

Our ref: MSM/07B509221



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**BY E-MAIL**

Dear Stephen

## Higher Trehiddle Farm, St Austell

### Assessment of Retail Planning Policy Issues

#### Introduction

Further to our letter of 14<sup>th</sup> April 2015 (attached), we have reviewed the additional information submitted by Mango Planning & Development Ltd ('Mango') on behalf the applicants (Westcountry Land (St Austell) Ltd and Kingsley Land Developments Ltd) ('the applicants'), for the mixed use development on land at Higher Trehiddle Farm in St Austell. In addition, we have also reviewed the following representations from, or on behalf of, Ellandi, who are the owners of the White River Place shopping centre in St Austell town centre:

- o A document entitled 'Interim Observations on the Higher Trehiddle Farm Planning Application', prepared by Savills and dated 24<sup>th</sup> March 2015;
- o A letter from Ellandi to the Council dated 29<sup>th</sup> April 2015; and
- o A letter from Ellandi to GVA dated 27<sup>th</sup> May 2015 (and attached).

As you know, the description of the proposed development is as follows:

*"Mixed use development comprising food and non food retail development, hotel and restaurant, residential development, public open space with associated road infrastructure, access, parking and other utilities and services."*

As the description of development does not make reference to any use classes or floorspace, then reference must be made to other parts of the submitted application form which notes that, in addition to the residential uses, the following floorspace is proposed: 10,133sq m of Class A1 floorspace, 656sq m of Class A3 floorspace and 5,158sq m of Class C1 floorspace.

Within the Retail Assessment ('RA') prepared by Mango and submitted in support of this application, two controls were offered by the applicant. These were a minimum retail unit size of 465sq m and a *"no poaching clause within a binding legal agreement to ensure that the development does not draw retailers represented in the town centre"*. In the RA, no controls

were offered in relation to the goods sold from the development, net or gross floorspace areas or the number of retail units.

Our letter of 14<sup>th</sup> April raises a number of queries regarding the scope of the retail floorspace and the controls proposed by the applicant. These included:

- o Further details of the proposed 'no poaching' obligation offered by the applicant (including its geographic extent and length of time);
- o A request for confirmation regarding the minimum unit size restriction;
- o Confirmation of whether there will be any restrictions regarding the ranges of convenience and comparison goods to be sold from the proposed Class A1 retail floorspace;
- o Whether the applicant is content for any convenience goods floorspace provided within the scheme to be restricted to a discount foodstore only; and
- o Given that, in relation to the sequential test, the applicants are seeking to argue that the Higher Trehwiddle Farm proposal is different to sequentially preferable sites such as Old Vicarage Place (in St Austell town centre), we indicated that it would be very helpful if the applicants could name the retailers that they are targeting for the proposed retail floorspace.

Within the letter dated 23<sup>rd</sup> April from Mango, the following information is provided:

- o Little additional information has been provided in relation to the 'no poaching' clause. Page 1 of the Mango letter notes that, in relation to the proposed obligation, *"this would permit the sale of comparison goods from the non food units at the site, provided the occupier is not already represented in St Austell town centre"*. Apart from the notable reference to comparison goods, we would strongly recommend that the Council places no weight on the 'no poaching' restriction offered by the applicants. An opportunity has been given to the applicants to fully explain the extent of the proposed obligation and they have chosen not to do so. In addition, the reference to comparison goods only in the Mango letter is notable as no similar reference is made to convenience goods. Therefore, it must be assumed that the applicants do not want their 'no poaching' clause to cover convenience goods retailers (i.e. food stores) and it is notable that the leasing plan attached to the recent letter from Ellandi shows Iceland, who are an existing town centre convenience goods retailer. We note that Lidl are also a town centre convenience goods retailer who would fit into the discount foodstore scenario at Higher Trehwiddle Farm suggested by the applicants' RA.
- o The applicant has confirmed that the proposed minimum unit size restriction relates to all floorspace in a single unit. Therefore, a unit which conforms to the 465sq m minimum size does not have to have all of this floorspace at ground floor level (i.e. it could be 465sq m at ground and mezzanine floors).
- o The applicant is not proposing any restrictions on the range of comparison goods to be sold from the development. In addition, the letter does not make any reference to any restrictions on the type of convenience goods to be sold from the development. Also, there is no proposed restriction/control over how the retail floorspace is delivered.
- o The applicants have also declined to restrict any convenience goods floorspace within the development to a discount operator, such as ALDI or Lidl. As a consequence, no weight can, in our opinion, be placed on the applicant's analysis which is based upon a discount operator occupying floorspace at the application site. This scenario nevertheless remains a possibility under the terms of the permission sought by the applicants and regard should be had to the references to ALDI and Lidl in my previous advice letter, and

also the potential for either operator to relocate their store to the High Trehiddle Farm site<sup>1</sup>.

- o The applicant has offered further controls, in addition to the minimum unit size control. These are a maximum retail unit size of 2,500sq m gross, a maximum total gross retail floorspace of 10,133sq m and a restriction on the sub-division of units. Whilst the implications of these conditions are outlined below, it should be noted that no controls have been offered in relation to the net sales floorspace in the proposed development, nor any control over the number of retail units. In addition, whilst a control over sub-division has been offered and needs to be taken into account, this will only take effect when the retail floorspace has been constructed, as there is no control over the exact size and format of units (save for minimum and maximum levels) at this stage.

Therefore, in light of the supplementary information provided by the applicants, the development, as sought by the applicants, allows for the following scenarios:

- o Retail unit numbers. A wide range of possibilities are available to the applicant, ranging from a minimum of 4 large (2,500sq m) units to a maximum of 21 smaller (465sq m) units.
- o Balance between convenience and comparison goods floorspace. Despite the approach taken in the applicants' RA, there is no restriction on the balance between convenience and comparison goods floorspace/sales in the proposed Class A1 retail floorspace. For example, there is no certainty that a foodstore would be delivered alongside non-food retail units. Instead, all of the floorspace could be comparison goods sales.
- o Range of retail goods to be sold. The proposed development would be permitted to sell an unrestricted range of retail goods. Therefore, the following product categories could be sold from the development: food and drink, clothes and shoes, household goods, furniture, carpets, textiles and home furnishings, CDs, DVDs, books and stationery, DIY goods, electrical goods, health and beauty products, toys, games and recreational goods.
- o Convenience goods retail floorspace. If convenience goods floorspace is to be provided in the proposed development, then it may not be limited to a discount foodstore operator as claimed by the applicants' RA. Instead, an alternative format/operator could be accommodated either in a stand-alone unit or as part of a mixed goods store.

In light of the above possibilities, we do not agree with the suggestions made by the applicants' RA that the proposed development at Higher Trehiddle Farm will be complementary to St Austell town centre and the proposed Old Vicarage Place redevelopment project. Instead, it is our view that the proposed development will offer direct competition for St Austell town centre and surrounding centres such as Truro because:

- o It has the potential to sell the same ranges of products as existing and future retail units in the town centre;
- o It can provide a format of retail unit which the same or similar to retail units in the town centre, and thus accommodate town centre retailers; and
- o Has the ability to change over time without recourse to further planning permissions.

It is within this context that we have gone on to give further consideration to the salient national planning policy tests of impact and the sequential approach to site selection.

### Sequential Test

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<sup>1</sup> The ALDI store lies on the edge of Mount Charles district centre and Lidl lies in St Austell town centre

As set out in our previous letter, there is, given the location and planning policy status of the application site, a formal requirement to consider whether the proposed development complies with the sequential test. In light of the out of centre location of the application site, there is a need to consider whether there are any suitable, viable and available in-centre or edge-of-centre sites, or more accessible and better connected out-of-centre sites than the application site. In addition, as previously set out, there is also a need for both the applicant and the Council to be flexible in their approach to scale and format when assessing alternative sites.

Within this policy context, our previous advice letter raised the following queries and observations:

- o It was unclear how the applicant has reached the conclusion that the Old Vicarage Place ('OVP') redevelopment scheme would provide different units to the application site.
- o We did not consider that the potential for the OVP scheme to accommodate a covered shopping mall renders it incapable of attracting and accommodating the types of retailer which would also be attracted to the application site. Nor did we consider that the provision of retail units which have sales areas over two levels renders the OVP development materially different to the Higher Trehiddle Farm proposal.
- o There is no evidence provided by the applicants to show that the OVP redevelopment will have a strong A3 café/restaurant focus.
- o In relation to the existing occupiers of the OVP site, the applicants' have not provided any information to demonstrate that the area subject to the proposed redevelopment will not become available within a reasonable period of time.

In light of the above factors, we did not consider that it has been demonstrated that the OVP area can be dismissed from the sequential test.

Within letter from Mango dated 23<sup>rd</sup> April, it is suggested that, based upon a press article, one of the owners of the site (M&M) intends to refurbish the existing retail units rather than promote them for redevelopment. It is then suggested that these existing units provide a format and range of retail which is entirely different to the application site. No other information regarding the sequential test and OVP is provided by the 23<sup>rd</sup> April Mango letter.

Since the 23<sup>rd</sup> April letter from Mango, the Council has received a letter (dated 29<sup>th</sup> April) from Ellandi, the owners of the White River Place shopping centre. That letter confirms that all interested parties are still pursuing the OVP redevelopment scheme and discussions are also well advanced for Ellandi to acquire the other land ownership interests across the site. As a consequence, this letter from Ellandi indicates that the press article referred to by Mango may not be correct. This has been reiterated by the 27<sup>th</sup> May letter from Ellandi (attached), which has also confirmed that the Higher Trehiddle Farm and OVP developments would be competing for the same or substantially similar tenants.

As a consequence, we are minded to place no weight on the press article referred to in the Mango letter and instead place significant weight on the information submitted by Ellandi in relation to the proposals for OVP. In particular, there is no reason to doubt the claim that a redevelopment project is being pursued and that serious efforts are being made by Ellandi in this regard. We have also spoken with M&M and they have confirmed that there continuing active discussions over the redevelopment scheme and there is no suggestion that retention and refurbishment of the existing units is the intended outcome.

In relation to the suitability of the OVP redevelopment project, the 23<sup>rd</sup> April letter from Mango does not provide any further information and we therefore must continue to base our assessment on the applicants' RA. The RA suggests that the new retail units at OVP will be smaller than those provided at the application site. Based upon the information provided within the Savills 'Initial Observations' document, this does not appear to be correct as both schemes can deliver units between the scale of 465sqm to 2,500sqm promoted at the application site.

Overall, we continue to hold the view that the applicants for the High Trehiddle Farm scheme have not demonstrated that it complies with the sequential test. In particular, there is clear

evidence of the OVP site being promoted for redevelopment, including one of the major land owners requiring further property in this area. In addition, there is an active pre-application enquiry which shows how modern retail units of a similar size to those promoted at the application site can be accommodated.

Therefore, given that there are very few proposed controls over the Class A1 retail floorspace at Higher Trehiddle Farm it is clear that there is every possibility that it can replicate the potential retail floorspace in the OVP redevelopment. Given that OVP lies in a clearly sequentially preferable location, we consider that the Council should conclude that the Higher Trehiddle Farm application fails the sequential test, as set out in paragraph 24 of the NPPF and Policy 4 of the draft Cornwall Local Plan Strategies Policies document.

## Impact

As set out in our previous letter there is, due to the scale, location and policy status of the application site, a need to consider the proposed development against the impact tests in paragraph 26 of the NPPF. These tests relate to the need to consider the impact of the proposed development on town centre investment and also the impact on town centre vitality and viability.

Having reviewed the applicants' impact assessment in the RA, our previous advice letter raised the following concerns:

- o Potential errors in the population data used in the financial impact assessment;
- o Use of expenditure forecasts which do not match the basis for the financial impact analysis;
- o Uncertainty over the source of the market share data in the assessment;
- o Potentially incorrect study area turnover levels for convenience and comparison goods floorspace;
- o An under-estimated turnover level for the proposed convenience goods floorspace;
- o Failure to take into account the necessary level of commitments; and
- o Only a partial assessment of the trade diversion to the proposed retail floorspace.

The letter from Mango dated 23<sup>rd</sup> April provides only a very brief response to these queries/concerns and does not, in our opinion, adequately address the inconsistencies with the population and other data used in the applicant's assessment. Therefore, as referenced in our letter of 14<sup>th</sup> April 2015, we have undertaken our own assessment of impact. Within our analysis, we have adopted the following:

- o We have used the store/centre turnover levels for, both convenience and comparison goods shopping facilities, from the Cornwall Retail Study Update 2015;
- o Used the total turnover of the proposed retail sales floorspace at Higher Trehiddle Farm<sup>2</sup>; and
- o Including the impact of the supermarket at Pentewan Road as a commitment within the cumulative impact assessment.

However, most importantly, it should be noted from the outset that, due to the very flexible form of permission sought by the applicants, the proposed development could impact upon defined centres in St Austell and the surrounding area in different ways. For example:

- o there is no certainty over the range of comparison goods retailers who could occupy the proposed retail floorspace;
- o there is no certainty over the type or identity of food store retailer who could occupy the proposed floorspace, or even if a food store retailer will actually be accommodated in the development; and
- o as a consequence of the uncertainty over the provision of convenience goods floorspace within the scheme, and the applicant not proposing controls over the balance of retail

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<sup>2</sup> Even though there is a concern that it may be an under-estimate

floorspace, there is a possibility that the amount of comparison goods floorspace could be higher than is shown in the applicant's impact assessment<sup>3</sup>.

This uncertainty is, in itself, a cause for concern for the future health of the town centre and a factor that we recommend the Council should put weight upon.

As a guide, however, we attach an impact assessment which adopts the level of comparison goods floorspace used by the applicants<sup>4</sup> and also their sales density assumption for that space. However, as previously noted, the applicant's sales density is only an average and could be an under-estimate depending on the identity of comparison and mixed goods retailers occupying the proposed floorspace. The attached assessment also makes the assumption, in line with the applicants' assumption, that part of the floorspace will be occupied by a discount foodstore. We have used the trading characteristics of ALDI as a guide as occupation by ALDI is a possibility and they also have the higher trading performance of the two main discount retailers<sup>5</sup>.

In our opinion, based upon the generally unrestricted nature of the proposed retail floorspace, this scenario would lead to an impact of around 12% on St Austell town centre's comparison goods sector. This would rise to 13% when the impact of commitments (i.e. the Pentewan Road supermarket) is taken into account. Based upon part of the proposed retail floorspace being occupied by an ALDI discount foodstore, then we predict that the Lidl store in the town centre is likely to suffer a trade diversion of around £0.9m. This would lead to a 15% impact upon the convenience goods sector in St Austell town centre.

When making this estimate of trade diversion, we have taken into account the possibility that an ALDI store on the application could be a relocation of the existing ALDI store from Mount Charles. In such circumstances, not only would the new store have a large impact upon the town centre's convenience goods sector, within which the Lidl store forms the largest store, but also there could be a large impact upon Mount Charles district centre if there is evidence to show that the existing ALDI store benefits the adjacent district centre via linked trips and spin off trade. The applicant's assessment does not deal with this eventuality and therefore we would recommend that this aspect is given further consideration, as it could be a further detrimental impact of the proposed development. Similarly, if the relocation was Lidl, then the impact upon the health of the town centre could be even greater.

Overall, the scenario which we have assessed could lead to a loss of 12% of retail turnover in St Austell town centre. When combined with commitments, this impact would rise to a 13% reduction in trade. In our opinion, this is a significant loss of trade for St Austell town centre, spread across the convenience and comparison goods sectors. It is, in our opinion, a particularly concerning level of trade loss for the comparison goods sector given that this sector underpins the performance of the town centre.

However, it should also be noted that this is not the only scenario which could occur at the application site. For example, as noted earlier in this letter, there is no guarantee that convenience goods floorspace will be delivered within the scheme, in a discount foodstore or otherwise. Therefore, without restrictions, the proposed development could provide a greater amount of unrestricted comparison goods sales and this would, in our opinion, increase the adverse impact upon the comparison goods sector in St Austell town centre. Furthermore, these levels of financial impact do not take into account the impacts associated with the recently opened B&M store and the soon to be opened The Range store. Both stores are very large and sell a wide range of products. It is very likely in our opinion that the financial impact figures outlined above would be therefore be under-estimates when the B&M and Range stores are taken into account (as both of these stores are selling products which compete directly with St Austell town centre).

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<sup>3</sup> 6,689sq m net

<sup>4</sup> 6,689sq m net

<sup>5</sup> The other being Lidl at £3,900/sq m net.

Therefore, in our opinion, even on the basis of the retail floorspace (and comparison sales density) figures put forward by the applicant, the proposed development is likely to have a significant adverse financial impact upon St Austell town centre. However, there is a possibility that this significant adverse financial impact will be higher due to the unrestricted nature of the proposal. It should also be noted that the scale of impact on Mount Charles district centre could also be severe, depending upon the future intentions of ALDI and their representation in St Austell.

However, beyond the large financial impact of the Higher Trehiddle Farm development, there are a number of other wider town centre impact considerations for the Council. First, there is the scale of competition from broadly unrestricted floorspace at the application. Whilst minimum and maximum unit size controls are proposed, there are no controls over the range of food and non-food goods to be sold. As a consequence, there is a very real potential for the Higher Trehiddle Farm development to provide a retail offer (i.e. range of goods) which competes directly with St Austell town centre. Of particular concern is the competition posed by retailers selling non-bulky comparison goods which are generally to be found in town centre environments and are particularly common in the primary shopping area around White River Place and Fore Street. This is a key concern expressed in the representations received from Ellandi, the owners of White River Place.

Second, whilst a particular characteristic of the Higher Trehiddle Farm proposal will be to clawback some retail expenditure which is being lost to shopping trips to Truro, the Council should give consideration to the potential for this to benefit the town centre via linked trips. In our opinion, this appears unlikely to given the distance from the application site to the town centre and therefore the ability of the proposal to act as a stand-alone shopping destination.

Third, at the present time, there remains the potential for the Higher Trehiddle Farm proposal to attract existing occupiers away from the St Austell town centre. Whilst a 'no poaching' clause has been offered, the applicants have failed to provide detailed information on this issue and it would appear that only comparison goods retailers are covered<sup>6</sup>. Given the lack of detail from the applicants, we reiterate our view that no weight should be placed on the proposed 'no poaching' clause at the present time. In any event, where 'no poaching' clauses have been adopted in other towns, it is our view that these clauses only usually offer short term mitigation and do not protect the medium to longer potential for investment in town centres or to sustain and enhance their vitality and viability.

Finally, in addition to existing retailers, there is also the potential for the proposed development at Higher Trehiddle Farm to attract retailers who would have otherwise located in the town centre (in either the proposed OVP redevelopment or existing vacant units). This issue is not normally covered by 'no poaching' clauses elsewhere in Cornwall and would represent a particular threat to the potential for investment in St Austell town centre. It will be noted that that this is a particular concern for Ellandi.

Overall, based upon the above analysis, it is our view that the Higher Trehiddle Farm proposals is likely to have a significant impact on planned and existing investment in St Austell, due to the scale and unrestricted nature of the proposed floorspace. We also consider that it is likely to have a significant adverse impact upon the vitality and viability of St Austell town centre, for the reasons outlined above. This would place the scheme in conflict with paragraph 26 of the NPPF and would warrant a refusal under paragraph 27 of the same document.

## Conclusions

In light of the foregoing analysis, and bearing mind the form of retail floorspace sought by the applicants, we have reached the view that the Higher Trehiddle Farm application fails the sequential test and is likely to have a significant adverse impact upon both planned investment in St Austell town centre and also the vitality and viability of the centre. In particular, there is a suitable site (Old Vicarage Place) in a sequentially preferable location within St Austell town

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<sup>6</sup> Therefore, there is a possibility that town centre foodstores such as Iceland and Lidl could relocate.

centre which has the potential to become available within a reasonable period of time. Moreover, it is likely in our opinion that the Higher Trehiddle Farm development would have a significant adverse impact on the delivery of the Old Vicarage Place investment and, due to the range of goods sold from the application site and the form of retail units which could be provided, the proposed development would have a significant impact upon town centre health.

It is therefore our recommendation that the Higher Trehiddle Farm application conflicts with paragraphs 24 and 26 of the NPPF and, on the basis of paragraph 27, should the Council agree with this conclusion, then they should refuse planning permission.

Finally, there are also three large retail development proposals in the Truro/Threemilestone area. Even though this is some disagreement between us and applicants (at Higher Trehiddle Farm) over the pattern of trade diversion to this proposal, it is common ground that a large amount of expenditure will be transferred from stores in Truro city centre. Therefore, we would strongly advise officers and members of the SPC to take into account the growing cumulative impact on Truro city centre (alongside the significant adverse impact of this scheme on St Austell town centre) when reaching a decision on these applications.

I trust that the contents of this letter are clear and I would be grateful if you could pass this on to the applicants for their response. However, if you have any queries, then please do not hesitate to contact me.

Yours sincerely



**M S Morris BSc(Hons) DipTP MRTPI**  
**Director – Planning, Development & Regeneration**  
**For and on behalf of GVA Grimley Ltd**

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Our ref: MSM/07B509221

14<sup>th</sup> April 2015

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**BY E-MAIL**

Dear Stephen

## Higher Trehiddle Farm, St Austell

### Assessment of Retail Planning Policy Issues

#### Introduction

Further to your recent instructions, we have now completed our initial review of the retail planning policy issues associated with the above planning application, submitted by Westcountry Land (St Austell) Ltd and Kingsley Land Developments Ltd ('the applicants'), for a mixed use development on land at Higher Trehiddle Farm in St Austell.

The content of the application in relation to retail and other main town centre uses includes Class A1 and A3 retail floorspace, plus Class C1 hotel floorspace. A more detailed description of the proposed retail and other main town centre uses is contained in the next section of this letter.

Having regard to your instructions, this proposal has been considered in the context of the development plan for the area and other material planning policy and guidance documents such as the National Planning Policy Framework ('the NPPF') and the National Planning Practice Guidance ('NPPG'). A summary of the salient parts of these policy documents is contained later in this letter.

For the purposes of this advice, we have carried out a review of the relevant documentation which has been submitted in support of this application. For the purposes of this advice letter, we have concentrated our review on a Retail Assessment ('RA') prepared by Mango Planning & Development Ltd ('Mango'), dated December 2014.

In addition, throughout this advice letter, we also make reference to the contents of the Cornwall Retail Study Update 2015, prepared by GVA for Cornwall Council ('the 2015 Retail Study Update') and also the Cornwall Retail Study 2010 ('the 2010 Retail Study').

## Proposed Development

As set out on the submitted application form, the proposed development is as follows:

*"Mixed use development comprising food and non-food retail development, hotel and restaurant, residential development, public open space with associated road infrastructure, access, parking and other utilities and services".*

The application form also indicates the following quantum for the retail and other main town centre uses:

- o Class A1 retail floorspace: 10,133sq m gross
- o Class A3 retail floorspace: 656sq m gross
- o Class C1 hotel: 5,158sq m gross

Section 3 of the RA indicates that the 10,133sq m of Class A1 floorspace comprises the following elements:

- o A 'discount foodstore' of 1,722sq m gross; and
- o 'non-food' retail floorspace of 8,361sq m gross.

We provide extracts from the submitted 'framework masterplan' and 'illustrative masterplan' below.

**Figure A: extract from submitted 'framework masterplan'**



Figure B: extract from submitted 'illustrative masterplan'



Within the above 'illustrative masterplan', the retail and main town centre uses are organised in the following manner:

- Block 2: hotel
- Block 3: pub/restaurant
- Block 4: food retail
- Block 5: non-food retail

Paragraph 3.6 of the RA suggests that:

*"the non-food units are intended to be complementary to those offered in St Austell town centre and proposed in the Vicarage Place development. To ensure the complementarity of the development, the applicant proposes two restrictions on the retail uses, as follows:*

- *A minimum unit size of 465sq m*
- *A 'no poaching' clause within a binding legal agreement to ensure that the development does not draw retailers represented in the town centre".*

In our opinion, the level of detail provided in the RA regarding the 'no poaching' clause is insufficient and further information is required from the applicants, including:

- Whether the 'no poaching clause' relates to all retailers which could occupy the proposed development?
- Whether it relates to retailers in the town centre boundary, as defined by the adopted Local Plan or some other definition?
- The terms of the 'no poaching' clause, including the length of time that it will be apply for and the obligations placed upon retailers with premises in the town centre.

This information is required in order for us to complete our assessment of the salient retail planning policy issues.

The RA is not clear whether the minimum unit size restriction offered by the applicant relates to a total unit size (i.e. ground and, potentially, first floor/mezzanine floor areas) or a ground floor area only. Further information is required on this point.

In addition, whilst the applicant's financial impact seeks to test the effects of 1,200sq m (net) of convenience goods floorspace within the 'discount foodstore' and 6,689sq m (net) of comparison goods floorspace within the 'non-food' floorspace, the text of the RA does not offer any restrictions in relation to the range of goods which will be sold from the proposed Class A1 retail floorspace. Moreover, it is not clear whether any of the 6,689sq m (net) of comparison goods floorspace is proposed to be assigned to the 'discount foodstore'. This needs to be clarified, including:

- o How much comparison goods floorspace will be associated with the proposed 'discount foodstore';
- o Whether the applicant is content for all of the 'non-food' floorspace to be controlled to comparison goods only and also whether any restrictions are being offered in relation to the range of comparison goods to be sold; and
- o Whether the applicant is content for the convenience goods floorspace to be restricted to a discount foodstore only.

Finally, whilst the permission sought runs with the land, the RA does not name any specific retailers (or types of retailer) for either the 'discount foodstore' or the 'non-food' floorspace. In relation to the 'discount foodstore', it should be noted that whilst Netto have announced that they are to return to the UK market, the main two discount foodstore operators in the UK are ALDI and Lidl. As set out in the RA, both operators already have a presence in St Austell, with ALDI (760sq m net) adjacent to Mount Charles district centre and the Lidl store (650sq m net) within St Austell town centre boundary<sup>1</sup>. Therefore, in light of these existing stores, we consider that there is a reasonable likelihood that the 'discount foodstore' element of the proposed development could attract a relocation of either operator.

In relation to the other retail floorspace, there are no named retailers. Given that, in relation to the sequential test, the applicants are seeking to differentiate the proposed development from sequentially preferable sites such as Old Vicarage Place, it would be very helpful if the applicants could name the retailers that they are targeting for the proposed retail floorspace.

### Planning Policy Context

The development plan for the application site comprises the saved policies in the adopted Restormel Borough Council Local Plan (adopted in 2001). The Council are in the course of preparing a new Local Plan, the Cornwall Local Plan, a draft of which has recently been submitted for Examination. We understand that an Examination will take place later this year. The contents of the draft Local Plan have the potential to be a material consideration for this application, although the weight to be attached to relevant elements of the draft Plan will be dependent upon the extent and nature of unresolved objections. Given the age of the adopted Local Plan, a further important material consideration for this application will therefore be the contents of the NPPF.

Within the **adopted Local Plan**, the majority of the application site lies outside of the defined development envelope in St Austell. The location of the proposed retail and other main town centre uses are separated from the defined town centre and prime shopping area definitions in the adopted Local Plan and, given the distance between the two locations, we agree with the applicant that the application site can be described as an out of centre location.

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<sup>1</sup> As defined by the adopted Local Plan.

Policy 58 of the adopted Local Plan remains saved and deals with shopping proposals outside of town centres. Part 1 of this policy is directed at retail development within the defined development envelopes of Newquay and St Austell and therefore, given the location of the proposed retail floorspace at Higher Trehiddle Farm, this part of Policy 58 may not be directly applicable. Nevertheless, part 1 of Policy 58 notes that retail development outside of town centres will be permitted where a number of criteria are met. These criteria relate to: the need for development, the sequential approach, land safeguarded for other uses and highway/accessibility issues.

Part 2 of Policy 58 deals with development outside of the development envelopes of Newquay and St Austell and indicates that shopping development will only be permitted if they would clearly meet local needs and be located within the development envelope of a town or village. In our view, Policy 58 is partly inconsistent with the NPPF and we would agree with paragraph 4.8 of the RA that the policy should be afforded only limited weight.

Chapter 16 of the adopted Local Plan deals with employment and regeneration issues in St Austell, with saved policies SA12/13/14 relating to shopping, mixed use and town centre redevelopment opportunities. Policy SA12 deals with small scale shopping development opportunities at Priory car park, North Street and Vicarage Place. SA13 allocates land between Beech Road, East Hill and High Cross Street for mixed use development and Policy SA14 allocates land at Church Street and Aylmer Square for redevelopment. The Aylmer Square allocation has now been redeveloped into the White River Place shopping centre.

As noted above, the **NPPF** will be a particularly important material consideration for this application. Section 2 of the NPPF is relevant to this proposal, with paragraph 24 noting that:

*"Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale".*

This policy continues with the similar general thrust of national policy established by PPS6 and PPS4, with the promotion of the 'town centres first' approach and preferring sites in defined town centres and then edge of centre locations before out of centre sites should be considered. In addition, the NPPF continues to require flexibility to be incorporated into the assessment of alternative sites.

The NPPF also retains an 'impact' test for retail, leisure and office development outside of town centres which are not in accordance with an up-to-date Local Plan. The NPPF states that local planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold or, if there is no locally set threshold the default threshold is 2,500sq m.

The NPPF notes that impact assessments should include an assessment of:

- o 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
- o the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

Importantly, the NPPF retains the clear guidance to local planning authorities:

“Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused”.

The **Cornwall Local Plan Strategic Policies** document has recently been submitted to the Secretary of State for Examination. Policy 4 of the March 2014 Proposed Submission document (incorporating focused changes, September 2014) deals with retail and other main town centre land uses, noting that such uses outside of defined town centres must show that there is no significant adverse impact on the viability and vitality of the existing centre and demonstrate the application of the sequential approach to site selection.

Policy PP9 of the Local Plan Strategic Policies document relates to the St Austell area and notes that development will be permitted where it can be demonstrated that a number of priorities can be satisfied. In relation to St Austell and retail uses, these priorities are:

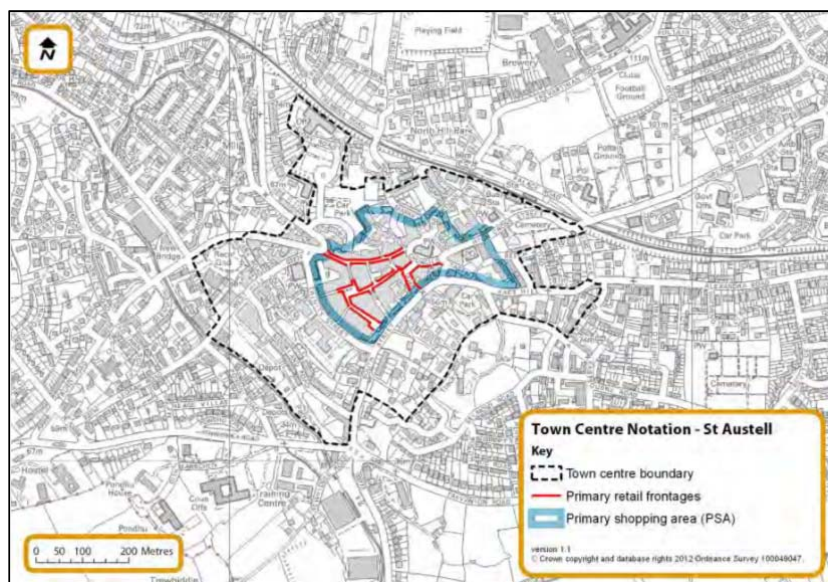
*“1. St Austell*

*a. the protection of the vitality and viability of St Austell town centre through the promotion of retail, office and leisure uses. Proposals for change of use or redevelopment will only be permitted within the Primary Shopping Area if the proposal adds to the attractiveness of the centre and does not reduce the predominance of A1 retail use;*

*d. support the regeneration of St Austell town centre, and the local economy to create a better balance between housing and employment”.*

The Strategic Policies document also proposes the following town centre, primary retail frontage and primary shopping area boundaries for St Austell:

**Figure C: proposed boundaries for St Austell town centre**



Between April and May 2014, the Council undertook a consultation on the St Austell and Surrounding Parishes Town Framework (**‘the April 2014 Town Framework’**). The 2014 Town Framework covered a wide variety of issues, including a retail strategy. The consultation sought views on alternative retail strategies of either concentrating all retail development on in-centre and edge-of-centre sites only or allowing development in the town centre and also out-of-centre/out-of-town sites. It also highlighted potential locations for retail development including:

the town centre, the Sedgemoor offices and an area south of Penwinnick Road (lying between the existing Council offices and the retail warehouses on Pentewan Road). The area of the current application site identified for retail and other main town centre uses was not included.

As a result of the feedback to the Town Framework consultation, the Council decided to undertake a further focused consultation on the retail strategy and site options in St Austell ('the **St Austell Retail Strategy**'). It is understood that the results of the retail strategy consultation will inform the Cornwall Site Allocations Development Plan Document. Within the retail strategy consultation, further views were sought on the retail strategy for the town and also the greater number of potential development sites. In particular, further views were again sought on the alternative strategies of either concentrating all retail development on in-centre and edge-of-centre sites only or allowing development in the town centre and also out-of-centre/out-of-town sites. The wider range of retail development sites included the area around the application site (known as 'Trehiddle Area West'). The other sites covered the consultation included: Old Vicarage Place, Sedgemoor, the Co-op store and surrounding land on West Hill, Trehiddle Area East and Coyte Farm.

### Sequential Test

Given the location and planning policy status of the application site, there is a formal requirement to consider whether the proposed development complies with the sequential test. In light of the out of centre location of the application site, there is a need to consider whether there are any suitable, viable and available in-centre or edge-of-centre sites, or more accessible and better connected out-of-centre sites than the application site. There is also a need for both the applicant and the Council to be flexible in their approach to scale and format when assessing alternative sites.

In relation to flexibility, paragraph 6.5 of the RA acknowledges that the applicant must demonstrate compliance on this issue in relation to layout, range of uses, amount of floorspace and car parking. The same paragraph goes on to note that:

*"it is important to recognise that significant reductions to the range and quantum of development proposed at the application site will change the intended function of the development away from the need that it is intended to serve. Therefore, rather than set a minimum site size threshold, each alternative location has to be assessed in relation to its own characteristics and its ability to accommodate a range of facilities which can meet a similar need to the application proposal".*

Paragraph 6.6 of the RA goes on to note that:

*"In this instance, when considering what constitutes a 'suitable' site, the need that the proposal is intending to serve and the nature of the scheme proposed is fundamental to the determination of whether a site is suitable".*

Whilst we would agree with the applicant that there is likely to be a finite extent to the flexibility which can be employed in any given development scheme, there is very little information supplied by the applicant on the ways in which flexibility can be achieved in this proposal in terms of scale and format. The applicant indicates that flexibility is linked to the need that the development intends to serve, but this 'need' or 'function' is not explained anywhere in the RA. To one extent, the lack of information on the need that the development intends to serve is unsurprising as this is a speculative proposal without any linked retailers and a general lack of controls over the proposed retail floorspace. As a consequence, we consider that there is considerable flexibility in the scheme as the development scenarios for the proposed floorspace are numerous, with different levels of floorspace in different configurations of units numbers and sizes.

Whilst it is unconnected to the need that the development intends to serve, paragraph 6.9 of the RA indicates that there are *"practical and unique circumstances"* associated with this application. In particular, it is noted that these 'circumstances' relate to the funding that the

retail and leisure components will provide to “*pump prime*” the provision of infrastructure elsewhere in the development required to deliver the remainder of the site for residential uses. This suggests a ‘location specific’ argument and, whilst we are not instructed to advise on viability issues, we would raise the following questions:

- o has evidence been submitted to the Council to prove that the infrastructure associated with the residential development cannot be funded by that (residential) use?
- o If so, does that evidence demonstrate that the scale of the current retail and leisure proposal is necessary to fund that infrastructure?
- o Are there alternatives available to fund the necessary infrastructure (if ‘pump priming’ is demonstrated as necessary)?

If it can be demonstrated that the scale and format of retail and leisure development currently proposed is the only way of funding necessary infrastructure then a ‘location specific’ argument may be accepted by the Council. Otherwise, we consider that the standard approach to the sequential test, as set out by the NPPF and NPPG, should be applied by the Council in this instance.

In terms of the alternative sites which have been assessed in the applicants’ RA, the focus is on the Old Vicarage Place (‘OVP’) area. We would agree with this approach and set out below our views on the assessment provided by the applicant.

Paragraphs 6.20 to 6.29 of the RA set out the applicant’s review of the suitability and availability of the OVP area, which can be summarised as follows:

- o Whilst the OVP area is suitable for retail development, *“it is intended to provide a format and range of retail which is entirely different to the application site”*.
- o The submitted pre-application details, as well as recent press articles, all indicate that development at OVP will be in the format of a covered mall with multi level units and a strong focus on A3 uses.
- o The retail units at OVP will be of a smaller size than those at the application site and designed to attract different operators than those typically seeking town centre premises.
- o Part of the OVP site is occupied and existing retailers would either need to be relocated or their leases renegotiated. In addition, the OVP site is not considered to be available to the applicants in any event.
- o The redevelopment of OVP proposes retail on two levels, with trading floors at lower ground level. A lack of street frontage and inability to provide visual prominence and dedicated car parking is not able to meet the commercial requirements of a commercial supermarket or convenience goods retailer.
- o The other retail units are also split across two trading floors and are unsuited to modern retailer requirements.

Having reviewed the applicants’ analysis, we have the following observations:

- o It is unclear how the applicant has reached the conclusion that the OVP redevelopment scheme would provide different units to the application site. In our view, the OVP scheme can provide the same size and format of retail units as the Higher Trehiddle Farm proposal, with both schemes able to provide several separate units to accommodate several separate retailers.
- o We do not consider that the potential for the OVP scheme to accommodate a covered shopping mall renders it incapable of attracting and accommodating the types of retailer which would also be attracted to the application site.
- o We do not consider that the provision of retail units which have sales areas over two levels renders the OVP development materially different to the Higher Trehiddle Farm proposal. In particular, there is no reason why two-level retail units won’t be provided at the application site and, in any event, asking retailers and developers to be flexible and accommodate multi-level stores is a sign of genuine flexibility.

- o There is no evidence provided by the applicants to show that the OVP redevelopment will have a strong A3 café/restaurant focus.
- o In relation to the existing occupiers of the OVP site, the applicants' have not provided any information to demonstrate that the area subject to the proposed redevelopment will not become available within a reasonable period of time.
- o Whilst it would appear that the applicants' comments in relation to the lack of street frontage and dedicated car parking only relate to convenience goods stores or supermarkets, we do not agree that the redevelopment of OVP would lack the necessary amount of street frontage for stores selling convenience goods.

In light of the above, and having regard to the controls on the proposed development proposed by the applicants, we do not consider that it has been demonstrated that the OVP area can be dismissed from the sequential test. In particular, we consider that the applicant has failed to provide sufficient evidence to demonstrate that the OVP area is not available, not suitable and not viable to accommodate the proposed retail uses (taking into account flexibility). Therefore, at the present time, the proposed development is likely to fail the sequential test as set out in the NPPF.

### Impact

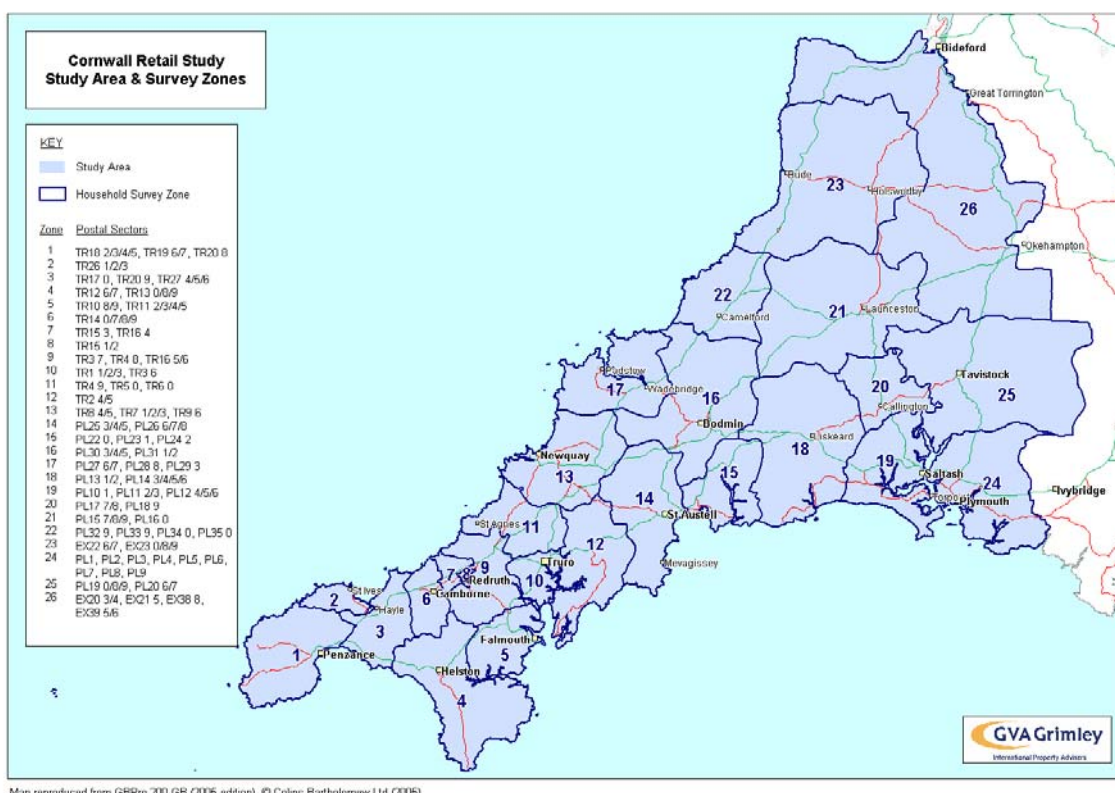
Given the scale of the proposed retail and other main town centre uses, along with their location outside of St Austell town centre, there is also a need to consider their impact on town centre investment and town centre vitality and viability, as set out by paragraph 26 of the NPPF. Clearly, the focus for this assessment should be on St Austell town centre, being the closest defined town centre in the retail hierarchy to the proposed development.

The applicants' RA provides an impact assessment which deals with both of these national policy tests and we have used our initial review to examine the applicants' quantitative assessment of existing shopping patterns and its cumulative assessment of trade diversion.

We raise the following issues:

- o Study area. The applicant's assessment has adopted some key parts of the 2015 Retail Study Update, including the household survey (see below) and the study area. The focus for the applicants' assessment is on zones 14 and 15. Zone 14 covers the St Austell urban area and the rural areas to the north, west and south. Zone 15 covers the area to the east of St Austell. Based upon the market share and turnover data from the 2015 Retail Study Update, we agree with the applicant that zones 14 and 15 will be the primary catchment for the proposal. However, as will be noted later in this letter, further expenditure, from outside of zones 14 and 15, does flow to stores in St Austell and this should be taken into account within the financial impact assessment.

*Figure C: study area from 2015 Retail Study Update*



- o Population. Tables 1a and 1b in RA provide resident population estimates for zones 14 and 15. The population of zone 14 is estimated to be 25,310 at 2014, whilst zone 15 is estimated to be 45,596 at the same year. These population figures are significantly different to the data used in the 2015 Retail Study Update, which adopts figures of 54,075 for zone 14 and 17,555 for zone 15. Therefore, the data used in the applicant's assessment would appear to be incorrect and, given that most of the applicant's financial impact assessment relies upon this population data, there is likely to be consequences for other parts of the assessment.
- o Per capita expenditure data. Given that the applicants adopt an approach which excludes internet shopping from its quantitative assessment, whereas the 2015 Retail Study Update includes this type of shopping, we do not expect the per capita expenditure data in both assessments to match. However, bearing in mind this difference, the per capita expenditure levels in both assessments appear to be similar and thus acceptable. In terms of projections for this per capita expenditure into the future, the applicant adopts the forecasts in figures 1a and 1b of Experian's Retail Planner Briefing Note 12.1. If the convenience and comparison forecasts in these figures have been adopted then these relate to 'total expenditure change', including internet spending and physical stores, which is inconsistent with the decision of the applicant to exclude internet spending from its base expenditure data. Therefore, the forecasts which have been adopted have the potential to be inaccurate.
- o Market shares. The RA indicates that market share data from the household survey of shopping patterns, commissioned by Cornwall Council in 2014, has been adopted. In principle, we welcome this approach although it is unclear which version of the 2014 household survey results have been used by the applicant. Confirmation of the dataset adopted by the applicant is therefore required.

- o Turnover levels of existing convenience stores in the local area. Leaving aside our query over the market share data adopted by the applicant, we have examined the turnover levels of existing convenience and comparison goods stores in the local area. Given that the applicant is using incorrect population data, this is likely to filter through into the turnover estimates. We have undertaken a test based upon the main and top-up food market shares of the Iceland and Tesco stores in St Austell (from Table 2 of the RA) and, based on a 70%/30% main food/top-up food expenditure split, the incorrect population data leads to incorrect turnover levels from these zones. We have assumed that the errors for these two stores are replicated in other parts of the assessment.
- o Turnover of existing comparison goods stores in the local area. Due to the potential errors in the population, this could also have affected the applicants' study area turnover analysis for comparison goods stores in St Austell and the surrounding area. For example, the applicants' analysis suggests a study area turnover of St Austell town centre of £116.8m at 2014 from zones 14 and 15 only, whereas as the 2015 Retail Study update suggests a turnover from the whole of the study area of £99.9m (with a wider study area derived turnover for all stores in St Austell of £110.1m).
- o Commitments. We would agree with the applicant that there is a need to take into account the Morrisons supermarket commitment at Pentewan Road, we consider that the convenience and comparison goods turnovers for that store adopted by the applicant are under-estimates. The applicant predicts a convenience goods turnover of £24.1m and a comparison goods turnover of £6.0m. The 2015 Retail Study Update predicts turnovers of £27.4m and £6.6m respectively. In addition, we consider that the applicant should take account of the recent opening of the B&M store in the former Homebase unit on Southbourne Road. There is also the need to take into account the commitment for a non-food unit on Penwinnick Road and also the forthcoming opening of The Range store in the former Buyology unit at Stadium Retail Park.
- o Turnover of proposed convenience goods floorspace. Table 6 of the RA estimates the sales density of the proposed convenience goods floorspace to be £3,500/sq m. On the assumption that the 'discount foodstore' will be occupied by a discount foodstore operator then we consider the applicants' data to be an under-estimate given that: Mintel estimate ALDI's sales density to be £8,261/sq m and Lidl's density to be £3,960/sq m. The higher of the two estimates should be used to ensure a robust assessment.
- o Turnover of proposed comparison goods floorspace. The applicants' RA adopts an average sales density of £4,500/sq m for all of the proposed comparison goods floorspace. Given that this is a speculative application, including the applicants' decision not to name any of the retailers that it is targeting, assumptions have to be made in the RA. However, it should be noted that the sales densities of comparison goods stores can vary, with some retailers below the £4,500/sq m density adopted by the applicant and some above. Those above include mixed goods retailers such as Poundland and Home Bargains, and clothes retailers such as Next and JD Sports. Therefore, whilst the average density of £4,500/sq m may be appropriate for some scenarios, it may not be appropriate in all circumstances as it will depend upon the format of the retail floorspace as it is developed.
- o Turnover from the study area. Table 6 of the RA predicts that 85% of the turnover of the proposed convenience goods floorspace and 80% of the turnover of the comparison goods floorspace will come from residents of zones 14 and 15 of the study area. Having reviewed the contents of the 2015 Retail Study Update, we consider that these proportions are reasonable. However, whilst there will be an element of expenditure drawn from outside of zones 14 and 15, that does not mean that it should be excluded from the financial impact assessment as the proposed retail floorspace. Unfortunately, that would

appear to be the case in Tables 8 and 9 of the applicants' assessment, where only the study area derived turnover is accounted for in the applicants' trade diversion analysis.

- o Trade diversion to the proposed convenience goods floorspace. Tables 8 and 10a of the RA provide the applicants' estimate of trade diversion to the proposed convenience goods floorspace. Unfortunately, it is difficult for the reader to understand precisely the pattern of trade diversion which has been predicted as Table 8 does not provide a separate clear column which deals with trade diversion and the Table 10a appears to amalgamate the diversion from the Morrisons commitment together with the current proposal.
- o Trade diversion to the proposed comparison goods floorspace. In contrast, Table 9 does provide a separate trade diversion column for the proposed comparison goods floorspace. This makes this aspect of the applicants' analysis clearer. However, only the study area derive turnover of the proposed floorspace is included in Table 9, making the applicants' analysis incomplete.

In light of the above analysis, we have a number of concerns over the robustness of the applicants' financial impact analysis. These are:

- o Potential errors in the population data used in the financial impact assessment;
- o Use of expenditure forecasts which do not match the basis for the financial impact analysis;
- o Uncertainty over the source of the market share data in the assessment;
- o Potentially incorrect study area turnover levels for convenience and comparison goods floorspace;
- o An under-estimated turnover level for the proposed convenience goods floorspace;
- o Failure to take into account the necessary level of commitments; and
- o Only a partial assessment of the trade diversion to the proposed retail floorspace.

This leads us to conclude that the applicants' assessment provides the Council with inadequate information with which to assess the impact of the proposed retail floorspace. As a consequence, we have started to prepare our own impact analysis which draws upon the applicants' assessment and the contents of the 2015 Retail Study Update. However, in order to complete this assessment, confirmation from the applicants regarding a number of matters is required, particularly the range of controls that are proposed for the Class A1 retail floorspace.

## Conclusions

Given the scale of the proposed retail uses in the Higher Trehwiddle Farm proposal and the location of the application site outside of St Austell town centre, there is a need to consider the salient parts of the proposed development against the national policy tests of impact and the sequential approach. We have undertaken an initial review of the applicants' Retail Assessment and have reached the following conclusions:

- o In relation to the sequential test, the focus for our assessment has been on an area of land at Old Vicarage Place ('OVP') in St Austell town centre which is currently subject to a pre-application enquiry for retail-led redevelopment. Having regard to the controls on the Higher Trehwiddle Farm development proposed by the applicants, we do not consider that it has been demonstrated that the OVP area can be dismissed from the sequential test. In particular, we consider that the applicant has failed to provide evidence to demonstrate that the OVP area is not available, not suitable and not viable to accommodate the proposed retail uses (taking into account flexibility).
- o With regards to the applicants' assessment of financial impact, we consider that this has a number of short-comings and we are currently preparing our own impact assessment

to address these concerns. However, in order to complete this assessment of impact, we require the applicant to confirm a number of matters, not least specific matters surrounding the controls which are proposed for the Class A1 retail floorspace.

I trust that the contents of this letter are clear and I would be grateful if you could pass this on to the applicants for their response. However, if you have any queries, then please do not hesitate to contact me.

Yours sincerely

A handwritten signature in grey ink, appearing to read 'M S Morris'.

**M S Morris BSc(Hons) DipTP MRTPI**  
**Director – Planning, Development & Regeneration**  
**For and on behalf of GVA Grimley Ltd**

TABLE A: TOTAL RETAIL IMPACT OF HIGHER TREWHIDDLE FARM PROPOSAL, 2019

	2019 PRE-IMPACT STUDY AREA DERIVED TURNOVER	TOTAL 2019 PRE-IMPACT TURNOVER	DIVERSION TO OTHER COMMITMENTS	RESIDUAL TURNOVER AFTER COMMITMENTS	IMPACT OF COMMITMENTS	DIVERSION TO HTF	RESIDUAL TURNOVER	IMPACT SOLUS      CUMULATIVE	
ST AUSTELL									
Convenience	£6.3	£6.7	£0.6	£6.1	-9.0%	£0.9	£5.2	-14.6%	-22.3%
Comparison	£123.7	£133.6	£1.4	£132.2	-1.0%	£15.4	£116.8	-11.6%	-12.6%
Total	£130.0	£140.3	£2.0	£138.3	-1.4%	£16.3	£122.0	-11.8%	-13.0%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in St Austell on St Austell town centre.

Diversion from St Austell centre to proposal is a GVA assessment based upon the scale and trading style of proposed floorspace plus the market share and trading offer of competing facilities.

Floorspace and comparison goods sales density figures in Mango RA adopted, along with ALDI convenience goods sales density.

Matthew Morris  
GVA  
St. Catherine's Court  
Berkeley Place  
Bristol  
BS8 1BQ

27<sup>th</sup> May 2015

Dear Matthew,

Re: St. Austell – HTF Proposal

Thanks for your call earlier, I am delighted to confirm the following:

- The press article regarding the Old Vicarage Place scheme being shelved is not correct. As set out in my letter to Stephen Kirby on 29th April, following our acquisition of 51-57 Aylmer Place we are continuing our land assembly discussions to facilitate the redevelopment of Old Vicarage Place over the medium term. This can be confirmed by Iain Minto of M & M Asset Management.
- We have also recently undertaken a full building survey of the Poundland block owned by CBRE Gi as the next step in assembling that interest which will facilitate the delivery of a substantial new frontage to Fore Street and new retail units to Aylmer Square in place of the current Poundland servicing area. I would direct you to the representations by our planning consultant, Savills which accompanied my letter to Stephen Kirby for further details of our intended investment for OVP.
- The HTF proposals are already having an effect on town centre retail demand. Despite the promise of “no poaching” our discussions with prospective tenants Peacocks have now floundered, this is a direct result of the proposals at HTF, as evidenced by their proposed leasing plan (attached). You will note that they also include existing town centre retailers such as Iceland.


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- The HTF proposal is intended to compete with the town centre. The focus of HTF and OVP is open A1 retail to accommodate a range of occupiers through providing flexible floorplates. The floorplates of both schemes would deliver similar unit sizes capable of attracting and accommodating a food convenience and / or high street fashion retail anchor, along with a range of other retailers requiring medium to larger floorplates on single or split levels. Such an overlap of unit types will mean that, if approved, OVP will be competing directly for the same or substantially similar tenants. Where potential town centre occupiers are redirected to HTF this will critically undermine our ability to deliver OVP.
- I would also like to draw your attention to the result of the St Austell Retail Consultation of last year (summary attached). This reflects the only professional survey of public opinion which clearly shows the backing for a strong town centre first policy.
- Finally, with the Range and B & M having recently opened within the catchment, I would ask you to ensure that any impact assessment from the Applicant, or indeed your analysis takes into account the huge amount of additional floor space selling general merchandise that competes with the town centre.

If you have any further queries, please do not hesitate to contact me.

Yours sincerely,

  
Mark Robinson

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## **ANALYSIS OF THE ST AUSTELL RETAIL CONSULTATION – 10/11/14 to 19/12/14.**

**Carried out by Cornwall Council both on-line and by independent door to door survey.**

### **Results:-**

519 (39%) forms completed on-line.

804 (61%) households surveyed door to door.

### **On-line:-**

- Supported Strategy 2 (town centre and out-of-centre retail provision).
- Preferred Coyte Farm as the out-of-centre retail development site.
- Most disliked site was Higher Trehiddle Farm.
- Site preferences showed strong support and strong objection to both Old Vicarage Place and Coyte Farm. On both approximately 60% voted for and 40% voted against each site.

### **Door to door survey:-**

- Less than 3% undertake their food shopping outside St Austell.
- 95% undertake their top-up food shopping in St Austell.
- 30% clothes shop in St Austell compared with 44% in Truro.
- 80% do their DIY shopping in St Austell.
- 60% shop for Furniture and floor coverings in St Austell, around 10% in Truro.
- 60% shop for Domestic Appliances in St Austell, 13% in Truro and 16% on-line.
- 46% shop for TV, HiFi and computers in St Austell, 22% in Truro and 21% on-line.
- 57% shop for Books, Jewellery, Glass, Cosmetics, and Medical goods in St Austell.
- 37% shop for Games, toys and sports goods in St Austell, 14% in Truro and 23% on-line.

### **Visiting the town centre and requirements from the town centre.**

- 45% visit the town centre at least once a week and nearly 75% at least once a month.
- 49% wanted better quality shops in the town centre.

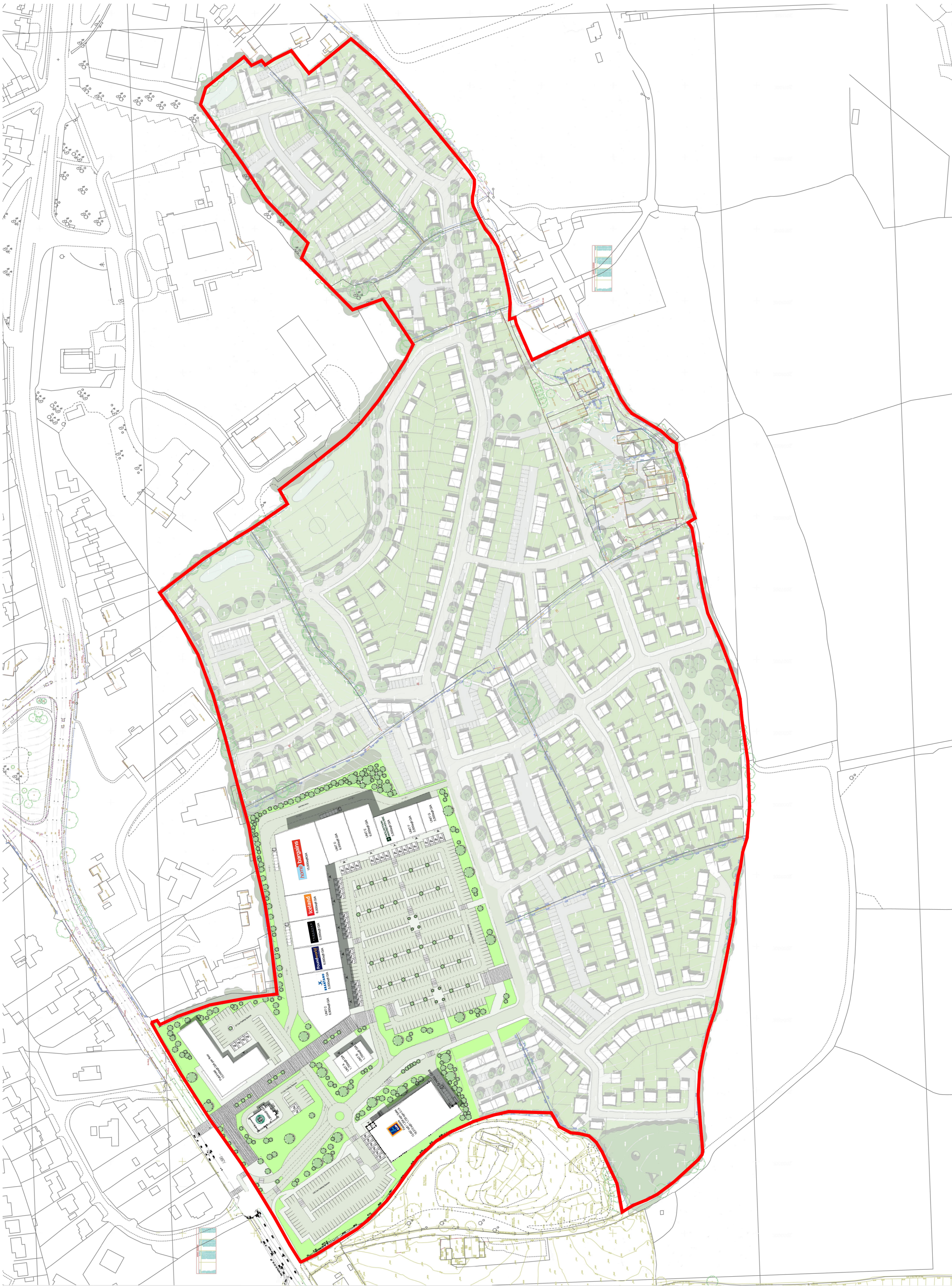
### **Development proposals.**

- 48% wanted retail development in the town centre only (unless no sites available). 44% wanted town centre and out of town.
- 65% supported the NPPF by confirming they only want out of town retail development if the harm on the town centre was nil or, at worst, not significant.
- 48% wanted any out of centre retail development to be as close to the town centre as possible.
- Less than 10% wanted the Higher Trehiddle Farm site brought forward.

## CONCLUSIONS:-

1. On-line there remains strong support for Coyte Farm and OVP.
2. On-line there remains strong opposition for Coyte Farm and OVP.
3. On-line and door to door surveys show little support for retail development at Higher Trehiddle Farm.
4. St Austell makes good provision for food shopping and most other commodities reflecting its retail hierarchy.
5. St Austell needs to address a poor provision for clothes shopping.
6. St Austell has a clear need for additional hi tech and toy/games retail provision (TV, Hi Fi, computers, Toys, Games etc).
7. **Vast majority supported the aims of national planning policy by putting the town centre first for retailing, and only allowing out-of-centre retail development if the town centre cannot provide such sites and the harm to the town centre is nil or, at worst, not significant.**

February 2015.



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PROJECT  
Trewiddle Farm,  
St Austell

TITLE
Sketch Masterplan

## DRAWING STATUS

### Sketch

DRAWN	SA	CHECKED	DB
SCALE	1:1250 @ A1		
DATE	Nov 2014		

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JOB NO.	DRAWING NO.	REV
TBC	SK-01	