

DSD/lja/188/19

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D2 PLANNING

TOWN PLANNING * DEVELOPMENT * ENVIRONMENTAL CONSULTANTS

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Dear Sir

Application No. 2019/0366/FUL
Pennylands House, High Street, Skelmersdale, WN8 8LP

We have been instructed by The Skelmersdale Partnership who own and manage the Concourse Shopping Centre, to submit further representations in respect of the above detailed planning application. These representations should be read in conjunction with our correspondence dated 3rd December 2019. This correspondence has been prepared following consideration of the Retail Critique of the application prepared by Lichfields (29th May 2020).

The Lichfield Retail Critique considers important issues namely, retail impact and sequential assessment. We deal with each of these issues in turn: -

Retail Impact

The impact in relation to Skelmersdale Town Centre is set out in paragraphs 2.50-2.62 of the Retail Critique. Paragraphs 2.60-2.61 states: -

“The main impact concern relating to Skelmersdale Town Centre is the implications for existing investment in the Concourse Centre. Aldi’s relocation will reduce the convenience goods turnover attracted to the Concourse Centre from £20.15 million to £12.54 million, allowing for trade redistribution. The reduction from the base year convenience goods turnover (£22.81 million) is -45%. This cumulative -45% reduction in convenience goods trade within the Concourse Centre is likely to lead to a significant reduction in footfall within the Concourse Centre. The closure of the Aldi store will create a large new void in a central position on the ground floor mall. The Skelmersdale Partnership suggests the closure of the store will increase vacant floorspace from 7,159 sq.m to 8,465 sq.m, an 18% increase.

As identified in the WLRLS, the Aldi store is an important anchor within the Concourse Centre. In our view the closure of the Aldi store is likely to have knock on implications for other shops and services within the Concourse Centre which could lead to other shop closures. The loss of the anchor store will also significantly reduce the attraction of the Concourse Centre from the perspective of potential new operators. The current high vacancy rate is likely to increase rather than reduce in the future.”

At present there is 2,586 sqm (27,826 sq ft) of vacant retail floorspace on the ground and first floors. In addition, there is 585 sqm (6,298 sq ft) of retail floorspace in GVA which would also become vacant. There is also 3,715 sqm (35,350 sq ft) vacant on the second floor. If Aldi relocates this will increase the amount of vacant floorspace by 1,300 sqm (14,000 sq ft) and will involve the loss of an important anchor tenant.

As stated, in our original letter, retailing trading conditions are extremely difficult and a number of businesses in the Concourse Centre are at best marginal. Covid-19 has not helped the situation and a further number of tenants may not renew their leases, particularly as it is known that Aldi are looking to vacate the Centre. Furthermore, there are other lease renewals in the next 12-18 months and if these tenants decide to vacate there will be difficulty in letting the units which will ultimately lead to a further decline in the Concourse Centre and thus the Town Centre. In such circumstances, the proposal would significantly adversely affect the vitality and viability of the Town Centre. In such circumstance the objectors would have to consider their ongoing investment in the Centre.

Sequential Assessment

The main issues relating to the Concourse Centre are outlined in paragraph 3.31-3.38. We would advise that no discussions have taken place with the authors of the report on this issue. Our previous correspondence indicated how additional space can be made available to be able to enlarge the existing Aldi store to one which meets their current requirements. The Lichfields report states: -

“The owners of the Concourse Centre (Skelmersdale Partnership) suggest the existing store can be extended into neighbouring units (No. 102 and 104) to provide enlarged premises capable of meeting Aldi needs. A plan has been prepared showing a unit of 1,786 sq.m gross (1,313 sq.m net), with improved access to the car park.

AY’s response letter questions the availability of No. 102 and 104, which are currently occupied by British Heart Foundation and Field Fresh. Skelmersdale Partnership does not indicate how and when vacant possession of these units can be secured. AY suggests the lease on the British Heart Foundation runs until the last quarter of 2022. AY suggest the assembly and construction of this extended unit would take 4 to 5 years (i.e. 2024/25). In our view, the amalgamation these two adjacent units does not appears to be particularly complex in construction terms. If vacant possession can be

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achieved in the last quarter of 2022 then the enlarged store could be opened before the end of 2023.

AY suggests the proposed Aldi store is expected to open in the first half of 2021. This timetable now appears ambitious. The Aldi store is likely to open in late 2021 at the earliest. This implies an extended store in the Concourse Centre would result in a two year delay compared with the likely application timetable. However, construction could commence before 2022, if vacant possession can be negotiated (presumably with compensation) with the current occupiers. There are a large number of vacant units available within the centre where these tenants could be relocated.”

The Skelmersdale Partnership have always made Aldi aware of the potential to enlarge their existing store in the Concourse Centre. Indeed, correspondence was sent to the company’s property director in December 2019, with a plan showing how an enlarged Aldi store could be accommodated. However, Aldi have never responded formally, no doubt due to their current proposals. The Skelmersdale Partnership would not have suggested this potential opportunity if it was not deliverable in a reasonable period of time.

With regards the Field Fresh unit, their lease has expired and they are ‘holding over’. The Skelmersdale Partnership intend to serve notice on the tenant to vacate the unit to enable redevelopment to take place. Accordingly, the unit could be available within 6 months. Turning to the British Heart Foundation, a new lease is about to be agreed. However, this provides for a break to be served after 6 months by either party. Accordingly, this unit would be available in 7/8 months times. In view of the above, both units are available within a reasonable period of time and can be incorporated into Aldi’s existing store to provide an enlarged format as shown on the plan previously submitted. In view of this information, Aldi have not met the sequential assessment test as required by the NPPF.

Finally, we continue to believe that the application should be refused by reason of: -

- i. The development has not complied with the sequential assessment as there are adequately preferable sites available elsewhere, namely in the Concourse Centre;
- ii. The proposals, if allowed, would threaten the ongoing investment that is taking place in the Concourse Centre, contrary to Policy SP2 and the NPPF; and
- iii. The proposals would adversely impact on the vitality and viability of the Concourse Centre and the Town Centre.

We trust that these comments will be taken into consideration in the determination of this application.

Yours faithfully,


D2 Planning Limited

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