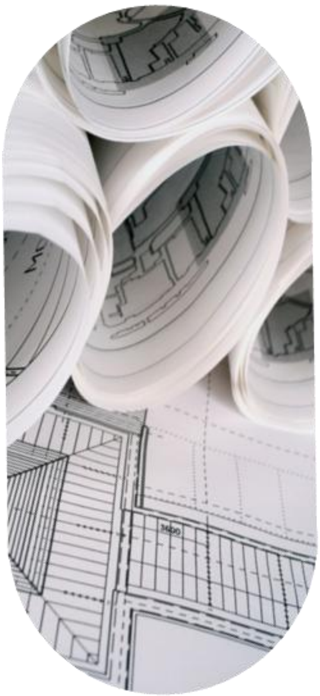
Planning Appeal in respect of Land North of A507, West of A10, Buntingford

Planning Rebuttal Proof of Evidence of Gary Stephens on behalf of the Appellant (Hallam Land Management Limited)

Application Reference: 3/24/0966/OUT
Planning Inspectorate Reference: 6008238



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1. INTRODUCTION

1.1 At paragraph 6.15 of Mr Phillips proof of evidence, he states that he has difficulty affording weight to the local centre due to the lack of clarity on what will be accommodated in the centre and any evidence pertaining to the viability of such provision.

1.2 In response, the Appellant has prepared the attached note at Appendix One which calculates how much commercial floorspace could reasonably be supported within the Local Centre based on the level of expenditure generated by the new resident population and the proportion of that expenditure expected to be retained locally.

1.3 This viability evidence is in addition to the market interest in the delivery of the local centre previously provided at CD5.22 and CD 5.23.

APPENDIX 1 – LOCAL CENTRE CAPACITY ASSESSMENT

Marrons

Land North of A507, West of A10, Buntingford

Local Centre Capacity Assessment

Introduction

1.1. This Local Centre Capacity Assessment ('the Assessment') has been prepared by Marrons (part of Shakespeare Martineau LLP) on behalf of Hallam Land Management Ltd ('Hallam Land') in relation to their proposals for Land North of A507, West of A10, Buntingford (3/24/0966/OUT) ('the Proposed Development'):

"Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access".

1.2. The purpose of the Assessment is to determine the amount of commercial floorspace (i.e. convenience retail, comparison retail and non-retail floorspace) that could reasonably be supported within the Proposed Development's Local Centre based on the level of expenditure generated by the new resident population and the proportion of that expenditure expected to be retained locally.

Capacity Assessment

1.3. Marrons has undertaken a series of calculations to complete the Assessment. These calculations and the implications for the Proposed Development are set out below.

Future Population

1.4. The Proposed Development comprises up to 600 residential dwellings alongside a further 60 older person accommodation units.

1.5. Marrons has firstly estimated the number of residents this accommodation might host drawing on Census (2021) data, which indicates that the average household size in East Hertfordshire is 2.4 people.

1.6. Using this as a basis, it is estimated that the new accommodation could support up to 1,584 residents in total.

Annual Expenditure

1.7. Marrons has secondly estimated the total amount of convenience and comparison retail expenditure these residents could support per annum. This draws on the following expenditure per capita figures for Buntingford as set out in the recently published East Hertfordshire Retail and Town Centres Study (2026)[1]:

- **Convenience:** £2,884 per annum.
- **Comparison:** £3,584 per annum.

These figures are based on data from Experian Retail Planner (2026) and exclude Special Forms of Trading (e.g. online shopping, mail order, market stalls etc).

1.8. Applying these benchmarks to the population estimate results in the following:

- **Convenience:** £4.57m per annum.
- **Comparison:** £5.68m per annum.

Retained Annual Expenditure

1.9. Marrons has thirdly estimated the level of expenditure that could be retained within the Proposed Development's Local Centre.

1.10. For convenience goods it is assumed that between 20 and 25% of expenditure could be retained. This is a relatively modest level of retention recognising that Buntingford already has a small collection of convenience operators within the town.

1.11. For comparison goods it is assumed that between 10 and 15% of expenditure could be retained. This is again a fairly modest level recognising that Buntingford already has a small number of comparison operators within the town, and that Stevenage and Letchworth Garden City are relatively close by.

1.12. Applying these assumptions to the total annual expenditure figures results in the following:

- **Convenience:** £0.91-1.14m per annum.
- **Comparison:** £0.57-0.85m per annum.

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[1] See Annex C Table 2 (Page 62).

This equates to around £1.48-1.99m in total per annum.

1.13. These assumptions are based on Marrons' professional judgement and understanding of retail assessments produced on behalf of local authorities across the country.

Floorspace Capacity

1.14. Marrons has fourthly estimated how much commercial floorspace could be accommodated in the Proposed Development's Local Centre based on available expenditure. This draws on the following sales density figures for Buntingford:

- **Convenience:** £6,500 per sqm.
  - This figure has been sourced from the East Hertfordshire Retail and Town Centres Study (2026)[2].
- **Comparison:** £2,748 per sqm.
  - This figure has been sourced from the East Hertfordshire Retail and Towns Centres Study Update (2013). No up-to-date information appears to be presented in the latest iteration of this evidence[3].

Sales density refers the amount of sales revenue generated per unit of floorspace.

1.15. Dividing total expenditure by these benchmarks results in the following net requirements:

- **Convenience:** 141-176 sqm or 1,518-1,894 sq ft net.
- **Comparison:** 207-310 sqm or 2,228-3,337 sq ft net.

This equates to a total of 348-486 sqm or 3,746-5,231 sq ft net convenience and comparison floorspace. Note that the sales density figures have been applied to *exact* annual expenditure figures rather than the rounded estimates previously referenced.

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[2] See Appendix C Table 27 (Page 77) under 'other convenience goods shops and stores'. This figure is considered conservative as it is higher than commonly used for smaller and local stores as highlighted in the East Hertfordshire Retail and Towns Centre Update (2013) which states that *"[a]n average sales density of £13,000 per sqm has been adopted for large food stores and **£5,000 per sqm for local shops**"*. The figure is, however, higher than adopted in the main body of the East Hertfordshire Retail and Town Centres Study (2026) for new 'generic' retail space but it is recognised that *"[s]ome operators would trade above this level **whilst other foodstores (and convenience shops) would trade below**"*.

[3] See Table 3.2 (Page 14). This figure is considered appropriate based on our understanding of local centres and the evidence available - it sits below the district average which is £4,806 which is appropriate given the modest size and scale of comparison retail in Buntingford. The figure has not been adjusted for inflation as the East Hertfordshire Retail and Town Centres Study (2026) does not make an *"allowance for an increase in the sales densities of convenience goods floorspace over the forecasting period"*.

1.16. Applying a net to gross ratio of 80% increases the position as follows:

- **Convenience:** 176-220 sqm or 1,894-2,368 sq ft gross.
- **Comparison:** 259-388 sqm or 2,788-4,176 sq ft gross.

1.17. This equates to a total of 435-608 sqm or 4,682-6,544 sq ft gross convenience and comparison floorspace. All of these calculations are set out in Table 1 below.

Table 1 Convenience and Comparison Floorspace Capacity (Central Scenario)

Method Step	Convenience	Comparison
Number of homes to be provided	660	
Average household size in district	2.4	
Estimated total population	**1,584**	
Spending per head of population	£2,884	£3,584
Total potential available spend	**£4,568,256**	**£5,677,056**
Level of retention applied	20-25%	10-15%
Total potential retained spend	£913,651 to £1,142,064	£567,706 to £851,558
Sales density benchmarks	£6,500	£2,748
Floorspace need (net) sqm	141 to 176	207 to 310
Floorspace need (gross) sqm	176 to 220	259 to 388
Grand Total (gross) sqm	435 to 608	

Source: Marrons

1.18. In terms of non-retail floorspace, there is no prescribed method or approach to determine an appropriate floorspace capacity. It is, however, known that non-retail operators occupy around 55% of floorspace in centres across the country on average[4].

1.19. On this basis, it may be reasonable to assume that a further 532-743 sqm or 5,726-7,998 sq ft gross could be occupied by non-retail operators in the Proposed Development's Local Centre – these could include:

- Food and beverage outlets, including cafes, restaurants, and public houses.
- Leisure services, such as sports, leisure and fitness facilities.
- Financial and business services, such as banks, agents, accountants, solicitors, architects etc.
- Retail services, such as dry cleaners, beauticians, opticians, hairdressers, physiotherapists, travel agents, dentists, veterinary surgeries, day nurseries etc.

1.20. This translates to a grand total of 967-1,351 sqm or 10,408-14,542 sq ft gross convenience, comparison and non-retail floorspace. The convenience and comparison figures are based on expenditure whereas the non-retail figures are not so should be treated indicatively.

Capacity Considerations

1.21. The Proposed Development makes an allowance for a 0.4 ha Local Centre which equates to around 2,000 sqm gross floorspace as set out in the Land North of A507, West of A10, Buntingford Economic Benefit Statement (2024).

1.22. The analysis set out above illustrates that commercial floorspace (i.e. convenience retail, comparison retail and non-retail floorspace) could occupy 967-1,351 sqm gross of this based on retained expenditure generated by new residents. The remaining floorspace could be used for non-commercial uses such as community, health and/or education provision as is the case for other residential schemes elsewhere in the country as set out below:

- **The Hub, Mulberry Park (Bath):** The Hub at Mulberry Park is a flagship local centre created by Curo as part of the regeneration of the former Ministry of Defence Foxhill site near Bath. Rather than relying on retail anchors, the scheme brings multiple community and cultural uses together under one roof, including a primary school, nursery, community centre and café. These facilities

[4] This is captured in the Herefordshire Town Centre and Retail Assessment (2022).

are co-located within a distinctive landmark building that fronts onto a landscaped public square with shared sports facilities positioned behind.

- **Chesterwell Plaza (Colchester):** Chesterwell Plaza serves as the neighbourhood centre for the Chesterwell development in Colchester, planned and delivered by Mersea Homes. Its layout is organised around a landscaped public plaza framed by a school and nursery, with residential units positioned above and around ground floor commercial spaces to support continuous activity.
- **Jubilee Park (Cambridge):** Jubilee Square is the focal point of Marleigh Park, a new neighbourhood developed by The Hill Group in Cambridge. It brings together community, retail and educational uses arranged around a central public space. The non-commercial uses include the Marleigh Community Centre, Monkey Puzzle Nursery and Marleigh Primary Academy.

1.23. Co-locating such uses together can often be beneficial for commercial operators as alternative uses encourage activation across the day and evening promoting linked trips. Alternatively, remaining land could be used for additional open space which can again act as a customer attractor for commercial operators if carefully designed, managed and equipped.

1.24. Marrons' view is that the success of the Local Centre will hinge on its ability to attract an anchor 'top up' foodstore operator as this will likely generate the footfall required to attract comparison and non-retail operators. The analysis presented above illustrates that retained resident expenditure should be able to support 176-220 sqm or 1,894-2,368 sq ft of convenience floorspace which *should* be sufficient to attract a secondary operator (e.g. Nisa, One Stop, Mace etc).

1.25. This position improves if the sales density figure is adjusted from £6,500 per sqm to £5,000 per sqm which is the benchmark Marrons typically adopts when considering small 'top up' food stores. This aligns with the East Hertfordshire Retail and Towns Centre Update (2013) which sets out the following:

- *"Average sales densities are not widely available for small convenience shops, particularly independent retailers. Based on the mix of shops present in each centre within the District and our experience of trading levels of small independent shops informed by household shopper surveys elsewhere,* ***we have adopted a sales density of £5,000 per sqm net for convenience shops/stores in the study area****. This is consistent with NLP's [Nathanial Lichfield and Partner's] experience of retail studies across the South and East of England"* (p.9).

1.26. This increases the amount of convenience floorspace that could be supported by retained resident expenditure to 229-285 sqm or 2,464-3,068 sq ft gross as set out in Table 2 below – this is comfortably above the floorspace threshold that secondary 'top up' food store operators typically seek (>185 sqm gross). When combined with the comparison and non-retail figures this increases the grand total for the Local Centre to 1,020-1,416 sqm and 10,979-15,242 sq ft gross.

1.27. It is important to note that all figures presented in this document purposefully exclude any inflow expenditure from existing residents or workers in Buntingford to ensure that the 'worst case' position is illustrated.

Table 2 Convenience and Comparison Floorspace Capacity (Alternative Scenario I)

Method Step	Convenience	Comparison
Number of homes to be provided	660	
Average household size in district	2.4	
Estimated total population	**1,584**	
Spending per head of population	£2,884	£3,584
Total potential available spend	**£4,568,256**	**£5,677,056**
Level of retention applied	20-25%	10-15%
Total potential retained spend	£913,651 to £1,142,064	£567,706 to £851,558
Sales density benchmarks	£5,000	£2,748
Floorspace need (net) sqm	183 to 228	207 to 310
Floorspace need (gross) sqm	229 to 285	259 to 388
Grand Total (gross) sqm	**488 to 673**	

Source: Marrons

Retail Impact

1.28. The calculations set out above illustrate that the residents of the Proposed Development will generate around £4.57m of expenditure on convenience goods and £5.68m on comparison goods per annum in total. Of this, between £0.91-1.14m convenience spending and £0.57-0.85m comparison spending is expected to be retained in the Proposed Development's Local Centre. The residual spending of residents will flow out to surrounding town centres and retail outlets, including Buntingford Town Centre, potentially having a positive impact on these locations.

Conclusion

1.29. This Assessment considers the level of convenience and comparison expenditure that could be generated by future residents of the Proposed Development and the proportion of that expenditure that may be retained within the proposed Local Centre.

1.30. This, alongside additional analysis, indicates that between 967 sqm and 1,351 sqm gross of commercial floorspace could be supported in total comprising convenience, comparison and non-retail uses. Under an alternative convenience sales density scenario, this increases to between 1,020 sqm and 1,416 sqm gross excluding inflow of expenditure from existing residents or workers.

1.31. These findings indicate that retained resident expenditure could support a significant proportion of the floorspace anticipated within the proposed 0.4 ha Local Centre, which is expected to provide approximately 2,000 sqm gross floorspace. This still allows flexibility for the inclusion of complementary non-commercial uses, such as community, health and educational provision or, alternatively, open space.

1.32. While the figures set out in this document appear relatively prescriptive, it is important to note that they are illustrative and provide a broad indication of the implications of resident expenditure on commercial floorspace. Marrons does, however, note that the retail market is currently in flux and recommends a flexible approach that allows the Local Centre to respond to changing market requirements and occupier demand.

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Produced For: Hallam Land Management Ltd.

Produced When: August 2026.

Note: This report has been prepared exclusively for the clients for the purpose agreed in our engagement. It is based on information provided by the client and other sources believed to be reliable at the time of preparation.

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