

Appendix 2

Further Retail Note in Response to Inspectors Question - Retail Impact Threshold for Hardwick Road area of King's Lynn



1. This Further Retail Note has been prepared by Alder King Planning (AK Planning) on behalf of the Borough Council of King's Lynn and West Norfolk (the Council). It follows our earlier Retail Note dated January 2023 and provides further evidence to support the proposed retail impact floorspace threshold for the Hardwick Road area of King's Lynn.
2. As set out in our January 2023 Retail Note, Paragraph 16 of the National Planning Policy Guidance: Town Centres and Retail (NPPG) provides specific guidance in relation to setting impact floorspace thresholds. The January 2023 Retail Note considers the key matters set out in paragraph 16 and advises, having regard to the assessment that the proposed nil impact threshold set out at policy LP08 is too low and should be revised/increased to 500sq m gross.
3. We understand that the Inspectors currently examining the Council's Local Plan have asked for further evidence to support our recommended impact threshold of 500sq m gross. The remainder of this note provides this further evidence.
4. In considering the setting of a local impact threshold, it is important to give consideration to the type of development (relating to convenience and comparison goods retail uses, and leisure uses) which would, in practice, provide space for key operators who could act to 'anchor' a centre. Should one of these anchor units or operators leave a centre, there will likely be the potential for a significant adverse impact to arise. As such, where there is genuine potential for a planning application to divert a material level of expenditure away from a defined centre, or potentially remove a key occupier from that centre, there will likely be a requirement to consider the impacts arising from the proposal in detail.
5. It is considered that town centre anchor units in a town the size of Kings Lynn will typically provide at least 500sq m of gross floorspace. Such a unit could potentially accommodate an operator of importance, which is capable of attracting shoppers to a centre, thus increasing the potential for linked trips with other retailers and businesses in the town centre.
6. The latest town centre use composition of King's Lynn Town Centre provided by Experian is summarised in Figure 1 below. Experian undertake land use surveys of town centres and retail parks across the UK and are widely used by retail/town centre planners in planning application and local plan evidence base work.

Figure 1: King Lynn Town Centre - Composition

	Total Area (sq m)	Total Area (%)	National Average Floorspace (%)	Total No. of Units	Total Units (%)	National Average No. of Units (%)
Convenience	6,830	7	16	22	6	9
Comparison	34,880	37	30	125	32	27
Retail Services	7,430	8	7	62	16	16
Leisure Services	18,150	19	26	74	19	25
Financial & Business Services	12,440	13	7	52	13	9
Vacant	14,690	16	14	53	14	14
Total	94,420	100	100	388	100	100

Source: Experian Goad

7. Figure 1 show that overall, Kings Lynn Town Centre (as defined by Experian) provides 388 retail and service units within 94,420sq m gross floorspace. The main anchor stores in the town centre include:

- Marks & Spencer
- Sainsbury's
- H&M
- Boots
- Primark
- WHSmith
- Lidl
- River Island

8. Figure 2 below provides a summary breakdown of the number of units in the town centre above and below 500sq m gross. The unit size breakdown information has also been provided by Experian.

Figure 2: King Lynn Town Centre – Unit Size

	No. of Units >500sq m gross	% of Units >500sq m gross	No. of Units <500sq m gross	% of Units <500sq m gross
Convenience	2	9%	20	91%
Comparison	14	11%	111	89%
Retail Services	1	2%	61	98%
Leisure Services	8	11%	66	89%
Financial & Business Services	4	8%	48	92%
Vacant	5	9%	48	91%
Total	34	9%	354	91%

Source: Experian Goad

9. Figure 2 shows that there are a relatively limited number of units greater than 500sq m gross in the town centre. All retail/service sectors in the town centre have less than 11% of units greater than 500sq m gross. In terms of the retail service sector, given that the sector in the town centre comprises mainly hairdressers and beauty salons operators it is not unusual that only 2% of units are greater than 500sq m gross floorspace. Overall, including vacant units, less than 9% of all units have a floorspace greater than 500sq m gross.
10. Accordingly, in this context, given the size and limited number of anchor units in Kings Lynn Town Centre, the potential for a 500sq m sized unit to be able to accommodate an operator of importance for the Town Centre, and the potential for significant adverse impacts to arise as a result of a potential anchor unit closing, relocating or diverting their store requirement to Hardwick Road we maintain our recommendation that the retail impact floorspace threshold of 500sq m gross is set out in Policy LP08.
11. It is important to note that the floorspace threshold recommendation is also reflective of the increasing town centre vacancy rate (see January 2023 Retail Note) and the potential for out-of-centre retail development at Hardwick Road to become even stronger in the future at the expense of the vitality and viability of King's Lynn Town Centre. Hardwick Road offers a range of comparison goods, which traditionally would have been sold from Kings Lynn Town Centre. As such, the recommendation is reflective of the need to safeguard against the Hardwick Road out-of-centre retail destination becoming even stronger at the expense of the health of the Town Centre.