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Midsomer Norton & Somer Valley Enterprise Zone

Advice on Retail and Leisure 'Impact' Planning Policy Issues

August 2021

Contents

Appendices

1. Introduction

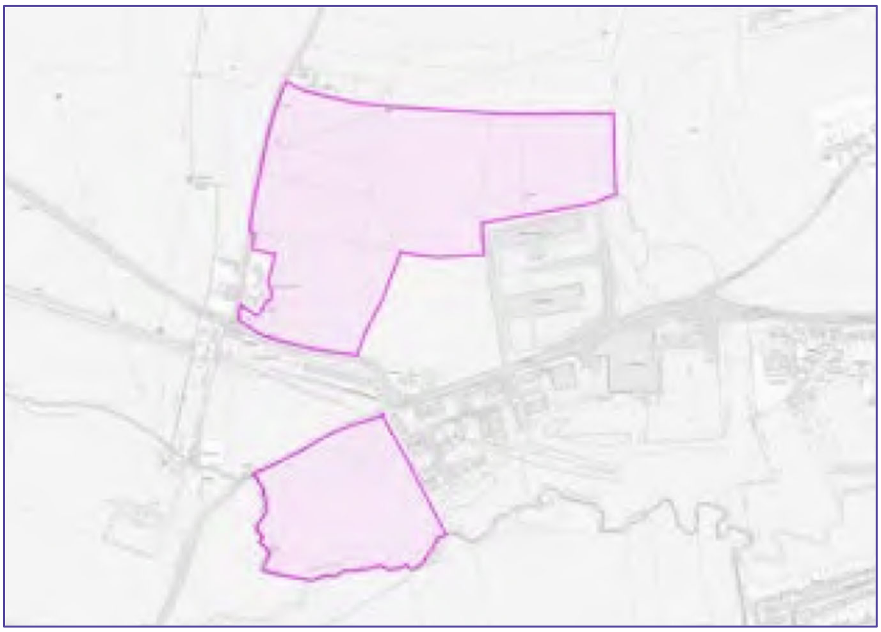
Scope and Purpose

1.1 This report has been prepared by Avison Young ('AY') for Bath & North East Somerset Council ('B&NES') in relation to the potential for retail and certain leisure uses to be included within the Somer Valley Enterprise Zone ('SVEZ') in Midsomer Norton. It focuses particularly on the potential impact of providing retail and food/beverage uses in the SVEZ on the health of Midsomer Norton town centre in order to inform the Local Plan Partial Update.

1.2 The SVEZ was established in April 2017 to support local businesses and to attract new businesses to the area. Enterprise Zones are designated areas across England which encourage business growth and new jobs by providing business rate discounts, tax breaks, superfast broadband and other government support.

1.3 The SVEZ site is located at Old Mills and has been allocated in the B&NES Core Strategy and Placemaking Plan development plan documents. The allocation in the Placemaking Plan is contained in Policy SSV9 and forms two broad areas: firstly an extension of the existing Old Mills Industrial Estate to the south of the A362, and secondly a new industrial estate to the north of the A362. These areas are shown in Figure 1 below.

Figure 1: extract from B&NES Placemaking Plan for Policy SSV9 allocation



1.4 Policy SSV9 in the Placemaking Plan allocates the above areas for light industrial, heavy industrial, warehousing (B1c, B2, B8), builders merchants and car showroom uses. At the present time, no retail. leisure or other main town centre uses are included the development plan allocation.

1.5 In addition to, and looking beyond, the existing development plan position, B&NES is considering two particular aspects. First, B&NES is considering how the planning policy allocation of the SVEZ area should move forward into the next series of development plan documents. In particular, consideration is being given to whether the existing allocation should remain without alteration or whether there are potential opportunities to include provision for retail and/or other main town centre land uses.

1.6 Second, in addition to the above two designations, B&NES is now preparing a proposal for a Local Development Order ('LDO') to cover the SVEZ. This report is not intended to provide advice to B&NES on the specific nature of the main town centre land use content of the LDO but will nevertheless provide useful background information for the purposes of determining the LDO.

1.7 In light of the above, our instructions from B&NES require the content of this report to provide the following areas of analysis and advice:

- the primary focus for this advice is to consider how the introduction of certain retail and food/beverage land uses at the SVEZ site at Old Mills may interact with the function of Midsomer Norton town centre (particularly its future health). In order to undertake this assessment, this report contains the following:
    - a review of existing land use provision in Midsomer Norton town centre
    - a review of the latest available data on food and non-food shopping patterns and also visits to food & beverage facilities by local residents
    - a targeted investigation of retailer and food & beverage operator demand for representation in the Midsomer Norton area

Content of this Report

1.8 The remainder of this report is structured in the following manner:

- Section 2 provides a review of the existing context in Midsomer Norton, including land use surveys of the town centre and a summary of the latest data on food and non-food shopping patterns.
- Section 3 provides the results of our targeted survey of requirements from food, non-food and food/beverage operators.

- Section 4 takes into account the emerging work on the LDO proposal insofar as retail and other main town centre land uses are concerned.
- Finally, in Section 5, we provide an analysis of the potential for an allocation (in the B&NES development plan) of retail and food/beverage uses at the SVEZ site to have an impact upon the health of, investment within in, Midsomer Norton town centre.

1.9 All plans and other documents referred to in the main text of this report can be found in appendices contained at the rear of this document.

2. Existing Context

2.1 An important starting point for an analysis of the relationship between retail and food/beverage uses at the SVEZ site and Midsomer Norton town centre is to gather a suite of baseline data around land uses in the centre and shopping / F&B patterns. Therefore, this section of our report provides information from a survey of the town centre in May 2021 and also a review of the latest available shopping patterns data for this part of B&NES district.

Land Use Profile

2.2 In order to provide a baseline for our assessment, it is important to understand the range of retail and service uses within Midsomer Norton town centre. Table 2.1 below reproduces the land use survey data for the town centre contained within the 2018 Retail Study alongside the results of a survey undertaken by AY in May 2021.

2.3 As noted in the previous section of this report, the May 2021 land use survey has been timed to coincide with the easing of restrictions on the opening of shops and services in order to understand how the centre has recovered following the impact of the COVID-19 pandemic during 2020 and early 2021. However, this survey should be seen as a snap-shot in time and it is recommended that land uses in the centre are kept under review during the application for, and consideration of, the SVEZ LDO.

2.4 The content of Table 2.1 below is based upon regular surveys of the centre undertaken by Experian GOAD and updated by AY in 2018 and May 2021. A copy of the updated Experian GOAD plan for May 2021 can be found in Appendix I to this report.

Table 2.1: retail land use profile of Midsomer Norton town centre – 2018 and 2021

Sector	**2018**			**2021**		
	No.	**%**	**UK Average %**	**No.**	**%**	**UK Average %**
Convenience	11	8.0	9.4	14	10.3	9.9
Comparison	51	37.2	39.0	45	33.1	34.8
Service	60	43.8	38.3	54	39.7	39.1
Other	1	0.7	1.2	3	2.2	1.1
Vacant	14	10.2	12.1	20	14.7	15.1
Total	**137**	**100**	**100**	**136**	**100**	**100**

Source: 2018 B&NES Retail Study report and May 2021 AY land use survey

2.5 The above table provides the following information:

- The number of convenience goods retailers in the centre have increased from 11 to 14 between 2018 and 2021. At the time of the 2018 survey, convenience goods retailers comprised around 8% of all surveyed units in the centre. This has now risen to 10.3% of all surveyed units. This increase in the proportion of convenience retailers is in line with the national trend although it should be noted that the increase in Midsomer Norton town centre out-performs the national trend and is now slightly higher than the national average.
- The number of comparison goods retailers in the town centre has fallen from 51 in 2018 to 45 in 2021. This change also mirrors the national trend and the proportion of comparison goods retailers in the centre, as a proportion of all surveyed units, remains slightly below the national average.
- Nationally, the general trend over recent years in the proportion of service uses in town centres has been for a modest increase[1]. However, the trend in Midsomer Norton town centre is the opposite, with a falling proportion of service uses: 43.8% in 2018 to 39.7% in 2021. The total number of surveyed service uses fell from 60 in 2018 to 54 in 2021. Having been around five percentage points above the national average in 2018, the proportion of service uses in the town centre is now close to the national average.
- The number of surveyed vacant units in the town centre has risen from 14 in 2018 to 20 in 2021. Whilst vacancies occur in all types of town centre, a rise in vacancies is never a welcome sign for the health of a centre. Vacant units now comprise 14.7% of all surveyed units in Midsomer Norton town centre. This proportion remains below the national average although the gap between the local level and the national average has noticeably narrowed over the past three years. The updated version of the Experian GOAD plan at Appendix I shows the location of the currently vacant units in the town centre.

2.6 With regards to the presence of different types of retail and service businesses in the town centre, the content is unsurprisingly dominated by local independent traders, bearing in mind the scale and location of Midsomer Norton. The town centre does, however, have a number of notable national multiple retailers, including reasonably large sized foodstores operated by Sainsburys and Lidl on the northern side of the High Street. The market shares associated with these stores are discussed in the next sub-section of this report although it is a reasonable assumption that they both make a positive contribution to the health and attractiveness of the town centre in terms of the volume of visits and also the potential for linkages with other uses in the town centre. Other convenience goods retailers

[1] 38.3% in 2018 and 39.1% in 2021.

in the town centre include a McColls convenience store, three bakers, a butcher and a small number of newsagents/general stores. Within the convenience goods sector the grocery and bakery sectors have a proportion of businesses which are above the current national average.

2.7 Within the comparison goods retail sector, data[2] on the various sub-categories indicates the following:

- there is a general under-representation of clothing and footwear retailers in the town centre: 2.2% of surveyed units, as opposed to a national average of 7.9%.
- the proportion of retailers selling DIY / hardware related goods (2.9%) is above the national average of 2.2%.
- the proportion of furniture, floorcoverings, books and stationery retailers in the centre is generally in line with the national average.
- the proportion of retailers selling recreational goods such as sports goods, toys and cycles (3.7%) is twice as high as the national average (1.7%).

2.8 As noted above, the majority of comparison goods retailers in the town centre are local independent traders, although a small number of national multiples are present including M&Co and The Entertainer toy store. For many years the centre had a reasonably large Argos store on the northern side of the high street (with its own car park) although this has now permanently closed.

2.9 Within the service sector there are some notable differences between the proportions of businesses and their respective national averages. Food and beverage outlets occupy 11.8% of all surveyed units against a national average of 17.9%. In contrast, the proportion of health and beauty services (such as hair salons) comprises 16.9% of units against a national average of 12.7%. Similarly, the proportion of financial services (6.5%) is above the national average of 3.3%.

Shopping Patterns

2.10 For the purposes of assessing shopping and food/beverage patterns for this advice report we have used the results of a household survey commissioned for the 2018 retail study (and undertaken in April 2018). A copy of the geographic area covered by the survey is shown on the plan contained at Appendix II to this report.

[2] updated by AY's land use survey of the town centre in May 2021

2.11 It will be noted that Midsomer Norton lies within Zone 10 of the study area (alongside Radstock and the surrounding rural hinterland[3]). The survey was structured to gain information on main and top-up food shopping patterns and also information on several different types of non-food shopping. The survey also gathered data on leisure patterns, including visits to restaurants, pubs and bars, alongside data on how local residents used their town centres.

2.12 For the purposes of the analysis in the 2018 retail study, the results of the 2018 survey were compared against the results of an earlier survey undertaken in 2014 and are summarised below.

2.13 In relation to convenience goods shopping for main and top-up food shopping trips across the study area, and associated with stores within Midsomer Norton town centre, these can be found in Table 2.2 below. It indicates that the catchment of the town centre is generally restricted to Zone 10 of the study area and is able to attract main and top-up food shopping trips from both Midsomer Norton and Radstock residents.

Table 2.2: market share of Midsomer Norton town centre for main and top-up food shopping in 2014 and 2018 household surveys

	Zone												
	1	**2**	**3**	**4**	**5**	**6**	**7a**	**7b**	**8**	**9**	**10a**	**10b**	**11**
2014 Survey													
Main	0.91%	0.69%	0.00%	0.00%	0.80%	0.00%	0.00%	0.00%	0.00%	2.06%	14.13%	27.34%	-
Top-up	0.47%	0.00%	0.86%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	17.86%	33.68%	-
2018 Survey													
Main	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	17.2%	19.3%	0.0%
Other Main	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	21.8%	37.7%	0.0%
Top-up	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	16.6%	31.7%	0.0%
Other top-up	0.0%	2.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	16.0%	28.9%	0.0%

2.14 In terms of a location which residents do most of their main food shopping, Midsomer Norton town centre has seen an increase in popularity amongst Radstock residents and a fall (from 27% to 19%) amongst Midsomer Norton residents. The 2018 survey does show, however, that whilst 19% of local residents used the town centre for most of their main food shopping, 38% also visited the centre for other 'second choice' main food shopping needs. In terms of top-up food shopping trips, the popularity of the town centre has not altered significantly.

[3] including Paulton, Peasedown St John and Chilcompton. For the purposes of the survey results, Zone 10 was split into two parts: Zone 10b comprising the urban area of Midsomer Norton, Radstock and Paulton.

2.15 Table 2.3 below outlines the market share of Midsomer Norton town centre for the different types of comparison goods shopping across the study area and between the 2014 and 2018 household surveys.

Table 2.3: market share of Midsomer Norton town centre for comparison goods shopping in 2014 and 2018 household surveys (excluding internet / special forms of trading market shares)

	Zone												
	1	**2**	**3**	**4**	**5**	**6**	**7a**	**7b**	**8**	**9**	**10a**	**10b**	**11**
2014 Survey													
Clothes / footwear	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	5%	3%	-
Furniture / floorcoverings	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	18%	22%	-
Household textiles	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	7%	24%	-
Domestic appliances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	17%	22%	-
Smaller electrical goods	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	18%	18%	-
DIY goods	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	6%	19%	-
Health and beauty goods	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	40%	59%	-
Luxury and recreational goods	1%	2%	0%	0%	0%	0%	0%	0%	0%	0%	21%	37%	-
2018 Survey													
Clothes / footwear	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	8%	0%
Furniture / floorcoverings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	29%	0%
Household textiles	0 %	0%	0%	0%	0%	0%	0%	0%	0%	0%	11%	15%	0%
Domestic appliances	0%	2%	0%	0%	0%	0%	0%	0%	0%	1%	6%	30%	0%
Smaller electrical goods	0%	0 %	0%	0%	0%	0%	0%	0%	0%	0%	4%	14%	0%
DIY goods	0%	1%	0%	0%	0%	0%	0%	0%	0%	1%	20%	47%	0%
Health and beauty goods	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	26%	58%	0%
Luxury and recreational goods	0%	0%	0 %	0%	0%	0%	0%	0%	0%	0%	21%	25%	0%

2.16 Table 2.3 above shows how Midsomer Norton attracts different types of comparison goods shopping trips and how this has changed over the period 2014-2018. It shows a higher market share within Zone 10b (Midsomer Norton, Radstock and Paulton) and a mixed picture of how the centre attracts its comparison goods trade. For example, there is an increasing market share for clothing/fashion, furniture/floorcovering, domestic appliances and DIY goods from Zone 10b residents. There has been, however, fall in market share in luxury/recreation and household textile goods. The 2018 survey indicates that the highest market shares associated with Midsomer Norton town centre are in the following categories: furniture/floorcoverings, domestic appliances, DIY goods, health/beauty goods and, to a lesser extent, luxury/recreational goods.

2.17 The 2018 retail study estimated that Midsomer Norton town centre had an annual comparison goods turnover of £29.3m, with £19.4m of this total being derived from Zone 10b residents. In relation to the contribution that individual types of comparison goods shopping make towards the overall comparison goods turnover of the town centre, this is shown in Table 2.4 below.

Table 2.4: contribution of individual comparison goods shopping categories to overall comparison goods turnover in Midsomer Norton town centre

Goods category	**Turnover**	**% of Total Turnover**
Clothing / footwear	£1.8	6.1%
Furniture and floorcoverings	£2.1	7.2%
Household textiles	£0.3	1.0%
Household appliances	£1.8	6.1%
Audio / visual equipment	£1.1	3.8%
DIY	£2.5	8.5%
Health and beauty goods	£8.9	30.4%
Books, jewellery, luxury, recreational goods	£10.8	36.9%
TOTAL	£29.3	100%

2.18 It can be seen that the biggest contributors to overall comparison goods turnover are the health/beauty and books/jewellery/recreational goods categories. They contribute around two-thirds of all comparison goods turnover, or around £20m of expenditure. Other non-bulky categories, such as clothing/footwear and household textiles, contribute a much lower amount (amount 7% collectively).

2.19 Traditional 'bulky goods' categories – i.e. DIY, furniture, floorcoverings, electrical goods – contribute around 26% of the overall study area derived turnover of the town centre. Of these individual categories, the DIY sector makes the largest contribution at 8.5%.

2.20 In terms of the overall turnover associated with Class E(a)[4] floorspace, the comparison goods sector contributes £29.3m, whilst the 2018 retail study indicates that the convenience goods sector (Lidl, Sainsburys and smaller convenience stores) contributes £26.2m. Therefore, it can be said that both sectors contribute a reasonably equal amount of expenditure to the town centre, although the number of comparison goods units in the centre is around three times greater than the number of convenience goods retailers.

2.21 The other area of focus is in relation to food and beverage uses. The household survey commissioned to support the 2018 retail study gathered information regarding visits to pubs and bars, along with

[4] formerly Class A1 floorspace

visits to restaurants. In relation to the information provided by the residents of Zone 10b, the survey provided the following market share levels:

- With regards to visits to pubs and bars, 36.5% of Zone 10b residents normally visit premises in Midsomer Norton town centre, with 3.4% visiting Radstock town centre. In relation to the leakage of trips outside of the local area, 22.7% of local residents normally visit pubs and bars in Bath city centre.
- In relation to visits to restaurants, the proportion of combined visits retained amongst Zone 10b residents at Radstock and Midsomer Norton (24%) is very similar to share of trips travelling to Bath (25.8%). Much smaller levels of trips 'leak' out of the local area to Bristol, Shepton Mallet and Frome.

2.22 The foregoing information in this section regarding the land use profile of the town centre and data on shopping and food/beverage patterns will be used to further understand and assess the potential impacts of incorporating retail and leisure uses within any updated development plan allocation for the SVEZ area.

3. Retailer / Food & Beverage Demand

3.1 In the next section of this advice report (Section 4), we summarise our understanding of the current draft LDO proposal for the SVEZ site. Alongside this information, AY have agreed with B&NES officers that this advice report will be usefully informed by a focused review of demand for retail and food/beverage floorspace in the Midsomer Norton area.

3.2 Research on retailer / food & beverage demand across B&NES district has been a feature of previous evidence base retail and town centre studies in B&NES, although: (A) given the fast-moving pace of the retail and food/beverage sectors; and (B) given the need to ensure that this analysis considers the relationship between the SVEZ and Midsomer Norton town centre, it is important to update the research on retailer demand.

3.3 Within previous studies, research on retailer demand has been wide-ranging, although for the purposes of this advice report we have undertaken a more focused assessment of demand. This has been directed at the businesses which AY consider are most likely to be interested in taking space in the Midsomer Norton area. These broad categories are as follows:

- Those retailers who are most likely to favour representation in mid-sized towns such as Midsomer Norton, including mixed goods retailers who sell a wide selection of comparison and convenience goods products.
- Those food and beverage operators who, in addition to town centres, sometimes operate from out of centre locations.
- Those grocery retailers which are currently active in the market in relation to mid-sized towns such as Midsomer Norton.

3.4 Based upon the above parameters the results of our research are as follows:

- There is potential demand from mixed goods discount-orientated retailers, for occupation of units between 20,000sqft – 25,000sq ft (plus a potential extension garden centre area of circa 8,500sq ft garden centre). Feedback provided by these retailers indicates that demand for Midsomer Norton and the SVEZ area would be reinforced if a grocery store was also adjacent.
- There is potential demand for a 1,800sq ft coffee shop style unit within the SVEZ area.
- Also within the food and beverage sector, our research has found that there is potential demand from 'fast food' operators, for circa 2,500sq ft – 4,000 sq ft units (including a drive-through element).

- Finally, AY is aware of requirements from grocery operators, both of which are in the region of 20,000sq ft gross. It is understood that various locations across Midsomer Norton would be considered, although there is no certainty that the SVEZ area would be one of those.

3.5 In relation to other comparison goods retailers, AY are of the opinion that, due to the size of Midsomer Norton and its catchment, this will significantly constrain interest from other operators who would normally occupy large retail units in out of centre locations such as the SVEZ area. The reasons for this are as follows:

- Whilst Midsomer Norton, along with Radstock and Paulton, is a significant settlement in the context of the B&NES settlement hierarchy, the population of the wards across these areas is circa 25,000 people. Whilst this size of catchment population is able to support a reasonably wide range of shops and services, including a number of grocery stores, it is not, in our opinion, of a size which can sustain large national multiple comparison goods stores.
- This is reinforced by the proximity of Bath and Bristol, which will be the first choice location for retailers who require medium to large retail units. The size of the catchments associated with these settlements will be much more attractive to 'big box' retailers, as they will be able to provide more viable retailing locations.
- Finally, retailer demand at the present time is being affected by two factors: (A) structural change in the parts of the comparison goods retail sector nationally; and (B) the current impact of the COVID-19 pandemic on retailer sentiment and actions. Over the last few years a number of comparison goods retailers have decided to scale back their store opening programme, whilst others have made the decision to close a number of stores in non-profitable locations. Our experience suggests that these trends are likely to impact upon smaller-sized settlements, with some retailers preferring to concentrate upon larger towns and cities. In addition, whilst the full effects of the COVID-19 pandemic have yet to be fully understood, a significant shift in shopping patterns has the potential to reduce the usage of physical stores (as a consequence of more on-line shopping) which, as a consequence, will reinforce the reluctance of retailers to consider opening new stores.

3.6 The foregoing analysis helps to set the context for the assessment of potential impacts of retail and food/beverage floorspace at the SVEZ site on Midsomer Norton town centre, focusing upon the style of business which could be attracted (and whether it would be prudent to impose controls should the principle of retail use be acceptable).

4. The Emerging LDO Proposal

4.1 As noted in Section 1 of this advice report, it is not the purpose of this advice to provide specific observations on the content of the emerging LDO proposals. However, the emerging LDO proposal is nevertheless a useful contributor to our advice for the purposes of emerging development plan policy for the updated SVEZ area allocation.

4.2 During the course of preparation this advice report, AY has liaised with the members of the project team instructed by B&NES to prepare the LDO and has discussed the potential content of the retail and other main town centre land use elements.

4.3 The content of the emerging LDO is considering the following land uses:

- Class E retail
- A public house / restaurant
- A hotel
- Class E office space
- Class E food and beverage floorspace

4.4 With regards to the above proposed land uses, the information provided by the B&NES LDO team on the emerging LDO does not provide any further details of the proposed main town centre uses. In relation to the issue of 'impact', which focuses upon retail and leisure land uses only, the level of detail provide does not necessarily cause an issue for the two elements of food and beverage use, although it is likely that further information will be required to assess the Class E(a) retail use element. In particular, it would be useful to understand whether: (A) a completely 'open' Class E(a) use is being sought; or (B) if a focused/restricted retail use is being sought (including whether the retail use is to be one single unit or multiple separate units).

4.5 Our advice report therefore proceeds on the basis of the retail and leisure land uses described above, including the possibility that the Class E(a) retail use could be: (A) used for the sale of any type of retail goods (in any combination); and (B) the floorspace could be used as one large unit or, alternatively, sub-divided into two or more separate units.

5. Analysis

5.1 Based upon the content of the preceding four sections of this advice report, an assessment of the potential impact of retail and leisure uses in the SVEZ area will, in our opinion, be guided by the following issues:

- previous assessments of the 'need' for retail floorspace in the Midsomer Norton and Radstock area;
- the land use profile of Midsomer Norton town centre;
- shopping patterns amongst local residents;
- the potential retail and leisure land use content of the SVEZ area, including potential operator requirements.

5.2 As a starting point for the assessment of potential impact, we consider it important to outline the parameters for the assessment of potential impact. The NPPG notes that, in relation to plan-making:

> *"If plan policies are based on meeting the assessed need for town centre uses in accordance with the sequential approach, issues of adverse impact should not arise. The impact test may however be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of particular centres".*

5.3 We consider that the second part of this guidance is particularly important for Midsomer Norton. Whilst most 'town centres' are currently facing a series of pressures due the COVID-19 pandemic and on-going structural change in the retail and leisure sectors, small to medium sized town centres such as Midsomer Norton can face particular pressures due to their size and location within the wider catchments of larger centres such as Bristol and Bath. The susceptibility of the town centre can come from a number of sources, including the scale of competition which could be provided at the SVEZ site, plus the range of goods to be provided.

5.4 It should be noted that competition from out of centre retail floorspace would not be a new phenomenon for the Midsomer Norton area, given the presence of the large Tesco supermarket and the Wickes DIY store. The town centre's health is no doubt influenced by the presence of these stores, particularly the significant market share attained by Tesco, although they do not appear to cause any significant negative influence. However, the addition of a further 5,000sq m of retail and food/beverage floorspace has the potential to change this dynamic, particularly where a wide range of products are available for purchase.

5.5 Turning to the assessment of 'need' for convenience and comparison goods floorspace, the most recent analysis for retail floorspace was conducted as part of the 2018 retail study. For convenience goods floorspace, the 2018 study found a falling level of quantitative need and no overall qualitative deficiency/need. However, the 2018 study did conclude that a case for a new foodstore/net additional convenience goods floorspace could still be made so long as this new provision was placed in or adjacent to the town centre. In relation to comparison goods shopping, the 2018 retail study concluded that: (A) there was not a quantitative need for net additional comparison goods floorspace; (B) qualitative factors of need in Midsomer Norton revolve around retention of floorspace, rather than expansion, unless a case can be made for new provision which stems some of the current leakage of trips/expenditure to other settlements.

5.6 Within this context, the case for allocating new retail floorspace within the SVEZ area is not a particularly strong one. Whilst there are not any current 'live' investment projects in the town centre which could be materially affected by retail floorspace at the SVEZ site, the provision of convenience goods retail floorspace would simply reinforce the current balance of provision in the town, whilst the case for new comparison goods provision would appear to rely on the ability to claw back lost trips/expenditure. In relation to the latter, it is likely that the interest shown by mixed goods retailers would achieve this to a certain extent, although we consider that it is equally likely that a similar amount of trade would be diverted from Midsomer Norton town centre. This would primarily be comparison goods expenditure, although there would also, in our opinion, be convenience goods trade diversion also. This is a potential concern given the retail land use profile of the town centre and also the type of comparison goods expenditure which makes an important contribution to the health of the centre.

5.7 Considering other types of comparison goods retail floorspace, there is the potential for bulky goods floorspace to have a lesser impact upon the health of the town centre, due to the nature of the products being sold and also the proportionate contribution that these products make to the overall health of the centre. There would, however, still be an impact on trade in town centre and we would recommend that further assessment work is undertaken once more detailed proposals come forward. It is likely that a more specialist retail offer, which isn't available in Midsomer Norton, and can help to claw back trade, will be the most appropriate type of use (particularly where the floorspace proposed is in one single large retail unit).

5.8 With regards to the potential for food and beverage floorspace, the proportion of these uses in the town centre is notably below the national average. There is a broad range of food and beverage uses, including cafes, restaurants, take-aways and public houses, occupying just over 10% of all surveyed premises. This provides an important contribution to the overall land use profile of the centre although it is not an overly significant sector for the centre. In our opinion, provision of an appropriate amount of food and beverage floorspace is unlikely to have a significant negative effect upon the town centre as there are opportunities to increase choice in provision in the local area. In addition, the provision of the public house / restaurant is important to the ability to attract a hotel use to the SVEZ area, whilst the general provision of food and beverage uses will also: (A) add to the attractiveness of the SVEZ area as an employment location; and (B) provide a useful facility for local employees.

5.9 Overall, whilst there certainly are opportunities for retail and food/beverage uses to be accommodated with the SVEZ area, it is our opinion that controls in relation to the scale of floorspace and the type of use would be required as part of any revision to the existing development plan allocation. We consider that a clear and robust case can be made for a refinement to the existing development plan allocation to include main town centre uses although they will need to be provided in a proportionate and controlled manner. Our advice on the opportunities for consideration for a refinement to the SVEZ development allocation is as follows:

- A large foodstore / supermarket. Whilst previous evidence base documents for the B&NES development plan have acknowledged that there is a need for additional convenience goods floorspace in the Midsomer Norton / Radstock area, the strategy for meeting this need was to focus new provision in and around the town centre. Whilst there may be differing attitudes to the attractiveness of the SVEZ area for a new foodstore, and it is likely that a large source of trade diversion would be from the nearby Tesco supermarket, there remains concern over the potential impact on the town centre, including the potential for store closures. We therefore consider the sale of grocery items from the SVEZ allocation should be significantly restricted or not allowed for in any refined allocation.
- Mixed goods retailers / sale of non-bulky comparison goods items. We consider that the sale of non-bulky comparison goods items should not be contemplated for any refinement to the SVEZ development plan allocation. These types of goods make an important contribution to the health of Midsomer Norton town centre and, in our opinion, it is likely that their introduction could introduce a competing retail destination into a location which has a small overall catchment. As a consequence, whilst there is clear interest from mixed goods retailers for representation in Midsomer Norton, we do not consider that, based upon the available evidence, this would represent an appropriate type of retail use in an out of centre location (as mixed goods are: (A) becoming increasingly popular; and (B) they sell a wide range of convenience and comparison goods which will compete with a number of stores in Midsomer Norton town centre).
- Bulky comparison goods retailers. The opportunities for the provision of bulky comparison goods retailers in the SVEZ area are considered to be greater given the lower level of potential trading overlap. At the present time, we consider that there is likely to be a lack of demand for such uses

(due to current trading conditions and the size of the Midsomer Norton catchment) although, in principle, they do have the potential to offer a wider range of product choice and claw back currently lost shopping trips. Should such uses be contemplated then we would recommend that further assessment work is required by B&NES as and when specific proposals come forward, with further information required on the full range of goods which could be sold.

- Food and beverage floorspace. As noted above, we consider that the introduction of a proportionate level of food and beverage uses to the SVEZ allocation would be a positive refinement to the existing allocation. Their introduction would provide for greater choice for the local area and also assist with the SVEZ as a local for employment uses. We consider that the current draft proposal for the content of the LDO provides an appropriate level of provision, including a public house / restaurant use which can support the attractiveness of the proposed hotel use.
- Scale of retail floorspace and units. Whilst this issue would also be relevant to the sequential test, we consider that the number and scale of retail and leisure units is also a salient factor for the assessment of 'impact'. We consider that the greater the number of units the greater the potential for a larger negative impact upon the health of, and existing investment within, Midsomer Norton town centre. This is due to the potential for a range of different types of retailer to be accommodated and, as a consequence, to establish a rival retail/leisure destination to the town centre. It is to be noted that, by their very nature, the sizes of food and beverage units will be reasonably small and therefore the appropriate control for this sector will be the overall scale of floorspace. For retail (Class E(a)) uses, the starting point for consideration should be larger units as they are generally better suited to comparison goods retailers selling bulkier items.

5.10 The contents of this advice report will provide a contribution to the assessment (by B&NES) as to whether the existing SVEZ development plan allocation should be amended to include retail and food/beverage land uses. Based upon the contents of this report, we would recommend that should such uses be considered then the content of the revised development plan allocation should provide for a series of assessment criteria in order to judge future planning applications / LDOs:

- A requirement to submit an impact assessment based upon the scale, format and type of retail and leisure floorspace proposed.
- The impact assessment should consider potential impacts upon the health of, and investment within, nearby 'town centres', particularly Midsomer Norton town centre.
- The allocation should indicate that there is potential for a controlled amount of retail and food/beverage floorspace. It should be clear that, as part of the assessment of impact, a key

consideration will be to ensure that any retail and/or leisure uses at the SVEZ site do not undermine the role and function of Midsomer Norton and Radstock town centres and, instead, provide a complementary function which also benefits the operation and attractiveness of the SVEZ.

Appendix I

Midsomer Norton May 2021 Experian GOAD Plan

50 metres

Experian Goad Plan Created: 22/06/2021
Created By: Avison Young

experian

Midsomer Norton

AVISON YOUNG

50 metres

Experian Goad Plan Created: 22/06/2021
Created By: Avison Young

Map data

For more information on our products and services:
www.experian.co.uk/goad | goad.sales@uk.experian.com | 0845 601 6011

experian.

Midsomer Norton

AVISON YOUNG

50 metres

Experian Goad Plan Created: 22/06/2021
Created By: Avison Young

Map data

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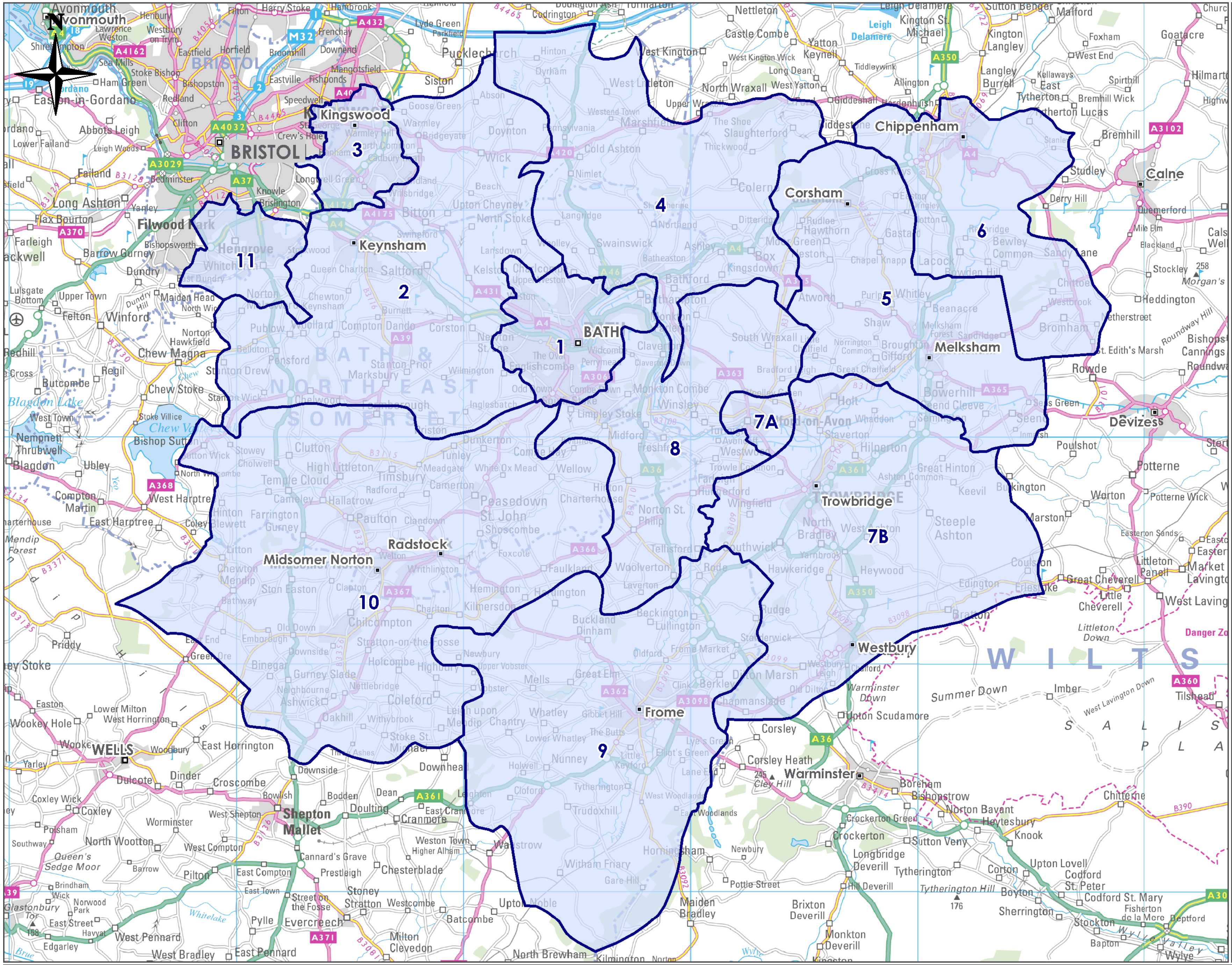
Appendix II

Plan of Study Area for 2018 Household Survey and 2018 Retail Study Analysis



GVA

Study Area & Household Survey Zones

KEY

Study Area

Survey Zone

Zone	Postal Sectors
1	BA1 1/2/3/4/5/6, BA2 1/2/3/4/5/6
2	BA1 9, BA2 9, BS30 5/6, BS31 1/2/3, BS39 4
3	BS15 1/3/4/8/9, BS30 7/8/9
4	BA1 7/8, SN13 8, SN14 8
5	SN12 6/7/8, SN13 0/9
6	SN14 0, SN15 1/2/3
7A	BA15 1
7B	BA13 2/3/4, BA14 0/6/7/8/9
8	BA2 7, BA15 2
9	BA11 1/2/3/4/5/6
10	BA2 0/8, BA3 2/3/4/5, BS39 5/6/7
11	BS4 1, BS13 0, BS14 0/8/9

Bath & North East Somerset Retail Study 2018

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