

Appendix D – Retail Impact Assessment Review

LPA Ref: PL/21/1309/FA
March 2022 | PR | P21-3819



PLANNING APPLICATION FOR PROPOSAL BY ALDI STORES LTD FOR THE DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF A CLASS E FOODSTORE

RETAIL IMPACT ASSESSMENT REVIEW

**LAND AT FORMER LOOKERS JANGUAR SITE,
LONDON ROAD WEST, AMERSHAM**

ON BEHALF OF BUCKINGHAMSHIRE COUNCIL



Pegasus Group

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DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

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1.0 Introduction

- 1.1 Buckinghamshire Council (BC) instructed Pegasus Group to undertake a review of the Planning and Retail Statement (PRS) by Planning Potential on behalf of Aldi Stores Ltd for their proposed development at the former Jaguar site, London Road West, Amersham. This report provides the details of that review and our recommendations to BC. For the avoidance of any doubt, this report only considers the retail aspect of the proposal.

2.0 Background

- 2.1 Planning Potential (on behalf of Aldi Stores Ltd) submitted a planning application to BC for:

"Demolition of existing buildings and erection of a Class E foodstore with servicing, access car parking and landscaping."

Details

- 2.2 The application was registered on 12 May 2021 and has the reference PL/21/1309/FA.
- 2.3 The foodstore element of the scheme is summarised as follows:
- 1,998 sqm gross external area (GIA is not provided)
 - 1,315 sqm net sales area
 - A food:non-food split of 80:20
- 2.4 The applicant has submitted a Planning and Retail Statement (PRS to support the proposal. It is set out that the site is in an edge-of-centre location in that it is identified at para 6.1 of the PRS as being located around 200m from Old Amersham Local Centre. We do not dispute this.
- 2.5 As it is an edge of centre site the PRS covers the sequential approach to

development. The PRS also considers the impact of the proposal. Both elements are considered further in this assessment review.

- 2.6 This review has also considered the objection raised by Martin Robeson Planning (MRP) on behalf of Tesco Stores Ltd.

3.0 Planning policy position

- 3.1 The National Planning Policy Framework (2019) advises at paragraph 85 that:

"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation."

- 3.2 It goes on to set out the matters that planning policies should cover.

- 3.3 It confirms at paragraph 86 that LPAs *'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.'* That is the case with the retail element of this application and the Applicant has included a sequential assessment within the supporting PRS.

- 3.4 The sequential approach is confirmed as being town centre locations first, then 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.'*

- 3.5 It confirms at paragraph 87 that 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.'

- 3.6 Paragraph 89 sets the threshold for the need for an impact assessment as 2,500 sqm of gross floorspace unless there is a locally set threshold.
- 3.7 Discussions with the Policy Team at BC have confirmed that the validation requirement was consulted upon in March 2020 and this sets a local sequential test threshold, despite the absence of a specific threshold being set in the adopted development plan for the former Chiltern (and South Bucks) area(s).
- 3.8 The paragraph goes on to explain that the assessment should cover impact on existing, committed or planned investment in a centre or centres in the catchment area. It also requires it to cover the impact of the proposal on the vitality and viability of town centres, '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)'.
- 3.9 It confirms at paragraph 90 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 89, it should be refused'.
- 3.10 The Chiltern District Local Plan was adopted in 1997 and the Core Strategy adopted in November 2011. The Council was preparing a replacement Local Plan but we note above it has been withdrawn. For the purposes of this review, we have taken into account the policies of the Framework and the guidance for those policies given the age of the Plan.
- 3.11 For the purposes of this exercise, it is necessary to note that the application site is in an edge of centre location and is not identified for retail use.

4.0 Sequential Test

- 4.1 It is understood that pre-applications were undertaken between the Applicant

and BC, but Pegasus Group were not included within any of those discussions. No retail scoping was undertaken with Pegasus Group ahead of the submission of the application, but the PRS confirms that various sequential sites were agreed with Officers to be considered within Amersham on the Hill, Amersham Old Town and Chesham town centres.

- 4.2 In assessing this element, it is only when the retail impact section of the PRS is considered, does the proposed store's catchment begin to be revealed (para 7.19) and this is identified to be Zone 2 of the Council's Retail and Leisure Study Update (2019). It is understood that this catchment area is carried through from the 2017 Retail Study. However the catchment is defined, it appears to be a reasonable catchment for the store proposed.
- 4.3 It is confirmed that sites identified within the Retail and Leisure Study Update (2019) and site visits to the relevant centres were undertaken to support the sequential approach to development.
- 4.4 Aligned with this, the parameters are said to be set out in paragraphs 6.5 onwards and various relevant cases are then set out to provide additional principles which have been established (6.9 onwards). Despite this, the PRS does not then set out the actual parameters which have been applied to the assessment.
- 4.5 There are some sites which are clearly not sequentially preferable, as set out in the assessment, and these include:
- Old Post Office – too small to accommodate the development proposed
 - Star Yard Car park – too large and also owned by the Council who have not confirmed that the site is available
 - NCP Car Park – too small to accommodate the development proposed
- 4.6 Nevertheless, Pegasus Group provide further comments on the other potential

sites identified within the assessment below:

East Building Supplies

- 4.7 It appears that this site would appear to be broadly the size required for the proposal at approximately 0.7ha. It is noted that it appears to be a relatively recent acquisition site for Travis Perkins, given that Google Streetview indicates that they were not in occupation in 2017.
- 4.8 The site was first been identified in 2007 joint Retail Study then revisited in more recent Studies. Given that it has been a potential retail location for around 15 years and has not come forward for such use, some questions need to be asked about the potential of this site for a retail development and its availability.
- 4.9 In this respect, Pegasus Group consider it to be a backland site which significantly reduces the attractiveness of the site for a convenience retail development.
- 4.10 There is acknowledgement around the acquisition of additional buildings/sites to create a more active frontage and this is included within the RLS. An update as to whether any negotiations around these matters and the potential impact on the timescales for this site to potentially come available and be assembled would have been useful.
- 4.11 Overall, it would have strengthened the Applicant's position if there was tangible evidence to support the position that the site is not available. Nevertheless; it is Pegasus Group's overall view that the East Building Supplies site is not a sequentially preferable site to accommodate the development proposed.

Sycamore Road/Woodside Road, Amersham on the Hill

- 4.12 It appears that this site would appear to be broadly the size required for the

proposal at around 0.7ha. It is noted that there are a reasonable number of separate units, but they all appear to be within the same ownership.

- 4.13 Similar to the above site, it appears to have been first identified in the 2007 Retail Study and has still not come forwards for town centre development.
- 4.14 Having said that, the largest single unit was vacant at the time of the submission of the application, the former Laura Ashley, and this still appears to be available, according to the agent's website.
- 4.15 As such, it is recommended that the Applicant ascertains the availability of the wider site. If it is available, the Applicant would need to fully consider whether the site is suitable and viable to address the same needs as that proposed by the application site.
- 4.16 Until this is addressed, it cannot be fully dismissed as a potentially sequentially preferable site for the development proposed.

Red Lion Site

- 4.17 This is a site where there are a number of different scenarios, but it is noted that from the RLA (again derived from the 2007 Study), the site could either be 0.4ha or if assembled, 0.6ha
- 4.18 It appears that to assemble the 0.6ha site, which is broadly what would be needed to accommodate the development proposed allowing for some flexibility, there would need to be four separate land holdings brought together and in addition to that, three leaseholds would need to be terminated.
- 4.19 This site cannot be discounted if it is unknown whether any site assembly, advocated in the RLA, has commenced to make the site available. If this has, then it needs to be understood whether the site is suitable and viable to accommodate the development proposed.

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- 4.20 Until this has been undertaken this site cannot be dismissed as a potentially sequentially preferable site.
- 4.21 Thereafter, Pegasus Group have not been made aware of any alternative and/or potentially sequentially preferable sites that the Applicant should have considered as part of the assessment.
- 4.22 Having regard to the details submitted with the sequential assessment, it is considered additional information in respect of the availability of the following sites is provided. If they are available, then additional information needs to be provided to fully assess their suitability and viability to accommodate the development proposed.
- Sycamore Road/Woodside Road, Amersham on the Hill

 - Red Lion Site
- 4.23 The applicant will be aware that the PPG is clear in that *"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)"*

5.0 Retail Impact

- 5.1 As noted above, discussions with the Policy Team at BC have confirmed that the validation requirement was consulted upon in March 2020 and this sets a local sequential test threshold, despite the absence of a specific threshold being set in the adopted development plan for the former Chiltern (and South Bucks) area(s).
- 5.2 Nevertheless, the Applicant considers that there is no local floorspace threshold, so has provided what it considers a "proportionate and locally appropriate assessment" (para 7.2).

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- 5.3 It is however welcomed that an assessment has been provided to support the application and this is considered further below.
- 5.4 This element of the assessment is introduced with an overview as to the level of need identified within the RLS. Although this is useful information, need is no longer a retail 'test' within the NPPF. It is however acknowledged that there is some growth in convenience expenditure within the study area when considering the latest findings of the RLS.
- 5.5 The wider assessment parameters are set out at para 7.14 onwards and this is a useful overview of the details to be considered further.
- 5.6 The NPPG provides a checklist¹ of steps to be taken when applying the impact test. We have used this to inform our review.

Establish the state of existing centres

- 5.7 The main centres within the catchment area are Amersham – on-the-Hill and Old Amersham. These are the focus of the Applicant's assessment, and we agree this to be appropriate and proportionate in this location and having regard to the proposal.
- 5.8 The health of the centres are explained at paragraphs 5.7 – 5.23 of the Applicant's statement. It is noted at para 5.9 that the site visits were undertaken during the national lockdown when a number of non-essential retail premises were closed.
- 5.9 Despite this, the Applicant has not cross checked their initial findings with any of the vitality and viability assessments undertaken historically to support the Council's various Retail Studies. This would have been useful to provide some wider context as to the findings at the time and is also advocated by the

¹ ID ref: 2b-018-20190722

Practice Guidance.

- 5.10 In addition, the health check indicators within the Guidance have not been fully assessed. It is likely that this is to do with being able to establish correctly the diversity of uses, vacancy rates and the balance between nationals and independent stores given the visit undertaken during lockdown.
- 5.11 In light of the above, the Applicant should be asked to revisit the centres now that there are no restrictions in place and fully consider the vitality and viability indicators contained within the Practice Guidance (ref: ID: 2b-006-20190722) We consider that such an update by the Applicant will assist Officers in demonstrating that a robust analysis of the health of the centre has been carried out.

Time Frame

- 5.12 The applicant has suggested an opening in 2023 and an assessment year of 2026, which appears reasonable and also aligns with the findings of the RLS.

No development scenario

- 5.13 The Applicant has provided headline information regarding retail expenditure in the catchment area. It does provide the turnover for key locations within the catchment area and how this is predicted to change over time, without the development proposal (Table 2).
- 5.14 Existing stores' turnovers is derived from the results of the shopper survey. This just needs a little more analysis to understand whether the data, which is now 6 years old, is still sufficiently up to date, or whether any new provision and/or any infrastructure investments have changed shopping patterns.
- 5.15 Furthermore, it is also noted that the Applicant has sought to use the population and expenditure information contained within the RLS. Since then,

Experian have released updates to their population and expenditure information and have published an updated retail briefing note in January 2022 (No.19). This has started to take into account the impact of the current pandemic on the retail industry and the likely increase in the pace of change now the pandemic is subsiding. Food retail sales increased significantly during the pandemic as has online shopping – both inevitable consequences of lockdown, but now there are wider inflationary issues which need to be understood moving forwards.

- 5.16 The Applicant should be asked to provide an updated assessment to reflect these updates and consider the implications for the conclusions reached in the original assessment.

Turnover and trade draw

- 5.17 The information used in evaluating the impact is set out at Appendix 2 of the PRS. The turnover figures for Aldi are said to be based on Aldi's published accounts but does not confirm which year or provide any wider context. Pegasus Group just ask that the proposed turnover figures are just compared to the latest data available from Retail Rankings or similar, just so a quick comparison can be undertaken.
- 5.18 It is also noted that the sales density figures are grown by Retail Planner Briefing Note no.18 and this should just be updated to RPN 19, as set out above.
- 5.19 Paragraph 7.37 of the Applicant's statement (referencing Table 4) covers the issue of trade diversion and notes that the majority of trade will be drawn from the existing Tesco store (noted as having just over 56% of existing market share of Zone 2 in para7.30). We would agree with that assumption. The assessment goes on to identify that 50% of the proposed store's turnover is expected to be derived from the Tesco and this is located within Amersham Old Town Local Centre.

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- 5.20 Given that this store is the anchor for the centre and the shortcomings of the health check assessments undertaken during the pandemic, the overall impact just needs to be re-considered by the Applicant to ensure that their statement that *"The level of impact identified (-6.8%) is not sufficient to have a significant adverse impact on the vitality and viability of this store and the wider Local entre" (para 7.42)* remains valid.
- 5.21 Turning to the District and Local Centres, we agree that less trade would be drawn from these locations given the results of the shopper survey (subject to any observations in respect of changes in provision since it was completed) the scale of the provision and also the stores located within these centres from which trade would be drawn. Nevertheless, the Council should ask the Applicant to just revisit the overall impact conclusions having regard to the request to revisit the overall health checks of these centres.
- 5.22 Impact on comparison goods retailers is not assessed by the Applicant. However, the nature of the comparison offer at Aldi is one that is based on impulse purchases rather than conscious diversions from an existing retail destination. Although that still provides some impact, we consider that any such impact would be minimal due to the scale of comparison goods to be offered at this store. Notwithstanding this, the Council may wish to consider controlling the proportion of comparison goods that can be sold from this store.

The need for finer grain analysis

- 5.23 The guidance refers to the need to consider a range of plausible scenarios when assessing the impact on existing centres and facilities. It would be worth checking that there are no planning permission(s) which have been implemented within the catchment for convenience goods since the completion of the shopper survey (which should come out the analysis of shopping patterns) and/or extant consents which need to be considered on a cumulative basis.
- 5.24 If there are no changes in this respect, then we consider that this is

appropriately considered in the matters raised earlier and that there is no need for additional consideration or a finer grain analysis.

Quantitative and Qualitative Analysis

- 5.25 The Applicant's statement has considered the qualitative issues in terms of the retail offer of this proposal against the offer currently available elsewhere (Para 7.58 onwards). These are only relatively high level points and if the Applicant can expand on these further, it would assist their case.
- 5.26 As matters currently stand, the quantitative evidence has not been provided to support the assumptions made. The Council should consider requesting updated information to address the issues identified above and consider whether further work is reasonable to understand trade draw and impact.

6.0 Summary and Conclusions

- 6.1 The Applicant has provided a PRS to support the retail element of its proposal at the application site. That retail element is an Aldi store with a GIA of 1,998 sqm.
- 6.2 The Applicant agreed the scope of the Retail Statement with the Council prior to submission, but not Pegasus Group and that has been taken into account in our review. The response from MRP on behalf of Tesco Stores Ltd has also been considered in the above assessment.
- 6.3 The retail element of the proposal is a main town centre use and the application site is in an out-of-centre location that is not allocated for this use. As such, it is required that the Applicant demonstrates that the sequential test has been passed. On the basis of the evidence provided, we consider that additional evidence needs to be provided in respect of:

- Sycamore Road/Woodside Road, Amersham on the Hill

- Red Lion Site

- 6.4 The Applicant will be aware that the PPG is clear in that *"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)"*
- 6.5 A form of retail assessment has been provided, but it is accepted that this was prepared in respect of the Applicant's position that it does not trigger a local floorspace threshold, whereas the Policy Team at BC have confirmed that the validation requirement was consulted upon in March 2020 and this sets a local sequential test threshold, despite the absence of a specific threshold being set in the adopted development plan for the former Chiltern (and South Bucks) area(s).
- 6.6 The PRS summarises the findings of the Council's Retail Study that identified capacity for additional convenience goods floorspace within this area. It does not undertake the same summary for comparison goods floorspace. This is something that the Council could request but the reality is that the proportion of comparison goods retailing proposed is relatively small and it is unlikely that such an exercise will reveal any issues of significance to the determination of this application.
- 6.7 The bulk of the impact assessment is based on the RLS, whereas the supporting assessment is requested to be updated to cover the following points:
- revisit the vitality and viability of centres now that there are no restrictions in place and fully consider the vitality and viability indicators contained within the Practice Guidance (ref: ID: 2b-006-20190722);
 - The Shopper Survey needs a little more analysis to understand whether the data, which is now 6 years old, is still sufficiently up to date, or whether any new provision an/or any infrastructure investments have changed shopping patterns in the area;

- Update the population and expenditure information to reflect the latest Experian information and also to update the data to reflect Experian's retail planning briefing note from January 2022 (No.19);
- Confirm that there are no planning permission(s) which have been implemented within the catchment for convenience goods since the completion of the shopper survey (which should come out the analysis of shopping patterns) and/or extant consents which need to be considered on a cumulative basis.

6.8 Overall we recommend that the Council seek further information from the Applicant regarding the proposal which we feel, will assist the Council in undertaking a robust assessment of the implications of the proposal for the sequential approach to development and also the vitality and viability of the surrounding district and local centres.

RETAIL IMPACT ASSESSMENT UPDATE RESPONSE

LAND AT FORMER LOOKERS JAGUAR SITE, LONDON ROAD WEST, AMERSHAM

Buckinghamshire Council (BC) instructed Pegasus Group to provide a further review of the Retail Response by Planning Potential on behalf of Aldi Stores Ltd for their proposed development at the former Jaguar site, London Road West, Amersham (ref:PL/21/1309/F). This note provides a further review and our further recommendations to BC and should be read in conjunction with our initial findings of the submitted Planning and Retail Statement prepared in March 2022.

Pegasus Group's previous advice note concluded that in respect of the sequential approach to development and on the basis of the evidence provided, additional evidence needed to be provided in relation to sites at:

- Sycamore Road/Woodside Road, Amersham on the Hill
- Red Lion Site

In respect of the impact of the development it concluded that the supporting assessment was requested to be updated to cover the following points:

- revisit the vitality and viability of centres now that there are no restrictions in place and fully consider the vitality and viability indicators contained within the Practice Guidance (ref: ID: 2b-006-20190722);
- The Shopper Survey needs a little more analysis to understand whether the data, which is now 6 years old, is still sufficiently up to date, or whether any new provision an/or any infrastructure investments have changed shopping patterns in the area;
- Update the population and expenditure information to reflect the latest Experian information and also to update the data to reflect Experian's retail planning briefing note from January 2022 (No.19);
- Confirm that there are no planning permission(s) which have been implemented within the catchment for convenience goods since the completion of the shopper survey (which should come out the analysis of shopping patterns) and/or extant consents which need to be considered on a cumulative basis.

This note responds to these matters further below:

Sequential Approach to Development

It is welcomed that further site visits and additional information has been provided by the Applicant. In respect of the Sycamore Road/Woodside Road, Amersham on the Hill site, the site visit confirmed that the majority of the site was occupied, although the former Laura Ashley remains vacant. The Applicant confirms that the Agent for the site indicates that the site is now 'under offer'. Pegasus Group's investigations confirm that the site is to be occupied by the Hospice of St Francis under the banner of Amersham Owned.

As the site is no longer available, it is agreed that it cannot be sequentially preferable.

In respect of the Red Lion site, the availability of the site was questioned. It is noted that the recent site visit undertaken by the Applicant confirms that the site is largely occupied by a number of operators – identified as Job Centre Plus, a surgery and also an engineering company.

If the Council can confirm that following the identification of this site as a potential retail development, first advocated in the 2007 Retail Study, that no assembly has been commenced, on balance the site would be unavailable at the size needed in a reasonable timeframe to be considered an alternative and sequential site.

Overall, given the additional information provided by the Applicant and assuming that the land assembly point is confirmed by the Council, it could be concluded that there are no sequentially preferable alternative sites for the development proposed.

Retail Impact Assessment

It is welcomed that further information around the health of the centres in question is provided. It is also acknowledged that not all areas of indication are covered, but this is acknowledged in the context of the scale of these centres and the level of information available on matters such as rents and yields.

Nevertheless, the information provided is still very basic and lacks some context. For example, there are references to the proportion of vacant units and for Amersham this is identified as “a very low proportion for a centre of Amersham’s size”. The size of Amersham or any contextualisation of the proportion of vacancy against a typical national indicator has not been provided. This is also the same for Chesham and Old Amersham.

It would have been more useful and robust to provide a full overview of the centre, presenting the mix of uses between the various use classes against something like the GOAD UK averages [Pegasus Group note that GOAD have not updated their classification to the new Use Class order as of yet, so a comparative exercise to previous data would have sufficed]. This would have provided useful context as to where any areas of any particular centre exceed or is below an ‘average’ centre which would have provided an updated guide as to its current strengths and weaknesses.

A comparative exercise against the findings of the Nexus 2017 study would have also been very useful to understand how well these centres had performed in recent years against a context of the Covid pandemic and against the strengths and weaknesses previously set out.

In respect of the quantitative assessment, it is again welcomed that the Applicant has provided updated population and expenditure information in support the application. It is noted that this identifies a slight reduction in the level of convenience expenditure within the zones and this broadly reflects what Pegasus Group are seeing elsewhere with quantitative assessments.

It is also useful to see an updated turnover for the store and also its benchmarking against other convenience stores and also further clarification as to the discussion with the Council, prior to Pegasus Group’s involvement, that there is no need to consider a cumulative impact assessment.

The final point which should be explained further is the trade drawn to the store, especially the balance between:

- Amersham - claims around 25.7% of zone 2’s trade, but is subject to a diversion of 8% of the store’s trade,
- Others in Zone 2 - claim 5.2% of zone 2’s trade, but is subject to a diversion of 2% of the store’s trade,

- Others outside of zone 2 – claim 18.4% of zone 2’s trade, but is subject to a diversion of 25% of the store’s trade

A brief explanation as to how the applicant has arrived at these trade diversion figures would assist the final assessment and its conclusions.

Summary

It is welcome that the Applicant has provided further clarification on a number of matters set out in the original advice. This note provides further feedback on the updated assessment.

This note concludes that;

- Overall given the additional information provided by the Applicant and assuming that the land assembly point is confirmed by the Council in relation to the Red Lion site, it could be concluded that there are no sequentially preferable alternative sites for the development proposed;
- There are still shortcomings in terms of the vitality and viability assessments submitted by the applicant; and
- Further explanation needs to be provided in respect of the identified trade draw.

We trust this update is useful.

Thanks for the updated information from the Applicant, addressing the 3 outstanding matters which are:

- Red Lion Site;
- Vitality and viability assessments; and
- Trade draw

Red Lion

This is really a note for the Council to respond on, but the applicant is clear that no site assembly work has commenced. If this is the case, then the timescale for this to occur would likely prevent this from being a sequentially preferable site for the purposes of this assessment.

Vitality and viability assessments

Previous comments from Pegasus raised questions with the level of information provided within the vitality and viability assessments, making reference to the vitality and viability indicators in the PPG.

The additional information as to how the centres have performed over time is useful and provides some context as to the individual reliance (or not as the case may be) on the convenience goods sector. This also supports where the scheme may draw its trade from. This shows that Amersham on the Hill and Chesham have lower level of convenience provision than the national average, suggesting that they are not and indeed in the recent past haven't been reliant on convenience goods to support the centre. Coupled with this, both have good (higher than UK average) levels of comparison goods.

Both centres presented also have lower levels of vacancy than the UK average and this has remained so over time - notwithstanding that this vacancy data over time is not presented, Pegasus Group are aware of historic figures.

Trade Draw

Moving onto the additional comments provided on trade, it must be stated that Pegasus Group were not advocating the use of a 'gravity model' to consider impacts, merely the comments sought further clarity around the various trade draws presented. This was mainly to ensure that there was sufficient justification around the draws and the assumptions did not result in draws which effectively 'massaged' figures by increasing say clawback and reducing what would be a more localised impacts.

The overlap between Lidl's main food offer and the top up offer at Little Waitrose, M&S Foodhall and the Tesco Express and the remainder of Amersham is noted in the additional information. It is accepted that the Tesco store would be the subject of the largest trade drawn given that both the Aldi and this store would provide principally a main food shopping offer. The further clarification on the draw from other main food stores, mainly in Chesham and identified as 'other sores outside zone 2' is also noted.

Given the extra information and confirmation, the trade draws appear to be reasonable and would unlikely result in a significant adverse impacts on any centre.

Summary

In summary this additional confirmation, clarification and explanation assists in the audit of the Aldi proposal. It is now accepted that there are no sequentially preferable sites and the further information assists in considering the overall vitality of surrounding centres. In light of the trade draws the proposal would not result in an adverse impact.