



**Trago Mills (Merthyr) Limited
Trago Mills, Merthyr Tydfil**

**Hearing Statement:
Retail Matters**

LPARef: 19/0144
Ref: AH/NR/190053/R0002v2
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1.0 Introduction and Background

1.1 This report is prepared by Mango Planning & Development Limited in relation to a enforcement appeal at Trago Mills, Swansea Road, Merthyr.

1.2 The appeal has been submitted by Stephens Scown LLP in relation to an enforcement notice issued by Merthyr Tydfil County Borough Council (“the LPA”) served on 8th January 2020 (Reference PE/19/0144).

1.3 The alleged breach of planning control is cited as being: “Without planning permission, unauthorised change of use of land for the siting of retail pitches”.

1.4 The reason listed for issuing the enforcement notice is stated as:

“The sales pitches have an unacceptable impact on existing businesses that undermines the viability and vitality of the Town Centre. There is no justification for the out of town location of the development. Therefore the location of the sales pitches is contrary to Policy AS18 of the Merthyr Tydfil Local Development Plan.”

1.5 This follows the refusal by the LPA on 28th September 2019 for a planning application for the ‘Change of use of land within the carpark to accommodate 2 No. sales pitches’ (LPA Reference: P/19/0173). The officer report and refusal notice are provided at **Appendix MP1**.

1.6 The LPA’s sole ground for objection to that application was:

“The proposal, by virtue of its out of town location, would undermine and cause unacceptable harm to the viability and vitality of the town centre, contrary to policy AS18 of the Merthyr Tydfil Local Development Plan”.

1.7 It is noted that in reaching this conclusion the LPA did not request that the applicant provide a retail impact assessment, nor did it undertake its own assessment of

impact. There is similarly no further assessment of impact undertaken by the LPA to inform its decision to proceed with enforcement action in this case.

- 1.8 The LPA's determination in both cases of unacceptable harm to the viability and vitality of the town centre is consequently not supported by any proper assessment.
- 1.9 To inform the Inspector's determination of this appeal therefore we provide below a consideration of impact, both in quantitative and qualitative terms.
- 1.10 This Statement also demonstrates how the proposal is compliant with other relevant retail planning tests.

Background

- 1.11 Trago Mills opened in April 2018 on the site of the former Heolgerrig Brickworks, just off the A470.
- 1.12 The main store extends to approximately 200,000 square feet (approximately 19,000 sq m) of retail floorspace, selling a wide range of discounted home and garden furniture, household goods, toys, books, sports goods, musical instruments, clothing and footwear.
- 1.13 In addition, a selection of cafes and food outlets, plus a range of smaller independent retailers are constructed around a 'Market Square' plaza area that has been created around the main entrance to Trago Mills. Photographs of the Market Square are provided at **Appendix MP2**.
- 1.14 The 'sales pitches' referred to in the enforcement notice and the refusal comprise a mobile butcher's van selling fresh meat, and a demountable grocers stall selling fresh fruit and vegetables. Their location is shown on the plan at **Appendix MP3**.
- 1.15 Marks' Mobile Butchers have traded at this location since April 2018 and S Williams and Son Grocers have traded there since May 2018.

- 1.16 Both operators trade from a specific area of the car park immediately adjoining and facing the 'market square' in front of the entrance to the store. This area experiences high levels of footfall and consequently the traders benefit from 'pass-by' trade from customers visiting Trago Mills.
- 1.17 The 'Market Square' offers a range of unrestricted Class A1 retail units, including a bakery, coffee/sandwich shop and sweet shop.
- 1.18 The two traders the subject of this appeal trade from Wednesday to Sunday and their trading days/hours are as follows:
- Wednesday 9am to 4pm
 - Thursday 9am to 4pm
 - Friday 9am to 6pm (Late Night Opening)
 - Saturday 9am to 5pm
 - Sunday 9.30am to 3.30pm

2.0 Planning Policy

- 2.1 The following planning policies are considered to be relevant to the appeal. They have not been repeated in full in accordance with the relevant PINS guidance.

Development Plan

- 2.10 Section 38(6) of the Planning and Compulsory Purchase Act 2004 indicates that planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 2.2 The Development Plan for the appeal site comprises the Merthyr Tydfil Replacement Local Plan (“RLP”). This was adopted on 29th January 2020 and so it postdates the issue of the enforcement notice and refusal of the 2019 application.
- 2.3 Policy AS18 of the now superseded Merthyr Tydfil Local Development Plan relied upon in the previous decision has been replaced by Policy EcW3 of the Replacement Local Plan. This confirms that outside the defined centres, proposals will be subject to an assessment of need and the sequential test. Proposals will then only be permitted where they avoid causing harm to town/local centre vitality and viability.
- 2.4 Para 4.40 of the RLP states that there is need to continue town centre regeneration to capitalise on the extra spending power attracted to Merthyr Tydfil through out-of-centre developments such as the Cyfarthfa Retail Park and Trago Mills.
- 2.5 Paragraph 6.7.33 states that where proposals are located outside a centre, need must be satisfactorily justified and a retail impact assessment will be required for all applications of 2,500 sqm or more gross floorspace. An impact assessment may also be required from smaller development proposals proportionate to the potential impacts.
- 2.6 The Plan acknowledges Trago Mills as an existing out-of-centre retailing area accommodating some bulky goods retailing, albeit that it doesn’t fall within the

defined hierarchy of retail centres.

Other material considerations

National Planning Policy - Planning Policy Wales Edition 10 ("PPW10"), December 2018

- 2.7 PPW10 at paragraph 4.3.14 sets out the requirement to consider the need for additional retail provision, having regard to the quantitative and qualitative need for both comparison and convenience goods.
- 2.8 Paragraph 4.3.15 states that need may be quantitative, to address a quantifiable unmet demand for the provision concerned, or qualitative.
- 2.9 Sections 4.3.18 through to 4.3.23 emphasise a town centre first to the sequential approach for the location of new retail development before consideration is given to edge of centre and then out of centre sites.
- 2.10 Paragraph 4.3.20 states that edge-of-centre or out-of-centre sites should be accessible by a choice of public and private modes of travel. New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community, and should not be allowed if they would be likely to put the development plan retail strategy at risk.
- 2.11 Section 4.3.25 notes retail developments outside designated retail and commercial centres can impact on viability and vibrancy of a centre. Such impacts, individually or cumulatively may include changes in turnover, trading ability, consumer choice.
- 2.12 Paragraph 4.3.26 confirms that retail impact assessments are required for retail proposals exceeding a threshold of 2,500 sq. metres or more gross floorspace.

- 2.13 At Paragraph 4.3.27 it states that for smaller retail planning applications or site allocations, planning authorities will need to determine whether an assessment is necessary, for example when a smaller proposal may have a significant impact on a centre. Requests for retail impact assessments by planning authorities on smaller developments should be proportionate to potential impacts.
- 2.14 Further guidance on assessing retail proposals is contained within Technical Advice Note (“TAN”) 4 “Retail and Commercial Development”.

3.0 Retail Impact

- 3.1 Retail impact assessment is normally only required for proposals over 2,500 sq m in area¹ and where a local planning authority is concerned that a proposal “*will have a significant impact on a retail and commercial centre*”.
- 3.2 This threshold is adopted as a default both in Wales and in England as it is normally only proposals of this scale or above that are generally capable of giving rise to the levels of harm to a town centre that will result in “significant impact”. Within this context it is surprising that the LPA has determined that the appeal proposal, with a trading area of about 24 sq m and representing under 1% of the national threshold, gives rise to impacts of a level that trigger conflict with policy.
- 3.3 Determination as to whether a proposal will have a “significant impact” requires consideration of two concepts. The first is that the policy basis of need for an impact assessment is consideration of effects on a centre ‘as a whole’ and not on any individual store. This is a well-established principle rehearsed (albeit in an English context) in the seminal call-in decisions at Rushden Lakes² and Scotch Corner³. In the latter case, for example, the Secretary of State accepted the findings of the Inspector (at 11.15):

“Superficially, DBC’s “sub-sectoral” approach appears attractive. However, I agree with the applicant and RDC that such an approach conflicts with national policy where the impact test requires any adverse impact to be assessed in light of the vitality and viability of a town centre as a whole.” (Our emphasis).

- 3.4 The second concept is that of determining what is a “significant impact”. TAN 4 at Paragraph 8.3 establishes a number of facets of impact but the overarching considerations are the quantitative trading effects (considered cumulatively with

¹ TAN 4, Paragraph 8.2

² APP/G2815/V/12/2190175

³ APP/V2723/V/15/3132873 and APP/V2723/V/16/3143678 (Extracts at **Appendix MP4 and MP5**)

other recently opened or permitted developments) and impact on investment.

- 3.5 There is no threshold for determining the level of trading impact on any town centre, since that will depend upon its health and ability to withstand trading diversion. Key appeal decisions that have considered impact however suggest that overall impacts must be at least 12-15% on the turnover of a centre as a whole (and often much higher), to satisfy the threshold of “significant” impact.⁴
- 3.6 It is in this context that we turn to consider the impacts of the appeal proposal.

Existing shopping patterns

- 3.7 The “Merthyr Tydfil Retail and Commercial Leisure Study Final Report 2017” prepared by Lichfields to inform the LDP review (“the 2017 Report”) identifies that Merthyr Tydfil town centre has a “base year” 2016 convenience turnover of about £50.06 million⁵. By 2021 this is forecast to fall marginally due to the rise in popularity of internet and other “Special Forms of Trading” (“SFT”) to £49.81 million.
- 3.8 Table 5 also shows that town centre convenience goods outlets draw the majority of their trade from local Zones 1 and 2, with Tesco drawing 71% of its trade from this core area and other stores about 80%.
- 3.9 The 2017 Report also highlights the importance of other sectors in making up the turnover of the town centre as a whole. The centre at 2016 also attracted a turnover of £76.90 million, rising to £81.58 million in 2021. The food and beverage sector adds £42.87 million to the centre’s turnover in 2016, rising to £45.45 million in 2021.
- 3.10 The overall trading turnover of the town centre as a whole therefore can be summarised as follows:

⁴ See for example, Rushden Lakes at IR8.86 (Extracts at **Appendix MP5**)

⁵ 2017 Report, Table 5&6: Tesco Extra and other unnamed Zone 1 stores. Extracts at **Appendix MP6**.

	2016 £M	2021 £M
Convenience	50.06	49.81
Comparison	76.90	81.58
Food and beverage	42.87	45.45
Total	169.83	176.84

- 3.11 This shows that as a whole, the town centre will see a 4% uplift in turnover between 2016 and 2021, equating to a turnover increase of just over £7 million.
- 3.12 With regard to the health of the town centre, we have undertaken a review in January 2020, against the 'health check' indicators set out in TAN4 at paragraph 13.3.
- 3.13 The survey found that the centre has a below average level of convenience stores in terms of numbers. However, it is noted that these units include a 4,488 sq m net Tesco store which acts as a retail anchor for the centre.
- 3.14 Iceland operates a 364 sq m store at Tydfil Square, and Farmfoods operates a store at the southern end of the town. There is a limited range of other convenience outlets and these are dominated by bakery uses including three independents and two Greggs outlets. There is one independent butcher (J W Millward) and one green grocery store (Fresh and Fruity) on Victoria Street. Other stores include an ethnic supermarket and a number of small 'corner shop' type stores on the periphery of the centre.
- 3.15 Merthyr Tydfil has a comparison offer that is below the national average. This is reflected in a limited representation by national comparison goods multiples and the recent closure of Wilko and Poundworld. Wilko opened a store at Cyfartha Retail Park in 2016 and in 2019 closed its store in the St Tydfil Centre. Brands still represented in the centre include New Look, Shoe Zone, Bonmarche, Trespass and Poundland.

- 3.16 Our survey concluded that the centre, when assessed against these standard indicators, is not particularly strong. This is a reflection of the national climate, particularly as several retail operators continue to struggle. However, the centre is not dependent on the convenience sector or on independent convenience providers, and is more reliant on service sectors.
- 3.17 A copy of the full health check assessment is included at **Appendix MP7**.

Proposed development

- 3.18 The approximate trading area of the fruit and vegetable stall operated by S Williams and Son is 3m x 4m (12 sq m). The sales space in the Marks Meats butcher's van is similarly about 3m x 4m sq m (12 sq m).
- 3.19 The proposed retail stalls therefore have a combined convenience sales area of 24 sq m. Adopting the "benchmark" sales density of the 2017 Report for unbranded convenience goods floorspace of £5,000 per square metre, these units would have a full-time estimated turnover of £120,000 per annum.
- 3.20 The stalls are however not open all week, trading from Wednesday to Sunday only. They are in situ for a total of 43.5 hours per week, compared to a typical "bricks and mortar" butcher or greengrocery store hours of about 60 hours per week. It is therefore appropriate to reduce the turnover forecast for the two units to reflect this. On a pro rata basis, the total turnover can be estimated to be £87,000 per annum.
- 3.21 In context, this represents barely 1% of the forecast growth of the town centre's turnover over the five-year period 2016-2021.

Trade diversion

- 3.22 The stalls serve customers to the Trago Mills outlet and therefore are primarily reliant on 'pass-by' trade to that outlet in the same way as the other convenience goods stores forming part of the market square.

- 3.23 The catchment for the Trago Mills outlet is recognised as regional rather than local, bringing extra spending power to the area. This is a point reflected for example in paragraph 4.40 of the RLP. Consequently, it is the experience of the traders that their customers are from the same wide catchment as that which serves Trago Mills. This is highlighted in the letter enclosed at **Appendix MP 8** from the proprietors of the stalls.
- 3.24 As outlined above, the 2017 Report also shows that existing in-centre convenience goods outlets serve a more localised catchment than in-centre stores. This explains why, for example, Merthyr Bakestone operates both at Trago Mills' Market Square and from an outlet in the town centre.
- 3.25 The letter from S Williams and Son at **Appendix MP 8** confirms that they also operate a stall at Merthyr Outdoor Market, in the town centre, and that both businesses are complementary. Since operating at Trago Mills the business confirms it has seen no impact on the sales at the town centre pitch.
- 3.26 Research undertaken by the LPA using GeoSense data illustrates there to be a degree of complementarity between Trago Mills and the town centre and the positive impacts of investment at Trago Mills is also acknowledged in the Replacement Local Plan.
- 3.27 It must be recognised that even within this complementary relationship, there will be a degree of overlap of customers. There are undoubtedly local residents that opt to visit Trago Mills and may undertake purchases there that they might otherwise have done on a trip to the town centre.
- 3.28 The policy imperative however is not to prevent such overlap as a matter of principle but to take a measured approach of supporting development and investment provided that no material harm arises.
- 3.29 It is a recognised principle of retail impact assessment that outlets compete on a 'like for like' basis, that is outlets of a similar type and format are more likely to compete

with each other than those that are fundamentally different. In this case, the town centre of Merthyr is anchored by traditional convenience stores including a large Tesco. The centre has a single butchery store and one fruit and vegetable store as well as occasional market stalls (including those operated by one of the traders the subject of this appeal). These stores are those most likely, under the “like for like” principle, to experience impacts, yet the operators of neither of these stores have objected to the 2019 planning application.

3.30 In discussion with the traders it is estimated that no more than 30% of the trade to the two stalls is derived from local customers that might otherwise be spending at town centre stores. However, to present a robust and conservative approach we have undertaken our assessment of impact on the basis that these outlets will take up to 50% of their trade from the town centre. This equates to £10,875 per annum, or a 0.02% impact on the town centre’s 2021 convenience goods turnover.

3.31 Expressed as a percentage of the town centre’s turnover as a whole the number is even lower, at 0.006%. This level of diversion is imperceptible and cannot reasonably be considered to have any, let alone a material, impact on the vitality and viability of the town centre.

3.32 By way of illustration, a similar conclusion was reached by an Inspector for the erection of a stand -alone pod in Orpington (APP/G5180/W/16/3143042) where it was concluded:

“to my mind, the addition of some 186 sq m GIA in an established retail park representing some 1% of existing floorspace, is likely to have no more than a marginal and non material effect on the vitality and viability of neighbouring centres.”

Harm to town centre investment

3.33 The only known investment plans in the centre of Merthyr Tydfil at present comprise the proposed Bus Station redevelopment, which was granted planning permission on

21st July 2016. The pre-commencement conditions associated with this development are being discharged, the most recent (Condition 9) having been discharged on 9th July 2019. This development does not provide any new retail floorspace.

Conclusions on impact

- 3.34 The above assessment has demonstrated that there is no demonstrable impact upon the town centre arising from the operation of these two stalls at Trago Mills. At an impact of 0.006%, this level of diversion is imperceptible and cannot reasonably be considered to have any, let alone a material, impact on the vitality and viability of the town centre.
- 3.35 The evidence provided by the traders themselves is also material in that the grocers also operate from the town centre with no impact upon the trade levels as a result of trading from a second location.

⁶ Application ref P/16/0048 (Appendix MP8)

4.0 Other retail policy considerations

- 4.1 Neither the refusal of application 19/0173 nor the enforcement notice raise objection on grounds of non-compliance with other aspects of retail policy. However, noting the reference within the Officer Report to the absence of evidence on matters of need and the sequential test and the requirements of the Development Plan in these regards, we have undertaken a proportionate review of both these issues.

Need

- 4.2 The subject proposal does not comprise buildings but temporary retail space. In this regard, for the purposes of retail analysis, the space is not considered as store trading space and is therefore treated separately by the ONS Blue Book and in the published economic data from providers such as Experian as a ‘Special Form of Trading’ (SFT), alongside internet sales, mail order and vending⁷.
- 4.3 As a consequence of this, the, headline convenience goods capacity data in the 2017 Report is not relevant when considering capacity since that considers in-store spending only. It specifically excludes spending at outlet types such as proposed and indeed “preserves” capacity growth for SFT (2017 Study at Appendix 2 Table 2) at the expense of capacity for store based floorspace.
- 4.4 Between 2016 and 2021 the study allows for non-store spending growth for convenience goods to rise from 2.8% to 4.4% of convenience goods spending. At 2021 this equates to approximately £26 million of available spending for SFT forms of trading, which includes market stalls.
- 4.5 In this context, there is demonstrable capacity for the proposed stalls.
- 4.6 Turning to qualitative need, the correspondence from the operators at Appendix MP2 shows that the stalls are separate yet complementary to businesses in the town

⁷ See Experian Retail Planner Briefing Note 16, December 2018, **Appendix MP10**

centre and consider that the footfall and pass by trade at Trago is critical and provides a unique opportunity to operate complementary services to those within Merthyr town centre.

Sequential Test

- 4.7 Although not referred to either in the enforcement notice or the refusal of the 2019 planning application, the officer report for that application does make reference to the sequential test and indicates that one should have been submitted to address vacant units in the town centre.
- 4.8 As outlined above, the proposed uses are complementary to the existing Trago Mills store and are not new destinations in their own right. They attract trade from visitors to Trago Mills which in itself has attracted trade to Merthyr Tydfil from wider areas. This was accepted in the granting of permission for an A1 retail pod at Pentrebach Retail Park in Merthyr Tydfil to be operated by Greggs (P/17/0244). In that case due to its complementary nature, there was no requirement for a sequential assessment for that proposal.
- 4.9 Whilst Trago is not a designated centre in the retail hierarchy defined by Policy EcW3, it is highly accessible, served by buses diverting into the site and performs as an established retail destination, a fact which is itself acknowledged in the Local Plan at paragraph 4.40 where it recognises that Trago Mills has performed an important role in attracting expenditure to the wider area and recognises it (alongside a number of other key retail nodes) to be a sequentially preferable location to out of centre locations.
- 4.10 These are relevant considerations in considering the area of search and weight to be afforded to the sequential test in this case.
- 4.11 In Warners Retail (Moreton) Ltd vs Cotswold District Council [2016] EWCA Civ 606 it was held that the application of the sequential test should not be rigidly applied and the format and scale of a proposal depends on the circumstances of the case and the

applicant/operators intentions and requirements.

- 4.12 When reviewing suitability and availability TAN 4 at paragraph 7.2 also states that suitability refers to “a site or buildings attributes and whether these are sufficient to meet the development requirements of a particular proposal”.
- 4.13 The format of trading of the appeal proposals is unique. The way these businesses operate, for temporary periods from multiple locations, mean that operating from a permanent fixed unit is not suitable.
- 4.14 Both operators also operate, from Wednesday through Sunday only, from very small trading areas. Whilst the total convenience sales floor area is 24 sq m in total, to combine the floorspace for the purposes of the sequential test is not considered appropriate as the two business operate as completely separate business entities with different requirements.
- 4.15 The grocer requires a flat, outdoor area to display goods, with immediately adjacent parking for the van in an area of high footfall. The only such location in the town centre available for this operation is in the outdoor market, where the business is already trading and has done for over 20 years.
- 4.16 There is therefore no operator requirement to trade from another separate location within the town centre. Moreover, we are advised that the conditions of the outdoor market limit occupation to specific numbers of each type of product.
- 4.17 The butcher operates from a mobile chilled van which travels around the UK and operating in a number of other locations. A fixed indoor shop unit is therefore completely unsuitable to accommodate this operation as the van provides the premises and equipment necessary.
- 4.18 Our review of the town centre found no premises or sites available to site a mobile van within the defined town centre. The primary shopping area is pedestrianised, with no vehicle access and we have identified no other areas that are not subject to

parking or waiting restrictions that would be suitable, even were the necessary street trading licences to be available.

- 4.19 We have undertaken a review of the units within the town centre, as well as searches of the Estates Gazette, Co Star and local property agents particulars. While there are vacant retail units within the town centre, there are none which, having regard to the specific requirements identified above, are considered suitable to accommodate the very specific nature of this type of retailing operation.
- 4.20 We have also considered the local centres of Gurnos, Brecon Road, Cefn Coed and Dowlais. None of these centres meet the operational requirements of the retail formats proposed.
- 4.21 Accordingly, we consider that the proposal is compliant with the sequential test.

Other considerations - precedent

- 4.22 The matter of precedent is implied by the LPA as a reasoning for its decision to progress enforcement action.
- 4.23 In R (Midcounties Co-Operative Limited) v Forest of Dean District Council [2017] EWHC 2050, Singh J confirmed (at paragraph 107) that: *“Although the authorities demonstrate that a local planning authority is not bound by its earlier decision, nevertheless it is required to have regard to the importance of consistency in decision-making”*. This judgment illustrates that while LPAs must have regard to consistency with earlier decisions, they are not bound by such decisions where the circumstances are materially different.
- 4.24 In this case the circumstances are unique. The traders are situated at an established retail location where they benefit from linked shopping trips with Trago Mills and thus are complementary to rather than in competition with the town centre. Indeed, the fruit and vegetable trader is already represented in the town centre at the outdoor market on the two days that it is open.

- 4.25 The plots upon which they are situated open directly onto the Market Square where they may take the maximum benefit from the pedestrian footfall to Trago Mills. These circumstances set a particular context which can readily be distinguished.
- 4.26 A further consideration is the risk of precedent being utilised by third parties. In this regard, the majority of “stall” type trading is done using permitted development rights and the issue of consistency in decision making does not arise. We have not identified any other example in the LPAs records of an application for permanent siting of market stalls. This is a unique set of circumstances that is, to any reasonable observer, unlikely to arise elsewhere.
- 4.27 As to the risk of a precedent being set for the Trago Mills site itself, it is evident from the facts that no other trader operates from the site even using PD rights. There is limited space facing the Trago Mills Market Square that is taken up by the two businesses the subject of the appeal. If the Inspector considers it necessary, conditions may be imposed to restrict future trading activities within the car park.
- 4.28 It must also be recognised that unlike, for example, housing development, all retail development is subject to consideration of a number of tests including cumulative impact assessment taking account of other proposals with permission or trading. As such, at any point the LPA would be entitled to draw a conclusion of materially different impacts and circumstances arising from any new proposal.
- 4.29 In the above context, the issue of precedent ought not to be material to the determination of this appeal.

5.0 Summary and Conclusions

- 5.1 This assessment has been prepared to support the enforcement appeal against the change of use of two pitches at Trago Mills.
- 5.2 It has been demonstrated that as a proposal significantly below the local threshold, impact is not a matter that requires assessment. Notwithstanding this, a proportionate assessment has been undertaken and found there to be no perceptible impacts upon convenience trade in the town centre.
- 5.3 The appeal proposal adds choice and range to the facilities at Trago with only modest scale of retail provision serving customers in a sustainable and accessible location, with appropriate parking provision. Trago Mills continues to attract visitors to Merthyr Tydfil and claw back trade from further afield.
- 5.4 In terms of need, we have undertaken a proportionate review and, in this context, there is demonstrable capacity for the proposed floorspace.
- 5.5 The nature of the operations of the butcher and grocer allow them to operate from Trago Mills as well as other locations, including within the town centre, and by allowing this appeal proposal to go ahead the operators will deliver benefits for both in terms of retaining employment and supporting a range and choice of retailing.