



Report

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Birmingham
B1 2JB

Mill Green Designer Outlet Village Critique of Town Centre Impacts

August 2015

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For and on behalf of GVA Grimley Ltd

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1. Introduction

1.1 This report has been prepared by GVA in response to a joint instruction by Walsall Metropolitan Borough Council, Lichfield District Council, Stafford Borough Council and Wolverhampton City Council (“the partner authorities”) to carry out an independent review of town centre impacts associated with a planning application for a designer outlet centre at Mill Green, Cannock (“MGDOV”).

1.2 The application has been submitted to Cannock Chase District Council (“CCDC”) in hybrid form (Ref. CH/15/0048) on behalf of Development Securities (Cannock) Ltd (“the applicant”) and constitutes the following:

Full application for Phase 1 comprising remodelling of existing landform of the site; erection of up to 23,758 m² (GEA) of commercial units comprising a mix of uses at ground floor, including retail, restaurants / cafes and drinking establishments (Classes A1, A3 and A4) and outdoor play areas and centre management suite and retail storage areas at first floor level; diversion of water courses and sewers and associated drainage works. Associated works include hard and soft landscaping, new vehicular and pedestrian access from A460 / Eastern Way including underpass and formation of two pedestrian accesses to the adjoining Mill Green Nature Reserve and associated works to include formation of part of a Heritage Trail, and upgraded pedestrian and cycle route along Eastern Way, provision of temporary and permanent car and coach parking.

Outline application for Phase 2 comprising erection of up to 10,389 m² (GEA) of commercial units comprising retail uses at ground floor (Class A1), erection of multi storey car park with associated access and hard / soft landscaping (all matters reserved except access).

1.3 In accordance with our instructions from the partner authorities, we have carried out a review of the relevant supporting documentation which has been submitted in support of the planning application. The principal documents that have subject to our review are the applicant’s Planning and Statement, prepared by Carter Jonas; the Retail Impact Assessment which has been prepared by FSP Retail Business Consultants; the supplementary information that was submitted by the applicant and received by GVA on

3 June 2015; and a further Supplementary Retail Impact Assessment prepared by Carter Jonas and received by GVA on 7 August 2015.

- 1.4 This report follows the submission of initial representations to CCDC, made on behalf of the partner authorities on 20 March 2015. This sought clarification on a number of matters associated with the applicant's town centre impact and sequential assessments.
- 1.5 This report sets out our findings following a thorough review of the applicant's methodology and a detailed sensitivity testing of the proposals in impact terms. This has been undertaken in accordance with the National Planning Policy Framework (NPPF), published in March 2012, and the National Planning Policy Guidance (NPPG), published in March 2014.
- 1.6 The findings of this report are intended to objectively inform the understanding of town centre impact matters associated with the proposed development and how the application should be determined by CCDC.
- 1.7 The remainder of this report is structured as follows:
 - Section 2 provides an overview of the planning policy context associated with the application, including the relevant development plan and evidence base documents for each of the respective authorities;
 - Section 3 provides an overview of the vitality and viability of the key centres within the respective partner authority areas.
 - Section 5 assesses the applicant's methodology in the context of GVA's approach to assessing town centre impacts;
 - Section 6 assesses the findings of the applicant's retail impact assessments against GVA's independent assessment of the proposal; and
 - Section 7 summarises the key findings and conclusions arising from our review, in order to objectively inform the approach that should be taken in determining the application.

2. Planning Policy Context

2.1 An overview of relevant national policy and guidance against which the proposal should be assessed is provided below. The development plan and planning policies for each of the partner authorities is also outlined in this section.

National Planning Policy

2.2 The National Planning Policy Framework (NPPF), published in March 2012, sets out the sequential and impact tests against which proposals for town centre uses including retail and leisure development in edge and out-of-centre locations should be assessed (NPPF, Section 2 – ‘Ensuring the vitality of town centres’).

2.3 In respect of sequential approach, Paragraph 24 of the NPPF requires that:

“Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.”

2.4 In respect of retail impact, Paragraph 26 of the NPPF requires that:

“When assessing applications for retail development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities 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). This should include assessment of:

- *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*
- *The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from*

the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made."

- 2.5 Paragraph 27 of the NPPF requires that where an application fails the sequential test or is likely to have a significant adverse impact on one or more of the above factors, it should be refused.
- 2.6 The National Planning Policy Guidance (NPPG) was published in March 2014 and is intended to complement and guide the interpretation of the policies set out in the NPPF. With respect to proposals for retail development, the NPPG replaces the hitherto retained PPS4 Practice Guidance in providing clarity on how sequential approach and impact should be assessed.
- 2.7 In terms of assessing impact, Paragraph 015 of the NPPG establishes the indicators that are relevant when forming a view on the overall health of town centres. The following should be considered:
- Diversity of uses
 - Proportion of vacant street level property
 - Commercial yields on non-domestic property
 - Customers' views and behaviour
 - Retailer representation and intentions to change representation
 - Commercial rents
 - Pedestrian flows
 - Accessibility
 - Perception of safety and occurrence of crime
 - State of town centre environmental quality
- 2.8 When applying the impact test, Paragraph 016 of the NPPG states the importance of considering the following:
- Scale of the proposals relative to town centres
 - The existing vitality and viability of town centres
 - Cumulative effects of recent developments
 - Whether local town centres are vulnerable
 - Likely effects of development on any town centre strategy

- Impact on any other planned investment
- 2.9 Paragraph 017 of the NPPG makes clear the need for a range of plausible scenarios to be considered when assessing the impact of a proposal on existing centres and facilities, which could require breaking the study area down into a series of zones to allow a finer-grain analysis of impact. In particular, the guidance states that the need to:
- “...set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues.”*
- 2.10 When forming a judgement as to whether the impacts arising from a proposal are significant, local circumstances must be considered. In this regard, the NPPG advises that:
- “...in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.”*
- 2.11 In addition to the above, the NPPG is also clear that where evidence demonstrates that there would be no likely significant impact on a town centre from an edge or out of centre proposal, the determining planning authority must consider all other material considerations when coming to a decision on the application.

Local Planning Policy

- 2.12 The development plan documents and relevant planning policies for each of the partner authorities is summarised below.
- Walsall Metropolitan Borough Council*
- 2.13 The development plan for Walsall is comprised of the Black Country Joint Core Strategy (BCJCS), adopted in February 2011, and the “saved policies” of the Walsall Unitary Development Plan (UDP) which was adopted in March 2005.
- 2.14 The BCJCS sets out the spatial planning framework for development within Walsall and the other local authority areas making up the Black Country region in the period up to 2026. Walsall is defined as a ‘Strategic Centre’ within the BCJCS; this states that the Strategic Centres will:

“Provide the main focus for higher order sub-regional retail, offices, leisure, cultural and service activities, balanced by a network of Town, District and Local Centres, providing for town centre uses including meeting day-to-day shopping needs.”

- 2.15 Policy CEN2 of the BCJCS seeks to maximise regeneration in order to protect and ensure an appropriate distribution of investment within the defined centres including Walsall. The need for all Strategic Centres, including Walsall, to secure an appropriate share of comparison and convenience retail development is set out in Policy CEN3. The policy recognises that securing such development will be necessary in order to ensure that investment to regenerate the Black Country is not lost.
- 2.16 Table 14 of the Policy CEN3 identifies a requirement, based on capacity forecasts at the time of the BCJCS being adopted, of 60,000 m² additional comparison goods retailing to be provided in Walsall by 2021.
- 2.17 The UDP reflects the stance of the BCJCS in seeking to protect and enhance the role of all defined centres within the Borough’s retail hierarchy. In particular, Saved Policy S2 states that Walsall town centre will be sustained and enhanced in its sub-regional role as the main centre for the Borough for comparison shopping. In supporting this position, Saved Policy WA10 supports the development of major comparison goods retailing at Lower Hall Lane, Digbeth and Old Square which will be necessary to meet the requirements of retailers who are not currently represented in the town centre, as well as existing retailers with requirements for more suitable accommodation.

Wolverhampton City Council

- 2.18 The development plan for Wolverhampton is also comprised of the BCJCS, in addition to the “saved policies” of the Wolverhampton UDP, adopted in June 2006.
- 2.19 As with Walsall, Wolverhampton is identified as a Strategic Centre within the BCJCS. Accordingly, Policies CEN2 and CEN3 apply in the context of securing an appropriate share of convenience and comparison goods retailing within Wolverhampton City Centre to ensure the wider regeneration of the Black Country can be achieved.
- 2.20 Table 14 of Policy CEN3 identifies a requirement, based on capacity forecasts at the time of the BCJCS being adopted, of 70,000 m² of additional comparison goods retailing to be provided within Wolverhampton City Centre by 2021.

- 2.21 UDP policies relating to the maintaining and enhancing of Wolverhampton City Centre as a destination for shopping and other activities have been superseded by the aforementioned policies of the BCJCS. Notwithstanding this, the BCJCS maintains the focus on Wolverhampton City Centre as a focus for investment in order to enhance its role as a shopping, commercial and leisure destination.
- 2.22 The Council has just completed consultation on the Publication version of the Wolverhampton City Centre Area Action Plan 2015 – 2026. The AAP, once adopted, will guide the regeneration of the city centre up to 2026. As part of its vision, the AAP seeks to prioritise the consolidation and reconfiguration of the existing retail core which includes the Mander and Wulfrun centres, Dudley Street, Victoria Street and the wider Southside area. This is set out in detail within Policy CA1 of the AAP.
- 2.23 The vision set out in the AAP recognises the identified requirement for 35,000 m² gross Class A1 comparisons goods floorspace to be delivered in the city centre up to 2026. Policy CC1 seeks to meet identified shopping needs by encouraging the presence of more independents, high quality branded retailers and other specialist shops.

Lichfield District Council

- 2.24 The development plan for Lichfield is principally comprised of the Local Plan Strategy 2008 – 2029, which was adopted in February 2015.
- 2.25 Core Policy 1 of the Local Plan establishes the spatial strategy for the District. In this context, the policy seeks to focus new and improved retail development within the commercial centres of Lichfield and Burntwood. The role of Lichfield City will be protected and strengthened as the Strategic Centre within the District, whilst Burntwood town centre will be enlarged in order to meet local retail needs.
- 2.26 The Local Plan identifies a requirement for up to 36,000 m² and 14,000 m² of the additional comparison goods retail floorspace to be developed within Lichfield city centre and Burntwood town centre respectively during the plan period.

Stafford Borough Council

- 2.27 The development plan for Stafford is currently comprised of the Plan for Stafford Borough which was adopted in June 2014. In replacing the former Stafford Borough Local Plan 2001, the Plan for Stafford Borough forms one half of the new development plan; the

Council is currently preparing a Site Allocations document which will form the second component and is expected to be consulted on in June/July 2015.

- 2.28 The Plan for Stafford Borough sets out the strategic planning framework for development in the Borough in the period up to 2031. A core element of the strategy seeks to achieve:

“...major town centre investments and exceptional levels of accessible community services and facilities.”

- 2.29 Paragraph 5.2 of the Plan establishes a number of key objectives for the Borough. Objective 8 is of relevance and seeks to deliver major new mixed use town centre retail schemes to make Stafford a significant sub-regional centre for retailing, leisure and cultural attractions.

- 2.30 Policy Stafford 1(i) expands upon the above by encouraging the development and expansion of Stafford town centre to provide 14,000 m² net additional comparison goods retail floorspace, in addition to increased convenience goods retail provision. Part (iv) of the policy places particular emphasis on strengthening the retail and service function of the defined primary retail core and shopping area, whilst protecting and enhancing its distinctiveness, vitality and viability.

3. Town Centre Health

- 3.1 This section provides an up-to-date overview on the vitality and viability of the key centres within the respective partner authority areas which are relevant to the assessment of impacts associated with the application proposal.

Walsall

- 3.2 As the Strategic Centre within the Borough, Walsall is the principal focus for comparison goods retailing. The town centre is anchored by three shopping centres (Old Square, Park Place, and Saddlers) and supports a large number of retail, service and leisure uses.
- 3.3 The centre offers a large department store (Debenhams), in addition to a number of national multiples which include BHS, Wallis, Burton, Dorothy Perkins, and New Look. In addition, there are a number of independent retailers represented within Walsall town centre whose respective offers are focused in the clothing and footwear sector.
- 3.4 The primary shopping area of the town centre includes a number of retailers whose fascias are also represented within outlet shopping centres. These include Marks and Spencer, Claire's Accessories, Clarks, The Works, Sports Direct, The Body Shop, Holland and Barrett, Thorntons, The Perfume Shop, and Blue Inc.
- 3.5 The Black Country Centres Study (BCCS) 2009 identified that of the total retail and service use floorspace within Walsall town centre at 2009 (129,191 m²), 14,976 m² was vacant. Latest data provided by Experian Goad confirms the proportion of vacant floorspace within the centre has increased to 18,143 m² (September 2009). This represents an increase of 21.1% which is significant when compared with the increase in total retail and service use floorspace in Walsall town centre since 2009 of just 1.9%. Whilst vacant units are spread throughout the primary shopping area, there are notable concentrations within Digbeth and Old Square.
- 3.6 The total number of vacant units within Walsall town centre is 143, which equates to a vacancy rate of 29.8%. This is very high when compared with the national average of 12.4%. In retail expenditure terms, this reflects the decline of Walsall's market share in the face of competing centres and facilities since 2004, as identified in the BCCS.

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- 3.7 Walsall town centre currently achieves an average prime shopping rent of £70 per sq ft – a significant decline of 44% on the pre-recession (2009) peak of £125 per sq ft (Property Market Analysis 2015). Whilst falls in rental levels have occurred nationally and principally as a result of the recession, the UK average decline of 28.7% means that Walsall has experienced a greater decline in relative terms. This has been compounded by relatively little market activity in Walsall since 2013, with weak retailer demand and few national multiples taking space. Falls in rental levels are reportedly greatest for retail floorspace in Park Street.
- 3.8 The emerging redevelopment of the Old Square Shopping Centre in Walsall town centre will see the opening of a Primark store, occupying one of five new retail units. Thus far, no other pre-lets have been confirmed. Further committed development (St Matthew's Quarter) is expected to deliver 3,178 m² of comparison goods net sales floorspace. Whilst this would improve the centre by providing new accommodation which is suitable for meeting modern retailer needs, it will not be of a scale to significantly increase Walsall's market share of comparison goods retailing.
- 3.9 The general environmental quality of the town centre is varied; whilst improvements have been made to the public realm which include the pedestrianisation of some streets, parts of the centre are characterised by poorer quality premises whose tired appearance renders a need for further investment. This has been exacerbated by high vacancy levels which have contributed to a decline in the overall quality of the town centre.
- 3.10 In view of the above, it is considered that the health of Walsall town centre is fragile and susceptible to further decline as market share is lost to other higher order centres and out of centre retail facilities.

Wolverhampton

- 3.11 Wolverhampton represents the largest of the Strategic Centres within the Black Country. Accordingly, it offers a significant number of comparison and other retailers within its primary shopping area, in addition to a range of leisure and service uses. Its market share of comparison goods retail expenditure had marginally increased between 2004 and 2009, based on the findings of the household survey which informed the BCCS and the Wolverhampton City Centre Retail Update Study 2014.

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- 3.12 There are a large number of national multiples that are present within the primary shopping area of the city centre; these include House of Fraser, Marks and Spencer, Next, River Island, Clarks, Wallis, Topman and Topshop. The majority of retailers are concentrated within the extensive Mander and Wulfrun shopping centres. The former is to be remodelled and upgraded to include a Debenhams department store which will occupy 8,360 m² of the floorspace. Based on the latest EGi data, retailing in Wolverhampton city centre is principally represented by mid-market and lower-end retailers, with a small number of requirements from retail operators falling within these market sectors.
- 3.13 The BCCS identified that the total floorspace for retail and service uses was 167,578 m² in 2009, of which 20,216 m² was vacant. The latest data provided by Experian Goad (September 2014) confirms the quantum of total floorspace for retail and service uses has increased to 173,366 m². The quantum of vacant floorspace has also increased to 35,600 m² in total.
- 3.14 Based on the latest information available, there are 160 vacant units within Wolverhampton city centre, representing a vacancy rate of 25.1% - double the national average. It is clear that the shopping centre owners in Wolverhampton are re-evaluating their portfolio and actively pursuing measures to increase the number and quality of retail occupiers. This includes the comprehensive reconfiguration of floorspace and upgrading of the building fabric in order to improve footfall and more effectively meet modern retailer requirements. The securing of Debenhams as an anchor tenant for the new Mander Centre is seen as a major catalyst for increasing footfall and attracting new retailers to the city centre.
- 3.15 The average Zone A shopping rent currently being achieved in Wolverhampton city centre is £80 per sq ft. This represents a reduction of some 42.9% on the pre-recession (2009) peak of £140 per sq ft (Property Market Analysis, 2015). This represents a greater decline than the average experienced for centres across the UK, at 28.7%, with weaker prime rental growth than the average for other sub regional centres.
- 3.16 There has been some recent take-up of floorspace by national multiples, including retailers such as Pandora and Deichman opening new stores within the Wulfrun and Mander centres respectively, indicating some early signs of improvement in the market.
- 3.17 The general environmental quality of the primary shopping areas within Wolverhampton city centre is considered good; the 2014 Retail Update Study acknowledges the public
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realm improvements that have been made around Queen Street, Princess Street and Broad Street / Victoria Street, which complement a series of well-maintained public spaces and squares.

- 3.18 In essence, our updated findings generally serve to corroborate the conclusions reached in the 2014 Retail Update Study that the performance of the city centre is mixed, albeit there are positive signs, including planned investment, to ensure that it continues to maintain its market share in the face of competing centres and other facilities within the region.

Stafford

- 3.19 Stafford is a Sub-Regional Centre whose primary shopping area is focused upon Greengate Street, Market Square, Goalgate Street and the Guildhall Shopping Centre. The town centre is considered to have a good mix of retailers, including a number of independents amongst a strong representation of national multiples. In terms of comparison goods retailing, the town centre offer is principally geared towards mid-market shoppers, although some lower-end retailers are present.
- 3.20 Relative to its size, the town centre boasts a varied clothing and footwear offer. This is reflected in the range of retailers that are represented in the centre, including national multiples such as Blacks, Edinburgh Woollen Mill, Evans, Monsoon, River Island, Topshop and Topman, and Wallis. The town centre's comparison goods retail offer is also complemented by a large Marks and Spencer store at Goalgate Street. It should be noted, however, that there is no other department store representation within the town centre, following the recent closure of the Co-op department store on Goalgate Street.
- 3.21 The 2013 Stafford Retail Capacity Update identified a total floorspace for retail and services uses in Stafford town centre of 109,340 m², of which 14,605 m² was vacant as of March 2013. The latest data provided by Experian Goad (August 2014) indicates that the total retail and service use floorspace in the town centre is 105,129 m², of which 9,912 m² is vacant.
- 3.22 The latest data provided by Experian Goad confirms that there are 46 vacant units in Stafford town centre; this represents a vacancy rate of 13.3%, which is slightly above the national average of 12.4%. Overall, the latest position indicates that there has been a marginal improvement on 2013 vacancy levels.

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- 3.23 The estimated prime shopping rents being achieved in Stafford town centre are £70 per sq ft Zone A (Property Market Analysis, 2015). This represents a decline on mid-2014 rental levels, and a reduction of some 30% on the pre-recession level of £100 per sq ft Zone A. This decline is broadly in line with the national average of 28.7%. There are currently a small number of retailer requirements for the town centre, which is in line with the general level of demand expected for a town of its size and status. There is also known interest from department store group Debenhams, although its requirements are yet to be met in accordance with its timescales. The planned Riverside development is expected to deliver around 18 additional retail outlets and it is understood that prelets to Marks and Spencer and Primark have been secured.
- 3.24 The environmental quality of the town centre is considered good, with well-maintained buildings and a higher quality public realm that reinforces the distinctive character and attractiveness of Stafford, reinforcing its appeal for visitors.
- 3.25 Overall, the current health of Stafford town centre is considered stable notwithstanding an increase in retail and service unit vacancies since the recession. A mixture of good quality mid-market retailers, including national multiples and independents, helps to underpin the vitality and viability of the town centre, though it continues to lack the anchoring role of a large department store to help drive footfall. The town centre does, however, remain susceptible to competition from out-of-centre retail facilities and the more extensive retail offers of higher order centres such as Birmingham and Wolverhampton.

Lichfield

- 3.26 Lichfield maintains its position as the strategic centre for the District and offers a comprehensive range of shopping and leisure facilities. Retail provision within the city centre is primarily concentrated around Bore Street, Market Street and Market Square, and within the Three Spires Centre off Baker Lane. A range of comparison goods retailers are represented within the primary shopping area of the city centre, which includes a mix of national multiples and some independents.
- 3.27 Whilst the city centre includes lower-end retailers such as New Look and Dorothy Perkins, there is a reasonable mid-market offer, primary focused on clothing and footwear, which includes brands such as Viyella, CC and Fat Face, in addition to other retailers such as Buxton and Bonnet and Roman Originals. The city centre also benefits from a Debenhams

department store which anchors the Three Spires shopping centre. The number of comparison goods retailers within the city centre is broadly in line with the national average, although representation by national multiples is lower than that for other comparable centres.

- 3.28 The Council's Update of Retail Evidence Base (Jan 2012) identified that the proportion of retail and service use units within the city centre had declined marginally between 2007 and 2011, from 292 to 290, whilst the number of vacant units had increased from 14 to 21 during this period. The latest data provided by Experian Goad (April 2015) confirms that the total floorspace for retail and service uses within Lichfield city centre is 66,584 m², of which 6,559 m² is currently vacant.
- 3.29 The total number of retail and service use units has increased marginally to 293 since 2011, of which 30 units are currently vacant. The latter's increase on 2011 levels has resulted from a decline in service uses within the city centre, with the number of comparison goods outlets remaining broadly consistent. In relative terms, the vacancy rate for Lichfield city centre is 10.1%, which compares favourably with the national average of 12.45 (Experian Goad, 2015).
- 3.30 In terms of prime shopping rents, Lichfield city centre is currently achieving £80 per sq ft Zone A. Rental levels have significantly increased since mid-2014 and, whilst they remain 15.8% below the pre-recession level of £95 per sq ft Zone A, it is evident that Lichfield's performance is better than that of other strategic centres in the region and indeed nationally. It should also be noted that interest from prospective retailers is relatively high given Lichfield's size and status.
- 3.31 The general environment of Lichfield city centre, in particular the primary shopping area, continues to be good. This includes a good quality public realm with attractive and clean streets whose aesthetic appeal has been boosted in previous years by a programme of environmental improvements. Buildings are generally well maintained with few that are in notable disrepair or in need of major refurbishment. These factors are conducive to Lichfield being a popular destination for shoppers and visitors, which is evident in the good levels of footfall generally achieved within the primary shopping area.
- 3.32 Overall, the health of Lichfield city centre is considered good; a position that remains unchanged since the centre was assessed as part of the Update of Retail Evidence Base in 2011. Notwithstanding this, there is scope to improve upon its comparison goods offer

and this could be achieved through the planned redevelopment of Friarsgate. This would help to meet modern retailer requirements and would increase the propensity for Lichfield to attract a greater range of national multiples. Growing its comparison goods retail offer through the delivery of the Friarsgate scheme will be imperative in order to reduce expenditure leakage to higher order centres such as Birmingham, Sutton Coldfield and Tamworth.

4. Methodology

- 4.1 This section sets out our review of the methodology adopted by the applicants in preparing their Retail Impact Assessments; this includes the supplementary addendum note was subsequently prepared and issued in June 2015 and the supplementary Retail Impact Assessment prepared in August 2015.

Catchment Area

- 4.2 Within their original assessment, the applicant defined the catchment area for MGDOV on the basis of primary, secondary and tertiary segments; it was assumed that these would account for 50%, 25% and 15% of trade draw respectively (MGDOV Retail Impact Assessment, p.27). The applicant acknowledged that the extent of the MGDOV catchment would be constrained beyond the collective segments due to a combination of relative remoteness and the competition posed by established outlet centres including Bicester Village, Cheshire Oaks, Gloucester Quays and East Midlands.
- 4.3 As observed within our initial representations to CCDC, the applicant has referred to a 30-minute drive time catchment and maintained this position within their latest assessment. Within the applicant's first supplementary report, it states that 71% of MGDOV shoppers will be drawn from within this area (Planning & Retail Statement, paragraph 3.14).
- 4.4 The first supplementary report reiterates the assumption that 75% of MGDOV shoppers will be drawn from within the Primary and Secondary segments of the applicant's defined catchment area.
- 4.5 However, reference is made to the proposed MGDOV drawing just 53% of its turnover from within a 30-minute drive time catchment (Paragraph 3.14). This is subsequently reported as 54% in the table that sits at the foot of paragraph 3.21. This contradicts the statement set out in p.27 of the applicant's Retail Impact Assessment which states that:
- "...Approximately 75% of resident based shoppers and turnover at MGDOV will be attracted from within the combined Primary and Secondary segments."*
- 4.6 Notwithstanding the above, it should be noted that the 30-minute drive time as identified on the applicant's revised OS plan of the catchment area (Appendix 4), extends beyond

the primary and secondary segments in a number of instances, in particular the area to the south of Wolverhampton. It is difficult to understand why there is a fundamental contradiction in defining the area from which the majority of trade to MGDOV would be drawn. Moreover, the supplementary report arouses further confusion by stating in Paragraph 3.21 that:

“The 30 minute zone is estimated to generate 54% of turnover and 53% of footfall but 71% of resident based shoppers.”

- 4.7 The above would imply that the 29% of shoppers who would visit MGDOV from beyond the 30-minute catchment area would spend more per head than the 71% whose spend would allegedly account for just 53% or 54% of MGDOV’s total turnover. This does not appear to have been explained within the applicant’s assessment or indeed their supplementary assessments.
- 4.8 There are also differences in how the catchment area has been drawn within the applicant’s assessments. The full extent of the applicant’s defined primary and secondary catchment areas for MGDOV is shown on the OS-based catchment plan which forms Appendix 4 of their first supplementary report.
- 4.9 Paragraph 3.17 of the first supplementary report states that a weighted approach has been used, as opposed to drive time bands, to present the catchment area for MGDOV. Whilst it is appropriate to define a catchment area having regard to the location and accessibility of competing centres and other retail facilities, it is unclear as to what factors have informed the applicant’s view that MGDOV will have greater shopper penetration in some postcode sectors over others.
- 4.10 The above is perhaps best exemplified by the way in which a separate primary catchment has been identified for an area to the south of Birmingham city centre. This encompasses a combination of the B15, B16 and B12 postcodes. The majority of the area covered by the B15 postcode comprises the Calthorpe Estate, one of the UK’s wealthiest residential districts. This contrasts markedly with the high levels of economic and social deprivation that exist in the B12 postcode, which principally covers the Balsall Heath district of Birmingham.
- 4.11 There is no rationale presented within the applicant’s assessment to explain why a designer outlet shopping facility would have the same level of market penetration in each

of the above areas despite their economic disparity, or indeed why affluent residents of the B15 postcode would be any more inclined to visit MGDOV over a full price centre, than residents residing in the nearby B13 postcode – a prosperous area which is defined within the applicant's secondary catchment area.

- 4.12 The applicant's latest assessment adopts a more conventional approach to defining the primary and secondary catchment area, with both being defined by zones comprising postcode sectors. Indeed, the secondary catchment area does not extend into Birmingham as was previously the case in the first supplementary assessment. There is no explanation provided as to why the extent of the defined catchment area has changed within the latest assessment.
- 4.13 There is further inconsistency between the applicant's previous and latest assessments in terms of defining the proportion of turnover which will be drawn to the proposal from within the primary and secondary catchment areas. The latest assessment (paragraph 2.62) states the 45% of the proposal's turnover will be drawn from outside the defined catchment area. The applicant does not explain their latest assumption that the proposal will draw 55% of its turnover from within the defined primary and secondary catchment area when this was previously reported as 75% (see paragraph 4.5 above).
- 4.14 In undertaking an independent assessment of the applicant's proposal, we have defined a study area from which it is estimated that 70% of the total retail turnover for MGDOV would be drawn (see Appendix 1). This is not too dissimilar to parts of the applicant's catchment area as defined upon the primary and secondary segments within the applicant's subsequent assessment.
- 4.15 However, we consider that the extent of the applicant's primary and secondary catchment as drawn does not take into account the competition that will be posed by the designer outlet offer at Resorts World. This is likely to constrain the extent of the MGDOV catchment to the south and east, with residents in Tamworth, Coleshill and the central and southern areas of Birmingham being within relative easy reach of Resorts World. The propensity for Resorts World to attract trade from these areas and beyond will be significantly enhanced by its proximity to the national motorway network, its wider leisure offer (which will not feature at MGDOV) and its high profile location alongside the NEC.

4.16 In defining the catchment area from which the majority of trade will be drawn, it is also important to have regard to the trade draw patterns of established and similar sized outlet centres. In many instances, household survey data confirms that the majority of trade drawn to an outlet centre comes from within a relatively short distance. An example of this is the York Designer Outlet, which draws 23% of its trade from within York itself (31% for clothing and footwear), and 63% within a 15-mile radius (York Retail Study Update 2014, Appendix 3).

4.17 Our study area, from which we estimate 70% of trade will be drawn (representing a combined primary and secondary catchment), incorporates the nearest towns and cities to the proposal, namely Cannock, Lichfield, Stafford, Walsall and Wolverhampton. We exclude the urbanised areas further south, including the majority of Birmingham, and those areas further to the east e.g. Coleshill, Solihull and Tamworth, given their greater distance from MGDOV and proximity and good level of accessibility to Resorts World. Trade drawn from these areas to MGDOV is therefore expected to be much less and would account for a proportion of the 30% expected to be drawn from beyond the primary and secondary catchment area. The remainder is expected to comprise trade from the remoter localities principally surrounding the West Midlands to the north and west, though the extent of this will be constrained by the catchments of competing facilities including Cheshire Oaks.

4.18 Our defined study area is comprised of 25 zones, based on postcode sectors, and enables all available household survey data to be utilised in calculating the turnover of shopping facilities within the study area. Given the limited geographical area in which the applicant's household survey was conducted, we have utilised the most up-to-date household survey data available to cover the remainder of the study area which accords with the zones used. For clarity, the source of data for each zone is set out below:

- Zones 1 – 9 accords with the same zones for which household survey data was obtained by the applicant in preparing their Retail Impact Assessment (NEMS, 2014).
- Zones 10 – 22 accord with 13 zones which form part of the study area to the BCCS for which household survey data was obtained (NEMS, 2009). These are as follows:

BCCS	50	30	31	36	37	42	43	46	47	49	51	53	32
MGDOV	10	11	12	13	14	15	16	17	18	19	20	21	22

- Zones 23, 24 and 25 accord with Zones 5, 6 and 7 respectively of the study area informing the Stafford Retail Capacity Update, for which household survey data was obtained (NEMS, 2010).

4.19 The above has enabled us to build up a comprehensive picture of shopping patterns within the study area in order to estimate the turnover of defined centres and other retail facilities. Our findings in relation to existing shopping patterns in the study area are examined in further detail later within Section 5 of this report.

Base and Design Years

4.20 The applicant has assumed a base year of 2014 and a design year of 2019 (this approach has been retained in their latest assessment) although impacts arising from the proposal have also been tested at 2022 (previous assessment) and up to 2024 in the latest assessment. We consider that trading patterns would become established well in advance of 2022 if the scheme was to receive planning permission in 2015 and be implemented in 2016. For this reason, our assessment assumes an appropriate design year of 2020 (and updated base year of 2015), against which the impacts of the proposal are assessed.

Population

4.21 Within Paragraph 8.22 of their first Planning and Retail Statement, the applicant identified the total population of the defined catchment area for MGDOV, however, the source of this data was not provided and it was not clear as to whether population growth had been factored in between the base and design years.

4.22 The applicant has since revisited this issue and has now provided baseline and forecast population data for each of the catchment area zones sourced from Experian Business Strategies (Supplementary Retail Impact Assessment, Appendix 2, Table 1). We concur with this latest approach.

4.23 Similarly, our assessment of the proposal provides up-to-date population figures for of the study area zones adopted. This information has been obtained from Experian Business Strategies, utilising the latest ONS forecasts. Table 1 of our financial analysis (see Appendix

2) provides a breakdown of the study area population for each individual zone, at our selected base and design years.

Expenditure

4.24 The applicant's approach to calculating available expenditure for comparison goods shopping within the catchment area has changed within the latest assessment. Within their previous assessment, the applicant had obtained per capita expenditure estimates from the Consumer Expenditure Survey (CES) in order calculate the total comparison goods turnover of retail facilities within the catchment area (Planning & Retail Statement, paragraph 8.32). It is understood that the applicant had applied this data to the market shares of existing retail facilities, which were in turn derived from a blend of data obtained from the applicant's household survey and the NSLSP.

4.25 Within our initial representations, we identified a lack of clarity within the applicant's assessment as to whether growth rates had been applied to expenditure between the base and design years. This is important to ensure that the impacts on relevant centres are correctly tested at the design year. In response to this matter, the applicant's first supplementary report simply stated at paragraph 4.38 that:

"...All of the analyses are undertaken in 2014 prices without artificially inflating the turnover of centres to allow for growth in expenditure..."

4.26 It is important to be clear that making an allowance for expenditure growth is not to artificially inflate the turnover of facilities; this is fundamental in understanding the true level of impact on the turnover of existing retail facilities at the design year. The applicant's earlier response was somewhat confusing as it implied that the turnover of existing facilities at their design year of 2022 remains the same as that at 2014.

4.27 There was further confusion in terms of the price base used; the first supplementary report referred to the expenditure being in 2014 prices (Paragraph 4.38), however, the applicant's Retail Impact Assessment (p.159) and indeed the Planning & Retail Statement (paragraph 8.21) stated that the expenditure was in 2013 prices. Using a consistent price base is imperative in order to ensure that the effects of inflation are correctly stripped out.

4.28 Within their latest assessment, the applicant has sought to address this issue by using per capita expenditure for each of the catchment area zones sourced from Experian in a

2013 price base and grown to the design year using appropriate forecasts set out in Experian Retail Planner Briefing Note 12.1. Appropriate deductions for Special Forms of Trading (SFT) have also now been made. Experian is a robust and widely recognised source of population and expenditure data, and is indeed widely used by GVA.

- 4.29 Whilst there are clear differences in the total comparison goods expenditure that has been calculated within the applicant's original and latest assessments (which can be attributed to the different data sources used), a breakdown of per capita expenditure has not been presented within any of the applicant's assessments. This is despite the comment made at Paragraph 8.36 of the applicant's Planning and Retail Statement that the calculation of available expenditure was based on broad merchandise categories.
- 4.30 Having examined the applicant's latest assessment, it is noted that the total per capita expenditure figure for each zone (provided by Experian) has been applied in calculating total available expenditure. The issue with this is that the applicant has included DIY spend without correctly allocating it to relevant retail facilities (this being because their commissioned household survey did not ask respondents on their DIY shopping destinations).
- 4.31 Furthermore, there is no evidence within the applicant's latest assessment to indicate that they have calculated the total expenditure for each goods category (e.g. clothing and footwear) and applied the respective market shares identified from the household survey in order to obtain more accurate turnover figures for defined centres and other retail facilities. Rather, the turnover of retail facilities appears to have been calculated by multiplying the total comparison goods expenditure for each zone (including spend on DIY goods) by an average market share for each shopping destination (Supplementary Retail Impact Assessment, Appendix 4, Tables 1-4).
- 4.32 The effect of the applicant's approach is a likely over-estimation of comparison goods turnover for a number of defined centres (e.g. Walsall town centre) at the base and design years. The ramification of this is that over-inflated turnovers will disguise the true level of impact resulting from trade diversions to the MGDOV.
- 4.33 Our assessment of the applicant's proposal utilises per capita expenditure data which has been obtained from Experian Business Strategies in 2013 prices. A breakdown of per capita expenditure for broad categories of comparison goods within each zone of the study area has been provided (Appendix 2, Tables 2a, 2b, 2c & 2d) at the base year

(2015) and design year (2020). Expenditure growth has been applied using the central case forecasts provided by Experian Retail Planner Briefing Note 12.1, and deductions made for special forms of trading (SFT) in accordance with the adjusted rates provided by Experian.

4.34 Our assessment identifies that the total comparison goods expenditure available within the study area (excluding spend on DIY and garden goods) is expected to rise from £2,101.08m at 2015 to £2,385.59m at 2020, representing an increase of £284.51m. Just over 32% of this increase (£92.05m) is expected to account for spend on clothing and footwear goods.

4.35 In order to align per capita expenditure for different goods categories with the household survey data obtained for the study area, we have calculated available spend for each of the following:

- Clothing and footwear;
- Furniture, floor coverings and soft furnishings;
- Electrical goods; and
- Personal and other goods.

4.36 The personal and other goods category includes health and beauty, recreational, toys, books, jewellery and homewares goods, thus representing an average per capita spend per zone of the study area. The resultant expenditure is then applied to an average market share derived from the relevant household survey data.

Turnover of Proposal

4.37 There are substantial differences in the turnover figures that have been arrived at for the proposal within the applicant's original and latest retail impact assessments. Previously, the applicant had advised that the total retail turnover of MGDOV would be £82.6m (Planning & Retail Statement, paragraph 8.34). This would be comprised of the following categories:

- Clothing and footwear - £58.1m;
- Personal goods - £5.9m;
- Household goods - £9.9m; and
- Leisure goods - £8.7m.

- 4.38 The applicant's latest assessment identifies a total comparison goods turnover of £105.3m at 2019, representing an increase of more than 27% on their earlier estimation. The latter can be attributed to the use of a more appropriate sale density for designer outlet centres, rendering that previously adopted by the applicant as artificially low and unrealistic.
- 4.39 Notwithstanding the use of a higher sales density, we consider that the applicant's estimated turnover for MGDOV is still too low. The applicant demonstrates how the retail turnover for MGDOV has been calculated in Table 1, Appendix 6, of their latest assessment. However, the gross floorspace figure used does not match that which is set out on the planning application form. The latter states that the gross floorspace of the proposal for Class A1 use will be 25,242 m². Class A3 uses at MGDOV form a separate component amounting to 1,762 m² as stipulated on the planning application form.
- 4.40 Accordingly, applying the applicant's assumption that 75% of the gross Class A1 floorspace will comprise net sales area, the resultant figure upon which retail turnover should be calculated is 18,932 m². The applicant should not therefore make a further deduction for Class A3 uses since this has already been allowed for.
- 4.41 We are aware that the average sales density being achieved across McArthurGlen's outlet centre portfolio is £5,600/m² (at 2014). This is considered to be realistic and broadly in line with the baseline position now adopted by the applicant (sitting within a range of £2,700/m² and £12,000/m² which is currently being achieved for outlet centres across the UK).
- 4.42 However, for the purposes of robustness our approach assumes that the sales densities of comparison goods retailers at MGDOV will increase in line with the forecast rates identified in Experian Retail Planner Briefing Note 12.1. It should be noted that it was acknowledged within the applicant's first supplementary report (paragraph 4.38) that no allowance had been made for improvements in trading efficiency; the latest assessment does allow for some growth between the base and design years although this is low and not in accordance with the latest Experian forecasts.
- 4.43 Our approach assumes that the sales densities of comparison retailers at MGDOV will increase in line with the forecast rates identified in Experian Retail Planner Briefing Note 12.1. With an allowance for trading efficiency growth being made, we calculate that

MGDOV would achieve a sales density of £6,692/m² at 2020, equating to a total comparison goods turnover of £126.70m (Appendix 2, Table 6a). This is based on our view that MGDOV is likely to achieve a predominantly mid-scale retail offer.

Trade Draw of Proposal

- 4.44 The applicant continues to adopt an overly simplistic approach to trade draw and trade diversion within the latest supplementary retail impact assessment. This approach does not consider the proportion of MGDOV's comparison good turnover that would be drawn from each of the zones comprising the defined catchment area which is necessary in order to produce a fine-grained assessment of trade diversion. This is explained as a key step within the NPPG and enables a more informed understanding of the extent to which the proposal is likely to divert turnover from existing retail facilities, having regard to current shopping patterns.

Commitments

- 4.45 The applicant's original Retail Impact Assessment set out a number of pipeline developments which had been identified within the wider West Midlands region and beyond to inform an analysis of cumulative impact. A key concern was that details of how these turnovers had been calculated and the assumed trade draw patterns for such developments were absent from both the applicant's original and first supplementary retail impact assessments.
- 4.46 We note the applicant's latest supplementary assessment reduces down the number of commitments and provides greater detail on how their turnovers have been derived. However, the applicant does identify the trade draw patterns for these commitments within their analysis (Appendix 7, Table 1). Again, this approach does not allow for a fine-grained analysis of trade diversion on a zone-by-zone basis, which is a fundamental shortcoming of the applicant's assessment.
- 4.47 Our assessment examines the expected cumulative impacts of relevant commitments and MGDOV trading at 2020. Details of the floorspace and expected comparison goods turnover of each commitment are set out in Table 8a of our financial analysis, whilst the respective trade draw patterns are set out in Table 8b. This includes the following town centre investment schemes:

- Friarsgate, Lichfield;
- Mander Centre, Wolverhampton;
- Riverside, Stafford; and
- Old Square (Phases I, II & III) and St Matthew's Quarter, Walsall.

4.48 We have excluded commitments associated with convenience goods and DIY retailing, in addition to those whose expected trade draw is considered unlikely to influence shopping patterns within the defined study area. Our analysis utilises actual net sales floorspace data for each commitment where known (e.g. obtained from planning applications), or where this is unknown, estimates the relevant net sales area based on an appropriate gross to net floorspace ratio. Market shares of relevant retail facilities have also been adjusted at the base and design years to take into account the trading of the New Square scheme in West Bromwich.

5. Impact

- 5.1 This section sets out our critique of the applicant's original and subsequent impact analyses, and compares this with the approach and findings of our assessment (see Appendix 2).
- 5.2 It is noted that the applicant's latest retail impact assessment has dispensed with the gravity based shopping model which was previously used by their consultants FSP. Whilst there are indeed a number of approaches to assessing retail impacts, it is imperative that any such assessment is transparent and that its findings can be readily understood.
- 5.3 The applicant's latest supplementary retail impact assessment has adopted a more transparent approach insofar that the data sources which inform their assumptions are now presented. However, the absence of a fine-grained analysis of shopping patterns which would be achieved by identifying trade draw and diversions on a zone-by-zone basis means that the applicant's assumptions as to the extent to which relevant retail facilities will be impacted upon by MGDOV are unclear.
- 5.4 It should also be noted that the applicant has not undertaken a comprehensive household survey for their entire defined catchment area; only Zones 1 – 10 have been surveyed in this way and the applicant is reliant on more generic data provided by the NSLSP to fill in the gaps. Whilst the latter can be a useful tool in helping to define a suitable catchment area, it does not canvass shopping views and behaviour in the same way as a household survey. In particular, the applicant's use of the NSLSP in this context means that it is impossible to derive an accurate market share of clothing and footwear expenditure being captured by defined centres and other retail facilities within the catchment area.
- 5.5 In order to ensure a thorough and robust assessment of impacts arising from the proposal, we have comprehensively reviewed the shopping patterns within the defined study area using the most up-to-date household survey data available. This is considered a more robust approach than relying on the NSLSP for the reasons set out above.
- 5.6 Given that the applicant has only surveyed part of the catchment area for the proposal, additional zones have been added to create the defined study area for our assessment. As set out in Section 4 of this report, these zones are consistent with those used to inform the BCCS and Stafford Retail Capacity Update, thus enabling a more comprehensive

understanding of shopping patterns and the ability to reliably estimate the comparison goods turnover of retail facilities in the study area.

- 5.7 The above approach has enabled us to undertake a fine-grained analysis within each of the study area zones to identify the destinations from which the proposed development is likely to divert trade. This a proportionate and robust approach, given the quantum of floorspace proposed, which is in accordance with the NPPG.

Trading Profile

- 5.8 The applicant's assessment of retail impacts arising from the proposed development is predicated upon it trading as an 'upscale' outlet centre. In this context, the applicant considers that MGDOV will focus upon fashion retailing, with half of occupiers trading within the upscale price segment. Whilst the applicant's Planning and Retail Statement (paragraph 8.30) states that such occupiers will be in the 'Luxury', 'Premium' and 'Upper Middle' price points, this is contradicted by the their Retail Impact Assessment (p.3) which states that such occupiers will be "realistically Middle Upper rather than Luxury".
- 5.9 The applicant considers that MGDOV will attract a similar type of shopper to that of Cheshire Oaks and Gunwharf Quays e.g. those attracted to the 'Assured' and 'Classic' brand segments. Put simply, the applicant expects MGDOV to attract the type of shopper who is more likely to visit higher order centres such as Birmingham, rather than centres such as Walsall which tend to serve the lower middle / middle price family segments.
- 5.10 Having considered all of the available evidence, we do not consider that the proposed development will trade in the manner described by the applicant. The scheme would, if built, deliver a significant quantum of retail floorspace comprised of up to 140 shops (Retail Impact Assessment, p.23). Developing a scheme on this scale would require an extremely high level of need and occupier demand in the upscale price segment to enable it to trade in a similar manner to Cheshire Oaks and Gunwharf Quays.
- 5.11 By the applicant's own admission, there are strong concentrations of midscale and struggling families in the immediate vicinity of the proposed development (Retail Impact Assessment, p.37), whilst within a 30-minute drivetime of the proposed development it is acknowledged that there are significant numbers of 'Hard Pressed' families (Retail Impact Assessment, p.20) who are less likely to be designer outlet shoppers.

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- 5.12 The demographic issues identified are further compounded by the ACORN profile of shoppers living within the defined catchment of MGDOV; the applicant reports that there are 'below average' proportions of designer outlet shoppers (e.g. those in the 'Executive Wealth', 'Mature Money' and 'Steady Neighbourhoods' groups). Consequently, in order for MGDOV to perform as an upscale designer outlet centre, it will be necessary to attract shoppers from much further afield (e.g. those residing within the 30 to 60-minute drive time band identified) who are more likely to fit the lifestyle profile identified in the applicant's Retail Impact Assessment (p.20).
- 5.13 The propensity for the Resorts World scheme at Solihull to draw designer outlet shoppers must be given sufficient weight when considering how MGDOV is likely to trade. Resorts World will offer a comprehensive retail and leisure offer, which will include a cinema, casino and hotel, in addition to conferencing facilities. As identified earlier in this report, the location of the Resorts World scheme affords it an excellent profile and one which has the ability to draw designer outlet shoppers from areas with greater levels of prosperity; this includes Solihull, Lapworth, Royal Leamington Spa and Warwick.
- 5.14 With the above in mind, the validity of the applicant's claims that there is the capacity for an additional designer outlet shopping facility in the West Midlands must be called into question. Intelligence from within the outlet shopping industry would suggest that the opening of the Resorts World scheme will fulfil the West Midlands requirement. Speaking to Retail Week magazine in April 2013, the managing director of McArthurGlen (Northern Europe), Henrik Madsen, commented:
- "Is there space for more? Perhaps one in the Midlands and one in the South but the opportunities are constrained not only by consumer demand but by brand demand."*
- 5.15 More pertinently, the above appears to be reflected in the views of the applicant's own retail consultants, FSP, whose director, Kenneth Gunn, comments that:
- "There still looks to be an opportunity between the M3 and M23 and the affluent catchment of the South West corridor. Birmingham had been lacking provision but the NEC scheme [Resorts World] should cover that."* (Retail Week, 26 April 2013)
- 5.16 There has been no change in the composition or format of the Resorts World scheme since FSP's views were expressed in April 2013, which makes their somewhat contradictory stance in support of the proposed development highly questionable.
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- 5.17 Taking into account the prevailing demographics of the primary and secondary catchment area for the proposal, the opportunity for designer outlet shopping which is expected to be fulfilled by Resorts World, and the views of industry experts, it is considered imperative that the proposal is assessed on the basis that it is likely to trade as a midscale outlet centre.
- 5.18 Our assessment of impact focuses solely on comparison goods, as the applicant has confirmed that the proposed development will not trade convenience goods. In this regard, we do not include the turnover of convenience goods retailers within those centres where impacts have been assessed. This is because the inclusion of convenience goods turnover would serve to disguise the true level of impact that would be experienced by affected retailers.

Walsall

- 5.19 Based on the latest household survey data, the market penetration of Walsall town centre is strong within a number of the zones comprising the primary catchment area of the proposal. For example, in Zone 1 of the study area (the central zone for Cannock), Walsall attracts the greatest proportion of comparison goods expenditure after Cannock town centre (£17.97m at 2015). For Zone 3, which includes the southern periphery of Cannock and its immediate catchment area to the south, Walsall attracts the greatest proportion of comparison goods spend by some margin; this is estimated to be £92.43m at 2015 (36.6% of available spend in Zone 3), compared with just £21.14m (8.4%) for Cannock town centre (Appendix 2, Tables 4a and 4b).
- 5.20 In addition to the above, Walsall also draws significant levels of comparison goods expenditure from Zones 2 and 4 of the study area (£45.98m at 2015), both of which are readily accessible for Cannock with good transport links in the form of the A452, A5 and M6 Toll. It should also be acknowledged that, in respect of clothing and footwear goods, Walsall attracts almost 45% of available expenditure from within Zones 3 and 4, thus reinforcing its role as a principal shopping destination for these types of goods.
- 5.21 Given Walsall's substantial influence over shopping patterns within the primary catchment area of the proposal (from where the proposal is expected to draw a higher proportion of its turnover) there is a much greater propensity for it to compete for trade. This is compounded by the high level of clothing and footwear spend that Walsall currently

retains, this being the type of retailing which is expected to form the majority of the proposed development's comparison goods offer.

- 5.22 A midscale shopping outlet centre at Cannock, offering discounted quality clothing lines, can be expected to appeal to many price-conscious shoppers who reside in Walsall's catchment area and are purchasing clothing and footwear goods from the town centre's Family segment retailers.
- 5.23 That the proposed development will pose a significant degree of competition with Walsall cannot be under-estimated. We do not accept the view that the proposed outlet centre will only attract occasional visits from shoppers in the primary catchment area; the opportunity to buy discounted goods from midscale brands on a regular basis will appeal to many people whose household income is constrained. Indeed, the applicant's own demographic evidence substantiates this point.

Trade Diversion and Impact

- 5.24 It is expected that, of all the defined centres considered within the respective partner authority areas, the proposed development will divert the highest proportion of trade from Walsall town centre. It is estimated that there would be a trade diversion of £18.30m from Walsall to the proposed development at 2020, equating to a negative impact of 5.1%. This is summarised below:

Table 5.1: Trade Diversion and Solus Impact of MGDOV (Walsall)

Pre-MGDOV Turnover (2020)	Diversion to MGDOV	Residual Turnover (2020)	Impact
£358.32m	£18.30m	£340.02m	-5.1%

Source: Appendix 2, Tables 11 and 12

- 5.25 The above is significantly more than the applicant's latest assumption that the proposed development would divert just £5.3m from Walsall town centre (Supplementary Retail Impact Assessment, Appendix 8, Table 1). As established within this report, it is considered that the applicant has under-estimated the diversion of turnover to MGDOV which can be partly attributed to the absence of any detailed analysis of shopping patterns and their assumption that the proposal will trade as an upscale outlet centre, a scenario that we consider to be unrealistic.

- 5.26 Conversely, our estimated level of trade diversion takes into account the overlap in the comparison goods retail offer of Walsall town centre as a result of the proposed development trading in at a midscale level.
- 5.27 The significant diversion of comparison goods turnover from Walsall to the proposed development will be compounded by the cumulative impacts of a number of retail commitments which are currently planned or being implemented. We estimate that the committed Friarsgate scheme in Lichfield city centre would divert some £7.19m from Walsall town centre at 2020 (having regard to the overlap in shopping catchments within Zones 2, 4 and 5 of the study area) and the scale and mix of the retail offer.
- 5.28 Our assessment of cumulative impact estimates that there will be some diversion of trade from within Walsall town centre to the emerging Old Square scheme, and the St Mathew's Quarter redevelopment which is expected to come forward. We estimate that collectively, these developments would divert £16.41m of turnover from existing retailers in Walsall at 2020 (equating to almost 42% of their turnover). The cumulative impact on the turnover of existing town centre retailers with all commitments and the proposed development trading at 2020 is summarised below:

Table 5.2: Trade Diversion and Cumulative Impact of MGDOV & Commitments

Pre-MGDOV Turnover (2020)	Diversion to MGDOV & Commitments	Residual Turnover (2020)	Impact
£358.32m	£50.44m	£307.88m	-14.1%

Source: Appendix 2, Tables 11 and 13a

- 5.29 Whilst the trading of the Old Square and St Matthew's Quarter commitments would increase Walsall town centre's comparison goods turnover, the quantum of retail floorspace that would be delivered would not be of a scale which would enable Walsall to offset the impacts of competing developments elsewhere. Consequently, even if all of the town centre commitments were to be delivered, it is expected that Walsall would still suffer a decline in market share, principally resulting from the trading of the proposed development. The implications in terms of impact are shown below:

Table 5.3: Cumulative Impact with Uplift in Walsall Town Centre Turnover

Pre-MGDOV Turnover (2020)	Diversion to MGDOV & Commitments	Net Difference with TC Commitments	Residual Turnover (2020)	Impact
£358.32m	£50.44m	-£11.07m	£347.25m	-3.1%

Source: Appendix 2, Table 13b

- 5.30 Hence, the positive impact of additional turnover being added to Walsall town centre with the trading of its commitments would be lost by a higher proportion of turnover being diverted to the proposed development and other commitments elsewhere.
- 5.31 There will also be an indirect impact on other businesses within Walsall town centre, namely food and drink establishments, whose trade will be dependent to some degree on linked trips being made by town centre shoppers. Based on the applicant's own estimate, the turnover of the proposed development's food and drink (Class A3) offer would be in the region of £10.8m. If the proposed development was to draw the same proportion of its turnover for food and drink business as it is expected to do for comparison goods retailing (e.g. 14.4% from Walsall), this could result in a net loss of £1.56m from Walsall town centre.

Summary Position

- 5.32 As identified in Section 3 of this report, the health of Walsall town centre has declined in recent years and is now fragile. In this context, both the solus and cumulative impacts arising from the proposed development on Walsall town centre are considered to be **significant adverse**.
- 5.33 The level of trade diversion from Walsall town centre to the proposed development will be significant, whose effects will be felt more acutely by some struggling town centre retailers. With a further reduction in market share, Walsall town centre will retain less of the growth in comparison goods expenditure which is forecast within its catchment, to the detriment of town centre retailers.
- 5.34 The anticipated direct and indirect impacts on Walsall town centre may well result in the closure of shops and other businesses, including those traded by national multiples who will not wish to operate unprofitable stores. This will result in further increases to vacancy levels, reduced footfall, and will damage investor confidence. With a poorer trading

environment, it is likely that there will be a corresponding reduction in retailer demand within Walsall town centre, thus impacting upon the ability of developers to deliver future town centre schemes such as St Matthew's Quarter.

Wolverhampton

- 5.35 Wolverhampton city centre's influence on comparison goods shopping patterns is most notable within the south-western extent of the proposed development's primary and secondary catchment area, primarily focused upon Zone 9 of the study area. The household survey data identifies that the city centre is currently attracting 41.5% of available comparison goods spend in Zone 9 (£104.70m) (Appendix 2, Tables 4a and 4b). The proportion of clothing and footwear spend drawn from Zone 9 to Wolverhampton city centre is slightly less at 36%.
- 5.36 We estimate that the proposed development will draw a relatively high proportion of turnover from Zone 9, at 6% (equating to £7.60m at 2020). This reflects the proximity and relative good accessibility of the proposed development for shoppers residing in Zone 9, which has the highest population and corresponding spend for comparison goods after Zone 3 (see Appendix 2, Tables 1 and 3e).
- 5.37 There is less influence over the central area of Cannock and that immediately to the south (Zones 1 and 3), with Wolverhampton city centre attracting just 3% and 7.4% of available comparison goods spend respectively. As noted within the Walsall analysis above, Zones 1 and 3 are where higher proportions of turnover (amounting to £24.08m at 2020) are expected to be drawn by the proposed development.
- 5.38 The central, southern and western areas of Wolverhampton city centre's retail catchment area (principally focused upon zones 10, 15, 18, 19 and 20) are overlapped by the proposed development's secondary catchment area, and as such, the proportion of turnover that we expect to be drawn from each zone in this area will be less, ranging from 1% to 1.5% (see Appendix 2, Table 6b).
- 5.39 In view of the above, whilst there is an overlap in the catchment areas for Wolverhampton city centre and the proposed development, the market penetration of the former in those zones from where we expect the proposal to draw higher proportions of turnover is less than that identified for Walsall.

5.40 Notwithstanding the above, the scale of the proposed development means that there would be a degree of competition with Wolverhampton, having regard to the overlap in their respective comparison goods offers. Whilst on a larger scale than Walsall, Wolverhampton's clothing and footwear offer is also geared towards the Family segment, and this, as we have hitherto identified, is expected to feature within the retail offer of the proposed development.

Trade Diversion and Impact

5.41 Having assessed the shopping patterns identified by the household survey data for each of the zones within the Wolverhampton catchment area, we have been able to estimate the proportion of trade that would be diverted from the city centre's comparison goods retailers to the proposed development. It is expected that the proposed development will divert £14.73m of comparison goods turnover from Wolverhampton city centre, representing 11.6% of the proposal's turnover.

5.42 Almost 24% of the diverted turnover (£3.48m) at 2020 would account for spend by residents in Zone 9. The total estimated trade diversion from Wolverhampton city centre would equate to a negative impact of 2.7% at 2020. This is summarised below:

Table 5.4: Trade Diversion and Solus Impact of MGDOV (Wolverhampton)

Pre-MGDOV Turnover (2020)	Diversion to MGDOV	Residual Turnover (2020)	Impact
£545.19m	£14.73m	£530.46m	-2.7%

Source: Appendix 2, Tables 11 and 12

5.43 As with Walsall, the proportion of turnover that we expect to be diverted from Wolverhampton city centre's comparison goods retailers to the proposed development is substantially more than that identified by the applicant in their latest assessment - £4.0m (Supplementary Retail Impact Assessment, Appendix 8, Table 1). Again, this reflects the applicant's assumption that MGDOV will principally compete with upscale centres (e.g. Birmingham city centre).

5.44 In terms of commitments, we estimate that the net increase in retail floorspace at the Mander Centre in Wolverhampton city centre will result in a trade diversion of £11.44m at 2020. This represents 35% of the total turnover for the Mander Centre extension, which will

be primarily drawn by the new Debenhams store. Having regard to the shopping patterns within Wolverhampton's catchment area, we expect only a negligible proportion of turnover to be diverted to other commitments, with the Old Square and St Matthew's Quarter schemes in Walsall drawing the most with an estimated £3.51m at 2020. The latter will result from the retention of some expenditure which is currently leaking from Walsall's western catchment area.

- 5.45 The cumulative impact on the turnover of existing city centre comparison goods retailers with all relevant commitments and the proposed development trading at 2020 is summarised below:

Table 5.5: Trade Diversion and Cumulative Impact of MGDOV & Commitments

Pre-MGDOV Turnover (2020)	Diversion to MGDOV & Commitments	Residual Turnover (2020)	Impact
£545.19m	£35.99m	£509.20m	-6.6%

Source: Appendix 2, Tables 11 and 13a

- 5.46 The investment at the Mander Centre has the potential to ensure that Wolverhampton city centre continues to remain competitive, namely by securing Debenhams which, together with wider improvements to the retail offer, will tangibly enhance its appeal as sub-regional shopping destination.
- 5.47 The positive impact on the comparison goods turnover of Wolverhampton city centre as a result of the Mander Centre commitment will, if delivered as planned, largely offset the negative impacts expected from the proposed development and other commitments elsewhere. This is set out below:

Table 5.6: Cumulative Impact with Uplift in Wolverhampton City Centre Turnover

Pre-MGDOV Turnover (2020)	Diversion to MGDOV & Commitments	Net Difference With TC Commitment	Residual Turnover (2020)	Impact
£545.19m	£35.99m	-£3.58m	£541.61m	-0.7%

Source: Appendix 2, Table 13b

- 5.48 As demonstrated above, the uplift in the total comparison goods turnover of Wolverhampton city centre at 2020 would reduce the negative impact overall to 0.7%.

- 5.49 It is, however, important to acknowledge the risk posed by the trading of MGDOV on the long-term investment potential within the wider city centre. The planned investment at the Mander Centre will be principally brought to fruition through the trading of Debenhams and whilst this will help to generate footfall, such benefits could be undermined by competing out-of-centre facilities at Cannock in the long term.
- 5.50 A key issue will be the potentially harmful impact of MGDOV on the Council's strategy to deliver 35,000 m² gross comparison goods floorspace in Wolverhampton city centre up to 2026. The relative proximity of MGDOV means that it has the propensity to erode Wolverhampton's market share of comparison goods expenditure if indeed it proves to be a popular shopping destination. As such, retailers in Wolverhampton city centre may absorb less of the available expenditure growth, thus constraining their trading performance. This could reduce the propensity for future investment which is needed to ensure that the growth strategy for the city centre is fulfilled.
- 5.51 It should be noted that the proposed development will have the propensity to divert some trade away from food and drink (Class A3) businesses in Wolverhampton city centre. Proportionate to the comparison goods turnover that we estimate will be diverted to the proposed development (representing 11.6% of the retail turnover for the proposal), we estimate that up to £1.25m could be lost from food and drink businesses in the city centre. However, some of this impact could be offset by additional shoppers being drawn to the new Debenhams store and improved Mander Centre, resulting in greater dwell time for making linked-trip food and drink purchases.

Summary Position

- 5.52 As identified in our analysis above, the proposed development is expected to divert 11.6% of its turnover from Wolverhampton city centre's comparison goods retailers. Whilst this will result in a negative impact at 2020, we do not consider that this would be significant adverse.
- 5.53 The scale of the city centre's retail offer and the improvements that will be brought by the Mander Centre investment (namely the addition of Debenhams which will drive footfall) will ensure that it remains competitive and attractive as a sub-regional shopping destination. Consequently, the city centre will be in a stronger position to withstand the impact of the proposed development in the short term.

- 5.54 We have carefully considered the health of Wolverhampton city centre (see Section 3) and, whilst this points to a varied performance against the different indicators, its overall vitality and viability is currently stable. Whilst this is testament to the city centre maintaining its market share of comparison goods retailing in the region, there is a risk that the trading of MGDOV will reduce Wolverhampton city centre's market share over the longer term and adversely impact upon the city's vision to bring forward future investment to realise growth.

Stafford

- 5.55 The latest household survey data indicates that Stafford town centre has relatively high levels of market penetration within Zones 7 and 8 of the study area (21.4% and 29.2% respectively), which form part of the proposed development's primary and secondary catchment area to the north/north-east and west (Appendix 2, Table 4a). It should be noted, however, that the market penetration of Stafford town centre for clothing and footwear spend in Zones 7 and 8 is higher, at 28% and 36% respectively.
- 5.56 In addition to the above, the town centre also attracts £9.32m of available comparison goods spend generated within Zone 1, as the central zone for Cannock. Accordingly, there is a greater propensity for the proposed development to compete with Stafford town centre in attracting spend from Zones 1, 7 and 8.
- 5.57 The highest levels of market penetration are within the central zones for Stafford (Zones 23 and 24 of the study area) which account for 45% (£94.22m) of the town centre's total comparison goods turnover. Within Zone 24 in particular (covering the town to the north), the town centre has a high rate of expenditure retention for comparison goods (74.3%), although the rate of retention decreases to 59.8% for the southern side of the town (Appendix 2, Table 4a).
- 5.58 In considering the proportion of trade that the proposed development is likely to draw from those zones forming Stafford town centre's retail catchment, we have had regard to the relative accessibility of the former for shoppers residing in those areas. In particular, the M6 motorway facilitates excellent road linkage between junctions 12 and 13, in addition to the A34. Both routes provide quick and easy access from Stafford to Cannock, and we therefore expect the proposed development to have greater market penetration in the areas along these routes.

5.59 Given the above factors, we consider that a midscale outlet facility at Cannock, which would be of a substantial size, has the potential to pose a significant degree of competition with Stafford town centre for the attraction of comparison goods spend. This takes into account the likely overlap in the predominantly midscale shopping offer of Stafford town centre, which is primarily geared towards clothing and footwear goods (as identified earlier, both would form the predominant retail offer of the proposed development).

Trade Diversion and Impact

5.60 It is estimated that the proposed development will divert £11.06m from Stafford town centre at 2020, resulting in a negative impact of 4.6%. This is set out below:

Table 5.7: Trade Diversion and Solus Impact of MGDOV (Stafford)

Pre-MGDOV Turnover (2020)	Diversion to MGDOV	Residual Turnover (2020)	Impact
£238.76m	£11.04m	£227.72m	-4.6%

Source: Appendix 2, Tables 11 and 12

5.61 The above compares with just £2m trade diversion which has been identified by the applicant in their latest assessment (Supplementary Retail Impact Assessment, Appendix 8, Table 1), consequently resulting in the impact on Stafford town centre being underestimated.

5.62 In addition to the impact expected to arise from the proposed development, the existing turnover of town centre comparison goods retailers will also be impacted upon by some trade diversion to the committed Riverside scheme. We estimate that the latter will generate a total comparison goods turnover of £81.74m at 2020, of which £34.52m (42%) is expected to be drawn from existing comparison goods retailers in Stafford town centre. This reflects the town centre's relatively high rate of expenditure retention based on the latest household survey findings.

5.63 In terms of other commitments, we expect the Friarsgate scheme at Lichfield to divert £2.28m at 2020, having regard to its propensity to attract spend from Zone 7 (Rugeley) which is currently being drawn to Stafford. Relatively negligible proportions of turnover are expected to be diverted from Stafford town centre to other commitments elsewhere, due to Stafford's location and the limited overlap in the respective retail catchment areas.

- 5.64 The cumulative impact on the turnover of existing town centre retailers with all commitments and the proposed development trading at 2020 is summarised below:

Table 5.8: Trade Diversion and Cumulative Impact of MGDOV & Commitments

Pre-MGDOV Turnover (2020)	Diversion to MGDOV & Commitments	Residual Turnover (2020)	Impact
£238.76m	£50.04m	£188.72m	-21.0%

Source: Appendix 2, Tables 11 and 13a

- 5.65 If delivered, the scale and quantum of retail floorspace at Riverside would be expected to generate an overall increase in the comparison goods turnover of Stafford town centre of £31.71m, representing the increased retention of spend which is currently lost to other centres and retail facilities (Appendix 2, Table 13b). This position is summarised below:

Table 5.9: Cumulative Impact with Uplift in Stafford Town Centre Turnover

Pre-MGDOV Turnover (2020)	Diversion to MGDOV & Commitments	Net Difference With TC Commitment	Residual Turnover (2020)	Impact
£238.76m	£50.04m	£31.71m	£270.46m	13.3%

Source: Appendix 2, Table 13b

- 5.66 As demonstrated above, the net uplift in overall comparison goods turnover for Stafford town centre with the trading of the Riverside scheme would equate to a positive impact of 13.3%. It is important to remember, however, that this represents a 'best case' scenario with the Riverside scheme being delivered (and occupied) as planned. Given the propensity for the proposed development to compete for trade with Stafford, which we expect to be borne out in the identified trade diversion at 2020, the full potential of Riverside may be not be realised.
- 5.67 We consider that the competition posed by the proposed development, having regard to the significant overlap in its comparison goods offer with that of Stafford town centre, could impact upon the latter through declines in footfall, retailer demand and shopping rents. Such effects could tangibly impact upon investor confidence, to the detriment of Stafford town centre's future vitality and viability.
- 5.68 The potential of the proposed development to have a role and function which is akin to a traditional town centre, given the scale of its retail offer and supporting food and drink

(Class A3) outlets, means that impacts upon a variety of businesses in Stafford town centre are likely to be experienced. If the percentage of the proposed development's retail turnover expected to be diverted from Stafford town centre (8.7%) were applied in respect of food and drink establishments, this could result in a trade diversion from the latter of £0.94m at 2020.

Summary Position

- 5.69 In forming our view on trade diversion in respect of Stafford town centre, we have given careful consideration to the scale and overlap of the comparison goods and ancillary offer posed by the proposed development; its location and accessibility to Stafford via excellent road links, along which we expect greater market penetration; and its likely influence over shopping patterns in the area to the north of Cannock from where Stafford currently draws trade.
- 5.70 Whilst the current performance of Stafford town centre against NPPG indicators is better than that of Walsall town centre, we remain of the view that it is vulnerable. This has regard to vacancy levels which have increased above the national average, the closure of the Co-operative department store which has resulted in the loss of a key anchor in the primary shopping area, and the potential risk to retailer demand and investor confidence.
- 5.71 In view of the above, we consider that, on balance, the impact of the proposed development on the vitality and viability of Stafford town centre will be **significant adverse**.

Lichfield

- 5.72 The latest household survey indicates that Lichfield is currently retaining 42.3% of comparison goods spend generated within Zone 6 of the study area (this being the central zone in which the city is located). However, its retention of spend on clothing and footwear goods from Zone 6 is much less, at 25%.
- 5.73 Lichfield attracts just over 21% of comparison goods spend in Zone 2, which encompasses the town of Burntwood. This is unsurprising since the comparison goods offer of Burntwood town centre is very limited. Collectively, expenditure being drawn from Zones 2 and 6 accounts for 67% (£72.08) of Lichfield city centre's total comparison goods turnover (Appendix 2, Table 4a).

- 5.74 In contrast to the above, Lichfield city centre has only negligible levels of market penetration in the areas to the west beyond Burntwood. As such, it attracts just 0.7% of its comparison goods turnover from Zone 1 – the central zone for Cannock – and 2.5% from Zone 3. Lichfield has increased market penetration into Zone 5, which covers the northern parts of Sutton Coldfield and Shenstone, accounting for £9.83m (9.2%) of the total comparison goods turnover for the city centre.
- 5.75 It should be noted that Lichfield currently experiences a high level of expenditure leakage to retail facilities in Tamworth (the latter’s town centre and retail park facilities currently attract almost 30% of available spend in Zone 6), whilst expenditure is also lost to the higher order centres of Sutton Coldfield and Birmingham. The scale of this leakage is more acute within the clothing and footwear comparison goods sector; retail facilities in Tamworth for example are currently attracting 41% of spend from Lichfield.
- 5.76 The proposed development is expected to draw a higher proportion of its trade from Zone 2 (Burntwood), accounting for 4% of its total turnover, given its relative proximity, whilst the trade drawn from Lichfield is expected to account for 2% given its further distance and the relative accessibility of competing centres and facilities, including Resorts World. Consequently, we expect there to be a greater propensity for the proposed development to compete for spend in the Burntwood area, with less influence over shopping patterns in the eastern extremities its catchment, namely Lichfield and the outskirts of Tamworth.

Trade Diversion and Impact

- 5.77 Taking into account current shopping patterns and the extent to which the proposed development will draw trade within the Lichfield retail catchment area, it is estimated that £4.50m will be diverted from comparison goods retailers in the city centre at 2020. This would equate to a negative impact of 3.7%, as summarised below:

Table 5.10: Trade Diversion and Solus Impact of MGDOV (Lichfield)

Pre-MGDOV Turnover (2020)	Diversion to MGDOV	Residual Turnover (2020)	Impact
£121.64m	£4.50m	£117.14m	-3.7%

Source: Appendix 2, Tables 11 and 12

- 5.78 Whilst the level of trade diversion expected from Lichfield city centre is considerably less than that of Walsall, Wolverhampton and Stafford, it is well above the applicant’s latest

estimate of £1.9m (Supplementary Retail Impact Assessment, Appendix 8, Table 1) for the reasons hitherto established.

- 5.79 The cumulative impact of identified commitments trading at 2020 has been carefully considered. It is estimated that there will be relatively small levels of trade diversion to commitments elsewhere, including the Riverside scheme at Stafford (£1.14m) and Grand Central, Birmingham (£1.62m). However, we expect Friarsgate, if delivered in accordance with the consented scheme, would divert £24.66m of turnover from existing comparison goods retailers in the city centre. This is based on the assumption that 25% of Friarsgate's retail turnover would be drawn from existing retailers in the city centre, with the remaining 75% constituting the clawback of comparison goods expenditure which is currently being lost to centres such as Tamworth and Sutton Coldfield. This is summarised below:

Table 5.11: Trade Diversion and Cumulative Impact of MGDOV & Commitments

Pre-MGDOV Turnover (2020)	Diversion to MGDOV & Commitments	Residual Turnover (2020)	Impact
£121.64m	£33.35m	£88.29m	-27.4%

Source: Appendix 2, Tables 11 and 13a

- 5.80 Whilst the cumulative impact on the turnover of existing city centre retailers at 2020 would appear to be high, it is important to understand that the quantum of floorspace and mix of retailers that the Friarsgate scheme would introduce to Lichfield city centre would significantly increase its market share, ensuring that it retains a greater proportion of future expenditure growth to offset the initial impact at 2020. In terms of the city centre as a whole, we estimate that the Friarsgate scheme will result in a net uplift to the total comparison goods turnover of £63.88m. This is summarised below:

Table 5.12: Cumulative Impact with Uplift in Lichfield City Centre Turnover

Pre-MGDOV Turnover (2020)	Diversion to MGDOV & Commitments	Net Difference with TC Commitment	Residual Turnover (2020)	Impact
£121.64m	£33.35m	£63.88m	£185.52m	52.5%

Source: Appendix 2, Table 13b

- 5.81 The above demonstrates that the addition of the Friarsgate scheme, as currently consented, would grow the total comparison goods turnover of Lichfield city centre by 52.5% after the proposed development and other commitments are taken into account.

5.82 Given the ancillary food and drink (Class A3) offer which can be expected at the proposed development, we estimate that there would be some trade diversion from similar businesses in Lichfield city centre though this would be relatively small compared with the other centres assessed above. We estimate that this could be up to £0.38m, although some of this loss would be offset by additional shoppers being drawn to the city centre with the trading of the Friarsgate scheme, if this is indeed delivered.

5.83 On balance, we consider that Lichfield city centre will be well placed to withstand the impacts posed by the proposed development and other commitments without suffering a significant decline in its overall vitality and viability.

Summary Position

5.84 As identified in Section 3 of this report, the health of Lichfield city centre continues to be good, with the vacancy rate below the national average, good footfall, good levels of demand from retailers, and strong growth in shopping rents which are significantly ahead of other centres and well above the national average following the impacts of the recession.

5.85 As identified from the latest household survey data, Lichfield city centre has a very limited influence over shopping patterns beyond Burntwood, whilst more generally a significant proportion of comparison goods spend (this being higher for clothing and footwear goods) is being lost from Lichfield's retail catchment area to higher order centres and facilities elsewhere. Consequently, we expect there to be less competition for trade posed by the proposed development.

5.86 Moreover, the level of trade diversion identified is unlikely to harm investor confidence in Lichfield and we therefore consider it unlikely that it would impact on the deliverability of the committed Friarsgate scheme. As noted above, the latter would, if delivered, serve to increase Lichfield city centre's market share of comparison goods expenditure within the catchment area, ensuring that it remains vital and viable.

5.87 On balance, it is considered that the solus and cumulative impacts arising from the proposed development would not result in a significant adverse impact on Lichfield city centre.

Other Centres

- 5.88 Our assessment has considered the solus and cumulative impacts of the proposed development and relevant commitments on other centres within the defined study area. These include Burntwood, Wednesbury, Willenhall and Bilston, whose respective turnovers and impacts are set out in our financial analysis at Appendix 2 (Tables 12 and 13a/13b).
- 5.89 Given the scale and offer of comparison goods retailing within each of the smaller centres in the study area, which tends to be geared towards a limited representation of lower-end national multiples and specialist independents (for example florists, electrical retailers and hardware stores), and the localised catchment areas which they principally serve, we consider that there will be little competition posed by the proposed development.
- 5.90 In view of the above, we estimate that there will be very small levels of trade diversion from smaller centres, including Burntwood (£0.10m), resulting in negative impacts of less than 1% in most instances. In this context, the resultant impacts are not considered to be significant adverse.

6. Summary and Recommendations

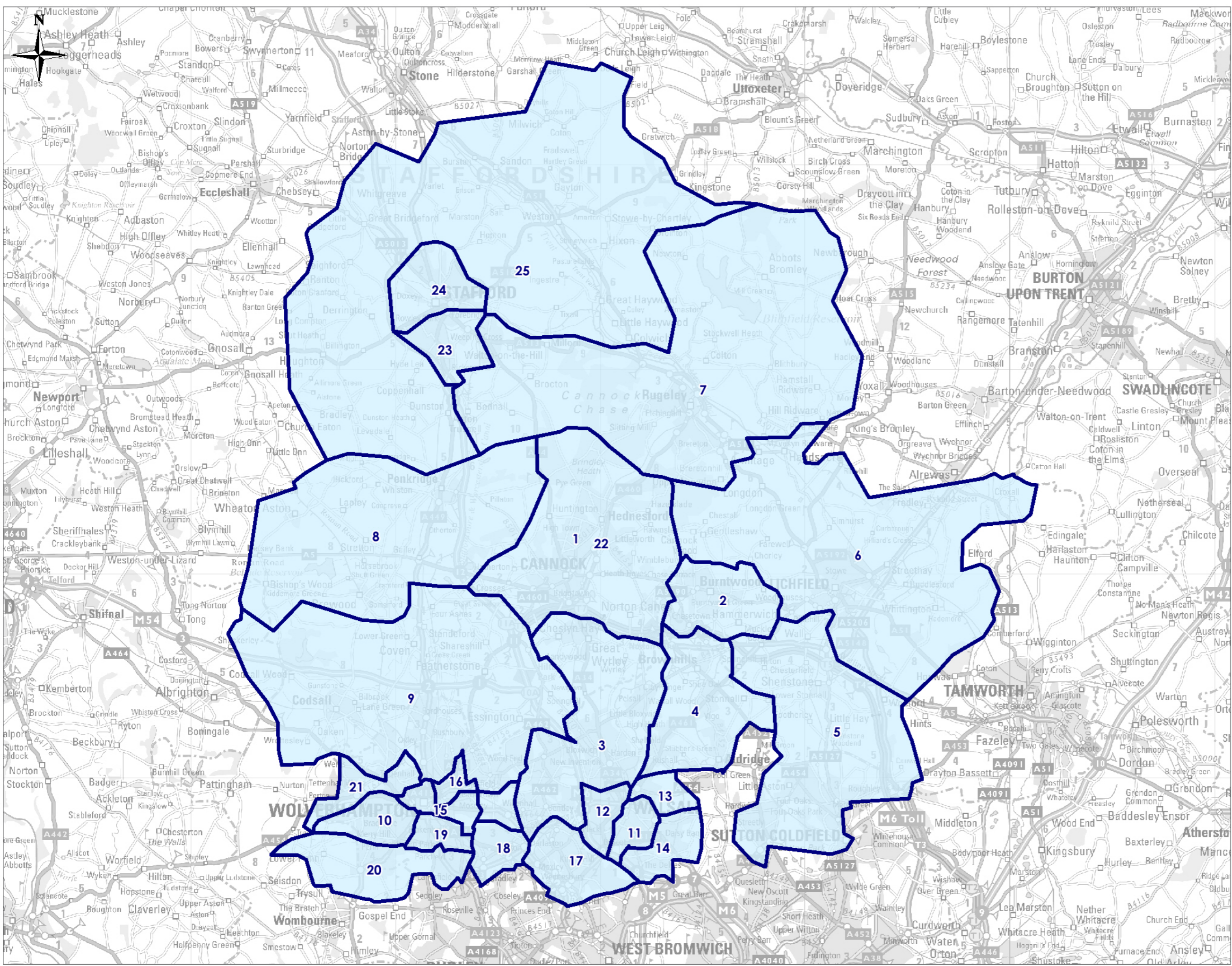
- 6.1 A comprehensive review of town centre impacts arising from the proposed Mill Green Designer Outlet Village (MGDOV) has been undertaken by GVA, pursuant to a hybrid planning application which has been submitted to Cannock Chase District Council by Development Securities (Cannock) Limited.
- 6.2 This report has considered the approach and methodology adopted by the applicants in preparing their original Retail Impact Assessment and subsequent supplementary assessments dated up to August 2015. The applicant's findings on town centre impacts arising from the proposal have been analysed against our own objective assessment of the proposal.
- 6.3 GVA's findings are supported by a full quantitative analysis which has utilised relevant household survey data to assess the likely trade draw of the proposal in the context of established shopping patterns, in addition to an updated healthcheck of the key centres with which the proposal is expected to compete.
- 6.4 In summary, it is our view that:
- The applicant's original Retail Impact Assessment and first supplementary assessment was not transparent in terms of the assumptions applied and the findings reached, being inconsistent with the approach set out in the NPPG;
 - The applicant's latest Supplementary Retail Impact Assessment (August 2015) adopts a clearer approach in terms of applying baseline data inputs, however, it continues to lack the fine-grained approach which is imperative when assessing trade draw and diversion for a scheme of this size;
 - We do not agree that the proposed development will trade in the manner described by the applicant. Due to its location, the demographics of its primary and secondary catchment area, and the competition posed by existing and emerging designer outlet shopping facilities, it is considered that the proposal is likely to trade as a midscale outlet centre;

- The anticipated midscale profile of the proposed development will mean a greater propensity to overlap with comparison goods retailing in sub-regional centres such as Walsall, Wolverhampton, Stafford and Lichfield;
- The anticipated turnover of the proposal will be higher than that estimated by the applicant, in view of average sales densities currently being achieved for other midscale outlet centres and taking into account growth, thus increasing the proportions of turnover that are expected to be diverted from impacted centres;
- The catchment area of the proposal will be constrained by the competing facilities and offer of Resorts World at Solihull;
- The solus and cumulative impacts that are expected to fall on Walsall and Stafford town centres are considered to be **significant adverse** and could not be overcome by planning conditions to control the development;
- The solus and cumulative impacts on the turnover of existing retailers in Wolverhampton and Lichfield, in addition to smaller centres within the defined study area, can be sustained and are not deemed to be significantly adverse;
- However, the impact on Wolverhampton city centre to fulfil its vision for the growth and quality of its shopping offer could be harmed in the longer term by the competition posed by MGDOV. If the latter proves to be a popular out-of-centre shopping destination, this could further erode Wolverhampton city centre's market share of comparison goods expenditure, constraining the trading potential of its retailers and thus reducing the propensity for investment. The potential for negative impact on future investment in Wolverhampton needs to be considered in the planning balance.

6.5 In view of the above, the findings of GVA's review conclude that, by virtue of the significant adverse impacts that would be experienced by Walsall and Stafford town centres, the application does not satisfy Paragraph 26 of the NPPF and should therefore be refused.



Appendix 1



Study Area & Survey Zones

Key

- Study Area
- Survey Zone

Zone Postal Sectors

1	WS11 0/1/4/5/6/7/8/9, WS12 0/1/2/3/4
2	WS7 0/1/2/3/4/9
3	WS2 0/7, WS3 1/2/3/4/5 WS6 6/7, WV12 4/5, WV13 1/2
4	WS4 1, WS8 6/7, WS9 8/9
5	WS14 0, B74 2/3/4, B75 5
6	WS13 6/7/8, WS14 9, WS15 4
7	WS15 1/2/3, ST17 0
8	ST19 5/9
9	WV6 9, WV8 1/2, WV9 5 WV10 6/7/8/9, WV11 1/2/3
10	WV3 0/7/8/9
11	WS1 1/2/3/4
12	WS2 8/9
13	WS4 2
14	WS5 3/4
15	WV1 1/2/3/4
16	WV10 0
17	WV13 3
18	WV14 0/6/7
19	WV2 1/2/3/4
20	WV4 4/5/6
21	WV6 0/8
22	WS10 0/7/8/9
23	ST17 4/9
24	ST16 1/2/3
25	ST18 0/9

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Appendix 2

Table 1: Population Within Study Area

	Zone																									Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
2015	79,127	29,800	125,367	46,513	46,116	47,554	42,553	14,878	113,152	30,352	27,089	22,821	4,774	21,605	17,114	11,101	8,204	19,142	15,915	21,502	24,034	48,468	27,593	31,101	17,237	893,112
2020	80,523	30,588	128,289	47,662	47,588	48,773	43,351	15,037	115,027	30,891	27,851	23,436	4,905	22,332	17,381	11,266	8,360	19,521	16,129	21,912	24,490	50,277	28,120	31,732	17,579	913,020
2022	81,072	30,906	129,440	48,109	48,145	49,264	43,653	15,116	115,853	31,117	28,148	23,671	4,956	22,605	17,497	11,336	8,424	19,679	16,218	22,081	24,679	50,968	28,318	31,976	17,712	920,943
Change, 2015 - 2020	1,396	788	2,922	1,149	1,472	1,219	798	159	1,875	539	762	615	131	727	267	165	156	379	214	410	456	1,809	527	631	342	19,908
%	1.8%	2.6%	2.3%	2.5%	3.2%	2.6%	1.9%	1.1%	1.7%	1.8%	2.8%	2.7%	2.7%	3.4%	1.6%	1.5%	1.9%	2.0%	1.3%	1.9%	1.9%	3.7%	1.9%	2.0%	2.0%	2.2%
Change, 2015 - 2022	1,945	1,106	4,073	1,596	2,029	1,710	1,100	238	2,701	765	1,059	850	182	1,000	383	235	220	537	303	579	645	2,500	725	875	475	27,831
%	2.5%	3.7%	3.2%	3.4%	4.4%	3.6%	2.6%	1.6%	2.4%	2.5%	3.9%	3.7%	3.8%	4.6%	2.2%	2.1%	2.7%	2.8%	1.9%	2.7%	2.7%	5.2%	2.6%	2.8%	2.8%	3.1%

Notes:

1. Population figures obtained from Experian Business Strategies Database 2015.

Table 2a: Per Capita Comparison Goods Expenditure - Clothing & Footwear

	Zone																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2015	£682	£701	£591	£671	£1,033	£845	£821	£898	£647	£740	£637	£558	£878	£850	£579	£581	£573	£550	£572	£684	£792	£535	£703	£707	£1,043
2020	£765	£787	£664	£754	£1,160	£948	£921	£1,008	£726	£830	£715	£626	£985	£954	£650	£652	£643	£617	£642	£768	£889	£601	£789	£794	£1,170
2022	£812	£835	£704	£800	£1,231	£1,006	£978	£1,070	£771	£881	£758	£664	£1,046	£1,012	£689	£692	£682	£655	£681	£815	£943	£638	£838	£842	£1,242

Table 2b: Per Capita Comparison Goods Expenditure - Furniture, Floor Coverings & Soft Furnishings

	Zone																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2015	£314	£336	£266	£314	£457	£380	£385	£415	£296	£335	£254	£224	£364	£368	£231	£243	£254	£233	£238	£326	£333	£230	£338	£338	£503
2020	£352	£377	£299	£353	£513	£427	£432	£466	£332	£376	£285	£251	£408	£412	£259	£273	£285	£262	£267	£366	£374	£258	£379	£379	£564
2022	£373	£400	£317	£375	£545	£453	£458	£494	£353	£399	£302	£267	£433	£438	£275	£290	£302	£278	£284	£388	£396	£273	£402	£402	£599

Table 2c: Per Capita Comparison Goods Expenditure - Electrical Goods

	Zone																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2015	£275	£282	£249	£277	£377	£318	£331	£346	£278	£280	£232	£219	£351	£322	£232	£276	£263	£236	£237	£284	£314	£227	£272	£266	£414
2020	£309	£316	£279	£311	£423	£357	£371	£389	£312	£314	£260	£246	£394	£362	£260	£310	£296	£265	£266	£318	£352	£254	£305	£299	£464
2022	£327	£335	£296	£330	£449	£379	£394	£412	£331	£333	£276	£261	£418	£384	£276	£329	£314	£281	£283	£338	£373	£270	£324	£317	£493

Table 2d: Per Capita Comparison Goods Expenditure - Personal & Other Goods

	Zone																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2015	£1,065	£1,119	£907	£1,032	£1,518	£1,278	£1,260	£1,352	£1,007	£1,108	£865	£774	£1,243	£1,242	£819	£831	£906	£818	£816	£1,066	£1,151	£804	£1,062	£1,072	£1,605
2020	£1,195	£1,224	£992	£1,129	£1,661	£1,398	£1,378	£1,479	£1,101	£1,212	£946	£846	£1,360	£1,359	£896	£908	£991	£895	£893	£1,166	£1,259	£879	£1,162	£1,172	£1,756
2022	£1,268	£1,333	£1,080	£1,229	£1,808	£1,522	£1,501	£1,611	£1,199	£1,320	£1,031	£921	£1,481	£1,480	£975	£989	£1,079	£974	£972	£1,270	£1,371	£957	£1,265	£1,276	£1,912

Notes:

1. Per capita expenditure data taken from Experian Business Strategies database for each zone and projected forward using forecasts within Retail Planner Briefing Note 12.1, Figures 1a and 1b.
2. Excludes Special Forms of Trading (adjusted to exclude sales from stores) derived from Experian Retail Planner Briefing Note 12.1, Appendix 3

Growth Forecasts:	Year to:	% Change	SFT:	Year to:	% Change
	2013	4.60%		2014	11.70%
	2014	5.60%		2015	12.50%
	2015	4.40%		2016	13.20%
	2016	3.10%		2017	14.00%
	2017	3.10%		2018	14.70%
	2018	3.10%		2019	15.30%
	2019	3.10%		2020	15.70%
	2020	3.10%		2021	15.90%
	2021	3.10%		2022	16.00%
	2022	3.30%			

Table 3a: Total Comparison Goods Expenditure - Clothing & Footwear

	Zone (£m)																									Total (£m)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
2015	£53.97	£20.90	£74.13	£31.23	£47.64	£40.18	£34.93	£13.36	£73.24	£22.46	£17.25	£12.72	£4.19	£18.36	£9.91	£6.45	£4.70	£10.53	£9.10	£14.71	£19.03	£25.95	£19.40	£21.99	£17.97	£624.32
2020	£61.63	£24.08	£85.14	£35.91	£55.18	£46.26	£39.94	£15.16	£83.56	£25.65	£19.90	£14.67	£4.83	£21.30	£11.29	£7.34	£5.38	£12.05	£10.35	£16.82	£21.77	£30.21	£22.19	£25.18	£20.57	£716.37
2022	£65.85	£25.82	£91.16	£38.47	£59.24	£49.58	£42.68	£16.17	£89.32	£27.42	£21.34	£15.72	£5.18	£22.88	£12.06	£7.84	£5.75	£12.89	£11.05	£17.99	£23.28	£32.50	£23.72	£26.93	£22.00	£766.85

Table 3b: Total Comparison Goods Expenditure - Furniture, Floor Coverings & Soft Furnishings

	Zone (£m)																									Total (£m)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
2015	£24.81	£10.00	£33.38	£14.63	£21.09	£18.07	£16.38	£6.17	£33.51	£10.16	£6.87	£5.11	£1.74	£7.94	£3.95	£2.70	£2.08	£4.47	£3.79	£7.01	£8.00	£11.13	£9.32	£10.50	£8.66	£281.46
2020	£28.33	£11.52	£38.33	£16.82	£24.42	£20.80	£18.73	£7.00	£38.23	£11.61	£7.93	£5.89	£2.00	£9.21	£4.50	£3.07	£2.38	£5.11	£4.31	£8.02	£9.15	£12.95	£10.66	£12.02	£9.92	£322.93
2022	£30.27	£12.36	£41.05	£18.02	£26.22	£22.30	£20.01	£7.47	£40.86	£12.41	£8.51	£6.31	£2.15	£9.90	£4.80	£3.28	£2.55	£5.47	£4.60	£8.57	£9.78	£13.94	£11.39	£12.86	£10.60	£345.67

Table 3c: Total Comparison Goods Expenditure - Electrical Goods

	Zone (£m)																									Total (£m)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
2015	£21.75	£8.39	£31.20	£12.88	£17.39	£15.14	£14.08	£5.15	£31.44	£8.49	£6.27	£5.00	£1.68	£6.96	£3.96	£3.06	£2.16	£4.52	£3.78	£6.10	£7.53	£10.99	£7.51	£8.28	£7.13	£250.85
2020	£24.85	£9.67	£35.83	£14.81	£20.14	£17.43	£16.10	£5.84	£35.87	£9.70	£7.24	£5.76	£1.93	£8.08	£4.52	£3.49	£2.47	£5.18	£4.30	£6.97	£8.62	£12.79	£8.59	£9.48	£8.16	£287.80
2022	£26.55	£10.37	£38.37	£15.86	£21.63	£18.68	£17.20	£6.23	£38.34	£10.37	£7.76	£6.17	£2.07	£8.67	£4.82	£3.72	£2.64	£5.54	£4.58	£7.46	£9.22	£13.76	£9.18	£10.14	£8.73	£308.07

Table 3d: Total Comparison Goods Expenditure - Personal & Other Goods

	Zone (£m)																									Total (£m)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
2015	£84.27	£33.35	£113.68	£48.01	£70.02	£60.78	£53.61	£20.12	£113.96	£33.64	£23.44	£17.66	£5.94	£26.84	£14.02	£9.22	£7.43	£15.66	£12.99	£22.92	£27.66	£38.95	£29.31	£33.33	£27.67	£944.46
2020	£96.24	£37.44	£127.23	£53.81	£79.03	£68.18	£59.73	£22.24	£126.70	£37.45	£26.36	£19.83	£6.67	£30.35	£15.57	£10.23	£8.28	£17.47	£14.40	£25.55	£30.83	£44.19	£32.67	£37.20	£30.86	£1,058.50
2022	£102.83	£41.19	£139.80	£59.14	£87.07	£75.00	£65.50	£24.35	£138.96	£41.08	£29.01	£21.81	£7.34	£33.45	£17.07	£11.21	£9.09	£19.17	£15.76	£28.03	£33.83	£48.78	£35.82	£40.82	£33.86	£1,159.98

Table 3e: Total Comparison Goods Expenditure - All Goods

	Zone (£m)																									Total (£m)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
2015	£184.80	£72.64	£252.39	£106.74	£156.15	£134.18	£119.00	£44.81	£252.14	£74.75	£53.83	£40.48	£13.54	£60.11	£31.83	£21.43	£16.37	£35.18	£29.66	£50.74	£62.23	£87.01	£65.53	£74.10	£61.44	£2,101.08
2020	£211.06	£82.71	£286.54	£121.35	£178.77	£152.67	£134.50	£50.24	£284.36	£84.40	£61.43	£46.14	£15.44	£68.94	£35.87	£24.14	£18.51	£39.80	£33.36	£57.36	£70.36	£100.14	£74.10	£83.88	£69.52	£2,385.59
2022	£225.51	£89.73	£310.38	£131.50	£194.16	£165.56	£145.40	£54.22	£307.48	£91.27	£66.62	£50.01	£16.74	£74.90	£38.76	£26.06	£20.03	£43.07	£36.00	£62.05	£76.10	£108.98	£80.10	£90.74	£75.19	£2,580.57

Notes:

1. Total comparison goods expenditure calculated by multiplying population with per capita comparison goods expenditure, by zone.
2. Table 3e excludes expenditure on DIY Goods.

Table 4a. Survey Derived Comparison Goods Market Shares

Within Study Area	Zones (Em)																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
Walsall	9.7%	8.8%	36.6%	37.1%	6.4%	1.0%	2.4%	0.2%	2.9%	0.3%	58.0%	63.7%	56.9%	42.4%	0.0%	0.0%	20.3%	0.8%	1.1%	0.3%	0.0%	36.6%	0.6%	0.3%	0.4%
Wolverhampton	3.0%	0.5%	7.4%	0.4%	0.0%	0.0%	0.5%	7.5%	41.5%	70.3%	0.7%	5.4%	0.4%	0.4%	62.5%	61.6%	41.7%	40.4%	68.9%	71.8%	68.0%	5.1%	0.5%	0.9%	0.7%
Lichfield	0.7%	21.1%	2.5%	4.9%	6.3%	42.3%	4.9%	0.0%	0.2%	0.0%	0.2%	0.0%	2.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%
Stafford	5.0%	1.3%	0.0%	0.3%	0.0%	0.8%	21.4%	29.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	59.8%	74.3%	56.6%	
Burntwood	0.0%	14.8%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Cannock	41.7%	12.3%	8.4%	6.8%	0.5%	1.3%	4.4%	14.3%	3.4%	0.0%	0.2%	0.4%	0.9%	0.3%	0.0%	4.2%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	2.0%	1.5%	3.5%
Rugeley	0.7%	2.1%	0.0%	0.0%	0.8%	3.8%	28.8%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.3%	5.5%	
Hednesford	4.1%	0.3%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Wednesbury	0.8%	0.0%	3.3%	2.2%	0.9%	0.0%	0.2%	0.0%	1.3%	0.0%	1.8%	3.0%	1.3%	1.6%	0.1%	0.6%	1.1%	0.3%	0.0%	1.1%	0.0%	8.9%	0.0%	0.2%	0.0%
Bilston	0.1%	0.0%	0.7%	0.0%	0.0%	0.0%	0.0%	0.2%	1.6%	1.8%	0.5%	0.1%	0.5%	0.6%	5.4%	1.3%	2.3%	19.8%	4.7%	0.9%	0.6%	0.9%	0.0%	0.0%	0.0%
Willenhall	0.1%	0.0%	7.7%	0.1%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.3%	0.4%	0.0%	1.4%	0.0%	8.9%	0.3%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Wednesfield	0.0%	0.0%	4.1%	0.0%	0.0%	0.0%	0.0%	0.9%	5.9%	0.0%	0.0%	0.1%	0.0%	0.0%	1.6%	0.2%	1.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%
Aldridge	0.1%	0.0%	0.1%	6.7%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.2%	1.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%
Sutton Coldfield	0.0%	1.3%	0.0%	6.5%	34.7%	1.3%	0.4%	0.0%	0.0%	0.0%	3.5%	0.0%	2.0%	6.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Centres	1.9%	1.5%	5.3%	4.5%	3.7%	0.8%	0.8%	4.6%	3.9%	0.0%	0.0%	2.4%	0.8%	0.0%	1.0%	0.4%	3.3%	0.1%	0.0%	0.0%	0.0%	2.1%	0.0%	0.0%	0.9%
Retail Parks	16.6%	8.1%	12.6%	5.4%	1.3%	1.6%	13.5%	18.9%	22.4%	14.0%	16.5%	16.5%	14.0%	13.6%	11.8%	17.3%	13.5%	9.7%	14.1%	10.3%	10.0%	18.1%	21.6%	11.4%	12.1%
Supermarkets	0.4%	0.4%	0.0%	0.5%	0.1%	0.0%	2.6%	0.5%	2.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.3%	3.3%	0.8%
Standalone Retail Warehouses	0.5%	2.3%	1.5%	1.6%	0.5%	0.3%	0.8%	0.9%	0.6%	0.0%	0.0%	0.0%	0.2%	0.2%	0.3%	0.5%	0.6%	0.7%	0.0%	0.0%	0.3%	0.3%	1.1%	0.7%	1.3%
Other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	0.2%	0.1%	0.1%	0.0%	1.9%	1.3%	0.1%	1.0%	0.0%	0.0%	1.4%	0.1%	3.5%	1.0%	3.6%
Total Within Study Area	85.4%	74.8%	90.6%	77.2%	55.2%	53.7%	80.7%	77.4%	86.9%	87.2%	81.8%	92.0%	82.2%	67.1%	86.1%	87.4%	92.8%	73.2%	88.9%	84.4%	80.8%	72.6%	91.7%	93.9%	85.9%
Other Centres / Stores Outside of Study Area	14.6%	25.2%	9.4%	22.8%	44.8%	46.3%	19.3%	22.6%	13.1%	12.8%	18.2%	8.0%	17.8%	32.9%	13.9%	12.6%	7.2%	26.8%	11.1%	15.6%	19.2%	27.4%	8.3%	6.1%	14.1%
TOTAL	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Notes:

- Market shares derived from household survey data provided by applicant in respect of Zones 1 - 9; survey data supporting the Black Country Centres Study and the Stafford and Stone Town Centre Retail Capacity Update has been utilised in respect of Zones 10 - 25.
- Market shares have been adjusted to take into account the estimated trade draw of New Square, West Bromwich.
- Market shares adjusted to exclude internet purchases / 'don't know' responses.

Table 4b. Survey Derived Comparison Goods Turnover (2015)

Within Study Area	Zones (£m)																									Total from Study Area (£m)	Inflow Em	Total Em
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25			
Walsall	£17.97	£6.37	£92.43	£39.61	£9.95	£1.28	£2.82	£0.09	£7.42	£0.25	£31.23	£25.80	£7.70	£25.49	£0.00	£0.00	£3.33	£0.29	£0.32	£0.13	£0.00	£31.85	£0.41	£0.23	£0.26	£305.24	£9.44	£314.68
Wolverhampton	£5.47	£0.35	£18.56	£0.41	£0.00	£0.00	£0.58	£3.34	£104.70	£52.52	£0.39	£2.19	£0.06	£0.24	£19.90	£13.20	£6.82	£14.22	£20.45	£36.43	£42.34	£4.41	£0.36	£0.70	£0.45	£348.07	£135.36	£483.44
Lichfield	£1.38	£15.32	£6.41	£5.18	£9.83	£56.76	£5.82	£0.00	£0.59	£0.00	£0.10	£0.00	£0.33	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£101.97	£5.37	£107.34
Stafford	£9.32	£0.93	£0.00	£0.31	£0.00	£1.13	£25.52	£13.10	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.18	£0.00	£39.18	£55.04	£34.80	£179.55	£31.69	£211.24
Burntwood	£0.08	£10.78	£0.20	£0.14	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£11.21	£0.00	£11.21
Cannock	£77.06	£8.95	£21.14	£7.26	£0.80	£1.75	£5.29	£6.43	£8.60	£0.00	£0.13	£0.15	£0.12	£0.18	£0.00	£0.90	£0.00	£0.00	£0.00	£0.00	£0.06	£0.00	£1.34	£1.08	£2.17	£143.42	£7.55	£150.97
Rugeley	£1.21	£1.52	£0.00	£0.00	£1.29	£5.08	£34.28	£0.08	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.22	£0.20	£3.40	£47.30	£0.00	£47.30
Hednesford	£7.49	£0.20	£0.41	£0.00	£0.00	£0.00	£0.00	£0.00	£1.67	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£9.77	£0.00	£9.77
Wednesbury	£1.42	£0.00	£8.44	£2.38	£1.43	£0.00	£0.18	£0.00	£3.18	£0.00	£0.98	£1.21	£0.17	£0.99	£0.03	£0.14	£0.19	£0.12	£0.00	£0.55	£0.00	£7.72	£0.00	£0.13	£0.00	£29.27	£0.00	£29.27
Bilston	£0.20	£0.00	£1.85	£0.00	£0.00	£0.00	£0.00	£0.09	£4.02	£1.34	£0.26	£0.05	£0.06	£0.37	£1.72	£0.27	£0.38	£6.97	£1.39	£0.46	£0.37	£0.74	£0.00	£0.00	£0.00	£20.54	£0.00	£20.54
Willenhall	£0.22	£0.00	£19.46	£0.15	£0.00	£0.00	£0.00	£0.00	£0.58	£0.00	£0.00	£0.13	£0.05	£0.00	£0.46	£0.00	£1.46	£0.10	£0.05	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£22.65	£0.00	£22.65
Wednesfield	£0.00	£0.00	£10.36	£0.00	£0.00	£0.00	£0.00	£0.40	£14.91	£0.00	£0.00	£0.05	£0.00	£0.51	£0.05	£0.16	£0.00	£0.00	£0.00	£0.06	£0.08	£0.00	£0.00	£0.00	£0.00	£26.58	£0.00	£26.58
Aldridge	£0.12	£0.00	£0.34	£7.16	£0.00	£0.61	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.30	£0.91	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.42	£0.00	£0.00	£0.00	£9.86	£0.00	£9.86
Sutton Coldfield	£0.00	£0.95	£0.00	£6.91	£54.20	£1.78	£0.48	£0.00	£0.00	£0.00	£1.90	£0.00	£0.28	£3.86	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£70.37	£12.42	£82.79
Other Centres	£3.45	£1.08	£13.44	£4.85	£5.74	£1.09	£0.91	£2.05	£9.93	£0.00	£0.00	£0.95	£0.10	£0.00	£0.32	£0.08	£0.53	£0.03	£0.00	£0.00	£0.00	£1.84	£0.00	£0.00	£0.55	£46.97	£0.00	£46.97
Retail Parks	£30.75	£5.91	£31.77	£5.72	£1.98	£2.15	£16.11	£8.47	£56.36	£10.48	£8.89	£6.68	£1.90	£8.17	£3.74	£3.70	£2.20	£3.41	£4.18	£5.24	£6.23	£15.78	£14.16	£8.44	£7.42	£269.85	£0.00	£269.85
Supermarkets	£0.76	£0.32	£0.00	£0.53	£0.14	£0.00	£3.13	£0.22	£5.49	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.48	£2.48	£0.49	£15.04	£0.00	£15.04	
Standalone Retail Warehouses	£0.84	£1.65	£3.91	£1.76	£0.82	£0.43	£0.92	£0.42	£1.61	£0.00	£0.00	£0.00	£0.03	£0.11	£0.10	£0.11	£0.11	£0.23	£0.00	£0.00	£0.18	£0.30	£0.71	£0.55	£0.81	£15.59	£0.00	£15.59
Other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.61	£0.13	£0.04	£0.01	£0.00	£0.61	£0.27	£0.02	£0.37	£0.00	£0.00	£0.84	£0.08	£2.26	£0.71	£2.20	£8.14	£0.00	£8.14
Total Within Study Area	£157.74	£54.34	£228.72	£82.37	£86.19	£72.07	£96.05	£34.70	£219.06	£65.21	£44.01	£37.26	£11.12	£40.32	£27.42	£18.73	£15.20	£25.74	£26.38	£42.81	£50.27	£63.21	£60.12	£69.56	£52.80	£1,681.39	£201.82	£1,883.21
Other Centres / Stores Outside of Study Area	£27.05	£18.31	£23.67	£24.37	£69.96	£62.11	£22.95	£10.10	£33.08	£9.54	£9.82	£3.23	£2.42	£19.78	£4.41	£2.70	£1.18	£9.44	£3.28	£7.93	£11.96	£23.80	£5.41	£4.54	£8.64	£419.70	£0.00	£403.52
TOTAL	£184.80	£72.64	£252.39	£106.74	£156.15	£134.18	£119.00	£44.81	£252.14	£74.75	£53.83	£40.48	£13.54	£60.11	£31.83	£21.43	£16.37	£35.18	£29.66	£50.74	£62.23	£87.01	£65.53	£74.10	£61.44	£2,101.08	£0.00	£2,302.70

Notes:

1. Turnovers are calculated from multiplying market shares for the respective goods categories (excluding DIY & gardening goods) by the available expenditure (Tables 3a - 3d).
2. Allowances for inflow of expenditure from beyond the study area are based on judgement, having regard to shopping patterns identified through available household survey data.

Table 5. Survey Derived Comparison Goods Turnover (2020)

Within Study Area	Zones (€m)																									Total from Study Area (€m)	Inflow €m	Total €m
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25			
Walsall	£20.52	£7.26	£104.94	£44.98	£11.45	£1.46	£3.19	£0.11	£8.39	£0.29	£35.53	£29.37	£8.76	£29.13	£0.00	£0.00	£3.75	£0.34	£0.36	£0.15	£0.00	£36.56	£0.46	£0.26	£0.30	£347.57	£10.75	£358.32
Wolverhampton	£6.25	£0.40	£21.10	£0.47	£0.00	£0.00	£0.66	£3.74	£117.88	£59.15	£0.45	£2.49	£0.07	£0.28	£22.43	£14.83	£7.70	£16.07	£22.93	£41.11	£47.79	£5.05	£0.41	£0.79	£0.52	£392.54	£152.65	£545.19
Lichfield	£1.57	£17.38	£7.24	£5.89	£11.23	£64.24	£6.56	£0.00	£0.67	£0.00	£0.12	£0.00	£0.38	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.28	£115.56	£6.08	£121.64
Stafford	£10.65	£1.06	£0.00	£0.36	£0.00	£1.28	£28.87	£14.69	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.21	£0.00	£44.21	£62.25	£39.32	£202.94	£35.81	£238.76
Burntwood	£0.10	£12.16	£0.23	£0.16	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£12.64	£0.00	£12.64
Carnock	£88.01	£10.21	£24.03	£8.26	£0.93	£2.02	£6.01	£7.22	£9.79	£0.00	£0.15	£0.17	£0.14	£0.21	£0.00	£1.01	£0.00	£0.00	£0.00	£0.00	£0.07	£0.00	£1.53	£1.23	£2.47	£163.45	£8.60	£172.05
Rugeley	£1.38	£1.72	£0.00	£0.00	£1.48	£3.76	£38.55	£0.09	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.25	£0.23	£3.84	£53.30	£0.00	£53.30	
Hednesford	£8.56	£0.23	£0.47	£0.00	£0.00	£0.00	£0.00	£0.00	£1.89	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£11.14	£0.00	£11.14
Wednesbury	£1.62	£0.00	£9.62	£2.74	£1.65	£0.00	£0.21	£0.00	£3.60	£0.00	£1.13	£1.40	£0.20	£1.15	£0.04	£0.16	£0.21	£0.14	£0.00	£0.63	£0.00	£8.85	£0.00	£0.15	£0.00	£33.50	£0.00	£33.50
Bilston	£0.23	£0.00	£2.12	£0.00	£0.00	£0.00	£0.11	£4.59	£1.53	£0.30	£0.06	£0.07	£0.42	£1.95	£0.30	£0.44	£7.87	£1.57	£0.52	£0.42	£0.87	£0.00	£0.00	£0.00	£0.00	£23.36	£0.00	£23.36
Willenhall	£0.25	£0.00	£21.99	£0.18	£0.00	£0.00	£0.00	£0.65	£0.00	£0.00	£0.15	£0.06	£0.00	£0.51	£0.00	£1.64	£0.11	£0.05	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£25.60	£0.00	£25.60
Wednesfield	£0.00	£0.00	£11.71	£0.00	£0.00	£0.00	£0.44	£16.84	£0.00	£0.00	£0.06	£0.00	£0.00	£0.57	£0.06	£0.19	£0.00	£0.00	£0.00	£0.07	£0.09	£0.00	£0.00	£0.00	£0.00	£30.02	£0.00	£30.02
Aldridge	£0.14	£0.00	£0.38	£8.06	£0.00	£0.68	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.34	£1.04	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.49	£0.00	£0.00	£0.00	£0.00	£11.13	£0.00	£11.13
Sutton Coldfield	£0.00	£1.08	£0.00	£7.87	£61.97	£2.01	£0.55	£0.00	£0.00	£0.00	£2.17	£0.00	£0.32	£4.43	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£80.38	£14.19	£94.57
Other Centres	£3.94	£1.23	£15.14	£5.46	£6.50	£1.23	£1.02	£2.28	£11.07	£0.00	£0.10	£1.08	£0.12	£0.00	£0.36	£0.10	£0.60	£0.04	£0.00	£0.00	£2.10	£0.00	£0.00	£0.00	£0.62	£52.86	£0.00	£52.86
Retail Parks	£35.12	£6.78	£36.25	£6.57	£2.26	£2.46	£18.33	£9.52	£63.68	£11.96	£10.24	£7.66	£2.19	£9.48	£4.26	£4.21	£2.52	£3.89	£4.75	£5.98	£7.11	£18.34	£16.04	£9.58	£8.43	£307.61	£0.00	£307.61
Supermarkets	£0.87	£0.37	£0.00	£0.59	£0.16	£0.00	£3.51	£0.24	£6.12	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.67	£2.79	£0.56	£16.88	£0.00	£16.88	
Standalone Retail Warehouse	£0.96	£1.90	£4.49	£2.02	£0.95	£0.50	£1.05	£0.48	£1.84	£0.00	£0.00	£0.00	£0.04	£0.13	£0.11	£0.13	£0.12	£0.27	£0.00	£0.00	£0.21	£0.35	£0.80	£0.62	£0.91	£17.86	£0.00	£17.86
Other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.69	£0.15	£0.05	£0.02	£0.00	£0.68	£0.31	£0.02	£0.41	£0.00	£0.00	£0.96	£0.09	£2.57	£0.80	£2.50	£9.26	£0.00	£9.26
Total Within Study Area	£180.16	£61.79	£259.69	£93.61	£98.58	£81.64	£108.51	£38.91	£246.98	£73.62	£50.23	£42.49	£12.69	£46.27	£30.93	£21.10	£17.18	£29.14	£29.66	£48.39	£56.84	£72.79	£67.96	£78.70	£59.73	£1,907.60	£228.09	£2,135.69
Other Centres / Stores Outside of Study Area	£30.90	£20.92	£26.85	£27.75	£80.20	£71.03	£25.99	£11.33	£37.38	£10.78	£11.20	£3.66	£2.75	£22.66	£4.94	£3.04	£1.33	£10.66	£3.70	£8.97	£13.52	£27.35	£6.14	£5.18	£9.79	£477.99	£0.00	£477.99
TOTAL	£211.06	£82.71	£286.54	£121.35	£178.77	£152.67	£134.50	£50.24	£284.36	£84.40	£61.43	£46.14	£15.44	£68.94	£35.87	£24.14	£18.51	£39.80	£33.36	£57.36	£70.36	£100.14	£74.10	£83.88	£69.52	£2,385.59	£228.09	£2,613.68

Notes:

1. Turnovers are calculated from multiplying market shares for the respective goods categories (excluding DIY & gardening goods) by the available expenditure (Tables 3a - 3d).
2. Allowances for inflow of expenditure from beyond the study area are based on judgement, having regard to shopping patterns identified through available household survey data.

Table 6a. Turnover of MGDOV Proposal

	Net Sales Floorspace sq m	2020	2022
Clothing & Footwear	13,252	£88.69	£93.00
Personal & Other Goods	5,680	£38.01	£39.86
Total	18,932	£126.70	£132.85

Notes:

1. Sales density based on £5,600/sq m being achieved by McArthurGlen at 2014.
2. Turnover projected forward by making an allowances for improvements in trading efficiency in accordance with the rates set out in Experian Retail Planner Briefing Note 12.1 (October 2014), Figure 4b.
3. Breakdown of turnover for clothing and footwear, and personal / other goods, taken from the applicant's Planning and Retail Statement, paragraph 8.34.
4. 2013 Prices.

Table 6b. Trade Draw of Proposal (2020)

Comparison Goods	Zone																									Inflow	Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25		
Draw from Zones (£m)	£12.04	£5.07	£12.04	£6.33	£4.43	£2.53	£3.80	£1.90	£7.60	£1.27	£2.53	£1.90	£0.63	£2.53	£1.90	£1.27	£0.63	£1.27	£1.27	£1.90	£1.90	£3.17	£3.80	£3.80	£3.17	£38.01	£126.70
Draw from Zones (%)	9.5%	4.0%	9.5%	5.0%	3.5%	2.0%	3.0%	1.5%	6.0%	1.0%	2.0%	1.5%	0.5%	2.0%	1.5%	1.0%	0.5%	1.0%	1.0%	1.5%	1.5%	2.5%	3.0%	3.0%	2.5%	30.0%	100.0%
Market Share (%)	5.7%	6.1%	4.2%	5.2%	2.6%	1.7%	2.8%	3.8%	2.7%	1.5%	4.1%	4.1%	4.1%	3.7%	5.3%	5.2%	3.4%	3.2%	3.8%	3.3%	2.7%	3.2%	5.1%	4.5%	4.6%		

Notes:

1. Trade draw patterns are informed by the applicant's modelled catchment area (Retail Impact Assessment, p.27) and GVA judgement having regard to the location, scale and type of retail offer likely to be achieved.
2. The turnover and trade draw of the proposal assumes a Design Year of 2020.

Table 7. Turnover with MGDOV (2020)

Within Study Area	Zones (€m)																									Total From Study Area (€m)	Inflow €m	Total €m		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25					
Walsall	£18.85	£6.70	£100.03	£42.36	£10.96	£1.45	£3.03	£0.11	£7.96	£0.29	£33.78	£27.81	£8.24	£27.77	£0.00	£0.00	£3.58	£0.30	£0.33	£0.15	£0.00	£34.63	£0.40	£0.25	£0.30	£329.28	£10.75	£340.02		
Wolverhampton	£5.52	£0.39	£19.81	£0.33	£0.00	£0.00	£0.64	£3.48	£14.40	£58.18	£0.40	£2.32	£0.07	£0.28	£20.96	£13.87	£7.37	£15.46	£21.95	£39.68	£46.26	£4.86	£0.38	£0.73	£0.47	£377.81	£152.65	£530.46		
Lichfield	£1.33	£15.82	£6.80	£5.55	£10.73	£63.13	£6.32	£0.00	£0.61	£0.00	£0.12	£0.00	£0.37	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.27	£111.06	£6.98	£117.14		
Stafford	£9.50	£1.01	£0.00	£0.22	£0.00	£1.22	£27.76	£13.75	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.04	£0.00	£0.00	£0.00	£0.00	£0.00	£0.21	£0.00	£41.76	£59.25	£37.18	£191.91	£35.81	£227.72		
Burntwood	£0.10	£12.09	£0.23	£0.12	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£12.54	£0.00	£12.54		
Cannock	£83.81	£9.28	£22.78	£7.77	£0.93	£2.00	£5.76	£6.87	£9.19	£0.00	£0.15	£0.17	£0.14	£0.21	£0.00	£0.98	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£1.45	£1.22	£2.47	£155.24	£8.60	£163.84	
Rugley	£1.31	£1.66	£0.00	£0.00	£1.42	£5.70	£38.03	£0.09	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.25	£0.23	£3.72	£52.42	£0.00	£52.42	
Hednesford	£8.52	£0.23	£0.47	£0.00	£0.00	£0.00	£0.00	£0.00	£1.87	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£11.08	£0.00	£11.08		
Wednesbury	£1.62	£0.00	£9.52	£2.74	£1.65	£0.00	£0.21	£0.00	£3.57	£0.00	£1.13	£1.40	£0.20	£1.15	£0.04	£0.16	£0.21	£0.14	£0.00	£0.63	£0.00	£8.75	£0.00	£0.15	£0.00	£33.27	£0.00	£33.27		
Bilston	£0.23	£0.00	£2.10	£0.00	£0.00	£0.00	£0.00	£0.11	£4.58	£1.53	£0.30	£0.06	£0.07	£0.42	£1.93	£0.30	£0.43	£7.83	£1.57	£0.52	£0.42	£0.86	£0.00	£0.00	£0.00	£23.27	£0.00	£23.27		
Willenhall	£0.25	£0.00	£21.88	£0.18	£0.00	£0.00	£0.00	£0.65	£0.00	£0.00	£0.15	£0.06	£0.00	£0.51	£0.00	£1.64	£0.11	£0.05	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£25.48	£0.00	£25.48		
Wednesfield	£0.00	£0.00	£11.58	£0.00	£0.00	£0.00	£0.00	£0.44	£16.75	£0.00	£0.00	£0.00	£0.00	£0.55	£0.06	£0.19	£0.00	£0.00	£0.00	£0.07	£0.09	£0.00	£0.00	£0.00	£0.00	£29.79	£0.00	£29.79		
Aldridge	£0.14	£0.00	£0.38	£8.00	£0.00	£0.68	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.34	£1.03	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.49	£0.00	£0.00	£0.00	£11.07	£0.00	£11.07		
Sutton Coldfield	£0.00	£1.05	£0.00	£7.47	£60.10	£1.97	£0.55	£0.00	£0.00	£0.00	£2.02	£0.00	£0.31	£4.17	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£77.65	£14.19	£91.83		
Other Centres	£3.86	£1.22	£14.68	£5.32	£6.42	£1.23	£1.02	£2.25	£10.95	£0.00	£0.00	£1.08	£0.12	£0.00	£0.36	£0.10	£0.58	£0.04	£0.00	£0.00	£0.00	£2.06	£0.00	£0.00	£0.61	£51.88	£0.00	£51.88		
Retail Parks	£33.65	£6.64	£35.03	£6.46	£2.24	£2.45	£17.82	£9.45	£62.00	£11.89	£10.15	£7.59	£2.18	£9.34	£4.22	£4.16	£2.49	£3.86	£4.72	£5.97	£7.09	£18.27	£15.31	£9.33	£8.19	£300.51	£0.00	£300.51		
Supermarkets	£0.87	£0.37	£0.00	£0.59	£0.16	£0.00	£3.51	£0.24	£6.09	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.67	£2.79	£0.56	£16.86	£0.00	£16.86
Standalone Retail Warehouses	£0.96	£1.90	£4.49	£2.02	£0.95	£0.50	£1.05	£0.48	£1.84	£0.00	£0.00	£0.00	£0.04	£0.13	£0.11	£0.13	£0.12	£0.27	£0.00	£0.00	£0.21	£0.35	£0.80	£0.62	£0.91	£17.86	£0.00	£17.86		
Other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.69	£0.15	£0.05	£0.02	£0.00	£0.67	£0.30	£0.02	£0.41	£0.00	£0.00	£0.93	£0.09	£2.52	£0.80	£2.45	£9.11	£0.00	£9.11		
MGDOV	£12.04	£5.07	£12.04	£6.33	£4.43	£2.53	£3.80	£1.90	£7.60	£1.27	£2.53	£1.90	£0.63	£2.53	£1.90	£1.27	£0.63	£1.27	£1.27	£1.90	£1.90	£3.17	£3.80	£3.80	£3.17	£88.69	£38.01	£126.70		
Total Within Study Area	£182.56	£63.42	£261.82	£95.48	£100.00	£82.87	£109.49	£39.17	£248.06	£73.84	£50.72	£42.58	£12.78	£47.04	£31.28	£21.32	£17.27	£29.69	£29.89	£48.85	£57.17	£73.63	£68.35	£79.18	£60.29	£1,926.76	£266.10	£2,192.86		
Other Centres / Stores Outside of Study Area	£28.50	£19.28	£24.72	£25.88	£78.77	£69.80	£25.01	£11.07	£36.30	£10.56	£10.70	£3.56	£2.65	£21.89	£4.59	£2.82	£1.24	£10.11	£3.47	£8.51	£13.19	£26.52	£5.75	£4.70	£9.23	£458.83	£0.00	£458.83		
TOTAL	£211.06	£82.71	£286.54	£121.35	£178.77	£152.67	£134.50	£50.24	£284.36	£84.40	£61.43	£46.14	£15.44	£68.94	£35.87	£24.14	£18.51	£39.80	£33.36	£57.36	£70.36	£100.14	£74.10	£83.88	£69.52	£2,385.59	£266.10	£2,651.69		

Notes:

1. Residual turnovers at 2020 are calculated by applying diversions on clothing and footwear, and personal / luxury goods spend to MGDOV. Diversions are based on GVA judgement, having regard to the location, scale and type of retail offer likely to be achieved and its influence over shopping patterns as informed by household survey data.

Table 8a. Turnover of Commitments

	Gross Floorspace (sq m)	Comparison Net Sales Floorspace (sq m)	2020 (£m)	2022 (£m)
Friarsgate, Lichfield	20,754	14,528	£97.22	£101.95
Mander Centre, Wolverhampton	8,608	6,026	£32.40	£33.98
Riverside, Stafford	22,570	15,200	£81.74	£85.71
Old Square, Walsall (Phase I)	4,347	3,043	£17.09	£17.92
Old Square, Walsall (Phase II & III)	2,541	964	£5.18	£5.44
St Matthew's Quarter, Walsall	4,540	3,178	£17.09	£17.92
Grand Central, Birmingham	32,163	22,514	£161.43	£169.27
Resorts World, Solihull	14,210	9,595	£68.80	£72.14

Notes:

1. Friarsgate comparison gross floorspace taken from Planning Application Ref. 08/00107/FUL.
2. Mander Centre comparison gross floorspace taken from Planning Application Ref. 14/00310/FUL.
3. Riverside comparison gross floorspace taken from Planning Application Ref. 13/18318/FUL.
4. Old Square Phases I, II & III comparison gross floorspace taken from Planning Application Refs. 11/0560/FUL and 14/1886/FUL.
5. St Matthew's Quarter comparison gross floorspace taken from Planning Application Ref. 13/1421/FUL (net uplift only).
6. Grand Central comparison gross floorspace taken from Planning Application Ref. 2011/02869/PA.
7. Resorts World comparison gross floorspace taken from Planning Application Ref. PL/2011/01815/OLM.
8. Net sales areas are GVA estimates unless otherwise explicitly stated within the relevant planning application.
9. Sales densities informed by data from applicants where available, and GVA judgement.
10. Turnovers projected forward by making allowances for trading efficiency improvements in accordance with the rates set out in Experian Retail Planner Briefing Note 12.1, Figure 4b.
11. 2013 Prices.

Table 8b. Trade Draw of Commitments (2020)

Friarsgate, Lichfield	Zone																									Inflow	Total	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25			
Draw from Zones (€m)	€1.26	€13.89	€5.78	€4.71	€8.98	€51.35	€5.25	€0.00	€0.54	€0.00	€0.09	€0.00	€0.30	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€0.22	€4.86	€97.22	
Draw from Zones (%)	1.3%	14.3%	5.9%	4.8%	9.2%	52.8%	5.4%	0.0%	0.6%	0.0%	0.1%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	5.0%	100.0%	
Market Share (%)	0.6%	16.8%	2.0%	3.9%	5.0%	33.6%	3.9%	0.0%	0.2%	0.0%	0.2%	0.0%	1.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%			
Mander Centre, Wolverhampton	Zone																									Inflow	Total	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Draw from Zones (€m)	€0.37	€0.02	€1.25	€0.03	€0.00	€0.00	€0.04	€0.22	€7.01	€3.52	€0.03	€0.15	€0.00	€0.02	€1.33	€0.88	€0.46	€0.96	€1.36	€2.44	€2.84	€0.30	€0.02	€0.05	€0.03	€9.07	€32.40	
Draw from Zones (%)	1.1%	0.1%	3.9%	0.1%	0.0%	0.0%	0.1%	0.7%	21.6%	10.8%	0.1%	0.5%	0.0%	0.1%	4.1%	2.7%	1.4%	2.9%	4.2%	7.5%	8.8%	0.9%	0.1%	0.1%	0.1%	28.0%	100.0%	
Market Share (%)	0.2%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.4%	2.5%	4.2%	0.0%	0.3%	0.0%	0.0%	3.7%	3.7%	2.5%	2.4%	4.1%	4.3%	4.0%	0.3%	0.0%	0.1%	0.0%			
Riverside, Stafford	Zone																									Inflow	Total	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Draw from Zones (€m)	€3.65	€0.36	€0.00	€0.12	€0.00	€0.44	€9.88	€5.03	€0.00	€0.00	€0.00	€0.00	€0.00	€0.01	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€0.00	€15.14	€21.31	€13.46	€12.26	€81.74	
Draw from Zones (%)	4.5%	0.4%	0.0%	0.2%	0.0%	0.5%	12.1%	6.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	18.5%	26.1%	16.5%	15.0%	100.0%
Market Share (%)	1.7%	0.4%	0.0%	0.1%	0.0%	0.3%	7.3%	10.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	20.4%	25.4%	19.4%			
Old Square, Walsall (Phase I)	Zone																									Inflow	Total	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Draw from Zones (€m)	€0.98	€0.35	€5.01	€2.15	€0.55	€0.07	€0.15	€0.01	€0.40	€0.01	€1.69	€1.40	€0.42	€1.39	€0.00	€0.00	€0.18	€0.02	€0.02	€0.01	€0.00	€1.74	€0.02	€0.01	€0.01	€0.51	€17.09	
Draw from Zones (%)	5.7%	2.0%	29.3%	12.6%	3.2%	0.4%	0.9%	0.0%	2.3%	0.1%	9.9%	8.2%	2.4%	8.1%	0.0%	0.0%	1.0%	0.1%	0.1%	0.0%	0.0%	10.2%	0.1%	0.1%	0.1%	3.0%	100.0%	
Market Share (%)	0.5%	0.4%	1.7%	1.8%	0.3%	0.0%	0.1%	0.0%	0.1%	0.0%	2.8%	3.0%	2.7%	2.0%	0.0%	0.0%	1.0%	0.0%	0.1%	0.0%	0.0%	1.7%	0.0%	0.0%	0.0%			
Old Square, Walsall (Phase II & III)	Zone																									Inflow	Total	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Draw from Zones (€m)	€0.30	€0.11	€1.52	€0.65	€0.17	€0.02	€0.05	€0.00	€0.12	€0.00	€0.51	€0.42	€0.13	€0.42	€0.00	€0.00	€0.05	€0.00	€0.01	€0.00	€0.00	€0.53	€0.01	€0.00	€0.00	€0.16	€5.18	
Draw from Zones (%)	5.7%	2.0%	29.3%	12.6%	3.2%	0.4%	0.9%	0.0%	2.3%	0.1%	9.9%	8.2%	2.4%	8.1%	0.0%	0.0%	1.0%	0.1%	0.1%	0.0%	0.0%	10.2%	0.1%	0.1%	0.1%	3.0%	100.0%	
Market Share (%)	0.1%	0.1%	0.5%	0.5%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	0.9%	0.8%	0.6%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%			
St Matthew's Quarter, Walsall	Zone																									Inflow	Total	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Draw from Zones (€m)	€0.98	€0.35	€5.01	€2.15	€0.55	€0.07	€0.15	€0.01	€0.40	€0.01	€1.69	€1.40	€0.42	€1.39	€0.00	€0.00	€0.18	€0.02	€0.02	€0.01	€0.00	€1.74	€0.02	€0.01	€0.01	€0.51	€17.09	
Draw from Zones (%)	5.7%	2.0%	29.3%	12.6%	3.2%	0.4%	0.9%	0.0%	2.3%	0.1%	9.9%	8.2%	2.4%	8.1%	0.0%	0.0%	1.0%	0.1%	0.1%	0.0%	0.0%	10.2%	0.1%	0.1%	0.1%	3.0%	100.0%	
Market Share (%)	0.5%	0.4%	1.7%	1.8%	0.3%	0.0%	0.1%	0.0%	0.1%	0.0%	2.8%	3.0%	2.7%	2.0%	0.0%	0.0%	1.0%	0.0%	0.1%	0.0%	0.0%	1.7%	0.0%	0.0%	0.0%			
Grand Central, Birmingham	Zone																									Inflow	Total	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Draw from Zones (€m)	€1.54	€0.16	€1.42	€1.13	€3.86	€1.03	€0.80	€0.13	€0.80	€0.47	€1.00	€0.32	€0.24	€1.46	€0.23	€0.11	€0.08	€0.10	€0.05	€0.38	€0.17	€0.29	€0.12	€0.02	€0.23	€145.29	€161.43	
Draw from Zones (%)	1.0%	0.1%	0.9%	0.7%	2.4%	0.6%	0.5%	0.1%	0.5%	0.3%	0.6%	0.2%	0.2%	0.9%	0.1%	0.1%	0.0%	0.1%	0.2%	0.1%	0.2%	0.1%	0.0%	0.1%	0.1%	90.0%	100.0%	
Market Share (%)	0.7%	0.2%	0.5%	0.9%	2.2%	0.7%	0.6%	0.3%	0.3%	0.6%	1.6%	0.7%	1.6%	2.1%	0.6%	0.4%	0.4%	0.3%	0.1%	0.7%	0.2%	0.3%	0.2%	0.0%	0.3%			
Resorts World, Solihull	Zone																									Inflow	Total	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Draw from Zones (€m)	€0.42	€0.43	€0.43	€0.55	€1.60	€1.03	€0.33	€0.26	€0.30	€0.17	€0.41	€0.26	€0.27	€0.18	€0.17	€0.09	€0.09	€0.09	€0.00	€0.15	€0.09	€0.26	€0.50	€0.34	€0.21	€60.20	€68.80	
Draw from Zones (%)	0.6%	0.6%	0.6%	0.8%	2.3%	1.5%	0.5%	0.4%	0.4%	0.3%	0.6%	0.4%	0.4%	0.3%	0.3%	0.1%	0.1%	0.1%	0.0%	0.2%	0.1%	0.4%	0.7%	0.5%	0.3%	87.5%	100.0%	
Market Share (%)	0.2%	0.5%	0.2%	0.5%	0.9%	0.7%	0.2%	0.5%	0.1%	0.2%	0.7%	0.6%	1.7%	0.3%	0.5%	0.4%	0.5%	0.2%	0.0%	0.3%	0.1%	0.3%	0.7%	0.4%	0.3%			

Notes:

1. Trade draw for Birmingham, Lichfield, Stafford, Walsall and Wolverhampton commitments based on established market shares for those centres as informed by relevant household survey data.
2. Trade draw for Resorts World is informed by the applicant's Retail & Leisure Assessment and GVA judgement.

Table 10a. Turnover with MGDOV & All Commitments - Excluding Town Centre Uplifts (2020)

Within Study Area	Zones																									Total From Study Area (£m)	Inflow £m	Total £m	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Walsall	E17.37	E5.04	E91.74	E37.73	E9.90	E0.76	E2.49	E0.06	E6.96	E0.22	E30.26	E25.29	E7.12	E25.26	E0.00	E0.00	E3.31	E0.27	E0.29	E0.13	E0.00	E32.41	E0.25	E0.08	E0.16	E297.13	E10.75	E307.88	
Wolverhampton	E4.76	E0.14	E17.09	E0.20	E0.00	E0.00	E0.52	E2.94	E110.20	E55.68	E0.30	E1.87	E0.04	E0.09	E19.89	E13.21	E6.91	E14.92	E20.96	E37.61	E44.07	E4.37	E0.23	E0.29	E0.26	E356.55	E152.65	E509.20	
Lichfield	E1.10	E11.37	E6.03	E4.63	E9.51	E43.38	E5.19	E0.00	E0.55	E0.00	E0.05	E0.00	E0.28	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.13	E82.21	E6.08	E88.29	
Stafford	E8.93	E0.70	E0.00	E0.19	E0.00	E0.55	E23.72	E11.89	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.04	E0.00	E0.00	E0.00	E0.00	E0.00	E0.18	E0.00	E32.45	E43.76	E30.48	E152.91	E35.81	E188.72
Burnswood	E0.10	E11.71	E0.23	E0.12	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E12.16	E0.00	E12.16	
Cannock	E79.82	E7.24	E21.12	E6.89	E0.89	E0.04	E5.04	E5.91	E8.73	E0.00	E0.15	E0.17	E0.14	E0.21	E0.00	E0.93	E0.00	E0.00	E0.00	E0.00	E0.07	E0.00	E0.77	E0.14	E1.74	E139.73	E8.60	E148.33	
Rugeley	E1.20	E1.38	E0.00	E0.00	E1.30	E5.60	E34.71	E0.09	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.25	E0.23	E2.79	E47.56	E0.00	E47.56	
Hednesford	E8.52	E0.23	E0.47	E0.00	E0.00	E0.00	E0.00	E1.87	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E11.08	E0.00	E11.08	
Wednesbury	E1.62	E0.00	E9.34	E2.72	E1.65	E0.00	E0.21	E0.00	E3.57	E0.00	E1.13	E1.39	E0.20	E1.15	E0.04	E0.15	E0.21	E0.14	E0.00	E0.60	E0.00	E8.63	E0.00	E0.15	E0.00	E32.89	E0.00	E32.89	
Bilston	E0.23	E0.00	E2.10	E0.00	E0.00	E0.00	E0.00	E0.11	E4.55	E1.45	E0.30	E0.06	E0.07	E0.41	E1.90	E0.30	E0.42	E7.79	E1.55	E0.52	E0.41	E0.86	E0.00	E0.00	E0.00	E23.02	E0.00	E23.02	
Willenhall	E0.25	E0.00	E21.69	E0.18	E0.00	E0.00	E0.00	E0.00	E0.65	E0.00	E0.00	E0.15	E0.06	E0.00	E0.48	E0.00	E1.58	E0.11	E0.05	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E25.21	E0.00	E25.21	
Wednesfield	E0.00	E0.00	E11.50	E0.00	E0.00	E0.00	E0.43	E16.51	E0.00	E0.00	E0.06	E0.00	E0.00	E0.53	E0.06	E0.18	E0.00	E0.00	E0.07	E0.09	E0.00	E0.00	E0.00	E0.00	E0.00	E29.43	E0.00	E29.43	
Aldridge	E0.14	E0.00	E0.38	E7.80	E0.00	E0.68	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.33	E1.01	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.49	E0.00	E0.00	E0.00	E0.00	E10.83	E0.00	E10.83	
Button Coldfield	E0.00	E0.33	E0.00	E6.49	E53.71	E0.57	E0.55	E0.00	E0.00	E0.00	E1.63	E0.00	E0.27	E3.65	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E67.20	E14.19	E81.39	
Other Centres	E3.86	E1.22	E13.99	E4.93	E6.17	E1.23	E1.02	E2.05	E10.92	E0.00	E0.00	E1.07	E0.12	E0.00	E0.36	E0.10	E0.56	E0.04	E0.00	E0.00	E0.00	E1.94	E0.00	E0.00	E0.61	E50.17	E0.00	E50.17	
Retail Parks	E33.02	E5.92	E32.42	E6.12	E2.24	E2.14	E15.87	E8.56	E60.05	E11.42	E9.58	E7.07	E2.04	E8.83	E4.06	E4.05	E2.40	E3.81	E4.56	E5.75	E6.89	E17.48	E11.52	E6.27	E5.93	E278.01	E0.00	E278.01	
Supermarkets	E0.87	E0.37	E0.00	E0.59	E0.16	E0.00	E3.47	E0.24	E6.09	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E1.50	E2.79	E0.56	E16.64	E0.00	E16.64	
Standalone Retail Warehouses	E0.96	E1.90	E4.49	E2.02	E0.95	E0.50	E1.05	E0.48	E1.84	E0.00	E0.00	E0.00	E0.04	E0.13	E0.11	E0.13	E0.12	E0.27	E0.00	E0.00	E0.21	E0.35	E0.80	E0.62	E0.91	E17.86	E0.00	E17.86	
Other	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.00	E0.69	E0.15	E0.05	E0.02	E0.00	E0.67	E0.30	E0.02	E0.41	E0.00	E0.93	E0.09	E2.52	E0.80	E2.45	E9.11	E9.11	E0.00	E9.11	
MGDOV	E12.04	E5.07	E12.04	E6.33	E4.43	E2.53	E3.80	E1.90	E7.60	E1.27	E2.53	E1.90	E0.63	E2.53	E1.27	E0.63	E1.27	E1.27	E1.27	E1.90	E1.90	E3.17	E3.80	E3.80	E3.17	E88.69	E38.01	E126.70	
Town Centre Commitments (Market Share Uplifts)	E7.53	E15.08	E18.57	E9.80	E10.24	E51.95	E15.52	E5.26	E8.46	E3.55	E4.02	E3.37	E1.27	E3.22	E1.35	E0.88	E0.87	E0.99	E1.40	E2.46	E2.91	E4.32	E15.21	E21.39	E13.75	E223.36	E27.38	E250.73	
Total Within Study Area	E182.32	E67.70	E263.19	E96.74	E101.16	E109.93	E113.16	E39.93	E248.57	E74.28	E50.12	E42.45	E12.62	E46.49	E31.32	E21.36	E17.22	E30.02	E30.08	E48.97	E57.64	E74.20	E69.31	E80.05	E62.94	E1,971.76	E293.47	E2,265.23	
Other Centres / Stores Outside of Study Area	E26.78	E14.42	E21.50	E22.94	E72.15	E40.68	E20.21	E9.92	E34.69	E9.48	E9.90	E3.11	E2.30	E20.81	E4.16	E2.59	E1.13	E9.60	E3.23	E7.85	E12.45	E25.39	E4.18	E3.47	E6.13	E389.08	E0.00	E389.08	
Grand Central & Resorts World	E1.96	E0.59	E1.85	E1.67	E5.46	E2.06	E1.13	E0.39	E1.10	E0.64	E1.41	E0.58	E0.51	E1.64	E0.40	E0.19	E0.16	E0.19	E0.05	E0.54	E0.26	E0.54	E0.62	E0.37	E0.45	E24.75	E0.00	E24.75	
TOTAL	E211.06	E82.71	E286.54	E121.35	E178.77	E152.67	E134.50	E50.24	E284.36	E84.40	E61.43	E46.14	E15.44	E68.94	E35.87	E24.14	E18.51	E39.80	E33.36	E57.36	E70.36	E100.14	E74.10	E83.88	E69.52	E2,385.58	E293.47	E2,679.06	

Table 10b. Turnover with MGDOV & All Commitments - Including Town Centre Uplifts (2020)

Within Study Area	Zones																									Total From Study Area (€m)	Inflow €m	Total €m	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25				
Walsall	£19.63	£5.94	£103.27	£42.68	£11.16	£0.92	£2.84	£0.07	£7.88	£0.25	£34.17	£28.52	£8.08	£28.46	£0.00	£0.00	£3.73	£0.31	£0.33	£0.15	£0.00	£36.42	£0.30	£0.11	£0.19	£335.32	£11.93	£347.25	
Wolverhampton	£5.13	£0.16	£18.35	£0.23	£0.00	£0.00	£0.56	£3.16	£117.21	£59.20	£0.33	£2.01	£0.04	£0.11	£21.23	£14.09	£7.36	£15.87	£22.32	£40.05	£46.91	£4.67	£0.26	£0.34	£0.29	£379.88	£161.73	£541.61	
Lichfield	£2.36	£25.26	£11.81	£9.34	£18.48	£94.73	£10.44	£0.00	£1.09	£0.00	£0.14	£0.00	£0.58	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£174.57	£10.94	£185.52	
Stafford	£12.58	£1.07	£0.00	£0.32	£0.00	£0.99	£33.60	£16.92	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£222.39	£43.95	£270.46	
Burnwood	£0.10	£11.71	£0.23	£0.12	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£12.16	£0.00	£12.16	
Cannock	£19.82	£7.24	£21.12	£6.89	£0.89	£0.04	£5.04	£5.91	£8.73	£0.00	£0.15	£0.17	£0.14	£0.21	£0.00	£0.93	£0.00	£0.00	£0.00	£0.00	£0.00	£0.07	£0.00	£0.77	£-0.14	£1.74	£139.73	£8.60	£148.33
Rugeley	£1.20	£1.38	£0.00	£0.00	£1.30	£5.60	£34.71	£0.09	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.25	£0.23	£2.79	£47.56	£0.00	£47.56
Hednesford	£8.52	£0.23	£0.47	£0.00	£0.00	£0.00	£0.00	£0.00	£1.87	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£11.08	£0.00	£11.08	
Wednesbury	£1.62	£0.00	£9.34	£2.72	£1.65	£0.00	£0.21	£0.00	£3.57	£0.00	£1.13	£1.39	£0.20	£1.15	£0.04	£0.15	£0.21	£0.14	£0.00	£0.60	£0.00	£8.63	£0.00	£0.15	£0.00	£32.89	£0.00	£32.89	
Bilston	£0.23	£0.00	£2.10	£0.00	£0.00	£0.00	£0.00	£0.11	£4.55	£1.45	£0.30	£0.06	£0.07	£0.41	£1.90	£0.30	£0.42	£7.79	£1.55	£0.52	£0.41	£0.86	£0.00	£0.00	£0.00	£23.02	£0.00	£23.02	
Willenhall	£0.25	£0.00	£21.69	£0.18	£0.00	£0.00	£0.00	£0.00	£0.65	£0.00	£0.00	£0.15	£0.06	£0.00	£0.48	£0.00	£1.58	£0.11	£0.05	£0.00	£0.00	£0.00	£0.00	£0.00	£25.21	£0.00	£25.21		
Wednesfield	£0.00	£0.00	£11.50	£0.00	£0.00	£0.00	£0.43	£16.51	£0.00	£0.00	£0.06	£0.00	£0.00	£0.53	£0.06	£0.18	£0.00	£0.00	£0.00	£0.00	£0.07	£0.09	£0.00	£0.00	£0.00	£29.43	£0.00	£29.43	
Aldridge	£0.14	£0.00	£0.38	£7.80	£0.00	£0.68	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.33	£1.01	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.49	£0.00	£0.00	£0.00	£10.83	£0.00	£10.83	
Sutton Coldfield	£0.00	£0.33	£0.00	£6.49	£53.71	£0.57	£0.55	£0.00	£0.00	£0.00	£1.63	£0.00	£0.27	£3.65	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£67.20	£14.19	£81.39	
Other Centres	£3.86	£1.22	£13.99	£4.93	£6.17	£1.23	£1.02	£2.05	£10.92	£0.00	£0.00	£1.07	£0.12	£0.00	£0.36	£0.10	£0.56	£0.04	£0.00	£0.00	£0.00	£1.94	£0.00	£0.00	£0.61	£50.17	£0.00	£50.17	
Retail Parks	£33.02	£5.92	£32.42	£6.12	£2.24	£2.14	£15.87	£8.56	£60.05	£11.42	£9.58	£7.07	£2.04	£8.83	£4.06	£4.05	£2.40	£3.81	£4.56	£5.75	£6.89	£17.48	£11.52	£6.27	£5.93	£278.01	£0.00	£278.01	
Supermarkets	£0.87	£0.37	£0.00	£0.59	£0.16	£0.00	£3.47	£0.24	£6.09	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£16.64	£0.00	£16.64	
Standalone Retail Warehouses	£0.96	£1.90	£4.49	£2.02	£0.95	£0.50	£1.05	£0.48	£1.84	£0.00	£0.00	£0.00	£0.04	£0.13	£0.11	£0.13	£0.12	£0.27	£0.00	£0.00	£0.21	£0.35	£0.80	£0.62	£0.91	£17.86	£0.00	£17.86	
Other	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.69	£0.15	£0.05	£0.02	£0.00	£0.67	£0.30	£0.02	£0.41	£0.00	£0.93	£0.09	£2.52	£0.80	£2.45	£9.11	£0.00	£9.11		
MGDOV	£12.04	£5.07	£12.04	£6.33	£4.43	£2.53	£3.80	£1.90	£7.60	£1.27	£2.53	£1.90	£0.63	£2.53	£1.90	£1.27	£0.63	£1.27	£1.27	£1.90	£1.90	£3.17	£3.80	£3.80	£3.17	£88.69	£38.01	£126.70	
Total Within Study Area	£182.32	£67.70	£263.19	£96.74	£101.16	£109.93	£113.16	£39.93	£248.57	£74.28	£50.12	£42.45	£12.62	£46.49	£31.32	£21.36	£17.22	£30.02	£30.08	£48.97	£57.64	£74.20	£69.31	£80.05	£62.94	£1,971.76	£293.47	£2,265.23	
Other Centres / Stores Outside of Study Area	£26.78	£14.42	£21.50	£22.94	£72.15	£40.68	£20.21	£9.92	£34.69	£9.48	£9.90	£3.11	£2.30	£20.81	£4.16	£2.59	£1.13	£9.60	£3.23	£7.85	£12.45	£25.39	£4.18	£3.47	£6.13	£389.08	£0.00	£389.08	
Grand Central & Resorts World	£1.96	£0.59	£1.85	£1.67	£5.46	£2.06	£1.13	£0.39	£1.10	£0.64	£1.41	£0.58	£0.51	£1.64	£0.40	£0.19	£0.16	£0.19	£0.05	£0.54	£0.26	£0.54	£0.62	£0.37	£0.45	£24.75	£0.00	£24.75	
TOTAL	£211.06	£82.71	£286.54	£121.35	£178.77	£152.67	£134.50	£50.24	£284.36	£84.40	£61.43	£46.14	£15.44	£68.94	£35.87	£24.14	£18.51	£39.80	£33.36	£57.36	£70.36	£100.14	£74.10	£83.88	£69.52	£2,385.58	£293.47	£2,679.06	

Table 11. Trade Diversions (2020)

	MGDOV	Friarsgate	Mander Centre	Riverside	Old Square & St Matthew's Quarter	Grand Central	Resorts World	Total
	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)
Walsall	£18.30	£7.19	£1.77	£1.31	£16.41	£3.97	£1.48	£50.44
Wolverhampton	£14.73	£0.97	£11.44	£1.50	£3.51	£2.39	£1.45	£35.99
Lichfield	£4.50	£24.66	£0.01	£1.14	£0.98	£1.62	£0.44	£33.35
Stafford	£11.04	£2.28	£0.25	£34.52	£0.37	£0.73	£0.84	£50.03
Burntwood	£0.10	£0.38	£0.00	£0.00	£0.00	£0.00	£0.00	£0.48
Cannock	£8.21	£5.10	£0.67	£5.68	£2.41	£1.23	£0.42	£23.72
Rugeley	£0.89	£1.46	£0.00	£3.02	£0.13	£0.14	£0.10	£5.74
Hednesford	£0.05	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.05
Wednesbury	£0.23	£0.00	£0.09	£0.00	£0.29	£0.00	£0.00	£0.61
Bilston	£0.10	£0.00	£0.19	£0.00	£0.05	£0.00	£0.00	£0.35
Willenhall	£0.11	£0.00	£0.09	£0.00	£0.18	£0.00	£0.00	£0.39
Wednesfield	£0.23	£0.03	£0.24	£0.00	£0.09	£0.00	£0.00	£0.58
Aldridge	£0.06	£0.06	£0.00	£0.01	£0.15	£0.01	£0.00	£0.29
Sutton Coldfield	£2.74	£5.55	£0.00	£0.01	£1.27	£2.58	£1.03	£13.18

Table 12. Solus Impact of MGDOV

Within Study Area	Total Turnover (£m)		Diversion to MGDOV (£m)	Residual Turnover (£m) 2020	Impact %
	2015	2020			
Walsall	£314.68	£358.32	-£18.30	£340.02	-5.1%
Wolverhampton	£483.44	£545.19	-£14.73	£530.46	-2.7%
Lichfield	£107.34	£121.64	-£4.50	£117.14	-3.7%
Stafford	£211.24	£238.76	-£11.04	£227.72	-4.6%
Burntwood	£11.21	£12.64	-£0.10	£12.54	-0.8%
Cannock	£150.97	£172.05	-£8.21	£163.84	-4.8%
Rugeley	£47.30	£53.30	-£0.89	£52.42	-1.7%
Hednesford	£9.77	£11.14	-£0.05	£11.08	-0.5%
Wednesbury	£29.27	£33.50	-£0.23	£33.27	-0.7%
Bilston	£20.54	£23.36	-£0.10	£23.27	-0.4%
Willenhall	£22.65	£25.60	-£0.11	£25.48	-0.4%
Wednesfield	£26.58	£30.02	-£0.23	£29.79	-0.8%
Aldridge	£9.86	£11.13	-£0.06	£11.07	-0.5%
Sutton Coldfield	£82.79	£94.57	-£2.74	£91.83	-2.9%
Other Centres	£46.97	£52.86	-£0.97	£51.88	-1.8%
Retail Parks	£269.85	£307.61	-£7.10	£300.51	-2.3%
Supermarkets	£15.04	£16.88	-£0.02	£16.86	-0.1%
Standalone Retail Warehouses	£15.59	£17.86	£0.00	£17.86	0.0%
Other	£8.14	£9.26	-£0.15	£9.11	-1.6%
MGDOV	£0.00	£0.00	£0.00	£126.70	0.0%
Total Within Study Area	£1,883.21	£2,135.69	-£69.53	£2,192.86	0.0%
Other Centres / Stores Outside of Study Area	£403.52	£477.99	-£19.16	£458.83	-4.0%
TOTAL	£2,286.73	£2,613.68	-£88.69	£2,651.69	

Table 13a. Cumulative Impact of MGDOV and Commitments - Excluding Town Centre Uplifts

Within Study Area	Total Turnover (£m)		Diversion to MGDOV (£m)	Diversion to Commitments (£m)	Residual Turnover (£m) 2020	Impact %
	2015	2020				
Walsall	£314.68	£358.32	-£18.30	-£32.14	£307.88	-14.1%
Wolverhampton	£483.44	£545.19	-£14.73	-£21.26	£509.20	-6.6%
Lichfield	£107.34	£121.64	-£4.50	-£28.85	£88.29	-27.4%
Stafford	£211.24	£238.76	-£11.04	-£39.00	£188.72	-21.0%
Burntwood	£11.21	£12.64	-£0.10	-£0.38	£12.16	-3.8%
Cannock	£150.97	£172.05	-£8.21	-£15.51	£148.33	-13.8%
Rugeley	£47.30	£53.30	-£0.89	-£4.85	£47.56	-10.8%
Hednesford	£9.77	£11.14	-£0.05	£0.00	£11.08	-0.5%
Wednesbury	£29.27	£33.50	-£0.23	-£0.39	£32.89	-1.8%
Bilston	£20.54	£23.36	-£0.10	-£0.25	£23.02	-1.5%
Willenhall	£22.65	£25.60	-£0.11	-£0.28	£25.21	-1.5%
Wednesfield	£26.58	£30.02	-£0.23	-£0.35	£29.43	-1.9%
Aldridge	£9.86	£11.13	-£0.06	-£0.24	£10.83	-2.7%
Sutton Coldfield	£82.79	£94.57	-£2.74	-£10.44	£81.39	-13.9%
Other Centres	£46.97	£52.86	-£0.97	-£1.72	£50.17	-5.1%
Retail Parks	£269.85	£307.61	-£7.10	-£22.50	£278.01	-9.6%
Supermarkets	£15.04	£16.88	-£0.02	-£0.22	£16.64	-1.4%
Standalone Retail Warehouses	£15.59	£17.86	£0.00	£0.00	£17.86	0.0%
Other	£8.14	£9.26	-£0.15	£0.00	£9.11	-1.6%
MGDOV	£0.00	£0.00	£0.00	£0.00	£126.70	0.0%
Town Centre Commitments (Market Share Uplifts)	£0.00	£0.00	£0.00	£0.00	£250.73	0.0%
Total Within Study Area	£1,883.21	£2,135.69	-£69.53	-£178.37	£2,265.23	-11.6%
Other Centres / Stores Outside of Study Area	£403.52	£477.99	-£19.16	-£69.75	£389.08	-18.6%
Grand Central & Resorts World	£0.00	£0.00	£0.00	£0.00	£24.75	0.0%
TOTAL	£2,286.73	£2,613.68	-£88.69	-£248.11	£2,679.06	

Table 13b. Cumulative Impact of MGDOV and Commitments - Including Town Centre Uplifts

Within Study Area	Total Turnover (£m)		Diversion to MGDOV & Commitments (£m)	Net Difference with Town Centre Commitments (£m)	Residual Turnover (£m) 2020	Impact %
	2015	2020				
Walsall	£314.68	£358.32	£-50.44	£-11.07	£347.25	-3.1%
Wolverhampton	£483.44	£545.19	£-35.99	£-3.58	£541.61	-0.7%
Lichfield	£107.34	£121.64	£-33.35	£63.88	£185.52	52.5%
Stafford	£211.24	£238.76	£-50.03	£31.71	£270.46	13.3%
Burntwood	£11.21	£12.64	£-0.48	£0.00	£12.16	-3.8%
Cannock	£150.97	£172.05	£-23.72	£0.00	£148.33	-13.8%
Rugeley	£47.30	£53.30	£-5.74	£0.00	£47.56	-10.8%
Hednesford	£9.77	£11.14	£-0.05	£0.00	£11.08	-0.5%
Wednesbury	£29.27	£33.50	£-0.61	£0.00	£32.89	-1.8%
Bilston	£20.54	£23.36	£-0.35	£0.00	£23.02	-1.5%
Willenhall	£22.65	£25.60	£-0.39	£0.00	£25.21	-1.5%
Wednesfield	£26.58	£30.02	£-0.58	£0.00	£29.43	-1.9%
Aldridge	£9.86	£11.13	£-0.29	£0.00	£10.83	-2.7%
Sutton Coldfield	£82.79	£94.57	£-13.18	£0.00	£81.39	-13.9%
Other Centres	£46.97	£52.86	£-2.69	£0.00	£50.17	-5.1%
Retail Parks	£269.85	£307.61	£-29.60	£0.00	£278.01	-9.6%
Supermarkets	£15.04	£16.88	£-0.24	£0.00	£16.64	-1.4%
Standalone Retail Warehouses	£15.59	£17.86	£0.00	£0.00	£17.86	0.0%
Other	£8.14	£9.26	£-0.15	£0.00	£9.11	-1.6%
MGDOV	£0.00	£0.00	£0.00	£0.00	£126.70	0.0%
Total Within Study Area	£1,883.21	£2,135.69	£-247.89	£80.93	£2,265.23	6.1%
Other Centres / Stores Outside of Study Area	£403.52	£477.99	£-88.91	£0.00	£389.08	-18.6%
Grand Central & Resorts World	£0.00	£0.00	£0.00	£0.00	£24.75	0.0%
TOTAL	£2,286.73	£2,613.68	£-336.80	£80.93	£2,679.06	