.04	9.30	3.17	5.06	***22.27***
Waitrose, Gillingham	0.49	0.32	0.61	11.01	6.60	5.63	***24.66***
Aldi, Gillingham (opened 2020)	0.28	0.20	2.61	6.12	2.51	3.48	***15.19***
Other Gillingham	0.13	0.08	0.00	2.01	0.83	0.45	***3.50***
Other Zone 10	0.08	0.05	0.00	1.35	0.00	0.15	***1.63***
Zone 9							
Stalbridge							
Dike & Son, Stalbridge	0.00	0.01	5.41	0.39	0.00	0.34	***6.15***
Other Stalbridge	0.02	0.01	3.58	0.26	0.00	0.22	***4.10***
Sherborne							
Sainsbury's, Sherborne	0.06	0.03	14.88	0.89	0.44	5.60	***21.91***
Waitrose, Sherborne	0.00	0.00	7.27	0.00	0.00	2.48	***9.74***
Sherborne	0.00	0.00	3.85	0.00	0.00	0.69	***4.54***
Zone 11							
Shaftesbury							
Co-op, Shaftesbury	0.00	0.00	0.00	0.00	2.42	0.82	***3.24***
Tesco, Shaftesbury	0.12	0.08	1.91	2.53	16.62	7.43	***28.68***
Lidl, Shaftesbury (opened 2021)	0.03	0.02	0.47	0.59	7.02	2.81	***10.93***
Other Shaftesbury	0.02	0.01	0.22	0.22	1.59	0.38	***2.45***
Other Zone 11	0.00	0.00	0.00	0.00	4.54	0.24	***4.78***
Zones 9, 10 and 11 sub-total	**6.30**	**3.07**	**51.98**	**53.31**	**48.32**	**41.82**	**204.81**
Blandford Forum							
Tesco, Blandford Forum	0.62	0.32	1.00	6.34	0.00	15.76	***24.05***
Marks & Spencer, Blandford Forum	0.12	0.06	0.00	1.23	0.50	3.63	***5.54***
Other Blandford Forum	0.02	0.01	0.00	0.22	0.27	0.98	***1.51***
Wincanton							
Lidl, Wincanton	0.05	0.03	3.36	0.52	1.08	6.28	***11.32***
Morrison, Wincanton	0.22	0.11	12.12	2.29	0.94	19.56	***35.24***
Other Wincanton	0.05	0.02	0.00	0.45	0.17	0.87	***1.56***
Yeovil							
Asda, Yeovil	0.00	0.00	4.00	0.00	0.00	23.03	***27.02***
Tesco Extra, Yeovil	0.00	0.00	4.27	0.00	0.00	24.62	***28.89***
Lidl, Yeovil	0.00	0.00	2.60	0.00	0.00	15.00	***17.60***
Morrisons, Yeovil	0.00	0.00	3.63	0.00	0.00	20.94	***24.58***
Other Yeovil	0.00	0.00	2.08	0.00	0.00	11.95	***14.03***
Elsewhere	0.52	0.25	6.67	4.59	6.23	165.12	***183.38***
TOTAL	**7.90**	**3.87**	**91.72**	**68.95**	**57.51**	**349.55**	**579.50**

Source: Tables 3C and 8

Table 10: Convenience goods Impact summary

Location	2025 base year turnover £m	2030 design year no development turnover £m	2030 design year with appeal proposal turnover £m	2030 trade diversion £m	% impact
	A	B	C	D	E
Zone 10					
Marnhull					
Appeal food store	n/a	n/a	8.06	n/a	n/a
Spar / Robin Hill Stores, Marnhull	0.77	0.90	0.72	-0.18	-20.3%
Sturminster Newton					
Co-op, Sturminster Newton	8.53	8.63	7.71	-0.92	-10.6%
Other Sturminster Newton	5.18	5.25	5.06	-0.19	-3.7%
Gillingham					
Asda, Gillingham	19.16	19.39	18.37	-1.02	-5.3%
Lidl, Gillingham	22.59	22.86	21.66	-1.20	-5.2%
Waitrose, Gillingham	25.02	25.29	23.98	-1.31	-5.2%
Aldi, Gillingham (opened 2020)	15.43	15.60	14.79	-0.81	-5.2%
Other Gillingham	3.46	3.49	3.39	-0.10	-2.9%
Other Zone 10	1.60	1.62	1.56	-0.06	-3.8%
Zone 9					
Stalbridge					
Dike & Son, Stalbridge	6.33	6.37	6.08	-0.29	-4.6%
Other Stalbridge	4.09	4.12	4.05	-0.07	-1.6%
Sherborne					
Sainsbury's, Sherborne	21.76	21.92	21.65	-0.27	-1.2%
Waitrose, Sherborne	9.68	9.75	9.64	-0.11	-1.1%
Sherborne	4.50	4.53	4.50	-0.03	-0.6%
Zone 11					
Shaftesbury					
Co-op, Shaftesbury	3.25	3.25	3.22	-0.03	-0.8%
Tesco, Shaftesbury	28.83	28.89	28.35	-0.54	-1.9%
Lidl, Shaftesbury	10.98	10.99	10.82	-0.16	-1.5%
Other Shaftesbury	2.43	2.43	2.42	-0.01	-0.5%
Other Zone 11	4.78	4.78	4.76	-0.01	-0.2%
Zones 9, 10 and 11 sub-total	**198.36**	**200.05**	**200.80**	**-7.31**	**-3.7%**
Blandford Forum					
Tesco, Blandford Forum	23.22	23.63	23.42	-0.21	-0.9%
Marks & Spencer, Blandford Forum	5.37	5.45	5.41	-0.04	-0.7%
Other Blandford Forum	1.47	1.48	1.48	0.00	-0.3%
Wincanton					
Lidl, Wincanton	11.12	11.19	11.14	-0.05	-0.4%
Morrison, Wincanton	34.54	34.83	34.66	-0.18	-0.5%
Other Wincanton	1.50	1.52	1.52	-0.01	-0.5%
Yeovil					
Asda, Yeovil	26.43	26.62	26.56	-0.06	-0.2%
Tesco Extra, Yeovil	28.25	28.45	28.39	-0.06	-0.2%
Lidl, Yeovil	17.22	17.34	17.30	-0.04	-0.2%
Morrisons, Yeovil	24.04	24.21	24.15	-0.05	-0.2%
Other Yeovil	13.71	13.80	13.79	-0.02	-0.1%
Elsewhere	178.66	180.00	179.96	-0.04	0.0%
Total	**563.88**	**568.56**	**568.56**	**-8.06**	

Source: Tables 5D to 8

Appendix CS5- Proofs of Evidence by Jeff Richards

Land west of Church Hill and land off Butts Close and Schoolhouse Lane, Marnhull

Appeal Reference APP/D1265/W/24/3353912

Statement on Housing Delivery and Housing Land Supply

Jeff Richards (BA (Hons) MTP MRTPI)

March 2025

Turley

Contents

Contact
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March 2025

1. Introduction

Introduction

1.1 My name is Jeff Richards, and I am a Senior Director at Turley. I have been instructed to prepare this Statement by Mr Paul Crocker, herein referred to as 'the Appellant'. It follows the Council's refusal of a hybrid planning application for retail, commercial, community and residential development on Land West of Church Hill, Marnhull and Land off Butts Close and Schoolhouse Lane, Marnhull, Dorset. A full description of the proposed development is provided within the Appellant's Statement of Case.

1.2 My Statement addresses both housing delivery and housing land supply in Dorset as a whole, and within the former North Dorset authority, within which the Appeal Site is located. This Statement also follows the agreement with Dorset Council of a Topic Paper on Housing Delivery and Housing Land Supply, which was submitted to the Planning Inspectorate on 3 March 2025 (and provided as **Core Document 4.015**)

1.3 The evidence which I have prepared and provide in this Statement for this Appeal (PINS Reference No. APP/D1265/W/24/3353912) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

Qualifications

1.4 I have an Honours Degree in Town & Country Planning and a Masters Degree in Town Planning, both from the University of the West of England. I am also a Member of the Royal Town Planning Institute and have over 20 years' experience in the planning profession.

1.5 I joined Turley as a Director in November 2014; I held the role of Head of Planning South West (Heading up Turley's Bristol and Cardiff Offices) between 2016 and 2022 and I now hold the position of Senior Director. Turley has been working in planning and property for over 40 years and is now one of the largest, leading planning practices in the UK, with offices in 14 locations.

1.6 Before my role at Turley, I practiced as a Planning Consultant with WYG for over 11 years, including as a Director from June 2013. Prior to that, I worked as a Planning Officer in Local Government at North Somerset Council for over 2 years.

1.7 I advise on a large range of development across many sectors but hold a particular specialism in residential development where I provide strategic advice on residential promotions and progress numerous applications for development. I am currently advising on sites that, in total, will deliver over 20,000 new homes.

1.8 Since the publication of the 2012 National Planning Policy Framework (NPPF), and the inclusion of previous paragraphs 47[1] and 14[2] in that NPPF, I have also developed a

[1] Setting out the requirement to demonstrate a five year supply
[2] Setting out the presumption in favour of sustainable development

particular specialism in the analysis of housing land supply, providing evidence on the requirement to demonstrate a five year housing land supply at numerous Local Plan Examinations and at Public Inquiries across the country. My experience in strategic residential development means that I am very familiar with the processes involved in promoting and progressing sites for residential development, including their overall 'deliverability' and the time it can take to secure the necessary permission before first homes will be seen. I am familiar with the housing land supply position in Dorset having been involved in appeals (and provided evidence on housing delivery and supply) in the former West Dorset, Weymouth and Portland and North Dorset areas.

1.9 In that context, my evidence in this Statement considers the Council housing delivery performance in recent years, it's current position on housing land supply, and the strength of its supply going forwards.

1.10 I have structured my Statement as follows:

Section 2 - I briefly consider the policy context relevant to the consideration of housing delivery and the determination of housing land supply, noting that this has been agreed in the Topic Paper.

Section 3 - here I consider the housing delivery in North Dorset compared to the adopted North Dorset Local Plan requirement and to the local housing need (LHN) figures in more recent years. I also consider the overall delivery in Dorset compared to LHN since the standard method calculation was introduced in 2018.

Section 4 – within this section, I consider the Council's latest housing land supply position, which is contained in its Annual Position Statement, October 2024.

Section 5 – here I consider the Council's deliverable housing land supply once the Annual Position Statement expires on 1st November 2024.

Section 6 – here I consider how long shortfalls in housing land supply in Dorset can be expected to persist and consider the step change in housing delivery that is required to meet up-to-date LHN.

Section 7 – within this section, I look at the Council's reliance on delivery from windfall sites and also its reliance on housing development coming forward on green field sites

Section 8 - I set out my concluding remarks.

2. Planning Policy Context

The Development Plan

2.1 Marnhull is located within the former North Dorset authority area which became part of the Dorset Council unitary authority on 1st April 2019.

2.2 For the former North Dorset area, the North Dorset Local Plan Part 1 was adopted in January 2016. The Local Plan has a start date of 2011 and covers the 20-year period to 2031.

2.3 Local Plan Policy 6 (Housing Distribution) states that the Council will make provision for the delivery of at least 5,700 new homes (equating to 285 per annum) between 2011 and 2031.

2.4 For the purposes of calculating housing land supply, the Local Plan is more than five years old. In addition, the formation of Dorset as a unitary authority came into effect on 1st April 2019, and so the 1st April 2024 was the fifth anniversary of its formation. As such, for the purposes of calculating five year supply, Dorset Council use a LHN figure derived from the Government's standard methodology calculation and do so on a Dorset wide basis[3].

Other Material Considerations

National Planning Policy Framework (December 2024)

2.5 The National Planning Policy Framework (NPPF) was recently updated in December 2024, with the changes affecting how one calculates five year housing land supply. Sections relevant to housing need and delivery and the consequences of not being able to demonstrate an up-to-date five year housing land supply are summarised below.

2.6 **Paragraph 11** confirms that for decision taking, where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

(ii) any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as taken as a whole having particular regard to key policies for directing development to sustainable locations, making effective use of land,

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[3] PPG Ref. ID: 68-025-20190722 – confirms that "*Planning policies adopted by predecessor authorities will remain part of the development plan for their area upon reorganisation, until they are replaced by adopted successor authority policies* ***or until the fifth anniversary of reorganisation***."

securing well-designed places and providing affordable homes, individually or in combination.

2.7 **Footnote 8** (linked in paragraph 11) states that this includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 232.

2.8 The definition of a 'deliverable' site is included at Annex 2 to the NPPF and is as follows:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

(a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

(b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

2.9 **Paragraph 61** advises that to support objectives of **significantly boosting** the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The paragraph also advises that the overall aim should be to "***meet an area's identified housing need"***, including with an appropriate mix of housing types for the local community. This is a change from the 2023 NPPF which sought as much of an area's identified housing need to be met as was possible. In my view, this last (amended) part of paragraph 61 confirms that, in Dorset, housing need, as provided by the latest standard method calculation (following the December 2024 NPPF) should be met by the Council. I consider changes to the standard method calculation relevant to Dorset in more detail, below.

2.10 **Paragraph 73** confirms that small and medium sized sites can make an important contribution to meeting the housing requirement of an area.

2.11 **Paragraph 78** confirms that Planning Authorities should maintain and update annually a 5-year supply of deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. A buffer of 5% buffer or 20% should be applied to the calculation, with the appropriate buffer determined based on an authority's performance against the Housing Delivery Test (HDT).

2.12 **Footnote 39** associated with paragraph 78 states that the local housing need should be applied unless the strategic policies which are more than five years old have been reviewed and found not to require updating. The local housing need should be calculated using the standard method set out in national planning guidance.

2.13 **Paragraph 232** indicates that existing policies of an adopted development plan should not be considered out-of-date simply because they were adopted prior to publication of the 2024 Framework. Due weight should be given to them, according to their degree of consistency with the Framework. Policies should not be regarded as out-of-date where specific criteria have been met, namely the demonstration of a five year housing land supply; compliance with the HDT as explained therein; and that the plan has been adopted within the last five years. Although the first two of these three criteria are met (due to the APS) the third criterion is not.

2.14 **Paragraph 233** confirms that, where a local planning authority has confirmed its housing land supply position for a year through a published Annual Position Statement that has been examined by the Planning Inspectorate against the previous version of this Framework, this position will stand until the Annual Position Statement expires.

Planning Practice Guidance

2.15 The PPG provides further guidance on assessing a five year housing supply including Sections on Housing Supply and Delivery, Housing and Economic Land Availability Assessment and Housing for Older People.

The Emerging Dorset Local Plan

2.16 A review of the North Dorset Local Plan had been commenced, with an Issues and Options document consulted on between November 2017 and January 2018. This looked at options to plan for a LHN figure of 366 dwellings per annum (dpa) in North Dorset.

2.17 With the formation of Dorset Council in 2019, it was decided to produce a single Dorset Council Local Plan instead. The Dorset Council Local Plan options consultation was consulted upon between January and March 2021. This looked at options to plan for a LHN figure of 1,793 dpa (which, as I will set out, is now substantially lower than up-to-date calculations of LHN).

2.18 The latest Local Development Scheme (March 2025 – **Core Document 7.1**) sets out an updated timetable for its production, including an intended site options consultation in August 2025, an intended publication consultation in August 2026, and an intended submission plan in December 2026.

2.19 The very early stages of the emerging plan production are relevant when considering the steps being taken to address shortfalls in housing land supply (which, as I will show, will be significant once the Annual Position Statement expires on 31st October 2025), how long those steps will take, and how long shortfalls in housing land supply might be expected to persist.

The Marnhull Neighbourhood Plan

2.20 A Marnhull Neighbourhood Plan is in the early stages of production. A Regulation 14 (pre-submission) consultation is being carried out between 10 February and 31 March 2025. The neighbourhood Plan, at present, has no bearing on the assessment of housing land supply, or the consequences for decision making where shortfalls in supply are identified.

3. Housing Delivery to Date in the Former North Dorset Area and across Dorset as a Whole

<u>How Housing Delivery Has Been Monitored in North Dorset</u>

3.1 Marnhull is located within the former North Dorset District Council area. The North Dorset Local Plan Part 1 was adopted in January 2016, with a plan period starting in 2011.

3.2 Housing delivery since 2011 in the former North Dorset area has, therefore, been considered against the housing requirement in Local Plan Policy 6, which required the delivery of at least 5,700 new homes (equating to 285 per annum) between 2011 and 2031. The Council calculated its housing land supply against this Local Plan housing requirement until 2021, at which point the plan became more than five years old.

3.3 Since the North Dorset Local Plan became five years old in 2021, the Council has calculated its five-year housing land supply against a LHN figure calculated using the standard method.

3.4 From 2024 (the fifth anniversary of Dorset Council), the Council transitioned to monitoring housing supply and delivery across the whole of the Dorset Council area instead of using the former district council areas.

<u>Delivery Performance in North Dorset</u>

3.5 Based on the Council's requirement figure for the purposes of calculating its five-year supply in North Dorset since the beginning of the plan period in 2021 (as summarised above), I have set out how this compares to actual delivery seen in each monitoring year. This is shown in **Table JRT1**, below. These figures have been agreed with the Council in the Housing Delivery and Housing Land Supply Topic Paper (**Core Document 4.015**, Table 3.1)

Table JRT1 - Delivery to Date in the Former North Dorset Area Against the North Dorset Local Plan and Against Local Housing Need

	Year	North Dorset LP Requirement / LHN	Delivery in the Former North Dorset Area	Shortfall/Surplus
North Dorset Local Plan Housing Requirement	2011/12	285	375	+90
	2012/13	285	144	-141
	2013/14	285	227	-58
	2014/15	285	178	-107
	2015/16	285	220	-65
	2016/17	285	142	-143
	2017/18	285	159	-126
	2018/19	285	223	-62

	2019/20	285	96	-189
	2020/21	285	198	-87
Local Housing Need	2021/22	332	298	-34
	2022/23	377	511	+134
	2023/24	373	524	+151

3.6 As can be seen from Table JRT1, from the beginning of the plan period in 2011 up to 2021 (which is when the housing requirement in the North Dorset Local Plan was used to monitor housing delivery and supply), the Council had a record of under-delivery **in 9 years of that previous 10-year period**.

3.7 As of 1st April 2021, the cumulative under-delivery against the Local Plan housing requirement (since the beginning of the plan period in 2011) stood at **852 homes**, nearly 3 years' worth of the Local Plan annual requirement of 285 homes.

3.8 In the subsequent period 2021 to 2024, the Council's delivery record has improved to more acceptable levels. When monitored against LHN in that period (which was the housing requirement figure used by Dorset Council to calculate the five-year housing land supply requirement in North Dorset), there was 1 year of under-delivery in 2021/22 and 2 years of over-delivery in 2022/23 and 2023/24.

3.9 Of note, whilst the overall LHN is now calculated on a Dorset wide basis, if the most up to date standard method calculation were applied to North Dorset, this would equate to an annual need for 571 homes. This calculation is set out in Table JRT2, below

Table JRT2 – Standard Method Local Housing Need Calculation for North Dorset		
Step	Calculation Step	Outcome
A	Total Dwelling Stock in 2019[4]	32,081 homes
B	Net additional homes 2019 to 2023 (from Table JRT1)	1,103 homes
C	Total Dwelling Stock at 2023 (A+B)	33,184
D	Affordability Adjustment[5]	2.15064
E	Total LHN (CxD)	570.9 homes/annum

3.10 If one were to compare the latest LHN figure for North Dorset of 571 dwellings per annum to actual delivery since 2011, it can be seen that the Council has never achieved

[4] The total dwelling stock numbers for North Dorset are only provided up to 2019.
[5] Calculated using an average affordability ratio of 11.056 over the last 5 years and applying this to the affordability adjustment equation set out at PPG Ref. Paragraph: 004 Reference ID: 2a-004-20241212

this scale of delivery. Indeed, the average delivery in North Dorset since 2011 has been **only 253 dwellings/annum**, less than half of the current LHN.

3.11 As part of the Topic Paper, I have also agreed the following Dorset wide delivery figures from 2019, which is when Dorset became a unitary authority in 2019:

Table 3.1: Dorset wide delivery

Table JRT3 – Dorset Wide Net Dwelling Completions	
Year	Net dwelling completions
2019/20	1,440
2020/21	1,379
2021/22	1,946
2022/23	1,772
2023/24	1,483

3.12 However, I was unable to reach agreement with Dorset Council on how this compared to the LHN in each year. I appreciate that the calculation of LHN can change in a monitoring year (due to adjustments in HDT results, or due to changes in affordability ratios), however, if one were to take the LHN requirement at the 1st April (the beginning of each monitoring year), then Table JRT4 confirms the Council's delivery performance.

Table JRT4 – Dorset Wide Housing Delivery Compared to LHN			
	Local Housing Need (homes/annum) at 1st April in Each Year	Dorset Delivery (homes)	Shortfall/Surplus (homes)
2019/20	1790	1,440	-350
2020/21	1,793	1,379	-414
2021/22	1,784	1,946	162
2022/23	1977	1,772	-205
2023/24	1907	1,483	-424

3.13 As can be seen from Table JRT4, Dorset Council has not met the LHN housing requirement in 4 of the past 5 years, with the level of under-delivery at its highest in the last monitoring year in 2024/25.

3.14 If one were to compare these overall levels of delivery in the last 5 years to the latest calculation of LHN for Dorset (of 3,219 homes/annum), then it is clear that there will now need to be a step change in housing delivery (and a need for an associated step change in the number of planning permissions granted) to get anywhere close to meeting the requirements, let alone exceed it as a minimum requirement. Average delivery in Dorset in the past 5 years has been **1,604 homes** which is **1,615 homes short of the latest calculation of LHN.**

4. Dorset's Annual Position Statement on Five Year Housing Land Supply

4.1 Dorset Council prepared a draft Annual Position Statement (APS) dated 31 July 2024 and submitted it to the Planning Inspectorate seeking to confirm its five year housing land supply.

4.2 The APS Inspector's report was received on 26 September 2024 (**Core Document 5.1**) and confirmed that the Council's draft APS dated 31 July 2024 can demonstrate a 5-year supply of deliverable housing sites, subject to the removal of 537 dwellings.

4.3 With the removal of those 537 dwellings, paragraph 2 of the APS Inspector's Report confirms that Dorset is able to demonstrate a deliverable supply of **8,999 dwellings** against a requirement of **8,965 dwellings**. This is a housing land supply of **5.02 years** (a **surplus of only 34 dwellings** against a minimum five year housing land supply requirement).

4.4 Paragraph 3 of the APS Inspector's report confirms that the Council is now entitled to rely on the supply as shown in the draft APS and subject to the above revisions **until 31 October 2025**.

4.5 Dorset Council subsequently published an adopted Annual Position Statement (APS) on 5 Year Housing Land Supply, dated October 2024 (**Core Document 5.2**). This confirms, at Figure 8.8 on page 29 that the Council's supply is, as set out above, 5.02 years.

4.6 Paragraph 233 of the December 2024 NPPF confirms that, where a local planning authority has confirmed its housing land supply position for a year through a published Annual Position Statement that has been examined by the Planning Inspectorate against the previous version of this Framework, this position will stand until the Annual Position Statement expires, so 31 October 2025.

4.7 Based on the NPPF, I accept that the Council is technically able to demonstrate a five year housing land supply as required by paragraph 78 of the NPPF, for the purposes of footnote 8 and for the component requirement to demonstrate a five year housing land supply a paragraph 232. Whilst planning matters are addressed by Clare Spiller in her evidence (and to whom I defer in respect thereof) the five year housing land supply as now demonstrated by the APS is only one of the three criteria referenced in paragraph 232.

4.8 It is my view that the delivery of homes from the Appeal Proposal should not be afforded any less weight as a result of the technical position on housing land supply within the APS. This is because the Council's existing position on housing land supply will necessarily be short lived and there is a clear and compelling need now for more homes to be permitted in Dorset to meet up-to-date housing needs.

4.9 I set out the evidence to support my position in detail below, starting with a consideration of the Council's deliverable supply against the most recent local housing need figure.

5. The Council's Five Year Housing Land Supply – Measured Against the December 2024 NPPF and Changes to the Standard Method Local Housing Need Calculation

5.1 The APS, whilst technically demonstrating a five year supply until 31 October 2025, does not provide an up-to-date picture of the housing land supply position in Dorset, for the following reasons:

i. Firstly, the Council's APS uses a Local Housing Need figure of **1,793 dwellings per annum**. This was based on the standard method calculation at that time, and before the publication of the December 2024 NPPF. The most up-to-date local housing need figure for Dorset is now **3,219 homes**. That is an increase of **1,426 homes, per annum**. Over a five year period that equates to **7,130 homes**. Over a typical 20-year plan period, that equates an additional need of **28,520 homes**. It is clear that the requirement figure used in Council's APS calculations for the five year period 2024 to 2029 bears no resemblance to the up-to-date local housing need figure over that period.

ii. Secondly, the Council's APS applies **no buffer** to its housing land supply calculation. The December 2024 NPPF reintroduced the need to apply a 5% buffer for choice and competition in the market and retained a 20% for authorities where there has been a significant under-delivery of housing (where the HDT result is below 75%). For Dorset, the latest HDT score is 106% and so **a 5% buffer is appropriate**.

iii. Taking the above changes together, the Council's five year housing land supply position (using the examined supply within the APS) would be as set out in Table JRT5 (under the NPPF 2024 column), below. For ease of reference, I also provide the calculation Dorset uses in its October 2024 APS, against the December 2023 NPPF.

Table JRT5 – Dorset Council's Five Year Housing Land Supply – As set out in the APS and as Measured Against the December 2024 NPPF

Step		APS (2023 NPPF)	2024 NPPF
A	Housing Requirement (LHN)	1,793 homes per annum	3,219 homes per annum
B	Requirement over 5 Year (Ax5)	8,965 homes	16,095 homes
C	Requirement with a 5% Buffer (Bx1.05)	n/a	16,900 homes
D	Dorset's APS Supply	8,999 homes	8,999 homes
E	Supply	5.02 years	2.67 years
F	Shortfall	+34 homes	-7,901 homes

5.2 These figures have been agreed with Dorset Council in the Housing Delivery and Housing Land Supply Topic Papers (**Core Document 4.015, Table 4.1**).

5.3 As can be seen from Table JRT5, whilst the Council is relying on its APS (and a position of 5.02 years), it would be remiss of the Council to claim that its supply is meeting anywhere near up-to-date housing needs. It's supply, based on an up-to-date calculation would be **only 2.67 years, a shortfall of 7,901 homes**. This is a very serious and significant shortfall in the five-year housing land supply.

5.4 As paragraph 61 of the NPPF confirms, the clear objective of Government is to significantly boost the supply of homes with the overall aim to **meet** an area's identified housing need. That is not, and will not be achieved in Dorset in the next 5 years based on the Council's own claimed levels of housing land supply.

5.5 Indeed, come 1 November of this year, Dorset's housing land supply requirement over a five-year period will rise by **nearly 8,000 homes**. To get anywhere close to that requirement, it is clear that significantly more planning permissions on more sites that can deliver homes are needed.

5.6 Based on the Council's current APS deliverable supply figure of 8,999 homes, I have agreed with Dorset Council (**Core Document 4.015, paragraph 5.4**) that an approximate **88% increase in housing land supply** in the next five-year period (2025-2030) (sites capable of delivering in the region of a **further 7,901 homes**) would be required in order to meet the <u>minimum</u> 5 year requirement.

5.7 In my view, that step change in housing delivery will not be met without urgent action being taken to address these shortfalls in supply. Without such action, significant shortfalls in housing land supply are expected to persist for many years. I consider that proposition further in Section 6, below.

6. How Long Shortfalls in Housing Land Supply Will Persist in Dorset

Introduction

6.1 As set out in Section 5, and notwithstanding its APS, Dorset Council is not able to demonstrate a sufficient housing land supply against an up-to-date LHN figure.

6.2 As shown in Table JRT5 above, the Council's current claimed deliverable supply falls nearly, 8,000 homes short when using an up-to-date LHN figure of 3,219 homes per annum to calculate housing land supply.

6.3 In addition, it is clear from my assessment that this shortfall in housing land supply will persist for many years unless there is a significant step change in housing delivery, which must start from the granting of many more planning permissions for more homes. I set out the evidence for this below.

Dorset's Housing Land Supply in Future Five Year Supply Monitoring Periods

6.4 As confirmed in Section 5 of this Statement, based upon the Council's current APS deliverable supply figure of 8,999 homes, I have agreed with the Council that an approximate **88% increase in housing land supply** in the next five year period (2025-2030) (sites capable of delivering in the region of a **further 7,901 homes**) will be required in order to meet the minimum 5 year requirement.

6.5 However, when compared to current expected levels of delivery in the period 2025 to 2030, the Council will fall considerably short of meeting this requirement.

6.6 As well as setting out expected delivery for the 5 year period 2024-2029, the Council's APS includes a projected supply figure in the monitoring year 2029/2030 from the following sources of supply:

- Major sites with planning permission – 268 homes
- Sites with outline planning permission – 140 homes
- Sites allocated within local plans – 174 homes
- Sites allocated in Neighbourhood Plans- 125 homes
- Other specific Large Sites- 38 homes

6.7 The total supply from the above sources of supply equates to **745 homes**. If one then adds a further years' worth of the Council's potential supply from small sites and small site windfalls (**400 homes**) this gives a total predicted supply in 2029/30 of **1,145 homes**. Taking this figure and adding that to the APS supply for years 2 to 5 in the current 5-year period, that equates to a predicted supply (based on the Council's own figures) of **8,461 homes in the period 2025 to 2030**.

6.8 Table JRT6 below, sets out what the Council's five year supply in that 2025 to 2030 period would be using the above potential deliverable supply figure of 8,461 homes.

Table JRT6 – Dorset Council's Estimated Five Year Housing Land Supply – Against the December 2024 NPPF for 2025/26-2029/30 based on AMS trajectory tables		
Step		
A	Housing Requirement (LHN)	3,219 homes per annum
B	Requirement over 5 Year (Ax5)	16,095 homes
C	Requirement with a 5% Buffer (Bx1.05)	16,900 homes
D	Dorset's APS Supply 2025/26-2029/30	8,461 homes
E	Supply	2.50 years
F	Shortfall	-8,439 homes

6.9 The above demonstrates that the current supply figures included in the APS for the period 2025 to 2030 would result in a reduced housing land supply position in that period, compared to the 2024-2029 position shown in Table JRT5. The supply would be only **2.5 years, a shortfall of 8,439 homes**.

6.10 Whilst I appreciate that the Council's supply is based on sites that were considered at the time of the production of the Council's 2024 APS (with the potential that further permissions may have come forward on sites not considered in the APS), equally some of the sites shown as having some deliverable supply in year 6 (2029/30) may not meet the definition of deliverable in the NPPF at a 1st April 2025 base date.

6.11 To sensitivity test the above findings, I have also considered the Council's supply position if it were able to increase its deliverable supply in the 5-year period 2025 to 2030 by 20%. The result is set out in Table JRT7, below.

Table JRT7 – Dorset Council's Estimated Five Year Housing Land Supply – Against the December 2024 NPPF for 2025/26-2029/30 based on AMS trajectory tables + 20%		
Step		
A	Housing Requirement (LHN)	3,219 homes per annum
B	Requirement over 5 Year (Ax5)	16,095 homes
C	Requirement with a 5% Buffer (Bx1.05)	16,900 homes
D	Dorset's APS Supply 2025/26-2029/30 + 15%	10,153 homes
E	Supply	3.00 years
F	Shortfall	-6,747 homes

6.12 This demonstrates that even if the Council were to increase its supply in the 2025 to 2030 five year period by 20% (which is a step change in itself), the supply would rise to only 3 years, which is still a shortfall of 6,747 homes. An increase in supply **well beyond 20% is, therefore, required**.

6.13 This leads me onto consider what percentage increase in supply would be required in the 2025 to 2030 five-year period in order to meet the requirement. Based on the shortfall in supply in Table JRT6 above, Dorset Council would need **an additional 8,439 homes** in order to just meet the minimum 5-year supply requirements. That would require a **99.7% increase** in the current APS supply for the 2025 to 2030 period, i.e. a requirement to effectively double the sites the Council has in the pipeline.

6.14 A further measure of the Council's inability to demonstrate a five year supply in the coming years, is a comparison of the expected delivery that was set out in the Council's Local Plan in 2019.

6.15 The following Table (provided as Figure JRF1) from the draft Local plan consultation in 2021 (please see page 50 or **Core Document 7.2002** (Figure 2.7)) sets out a total supply of 39,285 homes from the then base date of 1st April 2019 to the end of then expected plan period in 2038.

Housing Requirement	30,481
	Sources of Housing Land Supply
Extant planning permissions at 01 April 2019	12,050
Supply from unconsented allocations in the Dorset Council Local Plan (figures base date to April 2019)	16,570
Small sites (10 to 30 dwellings) + major unconsented sites	3,615
Minor sites (9 dwellings or fewer) Windfall Allowance	6,193
Sites identified in neighbourhood plans (figures base date April 2019)	737
Unconsented rural exception sites with funding (figures base date April 2019)	120
Total Supply	**39,285**

Figure JRF1 – Housing Land Supply Sources from the draft Local Plan (2019)

6.16 Using a total supply if **39,285 homes in the period 2019 to 2038**, that equates to an annal average delivery of **2,068 homes**. That average delivery figure is, on its own, a higher level of delivery than has occurred in Dorset in the last 5 years (see Table JRT4).

6.17 Using 2,068 homes per annum over a 5-year period, that would result in a theoretical housing land supply of **10,340 homes**. Using that figure, the resultant 5-year supply position would be as follows:

Table JRT8 – Dorset Council's Estimated Five Year Housing Land Supply – Against the December 2024 NPPF for 2025/26-2029/30 based on Dorset's Regulation 19 consultation Plan estimated supply (averaged)		
Step		
A	Housing Requirement (LHN)	3,219 homes per annum
B	Requirement over 5 Year (Ax5)	16,095 homes
C	Requirement with a 5% Buffer (Bx1.05)	16,900 homes
D	Dorset's Reg 19 consultation plan	10,340 homes

	supply for 5 years (average)	
E	Supply	3.06 years
F	Shortfall	-6,560 homes

6.18 As can be seen from Table JRT8, when using the average annual housing delivery from the draft Dorset Local Plan, the Council's supply would be significantly short of Dorset's five-year requirement against an up-to-date LHN.

6.19 It is clear from the evidence above that the Council needs a significant increase in planning permissions for new homes, beyond previously emerging draft allocations, in order get anywhere close to meeting its five-year supply requirements and its overall LHN in any future plan period as a whole.

6.20 Compared to the Council's total previous draft Local Plan supply in the 19-year period (2019-2038, see Figure JRF1) of 39,285 homes, the requirement over a 19 year period using the latest LHN of 3,219 homes/annum equates to a requirement of **61,161 homes**. As such, **an increase in supply of 21,876 homes** would be required over that same period.

6.21 Whether one uses the Council's current 2024 to 2029 housing land supply, its current predicted levels in the period 2025 to 2030, or its average expected delivery from the previous draft Local Plan, none of these supply figures comes anywhere close to meeting the requirement against the up-to-date LHN. Without a step change in housing delivery shortfalls in housing land supply can be expected to persist for many years.

6.22 The Council cannot rely solely on its emerging Local Plan to address these shortfalls in supply, or to provide the step change in housing delivery that is required, now. Whilst the latest Local Development Scheme (March 2025 – **Core Document 7.1**) sets out an updated timetable for the plan's production (with an intended submission plan in December 2026) it is not clear when one can actual expect the Plan to be adopted and, furthermore, there has been a clear record of plan production delay in the authority to date, with the potential for further delays in the future plan production and adoption. Steps to boost housing supply and delivery need to be taken now, in advance of the Plan's production.

7. Reliance on Large Site Windfalls and Geen Field Sites

7.1 I have also considered how reliant the Council is upon the delivery of homes on greenfield sites as part of its current housing land supply and upon sites that have come forward but were not allocated for development (i.e. windfall sites). This gives an indication of the type of sites that will be required, as part of the step change in housing delivery needed to meet LHN.

7.2 **<u>Appendix JR1</u>** includes a consideration of all large sites within the Council's supply and identifies whether these are a greenfield or brownfield sites and whether the site was allocated in the Development Plan. Summary tables of the analysis are provided below.

Table JRT9- Analysis of Sites in the Council's Housing Land Supply – Greenfield and Brownfield		
	Quantum	Percentage of Supply
Quantum of Homes in the Council's supply on Greenfield Sites	5,702 homes	81.5%
Quantum of Homes in the Council's supply on Brownfield Sites	1,209294 homes	18.5%

7.3 As can be seen from Table JRT9, circa 80% of the Council's current housing land supply comprises greenfield sites. As can be seen from Table JRT9, over 80% of the Council's current housing land supply comprises greenfield sites. Whilst there is some supply from brownfield land within the area, the vast majority of new homes (in the current supply period) are expected to deliver on greenfield sites.

7.4 Table JRT10 then considers what component of the large sites in the Council's supply is made up from unallocated (windfall) sites. This excludes the Council's specific small site windfall component.

Table JRT10 – Supply from Unallocated (Windfall) Sites		
	Quantum	Percentage of Supply
Quantum of Homes in the Council's supply on unallocated Sites	2,2941,733 homes	24.8%
Quantum of Homes in the Council's supply on allocated Sites	4,7025,263 homes	75.2%

7.5 As can be seen from Table JRT10, around a third of homes within the large sites component of the current supply are from sites that have come forward outside of the development plan process. This figure also excludes any windfalls on small sites, so can be considered an underestimate of the Council's total reliance on windfall permissions.

7.6 Overall, it is clear from my analysis that both unallocated (windfall) and greenfield sites have been a vital component of the Council's supply and will continue to need to be a vital component of supply going forwards, particularly given the significant future shortfalls in housing land supply that I have identified.

8. Summary and Conclusions

8.1 My evidence in this Statement addresses both housing delivery and housing land supply in Dorset as a whole, and within the former North Dorset authority within which the Appeal Site is located.

8.2 This Statement also follows the agreement with Dorset Council of the Topic Paper on Housing Delivery and Housing Land Supply, which was submitted to the Planning Inspectorate on 28 February 2025 (and provided as **Core Document 4.015**).

Housing Delivery in North Dorset

8.3 My evidence demonstrates that, from the beginning of the North Dorset Local Plan period in 2011 up to 2021 (which is when the housing requirement in the North Dorset Local Plan was used to monitor housing delivery and supply), the Council had a record of under-delivery in 9 years of that previous 10 year period.

8.4 As of 1st April 2021, the cumulative under-delivery against the Local Plan housing requirement (since the beginning of the plan period in 2011) stood at 852 homes, nearly 3 years' worth of the Local Plan annual requirement of 285 homes.

8.5 In the subsequent period 2021 to 2024, the Council's delivery record has improved to more acceptable levels. When monitored against LHN in that period (which was the housing requirement figure used by Dorset Council to calculate the five-year housing land supply requirement in North Dorset) there was 1 year of under-delivery in 2021/22 and 2 years of over-delivery in 2022/23 and 2023/24.

8.6 However, if one were to compare the latest LHN figure for North Dorset of 571 dwellings per annum to delivery since 2011, the Council has never achieved this scale of delivery. Indeed, the average delivery in North Dorset since 2011 has been only 253 dwellings/annum, less than half of the current LHN.

Housing Delivery Across Dorset as a Whole

8.7 My evidence shows that Dorset Council has not met the LHN housing requirement in 4 of the past 5 years (2019/20 to 2023/24), with the level of under-delivery at its highest in the last monitoring year in 2024/25 (-424 homes).

8.8 Average delivery in Dorset in the past 5 years has been 1,604 homes. That average delivery is 1,615 homes short of the latest calculation of LHN for Dorset (of 3,219 homes/annum). On that basis, there will now need to be a step change in housing delivery (and a need for an associated step change in the number of planning permissions granted) to get anywhere close to meeting its requirements, let alone exceed it as a minimum requirement.

The Council's Annual Position Statement on Five Year Housing Land Supply

8.9 Dorset Council has an adopted Annual Position Statement (APS) on 5 Year Housing Land Supply, dated October 2024 (**Core Document 5.2**). This confirms, at Figure 8.8 on page 29, that the Council's supply is 5.02 years.

8.10 Paragraph 233 of the December 2024 NPPF confirms that, where a local planning authority has confirmed its housing land supply position for a year through a published Annual Position Statement that has been examined by the Planning Inspectorate against the previous version of this Framework, this position will stand until the Annual Position Statement expires, so 31 October 2025.

8.11 Based on the NPPF, I accept that the Council is technically able to demonstrate a five-year housing land supply as required by paragraph 78 of the NPPF, for the purposes of footnote 8 and for the component requirement to demonstrate a five-year housing land supply at paragraph 232. However, the five-year housing land supply as now demonstrated by the APS is only one of the three criteria referenced in paragraph 232.

8.12 It is my view that the weight to be afforded to the delivery of homes from the Appeal Proposal should not be afforded any less weight as a result of the technical position on housing land supply because the Council's position on housing land supply will be short lived and there is a clear and compelling need now for more homes to be permitted in Dorset to meet up-to-date housing needs. It is my view that the weight to be afforded to the delivery of homes from the Appeal Proposal should not be reduced as a result of the technical position on housing land supply because the Council's position on housing land supply will be short lived and there is a clear and compelling need now for more homes to be permitted in Dorset to meet up-to-date housing needs.

8.13 My evidence shows that the Council's APS does not provide an up-to-date picture of the housing land supply position in Dorset. Firstly, the Council's APS uses a Local Housing Need figure of 1,793 dwellings per annum. This was based on the standard method calculation at that time and before the publication of the December 2024 NPPF. The most up-to-date local housing need figure for Dorset is now 3,219 homes. Secondly, the Council's APS applies no buffer to its housing land supply calculation. The December 2024 NPPF reintroduced the need to apply a 5% buffer for choice and competition in the market and retained a 20% buffer for authorities where there has been a significant under-delivery of housing (where the HDT result is below 75%). For Dorset, the latest HDT score is 106% and so a 5% buffer is appropriate. Taking those changes into account, the housing land supply for Dorset, based on an up-to-date calculation would be only **2.67 years, a shortfall of 7,901 homes**. This will be the Council's supply position come 1st November 2025.

8.14 On that basis, it would be remiss of the Council to claim that its supply is meeting anywhere near up-to-date housing needs.

How Long Will Shortfalls in Housing Land Supply Persists

8.15 Based on the Council's current APS deliverable supply figure of 8,999 homes, I have agreed with Dorset Council (**Core Document 4.015**, paragraph 5.4) that an approximate 88% increase in housing land supply in the next five-year period (2025-2030) (sites capable of delivering in the region of a further 7,901 homes) would be required in order to meet the minimum 5 year requirement. Based on the Council's current APS deliverable supply figure of 8,999 homes, I have agreed with Dorset Council (**Core Document 4.015**, paragraph 5.4) that an approximate 88% increase in housing land supply in the next five-year period (2025-2030) (sites capable of delivering in the region of a further 7,901 homes) would be required in order to meet the minimum 5 year requirement, come 1st November 2025.

8.16 Looking further ahead to the current supply figures included in the APS for the period 2025 to 2030, my evidence shows that this would result in a reduced housing land supply position in that period, compared to the 2024-2029 position shown in Table JRT5. The supply would stand that only 2.5 years, a shortfall of 8,439 homes.

8.17 Based on the shortfalls in current supply in that 2025 to 2030 period, an additional 8,439 homes would be required to just meet the minimum 5-year supply requirements. That would require a 99.7% increase in the current APS identified supply for the 2025 to 2030 period, i.e. a requirement to effectively double the sites the Council presently has in the pipeline.

8.18 My evidence also considers a further measure of the Council's inability to demonstrate a five-year supply in the coming years. That is a comparison of LHN to the expected delivery that was set out in the Council's Local Plan in 2021. That draft plan set out a total supply of 39,285 homes from the then base date of 1st April 2019 to the end of then expected plan period in 2038. That total supply equates to an annal average delivery of 2,068 homes. Overall, that level of delivery would still only result in a supply of 3.06 years, a shortfall of 6,560 homes.

8.19 From my overall analysis whether one uses the Council's current 2024 to 2029 housing land supply, it's current predicted levels in the period 2025 to 2030, or its average expected delivery from the previous draft Local Plan, none of these supply figures comes anywhere close to meeting the requirement against the up-to-date LHN. Without a step change in housing delivery, shortfalls in housing land supply can be expected to persist for many years.

8.20 It is clear that urgent action must be taken to address these shortfalls in supply. The only way to address these shortfalls is to grant planning permissions on more sites that can deliver homes.

The Council's Reliance of Greenfield and Windfall Sites

8.21 My evidence further demonstrates that approximately 80% of the Council's current housing land supply (on large sites) is made up of greenfield sites. My evidence further demonstrates that over 80% of the Council's current housing land supply (on large sites) is made up of greenfield sites. Furthermore, approximately a third of the Council's large site supply is made up from windfall sites.

8.22 These greenfield and windfall components of the Council's supply will continue be vital components of supply going forwards, particularly given the significant future shortfalls in housing land supply that I have identified.

Overall Conclusions

8.23 Whilst the Council is currently able to rely on its APS until 31st October 2025, the Council's supply will then reduce to only 2.67 years, a shortfall of 7,901 homes. This is a very serious and significant shortfall in five-year housing land supply.

8.24 Those shortfalls in supply will persist for many years and a significant step change in housing delivery is required in Dorset to address the up-to-date LHN. The Council's Local Plan is many years away and the Council cannot rely on that plan to address its immediate shortfalls in supply, and the step change in housing delivery that is required now.

8.25 That step change must start from the granting of many more planning permissions for more homes and that will require many more planning permissions on greenfield windfall sites.

Appendix 1: JR1 Review of Site Allocation Status and Greenfield/Brownfield status

Turley

Appendix JR1 Review of Site Allocation Status and Greenfield/Brownfield status							
Settlement / Parish	**Application number**	**Site location**	**5 year supply total**	**Allocated in the development Plan**	**Not Allocated in the development Plan**	**Greenfield Site**	**Brownfield Site**
Alderholt	3/19/2077/RM	Land north of Ringwood Road, Alderholt, SP6 3HZ	45		45	45	
Alderholt	3/11/0558/REM	Alderholt Surplus Stores, Daggons Road, Alderholt, Sp6 3TB	89		89	89	
Beaminster	P/RES/2021/01944	BEAM1: Land north of Broadwindsor Rd	100	100		100	
Blandford St Mary	2/2019/1627/REM	St Mary's Hill, BSM	76	76		76	
Bourton	2/2016/0610/REM	Bourton Mill, Factory Hill, Bourton	13		13		13
Bridport	P/RES/2021/04848	BRID1: Vearse Farm (Hallam Land)	400	400		400	
Cerne Abbas CP	P/FUL/2021/03000	Cerne Abbas Care Centre Cerne Abbas Dorchester DT2 7AL	11.11		11		11
Charlton Marshall	P/RES/2021/02870	South of Newlands Manor House, Charlton Marshall	35		35	35	
Charminster	WD/D/19/003097	Land West of Charminster Farm, Between Wanchard Lane and A37, Charminster	15		15	15	
Chickerell	WD/D/18/001922	CHIC2: Chickerell Urban Extension North	61	61		61	
Child Okeford	P/RES/2022/03207	Land off Haywards Lane (West of Allen Close)	26		26	26	
Corfe Mullen	3/18/1594/CLP	Charris Caravan and Camping Park, Candys Lane	6		6	6	
Corfe Mullen	3/20/0667/RM	Land to The North Of Wimborne Road (New neighbourhood Lockyers school Corfe mullen) - Phase 2	17	17		17	
Crossways	WD/D/17/002760	Adj. Oaklands Park, Warmwell Road	12		12	12	
Crossways	P/RES/2021/01645	West of Frome Valley Road	140	140		140	
Dorchester	P/PACD/2022/0640 4	Princes House, , Princes Street, , Dorchester, , DT1 1TP	26		26		26
Dorchester	WD/D/18/002594	PHASE 3 BREWERY DEVELOPMENT SITE, WEYMOUTH AVENUE, DORCHESTER	133	133			133
Dorchester	WD/D/17/001480	CROWN GATE, SECTORS 3.46/47/48, NORTHERN QUADRANT, POUNDBURY	76	76		76	
Dorchester	1/D/12/000082	Phase 3 Peverell Avenue East	2	2		2	
Dorchester	WD/D/20/002387	32 PRINCE OF WALES ROAD, DORCHESTER, DT1 1PW	16		16		16
Dorchester	WD/D/19/000760	TOP O TOWN HOUSE, BRIDPORT ROAD, DORCHESTER, DT1 1XT	9		9		9
Dorchester	WD/D/16/001590	North Quadrant Phases 3 & 4	80	80		80	
Dorchester	WD/D/20/002764	North West Quadrant Phases 3 & 4	205	205		205	
Ferndown/ West Parley	3/06/0395/REM	The Warren (Phases E)	25	25		25	
Ferndown/ West Parley	P/RES/2022/03505	Land East of New Road, West Parley (FWP6) - Phase 1	238	238		238	

Ferndown/ West Parley	3/17/3609/OUT	Land East of New Road, West Parley (FWP6) (remaining Phases on allocation site)	148	148		148	
Ferndown/ West Parley	3/97/0742/REM	The Warren (Phases B,C)	14	14		14	
Ferndown/ West Parley	3/16/1306/FUL	1 Carroll Avenue & 430 Ringwood Road, Ferndown	15		15		15
Gillingham	2/2018/1437/FUL	Extra care facility, St Martins	37		37		37
Gillingham	P/FUL/2022/02964	J H Rose And Sons Station Road Gillingham SP8 4PZ	17		17		17
Gillingham	P/RES/2022/00263	Lodden Lakes - Phase 2	115	115		115	
Gillingham	P/RES/2023/02376	Ham Farm - Phase 1a	34	34		34	
Gillingham	P/RES/2022/06180	Common Mead Lane	80		80	80	
Holt, Knowlton and Sixpenny	3/18/1746/CLP	Land to south side of Horton Road, Three legged Cross	24		24		24
Langton Matravers	6/2019/0604	The Old Malthouse, High Street, Langton Matravers BH19 3HB	19		19		19
Marnhull	P/RES/2022/05524	Land North Of Burton Street, Marnhull	61		61	61	
Maiden Newton	WD/D/19/002190	Land to The East of 26-44 Cattistock Road, Maiden Newton	14		14	14	
Milborne St Andrew	2/2009/0206/PLNG	Goulds Farm, Little England, MILBORNE ST ANDREW	5		5		5
Okeford Fitzpaine	P/FUL/2021/01931	Buildings And Land At, Pleydells Farm, Lower Street	27		27		27
Okeford Fitzpaine	P/RES/2021/05461	Shillingstone Poultry Farm	39		39		39
Portland	P/RES/2023/02024	Royal Manor School (phase 2 - all affordable scheme)	41		41		41
Portland	WP/17/00323/FUL	Underhill Community Junior School, Killicks Hill DT5 1JW	2		2		2
Portland	08/00513/FULMAJ and 10/00779/FUL	Perryfield Works, Pennsylvannia Road, Easton	10		10		10
Portland	WP/19/00970/RES	Southwell School	48		48		48
Shaftesbury	P/FUL/2021/01338	A T S Euromaster site, New Road	24		24		24
Shaftesbury	P/FUL/2021/01429	Adj Wincombe Business Park	126		126	126	
Shaftesbury	2/2018/1418/REM	Land W of Littledown	5	5		5	
Shaftesbury	P/RES/2021/01690	Land at Higher Blandford Road	18		18	18	
St Leonards and St Ives	3/19/1124/CLP	Land at Lone Pines Close, Matchams Lane, Hurn, Christchurch, Dorset, BH23 6LP	20		20		20
St Leonards and St Ives	3/21/1115/FUL	184 Ringwood Road, St Leonards and St Ives, BH24 2NR	14		14		14
Stalbridge	2/2019/0162/REM	Land N of Lower Road, Stalbridge	5		5	5	
Stalbridge	P/RES/2022/06181	Land South of the Paddocks, Lower Road	114		114	114	
Sturminster Newton	P/RES/2021/02896	Site 3: Northfields / Honeymead Field	68	68		68	
Sturminster Newton	2/2019/1801/FUL	Site 4: Elm Close / Bull Ground Lane	98		98	98	
Swanage	6/2020/0432	Former St Marys School, Manor Road, Swanage, BH19 2BH	30		30		30
Swanage	6/2021/0314	Purbeck Centre (former Grammar School), Northbrook Road, Swanage, BH19 1QE	35		35		35
Verwood	3/19/0019/RM	Land south of Howe lane	29		29	29	
Verwood	3/19/2512/RM	Phase 2, Land South of Edmondsham Rd	14	14		14	
Verwood	P/FUL/2022/03125	Phase 3, Land South of Edmondsham Rd	38	38		38	
Weymouth	WP/20/00807/FUL	SEC DEPOT, WESTWEY ROAD, WEYMOUTH, DT4 8SU	23	23			23

Weymouth	P/FUL/2021/01697	South of Louviers Road	65		65	65	
Weymouth	P/FUL/2022/03703	87 The Esplanade (site fronting Gloucester Mews), , Weymouth, , Dorset, , DT4 7AT	23		23		23
Weymouth	WP/19/01016/FUL	ST NICHOLAS CHURCH, BUXTON ROAD, WEYMOUTH, DT4 9PJ	18		18		18
Weymouth	WP/19/00476/FUL	8 to 10 Dorchester Road	31		31		31
Weymouth	WP/18/00914/FUL	Marchesi House Poplar Close, Southill	31		31		31
Weymouth	WP/17/00734/FUL	104E St Mary Street, Weymouth, DT4 8NY	14	14			14
Weymouth	WP/16/00852/RES	Brewery Reach, Car Park, Newtons Road DT4 8UP	18		18		18
Weymouth	WP/19/00370/FUL	MAIDEN STREET METHODIST CHURCH, MAIDEN STREET, WEYMOUTH, DT4 8BB	25		25		25
Weymouth	WP/18/00388/RES	Ferrybridge Inn Portland Road	29		29		29
Weymouth	WP/19/00635/RES	Curtis Fields (Phase 4)	39	39		39	
Weymouth	WP/19/00693/RES	Curtis Fields Phases 2A, 3A, 3B	214	214		214	
Weymouth	WP/19/01025/RES	WEY12: Land at Wey Valley	200	200		200	

Weymouth	WP/18/00298/FUL, P/FUL/2023/04876	Brewers Quay, Hope Square DT4 8TR	52	52			52
Weymouth	P/FUL/2023/03241	Holly Court, Waverley Road, Weymouth, Dorset, DT3 5ED	2		2		2
Weymouth	P/RES/2021/04983	LITT1: Littlemoor Urban Extension	364	364		364	
Wimborne / Colehill	3/19/2437/RM	Land to East and West of Cranborne Road(Cranborne Rd New Neighbourhood) (WMC7)	156	156		156	
Wimborne / Colehill	3/16/0002/FUL	Land Adjacent To Julians Road, Cowgrove Road And The River Stour (Cuthbury allottments New Neighbourhood) (WMC5)	72	72		72	
Wimborne / Colehill	3/19/2449/FUL	Land South of Leigh Road (S of Leigh Rd new neighbourhood) (WMC8) - Care home (Appeal)	35.55556	36		36	
Wimborne / Colehill	3/21/1556/FUL	Wimborne Market, Station Terrace, Wimborne	108		108		108
Wimborne / Colehill	3/17/0848/FUL	Land South of Leigh Road (S of Leigh Rd new neighbourhood) (WMC8)	44	44		44	
Wimborne / Colehill	3/18/3305/FUL	Land South of Leigh Road (S of Leigh Rd new neighbourhood) (WMC8)	174	174		174	
Wimborne / Colehill	p/ful/2022/07744	14 East Street, 23 and 23A Eastbrook Row, East Street, Wimborne, BH21 1DS	11		11		11
Wimborne / Colehill	3/19/1927/FUL	20-23 East Street	15		15		15
Beaminster	WD/D/19/000613	LAND TO NORTH AND WEST OF, COCKROAD LANE, BEAMINSTER	58	58		58	
Blandford St Mary	2/2017/1919/OUT	Lower Bryanston Farm, BSM	75	75		75	
Gillingham	P/RES/2022/04960	Ham Farm - Phase 1b	108	108		108	
Gillingham	P/RES/2022/07898	Ham Farm - Phase 2	280	280		280	
Gillingham	P/RES/2023/05868	Ham Farm - Phase 3	68	68		68	
Milborne St. Andrew	2/2019/0403/OUT	Land south of Milborne Business Centre, Blandford Hill, Milborne St Andrew	58	58		58	
Shaftesbury	2/2018/1773/OUT	Land south of A30	45		45	45	
Stalbridge	2/2019/1799/OUT	Land S of Station Road	40		40	40	
Sturminster Newton	2/2017/1912/OUT	Land At The Bull, Common Lane	17		17	17	
Bridport	1/D/11/002012	BRID5: St Michaels Trading Estate	9	9			9
Chickerell	WD/D/20/002569	CHIC2: Chickerell Urban Extension East	120	120		120	
Crossways	WD/D/16/000378	Land at Crossways	99	99		99	
Dorchester	P/FUL/2022/05673	Maltings and Maltings Mews, Brewery Square, Dorchester	76	76			76
Ferndown		Land at Green Worlds	24	24			24
Lytchett Matravers	P/FUL/2022/01095	Blaney's Corner, Lytchett Matravers	25	25		25	
Lytchett Matravers		East of Flowers Drove, Lytchett Matravers	28	28		28	

Lytchett Matravers	6/2021/0282	East of Wareham Road, Lytchett Matravers	95	95		95	
Upton	6/2019/0717	Land at Policemans lane, Upton (phase 2)	92	92		92	
Weymouth		Council Offices, North Quay	75	75			75
Wool	6/2021/0045	North of railway line, Wool	35	35		35	
Alton Pancras	WD/D/20/003302	Austral Farm	9	9			9
Bere Regis		Back Lane, Bere Regis	51	51		51	
Bere Regis		North Street, Bere Regis	15	15		15	
Bere Regis		Former School Site, Bere Regis	21	21			21
Bere Regis	6/2020/0013	White Lovington, Bere Regis	17	17		17	
Blandford	P/OUT/2020/00026	Land north and east of the Blandford Bypass	142	142		142	
Cerne Abbas	P/FUL/2023/02553	Swanhills, Cerne Abbas	18	18		18	
Fontmell Magna	P/OUT/2023/02893	Blandfords Farm Barn (site 22)	9	9		9	
Sturminster Newton	P/FUL/2023/06986	Site 1: North of the Livestock Market	43	43		43	
Wareham	P/OUT/2022/01345	Westminster Road Industrial Estate (H5)	9	9			9
Wareham	P/FUL/2022/01906	Former Gas Works Site (H7) and autopoint	9	9		9	
Arne	P/FUL/2022/07955	West Lane, Land at Steppingstones Fields, Stoborough	9	9		9	
Arne	6/2019/0639	Land North of West Lane, Stoborough	15	15		15	
Blandford St Mary	P/FUL/2024/00233	Brewery site (Lot 2), Blandford St Mary	41	41			41
Broadmayne	P/OUT/2021/05309		80	80		80	
Charminster	WD/D/20/003259	Charminster Farm Phase 4 etc.	30	30		30	
Dorchester	WD/D/20/001242	Tennis Courts, Trinity St Carpark	15	15			15
Holt, Knowlton and Sixpenny	P/FUL/2021/05768	Land at Back Lane (site 1)	20	20		20	
Wool	6/2021/0331	Pug Pit, Wool	8	8		8	
Total			**6996**	**5263**	**1733**	**5702**	**1294**

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