



Planning and Retail Statement

Land at Westgate and High Street, Skelmersdale

October 2019

Contents

1.	Introduction	1
2.	Site Description	3
3.	Proposed Development.....	7
4.	Aldi Stores Limited	13
5.	Planning Policy.....	17
6.	Sequential Approach to Site Selection	23
7.	Retail Impact.....	31
8.	Planning Assessment.....	49
9.	Conclusion.....	55

Appendices

Appendix I	Supporting Documents
Appendix II	Catchment Area Plan
Appendix III	Sequential Assessment Pro-Formas
Appendix IV	Retail Impact Assessment
Appendix V	Retail Impact Assessment Methodology

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For and on behalf of Avison Young

1. Introduction

- 1.1 This Planning and Retail Statement ('Statement') has been prepared by Avison Young ('AY') on behalf of Aldi Stores Limited ('Aldi'). It forms part of a suite of documents in support of an application which seeks 'full' planning permission at land at Westgate and High Street in Skelmersdale ("the Site") for:

"Demolition of existing structures and erection of a Class A1 foodstore and flexible use unit(s) with associated access, car parking, servicing and hard and soft landscaping"

- 1.2 The application site extends to approximately 1.19ha and is situated in a prominent location at the corner of High Street and Westgate in Skelmersdale. It is occupied by a 1960's office building which was vacated by its long-term tenant the Co-operative Group in 2016 and has since fallen into disrepair after efforts to find an alternative office occupier failed. Today the site has become a target for vandalism, break-ins and anti-social behaviour. It offers a poor impression of the area, with all windows now boarded up and the site hoarded off from the public. The land is clearly ripe for redevelopment and the significant investment proposed by Aldi will provide the opportunity to radically improve the appearance and profile of this prominent site, whilst also creating 40-50 full and part-time jobs and enhancing consumer choice within western Skelmersdale – where there currently is no 'main' food shopping destination.
- 1.3 The rationale for Aldi submitting this planning application is that the retailer has made the decision to vacate their existing store within the Concourse Centre in Skelmersdale town centre. Aldi has simply outgrown these premises, which offer only two thirds of the amount of sales floorspace that their modern format stores require (1,315 sq.m net). Given its mall location, the Concourse Centre unit also cannot offer the adjacent, dedicated surface level car parking which modern 'bulk' food shoppers have come to expect of foodstores and which Aldi's competitors elsewhere in Skelmersdale are able to provide. This factor has significantly impacted upon sales at the store. Accordingly, Aldi's objective is to bring their latest discount foodstore format to Skelmersdale so that it can better meet the community's needs and enhance consumer choice and competition in the convenience retail sector.
- 1.4 It is important to highlight that the location Aldi has selected for its replacement Skelmersdale store is in very close proximity (less than 200m) to Sandy Lane local centre, with which it benefits from straightforward and safe pedestrian linkages. Sandy Lane is a relatively large local centre and community hub built as part of Skelmersdale's new town designation in the 1960/70's which contains over 30 units (although no 'main' food shopping destination) and takes the form of a two-level covered mall with dedicated car parking. Whilst the centre appears to be largely occupied at ground floor level, it is considered that the provision of a well-connected, edge-of-centre foodstore such as Aldi will significantly boost footfall in the locality, generating spin-off trade for existing Sandy Lane businesses and potentially also attracting new investment in the mall.
- 1.5 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this Planning and Retail Statement assesses the development proposals against relevant policies contained within the adopted Development Plan, key national planning policies and all other material considerations. In addition, this Statement also seeks to demonstrate the wider social, environmental and economic benefits of the scheme.
- 1.6 This Planning and Retail Statement should be read in conjunction with the schedule of supporting technical documents, plans and drawings provided at **Appendix 1**.

1.7 This Statement is structured as follows:

- Section 2 provides a description of the application site and its surroundings;
- Section 3 sets out the details of the planning application proposals;
- Section 4 offers an overview of Aldi and outlines some of the key benefits that the business hopes to bring to the area;
- Section 5 sets out national and local planning policies and guidance;
- Section 6 examines the proposed development against the sequential approach to site selection;
- Section 7 assesses the retail impact of the proposed foodstore scheme;
- Section 8 provides evidence of the proposal's compliance with relevant policies contained within the Local Plan and the National Planning Policy Framework (the 'NPPF') (other than those relating to retail or 'town centre' development); and,
- Section 9 evaluates the development proposals against the policy balance set out within the NPPF and provides overall conclusions.

1.8 This statement is also supported by the following appendices:

- Appendix I – Supporting Documents
- Appendix II – Catchment Area Plan
- Appendix III – Sequential Assessment Pro-Forms
- Appendix IV – Retail Impact Assessment
- Appendix V – Retail Impact Assessment Methodology

2. Site Description

2.1 This section describes the site’s location, its surroundings and the specific characteristics of the site itself.

Site Location

2.2 An extract of the Existing Site Layout Plan is provided below:



2.3 The site is located on the western side of Skelmersdale, in the administrative area of West Lancashire Borough Council and is approximately 175m south of Sandy Lane Centre. It therefore represents an edge-of-centre location in town centre policy terms. With regards the site’s wider locational context, it is some 2km west of Skelmersdale town centre, 1km north-west of Junction 4 of the M58 and 5km south-east of Ormskirk.

Site Description

2.4 The site is irregular in shape and extends to approximately 1.19ha. It is currently occupied by a 1,915 sq.m two-storey 1960’s pre-fabricated office building (Pennylands House) which was originally constructed to house the Skelmersdale Development Corporation during the planning and construction of Skelmersdale new town

during the 1960's and 70's. Following this, the offices were occupied by the Co-operative Group for many years until they vacated Pennylands in 2016. Since this time the site has fallen into disrepair after efforts to find an alternative office occupier failed and today it has unfortunately become a target for vandalism, break-ins and anti-social behaviour. The building is clearly coming to the end of its intended lifespan and now offers a poor impression of the area, with all windows boarded up and the site hoarded off from the public.

- 2.5 Vehicular access to the site is currently taken from the south-western corner and this serves an internal car park of some 100 spaces. The site presently benefits from landscaping on its western boundary but otherwise comprises built form and hardstanding. In terms of topography, the land is largely level but slopes from High Street to the north down to the southern boundary with residential properties.
- 2.6 In summary, the application site extends to approximately 1.19ha and comprises brownfield land in the form of a derelict 1960's pre-fabricated office building which is no longer fit for purpose. It currently suffers from a poor-quality environment and provides an unappealing view for surrounding residents and visitors to the area. It is evident that the redevelopment of the site has the potential to bring about significant environmental and economic improvements by removing the existing vacant structures and replacing them with a high-quality modern foodstore and landscaping. Such a development will radically improve the visual appearance and profile of this prominent site and will also bring it back into a beneficial economic use.

Site Surroundings

- 2.7 The site falls within an area comprising a mix of industrial, commercial, retail and residential uses. Immediately east is Westgate and on the opposite side of this road is a combination of commercial, industrial and other employment uses. For example, uses identified include a children's soft play centre, an ambulance station and various small-scale businesses (including retail, trade counters, storage, manufacturing, etc.).
- 2.8 To the south the site bounds two-storey residential properties with their associated garages, whilst further residential properties are located beyond. Terraced residential properties also bound the site to the east with high-density residential terraced streets further east.
- 2.9 To the north the site is bounded by High Street and on the opposite side of this road are a series of three-storey 1970's residential apartment blocks. Beyond this high-density housing is medical centre (some 100m north) and Sandy Lane local centre. Sandy Lane is a relatively large local centre and community hub built as part of Skelmersdale's new town designation in the 1960/70's which contains over 30 units and takes the form of a two-level covered mall with dedicated car parking. Uses include a small convenience store, off licence, post office, public house, florist, bakery and pharmacy amongst others. The centre is served by dedicated car parks to its north and south and it is noted that there are approximated a further 15 retail and commercial units along Sandy Lane itself, a vehicular highway which runs north from the centre towards Witham Road.
- 2.10 In summary, the application site is surrounded by a combination of commercial, employment, residential and retail uses, reflecting the fact that it is located on the edge of an employment land allocation and close to a defined local shopping centre. Accordingly, the principle of further economic development (retail) in this location is considered to be in-keeping with the general mix of employment generating uses already apparent in the locality, and this is further evidenced by the fact that the Council has seemingly permitted both small scale retail and leisure uses elsewhere on the surrounding industrial estate.

Site Accessibility

- 2.11 Vehicular access to the site will be provided via both High Street and Westgate. Westgate in particular links directly to a the B5321 to the south, which is an arterial road through Skelmersdale (east to west) and connects the site in a straightforward manner to both surrounding residential environs and Skelmersdale town centre some 2km to the east. Indeed, all residential properties on the western side of Skelmersdale fall within a five-minute drive-time of the site and all residencies in Skelmersdale as a whole fall within a ten-minute drive-time – such is the design of the new town’s road network.
- 2.12 The application site is well served by public transport with two bus stops located immediately to the north on High Street. Further bus stops are accessible within 200 metres of the development site on the B5312. The available bus stops provide services to various parts of Skelmersdale (including the Town Centre) as well as Wigan, Southport and Liverpool. The visiting routes include the 310, 375 and 385, with most services visiting once or twice per hour. Further information regarding bus routes serving the site and their frequencies is contained in the accompanying Transport Assessment prepared by Cameron Rose.
- 2.13 With regards pedestrian access, the site benefits from a sizable walk-in catchment given the surrounding densely populated residential areas. Access to the site is provided via existing footways which run along the northern and eastern boundaries and serve both surrounding residential and industrial areas. It is important to highlight that the site is in very close proximity (circa 175m) to Sandy Lane local centre and this wider community hub, with which it benefits from straightforward and safe pedestrian linkages.
- 2.14 The application site is also accessible by bicycle, with the majority of Skelmersdale falling within a five-kilometre cycle catchment (including the residential areas of Ashurst, Birch Green, Elmers Green, Tanhouse and Newgate). Given that the roads local to the site are urban in character, cycling provides the opportunity to access the store by a sustainable mode of transport. It should also be noted that the proposed discount foodstore will have facilities to accommodate long and short stay cyclists.
- 2.15 In summary, the application site is highly accessible by private car, public transport, by bicycle and on foot from surrounding residential areas. It is also located in very close proximity to Sandy Lane local centre and community hub, with which it benefits from straightforward and safe pedestrian access. Given its location and brownfield nature the application site represents a suitable and sustainable redevelopment opportunity in accordance with planning policy.

Planning History

- 2.16 A planning history search for the site identifies a number of planning applications since 2000. However, these have been for minor development and advertisement consent relating to the existing office building and are not therefore of relevance to the current planning application.

Pre-application Discussions

- 2.17 The Applicant has been in discussions with West Lancashire Borough Council regarding the site in the relation to the proposed retail development. A formal pre-application meeting took place in February 2018 where the specifics of the proposals were discussed with officers. Pre-application discussions confirmed that:

- The proposals would entail a major development for town centres uses in an out-of-centre location; and,
- An impact assessment would additionally be required as the proposal is above the locally set floorspace threshold of 1,000sq.m GIA.

3. Proposed Development

- 3.1 This section provides an overview of the proposed development's layout, design, access and servicing arrangements.
- 3.2 The application proposes the erection of a high-quality development comprising a Class A1 'discount' format foodstore and a divisible, flexible Class A1-A3 retail unit together with associated vehicular accesses, car parking, servicing area, and hard and soft landscaping. The redevelopment proposals have been the subject of a pre-application discussion with West Lancashire Borough Council ('the Local Planning Authority') and therefore represent the output of a collaborative process undertaken in line with best practice
- 3.3 The precise nature of the development proposals is set out below. The planning application seeks 'detailed' planning permission for the following:
- Erection of Unit A – Class A1 discount foodstore of 1,863 sq.m Gross External Area (GEA); 1,786 sq.m Gross Internal Area (GIA), and 1,315 sq.m net sales area;
 - Erection of Unit B – 372 sq.m GIA divisible retail unit (Classes A1-A3);
 - 151 car parking spaces, including 9 disabled spaces and 12 parent and child spaces;
 - 20 short-stay bicycle parking spaces (10 cycle hoops) for customers, and long stay bicycle parking spaces (located within the store's warehouse) for staff;
 - 7 motorcycle spaces;
 - Soft and hard landscaping works across the site, including new landscaping to improve the aesthetic appearance of the site along its northern, southern and western boundaries. The existing mature landscaping at the north western corner of the site will also be retained;
 - The retention and expansion of the existing landscape buffer on the eastern boundary of the site in order to help protect the amenities of adjacent residential occupiers;
 - Servicing access, including segregated service road / area along the southern boundary of the site for the foodstore and a devoted servicing lay-by immediately adjacent to the proposed divisible retail units (Class A1-A3);
 - Introduction of a new vehicular access from High Street and the modification of the existing vehicular access from Westgate at the south-western corner of the site.

Overview of Aldi Discount Foodstore Format / Business Model

- 3.4 The following section provides a brief overview of the scale and form of food retail development proposed. In terms of format, the proposed Aldi foodstore will have a Gross Internal Area ('GIA') of 1,786 sq.m and a net trading area of 1,315 sq.m. The trading floorspace within every current Aldi store is consistent at around 1,200sqm to 1,400sqm. This is to enable the range of identical products sold within each Aldi store to be arranged and displayed on a consistent basis. The gross floor area of new Aldi stores (i.e. the trading floorspace plus back of house area) varies slightly within a range of approximately 1,700sqm to 2,000sqm. Again, the aim

is to ensure that the stores are built to a consistent specification in order to facilitate efficient delivery and distribution of products to each Aldi store in the portfolio.

- 3.5 With regards the nature of the food retail development proposed, it is significant that Aldi operate as a 'deep-discount' retailer. This essentially means that the number of core food product lines stocked within each Aldi store is identical and deliberately restricted to around 2,000. This is in stark contrast to the 20,000+ product lines that you would find in a superstore operated by one of the UK's 'mainstream' convenience retailers, and is the reason why all Aldi foodstores are of a uniform size and format.
- 3.6 The core retail offer within an Aldi store (approximately 80% of the net sales area) seeks to replicate the most regularly purchased items within a family's weekly or 'bulk' food shopping trip. The vast majority of products stocked are Aldi branded and through economies-of-scale these goods can be sold at heavily discounted prices without impacting upon quality. Stock is generally presented on pallets or shelves within display ready packing cases to aid efficiency and reduce unnecessary overheads. Savings which can then be passed directly on to the consumer.
- 3.7 Aldi's focus on the key products that typically make up 'bulk' food shopping trips means that they do not sell certain 'ancillary' lines that are normally found in mainstream supermarkets, such as tobacco. In addition, there is no store butchery, fishmonger, delicatessen or hot food-counter, and Aldi's foodstore format does not accommodate customer restaurants or in-store franchises such as a Post Office, pharmacies, dry-cleaning, opticians, betting office or photo processing. These factors are important when considering the trading effects of an Aldi foodstore; as clearly in Aldi's case the potential for cross-over with the offer of independent high-street retailers is far less than it is for 'mainstream' food retailers that stock a far wider spectrum of goods. Retail impact is examined in greater detail in the later sections of this Planning and Retail Statement.
- 3.8 Notwithstanding the above, the Aldi foodstore, as with all modern supermarkets, will also stock a very limited range of non-food goods (approximately 20% of the net sales area). The range of non-food goods in an Aldi store is purely ancillary to the food offer in floorspace terms, and it is also significant that the products stocked mirror seasonal demand such that there is a constant variety in terms of range and choice, with no particular type of comparison goods predominating. In this fashion, the potential for an Aldi foodstore to compete with high-street retailers is extremely limited. This is considered further as part of the retail policy compliance section of this Planning and Retail Statement.

Layout

- 3.9 In terms of layout, as the submitted Proposed Site Layout Plan (Ref. 2269BOL-112) illustrates, the foodstore will occupy a central location within the site with the internal vehicular routes and customer car parking predominantly occupying its eastern and southern sides. The proposed divisible retail unit will be sited immediately north of the foodstore. The accessible parking spaces (9) will be located directly in front of the foodstore building, along with the parent and child spaces (12); both will offer straightforward access to the store entrance. A new vehicular access and egress to High Street will be located on the northern boundary of the application site (north-western corner). Meanwhile, the existing vehicular access from Westgate to the site at the south-western corner will be modified and improved.

- 3.10 The foodstore's entrance will be located at the south-western corner of the building, facing west towards Westgate. It will be positioned to link directly with the pedestrian highways on both Westgate and High Street, whilst also providing sufficient circulation space for those entering and leaving the foodstore with a shopping trolley or wanting to access the ancillary retail unit. The foodstore's servicing area will be positioned on its eastern side (eastern boundary of the site), ensuring that it does not detract from any key views into the site from Westgate.
- 3.11 The positioning of the store such that it lies east to west (as opposed to north to south) is necessitated by the shape of the site, its topography, and having regard to Aldi's uniform rectangular store format. However, such an orientation would have been favoured by Aldi in any case, as it enables the store's entrance to link directly with the pedestrian highways of High Street and Westgate in order to maximise access to the site on foot. This arrangement also provides the most direct pedestrian access to Sandy Lane local centre, which lies some 175m walk north of the site along Westgate.
- 3.12 In summary, the proposed layout offers the greatest potential for integration with existing surrounding uses and residential areas. A key objective of the development from the applicant's perspective (both commercially and in layout terms) is to provide a scheme which responds appropriately to what is a relatively prominent site for those travelling along Westgate. Positioning the foodstore in the fashion proposed offers the potential for unobstructed views into the site for those travelling north and south along the road, a view that would also take in the units' active frontages - highlighting pedestrian movement and providing visual interest. The orientation also maximises linkages with the pedestrian highway leading north towards Sandy Lane local centre.

Design

- 3.13 In terms of design, the proposed foodstore and ancillary divisible retail unit promotes a clean, contemporary approach utilising extensive glazing on its western elevation. The building will benefit from a striking 'blade-roof' feature, projecting south, as well as a glazed entrance façade and grey/black canopy which will project from its southern and western elevations in a consistent manner. With regards scale and massing, the proposed foodstore will be broadly comparable in height with surrounding commercial structures and the residential properties to the north (i.e. broadly 2 storeys). The building will also be of cohesive form in terms of its shape, given the industrial nature of surrounding structures to the west in particular.
- 3.14 The use of glazing to the units' western elevations will offer views into the respective sales areas for passers-by along Westgate, adding interest to these elevations and creating an inviting, active frontage to the scheme. Glazing will also be utilised extensively at the south-western corner of the Aldi store to provide an expansive customer entrance and allow natural light to permeate throughout the store, thus reducing lighting requirements and creating a more pleasurable shopping experience.
- 3.15 The proposed foodstore will be broadly single storey in height but its blade roof design will afford the structure prominence in the site, guiding and inviting the public into the store off Westgate towards the customer entrance elevation. This additional height is particularly important given the incline of Westgate – with the prominence of the blade counteracting the fact that the store essentially sits halfway down a hill. The nature of the store and the operation in terms of use means that the rear elevations (north and east) are relatively

blank in appearance. However, the store has been positioned so that the rear elevations are not in public view, screened as they are by existing buildings.

- 3.16 In summary, the proposed foodstore will be of a contemporary design with a strong horizontal emphasis and constructed using modern methods and materials. The building will be of steel framed construction and will incorporate, in addition to extensive glazing, high-quality red brickwork and render to provide a clean modern finish. This materials palette will also be reflected in the divisible retail unit. Such a design philosophy, drawing upon a simple palette of materials, will ensure that the proposed development does not appear out of place in the context of the surrounding established industrial and commercial uses. A comprehensive overview of the foodstore's design rationale is set out in detail in the accompanying Design and Access Statement.

Cycle and Car Parking

- 3.17 The proposed car park will provide a total of 151 car parking spaces which will be dedicated to those wishing to use foodstore and retail unit, although there will also be scope for informal usage by other visitors – such as those wishing to use the nearby Sandy Lane local centre. It is envisaged that a 90-minute time limit will be placed upon the car park's usage, to enable linked trips to take place whilst preventing long-term abuse. This matter will be subject to further discussions with the Local Planning Authority following the application's submission should this be necessary.
- 3.18 The car park will include 9 accessible spaces for disabled customers and 12 spaces for parents with children. Vehicular access to and egress from the car park will be taken from Westgate at the south-western corner of the site and from High Street on the northern boundary of the application site. Further details of the customer vehicular access and egress strategy are contained in the accompanying Transport Statement prepared by Cameron Rose Associates.
- 3.19 The site will include 20 short-stay bicycle parking spaces (10 cycle hoops) located in front of the western elevation of the foodstore. These spaces will be largely covered by the store's canopy and have good visibility from both inside the foodstore and from those passing along Westgate. Long-stay cycle spaces will be provided in the foodstore's warehouse for staff.

Servicing

- 3.20 Servicing access will be taken from Westgate. The servicing area will be located on the eastern elevation of the store and this will incorporate a loading bay (comprising self-levelling dock), and roller shutter access doors. Goods deliveries will be received to the 'back of house' area which will be accommodated in the eastern part of the Aldi foodstore. The scheme utilises a separate internal servicing access road to that of customer vehicles. Separating the service yard from the customer car park allows the ALDI store to be efficient, practical and safe for use by customers.
- 3.21 For servicing of the secondary unit, it is proposed that this will be integrated within the customer car park by means of a servicing lay-by outside the entrance of the unit(s). Given the modest size of this building, the servicing needs of future retailers will not be of the same magnitude as the proposed foodstore and will cause minimal disruption to the customer usage of the car park.

- 3.22 It is anticipated that the Aldi store will receive an average of four articulated lorry deliveries per day in addition to a milk delivery and bin collection via rigid vehicle. This is substantially fewer than the delivery pattern associated with larger food superstores.
- 3.23 In terms of the servicing procedure itself, in the case of HGV deliveries, this would typically take no longer than one hour and is a straightforward exercise given that Aldi's stock is delivered on pallets which are simply rolled into the warehouse, utilising the automated dock levelling system. Furthermore, as part of Aldi's delivery procedure the responsibility for the unloading of a servicing vehicle rests with its driver, as such there is no potential for delay in the process as it is not necessary to wait for store staff to deal with the vehicle on its arrival (as is the case with many other mainstream convenience retailers).
- 3.24 The articulated vehicles operate from a central distribution centre. Each lorry delivers to a number of stores in a specific circuit and, in this way, minimises vehicle kilometres and therefore reduces emissions. Deliveries to the store will aim to arrive outside of the established highway peak periods, namely 08:00 - 09:00 during the morning and 17:00 - 18:00 during the evening.
- 3.25 Deliveries will be required on every day that the foodstore is open for trade to ensure the availability of fresh produce, including Sundays and Bank Holidays¹. Aldi are seeking permission for:
- Mondays to Saturdays: 06:00 – 23:00 hours; and,
 - Sundays: 08:00 – 18:00 hours.
- 3.26 The same servicing hours are sought for the smaller, ancillary, retail Unit B.

Hours of Operation

- 3.27 Aldi's foodstores are open seven days per week (including the majority of Bank Holidays). The company does not promote 24-hour trading, as is the case with many of the UK's other 'mainstream' food retailers. Accordingly, Aldi could accept a planning condition setting out minimum opening hours of:
- Mondays to Saturdays: 08:00 – 23:00 hours; and,
 - Sundays: 10:00 – 17:00 hours.
- 3.28 Sunday trading laws mean that the Aldi store can only open for up to six hours on a Sunday. This will typically be 10:00 hours to 16:00 hours.
- 3.29 The same servicing hours are sought for the smaller, ancillary, retail Unit B.

Landscaping

- 3.30 Substantial hard and soft landscaping works are proposed both within and around the perimeter of the proposed customer car park in order to improve the current position on the site. Low-level screen planting

¹ It should be noted that the majority of Bank Holidays are treated as a typical trading day by Aldi and as such standard Monday to Saturday opening and servicing hours are observed. However, all Aldi stores are closed on Easter Sunday, Christmas Day, Boxing Day and New Year's Day.

along the Westgate frontage will seek to soften the edge of the site from the highway, whilst the existing mature landscaping at the north-western corner will also be retained. The key design principles that the landscaping scheme will adhere to are detailed within the accompanying Design and Access Statement. As part of the design solution, particular emphasis has been given to the site's eastern boundary, to ensure that appropriate vegetation is provided to create a buffer with the closest residential properties adjacent.

Control of Ancillary Retail Unit (Unit B)

- 3.31 The proposed ancillary retail unit (Retail Unit B) will have a Gross Internal Area of 372sqm. Its purpose will be to provide a supplementary offer to the proposed discount foodstore and as such it will have an ancillary role and might take the form of a coffee shop, estate agent, sandwich shop or similar use. However, at the time of writing it is not possible to verify the future occupant of the proposed unit. As such, the applicant is seeking a degree of flexibility to allow the unit to trade within Use Classes A1 (shop), A2 (Service) or A3 (café / restaurant) upon first occupation. This will maximise the prospects of the unit being let at the point of the scheme's completion.
- 3.32 It is considered that an appropriately worded planning condition could be used to achieve the initial flexibility sought; this could be worded as follows:

"Unit B as identified on approved Site Layout Plan Ref. 2269BOL-112 shall be permitted to operate within Use Classes A1, A2 or A3 (or in a combination of these uses should it be subdivided) upon its first occupation"

Summary

- 3.33 In summary, the proposed Aldi foodstore and ancillary unit will represent a high-quality development and will promote a contemporary design to the benefit of the local and wider environment. Full details regarding the design of the foodstore building and proposed materials are contained in the plans and elevations submitted with this application are detailed in the accompanying Design and Access Statement, which should be referred to for further design related information.

4. Aldi Stores Limited

Who is Aldi?

- 4.1 Aldi is one of the world's leading grocery retailers. The company has built a network of stores in Europe, the USA and Australia. Aldi first entered the UK market in 1990 and has now expanded to over 700 stores across England, Scotland and Wales.
- 4.2 Aldi stores offer the customer a carefully selected range of high quality, exclusive own label groceries at heavily discounted prices. These prices are guaranteed across the entire range of products. The aim is for goods to be sold with discounts of between 20–30% for a full shopping trolley.
- 4.3 Aldi regularly receives industry awards recognising the quality of its products and customer experience. Aldi was voted the nation's Favourite Supermarket and Favourite Wine Retailer at the 2017 Good Housekeeping Food Awards; named Fresh Produce Supermarket of the Year at the FPC Fresh Awards 2017; and Supermarket of the Year at the 2016 Retail Industry Awards. For recognition of investment in people, Aldi was crowned Employer of the Year at The Grocer Gold Awards 2017.

How Aldi is different

- 4.4 Aldi has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, from supplier to customer. This enables Aldi to sell high quality products, from a limited core range (compared to other supermarkets) of mainly exclusive own labels, at the lowest possible price consistently across the entire range. Aldi is a 'deep discount' retailer.
- The main points of the trading philosophy include:
 - Maximum operational efficiency and cost control;
 - Standard merchandising through the stores;
 - Bulk displays in original shipping cases;
 - Efficient operation from supplier to customer;
 - Unique delivery system;
 - Efficient checkout system;
 - Carefully selected and limited core range of circa 2,000 products;
 - Own label high quality products;
 - Formidable buying power;
 - High volume and turnover per product; and,
 - Heavily discounted prices providing an average 20-30% saving across the entire range, compared with similar quality products.

- 4.5 The consequence of providing this value retailing concept and service, of high-quality food at heavily discounted prices, is that the design of the store and the sales area are uniform, in order to accommodate bulk food displays and provide the operational efficiency that a discount foodstore requires. These efficiencies are found across the entire operation from supplier to retail store and result in an enviable cost structure which allows Aldi to sell quality food at low prices and operate on much smaller margins than other foodstores.
- 4.6 As stated, Aldi stores offer a carefully selected and limited core range of good quality exclusive own labels at heavily discounted prices. Predominantly, the limited range of goods relates to a reduced range of variations on the same product line compared to most other supermarkets. These are the most popular items: the ones most used and needed in every household.
- 4.7 By limiting the core range, Aldi suppliers typically only need to produce one package size instead of multiple packages within the same category. With the higher volume of one item, Aldi achieve greater purchasing power. The limited core range further allows Aldi to apply its own label to most of its products (c.90%) which do not include costs that the national brands pass on through higher prices. This allows Aldi to gain a significant cost advantage over competitors without compromising quality.
- 4.8 The deliberate intention is to restrict the range of core goods to circa 2,000 products in the interests of the consumer and operational efficiencies and pass these savings onto the customer. The restricted core range ensures a high volume and turnover of each individual item, resulting in a favourable cash flow with products effectively sold through the checkouts before they have been purchased centrally.
- 4.9 This is unlike the larger supermarkets which stock in the region of 20,000 - 40,000 product lines, and more modest sized operators, with floor areas of 1,000 – 1,500sqm selling 2,500 – 4,000 products. Aldi do not sell cigarettes and tobacco products or pharmaceutical products. The Aldi trading philosophy does not include a specialist butcher, fishmonger, in-store bakery, delicatessen or hot food counter which are commonplace in larger supermarkets. Aldi stores also do not accommodate in store cafes/restaurants or franchises such as Post Offices, photo processing, dry cleaning or opticians.
- 4.10 Whilst the core range of products is limited, Aldi offers a significant choice of locally sourced produce. Where possible Aldi's fresh meat and produce is UK sourced. Fresh fruit and vegetables are also sourced in the UK when in season and Aldi leads the way in supporting British farmers. In addition, Aldi works with a range of local businesses and suppliers in order to supply fresh bread, milk and other dairy products.
- 4.11 Aldi's stores dedicate approximately 20% of their floorspace to comparison goods. These goods are sold as 'special purchases' on a 'when it's gone, it's gone' basis. This approach is highly seasonal and there is a continued variation in the type of goods that may be on offer. This is a key difference for Aldi when compared to larger supermarkets that typically have 30-40% of their floor area for comparison goods, the majority of which is occupied by permanent product ranges.
- 4.12 How Aldi differs is demonstrated clearly by the trading philosophy. Aldi complement, rather than compete with, existing local traders, independent retailers and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade which brings qualitative benefits.

Sustainable Development

- 4.13 Aldi supports sustainable development and has a strong track record in delivering schemes which contribute to the needs of the local economy.

Catchment

- 4.14 As Aldi stores are of modest scale and fulfil a neighbourhood shopping role, it means more than one store can be accommodated in a Local Authority area. The catchment for a store is localised and Aldi's investment to enhance its qualitative offer can reduce the need to travel.
- 4.15 Aldi's local presence can assist in clawing back expenditure being spent elsewhere by providing a food store where perhaps such a facility was not available. This is most important in locations where shops and services are limited and access to stores elsewhere is difficult. A new store helps to retain expenditure within a given catchment area, to the benefit of the community.

Store Operation and Design

- 4.16 The uniform internal layout of an Aldi store reflects the company philosophy of offering value for money through cost effective management and efficiency. The shop fittings are specifically designed and constructed to display the goods as received in their packing cases so there isn't a double handling of goods from packing cases to the shelves. It means new stock can be moved from the warehouse area to the shop floor quickly and in large quantities.
- 4.17 The operation of the store is designed to be efficient and practical for use by customers; ensuring the store offers inclusive accessibility to all. The efficient layout with typically only 4 or 5 aisles means customers can move through the store quickly. There is ease of access to goods with all shelving being within easy reach. As the range of goods is limited customers can find what they are looking for quickly. With goods being pre-packaged, such as fruit and vegetables, customer can identify goods quickly and shop efficiently. Importantly, there are long conveyors at the check-out that hold a customer's full shop to allow goods to be unloaded for scanning and payment quickly. Goods are re-loaded back into the trolley at the check-out and packing is undertaken at the customer's leisure beyond the check-out area.
- 4.18 Aldi recognises that design is a key consideration in the determination of applications for its stores. The external design has evolved over time and now the design for each store is consistent across Aldi's portfolio, promoting modern, smart buildings with clean lines and glazed frontages which meet customer expectations.

Accessibility

- 4.19 The local nature of many of Aldi's stores encourages high levels of pedestrian shoppers and users of public transport. At new stores, cycle stands are provided, close to the store entrance for natural surveillance and mostly under the store canopy, to encourage cycling as a mode of transport.
- 4.20 Aldi requires new stores to have car parking adjacent to cater for customers who choose this mode of transport. Most car trips to new Aldi stores are not new to the network but rather transferred or linked trips.

Residential Amenity

- 4.21 The opening hours of Aldi stores are often more limited than some other larger supermarkets which operate 24-hours.
- 4.22 As Aldi stores are often located in residential areas, Aldi is committed to being a responsible neighbour and seeks to ensure the amenity of residents is maintained. Aldi has practices and procedures to be a good neighbour to surrounding residents and businesses.

Job Creation and Training

- 4.23 New Aldi stores generally employ between 30 - 50 staff. It is Aldi's preference to recruit staff locally. The company's remuneration and training policy reflects Aldi's firm belief that a well-trained and highly motivated workforce is essential to the success of the business. All hourly paid wages for store employees exceed the Government's National Living Wage and the Living Wage Foundation's recommended national rate. Aldi offers full training for all its positions and the schedule and facets of the training are tailored to the individual.
- 4.24 Aldi has two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team.
- 4.25 Aldi's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.
- 4.26 The construction of a new store requires the services of local building trade contractors which provides employment opportunities during the build out period. Usually a range of skills such as ground works, steel, brick and block work and shop fitting are sourced locally, as well as cleaners and labourers.

5. Planning Policy

5.1 This section provides a review of the relevant planning policy and guidance at the national and local level in so far as it is material in assessing the merits of the Site for the proposed development.

National Planning Policy Framework (NPPF)

5.2 On 19th February 2019 the Government published the revised National Planning Policy Framework (NPPF). The 2019 Framework is a material consideration in the determination of planning applications and fully replaces the 2012 and July 2018 editions.

5.3 The NPPF does not change the statutory status of the Development Plan as the starting point for decision making. It advises that proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

5.4 The overall emphasis of the NPPF is to reiterate the Government's key objectives of facilitating economic growth and securing sustainable development. These overarching policies seek to deliver development in the most appropriate locations, thereby protecting and enhancing the environment.

5.5 Central to the NPPF is a presumption in favour of sustainable development and the need for the planning system to support economic growth in line with the Planning for Growth Ministerial Statement. Paragraph 11 sets out the presumption in favour of sustainable development and the application of the policy for decision making. It states:

"Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

- *Approving development proposals that accord with an up-to-date Development Plan without delay; or*
- *Where there are no relevant Development Plan policies, or policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole."*

5.6 Paragraph 12 sets out that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. LPAs may take decisions that depart from an up-to-date Development Plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Building a Strong, Competitive Economy

- 5.7 Paragraph 80 sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity.

Ensuring the Vitality of Town Centres

Sequential Approach

- 5.8 Paragraph 86 of the NPPF sets out that LPA's should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre, nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 5.9 Paragraph 87 sets out that when considering applications outside of centres, preference should be given to accessible sites which are well-connected to the town centre. Applicants and LPAs should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge-of-centre sites are fully explored.

Retail Impact

- 5.10 Paragraph 89 sets out that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, LPAs should require an impact assessment if the development is over a proportionate, locally set threshold (or otherwise over 2,500 sq.m). This should include an assessment of:
- 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,
 - 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).
- 5.11 Paragraph 90 of the NPPF is clear that where an application fails to satisfy the sequential test or is likely to have a 'significant adverse' impact on one or more of the considerations in paragraph 89, it should be refused. The implication being that were such conflicts are not identified Planning Permission should be granted.

Promoting Healthy Communities

- 5.12 Paragraph 91 of the NPPF (2019) sets out that planning decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address local health and well-being needs. For example, through the provision of access to healthier food and layouts which encourage walking and cycling.

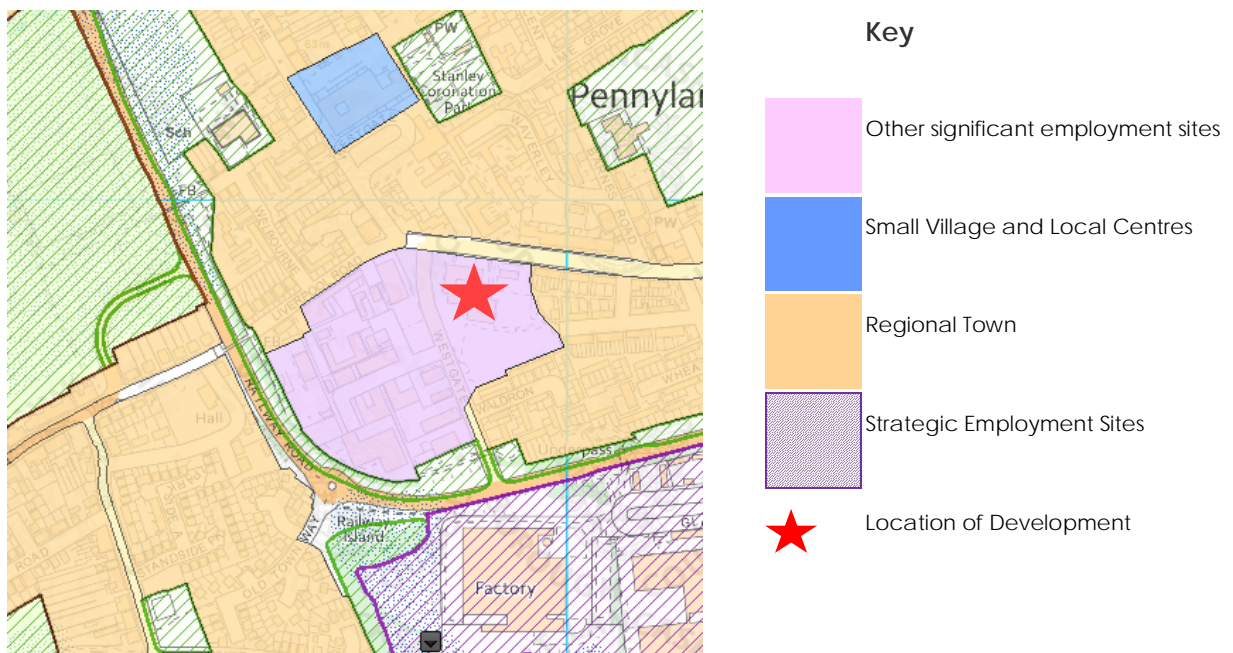
National Planning Policy Guidance

- 5.13 On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the Planning Practice Guidance ('Practice Guidance') web-based resource. The Practice Guidance does not constitute a statement of Government policy; however, as a guide to interpreting how policy should be applied, it may be material to individual planning decisions.
- 5.14 Of particular relevance to applications for retail development is the chapter titled '*Town Centres and Retail*'. This provides guidance on the interpretation of the sequential and impact tests, amongst other matters. A summary of the key sections within this chapter are set out below.
- 5.15 The section, '*Which indicators should be used to determine the health of town centres?*' sets out the matters that are of greatest relevance in assessing the vitality and viability of town centres. These can be summarised as follows:
- Diversity of uses;
 - Proportion of vacant street level property;
 - Retail representation and intentions to change representation;
 - Pedestrian flows;
 - Accessibility;
 - Balance between independent and multiple stores;
 - Extent to which there is evidence of barriers to new businesses opening and existing businesses expanding;
 - Opening hours/availability/extent to which there is an evening and night time economy offer; and,
 - State of Town Centre environmental quality.
- 5.16 The section, '*What is the sequential test?*' explains that the purpose of the sequential test is to guide 'main town centre' uses towards town centre locations first, and then, if no town centre locations are available, to out-of-centre locations, with a preference for accessible sites which are well connected to the town centre.
- 5.17 When applying the sequential test as part of the decision-making process, the Practice Guidance explains that it is for applicants to demonstrate compliance and that failure to undertake the exercise could in itself constitute a reason for refusing planning permission.
- 5.18 There are a number of considerations that should be considered in determining whether a proposal complies with the sequential test. Of particular significance is the requirement to examine whether there is scope for 'flexibility' in the format and/or scale of the proposal. In the case of retail development, this typically involves considering whether there is any 'flexibility' in a specific business model. For example, whether multi-level formats are possible, and whether flexible car parking arrangements can be pursued. It may involve looking into the introduction of innovative servicing solutions or if there is a willingness to depart from standard formats.
- 5.19 It is significant that 'disaggregation' (breaking a scheme up across several sites) is not identified as a matter necessary for consideration in demonstrating 'flexibility' in the context of the sequential test.

- 5.20 The section, 'How should locational requirements be considered in the sequential test?' highlights that the use of the sequential test should recognise that some 'main town centre' uses have particular market and locational requirements. This means that certain uses may only be accommodated in specific locations and LPAs should be acceptant of this where a robust justification is provided.
- 5.21 The section, 'How should viability be promoted?' emphasises that whilst the sequential test seeks to deliver the Government's 'town centre first' policy, promoting new development in town centre locations can be more expensive and complicated than building elsewhere and LPAs therefore need to be realistic and flexible in terms of their expectations.

Local Planning Policy

- 5.22 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the development plan unless material considerations indicate otherwise. The adopted statutory Development Plan for the purposes of this application comprises the West Lancashire Local Plan (2012-2027). Emerging policy includes the Local Plan Review.
- 5.23 The proposals map illustrates that the Site is not allocated for any specific purpose.



West Lancashire Local Plan (2012 - 2027)

- 5.24 The latest update to the Local Plan is the West Lancashire Local Plan (2012-2027). It was adopted by Council on 16 October 2013.

Use

- 5.25 Policy EC1 ('The Economy and Employment Land') states that over the life of the Local Plan there will be a need for 75ha of land to be newly developed for employment uses across West Lancashire as a whole. Employment development should continue to provide for the advanced manufacturing and distribution

industries but should also encourage higher quality business premises and offices for business and professional services.

- 5.26 Part (b) of Policy EC1 sets out that the Council will permit industrial, business, storage and distribution uses (B1, B2 and B8) on Other Significant Employment Sites. The policy aims to maintain the Borough's employment land supply and maximise opportunities for new economic investment in the Borough. Other development is allowed where this is overwhelming evidence that a site is unsuitable and unviable for employment-only development.

Town Centre Hierarchy and Retailing

- 5.27 Policy IF1 ('Maintaining Vibrant Town and Local Centres') states that retail and other appropriate town centre developments will be encouraged within town and local centres, followed by edge-of-centre locations, in line with national policy. Retail and other main town centre uses will only be considered in out-of-centre locations if a specific local need is proven for the proposed development and there is no suitable site available within a town, village or local centre. When considering edge-of-centre and out-of-centre sites, a preference will be given to accessible sites that are well connected to the town centre.
- 5.28 Policy IF1 also sets out a local impact threshold. A threshold for comparison retail that involves an increase in floorspace of over 500 sq.m gross or supermarkets that involve an increase in floorspace of over 1,000 sq.m will require an impact assessment.
- 5.29 Policy GN5 ('Sequential Tests') clarifies that sequential tests will be required for retail and other town centre uses on sites outside town centres. In undertaking a sequential site search it is highlighted that the onus is on the applicant to demonstrate that there are no alternative sites in preferable locations that could reasonably be expected to accommodate the proposed development within the expected project timeframe.
- 5.30 Policy GN5 indicates the following requirements in order to achieve a satisfactory sequential test:
- An area of search depending upon the scale and nature of the proposal. This will be determined by consideration of the area of identified local need;
 - Comprehensiveness of search;
 - Availability / viability / deliverability of sequentially preferable sites; and,
 - Suitability of sites to accommodate the proposed development.

Other Relevant Policies

- 5.31 Other policies considered relevant in the consideration of the proposed development include:

West Lancashire Local Plan (2012)

- Policy GN3 ('Criteria for Sustainable Development');
- Policy IF2 ('Enhancing Sustainable Transport Choice');
- Policy IF3 ('Service Accessibility and Infrastructure for Growth');

- Policy SP1 ('A Sustainable Development Framework for West Lancashire');
- Policy SP2 ('Skelmersdale Town Centre - A Strategic Development Site');
- Policy EN1 ('Low Carbon Development and Energy Infrastructure'); and,
- Policy EN2 ('Preserving and Enhancing West Lancashire's Natural Environment').

Material Considerations

Design Guide SPD

- 5.32 This SPD provides an overview of the design principles for new development and sets down the expectation the Council will have when considering planning applications. This document places an importance on the design of all new development and details the ways in which development should be developed having regard to external appearance, materials used, the principle of form and layout. This SPD additionally places an emphasis on the importance of residential amenity and the steps proposals should undertake to avoid overlooking, overshadowing and creating an overbearing impact.

Summary

- 5.33 This section has identified a series a Development Plan Documents and other material considerations to be taken into account in the determination of the application. These matters will be weighed in the planning balance.

6. Sequential Approach to Site Selection

- 6.1 Both Policy IF1 ('Maintaining Vibrant Town and Local Centres') of the West Lancashire Local Plan (2013) and Paragraph 86 of the NPPF (2019) require that the sequential approach to site selection is applied to all retail development proposals on sites that are not 'in' an existing centre nor allocated in an up-to-date development plan.
- 6.2 In this instance, the nearest defined centre to the application site is Sandy Lane local centre, a large purpose-built two-storey mall comprising some 30 units and with a further 15 units in its immediate vicinity (on Sandy Lane itself). The north-western extremity of the application site is located approximately 175m south of the local centre's defined boundary and can be accessed by a straightforward, well-lit and safe pedestrian route (Westgate). Given the site's proximity to the centre and the ease of pedestrian access, it can be classified as a well-connected edge-of-centre location in town centre policy terms (with Annex 2 of the NPPF defining an edge-of-centre location as one which is well connected to and up to 300 metres from a primary shopping area).

Catchment Area and Centres Assessed

- 6.3 Whilst both the NPPF and National Planning Practice Guidance (NPPG) are silent on the appropriate area of search for sequentially superior sites, a standard approach to consider is the extent of the catchment area likely to be served by the proposal and then to identify alternative sites, located within or on the edge of existing centres which serve an equivalent catchment, and which could accommodate the scale and form of development proposed.
- 6.4 In this instance, the scale and form of retail development is a Class A1 foodstore of 1,786sqm GIA (1,315sqm net sales), a standalone divisible retail unit of 372sq.m, alongside requisite customer car parking (151 spaces), access roads, servicing area and associated hard and soft landscaping. Given that a discount foodstore format is proposed, the vast majority of the goods stocked will be food items, with a focus on staple convenience goods purchased as part of a 'weekly' food shop.
- 6.5 The foodstore's limited size and offer provides a strong indication that its Primary Catchment Area will not be particularly extensive and is unlikely to extend beyond Skelmersdale and its associated rural hinterlands of Newbrugh, Appley Bridge, Rainford and Up Holland. This is reinforced by the fact that the household shopper survey which informs the Council's 2018 Retail Study shows that the existing Aldi store in the Concourse Shopping Centre and the larger Asda store at Ingram Road both attract most of their trade from Skelmersdale and the surrounding locality. This area equates to Zones 3a and 3b of the study area of the West Lancashire Retail Study. During pre-application discussions with the Local Planning Authority, it was agreed that the two centres to be examined within this catchment area are Skelmersdale town centre and Up Holland local centre, with all other local centres of insufficient size to accommodate a discount foodstore.
- 6.6 In summary, the above analysis has clearly justified that a logical area of search for sequentially preferable sites should, in this instance, encompass 'in' and better connected 'edge-of-centre' opportunities within (and immediately surrounding) Skelmersdale town centre and Up Holland local centre. Within the defined area of search, candidate sites must be able to accommodate (as a minimum) a Class A1 foodstore of 1,786sqm GIA

(1,315sqm net sales), a standalone divisible retail unit of 372sq.m, alongside requisite customer car parking (151 spaces), access roads, servicing area and associated hard and soft landscaping. A site will be considered sequentially preferable where it is 'suitable' and 'available' which necessarily includes consideration of deliverability/viability.

Application of the Sequential Test

6.7 The NPPG provides advice on how the sequential test should be applied to development proposals. The NPPG states that it is for the applicant to demonstrate compliance with the sequential test and sets out the key considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- With due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the Town Centre. Any associated reasoning should be set out clearly.
- Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential Town Centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
- If there are no suitable sequentially preferable locations, the sequential test is passed.

Rushden

6.8 Further guidance on the application of the Test has been clarified in the Call-In Inquiry at Rushden². The development comprised a mixed retail and leisure scheme at Rushden Lakes including over 38,000sqm of retail floorspace provided across three retail terraces and one large home and garden centre. In addition, the proposals included a number of restaurants, a visitor centre, a hotel and a leisure centre.

6.9 With regard to the Sequential Test, the Inspector clarifies a number of key methodological points first raised by the Dundee Supreme Court Case. These are:

- When considering the suitability of alternative sites, the Test should consider sites that are "suitable for the development proposed by the applicant (paragraph 8.43);
- When considering the suitability of alternative sites, the applicant should not reduce the proposal to fit onto another site (paragraph 8.44);
- There is no requirement in the NPPF to consider disaggregating the proposed development onto a number of smaller sites (paragraph 8.47);
- When considering the suitability of alternative sites, the issue of flexibility relates to flexibility in a business model; use of multi-level stores; flexible car parking arrangements, innovative servicing solutions; and a willingness to depart from standard formats (paragraph 8.49); and,

² Land Adjacent Skew Bridge Ski Slope, Northampton Road, Rushden; Planning Inspectorate Ref. APP/G2815/V/12/2190175; 11 June 2014.

- When considering the availability of sites, the Test should consider only sites that are available at that time and not sites that are likely to become available during the remainder of the plan period or over a period of some years (paragraph 8.55).

6.10 In his decision letter, the Secretary of State agrees with all of these conclusions.

6.11 Whilst a number of the above principles remain relevant for the sequential test, the publication of the revised NPPF in July 2018 confirms that, contrary to the above, the sequential test should consider sites that are expected to become available within a reasonable period.

Cribbs Causeway

6.12 More recently, the Cribbs Causeway 'call-in' decision (PINS Ref. APP/P0119/V/17/3170627) has clarified that the meaning of the sequential test is a matter of law whereas how it is applied is a matter of judgement.

6.13 The NPPF and NPPG indicate that when looking at the suitability of potential sequential sites, flexibility should be demonstrated on issues such as format and scale. The Inspector cites relevant case law in relation to a retail scheme in Mansfield, where it was held that alternative sites should be suitable for the broad type of development proposed in respect of the approximate size, type and range of goods.

6.14 In terms of disaggregation, the Inspector sets out that as a general principle, an approach that involves disaggregation does not fit well with case law and by dividing proposals, the broad nature of the development would change.

6.15 For availability, the decision reiterates that an 'appropriate timescale' is a matter of planning judgement, as is made plain in the Lionbrook court judgement. Cribbs Causeway decision also refers to Rusden Lakes, setting out that the decision does not mean that there is no scope for flexibility in considering timescales or that the circumstances of the case may not be taken into account. This includes factors such as the anticipated start on site, planning policy and complexity of site assembly and preparation.

Flexibility

6.16 In terms of the minimum size of site required to accommodate an Aldi foodstore (the scale and form of development proposed), land extending to at least 0.7ha is typically required. This area can be broken down as follows: the foodstore itself with a gross external area of approximately 0.185ha (circa 1,850sq.m GIA and 1,315 sq.m net sales area), requisite car parking to accommodate at least 100 customer vehicles (c.0.25ha), internal access roads / circulation space (c.0.1ha), servicing area (c.0.05ha); and other external space and hard / soft landscaping (c.0.1ha). However, in this case the scheme also involves a small flexible-use retail unit of 372 sq.m and accordingly the minimum size of site required is considered to be 0.8ha given this additional building and its associated parking and infrastructure.

6.17 At approximately 1.19ha, the application site proposed on land at Westgate and High Street is evidently 50% larger than Aldi's standard site requirement, primarily given the irregular shape of the land and fact that it benefits from a considerable amount of soft landscaping on its western boundary. As such, the applicant is clearly demonstrating 'flexibility' in line with the NPPF's requirements by testing a much smaller site area (0.8ha) than is actually the subject of this planning application.

Sites Assessed and Findings

- 6.18 Having established the appropriate catchment area, the centres to be assessed within it, and the scale and form of retail development to be tested (having regard to flexibility); this analysis now turns to consider any candidate sites which are potentially 'suitable' and 'available'. A detailed Sequential Site Assessment Summary Schedule is set out at **Appendix III** which covers each of the five sites identified in detail. However, we briefly summarise the position in relation to each below:

Site	Summary
<p>Skelmersdale Town Centre Redevelopment Proposal, Ingram Rd / Northway, Skelmersdale</p>	<p>The Ingram Rd / Northway site in Skelmersdale town centre is an in-centre site with a lengthily recently planning history. It is currently predominantly grassland with low density shrubbery and tree coverage and includes a cleared site (formerly the West Lancashire College building). Since 2012 the land has been granted permission for several mixed-use development proposals which will deliver a combination of both retail and leisure uses, including a cinema, foodstore and non-food retail uses.</p> <p>In 2018, two applications were submitted in tandem which sought to fix the final details of the town centre scheme ahead of its phased construction. A Section 73 application will, amongst other things, enable retail Unit C to be split into two clearly defined units, one of which (2,062 sq.m GIA) will accommodate B&M and the other a non-food retailer of 1,091 sq.m GIA. The second application sought detailed permission for a discount foodstore of 2,008 sq.m GIA / 1,265 sq.m net to specifically meet the requirements of Lidl in terms of size, format and operation, with Lidl confirmed as the end user for the unit. Both of these applications were granted permission in September 2019.</p> <p>In examining the Ingram Rd / Northway scheme's 'suitability' to accommodate the scale and form of retail development proposed, it is significant that the Aldi foodstore would have a GIA of 1,786 sq.m and a net sales area of 1,315 sq.m. This net sales area in particular is a minimum requirement for the retailer as part of all new stores because it is this that their store format (and by extension their business model) is based upon.</p> <p>In the context of the town centre development scheme, it is clear that the recently approved discount foodstore unit is unable to accommodate Aldi's minimum net sales area requirement or format, with it being tailored specifically for Lidl. The B&M unit (Unit C1) would equally be unable to meet Aldi's format requirements, given that it only contains 497 sq.m of convenience goods floorspace. The remaining non-food unit which sits alongside B&M (Unit C2) is ruled out as it has a much smaller net sales area of 764 sq.m. Finally, the proposed 'flexible use' retail units (totalling 527 sq.m) would be too small to accommodate the Aldi foodstore, even in combination.</p> <p>On this basis, none of the retail units granted permission as part of the Ingram Rd / Northway scheme can be regarded as 'suitable' alternatives for the scale and form of retail development proposed. The Ingram Rd / Northway scheme must therefore be dismissed as a sequentially preferable alternative to the planning application site.</p> <p>Turning to 'availability', the Ingram Rd / Northway site is evidently not 'available' to accommodate the scale and form of retail development being proposed by Aldi – which differs from Lidl's model. With contracts exchanged between Lidl and St Modwen, it is considered highly unlikely</p>

	<p>that the discount foodstore element of the town centre scheme is 'on the market' for acquisition by Aldi or indeed any other retailer.</p> <p>Indeed, as soon as construction of the Lidl foodstore commences in the coming months the sequential test becomes irrelevant, as there simply is no longer a comparable market opportunity within the town centre to debate. It will be in the process of delivery and cannot therefore be seen as 'available' by any real-world measure. Accordingly, the weight to be attached to the Ingram Rd / Northway site at this point in time as a sequential alternative is questionable.</p> <p>In summary, the sequential assessment set out at Appendix III of this Planning and Retail Statement has demonstrated that the Ingram Rd / Northway site does not represent a sequentially preferable alternative for the foodstore proposed on the planning application site. It is clear that the tailored units recently granted planning permission for both Lidl and B&M are neither 'suitable' nor 'available' for the specific scale, form and format of development required by Aldi. A more detailed overview of the site and our analysis is set out at Appendix III of this Planning and Retail Statement.</p>
<p>Land adjacent to College Way, Skelmersdale</p>	<p>This site extends to 1.36ha and is located adjacent to West Lancashire College (south-west) and an Asda superstore (east) within Skelmersdale town centre. For the purposes of the sequential test the site is considered to be an in-centre location.</p> <p>Whilst the site is in principle large enough to accommodate a discount foodstore, much of the land already benefits from planning permission for a new college technology centre and the residual area is insufficient to accommodate the proposed scale and form of retail development. Furthermore, the land (which is in the ownership of West Lancashire College) represents the optimum location upon which to expand the college facilities over time. Accordingly, it is considered very unlikely that it would be made available to the applicant for redevelopment for retail purposes.</p> <p>On this basis, it must be concluded that the College Way land is not a sequentially preferable alternative to the application site. A more detailed overview of the site and our analysis is set out at Appendix III of this Planning and Retail Statement.</p>
<p>Existing Aldi Foodstore, Ground Floor, Concourse Shopping Centre, Skelmersdale</p>	<p>The existing Aldi foodstore on the ground floor of the Concourse Shopping Centre extends to 1,080 sq.m GIA / 887sq.m net sales. Aldi has decided to vacate the premises given that it no longer meets their corporate requirements, providing only broadly two-thirds of the net sales area required by their modern format stores. For the purposes of the sequential approach we have therefore tested the unit as if it were vacant.</p> <p>In terms of suitability, Aldi's existing foodstore at the Concourse Shopping Centre, Skelmersdale achieves only broadly two thirds of the retailer's present-day net sales area requirements (1,315 sq.m). This has been a key factor in Aldi's decision to vacate the premises. It simply no longer conforms with their business model by virtue of its limited size and can be dismissed as 'unsuitable' on this basis.</p> <p>A further suitability constraint is the fact that the access arrangements to the available car parking at the Concourse Centre is very difficult for Aldi's shopping trolley users. It involves a significant walk of close to 200m (minimum) through the mall and then on to the surface level or multi-storey car park. An Aldi store's primary focus is to serve the needs of 'bulk' food shoppers seeking to purchase a wide range of staple goods on a weekly basis, this constraint prevents the unit achieving this objective and renders it unsuitable.</p>

	<p>Finally, the Concourse Shopping Centre closes at 17:30 on most days of the week and this is considerably earlier than Aldi's nation-wide opening hours. Aldi would not be able to accept this restriction had they been looking to locate in Skelmersdale in the present day and, as such, the limited opening hours available represents a further reason why the existing unit is 'unsuitable' in our view.</p> <p>Given the above evidence, it must be concluded that whilst Aldi's existing unit is 'available' (acknowledging Aldi's impending departure), there are a variety of reasons why it would not be 'suitable' for occupation by the retailer in the present day. Accordingly, it is not a sequentially preferable alternative to the application site. A more detailed overview of the site and our analysis is set out at Appendix III of this Planning and Retail Statement.</p>
<p>Unit 31, First Floor, Concourse Shopping Centre, Skelmersdale</p>	<p>Unit 31 of the Concourse Shopping Centre appears to be the largest vacant unit in the shopping centre at the present time. It extends to 1,390 sq.m GIA and is located on the first-floor mall, close to retailers including Wilko and CEX and banks including Barclays and TSB. There is no direct customer car parking adjacent to the unit, with this accessed via the mall entrance / exit to the north.</p> <p>With regards the unit's suitability, it has a gross floorspace some 25% smaller than Aldi's proposed store. Even allowing for some flexibility, it would be unable to achieve Aldi's critical net sales area target of 1,315 sq.m alongside all necessary back-of-house provision. It must therefore be regarded as 'unsuitable' for the scale and form of development proposed.</p> <p>A further suitability constraint is the fact that pedestrian access to the available car parking at the Concourse Centre is particularly difficult for shopping trolley users from first floor level. It involves a lengthily walk through the mall (including potentially down one level) and then on to the surface level or multi-storey car park. An Aldi store's primary focus is to serve the needs of 'bulk' food shoppers seeking to purchase a wide range of staple goods on a weekly basis, this constraint prevents Unit 31 achieving this objective and renders it unsuitable.</p> <p>Finally, the Concourse Shopping Centre closes at 17:30 on all but two days of the week and this is considerably earlier than Aldi's nation-wide opening hours. Aldi are unable to accept this restriction as evidenced by the operational hours that they seek for all of their new foodstores (08:00 to 22:00). The limited opening hours available at the Concourse Centre represents a further reason why the existing unit is 'unsuitable' in our view.</p> <p>Given the above evidence, it must be concluded that whilst Unit 31 is evidently 'available', there are a variety of reasons why it would not be 'suitable' for occupation by Aldi in the present day. Accordingly, it is not a sequentially preferable alternative to the application site. A more detailed overview of the site and our analysis is set out at Appendix III of this Planning and Retail Statement.</p>
<p>Land to the north of Up Holland Local Centre, Up Holland</p>	<p>Land to the rear of Up Holland Local Centre is irregular in shape and extends to approximately 0.60ha. It forms part of the recreational space associated with St Thomas the Martyr CoE Primary School, with access taken from Highgate Road. Immediately south is Up Holland Local Centre (Ormskirk Road), with the primary school to the north and residential properties to the east and west. It represents a well-connected edge-of-centre site.</p> <p>In terms of suitability, the recreational land to the north of Up Holland Local Centre is of insufficient size to accommodate the proposed development (even allowing for flexibility) and must therefore be dismissed as unsuitable. Furthermore, it is protected Green Infrastructure</p>

	<p>/ Open Recreation Space (Policy E3) in the adopted Local Plan and this policy constraint also renders the site unsuitable.</p> <p>Finally, the site's access and egress along a narrow residential street (Highgate Road) is also likely to be unacceptable and a further reason for the site being deemed unsuitable. In addition to these suitability constraints, we do not believe that the land would be made available to the applicant for redevelopment, as it is in use as recreational space associated with a primary school.</p> <p>Given the above evidence, it must be concluded that the land to the north of Up Holland Local Centre is neither suitable nor available. Accordingly, it is evidently not a sequentially preferable alternative to the application site. A more detailed overview of the site and our analysis is set out at Appendix III of this Planning and Retail Statement.</p>
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Market Opportunity Factors and the Sequential Approach

- 6.19 An important point to make when applying the sequential test in the context of Skelmersdale town centre is that the consented Lidl will effectively be replacing the discount foodstore offer currently provided in the town centre by Aldi at the Concourse Shopping Centre – given the impending closure of this foodstore. In this fashion, there remains a second discount foodstore 'market opportunity' within the catchment based on the existing / committed position.
- 6.20 Lidl are evidently already prepared to take the Ingram Rd / Northway site despite the existence of a mainstream discount foodstore already serving Skelmersdale (Aldi, Concourse Shopping Centre), thereby introducing a second discount foodstore to Skelmersdale. We would agree that in quantitative terms Skelmersdale's Primary Catchment Area of some 55,000 people (£110m convenience goods expenditure) is certainly large enough to sustain two discount foodstores, and it appears that Lidl hold the same view. We would also add that qualitatively there is clearly scope for two discount foodstores to serve the town, given that the only other realistic offer for bulk food shopping trips is an Asda superstore.
- 6.21 The Retail Study (2018) finds that Asda trades above benchmark average levels based on the existing position in Skelmersdale (i.e. Aldi and Asda being the two largest foodstores) and this reinforces the notion that there is room for a further bulk food shopping destination such as Lidl to improve consumer choice and competition. Accordingly, it surely follows that the closure and relocation of Aldi from the Concourse Shopping Centre to the edge of Sandy Land local centre results in the same scenario as envisaged by Lidl when considering this investment opportunity (i.e. Asda and Aldi being the other competitors in the catchment). In short, Aldi's closure and subsequent relocation cannot be seen as having any bearing on the 'market opportunity' that already exists for a second discount foodstore to serve Skelmersdale and hence there can be no realistic conflict with the sequential approach.
- 6.22 This is an important factor in applying the sequential test, as it cannot be said that both retailers are competing for a single market opportunity within Skelmersdale town centre. All evidence suggests that there are at least two such opportunities in Skelmersdale (alongside the Asda store), with the two discount retailers seemingly already prepared to trade alongside one another.

Conclusions

- 6.23 The sequential assessment set out above (and in greater detail at **Appendix III** of this report) has demonstrated that there are no sequentially preferable development sites within or on the edge of Skelmersdale town centre or Up Holland local centre which could realistically accommodate the scale and form of retail development for which planning permission is sought – even when demonstrating significant flexibility in terms of developable area.
- 6.24 Added to this is the simple point that Aldi already support the vitality and viability of Skelmersdale town centre and have done for many years. However, their business model has simply outgrown existing premises within the Concourse Shopping Centre and hence their requirement to move to an alternative location in Skelmersdale which will not only better meet customer expectations but will also help to support the vitality and viability of Sandy land local centre – given its well-connected edge-of-centre location. Lidl's impending introduction into Skelmersdale town centre will replace Aldi's current offer with a larger, more accessible foodstore and hence the centre will continue to benefit from an equivalent retail offer to that which has historically been provided by Aldi. In these circumstances, it cannot be said that both retailers are competing for a single market opportunity and, given that a discount foodstore will be retained within the town centre, it is not considered that it will be disadvantaged overall. This represents important context to the interpretation of the sequential approach in this case.
- 6.25 Overall, for the reasons outlined in this section, it is considered that there are no more 'suitable' and 'available' more centrally located sites for the scale and form of development proposed and compliance can therefore be demonstrated with the sequential approach to site selection as set out in Paragraph 86 of the NPPF and Policy GN5 of the West Lancashire Local Plan.

7. Retail Impact

Policy Context and Introduction

- 7.1 Paragraph 88 of the NPPF identifies that local planning authorities should require an impact assessment to be submitted in support of planning applications for main town centre uses over 2,500sq.m (unless a local planning policy sets a lower threshold), on sites outside town centres, and that are not in accordance with an up to date Development Plan. The impact assessment should include a consideration of:
- 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,
 - The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment.
- 7.2 With regards local planning policy concerning the vitality and viability of defined centres, Policy IF1 of the adopted Local Plan is clear that when assessing proposals outside of town centres for supermarket development, an impact assessment will be required where the scheme is in excess of 1,000 sq.m GIA. The policy also states that out-of-centre retail development will only be considered acceptable where a specific local need is proven for it. However, this latter requirement is at odds with more recent town centre policy contained within national guidance (i.e. NPPF February 2019) which has removed the 'retail need' test. Accordingly, whilst we give full weight to Policy IF1's requirement for an impact assessment to be undertaken, we consider that any requirement to demonstrate compliance with a 'need test' is at odds with current national planning policy. Accordingly, impact is the focus of the justification set out in this section of our Planning and Retail Statement.
- 7.3 In interpreting national town centre policy concerning retail impact, it is noteworthy that Paragraph 90 of the NPPF states that where an application is likely to give rise to a 'significant adverse impact' it should be refused. The implication being that an impact which is merely 'adverse' is not a direct reason for refusal and is capable of being weighed against positive social, economic, and environmental impacts in the overall planning balance. Indeed, Paragraph 14 of the NPPF confirms a presumption in favour of sustainable development and is clear that planning permission for development should be granted unless: *"any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when considered against the policies in this document as a whole"*.
- 7.4 Through the impact assessment required by local and national policies, it is necessary to demonstrate that there would be no 'significant adverse' impact in two main regards. The first is on existing, committed and planned public and private investment in a centre, whilst the second is on town centre vitality and viability including local consumer choice and trade in the town centre and wider area.
- 7.5 Each of these tests are considered in turn within this section of our report. We focus firstly upon impact on trade / vitality and viability and secondly on impact on investment, principally because some of the conclusions in relation to 'impact on investment' are informed by the retail impact assessment, discussed as part of the impact on trade section.

Impact on Town Centre Vitality and Viability, Including Local Consumer Choice and Trade in the Town Centre and Wider Area

- 7.6 Applicants are required to assess the impact of edge and out-of-centre retail proposals on town centre vitality and viability, having regard to both local consumer choice and trade in the centre and wider catchment area up to five years (i.e. to 2024) from the time the application is made.
- 7.7 Paragraph 89 of the NPPF requires the preparation of a Retail Impact Assessment (RIA) in order to examine impacts upon trade and this can be found at **Appendix IV** of this Planning and Retail Statement. In the interests of clarity, we have assessed retail impact by following a standard and recognised step-by-step methodology (as set out within the Planning Practice Guidance), which is summarised below. For ease, we also set out at **Appendix V** an easy reference table summarising the methodological assumptions and data inputs which have informed the retail impact assessment.

Catchment Area

- 7.8 The foodstore's limited size and offer provides a strong indication that its Primary Catchment Area will not be particularly extensive and is unlikely to extend beyond Skelmersdale and its associated rural hinterlands of Newbrugh, Appley Bridge, Rainford and Up Holland. This is reinforced by the fact that the household shopper survey which informs the Council's 2018 Retail Study shows that the existing Aldi store in the Concourse Shopping Centre and the larger Asda store at Ingram Road both attract most of their trade from Skelmersdale and the surrounding locality. This area equates to Zones 3a and 3b of the study area of the West Lancashire Retail Study.
- 7.9 It is also noted that the retail impact assessment prepared in support of the discount foodstore planned as part of the Ingram / Southway town centre redevelopment scheme in Skelmersdale (Ref. 2018/0898/FUL, approved Sept 2019) adopts an equivalent Primary Catchment Area of Zones 3a and 3b of the West Lancashire Retail Study.
- 7.10 Whilst our Retail Impact Assessment assumes that the vast majority of the scheme's trade (97.5%) will be drawn from those residing within the Primary Catchment Area (Zones 3a and 3b) and the wider West Lancashire Area (Zones 1, 2a and 2b), it is also anticipated that a small proportion will be drawn from beyond in the form of inflow expenditure (2.5%). The following factors are of relevance in terms of the modest proportion of trade that will be drawn from beyond the defined catchment:
- There is potential for those employed in major industrial facilities in Skelmersdale but who live outside the settlement to use the store as part of their journey to or from work;
 - An Aldi store in this location would represent the retailer's closest fascia to many of the small rural settlements to the south of Skelmersdale, such as Rainford and Billinge. A modest amount of inflow expenditure from this adjoining borough is therefore entirely plausible; and,
 - Finally, inflow of 2.5% is assumed in the convenience goods capacity assessment prepared as part of the West Lancashire Retail and Leisure Study 2018.
- 7.11 In summary, the defined catchment area is proportionate to the trading influence of the proposed retail development, on the basis of our experience elsewhere. The area assessed is considered to be a

representative catchment area for the scale and form of retail development proposed, in-line with the advice provided in the Practice Guidance. The catchment area can be found at Appendix IV of this Planning and Retail Statement.

Convenience and Comparison Goods Quantitative Impact

Turnover of Proposed Retail Development (Table 1)

- 7.12 Table 1 of Appendix IV estimates the convenience and comparison goods turnover of the proposed Aldi foodstore. The Aldi store will have a total net sales area of 1,315 sq.m. Of this sales area the vast majority will be given over to the sale of convenience goods (80% / 1,052 sq.m), with the remainder used for the sale of a purely ancillary range of non-food (comparison) goods (20% / 263 sq.m). The foodstore's convenience / comparison goods floorspace split has been provided by Aldi and the retailer would be willing to accept a planning condition limiting trading floorspace to the percentages tested.
- 7.13 A sales density of £11,147 per square metre (2017 Prices) has been applied to the convenience goods floorspace of 1,052 sq.m to provide a maximum convenience goods turnover of £11.73m in our base year of 2019 (increasing to £11.87m in 2024). It is worth highlighting that the sales density utilised is derived from GlobalData (formally Verdict) 2019 and is verified by Aldi Stores Ltd as being consistent with their future sales expectations of a foodstore of this size. In terms of comparison goods, a sales density of £7,409 per square metre has been applied to the proposed Aldi floorspace of 263sqm to provide a maximum comparison goods turnover of £1.95m in 2019 (increasing to £2.23m in 2024).
- 7.14 With regards the proposed smaller 'flexible use' retail unit of 371 sq.m, we have assumed a total net sales area of 298 sq.m for this building based on a net to gross ratio of 80%. Whilst it is currently unknown whether the unit will be occupied by Class A1, A2 or A3 uses, for the purposes of robustness in undertaking the impact assessment we have assumed that half (149 sq.m) will be Class A1 convenience goods floorspace and half Class A1 comparison goods floorspace. In both cases we have applied a sales density of £5,000 per sq.m to this floorspace, which is considered to be reflective of the scale and form of unit proposed. This would translate into a convenience and comparison goods turnover of £0.74m in 2019, increasing to a £0.75m convenience turnover and £0.85m comparison turnover in 2024.

Population (Table 2a and 11a)

- 7.15 The base population (2019) within our Primary Catchment Area (Zones 3a and 3b) and buffer zones (Zones 1, 2a and 2b) has been sourced directly from Experian Location Analyst software (bespoke report dated September 2019). The baseline population has then been projected forward to the test year of 2024 utilising the population growth forecasts which are provided by the Experian report (based on latest births, deaths and inward/outward migration trends).
- 7.16 On this basis, the defined Primary Catchment Area comprising Skelmersdale and its rural hinterlands is identified to contain a resident population of approximately 54,358 people in 2019, which is set to increase to 55,125 people by 2024. This represents growth of 767 people over the next five years. Looking at the West Lancashire study area as a whole, it has an estimated population of 129,198 people in 2019, rising to 130,354 people in 2024 – growth of some 1,156 people over the next five years.

Per Capita Expenditure Assumptions (Tables 2b and 2c Convenience Goods and Tables 11b and 11c Comparison Goods)

- 7.17 Per capita convenience and comparison goods base expenditure data for our catchment area has been sourced from Experian Location Analyst software (September 2019). Our analysis of both convenience (Table 2b) and comparison goods (Table 11b) expenditure capacity draws upon 'forecast' growth rates as set out under Figure 6, Appendix III, of the Experian Retail Planner Briefing Note 16 (December 2018). Forecast expenditure growth rates are derived from a forward-looking economic model rather than being based on past trends (as is the case for 'projected' expenditure growth rates); they are therefore most reflective of the current position in the economic cycle. However, they are also generally more conservative than 'projected' expenditure growth rates, particularly at present, given that projections iron out the impact of past recessions and economic downturns. Therefore, it is fair to say that utilising forecast growth rates is a robust approach in the context of current market conditions.
- 7.18 In terms of an allowance for Non-Store Retail Trade (NSRT) / Special Forms of Trading (SFT) – such as online shopping, etc. – our assessment is based on the allowance identified at Appendix III, Figure 5, Page 18, of Experian's Retail Planner Briefing Note 16, December 2018 (the latest available). This is based upon assumptions by Experian in regard to the sourcing of on-line food purchases (i.e. the proportion which is actually supplied from the shelves of stores vs. deliveries from non-retail distribution centres to private residences).

Total Convenience and Comparison Goods Expenditure (Tables 2d and 11d)

- 7.19 Tables 2d and 11d of Appendix IV combine population and per capita expenditure estimates to establish total available convenience and comparison goods expenditure respectively within the defined catchment area. Table 2d shows that there is approximately £109.2m convenience goods expenditure within the defined Primary Catchment Area in 2019, increasing to £110.5m in 2024. Across the West Lancashire study area as a whole, available convenience goods expenditure is £284.8m in 2019 and increases to £286.5m by 2024.
- 7.20 Meanwhile, Table 11d of Appendix IV confirms that there is approximately £144.3m of comparison goods expenditure within the defined Primary Catchment Area in 2019 and that this will increase to £166.0m by 2024. This represents five years growth of £21.8m. Turning to the West Lancashire study area as a whole, this generates a total of £405.2m of comparison goods expenditure in 2019, increasing to £463.7m in 2024. This represents comparison goods expenditure growth across West Lancashire as a whole of £58.5m over the five-year period to 2024.
- 7.21 Having regard to the above analysis, it is therefore clear that there is scope for some growth in convenience goods floorspace in the defined catchment, and very significant scope for growth in comparison goods over the next five years on the basis of natural population and expenditure growth alone (i.e. not taking into account factors such as 'overtrading' within existing foodstores).

Existing Shopping Patterns and Expenditure Apportionment (Table 3)

- 7.22 Table 3 of Appendix IV presents the findings of the July 2017 household telephone shopper survey in respect of food (convenience goods) shopping trips for the survey zones which comprise the Primary Catchment Area and buffer zones. With regards the findings of the household survey for facilities in Skelmersdale, our key observations on the convenience goods shopping patterns within the catchment area are as follows:

- The dominant foodstore within Skelmersdale (and West Lancashire as a whole) is the Asda at Ingram Road, which attracts £41m from the West Lancashire study area. It also attracts 37.5% (£26m) of all convenience goods expenditure in Skelmersdale (Zone 3b) and 25.7% (£10m) of the expenditure originating from Skelmersdale's rural hinterlands (Zone 3a).
- The second best performing individual foodstore in Skelmersdale is identified to be the Aldi foodstore at the Concourse Shopping Centre which attracts 11% of the convenience goods expenditure generated in Skelmersdale but a more limited 3% of the expenditure originating from Skelmersdale's rural hinterlands. Overall, the Aldi store has a turnover of £9.4m from the West Lancashire study area, equating to just a quarter of that drawn to Asda, Ingram Road.
- Other convenience goods facilities within the Concourse Shopping Centre (including its Iceland store) have a combined convenience goods turnover of some £13m (2019). The majority of this trade is attracted from the Primary Catchment Area (Zones 3a and 3b) but it is also noted that there is inflow from both Burscough and Ormskirk.
- In terms of the outflow of expenditure from the Primary Catchment Area, it is noted that Skelmersdale (Zone 3b) facilities only have a retention rate of 70%, with notable expenditure (over £20m) leaking to both Burscough and Ormskirk. Indeed, it is noted that some 5.5% (over £4m) of the convenience expenditure generated in Skelmersdale is actually leaking to Aldi foodstores in other zones (Ormskirk town centre and Ringtail Retail Park, Burscough). This suggests that the existing Aldi store in Skelmersdale is not meeting customer expectations.
- With regards Skelmersdale's rural hinterlands to the north (Zone 3a), whilst Skelmersdale is the closest town centre to these settlements, its facilities attract just 32% of the expenditure generated in this zone. The offer in Wigan attracts an equivalent amount despite many of the town's facilities being further away. For example, the Aldi in Standish attracts 10.7% of Zone 3a's convenience goods expenditure even though Skelmersdale's Aldi is closer for much of the zone. Similarly, it is noted that Aldi facilities in both Burscough and Ormskirk attract residents of Zone 3a despite being further away than Skelmersdale. This represents further evidence that Aldi's existing offer in Skelmersdale is perhaps not meeting customer expectations.

7.23 In summary, the household survey which informed the latest West Lancashire Retail Study shows that Skelmersdale benefits from the strongest performing foodstore in the borough (Asda, Ingram Road) and that other retail facilities in the Concourse Shopping Centre contribute to a substantial total town centre convenience turnover of £63.5m in 2019. However, there is also evidence of considerable convenience goods leakage (over £20m) from Skelmersdale to surrounding settlements and it is considered that there is scope to reduce this level. There is also considered to be a legitimate opportunity to attract more convenience goods expenditure to Skelmersdale facilities from the rural north (Zone 3b), with many residents of this zone currently appearing to bypass Skelmersdale and travel further afield for their convenience goods shopping.

Convenience Goods Commitments and Turnover (Table 5)

7.24 Committed retail floorspace is set out in Table 5 of the retail impact assessment. The commitments in Zones 2a and 2b have been taken directly from the capacity assessment undertaken as part of the West Lancashire Retail and Leisure Study (2018). Sales densities / turnovers for these commitments have also been sourced from

the latest retail study and have been projected forwards to the test year of 2024 using Experian Forecast sales densities from Figure 4a (Page 14) of Experian Retail Planner Briefing Note 16, December 2018.

- 7.25 With regards the Ingram / Southway town centre redevelopment site in Skelmersdale, the convenience goods sales area and turnover of this recently consented scheme has been taken from the retail impact assessment that was prepared in support of it (Ref. 2018/0898/FUL, approved Sept 2019). Accordingly, the sales density presented in Table 5 is a product of the retail impact assessment derived scheme turnover divided by the total available convenience floorspace.

Convenience Goods Trade Draw and Allocation – Aldi (Tables 6a and 6b)

- 7.26 The proposed Aldi store's convenience goods trade draw and allocation is set out in Tables 6(a) and (b) of Appendix IV and has been informed by the Planning Practice Guidance; which states that a common starting point for the exercise is to consider the existing trading patterns within the catchment in question (in this case provided by the West Lancashire Retail and Leisure Study) and to then apportion the trade to be diverted based upon the character of development ('like affecting like'), popularity (based upon existing shopping patterns / WYG observations), geographic location (proximity) and brand loyalty factors.
- 7.27 In terms of trade draw, Table 6(a) shows that a significant 85% of the scheme's convenience goods turnover will come from the population residing within what we have defined as the Primary Catchment Area of Skelmersdale and its rural hinterlands to the north (i.e. Zones 3a and 3b). This is considered to be a robust assumption given the scale of foodstore proposed and having regard to the attraction / trading patterns of other existing foodstores within Skelmersdale. A small amount of the foodstore's trade is anticipated to be drawn from Study Zone 2b (10%) and 2a (5%), again reflecting the shopping patterns of existing foodstores in Skelmersdale.
- 7.28 Finally, it is anticipated that 2.5% of the scheme's trade will be drawn from those residing outside the defined catchment area. This latter figure accounts for those visiting Skelmersdale either for employment (i.e. as part of their journey to or from work) or leisure purposes and is consistent with the assumption adopted in the West Lancashire Retail Study 2018. This 2.5% 'inflow' allowance has been accounted for by reducing the scheme's convenience goods turnover by this amount as part of the trade allocation exercise.
- 7.29 With regards convenience goods trade allocation, Table 6(b) shows that, having apportioned the store's anticipated trade across four study zones in the test year of 2024 based on existing shopping patterns and other factors, the majority of its turnover (28.6% / £3.5m) is anticipated to be redirected from the Asda at Ingram Road, Skelmersdale town centre. This is consistent with the fact that this foodstore is not just the dominant destination in Skelmersdale but also West Lancashire.
- 7.30 The next highest diversion is anticipated to be from the Aldi foodstore at Ringtail Retail Park (10.5% of the new store's trade). This reflects the fact that this Aldi foodstore is the most popular in West Lancashire, with a turnover well above benchmark and draws residents from both Zones 3a and 3b. It stands to reason that a better, closer Aldi facility at High Street in Skelmersdale will claw back some of this lost trade.
- 7.31 Trade has also been assumed to be diverted from other facilities within Skelmersdale, reflective of their relative influence over shopping patterns locally (based on household survey results). For example, a total of 1.5% of Aldi's turnover will be diverted from Iceland, Concourse Shopping Centre and 3.7% from other facilities in the

Concourse Shopping Centre. This is consistent with the fact that these smaller stores largely cater for 'top-up' shopping requirements as oppose to the 'bulk' food shopping trips generally catered for by an Aldi foodstore.

- 7.32 It has been assumed that 8.7% of the proposed Aldi foodstore's trade will be diverted from the committed Ingram / Southway town centre scheme in Skelmersdale. This is reflective of the fact that, once constructed, it will be anchored by a Lidl foodstore which will inevitably compete on a 'like-affects-like' basis with Aldi (and vice versa).
- 7.33 Overall, it can be seen from Table 6b that the proposed Aldi foodstore will divert in the order of 50% of its convenience goods turnover from facilities in the Primary Catchment Area (principally Skelmersdale). We believe that this represents a reasonable and realistic assumption, particularly given the fact that the level of convenience goods expenditure leakage witnessed from Zone 3a to facilities outside the PCA is presently a higher 60%.
- 7.34 Finally, in terms of convenience goods expenditure diversion from other stores beyond Skelmersdale ('clawback'), we have assumed that this will be disbursed across a range of destinations including those in Wigan, Ormskirk and Burscough, in line with existing shopping patterns, and with no single location predominating. In the case of Skelmersdale residents, we have assumed that the foodstore will 'claw back' some £3m of convenience goods expenditure which is currently leaking to facilities outside the settlement (i.e. beyond Zone 3b). With regards the Primary Catchment Area as a whole (Zones 3a and 3b), it is anticipated that the scheme will clawback in the order of £4.9m of convenience goods expenditure.

Convenience Goods Trade Draw and Allocation – Commitments (Tables 7a, 7b, 8a and 8b)

- 7.35 With regards the town centre redevelopment scheme at Ingram / Southway in Skelmersdale Town Centre, we have assumed identical trade draw assumptions to the proposed Aldi foodstore at High Street (see Table 7a). This is reflective of the fact that the majority of this scheme's convenience goods floorspace will take the form of an equivalent discount foodstore (Lidl). We have also made very similar assumptions to the Aldi store when considering the trade allocation of the Lidl store, as highlighted in Table 7b. This is simply because it stands to reason that a further discount foodstore serving the same catchment will logically have an equivalent sphere of influence over shopping patterns (resulting in comparable impacts). The key difference is that it has been assumed that the Ingram / Southway scheme will divert some of its trade from the proposed Aldi at High Street as 'like-affects-like' (just as it has been assumed that Aldi will divert some of its trade from Ingram / Southway).
- 7.36 In terms of remaining committed developments, the exercise of allocating the trade diversion of these commitments across existing destinations within the defined convenience goods catchment areas is undertaken at Tables 8a and 8b of Appendix IV of this Planning and Retail Statement. Again, this allocation has been based on existing shopping patterns and the scale and form of development proposed. In each case the impacts originating from these commitments are very localised given that they are small scale in nature. Indeed, it is important to note that none of the commitments are to be found in Skelmersdale itself.

Re-allocation of Turnover – Aldi, Concourse Shopping Centre (Table 10a)

- 7.37 Before discussing the solus and cumulative trading impact of the proposed development and commitments, it is important to explain how Aldi's impending closure at the Concourse Shopping Centre (Skelmersdale town

centre) has been dealt with as part of our retail impact assessment. For robustness, it has been assumed that the Aldi store will close prior to the construction of either the Ingram / Southway scheme or an Aldi foodstore at High Street.

7.38 Table 10(a) therefore re-allocates the existing Aldi store's projected turnover across the other facilities in Skelmersdale on a proportionate basis, based on each facility's current market share from the West Lancashire study area as a whole. This is considered the most appropriate way to re-allocate the store's existing turnover, with logic suggesting that those who currently use Aldi (largely Zone 3a and 3b residents) will simply turn to alternative local foodstores elsewhere in Skelmersdale, unless and until a replacement discount foodstore is provided elsewhere in the town.

7.39 As Table 10(a) shows, the outcome of this re-allocation of trade is that the Asda store at Ingram Road would benefit from an uplift in trade of some £6.7m (69% of the Aldi store's turnover), reflective of the fact that it is already currently the dominant foodstore locally and the obvious alternative for bulk food shoppers in particular once Aldi has closed. Convenience goods floorspace within the Concourse Shopping Centre is also anticipated to benefit, with some £0.51m (5.3% of Aldi's turnover) anticipated to flow to the existing Iceland store and a further £1.6m (16.8% of Aldi's turnover) flowing to the centre's other convenience goods floorspace – based on an extrapolation of existing shopping patterns. Finally, other retail facilities within the Skelmersdale area are anticipated to be boosted by an additional £0.84m following the Aldi store's closure (8.7% of Aldi's current turnover).

Convenience Goods Trading Impact (Tables 9 and 10b)

Centres other than Skelmersdale

7.40 Turning to retail impact, and in considering the scheme's trading effects (solus impact) on both centres and facilities outside of Skelmersdale but within West Lancashire, it is clear from Table 9 of Appendix IV that these will be relatively modest in terms of their magnitude. For example, in the case of both Burscough and Ormskirk the 'solus' (or singular) impact of Aldi upon both town centres will be less than 3%. This is clearly well below the threshold of what could be defined a 'significant adverse' impact upon trade.

7.41 With regards impact upon centres outside West Lancashire altogether it is evident that a proposal of this scale will have no long-term implications for trade in the likes of South Ribble, Wigan and Sefton. Indeed, table 9 suggests that the Aldi store would result in only a 10% impact (reduction) on the circa £20m convenience expenditure which currently flows from the West Lancashire study area to Wigan facilities and centres. Clearly the scheme's actual impact upon the full turnover of food stores / centres in Wigan would therefore be minuscule.

7.42 Table 9 shows that once all commitments are allowed for, impacts upon centres outside Skelmersdale understandably increase, with both the Ingram / Southway Skelmersdale town centre redevelopment scheme and other smaller commitments diverting additional trade. However, even allowing for these 'cumulative' trading effects, we do not believe that they give rise to any 'significant adverse' impacts. For example, the cumulative convenience goods impact upon Burscough is just 9%, whilst the impact on Ormskirk is only slightly higher at 10.7%.

- 7.43 The 2018 Retail Study found Burscough to be a vital and viable centre with a very low vacancy rate and an attractive and well-maintained environment. Accordingly, a cumulative impact of less than 10% on this centre seems highly unlikely to be of significance for its long-term health in our view. Turning to Ormskirk, again the 2018 Retail Study found this town centre to healthy and in particularly praised its “*very good convenience retail offer, popular market and pleasant and accessible town centre environment*” (2018 West Lancashire Retail Study, Paragraph 3.42, Page 25).
- 7.44 The Council commissioned 2018 health check did not raise any serious concerns in relation to Ormskirk’s vitality and viability and furthermore it is important to note that the majority of the cumulative impact in this case is a consequence of a number of small convenience stores that have been granted permission in the vicinity of the town centre (at the former Ropers Arms, Ormskirk and Briars Lane Garage, Ormskirk). Whilst for the purposes of the impact model we have had to assume that their turnover will be diverted from Ormskirk (as the closet centre), the reality is that these convenience stores are too small to have any real implications for the long-term viability of the town centre’s Morrisons, Aldi and M&S stores. Accordingly, given the centre’s health and the nature of the cumulative impacts anticipated upon it, a ‘significant adverse’ impact upon Ormskirk town centre is unrealistic in our view.
- 7.45 Further-a-field, in centres outside West Lancashire borough, it remains our position that the scale and form of development proposed – even in conjunction with commitments – is unlikely to result in any significant adverse impacts upon vitality and viability. In the case of Sefton, Wigan and South Ribble, there will still be considerably more expenditure flowing from West Lancashire to these boroughs than the scheme and commitments will divert. No significant adverse impacts upon trade are therefore anticipated in these neighbouring authority areas.

Skelmersdale

- 7.46 With regards quantitative convenience goods impacts upon foodstores and other shops within and surrounding Skelmersdale, these are focussed upon in detail in Tables 10a and 10b of our retail impact assessment (Appendix IV). Firstly, in terms of the **solus (scheme specific) convenience goods impacts** of the Aldi foodstore, it can be seen that these are relatively modest in scale upon all identified facilities. For example, as Table 7.1 below highlights, the Aldi would result in a 7.2% impact upon the Asda store on Ingram Road. However, this would equate to just £3.5m of the scheme’s anticipated 2024 turnover of some £49m, following the closure of Aldi, Concourse Shopping Centre.

Table 7.1 – Solus and Cumulative Convenience Goods Impacts on Skelmersdale

Zone 3b Destinations	Scheme Specific (Solus) Retail Impact (%)	Cumulative Retail Impact (%)
Asda, Ingram Road, Skelmersdale Town Centre	-7.2%	-13.8%
Iceland, Concourse Centre, Skelmersdale Town Centre	-4.9%	-10.6%
Other, Skelmersdale Town Centre	-3.8%	-9.1%
Ingram / Southway (Lidl), Skelmersdale Town Centre	-8.6%	-8.6%
Total Skelmersdale Town Centre	-8.1%	-14.4%
Other, Zone 3b	-4.5%	-8.2%
Aldi, High Street, Skelmersdale	0.0%	-8.4%

- 7.47 The solus convenience goods impact upon the Iceland at the Concourse Shopping Centre would be less than 5% of its 2024 turnover (£3.7m) – which will inevitably be boosted by the closure of Aldi in the shopping centre. Similarly, impact upon the other convenience shops in the town centre (largely within the Concourse Centre) will be just 3.8% (£0.45m) – reflecting the fact that these smaller shops largely meet top-up food shopping needs as oppose to Aldi’s bulk food shopping offer. In quantitative terms neither of these impacts can be regarded as ‘significant adverse’ in or view, given their limited magnitude. We discuss the qualitative side of Aldi’s impacts in the subsequent section.
- 7.48 In terms of the Aldi store’s trading effects upon the Ingram / Southway Skelmersdale town centre redevelopment scheme, Table 7.1 above suggests a convenience goods impact of 8.6% on the scheme (i.e. Lidl and B&M Bargains) in 2024. It is important to highlight that following this impact the town centre redevelopment proposals would still benefit from a convenience goods turnover of some £11.5m and a comparison goods turnover of some £15m in 2024 (turnover based on the 2019 planning permission, Ref. 2018/0898/FUL). The scheme’s comparison goods turnover would be largely unaffected by the introduction of an Aldi at High Street, given the ancillary nature of this offer within a discount foodstore. If the Ingram / Southway scheme’s comparison goods turnover is aggregated with its convenience goods turnover (totalling at least £27m according to approved application Ref. 2018/0898/FUL), then the Aldi foodstore’s trading impact upon it drops further, to just 4%. Finally, these quantitative factors aside, it is clearly very positive for the Lidl element of the scheme that Aldi will be leaving its Concourse Shopping Centre unit – affording it greater prominence as the only town centre discount foodstore with dedicated car parking. For these reasons, we do not consider that Aldi’s introduction at High Street would result in a ‘significant adverse’ impact upon the trade and turnover of the Ingram / Southway Skelmersdale town centre redevelopment scheme once this is operational.
- 7.49 In addition to considering the Aldi store’s solus (or scheme specific) impact, it is also necessary to test the **cumulative effects of both the Aldi and Lidl foodstores** trading alongside one another. This is set out in the third column of Table 7.1 on the preceding page and Table 10b of Appendix IV.
- 7.50 Looking firstly at the Asda on Ingram Road, it is evident that the cumulative impact of Aldi and commitments on this store will be 13.8% (equating to £6.75m of its convenience goods turnover). However, this must be set in context. Firstly, based on the proportional re-allocation of the existing turnover of Aldi in the Concourse Shopping Centre, Asda stands to benefit from an uplift in its turnover by some £6.7m by 2024 (before accounting for impact by Aldi or any commitments). As such, the future cumulative impact will largely be offset in the shorter term by the additional custom attracted following Aldi’s closure.
- 7.51 In addition to this, based on available sales floorspace data for the Asda foodstore, our understanding is that it has an approximate sales area of 4,241 sq.m. Even on the conservative assumption that only 60% of this is devoted to the sale of convenience goods, that would equate to some 2,625 sq.m of such floorspace. Applying Asda’s benchmark sales density of £14,063 per square metre to this convenience goods floorspace (Source: GlobalData 2019, 2017 prices) generates a company average convenience goods turnover of some £36m. Based on the latest population and expenditure data and growth assumptions, our Table 4 (Appendix IV) shows that using the 2018 West Lancashire Retail Study’s shopping patterns, the Asda store generates a convenience goods turnover of some £41m. Accordingly, evidence would suggest that the foodstore already trades above benchmark levels, and this is before making any allowance for the uplift received following the closure of the Aldi at the Concourse Shopping Centre.

- 7.52 In summary, the Asda foodstore in Skelmersdale town centre is already trading above benchmark levels and stands to benefit further as a consequence of Aldi's closure in the Concourse Shopping Centre. The West Lancashire Retail Study 2019 shows that Asda is not only the dominant foodstore in Skelmersdale but also in West Lancashire as a whole. Accordingly, even though it stands to suffer a cumulative impact of some 13.8% based on the introduction of Aldi and commitments, it cannot be said that the Asda foodstore will suffer a 'significant adverse' impact upon its trade.
- 7.53 Indeed, Table 7.2 below shows that because of the proportional re-allocation of Aldi's (Concourse Shopping Centre) turnover following its closure, Asda would actually have a higher turnover in 2024 than it does today – even after the introduction of all commitments and a new Aldi, High Street store.

Table 7.2 – Actual Changes in Skelmersdale Facilities Convenience Goods Turnover 2019 to 2024

Zone 3b Destinations	Actual Change in Convenience Turnover (2019 - 2024) (£m)	Actual Change in Convenience Turnover (2019 - 2024) (%)
Asda, Ingram Road, Skelmersdale Town Centre	+£0.21	+0.5%
Aldi, Concourse Centre, Skelmersdale Town Centre	-£9.63m	-100%
Iceland, Concourse Centre, Skelmersdale Town Centre	+£0.13m	+4.2%
Other, Skelmersdale Town Centre	+£0.61m	+6.0%
Ingram / Southway (Lidl), Skelmersdale Town Centre	+£11.4m	+91.4%
Total Skelmersdale Town Centre	+£2.8m	+4.2%
Other, Zone 3b	+£0.37m	+7.1%
Aldi, High Street, Skelmersdale	+£11.6m	+91.6%

- 7.54 In the case of Skelmersdale's Iceland and other town centre convenience goods shops, Table 7.1 equally shows that convenience goods impacts will increase on a cumulative basis to 10.6% and 9.1% respectively. However, these impacts again need to be set in the context of Table 7.2, which shows that because of the re-allocation of trade from the closure of Aldi in the Concourse Shopping Centre to these stores, they both actually stand to have a marginally higher convenience turnover in 2024 than they do today – even accounting for the introduction of Aldi and Lidl. Accordingly, it cannot be suggested that these in-centre shops will suffer a 'significant adverse' quantitative impact.
- 7.55 In assessing the quantitative convenience goods impact upon Skelmersdale as a whole, Table 7.2 shows that overall, whilst the town centre will lose Aldi in the Concourse Centre following its closure, it will gain Lidl and B&M as part of the Ingram / Southway town centre redevelopment scheme and therefore its overall convenience goods turnover will increase between 2019 and 2024. This again reinforces our view that the cumulative trading effects of the Aldi foodstore and commitments on Skelmersdale will not be significant adverse and that indeed the town centre still stands to benefit overall, with our impact assessment showing that there will not actually be a net loss for any existing retailer – given anticipated closures (Aldi) and openings (Lidl).
- 7.56 In conclusion, these quantitative findings should not be particularly surprising, in that Skelmersdale already has one discount foodstore (Aldi) and the Council has permitted a second as part of the Ingram / Southway scheme. With Aldi seeking to close their Concourse Centre store and opening a new store at High Street, there

will essentially be no net gain in discount foodstores as a consequence of this application. It therefore stands to reason that the cumulative impacts of the proposal and commitments will not result in any significant adverse convenience goods impacts – just as the Council has accepted in the case of recently approved Lidl scheme (application Ref. 2018/0898/FUL) which equally established the acceptability of there being two discount foodstores to serve Skelmersdale (i.e. Lidl, Ingram / Southway in addition to Aldi, Concourse Centre).

Comparison Goods Trading Impact (Tables 11 and 12)

- 7.57 At just 263 sq.m it is self-evident that the comparison goods element of the proposed Aldi foodstore will be completely ancillary to its convenience goods offer. The Aldi foodstore will function primarily as a 'main' food shopping destination, catering for 'bulk' convenience goods purchases. Comparison goods will generally be purchased on impulse as part of a food shopping trip rather than the store functioning as a comparison goods shopping destination in its own right. It is also important to highlight that products such as babies' nappies, which are common to all convenience stores, are classified as comparison goods. For these reasons, the impact on existing comparison goods turnovers of centres and facilities will inevitably be extremely limited.
- 7.58 From a quantitative perspective, Table 1 of Appendix IV demonstrates that the Aldi store's comparison goods turnover is anticipated to be just £2.2m in 2024 (increasing to £3m with an allowance for the ancillary retail unit). However, to put this into context, Table 12a demonstrates that the scheme's comparison goods turnover equates to just 0.66% of the total available study area comparison expenditure in 2024 and just 5.3% of the forecast growth in comparison goods expenditure in the Study Area between 2019 and 2024. Even if the Primary Catchment Area alone is assessed, Table 12 shows that the scheme's comparison goods turnover equates to just 1.8% of the population's total comparison goods expenditure and only 14.2% of the anticipated growth in comparison goods expenditure in the Primary Catchment Area between 2019 and 2024. In short, Aldi's comparison goods turnover represents a very small percentage of both available expenditure and even the anticipated future growth in expenditure.
- 7.59 This simple quantitative analysis demonstrates that there is no prospect of the very small comparison goods element of the proposed scheme giving rise to 'significant adverse' retail impacts. Growth in comparison goods expenditure is more than sufficient to accommodate the anticipated turnover over the next five years, meaning that any impacts that do result will be entirely benign.
- 7.60 Notwithstanding this, a simple impact assessment is set out in Table 12 of Appendix IV. This focusses on Skelmersdale town centre, given that it is the only town centre close enough to be affected by the small quantum of comparison goods floorspace proposed. The assessment shows that even if 50% of the Aldi led scheme's comparison goods trade was diverted from Skelmersdale town centre (well in excess of the actual flow of non-food expenditure to this destination in Study Zone 3b – 40%) then the retail impact would be just 4.6%. This quantitative comparison goods retail impact analysis demonstrates that the proposed foodstore will only give rise to relatively modest trading impacts on Skelmersdale town centre's comparison goods sector and on defined centres in the wider surrounding area.
- 7.61 Indeed, the subsequent tables set out under Table 12 test an uplift in Skelmersdale town centre's comparison goods market share, which is the intended objective of the Ingram / Southway town centre redevelopment scheme. The tables show that if an uplift in comparison goods market share of just 3% to 10% from the study area is achieved then Aldi's consequential retail impact in 2024 would be reduced to 3.2%. Furthermore, if the

comparison goods market share increased to 15% following the introduction of the Ingram / Southway scheme then the Aldi store's impact on Skelmersdale town centre would reduce to 2.2% in 2024. Accordingly, based on our analysis, it can be conclusively demonstrated that there will be no 'significant adverse' impacts upon comparison goods trade and turnover in Skelmersdale town centre.

Convenience and Comparison Goods – Qualitative Impact

7.62 In addition to the quantitative analysis which has been undertaken, there is merit in setting out a number of qualitative factors which underline why an Aldi foodstore in this location will not result in a 'significant adverse' impact on the vitality and viability of Skelmersdale town centre. There are some key themes to outline in relation to Aldi's business model which are relevant when considering impact upon vitality and viability as a whole:

- Firstly, an Aldi discount foodstore does not represent an 'everything under one roof' shopping destination as is the case with many mainstream foodstores. The retailer will stock their 'own brand' versions of the staple food products that typically comprise a family's weekly shop alongside a very limited non-food offer. This means that mainstream foodstores and other independent convenience retailers (such as Asda and Iceland in the town centre) will still be relied upon where consumers are seeking mainstream branded goods.
- Secondly, in contrast to many larger foodstores, the proposed Aldi will not include an in-store café, post-office, pharmacy, dry-cleaners, opticians or photo processing. Nor will there be staffed butchery, fishmonger, delicatessen or greengrocery counters. Also, Aldi do not stock tobacco – a staple of many local newsagents. Given this position, a future Aldi shopper will still be wholly reliant upon existing traders in Skelmersdale, for example, for the vast majority of their specialist food retail (i.e. butcher), non-food retail, retail service, and leisure needs. The centre will therefore retain a strong customer base.
- Thirdly, in terms of Aldi's non-food retail offer, this only accounts for 20% (263qm) of the store's sales area and the range of goods stocked is seasonal and continuously rotated on a 'when it's gone it's gone' basis, with no single product range predominating. Therefore, the potential for impact is very limited; with non-food goods which may cross over with a local trader's offer on sale for only a very limited period, rather than year-round.

Health Check Overview of Skelmersdale

7.63 In considering the above qualitative impact themes, it is important to have regard to the vitality and viability of Skelmersdale town centre. We note that a relatively up-to-date health check assessment has been undertaken as part of the West Lancashire Retail and Leisure Study (2018). This Health Check assessment is quite clear that Skelmersdale has some significant current challenges as a retail destination, and we do not necessarily disagree with these findings.

7.64 For example, vacancy rates are clearly above the national average at the present time. However, we would say that in relation to the Concourse Shopping Centre in particular, a proportion of these vacancies appear to relate to the ongoing management and redevelopment of the centre. For example, the top floor has been closed and units vacated in order to make way for a forthcoming cinema conversion. This may therefore be

a factor in the current level of vacancies, with some managed and temporary in nature in order to facilitate future re-development proposals.

- 7.65 With regards the town centre's wider diversity of use, our more recent observations are consistent with those of the 2018 Retail Study, in that the dominant use is comparison goods floorspace followed by convenience floorspace and service retail uses. We actually feel that for a town centre of this role/function, Skelmersdale has a good range of national multiple comparison goods retailers. For example, the Concourse centre benefits from comparison retailers such as Boots, Wilko, Peacocks, Poundland, Card Factory, New Look, Home Bargains, Argos, Superdrug and CEX, amongst others. The centre also contains a range of convenience good retails, including Asda, Iceland, Farmfoods and Aldi. However, we have confirmed as part of this application that the limitations of Aldi's unit has led to their decision to vacate the shopping centre. Service retail uses include various hairdressers, tanning studios, nail bars and salons. In summary, whilst we acknowledge that the number of vacant units in the centre is above average, the range of retailers and services available still includes a wide variety of national multiples in the convenience, comparison and retail service sectors.
- 7.66 The main criticism of Skelmersdale in the health check undertaken as part of the 2018 Retail Study relates to its accessibility by pedestrians and overall environmental quality. We agree with this observation, in that the Concourse Centre is an inherently inward facing development which lacks permeability and is seemingly designed to be accessed primarily via car. The town centre environment is also poor and unappealing to visitors. It has perhaps suffered from the materials pallets from which it was constructed as part of the New Town movement. This seems to have been very much focussed on concrete structures, which have subsequently begun to decay.
- 7.67 In our view, poor environmental quality and weak pedestrian accessibility are the two key factors in Skelmersdale town centre's decline in recent years. Other surrounding shopping destinations have improved and are now a more pleasant and appealing alternative for residents. This is emphasised in the retail study, with it clearly showing that 80% of Skelmersdale residents (Zone 3b) travel outside Skelmersdale to undertake their comparison-goods shopping trips. In order to address this, the intention is to take the town centre in a different direction through the mixed-use Ingram / Southway town centre redevelopment scheme. This will introduce a wider mix of uses including a cinema, food and beverage, large format comparison goods units, and will take the form of a more conventional outdoor retail terrace, as oppose to the mall approach of the Concourse Centre.
- 7.68 In understanding and outlining Skelmersdale's current deficiencies, we consider that this reinforces the notion that the provision of a new Aldi store elsewhere in the town will not have a particular bearing on the vitality and viability of the centre (acknowledging that Aldi will be leaving the Concourse Centre in any case). This is because Skelmersdale as a centre evidently has a complex set of interrelated problems which are all untimely rooted in its now dated design and layout and poor pedestrian accessibility. These need to be solved at a strategic level and through radical intervention in the centre in the form of new development and perhaps also demolition, redevelopment and repurposing of some buildings.
- 7.69 The situation that Skelmersdale town centre currently finds itself in is seemingly resulting in retailers leaving the catchment altogether, purely because of its limitations as a trading location. Aldi wants to continue to serve the Skelmersdale population but needs to do so on a site which is operationally appropriate. In this context, we do not feel that the statistics surrounding Skelmersdale's current health should necessarily be a factor that

weighs against the provision of a new Aldi store at High Street – the situation is evidently far more complicated than simply it's present vacancy rate.

Impact on Vitality and Viability – Conclusions

- 7.70 On the basis of both our quantitative and qualitative analyses, we conclude that the anticipated trade diversions of the proposed Aldi foodstore will not result in a 'significant adverse' impact on any surrounding centre and as such trade and turnover will remain largely unaffected. Centres within the surrounding area currently appear to be serving an important role within the local retail hierarchy in meeting the day-to-day needs of the local resident population and this will continue irrespective of the application proposals. No conflict is therefore anticipated with this element of Policy IF1 of the West Lancashire Local Plan or paragraph 89 of the NPPF.

Impact on Investment

- 7.71 The Planning Practice Guidance explains that when assessing impact upon investment the key considerations are; the policy status of the investment (i.e. whether it is outlined in the Development Plan); the progress made towards securing the investment (i.e. if contracts are established); and, the extent to which an application is likely to undermine the planned development (i.e. its effect on operator demand and investor confidence).
- 7.72 In the case of Skelmersdale, there is realistically only one opportunity that requires assessment, this being the Ingram Rd / Northway town centre redevelopment scheme. As explained elsewhere in this Planning and Retail Statement, the Ingram Rd / Northway site has a lengthily recently planning history, involving mixed-use development proposals which will deliver a combination of both retail and leisure uses – effectively extending the town centre's offer to the west from the Concourse Shopping Centre. The scheme has gone through various iterations since the original proposals back in 2012 but has always been built around the delivery of a cinema, foodstore and accompanying mix of commercial uses.
- 7.73 In 2018, two applications were submitted in tandem which sought to fix the final details of the town centre scheme ahead of its phased construction. The applications were approved in September 2019. A Section 73 application enables retail Unit C to be split into two clearly defined units, one of which (2,062 sq.m GIA) will accommodate B&M and the other a non-food retailer of 1,091 sq.m GIA. This consent also provides for a separate terrace of flexible use retail units of 527 sq.m GIA / 369 sq.m net. The second application secured detailed permission for a discount foodstore of 2,008 sq.m GIA to specifically meet the requirements of Lidl in terms of size, format and operation, with Lidl confirmed as the end user for the unit.
- 7.74 Accordingly, it is clear that the Ingram Rd / Northway redevelopment scheme is well advanced in terms of a future investment in Skelmersdale town centre, with detailed planning permission granted for a large-scale, mixed-use scheme encompassing a wide range of commercial uses. Given the progress with this scheme, the main consideration is whether the proposed Aldi foodstore would undermine the planned development / investment based on issues such as current/forecast turnovers and operator demand.
- 7.75 With regards operator demand / future turnover, an important point to make in relation to the Ingram Rd / Northway site is that the consented Lidl will effectively be replacing the discount foodstore offer currently provided in the town centre by Aldi at the Concourse Shopping Centre – given the impending closure of this

foodstore. In this fashion, there surely remains a second discount foodstore 'market opportunity' within the catchment area for Aldi, based on the existing / committed position.

- 7.76 In considering operator demand further, it is significant that Lidl are evidently already prepared to take the Ingram Rd / Northway site despite the existence of a mainstream discount foodstore already serving Skelmersdale (Aldi, Concourse Shopping Centre), thereby introducing a second discount foodstore to Skelmersdale. We can understand this in quantitative terms, with Skelmersdale's Primary Catchment Area comprising some 55,000 people (£110m convenience goods expenditure) and therefore being easily large enough to sustain two discount foodstores. We would also add that qualitatively there is clearly scope for two discount foodstores to serve the town, given that the only other realistic offer for bulk food shopping trips is an Asda superstore. It appears that Lidl hold the same view in coming forward with a scheme in the face of Aldi already being present in the Concourse Centre.
- 7.77 The Retail Study (2018) finds that Asda trades above benchmark average levels based on the existing position in Skelmersdale (i.e. Aldi and Asda being the two largest foodstores) and this reinforces the notion that there is room for a further bulk food shopping destination such as Lidl to improve consumer choice and competition. Accordingly, it surely follows that the closure and relocation of Aldi from the Concourse Shopping Centre to the edge of Sandy Land local centre results in the same scenario as envisaged by Lidl when considering this investment opportunity (i.e. Asda and Aldi being the other main competitors in the catchment). In short, Aldi's closure and subsequent relocation cannot be seen as having any bearing on the investment opportunity that clearly already exists for a second discount foodstore to serve Skelmersdale and hence there can be no realistic conflict with the 'impact on investment' test.
- 7.78 Setting aside the discount foodstore element of the Ingram Rd / Northway redevelopment scheme, it is important to highlight that it contains a wide range of other retail, leisure and commercial uses. For example, the non-food retail element of the scheme (2,546 sq.m net) is over 1,000 sq.m (net) larger than the food retail element (1,509 sq.m). In addition, there will be a cinema of 1,446 sq.m, a public house of 615 sq.m, restaurants of 1,296 sq.m, and other flexible commercial floorspace extending to 1,237 sq.m. Accordingly, the discount foodstore represents less than 20% of the circa 10,000 sq.m of floorspace which is proposed as part of the Ingram Rd / Northway town centre re-development scheme. The Aldi will have absolutely no bearing upon investment decisions in the remaining 80% of floorspace proposed (i.e. that which does not comprise convenience goods floorspace). With the vast majority of the floorspace and uses proposed as part of the town centre redevelopment scheme clearly not affected by Aldi's presence at High Street, it seems highly unlikely that the proposal will result in a 'significant adverse' impact upon its delivery as a whole.
- 7.79 In summary, we have highlighted that in this case an important factor in the interpretation of the 'impact on investment' test is that Aldi is closing as well as opening a store in Skelmersdale – thereby resulting in no uplift in store numbers locally. It cannot therefore be said that Aldi are competing with Lidl for a single investment opportunity within the town centre, as Lidl will effectively be replacing Aldi's existing in-centre provision with a larger, more modern facility. A 'significant adverse' impact upon investment is therefore considered highly unlikely as Lidl were prepared to enter the Skelmersdale market in the face of an existing discount foodstore at the Concourse Centre and this would effectively be the scenario even if Aldi close and relocate to an alternative location close to Sandy Lane centre. Added to this is the fact that the vast majority of the floorspace and uses proposed as part of the Ingram Rd / Northway scheme (80%) are not in any way convenience goods focussed and will not be affected by Aldi's introduction at High Street. The planning

application proposal will therefore evidently not have a 'significant adverse' impact upon the deliverability of the town centre redevelopment scheme as a whole.

- 7.80 In view of this evidence, it can be concluded that the proposed Aldi foodstore would not result in a 'significant adverse' impact upon any existing, committed or planned retail investment within any surrounding centres. Therefore, no conflict with this element of Paragraph 89 of the NPPF is anticipated or indeed the relevant part of Policy IF1 ('Maintaining Vibrant Town and Local Centres') of the West Lancashire Local Plan (2012 – 2027).

Retail Impact Considerations – Overall Conclusion

- 7.81 In summary, the quantitative retail impact assessment has explained that in isolation the proposed Aldi foodstore will result in relatively limited impacts upon all centres and facilities both within Skelmersdale and the settlements beyond. Whilst impacts increase on a cumulative basis, given the introduction of the Ingram Rd / Northway town centre redevelopment scheme, this is largely offset because of the re-allocation of trade from the closure of Aldi in the Concourse Shopping Centre to Skelmersdale's existing convenience goods provision. Accordingly, it cannot be suggested that these in-centre shops will suffer a 'significant adverse' quantitative impact, as their turnovers will remain broadly in-line with or above the present-day position. This is not a surprising statistical outcome, as there will be no net gain in discount foodstores in Skelmersdale as a consequence of this application, over and above the position already established by existing provision and committed developments (i.e. Lidl).
- 7.82 Turning to qualitative impacts, a variety of factors have been outlined which emphasise why an Aldi foodstore of the scale proposed would be unlikely to impact adversely upon the vitality and viability of a centre such as Skelmersdale. This is largely as it is not an 'everything under one roof' shopping destination such as some food superstores. It will not include staffed counters (i.e. butchery) or concessions, will provide only a small amount of comparison goods floorspace, and will generally offer only own-branded goods. The qualitative impact assessment has provided a health check summary of Skelmersdale and whilst this acknowledges current deficiencies, we do not believe a replacement Aldi foodstore elsewhere in the town will have a particular bearing on the centre's vitality and viability. This is because it evidently suffers from a complex set of interrelated structural problems which are rooted in its now dated design and layout and poor accessibility. These clearly need to be solved at a strategic level and through radical intervention (demolition, redevelopment, etc.). The centre's vacancy rate is a product of these structural problems and should not weigh against the provision of a re-located Aldi store at High Street and the investment that it will bring to Sandy Lane local centre.
- 7.83 Finally, with regards impact upon investment, the main issue is the scheme's effect on the Ingram Rd / Northway town centre redevelopment scheme. However, with Aldi closing and opening a store there will be no uplift in store numbers in Skelmersdale. It cannot therefore be said that Aldi are competing with Lidl for a single investment opportunity within the town centre, as Lidl will effectively be replacing Aldi's existing in-centre provision with a larger, more modern facility. Finding a 'significant adverse' impact upon investment is illogical as Lidl were already prepared to enter the Skelmersdale market in the face of an existing discount foodstore at the Concourse Centre. This would effectively still be the scenario if Aldi close and relocate to an alternative location close to Sandy Lane centre.

- 7.84 Added to this is the fact that the vast majority of the floorspace and uses proposed as part of the Ingram Rd / Northway scheme (80%) are not in any way convenience goods focussed and will not be affected by Aldi's introduction at High Street. The planning application proposal will therefore evidently not have a 'significant adverse' impact upon the deliverability of the town centre re-development scheme as a whole.
- 7.85 In view of the impact analysis set out within this section of the report, no conflict with Paragraph 89 of the NPPF is anticipated and the scheme is considered to accord with the local retail impact test set out Policy IF1 of the West Lancashire Local Plan (2012 – 2027).

8. Planning Assessment

- 8.1 The purpose of this Section is to assess the application proposals in the context of planning policy and guidance. This Section omits analysis of retail matters which is outlined in detail in sections 6 and 7 of this Statement.
- 8.2 This Section focuses on policies focusing on the built environment and design, environmental protection and sustainability, transport and accessibility. This Statement sets out that the NPPF places an emphasis on the facilitation of economic growth and securing sustainable development.
- 8.3 The NPPF confirms that the Government is committed to ensuring the planning system supports sustainable economic growth. Paragraph 80 of the NPPF states that 'significant weight' should be placed on the need to support economic growth and productivity through the planning system. The contribution which the proposals will make to the local and wider economy should therefore be accorded substantial weight in the determination process.
- 8.4 The following section assesses provides a summary of the supporting reports and sets out how the proposed development accords with the Development Plan.

Principle

Loss of Employment

- 8.5 The Site is brownfield in nature and accommodates a former office building which has not been in active use since the Co-op relocated within the Borough. The Site is located at the edge of the employment area, with a number of residential properties in close proximity to the boundary.
- 8.6 Local guidance for the loss of the existing premises is set out within Policy GN4. Which states:

"Where an application relies upon a marketing exercise to demonstrate that there is no demand for the land/premises in its current use, the Applicant will be expected to submit evidence to demonstrate that the marketing was adequate and that no reasonable offers were refused. This will include evidence demonstrating that:

- i) The marketing has been undertaken by an appropriate agent or surveyor at a price which reflects the current market or rental value of the premises for its current use and that no reasonable offer has been refused;*
- ii) The premises have been marketed for an appropriate period of time, which will usually be 12 months;*
- iii) The premises have been regularly advertised and targeted at the appropriate audience. Consideration will be given to the nature and frequency of advertisements in the local press, regional press, property press, or specialist trade papers etc; whether the premises have been continuously included on the agent's website and agent's own papers/lists; the location of advertisement boards; whether there have been any mail shots or contact with local property agents, specialist commercial agents and local businesses; and with regards to commercial/industrial property, whether it has been recorded on the Council's sites and premises search facility"*

- 8.7 This application is supported by marketing evidence provided by Mason Owen, which sets out that a comprehensive and extensive marketing exercise has been undertaken, but that since August 2016 the agent has been unsuccessful in finding a suitable occupier/purchaser until Aldi's expression of interest.
- 8.8 This is unsurprising as the site currently accommodates a two-storey 1960's pre-fabricated office building (Pennylands House) which was originally constructed to house the Skelmersdale Development Corporation during the planning and construction of Skelmersdale new town during the 1960's and 70's. Following this, the offices were occupied by the Co-operative Group for many years until they vacated Pennylands in 2016. The building is clearly coming to the end of its intended lifespan and now offers a poor impression of the area, it seems highly unlikely that it would be occupied again by office tenants – with there being better opportunities locally and further-a-field.
- 8.9 Mason Owen confirm that whilst there have been some enquiries since the property was first marketed, the parties involved discounted the opportunity on receipt of details of price, location, size, specification and ground conditions. Two offers to purchase the site for residential uses were received (i.e. another non-employment use), however neither progressed beyond an early stage. Accordingly, it can be categorically demonstrated through the marketing exercise undertaken that there is no demand for Pennylands House in its current form / use, and the site's redevelopment for an alternative use would not therefore conflict with Policy GN4 of the Local Plan.

Proposed Retail Use

- 8.10 The proposed development seeks the erection of a Class A1 foodstore on a site which is located in a well-connected edge-of-centre location. The foodstore will be a replacement facility for the Aldi's existing store at the Concourse Shopping Centre, which no longer meets the Applicant's requirements and will close irrespective of this planning application. The Applicant is seeking to erect a foodstore to improve both the quantitative and qualitative convenience goods offer in the west of Skelmersdale and to better meet customer demand in the Skelmersdale catchment.
- 8.11 The Site is highly visible from the wider area and has a strong relationship to the nearby local centre. It therefore provides the opportunity to allow the Applicant to deliver growth on a well-located site. Details of access is provided further below.

Access

- 8.12 This planning application is supported by a Transport Assessment and Framework Travel Plan, prepared by Cameron Rose Associates. The Transport Assessment sets out the trip generation, assignment and distribution and the impact of the proposals on the operational performance of the highways network.
- 8.13 In terms of access, the Site is within walking distance of public transport connections. The closest bus stops to the proposed development are located on the Site's northern boundary (High Street). Bus services connect the Site to Wigan, Skelmersdale, Blaguegate, Southport and Liverpool.
- 8.14 The Site also benefits from high quality pedestrian infrastructure and will support cycling by the provision of spaces close to the foodstores entrance. 20 cycle spaces (10 Sheffield cycle hoops) are proposed to be located within the car park.

- 8.15 In total, 151 car parking bays are proposed, with 9 disabled bays, 12 parent and child spaces and 7 motorcycle spaces. The quantum of spaces is within local parking standards. The layout of the car park prioritises the need of disabled and parent and child users, locating bays closer to the foodstores' entrance.
- 8.16 As the proposed development is accessible by a range of public and private transport, manages car use and does not have any significant adverse impacts on the highways network it is considered that the development accords with NPPF Paragraph 109 and Policy IF2 of the Local Plan.

Environment

Arboriculture

- 8.17 This application is supported by an Arboricultural Assessment, prepared by Bowland Tree Consultancy which provides details of existing trees. The application is also supported by landscaping details prepared by Vector.
- 8.18 The Arboricultural Constraints Appraisal identifies that there are a number of tree groups on the Site, with a number of trees located along the Site's boundaries. A particularly prominent pocket is positioned towards the junction of High Street and Westgate.
- 8.19 The Arboricultural Assessment finds that the quality of the existing trees varies across the Site, with a number of poor quality trees and groups located throughout the Site. Towards the Site's eastern and north-western boundary's there are a number of trees which are of moderate quality.
- 8.20 The Landscaping Plan illustrates that large areas with trees of moderate quality will be retained, maintained and enhanced. Some groups of moderate quality within the car park will be removed. To compensate for the loss of trees, a comprehensive landscaping scheme is proposed to maintain visual amenity.
- 8.21 As the proposed development seeks to mitigate the loss of trees, retains the majority of trees, and proposes additional landscaping throughout the Site, it is considered to comply with Local Plan Policies EN2 and GN3, which aim to minimise tree loss and ensure mitigation is provided for the loss of arboriculture.

Biodiversity and Ecology

- 8.22 An Ecological Appraisal of the site was undertaken by Bowland Ecology in May 2019. This found that there are no statutory or non-statutory designated wildlife sites within 1km of the application site. Whilst the site does fall within the Ravenhead Brickworks Site of Special Scientific Interest (SSSI) Impact Risk Zone, the Ecological Appraisal outlines that the proposed works on site do not fall into any of the categories that require consultation with Natural England.
- 8.23 In terms of site habitats, the appraisal comments that the majority of the site is dominated by hardstanding and buildings, with small areas of unmanaged amenity grassland also present, alongside several scattered mature and semi-mature trees.
- 8.24 In terms of the species present on the site, no evidence of roosting bats was observed during the external building inspection survey. However, the building was noted to have features that could be used by bats as summer day roosts. Accordingly, a dusk emergence survey was undertaken in the summer of 2019, but this

found that no bats emerged from the building. The likelihood of bats using the building as roosting habitat is considered by the report to be of 'negligible risk'.

- 8.25 With regards birds, the report states that where scattered trees and introduced shrubs are removed/affected, impacts to nesting birds could occur if works are undertaken within the nesting bird season. Finally, for mammals, the report states that clearance of introduced shrubs and scattered trees has the potential to impact small mammals including hedgehog, which are potentially hibernating/sheltering in the aforementioned habitats on site.
- 8.26 In terms of the report's recommendations, for bats it states that a precautionary approach to demolition and tree removal is recommended. Contractors should be made aware of procedures should bats be encountered and guidelines are outlined at Para 5.7 of the Ecological Appraisal. The report also recommends that lighting schemes for the development should be designed in accordance with the appropriate guidance (ILP, 2018) to minimise the impacts on foraging bats. The report also suggests that bat boxes should be installed as part of the future scheme.
- 8.27 With regards birds, the report recommends that nesting bird habitat on site is retained where possible and that where this is not possible mitigation for the loss of breeding bird habitat should include the planting of native species. It also requires the provision of six open fronted nest boxes on mature trees around the site and for tree and shrub clearance to be undertaken outside of the nesting period.
- 8.28 Finally, in terms of small mammals, the report states that contractors should be made aware of their likely potential presence when clearing shrubbery. Any small mammals found during construction should be carefully relocated to a sheltered location with plenty of vegetation cover. The report also seeks the provision of artificial or natural hedgehog boxes located in the north eastern corner of the site and the creation of 'hedgehog highways' by leaving holes in boundary fencing to allow the movement throughout the site.
- 8.29 In conclusion, it is clear that overall the site has a low ecological significance. However, notwithstanding this a range of mitigation measures have been proposed by the submitted Ecological Appraisal which will actively enhance it in the future for wildlife – Including bats, birds and small mammals. Accordingly, there is no potential for conflict with the relevant local planning policies which seek to protect the environment, or those policies of relevance contained within the NPPF.

Flood Risk and Drainage

- 8.30 This application is supported by a Flood Risk and Surface Water Drainage Assessment, prepared by Integra Consulting. The assessment has been undertaken in accordance with national and local guidance and consultation has taken place with the Environment Agency and LLFA.
- 8.31 The Site lies wholly within Flood Zone 1 and extends to c.1.24ha.
- 8.32 The proposed development seeks no changes to the existing arrangement and discharge water into the existing sewer system. However, the proposed development will seek a 50% reduction in existing flows to cater for a 1 in 30 year event plus a climate change event.

8.33 As the proposed development will reduce flow rates and not lead to any adverse impacts it is considered compliant with the NPPF and Local Plan Policy GN3.

Noise Impact

8.34 This application is supported by a Noise Impact Assessment ('NIA'), prepared by BWB Consulting. The report sets out that BWB have engaged in pre-application discussions with West Lancashire Borough Council in order to scope the assessment.

8.35 The survey is undertaken in accordance with BS 4142 and considers noise from multiple sources, including servicing, plant and noise from traffic associated with the development. The NIA identifies four noise sensitive receptors and finds that the proposed foodstore is unlikely to give rise to an adverse noise impact.

8.36 As the proposed development will not have an adverse impact on the amenity of neighbouring properties the development is considered compliant with NPPF paragraphs 170 and 180 and Local Plan Policy GN3.

Design

8.37 The proposed development has considered the surrounding context and the final design reflects the main design principles for the development. These include:

- To visually enhance the approach along both High Street and Westgate by developing this prominent site in an appropriate way;
- To create a safe and convenient customer car park accessed from the entrance position along Higher Lane, whilst maintaining a safe pedestrian footpath;
- Improved pedestrian access into the site from High Street, and a clear pedestrian route through the site from Westgate; and,
- To update and enhance the site's visual amenity creating a modern, sympathetic and exciting addition to the local area.

8.38 With regards to use, the proposed development is for a Class A1 foodstore with a 1,315sq.m sales area and an additional divisible Class A1/A2/A3 unit of 372sq.m. The function of the foodstore necessitates dedicated car parking, servicing and ancillary landscaping and access.

8.39 The proposed layout considers the shape and size of the Site and its features, including the location of existing soft landscaping, trees and access. The layout of the Site has been designed to create a strong frontage through the Site. Running perpendicular to the High Street, the frontage will direct people into the Site from the main pedestrian access on High Street, whilst facilitating access from the adjacent employment area and maximising visibility across the car park.

8.40 For servicing, the proposals will create a separate servicing access to allow for efficient and practical servicing of the Aldi foodstore and use of the car park. The smaller retail unit will be serviced from the car park as the needs for servicing the unit will cause minimal disruption to the customer car park.

- 8.41 The surrounding architecture is predominantly residential constructed of red brickwork as the primary material. The brickwork is supplemented with white render and a mixture of timber/shingle/PVC plank cladding. The design considers the surround vernacular and employs a simple palette of materials and crisp contemporary style. The primary material within the development is red brickwork, which will be supplemented with a combination of white render and grey cladding.

Environment and Sustainability

- 8.42 The Design and Access Statement provides an overview of Aldi's approach to the environment and sustainability. The Statement sets out that the development will seek to minimise energy use, minimise waste and use sustainable building materials.

Landscaping

- 8.43 A considered landscaping scheme composed of ornamental trees and native species will be added to the site to soften the appearance of the car park. The hard and soft landscape within the development boundary will be enhanced by a pedestrian route and new shrubbery. This proposed ornamental shrub planting will provide interest to the site and provide ALDI with a low maintenance landscape proposal.
- 8.44 It was important within the scheme to maintain and enhance the existing landscaping which is prominent around the site. Two areas of existing, mature trees and landscaping are to be retained as part of the proposal and the substantial low level landscaping which forms the boundary condition to Westgate will be retained and enhanced.

Security

- 8.45 The proposed design has been designed with safety and crime prevention in mind. A number of physical security measures are proposed to reduce the opportunity for and perception of crime. This includes:
- Good natural surveillance across the car park
 - Cycle parking located in a location with good visibility;
 - Well-maintained planting and vegetation; and,
 - CCTV and alarm systems.
- 8.46 As the development will comply with the requirements for access and parking and will be in-keeping with the character and appearance of the area the development is considered to be compliant with Local Plan Policy GN3.

Summary

- 8.47 This section has clearly demonstrated that the proposals meet the requirements of the policies contained within the West Lancashire Local Plan (2012 – 2017) relating to employment land, arboriculture, noise, design, transportation, flood risk, ecology, and landscaping; as well as the relevant, corresponding policies contained within the NPPF. The above analysis, when considered alongside separate justifications for the sequential test and retail impact assessment, demonstrate the development is acceptable in planning policy terms.

9. Conclusion

Overview

- 9.1 This Planning and Retail Statement has been prepared on behalf of Aldi Stores Ltd in support of a detailed application which seeks planning permission for the erection of a Class A1 foodstore and a divisible, flexible-use Class A1-A3 retail unit together with associated vehicular accesses, car parking, servicing area, and hard and soft landscaping on land at Westgate and High Street in Skelmersdale.
- 9.2 The site's potential for redevelopment is self-evident. It is situated in a prominent location at the corner of High Street and Westgate in western Skelmersdale. At present it is occupied by a 1960's pre-fabricated office building that was vacated by the Co-operative Group in 2016 and has since fallen into disrepair after efforts to find an alternative office occupier failed. Today the site has become a target for vandalism, break-ins and anti-social behaviour. It offers a generally poor impression of the area, with its windows boarded up and the site hoarded off from the public.
- 9.3 The significant investment proposed by Aldi will provide the opportunity to radically improve the appearance and profile of this prominent site. The scheme will also create 40-50 full and part-time jobs, whilst enhancing consumer choice and competition within western Skelmersdale – where there currently is no 'main' food shopping destination. Furthermore, the Aldi store will help 'claw-back' convenience goods expenditure which is currently leaking from Skelmersdale to more distant centres and facilities – including existing Aldi stores in Ormskirk and Burscough.
- 9.4 The rationale for Aldi submitting this planning application is that the retailer has made the decision to vacate their existing store within the Concourse Centre in Skelmersdale town centre. Aldi has simply outgrown these premises, which offer only two thirds of the amount of sales floorspace that their modern format stores require (1,315 sq.m net). Given its mall location, the Concourse Centre unit also cannot offer the adjacent, dedicated surface level car parking which modern 'bulk' food shoppers have come to expect of foodstores and which Aldi's competitors elsewhere in Skelmersdale are able to provide. This factor has significantly impacted upon sales at the store, as has the constraint that the mall closes at 5:30pm or earlier on most days of the week. Accordingly, Aldi's objective is to bring their latest discount foodstore format to Skelmersdale so that it can better meet the community's food shopping needs.
- 9.5 It is important to highlight that the location Aldi has selected for its replacement Skelmersdale foodstore is less than 200m from Sandy Lane local centre, with which it benefits from straightforward and safe pedestrian linkages. The application site therefore represents a well-connected edge-of-centre location. Sandy Lane is a relatively large local centre and community hub built as part of Skelmersdale's new town designation in the 1960/70's. It contains a range of small units but no 'main' food shopping destination. The provision of a well-connected, edge-of-centre foodstore such as Aldi will significantly boost footfall in the locality, generating spin-off trade for existing Sandy Lane businesses and potentially also attracting new investment in the centre.

Policy Compliance

- 9.6 This Planning and Retail Statement has considered the development proposals against relevant policies contained within the Development Plan (West Lancashire Local Plan) for the area as well as other material considerations including national planning policy guidance. Specific consideration has been given to the retail impact and sequential tests of the NPPF. In addition, the Statement has also sought to demonstrate that the proposed discount foodstore will give rise to a number of retail benefits which weigh in favour of the scheme being granted planning permission.

Sequential Approach

- 9.7 The sequential test is dealt with at section six of this report, where five sites have been examined (see also the site-specific pro-formas at Appendix III). Of particular note is the Ingram Rd / Northway town centre redevelopment proposals in Skelmersdale. This site has been examined in detail and it has been explained that given the detailed nature of the September 2019 planning permission – which tailors specific units to the size and format of specific end users – none are suitable for Aldi's required net sales area and business model.
- 9.8 With regards the site's availability, press releases from the developer (St Modwen) are clear that Lidl will occupy the scheme's discount foodstore. The opportunity is not therefore 'on the market' for acquisition by Aldi or indeed any other retailer. Further, as soon as construction of the Lidl foodstore commences (seemingly in the coming months) the sequential test becomes irrelevant, as there simply is no longer a comparable market opportunity within the town centre to discuss. The weight to be attached to the Ingram Rd / Northway site at this point in time as a sequential alternative is therefore highly questionable.
- 9.9 Our sequential assessment has also confirmed that all other opportunities in both Skelmersdale town centre and Up Holland local centre are neither 'suitable' and 'available'. Accordingly, it can be confirmed that the proposed development accords with the sequential test and compliance can therefore be demonstrated with Paragraph 86 of the NPPF and Policy GN5 of the West Lancashire Local Plan.

Impact on Vitality and Viability

- 9.10 The quantitative retail impact assessment set out at section seven of this report has explained that in isolation the proposed Aldi foodstore will result in relatively limited impacts upon all centres and facilities both within Skelmersdale and the wider catchment. Whilst impacts increase on a cumulative basis, given the introduction of the Ingram Rd / Northway town centre scheme, these are largely offset because of the re-allocation of trade from the closure of Aldi in the Concourse Centre to Skelmersdale's existing convenience goods provision. Accordingly, it cannot be suggested that these in-centre shops will suffer a 'significant adverse' impact on their trade, as their turnovers will remain broadly in-line with (or above) the present-day position. This is not a surprising statistical outcome, as there will be no net gain in discount foodstores in Skelmersdale as a consequence of this application.
- 9.11 Turning to qualitative impacts, a variety of factors have been outlined which emphasise why an Aldi foodstore of the scale proposed would be unlikely to impact adversely upon the vitality and viability of a centre such as Skelmersdale. This is largely as it is not an 'everything under one roof' shopping destination, such as some food

superstores. It will not include staffed counters (i.e. butchery) or concessions, will provide only as small amount of comparison goods floorspace, and will generally offer only own-branded goods.

- 9.12 The qualitative impact assessment has provided a health check summary of Skelmersdale and whilst this acknowledges current deficiencies, we do not believe a replacement Aldi foodstore elsewhere in the town will have a particular bearing on the centre's long-term vitality and viability. This is because it evidently suffers from a complex set of interrelated structural problems which are rooted in its now dated design and layout and poor accessibility. These clearly need to be solved at a strategic level and through radical intervention (demolition, re-development, re-purposing, etc.). The centre's vacancy rate is a product of these structural problems and should not weigh against the provision of a re-located Aldi foodstore at High Street and the investment that it will bring to Sandy Lane local centre.

Impact on Investment

- 9.13 Finally, with regards impact upon investment, the main issue is the scheme's effect on the Ingram Rd / Northway town centre redevelopment scheme. However, with Aldi closing and opening a store there will be no uplift in store numbers in Skelmersdale. It cannot therefore be said that Aldi are competing with Lidl for a single investment opportunity within the town centre, as Lidl will effectively be replacing Aldi's existing in-centre provision with a larger, more modern facility. Concluding that there will be a 'significant adverse' impact upon investment is illogical, as Lidl were already prepared to enter the Skelmersdale market in the face of an existing Aldi discount foodstore at the Concourse Centre. This would effectively still be the scenario if Aldi close at the Concourse and relocate to an alternative location close to Sandy Lane centre.
- 9.14 Added to this is the fact that the vast majority of the floorspace and uses proposed as part of the Ingram Rd / Northway scheme (80%) are not in any way convenience goods focussed and will not be affected by Aldi's introduction at High Street. The planning application proposal will therefore evidently not have a 'significant adverse' impact upon the deliverability of the town centre re-development scheme as a whole.

Overall Conclusions – Retail Impact

- 9.15 In view of the retail impact analysis set out within section seven of our report, no conflict with Paragraph 89 of the NPPF is anticipated and the scheme is considered to fully accord with the local retail impact test set out Policy IF1 of the West Lancashire Local Plan (2012 – 2027).

Other Planning Policy Matters

- 9.16 Section eight of this report has demonstrated that the planning application proposals meet the requirements of the relevant local planning policies contained within the West Lancashire Local Plan (2012 – 2027) relating to employment land, arboriculture, noise, design, transportation, flood risk, ecology, and landscaping. In respect of employment land in particular, this application is supported by marketing evidence provided by Mason Owen, which confirms that a comprehensive and extensive marketing exercise has been undertaken, but that since August 2016 the agent has been unsuccessful in finding a suitable employment land compatible occupier/purchaser for Pennylands. This marketing exercise far exceeds the requirements of Policy GN4 of the Local Plan and accordingly there is evidently no conflict with this local employment land policy test.

Overview, Benefits and Planning Balance

- 9.17 The NPPF is clear that development proposals which accord with an up-to-date development plan should be approved 'without delay'. This Planning and Retail Statement has demonstrated that the application proposals are compliant with the adopted West Lancashire Local Plan and permission should therefore be granted. Notwithstanding this favourable position, the NPPF also confirms that planning applications should be granted permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (NPPF Paragraph 11).
- 9.18 Our report has identified a number of very positive impacts that the proposed redevelopment of Pennylands to provide a modern discount foodstore will give rise to (reflective of NPPF, Paragraph 8). It is appropriate to weigh these material considerations in the planning balance as part of the determination of the application. The positive impacts can be summarised as follows:
- The Aldi foodstore will enhance consumer choice in Skelmersdale's convenience goods retail sector, by providing the first 'bulk' food shopping destination in western Skelmersdale. It will also increase competition to the benefit of consumers, with the town's Asda superstore not just the dominant foodstore in Skelmersdale but also in West Lancashire as a whole (source: West Lancashire Retail Study 2018);
 - The site is located on the edge of Sandy Lane local centre (just 175m), with which it benefits from straightforward and safe pedestrian linkages. The provision of a well-connected, edge-of-centre foodstore (providing free parking) such as Aldi will significantly boost footfall in the locality, generating spin-off trade for existing Sandy Lane businesses and potentially also attracting new investment in the centre;
 - The foodstore will 'claw back' some £3m of Skelmersdale's convenience goods expenditure which is currently leaking to facilities outside the settlement (i.e. beyond Zone 3b). With regards the Primary Catchment Area as a whole (Study Zones 3a and 3b), it is anticipated that the scheme will claw back in the order of £4.9m of convenience goods expenditure;
 - Aldi will create 30-50 quality full and part-time jobs; delivering further indirect jobs through services supporting the new facility, and also providing a range of temporary construction jobs. The vast majority of positions will be made available to local people via targeted work with organisations such as Job Centre Plus;
 - The significant investment proposed by Aldi will provide the opportunity to radically improve the visual appearance and profile of a prominent site which currently suffers from a poor-quality environment and has become a target for vandalism, break-ins and anti-social behaviour;
 - The proposal offers the guarantee of deliverable economic development within western Skelmersdale by a national brand (Aldi) which will help boost the local economy and will assist in attracting further investment; and,
 - The introduction of Aldi will reduce health inequality on the western side of Skelmersdale in particular, by providing straightforward access to a wide range of fresh produce and healthy food at heavily discounted prices.
- 9.19 Overall, it has been demonstrated that the proposed foodstore scheme accords with the key policies of the West Lancashire Local Plan, as well as the relevant policy tests contained within the NPPF. Furthermore, we have highlighted that the application proposals will deliver some very significant positive benefits which weigh

heavily in favour of the scheme and are not '*significantly and demonstrably outweighed*' by adverse impacts. The application proposals are therefore acceptable in planning terms and it is respectfully requested that planning permission is granted.

Appendix I

Supporting Documents

Reports

- Planning and Retail Statement prepared by Avison Young;
- Arboricultural Assessment prepared by Bowland Tree Consultancy;
- Coal Mining Risk Assessment prepared by Brownfield Solutions Ltd;
- Design and Access Statement prepared by The Harris Partnership;
- Ecological Appraisal prepared by Bowland Ecology;
- Flood Risk and Drainage Assessment prepared by Integra;
- Geo-Environmental Assessment Report prepared by Brownfield Solutions Ltd;
- Noise Impact Assessment prepared by BWB Consulting;
- Marketing Evidence prepared by Mason Owen;
- Phase 1 Site Investigation prepared by Brownfield Solutions Ltd; and,
- Transport Assessment and Framework Travel Plan prepared by Cameron Rose Associates.

Plans

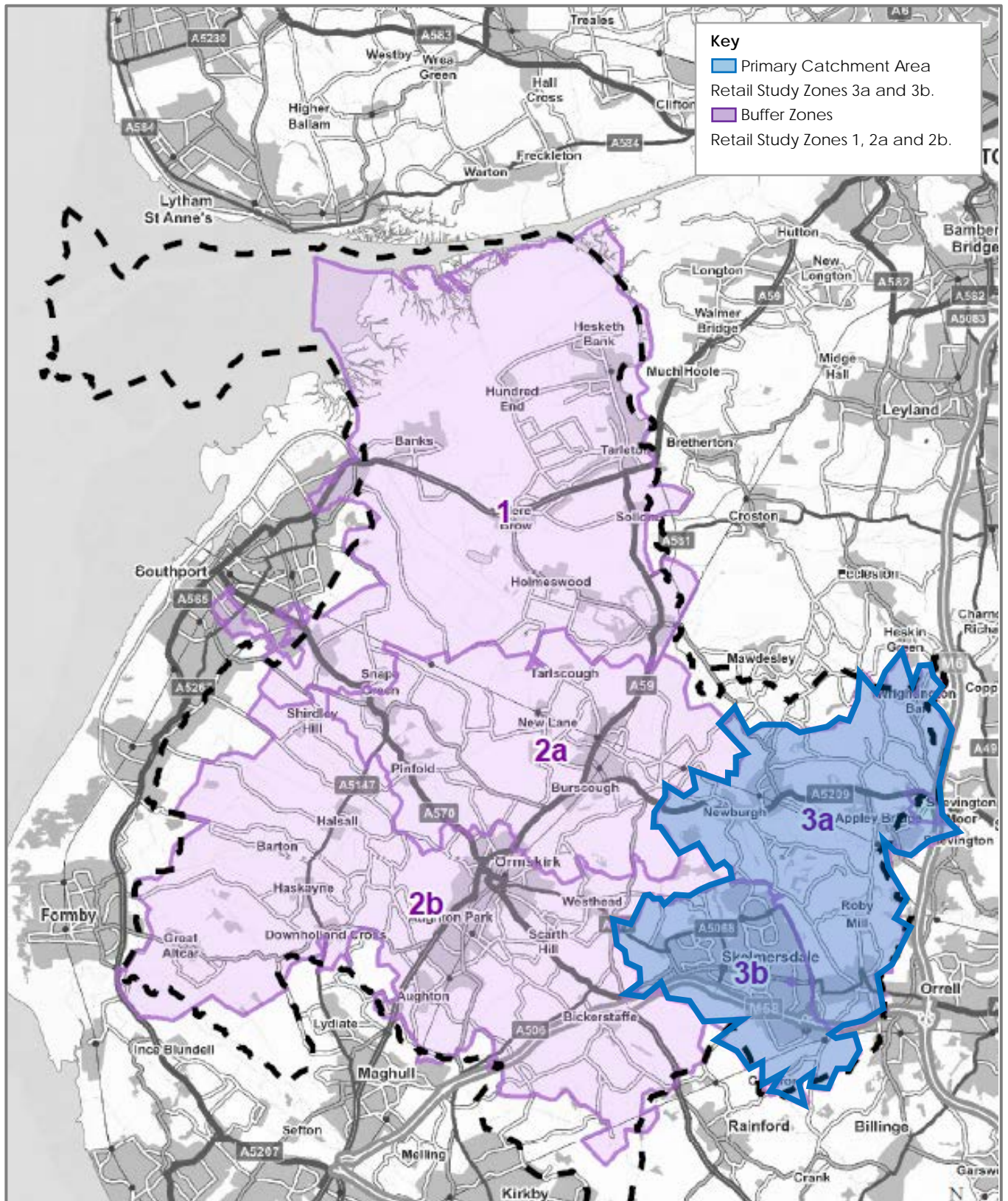
- 2268BOL-110 - Site Location Plan;
- 2268BOL-111 - Existing Site Plan;
- 2268BOL-112C - Proposed Site Plan;
- 2268BOL-113 - Proposed GA Plan;
- 2268BOL-144A - Proposed Elevations;
- 2268BOL-117C - Proposed Boundary Treatment;
- 2268BOL-115 - Proposed Roof Plan;
- 2268BOL-116 – Demolition Plan
- 2269COL-CGI 01A – CGI; and,
- V2269 L01A – Landscape Plan.

Appendix II

Catchment Area Plan

Appendix II:

Plan Illustrating Primary Catchment Area of Proposed Aldi Foodstore and Wider Buffer Zones


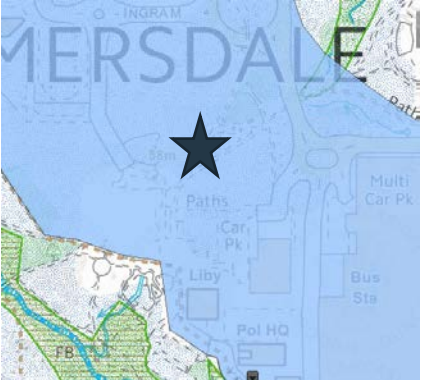




Base map represents an extract from the West Lancashire Retail and Leisure Study (2018)

Appendix III

Sequential Assessment Pro-Formas

1. Skelmersdale Town Centre Redevelopment Proposal, Ingram Rd / Northway, Skelmersdale

<p>Site Image</p>	
<p>Site Area</p>	<p>The site extends to approximately 5.5ha.</p>
<p>Existing & Neighbouring Uses</p>	<p>The site is located within Skelmersdale Town Centre on land to the east of Northway and south of Ingram Road including the area around the existing Nye Bevan Swimming Pool and Skelmersdale Library. It is predominantly grassland with low density shrubbery and tree coverage and includes a cleared site, formerly the West Lancashire College building. The site also incorporates part of the existing town centre square to the west of the Concourse Shopping Centre and north of the Police Station</p>
<p>Sequential Position</p>	<p>For the purposes of the application of the sequential test the site is considered to represent an in-centre location based on the town centre’s policy allocation. However, it is important to note that the adopted local plan does not define a Primary Shopping Area (PSA) for the centre (as would typically be expected) and instead classifies existing retail space (such as the Concourse Shopping Centre) and vacant land (such as Ingram Rd / Northway) all as simply ‘town centre’. If the PSA were to be defined then it is unlikely that this site would fall within it as it presently does not contain any retail floorspace.</p>
<p>Policy Position</p>	<p>An extract of the Proposals Map is provided below.</p>  <p>Key</p> <ul style="list-style-type: none">  Town Centre  Ingram Rd / Northway Site <p>The Site is located within Skelmersdale Town Centre. Policy IF1 explains that Class A1 retail will be encouraged within town and local centres. Meanwhile, Policy SP2 of the Local Plan identifies Skelmersdale town centre as a strategic development site, where new retail, leisure and recreational opportunities will be encouraged.</p>

1. Skelmersdale Town Centre Redevelopment Proposal, Ingram Rd / Northway, Skelmersdale

<p>Planning Applications</p>	<p>2012/0866/OUT – Outline planning application with details of access for a mixed-use development including a foodstore, cinema, restaurants, mixed commercial uses (to include small scale retail uses, financial services and food and drink uses (Use Classes A1/A2/A4/A5), petrol filling station, car park and youth zone along with new public realm, children's play area and associated landscaping, earthworks, infrastructure, access, ancillary works and utilities. Application Approved.</p> <p>2014/1189/FUL – Erection of a mixed-use development including a foodstore, A1 retail units, D2 cinema, A3 restaurants, A4 public house, mixed commercial uses (to include small scale retail uses, financial services and food and drink uses (Use Classes A1/A2/A3/A5), car parking along with new public realm, children's play area and associated landscaping, earthworks, infrastructure, access, ancillary works and utilities. Application approved (note. Application subject to judicial review)</p> <p>2018/0328/CON – Approval of details reserved by Condition No's. 3, 4, 9, 13, 15, 16, 18, 19, 22, 24, 25, 26, 27, 28, 31, 34, 37 and 39 of planning permission reference 2014/1189/FUL relating to levels, materials, contaminated land, lighting, construction method statement, site access and off-site works, car park management strategy, internal road network, drainage, oil and petrol, separators, coal mining investigation, landscaping, habitat management plan, arboricultural method statement, re-positioned rock feature, upgrade of pedestrian and cycle routes, cut and fill and car park phasing. Approved.</p> <p>2018/0395/FUL – Variation of Condition No's. 9 and 25 of planning permission 2014/1189/FUL relating to a phased contaminated land investigation and coal mining investigation works. Application approved.</p> <p>2018/0897/FUL – Variation of Condition No's. 2, 6, 8, 13, 19, 26, 30 and 34 of planning permission 2018/0395/FUL to vary approved plans, the total gross internal floorspace devoted to Class A uses, the occupation of Blocks C and D, external lighting scheme, internal network, landscaping and landscaping maintenance, subdivision of units, pedestrian and cycle routes within the site. Approved – 10 September 2019.</p> <p>2018/0898/FUL – Erection of retail foodstore (Lidl) and associated works. Approved – 21 September 2019.</p>
<p>Ownership Position</p>	<p>The site is understood to be in the ownership of St Modwen developments, who are bringing forward (as applicants) the town centre redevelopment scheme.</p>
<p>Suitability</p>	<p>The Ingram Rd / Northway site in Skelmersdale town centre has a lengthily recently planning history, involving mixed-use development proposals which will deliver a combination of both retail and leisure uses – effectively extending the town centre's offer to the west from the Concourse Shopping Centre. The scheme has gone through various iterations since the original proposals back in 2012 but has always been built around the delivery of a cinema, foodstore and accompanying mix of commercial uses.</p> <p>In 2018, two applications were submitted in tandem which sought to fix the final details of the scheme ahead of its phased construction. Firstly, an application was made under Section 73 to vary the approved plans pursuant to the site's detailed planning permission (Ref. 2018/0897/FUL). Amongst other things, this application enables retail Unit C of the scheme to be split into two clearly defined units, one (Unit C1) would be 2,062 sq.m GIA / 1,658 sq.m net and the other (Unit C2) would be 1,091 sq.m GIA / 764 sq.m net. The Planning and Retail Statement which supports the Section 73 application (Ref. 2018/0897/FUL) is</p>

1. Skelmersdale Town Centre Redevelopment Proposal, Ingram Rd / Northway, Skelmersdale

clear that Unit C1 has been tailored specifically for the requirements of B&M Bargains who will occupy it in due course. The application states that the remaining retail unit of 1,091 sq.m (Unit C2) will be occupied by a non-food retailer (and has been assessed as such in the applicant's retail impact assessment). Whilst it does not make any changes to them, for completeness we would highlight that the Section 73 application also still involves the introduction of 527 sq.m GIA / 369 sq.m net of smaller scale 'flexible use' retail units as part of the scheme. This is in addition to a proposed six-screen cinema, new restaurants (to complement the cinema), a family pub, and new areas of public realm.

The second application that was made in 2018 was a detailed planning application for a Lidl foodstore of 2,008 sq.m GIA / 1,265 sq.m net (Ref. 2018/0898/FUL). The supporting Planning and Retail Statement is clear that this application has been made to ensure that the foodstore specifically meets the requirements of Lidl in terms of size, format and operation, with Lidl confirmed as the end user for the unit.

It is noted that both of these planning applications were approved in September 2019, meaning that the majority (4,070 sq.m GIA / 71%) of the retail floorspace proposed as part of the town centre redevelopment scheme has been tailored specifically to the needs of two anchor tenants (Lidl and B&M). St Modwen has also previously announced (June 2018) that these retailers have exchanged contracts to take space in the scheme. This leaves only 1,618 sq.m of retail floorspace within the Ingram Rd / Northway scheme which takes the form of a non-food retail unit of 1,091 sq.m GIA / 764 sq.m net (Unit C2), alongside a separate terrace of flexible use retail units of 527 sq.m GIA / 369 sq.m net.

In examining the approved scheme's 'suitability' to accommodate the scale and form of retail development proposed, it is important to highlight that the proposed Aldi foodstore would have a Gross Internal Area of 1,786 sq.m and a net sales area of 1,315 sq.m. This net sales area in particular is a minimum requirement for the retailer as part of all new stores because it is this that their store format (and by extension their business model) is based upon. Indeed, Aldi's latest national property requirements brochure emphasises this point (Page 3): <https://cdn.aldi-digital.co.uk/PDVHMWD4D4guhJJeertvnWSMl0l.pdf>.

In the context of the town centre development scheme, it is clear that the recently approved discount foodstore unit (tailored for Lidl) is unable to accommodate Aldi's minimum net sales area requirement or format, as it only contains a smaller sales area of 1,265 sq.m and differs in terms of overall size and shape. The B&M unit (Unit C1) would equally be unable to meet Aldi's format requirements, this is given its linear shape and fact that it only contains 497 sq.m of convenience goods floorspace. The remaining unit which sits alongside B&M (Unit C2) would equally be unable to accommodate Aldi, given its much smaller net sales area of 764 sq.m. Finally, it is clear that the smaller 'flexible use' retail units (totalling 527 sq.m) would be unable to accommodate the Aldi foodstore, even in combination.

Accordingly, in the case of each of the proposed town centre units (which have been tailored for specific end users and subject to detailed planning consents), none meet Aldi's established format requirements which critically necessitates a net sales area of at least 1,315 sq.m, with 1,056 sq.m (80%) of this capable of stocking convenience goods. On this basis, none of the retail units granted permission as part of the Ingram Rd / Northway scheme can be regarded as 'suitable' alternatives for the scale and form of retail development proposed and must be dismissed on this basis.

1. Skelmersdale Town Centre Redevelopment Proposal, Ingram Rd / Northway, Skelmersdale

<p>Availability</p>	<p>Turning to the matter of 'availability', the circumstances in the case of the proposed discount foodstore at Ingram Rd / Northway appear to be quite clear. St Modwen announced in September 2018 that the unit they were applying for was tailored for Lidl and that Lidl was the end user. See press release below: https://www.stmodwen.co.uk/st-modwen-submits-planning-application-for-new-skelmersdale-store/</p> <p>In such circumstances, the Ingram Rd / Northway site is evidently not 'available' to accommodate the scale and form of retail development being proposed by Aldi – which differs from Lidl's model. Further, with contracts seemingly exchanged between Lidl and St Modwen, it is considered highly unlikely that the discount foodstore element of the town centre scheme is 'on the market' for acquisition by Aldi or indeed any other retailer. The same can equally be said of Unit C1 of the town centre scheme, with this evidently designed for the confirmed end user B&M.</p> <p>In making these comments, we would highlight that we have been mindful of the Aldergate Properties Ltd vs. Mansfield District Council high court decision (2016). However, we would argue that the specifics of that case are not directly comparable to the position in Skelmersdale. In Mansfield, the applicants excluded from their sequential site search all opportunities within Mansfield town centre because the foodstore operator who would occupy the proposed unit (Aldi) argued that it would overlap with the catchment of their existing store to the extent that developing any town centre sites would effectively be unviable.</p> <p>The situation is entirely different in the case of Skelmersdale, with contracts seemingly exchanged between St Modwen and Lidl and planning permission granted at Ingram Rd / Northway for a Lidl specific foodstore. Logic therefore dictates that the site is not available to Aldi (or anyone else) for the scale and form of retail development that is proposed at High Street.</p> <p>Indeed, to take this a step further, as soon as construction of the Lidl foodstore commences (which we envisage will be within the coming months), the sequential test becomes irrelevant, as there simply is no longer a comparable market opportunity within the town centre to debate – it will be in the process of delivery and cannot therefore be seen as 'available' by any real-world measure. Accordingly, the weight to be attached to the Ingram Rd / Northway site at this point in time as a sequential alternative is questionable.</p>
<p>Market Opportunity Factors</p>	<p>An important point to make when applying the sequential test in the context of the discount foodstore 'market opportunity' at Ingram Rd / Northway is that the consented Lidl will effectively be replacing the discount foodstore offer currently provided in the town centre by Aldi at the Concourse Shopping Centre – given the intended closure of this foodstore.</p> <p>Lidl are already seemingly prepared to take the Ingram Rd / Northway site despite the existence of a mainstream discount foodstore already serving Skelmersdale (Aldi, Concourse Shopping Centre). We would agree that Skelmersdale's Primary Catchment Area of some 55,000 people (£110m convenience goods expenditure) is certainly large enough to sustain two discount foodstores and it appears that Lidl hold the same view.</p> <p>Accordingly, it surely follows that the closure and relocation of Aldi from the Concourse Shopping Centre to High Street has little bearing on the 'market opportunity' for a second discount foodstore to serve Skelmersdale, as there will be two such stores whether Aldi relocate or not.</p>

1. Skelmersdale Town Centre Redevelopment Proposal, Ingram Rd / Northway, Skelmersdale


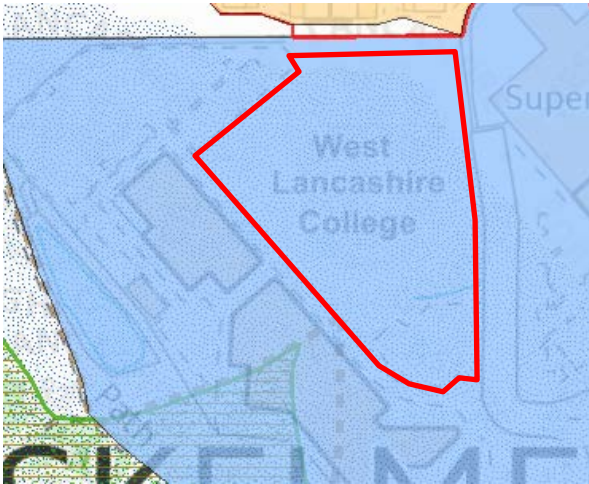
	<p>This is an important factor in applying the sequential test, as it cannot be said that both retailers are competing for a single market opportunity in Skelmersdale. Commercial evidence suggests that there are at least two such opportunities in Skelmersdale, with the two retailers seemingly already prepared to trade alongside one another based on the existing position in the town centre.</p>
<p>Conclusion</p>	<p>In conclusion, the Ingram Rd / Northway site in Skelmersdale town centre is an in-centre site with a lengthily recently planning history. Since 2012 it has been granted permission for mixed-use development proposals which will deliver a combination of both retail and leisure uses, including a cinema, foodstore and non-food retail uses.</p> <p>In 2018, two applications were submitted in tandem which sought to fix the final details of the town centre scheme ahead of its phased construction. A Section 73 application will, amongst other things, enable retail Unit C to be split into two clearly defined units, one of which (2,062 sq.m GIA) will accommodate B&M and the other a non-food retailer of 1,091 sq.m GIA. The second application sought detailed permission for a discount foodstore of 2,008 sq.m GIA / 1,265 sq.m net to specifically meet the requirements of Lidl in terms of size, format and operation, with Lidl confirmed as the end user for the unit. Both of these applications were granted permission in September 2019.</p> <p>In examining the Ingram Rd / Northway scheme's 'suitability' to accommodate the scale and form of retail development proposed, it is significant that the Aldi foodstore would have a Gross Internal Area of 1,786 sq.m and a net sales area of 1,315 sq.m. This net sales area in particular is a minimum requirement for the retailer as part of all new stores because it is this that their store format (and by extension their business model) is based upon.</p> <p>In the context of the town centre development scheme, it is clear that the recently approved discount foodstore unit is unable to accommodate Aldi's minimum net sales area requirement or format, with it being tailored specifically for Lidl. The B&M unit (Unit C1) would equally be unable to meet Aldi's format requirements, given that it only contains 497 sq.m of convenience goods floorspace. The remaining non-food unit which sits alongside B&M (Unit C2) is ruled out as it has a much smaller net sales area of 764 sq.m. Finally, the proposed 'flexible use' retail units (totalling 527 sq.m) would be too small to accommodate the Aldi foodstore, even in combination.</p> <p>On this basis, none of the retail units granted permission as part of the Ingram Rd / Northway scheme can be regarded as 'suitable' alternatives for the scale and form of retail development proposed. The Ingram Rd / Northway scheme must therefore be dismissed as a sequentially preferable alternative to the planning application site.</p> <p>Turning to 'availability', the Ingram Rd / Northway site is evidently not 'available' to accommodate the scale and form of retail development being proposed by Aldi – which differs from Lidl's model. With contracts exchanged between Lidl and St Modwen, it is considered highly unlikely that the discount foodstore element of the town centre scheme is 'on the market' for acquisition by Aldi or indeed any other retailer.</p> <p>Indeed, as soon as construction of the Lidl foodstore commences in the coming months the sequential test becomes irrelevant, as there simply is no longer a comparable market opportunity within the town centre to debate. It will be in the process of delivery and cannot therefore be seen as 'available' by any real-</p>

1. Skelmersdale Town Centre Redevelopment Proposal, Ingram Rd / Northway, Skelmersdale

world measure. Accordingly, the weight to be attached to the Ingram Rd / Northway site at this point in time as a sequential alternative is questionable.

In summary, the sequential assessment set out above has demonstrated that the Ingram Rd / Northway site does not represent a sequentially preferable alternative for the foodstore proposed on the planning application site. It is clear that the tailored units recently granted planning permission for both Lidl and B&M are neither 'suitable' nor 'available' for the specific scale, form and format of development required by Aldi.

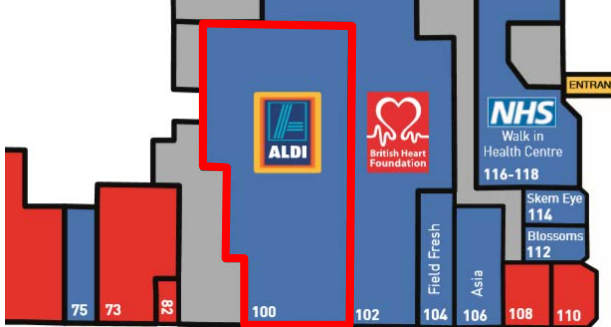
2. Land adjacent to College Way, Skelmersdale

<p>Site Image</p>	
<p>Site Area</p>	<p>The site extends to approximately 1.36ha (13,573sq.m).</p>
<p>Existing & Neighbouring Uses</p>	<p>The site is located adjacent to West Lancashire College (south-west) and an Asda superstore (east).</p>
<p>Sequential Position</p>	<p>For the purposes of the sequential test the Site is considered to be an in-centre location.</p>
<p>Policy Position</p>	<p>An extract of the Proposals Map is provided below.</p>  <p>Key</p> <ul style="list-style-type: none"> Town Centre Residential Area Site <p>The Site is located within Skelmersdale Town Centre. Policy IF1 sets out that Class A1 retail will be encouraged within town and local centres.</p>
<p>Planning Applications</p>	<p>In May 2017 planning permission (Ref. 2017/0001/FUL) was granted for the erection of a new technology centre to accommodate the construction and engineering departments of West Lancashire College within the curtilage of their Skelmersdale Campus. Subsequent applications (ref. 2018/0988/CON and 2017/0976/CON) have been made to the LPA to discharge planning conditions.</p>

2. Land adjacent to College Way, Skelmersdale

Ownership Position	The Site is understood to be in the ownership of West Lancashire College.
Suitability	<p>Whilst the site as a whole is considered large enough to accommodate a discount foodstore, permission has been granted on part of it for a new technology building to serve West Lancashire College. Should this be delivered then the residual land would not be sufficient to accommodate the scale and form of retail development proposed as part of the planning application (i.e. a site requirement of 0.8ha).</p> <p>We would also add that College Way (as the name suggests) is a cul-de-sac vehicular route which serves only West Lancashire College and appears to be privately owned. Accordingly, a discount foodstore on College Way would have no visibility or vehicular access from Ingram or Northway – which are the closest public highways in the vicinity of the land. This factor renders the site unsuitable for retail development from a commercial perspective, and we would also add that there would be inevitable safety issues associated with a foodstore relying upon a vehicular route which also serves a large local college.</p>
Availability	<p>The land is understood to be in the ownership of West Lancashire College and planning permission on part of it has previously been granted for a new technology building to serve the college. Planning conditions have subsequently been discharged to enable this scheme to commence – indicating the college's desire to redevelop the land for educational purposes in the near future.</p> <p>Given that the land at College Way is evidently the optimum location upon which to expand the college facilities in the future (as evidenced by the recent planning permission), it is considered highly unlikely that it would be made available for redevelopment for alternative purposes such as retail development. Accordingly, the College Way site can be dismissed as unavailable to accommodate the scale and form of retail development proposed.</p>
Conclusions	<p>In summary, whilst this site is located within Skelmersdale town centre and is in principle large enough to accommodate a discount foodstore, much of the land already benefits from planning permission for a new college technology centre and the residual area is insufficient to accommodate the proposed scale and form of retail development. Furthermore, the land (which is in the ownership of West Lancashire College) represents the optimum location upon which to expand the college facilities over time. Accordingly, it is considered very unlikely that it would be made available to the applicant for redevelopment for retail purposes. On this basis, it must be concluded that the College Way land is not a sequentially preferable alternative to the application site.</p>

3. Existing Aldi Foodstore, Ground Floor, Concourse Shopping Centre, Skelmersdale

<p>Site Image</p>	
<p>Unit Area</p>	<p>The existing Aldi foodstore extends to 1,080 sq.m GIA / 887sq.m net sales. Aldi has decided to vacate the premises given that it no longer meets their corporate requirements, providing only broadly two-thirds of the net sales area required by their modern format stores.</p>
<p>Existing & Neighbouring Uses</p>	<p>The Aldi foodstore is located on the ground floor of the shopping centre mall, opposite the indoor market facilities and next to the British Heart Foundation charity shop. There is no direct customer car parking adjacent to the unit, with this accessed via the mall entrance / exit to the west.</p>
<p>Sequential Position</p>	<p>As the Concourse Shopping Centre falls within Skelmersdale town centre the existing Aldi store must be regarded as an in-centre site.</p>
<p>Policy Position</p>	<p>The Concourse Shopping Centre is located within Skelmersdale Town Centre. Policy IF1 sets out that Class A1 retail will be encouraged within town and local centres.</p>
<p>Planning Applications</p>	<p>There have been no planning applications of relevance at the Aldi foodstore unit within the Concourse Shopping Centre over the recent past.</p>
<p>Ownership Position</p>	<p>It is understood that the unit is ultimately owned by London & Cambridge Properties.</p>
<p>Suitability</p>	<p>The scale and form of retail development proposed is a discount foodstore of 1,786sqm GIA / 1,315sqm net sales. The foodstore would be accompanied by a divisible retail unit of 372sq.m, alongside requisite customer car parking (151 spaces), access roads, servicing area and associated hard and soft landscaping.</p> <p>Even ignoring the ancillary divisible unit, car parking, landscaping and servicing requirements, it is necessary for any alternative site / unit to provide a commensurate amount of retail sales floorspace to the development proposal (i.e. 1,315 sq.m net). In the case of the existing Aldi unit on the ground floor of the Concourse Centre, even its gross floorspace of 1,080 sq.m is less than Aldi's net sales area requirement for a modern store. The net sales area that the unit currently achieves (887 sq.m) is only broadly two thirds of Aldi's modern format requirements. This has been a key factor in Aldi's decision to vacate the premises, it simply no longer meets their business model requirements by virtue of its limited size and can be dismissed as a sequentially preferable alternative on this basis.</p> <p>In addition to the existing unit's insufficient size, a further constraint of Aldi's existing Concourse Centre location is that the mall is unable to offer the</p>


3. Existing Aldi Foodstore, Ground Floor, Concourse Shopping Centre, Skelmersdale

	<p>adjacent, dedicated surface level car parking which Aldi shoppers expect and which competing foodstores elsewhere in Skelmersdale are able to provide. This factor has significantly impacted upon sales at the store, as customers with a trolley loaded with goods are forced to walk some distance through the mall and then east or north to the surface level or multi-storey car parks.</p> <p>Indeed, this walk exceeds the distance between the proposed Aldi foodstore on High Street and Sandy Lane Local Centre (170m) and the available public realm is not geared towards pushing a trolley this distance. Accordingly, Aldi find that the existing store is largely frequented by basket shoppers who are purchasing a lesser number of items in view of the accessibility constraints from the available car parking.</p> <p>The fact that the access arrangements to the available car parking at the Concourse Centre is so inconvenient for Aldi's shopping trolley users is considered to be a further reason why this site is not 'suitable' for the scale and form of discount foodstore proposed. This is particularly given that the primary focus of Aldi's business model is to serve 'bulk' food shoppers who are seeking to purchase a wide range of staple goods on a weekly basis.</p> <p>Finally, other than on Thursday and Friday, the Concourse Shopping Centre closes at 17:30. This is considerably earlier than Aldi's nation-wide opening hours of 08:00 to 22:00, Monday to Saturday. Again, this is a constraint of the existing unit that Aldi would not be able to accept had they been looking to locate in Skelmersdale in the present day. It is also one that any other mainstream convenience goods retailer would likely be unable to accept, given the shopping patterns of modern consumers. This represents a further reason why the existing Aldi unit is 'unsuitable' in our view.</p>
<p>Availability</p>	<p>Whilst the unit is not currently available, it is Aldi's intention to vacate the premises irrespective of this planning application as it no longer conforms to their current store format (providing only broadly two-thirds of the required sales space). Accordingly, for the purposes of our sequential assessment we have regarded this unit as 'available'.</p>
<p>Conclusions</p>	<p>In conclusion, Aldi's existing foodstore in the Concourse Shopping Centre, Skelmersdale achieves only broadly two thirds of the retailer's present-day net sales area requirements (1,315 sq.m). This has been a key factor in Aldi's decision to vacate the premises. It simply no longer conforms with their business model by virtue of its limited size and can be dismissed as 'unsuitable' on this basis.</p> <p>A further suitability constraint is the fact that the access arrangements to the available car parking at the Concourse Centre is very difficult for Aldi's shopping trolley users. It involves a significant walk of close to 200m (minimum) through the mall and then on to the surface level or multi-storey car park. An Aldi store's primary focus is to serve the needs of 'bulk' food shoppers seeking to purchase a wide range of staple goods on a weekly basis, this constraint prevents the unit achieving this objective and renders it unsuitable.</p> <p>Finally, the Concourse Shopping Centre closes at 17:30 on most days of the week and this is considerably earlier than Aldi's nation-wide opening hours. Aldi would not be able to accept this restriction had they been looking to locate in Skelmersdale in the present day and, as such, the limited opening hours available represents a further reason why the existing unit is 'unsuitable' in our view.</p> <p>Given the above evidence, it must be concluded that whilst Aldi's existing unit is 'available' (acknowledging Aldi's impending departure), there are a variety</p>

3. Existing Aldi Foodstore, Ground Floor, Concourse Shopping Centre, Skelmersdale

of reasons why it would not be 'suitable' for occupation by the retailer in the present day. Accordingly, it is not a sequentially preferable alternative to the application site.


4. Unit 31, First Floor, Concourse Shopping Centre, Skelmersdale

<p>Site Image</p>	
<p>Unit Area</p>	<p>Unit 31 of the Concourse Shopping Centre appears to be the largest vacant unit in the shopping centre at the present time. It extends to 1,390 sq.m GIA.</p>
<p>Existing & Neighbouring Uses</p>	<p>Unit 31 is located on the first floor of the shopping centre mall, close to retailers including Wilko and CEX and banks including Barclays and TSB. There is no direct customer car parking adjacent to the unit, with this accessed via the mall entrance / exit to the north.</p>
<p>Sequential Position</p>	<p>As the Concourse Shopping Centre falls within Skelmersdale town centre the existing Aldi store must be regarded as an in-centre site.</p>
<p>Policy Position</p>	<p>The Site is located within Skelmersdale Town Centre. Policy IF1 sets out that Class A1 retail will be encouraged within town and local centres.</p>
<p>Planning Applications</p>	<p>We cannot find any planning applications of relevance at Unit 31 of the Concourse Shopping Centre within the recent past.</p>
<p>Ownership Position</p>	<p>It is understood that the unit is in the ownership of London & Cambridge Properties.</p>
<p>Suitability</p>	<p>In applying the sequential test, it is necessary for any alternative unit to provide a commensurate amount of floorspace to the proposed discount foodstore. In the case of Unit 31 of the Concourse Centre, its gross area of 1,390 sq.m is 25% less than that of Aldi's proposed store (1,786sqm GIA). Accordingly, even allowing for a degree of flexibility, Unit 31 would be unable to achieve Aldi's critical net sales area target of 1,315 sq.m alongside all necessary back-of-house provision. The unit must therefore be regarded as 'unsuitable' for the scale and form of development proposed by virtue of its size.</p> <p>In addition to Unit 31's insufficient size, a further constraint is that the first floor of a shopping mall is unable to offer the adjacent, dedicated surface level car parking which Aldi shoppers expect and which competing foodstores elsewhere in Skelmersdale are able to provide. This constraint would render the location unviable for Aldi's business model, as customers with a trolley loaded with goods would be forced to walk some distance through the mall (including potentially down one level) and then north to the surface level or multi-storey car parks.</p>

4. Unit 31, First Floor, Concourse Shopping Centre, Skelmersdale

	<p>The fact that the pedestrian access arrangements from the first-floor level of the Concourse Shopping Centre to available car parking is so challenging for shopping trolley users is considered to be a further reason why this unit is not 'suitable' for the scale and form of discount foodstore proposed. This is particularly given that the primary focus of Aldi's business model is to serve 'bulk' food shoppers who are seeking to purchase a wide range of staple goods on a weekly basis.</p> <p>Finally, other than on Thursday and Friday, the Concourse Shopping Centre closes at 17:30. This is considerably earlier than Aldi's nation-wide opening hours of 08:00 to 22:00, Monday to Saturday. Again, this is a constraint that Aldi would not be able to accept had they been looking to locate in Skelmersdale in the present day. It is also one that any other mainstream convenience goods retailer would likely be unable to accept, given the shopping patterns of modern consumers. This represents a further reason why Unit 31 is 'unsuitable' in our view.</p>
Availability	<p>The unit is currently vacant and appears to be available for lease. It must therefore be regarded as 'available' in the context of the sequential approach.</p>
Conclusions	<p>In conclusion, Unit 31 of the Concourse Shopping Centre in Skelmersdale town centre has a gross floorspace some 25% smaller than Aldi's proposed store. Even allowing for some flexibility, it would be unable to achieve Aldi's critical net sales area target of 1,315 sq.m alongside all necessary back-of-house provision. It must therefore be regarded as 'unsuitable' for the scale and form of development proposed.</p> <p>A further suitability constraint is the fact that pedestrian access to the available car parking at the Concourse Centre is particularly difficult for shopping trolley users from first floor level. It involves a lengthily walk through the mall (including potentially down one level) and then on to the surface level or multi-storey car park. An Aldi store's primary focus is to serve the needs of 'bulk' food shoppers seeking to purchase a wide range of staple goods on a weekly basis, this constraint prevents Unit 31 achieving this objective and renders it unsuitable.</p> <p>Finally, the Concourse Shopping Centre closes at 17:30 on all but two days of the week and this is considerably earlier than Aldi's nation-wide opening hours. Aldi are unable to accept this restriction as evidenced by the operational hours that they seek for all of their new foodstores (08:00 to 22:00). The limited opening hours available at the Concourse Centre represents a further reason why the existing unit is 'unsuitable' in our view.</p> <p>Given the above evidence, it must be concluded that whilst Unit 31 is evidently 'available', there are a variety of reasons why it would not be 'suitable' for occupation by Aldi in the present day. Accordingly, it is not a sequentially preferable alternative to the application site.</p>

5. Land to the north of Up Holland Local Centre, Up Holland

<p>Site Image</p>	
<p>Site Area</p>	<p>Land to the rear of Up Holland Local Centre is irregular in shape and extends to approximately 0.60ha.</p>
<p>Existing & Neighbouring Uses</p>	<p>The land in question forms part of the recreational space associated with St Thomas the Martyr CoE Primary School, with access taken from Highgate Road. Immediately south is Up Holland Local Centre (Ormskirk Road), with the primary school to the north and residential properties to the east and west. It is noted that in addition to the recreational space the site benefits from mature trees along its boundaries with surrounding residential properties.</p>
<p>Sequential Position</p>	<p>As the site is located immediately north of Up Holland Local Centre it can be regarded as a well-connected edge-of-centre location.</p>
<p>Policy Position</p>	<p>The site is allocated for Green Infrastructure / Open Recreation Space by Policy EN3 of the adopted Local Plan. This policy states that generally speaking the loss of open space and recreational facilities will not be acceptable unless a wide range of criteria are met by the development proposal.</p>
<p>Planning Applications</p>	<p>We cannot identify any planning applications of relevance on the appraisal site in the recent past.</p>
<p>Ownership Position</p>	<p>Ownership is unknown but given that the land forms part of existing school playing field facilities, it is anticipated that it is owned by West Lancashire Borough Council.</p>
<p>Suitability</p>	<p>With regards this site's suitability, it can only accommodate some 0.6ha of development and therefore, even allowing for flexibility, it is unable to cater for the minimum sequential search parameter of 0.8ha. Accordingly, land to the north of Up Holland Local Centre must be dismissed on the basis of its size.</p> <p>The site also suffers from a policy constraint in that it is allocated for Green Infrastructure / Open Recreation Space and there is therefore a policy presumption against development that would result in the loss of this amenity. It is considered unlikely that the scheme would meet the criteria required to demonstrate compliance with this policy test. For example, the recreational space is clearly well-located and well-used and is therefore not a good candidate for redevelopment at the present time. It must therefore be regarded as unsuitable given this policy constraint.</p>

5. Land to the north of Up Holland Local Centre, Up Holland

	<p>Finally, vehicular access to the appraisal site is along a narrow residential street (Highgate Road). Customer vehicle and heavy goods vehicle movements along this road are unlikely to be regarded as acceptable to the local highway authority. This is therefore a further reason why land to the north of Up Holland Local Centre must be regarded as unsuitable.</p>
Availability	<p>The land to the north of Up Holland Local Centre appears to be in use as recreational space associated with St Thomas the Martyr CoE Primary School. Accordingly, it would appear highly unlikely that the owner of the land (believed to be West Lancashire Borough Council) would be willing to sell it to Aldi or indeed any other retailer. It is therefore reasonable to assume that the recreational area is not available to accommodate the development proposals.</p>
Conclusions	<p>In conclusion, this appraisal has highlighted that the edge-of-centre recreational land to the north of Up Holland Local Centre is of insufficient size to accommodate the proposed development (even allowing for flexibility) and must therefore be dismissed as unsuitable. Furthermore, it is protected Green Infrastructure / Open Recreation Space (Policy E3) in the adopted Local Plan and this policy constraint also renders the site unsuitable. Finally, the site's access and egress along a narrow residential street (Highgate Road) is also likely to be unacceptable and a further reason for the site being deemed unsuitable. In addition to these suitability constraints, we do not believe that the land would be made available to the applicant for redevelopment, as it is in use as recreational space associated with a primary school.</p> <p>Given the above evidence, it must be concluded that the land to the north of Up Holland Local Centre is neither suitable nor available. Accordingly, it is evidently not a sequentially preferable alternative to the application site.</p>

Appendix IV

Retail Impact Assessment

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 1. TURNOVER OF PROPOSED DEVELOPMENT

Retail Development High Street, Skelmersdale		Gross Floorspace (sq. m)	Net Floorspace (sq. m)	Turnover per sq. m in 2019 (£m)	Period to Test Year					
					2019	2020	2021	2022	2023	2024
Aldi Foodstore	Convenience	1,786	1,052	£11,147	£11.73	£11.77	£11.80	£11.82	£11.84	£11.87
	Comparison		263	£7,409	£1.95	£2.00	£2.05	£2.11	£2.17	£2.23
	Total		1,315	-	£13.68	£13.77	£13.85	£13.93	£14.01	£14.10
Retail Unit	Convenience	372	149	£5,000	£0.74	£0.75	£0.75	£0.75	£0.75	£0.75
	Comparison		149	£5,000	£0.74	£0.76	£0.78	£0.81	£0.83	£0.85
	Total		298	-	£1.49	£1.51	£1.53	£1.56	£1.58	£1.60
Convenience turnover					£12.47	£12.52	£12.55	£12.57	£12.60	£12.62
Comparison turnover					£2.69	£2.76	£2.84	£2.92	£3.00	£3.08
Total					£15.16	£15.28	£15.38	£15.49	£15.59	£15.70

Notes:

- a. Gross floorspace of proposed retail development sourced from architectural drawings.
- b. Net sales area and convenience goods / comparison goods floorspace split of Aldi provided by operator.
- c. Net sales area and convenience goods / comparison goods floorspace split of additional unit is an assumption by Avison Young.
- d. Convenience and comparison goods sales densities derived from GlobalData (formally Verdict) for Aldi. Sales density for additional unit is an Avison Young assumption.
- e. Turnover projected forwards using Experian forecast sales densities from Figures 4a and 4b (Page 14) of Experian Retail Planner Briefing Note 16, December 2018.

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 2(a): POPULATION WITHIN EACH ZONE OF CATCHMENT AREA

ZONE	POPULATION												
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1		28,480	28,519	28,540	28,595	28,659	28,705	28,765	28,809	28,854	28,905	28,964	28,999
2a		13,201	13,222	13,231	13,251	13,257	13,270	13,282	13,305	13,305	13,332	13,353	13,379
2b		33,103	33,099	33,130	33,131	33,128	33,162	33,182	33,232	33,267	33,288	33,296	33,313
3a		16,847	16,882	16,930	16,971	17,021	17,063	17,129	17,175	17,212	17,240	17,272	17,295
3b		37,355	37,476	37,548	37,643	37,754	37,873	37,996	38,102	38,239	38,381	38,535	38,684
TOTAL		128,986	129,198	129,379	129,591	129,819	130,073	130,354	130,623	130,877	131,146	131,420	131,670

Notes:

- a. Zones based on the same post code sectors as outlined for Zones 1, 2a, 2b, 3a and 3b of the West Lancashire Retail and Leisure Study (2018)
- b. Population derived from Experian Location Analyst data (23 September 2019 Report)
- c. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

TABLE 2(b): PER CAPITA CONVENIENCE EXPENDITURE WITHIN EACH ZONE OF CATCHMENT AREA (EXCLUDING NON STORE RETAIL TRADE DEDUCTION)

ZONE	CONVENIENCE GOODS EXPENDITURE PER HEAD (EXCLUDING NSRT DEDUCTION)												
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1 (Buffer)	£2,368	£2,394	£2,404	£2,406	£2,413	£2,413	£2,418	£2,420	£2,423	£2,425	£2,428	£2,433	£2,435
2a (Buffer)	£2,311	£2,336	£2,346	£2,348	£2,355	£2,355	£2,360	£2,362	£2,365	£2,367	£2,369	£2,374	£2,376
2b (Buffer)	£2,480	£2,507	£2,517	£2,520	£2,527	£2,527	£2,532	£2,535	£2,538	£2,540	£2,543	£2,548	£2,550
3a (PSA)	£2,415	£2,442	£2,451	£2,454	£2,461	£2,461	£2,466	£2,469	£2,471	£2,473	£2,476	£2,481	£2,483
3b (PSA)	£1,903	£1,924	£1,932	£1,934	£1,939	£1,939	£1,943	£1,945	£1,947	£1,949	£1,951	£1,955	£1,957
ANNUAL GROWTH		1.1%	0.4%	0.1%	0.3%	0.0%	0.2%	0.1%	0.1%	0.1%	0.1%	0.2%	0.1%

Notes:

- a. Per capita expenditure derived from Experian Location Analyst data (23 September 2019 Report)
- b. Per capita expenditure projected forward using forecast growth rates taken from Figure 6, Appendix 3 of Experian Retail Planner Briefing Note 16 (December 2018)
- c. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

2017 Prices

TABLE 2(c): PER CAPITA CONVENIENCE EXPENDITURE WITHIN EACH ZONE OF CATCHMENT AREA (INCLUDING NON STORE RETAIL TRADE DEDUCTION)

ZONE	CONVENIENCE GOODS EXPENDITURE PER HEAD (INCLUDING NSRT DEDUCTION)												
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1 (Buffer)	£2,287	£2,305	£2,307	£2,303	£2,307	£2,302	£2,302	£2,302	£2,302	£2,299	£2,302	£2,304	£2,304
2a (Buffer)	£2,232	£2,250	£2,252	£2,247	£2,252	£2,247	£2,247	£2,246	£2,246	£2,244	£2,246	£2,248	£2,248
2b (Buffer)	£2,396	£2,415	£2,417	£2,411	£2,416	£2,411	£2,411	£2,411	£2,411	£2,408	£2,410	£2,413	£2,413
3a (PSA)	£2,333	£2,351	£2,353	£2,348	£2,353	£2,348	£2,348	£2,348	£2,347	£2,345	£2,347	£2,349	£2,349
3b (PSA)	£1,838	£1,853	£1,854	£1,850	£1,854	£1,850	£1,850	£1,850	£1,850	£1,848	£1,850	£1,851	£1,851
ANNUAL DEDUCTION	3.4%	3.7%	4.0%	4.3%	4.4%	4.6%	4.8%	4.9%	5.0%	5.2%	5.2%	5.3%	5.4%

Notes:

- a. Per capita expenditure derived from Experian Location Analyst data (September 2019 Report)
- b. Expenditure excludes Non Store Retail Trade in line with 'adjusted' allowance derived from Figure 5, Appendix 3 of Experian Retail Planner Briefing Note 16 (December 2018)
- c. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

2017 Prices

TABLE 2(d): TOTAL CONVENIENCE GOODS EXPENDITURE WITHIN CATCHMENT AREA

ZONE	TOTAL CONVENIENCE GOODS EXPENDITURE												
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1 (Buffer)		£65.66	£65.81	£65.72	£65.97	£65.98	£66.08	£66.21	£66.31	£66.34	£66.53	£66.72	£66.80
2a (Buffer)		£29.70	£29.78	£29.73	£29.84	£29.79	£29.81	£29.84	£29.89	£29.85	£29.95	£30.02	£30.08
2b (Buffer)		£79.93	£79.99	£79.89	£80.05	£79.88	£79.95	£79.99	£80.11	£80.11	£80.24	£80.33	£80.37
3a (PSA)		£39.61	£39.73	£39.76	£39.93	£39.96	£40.06	£40.21	£40.32	£40.36	£40.47	£40.58	£40.63
3b (PSA)		£69.21	£69.49	£69.48	£69.79	£69.85	£70.06	£70.29	£70.48	£70.66	£70.99	£71.34	£71.61
TOTAL		£284.11	£284.79	£284.58	£285.58	£285.46	£285.96	£286.54	£287.11	£287.32	£288.16	£289.00	£289.49

Notes:

- a. Total available expenditure calculated by multiplying population from Table 2(a) by expenditure per head (minus NSRT deduction) from Table 2(c)
- b. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 3: CONVENIENCE GOODS SHOPPING PATTERNS 2019 (£m and %)

DESTINATION	1 (Buffer)		2a (Buffer)		2b (Buffer)		3a (PSA)		3b (PSA)		Total Study Area	
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)
Zone 1												
Tesco, Meols Cop, Southport	11.2%	£7.34	3.9%	£1.16	5.1%	£4.08	0.3%	£0.12	0.7%	£0.49	4.5%	£12.82
Booths, Station Road, Hesketh Bank Village Centre	8.7%	£5.69	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	1.9%	£5.41
Tarleton Village Centre	5.6%	£3.69	0.0%	£0.00	0.5%	£0.40	0.0%	£0.00	0.0%	£0.00	1.4%	£3.99
Other, Zone 1	2.3%	£1.51	0.0%	£0.00	0.0%	£0.00	0.3%	£0.12	0.0%	£0.00	0.6%	£1.71
Sub Total (Zone 1)	27.7%	£18.23	3.9%	£1.16	5.6%	£4.48	0.7%	£0.24	0.7%	£0.49	8.4%	£23.92
Zone 2a												
Tesco, Liverpool Road North, Burscough Town Centre	7.8%	£5.13	25.8%	£7.68	2.3%	£1.84	5.4%	£2.15	0.7%	£0.49	6.0%	£17.09
Other, Burscough Town Centre	0.2%	£0.13	8.6%	£2.56	0.7%	£0.56	2.0%	£0.79	0.3%	£0.21	1.5%	£4.27
Total Burscough Town Centre	7.9%	£5.20	34.4%	£10.24	3.0%	£2.40	7.5%	£2.98	1.0%	£0.69	7.5%	£21.36
Zone 2a												
Aldi, Ringtail Retail Park, Burscough	8.0%	£5.26	26.8%	£7.98	8.3%	£6.64	3.6%	£1.43	4.4%	£3.06	8.5%	£24.21
Booths, Ringtail Retail Park Burscough	1.5%	£0.99	9.6%	£2.86	2.6%	£2.08	3.9%	£1.55	0.5%	£0.35	2.7%	£7.69
Other, Zone 2a	0.0%	£0.00	0.1%	£0.03	0.2%	£0.16	0.1%	£0.04	0.0%	£0.00	0.1%	£0.28
Sub Total (Zone 2a)	17.4%	£11.45	70.9%	£21.11	14.1%	£11.28	15.0%	£6.00	5.9%	£4.10	18.8%	£53.54
Zone 2b												
Morrisons, Park Road, Ormskirk Town Centre	0.3%	£0.20	4.0%	£1.19	27.5%	£22.00	1.1%	£0.44	5.2%	£3.61	9.7%	£27.62
Aldi, Two Saints Place, Ormskirk Town Centre	0.8%	£0.53	2.7%	£0.80	17.3%	£13.84	0.7%	£0.28	1.1%	£0.76	5.7%	£16.23
M&S Foodhall, Aughton Street, Ormskirk Town Centre	0.0%	£0.00	1.8%	£0.54	4.4%	£3.52	0.0%	£0.00	1.5%	£1.04	1.8%	£5.13
Other, Ormskirk Town Centre	1.2%	£0.79	4.9%	£1.46	14.4%	£11.52	1.4%	£0.56	2.5%	£1.74	5.6%	£15.95
Total Ormskirk Town Centre	2.4%	£1.58	13.4%	£3.99	63.6%	£50.87	3.3%	£1.31	10.3%	£7.16	22.8%	£64.93
Zone 2b												
Other, Zone 2b	0.4%	£0.26	1.4%	£0.42	2.0%	£1.60	0.0%	£0.00	0.3%	£0.21	0.9%	£2.56
Sub Total (Zone 2b)	2.8%	£1.84	14.8%	£4.41	65.6%	£52.47	3.3%	£1.31	10.6%	£7.37	23.7%	£67.50
Zone 3a												
Co op Food, Ormskirk Road, Up Holland Village Centre	0.0%	£0.00	0.6%	£0.18	0.0%	£0.00	2.9%	£1.15	0.0%	£0.03	0.5%	£1.42
Other, Zone 3a	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	5.9%	£2.34	0.0%	£0.03	0.8%	£2.28
Sub Total (Zone 3a)	0.0%	£0.00	0.6%	£0.18	0.0%	£0.00	8.8%	£3.50	0.1%	£0.06	1.3%	£3.70
Zone 3b												
Asda, Ingram Road, Skelmersdale Town Centre	0.0%	£0.00	2.6%	£0.77	4.0%	£3.20	25.7%	£10.21	37.5%	£26.06	14.4%	£41.01
Aldi, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.2%	£0.16	3.0%	£1.19	11.1%	£7.71	3.3%	£9.40
Iceland, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	1.3%	£0.52	3.5%	£2.43	1.1%	£3.13
Other, Skelmersdale Town Centre	0.0%	£0.00	0.4%	£0.12	0.2%	£0.16	2.0%	£0.79	12.3%	£8.55	3.5%	£9.97
Total Skelmersdale Town Centre	0.0%	£0.00	3.0%	£0.89	4.4%	£3.52	31.9%	£12.67	64.4%	£44.75	22.3%	£63.51
Zone 3b												
Other, Zone 3b	0.0%	£0.00	0.5%	£0.15	0.2%	£0.16	1.4%	£0.56	6.1%	£4.24	1.8%	£5.13
Sub Total (Zone 3b)	0.0%	£0.00	3.5%	£1.04	4.6%	£3.68	33.3%	£13.23	70.5%	£48.99	24.1%	£68.63
SUB-TOTAL STUDY AREA	47.8%	£31.52	93.7%	£27.90	89.7%	£71.91	61.0%	£24.27	87.7%	£61.00	76.2%	£217.01
OUTSIDE STUDY AREA												
Outside Study Area, Sefton												
Morrisons, Winter Gardens, Southport Town Centre	7.9%	£5.20	0.0%	£0.00	0.2%	£0.16	0.3%	£0.12	0.2%	£0.14	1.9%	£5.41
Asda, Central Twelve Shopping Park, Southport TC	7.7%	£5.07	0.1%	£0.03	1.1%	£0.88	0.0%	£0.00	0.0%	£0.00	2.0%	£5.70
Sainsbury's, St Georges Place, Southport Town Centre	4.6%	£3.03	1.3%	£0.39	0.7%	£0.56	0.0%	£0.00	0.0%	£0.00	1.4%	£3.99
Lidl, Virginia Street, Southport Town Centre	6.4%	£4.21	0.2%	£0.06	0.1%	£0.08	0.0%	£0.00	0.0%	£0.00	1.5%	£4.27
Other, Southport Town Centre	4.4%	£2.90	0.7%	£0.21	0.3%	£0.24	0.0%	£0.00	0.7%	£0.49	1.3%	£3.70
Total Southport Town Centre	30.9%	£20.33	2.3%	£0.68	2.4%	£1.92	0.3%	£0.12	0.9%	£0.63	8.1%	£23.07
Outside Study Area, Sefton												
Aldi, Meols Cop Road, Southport	4.7%	£3.09	0.6%	£0.18	1.0%	£0.80	0.0%	£0.00	0.0%	£0.00	1.4%	£3.99
Other, Sefton	4.2%	£2.76	2.9%	£0.86	6.4%	£5.12	0.3%	£0.12	1.2%	£0.83	3.3%	£9.40
Sub Total (Sefton)	39.8%	£26.19	5.8%	£1.73	9.8%	£7.84	0.5%	£0.24	2.1%	£1.46	12.9%	£36.74
Outside Study Area, Wigan												
Wigan Town Centre	0.3%	£0.20	0.0%	£0.00	0.0%	£0.00	6.9%	£2.74	1.7%	£1.18	1.5%	£4.27
Asda Supercentre, Soho Street, Robin Park, Wigan	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	6.2%	£2.46	1.0%	£0.69	1.1%	£3.13
Aldi, Preston Road, Standish	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	10.7%	£4.25	0.0%	£0.00	1.5%	£4.27
Other, Wigan	1.8%	£1.18	0.0%	£0.00	0.0%	£0.00	7.7%	£3.06	5.5%	£3.82	2.9%	£8.26
Sub Total (Wigan)	2.1%	£1.38	0.0%	£0.00	0.0%	£0.00	31.5%	£12.51	8.2%	£5.70	6.9%	£19.65
Outside Study Area, South Ribble												
Leyland Town Centre	3.3%	£2.17	0.0%	£0.00	0.0%	£0.00	0.4%	£0.16	0.2%	£0.14	0.8%	£2.28
Other, South Ribble	2.9%	£1.91	0.0%	£0.00	0.0%	£0.00	0.5%	£0.20	0.0%	£0.00	0.7%	£1.99
Sub Total (South Ribble)	6.1%	£4.08	0.0%	£0.00	0.0%	£0.00	1.0%	£0.36	0.2%	£0.14	1.6%	£4.56
Outside Study Area, Other												
Sub Total (Other)	4.2%	£2.76	0.5%	£0.15	0.5%	£0.40	5.9%	£2.34	1.8%	£1.25	2.4%	£6.84
SUB-TOTAL OUTSIDE STUDY AREA	52.2%	£34.42	6.3%	£1.88	10.3%	£8.24	39.0%	£15.45	12.3%	£8.55	23.8%	£67.78
TOTAL	100.0%	£65.81	100.0%	£29.78	100.0%	£79.99	100.0%	£39.73	100.0%	£69.49	100.0%	£284.79

Notes:

- Zones based on the same post code sectors as outlined for Zones 1, 2a, 2b, 3a and 3b of the West Lancashire Retail and Leisure Study (2018)
- Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones
- Market shares for food shopping derived directly from NEMS Household Survey which informs the West Lancashire Retail and Leisure Study (2018). See Retail Study Tables 5 and 6 'Convenience Goods Shopping Patterns' 2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 4: CONVENIENCE GOODS SHOPPING PATTERNS PROJECTED FORWARDS TO 2024 (€m and %)

DESTINATION	Total	2019	2020	2021	2022	2023	2024
	(%)	(€m)	(€m)	(€m)	(€m)	(€m)	(€m)
Zone 1							
Tesco, Meols Cop, Southport	4.5%	€12.82	€12.81	€12.85	€12.85	€12.87	€12.89
Booths, Station Road, Hesketh Bank Village Centre	1.9%	€5.41	€5.41	€5.43	€5.42	€5.43	€5.44
Tarleton Village Centre	1.4%	€3.99	€3.98	€4.00	€4.00	€4.00	€4.01
Other, Zone 1	0.6%	€1.71	€1.71	€1.71	€1.71	€1.72	€1.72
Sub Total (Zone 1)	8.4%	€23.92	€23.90	€23.99	€23.98	€24.02	€24.07
Zone 2a							
Tesco, Liverpool Road North, Burscough Town Centre	6.0%	€17.09	€17.07	€17.13	€17.13	€17.16	€17.19
Other, Burscough Town Centre	1.5%	€4.27	€4.27	€4.28	€4.28	€4.29	€4.30
Total Burscough Town Centre	7.5%	€21.36	€21.34	€21.42	€21.41	€21.45	€21.49
Aldi, Ringtail Retail Park, Burscough	8.5%	€24.21	€24.19	€24.27	€24.26	€24.31	€24.36
Booths, Ringtail Retail Park Burscough	2.7%	€7.69	€7.68	€7.71	€7.71	€7.72	€7.74
Other, Zone 2a	0.1%	€0.28	€0.28	€0.29	€0.29	€0.29	€0.29
Sub Total (Zone 2a)	18.8%	€53.54	€53.50	€53.69	€53.67	€53.76	€53.87
Zone 2b							
Morrisons, Park Road, Ormskirk Town Centre	9.7%	€27.62	€27.60	€27.70	€27.69	€27.74	€27.79
Aldi, Two Saints Place, Ormskirk Town Centre	5.7%	€16.23	€16.22	€16.28	€16.27	€16.30	€16.33
M&S Foodhall, Aughton Street, Ormskirk Town Centre	1.8%	€5.13	€5.12	€5.14	€5.14	€5.15	€5.16
Other, Ormskirk Town Centre	5.6%	€15.95	€15.94	€15.99	€15.99	€16.01	€16.05
Total Ormskirk Town Centre	22.8%	€64.93	€64.88	€65.11	€65.08	€65.20	€65.33
Other, Zone 2b	0.9%	€2.56	€2.56	€2.57	€2.57	€2.57	€2.58
Sub Total (Zone 2b)	23.7%	€67.50	€67.44	€67.68	€67.65	€67.77	€67.91
Zone 3a							
Co op Food, Ormskirk Road, Up Holland Village Centre	0.5%	€1.42	€1.42	€1.43	€1.43	€1.43	€1.43
Other, Zone 3a	0.8%	€2.28	€2.28	€2.28	€2.28	€2.29	€2.29
Sub Total (Zone 3a)	1.3%	€3.70	€3.70	€3.71	€3.71	€3.72	€3.73
Zone 3b							
Asda, Ingram Road, Skelmersdale Town Centre	14.4%	€41.01	€40.98	€41.12	€41.11	€41.18	€41.26
Aldi, Concourse Centre, Skelmersdale Town Centre	3.3%	€9.40	€9.39	€9.42	€9.42	€9.44	€9.46
Iceland, Concourse Centre, Skelmersdale Town Centre	1.1%	€3.13	€3.13	€3.14	€3.14	€3.15	€3.15
Other, Skelmersdale Town Centre	3.5%	€9.97	€9.96	€10.00	€9.99	€10.01	€10.03
Total Skelmersdale Town Centre	22.3%	€63.51	€63.46	€63.68	€63.66	€63.77	€63.90
Other, Zone 3b	1.8%	€5.13	€5.12	€5.14	€5.14	€5.15	€5.16
Sub Total (Zone 3b)	24.1%	€68.63	€68.58	€68.82	€68.79	€68.92	€69.06
SUB-TOTAL STUDY AREA	76.2%	€217.01	€216.85	€217.61	€217.52	€217.90	€218.35
OUTSIDE STUDY AREA							
Outside Study Area, Sefton							
Morrisons, Winter Gardens, Southport Town Centre	1.9%	€5.41	€5.41	€5.43	€5.42	€5.43	€5.44
Asda, Central Twelve Shopping Park, Southport Town Centre	2.0%	€5.70	€5.69	€5.71	€5.71	€5.72	€5.73
Sainsbury's, St Georges Place, Southport Town Centre	1.4%	€3.99	€3.98	€4.00	€4.00	€4.00	€4.01
Lidl, Virginia Street, Southport Town Centre	1.5%	€4.27	€4.27	€4.28	€4.28	€4.29	€4.30
Other, Southport Town Centre	1.3%	€3.70	€3.70	€3.71	€3.71	€3.72	€3.73
Total Southport Town Centre	8.1%	€23.07	€23.05	€23.13	€23.12	€23.16	€23.21
Aldi, Meols Cop Road, Southport	1.4%	€3.99	€3.98	€4.00	€4.00	€4.00	€4.01
Other, Sefton	3.3%	€9.40	€9.39	€9.42	€9.42	€9.44	€9.46
Sub Total (Sefton)	12.9%	€36.74	€36.71	€36.84	€36.82	€36.89	€36.96
Outside Study Area, Wigan							
Wigan Town Centre	1.5%	€4.27	€4.27	€4.28	€4.28	€4.29	€4.30
Asda Supercentre, Soho Street, Robin Park, Wigan	1.1%	€3.13	€3.13	€3.14	€3.14	€3.15	€3.15
Aldi, Preston Road, Standish	1.5%	€4.27	€4.27	€4.28	€4.28	€4.29	€4.30
Other, Wigan	2.9%	€8.26	€8.25	€8.28	€8.28	€8.29	€8.31
Sub Total (Wigan)	6.9%	€19.65	€19.64	€19.70	€19.70	€19.73	€19.77
Outside Study Area, South Ribble							
Leyland Town Centre	0.8%	€2.28	€2.28	€2.28	€2.28	€2.29	€2.29
Other, South Ribble	0.7%	€1.99	€1.99	€2.00	€2.00	€2.00	€2.01
Sub Total (South Ribble)	1.6%	€4.56	€4.55	€4.57	€4.57	€4.58	€4.58
Outside Study Area, Other							
Sub Total (Other)	2.4%	€6.84	€6.83	€6.85	€6.85	€6.86	€6.88
SUB-TOTAL OUTSIDE STUDY AREA	23.8%	€67.78	€67.73	€67.97	€67.94	€68.06	€68.20
TOTAL	100.0%	€284.79	€284.58	€285.58	€285.46	€285.96	€286.54

Notes:

- a. Zones based on the same post code sectors as outlined for Zones 1, 2a, 2b, 3a and 3b of the West Lancashire Retail and Leisure Study (2018)
- b. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones
- c. Market shares for food shopping derived directly from West Lancashire Retail and Leisure Study (2018). See Retail Study Tables 5 and 6 'Convenience Goods Shopping Patterns'
- d. Turnovers projected forward in line with the total expenditure identified at Table 2(d)

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 5. CONVENIENCE GOODS COMMITMENTS AND TURNOVER

Site	Conv Sales Area (Sq m)	Sales Density (£/Sq m)	Turnover (£ m)					
			2019	2020	2021	2022	2023	2024
Zone 2a								
Yew Tree Farm, Burscough	236	£10,000	£2.36	£2.37	£2.37	£2.38	£2.38	£2.39
Zone 2b								
Ropers Arms, Wigan Road, Ormskirk	222	£10,000	£2.22	£2.23	£2.23	£2.24	£2.24	£2.25
Briars Lane Garage, Ormskirk	173	£7,500	£1.30	£1.30	£1.31	£1.31	£1.31	£1.31
Zone 3b								
Ingram / Southway, Skelmersdale	1,509	£8,191	£12.36	£12.41	£12.43	£12.46	£12.48	£12.51
Total	2,140	-	£18.24	£18.31	£18.35	£18.38	£18.42	£18.46

Notes:

- a. Commitments and their floorspaces taken from West Lancashire Retail and Leisure Study (2018)
- b. Sales densities for Yew Tree Farm, Ropers Arms, and Briars Lane Garage taken from West Lancashire Retail and Leisure Study (2018)
- c. Floorspace and sales density for the Ingram / Southway town centre redevelopment scheme in Skelmersdale derived from the retail impact assessment prepared in support of application Ref. 2018/0898/FUL (Approved Sept 2019)
- d. Turnovers are projected forwards using Experian Forecast sales densities from Figure 4a (Page 14) of Experian Retail Planner Briefing Note 16, December 2018.

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 6(a): PROPOSED ALDI FOODSTORE AND RETAIL UNITS CONVENIENCE GOODS TRADE DRAW (2024)

DESTINATION	2a (Buffer)	2b (Buffer)	3a (PCA)	3b (PCA)	TOTAL
Trade Drawn From Zones (%)	5.0%	10.0%	25.0%	60.0%	100.0%
Trade Drawn From Zones (£)	£0.62	£1.23	£3.08	£7.38	£12.31

TABLE 6(b): PROPOSED ALDI FOODSTORE AND RETAIL UNITS CONVENIENCE GOODS TRADE ALLOCATION (2024)

DESTINATION	2a (Buffer)		2b (Buffer)		3a (PSA)		3b (PSA)		Total	
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)
Zone 1										
Tesco, Meols Cop, Southport	1.0%	£0.01	2.5%	£0.03	1.0%	£0.03	1.0%	£0.07	1.2%	£0.14
Booths, Station Road, Hesketh Bank Village Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Tarleton Village Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Zone 1	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Zone 1)	1.0%	£0.01	2.5%	£0.03	1.0%	£0.03	1.0%	£0.07	1.2%	£0.14
Zone 2a										
Tesco, Liverpool Road North, Burscough Town Centre	27.5%	£0.17	2.5%	£0.03	5.0%	£0.15	1.0%	£0.07	3.5%	£0.43
Other, Burscough Town Centre	5.0%	£0.03	1.0%	£0.01	1.0%	£0.03	0.5%	£0.04	0.9%	£0.11
Total Burscough Town Centre	32.5%	£0.20	3.5%	£0.04	6.0%	£0.18	1.5%	£0.11	4.4%	£0.54
Aldi, Ringtail Retail Park, Burscough	40.0%	£0.25	15.0%	£0.18	10.0%	£0.31	7.5%	£0.55	10.5%	£1.29
Booths, Ringtail Retail Park Burscough	2.5%	£0.02	2.5%	£0.03	2.5%	£0.08	0.5%	£0.04	1.3%	£0.16
Other, Zone 2a	1.0%	£0.01	0.5%	£0.01	0.0%	£0.00	0.0%	£0.00	0.1%	£0.01
Sub Total (Zone 2a)	76.0%	£0.47	21.5%	£0.26	18.5%	£0.57	9.5%	£0.70	16.3%	£2.00
Zone 2b										
Morrisons, Park Road, Ormskirk Town Centre	2.5%	£0.02	25.0%	£0.31	1.0%	£0.03	5.0%	£0.37	5.9%	£0.72
Aldi, Two Saints Place, Ormskirk Town Centre	2.5%	£0.02	20.0%	£0.25	1.0%	£0.03	5.0%	£0.37	5.4%	£0.66
M&S Foodhall, Aughton Street, Ormskirk Town Centre	0.0%	£0.00	2.5%	£0.03	0.0%	£0.00	1.0%	£0.07	0.9%	£0.10
Other, Ormskirk Town Centre	2.5%	£0.02	10.0%	£0.12	2.5%	£0.08	2.5%	£0.18	3.3%	£0.40
Total Ormskirk Town Centre	7.5%	£0.05	57.5%	£0.71	4.5%	£0.14	13.5%	£1.00	15.4%	£1.89
Other, Zone 2b	0.5%	£0.00	2.5%	£0.03	0.0%	£0.00	1.0%	£0.07	0.9%	£0.11
Sub Total (Zone 2b)	8.0%	£0.05	60.0%	£0.74	4.5%	£0.14	14.5%	£1.07	16.2%	£2.00
Zone 3a										
Co op Food, Ormskirk Road, Up Holland Village Centre	0.0%	£0.00	0.0%	£0.00	2.5%	£0.08	0.5%	£0.04	0.9%	£0.11
Other, Zone 3a	0.0%	£0.00	0.0%	£0.00	2.5%	£0.08	0.5%	£0.04	0.9%	£0.11
Sub Total (Zone 3a)	0.0%	£0.00	0.0%	£0.00	5.0%	£0.15	1.0%	£0.07	1.9%	£0.23
Zone 3b										
Asda, Ingram Road, Skelmersdale Town Centre	7.5%	£0.05	7.5%	£0.09	20.0%	£0.62	37.5%	£2.77	28.6%	£3.52
Iceland, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	2.5%	£0.18	1.5%	£0.18
Other, Skelmersdale Town Centre	0.0%	£0.00	0.5%	£0.01	2.5%	£0.08	5.0%	£0.37	3.7%	£0.45
Ingram / Southway (Lidl), Skelmersdale Town Centre	2.5%	£0.02	1.0%	£0.01	10.0%	£0.31	10.0%	£0.74	8.7%	£1.07
Total Skelmersdale Town Centre	10.0%	£0.06	9.0%	£0.11	32.5%	£1.00	55.0%	£4.06	42.5%	£5.23
Other, Zone 3b	0.0%	£0.00	1.0%	£0.01	2.5%	£0.08	2.5%	£0.18	2.2%	£0.27
Aldi, High Street, Skelmersdale	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Zone 3b)	10.0%	£0.06	10.0%	£0.12	35.0%	£1.08	57.5%	£4.25	44.8%	£5.51
SUB-TOTAL STUDY AREA	95.0%	£0.58	94.0%	£1.16	64.0%	£1.97	83.5%	£6.17	80.3%	£9.88
OUTSIDE STUDY AREA										
Outside Study Area, Sefton										
Morrisons, Winter Gardens, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Asda, Central Twelve Shopping Park, Southport 1C	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sainsbury's, St Georges Place, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Lidl, Virginia Street, Southport Town Centre	0.0%	£0.00	0.5%	£0.01	0.0%	£0.00	0.0%	£0.00	0.1%	£0.01
Other, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Total Southport Town Centre	0.0%	£0.00	0.5%	£0.01	0.0%	£0.00	0.0%	£0.00	0.1%	£0.01
Aldi, Meols Cop Road, Southport	2.5%	£0.02	2.5%	£0.03	0.0%	£0.00	0.0%	£0.00	0.4%	£0.05
Other, Sefton	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	1.0%	£0.07	0.6%	£0.07
Sub Total (Sefton)	2.5%	£0.02	3.0%	£0.04	0.0%	£0.00	1.0%	£0.07	1.0%	£0.13
Outside Study Area, Wigan										
Wigan Town Centre	0.0%	£0.00	0.0%	£0.00	5.0%	£0.15	2.5%	£0.18	2.8%	£0.34
Asda Supercentre, Soho Street, Robin Park, Wigan	0.0%	£0.00	0.0%	£0.00	5.0%	£0.15	2.5%	£0.18	2.8%	£0.34
Aldi, Preston Road, Standish	0.0%	£0.00	0.5%	£0.01	20.0%	£0.62	1.0%	£0.07	5.7%	£0.70
Other, Wigan	0.0%	£0.00	0.0%	£0.00	5.0%	£0.15	7.5%	£0.55	5.8%	£0.71
Sub Total (Wigan)	0.0%	£0.00	0.5%	£0.01	35.0%	£1.08	13.5%	£1.00	16.9%	£2.08
Outside Study Area, South Ribble										
Leyland Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	1.0%	£0.07	0.6%	£0.07
Other, South Ribble	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (South Ribble)	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	1.0%	£0.07	0.6%	£0.07
Outside Study Area, Other										
Sub Total (Other)	2.5%	£0.02	2.5%	£0.03	1.0%	£0.03	1.0%	£0.07	1.2%	£0.15
SUB-TOTAL OUTSIDE STUDY AREA	5.0%	£0.03	6.0%	£0.07	36.0%	£1.11	16.5%	£1.22	19.8%	£2.43
TOTAL	100.0%	£0.62	100.0%	£1.23	100.0%	£3.08	100.0%	£7.38	100.0%	£12.31

Notes:

- a. Zones based on the same post code sectors as outlined for Zones 1, 2a, 2b, 3a and 3b of the West Lancashire Retail and Leisure Study (2018)
- b. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones
- c. Study Zone 1 is not featured as no trade is anticipated to be drawn from this zone to the proposed development
- d. Trade allocation of the proposal based on existing shopping patterns and geographic location of existing provision (as identified by the West Lancashire Retail and Leisure Study 2018)
- e. Convenience goods turnover of scheme for 2024 sourced from Table 1 (Proposed Retail Development).
- f. Turnover of proposed Aldi has been reduced by 2.5% to allow for inflow expenditure from beyond the catchment area (in line with West Lancashire Retail and Leisure Study 2018)

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 7(a): PROPOSED INGRAM / SOUTHWAY TOWN CENTRE REDEVELOPMENT SCHEME - CONVENIENCE GOODS TRADE DRAW (2024)

DESTINATION	2a (Buffer)	2b (Buffer)	3a (PCA)	3b (PCA)	TOTAL
Trade Drawn From Zones (%)	5.0%	10.0%	25.0%	60.0%	100.0%
Trade Drawn From Zones (£)	£0.61	£1.22	£3.05	£7.32	£12.20

TABLE 7(b): PROPOSED INGRAM / SOUTHWAY TOWN CENTRE REDEVELOPMENT SCHEME - CONVENIENCE GOODS TRADE ALLOCATION (2024)

DESTINATION	2a (Buffer)		2b (Buffer)		3a (PSA)		3b (PSA)		Total	
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)
Zone 1										
Tesco, Meols Cop, Southport	1.0%	£0.01	2.5%	£0.03	1.0%	£0.03	1.0%	£0.07	1.2%	£0.14
Booths, Station Road, Hesketh Bank Village Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Tarleton Village Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Zone 1	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Zone 1)	1.0%	£0.01	2.5%	£0.03	1.0%	£0.03	1.0%	£0.07	1.2%	£0.14
Zone 2a										
Tesco, Liverpool Road North, Burscough Town Centre	25.0%	£0.15	2.5%	£0.03	7.5%	£0.23	1.0%	£0.07	4.0%	£0.48
Other, Burscough Town Centre	7.5%	£0.05	1.0%	£0.01	1.0%	£0.03	0.5%	£0.04	1.0%	£0.13
Total Burscough Town Centre	32.5%	£0.20	3.5%	£0.04	8.5%	£0.26	1.5%	£0.11	5.0%	£0.61
Aldi, Ringtail Retail Park, Burscough	35.0%	£0.21	15.0%	£0.18	10.0%	£0.30	7.5%	£0.55	10.3%	£1.25
Booths, Ringtail Retail Park Burscough	2.5%	£0.02	2.5%	£0.03	2.5%	£0.08	0.5%	£0.04	1.3%	£0.16
Other, Zone 2a	1.0%	£0.01	0.5%	£0.01	0.0%	£0.00	0.0%	£0.00	0.1%	£0.01
Sub Total (Zone 2a)	71.0%	£0.43	21.5%	£0.26	21.0%	£0.64	9.5%	£0.70	16.7%	£2.03
Zone 2b										
Morrisons, Park Road, Ormskirk Town Centre	7.5%	£0.05	30.0%	£0.37	1.0%	£0.03	5.0%	£0.37	6.6%	£0.81
Aldi, Two Saints Place, Ormskirk Town Centre	2.5%	£0.02	12.5%	£0.15	1.0%	£0.03	5.0%	£0.37	4.6%	£0.56
M&S Foodhall, Aughton Street, Ormskirk Town Centre	0.0%	£0.00	2.5%	£0.03	0.0%	£0.00	1.0%	£0.07	0.9%	£0.10
Other, Ormskirk Town Centre	2.5%	£0.02	12.5%	£0.15	2.5%	£0.08	2.5%	£0.18	3.5%	£0.43
Total Ormskirk Town Centre	12.5%	£0.08	57.5%	£0.70	4.5%	£0.14	13.5%	£0.99	15.6%	£1.90
Other, Zone 2b	0.5%	£0.00	2.5%	£0.03	0.0%	£0.00	1.0%	£0.07	0.9%	£0.11
Sub Total (Zone 2b)	13.0%	£0.08	60.0%	£0.73	4.5%	£0.14	14.5%	£1.06	16.5%	£2.01
Zone 3a										
Co op Food, Ormskirk Road, Up Holland Village Centre	0.0%	£0.00	0.0%	£0.00	2.5%	£0.08	0.5%	£0.04	0.9%	£0.11
Other, Zone 3a	0.0%	£0.00	0.0%	£0.00	2.5%	£0.08	0.5%	£0.04	0.9%	£0.11
Sub Total (Zone 3a)	0.0%	£0.00	0.0%	£0.00	5.0%	£0.15	1.0%	£0.07	1.9%	£0.23
Zone 3b										
Asda, Ingram Road, Skelmersdale Town Centre	7.5%	£0.05	7.5%	£0.09	17.5%	£0.53	35.0%	£2.56	26.5%	£3.23
Iceland, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	1.0%	£0.03	2.5%	£0.18	1.8%	£0.21
Other, Skelmersdale Town Centre	0.0%	£0.00	0.5%	£0.01	2.5%	£0.08	7.5%	£0.55	5.2%	£0.63
Ingram / Southway (Lidl), Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Total Skelmersdale Town Centre	7.5%	£0.05	8.0%	£0.10	21.0%	£0.64	45.0%	£3.29	33.4%	£4.08
Other, Zone 3b	0.0%	£0.00	1.0%	£0.01	1.0%	£0.03	2.5%	£0.18	1.9%	£0.23
Aldi, High Street, Skelmersdale	2.5%	£0.02	1.0%	£0.01	10.0%	£0.30	10.0%	£0.73	8.7%	£1.06
Sub Total (Zone 3b)	10.0%	£0.06	10.0%	£0.12	32.0%	£0.98	57.5%	£4.21	44.0%	£5.37
SUB-TOTAL STUDY AREA	95.0%	£0.58	94.0%	£1.15	63.5%	£1.94	83.5%	£6.11	80.1%	£9.77
OUTSIDE STUDY AREA										
Outside Study Area, Sefton										
Morrisons, Winter Gardens, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Asda, Central Twelve Shopping Park, Southport TC	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sainsbury's, St Georges Place, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Lidl, Virginia Street, Southport Town Centre	0.0%	£0.00	0.5%	£0.01	0.0%	£0.00	0.0%	£0.00	0.1%	£0.01
Other, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Total Southport Town Centre	0.0%	£0.00	0.5%	£0.01	0.0%	£0.00	0.0%	£0.00	0.1%	£0.01
Aldi, Meols Cop Road, Southport	2.5%	£0.02	2.5%	£0.03	0.0%	£0.00	0.0%	£0.00	0.4%	£0.05
Other, Sefton	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	1.0%	£0.07	0.6%	£0.07
Sub Total (Sefton)	2.5%	£0.02	3.0%	£0.04	0.0%	£0.00	1.0%	£0.07	1.0%	£0.13
Outside Study Area, Wigan										
Wigan Town Centre	0.0%	£0.00	0.0%	£0.00	5.0%	£0.15	2.5%	£0.18	2.8%	£0.34
Asda Supercentre, Soho Street, Robin Park, Wigan	0.0%	£0.00	0.0%	£0.00	5.0%	£0.15	2.5%	£0.18	2.8%	£0.34
Aldi, Preston Road, Standish	0.0%	£0.00	0.5%	£0.01	20.0%	£0.61	1.0%	£0.07	5.7%	£0.69
Other, Wigan	0.0%	£0.00	0.0%	£0.00	5.0%	£0.15	7.5%	£0.55	5.8%	£0.70
Sub Total (Wigan)	0.0%	£0.00	0.5%	£0.01	35.0%	£1.07	13.5%	£0.99	16.9%	£2.06
Outside Study Area, South Ribble										
Leyland Town Centre	0.0%	£0.00	0.0%	£0.00	0.5%	£0.02	1.0%	£0.07	0.7%	£0.09
Other, South Ribble	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (South Ribble)	0.0%	£0.00	0.0%	£0.00	0.5%	£0.02	1.0%	£0.07	0.7%	£0.09
Outside Study Area, Other										
Sub Total (Other)	2.5%	£0.02	2.5%	£0.03	1.0%	£0.03	1.0%	£0.07	1.2%	£0.15
SUB-TOTAL OUTSIDE STUDY AREA	5.0%	£0.03	6.0%	£0.07	36.5%	£1.11	16.5%	£1.21	19.9%	£2.42
TOTAL	100.0%	£0.61	100.0%	£1.22	100.0%	£3.05	100.0%	£7.32	100.0%	£12.20

Notes:

- a. Zones based on the same post code sectors as outlined for Zones 1, 2a, 2b, 3a and 3b of the West Lancashire Retail and Leisure Study (2018)
- b. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones
- c. Study Zone 1 is not featured as no trade is anticipated to be drawn from this zone to the proposed development
- d. Trade allocation of the proposal based on existing shopping patterns and geographic location of existing provision (as identified by the West Lancashire Retail and Leisure Study 2018)
- e. Convenience goods turnover of scheme for 2024 sourced from Table 5 (Committed Developments and Turnover).
- f. Turnover of proposed town centre development has been reduced by 2.5% to allow for inflow expenditure from beyond the catchment area (in line with West Lancashire Retail and Leisure Study 2018)

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 8(a) REMAINING COMMITMENTS - CONVENIENCE GOODS TURNOVER (2024)

DESTINATION	Zone 2a	Zone 2b	Zone 2b	TOTAL
	Yew Tree Farm, Burscough	Ropers Arms, Wigan Road, Ormskirk	Briars Lane Garage, Ormskirk	
Total Convenience Goods Turnover (£m)	£2.33	£2.19	£1.28	£5.80

TABLE 8(b) REMAINING COMMITMENTS - CONVENIENCE GOODS TRADE ALLOCATION (2024)

DESTINATION	Yew Tree Farm, Burscough		Ropers Arms, Wigan Road, Ormskirk		Briars Lane Garage, Ormskirk		TOTAL	
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)
Zone 1								
Tesco, Meols Cop, Southport	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Booths, Station Road, Hesketh Bank Village Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Tarleton Village Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Zone 1	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Zone 1)	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Zone 2a								
Tesco, Liverpool Road North, Burscough Town Centre	27.5%	£0.64	1.0%	£0.02	1.0%	£0.01	11.6%	£0.68
Other, Burscough Town Centre	7.5%	£0.17	0.5%	£0.01	0.5%	£0.01	3.3%	£0.19
Total Burscough Town Centre	35.0%	£0.82	1.5%	£0.03	1.5%	£0.02	15.0%	£0.87
Aldi, Ringtail Retail Park, Burscough	25.0%	£0.58	2.5%	£0.05	2.5%	£0.03	11.5%	£0.67
Booths, Ringtail Retail Park Burscough	20.0%	£0.47	2.5%	£0.05	2.5%	£0.03	9.5%	£0.55
Other, Zone 2a	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Zone 2a)	80.0%	£1.86	6.5%	£0.14	6.5%	£0.08	36.0%	£2.09
Zone 2b								
Morrisons, Park Road, Ormskirk Town Centre	5.0%	£0.12	40.0%	£0.88	40.0%	£0.51	25.9%	£1.50
Aldi, Two Saints Place, Ormskirk Town Centre	2.5%	£0.06	17.5%	£0.38	17.5%	£0.22	11.5%	£0.67
M&S Foodhall, Aughton Street, Ormskirk Town Centre	2.5%	£0.06	10.0%	£0.22	10.0%	£0.13	7.0%	£0.41
Other, Ormskirk Town Centre	5.0%	£0.12	20.0%	£0.44	20.0%	£0.26	14.0%	£0.81
Total Ormskirk Town Centre	15.0%	£0.35	87.5%	£1.92	87.5%	£1.12	58.4%	£3.39
Other, Zone 2b	0.0%	£0.00	1.0%	£0.02	1.0%	£0.01	0.6%	£0.03
Sub Total (Zone 2b)	15.0%	£0.35	88.5%	£1.94	88.5%	£1.13	59.0%	£3.42
Zone 3a								
Co op Food, Ormskirk Road, Up Holland Village Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Zone 3a	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Zone 3a)	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Zone 3b								
Asda, Ingram Road, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Iceland, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Ingram / Southway (Lidl), Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Total Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Zone 3b	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Aldi, High Street, Skelmersdale	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Zone 3b)	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
SUB-TOTAL STUDY AREA	95.0%	£2.21	95.0%	£2.08	95.0%	£1.22	95.0%	£5.51
OUTSIDE STUDY AREA								
Outside Study Area, Sefton								
Morrisons, Winter Gardens, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Asda, Central Twelve Shopping Park, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sainsbury's, St Georges Place, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Lidl, Virginia Street, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Total Southport Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Aldi, Meols Cop Road, Southport	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Sefton	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Sefton)	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Outside Study Area, Wigan								
Wigan Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Asda Supercentre, Soho Street, Robin Park, Wigan	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Aldi, Preston Road, Standish	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, Wigan	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Wigan)	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Outside Study Area, South Ribble								
Leyland Town Centre	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Other, South Ribble	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (South Ribble)	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Outside Study Area, Other								
Sub Total (Other)	5.0%	£0.12	5.0%	£0.11	5.0%	£0.06	5.0%	£0.29
SUB-TOTAL OUTSIDE STUDY AREA	5.0%	£0.12	5.0%	£0.11	5.0%	£0.06	5.0%	£0.29
TOTAL	100.0%	£2.33	100.0%	£2.19	100.0%	£1.28	100.0%	£5.80

Notes:

- Zones based on the same post code sectors as outlined for Zones 1, 2a, 2b, 3a and 3b of the West Lancashire Retail and Leisure Study (2018)
- Trade allocation of the proposal based on existing shopping patterns and geographic location of existing provision (as identified by the West Lancashire Retail and Leisure Study 2018)
- Convenience goods turnover of other commitments for 2024 sourced from Table 5 (Committed Developments and Turnover)
- Turnover of other commitments has been reduced by 2.5% to allow for inflow expenditure from beyond the catchment area (in line with West Lancashire Retail and Leisure Study 2018)

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 10(a): EXPLANATION OF RE-ALLOCATION OF ALDI, CONCOURSE SHOPPING CENTRE TRADE FOLLOWING CLOSURE

DESTINATION	Total Convenience Turnover (2019) (Pre-Aldi closure) (Inclusive of inflow 2.5%)	Total Convenience Turnover (2024) (Pre-Aldi closure) (Inclusive of inflow 2.5%)	Proportional Re-Allocation of Trade Following closure		Total Convenience Turnover (2024) (Post-Aldi closure but pre cumulative impact)
			(%)	(£m)	
Zone 3b					
Asda, Ingram Road, Skelmersdale Town Centre	£42.04	£42.29	69.2%	£6.71	£49.00
Aldi, Concourse Centre, Skelmersdale Town Centre	£9.63	£9.69	-	-	-
Iceland, Concourse Centre, Skelmersdale Town Centre	£3.21	£3.23	5.3%	£0.51	£3.74
Other, Skelmersdale Town Centre	£10.22	£10.28	16.8%	£1.63	£11.91
Ingram / Southway (Lidl), Skelmersdale Town Centre	-	-	-	-	-
Total Skelmersdale Town Centre	£65.10	£65.50	-	£8.85	£64.66
Other, Zone 3b	£5.25	£5.29	8.7%	£0.84	£6.13
Aldi, High Street, Skelmersdale	-	-	-	-	-
Sub Total (Zone 3b)	£70.35	£70.78	100.0%	£9.69	£70.78

TABLE 10(b): ASSESSMENT OF SKELMERSDALE TOWN CENTRE TURNOVER BETWEEN 2019 AND 2024 (PRE AND POST DEVELOPMENT)

DESTINATION	Aldi Foodstore Diversion		Ingram / Southway Diversion		Other Commitments Diversion		Cumulative Impact (2024) (£m)	Cumulative Impact (2024) (%)
	(£m)	(%)	(£m)	(%)	(£m)	(%)		
Zone 3b								
Asda, Ingram Road, Skelmersdale Town Centre	£3.52	-7.2%	£3.23	-6.6%	£0.00	0.0%	£6.75	-13.8%
Aldi, Concourse Centre, Skelmersdale Town Centre	-	-	-	-	-	-	-	-
Iceland, Concourse Centre, Skelmersdale Town Centre	£0.18	-4.9%	£0.21	-5.7%	£0.00	0.0%	£0.40	-10.6%
Other, Skelmersdale Town Centre	£0.45	-3.8%	£0.63	-5.3%	£0.00	0.0%	£1.08	-9.1%
Ingram / Southway (Lidl), Skelmersdale Town Centre	£1.07	-8.6%	£0.00	0.0%	£0.00	0.0%	£1.07	-8.6%
Total Skelmersdale Town Centre	£5.23	-8.1%	£4.08	-6.3%	£0.00	0.0%	£9.31	-14.4%
Other, Zone 3b	£0.27	-4.5%	£0.23	-3.7%	£0.00	0.0%	£0.50	-8.2%
Aldi, High Street, Skelmersdale	£0.00	0.0%	£1.06	-8.4%	£0.00	0.0%	£1.06	-8.4%
Sub Total (Zone 3b)	£5.51	-7.8%	£5.37	-7.6%	£0.00	0.0%	£10.87	-15.4%

Total Convenience Turnover (2024) (Post Aldi Closure and Post Impact)	Actual Change in Convenience Turnover (2019 - 2024)	
	(£m)	(%)
£42.25	+ £0.21	+ 0.5%
-	-£9.63	-100.0%
£3.35	+ £0.13	+ 4.2%
£10.83	+ £0.61	+ 6.0%
£11.44	+ £11.44	+ 91.42%
£67.86	+ £2.76	+ 4.2%
£5.63	+ £0.37	+ 7.1%
£11.56	+ £11.56	+ 91.57%
£85.04	+ £14.69	+ 20.9%

Notes:

- Turnover of proposed retail development and commitments taken from Tables 1 and 5 and allows for changes in turnover efficiency based on Figure 4a (Page 14) of Experian Retail Planner Briefing Note 16, December 2018.
- 'Inflow Expenditure to Study Area' represents the expenditure flowing to the identified centre / facility from outside the retail study area. 2.5% assumption is based on West Lancashire Retail and Leisure Study 2018
- 'Total Convenience Turnover (2024)' = 'Study Area Derived Turnover' + 'Inflow Expenditure'
- 'Total Convenience Turnover (2024) Post-Aldi Closure' proportionally re-allocates the turnover of 'Aldi, Concourse Centre' across the other facilities in Skelmersdale town centre
- Impact based on proportional change in turnover expressed as a percentage. Percentage impact tested upon the total turnovers of centres and other retail destinations (i.e. inclusive of inflow), as oppose to purely study area derived total
- Actual change in turnover represents the difference between the 2019 position (i.e. before Aldi's closure and commitments) and the 2024 position (i.e. after Aldi's closure and commitments)

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 11(a): POPULATION WITHIN EACH ZONE OF CATCHMENT AREA

ZONE	POPULATION												
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1 (Buffer)		28,480	28,519	28,540	28,595	28,659	28,705	28,765	28,809	28,854	28,905	28,964	28,999
2a (Buffer)		13,201	13,222	13,231	13,251	13,257	13,270	13,282	13,305	13,305	13,332	13,353	13,379
2b (Buffer)		33,103	33,099	33,130	33,131	33,128	33,162	33,182	33,232	33,267	33,288	33,296	33,313
3a (PSA)		16,847	16,882	16,930	16,971	17,021	17,063	17,129	17,175	17,212	17,240	17,272	17,295
3b (PSA)		37,355	37,476	37,548	37,643	37,754	37,873	37,996	38,102	38,239	38,381	38,535	38,684
TOTAL		128,986	129,198	129,379	129,591	129,819	130,073	130,354	130,623	130,877	131,146	131,420	131,670

Notes:

- Zones based on the same post code sectors as outlined for Zones 1, 2a, 2b, 3a and 3b of the West Lancashire Retail and Leisure Study (2018)
- Population derived from Experian Location Analyst data (23 September 2019 Report)
- Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones.

TABLE 11(b): PER CAPITA COMPARISON EXPENDITURE WITHIN EACH ZONE OF CATCHMENT AREA (EXCLUDING NON STORE RETAIL TRADE DEDUCTION)

ZONE	COMPARISON GOODS EXPENDITURE PER HEAD (EXCLUDING NSRT DEDUCTION)												
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1 (Buffer)	£3,766	£3,871	£3,972	£4,083	£4,214	£4,349	£4,501	£4,650	£4,798	£4,957	£5,115	£5,274	£5,443
2a (Buffer)	£3,846	£3,954	£4,056	£4,170	£4,304	£4,441	£4,597	£4,748	£4,900	£5,062	£5,224	£5,386	£5,558
2b (Buffer)	£4,325	£4,446	£4,562	£4,689	£4,839	£4,994	£5,169	£5,340	£5,511	£5,692	£5,875	£6,057	£6,251
3a (PSA)	£4,211	£4,329	£4,441	£4,566	£4,712	£4,863	£5,033	£5,199	£5,365	£5,542	£5,720	£5,897	£6,086
3b (PSA)	£2,548	£2,619	£2,687	£2,763	£2,851	£2,942	£3,045	£3,146	£3,246	£3,354	£3,461	£3,568	£3,682
ANNUAL GROWTH		2.8%	2.6%	2.8%	3.2%	3.2%	3.5%	3.3%	3.2%	3.3%	3.2%	3.1%	3.2%

Notes:

- Per capita expenditure derived from Experian Location Analyst data (23 September 2019 Report)
- Per capita expenditure projected forward using forecast growth rates taken from Figure 6, Appendix 3 of Experian Retail Planner Briefing Note 16 (December 2018)

2017 Prices

TABLE 11(c): PER CAPITA COMPARISON EXPENDITURE WITHIN EACH ZONE OF CATCHMENT AREA (INCLUDING NON STORE RETAIL TRADE DEDUCTION)

ZONE	COMPARISON GOODS EXPENDITURE PER HEAD (INCLUDING NSRT DEDUCTION)												
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1 (Buffer)	£3,182	£3,213	£3,261	£3,324	£3,405	£3,492	£3,596	£3,701	£3,805	£3,921	£4,036	£4,151	£4,278
2a (Buffer)	£3,250	£3,282	£3,330	£3,394	£3,477	£3,566	£3,673	£3,780	£3,886	£4,004	£4,122	£4,239	£4,369
2b (Buffer)	£3,655	£3,690	£3,745	£3,817	£3,910	£4,010	£4,130	£4,250	£4,370	£4,503	£4,635	£4,767	£4,913
3a (PSA)	£3,558	£3,593	£3,646	£3,717	£3,807	£3,905	£4,021	£4,138	£4,255	£4,384	£4,513	£4,641	£4,783
3b (PSA)	£2,153	£2,174	£2,206	£2,249	£2,304	£2,363	£2,433	£2,504	£2,574	£2,653	£2,731	£2,808	£2,894
ANNUAL DEDUCTION	15.5%	17.0%	17.9%	18.6%	19.2%	19.7%	20.1%	20.4%	20.7%	20.9%	21.1%	21.3%	21.4%

Notes:

- Per capita expenditure derived from Experian Location Analyst data (September 2019 Report)
- Expenditure excludes Non Store Retail Trade in line with 'adjusted' allowance derived from Figure 5, Appendix 3 of Experian Retail Planner Briefing Note 15 (December 2018)

2017 Prices

TABLE 11(d): TOTAL COMPARISON GOODS EXPENDITURE WITHIN CATCHMENT AREA

ZONE	TOTAL COMPARISON GOODS EXPENDITURE												
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
1 (Buffer)		£91.51	£93.00	£94.86	£97.36	£100.08	£103.23	£106.46	£109.62	£113.13	£116.66	£120.22	£124.06
2a (Buffer)		£43.32	£44.03	£44.91	£46.08	£47.28	£48.74	£50.20	£51.70	£53.27	£54.95	£56.60	£58.45
2b (Buffer)		£122.16	£123.96	£126.46	£129.55	£132.86	£136.96	£141.04	£145.22	£149.79	£154.29	£158.71	£163.66
3a (PSA)		£60.53	£61.56	£62.92	£64.61	£66.46	£68.62	£70.89	£73.07	£75.46	£77.80	£80.16	£82.73
3b (PSA)		£81.21	£82.69	£84.44	£86.72	£89.20	£92.15	£95.14	£98.09	£101.44	£104.81	£108.21	£111.97
TOTAL		£398.74	£405.24	£413.60	£424.32	£435.88	£449.70	£463.73	£477.71	£493.09	£508.51	£523.90	£540.87

Notes:

- Total available expenditure calculated by multiplying population from Table 11(a) by expenditure per head (minus NSRT deduction) from Table 11(c)

2017 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 12: COMPARISON GOODS IMPACT ANALYSIS

Scheme Comparison Goods Turnover (£m) (2024)		£3.08	
Catchment Area	Available Expenditure / Growth (£m)	Representative Proportion of Scheme's Turnover (%)	
Study Area Total Comparison Expenditure (£m) (2024)	£463.73	0.66%	
Study Area Total Comparison Exp Growth (£m) (2019 - 2024)	£58.49	5.27%	
Primary Catchment Area Total Comparison Expenditure (£m) (2024)	£166.03	1.86%	
Primary Catchment Area Total Comparison Exp Growth (£m) (2019 - 2024)	£21.79	14.15%	
Skelmersdale Impact - Current Market Share		(%)	(£m)
Skelmersdale Retail Facilities Market Share of Study Area Expenditure		7.10%	£32.92
Inflow Allowance from Beyond Study Area (@2.5% of Study Area Draw)		2.50%	£0.82
Total Turnover (Inclusive of Inflow)		-	£33.75
Trade Diversion from Skelmersdale Facilities to Aldi		50.00%	£1.54
Consequential Retail Impact (2024)		-	4.6%
Skelmersdale Impact - Allowance for Committed Ingram / Southway Scheme		(%)	(£m)
Skelmersdale Retail Facilities Market Share of Study Area Expenditure		10.00%	£46.37
Inflow Allowance from Beyond Study Area (@2.5% of Study Area Draw)		2.50%	£1.16
Total Turnover (Inclusive of Inflow)		-	£47.53
Trade Diversion from Skelmersdale Facilities to Aldi		50.00%	£1.54
Consequential Retail Impact (2024)		-	3.2%
Skelmersdale Impact - Allowance for Committed Ingram / Southway Scheme		(%)	(£m)
Skelmersdale Retail Facilities Market Share of Study Area Expenditure		15.00%	£69.56
Inflow Allowance from Beyond Study Area (@2.5% of Study Area Draw)		2.50%	£1.74
Total Turnover (Inclusive of Inflow)		-	£71.30
Trade Diversion from Skelmersdale Facilities to Aldi		50.00%	£1.54
Consequential Retail Impact (2024)		-	2.2%

Notes

- Turnover of proposal from Table 1 and allows for changes in turnover efficiency based on Figure 4b (Page 14) of Experian Retail Planner Briefing Note 16, December 2018
- Available expenditure and growth derived from Table 11
- 'Skelmersdale Retail Facilities Market Share of Study Area Expenditure' taken from the West Lancashire Retail and Leisure Study 2018
- 'Inflow Allowance' is expenditure flowing to the identified centre / facility from outside the retail study area. 2.5% assumed based on West Lancashire Retail and Leisure Study 2018
- Changes in market share as a consequence of the Ingram / Southway scheme based on the anticipated uplift in town centre turnover set out in the Planning and Retail Statement prepared in support of Planning Application Ref. 2018/0898/FUL (Approved Sept 2019)

2017 Prices

Appendix V

Retail Impact Assessment Methodology

Appendix V

Retail Impact Assessment Methodology

Methodology / Data Input	Approach / Data Source
<i>Population and Expenditure</i>	
Price Base	2017 prices.
Population and Expenditure Base Data Source	Base population and pre-capita expenditure figures derived from Experian Location Analyst report (23 rd September 2019).
Population Growth Assumptions	Population growth assumptions taken from Experian Location Analyst report (23 rd September 2019).
Convenience and Comparison Goods Expenditure Growth Assumptions	Experian forecast convenience and comparison goods growth rates, taken from Figure 6, Appendix 3 of Experian Retail Planner Briefing Note 16 (Dec 2018).
Non-Store Retail Trade / Special Forms of Trading	Year-on-year NSRT deduction taken from Figure 5, Appendix 3 of the Experian Retail Planner Briefing Note 16 (Dec 2018).
<i>Study Area and Shopping Patterns</i>	
Impact Assessment Area of Study	Primary Catchment Area comprises Zones 3a and 3b of the West Lancashire Retail and Leisure Study (June 2018). Zones 1, 2a and 2b of the West Lancashire Retail and Leisure Study represent buffer zones, which have been used for the purposes of understanding shopping patterns in the wider West Lancashire area.
Household Shopper Survey Base Data	The same household telephone shopper survey data has been drawn upon as that which informed the West Lancashire Retail and Leisure Study (June 2018) – survey dated July 2017.
Food and Non-Food Shopping Patterns	For consistency with the West Lancashire Retail and Leisure Study (June 2018), we have utilised the food and non-food shopping patterns outlined in Spreadsheet 5 of both the convenience and comparison goods quantitative need assessments (see Appendices D and E of the West Lancashire Retail and Leisure Study (June 2018)).
<i>Floorspace, Sales Densities, and Turnover</i>	
Planning Application Scheme Floorspace	Gross floorspace sourced from architectural drawings. Net sales area and convenience goods / comparison goods floorspace split of Aldi provided by operator. Net sales area and convenience goods / comparison goods floorspace split of additional 'flexible use' unit is an assumption by Avison Young. This is considered particularly robust as all floorspace is assumed as Class A1, even though some could be Use Class A2 or A3.
Benchmark Convenience and Comparison Goods Sales Densities for Scheme and Commitments	Convenience and comparison goods sales densities derived from GlobalData (formally Verdict) for Aldi. Sales density for additional 'flexible use' unit is an Avison Young assumption.

Changes in Retail Sales Densities	Allowance for future changes in retail sales densities taken from Figures 4a and 4b (Page 14) of Experian's Retail Planner Briefing Note 16, December 2018 for both food and non-food retail floorspace.
Committed Retail Floorspace	<p>Commitments and their floorspaces have been taken from the West Lancashire Retail and Leisure Study (2018). The sales densities for Yew Tree Farm, Ropers Arms, and Briars Lane Garage are also taken from the West Lancashire Retail and Leisure Study (2018).</p> <p>The floorspace and sales density for the Ingram / Southway town centre redevelopment scheme in Skelmersdale is derived from the retail impact assessment prepared in support of application Ref. 2018/0898/FUL (Approved Sept 2019).</p>
Retail Impact Assumptions	
Impact Assessment Base Year	2019
Impact Assessment Test Years	2024 (five years as defined by the Planning Practice Guidance).
Inflow Expenditure Allowance (Proposed Development)	Expenditure from beyond the catchment flowing to the proposed retail development has been allowed for by reducing the overall scheme turnover by 2.5% as part of the trade allocation and trading impact tables.
Inflow Expenditure Allowance (Existing Facilities and Centres)	Expenditure from beyond the catchment flowing to existing centres and stand-alone facilities has been allowed for in establishing the 'Total Turnover' of these destinations. 'Inflow Expenditure to Study Area' represents the expenditure flowing to the identified centre / facility from outside the retail study area. 2.5% assumption is based on West Lancashire Retail and Leisure Study 2018.
Closure of Aldi Foodstore and Re-Allocation of Trade	In order to account for the impending closure of Aldi at the Concourse Shopping Centre in Skelmersdale town centre, we have proportionally re-allocated its convenience goods turnover across the other in and out-of-centre stores in Skelmersdale. This re-allocation is based on the existing draw of these facilities from the study area that informs the West Lancashire Retail Study (2018).
Approach to Trade Diversion	Anticipated trade diversion of the proposal and commitments based on existing shopping patterns and geographic location of existing and proposed provision (as identified by the West Lancashire Retail and Leisure Study (June 2018)).
Definition of Impact	Impact based on the proportional change in turnover expressed as a percentage. Percentage impact is tested on the total turnover of centres and other retail destinations (informed by evidence), as oppose to just turnover from catchment.

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