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By email

26 July 2023

Dear Sarah

Planning Application Reference 2023/62/91405/W: Proposed Foodstore, St Luke's Hospital Site, Crosland Moor

Town Centre Planning Policy Advice on Behalf of Kirklees Council

I write in relation to the above planning application and further to our instruction from Kirklees Council (hereafter referred to as 'the Council') to appraise the Crosland Moor foodstore proposal against relevant town centre planning policy considerations.

As discussed earlier today, we have identified three matters which are of consequence to the applicant's assessment of the impact arising from the proposal. In our view, a revised assessment which takes into consideration the matters set out below is required to appropriately quantify trade diversion impact.

Identification of the Turnover of Individual Stores in Defined Centres

Lichfields' submitted assessment fails to identify the turnover of individual stores within smaller centres. This is a particular issue in respect of Crosland Moor local centre which is in proximity to the application site and which accommodates a Co-op convenience store. The Co-op provides an important local role in meeting grocery shopping needs and potential trade diversion from this store needs to be appropriately considered.

It would greatly assist if the impact assessment is amended to specifically identify the turnover of the Co-op at Park Road in order that we consider its trading performance and the likely impact arising from the proposal.

Inflow Allowance

We note that the trading position of existing foodstores has been inflated through use of 'inflow' allowances to account for trade which is drawn from beyond the household survey area. The household survey area is extensive (equating to Zones 1, 2, 3, 5, 6 and 7 of the Kirklees Retail Capacity Study) and we believe that the amount of custom which derives from outside the area will be limited. Lichfields assumes 10% inflow for some destinations and 5% for others.

Instead, we believe that a 5% inflow allowance may be appropriate for larger stores and for stores which benefit from

being close to Huddersfield town centre. We do not believe that stores located within Milnsbridge district centre, Blackmoorfoot Road local centre or Crosland Moor local centre are likely to benefit from any notable level of inflow given that such destinations are located centrally within the household survey area.

In our view, the inflow allowances applied by Lichfields are too high and act to overstate the estimated trading performance of existing stores.

We also do not agree that 5% of the turnover of the St Luke's foodstore would likely originate from outside the household survey area given the central position of the application site within that area.

Failure to Account for Additional Proposals

Planning application reference 2023/70/90075/W provides for the variation of restrictive conditions relating to existing retail accommodation at Leeds Road Retail Park (to the north of Huddersfield town centre) to allow occupation by a foodstore operator. The application has been submitted on the basis of likely occupation by Lidl but we understand that there is not yet a contractual arrangement which provides for this.

In order to fully understand Lichfields' case in respect of impacts arising within and around Huddersfield town centre, we request that this proposal is accounted for in the Crosland Moor retail impact assessment. Given the fact that Lidl is not confirmed as end operator, we recommend that the proposed floorspace is considered on the basis of a generic sales density for discount operators (i.e. the mid-point between Aldi and Lidl's company average sales density¹) which reflects the scale of the proposed operation.

Summary

We believe that the above matters are of relevance to the consideration of the retail impacts arising from the proposed Crosland Moor foodstore. I have already spoken with Daniel Gregg at Lichfields to provide an outline of the above matters but would be grateful if you could forward this letter on to the agent.

I would be happy to speak to Lichfields at further length should this assist in progressing the application, but trust that the above is helpful in the meantime.

Yours sincerely

Richard Shepherd
Director

¹ We recommend that this is calculated with reference to Globaldata Convenience and Comparison Goods Sales Densities of Major Grocers 2022 Estimate data.