

From: Adam Cornish <adam.cornish@quod.com>
Sent: 17 February 2025 16:14:34 UTC+00:00
To: "Richard Shepherd" <RShepherd@lsh.co.uk>
Cc: "Adrian Fox" <adrian.fox@quod.com>; "Tim Rainbird" <tim.rainbird@quod.com>; "Eve Warwick" <eve.warwick@quod.com>; "Foster, Kevin" <Kevin.Foster@knowsley.gov.uk>; "Quinn, Mark" <mark.quinn@knowsley.gov.uk>
Subject: External Mail: Re: Planning Application - 23/02782/FUL WILSON ROAD, HUYTON - Response to LSH's draft Retail Planning Appraisal
Attachments: Huyton Phase 2 Retail Impact Tables (Revised February 2025).pdf

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Hi Richard,

Thank you for your email. We have updated our impact assessment (attached) to reflect the latest turnover figures now available. This is based on the following:

- Assumed the total turnover of £4,209 million and increased this by 10% to allow for VAT. Home Bargains sell a range of goods that have different / zero VAT rates
- Discounted the total turnover to allow for online sales by 4.7% in line with the latest estimated provided by GlobalData
- Applied this turnover to the total sales area of TJM in 2024. This has increased substantially from 2023 and confirmed by TJM to be 864,600 square metres in 2024
- Converted into 2022 prices to be consistent with the retail analysis undertaken to date

Based on this approach, a revised sales density of £4,565 per square metre is identified.

As illustrated by the updated analysis, by applying this sales density the impact on Huyton town centre increases very slightly (from -3.0% to -3.4%, or from -4.7% to -5.1% under the additional 'sensitivity testing' undertaken). In our view, this remains at a level that is not considered to be significant adverse.

I hope that this additional clarification and additional analysis is sufficient for you to finalise your advice to the Council.

Kind regards
Adam



Adam Cornish
Associate Director
07710 305 071
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From: Richard Shepherd <RShepherd@lsh.co.uk>
Sent: 14 February 2025 5:37 PM
To: Adam Cornish <adam.cornish@quod.com>
Cc: Adrian Fox <adrian.fox@quod.com>; Tim Rainbird <tim.rainbird@quod.com>; Eve Warwick <eve.warwick@quod.com>; Foster, Kevin <Kevin.Foster@knowsley.gov.uk>; Mark.quinn@knowsley.gov.uk <mark.quinn@knowsley.gov.uk>

Subject: RE: Planning Application - 23/02782/FUL WILSON ROAD, HUYTON - Response to LSH's draft Retail Planning Appraisal

Hi Adam

I'm just revisiting my advice on this one and will report shortly.

In terms of the sequential test, Avison Young informs me that the letting of Unit 20 Cavendish Walk is substantially progressed and the unit now appears to have been removed from letting websites. I will report on this basis.

In terms of the likely turnover of the store, you refer below to Globaldata's aggregated turnover figure for Home Bargains (which is inclusive of VAT) with that set out in the TJ Morris annual statement. I attach the most recently available company annual statement which shows:

- Turnover of £4,209m in the 12 months to June 2024; and that
- This is expressed net of VAT (as clarified by paragraph 1.3 of page 13 if the attached); and that
- The sales efficiency of existing TJ Morris floorspace improved in the period to June 2024 (as clarified by page 1 of the attached).

In the above context, the sales density expressed below appears out of date and, in any event, inaccurate (given that it does not appear to include VAT).

Are you possibly able to comment? I appreciate that this one has been with me for a while and I will complete advice without further delay when I have your response.

Regards

Richard

**Lambert
Smith
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Richard Shepherd BA (Hons) DipTP MRTPI

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From: Adam Cornish <adam.cornish@quod.com>

Sent: 06 January 2025 12:27

To: Richard Shepherd <RShepherd@lsh.co.uk>

Cc: Adrian Fox <adrian.fox@quod.com>; Tim Rainbird <tim.rainbird@quod.com>; Eve Warwick <eve.warwick@quod.com>; Foster, Kevin <Kevin.Foster@knowsley.gov.uk>; Mark.quinn@knowsley.gov.uk

Subject: Re: Planning Application - 23/02782/FUL WILSON ROAD, HUYTON - Response to LSH's draft Retail Planning Appraisal

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Dear Richard,

Thank you for your email. We provide a response to the comment raised below (in red).

We trust that this addressed the outstanding matters, and you are now in a position to provide finalise your advice. Should you have any queries or wish to discuss any matter further please do not hesitate to contact us.

Kind regards,
Adam



Adam Cornish
Associate Director
07710 305 071
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From: Richard Shepherd <RShepherd@lsh.co.uk>

Sent: 19 November 2024 2:47 PM

To: Adam Cornish <adam.cornish@quod.com>

Cc: Adrian Fox <adrian.fox@quod.com>; Tim Rainbird <tim.rainbird@quod.com>; Eve Warwick

<eve.warwick@quod.com>; Foster, Kevin <Kevin.Foster@knowsley.gov.uk>;
Mark.quinn@knowsley.gov.uk <mark.quinn@knowsley.gov.uk>

Subject: RE: Planning Application - 23/02782/FUL WILSON ROAD, HUYTON - Response to LSH's draft Retail Planning Appraisal

Dear Adam

In terms of the sequential test, do you have correspondence from the agent to confirm that the former Wilko unit is no longer available? **This was a direct discussion between the commercial agent acting on behalf of the Applicant and the agent marking the former Wilko. This confirmed that the unit was under offer for a leisure occupier.**

In terms of impact, I have not yet undertaken a full review of the below, but you should note the following:

- The turnover of the proposal will clearly be impacted by the ability to trade from an external area. Its purpose is to display goods to increase the turnover of the store. Whilst this area may not fall within the definition of a building's gross floorspace, it will clearly impact on turnover and impact, and needs to be accounted for.

As previously highlighted, the PPG that supports national planning policy is clear in stating that retail impact relates only to the gross retail floorspace proposed and that gross floorspace is defined as "the total built area measured externally which is occupied by a retailer or retailers, excluding open areas used for storage, display of goods".

We maintain that the external display area should not be included when assessing the likely turnover of the proposal and subsequent impact of the proposed development.

In addition, it is important to reiterate that there is no policy requirement to assess retail impact, which we maintain has not been fully recognised in your advice.

Furthermore, in considering the likely turnover of the proposed development this has been based on the average sales densities identified by GlobalData, which is updated on an annual basis. Updated sales densities provided by GlobalData, which has just been published after the submission of the planning application. Whilst this suggests that an average sales density for Home Bargains has increased to £6,208 per square metre, in closely scrutinising the baseline assumptions applied by GlobalData, we believe that this sales density is overstated. Indeed, GlobalData identified total sales (inclusive of VAT) to be approximately £4,490.18 million in 2023 (inclusive of online sales). By way of comparison, the Annual Report for the year ended 30th June 2023 identifies total turnover for the company of approximately £3,774 million – a difference of more than £716 million.

Furthermore, in terms of retail floorspace, GlobalData identifies a total sales area of 635,440 square metres in 2023. Information provided directly from TJM identifies a much higher sales area in 2023 of 819,141 square metres.

Consequently, by utilising the data provided directly from TJM, the average sales density for Home Bargains reduces to £4,607 per square metre. This is substantially lower than identified by GlobalData and utilised in the initial retail analysis provided in support of the application proposals (£5,722 per square metre). Furthermore, this sales density is derived from an overall turnover that includes online sales. If this is excluded (identified by GlobalData to be around 4.7% of total sales for Home Bargains), the sales density reduces further to £4,391 per square metre in 2023, or £4,049 per square metre at 2022 prices to be consistent with base data of the retail assessment undertaken in support of the application proposals.

Against this background, we believe that the sales density of £4,049 per square metre should be applied in estimating the likely turnover of the application proposal. By applying this sales density, the turnover of the proposal reduces from £12.08 million to £8.55 million – a reduction of £3.53 million (or 29%).

The updated retail analysis based on applying this revised sales density is attached. This demonstrates a reduced impact on Huyton town centre of -3.0%. This compares to our previous assessment identifying an impact of -3.9% on the Town Centre.

- In terms of trade diversion, Quod's RIA is clear that identified centres beyond the defined five-minute catchment 'largely serve a different catchment.' See below extract. The proportion of expenditure that is being diverted from unknown destinations 'elsewhere' is not considered credible in this context; it is in my view too high.

2.8 Whilst it is expected that the proposal will draw some trade beyond this area, it is not expected that this will represent its core catchment. Including identified centres beyond this catchment would not be appropriate as they would largely serve a different catchment to that intended to be served by the proposed development.

We maintain that the proportion of turnover from 'elsewhere' is a realistic based on anticipated existing shopping patterns, the strength and proximity of competing provision and the nature of development proposed.

In considering this specific it is important to reiterate that our position is that the proposal will derive expenditure generated in the local area that is currently being directed to facilities elsewhere beyond the Huyton area, not that the proposal will be drawing substantial trade from retail expenditure generated by residents beyond the identified catchment. However, some of the proposal's turnover will still be derived from beyond the catchment, particularly in areas where the Application Site is comparable in distance / time than competing provision – for example for residents in Hough Green to the south, Netherley to the west and Whiston Cross to the east.

As outlined by our previous correspondence (email dated 13th November 2024) we estimate that the majority of retail expenditure generated in the catchment area (c. £74.7 million in 2024) is identified to be directed to facilities elsewhere (i.e. to destinations outside the five-minute catchment). Our assessment assumes that less than 12% of this 'leakage' will be attracted to the proposed development. This is considered realistic, and reduces to less than 9% based on the revised turnover of the proposal.

Furthermore, when considering the likely trade diversion from elsewhere it is important to note that residents in parts of the catchment are in close proximity to comparable facilities located just beyond the catchment area than Huyton town centre, and the proposed development will provide a convenient alternative for these residents. This includes Prescott and Belle Vale, where there is a substantial overlap with Home Bargains, including representation from the prospective occupier.

Despite this, for robustness we have updated our assessment to reduce the level of diversion from 'elsewhere' by 25% and redistributed this expenditure on a *pro rata* basis to identified destinations within the catchment area. This updated assessment identifies that the impact on Huyton town centre is identified to increase from -3.0% to -4.7% by 2029.

As previously highlighted, there is no policy requirement to formally assess retail impact. Instead, it is understood that the Council has requested an impact assessment so that this information can be used as part of the overall planning balance. In this respect, this level of impact on Huyton town centre, which we believe is overstated, remains at a level that does not outweigh the substantial wider benefits associated with the application proposals.

- The 'sectoral impact' approach referred to by the Secretary of State Scotch Corner call-in decision is not comparable with the consideration of the ongoing viability of individual anchor stores. You will be aware that the review of individual store's trading position has remained a mainstay of retail impact post-Scotch Corner. Such analysis is helpful in understanding the composition and strength of the overall centre post-trading impact, and I note that your revised assessment addresses the turnover of individual stores.

There have been a number of Secretary of State decisions that confirm that the impact should be based on the centre as a whole, and this has not just been established by the Secretary of State decision at Scotch Corner – as referred to in the submitted Retail Impact Assessment.

Nevertheless, our updated assessment demonstrates that the proposals are unlikely to lead to a significant adverse impact, and lead to the closure of any existing stores within Huyton town centre. This lack of impact is reflected by the fact that there has not been any objection to the application proposals from existing retailers.

The highest impact is identified to fall on the existing Home Bargains in Huyton town centre. As outlined in the additional evidence submitted in September 2024 ('Additional Retail Evidence'), TJM is committed to retaining a presence in Huyton town centre and have had direct discussions with Knowsley Council regarding how their offer can improve. Reflecting this, we can confirm that the Applicant would be agreeable to an appropriately worded condition requiring the retention of a Home Bargains store in Huyton town centre for a period of time.

We hope that this response and additional evidence is sufficient for you to consider the likely impacts of the application proposal. It is important to reiterate that there is no formal policy requirement to consider retail impact, but has been completed to assist the local planning authority in the overall planning balance. In this respected, we maintain that the modest levels of impact on Huyton town centre would not outweigh the wider benefits associated with the proposals. These are outlined in the submitted Planning and Retail Statement (dated November 2023), and include:

- Significant job creation in both the construction and operation phases – creation of more than 500 full-time equivalent jobs – in an area with high unemployment rate.
- Local labour, skills and training opportunities
- Substantial increase in GVA (approximately £14 million annually)
- Delivery of a longstanding vacant brownfield site that will support economic growth.

I would recommend that you give further consideration to updating the assessment in light of the above comments. I am happy to discuss if this would assist.

Regards

Richard

**Lambert
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From: Adam Cornish <adam.cornish@quod.com>
Sent: 18 November 2024 09:51
To: Richard Shepherd <RShepherd@lsh.co.uk>
Cc: Adrian Fox <adrian.fox@quod.com>; Tim Rainbird <tim.rainbird@quod.com>; Eve Warwick <eve.warwick@quod.com>; Foster, Kevin <Kevin.Foster@knowsley.gov.uk>;
Mark.quinn@knowsley.gov.uk
Subject: Re: Planning Application - 23/02782/FUL WILSON ROAD, HUYTON - Response to LSH's draft Retail Planning Appraisal

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Dear Richard

Following my email last week I just wanted to check the below had been received and the anticipated timescales for a response?

Please let me know if you have any questions.

Kind regards
Adam



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Associate
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21 Soho Square
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From: Adam Cornish
Sent: 13 November 2024 9:37 AM
To: Rshepherd@lsh.co.uk <Rshepherd@lsh.co.uk>
Cc: Adrian Fox <adrian.fox@quod.com>; Tim Rainbird <tim.rainbird@quod.com>; Eve Warwick <eve.warwick@quod.com>; Foster, Kevin <Kevin.Foster@knowsley.gov.uk>;
Mark.quinn@knowsley.gov.uk <mark.quinn@knowsley.gov.uk>
Subject: Planning Application - 23/02782/FUL WILSON ROAD, HUYTON - Response to LSH's draft Retail Planning Appraisal

Dear Richard,

Thank you for sending through your draft retail appraisal in respect of the pending planning application at Sovereign Industrial Park, Wilson Road, Huyton (ref. 23/02782/FUL). In reviewing this we note that some

issues are raised regarding the proposal's conformity with the retail policy 'tests' – namely the sequential approach to site selection and retail impact – and that additional information is required. We deal with each of these matters in turn below.

a. The Sequential Test

In reviewing the sequential approach undertaken in support of the planning application we note that the extent of the area of search is agreed and that the only sequential alternative that requires further consideration is Unit 20, Cavendish Walk Shopping Centre (former Wilko).

As suggested, the applicant has had further discussions with the agents marketing the unit. This has confirmed that the unit is under offer to a leisure user. It is therefore not available.

Regardless of the unit's availability, it remains our strong view that it is not suitable for the proposed development. Although the unit extends to 2,601 square metres, this is provided over 2 floors, with approximately 1,895 square metres provided at ground floor. This is below the minimum floorspace threshold required, which already represents a flexible position being substantially lower the minimum floorspace requirement for Home Bargains (2,323 square metres).

Furthermore, Unit 20 lacks the requisite at-grade customer car parking. Although reference is made to the potential to use undercroft parking, the configuration of this parking, which will not be at-grade, does not provide an appropriate arrangement for the high number of shoppers that use trollies. Indeed, there is no example of any large-format Home Bargains store that are served by undercroft car parking.

Undercroft parking also raises wider issues on safety and anti-social matters. Indeed, there is a pending application (ref. 24/00479/FUL) to amend the existing condition that requires the car park below Cavendish Walk to be made available whilst the development is in use. The reason for the amendment is to allow the car park to be permanently closed, with the Applicant citing significant issues with anti-social behaviour and health and safety in maintaining the underground car park. These issues would continue for any prospective occupier of Unit 20 as it is unlikely that customers will use the car park given the safety fears which further compound the unsuitability for shoppers using trollies due to the lack of direct and safe access from the car park to the store. The unsuitability of using the car park in connection with the retail unit above is reflected by the fact that the car park has in fact been closed for the last 18 months, as confirmed in the pending application (ref. 24/00479/FUL). Overall, even if parking could be provided it is entirely unsuitable for the nature of operator proposed and its customers.

Unit 20 is also located at the very periphery of the agreed catchment area that the proposal is intending to serve. Consequently, locating the application proposal within Huyton town centre, where there is already a strong representation from the discount retail sector, would fail to meet the specific need that the proposal is intended to both serve and improve the distribution of such retail facilities, and reduce expenditure leakage.

For all of these reasons we maintain that no sequentially preferable site exists that is available and suitable to accommodate the proposed development having regard to flexibility of format and scale; the sequential test has been satisfied.

b. Retail Impact

In considering retail impact, it is significant to note that the appraisal (at paragraph 1.3) identifies that the purpose of this advice is to:

“...consider the application proposal's compliance with retail and town centre planning policy as set out by the statutory development plan and by the revised National Planning Policy Framework...”

In this respect, when considered against both the Development Plan and national policy, it is important to reiterate that the scale of retail development proposed means that there is no policy requirement to

assess impact. It is therefore disappointing that this is not acknowledged in the advice to the local planning authority. Instead, the advice simply assesses the proposals against the impact tests set out by the NPPF. This is despite there being no policy requirement to do so. It is therefore within this context that any impact associated with the proposed development and the comments raised to the assessment that has been undertaken must be based. The Planning Practice Guidance ('PPG') is clear in stating that where an impact assessment is proportionate to the application proposed. Here, as a retail impact assessment is not technically required in light of the prevailing retail policy, any conclusions should be couched accordingly.

In terms of the comments raised on the impact assessment that has been undertaken, and the outstanding matters identified, we provide a response to each point below.

- Turnover of Application Proposal: It suggested that in estimating the likely turnover of the proposed Home Bargains no allowance has been made for increased sales efficiencies, and that the potential turnover of the proposal by 2029 is underestimated. This is not correct.

Our assessment has allowed for increased sales efficiencies in line with the latest estimates identified by Experian. This is illustrated by the supporting retail tables (Document 2) provided as part of the submitted Retail Impact Assessment ('RIA'). Table 2 identifies an anticipated turnover of the proposal to be £12.08 million and in identifying impact in 2029 (Table 3a-c) identifies an increase in turnover for the proposal of £12.95 million by 2029. The footnote to the relevant tables also notes that an allowance has been made for increased sales efficiencies. Consequently, our assessment is very robust, and no revision / update is required. The turnover figure for the proposal applied in assessing retail impact is greater than the alternative figure you have identified in your advice (£11.90 million albeit in 2028).

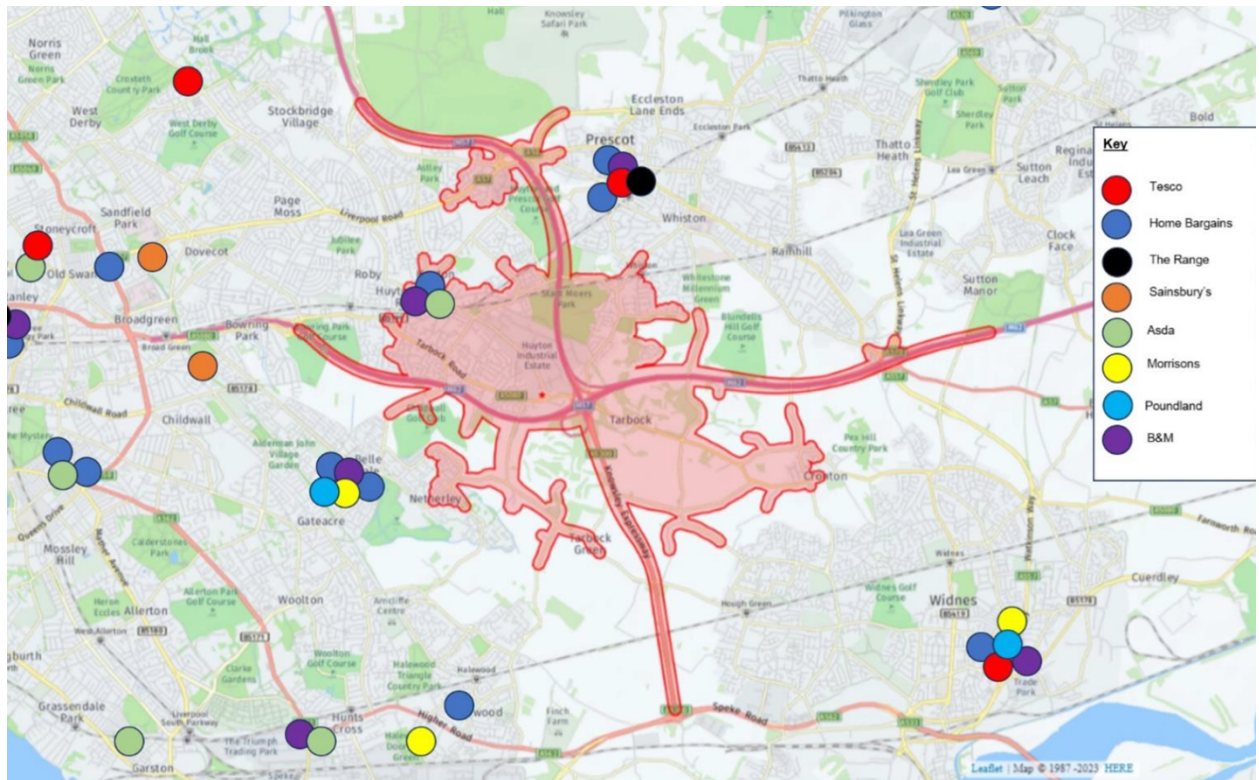
It is also suggested that the external garden centre should be included when assessing the turnover of the proposal. In considering this specific matter it is important to note that the PPG (that supports the NPPF) outlines (Paragraph: 015 Reference ID: 2b-015-20190722) that the impact test only applies to the gross retail floorspace proposed. Gross floorspace is defined in the PPG as *"the total built floor area measured externally which is occupied exclusively by a retailer or retailers, excluding open areas used for the storage, display or sale of goods"*. (my emphasis)

Given this, in line with the PPG it is not necessary to include the external display area when assessing retail impact. The approach undertaken in not including external display area is entirely consistent with that undertaken (and accepted) by numerous local planning authorities.

Overall, the estimated turnover of the proposal in the accepted design year (2029) is robust and can be relied upon in understanding the likely trading effects of the proposal.

- Patterns of Trade Diversion: It is agreed for the purposes of assessing the likely trading performance that the benchmark approach undertaken is appropriate. However, some queries have been raised regarding the assumptions applied.

One of the specific queries raised refers to the proposal development drawing the bulk of its trade from a five-minute catchment. As a result it asserted that a high proportion of the proposal's turnover will be derived from local facilities, namely Huyton town centre. However, it does not necessarily follow that a high proportion of trade will be derived from facilities in Huyton. Instead, it is anticipated that a significant proportion of the proposal's turnover will be from locally generated expenditure that is currently being directed to facilities outside the five-minute catchment. As illustrated on the plan showing the extent of competing provision (included in our Additional Retail Analysis submitted in September 2024 and replicated below), there is significant competing provision located just beyond the five-minute drivetime. This includes a number of large-format Home Bargains stores. It is anticipated that a substantial proportion of shopping trips of residents within the five-minute catchment will be derived from these destinations.



Existing retail facilities in Huyton town centre are identified to achieve an expected turnover by 2029 of £92.5 million (Table 3c of Document 2 to the submitted RIA). However, given the location of this existing offer at the very periphery of the five-minute catchment it would be reasonable to assume that a substantial proportion of the town centre's turnover will be derived from residents beyond the five-minute drivetime from the Application Site. There is significant resident population to the north and west of the town centre that is beyond the catchment area of the proposal. Indeed, within a 10-minute drivetime of Huyton town centre - which represents a reasonable basis to understand the catchment of Huyton town centre given that it sits at the top of the retail hierarchy in the Borough alongside Kirkby and Prescot – the population is more than 147,000 in 2024. This compares to a population within the agreed catchment for the proposal of approximately 20,200 in 2024. This equates to less than 14% of the resident population within 10 minutes of Huyton town centre being located within the catchment area of the proposed development. This illustrates that a large population and associated retail expenditure that will be directed to Huyton town centre is located outside the five-minute catchment of the proposal. On this basis, it is reasonable to assume that a high proportion of Huyton town centre's turnover is derived from beyond the five-minute catchment from the Application Site.

Based on an estimate that 20% of the expected turnover of facilities in Huyton town centre is derived from residents within the five-minute catchment (which is considered cautious given the limited extent of the five-minute catchment and the overlap with the wider catchment of Huyton town centre), and 60% for other facilities in the catchment (namely Aldi and Tesco Express located at its southern periphery of the five-minute catchment) the expected turnover of existing facilities derived from the catchment area is identified to be £30.3 million in 2029. This compares to the resident population within the five-minute catchment generating £105.0 million of retail expenditure in 2029. Consequently, the majority of locally generated expenditure (£74.7 million) is identified to be directed to facilities elsewhere. The high level of leakage within Knowsley has long been acknowledged by the Council – as set out in the Technical Report prepared for the Core Strategy (https://www.knowsley.gov.uk/sites/default/files/2023-11/TR04_Planning-for-Retail-in-Knowsley-TechnicalReport-Submission13.pdf).

Given that approximately £65 million of retail expenditure generated in the catchment area is identified be directed 'elsewhere' it is considered reasonable to assume that a substantial proportion of the proposal's retail turnover will be derived from such facilities. For the purposes of our assessment, it is estimated that the retail diversion to the proposal from elsewhere equates to c. £9 million (or 12% of the identified leakage). We maintain that the level of trade diversion from elsewhere is based on reasonable assumptions.

It is also highlighted that the assessment does not identify which destinations elsewhere the proposal will derive its trade from and that this level of detail should be provided. In considering this specific issue, it is important to understand that the reason an impact assessment has been requested by the local planning authority given that there is no strict policy reason for assessing impact. Instead, correspondence from the Council (email dated 31st May 2024) confirmed that:

"The application in reference to the retail element (Home Bargain store) places significant emphasis on the employment/regeneration/amenity benefits of the retail element of the proposal. The local planning authority would need to weigh these benefits against the impact the retail proposal would have on Huyton Town Centre and the nearby local centres of Tarbock Road and Manor Farm Road".

In this context, we do not believe a more detailed breakdown of where the proposal will derive its trade from is needed for the local planning authority to consider the impact of the proposal on these centres.

Finally, it is noted that the monetary diversion of the existing B&M and Home Bargains Huyton town centre has not been explicitly identified and it is suggested that this should be provided. As outlined in the submitted RIA, Secretary of State decisions have established that the assessment of impact should be made against the town centre as a whole. Indeed, the Secretary of State decision at Scotch Corner, North Yorkshire (ref. APP/V2723/V/15/313873), the Inspector concluded that:

"Superficially, DBC's [Darlington Borough Council] "sub-sectoral" approach appears attractive. However, I agree with the applicant and RDC [Richmond District Council] 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."

The Inspector's position was supported by the Secretary of State in stating that:

"For the reasons given at IR11.11-11.15, he agrees with the Inspector's conclusions on the numerical assessments of the impact on town centre turnover put forward by various parties, and further agrees with the Inspector's conclusions in giving little weight to the 'sub-sectoral' approach put forward by Darlington Borough Council."

For these reasons, it is not necessary to assess the impact on individual stores. Instead, the overall levels of impact provide the appropriate basis for assessing impact. In this respect, our assessment identifies a retail impact of just -3.9% on the overall retail turnover of Huyton town centre. In our view this is not considered significant adverse.

Nevertheless, for completeness we have provided a more detailed breakdown of the likely trading effects of the proposal. This additional analysis (attached) shows that the impact on a particular store will continue to not be significant adverse and not at a level that would undermine their long-term viability. The highest impact on any individual (albeit only -6.7%) is identified to fall on the existing Home Bargains. The Applicant (the parent company of Home Bargains) is comfortable with these levels of impact and that this level of trade diversion will not undermine the long-term viability of this store. There is no suggestion that this level of impact will lead to its closure. As outlined in the retail evidence previously submitted in support of the application, the proposed development and the existing Home Bargains store will largely serve different roles and catchments. The dual trading

of Home Bargains stores is common across Merseyside. For example, at Belle Vale and Prescot. This will also be the case in Huyton.

c. Concluding Remarks

For the reasons outlined above, we maintain that robust evidence has been provided to support the planning application. The evidence is sufficient for local planning authority to understand the likely trading effects of the proposal on Huyton town centre and the nearby local centres of Tarbock Road and Manor Farm Road. These statements are made in light of the fact that there is no retail policy requirement to undertake a full retail impact assessment.

It is agreed that the proposals will not lead to a significant adverse impact on planned investment. The evidence provided also demonstrates that the proposal will not lead to a significant adverse impact on the long-term vitality and viability of Huyton town centre. Sufficient evidence is before the local planning authority to weigh the wider benefits of the scheme against the potential impact on neighbouring centres. This is the purpose of the impact evidence that has been provided, rather than there being any policy requirement to assess retail impact in full.

We hope that the additional evidence clarifies the position and that you are now in a position to finalise your advice and conclude that the proposals are acceptable.

Kind regards,
Adam

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