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RETAIL STATEMENT

Retail Store (Class E)

Holt Hotel, Warrington Road,
Rainhill, Prescot L35 8LA

Cordage Estates Ltd

September 2021



RTPI

mediation of space - making of place

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1 INTRODUCTION

- 1.1 This statement has been prepared to accompany an application for Planning Permission for the erection of a retail store (Class E) within the curtilage of the Holt Hotel. Its purpose is to address the retail policies contained in the Development Plan taking account of guidance in the revised (2021) National Planning Policy Framework.
- 1.2 The Development Plan comprises the Knowsley Local Plan Core Strategy, adopted in 2016 and the saved policies of the Knowsley Replacement Unitary Development Plan which was adopted in June 2006.
- 1.3 The current application follows an earlier application (Ref. 20/00102/FUL) which was submitted in February 2020 and withdrawn in September 2020 pending new traffic analysis. This statement is intended to update and replace the retail Sequential Assessment which was submitted with that application.

2 PROPOSED DEVELOPMENT

- 2.1 The proposed new store will have a gross internal area of around 342sqm and a net sales area of around 225sqm (not to exceed the 280sqm limit contained in the Sunday Trading Act) and represents a local convenience store.
- 2.2 The convenience store will function as a small, local food store helping meet the day-to-day needs of local residents, comprising a local walk-in catchment population and a limited amount of pass-by trade. The store is expected to carry a basic range of groceries, ready meals, sandwiches and snacks, beers, wines and spirits and a range of fresh fruit and vegetables.
- 2.3 An on-site delivery area is located to the east of the building and a plant area to the north at the rear elevation. Ample parking provision for both the new convenience store and the existing public house is provided in a re-configured car park to provide 25 parking spaces.

3 SITE CONTEXT

- 3.1 The Holt public house is a large two storey (plus attic) building sited within a large, rectangular shaped plot at the corner of Warrington Road and Holt Lane. To the west of the pub is a large car parking area set behind a low stone wall fronting Warrington Road. Outbuildings at the rear of the pub currently enclose a small yard area. To the north and west, the site bounds residential properties. Vehicular access is taken from Holt Lane.
- 3.2 Residential properties are also located on the opposite side of Warrington Road and Holt Lane to the south and east of the site. The locality is predominantly residential in character, although a small parade of shops lies 400m to the south-east. Rainhill local shopping centre lies a further 600m to the east, situated close to Rainhill Station.
- 3.3 Holt Lane also forms the boundary between Knowsley Council, in which the site is located and St Helens Council which is located to the east.

4 PLANNING POLICY

- 4.1 Planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 In this case, the Development Plan comprises the **Knowsley Replacement Unitary Development Plan** which was formally adopted in June 2006. The **Knowsley Local Plan Core Strategy** was adopted in January 2016. An additional document, containing Site Allocations and Development Policies is expected to be prepared, but has not yet reached consultation stage.
- 4.3 There have been no Neighbourhood Areas or Neighbourhood Forums designated in the vicinity of the application site, and therefore no Neighbourhood Plan in progress. The only studies or documents in the Council's Evidence Base relating to retail development date from 2009/2010 and are considered to now be outdated.
- 4.4 A revised version of the National Planning Policy Framework (NPPF) was issued in July 2021 and is a material consideration in the determination of planning applications, particularly where policies contained therein conflict with or supersede parts of the Development Plan.

Local Planning Policy

Knowsley Replacement Unitary Development Plan

- 4.5 The Knowsley UDP had a vision of sustainable development, encouraging community well-being by developing a vibrant economy with a wide range of job opportunities.
- 4.6 The Retail and Town Centre Development Strategy set out in Policy S1 has been saved and sets out a hierarchy of existing centres, beginning with Kirkby, Huyton and Prescott town centres which have a higher role in the shopping hierarchy, and District Centres with a smaller scale provision, both of which should be the preferred locations for future retail development and leisure uses which attract a lot of people.
- 4.7 Prescott town centre is the main focus for shopping in the area based around a modern indoor centre with small units in older properties and the more recent Cables Retail Park and supermarket to the south, although its catchment is limited by the proximity of St Helens and Liverpool city centre.
- 4.8 There are no defined District centres in the locality of the application site, but a network of small shopping centres and parades are listed in the Appendix and shown on the proposals map. Permission will be granted in these centres for small scale town centre uses provided that the development accords with Policy S2 (compatible with the scale and role of the centre) and that local shopping needs would still be met by existing shopping facilities within safe and convenient walking distance of where people live in the surrounding area.
- 4.9 Policy S8 which dealt with town centre uses outside existing town, district or local centres has not been saved as it has been overtaken by changes in national planning policy.
- 4.10 No part of the application site is allocated for any form of development, nor protected by any site-specific policies, although it does lie in a Primarily Residential Area.

Knowsley Core Strategy

- 4.11 In respect of retailing and town centres, Policy CS6 identifies that Huyton, Prescot and Kirkby town centres will provide comparison and convenience shopping, whilst Local Centres will provide local shopping and service provision of an appropriate scale relative to the size and function of each centre. Local Centres are categorised taking account of their content. Major Local Centres will have a minimum of 12 occupied units, with at least six local service operators and two convenience stores. Medium Local Centres will have a minimum of eight occupied units, with at least four local service operators and one convenience store. Minor Parades lie outside the hierarchy in Policy CS6 but remain important for local service provision.
- 4.12 Retail proposals outside these centres will only be permitted if they would complement regeneration; avoid significant impact upon the viability and vitality of the town, district and local centres (subject to an assessment threshold); and comply with the sequential test.
- 4.13 The sequential test is set out in Policy CS4 and reflects the approach in NPPF. There is no policy to set local thresholds for impact assessment, although the supporting text to Policy CS6 confirms that this may be required if the development exceeds 2,500sqm (as reflected in NPPF).

Evidence Base

Town Centres and Shopping Study

- 4.14 In November 2009 Stage I of a Town Centres and Shopping Study (TCSS) was prepared by Roger Tym & Partners which included analysis following a household shopper survey; healthchecks of the town, district and local centres; and an expenditure analysis based on the results of the survey.
- 4.15 A Stage II report was completed in May 2010 containing an assessment of the quantitative and qualitative need for retail and leisure development to 2026 and a suggested strategy. The Study informed the preparation and content of the Core Strategy.
- 4.16 In light of the age of the studies and economic/physical changes which have taken place since, these documents are not considered to be up-to-date and do not provide a satisfactory basis for evaluating or determining the application.

National Planning Policy Framework (July 2021)

- 4.17 A revised version of the National Planning Policy Framework (NPPF) was updated in July 2021 and sets out the Government's planning policies for England and how these are expected to be applied. It maintains the aim of contributing to the achievement of the three dimensions of Sustainable Development: Economic, Social and Environmental. It urges local planning authorities to approach decision-taking in a proactive way to foster the delivery of sustainable development.
- 4.18 Paragraph 11 of the NPPF identifies a presumption in favour of sustainable development which means approving development proposals that accord with an up-to-date development plan without delay.
- 4.19 Paragraph 81 places significant weight on the need to support economic growth and productivity, and confirms that planning decisions should help create the conditions in which businesses can invest, expand and adapt.

- 4.20 In respect of Town Centres, paragraph 86 states that decisions should support the role of town centres, taking a positive approach to growth, management and adaptation. Planning policies should identify the scale of future floorspace required, but there is no longer a requirement for applications to demonstrate a ‘need’ for additional or replacement facilities. Town centres should be allowed to grow, diversify, respond to change and allow a suitable mix of uses.
- 4.21 Town Centres are defined in the Glossary at Annex 2. These include city centres, town centres, district centres and local centres, but exclude small parades of shops of purely neighbourhood significance.
- 4.22 The sequential approach outlined in Paragraph 87 indicates that applications for main town centre uses should be located in town centres first.
- 4.23 Where a development outside a town centre is above the relevant threshold (2,500sqm unless locally set), applications should include assessment of:
- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Planning Practice Guidance

- 4.24 The chapter on planning for Town Centres and Retail (last updated 18 September 2020) contains a section on ‘Assessing proposals for out of centre development’, including advice on how the sequential test should be used in decision-making. Para 011 states that the application of the test will need to be proportionate and appropriate for the given proposal.
- 4.25 Para 015 states that the impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority.

Judicial Precedent

- 4.26 Finally, the Courts have from time-to-time interpreted planning policy in relation to a number of matters put before them. The conclusions drawn in such cases will be material considerations in the determination of planning applications.
- 4.27 In relation to the application of the sequential approach, the 2012 case at Dundee¹ established that the question to be answered was “whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site”.
- 4.28 The Dundee case set the tone for subsequent sequential assessments which are no longer required to demonstrate the degree of flexibility including disaggregation previously sought. This approach was confirmed in the Ministerial Decision at Rushden Lakes in 2014².

¹ Tesco Stores Limited (Appellants) v Dundee City Council (Respondents) (Scotland)

² APP/G2815/V/12/2190175, 11 June 2014

5 RETAIL ASSESSMENT

Proposed Development

- 5.1 The new store adjacent to the Holt public house will comprise a local convenience store, with a sales area of 225sqm, which is substantially below the 280sqm threshold in the Sunday Trading Act. It will allow for an improved range and choice of goods in a modern new retail environment with an open and spacious floorplan and a storage area fit for requirements. The location will be easily accessible on foot/cycle, as well as having customer parking spaces and room for on-site deliveries.
- 5.2 The store will serve residents in the eastern part of Whiston, as well as passing trade from visitors and staff at the adjacent hospital which is one of the largest acute hospitals in the area having a catchment serving much of Merseyside and South Lancashire
- 5.3 Some 15+ staff are expected to be employed, and there will be job opportunities for experienced retail employees as well as part-time and shift work for young adults and retirees. Given the nature of local retailing, the majority of staff are expected to be recruited locally, and the scope exists for training and promotion, with sales assistants often continuing on to make a career in the retail industry.

Retail Context

- 5.4 Although Whiston has a recognisable local identity, with a railway station, schools and the hospital, there is no town or district centre at its heart. It is effectively an outlying suburban part of Prescot and is well contained by open land in the green belt, although it merges with Rainhill to the south-east.
- 5.5 The main concentration of town centre uses is therefore to the north at Prescot, with another local centre including a small supermarket at Rainhill, in St Helens Borough. Otherwise, the area is served by a number of local shopping centres and parades, along with community, education, health etc. facilities.
- 5.6 Within 500m of the site the only retail provision is a parade of shops which is undefined in the St Helens Local Plan. Within 1km, there are three defined centres including Warrington Road (West) 'Medium' local centre; Scotchbarn Road; and Milton Ave/Byron Ave, both of which are designated as 'Minor parades'. Rainhill local centre is just over 1km away. The remaining centres, at Dragon Drive ('Medium') and Molyneaux Road ('Medium') are all beyond a 1km catchment, as is Prescot town centre.
- 5.7 Individual small 'corner shops' and takeaways etc. are few and far between, and are not identified individually for the purposes of this assessment

Sequential Assessment

SCOPE OF ASSESSMENT

- 5.8 During the previous application on the site, a sequential assessment was requested from the applicants in accordance with Core Strategy policies CS4 and CS6. The assessment which was provided considered centres in an approximately 500m radius, within which there were no

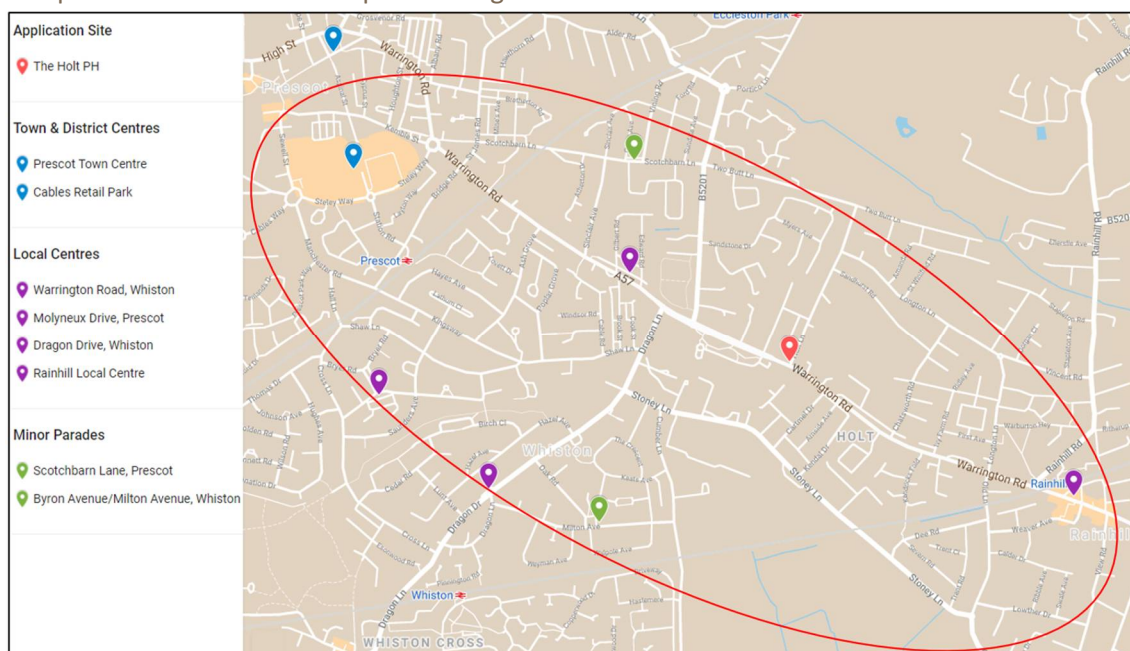
vacant development sites and only one vacant shop which was considered too small to accommodate the proposal.

5.9 In response to the assessment, the Council's Policy Officer³ stated:

*"It appears to me that **to limit the sequential search to 500 metres is not in keeping with Local Plan policy CS6: Town Centres and Retail Strategy** which states 'A sequential approach to site selection shall be applied with locations in existing town, district and local centres of an appropriate scale being considered first, then edge of centre locations and then only if suitable sites are not available should out of centre sites be considered'"*

5.10 Subsequent discussion with the Planning Officer responsible for the application⁴ suggested that a wider catchment area ought to be considered, to include the centres previously assessed, as well as the nearest 'Medium' local centres to the west, Rainhill local centre, Cables Retail Park and the area surrounding it on the southern side of Prescott Town Centre. It was agreed not to include the whole of Prescott Town Centre, as this is already 1.5km from the site; and a location on the northern side of the town wouldn't fall into the natural catchment area of a convenience store on the Holt PH site. (i.e. people from the nearby area would be unlikely to travel to the other side of Prescott to buy day-to-day convenience goods).

5.11 The plan below shows the scope of the agreed assessment.



Catchment Area Plan and Local Centres

5.12 Site surveys were undertaken in early September 2021, accompanied by desktop research to determine the availability of premises for sale/lease.

WARRINGTON ROAD (WEST)

5.13 The closest defined centre to the application site comprises a parade of shops defined as a Medium Local Centre. It contains ten units, and arguably also includes the shop at the petrol

³ Comments from Scott Brett, Senior Planner (Policy) – Major Development Team, 14/06/2020

⁴ Email dated 10/09/2020 from Lee Osborne, Senior Planner, cc Scott Brett

station on the southern side of Warrington Road. There are no vacant/underused land or development sites in or on the edge of the centre and at the time of survey there were no vacant premises.

SCOTCHBARN ROAD

- 5.14 This comprises a small parade of four units and lies outside the retail hierarchy. At the time of survey there were no vacant premises.

MILTON AVE/BYRON AVE

- 5.15 This comprises a small parade of around nine units and lies outside the retail hierarchy. At the time of survey there was one vacant property, at 19 Byron Avenue shown on the plan below, although this did not appear to be being marketed for sale/lease. The property extends to around 100sqm⁵ and is therefore significantly smaller than the proposal on the application site and could not accommodate a store of the size proposed.



Milton Ave/Byron Ave Minor Parade

MOLYNEUX DRIVE, PRESCOT

- 5.16 Molyneux Drive comprises a parade of eight units, although some have been combined from smaller shops. At the time of survey there was one vacant property, at 42 Molyneux Drive, although this did not appear to be being marketed for sale/lease. The property extends to around 50sqm and is therefore very significantly smaller than the proposal on the application site and could not accommodate a store of the size proposed.

⁵ Valuation Office Agency (VOA)



Molyneux Drive Medium Local Centre

DRAGON DRIVE

- 5.17 Dragon Drive comprises a parade of nine units. At the time of survey there was one vacant property, at 16 Dragon Drive, although this did not appear to be being marketed for sale/lease. The property extends to around 60sqm and is therefore very significantly smaller than the proposal on the application site and could not accommodate a store of the size proposed.



Dragon Drive Medium Local Centre

RAINHILL LOCAL CENTRE

- 5.18 Rainhill is defined as Local Centre in the St Helens Local Plan, it includes a small shopping precinct - Dane Court and a number of shop units fronting onto Warrington Road including a small Co-op supermarket. At the time of survey there was no vacant/underused land and no vacant premises.

CABLES RETAIL PARK

- 5.19 Cables Retail Park comprises a Tesco Extra superstore and an L-shaped retail park with a McDonalds drive-through/restaurant. The retail park is not limited to bulky goods operators and accommodates a range of high street/fashion retailers.
- 5.20 Presently, Unit 2 (formerly Argos) and Unit 3 (formerly Warehouse) are both vacant. The Argos unit extends to over 1,700sqm (including a 650sqm mezzanine floor) and the Warehouse unit is 1,200sqm. These units are 4-5 times the size of the proposed convenience store on the application site, and their configuration does not allow for easy subdivision. Arguably, either unit could accommodate a discount retail operator (Aldi, Lidl etc.) with a more substantial footprint capable of trading alongside the Tesco superstore, but would not be suitable for a small neighbourhood convenience store serving the day-to-day needs of a local residential area.



Cables Retail Park, Prescott

- 5.21 The retail park is otherwise fully developed and there is no developable space to accommodate additional new floorspace.
- 5.22 Outline planning permission (Ref. 16/00788/OUT) on the development site to the north at the former W & E Motors, Sewell Street was granted in 2017 for Mixed Use Development (Classes A1, A2, A3, A4, and A5). This followed a number of prior applications, all of which had expired without implementation. It was intended that the 2017 outline approval would provide a

flexible permission with all matters reserved which would allow the site owners to market the site for town centre development to ensure its contribution to the regeneration of the area.

- 5.23 The 2017 permission has now expired without Reserved Matters having been submitted, despite having been actively marketed for a range of retail and other town centre uses. It is understood that the location is now being viewed as more suitable for new leisure and cultural facilities in accordance with the Prescot Masterplan (Site WAA1), possibly including new food and drink units and a potential hotel.

WARRINGTON ROAD (EAST)

- 5.24 Although not defined as a 'town centre' in the St Helens Local Plan the status of the shops at 367-383 Warrington Road had been raised during comments on the 2020 application. This comprises a number of unit shops including a McColls newsagent, recently rebranded as a "Morrisons Daily" following the agreement to supply Morrisons branded goods as part of a wholesale partnership.
- 5.25 NPPF excludes small parades of shops of purely neighbourhood significance from the definition of 'town centres' and for this reason, the location does not offer a sequentially preferable alternative. However it is noted that there is currently only one vacant unit, at 381 Warrington Road following the relocation of Bargain Booze to a larger store at 371-373 Warrington Road (formerly DJ Motors). This extends to around 92sqm and is therefore significantly smaller than the proposal on the application site and could not accommodate a store of the size proposed.



Warrington Road (St Helens) undefined shopping parade

SEQUENTIAL ASSESSMENT CONCLUSIONS

- 5.26 Prescot town centre is beyond the catchment area of the proposed store and beyond a reasonable distance to travel for day-to-day convenience items and top-up shopping from the

application site. The only units at Cables Retail Park are very substantially larger than the unit proposed on the application site which comprises a single storey 342qm retail unit with a sales floorspace of 225sqm. The site at Sewell Street has remained undeveloped for many years and is now destined to become leisure-based.

- 5.27 The closest local shopping centre, at Warrington Road (west) has no vacant/underused land or vacant units. There are single vacant units in one of the Minor parades and in two of the Medium local centres, but all have a much smaller floorspace than that proposed, and none are easily extendable or in a contiguous location where they could be combined with another to meet this requirement. In addition, none of the vacant units have on-site car parking. Convenience store operators aim to provide around 15-20 dedicated on-site customer parking spaces for a store of the size proposed.
- 5.28 Rainford local centre in St Helens district, 1km to the south-east of the site has no development opportunities or vacant retail units. In common with the other centres, it is located in a densely developed urban area and tightly defined by surrounding residential uses. As a result, there is no obvious scope for expansion or the development of vacant or underused edge-of-centre sites at the centres surveyed.
- 5.29 Taking account of the principles confirmed at Dundee (2012) and supported at Rushden Lakes (2014), the appropriate test is therefore not whether a sequential site is suitable for retail development generally, but whether it is “suitable for the proposed development” i.e. in this case including the parking component.
- 5.30 Clearly, all of the vacant units appear to be suitable for retail development generally. However the latter point is extremely pertinent in that without the on-site parking component, the proposed development could not be accommodated at any of the locations identified.
- 5.31 The principle established in case law is that the applicant need not be required to alter or reduce their proposal so that it can be made to fit an alternative site. Indeed, the sequential site which was the subject of the Dundee case was very similar, in that it was not suitable as its car parking facilities were inadequate.
- 5.32 The sequential assessment demonstrates that there are no other sites within or on the edge of nearby centres which would be acceptable for retail development in policy terms, and suitable/viable/available in practical terms.
- 5.33 On this basis, it is considered that the sequential test is satisfied and has demonstrated compliance with Core Strategy Policy CS4 in terms of the sequential approach to site selection. The proposal also accords with the NPPF in this respect.

6 SUMMARY AND CONCLUSIONS

- 6.1 This statement supports an application for a new development adjoining the Holt public house public house to form a new convenience retail unit (225sqm net internal sales area).
- 6.2 The retail unit will be occupied as a local convenience store to help meet the needs of local residents and will serve a local catchment population and some pass-by trade, open from early morning until late evening. The store is expected to carry a basic range of groceries, ready meals, sandwiches and snacks, beers, wines and spirits and a range of fresh fruit and vegetables.
- 6.3 The site is located on Warrington Road, in the south-eastern part of Whiston and accessible to the surrounding residential population to meet day-to-day and top-up shopping needs. The new store will complement the existing small scale retail provision in the local area, allowing for range of convenience shopping. New staff will be employed in the store, with opportunities for part-time working, formal training and career development.
- 6.4 There are no defined town centres in the anticipated catchment area of the store, indeed the only defined town centre – Prescot, is located approx. 1.5km from the application site which is beyond a reasonable distance to travel for top-up shopping. There are a number of local shopping centres and minor shopping parades in the area, but a detailed assessment of these centres has not revealed any sequentially preferable in-centre or edge-of-centre sites which could accommodate the proposed development.
- 6.5 The application site is accessible by public transport and accessible to pedestrians and cyclists; has strong links with the surrounding residential area and a car park to accommodate those who are unable, or choose not to, visit on foot/cycle.
- 6.6 For these reasons, it is considered that the proposed development accords with the provisions of the development plan, and in the absence of any material considerations which indicate otherwise, planning permission should be granted without delay.