



## Note

### Additional Retail Analysis

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#### 1 Scope & Purpose

- 1.1 This Note has been prepared in support of the pending planning application (ref. 23/02782/FUL) for retail-led regeneration of the former Halewood Distillery at Sovereign Industrial Estate in Huyton ('the Application Site'). This provides additional retail evidence in support of the planning application following comments received from the Planning Policy Team at Knowsley Council in their response dated 23<sup>rd</sup> August 2024.
- 1.2 This response should be read alongside the retail evidence already submitted in support of the planning application. This includes the Retail Impact Assessment ('RIA') prepared by Quod (dated July 2024).
- 1.3 The Planning Policy Team have requested that further justification / information in respect of the following:
- Catchment Area;
  - Impact on Planned Investment and Vitality and Viability; and
  - Impact on vitality and viability.
- 1.4 We deal with each matter in turn below.

#### 2 Catchment Area

- 2.1 The area of search for applying the sequential approach has been based on a five-minute drivetime from the Application Site. Such an approach is consistent with that undertaken for similar proposals throughout the UK (as evidenced in the RIA<sup>1</sup>) and is considered an appropriate area of search in applying the sequential approach.
- 2.2 Established best practice<sup>2</sup> identifies that when considering an appropriate area of search, it will be relevant to consider the scale and form of development proposed and the strength and proximity of competing provision for each case.
- 2.3 The proposed development seeks to accommodate a specific retailer, Home Bargains ('HB'), seeking to strengthen their existing offer in Huyton, with an existing offer in the town centre<sup>3</sup>. HB is a discount variety store selling a range of convenience (c. 45% of total floorspace) and comparison (c. 55% of total floorspace) goods. The principal competitors to HB and other

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<sup>1</sup> Paragraphs 2.7 to 2.10

<sup>2</sup> This includes appeal decisions, Secretary of State decisions and the detailed practice guidance that supported the predecessor to the NPPF (PPS4)

<sup>3</sup> 26-30 Derby Road

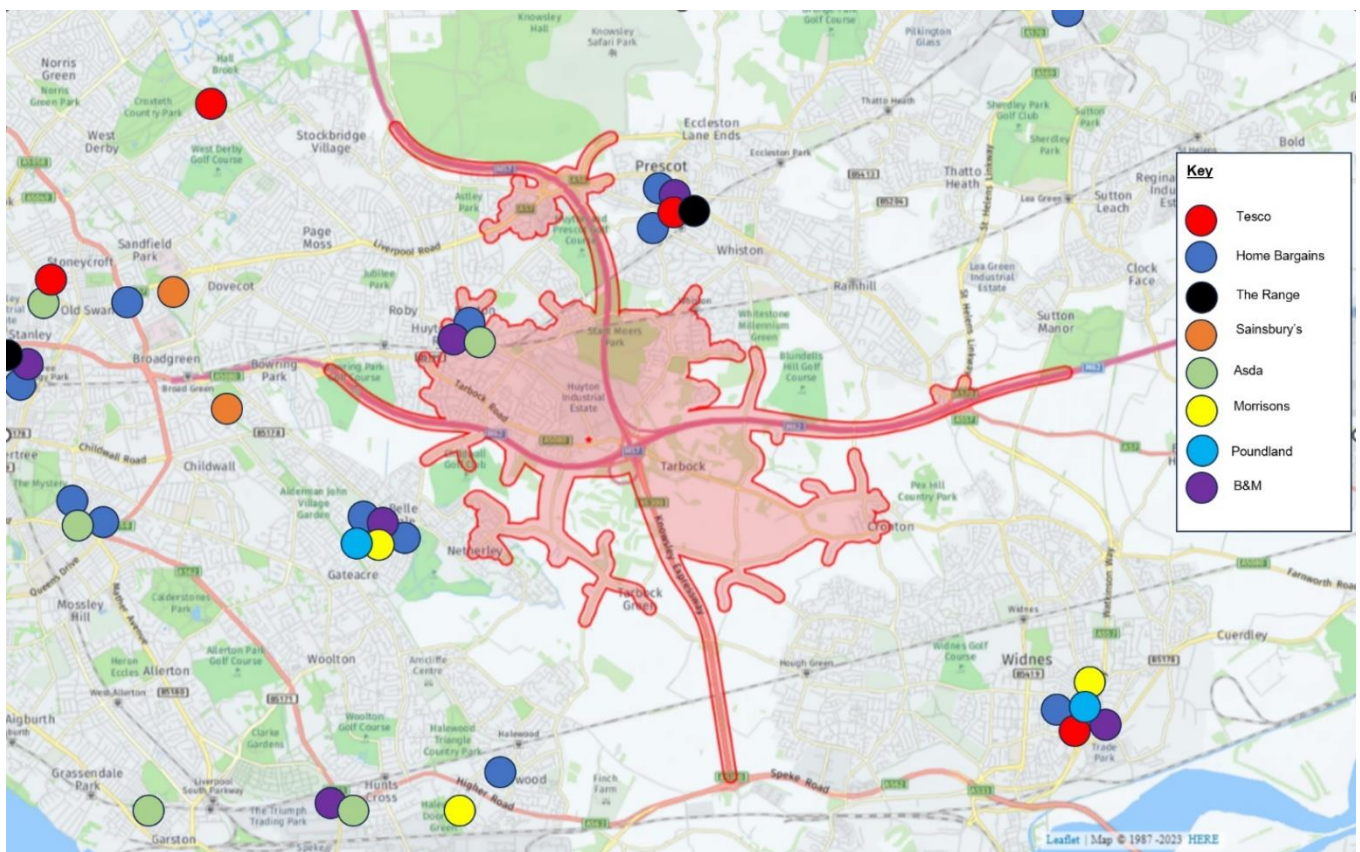


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comparable discount retailers, are large-format supermarkets and other discount variety stores. In terms of the latter, this will include other HB stores, and retailers such as B&M, The Range and Poundland, all of which are represented in the local area.

- 2.4 In this respect, Figure 1 illustrates the extent of a five-minute drivetime from the Application Site and identifies some of the key competition to HB.

Figure 1: Extent of 5-minute Drivetime from the Application Site and Location of Competing Provision



- 2.5 Given the nature of the goods sold, it is not expected that shoppers will travel significant distances, bypassing a comparable offer, to visit the Application Site. For the nature of retailing proposed, shoppers typically use their closest store that sell comparable goods. In this location, this will include a number of existing HB stores.
- 2.6 For example, shoppers in the Belle Vale area (within the neighbouring authority of Liverpool City Council) are unlikely to travel to the Application Site when there is already a strong existing offer locally – this includes a large-format HB store on Childwall Valley Road, which has only recently opened together with representation from Morrisons, B&M and Poundland. Residents within the Belle Vale are already well served by its discount retail offer. There is no reason to travel to the Application Site. Likewise, people in the Prescot area are unlikely to travel to the Application Site given the strength of the comparable offer locally, including the existence of



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two Home Bargains stores both in town and on the edge of the town. Again, there would be no reason to travel from the Prescott area to the Application Site.

- 2.7 Within this context, considering the strength and proximity of competing comparable retail provision, it is entirely reasonable (and therefore appropriate) to base the catchment area on a five-minute drivetime from the Application Site.
- 2.8 In addition, as illustrated at Figure 1, there is a limited discount retail offer within this area. The application proposals are therefore well positioned to meet this specific gap in the retail offer. Locating the proposal outside the catchment will not meet this need.
- 2.9 Against this background, the five-minute drivetime catchment remains entirely appropriate, and represents the core catchment of the proposal. This is supported by best practice<sup>4</sup>. Within this area there are no sequentially preferable sites that are available and suitable to accommodate the proposed development.

### 3 Impact on Planned Investment and Vitality and Viability

- 3.1 The likely impact of the application proposals against planned investment in existing centres was provided in the RIA<sup>5</sup>. This concluded that there is no existing, committed and planned public or private investment in Huyton town centre that would be adversely impacted upon by the proposals.
- 3.2 In considering this position, the Planning Policy Team response highlights that the Huyton Village Masterplan is not prescriptive and acknowledges that, whilst selected sites may not come forward, there may be others that do come forward. As a result, it is suggested that contact is made to the Town Centre Manager and the Head of Major Development at Knowsley Council.
- 3.3 It is not clear from the Planning Policy Team response whether it is for the Applicant to contact both parties. Regardless, an approach to consider impact on potential sites that could come forward is at odds with the position established by case law – including the Rushden Lakes Secretary of State decision referred to in the RIA. This decision established that reference to ‘existing’ investment is that which has already been made and that ‘committed’ investment is that which is contractually committed (private) or subject to resolution (public). This differs to considering potential schemes that *may* come forward at some point in the future but is yet to be confirmed.
- 3.4 Within this context, we are not aware of any investment that is committed. Indeed, whilst it is acknowledged that Knowsley Council has recently bought part of Cavendish Walk to facilitate the redevelopment of the town centre, it is understood that aspirations for this site is to deliver a headquarters for Knowsley Council as well as a hotel, homes, new public realm and offices.

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<sup>4</sup> This includes appeal decisions, Secretary of State decisions and the detailed practice guidance that supported the predecessor to the NPPF (PPS4)

<sup>5</sup> Paragraphs 2.11 to 2.22



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Given this, the Council's aspirations will not be undermined by the allowing HB to trade from the Application Site.

- 3.5 Furthermore, TJ Morris Limited ('TJM'), the parent company of HB have had direct discussions with senior officers at Knowsley Council to see how they can strengthen their representation in Huyton town centre should the right opportunity arise. TJM is committed to Huyton and retaining a presence in Huyton town centre alongside the new store at the Application Site. This underlines the different core catchment the Application Site serves.
- 3.6 Given this, and the nature of development proposed, we maintain that there is no evidence to suggest that the application proposals are likely to lead to a significant adverse (which is the policy test) on planned or committed investment.

## 4 Impact on Vitality and Viability

- 4.1 In reviewing the RIA, the Planning Policy Team has requested further information / clarification in respect of the 'health' of Huyton town centre.
- 4.2 In this respect, a more detailed health check of Huyton town centre has been undertaken and is contained at **Appendix 1**. The health check considers the role and function of the town centre by considering the indicators set out in the Planning Practice Guidance informed by a site visit to Huyton town centre by Quod in September 2024.
- 4.3 In summary, this additional analysis demonstrates the following:
- Huyton town centre comprises a good mix of retail and service uses. The retail offer is anchored by a number of national retailers, including representation from Asda, Decathlon, B&M and Home Bargains, who are committed to retaining their presence in the town centre.
  - The service sector is very well represented with more than half of occupied units falling within this sector. Significantly, this important sector will not be undermined by allowing Home Bargains to trade from the Application Site.
  - Whilst vacancies within the town centre are currently above the national average, this is largely due to ongoing redevelopment proposals coming forward rather than due to a declining town centre, particularly the substantial cluster of vacant units around Landsdowne Way.
  - This ongoing regeneration will have a positive impact on the long-term vitality and viability of Huyton and demonstrates confidence in Huyton town centre. Furthermore, as outlined above, TJM, the parent company of the prospective retail occupier for the Application Site have been in discussions with the Council about further investment in the town centre.



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- 4.4 Given the role and function of Huyton town centre, together with the limited trade diversion identified (up to -3.9%<sup>6</sup>), there remains no suggestion that the proposals will lead to a significant adverse impact on the vitality and viability of the town centre. Post development, the retail turnover of the town centre will continue to increase by more than £2 million<sup>7</sup>. Trade diversion from the town centre will principally be derived from the existing large-format Asda, which appears to be trading well and extends to more than 10,000 square metres of floorspace. The modest levels of impact expected as a result of the proposal will not undermine the long-term viability of this store.
- 4.5 Furthermore, as outlined in the submitted RIA, a substantial proportion of trade will be drawn from destinations further afield rather than directly from Huyton town centre. Consequently, by retaining more 'spend' in the local area there is the opportunity for more trips to Huyton town centre, both in terms of shopping and visiting the wider service sector, which is well represented.
- 4.6 Overall, we maintain the position that the proposals will not lead to a significant adverse impact on the vitality and viability of Huyton town centre or any other defined centre.

## 5 Summary and Conclusions

- 5.1 Based on all the retail evidence submitted in support of the planning application we maintain that the proposals accord with relevant retail planning policy.
- 5.2 It has been demonstrated that no sequentially preferable site exists within the expected catchment area of the proposal. Significantly, no alternative site has been suggested by the Policy Team. Instead, further evidence has been requested to justify the catchment area. This has been provided and we maintain that the area of search remains entirely appropriate.
- 5.3 With regard to retail impact, whilst we maintain that there is no policy requirement to assess retail impact given the scale of the development, it has been demonstrated that the identified impact on neighbouring centres will not be significant adverse (the policy test).
- 5.4 As outlined in the submitted RIA, the highest impact (albeit only -3.9%) is identified to fall on Huyton town centre. This level of impact will not undermine the long-term vitality and viability of the Town Centre. As demonstrated by the recently completed health check, Huyton provides an important retail and service offer, which will benefit from the ongoing regeneration coming forward.
- 5.5 Likewise, there is no evidence to suggest that the proposals will lead to a significant adverse impact on planned or committed investment. Development proposals coming forward in Huyton town centre includes a new headquarters for the Council, and other non-retail uses. The delivery of a HB store at the Application Site will not undermine this planned investment.

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<sup>6</sup> As identified by the submitted RIA

<sup>7</sup> The test set by the Rushden Lakes Secretary of State decision



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- 5.6 For all these reasons, we maintain that there is no retail policy reason why the scheme cannot be supported. Overall, the proposals comprise sustainable economic development that represents significant private sector investment in the Borough, delivering jobs and having a long-term positive economic impact. The proposed retail development will also critically act as a catalyst for the regeneration of the wider industrial estate, as proposed.

**ENDS**