



Planning and Retail Statement

Land at Westgate and High Street, Skelmersdale

November 2021

Contents

1.	Introduction	3
2.	Site Description	6
3.	The Proposed Development	11
4.	Aldi Stores Limited	19
5.	Planning Policy Context	27
6.	The Sequential Test	36
7.	The Retail Impact Test.....	47
8.	Other Planning Policy Matters	73
9.	Summary and Conclusions.....	82

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
Appendix VI	Health Check Assessments

Report title: Planning and Retail Statement

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For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 This Planning and Retail 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 foodstore (Use Class E) and trade counter (Use Class B8) with associated access, car parking, servicing and hard and soft landscaping"

1.2 The application site extends to approximately 1.16ha and is situated in a relatively prominent location at the corner of High Street and Westgate in Skelmersdale. It was until recently occupied by a 1960's office building until its enforced demolition in 2021 following an arson attack. The office building was vacant at the time of its demolition and had been since 2016, following the departure of its long-term tenant the Co-operative Group ('The Co-op'). The building had fallen into disrepair in the years following the Co-op's departure after efforts to find an alternative office occupier failed and it became an ongoing target for vandalism, break-ins and anti-social behaviour.

1.3 Today the site continues to offer a poor impression of the area, it is largely hoarded off from the public and comprises only the building slab and unmanaged self-seeded vegetation. 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 important site, whilst also creating 40 to 50 full and part-time jobs and enhancing consumer choice within western Skelmersdale – where there currently is no 'main' food shopping destination. The scheme will also facilitate the delivery of a trade counter use (Use Class B8) on a site which is allocated for employment purposes in the Local Plan. This trade counter will create a further 10 to 15 local jobs.

1.4 The rationale for Aldi submitting this planning application is that the retailer cannot adequately serve Skelmersdale (a sizable town of some 40,000 people) from their existing store within the Concourse Shopping Centre in Skelmersdale town centre. This is both due to the store's limited size (which has a sales area one third less than Aldi's current foodstore format) and inherent operational constraints associated with the Concourse Centre itself. These include there being no dedicated surface level car parking within easy reach of customers using trolleys – critical for those undertaking a 'bulk' food shopping trip – and reduced operational hours, dictated by the trading hours of the shopping centre.

1.5 Accordingly, Aldi's objective is to bring their latest discount foodstore format to Skelmersdale so that they can better meet the needs of Skelmersdale residents from a store which is capable of providing Aldi's full food offer. However, they are also proposing to retain their Concourse Centre store (where the current lease runs until the end of 2025), so that there would be no consequential reduction in consumer choice and competition within the town centre should a new Aldi store open at Westgate.

- 1.6 It is important to highlight that the location Aldi has selected for its new 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 17 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 fully 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.
- 1.7 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.
- 1.8 This Planning and Retail Statement should be read in conjunction with the schedule of supporting technical documents, plans and drawings provided at **Appendix 1**.
- 1.9 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.

1.10 This statement is also supported by the following 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
- Appendix VI – Health Check Assessments

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 Local 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 and Features

- 2.4 The site is irregular in shape and extends to approximately 1.16 ha. Until relatively recently it was 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. In the years that followed the building fell into disrepair after efforts to find an alternative office occupier failed. The site unfortunately became a target for repeated vandalism, break-ins and anti-social behaviour, which ultimately led to an arson attack in September 2020 that destroyed much of the building. The building's owner (The Co-operative Group) took the decision to demolish the offices in late 2020, given that it had become structurally unsound and dangerous.
- 2.5 The site today continues to offer a poor impression of the area. It is largely hoarded off from the public and comprises only the building slab, its former car park, and unmanaged self-seeded vegetation. The land is clearly ripe for redevelopment.
- 2.6 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 a landscaping strip on its western boundary but otherwise comprises built form or 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.
- 2.7 In summary, the application site extends to approximately 1.16ha and comprises brownfield land in the form of the slab and disused car park of a now demolished 1960's pre-fabricated office building. 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 social, environmental and economic improvements by replacing a vacant and underused site with a high-quality modern foodstore, trade counter unit 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

- 2.8 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, gyms, manufacturing, etc.). Indeed, a full list of the uses identified at the existing Westgate Employment area (based on an audit from November 2021) is set out below:

Building Use	Use Class
Central Heating Supplies	Class E(a) Display or retail sale of goods
Pet Supplies	Class E(a) Display or retail sale of goods
Flooring Supplies	Class E(a) Display or retail sale of goods
Sandwich Shop	Class E(a) Display or retail sale of goods
Dog Grooming Parlour	Class E(c)(ii) Professional services
Salon	Class E(c)(ii) Professional services
Beautician	Class E(c)(ii) Professional services
Salon	Class E(c)(ii) Professional services
Gym / Trainer	Class E(d) Indoor sport, recreation or fitness
Soft Play Centre	Class E(d) Indoor sport, recreation or fitness
Gym	Class E(d) Indoor sport, recreation or fitness
Gym	Class E(d) Indoor sport, recreation or fitness
Nursery	Class E(f) Day nursery
Toiletries Manufacturer / Sales	Class E(g) (iii) Light industrial processes
Office	E(g)(i) Offices
Office	E(g)(i) Offices
Print Design	E(g)(i) Offices
Accountant	E(g)(i) Offices
Tyre Servicing Centre	Class B2 General industrial
Metal fabricators	Class B2 General industrial
National Tyres	Class B2 General industrial
Roofing Supplies Business	Class B8 / Class E(a) Display or retail sale of goods
Builders Merchant	Class B8 / Class E(a) Display or retail sale of goods
Music Education Space (inc. Café)	Sui-Generis
Ambulance Station	Sui-Generis

2.9 The audit of existing buildings within the Westgate employment area has established that this is occupied by a wide variety of different uses, including some 60% of the units (of which there are 25 in total) being used for retailing, professional services, leisure and sui-generis purposes. The remaining 40% are used for traditional 'employment land' uses such as trade counters, manufacturing and offices.

- 2.10 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.
- 2.11 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 a 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 some 17 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, grocers, florist, bakery and pharmacy amongst others. The centre is served by large dedicated car parks to its north and south and it is noted that there are three further retail and commercial units just outside the defined centre boundary along Sandy Lane itself, a vehicular highway which runs north from the centre towards Witham Road.
- 2.12 In summary, the application site is surrounded by a combination of commercial, employment, residential, leisure 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. The Westgate employment area adjacent is relatively low-grade and comprises an eclectic mix of uses. It is noted that traditional employment uses do not predominate. Accordingly, the principle of further economic development (retail and a trade counter) 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

- 2.13 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.
- 2.14 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.

- 2.15 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.
- 2.16 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.
- 2.17 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

- 2.18 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.

3. The 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 'discount' format foodstore (Use Class E) and a trade counter unit (Use Class B8) 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.

Specifics of the Development

3.3 The precise nature of the development proposal is set out below. The planning application, seeks 'detailed' planning permission for the following:

- **Unit A** – Erection of a single-storey foodstore ('Use Class E(a)') with a Gross External Area (GEA) of 1,881 sq. m, Gross Internal Area (GIA) of 1,804 sq. m, and a net sales area of 1,315 sq. m;
- **Unit B** – Erection of a single-storey trade counter ('Use Class B8') with a GEA of 407 sq. m and a GIA of 372 sq. m;
- Provision of 140 car parking spaces including 9 accessible spaces and 11 parent and child spaces. There will also be 4 'van spaces' provided adjacent to the proposed trade counter unit;
- Provision of 7 motorcycle parking spaces;
- Of the 140 proposed parking spaces, 4 will also be equipped with Electric Vehicle Charging Points ('EVCP') and belowground infrastructure will be put in place to add a further 20 EVCP's in the future;
- 20 short-stay bicycle parking spaces (10 Sheffield cycle hoops) for customers, and long-stay bicycle parking spaces (located within the store's warehouse) for staff;
- Areas of public realm throughout the site, including the creation of pedestrian walkways into and out of the site from both the northern and western boundaries;
- Soft and hard landscaping works across the site, including new landscaping to improve the aesthetic appearance of the site along its northern, eastern, western and southern boundaries. This planting will include the introduction of 35 new trees and the retention of the majority of the site's existing mature trees;

- Servicing provision (a dock-levelling system) on the eastern side of the proposed foodstore and a dedicated servicing lay-by immediately adjacent to the proposed trade counter unit;
- Provision of an internal vehicular route through the site, with new vehicular access and egress provisions; and,
- The Aldi foodstore will be served by a Deposit Return Scheme ('DRS') unit to encourage recycling. This purpose built structure, immediately adjacent to the discount foodstore's southern elevation, will operate within the store's operational hours.

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 1,804sq.m and a net trading area of 1,315sq.m. The trading floorspace within every 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, including tobacco. In addition, there is no staffed 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, dispensing pharmacy, dry-cleaning, betting offices, opticians, 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 point is also considered in greater detail as part of the retail impact section of this Planning and Retail Statement.

Trade Counter Unit

- 3.9 The proposed trade counter unit will be single-storey in height and will extend to 407 sq. m GEA / 372 sq. m GIA. The anticipated end user will be Toolstation, a national builders merchant with some 600 existing trade counters across the UK. Toolstation trade from a B8 Use Class, as is evidenced by the location of their wider store portfolio (largely within business parks) and the fact that their units involve predominantly storage space supported by a small quantum of ancillary sales floorspace. Should the Local Planning Authority feel it necessary, a bespoke planning condition could be agreed both to define the quantum of this ancillary sales floorspace and the trade counter use of the building more generally. The unit will result initially in the creation of between 10 to 15 full-time equivalent jobs, the majority of which will be recruited locally

Layout

- 3.10 In terms of layout, as the submitted Proposed Site Layout Plan (Ref. 2269BOL-112 Rev. L) illustrates, the foodstore will occupy a central location within the site with the internal vehicular routes and customer car parking predominantly occupying its western and southern sides. The proposed trade counter 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 (11); 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-eastern corner).

Meanwhile, the existing vehicular access from Westgate to the site at the south-western corner will be modified and improved.

- 3.11 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.
- 3.12 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 walking distance north of the site along Westgate.
- 3.13 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

- 3.14 In terms of design, the proposed foodstore and ancillary trade counter unit promotes a clean, contemporary approach utilising extensive glazing on its western elevation. The foodstore 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.

- 3.15 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.
- 3.16 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. These elevations will also benefit from landscape screening.
- 3.17 In summary, the proposed foodstore and trade counter unit will be of a contemporary design with a strong horizontal emphasis and constructed using modern methods and materials. The buildings will be of steel framed construction and will incorporate, in addition to extensive glazing, high-quality two-tone cladding to provide a clean, modern finish. This materials palette is very much reflective of the architectural aesthetic of surrounding commercial buildings already apparent in the locality. 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.

Landscaping

- 3.18 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 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. Proposed landscape planting will include the introduction of 35 new trees across the site and the retention of the majority of the site's existing mature trees.
- 3.19 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

also been given to the site's eastern boundary (involving the retention of mature trees), to ensure that appropriate vegetation is provided to create a buffer with the closest residential properties adjacent.

Car & Cycle Parking

- 3.20 The proposed car park will provide a total of 140 car parking spaces which will be dedicated to those wishing to use the foodstore and trade counter 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 during the course of the application's determination, should this be necessary.
- 3.21 The car park will include 9 accessible spaces for disabled customers and 11 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.
- 3.22 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

- 3.23 Servicing access will be taken from Westgate at the south-western corner of the site. The foodstore's servicing area will be located on its eastern elevation. This will incorporate a delivery ramp, sheltered canopy, and dock leveller system which means products can be unloaded without any external activity, such as forklift trucks, scissor lifts or cages. Servicing is therefore a much swifter and quieter process than it is for larger mainstream foodstores with a traditional 'service yard' arrangement.
- 3.24 In terms of the foodstore's servicing procedure itself, in the case of Heavy Goods Vehicle ('HGV') deliveries, this would typically take 30 - 60 minutes 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 process 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). Goods deliveries will be received to the 'back of house' area which will be accommodated in the southern part of the Aldi foodstore.

- 3.25 It is anticipated that the Aldi foodstore will receive an average of four HGV deliveries per day. Three articulated HGV deliveries per day come from the Regional Distribution Centre (RDC) and there is one delivery per day of milk by a local supplier, usually using a medium sized goods vehicle. Daily deliveries of milk, bread and morning fresh produce are received prior to, or as early as possible after, the store opening in the morning, and are delivered by one Aldi HGV and one milk delivery vehicle.
- 3.26 All Aldi delivery vehicles are equipped with Reversing Cameras and Audible Warning Systems enabling the driver and customers to be aware of the reversing vehicle. Where required, a trained 'Pedestrian Marshal' is utilised by the store to guide pedestrians in a safe manner whilst a service vehicle is manoeuvring. HGV access to the service area has been designed to accommodate the required turning manoeuvres of the largest servicing vehicle in Aldi's fleet (a 16.5m articulated goods vehicle) and a 'swept path analysis' is presented as part of the accompanying Transport Assessment (prepared by Cameron Rose Associates) showing this entering and leaving the site safely and in forward gear.
- 3.27 For servicing of the secondary trade counter 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. Given the modest size of this building and its function as a Use Class B8 builders merchant, servicing and deliveries to the unit will not be of the same magnitude as the proposed foodstore and will cause minimal disruption to the customer usage of the car park.
- 3.28 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. Accordingly, the applicants are seeking to negotiate through an appropriately worded planning condition minimum servicing hours at the discount foodstore of:
- 06:00 hours to 23:00 hours – Mondays to Saturdays; and,
 - 08:00 hours to 18:00 hours – Sundays.
- 3.29 The same servicing hours are sought for the smaller, ancillary, trade counter unit. The accompanying Noise Impact Assessment prepared by BWB justifies the servicing hours proposed across the development.

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.

Hours of Operation

3.30 Aldi's foodstores are open seven days per week (including the majority of Bank Holidays) but 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:

- 08:00 hours to 22:00 hours – Mondays to Saturdays; and,
- 09:00 hours to 18:00 hours – Sundays

(**Note** – 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.)

3.31 In the case of the smaller, ancillary trade counter unit, the applicants would welcome a discussion in regard to potential operational hours as part of the planning application determination process.

Summary

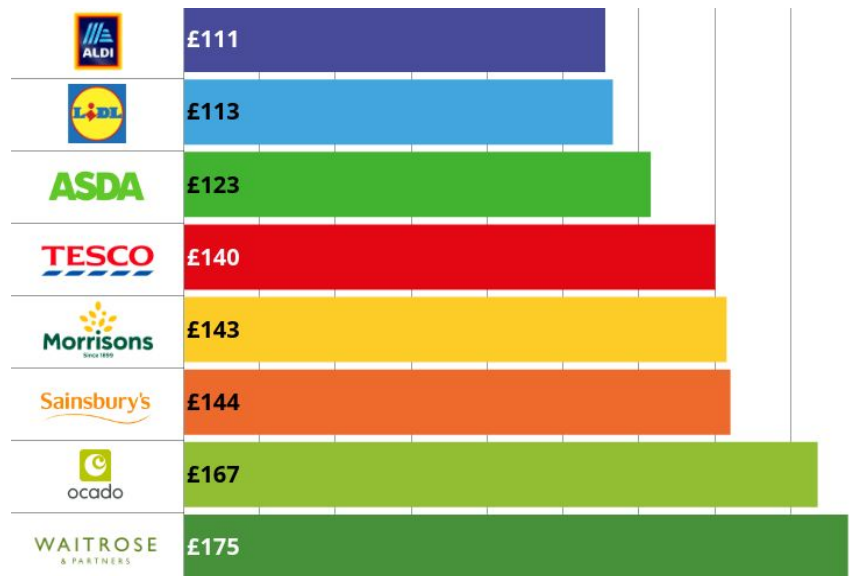
3.32 In summary, the proposed Aldi discount foodstore and ancillary trade counter unit will represent a high-quality development and will promote a contemporary design using an appropriate materials palette which also respects the site's commercial context, to the benefit of the local and wider environment. Full details regarding the design of the scheme and its proposed materials are contained in the plans and elevations submitted with this application as detailed in the accompanying Design and Access Statement, which should be referred to for further design related information.

4. Aldi Stores Limited

About Aldi

- 4.1 Aldi is the applicant for this scheme and 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 875 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. This is evidenced by the below chart published by independent consumers' association 'Which?' in mid-2020. The chart compares the average cost of a trolley of 108 groceries and household essentials (i.e. a bulk food shopping trip) and shows, for example, that an equivalent shop at a mainstream foodstore such as Tesco, Morrisons or Sainsbury is at least 27% more expensive. In the case of Asda specifically (which is currently Skelmersdale’s largest mainstream foodstore), Aldi is found to be **10% cheaper**.

Figure 4.1 - Chart Comparing Average Cost of Groceries and Household Essentials (Source: 'Which?' March 2020)



- 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 2019 Good Housekeeping Food Awards; named Best Value Supermarket at the Moneywise Home Finances Awards 2019; and Best Grocer at the Retail Week Awards 2019. For recognition of investment in people, Aldi was crowned Employer of the Year at The Grocer Gold Awards 2017, whilst they were named Grocer of the Year at The Grocer Gold Awards 2018.

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.
- 4.5 The key aspects 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 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.
- 4.6 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.
- 4.7 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.

- 4.8 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.
- 4.9 The deliberate intention is to restrict the range of core goods to approximately 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.
- 4.10 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 and their trading philosophy does not include a staffed butchery, fishmonger, 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 a Post Office, dispensing pharmacy, dry-cleaning, opticians, betting office, travel agent, mobile phone shop or photo processing.
- 4.11 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.
- 4.12 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.
- 4.13 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

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

Catchment

- 4.15 As Aldi stores are of modest scale and fulfil a local shopping role, it means more than one store can be accommodated in a Local Authority area. In high population density areas such as towns and cities several Aldi foodstores can be sustained, reflective of the fact that each is modest in size. They work together as a network to serve the community, as opposed to mainstream foodstores whereby a single 'superstore' serves a much wider geographic area. The catchment for a new Aldi foodstore is therefore typically local in nature and often a proportion of the shoppers attracted are existing Aldi customers who have been travelling to their nearest store (possibly several miles away), but with a new store opening close by, this can reduce their need to travel.
- 4.16 Aldi's local presence can assist in clawing back expenditure being spent elsewhere by providing a foodstore 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

- 4.17 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.
- 4.18 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.

- 4.19 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

- 4.20 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.
- 4.21 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. A full explanation of this principle is set out in the accompanying Transport Assessment.

Residential amenity

- 4.22 The opening hours of Aldi stores are more limited than some other larger supermarkets which operate 24-hour. Currently Aldi stores operate 0800 to 2200 Monday to Saturday and for six hours between 1000 to 1800 on Sundays, to comply with Sunday Trading Laws. As Aldi stores are located in residential areas, Aldi is committed to being a responsible neighbour and seeks to ensure the amenity of residents is maintained.

Job Creation and Training

- 4.23 New Aldi stores generally employ between 40 - 50 staff. 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 ensure that its foodstores have a positive impact on the local communities that they are located within as recruitment is focused locally. Job vacancies are advertised in nearby stores and in the local press alongside Aldi's website. This approach usually results in the majority of staff being recruited from the local area. In addition, it is not unusual for the retailer to work with the local Job Centre Plus when recruiting for a new foodstore so that residents of the local area are specifically targeted.

- 4.25 It should be noted that part-time staff are placed on a 15, 20 or 25 hour contracts at above industry average pay. As such, many part-time positions at Aldi would actually be viewed as full-time positions in other industries, including the retail sector.
- 4.26 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.
- 4.27 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.
- 4.28 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.
- 4.29 Finally, during the construction of the foodstore, by working with their chosen contractor Aldi are often able to identify individuals that are seeking work placements and may be able to accommodate these during the project. Aldi typically identify candidates that will benefit the most from the opportunity, particularly those that are currently undertaking some form of construction related education and training, and those that are looking to re-enter the industry after a period of absence. Aldi works with its appointed supply chain to support work placements.

Aldi Foodstore Sustainability Features

- 4.30 The following table sets out a summary of the sustainability features that are incorporated into each new Aldi foodstore as standard:

Main themes	Sub Theme	Proposed Measures to be Incorporated into the Development
Minimise Energy Use	Improving Building Envelope	Improve building fabric performance by using materials with low U values.
		Reduce Air Permeability for the development.
	Reducing Energy Demand	Use of LED technology for internal / external lighting.
		Detailed Specification of energy saving fitting for refrigeration system.

	Allocation of Renewable Energy	Re-use of waste heat from refrigeration system to heat the retail area.
Sustainable Building Materials	Material Specification	Use of recycled and secondary aggregates where possible.
		Use of timber from sustainable sources, including the reuse of timber where possible, whilst procuring new timber from sustainable sources such as FSC and PEFC sources.
		Use of materials that where possible have a low embodied energy, including making firm commitments to procure materials from local sources where possible.
		Procuring materials will be done with consideration to manufacturers and suppliers with accredited EMS and ISO Standards.
Sustainable Transport and Accessibility		Cycle parking for the site would be provided in accordance with LPA cycle parking standards.
		One twin-headed Faster Charger for Electric Vehicles will be provided at all new stores with two dedicated parking bays. Ducting to a further four bays for potential future use.
Water Conservation and Management	Water Use within the Retail	A pulsed water meter would be proposed for the development to monitor water use. 2/4 litres wc's in retail store.
	Minimising Flood Risk	Proposals would be put forward that would not add to the flood risk in the area. A number of SUDS and engineering solutions could be put forward for this purpose, subject to site specific conditions.
Waste Management	Construction Waste	Recycling would occur during the construction phase where waste would be segregated and split into recyclable components.
		General waste would be disposed of responsibly and sent to licensed waste handling facilities.
Reduction of detrimental Environmental Effects		Hydrocarbon traps will be placed around the perimeter of the car park area where necessary.
		The development does not include materials that are toxic to humans.
		All insulation materials and refrigerants have an ODP value of 0 and a GWP of 5 or less.
		Where necessary, land contamination would be remediated.
		External lighting will be compliant to best practice guidelines from the Institute of Lighting.
Site Management	Commissioning and Handover	A building user guide and building education would be provided as part of the development's handover.

Heat Recovery System (Re-Usable Energy)

- 4.31 Perhaps the most significant sustainability feature which is provided as standard on all new Aldi foodstores is their 'heat recovery system', which constitutes a 're-usable' energy source. In order to minimise energy demand in stores, Aldi seek to re-use and re-cycle any waste energy where possible.

The greatest area to recover energy in the store is the 'waste heat' generated by the refrigeration system and this is recovered to heat the building.

- 4.32 Aldi use a system to recover waste heat from the food refrigerator circuits which would otherwise be discharged into the atmosphere. The heat from the refrigerator would previously have been rejected when the refrigerant hot gasses are cooled in the condensers by external air. Previously a gas heating system was used to make up any shortfall in heating demand.
- 4.33 With the input and detailed design of a 'refrigeration engineer' and a 'mechanical services engineer', the waste heat is harnessed via a CO2 refrigerant lead heat recovery system that rejects the waste heat into a low temperature hot water heating circuit which in turn provides heat to an underfloor heating array or a number of ceiling mounted convectors on the sales floor if the store is leasehold. **This system provides 100% of the total building heating demand.** The heat recovery system has totally removed the need for an independent gas heating system. The underfloor heating system provides heat to the store with a high percentage of radiant heat, minimising the negative affect that the sales floor chillers have on the store heating.
- 4.34 To demonstrate the effectiveness of this system, Aldi have used a typical model in Leicester which, being in the Midlands, represents the average for the whole of the UK. The typical energy demand for an Aldi Development in the Midlands is 271,624 kwh per year. The total energy demand for heating to an Aldi Store is 115,416 kwh. The refrigeration installation would generate 150,000 kwh which is more than sufficient to heat all the store.
- 4.35 With all the energy demand required to heat the building, being recovered from re-usable energy, 115,416 kwh of the total energy demand for the building of 271,624 kwh is generated from re-usable energy. **This represents over 40% of the energy demand for the development being created by re-usable energy.** Whilst it is acknowledged that this system is not technically a form of 'renewable energy', it results in the foodstore being exceptionally efficient in terms of the off-site energy requirements. This is a more environmentally friendly approach than an otherwise inefficient building that benefits from a limited on-site renewable energy source.

5. Planning Policy Context

- 5.1 This section provides a review of 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.

Introduction

- 5.2 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 Development Plan for the purposes of this planning application comprises the West Lancashire Local Plan (2012-2027), which was adopted on October 2013 (hereafter referred to as the 'Local Plan').
- 5.3 Accordingly, the 'starting point' in the determination of planning applications within the West Lancashire area are the policies contained within the Local Plan. However, Annex 1 of the National Planning Policy Framework ('NPPF') (July 2021) is clear that the weight to be afforded to policies within plans of this age should be proportionate to their degree of consistency with the policies contained within this national policy document. In short, where entire policies or key components of them are out-of-date, equivalent guidance contained within the NPPF represents a very significant material consideration.
- 5.4 Alongside the Local Plan (the development plan), there are other national planning policy and guidance documents that represent **material considerations** in the determination of this planning application and these are also summarised (where relevant) in this section of our Planning Statement. The **National Planning Policy Framework (July 2021)** is of greatest significance in this regard as this sets out the Government's planning policies for England and how these should be applied. The policies contained within the NPPF are important material considerations which should be taken into account when dealing with individual planning applications.
- 5.5 Whilst it is noted that West Lancashire Borough Council has just embarked on the preparation of a new Local Plan to cover the period 2023 to 2040, we do not consider that this should be given any weight as part of the determination of Aldi's planning application. This is given that the new plan is only at the "*Scope, Issues & Options*" consultation stage and therefore fully worded planning policies have not been formulated or tested.

The Development Plan

West Lancashire Local Plan (2012 - 2027)

5.6 The West Lancashire Local Plan (2012-2027) was adopted by the Council on 16th October 2013. The relevant policies of the adopted Local Plan in the context of this planning application are summarised below:

Employment Land

- 5.7 **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. The policy adds that 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.
- 5.8 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*'. It is noted that the planning application site falls within the defined '*Westgate, Skelmersdale - Other Significant Employment Site*' (EC1(b)i). The policy aims to maintain the Borough's employment land supply and maximise opportunities for new economic investment in the Borough. It adds that development is allowed where this is overwhelming evidence that a site is unsuitable and unviable for employment-only development.
- 5.9 **Policy GN4** is also of relevance to West Lancashire's allocated employment land. This explains that the Council will seek to retain existing commercial / industrial (B1, B2 or B8) land and premises unless it can be demonstrated that one of the following tests has been met:
- a) the continued use of the site / premises for its existing use is no longer viable in terms of its operation of the existing use, building age and format and that it is not commercially viable to redevelop the land or refurbish the premises for its existing use. In these circumstances, and where appropriate, it will also need to be demonstrated that there is no realistic prospect of a mixed-use scheme for the existing use and a compatible use; or
 - b) the land / premises is no longer suitable for the existing use when taking into account access / highways issues (including public transport), site location and infrastructure, physical constraints, environmental considerations and amenity issues. The compatibility of the existing use with adjacent uses may also be a consideration; or,

- c) marketing of the land / property indicates that there is no demand for the land / property in its existing use.

Town Centre Hierarchy and Retailing

- 5.10 **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.
- 5.11 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.
- 5.12 **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.
- 5.13 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 Local Plan Policies

- 5.14 Other policies considered relevant in the consideration of the proposed development include:
- **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 Planning Considerations

National Planning Policy Framework (July 2021)

- 5.15 On 20th July 2021 the Government published a revised version of the NPPF. The most recent NPPF is a material consideration in the determination of all planning applications and fully replaces all previous editions.
- 5.16 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.
- 5.17 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.

Presumption in Favour of Sustainable Development

- 5.18 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*

- ii. *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”.*

5.19 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. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Finally, Paragraph 12 is clear that Local Planning Authorities can 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.

Ensuring the vitality of town centres

5.20 Town centre policies are dealt with at Section 7 of the NPPF, under the title ‘ensuring the vitality of town centres’. With regards the sequential test in particular, Paragraph 87 of the national policy document explains that:

“Local planning authorities 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 only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered”.

5.21 ‘Main town centre’ uses are defined within Annex 2 of the NPPF as: retail development, leisure, entertainment facilities, more intensive sport and recreation uses (including restaurants), offices, arts, culture and tourism development (including hotels).

5.22 For the purposes of the application of the sequential test, Annex 2 of the NPPF explains that an ‘edge-of-centre’ retail development site is defined as a location that is ‘well connected and up to 300m from the primary shopping area’ (NPPF, Annex 2, Page 66). By implication, an ‘in-centre’ site is one which falls within the primary shopping area, whilst an out-of-centre site is one which is beyond 300m from the primary shopping area and is not ‘well connected’ to it. The NPPF is clear that in determining whether a site falls within the definition of ‘edge-of-centre’, account should be taken of local circumstances.

5.23 Importantly, Paragraph 88 of the NPPF explains that when considering edge-of-centre and out-of-centre proposals in the context of the sequential approach, preference should be given to accessible sites which are well connected to the town centre. It also states that applicants and local planning

authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre sites are fully explored.

5.24 Paragraph 90 states 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).

5.25 Finally, Paragraph 91 of the NPPF states that where an application fails to satisfy the sequential test it should normally be refused. The implication being that were such a policy conflict is not identified planning permission should be granted.

Making Effective Use of Land

5.26 Paragraph 122 of the NPPF explains that planning policies and decisions need to reflect changes in the demand for land. It states that where the Local Planning Authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

- a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and,
- b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

5.27 Paragraph 123 adds that Local Planning Authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. This very much echoes Paragraph 22 of the 2012 version of the NPPF, which was also clear that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of the site being used for that purpose.

Other Guidance

National Planning Practice Guidance

- 5.28 On 6th 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.
- 5.29 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.
- 5.30 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.
- 5.31 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.
- 5.32 There are a number of considerations that should be taken into account 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 and leisure development, this typically involves considering whether there is any 'flexibility' in a specific business model. For example, are multi-level formats possible? Whether flexible car parking arrangements can be pursued? Innovative servicing solutions introduced? Or a willingness to depart from standard formats explored. 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.
- 5.33 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 Local Planning Authorities should be acceptant of this where a robust justification is provided. See Paragraph: 012 / Reference ID: 2b-012-20190722.

- 5.34 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 on town centre locations can be more expensive and complicated than building elsewhere and Local Planning Authorities therefore need to be realistic and flexible in terms of their expectations.
- 5.35 In terms of the retail impact test, of greatest relevance to any quantitative analysis is considered to be paragraph 15 (Reference ID: 2b-015-20190722) of the guidance, which explains that as a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). It continues that retail uses tend to compete with their most comparable, competitive facilities and that conditions may be attached to appropriately control the impact of a particular use.
- 5.36 With regards impact on investment, paragraph 15 (Reference ID: 2b-015-20190722) explains that where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment and that key considerations will include:
- the policy status of the investment (i.e. whether it is outlined in the Development Plan);
 - the progress made towards securing the investment (for example if contracts are established); and,
 - the extent to which an application is likely to undermine planned developments or investments based on the effects on current/forecast turnovers, operator demand and investor confidence.
- 5.37 Paragraph 17 (Reference ID: 2b-017-20190722) explains that the retail impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Meanwhile, paragraph 18 (Reference ID: 2b-018-20190722) states that the judgement as to whether the likely adverse impacts are 'significant' can only be reached in light of local circumstances. For example, in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.

Design Guide Supplementary Planning Document

- 5.38 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

- 5.39 This section has identified the relevant policies of the adopted development plan and other material considerations to be taken into account in the determination of this planning application. These matters will be weighed in the planning balance.

6. The Sequential Test

- 6.1 Both Policy IF1 ('Maintaining Vibrant Town and Local Centres') of the West Lancashire Local Plan (2013) and Paragraph 87 of the NPPF (2021) 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 sizable purpose built two-storey mall comprising some 17 retail and commercial units and with a further 3 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).
- 6.3 Given the site's proximity to the local centre and the ease of pedestrian access, it can be classified as a well-connected **edge-of-centre** location in town centre policy terms. This is given that Annex 2 of the NPPF defines an edge-of-centre location as one which is well connected to and up to 300 metres from a centre's 'Primary Shopping Area'.

Scale and Form of Development, Catchment Area and Centres Assessed

- 6.4 Whilst both the NPPF and Planning Practice Guidance ('PPG') are silent on the appropriate area of search for sequentially superior sites, a conventional approach is to consider 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.
- 6.5 In this instance, the scale and form of retail development is a discount foodstore of 1,804sqm GIA (1,315sqm net sales) and a standalone trade counter unit of 372sq.m GIA, alongside requisite customer car parking (140 spaces), access roads, servicing area and associated hard and soft landscaping. However, the trade counter element of scheme is not relevant to the application of the sequential test as it represents Use Class B8 floorspace which is a policy compliant use on what is an existing employment site, based on the site's Local Plan allocation and Policy EC1.
- 6.6 Accordingly, it is necessary to test the discount foodstore in isolation and to define an area of search for sequentially preferable sites based purely on its specific trading characteristics. In this regard, 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 telephone 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.

- 6.7 In view of this analysis and as part of pre-application discussions with the Local Planning Authority, it was agreed that the two centres to be examined for sequentially preferable sites are Skelmersdale town centre and Up Holland local centre, with all other local centres of insufficient size to accommodate a discount foodstore.

Summary (Scale and Form of Development, Catchment Area and Centres Assessed)

- 6.8 Drawing the above together, a logical area of search for sequentially preferable sites should encompass 'in-centre', 'edge-of-centre' and better connected 'out-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) an Aldi discount foodstore and its associated car parking, access arrangements and hard and soft landscaping – as this is the scale and form of development that is proposed. A site will be considered sequentially preferable where it is 'suitable' and 'available' which necessarily includes consideration of deliverability / viability.
- 6.9 Whilst in this case the total site area is 1.16 ha and the mixed-use scheme involves some 140 car parking spaces, it is necessary for applicants and Local Planning Authorities to demonstrate 'flexibility' in their approach, in-line with Paragraph 88 of the NPPF. This can involve reducing down the site area for testing purposes to one which is commensurate purely with the scale and form of the 'main town centre' use floorspace proposed. This policy requirement and relevant legal / appeal precedents are examined in detail under the following headings.

The Requirement to Demonstrate Flexibility / Legal and Appeal Precedents

- 6.10 Paragraph 87 of the NPPF requires applicants and Local Planning Authorities to demonstrate 'flexibility' on issues such as format and scale when considering sites in, or on the edge, of existing centres as part of applying the sequential test. Whilst no indication as to what degree of flexibility is required is contained within the NPPF or indeed the Practice Guidance (other than 'format and scale')

the 'Rushden Lakes' Secretary of State ('SoS') Call-in decision² (which post-dates their original publication) has clarified the position, with the Inspector (Paragraph 8.49) highlighting that 'flexibility' concerns matters including *"flexibility in a business model, use of multi-level stores, flexible car parking requirements or arrangements, innovative servicing solutions and a willingness to depart from standard formats"*. In Paragraph 15 of the decision letter, the SoS agrees with the Inspector that these are issues of principal relevance in demonstrating flexibility.

6.11 This important Call-in decision has also provided clarity on whether there remains a requirement to consider 'disaggregation'³ when demonstrating flexibility as part of the sequential test. The Inspector is quite clear at Paragraph 8.47 of his report that *"there is no longer any such requirement stated in the NPPF"* and that *"had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF"*. In Paragraph 16 of the decision letter, the SoS agrees with the Inspector that there is no requirement to consider disaggregation when applying the sequential test. This approach has been followed in subsequent cases (see below).

6.12 A final matter of seminal importance when considering 'flexibility' and indeed interpreting the sequential test more widely is the Tesco Stores Ltd v Dundee City Council ('Dundee') Supreme Court Decision (2012). In summary, this establishes that:

- a) if a site is not suitable for the commercial requirements of the developer in question then it is not a 'suitable' site for the purposes of the sequential approach; and,
- b) that in terms of the size of the alternative site, provided that the applicant has demonstrated 'flexibility' with regards to format and scale (explained in the paragraph above), the question is then whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to physically fit the alternative site.

6.13 The implications of the Dundee decision were also considered by the SoS as part of the 'Rushden Lakes' Call-in decision. In Paragraph 15 of the decision letter, the SoS agrees with the Inspector that the sequential test relates entirely to the application proposal and whether it can be accommodated on an actual alternative site. In other words, the Dundee decision clearly applies to the NPPF.

6.14 Two further relatively recent High Court decisions⁴ have also considered (inter alia) the sequential test and confirmed the importance of demonstrating flexibility on issues such as format and scale. A developer's own intentions may be taken into account and have a bearing - for instance when

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

³ Consideration being given to the separation of a retail scheme across a number of sequentially superior sites.

⁴ Warners Retail (Moreton) Ltd v Cotswold District Council (2016) and Aldergate Properties Ltd v Mansfield District Council (2016).

considering what demand a proposal is intended to meet. However, the sequential approach should be 'operator blind' and not become a self-fulfilling activity and divorced from the public interest.

6.15 Specifically, in *Aldergate Properties Limited v Mansfield District Council* [2016] EWHC 1670 [Admin] the judgement emphasised that in considering how to apply 'suitability' and 'availability' the general meaning would be that a site should be "...*'suitable' and 'available' for the broad type of development which is proposed in the application by approximate size, type and range of goods. This incorporates the requirement for flexibility in [24] NPPF, and excludes, generally, the identify and personal or corporate attitudes of an individual retailer....*" (Paragraph 35 of Judgement).

6.16 In summary, whilst it is necessary for applicants to demonstrate 'flexibility' on issues such as format and scale when applying the sequential test, it is clear that under the NPPF there is no requirement to consider 'disaggregation' nor to explore changes that would materially alter the application proposal such that it no longer met commercial requirements (i.e. a material reduction in size). These matters have been considered as part of numerous 'call-in' and appeal decisions⁵ which post-date the publication of the NPPF and in which the SoS / Planning Inspectorate clearly draw heavily on the key caselaw referenced in this section when interpreting the sequential test (and specifically the requirement for disaggregation).

Flexibility in the Context of the Application Proposals

6.17 Aldi recognises the need for 'flexibility' in promoting sites for development and the retailer pursues non-standard stores where this will assist in meeting planning policy requirements. When considering the scope for flexibility, however, the inherent nature of Aldi's operation as a 'deep discount' food retailer must be borne in mind. Accordingly, there are a number of key areas where it is not possible to alter the core design of the store; as to do so would undermine the operational efficiency of the business model and hence its viability.

6.18 The fundamental requirements of a modern Aldi foodstore's design and layout are therefore as follows:

- **Retail Sales Area:** This is the most important aspect of store building design. A circa 1,300 sq. m floor area is required to provide approximately 2,000 core product lines, and the dimensions of the retail area are determined by the need to ensure adequate product display space is

⁵ See for example: APP/P0119/V/17/3170627 - The Mall, Cribbs Causeway, Patchway, South Gloucestershire BS34 5DG (October 2018); APP/T3725/W/18/3204311 - Leamington Shopping Park, Tachbrook Park Drive, Warwick, CV34 6HR (March 2019); and, APP/R0660/V/17/3179610, APP/R0660/V/17/3179605 and APP/R0660/V/17/3179609 - Land at Earl Road, Handforth Dean, Cheshire, SK9 3RW (June 2019).

provided. The rectangular shape of the retail sales area is also specifically designed to enable efficient transfer of products. In view of its critical importance to the trading and operational success of Aldi's business, the size and proportions (shape) of net retail floorspace is one area where it is not possible for Aldi to depart from their core design, as to do so would undermine trading viability. Such a configuration is coincidentally an optimum solution to enable shoppers to shop whilst respecting social distancing and cannot reasonably be reduced.

- **Storage and Ancillary Non-Retail Floorspace:** Where the size and shape of a particular site requires reconfiguration, Aldi can exhibit flexibility, such as compromising service and storage facilities. However, the foodstore must be capable of being serviced by a HGV delivery vehicle and the site layout must enable the delivery vehicle to enter and leave in forward gear, and for the vehicle to be able to dock correctly and safely in the purpose built delivery area of the store (a dock-leveller).
- **Customer Car Parking:** Aldi foodstores are required to have immediately adjacent surface-level car parking facilities. This is because an Aldi foodstore's primary function is to cater for 'bulk' food shopping needs and therefore very many customers will be visiting to undertake a 'weekly' shopping trip, involving several heavy shopping bags. Customers may also be visiting to purchase a product from Aldi's non-food 'special buy' range which could be large / heavy and therefore unmanageable on foot. Accordingly, it is a pre-requisite that most customers have the opportunity to take their goods home via private car, irrespective of the accessibility of the store location via sustainable modes of transport, for those undertaking smaller basket shopping.

6.19 In light of the above, with regards the application of 'flexibility' to the planning application scheme when applying the sequential test, the following is proposed:

- Whilst caselaw and appeal precedents are clear that there is no requirement to consider the disaggregation of 'main town centre' uses where these are proposed as part of a single scheme, in this case the second unit is not a 'main town centre' use but a trade counter (Use Class B8) which is in accordance with the site specific policy allocation. Accordingly, it is appropriate to test the proposed discount foodstore in isolation in this case – with a consequential reduction in the required site area.
- Should the foodstore be tested in isolation, the 140 car parking spaces could be reduced by broadly one third to 100 – which is Aldi's minimum requirement for their current foodstore format and is reflective of anticipated demand. This change would also result in a reduction in the required site area.

- It is acknowledged that the scheme proposed at Westgate contains ample perimeter landscaping. Whilst this is considered necessary from an aesthetic and ‘buffering’ perspective, it is recognised that a scheme could theoretically be delivered without it, especially if located in a different context and without residential properties bounding the site to the east and south. This again could reduce the minimum required site area.

6.20 Based on the above areas where ‘flexibility’ can be demonstrated in relation to this specific scheme, it is considered that a site area some **40%** smaller than the planning application site (which is 1.16 ha) can be used for sequential testing purposes. This would result in a site requirement of **0.7ha**, which is regarded as the minimum realistically necessary to accommodate a discount foodstore of 1,800 sq. m and its supporting site infrastructure (i.e. customer car parking, vehicular access/egress, serving area, pedestrian circulation space and basic landscaping).

6.21 In summary, measures have evidently been taken in the design of the scheme to maximise ‘flexibility’ in terms of the scale and form of mixed-use development proposed. Notwithstanding this, for the purposes of the sequential assessment, the applicants have tested a considerably smaller site area than is actually proposed as part of this planning application (reduction by some 40% to 0.7ha). Thus, the applicants are clearly demonstrating ‘flexibility’ in line with the NPPF’s requirements.

Sequential Site Assessment

6.22 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>Tawd Valley Centre, Ingram Rd / Northway, Skelmersdale Town Centre</p>	<p>The Tawd Valley Centre 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. The first, a Section 73 application, enabled retail Unit C to be split into two clearly defined units, one of which (Unit C1 - 2,062 sq. m GIA) will accommodate B&M and the other (Unit C2) a non-food retailer of 992 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.</p>

	<p>Construction of the scheme commenced in early 2021 and Lidl secured advertisement consent in November 2021 for fascia panels and various other signage associated with their practically complete foodstore. This approval coincided with a press release from St Modwen Developments and their contractor Caddick Construction which confirmed that the new retail units at the Tawd Valley Centre (including B&M and Lidl) would be opening to the public in the Spring of 2022.</p> <p>Set against this context of the end users of the scheme's largest units being contractually committed and confirmed beyond doubt, the scheme itself practically complete, and the opening date announced, the site cannot logically be regarded as 'available' in the context of the sequential test. The whole purpose of the test is to facilitate development on town centre sites in the first instance, but when that development is already at a stage of completion and imminent occupation (as in this instance) it cannot be right that it is used to block edge-of-centre investments elsewhere in the borough. Accordingly, the weight to be attached to the alleged 'availability' of the Tawd Valley site's largest units at this point in time has to be exceptionally limited.</p> <p>Turning to 'suitability', the only two units large enough to accommodate the scale and form of discount foodstore proposed (Units C1 and D) are to be imminently occupied by B&M and Lidl respectively. Drawing conclusions on the suitability of these units is therefore largely irrelevant.</p> <p>The remaining retail units within the Tawd Valley scheme which require examination from a suitability perspective are Unit C2 (992 sq. m) from the largely complete phase one and the smaller 'flexible use' retail units (totalling 527 sq. m) which will form part of a future phase two. It is clear from our appraisal of these remaining units that they are of an insufficient scale to accommodate a discount foodstore either individually or collectively. Accordingly, it can be robustly concluded that none of the retail units in the Tawd Valley scheme which are capable of being occupied either now or in the future can be regarded as 'suitable' alternatives for the scale and form of retail development proposed and must be dismissed on this basis.</p> <p>In summary, the detailed sequential assessment set out at Appendix III has demonstrated that the Tawd Valley retail scheme site does not represent a sequentially preferable alternative for the discount foodstore proposed. Its largest units cannot be regarded as 'available' based on any logical, real world interpretation of this test. Meanwhile, remaining units are evidently not suitable for the scale, form and format of discount foodstore required by Aldi.</p>
<p>Land adjacent to College Way, Skelmersdale</p>	<p>Land adjacent to College Way, Skelmersdale extends to approximately 1.36 ha and is located adjacent to West Lancashire College (south-west) and an Asda superstore (east). For the purposes of the sequential test the Site is considered to be an in-centre location.</p> <p>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 of insufficient size to accommodate the proposed scale and form of retail development. A discount foodstore on College Way would also have no visibility or vehicular access from Ingram or Northway, delivery of such a retail use in this peripheral and inaccessible location would not therefore be commercially viable.</p>

	<p>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>
<p>Existing Aldi Foodstore, Ground Floor, Concourse Shopping Centre, Skelmersdale</p>	<p>The existing Aldi foodstore in the Concourse Shopping Centre (an in-centre opportunity) extends to 1,080 sq. m GIA / 880 sq. m net sales. Aldi's current format (circa 1,800 sq. m GIA / 1,315 sq. m net) therefore has a gross floor area which is some +67% larger than the Concourse Centre unit, and net sales area which is +49% larger. This Aldi store is therefore relatively unique in terms of their portfolio and relies on 'top-up' food shoppers, rather than those undertaking a weekly (or 'bulk') food shopping trip.</p> <p>Notwithstanding its smaller size and different trading profile, Aldi still consider their Concourse Centre store to be viable. Whilst Aldi's objective remains to bring their latest discount foodstore format to Skelmersdale so that they can better meet the needs of Skelmersdale residents from a store which is capable of providing Aldi's full food offer, they are now also proposing to retain their Concourse Centre store (where the current lease runs until the end of 2025). This represents a change to their original strategy and the sequential test has been applied on this basis.</p> <p>With regards 'suitability', the existing Concourse Aldi foodstore itself would evidently not be 'suitable' for the scale and form of discount foodstore proposed on the application site by virtue of its much smaller size and must be dismissed on this basis.</p> <p>We have also examined LCP's suggestion (see objection dated 3rd December 2019) that a larger unit could be assembled via the amalgamation of units 100 (currently Aldi), 102 (West Lancashire Wellbeing Hub) and 104 (Field Fresh Groceries) to provide a single retail unit of comparable size to Aldi's proposed foodstore.</p> <p>Accordingly, LCP simply suggesting that a unit commensurate with a discount foodstore could be hypothetically assembled within the Concourse Centre does not make this 'suitable' or commercially 'viable' for the scale and form of discount foodstore proposed. Aldi's Concourse Centre store already suffers from a range of operational inefficiencies which are inherently linked to its in-wards facing, shopping mall location, which has no dedicated car parking.</p> <p>These issues will not be resolved by the expansion of the foodstore unit. All this will do is increase the cost burden without providing a store capable of serving the needs of 'bulk' food shoppers. Accordingly, whilst Aldi believes that their current store has a role to play in Skelmersdale as predominantly a 'top-up' food shopping destination, it does not consider that it would be suitable / viable for any discount food retailer to take on the cost of its expansion and the ongoing rent increase for a store incapable of delivering a commensurate increase in sales. The hypothetical amalgamated unit must therefore be dismissed as unsuitable on this basis.</p> <p>With regards the 'availability' of the floorspace required, Aldi's unit is evidently not available as they have a lengthily lease in place and no intention of changing the format of their current foodstore in the Concourse centre – the trading profile of which they feel is appropriate in its current form. Meanwhile, on the best information available, neither</p>

	<p>Units 102 or 104 are available – with one only recently occupied by a medical facility and the other retaining a long-term tenant. The conclusion to be drawn from this evidence is that the units involved are not ‘available’ for the scale and form of discount foodstore proposed.</p> <p>In summary, the detailed sequential assessment set out at Appendix III has demonstrated that the Concourse Centre’s Aldi foodstore does not represent a sequentially preferable alternative for the discount foodstore proposed, either in isolation or as part of an expanded unit.</p>
<p>Other Vacant Units, Concourse Shopping Centre, Skelmersdale</p>	<p>Based on our appraisal of the shopping centre utilising up-to-date field work and Experian GOAD data, we have identified and reviewed the ten largest vacant units on the ground and first floors as part of Appendix III.</p> <p>Our findings are that even the largest vacant unit identified in the Concourse Shopping Centre (390 sq. m) is more than four times smaller than the scale and form of discount foodstore proposed on the application site (1,804sqm GIA).</p> <p>Accordingly, even allowing for a very considerable degree of flexibility, the vacant units identified would be unable to achieve Aldi’s net sales area alongside all necessary back-of-house provision. The vacant units must therefore be regarded as ‘unsuitable’ for the scale and form of development proposed by virtue of their size.</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 ground and first floor level. It involves a lengthily walk through the mall and then on to the surface level or multi-storey car park. An Aldi foodstore’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 vacant units in the Concourse Centre achieving this objective and renders them unsuitable accordingly.</p> <p>Given the above evidence, it must be concluded that whilst the vacant units identified in the Concourse Centre are evidently ‘available’, there are a variety of reasons why they would not be ‘suitable’ for occupation by Aldi, not least their insufficient size. Accordingly, these units do not represent sequentially preferable alternatives to the planning application site.</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 0.6ha. The land forms part of the recreational space associated with St Thomas the Martyr CoE Primary School, with access taken from Highgate Road. 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>Our appraisal of the site 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.</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</p>

	<p>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>
<p>Former Glenburn Sports College Site, Yewdale, Southway, Skelmersdale</p>	<p>The former Glenburn College site extends to 1.5 ha and is located to the south of the Concourse Shopping Centre in Skelmersdale, albeit it is separated by woodland and greenspace. The site previously accommodated a local secondary school prior to its demolished in 2021.</p> <p>In our view the college site cannot be regarded as preferable to the application site on the basis that it is sequentially inferior. This is in view of its much poorer connectivity to the closest defined centre. Our commentary has explained that the college site is a full 300m walking distance from Skelmersdale town centre and the route involves a public footpath through a wooded area which is poorly lit, contains various steps, and is steeply sloped both down and back up a river valley.</p> <p>Accordingly, whilst the planning application site offers the opportunity to foster linked shopping trips with Sandy Lane local centre (175m north) and can credibly be regarded as ‘edge-of-centre’, the college site is evidently ‘out-of-centre’ and offers no realistic prospect of linked shopping trips with Skelmersdale town centre. In this context, the college site cannot be regarded as sequentially preferable to the planning application site and should be dismissed as an alternative on this basis.</p> <p>A further suitability constraint is that Lancashire County Council and other key stakeholders (including West Lancashire BC) have identified the former college site as the preferred location for a new railway station to serve Skelmersdale. A funding bid has recently been submitted to Government which confirms this. It is inconceivable that the Local Planning Authority would entertain an alternative proposal for a use such as a discount foodstore, given the significance and importance of delivering a new rail link to the town. This therefore represents a clear ‘suitability’ barrier.</p> <p>Turning to availability, the County Council acquired the site in 2017 specifically for the rail project and, having formally submitted their business case to the Government as recently as September 2021, all evidence suggests that they still intend to use the land for purposes of a future station and public transport hub. On this basis, the site is evidently not ‘available’ for an alternative use such as a foodstore.</p> <p>Given the above evidence, it must be concluded that the former Glenburn College site is neither ‘suitable’ nor ‘available’. Accordingly, it is evidently not a sequentially preferable alternative to the application site.</p>

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 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. The Retail Impact Test

- 7.1 Paragraph 90 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'*⁶ 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.
- 7.3 However, this latter requirement is at odds with more recent town centre policy contained within national guidance (i.e. NPPF July 2021) 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.
- 7.4 In interpreting national town centre policy concerning retail impact, it is noteworthy that Paragraph 91 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

⁶ Main Town Centre Uses are defined by Annex 2 of the National Planning Policy Framework as: retail development, leisure, entertainment facilities, more intensive sport and recreation uses (including restaurants), offices, arts, culture and tourism development (including hotels).

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”.*

- 7.5 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.
- 7.6 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

- 7.7 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 2026) from the time the application is made.
- 7.8 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

- 7.9 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.

7.10 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.

7.11 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.

7.12 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 II** of this Planning and Retail Statement.

Convenience and Comparison Goods Quantitative Impact

Turnover of Proposed Retail Development (Table 1)

7.13 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.

- 7.14 A sales density of £11,517 per square metre (2019 Prices) has been applied to the convenience goods floorspace of 1,052 sq. m to provide a maximum convenience goods turnover of £12.24m in our base year of 2022 (remaining at £12.24m in our test year of 2025 given a lack of forecast growth). It is worth highlighting that the sales density utilised is derived from Mintel's 2021 UK Retail Rankings (albeit adapted with updated floorspace and unit numbers supplied by Aldi Stores Ltd) and is verified by Aldi as being consistent with their future sales expectations of a foodstore of this size and in this location. In terms of comparison goods, a sales density of £9,755 per square metre has been applied to the proposed Aldi floorspace of 263 sq. m to provide a maximum comparison goods turnover of £2.54m in the base year of 2022 (increasing to £2.77m in the test year of 2025).
- 7.15 With regards the proposed Use Class B8 'trade counter' unit of 372 sq. m, it is intended that this will be occupied by national builders merchant 'Toolstation'. Trader counters such as this involve predominantly storage space supported by a small quantum ancillary sales floorspace. Accordingly, the comparison goods sales density adopted is reflective of the '*sales per outlet*' figure for Toolstation from Mintel Retail Rankings 2021. On this basis, the small quantum of comparison goods floorspace (up to 20% of the gross building area) has been assumed to generate a sales density of £16,801 per sq. m. This would translate into a comparison goods turnover of £1.24m in the base year of 2022 (increasing to £1.35m in the test year of 2025).

Population (Table 2a and 10a)

- 7.16 The base population (2022) 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 November 2021). The baseline population has then been projected forward to the test year of 2025 utilising the population growth forecasts which are provided by the Experian report (based on latest births, deaths and inward/outward migration trends).
- 7.17 On this basis, the defined Primary Catchment Area comprising Skelmersdale and its rural hinterlands is identified to contain a resident population of approximately 53,820 people in 2022, which is set to increase to 54,167 people by 2025. This represents growth of 347 people over the next three years (22 to 25). Looking at the West Lancashire study area as a whole, it has an estimated population of 129,927 people in 2022, rising to 130,765 people in 2025 – growth of some 838 people over the three year test period.

Per Capita Expenditure Assumptions (Tables 2b and 2c Convenience Goods and Tables 10b and 10c Comparison Goods)

- 7.18 Per capita convenience and comparison goods base expenditure data for our catchment area has been sourced from Experian Location Analyst software (November 2021). Our analysis of both convenience (Table 2b) and comparison goods (Table 10b) expenditure capacity draws upon 'forecast' growth rates as set out under Figure 6, Appendix 3, of the Experian Retail Planner Briefing Note 18 (October 2020). The latest available at the time of writing.
- 7.19 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. This is particularly important at the present time given the economic implications of the Covid-19 pandemic. Forecast growth rates 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 and the implications of the Covid-19 pandemic. In short, full regard has been taken of the pandemic in the preparation of our RIA.
- 7.20 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 Figure 5, Appendix 3, Page 19, of Experian's Retail Planner Briefing Note 18, October 2020 (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). Again, this latest Briefing Note has full regard to the Coronavirus pandemic and its implications for non-store retail trade (such as on-line shopping) over the short to medium term.

Total Convenience and Comparison Goods Expenditure (Tables 2d and 10d)

- 7.21 Tables 2d and 10d 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 £114.5m of convenience goods expenditure within the defined Primary Catchment Area in 2022, and that this will remain static in the period up to 2025 (given the lack of forecast convenience goods expenditure growth over this period). Across the West Lancashire study area as a whole, available convenience goods expenditure is £284.0m in 2022 and remains broadly comparable in 2025. It is worth noting that Experian forecasts a substantial jump in convenience goods spending during 2020 as a result of the Coronavirus pandemic and its 'lockdown' conditions. However, Table 2(d) shows that this food spending is anticipated to consequently level out over the period between 2021 and our test year in 2025.

7.22 Meanwhile, Table 10d of Appendix IV confirms that there is approximately £136.9m of comparison goods expenditure within the defined Primary Catchment Area in 2022 and that this will increase to £146.9m by 2025. This represents three years growth of £10.0m. Turning to the West Lancashire study area as a whole, this generates a total of £368.4m of comparison goods expenditure in 2022, increasing to £395.3m in 2025. This represents comparison goods expenditure growth across West Lancashire as a whole of £26.9m over the three-year period to 2025.

Existing Shopping Patterns and Expenditure Apportionment (Table 3 and 4)

7.23 Table 3 of Appendix IV presents the findings of the West Lancashire Retail Study's 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% (£28.4m) of all convenience goods expenditure in Skelmersdale (Zone 3b) and 25.7% (£9.9m) 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 £13.1m (2022). 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 £22m) leaking from this zone to facilities in Burscough, Ormskirk, Sefton and Wigan. Indeed, it is noted that some 5.5% (over £4m) of the convenience expenditure generated in Skelmersdale (Zone 3b) is actually leaking to Aldi foodstores in other zones (Ormskirk town centre and Ringtail Retail Park, Burscough). This suggests that the existing undersized Aldi store in Skelmersdale is not meeting customer expectations and that any new 'full-offer' store

would result in the clawback of much of this leaking expenditure to more distant Aldi stores elsewhere.

- 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 undersized store in Skelmersdale is not meeting customer expectations.

7.24 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 survey derived town centre convenience turnover of £63.3m in 2022 (i.e. making no allowance for inflow from outside the study area).

7.25 However, there is also evidence of considerable convenience goods leakage from Skelmersdale to surrounding settlements (over £20m / 30% of Zone 3b convenience expenditure) 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 3a), with many residents of this zone currently appearing to bypass Skelmersdale and travel further afield for their convenience goods shopping.

7.26 Finally, the survey shows that some 5.5% of the Skelmersdale's convenience goods expenditure (Zone 3b) already flows to Aldi foodstores elsewhere in Ormskirk and Burscough, largely in the form of 'main' food shopping trips. Skelmersdale residents are found to already be spending £4.2m (2022) of their convenience goods expenditure in these Aldi foodstores and logic therefore suggests that the introduction of a new, 'full-offer' Aldi at High Street / Westgate will largely result in these shopping trips being diverted to a more local Aldi facility. In other words, a notable proportion of the impact of the proposed foodstore will inevitably fall on existing Aldi stores – resulting in the 'claw-back' of convenience expenditure to the Skelmersdale area.

7.27 Table 4 replicates the outputs of Table 3 ('Convenience Goods Shopping Patterns') but projected forwards to our test year of 2025. The key difference is that this table also makes an allowance for inflow expenditure from outside the West Lancashire Retail Study area. An inflow rate of 2.5% is assumed in the convenience goods capacity assessment prepared as part of the West Lancashire

Retail and Leisure Study 2018. However, there are two shopping destinations within the catchment area where we consider this is likely to be higher and this has been accounted for in Table 4 accordingly. Firstly, we note from the Wigan Retail Study (2014) and the St Helens Retail Study (2018) that a combined £5m+ flows to Asda, Skelmersdale from postcode sectors beyond those which are consistent with the West Lancashire Retail Study (largely in the Orrell/Pemberton and Rainford areas). This represents expenditure which the West Lancashire Retail Study cannot account for given its zones and in our view it is therefore appropriate to assume that at least 10% of this Asda store's turnover (equating to some £4m) will take the form of inflow convenience expenditure.

- 7.28 Furthermore, it is considered sensible to assume that 10% rather than 2.5% of the turnover of facilities in Up Holland Village Centre will take the form of inflow convenience expenditure. This is because the centre lies on the very south-eastern periphery of the West Lancashire Study Area and there will inevitably be some day-to-day inflow from the Orrell area, given that this settlement and Up Holland are very closely linked in terms of the local road network.

Convenience Goods Commitments and Turnover (Table 5)

- 7.29 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 (rebased to 2019 prices) and have been projected forwards to the test year of 2025 using Experian forecast sales densities from Figures 4a and 4b (Page 14) of Experian Retail Planner Briefing Note 18 (October 2020) (Latest available at the time of preparation).
- 7.30 With regards the 'Tawd Valley' town centre redevelopment scheme in Skelmersdale, the convenience floorspace figures have been taken from the retail impact assessment that was prepared in support of it (Ref. 2018/0898/FUL, approved Sept 2019). However, the sales densities have been changed to reflect Lidl and B&M, who are now the confirmed end users of this scheme. These sales densities are sourced from Mintel 2021 UK Retail Rankings (in 2019 prices).

Convenience Goods Trade Draw and Allocation – Aldi (Tables 8a and 8b)

- 7.31 We set out firstly below the estimated trade draw and allocation figures for the proposed Aldi foodstore as these are of greatest relevance to the determination of this planning application. However, it should be noted that chronologically our RIA introduces both the Tawd Valley scheme and other convenience retail commitments (within Zones 2a and 2b) prior to Aldi, in view of the fact that they are either committed or constructed developments.

- 7.32 The proposed Aldi store's convenience goods trade draw and allocation is set out in Tables 8(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 / AY observations), geographic location (proximity) and brand loyalty factors.
- 7.33 In terms of trade draw, Table 8(a) shows that a significant 90% of the scheme's convenience goods turnover will come from the population residing within what we have defined as the Primary Catchment Area ('PCA') 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. Furthermore, within this PCA the vast majority of the foodstore's trade (i.e. 70% of this 90% figure) will come from Zone 3b itself. A small amount of the foodstore's trade is anticipated to be drawn from Study Zone 2a (5%) and 2b (5%), again reflecting the shopping patterns of existing foodstores in Skelmersdale.
- 7.34 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.
- 7.35 With regards convenience goods trade allocation, Table 8(b) shows that, having apportioned the store's anticipated trade across four study zones in the test year of 2025 based on existing shopping patterns and other factors, the majority of its turnover (23% / £2.73m) 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.
- 7.36 This diversion will be closely followed by a significant 19% (£2.24m) of the proposed Aldi foodstore's trade being diverted from their existing foodstore at the Concourse Shopping Centre in Skelmersdale. It stands to reason that a substantial proportion of this existing Aldi foodstore's trade will be redirected to both the Tawd Valley Centre's forthcoming Lidl store and a new Aldi at High Street. However, it is considered that the existing store's niche role and function as an important 'top-up'

food shopping destination within the Concourse means that it will retain a proportion of its customer base, even following the opening of Aldi's 'full-offer' High Street store.

- 7.37 The next highest diversion is anticipated to be from the Aldi foodstore at Ringtail Retail Park (10.9% / £1.3m 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 more modern, larger, closer Aldi facility at High Street in Skelmersdale will 'claw-back' a proportion of this leaking expenditure. Indeed, £3.34m of convenience expenditure already flows from Zone 3b (Skelmersdale) to Aldi, Burscough and it is not therefore unreasonable to assume that at least 50% of that will be 'clawed-back' to Aldi, High Street.
- 7.38 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, 2.2% of Aldi's turnover will be diverted from Iceland, Concourse Shopping Centre and 4.0% 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 from by an Aldi foodstore.
- 7.39 It has been assumed that 6.3% of the proposed Aldi foodstore's trade will be diverted from the Tawd Valley town centre scheme in Skelmersdale. This is reflective of the fact that this is being anchored by a Lidl foodstore which will inevitably compete on a 'like-affects-like' basis with Aldi (and vice versa).
- 7.40 Overall, it can be seen from Table 6b that the proposed Aldi foodstore will divert in the order of **57.5%** 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%. Furthermore, in Zone 3b leakage stands at 30% of available expenditure. A new Aldi will therefore act to reduce this, particularly in terms of leakage to other Aldi stores in Burscough and Ormskirk.
- 7.41 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 (Zone 3b), we have assumed that the foodstore will 'claw back' some £2.7m of convenience goods expenditure which is currently leaking to facilities outside the settlement (i.e. beyond Zone 3b). This is robust as £4.2m currently leaks from this zone to Aldi foodstores in Ormskirk and Burscough alone. 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 £4.1m of convenience goods expenditure.

Convenience Goods Trade Draw and Allocation – Commitments (Tables 6a, 6b, 7a and 7b)

- 7.42 With regards the town centre redevelopment scheme in Skelmersdale Town Centre (the Tawd Valley Centre), we have assumed identical trade draw assumptions to the proposed Aldi foodstore at High Street (see Table 8a). 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). 90% of the Lidl foodstore's trade is therefore forecast to be drawn from the PCA (Zones 3a and 3b)
- 7.43 We have also made very similar assumptions to the Aldi store when considering the trade allocation of the Lidl store, as highlighted in Table 6b. This is simply because it stands to reason that a comparable discount foodstore serving the same catchment will logically have a broadly equivalent sphere of influence over shopping patterns (resulting in comparable impacts). Notwithstanding this, it has been assumed that the Lidl store will divert a greater proportion of its trade from Asda, Ingram Road, given its very close proximity and equivalent accessibility for those travelling by car (with both served by sizable car parks off the same roundabout junction).
- 7.44 For robustness, it has not been assumed that the proposed Lidl at Tawd Valley will divert any of its trade from the proposed Aldi at High Street. This is because the Lidl foodstore will arrive in advance of Aldi, High Street. Instead a notable proportion of the Lidl's turnover will be diverted from the Aldi store in the Concourse Shopping Centre (19% / £2.2m). However, it is considered that the existing Aldi store's niche role and function as an important 'top-up' food shopping destination within the Concourse means that it will retain a proportion of its customer base, even following the opening of the Lidl store nearby.
- 7.45 In terms of remaining committed developments (i.e. those in Zones 2a and 2b), 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.

Convenience Goods Trading Impact (Table 9)

Centres other than Skelmersdale

- 7.46 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.
- 7.47 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 less than 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.
- 7.48 Table 9 shows that once all commitments are allowed for, impacts upon centres outside Skelmersdale understandably increase, with both the Tawd Valley 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 only 8.7%, whilst the impact on Ormskirk is just 8.8%.
- 7.49 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).
- 7.50 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.

7.51 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

7.52 With regards quantitative convenience goods impacts upon foodstores and other shops within and surrounding Skelmersdale, these are focussed upon in detail in Table 9 of our retail impact assessment (Appendix IV). Firstly, in terms of the **solus (scheme specific) convenience goods impacts** of the Aldi foodstore, with the exception of Aldi’s Concourse centre store itself, it can be seen that these are relatively modest in scale upon all other identified facilities. For example, as Table 7.1 below highlights, the Aldi would result in a 6.6% impact upon the Asda store on Ingram Road. However, this would equate to just £2.7m of the scheme’s significant pre-cumulative £45m turnover (which is nearly four times greater than that of a discount foodstore).

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	-6.6%	-14.3%
Aldi, Concourse Centre, Skelmersdale Town Centre	-30.2%	-46.0%
Iceland, Concourse Centre, Skelmersdale Town Centre	-8.7%	-15.8%
Other, Skelmersdale Town Centre	-4.9%	-9.2%
<i>Tawd Valley Centre (Lidl and B&M), Skelmersdale Town Centre</i>	-6.3%	+93.7%
Total Skelmersdale Town Centre	-8.8%	-1.7%
Other, Zone 3b	-4.9%	-9.2%

Note. Total Skelmersdale Town Centre ‘cumulative impact’ is reflective of the uplift in turnover generated for the town centre by the Tawd Valley Centre scheme as well as the trade diversion associated with both it and the Aldi foodstore proposals.

7.53 The solus convenience goods impact upon the Iceland at the Concourse Shopping Centre would be less than 9% of its pre-impact turnover (£3.2m). Similarly, impact upon the other convenience shops in the town centre (largely within the Concourse Centre) will be just 5% (£0.5m) – reflecting the fact that these smaller shops largely meet top-up food shopping needs as oppose to the proposed Aldi

store's bulk food shopping offer. In quantitative terms neither of these impacts can be regarded as 'significant adverse' in or view, given their magnitude. We discuss the qualitative side of Aldi's impacts in the subsequent section.

- 7.54 In terms of the Aldi store's trading effects upon the Tawd Valley town centre redevelopment scheme, Table 7.1 above suggests a convenience goods impact of 6.3% on the scheme (i.e. Lidl and B&M Bargains) in 2025. It is important to highlight that following this impact the town centre redevelopment proposals would still benefit from a convenience goods turnover of some £11.2m and a comparison goods turnover of some £15m in 2025 (turnover based on the 2019 planning permission, Ref. 2018/0898/FUL).
- 7.55 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. It would be entirely unaffected by the proposed trade counter unit, given that this will operate as a builders merchant (Toolstation). If the Tawd Valley Centre 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 2.8%.
- 7.56 Finally, with regards the proposed Aldi foodstore's solus trading impact on the Concourse Centre's existing Aldi foodstore, it is acknowledged that a trading impact of some 30% is anticipated – reflective of the fact that a proportion of the store's existing customer base will migrate to a larger, more modern store at High Street. However, Aldi are of the view that the store still has a role to play in the town centre as a 'top-up' food shopping destination within the Concourse and that it will retain a proportion of its customers – particularly those who are loyal to the brand and who shop regularly within the Concourse. Accordingly, despite the relatively high solus trading impact figure anticipated, Aldi are proposing to retain their Concourse Centre store, should a new Aldi store open at Westgate.
- 7.57 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 proposed Aldi and Tawd Valley Centre's** trading effects alongside one another. This is set out in the third column of Table 7.1 on the preceding page and Table 9 of Appendix IV.
- 7.58 Looking firstly at the Asda on Ingram Road, it is evident that the cumulative impact of Aldi and all commitments on this store will be 14.3% (equating to £6.4m of its convenience goods turnover). However, this must be set in context. 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 2,545 sq. m of such floorspace. Applying Asda's current benchmark sales density of £13,658 per

square metre to this convenience goods floorspace (Source: GlobalData 2020, 2019 prices) generates a company average convenience goods turnover of some £35m. 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 (and making an appropriate allowance for inflow), the Asda store generates a convenience goods turnover of some £45m. Accordingly, evidence would suggest that the foodstore already trades well above benchmark levels (i.e. in the order of +£10m) and this is hardly surprising as the largest foodstore in West Lancashire.

7.59 In summary, the Asda foodstore in Skelmersdale town centre is already trading well above benchmark levels and the West Lancashire Retail Study (2019) shows that it 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 -14% based on the introduction of the Tawd Valley Centre and the proposed Aldi foodstore, it cannot be suggested that the Asda foodstore will suffer a '*significant adverse*' impact upon its trade and turnover and there is no prospect of closure.

7.60 In the case of cumulative impact on the existing convenience goods facilities within Skelmersdale's Concourse Centre, it acknowledged that cumulative impact on the existing Aldi store in particular is high (-46% of current turnover). Indeed, this accounts for 75% of all anticipated trade loss from the convenience retail facilities within the Concourse centre. However, it is important to put this quantitative impact figure into perspective in that:

- At least half of the trade which is forecast to be diverted will be redirected to the Tawd Valley Centre, which is equally a key part of Skelmersdale town centre. This is not therefore expenditure lost from the centre but redistributed to other retailers in the same centre; and,
- Aldi have been clear as part of this application that they are not proposing to close their Concourse Centre store should a new one open at High Street. Whilst its turnover will therefore inevitably be affected by the introduction of new Aldi and Lidl stores, this is ultimately Aldi's commercial problem rather than that of any other party. The Concourse Centre Aldi store's retention will mean no reduction in consumer choice and competition within the centre.

7.61 In assessing the quantitative convenience goods impact upon Skelmersdale town centre as a whole, Table 7.1 (and Table 9 of Appendix IV) shows that, overall, whilst in combination the Tawd Valley Centre and Aldi, High Street will divert some £13m of convenience goods expenditure from the centre, the Tawd Valley Centre scheme itself will increase the convenience goods turnover of the centre by some £12m. **The overall absolute cumulative retail impact on the centre as a whole**

will therefore be -1.7% or -£1.2m. In our view, these quantitative cumulative effects cannot be regarded as significant adverse in nature because:

- The majority of the trade to be diverted from the centre will be from an Asda superstore which is the largest in West Lancashire and draws the greatest proportion of all convenience goods shoppers in the Borough, based on the Council's latest Retail Study. This superstore trades above benchmark levels based on our analysis and has no prospect of closure;
- The foodstore which will suffer the second greatest trading effects will be Aldi's Concourse Centre store. However, Aldi now intend to retain this store and, as such, there will be no consequential reduction in consumer choice and competition in the town centre following the cumulative impacts forecast;
- The Tawd Valley Centre scheme will result in a dramatic redistribution of convenience retail trade within the town centre – with much of this transferred from an over-performing Asda superstore to a new Lidl discount foodstore (via trade diversion). This is a key reason why the future turnover of the Tawd Valley Centre scheme will not result in dramatic increase in the town centre's convenience turnover. However, it is important not to lose sight of the fact that consumer choice and competition will be dramatically improved, with the town centre represented by Asda, Lidl, Aldi, Iceland and B&M in terms of convenience goods retailing options.

7.62 By way of conclusion on convenience goods quantitative impacts, our position is that the solus trading effects of an Aldi foodstore at High Street, Skelmersdale simply would not result in any 'significant adverse' impacts upon trade and turnover on either Skelmersdale town centre or indeed any other defined centre. This is in particular given that Aldi intend to retain their Concourse Centre foodstore should permission be granted, thus ensuring no reduction in consumer choice and competition in the town centre. However, it is also reflective of the Aldi store's relatively limited size and turnover in the context of a town centre which, as a whole, already currently has a combined convenience goods turnover of some £67m.

7.63 Whilst the Tawd Valley Centre scheme inevitably complicates the quantitative impact picture, particularly in relation to cumulative effects, the reality is that the existing Asda superstore will suffer the greatest cumulative impacts, rather than smaller traders. This is a store which already performs exceptionally strongly and is of a magnitude whereby its long-term viability simply will not be affected. The reality is therefore that whilst the town centre's convenience goods turnover may not grow dramatically as a consequence of the Tawd Valley scheme's introduction, consumer choice and competition will – which in turn has the potential to further the centre's 'vitality and viability' as a

whole. On this basis there will not be a 'significant adverse' impact on Skelmersdale town centre on account of the cumulative effects modelled.

Comparison Goods Trading Impact (Tables 10 and 11)

- 7.64 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.
- 7.65 With regards the trade counter unit ('Toolstation'), as a builders merchant all of its trade is anticipated to be diverted from equivalent 'out-of-centre' facilities rather than town centre locations. Indeed, we note that a number of such businesses already operate within Skelmersdale's existing industrial areas and along the M58 corridor more generally. Accordingly, it is not considered relevant or necessary to examine the trade counter unit's very modest comparison goods turnover (circa £1.3m) any further. The applicant would welcome a subsequent discussion in relation to restricting the trade counter unit to a builders merchant use and limiting the trading floorspace therein.
- 7.66 From a quantitative perspective, Table 1 of Appendix IV demonstrates that the Aldi store's comparison goods turnover is anticipated to be just £2.8m in 2025. However, to put this into context, Table 11 demonstrates that the scheme's comparison goods turnover equates to just 0.7% of the total available study area comparison expenditure in 2025 and just 10% of the forecast growth in comparison goods expenditure in the Study Area between 2022 and 2025. Even if the Primary Catchment Area alone is assessed, Table 11 shows that the scheme's comparison goods turnover equates to just 1.9% of the population's total comparison goods expenditure and only 27.7% of the anticipated growth in comparison goods expenditure in the Primary Catchment Area between 2022 and 2025. In short, Aldi's comparison goods turnover represents a very small percentage of both available expenditure and even the anticipated future growth in expenditure.
- 7.67 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.

- 7.68 Notwithstanding this, a simple impact assessment is set out in Table 11 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 Aldi'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 4.8%. 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.
- 7.69 Indeed, the subsequent tables set out under Table 11 test an uplift in Skelmersdale town centre's comparison goods market share, which is the intended objective of the Tawd Valley 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 2025 would be reduced to 3.4%. Furthermore, if the comparison goods market share increased to 15% following the introduction of the Tawd Valley scheme then the Aldi store's impact on Skelmersdale town centre would reduce to 2.3% in 2025. 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

- 7.70 In addition to the quantitative analysis which has been undertaken, there is merit in setting out the qualitative factors which underline why an Aldi foodstore (the core component of the mixed-use development proposed) will not result in a 'significant adverse' impact on the 'vitality and viability' of Skelmersdale town centre or indeed any other surrounding centres (such as Sandy Lane local centre).
- 7.71 There are some key themes to outline in relation 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 (such as Skelmersdale's Asda) and other smaller convenience retailers (such as Sandy Lane local centre's Co-op) 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, dispensing pharmacy, dry-cleaners, travel agent, betting office, 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 Sandy Lane local centre, for example, for the vast majority of their specialist food retail (i.e. butcher), retail service, and leisure needs. The nearby local 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 extremely 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 all year-round. Accordingly, Skelmersdale town centre will remain the primary shopping destination for Skelmersdale residents when it comes to purchasing non-food goods.

Overall Implications for Vitality and Viability of Surrounding Centres

- 7.72 Whilst the preceding section has set out the quantitative impact on surrounding centres as a consequence of the development proposals, in considering what this will actually mean for their vitality and viability, it is important to provide a proportionate commentary on their current health, role and function. This is bearing in mind the fact that the Practice Guidance states that the judgement as to whether likely adverse impacts are 'significant' can only be reached in light of local circumstances (Town Centres and Retail, Paragraph 18 (Reference ID: 2b-018-20190722)). The implication being that where a centre is in good health it will be well placed to withstand modest trading impacts without these resulting in a '*significant adverse*' impact on overall vitality and viability.
- 7.73 Accordingly, **Appendix VI** of this Statement presents detailed health check assessments of Skelmersdale town centre and Sandy Lane local centre. These health checks are summarised for the purposes of this Statement below:

Skelmersdale Town Centre – Health Check Analysis

- 7.74 Skelmersdale Town Centre serves the largest urban area within West Lancashire and, together with Ormskirk and Burscough, is identified as a '*first tier town centre*' by Policy IF1 of the West Lancashire Local Plan. Based Avison Young fieldwork in November 2021, the centre currently benefits from some 95 units in total. This includes a considerable number of national multiple retailers (many of which are accommodated in the Concourse Shopping Centre) alongside a range of independent operators and a permanent covered market (again within the Concourse). The largest unit is a freestanding Asda superstore of some 7,900 sq. m gross floorspace.

- 7.75 However, the centre is evidently more than just a shopping and leisure destination and plays a key role within West Lancashire's wider economy, providing a wide range of important civic, transportation and educational facilities. For example, the town centre is home to West Lancashire College, various civic buildings occupied by West Lancashire Borough Council (amongst others), a police station, and an important local bus station / transport hub.
- 7.76 Skelmersdale town centre is also currently in a period of transition. A significant town centre extension scheme has been constructed and opens in Spring 2022. The first phase of the 'Tawd Valley Centre' will deliver a Lidl foodstore, B&M Homestore and a further non-food retail unit, all served by several hundred new surface level car parking spaces. Further phases of the scheme (which already benefit from outline planning permission) would see delivery of a new 'high street' linking the Concourse Shopping Centre with West Lancashire College's campus. This would provide a range of smaller-scale shops, bars, restaurants and a new six-screen cinema.
- 7.77 With regards diversity of use, the proportion of convenience and comparison goods units in the town centre is above the national average position, at 12.6% and 30.5% respectively. Both of these sectors are an important strength of the town centre and a wide range of national multiples are present, including: JJB Sports, Argos, Boots, Specsavers, New Look, Superdrug, CEX, Card Factory, Peacocks, Home Bargains, Poundland, Wilko, Aldi, KFC, Asda, McDonalds and Iceland (amongst others).
- 7.78 In terms of vacant units, whilst it is acknowledged that the first floor of the Concourse has suffered from a relatively high vacancy rate for a number of years, this must be set in the context of the fact that Skelmersdale town centre as a whole only has an overall vacancy rate (17.9%) which is just 3.7% above the national average position (14.1%). Furthermore, we are of the view that there are contributing factors to the location and type of vacancies identified in the Concourse. This is given their 100 sq. m – 400 sq. m size (which is unlikely to appeal to small independent retailers) and the fact that the first floor is unlikely to be of interest for the important 'leisure service' sector (given the operational hours of the mall itself – which preclude night-time trading).
- 7.79 The reality is that Skelmersdale town centre is in a period of transition. There is no longer demand for some of its units given their outmoded formats, which are best suited to multiple food and non-food retailers. It therefore seems inevitable that units will remain vacant on the first floor of the Concourse Centre, unless reconfiguration takes place to enable the diversification of some of the available space away from typical multiple-retailer floorplates and towards smaller independent occupiers and different uses. It is also considered that measures need to be taken to encourage more leisure service uses on the first floor (perhaps through longer mall operational hours). Leisure services would typically account for some 25% of units in a traditional town centre (based on the current GOAD

national average). The fact that this sector is so underrepresented in the Concourse is therefore undoubtedly a contributing factor to the current first floor vacancy rate.

- 7.80 The vacancy level in parts of the Concourse must be viewed in this context and, with a major regeneration scheme being progressed in the town centre (the Tawd Valley Centre) and much of its existing floorspace being occupied by multiple retailers, our conclusion is that whilst Skelmersdale clearly has its challenges it can be regarded as a relatively healthy, well-used and popular town centre. In our view, the majority of its key health check indicators point towards it being 'vital and viable' at the present time.

Sandy Lane Local Centre – Health Check Analysis

- 7.81 The shops and services at Sandy Lane are defined as a 'Small Local Centre', according to Policy IF1 of the West Lancashire Local Plan 2012 - 2026 (2013). It can best be described as a purpose built shopping precinct, which was designed and built as part of Skelmersdale's new town designation in the 1960/70's. The pedestrianised precinct contains some 17 retail units at ground floor level, whilst the first floor level (which is not accessible to the public) largely comprises storage space and offices.
- 7.82 Sandy Lane is evidently a diverse, well-used local centre which provides a good range of services that are suitable to serve the 'day-to-day' smaller-scale needs of the surrounding walk-in catchment area. The proportion of convenience and retail service uses are higher than the national average positions. This is reflective of the centre's role in meeting 'top-up' food shopping needs and daily demand for services.
- 7.83 Sandy Lane has a mixed environmental quality, with shop units generally well-maintained but the 1960's precinct itself now tired and in need of investment. Meanwhile, access is good via a variety of means (including public transport) and the centre also appears to benefit from a sizable walk-in catchment area from surrounding high-density residential areas. Two free-of-charge car parks (located off Sandy Lane) which serve the centre are well used and are clearly of considerable benefit to its overall performance.
- 7.84 Finally, in terms of vacancies (a key health check indicator), importantly no vacancies were identified on our visit to the centre in November 2021. This compares particularly favourably with the national average position of some 14.1% of units in each centre being vacant. Sandy Lane therefore has a vacancy rate well below average, and this is a strong indicator that it is a healthy, well-used and popular centre.

- 7.85 Drawing the above analysis together, the evidence suggests that Sandy Lane local centre plays an important role in meeting the day-to-day retail and service needs of the surrounding residential population. The centre unquestionably shows strong signs of 'vitality and viability' and can be regarded as healthy at the present time. This is emphasised by the fact that none of the ground floor units in the centre are currently vacant.

Overall Implications for Vitality and Viability of Surrounding Centres – Conclusions

- 7.86 The detailed Health Check assessments presented at Appendix VI of this report demonstrate that the two centres assessed are successfully performing their respective 'role and function' and are vital and viable on this basis. In view of the fact that the level of quantitative impact on surrounding centres as a consequence of the development proposals will be relatively low, and the centres themselves appear well used and healthy, it follows that 'significant adverse' impacts are unlikely to be reached based on the local circumstances. This is having regard to the approach advocated in the Practice Guidance (Town Centres and Retail, Paragraph 18 (Reference ID: 2b-018-20190722)).

Impact on Investment

- 7.87 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).
- 7.88 In the case of Skelmersdale, there is realistically only one opportunity that requires assessment, this being the Tawd Valley Centre town centre redevelopment scheme. As explained elsewhere in this Planning and Retail Statement, the Tawd Valley 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.
- 7.89 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 992 sq. m GIA / 764 sq. m net.

- 7.90 The Planning and Retail Statement which supports the Section 73 application (Ref. 2018/0897/FUL) is 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 992 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.
- 7.91 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.
- 7.92 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). Indeed, this is confirmed by St Modwen's marketing particulars for the scheme from mid-2020 (which follow this site appraisal) and outline that the developer has exchanged contracts with both Lidl and B&M.
- 7.93 We note that three further variation of condition applications were made at the site during January and February 2020 (Refs. 2019/1258/CON, 2019/1284/FUL and 2019/1285/FUL). These applications essentially involved minor design and operational amendments to ensure that the site's current planning permissions are specifically tailored to meet Lidl's corporate requirements. Indeed, the supporting letter submitted with the applications confirms that 'Lidl will be the occupier of Block D'.
- 7.94 Finally, we note that Lidl secured advertisement consent in November 2021 for fascia panels and various other signage associated with their forthcoming foodstore. This approval coincided with a press release from St Modwen Developments and their contractor Caddick Construction which confirmed that the new retail units at the Tawd Valley Centre (including B&M and Lidl) would be opening in the Spring of 2022.
- 7.95 Accordingly, there can be no doubt that the first phase of the Tawd Valley Centre scheme will be realised in early 2022, long before an Aldi discount foodstore comes forwards at High Street / Westgate. Therefore, there can be no suggestion that Aldi's proposals (which Lidl and St Modwen

have been aware of since early 2019) will result in a 'significant adverse' impact on this investment decision or the realisation of this important scheme.

- 7.96 Looking towards the future phases of the Tawd Valley Centre 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.
- 7.97 Accordingly, the discount foodstore represents less than 20% of the circa 10,000 sq. m of floorspace which is proposed as part of the Tawd Valley town centre re-development scheme, based on the outline permission. The proposed Aldi foodstore 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 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 future phases of development.
- 7.98 In summary, the first phase of the Tawd Valley town centre redevelopment scheme (involving food and non-food retail) has reached the point of completion, with end users contractually committed, and an opening date confirmed for early 2022. It cannot therefore reasonably be suggested that Aldi's planning application at High Street (which Lidl and St Modwen have been aware of since early 2019) could still result in a 'significant adverse' impact upon this investment decision or the now finished scheme not becoming operational.
- 7.99 Added to this is the fact that the vast majority of the floorspace and uses proposed as part of the Tawd Valley 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 further phases of this town centre redevelopment scheme.
- 7.100 In view of this evidence, it can be concluded that the proposed Aldi foodstore will 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 90 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 Conclusions

- 7.101 By way of conclusion on **convenience goods quantitative impacts**, our position is that the solus trading effects of an Aldi foodstore at High Street, Skelmersdale simply would not result in any 'significant adverse' impacts upon trade and turnover on either Skelmersdale town centre or indeed any other defined centre. This is in particular given that Aldi intend to retain their Concourse Centre foodstore should permission be granted, thus ensuring no reduction in consumer choice and competition in the town centre. However, it is also reflective of the Aldi store's relatively limited size and turnover in the context of a town centre which, as a whole, already currently has a combined convenience goods turnover of some £67m.
- 7.102 Whilst the Tawd Valley Centre scheme inevitably complicates the quantitative impact picture, particularly in relation to cumulative effects, the reality is that the existing 7,900 sq. m (GIA) Asda superstore will suffer the greatest cumulative impacts, rather than smaller traders. This is a store which already performs exceptionally strongly and is of a magnitude whereby its long-term viability simply will not be affected. The Tawd Valley Centre scheme will result in a dramatic redistribution of convenience retail trade within the town centre – with much of this transferred from an over-performing Asda superstore to a new Lidl discount foodstore (via trade diversion). This is a key reason why the future turnover of the Tawd Valley Centre scheme will not result in dramatic increase in the town centre's overall convenience turnover. However, it is important not to lose sight of the fact that consumer choice and competition will be dramatically improved, with the town centre represented by Asda, Lidl, B&M, Iceland, Farmfoods and a retained Aldi in terms of convenience goods retailing options. On this basis, there will not be a 'significant adverse' impact on Skelmersdale town centre on account of the cumulative effects modelled – in fact quite the opposite.
- 7.103 Our **comparison goods** impact assessment of the application proposals has shown that there will not be any 'significant adverse' impacts on Skelmersdale town centre's comparison goods sector. Added to this is the fact that comparison expenditure growth over the assessment period outstrips the turnover of the scheme, meaning that centres such as Skelmersdale will still have a higher comparison goods turnover in 2025 than they do in 2022, even allowing for the modest impact of the application proposals. Given the comparatively low comparison goods turnover of the scheme and the significantly larger size / substantially higher turnover of the comparison goods offer in Skelmersdale (which will be enhanced by the Tawd Valley centre scheme), it is clear that the application proposals will not be of any consequence in impact terms to the non-food offer of this higher order centre.

- 7.104 Turning to **qualitative impacts**, a variety of factors have been outlined in this section which emphasise why an Aldi foodstore of the scale proposed would be unlikely to impact adversely upon the 'vitality and viability' of the centres within the defined PCA. This is largely because Aldi 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.
- 7.105 Furthermore, the detailed **Health Check assessments** presented at **Appendix VI** of this report demonstrate that Skelmersdale town centre and Sandy Lane local centre are successfully performing their respective 'role and function' and, whilst both face challenges, the majority of their key health check indicators point towards them being 'vital and viable' at the present time. In view of the fact that the level of scheme specific 'solus' quantitative impact on surrounding centres will be relatively low, and the centres themselves appear well used and generally healthy, it follows that 'significant adverse' impacts are unlikely to be reached based on local circumstances.
- 7.106 Finally, with regards **impact upon investment**, the only centre and scheme which merits consideration is the Tawd Valley town centre expansion scheme in Skelmersdale. The first phase of this scheme (involving food and non-food retail) has reached the point of completion, with end users contractually committed, and an opening date confirmed for early 2022. It cannot therefore reasonably be suggested that Aldi's planning application at High Street (which Lidl and St Modwen have been aware of since early 2019) could still result in a 'significant adverse' impact upon this investment decision or the now finished scheme not becoming operational.
- 7.107 Added to this is the fact that the vast majority of the floorspace and uses proposed as part of the Tawd Valley scheme (80%) are not in any way convenience goods focussed and will not be affected by Aldi's introduction at High Street. Aldi's discount foodstore proposal will therefore evidently not have a '*significant adverse*' impact upon the deliverability of the further phases of this town centre redevelopment scheme.
- 7.108 Drawing all of the impact analysis set out within this section of the report together, it is clear that there will be no conflict with Paragraph 90 of the NPPF and the scheme is also considered to accord with the local retail impact test set out Policy IF1 of the West Lancashire Local Plan (2012 – 2027).

8. Other Planning Policy Matters

8.1 purpose of this section is to assess the application proposals in the context of all remaining relevant planning policy and guidance at the national and local level.

Employment Land Policy

8.2 The relevant employment land allocation for the application site is the West Lancashire Local Plan (2012-2027) Policy EC1.2(b)(i.) which allocates it as falling within an 'Other Significant Employment Site', specifically "i. Westgate, Skelmersdale". The policy explains that within these locations the Council will permit B1, B2 and B8 uses (as was prior to the Use Class changes in September 2020).

8.3 Policy G4 sets out the Local Plan's employment land protection policy. The Policy states that employment land will be retained for this purpose, unless it can be demonstrated that one of the following tests has been met:

- It is not commercially viable to redevelop the land for its existing use. It will also need to be demonstrated that there is no realistic prospect of a mixed-use scheme for the existing use and compatible use; or,
- The land is no longer suitable for the existing use when taking into account access / highways issues, site location, physical constraints, environmental considerations, etc; or,
- Marketing of the land indicates that there is no demand for the existing use.

8.4 The applicant's justification in relation to this policy test is set out in detail as part of a supporting Employment Land Market Report, prepared by Aherne Property Consultants Ltd. However, by way of a brief summary of the report's findings in the context of Policy G4's requirements:

Commercial Viability

8.5 A detailed development appraisal which has been prepared as part of the Employment Land Report shows that even based on the most relevant and potentially profitable employment scheme for the site, it would still produce a loss of some £1.73m. The report therefore concludes that in light of the scale of the deficit associated with bringing this site forward purely for employment uses, the prospects of it coming forward in the foreseeable future is very unlikely – particularly when considering the site has been marketed since 2016.

8.6 Whilst the Employment Land Report finds that it is not commercially viable to redevelop the land purely for employment purposes, it does point out that the scheme will represent a mixed-use development comprising a traditional 'employment' use – an objective of Policy G4 in circumstances where a traditional employment scheme is not viable. The scheme will deliver a 372 sq. m Use Class B8 trade counter for which builders merchant Toolstation are identified as the end user. The scheme will therefore result in provision of a deliverable employment use on the site, in line with local planning policy.

Site Suitability

8.7 In relation to Policy G4's second bullet point, the Employment Land Report describes how the site's characteristics do not meet the necessary requirements to attract employment uses. These are summarised in turn below:

- **Access/Highways** – Westgate is a minor road which services Westgate Commercial area, High Street, and Waldron Road. The latter are residential streets and Westgate itself is a minor street. The road is not particularly well suited to HGVs and the junctions at either end of Westgate are mini roundabouts again not well suited to HGV movements. Excellent access via HGV would be a pre-requisite for any logistics investor.
- **Location** – Westgate is located on the eastern fringe of Skelmersdale relatively remote from the main employment areas of Gilibrands, Pimbo and Stanley all of which have better dual carriage way and motorway access. Furthermore, our audit of the Westgate Employment area adjacent demonstrates that this contains an eclectic mix of relatively low grade retail, leisure and commercial uses as oppose to being focussed on traditional office, industrial or logistics sectors. Accordingly, there is no evidence to suggest the location would be particularly attractive to traditional employment uses, based on the nature of the wider Westgate Employment area.
- **Physical constraints** – The site is irregularly shaped to the Eastern boundary and slopes form North to South so is not well suited to employment development, which requires level and regularly shaped sites to enable the most efficient and economical development.
- **Environmental considerations** – the site is in close proximity to housing on three boundaries. Housing to the East and South come right up to the boundary and would therefore be in very close proximity to the industrial uses. Industrial and particularly logistics and last mile delivery often require 24/7 hours of operation or at least very early starts and late evening operation. This activity increases out of hours traffic movements and noise which will be a clear detriment to the residential and potential for nuisance and environmental health.

Demand

- 8.8 In relation to the final bullet point concerning marketing, the Employment Land Report confirms that the High Street site has been marketed for several years and that this has been led by leading commercial property agents, Mason Owen, who are specialists in industrial and office accommodation in the North West. The marketing initiatives employed are set out in detail in the Employment Land Report. Aherne Property Consultants are of the view that the marketing activities undertaken represent an adequate level of marketing for a sustained period of time and provides sufficient feedback from the market place to establish there is no potential for employment development on this site.

Conclusion

- 8.9 Drawing the above analysis together, whilst Policy G4 only requires one of its three identified 'tests' to be passed, it is our view that all three can be met. The site is not commercially viable even for the most relevant and potentially profitable employment scheme. It also has a series of suitability constraints which would preclude the use of the site for various forms of employment development – particularly logistics. Finally, there is no evidence of demand for the site to be used solely for traditional employment purposes. Various marketing exercises have been undertaken since 2016 by leading agents for a sustained period and none have resulted in interest from employment users.
- 8.10 The Employment Land Report therefore concludes that the planning application site will remain derelict and has no foreseeable prospects of coming forwards solely for its allocated use. The mixed-use application proposals will have a positive impact by providing new investment and much needed retail employment, together with an element of 'employment accommodation' in the form of a deliverable trade counter unit which is more suited to this location (as reflected in the comparable trade counters within the wider Westgate Industrial area). Overall, no conflict with Policy G4 of the Local Plan is therefore anticipated.

Transportation and Access

- 8.11 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.

- 8.12 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.
- 8.13 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.
- 8.14 In total, 140 car parking bays are proposed, with 9 disabled bays, 11 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.
- 8.15 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.

Arboriculture

- 8.16 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.
- 8.17 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.
- 8.18 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.
- 8.19 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. This will involve the provision of 35 new trees, as well as shrub and grass planting. Accordingly, it is considered that the scheme has the potential to enhance tree coverage across the site when compared to the current position.

8.20 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

8.21 An Ecological Appraisal of the site was undertaken by Bowland Ecology in July 2021. 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.

8.22 In terms of site habitats, the appraisal comments that the majority of the site is dominated by hardstanding, with small areas of unmanaged amenity grassland also present, alongside several scattered mature and semi-mature trees.

8.23 In terms of the species present on the site, no evidence of roosting bats was observed during the latest site survey of July 2021. A single rowan tree and a small substation building both offer limited features which have very low suitability for roosting bats. If works to these features occur during the bat active season, there is a very low risk of causing disturbance and / or injury to bats, if present. As such, Reasonable Avoidance Measures (RAMs) described in the report will be adhered to during any works to the substation and tree.

8.24 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.

8.25 In terms of the report's recommendations, for bats it states that a precautionary approach to demolition and tree removal is recommended. 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.

8.26 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.

8.27 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.

8.28 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

8.29 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.

8.30 The Site lies wholly within Flood Zone 1 and extends to c.1.24ha.

8.31 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.

8.32 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

8.33 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.

8.34 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.

8.35 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 and Built Environment

8.36 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 Westgate, 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.

8.37 With regards to use, the proposed development is for a Use Class E foodstore with a sales area of 1,315sq.m and an additional trade counter unit (Use Class B8) of 372sq. m. The function of the foodstore necessitates dedicated car parking, servicing and ancillary landscaping and access.

8.38 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. 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.

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

8.40 In summary, the proposed foodstore and trade counter unit will be of a contemporary design with a strong horizontal emphasis and constructed using modern methods and materials. The buildings will

be of steel framed construction and will incorporate, in addition to extensive glazing, high-quality two-tone cladding to provide a clean, modern finish. This materials palate is very much reflective of the architectural aesthetic of surrounding commercial buildings already apparent in the locality. Such a design philosophy, drawing upon a simple palate 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.

Sustainability

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

Landscaping

8.42 A considered landscaping scheme composed of 35 new 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.

8.43 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

8.44 The proposed discount foodstore 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.

- 8.45 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.

Overview

- 8.46 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. Summary and Conclusions

Overview

- 9.1 This Planning and Retail Statement has been prepared on behalf of Aldi Stores Limited in support of a 'full' planning application which seeks permission for the erection of a discount foodstore (Use Class E) and a trade counter unit (Use Class B8) with associated access, car parking, servicing area, and hard and soft landscaping on land that the corner of High Street and Westgate 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. It was until recently occupied by a 1960's office building until its enforced demolition in 2021 following an arson attack. The office building was vacant at the time of its demolition and had been since 2016, following the departure of its long-term tenant the Co-operative Group. The building had fallen into disrepair in recent years after extensive efforts to find an alternative office occupier failed and it became an ongoing target for vandalism, break-ins, and anti-social behaviour.
- 9.3 Today the site continues to offer a poor impression of the area. It is largely hoarded off from the public and comprises only the building slab and unmanaged self-seeded vegetation. 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 important site, whilst also creating 40 to 50 full and part-time jobs and enhancing consumer choice within western Skelmersdale – where there currently is no 'main' food shopping destination. The scheme will also facilitate the delivery of a trade counter use (Use Class B8) on a site which is allocated for employment purposes in the Local Plan. This trade counter will create a further 10 to 15 local jobs.
- 9.4 The rationale for Aldi submitting this planning application is that the retailer cannot adequately serve Skelmersdale (a sizable town of some 40,000 people) from their existing store within the Concourse Shopping Centre in Skelmersdale town centre. This is both due to the store's limited size (which has a sales area one third less than Aldi's current foodstore format) and inherent operational constraints associated with the Concourse Centre itself. These include there being no dedicated surface level car parking within easy reach of customers using trolleys – critical for those undertaking a 'bulk' food shopping trip – and reduced operational hours, dictated by the trading hours of the shopping centre.
- 9.5 Accordingly, Aldi's objective is to bring their latest discount foodstore format to Skelmersdale so that they can better meet the needs of Skelmersdale residents from a store which is capable of providing Aldi's full food offer. However, they are also proposing to retain their Concourse Centre store (where

the current lease runs until the end of 2025), so that there would be no consequential reduction in consumer choice and competition within the town centre should a new Aldi store open at Westgate.

- 9.6 The location Aldi has selected for its new 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 17 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 fully 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.

Policy Compliance

- 9.7 This Planning and Retail Statement has considered the application proposals against the relevant policies contained within West Lancashire's development plan, as well as other material considerations including national planning policy guidance. Specific consideration has been given to employment land policy, the retail impact test, and the sequential test of the Local Plan and NPPF, which are considered to be the '*main planning issues*' in this case. We summarise the applicants' conclusions in relation to each of these key matters below:

Sequential Test

- 9.8 The sequential assessment set out in Section 6 (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.
- 9.9 For the reasons outlined in this report, it is therefore 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.

Impact on Vitality and Viability – Quantitative Impacts

- 9.10 By way of conclusion on **convenience goods quantitative impacts**, our position is that the solus trading effects of an Aldi foodstore at High Street, Skelmersdale simply would not result in any 'significant adverse' impacts upon trade and turnover on either Skelmersdale town centre or indeed any other defined centre. This is in particular given that Aldi intend to retain their Concourse Centre foodstore should permission be granted, thus ensuring no reduction in consumer choice and competition in the town centre. However, it is also reflective of the Aldi store's relatively limited size and turnover in the context of a town centre which, as a whole, already currently has a combined convenience goods turnover of some £67m.
- 9.11 Whilst the Tawd Valley Centre scheme inevitably complicates the quantitative impact picture, particularly in relation to cumulative effects, the reality is that the existing 7,900 sq. m (GIA) Asda superstore will suffer the greatest cumulative impacts, rather than smaller traders. This is a store which already performs exceptionally strongly and is of a magnitude whereby its long-term viability simply will not be affected. The Tawd Valley Centre scheme will result in a dramatic redistribution of convenience retail trade within the town centre – with much of this transferred from an over-performing Asda superstore to a new Lidl discount foodstore (via trade diversion). This is a key reason why the future turnover of the Tawd Valley Centre scheme will not result in dramatic increase in the town centre's overall convenience turnover. However, it is important not to lose sight of the fact that consumer choice and competition will be dramatically improved, with the town centre represented by Asda, Lidl, B&M, Iceland, Farmfoods and a retained Aldi in terms of convenience goods retailing options. On this basis, there will not be a 'significant adverse' impact on Skelmersdale town centre on account of the cumulative effects modelled – in fact quite the opposite.
- 9.12 Our **comparison goods quantitative impact assessment** of the application proposals has shown that there will not be any 'significant adverse' impacts on Skelmersdale town centre's comparison goods sector. Added to this is the fact that comparison expenditure growth over the assessment period outstrips the turnover of the scheme, meaning that centres such as Skelmersdale will still have a higher comparison goods turnover in 2025 than they do in 2022, even allowing for the modest impact of the application proposals.
- 9.13 Given the comparatively low comparison goods turnover of the scheme and the significantly larger size / substantially higher turnover of the comparison goods offer in Skelmersdale (which will be enhanced by the Tawd Valley centre scheme), it is clear that the application proposals will not be of any consequence in impact terms to the non-food offer of this higher order centre.

Impact on Vitality and Viability – Qualitative Impacts

- 9.14 Turning to **qualitative impacts**, a variety of factors have been outlined in Section 7 which emphasise why an Aldi foodstore of the scale proposed would be unlikely to impact adversely upon the 'vitality and viability' of the centres within the defined PCA. This is largely because Aldi 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.
- 9.15 Furthermore, the detailed **Health Check assessments** presented at **Appendix VI** of this report demonstrate that Skelmersdale town centre and Sandy Lane local centre are successfully performing their respective 'role and function' and, whilst both face challenges, the majority of their key health check indicators point towards them being 'vital and viable' at the present time. In view of the fact that the level of scheme specific 'solus' quantitative impact on surrounding centres will be relatively low, and the centres themselves appear well used and generally healthy, it follows that 'significant adverse' impacts are unlikely to be reached based on local circumstances.

Impact on Investment

- 9.16 Finally, with regards **impact upon investment**, the only centre and scheme which merits consideration is the Tawd Valley town centre expansion scheme in Skelmersdale. The first phase of this scheme (involving food and non-food retail) has reached the point of completion, with end users contractually committed, and an opening date confirmed for early 2022. It cannot therefore reasonably be suggested that Aldi's planning application at High Street (which Lidl and St Modwen have been aware of since early 2019) could still result in a 'significant adverse' impact upon this investment decision or the now finished scheme not becoming operational.
- 9.17 Added to this is the fact that the vast majority of the floorspace and uses proposed as part of the Tawd Valley scheme (80%) are not in any way convenience goods focussed and will not be affected by Aldi's introduction at High Street. Aldi's discount foodstore proposal will therefore evidently not have a '*significant adverse*' impact upon the deliverability of the further phases of this town centre redevelopment scheme.

Overall Conclusions – Retail Impact Matters

- 9.18 Drawing all of the impact analysis set out within Section 7 of our report together, it is clear that there will be no conflict with Paragraph 90 of the NPPF and the scheme is also considered to accord with the local retail impact test set out Policy IF1 of the West Lancashire Local Plan (2012 – 2027).

Other Planning Policy Matters

- 9.19 Section 8 of this report 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. This analysis, when considered alongside separate justifications for the sequential test and retail impact assessment, demonstrate the development is acceptable in planning policy terms.
- 9.20 With regards **employment land policy** in particular, Section 8 of this report has explained that whilst Employment Land Policy G4 only requires one of its three identified ‘protection tests’ to be passed, it is our view that all three can be met by the application scheme. The submitted Employment Land Report finds that based on a robust development appraisal the site is not commercially viable even for the most relevant and potentially profitable employment scheme tested. The site also has a series of suitability constraints which would preclude its use for various forms of employment development – particularly logistics. Finally, there is no evidence of demand for the site to be used solely for traditional employment purposes. Various marketing exercises have been undertaken since 2016 by leading agents for a sustained period and none have resulted in interest from employment users.
- 9.21 The Employment Land Report therefore concludes that the planning application site will remain derelict and has no foreseeable prospects of coming forwards solely for its allocated use. The mixed-use application proposals would, on the other hand, have a positive impact by providing new investment and much needed retail employment, together with an element of ‘employment accommodation’ in the form of a deliverable trade counter unit which is more suited to this location (as reflected in the comparable trade counters within the wider Westgate Industrial area). Overall, no conflict with Policy G4 of the Local Plan is therefore anticipated.

Overview, Benefits and Planning Balance

- 9.22 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.
- 9.23 Notwithstanding this robust conclusion, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. Accordingly, even if the Local Planning Authority considers that the scheme would technically fail to comply with any specific development plan policy,

consideration must also be given to other material planning considerations and whether these outweigh the local policy conflict identified.

9.24 Our report has identified a number of very positive impacts that the proposed development 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 introduction of an Aldi foodstore will play an important role in enhancing consumer choice within Skelmersdale's food retailing sector, by providing the first 'bulk' food shopping destination in the densely populated west of the town;
- 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). Evidence suggests that this superstore trades above benchmark levels, whilst its size dwarfs all other food shopping destinations in the town;
- Our Retail Impact Assessment has shown that the Aldi foodstore has the potential to 'clawback' a degree of convenience expenditure which currently leaks from Skelmersdale to existing Aldi foodstores outside the Skelmersdale area – in both Ormskirk and Burscough. In this fashion the scheme will reduce car use, result in more sustainable travel patterns, and promote social inclusion objectives;
- 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;
- Aldi will create 40 to 50 quality full and part-time jobs; delivering further indirect jobs through services supporting the new foodstore, 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 proposed policy compliant trade counter unit is both deliverable (with Toolstation confirmed as end user) and will also create 10 to 15 new full and part-time jobs;
- The proposal offers the guarantee of deliverable economic development within Skelmersdale by two national brands (Aldi and Toolstation) which will help boost the local economy and will

assist in attracting further investment. Indeed, the overall economic value of Aldi's investment alone in Skelmersdale is anticipated to exceed £5m;

- Aldi's introduction will offer sustainability benefits, including the provision of four car parking spaces that are equipped with Electric Vehicle Charging Points ('EVCP'). Furthermore, below ground infrastructure will be put in place to add up to a further 20 EVCPs in the future – future proofing the Aldi foodstore in terms of this emerging mode of private travel. Aldi will provide electricity free of charge to customers whilst retaining the option to charge customers in the future;
- 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; 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.

9.25 Overall, it has been demonstrated that the proposed mixed-use development (comprising a discount foodstore and a trade counter unit) accords with the key policies of the West Lancashire Local Plan, as well as the relevant policy tests contained within the NPPF. The applicants' position is therefore that planning permission should be granted on this basis.

9.26 Notwithstanding this, we have highlighted above that the application proposals will deliver some very significant positive benefits which weigh heavily in favour of the scheme. We consider that these benefits demonstrably outweigh any minor perceived negative impacts or policy conflicts that the Local Planning Authority may consider arise as a consequence of the foodstore development. 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 (Nov 21);
- Arboricultural Assessment prepared by Bowland Tree Consultancy (Nov 21);
- Coal Mining Risk Assessment prepared by Brownfield Solutions Ltd (Jan 18);
- Design and Access Statement prepared by The Harris Partnership (Dec 21);
- Ecological Appraisal prepared by Bowland Ecology (Jul 21);
- Flood Risk and Drainage Assessment prepared by Integra (Nov 21);
- Drainage Design Philosophy prepared by SWF (Nov 21)
- Geo-Environmental Assessment Report prepared by Brownfield Solutions Ltd (May 18);
- Noise Impact Assessment prepared by BWB Consulting (Dec 21);
- Phase 1 Site Investigation prepared by Brownfield Solutions Ltd (Jan 18);
- Employment Land Market Report prepared by Aherne Property Consultants;
- Lighting Scheme Plan prepared by SEM Technology; and,
- Transport Assessment and Travel Plan prepared by Cameron Rose Associates (Nov 21).

Plans

- 2269BOL- CGI.01D Computer Generated Image;
- 2269BOL-110C Site Location Plan;
- 2269BOL-111C Existing Site Plan;
- 2269BOL-112L Proposed Site Plan;
- 2269BOL-113B Proposed General Arrangement Plan;
- 2269BOL-114E Proposed Elevations;
- 2269BOL-115B Proposed Roof Plan;
- 2269BOL-116C Demolition Plan;
- 2269BOL-117G Boundary Treatment Plan; and,
- V2269-L01G - Landscape Scheme Plan.


Appendix II

Catchment Area Plan

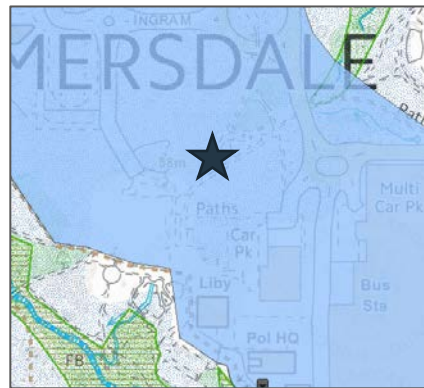
Appendix III

Sequential Assessment Pro-Formas

1. Tawd Valley Centre, Ingram Rd / Northway, Skelmersdale Town Centre

Site Image	
Site Area	<p>The site extends to approximately 5.5ha.</p>
Existing & Neighbouring Uses	<p>The site is located within the defined boundary of 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. Whilst historically grassland, the site has been the subject of intensive development activity over the past 12 months or so involving the construction of the first phase of the Tawd Valley Centre retail and leisure development. This first phase is scheduled to open to the public in early 2022 and will comprise a Lidl foodstore, B&M Homestore and a further sub-divisible retail unit of 992 sq. m. The development will also be served by 228 surface level car parking spaces.</p> <p>Phase two of the Tawd Valley Centre scheme, which is as yet forthcoming, involves the introduction of 527 sq. m GIA / 369 sq. m net of smaller scale 'flexible use' retail units, a six-screen cinema, new restaurants (to complement the cinema), a family pub, and new areas of public realm. These units would be provided as a pedestrianised terrace to the south of phase one of the scheme. It is noted that this pedestrian route and the landscaping which will support the second phase of units will be delivered as part of Phase one of the scheme - framing the future development.</p>
Sequential Position	<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 forthcoming space (such as the Tawd Valley Centre) all simply as the 'town centre'. If the PSA were to be defined and the Local Plan took a more focussed approach to retail uses, then it is unlikely that peripheral land surrounding the Concourse and Tawd Valley Centres would be classified as 'in-centre', as it appears to be at present.</p>
Policy Position	<p>An extract of the Proposals Map is provided below.</p>

1. Tawd Valley Centre, Ingram Rd / Northway, Skelmersdale Town Centre



Key



Town Centre



Ingram Rd / Northway Site

The Site is located within Skelmersdale Town Centre. Policy IF1 explains that retail uses 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.

Planning Applications

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.

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)

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.

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.

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.

2018/0898/FUL – Erection of retail foodstore (Lidl) and associated works. Approved – 21 September 2019.

2019/1285/FUL – Variation of Condition No's. 1, 2, 3, 7, 15, 17, 18, 20, 22, 24, 26, 32, 34 and 36 of planning permission 2018/0897/FUL relating to phasing, levels,

1. Tawd Valley Centre, Ingram Rd / Northway, Skelmersdale Town Centre

	<p>materials, highways, car parking management strategy (including service and delivery), drainage, landscaping and arboricultural method statement. Approved – 13th May 2020.</p> <p>2021/1085/NMA – Non Material Amendment to planning permission 2019/1285/FUL – Change of paving material manufacturer. Approved – 21st October 2021.</p> <p>2021/1087/ADV – Display of 3 x fascia signs; 4 x wall mounted billboards; 1 x poster display unit and 1 x trolley bay sign. Lidl foodstore, Unit 1, Tawd Valley Way, Skelmersdale, WN8 6HX. Approved – 2nd November 2021.</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. However, as St Modwen's marketing particulars highlight (which follow this site assessment), contracts have now been formally exchanged with both Lidl and B&M on the scheme's two largest retail units. Both of these retailers are now therefore likely to have a long leasehold interest.</p>
<p>Planning Background</p>	<p>The Tawd Valley Centre site in Skelmersdale town centre has a lengthily 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 992 sq. m GIA / 764 sq. m net.</p> <p>The Planning and Retail Statement which supports the Section 73 application (Ref. 2018/0897/FUL) is 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 992 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.</p> <p>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.</p> <p>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</p>

1. Tawd Valley Centre, Ingram Rd / Northway, Skelmersdale Town Centre

	<p>specifically to the needs of two anchor tenants (Lidl and B&M). Indeed, this is confirmed by St Modwen's marketing particulars for the scheme from mid-2020 (which follow this site appraisal) and outline that the developer has exchanged contracts with both Lidl and B&M.</p> <p>We note that three further variation of condition applications were made at the site during January and February 2020 (Refs. 2019/1258/CON, 2019/1284/FUL and 2019/1285/FUL). These applications essentially involved minor design and operational amendments to ensure that the site's current planning permissions are specifically tailored to meet Lidl's corporate requirements. Indeed, the supporting letter submitted with the applications confirms that 'Lidl will be the occupier of Block D'.</p> <p>Finally, we note that Lidl secured advertisement consent in November 2021 for fascia panels and various other signage associated with their forthcoming foodstore. This approval coincided with a press release from St Modwen Developments and their contractor Caddick Construction which confirmed that the new retail units at the Tawd Valley Centre (including B&M and Lidl) would be opening in the Spring of 2022.</p> <p>Drawing the above analysis together, it can be confirmed beyond doubt that the Tawd Valley Centre's anchor retail units will be occupied by Lidl and B&M and are due to open in early 2022. This leaves only 1,519 sq. m of retail floorspace within the remaining units / phases of the scheme; taking the form of a non-food retail unit of 992 sq. m GIA / 764 sq. m net (Unit C2) within phase one and a separate terrace of flexible use retail units of 527 sq. m GIA / 369 sq. m net in phase two.</p>
Suitability	<p>With regards the 'suitability' of the Tawd Valley Centre scheme for the circa 1,800 sq. m GIA discount foodstore proposed, the only two units large enough to accommodate this use (Units C1 and D) are to be occupied by B&M and Lidl respectively. With these units constructed, the retailers secured contractually, and the stores due to open in early 2022, it is clear that even if the units themselves are technically 'suitable', they are quite clearly unavailable – as will be explained in the following sub-section.</p> <p>Accordingly, taking a 'real world' view, the only retail units which need to be examined from a suitability perspective are Unit C2 from the largely complete phase one of the Tawd Valley scheme and the smaller 'flexible use' retail units (totalling 527 sq. m) which will form part of a future phase two:</p> <ul style="list-style-type: none">• In terms of Unit C2 (phase one), St Modwen's marketing particulars for the site (which follow this site appraisal) confirm that this remaining unit extends to just 992 sq. m (GIA). It is therefore nearly half the size of the discount foodstore proposed (1,800 sq. m) and must be dismissed as unsuitable on this basis.• Meanwhile the 'flexible use' retail units in phase two (totalling 527 sq. m) would equally be unable to accommodate the Aldi foodstore in view of their limited size, even if combined. Furthermore, the narrow linear form of these units (which is fixed in view of the fact that phase one will deliver the public realm and landscaping that will serve phase two) also represents a barrier to occupation by a discount foodstore – given their necessary uniform rectangular retail floorplate. <p>In summary, in the case of each of the remaining units permitted within the Tawd Valley scheme <u>none meet Aldi's established format requirements</u> which critically necessitates a net sales area of at least 1,315 sq.m, with 1,056 sq.m (80%) of this</p>

1. Tawd Valley Centre, Ingram Rd / Northway, Skelmersdale Town Centre

	<p>capable of stocking convenience goods. This adopts a real world approach to the test, acknowledging that Units C1 and D are to be occupied by B&M and Lidl respectively within just a matter of months. Drawing conclusions on the suitability of these units is therefore largely irrelevant.</p> <p>Drawing the above together, none of the retail units in the Tawd Valley scheme which are capable of being occupied either now or in the future can be regarded as 'suitable' alternatives for the scale and form of retail development proposed and must be dismissed on this basis.</p>
Availability	<p>Turning to the matter of 'availability', the circumstances regarding the two largest retail units at the Tawd Valley centre (Units C1 and D) are entirely clear:</p> <ul style="list-style-type: none">• Various planning permissions and amendments over the past two years have demonstrated that these units have been tailored specifically for occupation by Lidl and B&M. This includes a recent advertisement consent on Lidl's behalf;• St Modwen have confirmed on a number of occasions publicly that contracts have been exchanged with Lidl and B&M and these retailers will occupy the units. This is also reflected in the current marketing particulars; and,• Construction of the Tawd Valley scheme has been ongoing for the past 12 months and the first phase (including Units C1 B&M and D Lidl) is now nearing completion. The developer has stated publicly that the first phase will open in early 2022. <p>Accordingly, whatever view one takes in relation to the scheme's present day 'availability', there can be no suggestion that this represents anything other than a temporary position. The reality is that all evidence points to these now fully constructed units being operational within a matter of months and occupied by named end users. We therefore <u>cannot see how any sensible conclusion can be reached other than that these units are now 'unavailable' for the discount foodstore proposed</u> – this particularly in view of the fact that Aldi's application itself is unlikely to be granted permission itself until the first or second quarter of 2022.</p> <p>We note that one of the end users of the Tawd Valley scheme (Lidl) has previously objected to Aldi's application on the basis that 'available' cannot mean available to a particular retailer but must mean available for the type of retail use for which permission is sought. In making this argument the retailer's consultant cited the Aldergate v Mansfield [2016] EWHC 1670 (Admin) high court judgement ('Aldergate / Mansfield Judgement').</p> <p>However, we would urge the Council and their advisors to have regard to the specifics of that case and indeed to the current context in Skelmersdale. In our view the objectors have mis-applied the findings, which concern commercial attitudes in the application of the sequential test rather than at what point a site is no longer physically 'available' in the context of its delivery.</p> <p>To briefly summarise the Mansfield case, in essence a developer led planning application sought to reject a sequentially preferable town centre site on the grounds that their target end user (Aldi in that case) would be too close to an existing Aldi store. It was argued (erroneously) that it would be commercially unrealistic for Aldi to be expected to develop a new store in such close proximity to their existing store. In rejecting this approach, Justice Ouseley understandably</p>

1. Tawd Valley Centre, Ingram Rd / Northway, Skelmersdale Town Centre

	<p>concluded that availability cannot simply mean available to a particular retailer with a particular corporate objective or strategy.</p> <p>In our view, the context in Skelmersdale is very important and completely different. In the Mansfield scenario there was no practically completed scheme or contractually committed discount foodstore operator. Instead the applicant refused to appraise a known in-centre development opportunity which was being actively marketed purely on the basis of their target end user's implied commercial preferences. Accordingly, in the case of Aldergate / Mansfield the delivery of the proposed discount foodstore in an out-of-centre location would have left the identified town centre site bereft of an end user. The sequential test should have been conducted by the applicant in relation to the identified town centre site and the fact that it wasn't represented a fundamental flaw in their approach.</p> <p>This is not the scenario in Skelmersdale, our sequential assessment has not sought to dismiss the Tawd Valley Centre on the basis of any commercial conflict or preference. The sole issue here is whether a site can still be regarded as physically 'available' even when all evidence points towards the completed units being occupied by alternative, contractually committed retailers over a relatively immediate timeframe. Accordingly, the judgement cannot be transposed to this particular site in the way that objectors might seek to suggest.</p> <p>Drawing the above analysis together, with the end users of the scheme's largest units confirmed beyond doubt, the scheme itself practically complete, and the store opening date announced, in our view <u>the site cannot logically be regarded as 'available' in the context of the sequential test.</u> The whole purpose of the test is to facilitate development on town centre sites in the first instance, but when that development is already at a stage of completion and imminent occupation (as in this instance) it cannot be right that it is used to block investment elsewhere.</p> <p>In this case, Aldi's scheme at Pennylands represents a well-connected edge-of-centre site and a foodstore there will support the vitality and viability of Sandy Lane Local Centre. Accordingly, such an important investment should not be delayed unnecessarily until the doors of the Lidl foodstore are opened to the public (as their past objections have indicated). We use the term 'delayed' because once the Tawd Valley scheme's largest units are trading in early 2022 then even by Lidl's logic the sequential test would be passed. Accordingly, the weight to be attached to the Tawd Valley site at this point in time as a sequential alternative is exceptionally limited.</p>
Conclusion	<p>In conclusion, the Tawd Valley Centre 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. The first, a Section 73 application, enabled retail Unit C to be split into two clearly defined units, one of which (Unit C1 - 2,062 sq. m GIA) will accommodate B&M and the other (Unit C2) a non-food retailer of 992 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.</p> <p>Construction of the scheme commenced in early 2021 and Lidl secured advertisement consent in November 2021 for fascia panels and various other signage associated with their practically complete foodstore. This approval</p>

1. Tawd Valley Centre, Ingram Rd / Northway, Skelmersdale Town Centre

coincided with a press release from St Modwen Developments and their contractor Caddick Construction which confirmed that the new retail units at the Tawd Valley Centre (including B&M and Lidl) would be opening to the public in the Spring of 2022.

Set against this context of the end users of the scheme's largest units being contractually committed and confirmed beyond doubt, the scheme itself practically complete, and the opening date announced, the site cannot logically be regarded as 'available' in the context of the sequential test. The whole purpose of the test is to facilitate development on town centre sites in the first instance, but when that development is already at a stage of completion and imminent occupation (as in this instance) it cannot be right that it is used to block edge-of-centre investments elsewhere in the borough. Accordingly, the weight to be attached to the alleged 'availability' of the Tawd Valley site's largest units at this point in time has to be exceptionally limited.

Turning to 'suitability', the only two units large enough to accommodate the scale and form of discount foodstore proposed (Units C1 and D) are to be imminently occupied by B&M and Lidl respectively. Drawing conclusions on the suitability of these units is therefore largely irrelevant.

The remaining retail units within the Tawd Valley scheme which require examination from a suitability perspective are Unit C2 (992 sq. m) from the largely complete phase one and the smaller 'flexible use' retail units (totalling 527 sq. m) which will form part of a future phase two. It is clear from our appraisal of these remaining units that they are of an insufficient scale to accommodate a discount foodstore either individually or collectively. Accordingly, it can be robustly concluded that none of the retail units in the Tawd Valley scheme which are capable of being occupied either now or in the future can be regarded as 'suitable' alternatives for the scale and form of retail development proposed and must be dismissed on this basis.

In summary, the detailed sequential assessment set out above has demonstrated that the Tawd Valley retail scheme site does not represent a sequentially preferable alternative for the discount foodstore proposed. Its largest units cannot be regarded as 'available' based on any logical, real world interpretation of this test. Meanwhile, remaining units are evidently not suitable for the scale, form and format of discount foodstore required by Aldi.

TAWD VALLEY

RETAIL & LEISURE

10,681 SQ FT
RETAIL UNIT
TO LET

EXCHANGED
WITH B&M
AND LIDL



TAWD VALLEY RETAIL & LEISURE / SKELMERSDALE / LANCASHIRE / WN8 6LT



LOCATION

Skelmersdale town centre is adjacent to Junction 4 of the M58 and is easily reached by the wider motorway network. Junction 26 on the M6 is 4 miles to the East.

Skelmersdale is within easy travelling distance of major residential areas on the western fringe of Wigan and the northern fringe of St Helens, as well as the wealthy rural villages in West Lancs. Similarly, the market town of Ormskirk is just ten minutes to the north west.

SUMMARY

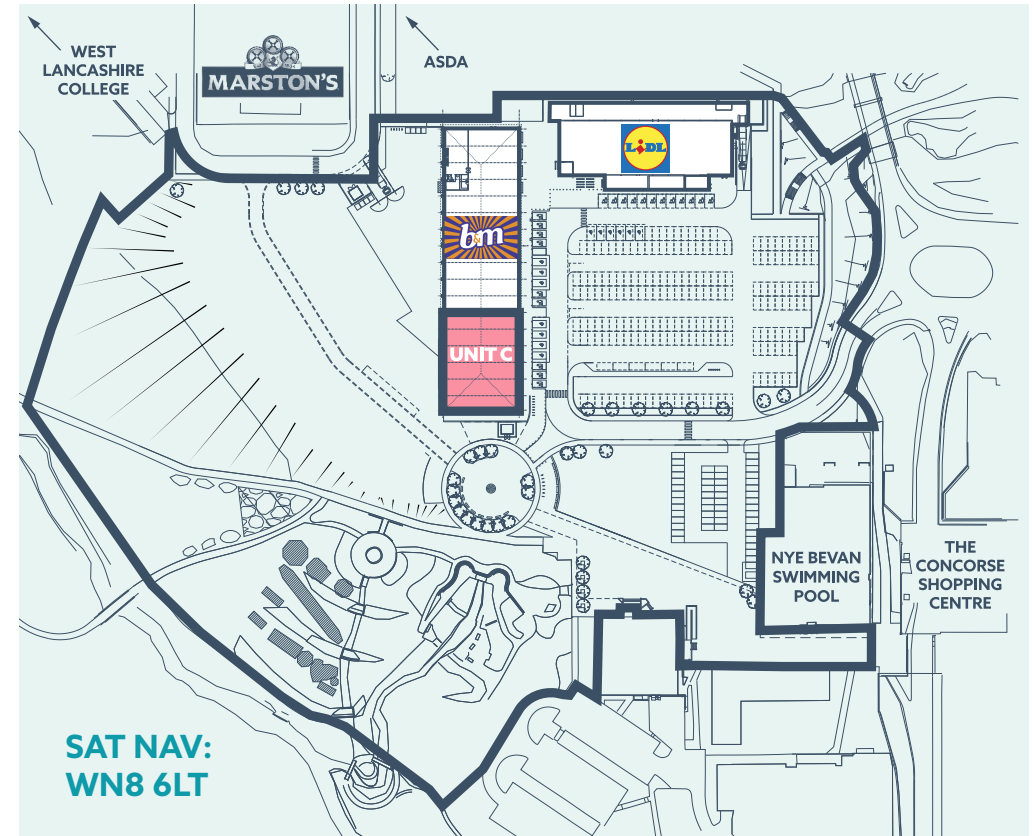
The new retail hub extending to 57,000 sq ft on the ground floor with approx 228 surface car parking spaces, will be located just to the south of the 97,000 sq ft ASDA and Marston's family pub. The scheme is situated adjacent to the town centre and the West Lancashire College with over 3,500 students and 1,000 employees. The Concourse Shopping Centre sits on the boundary of the site, which accommodates over 60 retailers and extends to 250,000 sq ft.

AVAILABILITY

UNIT C (CAN BE SPLIT)

10,681 SQ FT

992 SQ M





TIMESCALES

Construction of Phase 1 began in January 2020 with an anticipated practical completion of the scheme in Spring 2021.

PLANNING

The scheme benefits from a detailed planning consent. Planning application number 2018/0897/FUL, which includes non-food retail and the sale of comparison goods.

TERMS

The unit is available to let by way of a new full repairing insuring leases on terms to be agreed. Rental details upon application.

VAT

All figures quoted are exclusive of the value added tax which will be charged at the prevailing rate.

BUSINESS RATES

The unit will not be assessed until it is constructed. Interested parties are advised to make their own enquiries with the Local Authority.

LEGAL COSTS

Each party is to be responsible for their own legal and professional costs incurred in the transaction.

CONTACT


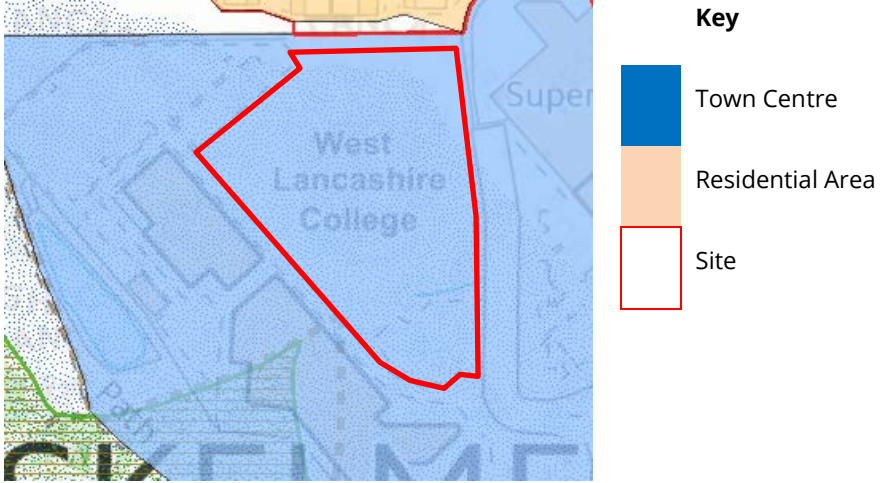
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2. Land adjacent to College Way, Skelmersdale

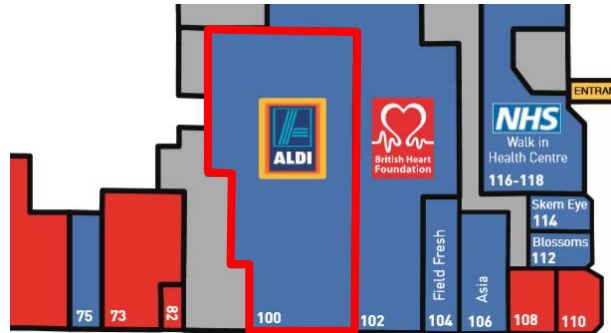
<p>Site Image</p>	
<p>Site Area</p>	<p>The site extends to approximately 1.36ha (13,573sq.m).</p>
<p>Existing & Neighbouring Uses</p>	<p>The site is located adjacent to West Lancashire College (south-west) and an Asda superstore (east).</p>
<p>Sequential Position</p>	<p>For the purposes of the sequential 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>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.</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 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 previous 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 of insufficient size to accommodate the proposed scale and form of retail development. A discount foodstore on College Way would also have no visibility or vehicular access from Ingram or Northway, delivery of such a retail use in this peripheral and inaccessible location would not therefore be commercially viable.</p> <p>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

Site Image



Background to Aldi's Concourse Centre Foodstore

The existing Aldi foodstore extends to 1,080 sq. m GIA / 880 sq. m net sales and is located on the ground floor of the Concourse Shopping Centre. Aldi has been in occupation at the unit for approximately 30 years, since the early 1990's. At that time the unit was commensurate Aldi's format and size requirements. However, the past decade or so has seen Aldi's popularity increase dramatically and as a result the retailer's current standard store format involves a net sales area of some 1,315 sq. m and a gross area of over 1,800 sq. m.

Aldi's current format therefore has a gross floor area which is some **+67% larger** than the Concourse Centre unit, and net sales area which is **+49% larger** than the Concourse Centre unit. Indeed, the concourse unit is smaller than the vast majority of units in Aldi's portfolio. It is also an anomaly in that no other Aldi stores in the Lancashire / Greater Manchester region are located in an inward facing shopping mall such as the Concourse Centre, and without any dedicated adjacent car parking.

Accordingly, this Aldi store is relatively unique in terms of their portfolio and relies to a far greater degree on 'top-up' food shoppers, rather than those undertaking a weekly (or 'bulk') food shopping trip. Indeed, this is evidenced by the fact that comparably few customers use a shopping trolley when visiting. It should also be noted that the Concourse Centre store's smaller size means that Aldi cannot stock their full food and non-food offer.

Notwithstanding its smaller size and different trading profile, Aldi still consider their Concourse Centre store to be viable. Whilst Aldi's objective remains to bring their latest discount foodstore format to Skelmersdale so that they can better meet the needs of Skelmersdale residents from a store which is capable of providing Aldi's full food offer, they are now also proposing to retain their Concourse Centre store (where the current lease runs until the end of 2025).

This represents a change to their original strategy, which was to close the Concourse Centre store prior to the opening of a new store at Westgate / High Street. However, **they now intend to trade both side-by-side**, so that there would be no consequential reduction in consumer choice and competition within the town centre.

In view of this context, the application of the sequential test to the Concourse Centre's existing Aldi foodstore is largely irrelevant, as Aldi's occupation renders it unavailable. However, for completeness as commentary is provided below.

Existing & Neighbouring Uses

The Aldi foodstore is located on the ground floor of the shopping centre mall, opposite the indoor market facilities and next to the West Lancashire Wellbeing Hub – a recently opened medical facility. There is no direct customer car parking adjacent to the Aldi unit, with this accessed via the mall entrance / exit to the west.

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

Sequential Position	As the Concourse Shopping Centre falls within Skelmersdale town centre the existing Aldi store must be regarded as an 'in-centre' site.
Policy Position	The Concourse Shopping Centre is located within Skelmersdale Town Centre. Policy IF1 sets out that retail uses will be encouraged within town and local centres.
Planning Applications	There have been no planning applications of relevance at the Aldi foodstore unit within the Concourse Shopping Centre over the recent past.
Ownership Position	The unit is in the ownership of London & Cambridge Properties ('LCP'), who are also the shopping centre's landlord.
Suitability	<p>In examining the 'suitability' of the <u>existing Aldi foodstore itself</u> for the scale and form of discount foodstore proposed on the application site, it would have to logically be concluded that this is of an insufficient size and is therefore dismissed on this basis. As already set out above, at 1,804 sq. m GIA / 1,315sqm net sales, Aldi's current format has a gross floor area which is some +67% larger than the Concourse Centre unit, and net sales area which is +49% larger than the Concourse Centre unit. Further, it has been explained that the store's smaller size means that Aldi cannot stock their full food and non-food offer, which is the primary driver for the provision of a new store - in order to better meet the needs of Skelmersdale's 40,000 residents. This represents a further reason why the existing store is not suitable for the scale and form of foodstore now proposed.</p> <p>Notwithstanding this, we are aware that when Aldi's planning application was first submitted at the end of 2019, representations of objection were received on behalf of LCP (dated 3rd December 2019) which explained that the landlord would be prepared to assemble a larger unit for Aldi within the Concourse. This would involve amalgamating units 100 (currently Aldi), 102 (West Lancashire Wellbeing Hub) and 104 (Field Fresh Groceries) to provide a single retail unit of 1,786 sq. m GIA / 1,315 sq. m net sales. The unit would still be inwards facing, with no direct external customer access, but would include a new 'mall link' corridor from the covered shopping mall itself to the multi-storey car park to the north.</p> <p>In Aldi's view, simply suggesting that a unit commensurate with a discount foodstore could be hypothetically assembled within the Concourse Centre does not make this 'suitable' for the scale and form of discount foodstore proposed. The reasons for this relate to the fact that the Concourse Centre store already suffers from a range of operational inefficiencies which are inherently linked to its in-wards facing, shopping mall location. These issues will not be resolved by the expansion of the foodstore unit, all this will do is increase the cost burden upon Aldi without providing a store which is capable of serving 'main' food shoppers. The reasons for Aldi's conclusions on this matter are as follows:</p> <p><u>Inability to Provide Dedicated Surface Level Car Parking</u></p> <p>It is a pre-requisite for discount foodstores of the scale and form proposed to have immediately adjacent surface-level car parking facilities. Their primary function is to cater for 'bulk' food shopping needs and therefore the majority of customers will be visiting to undertake a 'weekly' shopping trip, involving several heavy shopping bags. Customers may also be visiting to purchase a product from Aldi's non-food 'special buy' range which could be large / heavy and therefore unmanageable on foot. Accordingly, it is a necessity that customers have the opportunity to take their</p>

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

goods home via private car (should they choose) in a straightforward and accessible manner.

LCP appears to acknowledge this as a key problem with Aldi's current Concourse Centre store and their hypothetical scheme therefore seeks to facilitate access to the multi-storey car park to the north, via a new corridor link which wraps around the rear of the foodstore.

However, in reality this is simply not a realistic or workable solution for 'bulk' food shoppers. It will involve these customers pushing heavy shopping trolleys some 80m to 100m from the store to their cars via convoluted network of corridors – with there being no direct line of sight to where they are going. The distance referenced also assumes that customers have managed to park in one of closer bays on the ground floor of the multi-storey car park.

Indeed, if they haven't managed to park on the ground floor then it is not entirely clear how a shopper would then get their trolley to an upper parking level without a lengthily walk through the shopping centre itself to use lifts. Added to this burden is that customers would then need to bring the shopping trolley back to the discount foodstore before leaving. All discount foodstores (i.e. both Lidl and Aldi) operate a system whereby shopping trolleys need to be returned to the store entrance, as a refundable charge (£1 coin) is involved in their usage.

In view of its evident parking constraints, Aldi find that the existing store is largely frequented by basket shoppers who are purchasing a lesser number of items in view of the lack of accessibility to car parking. They do not consider that this position will change materially through the introduction of a convoluted link corridor. Aldi would understandably not be prepared to make a significant investment in a new 'full sized' foodstore with this type of permanent limitation and we would speculate that any other 'bulk' food retailer would give the same response. Accordingly, it is clear that on this basis the amalgamated unit presented would be 'unsuitable' and 'unviable' for the scale and form of discount foodstore proposed – which is focussed on bulk food shoppers – by virtue of its inadequate car parking arrangements.

Lack of Inclusivity of Proposed Parking Arrangements

Linked to the above point, Aldi are particularly concerned that the lengthily 'link corridor' arrangement proposed by LCP would effectively preclude elderly customers, those with limited mobility, and parents with small children from using the amalgamated foodstore unit for 'bulk' food shopping purposes. All of these groups would evidently be discouraged by the distance that a shopping trolley would need to be pushed (and returned). This is the obvious reason why both 'disabled' and 'parent and child' spaces are given priority in Aldi's new build schemes.

Aldi is of the view that customers in these groups would simply look elsewhere when 'bulk' food shopping, particularly given surrounding competitors such as Asda and Lidl who have access to immediately adjacent, dedicated surface level car parks. This is a further reason why expanding their store in the Concourse Centre is simply not a viable option for Aldi, this inherent site constraint will not be resolved by more floorspace or the proposed corridor arrangement.

Lack of Visual Prominence

Expanding the size of the Aldi store will do nothing to address the fact that it lacks visual prominence when compared to the retailer's wider north-west portfolio. The unit has no external customer entrance and is instead inwards looking, facing the covered shopping mall. This lack of prominence results in this particular foodstore

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

being frequented largely by top-up food shoppers, and this is a role that Aldi believes that the existing sized store can continue to play. However, in view of its inherent lack of prominence, it would understandably not be viable for Aldi to take on the cost of its expansion and the ongoing rent increase, as the retailer simply does not believe that this will result in a commensurate increase in sales.

Limited Operational Hours

Aldi's nation-wide opening hours are 08:00 to 22:00, Monday to Saturday. In contrast, the Concourse Shopping Centre closes at 17:30 on most nights of the week, with the exception of Thursdays and Fridays (19:00). Within the Concourse Centre Aldi's operational hours are obviously dictated by the opening hours of the shopping centre itself, meaning that effectively the Aldi store misses out on several hours of trade each day – when compared to its wider portfolio. Whilst the retailer finds this to be workable in the case of their existing unit – which relies heavily on 'top-up' shoppers already using the mall – the restricted operational hours would be a far more detrimental viability constraint if their store was expanded in an attempt to cater for 'main' food shoppers.

This is because the cost of its expansion and the ongoing rent increase would be compounded by the fact that sales targets would be badly hit by an inability to trade for the same duration as other foodstores in their portfolio. Such an ongoing viability constraint simply would not be acceptable to Aldi's board (or indeed any discount food retailer) and an expanded store with compromised trading hours therefore simply would not be supported.

Proposed Servicing Arrangements

A final constraint is that the servicing arrangements proposed for the expanded foodstore unit are not compatible with a discount foodstore of the scale and form proposed. Aldi's modern, current format foodstores take multiple daily deliveries via HGV and this includes perishable goods such as food. This necessitates a dedicated servicing yard within which a HGV can safely manoeuvre and a dock-levelling system to enable deliveries to be wheeled directly into the store's goods warehouse.

In contrast, servicing for LCP's amalgamated unit appears to be taken from a physically constrained shared servicing area. Whilst this appears broadly compatible with HGVs, the draft plan they have prepared is clear that there would be no dock leveller and goods would then need to be wheeled through a shared service corridor to Aldi's back of house area. This is not workable for retailers such as Aldi whose business models are underpinned by maximising staff efficiencies.

A dock-levelling system is a critical part of the store operations for Aldi's current format foodstores and is a well-understood requirement of all new facilities. The staff resource involved without this feature and in several day-to-day movements of goods through shared servicing corridors (such as those present within the Concourse centre) would not be commercially viable in an expanded store – where there would be more stock to replenish daily. Whilst the current servicing arrangement may workable in the Concourse's store's present much smaller form, it would not be feasible or commercially viable should the sales floorspace be expanded by some +50% - as would be case in LCP's expanded unit.

Conclusions

In conclusion, the existing Concourse Aldi foodstore itself (which extends to just 1,080 sq. m) would evidently not be 'suitable' for the scale and form of discount

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

	<p>foodstore proposed on the application site (1,800 sq. m GIA). It would have to logically be concluded that this is of an insufficient size and dismissed on this basis.</p> <p>We have also examined LCP's suggestion (see objection dated 3rd December 2019) that a larger unit could be assembled via the amalgamation of units 100 (currently Aldi), 102 (West Lancashire Wellbeing Hub) and 104 (Field Fresh Groceries) to provide a single retail unit of comparable size to Aldi's proposed foodstore.</p> <p>As explained in the above commentary, simply suggesting that a unit commensurate with a discount foodstore could be hypothetically assembled within the Concourse Centre does not make this 'suitable' or commercially 'viable' for the scale and form of discount foodstore proposed. Aldi's Concourse Centre store already suffers from a range of operational inefficiencies which are inherently linked to its in-wards facing, shopping mall location, which has no dedicated car parking.</p> <p>These issues will not be resolved by the expansion of the foodstore unit. All this will do is increase the cost burden without providing a store capable of serving the needs of 'bulk' food shoppers. Accordingly, whilst Aldi believes that the current store has a role to play in Skelmersdale as predominantly a top-up food shopping destination, it does not consider that it would be suitable/viable for any discount food retailer to take on the cost of its expansion and the ongoing rent increase for a store incapable of delivering a commensurate increase in sales.</p>
Availability	<p>A site is considered 'available' for development, when, on the best information available, there is confidence that there are no insurmountable legal or ownership problem (such as tenancies) and there is also a willingness for the parties involved to see development take place. In this case, in order for the foodstore unit speculated by LCP to be created, three existing units would be involved – Unit 100 (Aldi), Unit 102 (West Lancashire Wellbeing Hub) and Unit 104 (Field Fresh Groceries).</p> <p>In respect of Aldi, they can confirm that their current lease runs for a further four years and they are content with the current role and function of their store within the Concourse Centre. As has been made clear in our 'suitability' commentary, they do not regard an expanded store as a suitable/viable option for a mall location and would not therefore make their unit 'available' to facilitate such a scheme. This represents an insurmountable ownership (tenancy) barrier which would inevitably prevent an expanded foodstore being realised over a reasonable time period.</p> <p>Notwithstanding this factor, we note that both Units 102 and 104 of the Concourse Centre are currently occupied and that in the case of Unit 102 this has only very recently been fitted out as the West Lancashire Wellbeing Hub – a medical facility. This would strongly suggest that Unit 102 is no longer available. Unit 104 also remains occupied and whilst LCP have previously claimed (June 2020) that they intend to serve notice on the tenant to redevelop the unit, this does not appear to have taken place. It is therefore anticipated that they have renewed their lease.</p> <p>What is clear from the above commentary concerning Units 102 and 104 is that there is a disconnect between what LCP has previously stated in relation to their 'availability' and the reality of the situation. Both remain occupied (one with a new tenant) despite LCP arguing previously that they were very much available for redevelopment and would be vacated in preparation. We cannot see how any conclusion other than that there units are 'unavailable' can be reached, on the best information available.</p> <p>To conclude on 'availability', Aldi's unit is evidently not available as they have a lengthily lease in place and no intention of changing the format of their current</p>

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

	<p>foodstore in the Concourse centre – the trading profile of which they feel is appropriate in its current form. Meanwhile, on the best information available, neither Units 102 or 104 are available – with one only recently occupied by a medical facility and the other retaining a long-term tenant. The conclusion to be drawn from this evidence is that the units involved are not ‘available’ for the scale and form of discount foodstore proposed.</p>
Conclusions	<p>The existing Aldi foodstore in the Concourse Shopping Centre extends to 1,080 sq. m GIA / 880 sq. m net sales. Aldi’s current format (circa 1,800 sq. m GIA / 1,315 sq. m net) therefore has a gross floor area which is some +67% larger than the Concourse Centre unit, and net sales area which is +49% larger. This Aldi store is therefore relatively unique in terms of their portfolio and relies on ‘top-up’ food shoppers, rather than those undertaking a weekly (or ‘bulk’) food shopping trip.</p> <p>Notwithstanding its smaller size and different trading profile, Aldi still consider their Concourse Centre store to be viable. Whilst Aldi’s objective remains to bring their latest discount foodstore format to Skelmersdale so that they can better meet the needs of Skelmersdale residents from a store which is capable of providing Aldi’s full food offer, they are now also proposing to retain their Concourse Centre store (where the current lease runs until the end of 2025). This represents a change to their original strategy and the sequential test has been applied on this basis.</p> <p>With regards ‘suitability’, the existing Concourse Aldi foodstore itself would evidently not be ‘suitable’ for the scale and form of discount foodstore proposed on the application site by virtue of its much smaller size and must be dismissed on this basis.</p> <p>We have also examined LCP’s suggestion (see objection dated 3rd December 2019) that a larger unit could be assembled via the amalgamation of units 100 (currently Aldi), 102 (West Lancashire Wellbeing Hub) and 104 (Field Fresh Groceries) to provide a single retail unit of comparable size to Aldi’s proposed foodstore.</p> <p>Accordingly, LCP simply suggesting that a unit commensurate with a discount foodstore could be hypothetically assembled within the Concourse Centre does not make this ‘suitable’ or commercially ‘viable’ for the scale and form of discount foodstore proposed. Aldi’s Concourse Centre store already suffers from a range of operational inefficiencies which are inherently linked to its in-wards facing, shopping mall location, which has no dedicated car parking.</p> <p>These issues will not be resolved by the expansion of the foodstore unit. All this will do is increase the cost burden without providing a store capable of serving the needs of ‘bulk’ food shoppers. Accordingly, whilst Aldi believes that their current store has a role to play in Skelmersdale as predominantly a ‘top-up’ food shopping destination, it does not consider that it would be suitable / viable for any discount food retailer to take on the cost of its expansion and the ongoing rent increase for a store incapable of delivering a commensurate increase in sales. The hypothetical amalgamated unit must therefore be dismissed as unsuitable on this basis.</p> <p>With regards the ‘availability’ of the floorspace required, Aldi’s unit is evidently not available as they have a lengthy lease in place and no intention of changing the format of their current foodstore in the Concourse centre – the trading profile of which they feel is appropriate in its current form. Meanwhile, on the best information available, neither Units 102 or 104 are available – with one only recently occupied by a medical facility and the other retaining a long-term tenant. The conclusion to be drawn from this evidence is that the units involved are not ‘available’ for the scale and form of discount foodstore proposed.</p>


4. Other Vacant Units, Concourse Shopping Centre, Skelmersdale

<p>Units Identified</p>	<p>Based on our appraisal of the shopping centre utilising up-to-date field work and Experian GOAD data, we have established that the <u>10 largest vacant units</u> on the ground and first floors are as follows:</p> <ul style="list-style-type: none"> • Unit 133/135 – 390 sq. m • Unit 30/32 – 340 sq. m • Unit 145/147 – 298 sq. m • Unit 131 – 280 sq. m • Unit 33 – 220 sq. m • Unit 15 – 220 sq. m • Unit 144 – 160 sq. m • Unit 25 – 160 sq. m • Unit 11 – 150 sq. m • Unit 141 – 140 sq. m <p>Whilst it is acknowledged that there are additional vacant units, all of these are smaller and therefore it stands to reason that if the above are found to be 'unsuitable' then it would follow that even smaller units again will equally be 'unsuitable'.</p>
<p>Sequential Position</p>	<p>As the Concourse Shopping Centre falls within Skelmersdale town centre the units identified are all to be regarded as 'in-centre'.</p>
<p>Policy Position</p>	<p>The units are located within Skelmersdale Town Centre, where Policy IF1 states that retail uses will be encouraged within town and local centres.</p>
<p>Ownership Position</p>	<p>The units in question are in the ownership of London & Cambridge Properties ('LCP'), who are also the shopping centre's landlord.</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 scale and form of discount foodstore proposed. However, even in the case of the largest vacant unit identified in the Concourse Centre (Unit 133/135), its gross area of 390 sq. m is more than four times smaller than that of Aldi's proposed foodstore (1,804sqm GIA). Accordingly, even allowing for a very considerable degree of flexibility, the vacant units identified would be unable to achieve Aldi's net sales area alongside all necessary back-of-house provision. The vacant units must therefore be regarded as 'unsuitable' for the scale and form of development proposed by virtue of their size.</p> <p>In addition to the insufficient size of the units identified, a further constraint is that these units are 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> <p>The fact that the pedestrian access arrangements from the ground and first floor levels of the Concourse Shopping Centre to available car parking is so challenging for shopping trolley users is considered to be a further reason why these units are not 'suitable' for the scale and form of discount foodstore proposed. This is</p>

4. Other Vacant Units, Concourse Shopping Centre, Skelmersdale

	<p>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>
Availability	<p>As the units in question are currently vacant and appear to be available for lease, they must equally be regarded as 'available' in the context of the sequential approach.</p>
Conclusions	<p>In conclusion, even the largest vacant unit identified in the Concourse Shopping Centre (390 sq. m) is more than four times smaller than the scale and form of discount foodstore proposed on the application site (1,804sqm GIA). Accordingly, even allowing for a very considerable degree of flexibility, the vacant units identified would be unable to achieve Aldi's net sales area alongside all necessary back-of-house provision. The vacant units must therefore be regarded as 'unsuitable' for the scale and form of development proposed by virtue of their size.</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 ground and first floor level. It involves a lengthily walk through the mall and then on to the surface level or multi-storey car park. An Aldi foodstore'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 vacant units in the Concourse Centre achieving this objective and renders them unsuitable accordingly.</p> <p>Given the above evidence, it must be concluded that whilst the vacant units identified in the Concourse Centre are evidently 'available', there are a variety of reasons why they would not be 'suitable' for occupation by Aldi, not least their insufficient size. Accordingly, these units do not represent sequentially preferable alternatives to the planning 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 0.6ha.</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 0.7ha. 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> <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</p>

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

	<p>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.</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.</p>

6. Former Glenburn Sports College Site, Yewdale, Southway, Skelmersdale, WN8 6JB

<p>Site Image</p>	
<p>Site Area and Location</p>	<p>The site extends to 1.5 ha and is located to the south of the Concourse Shopping Centre in Skelmersdale, albeit it is separated by woodland and greenspace. Southway is to the east, Grimshaw Road is to the south, and to the west is unmaintained grassland.</p>
<p>Existing & Neighbouring Uses</p>	<p>The site previously accommodated Glenburn Sports College, an 11–16 mixed, foundation secondary school that was established in 1967 but closed in 2016. Having remained vacant for a number of years, the college buildings were demolished in 2021. The site is now cleared of all built form but hardstanding and the disused adjacent sports fields remain.</p> <p>There are no immediately surrounding uses of note, given the nature of the site's former college use. Vehicular access is taken from Yewdale immediately north, whilst the closest public transport connection (a bus stop) is to the east on Southway.</p>
<p>Sequential Position</p>	<p>The closest defined centre to the site is Skelmersdale town centre to the north. The southernmost boundary of the centre is only just within a 300m walking distance of the former college site and (given this distance) if it is also “well connected to” the centre then it is capable of being classified as an ‘edge-of-centre’ location.</p> <p>However, from our on-site observations the former college site is <u>not well connected to the centre</u>. This is because there is no pedestrian route along Southway and therefore pedestrians would need to rely upon a pathway through woodland which separates the college site from the town centre. This route is poorly lit, convoluted and involves several sets of steps (without alternatives for pushchairs/wheelchairs). Furthermore, the pedestrian route involves dropping down a relatively steep slope to cross the River Tawd and then back up the other side of this valley. Such a route is evidently not appropriate for those who lack mobility.</p> <p>It is therefore considered that if a discount foodstore was delivered on the former college site, it would foster very few (if any) linked shopping trips with Skelmersdale town centre. In this context, it is necessary to regard the former Glenburn Sports College site as an ‘out-of-centre’ location in the context of the sequential test's application.</p>
<p>Policy Position</p>	<p>Whilst the Glenburn College site does not fall within the defined ‘town centre boundary’ for retail policy purposes, it does fall within the much wider strategic policy designation: “Policy SP2: Skelmersdale Town Centre: A Strategic Development Site”. In relation to the college site, Policy SP2 states that:</p>

6. Former Glenburn Sports College Site, Yewdale, Southway, Skelmersdale, WN8 6JB

	<ul style="list-style-type: none"> • xiii. The site of the former college (adjacent to Glenburn School) is designated as a Development Opportunity Site appropriate for either <u>improved educational facilities, office accommodation or housing development</u>. • xiv. The adjacent Glenburn School site should be enhanced as an educational facility and development will be permitted on the site to allow this to be achieved.
<p>Planning Applications / Development Proposals</p>	<p>Whilst there are no recent or pending planning applications of relevance on the former college site, there are emerging development proposals of significance. The land has been confirmed as the preferred location for a future railway station to serve Skelmersdale. This was confirmed in 2017 through a partnership involving Lancashire County Council (the landowner), West Lancashire Borough Council, and Merseytravel.</p> <p>However, as recently as September 2021 it is understood that Lancashire County Council submitted a strategic outline business case for the new railway line and station to the Government. This bid document is understood to name the former Glenburn College site as the preferred location for a new railway station and associated public transport hub for Skelmersdale. It therefore appears clear that the land is integral to the County and Local Council's aspirations to deliver a rail link for Skelmersdale.</p>
<p>Ownership Position</p>	<p>The land is understood to have been acquired from the local education authority by Lancashire County Council in 2017.</p>
<p>Suitability</p>	<p>In terms of the site's 'suitability' for the scale and form of discount foodstore proposed, the first constraint is that it cannot logically be regarded as preferable to the application site on the basis that it is sequentially inferior. This is based on its much poorer connectivity to the closest defined centre.</p> <p>The application site is just under 175m from Sandy Lane local centre and benefits from relatively straightforward, direct, and well-lit pavement access. In contrast, the college site is a full 300m walking distance from Skelmersdale town centre. Furthermore, this pedestrian route involves a public footpath through a wooded area which is poorly lit, contains various steps, and is steeply sloped both down and back up a river valley.</p> <p>Accordingly, whilst the planning application site offers the opportunity to foster linked shopping trips with Sandy Lane and can credibly be regarded as an 'edge-of-centre' opportunity, the college site is evidently an 'out-of-centre' location which offers no realistic prospect of linked shopping trips with Skelmersdale town centre. In this context, the college site cannot be regarded as sequentially preferable to the planning application site and should be dismissed as an alternative on this basis.</p> <p>The college site is also considered to suffer from significant policy constraints. Firstly, Policy SP2 of the adopted Local Plan (2013) is clear that the former college site should be redeveloped for either improved educational facilities, office accommodation or housing development. Retail is not cited as a suitable alternative.</p> <p>Notwithstanding the unfavourable Local Plan position, a more significant strategic policy constraint is the fact that since the Local Plan's adoption Lancashire County Council and other key stakeholders (including West Lancashire BC) have identified the former college site as the preferred location for a new railway station to serve Skelmersdale. A recent funding bid has been submitted to Government which identifies the site as the location for Skelmersdale's future railway station.</p> <p>Accordingly, it is simply not possible that the Local Planning Authority would entertain an alternative proposal for a use such as a discount foodstore, given the significance and importance of delivering a new rail link to the town. This therefore represents a further 'suitability' barrier to the delivery of the retail development proposed.</p>

6. Former Glenburn Sports College Site, Yewdale, Southway, Skelmersdale, WN8 6JB

Availability	<p>In terms of the site's 'availability', it is understood to be in the ownership of Lancashire County Council, having been acquired from the local education authority in 2017. The sale price was understood to be £1, and this was on the basis that the land would be used as part of a future Lancashire county council funding bid for a new railway station to serve Skelmersdale.</p> <p>With the County Council having formally submitted their rail link business case to the Government as recently as September 2021, all evidence suggests that they still intend to use the acquired college site for the purposes of a future railway station and public transport hub. On this basis, the site is evidently not 'available' for redevelopment to provide a discount foodstore and must be dismissed accordingly.</p>
Conclusions	<p>Drawing the above analysis together, as a starting point, the former Glenburn College site to the south of Skelmersdale town centre cannot be regarded as preferable to the application site on the basis that it is <u>sequentially inferior</u>. This is in view of its much poorer connectivity to the closest defined centre. Our commentary has explained that the college site is a full 300m walking distance from Skelmersdale town centre and the route involves a public footpath through a wooded area which is poorly lit, contains various steps, and is steeply sloped both down and back up a river valley.</p> <p>Accordingly, whilst the planning application site offers the opportunity to foster linked shopping trips with Sandy Lane local centre (175m north) and can credibly be regarded as 'edge-of-centre', the college site is evidently 'out-of-centre' and offers no realistic prospect of linked shopping trips with Skelmersdale town centre. In this context, the college site cannot be regarded as sequentially preferable to the planning application site and should be dismissed as an alternative on this basis.</p> <p>A further suitability constraint is that Lancashire County Council and other key stakeholders (including West Lancashire BC) have identified the former college site as the preferred location for a new railway station to serve Skelmersdale. A funding bid has recently been submitted to Government which confirms this. It is inconceivable that the Local Planning Authority would entertain an alternative proposal for a use such as a discount foodstore, given the significance and importance of delivering a new rail link to the town. This therefore represents a clear 'suitability' barrier.</p> <p>Turning to availability, the County Council acquired the site in 2017 specifically for the rail project and, having formally submitted their business case to the Government as recently as September 2021, all evidence suggests that they still intend to use the land for purposes of a future station and public transport hub. On this basis, the site is evidently not 'available' for an alternative use such as a foodstore.</p> <p>Given the above evidence, it must be concluded that the former Glenburn College site 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	2025	2026	2027
Aldi Foodstore (Use Class E)	Convenience	1,804	1,052	£11,517	£12.12	£12.76	£12.15	£12.24	£12.24	£12.24	£12.24	£12.24	£12.24
	Comparison		263	£9,755	£2.57	£2.20	£2.43	£2.54	£2.61	£2.69	£2.77	£2.85	£2.94
	Total		1,315	-	£14.68	£14.96	£14.57	£14.78	£14.85	£14.93	£15.01	£15.10	£15.18
Trade Counter Unit (Use Class B8)	Convenience	372	0	£0	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
	Comparison		74	£16,801	£1.25	£1.07	£1.18	£1.24	£1.27	£1.31	£1.35	£1.39	£1.43
	Total		298	-	£1.25	£1.07	£1.18	£1.24	£1.27	£1.31	£1.35	£1.39	£1.43
Convenience turnover					£12.12	£12.76	£12.15	£12.24	£12.24	£12.24	£12.24	£12.24	£12.24
Comparison turnover					£3.82	£3.28	£3.61	£3.77	£3.88	£4.00	£4.12	£4.24	£4.37
Total					£15.93	£16.04	£15.75	£16.01	£16.13	£16.24	£16.36	£16.49	£16.61

Notes:

- a. Gross floorspace of proposed Aldi foodstore and trade counter unit sourced from architectural drawings
- b. Net sales area and convenience goods / comparison goods floorspace split of Aldi provided by operator
- c. Net sales area of trade counter unit is an AY estimation based on information from Toolstation (the anticipated end user)
- d. Convenience and comparison goods sales densities for Aldi derived from Mintel 2021 UK Retail Rankings, albeit adapted with updated floorspace and unit numbers supplied by Aldi Stores Ltd
- e. Comparison goods sales density for the trade counter unit is reflective of the 'sales per outlet' figure for Toolstation (the end user) from Mintel Retail Rankings 2021
- f. Turnovers projected forwards using Experian forecast sales densities from Figures 4a and 4b (Page 14) of Experian Retail Planner Briefing Note 18 (October 2020) (Latest available at the time of preparation)

2019 Prices

**PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT**

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

ZONE	POPULATION								
	2019	2020	2021	2022	2023	2024	2025	2026	2027
1 (Buffer)	28,969	29,026	29,065	29,111	29,166	29,231	29,298	29,364	29,429
2a (Buffer)	13,456	13,483	13,500	13,522	13,548	13,578	13,609	13,639	13,670
2b (Buffer)	33,312	33,378	33,422	33,475	33,539	33,613	33,691	33,766	33,841
3a (PSA)	16,671	16,704	16,726	16,753	16,785	16,822	16,861	16,898	16,936
3b (PSA)	36,887	36,960	37,009	37,067	37,138	37,221	37,306	37,390	37,473
TOTAL	129,295	129,550	129,721	129,927	130,176	130,464	130,765	131,058	131,350

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 report (November 2021 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	PER CAPITA CONVENIENCE EXPENDITURE								
	2019	2020	2021	2022	2023	2024	2025	2026	2027
1 (Buffer)	£2,311	£2,505	£2,350	£2,357	£2,357	£2,359	£2,362	£2,362	£2,359
2a (Buffer)	£2,339	£2,535	£2,378	£2,385	£2,385	£2,388	£2,390	£2,390	£2,388
2b (Buffer)	£2,293	£2,486	£2,332	£2,338	£2,338	£2,341	£2,343	£2,343	£2,341
3a (PSA)	£2,391	£2,592	£2,431	£2,438	£2,438	£2,441	£2,443	£2,443	£2,441
3b (PSA)	£2,121	£2,299	£2,157	£2,163	£2,163	£2,165	£2,167	£2,167	£2,165
ANNUAL GROWTH	-	8.4%	-6.2%	0.2%	0.0%	0.1%	0.1%	0.0%	-0.1%

Notes:

- a. Per capita expenditure derived from Experian Location Analyst data report (November 2021 Report)
- b. Per capita expenditure projected forward using forecast growth rates taken from Figure 6, Appendix 3 of Experian Retail Planner Briefing Note 18 (October 2020)
- c. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

2019 Prices

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

ZONE	PER CAPITA CONVENIENCE EXPENDITURE								
	2019	2020	2021	2022	2023	2024	2025	2026	2027
1 (Buffer)	£2,214	£2,347	£2,223	£2,230	£2,223	£2,218	£2,215	£2,213	£2,206
2a (Buffer)	£2,241	£2,376	£2,250	£2,257	£2,249	£2,245	£2,242	£2,240	£2,233
2b (Buffer)	£2,197	£2,329	£2,206	£2,212	£2,205	£2,200	£2,198	£2,196	£2,189
3a (PSA)	£2,291	£2,429	£2,300	£2,307	£2,299	£2,294	£2,292	£2,289	£2,282
3b (PSA)	£2,032	£2,154	£2,040	£2,046	£2,040	£2,035	£2,033	£2,031	£2,025
ANNUAL GROWTH	4.2%	6.3%	5.4%	5.4%	5.7%	6.0%	6.2%	6.3%	6.5%

Notes:

- a. Per capita expenditure derived from Experian Location Analyst data report (November 2021 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 18 (October 2020)
- c. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

2019 Prices

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

ZONE	TOTAL CONVENIENCE GOODS EXPENDITURE								
	2019	2020	2021	2022	2023	2024	2025	2026	2027
1 (Buffer)	£64.14	£68.13	£64.61	£64.90	£64.82	£64.82	£64.90	£64.98	£64.92
2a (Buffer)	£30.15	£32.03	£30.37	£30.51	£30.47	£30.48	£30.51	£30.55	£30.52
2b (Buffer)	£73.18	£77.74	£73.72	£74.05	£73.96	£73.96	£74.05	£74.14	£74.07
3a (PSA)	£38.19	£40.57	£38.47	£38.64	£38.60	£38.60	£38.64	£38.69	£38.65
3b (PSA)	£74.95	£79.62	£75.50	£75.85	£75.75	£75.76	£75.85	£75.93	£75.86
TOTAL	£280.60	£298.09	£282.67	£283.97	£283.61	£283.61	£283.95	£284.28	£284.02

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

2019 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 3: CONVENIENCE GOODS SHOPPING PATTERNS IN BASE YEAR OF 2022 (€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%	€7.24	3.9%	€1.19	5.1%	€3.78	0.3%	€0.12	0.7%	€0.53	4.5%	€12.78
Booths, Station Road, Hesketh Bank Village Centre	8.7%	€5.61	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	1.9%	€5.40
Tarleton Village Centre	5.6%	€3.63	0.0%	€0.00	0.5%	€0.37	0.0%	€0.00	0.0%	€0.00	1.4%	€3.98
Other, Zone 1	2.3%	€1.49	0.0%	€0.00	0.0%	€0.00	0.3%	€0.12	0.0%	€0.00	0.6%	€1.70
Sub Total (Zone 1)	27.7%	€17.98	3.9%	€1.19	5.6%	€4.15	0.7%	€0.23	0.7%	€0.53	8.4%	€23.85
Zone 2a												
Tesco, Liverpool Road North, Burscough Town Centre	7.8%	€5.06	25.8%	€7.87	2.3%	€1.70	5.4%	€2.09	0.7%	€0.53	6.0%	€17.04
Other, Burscough Town Centre	0.2%	€0.13	8.6%	€2.62	0.7%	€0.52	2.0%	€0.77	0.3%	€0.23	1.5%	€4.26
Total Burscough Town Centre	7.9%	€5.13	34.4%	€10.50	3.0%	€2.22	7.5%	€2.90	1.0%	€0.76	7.5%	€21.30
Aldi, Ringtail Retail Park, Burscough	8.0%	€5.19	26.8%	€8.18	8.3%	€6.15	3.6%	€1.39	4.4%	€3.34	8.5%	€24.14
Booths, Ringtail Retail Park Burscough	1.5%	€0.97	9.6%	€2.93	2.6%	€1.93	3.9%	€1.51	0.5%	€0.38	2.7%	€7.67
Other, Zone 2a	0.0%	€0.00	0.1%	€0.03	0.2%	€0.15	0.1%	€0.04	0.0%	€0.00	0.1%	€0.28
Sub Total (Zone 2a)	17.4%	€11.29	70.9%	€21.63	14.1%	€10.44	15.0%	€5.84	5.9%	€4.48	18.8%	€53.39
Zone 2b												
Morrisons, Park Road, Ormskirk Town Centre	0.3%	€0.19	4.0%	€1.22	27.5%	€20.36	1.1%	€0.43	5.2%	€3.94	9.7%	€27.54
Aldi, Two Saints Place, Ormskirk Town Centre	0.8%	€0.52	2.7%	€0.82	17.3%	€12.81	0.7%	€0.27	1.1%	€0.83	5.7%	€16.19
M&S Foodhall, Aughton Street, Ormskirk Town Centre	0.0%	€0.00	1.8%	€0.55	4.4%	€3.26	0.0%	€0.00	1.5%	€1.14	1.8%	€5.11
Other, Ormskirk Town Centre	1.2%	€0.78	4.9%	€1.50	14.4%	€10.66	1.4%	€0.54	2.5%	€1.90	5.6%	€15.90
Total Ormskirk Town Centre	2.4%	€1.56	13.4%	€4.09	63.6%	€47.10	3.3%	€1.28	10.3%	€7.81	22.8%	€64.74
Other, Zone 2b	0.4%	€0.26	1.4%	€0.43	2.0%	€1.48	0.0%	€0.00	0.3%	€0.23	0.9%	€2.56
Sub Total (Zone 2b)	2.8%	€1.82	14.8%	€4.52	65.6%	€48.58	3.3%	€1.28	10.6%	€8.04	23.7%	€67.30
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%	€1.12	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%	€2.28	0.0%	€0.03	0.8%	€2.27
Sub Total (Zone 3a)	0.0%	€0.00	0.6%	€0.18	0.0%	€0.00	8.8%	€3.40	0.1%	€0.06	1.3%	€3.69
Zone 3b												
Asda, Ingram Road, Skelmersdale Town Centre	0.0%	€0.00	2.6%	€0.79	4.0%	€2.96	25.7%	€9.93	37.5%	€28.44	14.4%	€40.89
Aldi, Concourse Centre, Skelmersdale Town Centre	0.0%	€0.00	0.0%	€0.00	0.2%	€0.15	3.0%	€1.16	11.1%	€8.42	3.3%	€9.37
Iceland, Concourse Centre, Skelmersdale Town Centre	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	1.3%	€0.50	3.5%	€2.65	1.1%	€3.12
Other, Skelmersdale Town Centre	0.0%	€0.00	0.4%	€0.12	0.2%	€0.15	2.0%	€0.77	12.3%	€9.33	3.5%	€9.94
Total Skelmersdale Town Centre	0.0%	€0.00	3.0%	€0.92	4.4%	€3.26	31.9%	€12.33	64.4%	€48.85	22.3%	€63.32
Other, Zone 3b	0.0%	€0.00	0.5%	€0.15	0.2%	€0.15	1.4%	€0.54	6.1%	€4.63	1.8%	€5.11
Sub Total (Zone 3b)	0.0%	€0.00	3.5%	€1.07	4.6%	€3.41	33.3%	€12.87	70.5%	€53.47	24.1%	€68.44
SUB-TOTAL STUDY AREA	47.8%	€31.09	93.7%	€28.59	89.7%	€66.57	61.0%	€23.61	87.7%	€66.58	76.2%	€216.38
OUTSIDE STUDY AREA												
Outside Study Area, Sefton												
Morrisons, Winter Gardens, Southport Town Centre	7.9%	€5.13	0.0%	€0.00	0.2%	€0.15	0.3%	€0.12	0.2%	€0.15	1.9%	€5.40
Asda, Central Twelve Shopping Park, Southport TC	7.7%	€5.00	0.1%	€0.03	1.1%	€0.81	0.0%	€0.00	0.0%	€0.00	2.0%	€5.68
Sainsbury's, St Georges Place, Southport Town Centre	4.6%	€2.99	1.3%	€0.40	0.7%	€0.52	0.0%	€0.00	0.0%	€0.00	1.4%	€3.98
Lidl, Virginia Street, Southport Town Centre	6.4%	€4.15	0.2%	€0.06	0.1%	€0.07	0.0%	€0.00	0.0%	€0.00	1.5%	€4.26
Other, Southport Town Centre	4.4%	€2.86	0.7%	€0.21	0.3%	€0.22	0.0%	€0.00	0.7%	€0.53	1.3%	€3.69
Total Southport Town Centre	30.9%	€20.06	2.3%	€0.70	2.4%	€1.78	0.3%	€0.12	0.9%	€0.68	8.1%	€23.00
Aldi, Meols Cop Road, Southport	4.7%	€3.05	0.6%	€0.18	1.0%	€0.74	0.0%	€0.00	0.0%	€0.00	1.4%	€3.98
Other, Sefton	4.2%	€2.73	2.9%	€0.88	6.4%	€4.74	0.3%	€0.12	1.2%	€0.91	3.3%	€9.37
Sub Total (Sefton)	39.8%	€25.83	5.8%	€1.77	9.8%	€7.26	0.5%	€0.23	2.1%	€1.59	12.9%	€36.63
Outside Study Area, Wigan												
Wigan Town Centre	0.3%	€0.19	0.0%	€0.00	0.0%	€0.00	6.9%	€2.67	1.7%	€1.29	1.5%	€4.26
Asda Supercentre, Soho Street, Robin Park, Wigan	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	6.2%	€2.40	1.0%	€0.76	1.1%	€3.12
Aldi, Preston Road, Standish	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	10.7%	€4.13	0.0%	€0.00	1.5%	€4.26
Other, Wigan	1.8%	€1.17	0.0%	€0.00	0.0%	€0.00	7.7%	€2.98	5.5%	€4.17	2.9%	€8.24
Sub Total (Wigan)	2.1%	€1.36	0.0%	€0.00	0.0%	€0.00	31.5%	€12.17	8.2%	€6.22	6.9%	€19.59
Outside Study Area, South Ribble												
Leyland Town Centre	3.3%	€2.14	0.0%	€0.00	0.0%	€0.00	0.4%	€0.15	0.2%	€0.15	0.8%	€2.27
Other, South Ribble	2.9%	€1.88	0.0%	€0.00	0.0%	€0.00	0.5%	€0.19	0.0%	€0.00	0.7%	€1.99
Sub Total (South Ribble)	6.1%	€4.02	0.0%	€0.00	0.0%	€0.00	1.0%	€0.35	0.2%	€0.15	1.6%	€4.54
Outside Study Area, Other												
Sub Total (Other)	4.2%	€2.73	0.5%	€0.15	0.5%	€0.37	5.9%	€2.28	1.8%	€1.37	2.4%	€6.82
SUB-TOTAL OUTSIDE STUDY AREA	52.2%	€33.95	6.3%	€1.92	10.3%	€7.63	39.0%	€15.03	12.3%	€9.33	23.8%	€67.58
TOTAL	100.0%	€64.90	100.0%	€30.51	100.0%	€74.05	100.0%	€38.64	100.0%	€75.85	100.0%	€283.97

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 NEMS Household Survey which informs the West Lancashire Retail and Leisure Study (2018). See Retail Study Tables 5 and 6 'Convenience Goods Shopping Patterns' 2019 Prices

**PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT**

TABLE 4: CONVENIENCE GOODS SHOPPING PATTERNS IN TEST YEAR OF 2025 (€m and %)

DESTINATION	1 (Buffer)		2a (Buffer)		2b (Buffer)		3a (PSA)		3b (PSA)		Total Study Area		Inflow Allowance		Total Turnover (inc. Inflow Allowance)	
	(%)	(€m)	(%)	(€m)	(%)	(€m)	(%)	(€m)	(%)	(€m)	(%)	(€m)	(%)	(€m)	(€m)	
Zone 1																
Tesco, Meols Cop, Southport	11.2%	€7.24	3.9%	€1.19	5.1%	€3.78	0.3%	€0.12	0.7%	€0.53	4.5%	€12.78	-	-	-	€12.78
Booths, Station Road, Hesketh Bank Village Centre	8.7%	€5.61	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	1.9%	€5.40	-	-	-	€5.40
Tarleton Village Centre	5.6%	€3.63	0.0%	€0.00	0.5%	€0.37	0.0%	€0.00	0.0%	€0.00	1.4%	€3.98	-	-	-	€3.98
Other, Zone 1	2.3%	€1.49	0.0%	€0.00	0.0%	€0.00	0.3%	€0.12	0.0%	€0.00	0.6%	€1.70	-	-	-	€1.70
Sub Total (Zone 1)	27.7%	€17.98	3.9%	€1.19	5.6%	€4.15	0.7%	€0.23	0.7%	€0.53	8.4%	€23.85	-	-	-	€23.85
Zone 2a																
Tesco, Liverpool Road North, Burscough Town Centre	7.8%	€5.06	25.8%	€7.87	2.3%	€1.70	5.4%	€2.09	0.7%	€0.53	6.0%	€17.04	2.5%	€0.43	-	€17.46
Other, Burscough Town Centre	0.2%	€0.13	8.6%	€2.62	0.7%	€0.52	2.0%	€0.77	0.3%	€0.23	1.5%	€4.26	2.5%	€0.11	-	€4.37
Total Burscough Town Centre	7.9%	€5.13	34.4%	€10.50	3.0%	€2.22	7.5%	€2.90	1.0%	€0.76	7.5%	€21.30	-	€0.53	-	€21.83
Zone 2a																
Aldi, Ringtail Retail Park, Burscough	8.0%	€5.19	26.8%	€8.18	8.3%	€6.15	3.6%	€1.39	4.4%	€3.34	8.5%	€24.14	2.5%	€0.60	-	€24.74
Booths, Ringtail Retail Park Burscough	1.5%	€0.97	9.6%	€2.93	2.6%	€1.93	3.9%	€1.51	0.5%	€0.38	2.7%	€7.67	2.5%	€0.19	-	€7.86
Other, Zone 2a	0.0%	€0.00	0.1%	€0.03	0.2%	€0.15	0.1%	€0.04	0.0%	€0.00	0.1%	€0.28	2.5%	€0.01	-	€0.29
Sub Total (Zone 2a)	17.4%	€11.29	70.9%	€21.63	14.1%	€10.44	15.0%	€5.83	5.9%	€4.47	18.8%	€53.38	-	€1.33	-	€54.72
Zone 2b																
Morrisons, Park Road, Ormskirk Town Centre	0.3%	€0.19	4.0%	€1.22	27.5%	€20.36	1.1%	€0.43	5.2%	€3.94	9.7%	€27.54	2.5%	€0.69	-	€28.23
Aldi, Two Saints Place, Ormskirk Town Centre	0.8%	€0.52	2.7%	€0.82	17.3%	€12.81	0.7%	€0.27	1.1%	€0.83	5.7%	€16.19	2.5%	€0.40	-	€16.59
M&S Foodhall, Aughton Street, Ormskirk Town Centre	0.0%	€0.00	1.8%	€0.55	4.4%	€3.26	0.0%	€0.00	1.5%	€1.14	1.8%	€5.11	2.5%	€0.13	-	€5.24
Other, Ormskirk Town Centre	1.2%	€0.78	4.9%	€1.50	14.4%	€10.66	1.4%	€0.54	2.5%	€1.90	5.6%	€15.90	2.5%	€0.40	-	€16.30
Total Ormskirk Town Centre	2.4%	€1.56	13.4%	€4.09	63.6%	€47.10	3.3%	€1.28	10.3%	€7.81	22.8%	€64.74	-	€1.62	-	€66.36
Other, Zone 2b	0.4%	€0.26	1.4%	€0.43	2.0%	€1.48	0.0%	€0.00	0.3%	€0.23	0.9%	€2.56	2.5%	€0.06	-	€2.56
Sub Total (Zone 2b)	2.8%	€1.82	14.8%	€4.52	65.6%	€48.58	3.3%	€1.28	10.6%	€8.04	23.7%	€67.30	-	€1.68	-	€68.91
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%	€1.12	0.0%	€0.03	0.5%	€1.42	10.0%	€0.14	-	€1.56
Other, Zone 3a	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	5.9%	€2.28	0.0%	€0.03	0.8%	€2.27	2.5%	€0.06	-	€2.33
Sub Total (Zone 3a)	0.0%	€0.00	0.6%	€0.18	0.0%	€0.00	8.8%	€3.40	0.1%	€0.06	1.3%	€3.69	-	€0.20	-	€3.89
Zone 3b																
Asda, Ingram Road, Skelmersdale Town Centre	0.0%	€0.00	2.6%	€0.79	4.0%	€2.96	25.7%	€9.93	37.5%	€28.44	14.4%	€40.89	10.0%	€4.09	-	€44.98
Aldi, Concourse Centre, Skelmersdale Town Centre	0.0%	€0.00	0.0%	€0.00	0.2%	€0.15	3.0%	€1.16	11.1%	€8.42	3.3%	€9.37	2.5%	€0.23	-	€9.60
Iceland, Concourse Centre, Skelmersdale Town Centre	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	1.3%	€0.50	3.5%	€2.65	1.1%	€3.12	2.5%	€0.08	-	€3.20
Other, Skelmersdale Town Centre	0.0%	€0.00	0.4%	€0.12	0.2%	€0.15	2.0%	€0.77	12.3%	€9.33	3.5%	€9.94	2.5%	€0.25	-	€10.19
Total Skelmersdale Town Centre	0.0%	€0.00	3.0%	€0.92	4.4%	€3.26	31.9%	€12.33	64.4%	€48.84	22.3%	€63.32	-	€4.65	-	€67.97
Other, Zone 3b	0.0%	€0.00	0.5%	€0.15	0.2%	€0.15	1.4%	€0.54	6.1%	€4.63	1.8%	€5.11	2.5%	€0.13	-	€5.11
Sub Total (Zone 3b)	0.0%	€0.00	3.5%	€1.07	4.6%	€3.41	33.3%	€12.87	70.5%	€53.47	24.1%	€68.43	-	€4.78	-	€73.08
SUB-TOTAL STUDY AREA	47.8%	€31.09	93.7%	€28.59	89.7%	€66.57	61.0%	€23.61	87.7%	€66.58	76.2%	€216.37	-	€8.09	-	€224.45
OUTSIDE STUDY AREA																
Outside Study Area, Sefton																
Morrisons, Winter Gardens, Southport Town Centre	7.9%	€5.13	0.0%	€0.00	0.2%	€0.15	0.3%	€0.12	0.2%	€0.15	1.9%	€5.40	-	-	-	€5.40
Asda, Central Twelve Shopping Park, Southport TC	7.7%	€5.00	0.1%	€0.03	1.1%	€0.81	0.0%	€0.00	0.0%	€0.00	2.0%	€3.68	-	-	-	€3.68
Sainsbury's, St Georges Place, Southport Town Centre	4.6%	€2.99	1.3%	€0.40	0.7%	€0.52	0.0%	€0.00	0.0%	€0.00	1.4%	€3.98	-	-	-	€3.98
Lidl, Virginia Street, Southport Town Centre	6.4%	€4.15	0.2%	€0.06	0.1%	€0.07	0.0%	€0.00	0.0%	€0.00	1.5%	€4.26	-	-	-	€4.26
Other, Southport Town Centre	4.4%	€2.86	0.7%	€0.21	0.3%	€0.22	0.0%	€0.00	0.7%	€0.53	1.3%	€3.69	-	-	-	€3.69
Total Southport Town Centre	30.9%	€20.05	2.3%	€0.70	2.4%	€1.78	0.3%	€0.12	0.9%	€0.68	8.1%	€23.00	-	-	-	€23.00
Aldi, Meols Cop Road, Southport	4.7%	€3.05	0.6%	€0.18	1.0%	€0.74	0.0%	€0.00	0.0%	€0.00	1.4%	€3.98	-	-	-	€3.98
Other, Sefton	4.2%	€2.73	2.9%	€0.88	6.4%	€4.74	0.3%	€0.12	1.2%	€0.91	3.3%	€9.37	-	-	-	€9.37
Sub Total (Sefton)	39.8%	€25.83	5.8%	€1.77	9.8%	€7.26	0.5%	€0.23	2.1%	€1.59	12.9%	€36.63	-	-	-	€36.63
Outside Study Area, Wigan																
Wigan Town Centre	0.3%	€0.19	0.0%	€0.00	0.0%	€0.00	6.9%	€2.67	1.7%	€1.29	1.5%	€4.26	-	-	-	€4.26
Asda Supercentre, Soho Street, Robin Park, Wigan	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	6.2%	€2.40	1.0%	€0.76	1.1%	€3.12	-	-	-	€3.12
Aldi, Preston Road, Standish	0.0%	€0.00	0.0%	€0.00	0.0%	€0.00	10.7%	€4.13	0.0%	€0.00	1.5%	€4.26	-	-	-	€4.26
Other, Wigan	1.8%	€1.17	0.0%	€0.00	0.0%	€0.00	7.7%	€2.98	5.5%	€4.17	2.9%	€8.23	-	-	-	€8.23
Sub Total (Wigan)	2.1%	€1.36	0.0%	€0.00	0.0%	€0.00	31.5%	€12.17	8.2%	€6.22	6.9%	€19.59	-	-	-	€19.59
Outside Study Area, South Ribble																
Layland Town Centre	3.3%	€2.14	0.0%	€0.00	0.0%	€0.00	0.4%	€0.15	0.2%	€0.15	0.8%	€2.27	-	-	-	€2.27
Other, South Ribble	2.9%	€1.88	0.0%	€0.00	0.0%	€0.00	0.5%	€0.19	0.0%	€0.00	0.7%	€1.99	-	-	-	€1.99
Sub Total (South Ribble)	6.1%	€4.02	0.0%	€0.00	0.0%	€0.00	1.0%	€0.35	0.2%	€0.15	1.6%	€4.54	-	-	-	€4.54
Outside Study Area, Other																
Sub Total (Other)	4.2%	€2.73	0.5%	€0.15	0.5%	€0.37	5.9%	€2.28	1.8%	€1.37	2.4%	€6.81	-	-	-	€6.81
SUB-TOTAL OUTSIDE STUDY AREA	52.2%	€33.94	6.3%	€1.92	10.3%	€7.63	39.0%	€15.03	12.3%	€9.33	23.8%	€67.58	-	-	-	€67.58
TOTAL	100.0%	€64.90	100.0%	€30.51	100.0%	€74.05	100.0%	€38.64	100.0%	€75.85	100.0%	€283.95	-	€8.09	-	€292.03

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 NEMS Household Survey which informs the West Lancashire Retail and Leisure Study (2018). See Retail Study Tables 5 and 6 'Convenience Goods Shopping Patterns'

2019 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	2025
Zone 2a									
Yew Tree Farm, Burscough	236	£10,000	£2.36	£2.49	£2.37	£2.39	£2.39	£2.39	£2.39
Zone 2b									
Ropers Arms, Wigan Road, Ormskirk	222	£10,000	£2.22	£2.34	£2.23	£2.25	£2.25	£2.25	£2.25
Briars Lane Garage, Ormskirk	173	£7,500	£1.30	£1.37	£1.30	£1.31	£1.31	£1.31	£1.31
Zone 3b									
Lidl, Tawd Valley Centre	1,012	£9,814	£9.93	£10.47	£9.97	£10.05	£10.05	£10.05	£10.05
B&M, Tawd Valley Centre	497	£3,635	£1.81	£1.90	£1.81	£1.83	£1.83	£1.83	£1.83
Total	2,140	-	£17.62	£18.57	£17.68	£17.82	£17.82	£17.82	£17.82

Notes:

- Commitments and their floorspaces in Zones 2a and 2b taken from the West Lancashire Retail and Leisure Study (2018)
- Sales densities for Yew Tree Farm, Ropers Arms, and Briars Lane Garage taken from West Lancashire Retail and Leisure Study (2018) (at 2019 prices)
- Floorspace figures for uses at the Tawd Valley Centre are derived from the retail impact assessment prepared in support of application Ref. 2018/0898/FUL (Approved Sept 2019)
- Convenience goods sales densities for both Lidl and B&M sourced from Mintel 2021 UK Retail Rankings (in 2019 prices)
- Turnovers projected forwards using Experian forecast sales densities from Figures 4a and 4b (Page 14) of Experian Retail Planner Briefing Note 18 (October 2020) (Latest available at the time of preparation)

2019 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 6(a): TAWD VALLEY CENTRE SCHEME (LIDL AND B&M) - CONVENIENCE GOODS TRADE DRAW (2025)

DESTINATION	2a (Buffer)	2b (Buffer)	3a (PCA)	3b (PCA)	TOTAL
Trade Drawn From Zones (%)	5.0%	5.0%	20.0%	70.0%	100.0%
Trade Drawn From Zones (£)	£0.58	£0.58	£2.32	£8.10	£11.58

TABLE 6(b): TAWD VALLEY CENTRE SCHEME (LIDL AND B&M) - CONVENIENCE GOODS TRADE ALLOCATION (2025)

DESTINATION	2a (Buffer)		2b (Buffer)		3a (PCA)		3b (PCA)		Total	
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)
Zone 1										
Tesco, Meols Cop, Southport	0.5%	£0.00	2.5%	£0.01	1.0%	£0.02	1.0%	£0.08	1.1%	£0.12
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)	0.5%	£0.00	2.5%	£0.01	1.0%	£0.02	1.0%	£0.08	1.1%	£0.12
Zone 2a										
Tesco, Liverpool Road North, Burscough Town Centre	30.0%	£0.17	2.5%	£0.01	5.0%	£0.12	1.0%	£0.08	3.3%	£0.38
Other, Burscough Town Centre	7.5%	£0.04	1.0%	£0.01	0.0%	£0.00	0.5%	£0.04	0.8%	£0.09
Total Burscough Town Centre	37.5%	£0.22	3.5%	£0.02	5.0%	£0.12	1.5%	£0.12	4.1%	£0.47
Aldi, Ringtail Retail Park, Burscough	32.5%	£0.19	15.0%	£0.09	7.5%	£0.17	7.5%	£0.61	9.1%	£1.06
Booths, Ringtail Retail Park Burscough	2.5%	£0.01	2.5%	£0.01	2.5%	£0.06	0.0%	£0.00	0.8%	£0.09
Other, Zone 2a	1.0%	£0.01	0.5%	£0.00	0.0%	£0.00	0.0%	£0.00	0.1%	£0.01
Sub Total (Zone 2a)	73.5%	£0.43	21.5%	£0.12	15.0%	£0.35	9.0%	£0.73	14.1%	£1.63
Zone 2b										
Morrisons, Park Road, Ormskirk Town Centre	7.5%	£0.04	30.0%	£0.17	1.0%	£0.02	5.0%	£0.41	5.6%	£0.65
Aldi, Two Saints Place, Ormskirk Town Centre	2.5%	£0.01	12.5%	£0.07	1.0%	£0.02	2.5%	£0.20	2.7%	£0.31
M&S Foodhall, Aughton Street, Ormskirk Town Centre	0.0%	£0.00	2.5%	£0.01	0.0%	£0.00	0.5%	£0.04	0.5%	£0.05
Other, Ormskirk Town Centre	5.0%	£0.03	12.5%	£0.07	0.0%	£0.00	0.0%	£0.00	0.9%	£0.10
Total Ormskirk Town Centre	15.0%	£0.09	57.5%	£0.33	2.0%	£0.05	8.0%	£0.65	9.6%	£1.11
Other, Zone 2b	1.0%	£0.01	2.5%	£0.01	0.0%	£0.00	1.0%	£0.08	0.9%	£0.10
Sub Total (Zone 2b)	16.0%	£0.09	60.0%	£0.35	2.0%	£0.05	9.0%	£0.73	10.5%	£1.22
Zone 3a										
Co op Food, Ormskirk Road, Up Holland Village Centre	0.0%	£0.00	0.0%	£0.00	2.5%	£0.06	0.5%	£0.04	0.9%	£0.10
Other, Zone 3a	0.0%	£0.00	0.0%	£0.00	2.5%	£0.06	0.5%	£0.04	0.9%	£0.10
Sub Total (Zone 3a)	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	1.0%	£0.08	1.7%	£0.20
Zone 3b										
Asda, Ingram Road, Skelmersdale Town Centre	5.0%	£0.03	7.5%	£0.04	25.0%	£0.58	37.5%	£3.04	31.9%	£3.69
Aldi, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	1.0%	£0.01	15.0%	£0.35	22.5%	£1.82	18.8%	£2.18
Iceland, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	2.0%	£0.05	2.5%	£0.20	2.2%	£0.25
Other, Skelmersdale Town Centre	0.0%	£0.00	0.5%	£0.00	2.0%	£0.05	5.0%	£0.41	3.9%	£0.45
Tawd Valley Centre, 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	5.0%	£0.03	9.0%	£0.05	44.0%	£1.02	67.5%	£5.47	56.8%	£6.57
Other, Zone 3b	0.0%	£0.00	1.0%	£0.01	1.0%	£0.02	2.5%	£0.20	2.0%	£0.23
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)	5.0%	£0.03	10.0%	£0.06	45.0%	£1.04	70.0%	£5.67	58.8%	£6.80
SUB-TOTAL STUDY AREA	95.0%	£0.55	94.0%	£0.54	68.0%	£1.57	90.0%	£7.29	86.1%	£9.96
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%	£0.00	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	0.0%	£0.00
Total Southport Town Centre	0.0%	£0.00	0.5%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Aldi, Meols Cop Road, Southport	2.5%	£0.01	2.5%	£0.01	0.0%	£0.00	0.0%	£0.00	0.3%	£0.03
Other, Sefton	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00	1.0%	£0.08	0.7%	£0.08
Sub Total (Sefton)	2.5%	£0.01	3.0%	£0.02	0.0%	£0.00	1.0%	£0.08	1.0%	£0.11
Outside Study Area, Wigan										
Wigan Town Centre	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	1.0%	£0.08	1.7%	£0.20
Asda Supercentre, Soho Street, Robin Park, Wigan	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	1.0%	£0.08	1.7%	£0.20
Aldi, Preston Road, Standish	0.0%	£0.00	0.5%	£0.00	15.0%	£0.35	1.0%	£0.08	3.7%	£0.43
Other, Wigan	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	5.0%	£0.41	4.5%	£0.52
Sub Total (Wigan)	0.0%	£0.00	0.5%	£0.00	30.0%	£0.69	8.0%	£0.65	11.6%	£1.35
Outside Study Area, South Ribble										
Leyland Town Centre	0.0%	£0.00	0.0%	£0.00	0.5%	£0.01	0.0%	£0.00	0.1%	£0.01
Other, South Ribble	0.0%	£0.00	0.0%	£0.00	0.5%	£0.01	0.0%	£0.00	0.1%	£0.01
Sub Total (South Ribble)	0.0%	£0.00	0.0%	£0.00	1.0%	£0.02	0.0%	£0.00	0.2%	£0.02
Outside Study Area, Other										
Sub Total (Other)	2.5%	£0.01	2.5%	£0.01	1.0%	£0.02	1.0%	£0.08	1.2%	£0.13
SUB-TOTAL OUTSIDE STUDY AREA	5.0%	£0.03	6.0%	£0.03	32.0%	£0.74	10.0%	£0.81	14.0%	£1.61
TOTAL	100.0%	£0.58	100.0%	£0.58	100.0%	£2.32	100.0%	£8.10	100.0%	£11.58

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
- Study Zone 1 is not featured as no trade is anticipated to be drawn from this zone to the proposed development
- 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 Lidl and B&M for 2025 sourced from Table 5 (Committed Developments and Turnover).
- 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)

2019 Prices

**PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT**

TABLE 7(a) REMAINING COMMITMENTS ZONES 2A AND 2B - CONVENIENCE GOODS TURNOVER (2025)

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 7(b) REMAINING COMMITMENTS ZONES 2A AND 2B - CONVENIENCE GOODS TRADE ALLOCATION (2025)

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%	£0.67
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%	£0.81	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%	£3.38
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
Tawd Valley Centre, 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:

- 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. 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)
- c. Convenience goods turnover of other commitments for 2025 sourced from Table 5 (Committed Developments and Turnover)
- d. 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)

2019 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 8(a): PROPOSED ALDI FOODSTORE CONVENIENCE GOODS TRADE DRAW (2025)

DESTINATION	2a (Buffer)	2b (Buffer)	3a (PCA)	3b (PCA)	TOTAL
Trade Drawn From Zones (%)	5.0%	5.0%	20.0%	70.0%	100.0%
Trade Drawn From Zones (£)	£0.60	£0.60	£2.39	£8.36	£11.94

TABLE 8(b): PROPOSED ALDI FOODSTORE CONVENIENCE GOODS TRADE ALLOCATION (2025)

DESTINATION	2a (Buffer)		2b (Buffer)		3a (PCA)		3b (PCA)		Total	
	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)	(%)	(£m)
Zone 1										
Tesco, Meols Cop, Southport	0.5%	£0.00	2.5%	£0.01	0.5%	£0.01	0.5%	£0.04	0.6%	£0.07
Booths, Station Road, Heskeith 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)	0.5%	£0.00	2.5%	£0.01	0.5%	£0.01	0.5%	£0.04	0.6%	£0.07
Zone 2a										
Tesco, Liverpool Road North, Burscough Town Centre	30.0%	£0.18	2.5%	£0.01	5.0%	£0.12	1.0%	£0.08	3.3%	£0.40
Other, Burscough Town Centre	7.5%	£0.04	1.0%	£0.01	2.5%	£0.06	0.5%	£0.04	1.3%	£0.15
Total Burscough Town Centre	37.5%	£0.22	3.5%	£0.02	7.5%	£0.18	1.5%	£0.13	4.6%	£0.55
Aldi, Ringtail Retail Park, Burscough	32.5%	£0.19	15.0%	£0.09	7.5%	£0.18	10.0%	£0.84	10.9%	£1.30
Booths, Ringtail Retail Park Burscough	2.5%	£0.01	2.5%	£0.01	2.5%	£0.06	0.5%	£0.04	1.1%	£0.13
Other, Zone 2a	1.0%	£0.01	0.5%	£0.00	0.0%	£0.00	0.0%	£0.00	0.1%	£0.01
Sub Total (Zone 2a)	73.5%	£0.44	21.5%	£0.13	17.5%	£0.42	12.0%	£1.00	16.7%	£1.99
Zone 2b										
Morrisons, Park Road, Ormskirk Town Centre	7.5%	£0.04	27.5%	£0.16	1.0%	£0.02	5.0%	£0.42	5.5%	£0.65
Aldi, Two Saints Place, Ormskirk Town Centre	2.5%	£0.01	15.0%	£0.09	1.0%	£0.02	5.0%	£0.42	4.6%	£0.55
M&S Foodhall, Aughton Street, Ormskirk Town Centre	0.0%	£0.00	2.5%	£0.01	0.0%	£0.00	0.5%	£0.04	0.5%	£0.06
Other, Ormskirk Town Centre	5.0%	£0.03	10.0%	£0.06	1.0%	£0.02	0.0%	£0.00	1.0%	£0.11
Total Ormskirk Town Centre	15.0%	£0.09	55.0%	£0.33	3.0%	£0.07	10.5%	£0.88	11.5%	£1.37
Other, Zone 2b	1.0%	£0.01	2.5%	£0.01	0.0%	£0.00	0.5%	£0.04	0.5%	£0.06
Sub Total (Zone 2b)	16.0%	£0.10	57.5%	£0.34	3.0%	£0.07	11.0%	£0.92	12.0%	£1.43
Zone 3a										
Co op Food, Ormskirk Road, Up Holland Village Centre	0.0%	£0.00	0.0%	£0.00	2.5%	£0.06	0.0%	£0.00	0.5%	£0.06
Other, Zone 3a	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	0.0%	£0.00	1.0%	£0.12
Sub Total (Zone 3a)	0.0%	£0.00	0.0%	£0.00	7.5%	£0.18	0.0%	£0.00	1.5%	£0.18
Zone 3b										
Asda, Ingram Road, Skelmersdale Town Centre	5.0%	£0.03	7.5%	£0.04	15.0%	£0.36	27.5%	£2.30	22.9%	£2.73
Aldi, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	1.0%	£0.01	15.0%	£0.36	22.5%	£1.88	18.8%	£2.24
Iceland, Concourse Centre, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	2.0%	£0.05	2.5%	£0.21	2.2%	£0.26
Other, Skelmersdale Town Centre	0.0%	£0.00	2.5%	£0.01	2.0%	£0.05	5.0%	£0.42	4.0%	£0.48
Tawd Valley Centre, Skelmersdale Town Centre	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	7.5%	£0.63	6.3%	£0.75
Total Skelmersdale Town Centre	5.0%	£0.03	11.0%	£0.07	39.0%	£0.93	65.0%	£5.43	54.1%	£6.46
Other, Zone 3b	0.0%	£0.00	1.0%	£0.01	1.0%	£0.02	2.5%	£0.21	2.0%	£0.24
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)	5.0%	£0.03	12.0%	£0.07	40.0%	£0.95	67.5%	£5.64	56.1%	£6.70
SUB-TOTAL STUDY AREA	95.0%	£0.57	93.5%	£0.56	68.5%	£1.64	91.0%	£7.60	86.8%	£10.36
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%	£0.00	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	0.0%	£0.00
Total Southport Town Centre	0.0%	£0.00	0.5%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Aldi, Meols Cop Road, Southport	2.5%	£0.01	2.5%	£0.01	0.0%	£0.00	0.0%	£0.00	0.3%	£0.03
Other, Sefton	0.0%	£0.00	0.5%	£0.00	0.0%	£0.00	0.0%	£0.00	0.0%	£0.00
Sub Total (Sefton)	2.5%	£0.01	3.5%	£0.02	0.0%	£0.00	0.0%	£0.00	0.3%	£0.04
Outside Study Area, Wigan										
Wigan Town Centre	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	1.0%	£0.08	1.7%	£0.20
Asda Supercentre, Soho Street, Robin Park, Wigan	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	1.0%	£0.08	1.7%	£0.20
Aldi, Preston Road, Standish	0.0%	£0.00	0.5%	£0.00	15.0%	£0.36	1.0%	£0.08	3.7%	£0.44
Other, Wigan	0.0%	£0.00	0.0%	£0.00	5.0%	£0.12	5.0%	£0.42	4.5%	£0.54
Sub Total (Wigan)	0.0%	£0.00	0.5%	£0.00	30.0%	£0.72	8.0%	£0.67	11.6%	£1.39
Outside Study Area, South Ribble										
Leyland Town Centre	0.0%	£0.00	0.0%	£0.00	0.5%	£0.01	0.0%	£0.00	0.1%	£0.01
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%	£0.01	0.0%	£0.00	0.1%	£0.01
Outside Study Area, Other										
Sub Total (Other)	2.5%	£0.01	2.5%	£0.01	1.0%	£0.02	1.0%	£0.08	1.2%	£0.14
SUB-TOTAL OUTSIDE STUDY AREA	5.0%	£0.03	6.5%	£0.04	31.5%	£0.75	9.0%	£0.75	13.2%	£1.57
TOTAL	100.0%	£0.60	100.0%	£0.60	100.0%	£2.39	100.0%	£8.36	100.0%	£11.94

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 2025 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)

2019 Prices

PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT

TABLE 9: CONVENIENCE GOODS TRADING IMPACT 2025 (€m)

DESTINATION	Total Turnover (inc. Inflow Allowance) (With Tawd Valley) 2025	Tawd Valley Centre Skelmersdale Sulus Impact		Commitments Zones 2a and 2b Sulus Impact		Total Turnover Following Commitments	Aldi Foodstore High Street Sulus Impact		Total Convenience Turnover Following Aldi and Commitments	Cumulative Trading Impact	
		(€m)	(%)	(€m)	(%)		(€m)	(%)		(€m)	(%)
Zone 1											
Tesco, Meols Cop, Southport	€12.78	€0.12	-1.0%	€0.00	0.0%	€12.66	€0.07	-0.6%	€12.58	€0.19	-1.5%
Booths, Station Road, Hesketh Bank Village Centre	€5.40	€0.00	0.0%	€0.00	0.0%	€5.40	€0.00	0.0%	€5.40	€0.00	0.0%
Tarleton Village Centre	€3.98	€0.00	0.0%	€0.00	0.0%	€3.98	€0.00	0.0%	€3.98	€0.00	0.0%
Other, Zone 1	€1.70	€0.00	0.0%	€0.00	0.0%	€1.70	€0.00	0.0%	€1.70	€0.00	0.0%
Sub Total (Zone 1)	€23.85	€0.12	-0.5%	€0.00	0.0%	€23.73	€0.07	-0.3%	€23.66	€0.19	-0.8%
Zone 2a											
Tesco, Liverpool Road North, Burscough Town Centre	€17.46	€0.38	-2.2%	€0.67	-3.9%	€16.40	€0.40	-2.4%	€16.01	€1.46	-8.3%
Other, Burscough Town Centre	€4.37	€0.09	-2.1%	€0.19	-4.4%	€4.08	€0.15	-3.7%	€3.93	€0.43	-9.9%
Total Burscough Town Centre	€21.83	€0.47	-2.2%	€0.87	-4.0%	€20.49	€0.55	-2.7%	€19.94	€1.89	-8.7%
Aldi, Ringtail Retail Park, Burscough	€24.74	€1.06	-4.3%	€0.67	-2.7%	€23.01	€1.30	-5.6%	€21.72	€3.02	-12.2%
Booths, Ringtail Retail Park Burscough	€7.86	€0.09	-1.1%	€0.55	-7.0%	€7.22	€0.13	-1.8%	€7.09	€0.77	-9.8%
Other, Zone 2a	€0.29	€0.01	-3.0%	€0.00	0.0%	€0.28	€0.01	-3.2%	€0.27	€0.02	-6.1%
Sub Total (Zone 2a)	€54.72	€1.63	-3.0%	€2.09	-3.8%	€51.00	€1.99	-3.9%	€49.02	€5.70	-10.4%
Zone 2b											
Morrisons, Park Road, Ormskirk Town Centre	€28.23	€0.65	-2.3%	€1.50	-5.3%	€26.08	€0.65	-2.5%	€25.43	€2.80	-9.9%
Aldi, Two Saints Place, Ormskirk Town Centre	€16.59	€0.31	-1.9%	€0.67	-4.0%	€15.61	€0.55	-3.5%	€15.07	€1.52	-9.2%
M&S Foodhall, Aughton Street, Ormskirk Town Centre	€5.24	€0.05	-1.0%	€0.41	-7.7%	€4.78	€0.06	-1.2%	€4.72	€0.52	-9.9%
Other, Ormskirk Town Centre	€16.30	€0.10	-0.6%	€0.81	-5.0%	€15.39	€0.11	-0.7%	€15.27	€1.02	-6.3%
Total Ormskirk Town Centre	€66.36	€1.11	-1.7%	€3.38	-5.1%	€61.86	€1.37	-2.2%	€60.49	€5.87	-8.8%
Other, Zone 2b	€2.56	€0.10	-4.0%	€0.03	-1.4%	€2.42	€0.06	-2.6%	€2.36	€0.20	-7.8%
Sub Total (Zone 2b)	€68.91	€1.22	-1.8%	€3.42	-5.0%	€64.28	€1.43	-2.2%	€62.85	€6.06	-8.8%
Zone 3a											
Co op Food, Ormskirk Road, Up Holland Village Centre	€1.56	€0.10	-6.3%	€0.00	0.0%	€1.46	€0.06	-4.1%	€1.40	€0.16	-10.1%
Other, Zone 3a	€2.33	€0.10	-4.2%	€0.00	0.0%	€2.23	€0.12	-5.4%	€2.11	€0.22	-9.4%
Sub Total (Zone 3a)	€3.89	€0.20	-5.1%	€0.00	0.0%	€3.69	€0.18	-4.8%	€3.51	€0.38	-9.7%
Zone 3b											
Asda, Ingram Road, Skelmersdale Town Centre	€44.98	€3.69	-8.2%	€0.00	0.0%	€41.29	€2.73	-6.6%	€38.56	€6.42	-14.3%
Aldi, Concourse Centre, Skelmersdale Town Centre	€9.60	€2.18	-22.7%	€0.00	0.0%	€7.43	€2.24	-30.2%	€5.18	€4.42	-46.0%
Iceland, Concourse Centre, Skelmersdale Town Centre	€3.20	€0.25	-7.8%	€0.00	0.0%	€2.95	€0.26	-8.7%	€2.70	€0.51	-15.8%
Other, Skelmersdale Town Centre	€10.19	€0.45	-4.5%	€0.00	0.0%	€9.73	€0.48	-4.9%	€9.25	€0.93	-9.2%
Tawd Valley Centre, Skelmersdale Town Centre	-	-	-	-	-	€11.87	€0.75	-6.3%	€11.13	€0.75	+93.7%
Total Skelmersdale Town Centre	€67.97	€6.57	-9.7%	€0.00	0.0%	€73.27	€6.46	-8.8%	€66.82	€11.15	-1.7%
Other, Zone 3b	€5.11	€0.23	-4.5%	€0.00	0.0%	€4.88	€0.24	-4.9%	€4.64	€0.47	-9.2%
Aldi, High Street, Skelmersdale	-	-	-	-	-	-	-	-	€12.24	-	+100%
Sub Total (Zone 3b)	€73.08	€6.80	-9.3%	€0.00	0.0%	€78.15	€6.70	-8.6%	€83.70	€1.62	-2.2%
SUB-TOTAL STUDY AREA	€224.45	€9.96	-4.4%	€5.51	-2.5%	€220.86	€10.36	-4.7%	€222.74	-	-
OUTSIDE STUDY AREA											
Outside Study Area, Sefton											
Morrisons, Winter Gardens, Southport Town Centre	€5.40	€0.00	0.0%	€0.00	0.0%	€5.40	€0.00	0.0%	€5.40	€0.00	0.0%
Asda, Central Twelve Shopping Park, Southport TC	€5.68	€0.00	0.0%	€0.00	0.0%	€5.68	€0.00	0.0%	€5.68	€0.00	0.0%
Sainsbury's, St. Georges Place, Southport Town Centre	€3.98	€0.00	0.0%	€0.00	0.0%	€3.98	€0.00	0.0%	€3.98	€0.00	0.0%
Lidl, Virginia Street, Southport Town Centre	€4.26	€0.00	-0.1%	€0.00	0.0%	€4.26	€0.00	-0.1%	€4.25	€0.01	-0.1%
Other, Southport Town Centre	€3.69	€0.00	0.0%	€0.00	0.0%	€3.69	€0.00	0.0%	€3.69	€0.00	0.0%
Total Southport Town Centre	€23.00	€0.00	0.0%	€0.00	0.0%	€23.00	€0.00	0.0%	€22.99	€0.01	0.0%
Aldi, Meols Cop Road, Southport	€3.98	€0.03	-0.7%	€0.00	0.0%	€3.95	€0.03	-0.8%	€3.92	€0.06	-1.5%
Other, Sefton	€9.37	€0.08	-0.9%	€0.00	0.0%	€9.29	€0.00	0.0%	€9.29	€0.08	-0.9%
Sub Total (Sefton)	€36.63	€0.11	-0.3%	€0.00	0.0%	€36.23	€0.04	-0.1%	€36.20	€0.15	-0.4%
Outside Study Area, Wigan											
Wigan Town Centre	€4.26	€0.20	-4.6%	€0.00	0.0%	€4.06	€0.20	-5.0%	€3.86	€0.40	-9.4%
Asda Supercentre, Soho Street, Robin Park, Wigan	€3.12	€0.20	-6.3%	€0.00	0.0%	€2.93	€0.20	-6.9%	€2.72	€0.40	-12.8%
Aldi, Preston Road, Standish	€4.26	€0.43	-10.1%	€0.00	0.0%	€3.83	€0.44	-11.6%	€3.38	€0.88	-20.6%
Other, Wigan	€8.23	€0.52	-6.3%	€0.00	0.0%	€7.71	€0.54	-7.0%	€7.18	€1.06	-12.8%
Sub Total (Wigan)	€19.59	€1.35	-6.9%	€0.00	0.0%	€18.53	€1.39	-7.5%	€17.14	€2.73	-14.0%
Outside Study Area, South Ribble											
Leyland Town Centre	€2.27	€0.01	-0.5%	€0.00	0.0%	€2.26	€0.01	-0.5%	€2.25	€0.02	-1.0%
Other, South Ribble	€1.99	€0.01	-0.6%	€0.00	0.0%	€1.98	€0.00	0.0%	€1.98	€0.01	-0.6%
Sub Total (South Ribble)	€4.54	€0.02	-0.5%	€0.00	0.0%	€4.24	€0.01	-0.3%	€4.22	€0.04	-0.8%
Outside Study Area, Other											
Sub Total (Other)	€6.81	€0.13	-2.0%	€0.29	-4.3%	€6.39	€0.14	-2.1%	€6.25	€0.56	-8.2%
SUB-TOTAL OUTSIDE STUDY AREA	€67.58	€1.61	-	€0.29	-	€65.39	€1.57	-	€63.82	-	-
TOTAL	€292.03	€11.58	-	€5.80	-	€286.25	€11.94	-	€286.56	-	-

Notes:

- a. Study Area Derived Turnover for 2025 sourced from Table 4 (Convenience Goods Turnover 2025)
- b. Turnover of proposed retail development and commitments taken from Tables 1 and 5 and allows for changes in turnover from Figures 4a and 4b (Page 14) of Experian Retail Planner Briefing Note 18 (October 2020)
- c. Trade diversion figures for Aldi foodstore and commitments taken from Tables 6 to 8
- d. 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 opposed to purely study area derived total
- e. Anticipated trade diversion of the proposal based on existing shopping patterns and geographic location of existing and proposed provision (as identified by West Lancashire Retail and Leisure Study 2018)

2019 Prices

**PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT**

TABLE 10(a): POPULATION WITHIN EACH ZONE OF CATCHMENT AREA

ZONE	POPULATION								
	2019	2020	2021	2022	2023	2024	2025	2026	2027
1 (Buffer)	28,969	29,026	29,065	29,111	29,166	29,231	29,298	29,364	29,429
2a (Buffer)	13,456	13,483	13,500	13,522	13,548	13,578	13,609	13,639	13,670
2b (Buffer)	33,312	33,378	33,422	33,475	33,539	33,613	33,691	33,766	33,841
3a (PSA)	16,671	16,704	16,726	16,753	16,785	16,822	16,861	16,898	16,936
3b (PSA)	36,887	36,960	37,009	37,067	37,138	37,221	37,306	37,390	37,473
TOTAL	129,295	129,550	129,721	129,927	130,176	130,464	130,765	131,058	131,350

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 report (November 2021 Report)
- c. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

TABLE 10(b): PER CAPITA COMPARISON EXPENDITURE WITHIN EACH ZONE OF CATCHMENT AREA (EXCLUDING NON STORE RETAIL TRADE DEDUCTION)

ZONE	2019	2020	2021	2022	2023	2024	2025	2026	2027
1 (Buffer)	£3,942	£3,607	£3,841	£3,853	£3,992	£4,107	£4,222	£4,345	£4,471
2a (Buffer)	£4,093	£3,745	£3,989	£4,000	£4,145	£4,265	£4,384	£4,511	£4,642
2b (Buffer)	£4,047	£3,703	£3,944	£3,956	£4,098	£4,217	£4,335	£4,461	£4,590
3a (PSA)	£4,196	£3,839	£4,089	£4,101	£4,249	£4,372	£4,494	£4,625	£4,759
3b (PSA)	£2,980	£2,727	£2,904	£2,913	£3,018	£3,105	£3,192	£3,285	£3,380
ANNUAL GROWTH	-	-8.5%	6.5%	3.8%	3.6%	2.9%	2.8%	2.9%	2.9%

Notes:

- a. Per capita expenditure derived from Experian Location Analyst data report (November 2021 Report)
- b. Per capita expenditure projected forward using forecast growth rates taken from Figure 6, Appendix 3 of Experian Retail Planner Briefing Note 18 (October 2020)
- c. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

2019 Prices

TABLE 10(c): PER CAPITA COMPARISON EXPENDITURE WITHIN EACH ZONE OF CATCHMENT AREA (INCLUDING NON STORE RETAIL TRADE DEDUCTION)

ZONE	2019	2020	2021	2022	2023	2024	2025	2026	2027
1 (Buffer)	£3,252	£2,781	£3,004	£2,986	£3,066	£3,122	£3,184	£3,250	£3,317
2a (Buffer)	£3,377	£2,887	£3,119	£3,100	£3,183	£3,241	£3,306	£3,374	£3,444
2b (Buffer)	£3,339	£2,855	£3,084	£3,066	£3,147	£3,205	£3,268	£3,336	£3,406
3a (PSA)	£3,462	£2,960	£3,198	£3,178	£3,263	£3,323	£3,389	£3,459	£3,531
3b (PSA)	£2,459	£2,102	£2,271	£2,257	£2,317	£2,360	£2,407	£2,457	£2,508
ANNUAL GROWTH	17.5%	22.9%	21.8%	22.5%	23.2%	24.0%	24.6%	25.2%	25.8%

Notes:

- a. Per capita expenditure derived from Experian Location Analyst data report (November 2021 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 18 (October 2020)
- c. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

2019 Prices

TABLE 10(d): TOTAL COMPARISON GOODS EXPENDITURE WITHIN CATCHMENT AREA

ZONE	2019	2020	2021	2022	2023	2024	2025	2026	2027
1 (Buffer)	£94.21	£80.72	£87.31	£86.92	£89.41	£91.25	£93.28	£95.43	£97.63
2a (Buffer)	£45.44	£38.93	£42.11	£41.92	£43.12	£44.01	£44.99	£46.03	£47.08
2b (Buffer)	£111.22	£95.29	£103.07	£102.62	£105.55	£107.72	£110.12	£112.66	£115.25
3a (PSA)	£57.71	£49.45	£53.48	£53.25	£54.77	£55.89	£57.14	£58.46	£59.80
3b (PSA)	£90.69	£77.70	£84.04	£83.67	£86.07	£87.83	£89.79	£91.86	£93.98
TOTAL	£399.27	£342.09	£370.01	£368.38	£378.92	£386.70	£395.30	£404.43	£413.74

Notes:

- a. Total available expenditure calculated by multiplying population from Table 10(a) by expenditure per head (minus NSRT deduction) from Table 10(c)
- b. Primary Catchment Area comprises Zones 3a and 3b. Zones 1, 2a and 2b represent buffer zones

2019 Prices

**PROPOSED ALDI FOODSTORE - HIGH STREET, SKELMERSDALE
RETAIL IMPACT ASSESSMENT**

TABLE 11: COMPARISON GOODS IMPACT ANALYSIS

Scheme Comparison Goods Turnover (£m) (2025)		£2.77	
Catchment Area	Available Expenditure / Growth (£m)	Representative Proportion of Scheme's Turnover (%)	
Study Area Total Comparison Expenditure (£m) (2025)	£395.30	0.70%	
Study Area Total Comparison Exp Growth (£m) (2022- 2025)	£26.92	10.29%	
Primary Catchment Area Total Comparison Expenditure (£m) (2025)	£146.92	1.89%	
Primary Catchment Area Total Comparison Exp Growth (£m) (2022 - 2025)	£10.01	27.69%	
Skelmersdale Impact - Current Market Share	(%)	(£m)	
Skelmersdale Retail Facilities Market Share of Study Area Expenditure	7.10%	£28.07	
Inflow Allowance from Beyond Study Area (@2.5% of Study Area Draw)	2.50%	£0.70	
Total Turnover (Inclusive of Inflow)	-	£28.77	
Trade Diversion from Skelmersdale Facilities to Aldi	50.00%	£1.39	
Consequential Retail Impact (2025)	-	-4.8%	
Skelmersdale Impact - Allowance for Committed Tawd Valley Centre Scheme	(%)	(£m)	
Skelmersdale Retail Facilities Market Share of Study Area Expenditure	10.00%	£39.53	
Inflow Allowance from Beyond Study Area (@2.5% of Study Area Draw)	2.50%	£0.99	
Total Turnover (Inclusive of Inflow)	-	£40.52	
Trade Diversion from Skelmersdale Facilities to Aldi	50.00%	£1.39	
Consequential Retail Impact (2025)	-	-3.4%	
Skelmersdale Impact - Allowance for Committed Tawd Valley Centre Scheme	(%)	(£m)	
Skelmersdale Retail Facilities Market Share of Study Area Expenditure	15.00%	£59.30	
Inflow Allowance from Beyond Study Area (@2.5% of Study Area Draw)	2.50%	£1.48	
Total Turnover (Inclusive of Inflow)	-	£60.78	
Trade Diversion from Skelmersdale Facilities to Aldi	50.00%	£1.39	
Consequential Retail Impact (2025)	-	-2.3%	

Notes

- Turnover of proposal from Table 1 and projected forwards using Experian forecast sales densities from Figures 4a and 4b (Page 14) of Experian Retail Planner Briefing Note 18 (Oct 2020)
- Available expenditure and growth derived from Table 10
- '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 Tawd Valley 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)

2019 Prices

Appendix V

Retail Impact Assessment Methodology

Appendix V

Retail Impact Assessment Methodology

Methodology / Data Input	Approach / Data Source
Population and Expenditure	
Price Base	2019 prices.
Population and Expenditure Base Data Source	Base population and pre-capita expenditure figures derived from Experian Location Analyst report (November 2021).
Population Growth Assumptions	Population growth assumptions taken from Experian Location Analyst report (November 2021).
Convenience and Comparison Goods Expenditure Growth Assumptions	Per capita expenditure projected forward using forecast growth rates taken from Figure 6, Appendix 3 of Experian Retail Planner Briefing Note 18 (October 2020).
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 18 (Oct 2020).
Study Area and Shopping Patterns	
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)).
Floorspace, Sales Densities, and Turnover	
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 of trade counter unit is an AY estimation based on information from Toolstation (the anticipated end user).
Benchmark Convenience and Comparison Goods Sales Densities for Scheme and Commitments	Convenience and comparison goods sales densities for Aldi derived from Mintel 2021 UK Retail Rankings, albeit adapted with updated floorspace and unit numbers supplied by Aldi Stores Ltd.

	Comparison goods sales density for the trade counter unit is reflective of the 'sales per outlet' figure for Toolstation (the end user) from Mintel Retail Rankings 2021.
Changes in Retail Sales Densities	Turnovers projected forwards using Experian forecast sales densities from Figures 4a and 4b (Page 14) of Experian Retail Planner Briefing Note 18 (October 2020) (Latest available at the time of preparation).
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>Floorspace figures for uses at the Tawd Valley Centre are derived from the retail impact assessment prepared in support of application Ref. 2018/0898/FUL (Approved Sept 2019).</p> <p>Convenience goods sales densities for both Lidl and B&M sourced from Mintel 2021 UK Retail Rankings (in 2019 prices).</p>
Retail Impact Assumptions	
Impact Assessment Base Year	2022
Impact Assessment Test Years	2025 (three years from base year – assumes permission in 2022, opening in 2023/24, and trading patterns established by 2025).
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.
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.

Appendix VI

Health Check Assessments

Skelmersdale Town Centre Health Check Assessment

Centre Overview

The shops and services located within central Skelmersdale are defined as the 'Town Centre', according to West Lancashire's Local Plan 2012 - 2027 (October 2013). These are principally located within the Concourse Shopping Centre, a 1960's multi-level shopping mall that was constructed to serve the New Town. However, also within the defined centre boundary are drive-through restaurants (KFC and McDonalds), an Asda superstore, library, leisure centre, youth centre, gym, various office buildings and a local college.

Skelmersdale Town Centre serves the largest urban area within West Lancashire and, together with Ormskirk and Burscough, is identified as a 'first tier town centre' by Policy IF1 of the West Lancashire Local Plan. Based on an Avison Young count in November 2021, the centre currently benefits from some 95 units in total. This includes a considerable number of national multiple retailers (many of which are accommodated in the Concourse Centre) alongside a range of independent operators and a permanent covered market (again within the Concourse).

As a town centre of borough wide significance, Skelmersdale also benefits from a range of important civic, transportation, and educational facilities. For example, the centre is home to West Lancashire College, various civic buildings occupied by West Lancashire Borough Council, a police station, and an important local bus station / transport hub. Accordingly, the centre is evidently more than just a shopping destination and plays a key role within West Lancashire's wider economy.

Regeneration Proposals

Skelmersdale town centre is currently in a period of transition. A significant town centre extension scheme has been constructed and is close to opening (Spring 2022). The first phase of the 'Tawd Valley Centre' will deliver a Lidl foodstore, B&M Homestore and a further non-food retail unit of some 992 sq. m, all served by several hundred new surface level car parking spaces. Further phases of the scheme (which already benefit from outline planning permission) would see delivery of a new 'high street' linking the Concourse Shopping Centre with West Lancashire College's campus. Based on indicative plans, this further phase would provide a range of smaller-scale shops, bars, restaurants and a six-screen cinema.

In addition to the above scheme, the site of the former Glenburn Sports College (south of the town centre) has been identified as the preferred location for a future railway station to serve Skelmersdale. This was confirmed in 2017 through a partnership involving Lancashire County Council (the landowner), West Lancashire Borough Council, and Merseytravel. As recently as September 2021 it is understood that Lancashire County Council submitted a strategic outline business case for the new railway line and station to the Government. This bid document is understood to name the former Glenburn College site as the preferred location for a new railway station and associated public transport hub for Skelmersdale.

Diversity of Uses

As Table I below shows, the town centre's **convenience** retail offer accounts for around 12.6% of all retail units in the centre, which is above the national average of 9.2% and reflective of the fact that the primary role of the centre is to serve the substantial population of Skelmersdale (some 40,000 people). Convenience units in the centre vary in size from an Asda superstore of some 7,900 sq. m gross floorspace to comparatively much smaller Aldi, Farmfoods and Iceland stores located within the Concourse Centre. There are also smaller still independent shops (grocers, confectioners, etc.) aimed at meeting nothing more than the top-up food shopping requirements of visitors. In early 2022 a further foodstore will be introduced in the form of a new Lidl located within the Tawd Valley centre.

In terms of **comparison** goods provision, 30.5% of the centre's retail units are categorised as this use, which is just above the national average position of 27.3%. This sector is a key strength of the town centre and a notable number of national multiples are present on the first floor, including: JJB Sports, Argos, Home Bargains, Boots, Poundland, Wilko, Specsavers, New Look, Superdrug, CEX, Card Factory and Peacocks (amongst others). It should also be noted that a new B&M Homestore will be opening as part of the Tawd Valley Centre in Spring 2022, and this will add a further dimension to the town centre's non-food offer.

Table I: Diversity of Uses in Preston City Centre (surveyed November 2021)

Use Type	Number of Units (November 2021)			Difference Vs National Average
	No.	Skelmersdale Town Centre	UK	
Convenience	12	12.6%	9.2%	3.4%
Comparison	29	30.5%	27.3%	3.4%
Retail Service	12	12.6%	15.7%	-3.1%
Leisure Service	11	11.6%	24.6%	-13.1%
Financial and Business Service	14	14.7%	9.2%	5.6%
Vacant	17	17.9%	14.1%	3.7%
Total	95	100.0%	100.0%	-

Regarding the town centre's **retail service** offering, there are estimated to be 12 retail service operators, which account for 12.6% of all units. The national average for units occupied by retail service use is 15.7% and therefore the position in Skelmersdale is broadly in line with the national position. From our observations the majority of the retail service units identified were *'health and beauty'* outlets (largely hairdressers and salons). Retail services tended to occupy smaller units than other retail unit types in the centre and this is possibly a barrier to further such uses being provided, with the first floor of the Concourse in particular lacking small units.

Skelmersdale town centre has a surprisingly low percentage of units occupied by **leisure services** (11.6%). This is well below the national average for such uses (24.6%). The key reason for this is that traditionally the 'evening economy' (pubs, bars and restaurants) makes up a big part of this sector but in the case of Skelmersdale town centre the evening economy is largely non-existent. This can be attributed to the fact that the vast majority of the town centre's floorspace is within the Concourse and accessed internally. Given that the shopping centre closes in early evening, this inevitably means that there is limited demand for occupation by pubs, bars and restaurants – which trade best during evenings and at night-time.

Finally, the number of **financial and business service** uses in the town centre (14.7%) is above the national average position of 9.1%. These uses took the form of retail banks and a number of office uses within the Concourse, including the Citizens Advice Bureau and a West Lancashire Borough Council's advice centre.

Alongside these categorised uses, there are also a wide variety of other important retail, civic, transportation and educational facilities serving the town. For example:

- There is a permanent indoor market on the ground floor of the Concourse Shopping Centre (opposite Aldi) which accommodates some 15-20 stalls. These stalls have not been included as part of the diversity of use assessment but were largely occupied when we visited;
- The town centre benefits from a leisure centre, library and youth centre immediately adjacent to the Concourse Shopping Centre to the west. Again, these uses do not form part of our 'diversity of use' analysis;
- The town centre is home to the large campus of West Lancashire College, located immediately north-west of the Concourse; and
- The Concourse Shopping Centre is also home to the town centre's bus station – the largest public transport hub in the town.

Accordingly, the centre is evidently more than just a shopping destination and plays a key role within West Lancashire's wider economy.

Vacancy Rate

With regards vacant units, a vacancy rate of 17.9% of all units was identified on our visit to the town centre in November 2021, which is above the national average position of some 14.1%, albeit only by some 3.7%. It should be noted that this figure does not take account of the soon to be trading Tawd Valley Centre, which will largely be occupied at the point of opening.

Of these vacant units, it was noted that none were outside the Concourse shopping centre and indeed only one small vacancy was identified on the ground floor of the Concourse (of some 25 units). In fact, it is worth highlighting that the largest vacant unit on the ground floor was occupied in May 2021 through the opening of the 'Ultra Star Cinema'. This represents an important leisure service investment in the centre.

This therefore means that 16 of the 17 vacant units identified in the town centre were on the first floor of the Concourse – which by our count has a total of 66 units. This relatively high first floor vacancy rate was also identified as part of the Council's 2018 Retail Study, suggesting that it is an ongoing issue in filling these units for the shopping centre. Notwithstanding this, we are aware of new stores opening as well as those closing on the first floor. For example, the three largest units on the floor are occupied by Home Bargains, Wilko and Poundland – with Poundland only opening last year. A new furniture retailer also took one of the larger vacant units on the first floor during the summer of 2021. It must also be noted that the first floor contains a wide range of other multiples, including: JJB Sports, Argos, Boots, Specsavers, New Look, Superdrug, CEX, Card Factory, Peacocks and Iceland.

In our view, the issue with the first floor of the Concourse shopping centre is twofold. Firstly, there is an obvious lack of leisure service uses on this floor (i.e. cafes, bars, restaurants) – uses which would ordinarily form an important part of a centre's offer. The reason for this is inevitably that the mall closes in the early evening, which is a key barrier to leisure operators who need the 'night-time' economy to remain viable. The first floor is therefore simply not attracting such end users – limiting letting options.

The second issue is that the units available on the first floor are not insubstantial in size, with the majority linear in shape and extending to between 150 sq. m and 400 sq. m. Accordingly, these units are unlikely to be

attractive to independents who require only a small floorplate of less than 100 sq. m. They are intended instead for national multiples (of which there are already a wide range on the first floor). This factor again limits letting options on the first floor, with there only being a finite number of national multiples prepared to invest in a town centre of Skelmersdale's order and arguably too many units / space catering only for national multiples.

It therefore seems inevitable that units will remain vacant on the first floor of the Concourse Centre, unless reconfiguration takes place to enable the diversification of some of the available space away from typical floorplates that national serve multiple non-food retailers and towards smaller independent occupiers. It is also considered that measures need to be taken to encourage more leisure service uses on the first floor (perhaps through longer mall operational hours) as these would typically account for some 25% of units in a traditional high-street.

Drawing the above vacancy analysis together, whilst acknowledging that the first floor of the Concourse has suffered from a relatively high vacancy rate for a number of years, this must be set in the context of the fact that Skelmersdale town centre as a whole has an overall vacancy rate (17.9%) which is only 3.7% above the national average position (14.1%). Furthermore, we are of the view that there are contributing factors to the location and type of vacancies identified in the Concourse, this given their size (which is unlikely to appeal to independents) and fact that the first floor is unlikely to be of interest from the significant 'leisure service' sector (given the operational hours of the mall itself – which preclude night-time trading).

The reality in our view is that Skelmersdale town centre (like many such centres) is in a period of transition, there is no longer demand for some of its units given their outmoded formats and it is for landlords to actively investigate alternative uses. There is evidence of this already happening in the Concourse, with the opening of a cinema on the ground floor earlier this year. However, the first floor is likely to require more significant physical intervention in our view to promote long-term diversification.

In conclusion, notwithstanding specific pockets of vacancies within the town centre (for which there are contributing factors), in our view this does not undermine its overall vitality and viability. It remains a healthy, well-used and very popular centre which still accommodates a wide range of national multiple retailers.

Balance Between Independent and Multiple Stores

Skelmersdale town centre accommodates over 30 national multiple retailers. This includes a number of the UK's typical high street operators, such as: JJB Sports, Argos, Boots, Specsavers, New Look, Superdrug, CEX, Card Factory, Peacocks, Home Bargains, Poundland, Wilko, Aldi, KFC, Asda, McDonalds and Iceland (amongst others). Multiple retailers therefore comprise a notable part of the town centre's offering. The centre also has an independent retail offer – with the indoor market an important part of this. However, as outlined in the 'vacancies' section, it is considered that independents may be discouraged by the relatively large size of many of the vacant units on the first floor, with these all 100 sq. m or above.

Accessibility

As an important local town centre, Skelmersdale is well connected regionally and locally by the strategic highways network and public transport connections. For example, Skelmersdale bus station forms an integral part of the Concourse Centre.

Access by private car to the town centre is particularly good. Free of charge parking provision is provided centrally in the form of a 550 space multi-storey car park serving the Concourse. There is also adjacent surface level car parking. Furthermore, the Asda superstore is served by a significant car park and the forthcoming Tawd Valley centre will also benefit from a large surface-level car park once open in Spring 2022.

In terms of pedestrian access, significant areas of the town centre are pedestrianised. For example, the Concourse Shopping Centre and the public square servicing the library, leisure centre and youth centre. This

allows for the free flow of pedestrians around the town centre. In addition, the centre benefits from a network of pedestrian only routes to surrounding residential areas. These have been carefully planned as part of the construction of the New Town.

Environmental Quality

From our observations the internal malls of the Concourse Centre are generally well maintained. However, the interior is dated and in need of investment. Beyond the Concourse the centre's environmental quality is relatively poor, with the public realm dated and in need of replacement. However, this is proposed to take place as part of the future phases of the Tawd Valley scheme, and indeed the initial phase itself (once opened in 2022) will provide a welcome boost to the environmental quality of the centre. Notwithstanding this, it should be recognised that Skelmersdale town centre does benefit from an attractive setting comprising mature landscaping. This is reflective of its location in the Tawd Valley and the planning which took place as part of the creation of the New Town.

Summary / Conclusions

By way of conclusion, Skelmersdale Town Centre serves the largest urban area within West Lancashire and, together with Ormskirk and Burscough, is identified as a 'first tier town centre' by Policy IF1 of the West Lancashire Local Plan. Based on Avison Young fieldwork in November 2021, the centre currently benefits from some 95 units in total. This includes a considerable number of national multiple retailers (many of which are accommodated in the Concourse Centre) alongside a range of independent operators and a permanent covered market (again within the Concourse). The largest unit is a freestanding Asda superstore of some 7,900 sq. m gross floorspace.

However, the centre is evidently more than just a shopping and leisure destination and plays a key role within West Lancashire's wider economy, providing a wide range of important civic, transportation and educational facilities. For example, the town centre is home to West Lancashire College, various civic buildings occupied by West Lancashire Borough Council (amongst others), a police station, and an important local bus station / transport hub.

Skelmersdale town centre is also currently in a period of transition. A significant town centre extension scheme has been constructed and opens in Spring 2022. The first phase of the 'Tawd Valley Centre' will deliver a Lidl foodstore, B&M Homestore and a further non-food retail unit, all served by several hundred new surface level car parking spaces. Further phases of the scheme (which already benefit from outline planning permission) would see delivery of a new 'high street' linking the Concourse Shopping Centre with West Lancashire College's campus. This would provide a range of smaller-scale shops, bars, restaurants and a new six-screen cinema.

With regards diversity of use, the proportion of convenience and comparison goods units in the town centre is above the national average position, at 12.6% and 30.5% respectively. Both of these sectors are an important strength of the town centre and a wide range of national multiples are present, including: JJB Sports, Argos, Boots, Specsavers, New Look, Superdrug, CEX, Card Factory, Peacocks, Home Bargains, Poundland, Wilko, Aldi, KFC, Asda, McDonalds and Iceland (amongst others).

In terms of vacant units, whilst it is acknowledged that the first floor of the Concourse has suffered from a relatively high vacancy rate for a number of years, this must be set in the context of the fact that Skelmersdale town centre as a whole only has an overall vacancy rate (17.9%) which is just 3.7% above the national average position (14.1%). Furthermore, we are of the view that there are contributing factors to the location and type of vacancies identified in the Concourse. This is given their size (which is unlikely to appeal to small independents) and fact that the first floor is unlikely to be of interest for the important 'leisure service' sector (given the operational hours of the mall itself – which preclude night-time trading).

The reality is that Skelmersdale town centre is in a period of transition. There is no longer demand for some of its units given their outmoded formats, which are best suited to multiple food and non-food retailers. It therefore seems inevitable that units will remain vacant on the first floor of the Concourse Centre, unless reconfiguration takes place to enable the diversification of some of the available space away from typical multiple-retailer floorplates and towards smaller independent occupiers and different uses. It is also considered that measures need to be taken to encourage more leisure service uses on the first floor (perhaps through longer mall operational hours). Leisure services would typically account for some 25% of units in a traditional town centre. The fact that this sector is so very much underrepresented in the Concourse is therefore undoubtedly a key factor in the first floor vacancy rate.

The vacancy level in parts of the Concourse must be viewed in this context and, with a major regeneration scheme being progressed in the town centre (the Tawd Valley Centre) and much of its existing floorspace being occupied by multiple retailers, our conclusion is that whilst Skelmersdale clearly has its challenges it can be regarded as a relatively healthy, well-used and popular town centre. In our view, the majority of its key health check indicators point towards it being 'vital and viable' at the present time..

Sandy Lane Local Centre Health Check Assessment

Centre Overview

The shops and services at Sandy Lane are defined as a 'Small Local Centre', according to Policy IF1 of the West Lancashire Local Plan 2012 - 2026 (2013). Sandy Lane is located 1.2km west of Skelmersdale town centre. It can best be described as a purpose built shopping precinct, which was designed and built as part of Skelmersdale's new town designation in the 1960/70's. The pedestrianised precinct contains some 17 retail units at ground floor level, whilst the first floor level (which is not accessible to the public) largely comprises storage space and offices. The local centre is served by two surface level car parks, both of which provide some 70 free-of-charge parking spaces. It is also noted that there are three further traditional terraced shop units immediately north of the local centre which do not form part of the centre designation but evidently do contribute to its overall offer.

Diversity of Uses

As Table I below shows, Sandy Lane's **convenience** sector accounts for 29.4% of all retail units in the centre, which is above the national average of 9.2% and reflective of the fact that the centre is very much geared towards meeting the surrounding walk-in catchment's day-to-day needs (including 'top-up' food shopping). Convenience units take the form of a Co-op convenience store (238 sq. m net), a smaller independent convenience store, a newsagent, a grocer and a baker (amongst others).

In terms of **comparison** goods provision, 11.8% (2no.) of the centre's retail units are categorised as this use, in comparison to the national average of 27.1%. Uses include a florist and an optician. It is unsurprising that comparison goods retailers are particularly limited in the centre given the relatively small size of the units, the centre's role and function, and the more extensive comparison goods offer in Skelmersdale town centre.

Table I: Diversity of Uses in Sandy Lane Local Centre (surveyed on November 2021)

Use Type	Number of Units (November 2021)			Difference Vs National Average
	No.	Sandy Lane Local Centre	UK	
Convenience	5	29.4%	9.2%	20.2%
Comparison	2	11.8%	27.1%	-15.4%
Retail Service	4	23.5%	15.7%	7.8%
Leisure Service	4	23.5%	24.6%	-1.1%
Financial and Business Service	2	11.8%	9.1%	2.7%
Vacant	0	0.0%	14.2%	-14.2%
Total	17	100.0%	100.0%	-

Regarding the centre's **retail service** offering, there are currently 4 retail service operators, which account for 23.5% of all units. The national average for units occupied for retail service use is 15.7%. Such uses include health and beauty uses and a laundrette.

The centre has a proportion of **leisure services** (23.5%) which is comparable with the national average for such uses (24.6%). Uses include a hot food take-away, public house, café and betting office. Finally, the number of **financial and business service** uses (11.8%) is broadly in line with the national average position of 9.1%.

Alongside these categorised uses, there are also a variety of other miscellaneous amenities serving Sandy Lane local centre (which are not accounted for in Table 1), these include two free-of-charge surface level car parks, a medical practice, a park, a Covid-19 walk-through testing centre and various buildings associated with West Lancashire Borough Council.

Vacancy Rate

With regards vacant units, importantly no vacancies were identified on our visit to the centre in November 2021. This compares particularly favourably with the national average position of some 14.1% of units in each centre being vacant. In summary, Sandy Lane has a well below average vacancy rate, and this is a strong indicator that it is a healthy, well-used and popular centre.

Balance Between Independent and Multiple Stores

The centre comprises a total of 17 units, of which six are occupied by multiple retailers / operators (Co-op, Post Office, Rowlands Pharmacy, Betfred, Sayers and Martin's Newsagents). Multiple stores therefore comprise a notable part of the centre's offering, but it also evidently has a strong independent retail / service offer.

Accessibility

The local centre is situated in a densely populated residential area and therefore benefits from a sizable walk-in catchment. In terms of private car travel, the local centre benefits from two free-of-charge car parks located to the north and south off Sandy Lane. From our observations, these car parks are popular and well used, and are of considerable benefit to the overall performance of the centre – attracting those who cannot easily walk to the centre given the distance or mobility constraints.

Finally, several bus stops are located within the vicinity of the local centre, providing regular services to Skelmersdale town centre and surrounding residential areas. Accordingly, the centre benefits from being accessible by this sustainable mode of transport.

Environmental Quality

The environmental quality of Sandy Lane local centre is considered to be mixed. Whilst the shop units within the centre are generally well maintained and it appears clean, the precinct itself now appears tired and in need of investment. A greenspace and 'pocket park' (with children's playground) is located off Witham Road to the east. This is of benefit to the centre's environmental qualities. However, the public realm within the centre itself appears tired and in need of replacement.

Summary / Conclusions

By way of a conclusion, Sandy Lane is evidently a diverse, well-used local centre which provides a good range of services which are suitable to serve the 'day-to-day' smaller-scale needs of the surrounding walk-in catchment area.

The proportion of convenience retail uses, and retail service uses in the centre are higher than the national average positions. This is reflective of the centre's role in meeting 'top-up' food shopping needs and daily demand for services.

Sandy Lane has a mixed environmental quality, with shop units generally well-maintained but the 1960's precinct itself now tired and in need of investment. Meanwhile, access is good via a variety of means (including public transport) and the centre also appears to benefit from a sizable walk-in catchment area from surrounding high-density residential areas. Two free-of-charge car parks (located off Sandy Lane) which serve the centre are well used and are clearly of considerable benefit to its overall performance.

Finally, in terms of vacancies (a key health check indicator), importantly no vacancies were identified on our visit to the centre in November 2021. This compares particularly favourably with the national average position of some 14.1% of units in each centre being vacant. Sandy Lane therefore has a vacancy rate well below average, and this is a strong indicator that it is a healthy, well-used and popular centre.

Drawing the above analysis together, the evidence suggests that Sandy Lane local centre plays an important role in meeting the day-to-day retail and service needs of the surrounding residential population. The centre unquestionably shows strong signs of 'vitality and viability' and can be regarded as healthy at the present time. This is emphasised by the fact that none of the ground floor units in the centre are currently vacant.

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