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Assessment of Retail Planning Policy: Retail Development Proposals, Truro & Threemilestone

Cornwall Council

February 2015

CONTENTS

1.	Introduction.....	4
2.	Summary of the Proposed Developments	8
3.	Basis for the Updated Impact Assessment.....	16
4.	Updated Impact Assessment for the Willow Green Farm, Maiden Green Farm and Hendra Proposals	19
5.	West Langarth: the Retail Planning Policy Issues	28
6.	The Football Club Proposal: the Retail Planning Policy Issues.....	42
7.	Cumulative Impact	55
8.	Summary and Conclusions.....	60

Appendices

Appendix A:	GVA Willow Green Farm advice letter 4 th February 2014
Appendix B:	GVA Maiden Green Farm advice letter 2 nd May 2014
Appendix C:	GVA Hendra advice letter 4 th June 2014
Appendix D:	GVA advice letter on cumulative impact 6 th June 2014
Appendix E:	GVA Advice letter 11 th August 2014
Appendix F:	GVA advice letter 11 th September 2014
Appendix G:	Updated impact assessment
Appendix H:	Study area plan for 2014 household shopping survey
Appendix I:	Plan showing location of current application sites, existing and committed supermarkets and Truro city centre
Appendix J:	Comparison between the requirements of the A390 Development Brief and the main town centre use elements of the Willow Green Farm, Maiden Green Farm, Hendra and West Langarth proposals

1. Introduction

Scope and Purpose

1.1 This report has been prepared by GVA for Cornwall Council ('CC') in relation to retail planning policy issues associated with several planning applications in the Truro and Threemilestone area. The applications covered by this report are as follows:

- **Willow Green Farm ('WGF').** Outline planning application with some matters reserved for proposed mixed use development comprising 435 dwellings, nursing home, school, food store, petrol station, community hall, public house and public open spaces. (hereafter referred to as 'the WGF application').
- **Maiden Green Farm ('MGF').** Hybrid planning application comprising: in outline up to 650 dwellings (including extra care), school, employment space, convenience shop, community pavilion, infrastructure works, landscaping and public open spaces; district centre including supermarket, petrol station, retail units, community hall, restaurant/cafe uses, hotel, creche, medical centre, mobile library parking, parking and servicing; and, in detail, access from the A390 (hereafter referred to as 'the MGF application').
- **Land between the A390, the park and ride and Willow Green Farm (to be referred to as 'the Hendra site').** Outline application for proposed Class A1 retail store of 6,708sq m, petrol station and kiosk, car park, community hub of 1,930 sqm (comprising A1 coffee shop, A3 restaurant and A3/A4 Pub Restaurant, B1 offices including starter units, D2 community meeting room with associated parish council office, D1 creche and associated facilities), pedestrian and cycle links, access works, landscaping and associated works
- **West Langarth ('WL').** Outline mixed use proposal for retail (Use Class A1) with associated petrol filling station and car parking (providing space for mobile library), food and drink (Use Classes A3, A4 and A5) / day nursery (Use Class D1) and residential (Use Class C3) alongside the provision of a community and sports facility (Use Classes D1 and D2), public open space.
- **Truro City Football Club.** Outline planning permission for the redevelopment of Truro City Football Club, Treyew Road, Truro, comprising; the demolition of the existing

Truro City Football Club premises and facilities; the erection of non-food comparison floorspace (Use Class A1), Use Classes A3, A4, A5 floorspace, Use Class D2 floorspace, and vehicular and pedestrian access, landscaping, and associated works. (hereafter known as 'the Football Club site' and 'the Football Club application')

- 1.2 GVA has already provided advice to CC in relation to the WGF, MGF and Hendra applications and our advice letters can be found at appendices A to F at the rear of this report. These letters have covered the relationship of each proposal against the sequential and retail impact tests, along with issues surrounding the cumulative impact of approving more than one of these three applications.
- 1.3 Since the completion of our previous advice, more up-to-date information on shopping patterns has become available which enables us to update our assessment of the financial impact of the WGF, MGF and Hendra proposals. The information on shopping patterns, gathered in October 2014, was commissioned to support a forthcoming update to the 2010 Cornwall Retail Study ('the 2010 Study'), hereafter referred to as 'the Retail Study Update'. The Retail Study Update has also utilised updated information on population and retail expenditure and further information on this issue can be found in Section 3 of this report.
- 1.4 Since the completion of our previous advice on the WGF, MGF and Hendra proposals, the WL and Football Club applications have now been registered as valid applications and both of these applications also require assessment in relation to their relationship with the sequential and retail impact tests. In line with our previous advice on WGF, MGF and Hendra, the WL and Football Club proposals have been considered in the context of the development plan for the area and other material planning policy considerations such as the National Planning Policy Framework ('the NPPF'), which was published in March 2012. The documentation which has been reviewed in relation to each application is set out later in the relevant sections of this advice report.
- 1.5 It should also be noted from the outset of this advice that each of the above applicants has been given the opportunity to update their assessments with the benefit of this new information. At the time of completing this advice report, the promoters of the WGF, MGF and Hendra proposals have not submitted any additional information on retail impact issues. The information submitted in support of the Football Club

application has however taken into account the new survey information and we are also expecting an updated assessment from the promoters of the WL (although at the time of finalising this report the information has not been received).

- 1.6 For the avoidance of doubt, this advice report does not update or supersede our advice to CC in relation to the relationship of the MGF, Hendra and WGF proposals to policy in relation to the sequential test.
- 1.7 It should also be noted that since the completion of our previous advice reports, the promoters of the WGF and Hendra have submitted appeals against the failure of CC to determine their applications. In addition, duplicate applications for these sites have been submitted. In light of their duplicate nature, the contents of this latest advice report apply to both the appeal and duplication Hendra and WGF applications.
- 1.8 The consideration of retail planning policy issues will form one of a number of different considerations for CC when determining these applications. Therefore, CC will be required to balance the advice provided within this report (and appendices) with a number of different material considerations when reaching a final conclusion on each application.

Contents of Report

- 1.9 The remainder of this report is structured in the following manner:
- Section 2 provides a summary of the contents of the West Langarth and Football Club applications, along with a recap of the retail and main centre land use elements of the WGF, MGF and Hendra proposals.
 - In Section 3 we provide the basis for the updated financial impact assessment, including the data inputs and assumptions which have been adopted.
 - Section 4 provides an updated assessment of the retail impact of the WGF, MGF and Hendra proposals on Truro city centre.
 - Sections 5 and 6 provide a review of the salient retail planning policy issues, including sequential site assessment and impact issues, facing the West Langarth and Football Club application proposals.
 - Section 7 provides an assessment of the cumulative impact of approving a combination of the current applications covered by this advice report.

- A summary of the key issues and our conclusions are set out in Section 8 including the relationship of the proposed development to the development plan for the area and other material considerations (including the NPPF).

1.10 All documents and statistical information referred to in the text of this report can be found in appendices at the rear of this document.

2. Summary of the Proposed Developments

Introduction

- 2.1 This section summarises the content of the West Langarth and Football Club planning applications, along with a reminder of the retail and main town centre elements of the WGF, MGF and Hendra applications. A more detailed review of the content of the WGF, MGF and Hendra applications can be found in the relevant advice letters appended to this document.
- 2.2 In addition, it is also important that, when assessing the content of each application, reference is made to the commercial market factors surrounding retail development in Truro, particularly in relation to the grocery retail sector. The GVA advice letter to CC dated 11th August 2014 (contained at Appendix E to this report) outlines the issues associated with grocery retailer demand in the Truro area and separate advice has also been provided by GVA (to CC) on commercial market and viability issues. In summary, due to the number of grocery operators already present (or committed to be present) in Truro, it is highly unlikely that each of the four current proposals involving a supermarket use will be able to secure an occupier.
- 2.3 In reality, the only current active requirement for a new supermarket in the Truro area is from ASDA, who are contracted to the WGF proposal and, based on the contract with WGF, will not be able to align themselves with another proposal until after early 2018. The only other full-line grocery operator without an existing presence in Truro is Morrisons, who are unlikely to require a new store in Truro for the foreseeable future (particularly if another new store – i.e. ASDA – is introduced).
- 2.4 This situation is important for both the consideration of retail planning policy issues but also the delivery issues surrounding each scheme (as contained within the separate viability/deliverability advice provided by GVA to CC). indeed, the lack of an operator is likely to place a significant constraint upon the delivery of the supermarket elements of the MGF, Hendra and WL schemes.

Willow Green Farm

- 2.5 As set out in our advice letter at Appendix A to this report, the Willow Green Farm proposal is a mixed use proposal, covering a large area of land to the west of Truro and to the north of Threemilestone. The proposed development includes residential, retail, community, nursing home and pub/restaurant uses. Outline planning permission is sought, although access has not been reserved for future consideration.
- 2.6 The retail element comprises two parts: a Class A1 supermarket and a Class A3/4 public house/restaurant use. The supermarket will extend to 4,700sq net sales and will include 2,800sq m net devoted to the sale of convenience goods and 1,900sq m devoted to the sale of comparison goods. ASDA are the named operator for the proposed supermarket and we understand are contracted to this site. The pub/restaurant use will extend to 800sq m.
- 2.7 The WGF proposal is intended to respond to the requirement for a new district centre in Threemilestone, as set out in an adopted development brief for a large area of land to the north of the A390, which the WGF forms part. Our comments and views regarding the relationship of the WGF proposal to the aspiration for a new district centre are contained in our previous letter on the WGF scheme at Appendix A.

Maiden Green Farm

- 2.8 Our previous advice to CC on the current MGF application can be found at Appendix B to this report.
- 2.9 The hybrid planning application at MGF proposes a mixture of land uses, including a proposed 'district centre' which has the following components:
- Supermarket – 3,958sq m net
 - Class A1 non-food uses – 1,995sq m net
 - Health/medical/pharmacy use – 1,421sq m gross
 - Nursery/crèche – 240sq m gross
 - Community space – 240sq m gross
 - Public house/restaurant – 484sq m gross

- Café/bar/restaurant – 677sq m gross
 - Convenience goods Class A1 retail unit – 120sq m net.
- 2.10 The proposed supermarket will have a net sales area of 3,958sq m, comprising 2,980sq m for the sale of convenience goods and 978sq m for the sale of comparison goods. There is no named operator for the supermarket unit. In addition to the supermarket, a further 1,995sq m (net sales area) of comparison goods floorspace is proposed.
- 2.11 In relation to the non-food retail floorspace which is separate from the supermarket use, we understand that the application has offered to control this floorspace to provide six separate units. Three of the units will not exceed 185sq m, two will not exceed 330sq m and the remaining unit will be no more than 880sq m. No restrictions are offered in terms of the ranges of goods that these six units can sell.
- 2.12 Our advice letter at Appendix B also outlines our views regarding the relationship of the WGF proposal to the aspiration for a new district centre and also provides a comparison between the MGF application and the 'district centre' elements of the WGF and Hendra applications.

Hendra

- 2.13 The letter contained at Appendix C provides our previous advice to CC on the retail element of the Hendra proposal. The application contains the following elements:
- Supermarket – 6,708sq m gross / 4,360sq m net
 - A community hub comprising: four units totalling 1,928sq m gross for Class A1, A3, A3/A4, B1, D1, D2 uses and a community room (to be offered to the Community Council)
 - A 6 pump petrol filling station
 - A 455 space car park.
- 2.14 The proposed supermarket will have a net sales area of 4,360sq m, comprising 3,052sq m for the sale of convenience goods and 1,308sq m for the sale of comparison goods. There is no named operator for the supermarket unit.

- 2.15 Based upon the information provided by the applicant, the community hub could comprise some or all of the following elements: A class D2 community meeting room, Class B1 starter offices, Class A1 coffee shop, Class A3 restaurant, Class A3/4 pub restaurant and Class D1 creche.

West Langarth

- 2.16 The planning application submitted by the Inox Group and Henry Boot Developments Ltd at West Langarth is an outline application with all matters reserved except for means of access. It is a mixed use scheme comprising:
- A Class A1 supermarket of 5,575sq m gross;
 - A petrol filling station;
 - 4,645sq m gross Class A1 comparison goods floorspace;
 - 929sq m gross of Class A3/4/5 & D1 uses; and
 - Residential, recreation and associated development.
- 2.17 Section 2 of the WL August 2014 Retail Statement confirms that there are no named operators for any of the proposed Class A retail floorspace. The Retail Statement suggests that interest has been lodged by a number of operators for the A1/3/4/5 & D1 floorspace, although details of this interest have not provided and therefore we cannot place any weight upon these assertions. Indeed, we consider that there are serious doubts over the deliverability of the supermarket element of the WL given ASDA's contract with the WGF proposal. As such, and with no named operators for the comparison goods floorspace, we have treated the WL scheme as very much a speculative proposal.
- 2.18 A key argument given by the promoters of the WL scheme is that it is enabling development in order to assist the delivery of a stadium development to the east of the WL site which has already secured outline and reserved matters approval. It is not the purpose of this advice report to consider whether the proposed development can legitimately be termed 'enabling development', nor does it provide advice on the circumstances surrounding the delivery of the proposed development and financial matters. The latter two factors are considered in a separate advice report from GVA on commercial market and viability issues.

- 2.19 The proposed supermarket within the WL scheme will extend to 5,574sq m gross floorspace. Within this area, 65% (or 3,623sq m) will be net sales floorspace. In the absence of a named operator for the supermarket, the applicants have made an assumption regarding the split between convenience and comparison goods sales areas. It has been assumed that 2,536sq m (or 70%) will be devoted to convenience goods sales and the remaining 30% (1,087sq m) will be used for comparison goods sales.
- 2.20 In relation to the separate Class A1 comparison goods floorspace, the applicants have assumed that 80% (3,716sq m) of the gross retail floorspace will be net sales area. Given that the application is in outline and, like the proposed supermarket, there is no named operator interest, very few restrictions are proposed to be imposed. Therefore, we have assumed that there will not be any restrictions on the type of comparison goods which could be sold from the proposed floorspace and no restriction on the number of retail units which could be provided. However, in line with the comments made at paragraph 2.21 of the August 2014 Retail Statement, we have assumed that the minimum unit size would be 929sq m and that a limit would be placed upon the total amount of retail floorspace which could be provided.
- 2.21 We have also assumed that, based upon the contents of paragraph 2.1 of the WL August 2014 Retail Statement, the 4,645sq m of comparison goods retail floorspace would be provided in separate retail units to the proposed supermarket.
- 2.22 In relation to other Class A and D elements of the proposed development, very little detail is provided by the WL August 2014 Retail Statement. For example, of the 929sq m proposed for A3/4/5 and D1¹ uses, the split between the different use classes is not provided and it is unclear as to the format of the space which could be provided (i.e. how many separate units).
- 2.23 In relation to the 500sq m of proposed Class D1/2 floorspace, paragraph 2.1 of the WL August 2014 Retail Statement notes that it will be for a “community/sports building”, although it is unclear whether the dominant use will be sports-related.

¹ Clinics, Health centres, Crèches, Day nurseries, Day centres, Museums, Public libraries, Art galleries, Exhibition Halls, Law court, Non-residential education & training centres, Places of worship, Religious instruction, Church halls. It is permitted development to transfer a D1 use to A1/2/3 or B1 use.

- 2.24 The August 2014 Retail Statement indicates that the proposed development is intended to provide the 'western district centre' which is promoted by the development brief for the land to the north of the A390. In our previous advice on the Hendra, WGF and MGF applications, we have compared the content of each scheme against the requirements of the district centre. Whilst the WL application lies outside of the area covered by the development brief, and it is not the purpose of this report to advise upon the weight which should be placed on the development brief, we have expanded our previous analysis to incorporate the WL scheme and this can be found at Appendix J to this report.
- 2.25 The analysis at Appendix J indicates that the WL provides some of the ingredients of the district centre sought by the development brief, although there is no certainty over whether some of the elements (such as the doctors surgery and the nursery space) will be provided. In addition, given the outline nature of the application, there is little certainty over how some of the elements of the proposed development will be delivered. For example, it is unclear whether the proposed Class A3/4/5 and D1 floorspace (929sq m) will be provided in one single unit (i.e. public house) and whether the Class D1/2 'community/sports building (500sq m) will simply be for sports use or for wider community benefit.
- 2.26 In addition, whilst the WL application is submitted in outline and the submitted masterplan is only illustrative in nature, the indicative layout which is shown resembles a retail park format, dominated by the supermarket and separate comparison goods units. Indeed, it is the separate comparison goods units which take up a significant amount of space between the development and the influence that these uses have on the character and function of the proposed development is discussed later in this advice report.
- 2.27 Section 2 of the WL August 2014 Retail Statement outlines the potential turnover of the supermarket and comparison goods floorspace. The assumptions underlying these turnover estimates are explored later in this advice report, although it is clear from the applicants' Statement that, due to the scale of the floorspace and the lack of restrictions, a very wide range of goods can be sold from this element of the development. Goods which can be sold include: clothing and fashion goods, books, furniture, books, stationery, household goods, DIY goods, homewares, toys, games, electrical goods, carpets, leisure and recreation goods, health and beauty goods.

- 2.28 Working in combination with the proposed supermarket, this mix of retail floorspace has the potential to provide an attractive and popular shopping destination and, due to the range of goods sold, can provide a rival shopping destination to the city centre. This issue, including the potential scale of impact on Truro city centre, is explored later in this advice report.

The Football Club Application

- 2.29 The planning application at the Football Club has been submitted by Helical Retail Limited and is an outline application for the redevelopment of the site to provide Class A1, A3, A4, A5 and D2 retail floorspace along with associated works.
- 2.30 The application is supported by an indicative site layout plan, indicating the likely disposition of floorspace across the application site and including the maximum deviation in the layout and scale of the proposed development. The layout plan shows the arrangement of the Class A1 retail floorspace within two large blocks, one of which also includes the Class D2 floorspace. There will also be two separate Class A3/4/5 units within the site.
- 2.31 In total, the application proposes 12,545sq m of gross Class A1 floorspace, some of which could be provided at mezzanine floor level. In addition, the Class A3/4/5 floorspace totals 464sq m gross, with a further 1,003sq m for the Class D2 uses.
- 2.32 Section 4 of the Retail Assessment submitted in support of the application describes the proposals as a new *“shopping park”* which *“will provide a facility that is complementary to the existing city centre and not compete directly with its existing retailers”*. It is also suggested that the application site will be *“an accessible location for retailers that are not currently represented in Truro”*. However, despite these predictions, no further information is supplied by the application to substantiate the points made. For example, neither the name or styles of retailers are provided in the Retail Assessment and there is very little information to describe the trading style of the proposed development. We have therefore treated the Football Club application as very much a speculative proposal.
- 2.33 Further information has been requested from the application in terms of its suggestion that the proposed development will be ‘complementary’ to the city centre and in a letter dated 9th February 2015, the applicant repeats the assertions that the

development will provide *“retail floorspace that is not currently provided within the city centre”* and that *“the development seeks to provide accommodation for retailers that are not currently represented in the Truro area and that would not wish to locate their particular store formats within the city centre”*. On this latter point, no evidence is provided by the applicant to substantiate this claim.

- 2.34 In relation to the potential size and format of the Class A1 retail units which could be provided on the application site, the submitted parameters plan does not provide any information. However, an indicative retail unit layout plan has been provided and this shows nine separate retail units within the two main retail blocks. The ground floor unit areas which are shown comprise: two 560sq m units, five 686sq m units, a 919sq m unit and a 1,402 units. The indicative unit plan shows that each of these units has the potential for mezzanine floor area and the total ground and mezzanine floor areas are shown to be 6,970sq m and 5,575sq m respectively.
- 2.35 The applicant has not offered any conditions regarding the goods to be sold from the Class A1 floorspace or the number or size of retail units. We have, however, proceeded with our assessment on the basis that it will provide unrestricted comparison goods sales.
- 2.36 No information is provided by the applicant's January 2015 Retail Assessment on the proposed Class D2 floorspace. Class D2 uses include cinema, concert hall, bingo hall, dance hall, swimming bath, skating rink, gymnasium and areas for indoor or outdoor sports or recreation uses. However, we understand that the applicant intends this floorspace to be restricted to a gym use only.

3. Basis for the Updated Impact Assessment

3.1 Since the completion of our advice letters in relation to the WGF, MGF and Hendra applications, new data on shopping patterns for convenience and comparison goods has become available. This survey data has been commissioned by CC to inform an update to the 2010 Study and is accompanied by up-to-date population and per capita expenditure forecasts.

3.2 This section explains the how the new shopping patterns survey data has been used to inform our updated financial impact assessment for each of the current planning application proposals, along with the other updates which have been incorporated into our analysis.

The 2014 Cornwall Household Shopping Survey

3.3 Within our advice to CC in relation to the WGF, MGF and Hendra applications between February and May 2014, shopping patterns data, gathered in 2008 and used to inform the 2010 Study, was adopted. The same data was also adopted by the supporting material for the WGF, MGF and Hendra applications.

3.4 Our previous advice to CC raised some concern over the robustness of the 2008 survey data, given its age and the potential for shopping patterns to have changed in the interim. At the time of completing our previous advice letters there was not another comprehensive set of shopping patterns survey data which was available to supersede the 2008 survey data. However, the results of a shopping survey, undertaken in October 2014, have subsequently become available and can now be used to inform the impact assessments for each of the current proposals. Therefore, the availability of more up to date (2014) survey data has the potential to alleviate our previous concerns over the use of the 2008 shopping patterns data.

3.5 The 2014 household survey covered the same geographic area as the 2008 survey, including the same 26 constituent zones. It also possesses the same sample size and the same questionnaire. A plan showing the extent of the survey area is attached at Appendix H to this report.

- 3.6 As a consequence, the results of the 2014 survey can provide a direct replacement for the 2008, including the ability to provide an analysis in the change (if any) in convenience and comparison shopping patterns over this six year period.
- 3.7 The results of the 2014 survey have been used to calculate the market share of main and top-up food shopping destinations across Cornwall and also the market shares for stores and centres for different types of comparison goods shopping. The results of this exercise will feature in the forthcoming Retail Study Update and the analysis is also shared with the evidence base for the assessment of these applications.

Population

- 3.8 Alongside the updated household shopping survey information, we have also taken the opportunity to update the population and per capita expenditure data used in the 2010 Study. Since the publication of the 2010 Study, the 2011 Census has been conducted and the results are now available. Data from the 2011 Census has been obtained for each of the postcode sectors which form the 26 zones in the study area and has been projected forward using forecasts supplied by CC (and which conform to the house building projections being used in the emerging Cornwall Local Plan).
- 3.9 Similarly, new up to date data on per capita retail expenditure for convenience and comparison goods has been obtained from Experian. The data provided by Experian is 2013 expenditure (expressed in 2013 prices) and this has been projected forward to 2014 and 2019 using forecasts contained within Experian Retail Planner Briefing Note 12.¹².

Updated benchmark company average sales density information

- 3.10 In order to assess the current and future trading performance of convenience goods floorspace within the Truro area, along with the trading performance of new convenience and comparison goods floorspace, company average sales density from Verdict has been utilised. The data provided by Verdict is based upon a bespoke piece of research (by Verdict) which utilises the latest available financial and sales floorspace data of the main grocery operators in the UK.

² Published in October 2014

Retail commitments

- 3.11 Within our previous advice, a number of commitments for new retail floorspace within Truro and the wider central and western Cornwall areas were taken into account for both convenience and comparison goods shopping. For convenience goods shopping, the main commitment in Truro is the Waitrose / Taste of Cornwall commitment which lies on the eastern side of the city. In addition, this advice also takes into account, where appropriate, the potential for the retail element of commitments at the Hendra application site and at Langarth to provide convenience goods retail uses³.
- 3.12 In relation to comparison goods shopping, our previous advice took into account the comparison goods element of the Waitrose commitment, along with commitments in Hayle, Newquay and St Austell . However, following further work undertaken as part of the emerging Retail Study Update, there is a need to take into account the following additional commitments:
- Land adjacent to the Morrisons store in Newquay
 - Oak Tree Inn, Truro
 - Mezzanine floors in The Range and PC World stores in Truro; and
 - Additional comparison goods floorspace to be provided at Lemon Quay in Truro city centre.

³ For the purposes of our analysis, we have assumed that the Class A1 retail floorspace at the Hendra and West Langarth commitments would be occupied by convenience goods floorspace. This is an assumption as the permitted floorspace is open Class A1 and could also sell comparison goods instead. We have assumed that in both commitments the maximum amount of convenience goods floorspace is 400sq m and that this would add to the overall cumulative impact except in scenarios where it is to be replaced by an alternative scheme – i.e. the supermarket replacing the committed floorspace on the Hendra site.

4. Updated Impact Assessment for the Willow Green Farm, Maiden Green Farm and Hendra Proposals

Introduction

- 4.1 In light of the new household survey of shopping patterns, along with the new evidence base data gathered for the forthcoming Retail Study Update, we have updated our assessment of the convenience and comparison goods impact of the WGF, MGF and Hendra proposals. The updated analysis can be found at Appendix G to this report.
- 4.2 The analysis follows the same format as our previous advice to CC on these three proposals. It provides an assessment of the impact of each scheme on the convenience goods sector in Truro city centre and also an overall impact assessment for the city centre, containing both the convenience and comparison goods impacts of each scheme.
- 4.3 For the avoidance of doubt, our updated assessment makes the same assumptions as our previous assessments and is based upon the format and scale of retail floorspace explained within the retail statements supporting each application. Therefore:
- The WGF proposed is assessed on the basis of a single Class A1 supermarket unit, operated by a full line grocery retailer;
 - The MGF proposed is assessed on the basis of a single Class A1 supermarket (operated by a full line grocery retailer) plus separate comparison goods floorspace which is controlled by condition; and
 - The Hendra proposal is assessed on the basis of a single Class A1 supermarket unit operated by a full line grocery retailer.

Willow Green Farm

- 4.4 Within our previous advice, dated February 2014 (see Appendix A), we estimated that the supermarket element of the WGF proposal would have a 3% impact upon the Class A1 retail sector in Truro city centre. This was split between 7% for convenience goods

shopping and 3% for comparison goods shopping. When considered cumulatively with commitments, our previous advice indicated a 16% impact on the convenience goods sector, an 8% impact on the comparison goods sector and an overall 9% cumulative impact on the retail sector in Truro city centre.

- 4.5 Based upon the new 2014 household survey and population/expenditure data, we have updated our assessment of the convenience goods retail impact of the WGF supermarket and this updated assessment is shown in Table 4.1 below and at Tables 13d and 13e at Appendix G. For the avoidance of doubt, the impact of the WGF supermarket is based upon the company average sales density of ASDA, which is the intended occupier of the proposed store.

Table 4.1: impact of WGF proposal on convenience goods sector in Truro city centre

Centre / Store	Trade Diversion to Proposal (£m)	Solus Impact (% loss of trade)	Cumulative Impact (% loss of trade)
Co-op	£0.3m	-6%	-14%
Marks & Spencer	£0.4m	-8%	-17%
Iceland	£0.1m	-5%	-9%
Other	£0.4m	-8%	-21%
Total	£1.2m	-7%	-16%

Source: Table 13d, Appendix G

- 4.6 Our updated quantitative assessment indicates that, based upon the more up to date data inputs (i.e. survey, population and expenditure data), there is a slightly higher convenience goods turnover for Truro city centre (£18.7m, rather than the £17.1m adopted in our previous analysis).
- 4.7 In relation to individual store turnover levels, the latest analysis indicates an improved turnover for the Marks & Spencer foodhall and a similar trading level for the Co-op and Iceland stores and a similar collective turnover for the other smaller convenience goods stores in the city centre.
- 4.8 Based upon these trading performance levels, our updated impact assessment at Table 13d indicates a similar level of trade diversion from city centre convenience goods stores. The Co-op store will experience a 6% reduction in its turnover, whilst the

Marks & Spencer store will see an 8% fall in trade. The Iceland store will receive a 5% impact, whilst other stores will experience an 8% impact.

- 4.9 As set in Table 4.1 above, the cumulative levels on these stores are much higher, which is due to the impact of the forthcoming Waitrose / Taste of Cornwall development, along with the potential for convenience goods floorspace as part of the Hendra and Langarth commitments.
- 4.10 The levels of trade diversion associated with the WGF supermarket and other commitments in Truro/Threemilestone will leave the Co-op store trading above company average and the remainder of the convenience goods sector in the city centre trading below average. This is a similar situation to that observed in our previous advice on the WGF proposal. In particular, whilst it was observed that it was unlikely that stores such as the Marks & Spencer foodhall or the Co-op would close, the WGF proposal would increase the downwards pressure on the city centre's convenience sector, which is a sector that does not anchor the city centre but clearly contributes to its overall health.
- 4.11 In relation to the comparison goods impact of the proposed supermarket, we continue with our assumption that 65% of its annual turnover will be diverted from the city centre. This is equivalent to a diversion of £10.5m, which is based upon the latest company average comparison sales density for ASDA supplied by Verdict. This level of diversion is equivalent to a 2.2% solus impact on the city centre's comparison goods sector.
- 4.12 When combined with other comparison goods commitments in Truro and surrounding settlements, the overall cumulative impact on Truro city centre's comparison goods sector is 8%. This is very similar to the 3% solus and 8% cumulative impacts observed in our previous advice to CC in relation to the WGF proposal.
- 4.13 Our updated impact assessment is summarised in Table 4.2 below:

Table 4.2: total retail impact of WGF proposal on Truro city centre

Centre / Store	Trade Diversion to Proposal (£m)	Solus Impact (% loss of trade)	Cumulative Impact (% loss of trade)
Convenience	£1.2m	-7%	-16%
Comparison	£10.5m	-2%	-8%
Total	£11.7m	-2%	-8%

Source: Table 13e, Appendix G

- 4.14 Our updated quantitative assessment indicates that the comparison goods turnover of Truro has held up reasonably well in recent years, taking into account the results of the 2008 and 2014 survey data, particularly as a number of other settlements in central and west Cornwall have been experiencing fall market shares for comparison goods shopping. As a consequence of a relatively stable comparison goods turnover, along with a similar level of trade diversion, we consider that the observations of our previous advice⁴ remain valid, namely that:

On its own, an impact of 2%-3% from Willow Green Farm may not be seen as a significant adverse impact in its own right. However, it is part of a growing impact on Truro caused by the approval of retail schemes in surrounding settlements. The approval of schemes such as the Kingsley and Treloggan Road proposals in Newquay is seen by the Council as benefitting Newquay residents as it will enable shorter shopping trips and reduce leakage of retail expenditure to Truro. This obviously has a negative impact on the successful performance of Truro city centre, which is then further compounded by the impact of new out of centre floorspace in Truro such as Willow Green Farm. This situation requires a balancing exercise from the Council, balancing the perceived benefits to other settlements against the impact on Truro, leading to a reduction in its market share. Whilst a cumulative impact of 8% does not lead us to the conclusion that there is a significant cause for concern, large comparison goods areas in out of centre supermarkets in Truro do pose direct competition for the city centre.

⁴ Page 19 of our February 2014 advice on the WGF proposal, contained at Appendix A

- 4.15 Overall, we remain of the view that the WGF supermarket will have an adverse impact upon both the convenience and comparison goods sectors in Truro city centre, although the scale of the impacts associated with the proposed store should not, in our opinion, be seen as a significant adverse impact. The WGF supermarket will contribute towards a growing overall impact on Truro city centre's retail economy, although it must be appreciated that the WGF impact is a minority part of the overall cumulative impact.

Maiden Green Farm

- 4.16 A similar form of updated impact assessment has been undertaken for the Class A1 retail floorspace elements of the MGF proposal. As noted earlier in this report, the Class A1 retail floorspace in the MGF scheme comprises two elements: a supermarket and separate comparison goods floorspace.
- 4.17 Whilst the MGF supermarket is smaller than the supermarket in the WGF application, it is likely to provide a comparable style of facility, albeit one with a smaller amount of comparison goods floorspace. The notable difference between the MGF and the WGF and Hendra proposals is the separate comparison goods floorspace element. Our previous advice on the MGF proposal noted that:

"The MGF application also proposes additional Class A retail floorspace (1,995sq m net), including comparison goods floorspace and Class A3/4/5 floorspace (677sq m gross). In terms of planned investment, these types of uses are likely to be found in the forthcoming Pydar Street proposals and therefore there is the possibility of an overlap between the Pydar Street and MGF schemes. The significance of this overlap will depend, in our opinion, upon the scale of retail floorspace within the MGF scheme and how the floorspace is delivered. In particular, if the comparison goods retail floorspace at MGF is unrestricted there is the potential for MGF to accommodate retailers who would otherwise occupy space in the city centre. Therefore, on the basis that the comparison floorspace is controlled (via planning condition), overlap with the city centre retail offer can be reduced and thus aligning the planned district centre to meeting the needs of local residents rather than competing with the city centre. A similar approach should also be taken in relation to the proposed Class A3/4/5 uses. If this can be achieved then, whilst a certain amount of overlap between these proposals can never be eliminated, we do not consider that the MGF proposal will have an adverse effect on planned investment in the city centre".

- 4.18 It was on this basis that our previous assessment of the MGF proposal proceeded, with the assumption that controls would be put in place to ensure that trading overlap with

the city centre was minimised. Such controls could include the size of retail units to be provided and the range of comparison goods to be sold from the non-supermarket Class A1 retail floorspace.

- 4.19 A number of controls have been proposed by the applicant, which include the maximum size of units which can be provided. We recommend that these are accepted by the applicant and that the Council also consider reducing the size of the largest unit (880sq m) in order to bring it in line with the other proposed units and also offer some differentiation from units in the city centre.
- 4.20 The same approach has been employed for our latest impact assessment, with the results of our assessment summarised in Tables 4.3 and 4.4 below, and contained in Tables 14d and 14e at Appendix G.

Table 4.3: impact of MGF proposal on convenience goods sector in Truro city centre

Centre / Store	Trade Diversion to Proposal (£m)	Solus Impact loss trade) (% of	Cumulative Impact (% loss of trade)
Co-op	£0.3m	-6%	-14%
Marks & Spencer	£0.4m	-8%	-17%
Iceland	£0.1m	-6%	-9%
Other	£0.4m	-8%	-21%
Total	£1.2m	-7%	-17%

Source: Table 14d, Appendix G

Table 4.4: total retail impact of MGF proposal on Truro city centre

Centre / Store	Trade Diversion to Proposal (£m)	Solus Impact loss trade) (% of	Cumulative Impact (% loss of trade)
Convenience	£1.2m	-7%	-17%
Comparison	£11.9m	-3%	-8%
Total	£13.1m	-3%	-8%

Source: Table 14e, Appendix G

- 4.21 Due to the slightly larger amount of convenience goods floorspace, along with the larger amount of comparison goods floorspace, the cumulative impacts associated

with the MGF proposal are slightly larger than the WGF scheme. There will be a 7% solus impact on the city centre's convenience goods sector, rising to 17% when commitments are taken into account. For comparison goods, the solus impact on the city centre is 3%, rising to a cumulative impact of 8%.

- 4.22 These impacts are very similar to the impacts outlined in our previous advice to CC on the MGF scheme and, bearing in mind the observations made in relation to the WGF scheme above, we see no reason to depart from our previous analysis. Therefore, the Class A1 retail floorspace element of the MGF proposal will, in our view, have an adverse impact upon Truro city centre, but the scale of the impact is not so large as to classify it as a significant adverse impact. Like the WGF proposal, the MGF scheme will contribute towards a growing impact upon the retail sector in Truro city centre, with the comparison goods sector coming under particular growing pressure. However, as noted above, the impact of the comparison goods floorspace within the MGF proposal can be limited by imposing conditions on its retail offer and trading style. If the non-supermarket retail floorspace is instead unrestricted then this will intensify the impact upon the city centre, leading to: a greater financial impact and also increasing the possibility that the scheme will be able to attract comparison goods operators who would otherwise have located within the city centre (including the potential for relocations from the city centre).

Hendra

- 4.23 The final of the previous impact assessments to be updated is the one associated with the Hendra proposal. In our previous advice, we concluded that the Class A1 retail floorspace content of the Hendra proposal was likely to provide the lowest financial impact upon the retail sector in Truro city centre, although the difference between this and the impact from the WGF and MGF proposals was not materially different (assuming that appropriate controls over the retail floorspace were put in place).
- 4.24 Using the same approach as our updated impact assessments for WGF and MGF, we have updated our assessment of the impact of the Hendra scheme. Our updated assessment of convenience and comparison goods impact is contained in Tables 4.5 and 4.6 below, along with Tables 15d and 15e at Appendix G.

Table 4.5: impact of Hendra proposal on convenience goods sector in Truro city centre

Centre / Store	Trade Diversion to Proposal (£m)	Solus Impact (% loss of trade)	Cumulative Impact (% loss of trade)
Co-op	£0.3m	-6%	-13%
Marks & Spencer	£0.4m	-8%	-17%
Iceland	£0.1m	-6%	-10%
Other	£0.4m	-8%	-18%
Total	£1.3m	-7%	-15%

Source: Table 15d, Appendix G

Table 4.6: total retail impact of Hendra proposal on Truro city centre

Centre / Store	Trade Diversion to Proposal (£m)	Solus Impact (% loss of trade)	Cumulative Impact (% loss of trade)
Convenience	£1.3m	-7%	-15%
Comparison	£7.2m	-2%	-7%
Total	£8.5m	-2%	-7%

Source: Table 15e, Appendix G

- 4.25 The above data indicates that we expect the proposed supermarket on the Hendra site, based upon a convenience goods company average turnover for ASDA, to have a 7% solus impact upon the city centre's convenience goods sector, which will rise 15% when the cumulative effect of other commitments in the city is taken into account. For comparison goods, our updated assessment, which also assumes an ASDA comparison goods sales density, predicts a solus 2% impact on the city centre, rising to 7% when the impact of commitments is taken into account. Overall, our updated analysis predicts that the Hendra supermarket will have a 2% impact on Truro city centre's retail sector, which will rise to 7% when other commitments are taken into account.
- 4.26 This level of impact is very similar to the impacts associated with the WGF and MGF proposals. In line with our previous advice, the financial impact of the Hendra proposal is slightly lower than the impacts associated with the MGF and WGF schemes, although this difference is unlikely in our opinion to manifest itself into a materially different

impact upon the health of Truro city centre (assuming that the floorspace in each proposal is controlled by planning condition).

- 4.27 For the avoidance of doubt, when assessing the cumulative impact of the current Hendra application with other commitments in Truro, we have discounted the current extant planning permission on this site as implementation of the permission and the current proposal are mutually exclusive.

5. West Langarth: the Retail Planning Policy Issues

Introduction

- 5.1 Given the location and planning policy status of the WL application site, there is a need for the retail and main town centre elements of the proposed development to be assessed against the sequential approach to site selection and their impact on defined town centres. In particular, the application will be assessed against saved policies 7A, 7G and 7H in the Local Plan, paragraphs 24, 26 and 27 in the NPPF and the contents of the emerging Cornwall Local Plan.
- 5.2 In support of its application, the promoters of the WL scheme have submitted a Retail Statement, dated August 2014. The assessment of financial impact contained within the August 2014 statement is based upon survey information used within the 2010 Study and we understand that the promoters of the WL scheme are in the process of updating their financial impact assessment using the new 2014 shopping patterns survey information. At the time of finalising this report, this additional information is still awaited and therefore we have undertaken our own impact assessment and will review the additional information from the promoters of the WL scheme as and when it is submitted to CC.

The Sequential Test

- 5.3 Section 5 of the WL August 2014 Retail Statement provides the applicants' assessment of the WL proposal against the sequential test. There are a number of parts to the assessment. It starts with a suggestion that the application of the sequential test will be influenced by the applicant's case that the proposal is enabling development for the stadium project. The assessment then goes on to provide an assessment of the WL applicant site against the A390 development brief and the 2010 Study, including reference to the other three current proposals involving supermarkets in the Threemilestone area. This is followed by a discussion over how the suitability, availability and viability of alternative sites should be considered, and then a review of the conclusions drawn from the application of the sequential test to the other three applications in Threemilestone.

- 5.4 The start of the applicants' assessment deals with the issue of enabling development and how this could influence the sequential test. It is suggested that the issue of enabling development will influence how the viability of alternative sites will be considered. However, a distinction should be made here between the viability of alternative sites to accommodate what it proposed in this application and the separate issue of the viability of providing a financial contribution to the stadium project. The former factor is clearly relevant to the sequential test, although the second factor, which is preferred by the applicants, is more likely to be a separate material consideration which may influence the Council's overall conclusions on the proposal by the applicants.
- 5.5 The applicants' assessment goes on to rehearse the aspiration of the adopted Development Brief for a new district centre and also repeat the recommendation of the 2010 Study in relation to the scale and location of a new centre on the western side of Truro.
- 5.6 Despite a dismissal of the weight which can be afforded to the Development Brief in other parts of the August 2014 Retail Statement, Section 5 of the applicants' sequential analysis attempts to demonstrate that the current WL proposal is supportive of the aims of the brief particularly in relation to the provision of a new district centre. In our view, this is a contradictory part of the analysis put forward by the applicants.
- 5.7 Section 5 of the August 2014 Retail Statement suggests that there is very little difference between the current planning application sites⁵. It suggests that all sites, including the WL site, are sequentially equal as the WL proposal represents an evolution of the Development Brief and thus it fulfils the requirements of the sequential approach. However, despite the suggestion that all of the current application sites in the Threemilestone area are 'similar', the August 2014 Retail Statement goes on to use the criteria outlined in the 2010 Retail Study to assess the comparative performance of the WL site/proposal against the other retail proposals in the local area. At the conclusion of this analysis, it is suggestion that:

⁵ Paragraph 5.17

“the [WL] proposal comes out better than the alternative sites, particularly when the enabling development argument for the stadium, which is at the heart of the vision for the area, is taken into account”.

- 5.8 The factors which the applicants put forward in support of this conclusion re: the mix of uses within the current proposal; the enabling development issue; and the relationship of the site to the resident population to the west of Truro. However, none of these factors are directly relevant to the sequential test, as set out in the development plan and the NPPF. On face value, the WL proposal, like the WGF, MGF and Hendra proposals, should be assessed the suitability, availability and viability of alternative in-centre, edge or centre and more accessible/better connected out of centre sites to accommodate the proposal (taking into account the NPPF requirement for flexibility).
- 5.9 Leaving aside the other current planning application sites for one moment, the applicants’ assessment highlights that a number of other in-centre, edge-of-centre and out-of-centre sites in Truro have been dismissed by GVA and the applicants in terms of their ability to accommodate the WGF, MGF and Hendra proposals. It is correct that these other sites have been dismissed, particularly in relation to their ability to accommodate the large supermarket use proposed in those applications. Our previous advice also discussed the influence of the adopted development brief over the application of the sequential test and the approach which could be taken to proposals which can meet the aspiration for a new district centre.
- 5.10 There is also the issue of ‘disaggregation’ to take into account. Our previous advice letters have considered the potential for disaggregation, although the publication of the Rushden Lakes call-in decision⁶ has appeared to confirm current government policy in relation to this issue, namely that there should not be any attempt to disaggregate proposals involving multiple elements on to multiple sequentially preferable sites. So long as this policy remains in place, this should influence the Council’s approach to this and the other proposals in Truro/Threemilestone, although this does not allow applicants to avoid the need to demonstrate flexibility in scale and format.

⁶ After our advice on the MGF, WGF and Hendra proposals

- 5.11 Therefore, leaving aside the issue of disaggregation, we have examined the applicants' approach to flexibility. This is contained in paragraphs 5.34-5.36 of the August 2014 Retail Statement and notes the following:
- Flexibility has been shown because *"the applicant could have provided far greater retail floorspace than the site than [sic] is proposed"*.
 - There cannot be any further reduction in the scale of development proposed due to the need to financially support the stadium project.
 - It is also noted that *"whilst the application proposal does not currently propose any mezzanine floorspace, in assessment alternative sites, this option has been considered in order to reduce the footprint on the proposed development"*
 - It is also suggested that the applicant has considered reducing the car parking requirement and has examined different servicing arrangements, which would enable the proposed development to be accommodated on alternative sites.
- 5.12 In relation to the above points, we have a number of comments to make. First, the suggestion that the applicant has considered alternative parking and servicing arrangements is not supported by any detailed information. Therefore, no weight can be placed on this suggestion.
- 5.13 In relation to the suggestion that the development could have been larger, this is clearly a very easy statement for the applicant to make and it is not backed up any further evidence or analysis. In other words, simply because a proposal could have been larger than it actually is, is not a justification as to why the current scale fully demonstrates flexibility in terms of scale. Leaving aside the issue of enabling development (which is discussed below), we consider that a robust assessment on this issue would be able to demonstrate why there is a requirement for the scale of retail floorspace being proposals and why a smaller scale of development could not be achieved. This has not been provided and therefore we place no weight on the applicants' arguments in relation to scale.
- 5.14 In relation to the issue of mezzanine floors, consideration of such a format in relation to alternative sites should be welcomed although we cannot agree with the suggestion that the application proposal does not currently proposed any mezzanine floorspace. No such controls have been proposed by the applicant and given the outline nature of

the proposal there is nothing to stop mezzanine floorspace being provided or excluded.

- 5.15 The final issue is the link between the enabling development argument and the scale of retail floorspace in the current application. Clearly, if the Council agrees with the applicant's arguments on this issue and places considerable weight on the ability of the WL proposal to be an enabling development for the stadium project, then there may be some reasonableness to the applicants' arguments that this scale of floorspace is required. This advice report cannot say anything further on the issue of viability, although if the enabling development arguments are accepted and supported by the Council (including the suggestion that a smaller amount of retail floorspace would not provide the funding required) then it may be reasonable to conclude that sufficient flexibility has been demonstrated.
- 5.16 However, if the enabling development arguments are not supported, then there would be a need to consider whether further flexibility could be applied to the WL proposal. In particular, this application is submitted in outline and is speculative in nature. There are no named retailers for either the supermarket or open A1 comparison goods floorspace and, having regard to separate advice provided by GVA, there is some uncertainty over the ability of the supermarket element to gain an operator. Moreover, as we have already noted, the content of the WL proposal does not, in our opinion, conform to the natural role of a district centre, which is designed to meet the needs of the local community. There are also question marks over whether the current proposal is in line with the aspirations of the adopted development brief and the 2010 Study in terms of the content of a new centre.
- 5.17 Therefore, putting the issue of enabling development to one side, we do not consider that the WL applicants' have demonstrated sufficient flexibility in terms of scale and format. Without a robust demonstration of flexibility, we do not consider that the WL applicants can rely upon the conclusions reached on the sequential test in relation to the other three retail proposals in the Threemilestone area. Whilst all proposals involve a supermarket element, the scale of open A1 comparison goods floorspace within the WL application sets it apart from the other proposals and we do not consider that flexibility has been shown for this element.
- 5.18 Indeed, whilst the potential redevelopment of the Pydar Street area is unlikely to accommodate a supermarket use, the comparison goods floorspace within the WL

scheme is likely to be similar to the type of floorspace which could be provided at Pydar Street. Therefore, whilst consideration of the WL scheme has a whole may mean that Pydar Street should be discounted, it still has the potential to provide a sequentially preferable location for the comparison goods floorspace within the WL scheme.

- 5.19 Alongside this lack of flexibility, we have gone on to consider the relative merits of the WL site against the other three proposals in the Threemilestone area. Given that all four sites are located in out of centre locations, the focus for the sequential analysis should be on the comparative accessibility and linkages of the sites in relation to Truro city centre. Whilst factors relating to the content of the proposal, along with the weight to be given to the enabling development argument and general accessibility matters may be material considerations, they are not material to the sequential test as set out in paragraph 24 of the NPPF.
- 5.20 A further factor which may be relevant is the aspiration within the adopted Development Brief for a new district centre on the western side of Truro. Again, this is a separate matter from the sequential test, but may be a factor which enables the Council to choose between the schemes and this is discussed later in this section.
- 5.21 The applicants' analysis is silent in relation to the relevant factors set out in paragraph 24 of the NPPF. It offers no assessment as to whether the WL site is either sequentially equal or preferable to any of the other three nearby application sites and simply repeats the conclusion of GVA that the Hendra, WGF and MGF are sequentially equal.
- 5.22 As shown on the plan at Appendix I, the WL site is further away from Truro city centre than the Hendra, WGF and MGF sites. However, given that the distances from all four sites are considerable, we do not consider that the extra distance between the Hendra, WGF and MGF sites and the WL site will lead to materially different scale of connectivity or linkage. Indeed, it is our view that there will be very few linkages between these sites and the city centre and as small difference between the sites will be immaterial.
- 5.23 In relation to differences between the accessibility of each site and the city centre, it is difficult in our opinion to see how a material difference between the sites can be reached. However, as noted in our previous advice on the Hendra, WGF and MGF proposals, this is a matter for the Council to reach a conclusion on with particular

regard to existing and proposed public transport accessibility between each site and the city centre.

- 5.24 Should the Council reach the conclusion that there is no material difference between the four current application sites in Threemilestone, the WL site should be classed as sequentially equal to the MGF, WGF and Hendra sites.

Conclusions

- 5.25 Overall, we consider that the West Langarth proposal has not demonstrated compliance with the sequential test. This is a speculative application, with no indication of the operators for any of the proposed retail units and, whilst there is unlikely to be a suitable alternative site for a supermarket use within or on the edge of Truro city centre, there has not been a robust demonstration of flexibility in terms of scale and format (particularly in relation to the comparison goods floorspace element). As a consequence, along with the opportunities presented by the Pydar Street area to accommodate comparison good floorspace, we consider that the West Langarth proposal has not satisfied the sequential test in relation to paragraph 24 of the NPPF or policies 7A and 7H of the adopted Local Plan.

Impact

- 5.26 In line with the other proposals in Threemilestone, we have considered the WL proposals against the two impact criteria in the NPPF, namely: impact on town centre vitality and viability; and, impact on town centre investment. Each criterion is considered in turn below.

Impact on town centre vitality and viability

- 5.27 As noted earlier in this section, the promoters of the WL scheme have submitted a Retail Statement (dated August 2014) which deals with retail impact issues. However, we understand that the promoters have taken the decision to update their financial impact assessment based upon the recently released shopping patterns survey information. This new information will supersede part of the August 2014 Retail Statement and, therefore, with the reduced weight to be placed on the August 2014, and the new assessment still awaited, we have conducted our own assessment of impact. This has considered both the supermarket and open A1 comparison goods

floorspace within the WL proposal and the results of our assessment can be found in Tables 16a-16e and 18a-18c at Appendix G.

- 5.28 In relation to the impact of the convenience goods element of the proposed supermarket, our assessment at Table 16d at Appendix G shows the level of trade diversion from stores in Truro city centre and this is summarised in Table 5.1 below.

Table 5.1: impact of WL proposal on convenience goods sector in Truro city centre

Centre / Store	Trade Diversion to Proposal (£m)	Solus Impact (% loss of trade)	Cumulative Impact (% loss of trade)
Co-op	£0.3m	-5%	-13%
Marks & Spencer	£0.4m	-7%	-16%
Iceland	£0.1m	-5%	-9%
Other	£0.3m	-7%	-20%
Total	£1.0m	-6%	-16%

Source: Table 16d, Appendix G

- 5.29 Table 5.1 indicates that the WL supermarket will divert around £1.0m of convenience goods expenditure from the city centre's convenience goods sector. This is a similar level to the WGF, MGF and Hendra proposals and will result in a 6% solus impact upon this retail sector. When considered cumulatively with other commitments, the impact on the city centre's convenience goods sector rises to 16%.
- 5.30 Given the similarity of this impact to our updated impact assessment for the WGF, MGF and Hendra proposals, the conclusions given in relation to those schemes will also apply to the convenience goods element of the WL proposal.
- 5.31 Turning to the comparison goods floorspace element, this is an area which could potentially distinguish between the WL scheme from the other three proposals in the Threemilestone area. Not only does the WL supermarket have a large comparison goods floorspace element, but it also proposes 4,645sq m of unrestricted open A1 comparison goods floorspace.
- 5.32 Our assessment of the impact of the proposed comparison goods floorspace is provided in Tables 18a-18c at Appendix G. Within this assessment we have assumed

that the non-supermarket comparison goods floorspace has the potential to sell a wide range of goods and has the potential to compete directly with the city centre in terms of clothes, fashion, recreational, personal and luxury goods. Clearly, a number of alternative scenarios are available for this floorspace, but in the interests of providing a robust assessment we have prepared our assessment on the basis that the development will concentrate upon non-bulky comparison goods sales.

- 5.33 Table 18c at Appendix G indicates that, based upon the potential trading characteristics of the proposed non-supermarket floorspace and current shopping patterns, around £14.7m of comparison goods expenditure will be drawn from other stores in Truro. Of this amount, we consider that around £13.4m could be drawn from the city centre.
- 5.34 Added to this diversion will be the impact of the comparison goods floorspace element of the proposed supermarket. We consider that this will boost the impact on the city centre's comparison goods sector to £19.5m. As set out in Table 16e at Appendix G, this level of diversion is equivalent to a 4% solus impact upon the city centre's comparison goods sector which will be rise to 10% when other commitments are taken into account.
- 5.35 Table 5.2 below summarises the convenience and comparison goods impacts associated with the WL proposal and notes that, overall, the WL scheme will remove 4% of the city centre's turnover. This can be compared against a 2% impact from the Hendra and WGF proposals and a 3% impact associated with the MGF proposal. When combined with other commitments, the cumulative impact on the city centre rises to 10%, which can be compared with the cumulative impact of 7% for Hendra and a cumulative impact of 8% for either the MGF or WGF schemes.

Table 5.2: total retail impact of WL proposal on Truro city centre

Centre / Store	Trade Diversion to Proposal (£m)	Solus Impact (% loss of trade)	Cumulative Impact (% loss of trade)
Convenience	£1.0m	-6%	-16%
Comparison	£19.5m	-4%	-10%
Total	£20.5m	-4%	-10%

Source: Table 16e, Appendix G

5.36 Not only will the WL proposal have the highest financial impact of the four current proposals in the Threemilestone area, but it also has the potential to exhibit a number of other adverse impacts upon the city centre. These are: a higher intensity of overall impact due to the type of retail floorspace provided; the potential for relocations from the city centre and also the potential for the development to attract comparison goods retailers who would otherwise locate within the city centre. These factors separate the WL proposal from the WGF, MGF and Hendra proposals and suggest to us that it will have a more severe level of impact on the city centre. Indeed, because of the level of competition posed by the open A1 comparison goods floorspace, plus the additional impact associated with the WL proposed supermarket, and then combined with existing commitments, it is our view that the WL scheme is likely to contribute towards a significant adverse impact upon the health of Truro city centre. In reaching this conclusion, we have taken into account the same factors used in our previous advice on the other three Threemilestone proposals, namely:

- The health of the city centre. The city centre is in a good state of health and has been so for a number of years. The centre remains the most popular shopping destination in Cornwall for comparison goods shopping and its comparison retail sector has been built up over recent years to support this role. However, with this success, comes a potential threat as the city centre is likely to be the focus for an adverse impact where new unrestricted comparison goods floorspace is provided, in both Truro and in other settlements across Cornwall.
- The catchment of the city centre and trading profile. The city centre, due to its role and function, has a large catchment area and is a particularly popular shopping destination for non-bulky comparison goods shopping. Clothes and fashion retailers play a particularly important role in underpinning the health of the city centre and the unrestricted nature of the proposed comparison goods floorspace at the WL site has the potential to compete directly with the centre's role and function.
- The potential for store closures and relocations. Due to the size of the retail units which could be provided within the WL development, we consider that there is a very real potential for the WL scheme to attract comparison goods retailers away from the city centre (via relocations) and also accommodate comparison goods retailers who would otherwise have sought to occupy space within the city centre.

- The intensity of the competition posed by the development. Due to the scale of comparison goods floorspace proposed for the WL site, along with the wide range of goods which can be sold from the development, there is the very real potential for the WL development to provide a rival shopping destination to the city centre.
- The proportion of cumulative impact attributable to the proposal. In line with the other three proposals in the Threemilestone area, the direct impacts associated with the WL proposal are not the total level of impact associated with the city centre. Other commitments, including those elsewhere in Truro and Threemilestone, plus those in other settlements, will add a further level of impact on to the city centre economy. However, the difference between the WL proposal and the other current applications in Threemilestone is that it will contribute a materially higher proportion of the cumulative impact than the other schemes.

Impact on town centre investment

- 5.37 Within our advice on the impact of the WGF, MGF and Hendra proposals, we concluded that the proposed supermarkets were not likely to adversely affect existing or planned investment within Truro city centre. The basis for this conclusion was the lack of any proposed supermarket/foodstore developments in the city centre and the differentiation between the proposed supermarkets and the city centre in terms of trading overlap (assuming that the proposed retail floorspace would be controlled by planning condition).
- 5.38 On the basis of this reasoning we see no reason to reach a different conclusion in relation to the supermarket element of the WL proposal when considered in isolation.
- 5.39 However, a separate set of considerations should be applied to the large amount of unrestricted comparison goods floorspace within the WL scheme.
- 5.40 As already noted, the comparison goods floorspace within the WL scheme has the potential to exhibit a higher degree of impact and competition with the city centre, due to the range of goods which can be sold. This trading profile brings it into direct competition with both existing businesses in the city centre and also those wishing to invest in the centre. In relation to planned city centre investment, the project which is of relevance is the Pydar Street site. Proposals to redevelop the Pydar Street area have been around for a number of years and it is reasonable to say that progress has been

slow to date. However, in recent years part of the site has been acquired by Stanhope and LaSalle Investment Management and we understand that these parties are in on-going discussions with the Council, who own the remainder of the site, regarding the delivery of a redevelopment scheme.

5.41 Based upon the content of the Inspector's report for the recent Rushden Lakes call-in decision, the current status of Pydar Street proposals may not currently fit comfortably with the Inspector's definition of 'planned investment'. On that basis, it may be argued that the WL scheme cannot be resisted on the basis of the 'impact on investment' test, although we consider it relevant to highlight a number of matters:

- First, we understand that the Pydar Street redevelopment proposals from Stanhope and LaSalle remain focused upon a comparison goods retail led mixed use scheme. As a consequence, it is likely that the Pydar Street and WL proposals will be competing for the same market opportunity and the same comparison goods retailers. Whilst one scheme is located in the city centre and the other is out of centre, there is unlikely to be any material difference between the type of retailer which could be attracted to either scheme.
- Second, as the Pydar Street scheme continues to progress and move forward, it is likely to have a better relationship with the Rushden Lakes' definition of 'planning investment'.
- Third, even if the Pydar Street scheme cannot currently meet the Rushden Lakes definition of 'planning investment' it remains relevant that the approval now of new unrestricted comparison goods floorspace in an out of centre location in Truro could well stop the progress of that scheme, even though it is an embryonic stage.

5.42 In light of the above, and whilst we are conscious of the observations of the Rushden Lakes decision, this is little doubt in our mind that the WL proposal has the potential to attract retailers who could also occupy space at a future development at Pydar Street. This, therefore, has the potential to affect the commercial attractiveness of the Pydar Street proposal, which can become a city centre investment project. Given the current status of the Pydar Street scheme, it is possible that reduced weight should be attached to this particular issue at the present time although, should the Council have confidence that the redevelopment proposals will move forward in the short term, then

we would recommend that consideration is given to this issue become a further adverse impact of the WL proposal.

- 5.43 The other aspect of the 'impact on investment' test is the impact on existing investment. This test relates, in our view, to the effect that the proposed development could have on the ability of existing businesses (retailers, landlords etc) to continue to invest in the city centre. An integral element of a healthy centre is the ability for existing traders and landlords to invest in their property and businesses. Investment is required to keep commercial property attractive. It is also required to keep retail and service businesses attractive and relevant for their customers' needs. The retail sector continues to evolve and retailers must keep pace with their competition, and to do this they must invest in their businesses.
- 5.44 However, in order to invest businesses must have a reasonable level of viability and confidence. We consider that, due to the wide range of products which the WL proposal could sell, coupled with its financial impact and the impact of large-scale commitments elsewhere, the cumulative effect could be to affect viability and confidence. Confidence will be affected by falling turnover levels and direct competition from the WL proposal and other commitments further afield. Falling confidence could manifest itself in falling investment by businesses and this will be contributory factor in the overall significant adverse impact upon the health of the city centre.

Conclusions

- 5.45 Our assessment of the potential impact of the retail element of the WL proposal has found that there is the potential for a significant adverse impact on the health of Truro city centre. Like the WGF, MGF and Hendra proposals, the supermarket element of the WL proposal will have an adverse impact on the city centre although on its own this is unlikely to have a significant adverse impact. However, the unrestricted nature of the proposed comparison goods floorspace is likely to have a more significant effect upon the city centre, due to the scale of floorspace proposed, the unrestricted nature of the floorspace and the ability to attract retailers away from the city centre. When combined with the supermarket element of the proposed development and existing commitments, the WL proposal is likely, in our opinion, to exhibit a significant adverse impact upon the vitality and viability of the city centre.

- 5.46 This impact could also be accompanied by an adverse impact upon investment within the city centre. The characteristics of the proposed development mean that there is the potential for an adverse impact upon existing investment in the city centre and there is also the potential for an adverse impact upon planned investment, although we appreciate that investment at the Pydar Street site remains at an early stage.
- 5.47 As a consequence of the above, it is our opinion that the WL proposal, due to the significance of the impact on Truro city centre, is contrary to saved policies 7A and 7H of the Carrick Local Plan and paragraph 26 of the NPPF. If the Council shares these concerns and agrees with these conclusions then we recommend that the Council considers refusal of this application under policies 7A and 7H of the Local Plan and also paragraph 27 of the NPPF (which directs local planning authorities to refuse applications which are likely to have a significant adverse impact on either the health and/or investment in town centres).

6. The Football Club Proposal: the Retail Planning Policy Issues

Introduction

- 6.1 This section of our advice report examines the salient retail planning policy issues associated with the proposed development of Class A and D floorspace at the Football Club site. The site lies outside of any defined centre in the retail hierarchy and is not allocated for retail development in the development. Therefore, there will be a requirement for the Council to consider this proposal against the sequential test and its impact on nearby defined town centres (particularly Truro city centre).
- 6.2 When conducting our assessment, we have reviewed the contents of a Retail Assessment, dated January 2015 (and prepared by Turley), which has been submitted in support of the Football Club application. In addition, following some initial queries from GVA, supplementary information has been submitted by Turley in a letter to CC dated 9th February 2015.

The sequential approach to site selection

- 6.3 Given the out of centre location of the Football Club site there is a need to consider whether there are any suitable, available and viable in-centre or edge-of-centre sites, or more accessible and better connected out-of-centre sites, that can accommodate the proposed development (taking into account the need for flexibility).
- 6.4 Section 7 of the applicant's Retail Assessment provides an analysis of the proposed development against the sequential test, starting with an overview of its approach to the assessment, followed by the parameters that have been adopted in its assessment and then a review of alternative sites.
- 6.5 In relation to the applicant's approach to the sequential assessment, the contents of the recent Dundee Supreme Court Judgement and Rushden Lakes call-in decision are highlighted, in particular the applicant's interpretation of the approach to assessing the suitability of alternative sites.

- 6.6 With regards to flexibility, which is a requirement of the NPPF and NPPG, there is very little information within the applicant's Retail Assessment to explain how it has approached this issue. Paragraph 7.13 of the Assessment notes that *"more central sites and units [have been considered] based on a flexible approach that considers a range of potential sites of all sizes, including smaller retail units to deliver the proposed development"*. No further information is provided within the Retail Assessment, although the letter from Turley dated 9th February suggests that alternative sites have been assessed on the basis of *"accommodating [a] minimum of two retail units and a minimum single floorspace size of 1,000sq m per unit"*.
- 6.7 This provides important information regarding the applicant's assessment. First, it confirms that there is the potential for considerable flexibility in the retail space that the applicant could provide at the Football Club site. In particular, the applicant confirms that a considerable reduction in space can be accommodated, which is unsurprising given the outline and speculative nature of the application, along with the confirmation within the applicant's Retail Assessment that the scheme is not currently associated with any retailers. Therefore, the applicant has not offered any justification as to why the scale and form of the proposal must be similar to the layout shown on the submitted plans.
- 6.8 However, alongside the flexibility which has been acknowledged in terms of the scale of floorspace, there also appears to be a lack of flexibility in relation to the size of individual retail unit sizes. The 9th February letter suggests that a minimum retail unit size of 1,000sq m has been imposed when assessing alternative sites. However, this is no smaller than some of the units shown on the indicative retail layout plans. In the absence of any retailers to demonstrate the scale and format of units which are required in the context of Truro, we consider that this shows a lack of flexibility. Moreover, given that the application is submitted in outline and there is no certainty that the retail units shown on the indicative layout plan will be delivered in this format, it is entirely possible that smaller units could also be provided.
- 6.9 Therefore, in summary, whilst the applicant has confirmed that there is flexibility in the amount of Class A1 retail floorspace within the Football Club proposal, there is a lack of flexibility in relation to the approach to individual retail units.
- 6.10 In relation to the assessment of alternative sites in Truro, a number of locations have been considered. These include: Pydar Street, Moorfield car park, the Pannier Market,
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Old Bridge Street car park, Fairmantle Street, High Cross car park, Garras Wharf, Old County Hall, Newnham Industrial Estate, the former Truro Police Station site and Threemilestone Industrial Estate⁷.

- 6.11 Of these sites, the site which has historically been connected with a comparison goods retail floorspace redevelopment scheme is Pydar Street. As noted in the previous section of this advice report, the Pydar Street area has two land owners (Stanhope and Cornwall Council) and we understand that negotiations between these two parties have been taking place in order make this area available and bring it forward for redevelopment. The Council occupy a substantial amount of space within this site and we understand that plans are now in place to relocate the current office functions to another location. There are other elements to this area, including a car park which may need to be re-provided for in any redevelopment scheme, whilst there are other businesses which would also require relocation.
- 6.12 The applicant's assessment highlights the re-letting of one unit to Roseland Furniture as a sign that the sign is not available. However, no information on the leasehold arrangements for this unit have been provided to support this statement.
- 6.13 Beyond the highlighting of the existing occupiers on this site, the applicant's analysis is limited and simply concludes that this area is not considered to be available in the short to medium term. Whilst the Pydar Street area is complex, due to ownerships and occupiers, this is in no way different to other similar city centre redevelopment sites across the UK and it therefore should not be seen as a sign that the site is unavailable. City and town centre sites are generally acknowledged to be complex and that is why the previous PPS4 Practice Guidance indicated that such sites can take 10-15 years to come forwards. As a consequence, and also due to the lack of detailed investigations undertaken by the applicant, we consider that the availability of the Pydar Street area has been dismissed too easily.
- 6.14 The other factor which has led the applicant to dismiss the Pydar Street areas is the assertion that it will not provide the same type and scale of retail units as the Football Club proposal. No further analysis is provided to substantiate this assertion, save for the

⁷ Some of these sites can be immediately discounted, such as Old County Hall (being converted into a hotel) and the

suggestion that topography and the need to provide a mix of uses can offer constraints. However, in our view, it is difficult to see how the applicant can legitimately come to the conclusion that retailers who would be attracted to the Football Club site would not be attracted to the Pydar Street as well. No analysis of the site has been undertaken in order to reach this conclusion and it is our view that the redevelopment of the Pydar Street site will not just encompass small retail units. Instead, it offers the opportunities for provide a range of small, medium and large unit sizes, including department store anchors. Indeed, the same is true for the Football Club proposals, which also offer the same potential for small, medium and large units.

- 6.15 There is also no evidence to substantiate the applicant's claim that the Football Club and Pydar Street sites are complementary in terms of the retailers that they can attract. If this was a credible argument, then evidence would have been out forward to explain what the material differences are. However, no such evidence has been forthcoming.
- 6.16 Therefore, it is our view that the Pydar Street site has the potential to offer a suitable and available sequentially preferable location to the Football Club site. Whilst it is a complex site, we consider that it can offer the ability to provide a similar scale and form of retail floorspace as the Football Club site and there is the intention by the owners of the site to make it available and bring it forward for development. Alongside our conclusion that the Pydar Street site offers a suitable alternative sequentially preferable location to the Football Club site, the Council, working with Stanhope and LaSalle Investment Management, will need to demonstrate that it offers a viable development proposition, that a development scheme can be progressed and that site is available within a reasonable period of time. We consider that there is considerable potential in this site and we would recommend that the Council works with Stanhope and LaSalle to progress this opportunity.

Conclusions

- 6.17 Overall, having regard to the information submitted by the applicant, we do not consider that the proposed development at the Football Club site has demonstrated
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former Police Station which is being redeveloped for retirement living accommodation

compliance with the sequential test. In particular, it is clear from the applicant's own analysis that there is a considerable amount of flexibility in the proposed development, particularly due to the outline nature of the proposals and the lack of named retailers, and the applicant has not been able to demonstrate to us that the scale and type of retail floorspace cannot be accommodated within the redevelopment of the Pydar Street site in Truro city centre. The Pydar Street site has a history of being promoted for comparison goods retail uses and we understand that both current land owners are discussing the opportunities for a redevelopment scheme. We consider that Pydar Street offers a suitable alternative and we understand that plans are in place for the Council to vacate the site. There is, in our opinion, considerable potential in this site, although the Council, working with Stanhope and LaSalle Investment Management, will need to demonstrate that it offers a viable development proposition, that a development scheme can be progressed and that site is available within a reasonable period of time. If the Council shares this view and can see opportunities for a development scheme to be progressed then we would recommend that the Council consider refusing the Football Club application on the basis of a conflict with paragraph 24 of the NPPF and policies 7A and 7H of the Local Plan.

Impact

- 6.18 Given the scale and location of the retail proposals at the Football Club site, there is a need to assess the impact of the proposal against the two criteria set out in paragraph 26 of the NPPF:
- 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 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.
- 6.19 We outline our views on the relationship of the proposed development to these two tests in turn below.

The impact of the proposal on town centre vitality and viability

6.20 The basis for the applicant's assessment of impact can be found in Section 8 of the submitted Retail Assessment and updated by the letter of 9th February 2015. The assessment has taken the opportunity to include the results of the 2014 household shopping survey, which is to be welcomed and we outline below our comments on the general approach adopted by the applicant's assessment:

- Study area. The study area adopted for the assessment is the same as the 2014 household survey and also the Retail Study Update. This is to be welcomed and shows consistency with the Council's own approach. The wider study area is then broken down by the applicant into a core catchment (Zones 5 & 7-13) and an outer catchment (Zones 1-4, 6, 14-18, 21 & 22).
- Population. The applicant's assessment sources its population data from Pitney Bowes. Only data for zones 5 & 7-13 is provided by the applicant and we have undertaken a comparison with the data which CC and GVA have adopted for the Retail Study update. This comparison is shown in Table 6.1 below and indicates that whilst there are instances in some zones where the Retail Study Update adopts higher data, the general picture is that the Football Club assessment over-estimates the resident population in zones 5 & 7-13. This could lead to an over-estimate of the amount of future available comparison goods expenditure within the core catchment area.

Table 6.1 comparison between Football Club assessment and Retail Study Update population data within zones 5 & 7-13

		5	7	8	9	10	11	12	13	Total
2015	Turley	41664	13182	13020	20307	28953	13241	10286	39090	179743
	GVA / CC	41239	13688	12702	19741	29837	12765	9606	38105	177684
	Difference	425	-506	318	566	-884	476	680	985	2059
2020	Turley	43374	13470	13972	20941	29866	14293	11245	42167	189328
	GVA / CC	42683	14209	13762	19851	31592	13198	9782	40254	185331
	Difference	691	-739	210	1090	-1726	1095	1463	1913	3997

- Per capita expenditure. The applicant's assessment sources its data from Pitney Bowes (using 2013 base spending levels) and then projects this data forward on the basis of ultra-long term growth rates of +4.9% per annum. This level of annual increase is well above the economic forecasts used by GVA and CC in the Retail

Study Update⁸ which are based upon recommendations by Experian. We consider that the use of ultra-long term trends, which are not forecasts, has the potential to over-estimate the amount of future expenditure growth in the catchment (as past trends are heavily influenced by the spending boom during the last decade and also during the 1980s/1990s). This exceptional growth may not be repeated and therefore, past trends are liable to be over-estimates going forward.

- Survey data. As noted above, the applicant's assessment has utilised the results of the 2014 household survey. This is to be welcomed as it has the potential to offer consistency with the Retail Study Update. We cannot make a direct comparison between the applicant's assessment and the draft version of the Retail Study data as only a summary has been provided, although it would appear that the applicant may have over-estimated the turnover of the city centre which is likely to be due, at least in part, to the over-estimated population and expenditure data utilised by the applicant's assessment.
- Turnover of the proposed comparison goods floorspace. In order to estimate the turnover of the proposed comparison goods floorspace, the applicant's assessment has assumed a net sales area of 12,545sq m and a density of £5,000/sq m at 2015 (rising to £5,466/sq m⁹) at 2020. We consider that these sales densities are reasonable for the purposes of the applicant's assessment
- Trade draw to the proposed comparison goods floorspace. Table 6 (at Appendix 2) of the applicant's assessment outlines the pattern of trade draw to the proposed comparison goods floorspace. It assumes that 66% of the proposals turnover will come from residents of zones 5 & 7-13, which is a slightly higher proportion than the 59% of turnover which existing comparison goods stores in Truro draw from these zones¹⁰. 33% of the remaining 34% of turnover for the proposal is assumed to come from the outer catchment area¹¹. This is slightly lower than the draw of existing stores. However, despite these small differences, we do not consider that the pattern outlined by the applicant is unreasonable or unrealistic.

⁸ +5.6% in 2014, +4.4% in 2015 and +3.1% between 2016-2020

⁹ In order to take into account the effects of increases in floorspace efficiency

¹⁰ According to the applicant's assessment

¹¹ Which the applicant assumes to be all other survey zones in the study area except for zones 19, 20 and 23-26

- Commitments. Following an initial review of the applicant's January 2015 Retail Assessment, we asked the applicant to reconsider the number of commitments which were included in its original assessment. It has done so, and the 9th February 2015 letter provides an expanded assessment which we consider better reflects the other developments which have the potential to contribute to the wider cumulative impact upon Truro city centre. Having reviewed the updated assessment we do however have a few concerns regarding its contents. For example, some of the floorspace and sales density estimates appear to be under-estimates and, most importantly, we are concerned that there has been an under-estimate of the amount of trade which will be diverted from Truro city centre to these commitments.

- 6.21 In light of the above, including our concerns over the applicant's analysis, we have conducted our own assessment of impact of the Football Club proposal. Like our assessment of the other proposals, our assessment is based upon the analysis within the emerging Retail Study Update (including the results of the 2014 household survey) and is contained within Tables 19a to 19d at Appendix G.
- 6.22 As the basis for our assessment, we have adopted the same base (2015) total turnover level and then making allowances for increases in turnover efficiency (up to 2019) and also assumed a similar pattern of trade draw to the proposed new floorspace. Also, when making our assessment of the pattern of trade diversion to the proposed comparison goods floorspace, we have had regard to current shopping patterns for comparison goods and also the potential for the proposed floorspace to sell a wide range of comparison goods. Indeed, when considering the possible pattern of diversion, it is important to acknowledge that a number of different trading scenarios for the Football Club development are possible and this can affect how the development competes with existing facilities. However, given the unrestricted nature of the proposed floorspace, and the range of unit sizes that will be on offer to potential occupiers, then we have assumed a worst-case scenario whereby the development can accommodate a number of clothes and fashion retailers in addition to mixed goods retailers and possibly a large department store style format as well.
- 6.23 The results of our assessment are shown at Table 19c at Appendix G. It indicates that of the £67m of comparison goods expenditure which could be attracted to the

proposed development, some £51m will come from stores in Truro and Threemilestone. Given the unrestricted nature of the proposed floorspace, we consider it very likely that some £47m of this expenditure could be diverted from the city centre. Table 19d at Appendix G indicates that such a level of diversion would be equivalent to a 10% solus impact upon the city centre, which would rise to 15% when the impact of commitments is taken into account.

- 6.24 This level of diversion is considerably higher than estimated by the applicant, who considers that an impact of £30m is more appropriate. Given the numerous possibilities for the proposed retail floorspace, we cannot agree with the applicant's estimate as we consider it under-estimates the amount of competition that the proposed development will pose.
- 6.25 Table 19d at Appendix G indicates that, even though the proposed development will not have any impact upon the convenience goods sector within Truro city centre (due to the lack of convenience goods sales at the proposed development), the Football Club proposal will still have a 10% impact on the whole of the Class A1 retail sector in the city centre. This is significantly higher than the WGF, MGF and Hendra proposals and also higher than the West Langarth proposal (although the difference is less pronounced).
- 6.26 In terms of the consequences of this impact, there are a number of factors to consider: the direct financial impact, the trading overlap between the proposal and the city centre, the potential for relocations from the city centre and the overall effect on vitality in the centre.
- 6.27 We consider that the Football Club development will divert around £47m of comparison goods expenditure from the city centre. This will be in addition to the £40m of comparison goods expenditure which will also be lost to commitments in the city and elsewhere. For the avoidance of doubt, these figures do not include the potential impact of one or both of the large comparison goods led retail proposals at Marsh Lane in Hayle (adjacent to the A30) which will add an additional negative financial impact on to the city centre economy.
- 6.28 These impacts are equivalent to a 15% loss in trade for the city centre and, whilst Truro has enjoyed a good trading performance over recent years, it is not immune to harmful impacts. This is demonstrated by the finite amount of expenditure to support both

existing and new comparison goods floorspace in Cornwall. Due to the very flexible nature of the permission sought by the applicants, it is not possible to be precise over store closures, as the development could take a number of forms and also change over time. Indeed, rather than lessening the impact on the city centre, this has the potential to increase the severity as all parts of the comparison goods sector in the centre are vulnerable.

- 6.29 Given the large financial impact upon the city centre, it is important to consider the role and contribution of the comparison goods sector. The most recent Experian GOAD land use survey of Truro city centre was undertaken in September 2013 and whilst the applicant has updated this survey none of the details have been provided in its Retail Assessment. The GOAD data reveals that 52% of all retail units in the city centre are comparison goods retailers which is well above the national average of 41%. In terms of floorspace, comparison goods retailers occupy 60% of all retail floorspace, compared with a national average of 45%. This data shows the importance of the comparison goods sector to the city centre economy which is also reflected in the contribution that the sector makes in terms of turnover. Indeed, we consider that the comparison goods sector performs an anchor role for the city centre and this will provide an important consideration for the Council as an impact on the comparison goods sector could have a wider impact on the city centre generally.
- 6.30 Looking at specific comparison goods sectors in the city centre, whilst it is important to note that there's no certainty over exact type of retailer or goods which will be provided in the Football Club development, it is a reasonable prediction that clothes, fashion, recreation and mixed goods retailers will be a particular focus. The latest GOAD land use data for the city centre confirms that clothes and fashion retailers make an important contribution to the city centre. 19% of all retailers and service uses in the city centre are clothes and fashion retailers and these stores occupy one fifth (21%) of all retail and service floorspace. In addition, department stores (such as Marks & Spencer and Debenhams) occupy a further 10% of all floorspace. Indeed, clothes and fashion retailers contribute around 40% of the total amount spent on comparison goods in the city centre by residents of the study area. This data shows the importance of the clothes, fashion and mixed goods sectors to the city centre and it is these sectors that we consider will be most affected by the proposed comparison goods floorspace within the Football Club site development.

- 6.31 A further factor to consider is the potential for the relocation of retailers away from the city centre to the new development at the Football Club site. Despite the applicant's suggestion that the proposed development will provide a complementary shopping facility to the city centre and attract retailers that cannot find space in the centre, we are of the view that there is no barrier to existing retailers in Truro deciding to relocate from the city centre to the application site. The lack of goods restrictions and the opportunities that the proposed retail units can offer will mean that relocations can easily occur as a when leases end or break clause is triggered. Such a scenario will further intensify the impact on the centre as there is a concern that key retailers could be lost.
- 6.32 A similar concern exists in relation to new retailers wishing to take space in Truro. Over recent years Truro has been able to attract the interest of a number of retailers and there remains the potential for further retailers to be attracted. Whilst the availability of space can be a constraint for retailers wishing to locate in the city centre, premises do become available and, in addition, there is an example of an owner (at Lemon Quay) deciding to invest in its property in order to attract a new national multiple retailer (Primark) to the city. Therefore, the availability of a considerable amount of unconstrained space at the Football Club has the potential to divert retailer interest away from the city centre.
- 6.33 Overall, there are a number of factors which lead us to the conclusion that the Football Club proposal is likely to have a significant adverse impact upon the health of the city centre. These factors are the direct financial impact of the proposal, the direct and sustained competition that the new development will pose for the comparison goods sector in the city centre (which performs an anchor role and provides benefits to the wider city centre environment), along with the potential to attract comparison goods retailers away from the city centre. These factors, both by themselves and combined with other extant commitments, will lead to a significant impact upon vitality and viability levels in the city centre. Vitality levels could be particularly affected, given the scale of the new development which will provide a rival retail destination to the centre and thus reduce the need to go to the centre for comparison goods shopping.

The impact of the proposal on investment

- 6.34 The NPPF test in relation to town centre investment relates to existing, planned and committed investment.

- 6.35 As noted in our analysis of the West Langarth proposal, a potential project to be classified under the banner of 'planned investment' is the redevelopment of the Pydar Street area for a retail-led mixed use development. We have, however, noted that the weight which can be placed on this project is, at present, reduced due the stage of the proposals. Therefore, the previous comments apply equally to the Football Club application as well.
- 6.36 Nevertheless, the previous analysis does explain how the provision of unrestricted comparison goods floorspace in out of centre locations in Truro has the potential to affect investment projects in the city centre, due to amongst other things the competition for the same retailers. Therefore, even if the Pydar Street site cannot be classified as a 'planned investment' under the terms of the NPPF, it does not follow that such an investment will not be affected by an out of centre proposal. Indeed, if this issue is relevant for the West Langarth proposal, it is also certainly relevant for the Football Club application; potentially even more so due to the scale of unrestricted comparison goods floorspace being promoted at this out of centre location. In our view, approval of the Football Club proposal is likely to stop the ability to provide any more than limited comparison goods floorspace at the Pydar Street site due to the likelihood that the Football Club will attract a number of retailers which would have consider that city centre opportunity.
- 6.37 Equally as relevant are our previous observations regarding the impact on existing investment in Truro city centre. As we have noted, confidence in the city centre will be affected by falling turnover levels and direct competition from out of centre unrestricted comparison goods floorspace. The Football Club proposal is substantially larger than the West Langarth proposal which is also considered to be a risk to city centre investment and therefore our previous concerns are intensified. Indeed, the Football Club proposal would provide some 12,545sq m of comparison goods floorspace which is equivalent to one quarter of the total city centre comparison goods retail floorspace stock. This demonstrates the level of competition that the proposed development could pose for the city centre.
- 6.38 Moreover, the Football Club proposal is not the only competing retail scheme for the city centre. There are a number of other commitments for comparison goods retail space in Truro and in other settlements which will increase the pressure of the city

centre in the future. The Football Club will add to this pressure and this likely to be larger than all of these other commitments combined.

- 6.39 As we set out in our analysis of the West Langarth proposal, falling confidence in the city centre could manifest itself in falling investment by businesses and this will be contributory factor in the overall significant adverse impact upon the health of the city centre.
- 6.40 In our view, the Football Club proposal, due to its direct competition with the city centre and the potential to poach retailers from the city centre, is a significant threat to existing investment in Truro city centre.
- 6.41 It should also be noted that a number of objections have been received in relation to the Football Club application from (or on behalf of) existing and potential investors. In particular, Stanhope (the potential investor in the Pydar Street site) has raised significant concerns over this proposal, as have Schroeder's (the owners of the Lemon Quay development). In addition, the Chamber of Commerce, who we would suggest represent existing investors in the city centre, have also objected to this application.

Conclusions

- 6.42 As a consequence of the above, it is our opinion that the Football Club proposal, due to the significance of the impact on Truro city centre, is contrary to saved policies 7A and 7H of the Carrick Local Plan and paragraph 26 of the NPPF. If the Council shares these concerns and agrees with these conclusions then we recommend that the Council considers refusal of this application under policies 7A and 7H of the Local Plan and also paragraph 27 of the NPPF (which directs local planning authorities to refuse applications which are likely to have a significant adverse impact on either the health and/or investment in town centres).

7. Cumulative Impact

Introduction

- 7.1 In June 2014, GVA provided advice to CC in relation to the cumulative impact of approving two out of the three applications which were being determined at that time. See GVA's advice letter attached at Appendix D to this advice report.
- 7.2 The cumulative impact scenarios which were assessed comprised:
- Willow Green Farm & Maiden Green Farm
 - Willow Green Farm & Hendra
 - Maiden Green Farm & Hendra
- 7.3 The reasons for assessing the cumulative impact of only two new supermarkets, rather than three, are set out in the contents of a letter from GVA to CC dated 11th August 2014, contained at Appendix E. In particular, we consider it very unlikely that there is operator demand for the implementation of three new full-line supermarkets¹² on the western side of Truro given that only two of the major grocery operators (ASDA and Morrisons) remain without representation in the Truro area and it is very unlikely that one of the existing incumbents (Sainsburys, Tesco and shortly to include Waitrose) will require a second store in the local area.
- 7.4 Set out below is an updated set out cumulative impact forecasts for these three scenarios, which take into account the updated market share and turnover information gathered for the Retail Study Update.

¹² We understand that there is also demand from discount foodstore operators, such as ALDI and Lidl, for store in the Truro area. However, the provision of such a store does not form part of any of these applications and therefore new or revised proposals will need to be subject to a separate assessment.

- 7.5 In addition, now that the WL and Football Club applications have been submitted, our cumulative assessment will also need to consider these proposals. This is discussed later in this section.
- 7.6 Also, and for the avoidance of doubt, when referring to the combined impact of the proposed developments, as opposed to the wider impact which takes into account the effects of commitment retail floorspace in Truro and elsewhere, we will refer to these impacts as 'solus' impacts. The combined impact of the proposed development, plus commitments, will be referred to as 'cumulative' impacts.

Willow Green Farm & Maiden Green Farm

- 7.7 Within our previous advice, we forecast that the approval (and implementation) of both the Class A1 retail elements of the WGF and MGF proposals would divert £19.0m of retail expenditure away from Truro city centre (see Table 4 at Appendix D). This was predicted to be equivalent to a 5% solus impact upon the retail sector in the city centre, rising to 10% when other commitments were taken into account. Broken down into its constituent parts, this represented 9% solus and 18% cumulative impacts on the convenience goods sector and 4% solus and 10% cumulative impacts on the comparison goods sector.
- 7.8 Our updated assessment of the cumulative impact of the WGF and MGF proposals can be found at Table 20a at Appendix G. Based upon our updated assessment of the turnover of these proposals, along with the update assessment of existing shopping patterns, our updated impact assessment predicts that these proposals would jointly divert some £18.4m of retail expenditure from the city centre. This is equivalent to a 4% solus impact on the city centre's retail sector, rising to 9% when other commitments are taken into account.
- 7.9 Within our June 2014 advice on cumulative issues, contained within the letter at Appendix D, we noted that in relation to the cumulative impact scenarios associated with WGF, MGF and Hendra:

"Whilst the city centre is in good health at present, there is an on-going trend of granting planning permissions for new retail floorspace in the city and in surrounding settlements which is having an increasingly large financial impact on the city centre, particularly in relation to comparison goods shopping. Whilst the Council has given its reasons for granting these schemes, which will provide an expanded range of retail floorspace in other settlements across Cornwall (and in

some instances stop some of the leakage from these settlements), the consequence is that Truro city centre will start to lose market share.

Granting more than one permission in the Threemilestone area will add to this pressure and I consider that a balance will need to be struck between the provision of additional floorspace outside of the city centre (and the choice and competition that this could bring) and the need to protect the health of the city centre”.

and

“The above analysis suggests.....that whilst the available evidence doesn’t show a significant cause for concern, the convenience goods sector is now starting to see large levels of trade diversion and this is in relation to both the one proposal and two proposal scenarios. Therefore, in the same way that the Council will need to consider whether the impact of one new supermarket in Truro is outweighed by the positive impacts of providing a new district centre in Threemilestone, it will also have to consider whether the growing impact on the city centre associated with two new supermarkets is also outweighed by the issues surrounding two separate or adjoining district centre proposals”.

7.10 Within our subsequent advice letter of 11th September 2014, we went on to note that:

[Within our June advice] “The first factor was the cumulative impact of more than one scheme on Truro city centre. The advice concluded that the financial impact on the city centre would increase although it is important to note that a significant adverse impact was not claimed. Instead, we recommended that the Council consider whether the growing impact on the city centre associated with two proposals is outweighed by the issues surrounding two separate or adjoining district centre proposals. On this issue, our advice remains unchanged”.

7.11 Given the similarity between the previous financial impact estimates and the updated estimates in this advice report, we see no reason to divert from this previous advice.

Willow Green Farm & Hendra

7.12 Within our previous advice, we estimated that the combined effect of the WGF and Hendra proposals on the retail sector in Truro city centre would be a negative impact of 4%. This was equivalent to a loss of £15.5m. Broken down into its constituent parts, this comprised an impact of a 9% impact on the convenience sector and a 4% impact on the comparison goods sector. When considered cumulatively with other commitments, the impact on the city centre’s convenience goods sector rose to 18%, whilst the impact on the comparison goods sector rose to 9%. The overall cumulative impact on the city centre in this scenario was 9%.

- 7.13 Our updated cumulative impact assessment for the WGF and Hendra proposals can be found at Table 20b in Appendix G and indicates that the loss of trade from the city centre will be slightly lower, at £14.9m. This comprises a £1.4m trade diversion from the convenience goods sector, leading to an 8% solus and 18% cumulative impact, and a £13.5m diversion from the comparison goods sector, leading to a 3% solus and 8% cumulative impact on the comparison goods sector. Overall, the solus impact of these two schemes on the city centre will be 3%, with a cumulative impact of 9%.
- 7.14 Given the similarity of these impacts to the previous forecasts, our previous advice on cumulative impact, as outlined above, remains applicable for the combined impact of the WGF and Hendra proposals.

Maiden Green Farm & Hendra

- 7.15 Table 6 of our June 2014 advice, attached at Appendix D to this report, outlines our previous cumulative assessment of the MGF and Hendra proposals. It predicted a 4% solus impact on the city centre's retail sector, rising to 9% when the effects of other commitments were taken into account.
- 7.16 Table 20c at Appendix G to this report provides our updated assessment. It predicts that the combined effect of Class A1 retail element of the MGF and Hendra proposals would be a £15.8m trade diversion from the city centre. This, on its own, would be equivalent to a 3% loss of trade in the city centre, which would rise to 9% when other commitments are taken into account.
- 7.17 In line with our updated advice on the other two cumulative impact scenarios, the updated assessment for MGF and Hendra is very similar to our previous (June 2014) advice and, as a consequence, our previous recommendations stand.

Cumulative impact scenarios involving either or both the West Langarth and Football Club proposals

- 7.18 Alongside the need to consider the approval of a combination of the WGF, MGF and Hendra proposals, there may also be the need to consider the approval of one or more of these applications alongside either or both of the West Langarth or Football Club proposals.
- 7.19 With regards to West Langarth, given that it contains a supermarket element which is similar to the supermarket elements of the WGF, MGF and Hendra proposals, it is

important to reiterate our comments made earlier in this section that explain that the delivery of more than one supermarket is unlikely based on current market conditions and the delivery of two new stores should certainly be seen as a maximum. Therefore, when considering the cumulative impact scenarios that involve West Langarth, we would recommend that only one of the WGF, MGF or Hendra proposals should be considered in combination with that scheme. However, there is the argument advanced by the promoters of the West Langarth scheme that only one of the supermarket schemes (i.e. West Langarth) should get approval, thus making this type of cumulative assessment academic.

- 7.20 In any event, given our advice to the Council in relation to the individual (significant adverse) impacts associated with the West Langarth and Football Club schemes, the cumulative impacts of combining either or both of these schemes with one or more of the WGF, MGF and Hendra proposals would further intensify the severity of our predicted impacts on Truro city centre. As such, if the Council agrees with our assessment of the Football Club and West Langarth proposals then there is no need to consider in detail the wider cumulative impacts associated with additional schemes.
- 7.21 However, if this work is required, then this can be completed in order to advise officers and members of the Strategic Planning Committee ('SPC').

8. Summary and Conclusions

Scope and Purpose

8.1 This report has been prepared by GVA for Cornwall Council ('CC') in relation to retail planning policy issues associated with several planning applications in the Truro and Threemilestone area. The applications covered by this report are as follows:

- Willow Green Farm ('WGF').
- Maiden Green Farm ('MGF').
- Land between the A390, the park and ride and Willow Green Farm (to be referred to as 'the Hendra site').
- West Langarth ('WL').
- Truro City Football Club.

8.2 Prior to this report, GVA has already provided advice to CC on the retail planning policy issues associated with the WGF, Hendra and MGF applications. That advice is appended to this report. This report updates and supersedes our previous advice in relation to the impact of these proposals, although our advice on the sequential test is unchanged.

8.3 We set out our conclusions in relation to each application below.

Willow Green Farm

8.4 Our updated impact assessment confirms that the proposed convenience and comparison goods floorspace with the WGF proposal will have an adverse impact upon the health of the city centre. However, due to the nature of the proposal and the level of direct financial impact, we do not consider that it represents a significant adverse impact upon the city centre and therefore it does not conflict with policies in the adopted Local Plan and the NPPF. However, should the Council be minded to grant planning permission for this scheme, we recommend that controls are placed

over the total retail sales floorspace and the types of goods which can be sold from the supermarket within the WGF scheme.

Maiden Green Farm

- 8.5 Our updated impact assessment indicates that little changed since our original advice in relation to the Maiden Green Farm proposal. In particular, we consider that the proposed convenience and comparison goods floorspace within this scheme will not have a significant adverse impact upon the health of Truro city centre, although this conclusion has been reached on the basis of the recommended imposition of controls over the proposed supermarket and other comparison goods floorspace within this scheme.

Hendra

- 8.6 Again, a similar conclusion is drawn for the Hendra proposal – i.e. an adverse impact but, assuming that the Class A retail floorspace is controlled, not a significant adverse impact. As a consequence, we do not consider that, on its own, the Hendra proposal conflicts with impact policies in the NPPF and saved policies in the Local Plan.

West Langarth

- 8.7 The WL proposals needs to be considered against both the sequential and impact tests in the development plan and the NPPF. In relation to the sequential test, we consider that the WL proposal has not demonstrated compliance with the necessary policies and guidance. This is a speculative application, with no indication of the operators for any of the proposed retail units and, whilst there is unlikely to be a suitable alternative site for a supermarket use within or on the edge of Truro city centre, there has not been a robust demonstration of flexibility in terms of scale and format of the remainder of the development. As a consequence, along with the opportunities presented by the Pydar Street area to accommodate comparison good floorspace, we consider that the West Langarth proposal has not satisfied the sequential test in relation to paragraph 24 of the NPPF or policies 7A and 7H of the adopted Local Plan.
- 8.8 Our assessment of the potential impact of the retail element of the WL proposal has found that there is the potential for a significant adverse impact on the health of Truro city centre. Like the WGF, MGF and Hendra proposals, the supermarket element of the

WL proposal will have an adverse impact on the city centre although on its own this is unlikely to have a significant adverse impact. However, the unrestricted nature of the proposed comparison goods floorspace is likely to have a more significant effect upon the city centre, due to the scale of floorspace proposed, the unrestricted nature of the floorspace and the ability to attract retailers away from the city centre. When combined with the supermarket element of the proposed development and existing commitments, the WL proposal is likely, in our opinion, to exhibit a significant adverse impact upon the vitality and viability of the city centre.

- 8.9 This impact could also be accompanied by an adverse impact upon investment within the city centre. The characteristics of the proposed development mean that there is the potential for an adverse impact upon existing investment in the city centre and there is also the potential for an adverse impact upon planned investment, although we appreciate that investment at the Pydar Street site remains at an early stage.
- 8.10 As a consequence of the above, it is our opinion that the WL proposal, due to the significance of the impact on Truro city centre, is contrary to saved policies 7A and 7H of the Carrick Local Plan and paragraph 26 of the NPPF. If the Council shares these concerns and agrees with these conclusions then we recommend that the Council considers refusal of this application under policies 7A and 7H of the Local Plan and also paragraph 27 of the NPPF (which directs local planning authorities to refuse applications which are likely to have a significant adverse impact on either the health and/or investment in town centres).

Truro City Football Club

- 8.11 Given its location and planning policy status, the Football Club application has also been considered against the sequential and impact tests. Having regard to the information submitted by the applicant, we do not consider that the proposed development at the Football Club site has demonstrated compliance with the sequential test. In particular, it is clear from the applicant's own analysis that there is a considerable amount of flexibility in the proposed development, particularly due to the outline and speculative nature of the proposals, along with the lack of named retailers. However, the applicant has not been able to demonstrate to us that the scale and type of retail floorspace cannot be accommodated within the redevelopment of the Pydar Street site in Truro city centre. The Pydar Street site has a history of being promoted for comparison goods retail uses and we understand that both current land

owners are discussing the opportunities for a redevelopment scheme. We consider that Pydar Street offers a suitable alternative and we understand that plans are in place for the Council to vacate the site. There is, in our opinion, considerable potential in this site, although the Council, working with Stanhope and LaSalle Investment Management, will need to demonstrate that it offers a viable development proposition, that a development scheme can be progressed and that site is available within a reasonable period of time. If the Council shares this view and can see opportunities for a development scheme to be progressed then we would recommend that the Council consider refusing the Football Club application on the basis of a conflict with paragraph 24 of the NPPF and policies 7A and 7H of the Local Plan.

- 8.12 We also consider that the Football Club proposal will have a significant adverse impact upon Truro city centre. We have reached this conclusion on the basis of the large direct financial impact of the proposal on the city centre's retail economy, the direct and sustained competition that the development could provide to some of the anchor retail sectors in the city centre and the potential for the development to encourage relocations from the city centre. In addition, there is also the very real potential for the Football Club application to have an adverse impact upon investment within the city centre at the Pydar Street site.
- 8.13 Therefore, we consider that the Football Club proposal, due to the significance of the impact on Truro city centre, is contrary to saved policies 7A and 7H of the Carrick Local Plan and paragraph 26 of the NPPF. If the Council shares these concerns and agrees with these conclusions then we recommend that the Council considers refusal of this application under policies 7A and 7H of the Local Plan and also paragraph 27 of the NPPF (which directs local planning authorities to refuse applications which are likely to have a significant adverse impact on either the health and/or investment in town centres).

Appendix A:

GVA Willow Green Farm advice letter 4th February 2014



Our ref:
Your ref: PA13/10454

4th February 2014

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BY E-MAIL

Dear Tim

Willow Green Farm, Threemilestone, Truro (PA13/10454)

Assessment of Retail Planning Policy

Introduction

Further to your recent instructions, we have now completed our review of the retail land use element of the Willow Green Farm planning application and I write set out in detail our findings.

The retail land use element of this proposal has been considered in the context of the development plan for the area and other material planning policy documents such as the National Planning Policy Framework ('the NPPF'). A summary of the salient parts of these policy documents is contained later in this letter.

In accordance with our instructions from the Council, we have carried out a review of the relevant supporting documentation which has been submitted in support of this application. For the purposes of this advice, three documents have been reviewed:

- o A Retail Assessment prepared by Quod, dated November 2013;
- o A letter from Quod, dated 16th January 2014;; and
- o A letter from Quod dated 28th January 2014.

The January 2014 letters from Quod have been submitted in response to queries and comments we have raised in relation to the original retail assessment and our emerging advice to you on the retail planning policy issues associated with this application. Indeed, this final version of our advice follows (and supersedes) a series of draft advice letters.

Prior to the submission of this application, you will recall that I was engaged in pre-application discussions over the scope of a retail assessment for a combined proposal at Willow Green Farm and Maiden Green Farm. However, these discussions were with another planning consultant (Amethyst) and I had no contact with Quod, the authors of the current retail assessment work for Willow Green Farm.

From the outset it should be noted that the consideration of retail planning policies is one of a number of important elements which are critical to the Council's overall determination of this application. As a consequence, the Council will be required to balance our advice on retail policy matters with other material planning considerations when reaching a decision on this proposal.

The Proposal

The Willow Green Farm proposal is a mixed use proposal, covering a large area of land to the west of Truro and to the north of Threemilestone. The proposed development includes residential, retail, nursing home and pub/restaurant uses. Outline planning permission is sought, although access has not been reserved for future consideration.

The retail element comprises two parts: a Class A1 supermarket and a Class A3/4 public house/restaurant use. The supermarket will extend to 4,700sq net sales and will include 2,800sq m net devoted to the sale of convenience goods and 1,900sq m devoted to the sale of comparison goods. ASDA are the named operator for the proposed supermarket. The pub/restaurant use will extend to 800sq m.

These retail uses are proposed to form part of a 'district centre', which will also include a 700sq m community building. The Quod retail assessment is keen to point out that the proposed 'district centre' accords with an adopted development brief for a large area of land to the north of the A390 in Truro (which includes the Willow Green Farm planning application site). We discuss the contents of the development brief later in this letter although we have concerns that, on their own, these three land uses do not constitute a proper district centre. Neither the NPPF nor the current Practice Guidance on need, impact and the sequential approach possess a definition of district centre and the most recent definition can be found in the (now superseded) PPS4:

District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.

In our opinion, although it provides some of the ingredients, the Willow Green Farm proposal does not fully meet this definition which we consider is a reasonable requirement for district centre status. However, in addition, we make the following observations:

- o The current Willow Green Farm proposal does provide some of the important elements of the requirements of paragraph 6.5 of the adopted development brief, such as the supermarket and pub/restaurant. The elements which we consider

missing are other smaller scale shops, services and small businesses which are generally found in district centres.

- However, we do acknowledge that the Willow Green Farm site could provide part of a new district centre and therefore any 'under provision' in this application could be rectified by additional uses in an adjacent scheme, i.e. Maiden Green Farm.
- The amount of weight to be placed upon the adopted development brief is a matter for the Council and therefore we have approached our assessment on the basis that this is an out of centre retail proposal without any support from an up to date development plan.

Other Proposals

In addition to the current Willow Green Farm application, we also understand that there is an application by Marsh & Baxter Properties and Hendra Ltd for a development on land to the north of the A390 and immediately to the east of the Langarth park and ride facility (hereafter referred to as 'the Hendra application'). This application proposes a Class A1 supermarket, Community Hub (containing Class A3/4, B1, D1/2 uses) and associated development.

We also understand that the Council may be faced with further applications for supermarket development in other parts of Truro and Threemilestone in the near future. We understand that these proposals are located at:

- The current Truro City Football Club site;
- Maiden Green Farm, which is situated to the east of the Willow Green Farm planning application site;
- Ivydene Farm, which lies to the west of Threemilestone and to the south of the A390; and
- Land adjoining the extant Langarth Farm planning permission. Langarth Farm is an area which benefits from a planning permission for large scale mixed use development including residential, a new sports stadium and small scale retail uses.

A plan showing these locations is attached to this letter.

Whilst a detailed assessment of these other proposals is outside of the scope of this advice, these sites are included in our sequential site assessment. In addition, whilst we appreciate that the consideration of these applications (as and when they are all received and registered by the Council) could run within different timeframes, this advice will help the Council determine whether it wishes to make a choice between these out of centre proposals in relation to the sequential approach (on the basis that the Council considers that these out of centre sites are 'competing').

Policy Context

The Development Plan

The development plan for the area comprises saved policies in the Carrick Local Plan. Saved Policy 7G of the Local Plan is relevant to this proposal and notes *inter alia*:

Proposals for supermarket and superstores located outside of the town centres of Falmouth, Penryn and Truro will only be permitted where the needs of the area cannot be accommodated within or adjoining the central shopping areas identified in Policy 7A and where all of the following criteria are met:

(ii) the development would have no significant adverse impact upon the vitality and viability of the centre as a whole when considered on its own or together with any other recent and committed large scale retail developments in the locality;

Where any future changes to the retail character of such developments would threaten the vitality and viability of a town centre shopping area, the district planning authority will seek an obligation under section 106 of the Town and Country Planning Act 1990 to limit the range of goods sold and to restrict future sub-divisions

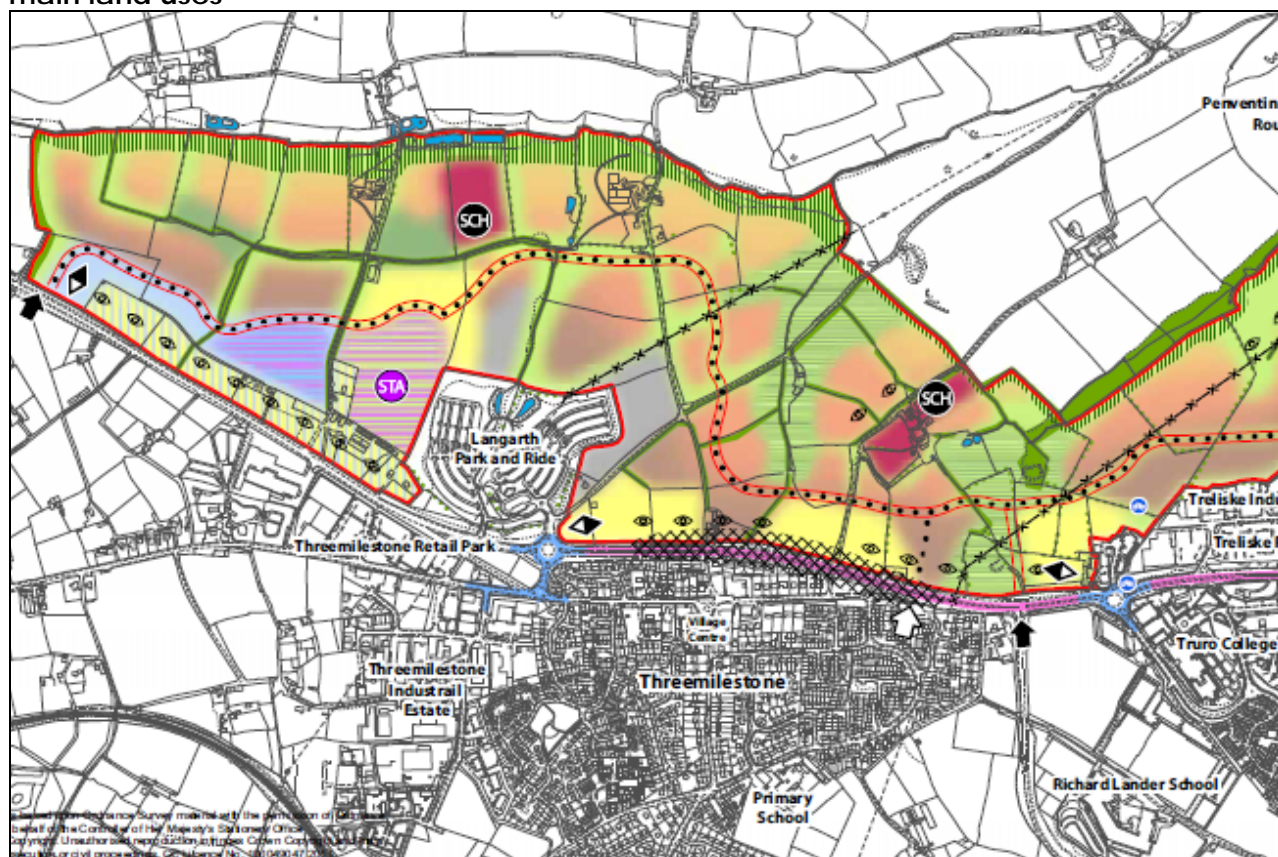
Within the Local Plan proposals map, the application site is not allocated for retail development and is located outside of any defined 'town centres' in the retail hierarchy. Indeed, the only defined 'town centre' in Truro is the city centre.

Other Material Considerations

Given the age of the Local Plan, the contents of Section 2 of the National Planning Policy Framework ('NPPF') will be an important material planning consideration. Given the location and planning policy status of the application site, the NPPF requires that this application is subject to the sequential approach to site selection and is accompanied by an assessment of retail impact. The requirements of these policy tests are set out later in this letter.

In terms of other local planning policy documents, the Council has adopted a development brief for land to the north of the A390, which includes Willow Green Farm. The brief identifies the need for a new district centre and, whilst it explains some of the ingredients required, it does not choose a specific location. Provided below is an extract from the brief, with the areas shaded yellow being the locations for "Mixed use - to include retail provision/ potential locations for District and Local centre and residential". As can be seen, the area for the proposed 'district centre' lies within one of the four main areas shaded yellow.

Extract from Land North of A390 Development Brief – Plan 5: development principles and main land uses



A further material consideration will be the draft Cornwall Local Plan (Strategic Policies), albeit this document has reduced weight as it has not yet been through a formal examination process. Nevertheless, it is important to make reference to the vision and aims for Truro, which include strengthening the city centre. The need for substantial residential development is also outlined in the latest draft of the Local Plan, although there is no specific mention of planned new district centres in the city.

Retail Expenditure Capacity in Truro

Our Cornwall Retail Study, published in 2010, provides the evidence base for retail and town centre planning issues across the County and includes convenience and comparison goods retail capacity forecasts for Truro. Significant additional capacity is identified for comparison goods retailing in Truro, although there is a much smaller capacity for additional convenience goods floorspace.

The retail study forecast the following capacity for convenience goods floorspace in Truro:

- 1,054-1,556sq m net at 2014
- 1,786-2,810sq m net at 2021
- 2,227-3,623sq m net at 2026
- 2,777-4,553sq m net at 2031

Following the decision to approve the Waitrose supermarket and adjacent Taste of Cornwall retail floorspace¹ on the eastern side of the city, these capacity figures reduce to:

- Nil at 2014
- 0-1,000sq m net at 2021
- 400-1,800sq m net at 2026
- 1,000-2,700sq m net at 2031

Therefore, the scale of convenience goods floorspace proposed within the Willow Green Farm application (2,800sq m net) will soak up all of the capacity forecast by the 2010 Retail Study for the period up to 2031 and meet the quantitative need for new floorspace in Truro in the medium to longer term.

Importantly, the test of 'need' no longer forms part of development management policies at the national level and therefore a lack of a shorter term quantitative need to support the scale of supermarket at Willow Green Farm cannot be used as a reason for refusal in its own right. However, need and retail expenditure capacity remain a material consideration for the Council, particularly in relation to the need to choose between competing sites in the sequential approach to site selection and the severity of the impact of new floorspace on existing facilities in Truro.

The Sequential Approach to Site Selection

National and local planning policy requires this proposal to be assessed against the sequential approach to site selection. This test requires 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 and out of centre proposals, national policy indicates that preference should be given to accessible sites that are well connected to the town centre.

Section 4 of the Quod retail assessment deals with the sequential approach and provides an assessment of a large number of in-centre, edge of centre and out of centre sites. Having reviewed the Quod assessment, we can confirm that the same sites were assessed by GVA and Council during consideration of the recent Waitrose/Taste of Cornwall proposals in 2011/2.

¹ Circa 1,800sq m of new convenience net sales floorspace

The Quod assessment adopts an approach whereby alternative sites are assessed against their ability to accommodate all of the uses in the proposed 'district centre'. Quod note that *"each of the elements is critical to the success of the centre and the scheme cannot be disaggregated into individual elements"*. Quod do not provide any supporting justification for this claim, save for the reference to the content of the district centre in the adopted development brief.

The weight to be attached to the development brief is a matter for the Council to decide, although we consider that its lack of formal development plan status means that it cannot be used as a device to avoid proper consideration of the sequential test. In addition, we also do not agree that the Dundee judgement can be used to justify the lack of proper consideration of disaggregation. Clearly, the development brief has a role to play in the wider decision-making process, although it is likely to be a separate issue which counter-balances against the findings of the sequential site selection process and also when comparing proposals within and outside of the development brief area.

For the purposes of this advice, we have concentrated upon the proposed supermarket use, which is the key retail land use element of the scheme. Under the definition of town centre uses in the NPPF, the proposed pub/restaurant could also be subject to the sequential approach and the Council will need to balance this requirement with the benefits of combining this use with the proposed retail floorspace in order to provide further elements of the proposed 'district centre'.

In relation to the sites considered by Quod, these can be summarised as follows:

- City centre:
 - Pydar Street
 - Moorfield car park / former Somerfield unit
 - Pannier market
 - Old bridge street car park
 - Fairmantle Street car park
 - Halfords
 - High Cross car park
 - Garras Wharf
- Edge of centre:
 - TA Hall
- Out of centre:
 - Old County Hall
 - Richard Lander School
 - Truro City FC
 - Newquay Road retail park

As a starting point, it should be noted that all of the in-centre and edge-of-centre sites assessed by Quod were considered (by GVA and the Council) not to be suitable, available and viable alternatives to the Waitrose/Taste of Cornwall supermarket proposal. In addition, the above out of centre sites assessed by Quod were considered (by GVA and the Council) not to be acceptable alternatives to the out of centre Waitrose site.

These conclusions provide an important context for the consideration of the sequential approach for Willow Green Farm, although it will be important to re-consider these sites in response to the individual characteristics of the Willow Green Farm proposal and the factors which may have changed since the completion of our previous advice.

Having re-examined the in-centre and edge-of-centre sites listed above we remain of the opinion, previously given in February 2012, that they do not offer suitable, available and viable alternative locations for the proposed supermarket.

This leads us to concentrate upon alternative out of centre sites in Truro for the sequential assessment. As noted above, the NPPF allows for a preference to be made between different out of centre sites where one of the sites is more accessible and is better connected to a town centre. The need to make a choice between sites will depend upon whether they are seen as 'competing' and this is likely to be based upon the capacity or need for additional retail floorspace and the scale of impact that one or more stores will have on the health of nearby town centres. In this instance, we have already noted that there is likely to be expenditure capacity for only one new supermarket in Truro up to 2031 and this situation suggests to us that the Council may need to make a choice between competing out of centre supermarket proposals in Truro.

In relation to the ability to make a choice between sites, the NPPF is clear that this is based on accessibility and connectivity factors. A recent judgement² also indicates that it is open to a decision maker to decide that two or more sites could be either equally sequentially preferable or ranked in terms of preference based on these factors. Therefore, whilst there may be other reasons to choose between separate proposals, the sequential approach cannot be used as a factor in this choice where there is no material difference between the sites on accessibility and connectivity.

In this instance, we consider that there is sufficient justification for the Council to decide to choose between competing out of centre supermarket/district centre sites in Truro and support one new supermarket. This is supported by the limited amount of retail expenditure capacity for new convenience goods floorspace in Truro and, as will be explained later in this letter, the growing cumulative impact on Truro city centre from retail schemes in Truro and surrounding settlements. If the Council shares this view then the following analysis is designed to help it reach a decision on the sequential approach.

² Telford v Secretary of State for Communities and Local Government (and others), 2013 (n.b. we understand that Telford & Wrekin Council has appealed against the recent High Court decision and this will be heard in the Court of Appeal soon)

In relation to the out of centre sites which need to be considered, the previous list included Old County Hall, the Richard Lander school site, Newquay Road retail park and Truro City FC. We consider that it is appropriate to continue to discount Old County Hall due to its size and availability and, accessibility matters aside, there does not appear to be an opportunity to accommodate a supermarket at Newquay Road retail park. Also, whilst it is clearly large enough to accommodate a supermarket, the Richard Lander school is now unlikely to be available for retail development as it is being promoted for residential development.

Truro City FC had been dismissed in our previous assessment although recent information indicates that the site may now be available for redevelopment and therefore it should be re-examined for this application. In addition, we are aware of other current/forthcoming planning applications for supermarket/retail development in the following locations:

- The Hendra site
- Maiden Green Farm
- Ivydene Farm
- Land to the north of the A390, to the east of the Park & Ride site (also known as the 'Hendra site')
- Langarth Farm

These sites, shown on the plan attached to this advice, should also be included in the sequential assessment exercise.

As set out above, these six sites should be compared in relation to their accessibility and connectivity to nearby town centres. In relation to the consideration of accessibility, the full extent of this assessment is outside of our remit and we recommend that the Council reaches its own view on the accessibility of the Willow Green Farm site in comparison to the out of centre sites.

In relation to connectivity with nearby town centres, the attached plan indicates the location of Truro city centre, existing supermarkets and the six out of centre sites being considered as part of this sequential assessment. The plan shows that the Truro City FC site is the closest to Truro city centre although the distance from this site to the centre is over 900 metres. Based upon this distance, the lack of inter-visibility between the two locations and the indirect route, we do not consider that many linked trips will occur. Therefore, whilst it is closer to the city centre than the other sites (the next closest is Maiden Green Farm at 3.5km), we do not consider it reasonable to give preference to the Truro City FC site based on connectivity.

The remaining five sites are grouped closer together either to the north of Threemilestone (Willow Green, Langarth Farm, Maiden Green and Hendra) or to the west of Threemilestone (Ivydene Farm). In terms of their respective distances and physical connection with the city centre, we do not consider it reasonable to single out one of these sites above the others.

However, in support of the current application at the Hendra site, the applicant suggests that proximity to the park and ride facility does improve connectivity with the city centre. This factor could fall into either the 'accessibility' or 'connectivity' assessments, and Council officers will need to determine whether: (A) the physical relationship between the Hendra site and the park and ride site will encourage more trips by public transport than the other sites; and (B) whether there is better public transport accessibility via the park and ride site than the public transport services in the vicinity of the other out of centre sites. Whilst the final view will rest with Council officers, our view is that the relationship of the Hendra site to the park and ride facility does not give it sequential advantage over the Willow Green Farm site. We reach this conclusion on the basis of the physical relationship and linkages between the Hendra proposal and the park and ride site and the likelihood that the Willow Green Farm supermarket will be located in close proximity to bus stops.

In their Planning & Retail Statement, the applicants for the Hendra site also argue that their site should be preferred in terms of accessibility due to the proximity to local shops and services in Threemilestone. It is argued that, whilst not a formal 'local centre', this area has the characteristics of one and therefore its connectivity with the Hendra site should be explored.

In our view, the proper forum for consideration of Threemilestone as a defined local centre should be through the development plan preparation process and the clear starting point for consideration of this application is that it is not a defined centre. Therefore, the perceived connectivity from potential development sites to this area is not a matter for the proper application of the sequential approach.

Notwithstanding this view, we have compared the linkages between the Hendra and Willow Green Farm sites to these shops and services. Importantly, linkages between both of these sites require the need to cross the A390. The A390 presents a large barrier to north-south movement and, in order to assist this movement, new pedestrian cross facilities will be required. We understand that the Willow Green Farm application proposes two crossings: one close to the location of the proposed supermarket and another close to the south-eastern corner of the Hendra site. The current Hendra application also proposes a new crossing close to the south-western corner that that site, which would be close to a bridleway which connects the A390 to the area of shops and services. We understand that all of these proposed crossings would be signal-controlled.

Whilst the location (and quality) of these crossing points can be set for the Willow Green application, it should be noted that layout is a reserved matter for both the Hendra and Willow Green Farm applications and access is also a reserved matter for the Hendra scheme³. Therefore, precise distance measurements between the supermarket entrances and locations within the customer car parking areas and the shops/services in Threemilestone cannot be set. However, it is possible that the walking distance from the

³ Access is not a reserved matter for the Willow Green Farm scheme.

Hendra site may be shorter than the Willow Green Farm site and there is a need to consider whether this (potentially) short distance is significant in the context of 'connectivity'. In our view, the key influence over connectivity is the A390, with a decision to cross this road a much more important factor in the strength of linkages than a relatively small difference in walking distances. Therefore, with both the Willow Green Farm and Hendra sites on the opposite side of the A390, we do not consider that there is a material difference between these two sites in terms of connectivity with the small collection of shops and services in Threemilestone.

As a consequence, and having regard to the above analysis in relation to connectivity, we do not consider that the Willow Green Farm site is sequentially inferior to any of the other five out of centre sites in Truro. However, by the same token, it is not necessarily sequentially superior to some of these sites. In relation to accessibility, this is a wider matter for the Council to consider, but if a similar conclusion to connectivity is reached, then the Council is able to conclude that the Willow Green Farm site does not fail the sequential approach to site selection and other factors will need to be considered if a choice is to be made between competing proposals.

Impact

The NPPF impact test is split into two parts: impact on investment and impact on town centre vitality and viability. The various documents from Quod have provided an assessment of both tests and we review the information provided in turn below.

Impact on Investment in Truro City Centre

As Quod point out in Section 5 of their retail assessment, the officer's report in relation to the recent Waitrose/Taste of Cornwall proposal concluded that that scheme would not have a detrimental impact on investment. In our view, very little has changed in the intervening period to warrant a change in this view.

In particular, we are not aware of any supermarket/convenience goods floorspace proposals in the city centre and we are not aware of any on-going interest from grocery operators in occupying the former Somerfield unit. In addition, assuming it's controlled by condition, the scale of comparison goods floorspace within the proposed supermarket is unlikely on its own to significantly affect the on-going efforts to bring forward a comparison goods-led retail redevelopment scheme at Pydar Street.

Therefore, based upon the impact associated with the Willow Green Farm application, we do not consider that there is evidence to show that planned investment in Truro city centre will be affected.

In relation to existing investment, there is a need to consider whether existing city centre occupiers and property owners in the city centre will alter their investment as a consequence of the proposed development. Change would occur, for example, where retail store viability/profitability is affected or out of centre competition is becoming more

severe. In this instance, and with reference to our assessment of impact later in this advice letter, it is clear that both the convenience and comparison goods sectors in the city centre are coming under increasing pressure from retail development proposals in Truro and surrounding settlements. We consider that the provision of two new supermarkets in Truro is unlikely to fundamentally affect investment decisions, although the scale of impact is likely to start to raise questionmarks over whether there is an economic benefit in further investment. This view is supported by the assessment of existing store trading conditions and our retail expenditure capacity assessment.

Impact on Truro City Centre Vitality and Viability

In order to judge the overall impact of the proposed supermarket on the health of Truro city centre, it is necessary to consider a number of factors, including the financial impact of the proposal on the convenience and comparison goods sectors in the centre, the current health and trading performance of the centre, the likely extent of trading overlap between these shopping destinations, the cumulative impact of other retail proposals in Truro and elsewhere and, finally, the potential for the proposal to provide any linked trips or spin-off benefits for the city centre.

A key part of the impact assessment is the calculation of the likely financial impact on Truro city centre. The Quod assessment is based on the following:

- Use of a study area for the assessment which includes Zones 1-17 and 22 of the Cornwall Retail Study;
- Use of the 2008 household survey used to inform the 2010 Cornwall Retail Study;
- Use of new population and retail expenditure data from Experian;
- Use of new sales density data for existing stores and centres in the study area;
- Calculation of the solus impact of the proposed supermarket, plus the cumulative impact of the proposal with other commitments and recent proposals in Cornwall.

Starting with the expenditure and population data, we have chosen the Truro zone (Zone 10) and obtained our own data from Experian to check the robustness of the data used by Quod. The data we have obtained from Experian indicates that the base population data in Quod's 16th January 2014 letter is correct, although it is unclear whether the future projections adopted by Quod are consistent with the Council's own forecasts underpinning the emerging Local Plan.

However, the expenditure data in the 16th January Quod letter give cause for some concern. The 2011 per capita expenditure data for convenience goods provided by Experian is £2,020 in 2011 prices. A very similar figure appears in the Quod assessment for Zone 10 (£2,021) although Quod suggest that this is in 2007 prices. The £2,020 figure provided to us by Experian, when converted to 2007 prices, changes to £1,622. Therefore, we have already raised concern that the data in the 16th January Quod assessment is not being shown in 2007 prices. The 28th January letter from Quod confirms that there was an error in the 16th January assessment and, as a consequence, a further assessment has been provided which incorporates data in 2007 prices. This latest assessment lowers the

amount of available expenditure within the study area and, as a consequence, store/centre turnover levels for convenience goods expenditure.

In previous correspondence, we have also raised concerns over the use of the 2008 household survey which was originally commissioned to inform the 2010 Cornwall Retail Study. The response from Quod in their 16th January and 28th January letters is dismissive, noting that there has been little change in retail provision in the local area in the past five years and GVA and the Council relied on the 2008 survey when reaching their conclusions on the recent Waitrose application.

In our view, the 2008 survey data is becoming dated, not least because it surveyed shopping patterns prior to the closure of the Somerfield store in the city centre and the extension of the out of centre Sainsburys supermarket. Therefore, for the Council to make important development management decisions on this supermarket proposal, along with other forthcoming proposals in Truro, using the 2008 survey could be open to challenge. Given the reluctance of Quod to commission a new survey, we have no choice to provide our advice to the Council based on the 2008 survey analysis, but raise concern that the advice is not based on up to date shopping patterns data.

In addition, whilst the former Somerfield store is included in the Quod market share analysis, given that it featured as part of the 2008 survey, it remains in the analysis at 2019 even though £1m of its turnover has been redistributed to 'other' convenience goods stores in Truro city centre.

Moving on to the assessment of impact, Quod provide separate convenience and comparison goods assessments and provide separate impact estimates for the proposed supermarket and other committed/proposed development in Truro and in surrounding settlements.

We are satisfied that all of the salient commitments in the wider area have been included in the latest (28th January 2014) Quod assessment, which now includes the Sainsburys in Falmouth and the Tesco extension in St Austell. There is also a commitment for retail floorspace in Truro, at Oak Tree Inn, which is missing from the Quod assessment, although this is limited to bulky goods and is unlikely to have a material change on the cumulative impact on the city centre.

We have examined the convenience goods trade diversion estimates that Quod have provided in relation to the commitments and have the following comments:

- We agree with Quod that the likely impact of convenience goods floorspace commitments outside of Truro is likely to be minimal on the city centre;
- We consider that Quod's estimated trading impact of the committed Waitrose/Taste of Cornwall stores on the city centre has been under-estimated. In their 16th January assessment, a diversion of £0.2m was suggested. Whilst the 28th January assessment increases this to £1.0m, it is still lower than our own assessment

(for the Council) for that development which suggests up to £1.7m will be lost from the city centre.

We also have the following comments on Quod's comparison goods trade diversion estimates for the commitments:

- o Quod has responded positively to our request and their latest (28th January) assessment now includes the impact of the committed Tesco extension in St Austell on Truro city centre;
- o On the basis of all three schemes coming forward, we broadly agree with the amount of trade which will be diverted to the new retail proposals in Newquay⁴, although we consider that Quod slightly under-estimate the diversion to the Growth Area and Treloggan Road schemes.

Turning to Quod's assessment of the trading impact of the proposed supermarket, we have reviewed the change in predicted turnover for the store and make the following observations:

- o Following the submission of the original retail assessment, Quod has applied a much lower sales density for ASDA in its 16th January and 28th January 2014 impact assessments. The new lower density results in a reduction of circa £10m in convenience goods turnover. Whilst a sales density expressed in 2007 prices will be lower than expressed in current prices, Quod have claimed to use a consistent 2007 price base in all of their assessment and, in any event, this new (lower) sales density is not supported by evidence.
- o In addition, in a change from its original assessment, Quod's 16th January and 28th January impact assessments apply a £4.7m 'discount' in turnover to the convenience goods turnover of the ASDA store. This discount is made on the basis of the contribution of residents in the new housing areas at Threemilestone to the annual turnover of the proposed store. The Quod assessment includes an assessment of population growth in Truro and the surrounding area but, in a conversation with Tom Vernon of Quod on 29th January 2014, it has been claimed that Experian's forecasts population growth does not include any allowance for the effect of housing development at Threemilestone. On this basis, Quod assume that the retail expenditure generated by new housing developments in this area is in addition to the data contained in the Quod assessment and Quod assume that 50% of all convenience goods expenditure generated by these residents will be spent at the ASDA store. We are concerned that Quod's assumptions regarding population growth forecasts are not supported by reference to Cornwall Council's own data and, as a consequence, we are concerned that an element of 'double counting' may be being utilised. In addition, we are also concerned over the

⁴ Duchy of Cornwall Growth Area, Treloggan Road and Kingsley mixed use scheme

robustness of the unsupported assumption that half of all convenience goods expenditure of new Threemilestone residents will be spent at the ASDA store.

Following a review of their 16th January letter, we expressed concern to Quod over the pattern of convenience goods trade diversion shown in that letter. In particular, whilst Truro does have a wide catchment area, drawing shopping trips from other settlements, and the proposed store is a large store, we had a concern that the 16th January assessment was unreasonable to suggest that the level of diversion from other large stores in Pool, Camborne, Redruth, Penryn and Newquay will be higher than diversion of expenditure from Truro stores. It is our opinion that there will be much higher level of diversion from within Truro, particularly the Tesco and Sainsburys stores, although the city centre will also feel a higher impact.

Quod's 28th January letter has responded by changing the pattern of expenditure diversion from stores in the surrounding area. The change in approach is shown in Table A below and it can be seen that the balance of diversion is now greater for Truro.

Table A: comparison between 16th January and 28th January 2014 trade diversion assessments submitted by Quod

Store / Centre	16 th January Quod Assessment	28 th January Quod Assessment
Tesco, Truro	£2.7m	£5.2m
Sainsburys, Truro	£4.2m	£6.0m
Aldi, Truro	£0.4m	£0.4m
Truro city centre	£0.4m	£0.4m
Waitrose commitment, Truro	£1.3m	£1.3m
Newquay	£0.7m	£0.5m
St Austell	£0.5m	£0.3m
Camborne	£1.0m	£0.8m
Pool	£4.2m	£2.5m
Redruth	£1.7m	£1.4m
ASDA, Penryn	£4.3m	£2.6m
Other stores in Falmouth & Penryn	£0.4m	£0.4m
Helston	£1.1m	£1.1m
Hayle	£0.4m	£0.4m
Diversion from Truro	£9m	£13.2m
Diversion from stores outside of Truro	£14m	£9.9m

However, even with these recent changes, we remain of the view that Quod's assessment continues to assume too high a level of diversion from non-Truro stores. Whilst we agree that, due to its wide catchment for shopping and employment, Truro will draw trade from a wide area, it is unrealistic to assume that circa 40% of the ASDA's trade will come from stores in other settlements. Instead, there will be a greater redistribution of trade from stores in Truro.

In order to test this view, we have undertaken our own assessment which examines the shopping patterns observed by the 2008 household survey, the changes and planning permissions which have occurred since completion of the survey, the retail offer of the proposed store and the retail offer and location of competing facilities.

For the purposes of this assessment, we have used the turnover figures for existing stores provided in the 28th January Quod assessment, along with a re-distribution of the Somerfield turnover to other (remaining) town centre convenience goods stores. However, as we have already indicated, a note of caution must be struck over the robustness of the Quod data and therefore our own assessment must be accompanied with a warning over the quality of the base data that it relies upon.

For our assessment of convenience goods impact, we have taken into account the predicted impacts associated with the Waitrose/Taste of Cornwall commitment and then considered the likelihood of further trade diversion beyond the impacts of that commitment. In other words, the proposed supermarket at Willow Green Farm would be introduced into a retail sector that has three supermarkets rather than the current two and this will have an influence on the level of trade diversion which will occur from the city centre.

Our predicted levels of convenience goods expenditure diversion from the city centre are set out in Table B below.

Table B: Trade diversion from convenience goods stores in Truro city centre, 2019

City Centre Facility	Pre-Impact Total Turnover, 2019 (£m)	Trade Diversion to Waitrose/Taste of Cornwall (£m)	Trade Diversion to Willow Green Farm (£m)	Solus Impact of Willow Green Farm	Cumulative Impact
Marks & Spencer	£4.4m	£0.4m	£0.3m	-7%	-15%
Co-op	£6.0m	£0.9m	£0.3m	-7%	-21%
Iceland	£1.6m	£0.1m	£0.1m	-4%	-8%
Other	£5.2m	£0.4m	£0.3m	-7%	-14%

As can be seen from Table B, the Willow Green Farm supermarket will have a further impact upon convenience goods stores in the town centre although the financial level of impact will be smaller than the Waitrose/Taste of Cornwall proposal as the increasing amount of out of centre supermarkets in Truro compete against each other. The impact of the Waitrose scheme is predicted to be 10% on the city centre's convenience goods sector and our advice to the Council on this scheme noted:

Overall, these levels of impact do not suggest a significant adverse impact upon the city centre's retail economy and we do not predict the closure of any of the larger foodstores (Marks & Spencer, Iceland and Co-op) on the basis of the proposed Waitrose and Cornish Food Hall units. However, it should be remembered that this is the impact of the proposed Waitrose/Cornish Food Hall development alone and does not imply that the impact of other retail proposals in Truro in the future will be acceptable, as they may have a larger cumulative impact (particularly where there is the absence of additional surplus retail expenditure after this development).

The Willow Green Farm proposal will have a further 7% impact upon the turnover of city centre convenience goods stores⁵, leading to an overall 16% cumulative impact from both schemes. Based upon the 2008 survey results, the Marks & Spencer foodhall and Iceland stores are undertrading (against company average levels) whilst the Co-op store trades above average. It is difficult to foresee a situation whereby the Marks & Spencer foodhall or the Co-op store close or down-size, although we hold the view that the convenience goods sector as a whole will come under increasing adverse pressure as the out of centre supermarket sector in Truro grows even further.

⁵ Based on the post-Waitrose impact city centre turnover

GOAD data from September 2012 suggests that the proportion of convenience goods uses and floorspace in Truro city centre are below the national average⁶. Different views can be taken over this data, with one view being that the convenience goods sector matters less to the overall health of Truro city centre, whilst an opposing view maybe that its small size indicates that it is in need of support in order to continue to provide variety in the retail offer in the city centre. We hold the latter view and, whilst there is unlikely significant change in the convenience goods sector, there is the potential for a downwards trend in the financial performance of the city centre's convenience goods sector.

In relation to comparison goods impact, the 16th January letter from Quod indicates that £11.5m of expenditure would be diverted from stores in Truro. With a total turnover of £17.2m for the ASDA store, Quod were therefore assuming that £5.7m (or one third) of the store's comparison goods turnover would be diverted from stores outside of Truro.

In their latest assessment, Quod continue with the assumption that £5.7m of expenditure will be diverted from non-Truro stores and clarify that £5.8m (i.e. half) of the £11.5m of expenditure diverted from Truro stores will be diverted from the city centre. Whilst it is useful for the latest Quod assessment to clarify their predicted diversion from the city centre, we do not agree that the city centre will contribute a similar amount of trade to the proposed store than stores outside of Truro. Neither do we agree that the split in trade diversion between in-centre and out of centre stores in Truro will be 50/50.

Having regard to the size of the proposed comparison goods floorspace and the location/scale of competing stores in Truro and the wider area, it is our view that £11.2m of comparison goods expenditure will be diverted from the city centre. This estimate takes into account the trading overlap between the proposed ASDA and the city centre, whilst acknowledging that there will be additional diversion from other supermarkets and retail warehousing in Truro (circa £5m) and diversion from other settlements (circa £1m).

Based upon a turnover of £528m, this equates to an impact of 2%. It is unclear how Quod have arrived at the £528m figure in terms of market share, as the Cornwall Retail Study provided one market share for Truro as a whole and did not break down the turnover level into city centre and out of centre floorspace. If Quod have used the Retail Study market shares, then the £528m turnover figure is for Truro as a whole and not just the city centre and a reduction needs to be applied in order to gain a more accurate city centre impact assessment.

Without an accurate up to date shoppers survey information, any reduction in the total Truro turnover figure will be based upon judgement. However, if 20% (circa £100m) of comparison goods expenditure is assumed to flow to out of centre stores, then the impact of the Willow Green Farm supermarket will be 3% on the city centre and contribute to an overall 8% cumulative impact for comparison goods.

⁶ 5.4% of units in Truro against a national average of 8.8% and 11.7% of floorspace in Truro against a national average of 17.8%

On its own, an impact of 2%-3% from Willow Green Farm may not be seen as a significant adverse impact in its own right. However, it is part of a growing impact on Truro caused by the approval of retail schemes in surrounding settlements. The approval of schemes such as the Kingsley and Treloggan Road proposals in Newquay is seen by the Council as benefitting Newquay residents as it will enable shorter shopping trips and reduce leakage of retail expenditure to Truro. This obviously has a negative impact on the successful performance of Truro city centre, which is then further compounded by the impact of new out of centre floorspace in Truro such as Willow Green Farm. This situation requires a balancing exercise from the Council, balancing the perceived benefits to other settlements against the impact on Truro, leading to a reduction in its market share. Whilst a cumulative impact of 8% does not lead us to the conclusion that there is a significant cause for concern, large comparison goods areas in out of centre supermarkets in Truro do pose direct competition for the city centre.

Attached to this letter is our overall financial impact assessment for the Willow Green Farm supermarket. Taking into account the convenience and comparison goods impacts outlined above, it is our view that the Willow Green Farm supermarket will have a 3% impact on the retail sector in Truro city centre by 2019. This is based on a diversion of £12.2m of retail expenditure from the city centre economy.

Taken together with other committed developments in Truro and elsewhere, the city centre retail economy will lose 9% of its future (2019) turnover, which is equivalent to a reduction of £37.4m. Importantly, it should be noted that the Willow Green Farm proposal is equivalent to one third of this wider cumulative impact.

In terms of the consequences for this level of impact, there are a number of factors to consider. First, the removal of £12.2m of retail expenditure from the city centre economy, primarily the comparison goods sector, is a clear negative adverse impact of the proposed development. This impact is part of a growing financial impact on the city centre, which could reach almost 10% of annual turnover when other schemes are considered.

Added to this impact is the competition posed by the proposed development. Both the convenience and comparison land use sectors in the city centre will be affected, although we appreciate that there will be some differentiation for the convenience goods sector, which has more of a top-up food shopping role, and the scale of competition with the comparison goods sector can also be controlled if conditions are applied to any permission granted by the Council.

There are also unlikely to be any spin-off benefits for the city centre associated with the Willow Green Farm scheme. It is too far away from the city centre to encourage walking linked trips, although the scale of retail offer in the city centre is such that it will continue to attract shopping trips notwithstanding the Willow Green proposal even if they made on separate occasions.

Taking all of these factors into account, it is our conclusion that the retail element of the Willow Green Farm proposal will have an adverse impact upon the health of Truro city centre but its contribution to the wider cumulative impact on the centre is unlikely to be significantly adverse. In reaching this conclusion we have taken into account the following factors:

- The current good health of the city centre;
- its catchment area and trading profile;
- the likelihood that this proposal will not lead to significant closure of stores in the city centre;
- the likelihood that the proposed development will not lead to relocations from the city centre;
- whilst there is direct competition, the level of competition is at a manageable level (subject to conditions); and
- the proportion of the cumulative impact which is attributable to this proposal.

However, in order to control this impact, we strongly recommend that the Council, if it decides to grant outline planning permission for this proposal, to impose conditions on the approved retail floorspace which limit the amount of total net sales floorspace and the amount of this floorspace which can be devoted to the sale of convenience and comparison goods.

Moreover, these conclusions apply to the Willow Green Farm scheme alone and should not be assumed to apply to other supermarket and retail proposals in Truro which may come forward in the future. We recommend that the impact of each scheme is assessed separately and that scenarios which test the impact of approving more than one proposal are accompanied by an updated cumulative impact assessment.

Summary and Conclusions

Given the location and planning policy status of Willow Green farm site, our advice to the Council has concentrated upon the compliance of the proposed retail floorspace with the sequential approach to site selection and the scale of impact of the retail floorspace on the health of Truro city centre.

In relation to the sequential approach, we consider that the applicant has not been flexible enough in the assessment of alternative sites and, whatever weight is placed by the Council on the development brief, an assessment should be undertaken which disaggregates the proposed main town centre uses and considers whether they can be placed on more central and accessible sites. However, we have undertaken an assessment of alternative locations for the proposed supermarket use and have concluded that there are no any in-centre or edge-of-centre sites which can accommodate this use. This conclusion is consistent with our recent advice to the Council in relation to the Waitrose/Taste of Cornwall proposal.

However, there is also a need to consider whether there are any alternative out of centre sites which are more accessible and/or better connected to a town centre than the Willow Green Farm site. The locations which we have considered are: Truro City FC; Maiden Green Farm; Ivydene Farm; Land to the north of the A390 and east of the Park & Ride facility; and, Langanth Farm. In terms of connectivity to defined town centres, we do not consider that the Willow Green Farm site is out-performed by any other location although, by the same token, there is also no evidence to demonstrate that Willow Green Farm is materially better in terms of connectivity than these sites.

In relation to accessibility, this is a wider matter for the Council to consider, but if a similar conclusion to connectivity is reached, then the Council is able to conclude that the Willow Green Farm site does not fail the sequential approach to site selection and other factors will need to be considered if a choice is to be made between competing proposals.

In relation to the need to make a choice between out of centre supermarket proposals in Truro, the assessment of quantitative need in the 2010 Cornwall Retail Study for additional convenience goods floorspace in Truro suggests that, in addition to the Waitrose/Taste of Cornwall commitment, there is likely to be expenditure capacity for one new supermarket in Truro up to 2031. This suggests that the Council may wish to make a choice between the Willow Green Farm and other current/forthcoming proposals for supermarkets in Truro.

In relation to the impact of the proposed supermarket, we have undertaken a thorough assessment of the information provided by the applicant and have identified some concerns regarding the quality of the data used and the predictions in relation to trade diversion to the proposed supermarket. Therefore, we have undertaken our own impact assessment and have concluded that the proposed supermarket will have the following financial impacts on Truro city centre:

- a solus 7% impact on the convenience goods sector, with a cumulative impact of 16%;
- a solus 3% impact on the comparison goods sector, with a cumulative impact of 8% impact;
- a total solus retail impact of 3%, which rises to 9% when other commitments are taken into account.

In deciding how these impacts will affect the health of Truro city centre we have taken into account the fact that the city centre is in a good state of health and is not reliant on convenience goods expenditure to maintain its role and status, albeit that convenience goods expenditure does contribute to an important mix of uses in the centre. We have also taken into account the potential trading overlap between the proposed supermarket and the city centre and have found that there will be some overlap, particularly in relation to comparison goods shopping, not least due to the size of the store. As part of our assessment we have also noted that the proposed supermarket is unlikely to provide spin-off benefits for the city centre. Finally, we have given weight to the likelihood that the Willow Green Farm proposal will have a larger impact on the city

centre than the Waitrose/Taste of Cornwall proposal and will contribute to a growing cumulative impact on the city centre, albeit that Willow Green Farm is a minority part of this total impact.

Taking all of these factors into account, it is our conclusion that the retail element of the Willow Green Farm proposal will have an adverse impact upon the health of Truro city centre but its contribution to the wider cumulative impact on the centre is unlikely to be significantly adverse.

Therefore, to control the impact of the proposed retail floorspace, we recommend that the Council, if it decides to grant outline planning permission, to impose conditions on the approved retail floorspace which limit the amount of total net sales floorspace and the amount of this floorspace which can be devoted to the sale of convenience and comparison goods.

I trust that the contents of this letter provide you with sufficient information and advice. However, if you have any queries, or require additional information, please do not hesitate to contact me.

Yours sincerely



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

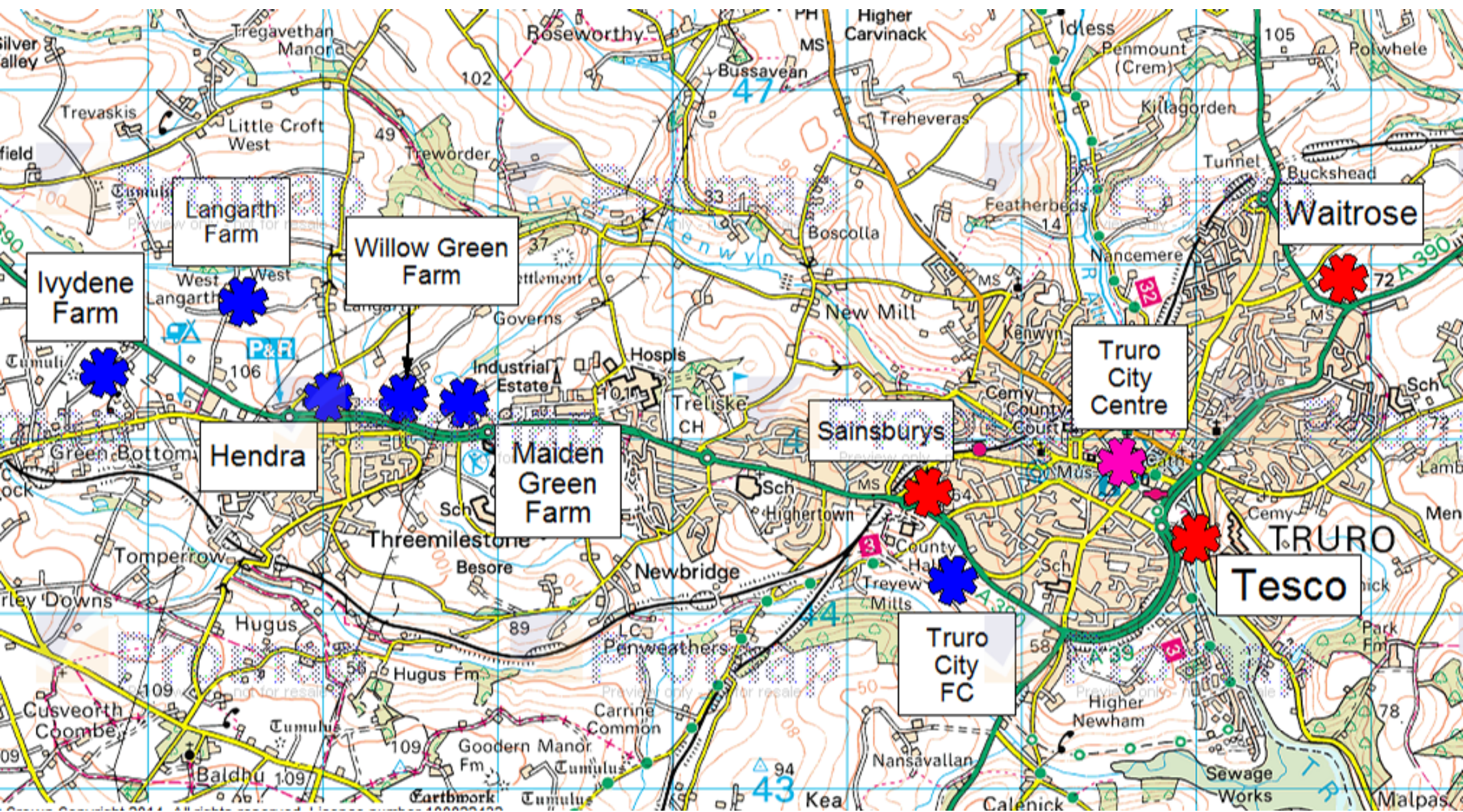
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TABLE 1: TOTAL RETAIL IMPACT OF WILLOW GREEN FARM SUPERMARKET ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to Willow Green Farm	Residual Turnover	Solus Impact of Willow Green Farm	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.0	£14.4	-7%	-16%
Comparison	£422.5	£23.5	£399.0	-6%	£11.2	£387.8	-3%	-8%
Total	£439.6	£25.2	£414.4	-6%	£12.2	£402.2	-3%	-9%

Notes:

- convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
- comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
- diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
- diversion to Willow Green Farm based on GVA assessment



Appendix B:

GVA Maiden Green Farm advice letter 2nd May 2014



Our ref:
Your ref:

2nd May 2014

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BY E-MAIL

Dear Tim

Maiden Green Farm, Threemilestone, Truro (PA14/00703)

Assessment of Retail Planning Policy

Introduction

Further to your recent instructions, we have now completed our review of the retail land use elements of the above planning application at Maiden Green Farm ('MGF'). Like our advice on the current planning application at Willow Green Farm ('WGF'), the retail land use element of the MGF application has been considered in the context of the development plan for the area and other material planning policy considerations such as the National Planning Policy Framework ('NPPF') and the National Planning Practice Guidance ('NPPG').

In accordance with our instructions from the Council, we have reviewed the relevant documentation submitted in support of this application. The focus for our review has been a Retail Assessment, prepared by Amethyst Planning, dated December 2013.

At present, the application at MGF is one of three current applications for large-scale retail development in Threemilestone. The other two applications are at WGF and land to the north of the A390 (which we will refer to as 'the Hendra site'). We have already provided the Council with advice in relation to the mixed use development proposals at nearby WGF, in a letter dated 4th February 2014. Given that the WGF advice was issued before the publication of the NPPG, we will shortly issue further supplementary advice to the Council. In addition, we will shortly provide the Council with our advice on the Hendra application.

The Proposed Development

The hybrid planning application¹ at MGF proposes a mixture of land uses, including a proposed 'district centre' which has the following components:

- o Supermarket – 3,958sq m net
- o Class A1 non-food uses – 1,995sq m net
- o Health/medical/pharmacy use – 1,421sq m gross
- o Nursery/crèche – 240sq m gross
- o Community space – 240sq m gross
- o Public house/restaurant – 484sq m gross
- o Café/bar/restaurant – 677sq m gross
- o Convenience goods Class A1 retail unit – 120sq m net.

The proposed supermarket will have a net sales area of 3,958sq m, comprising 2,980sq m for the sale of convenience goods and 978sq m for the sale of comparison goods. There is no named operator for the supermarket unit.

In addition to the supermarket, a further 1,995sq m (net sales area) of comparison goods floorspace is proposed. Given the outline nature of this application, there are no specific proposals for the number and size of the comparison goods units. A similar comment can also be made in relation to the other Class A uses proposed for the district centre.

The applicant has submitted an illustrative masterplan and we provide an extract below which shows the district centre uses.

¹ Details of proposed access arrangements, but all proposed land uses in outline

Figure 1: extract from illustrative layout plan for Maiden Green Farm



- | | |
|------------|---|
| 3a. | District centre - retail |
| 3b. | District centre - supermarket |
| 3c. | District centre - petrol filling centre |
| 3d. | District centre - health centre |
| 3e. | District centre - creche and community hall |
| 3f. | District centre - hotel |

Like the WGF application, the MGF proposal is keen to promote the above uses as a district centre which is accordance with the adopted development brief for land to the north of the A390 at Threemilestone. The salient contents of the development brief are outlined in our 4th February 2014 advice letter, although it is useful to summarise that the development brief identifies a need for a new district centre and, whilst it explains some of the ingredients required, does not choose a specific location. Instead four areas are shown on a plan and it will be for the Council to determine whether the MGF application is in accordance with one of these areas.

Amethyst Planning provide a useful table at page 7 of their Retail Assessment which outlines how they consider the MGF application responds to the requirements for the district centre (which are listed in paragraph 6.5 of the development brief). In its December 2013 submission, Amethyst allege that the MGF proposal provides for all the

ingredients required by the development, however we have undertaken our own analysis below and have included the content of the WGF and Hendra applications for comparative purposes.

Table A: comparison between the component parts of the Maiden Green Farm, Willow Green Farm and Hendra 'district centre' proposals

District Centre Component	Willow Green Farm	Maiden Green Farm	Hendra
New retail floorspace, including a single medium sized foodstore	Foodstore only, no additional A1 retail floorspace	Foodstore and additional convenience/comparison goods floorspace	Foodstore only, no additional A1 retail floorspace
Community use	Yes	Yes	Yes
Doctors surgery/health centre	No	Yes	No
Public house/restaurant	Yes	No specific public house ² , but separate restaurant facilities are provided (see below)	Yes
Children's nursery	No	Yes	Yes
Parking for mobile library unit	Unclear from submitted application, partially due to its outline nature	Shown on indicative layout plan	Shown on indicative layout plan
Accommodation for small businesses and services to complement the main uses	No other proposed uses in WGF district centre	Café/bar/restaurant uses proposed within MGF district centre	Café/bar/restaurant uses proposed. B1 unit also proposed, although unclear whether this can be provided as well as community space.

As can be seen from the above analysis, the components of the MGF district centre are better aligned with the aspirations of the development brief than the WGF proposal. In particular, MGF has a doctors surgery, nursery and additional Class A retail floorspace in addition to the proposed foodstore. When compared with the Hendra proposal, the MGF

² Removed from scheme during determination

land use mix is similar, although the non-foodstore floorspace is smaller in the Hendra scheme and there is no allowance for a doctors surgery/health centre use.

In addition, whilst each of these 'district centre' proposals are in outline form, the layout of the MGF scheme appears to offer the best fit with a district centre, providing a cluster of land uses. In contrast, the foodstore in the Hendra proposal is divorced from the other land uses within that proposal, whilst the uses in the WGF scheme are separated from each other. Clearly, these observations must be seen in context, although they reinforce the need for controls to be placed on any planning permission issued by the Council to ensure that an attractive and user-friendly district centre is provided.

Policy Context

The local and national planning policy context for retail proposals in Threemilestone is set out in our letter dated 4th February 2014 and therefore there is no need to repeat this again here. However, it is important to note that like the WGF site, the MGF application site is also not allocated for retail development and is not within a defined town centre. Therefore, the NPPF tests of retail impact and the sequential approach to site selection will apply.

Retail Expenditure Capacity in Truro

Again, our 4th February letter provides a detailed review of retail expenditure capacity issues in Truro and there is no need to repeat this review here, save for the acknowledgement that the MGF supermarket, like the WGF supermarket, would, on its own, soak up all of the capacity forecast for Truro up to 2031. Whilst this lack of capacity is not a reason for refusal in its own right, issues surrounding 'need' and retail expenditure capacity remain a material consideration for the Council when deciding whether it can choose between these sites in terms of the sequential approach and also the severity of the impact of new retail floorspace on existing facilities in Truro.

The Sequential Approach to Site Selection

Given the location and planning policy status of the application site, there is a need to assess the proposal against the sequential approach to site selection.

The Amethyst Retail Assessment argues that there is a location-specific need in this instance (via the adopted development brief) although 'for completeness' they do go on to consider alternative sites. When considering alternative sites, Amethyst argue that the scheme cannot be disaggregated, relying on the contents of the Dundee judgement and the need to provide a district centre package of uses.

Whilst Amethyst highlight that reference to disaggregation (of retail proposals into their constituent parts) is not included in the NPPF, we consider that it is still a factor to be considered when deciding how to apply the sequential test for individual proposals. Having regard to the NPPF, along with the recently published NPPG, it is our view that the

area of search for alternative sites and how these sites should be assessed is influenced by the adopted development brief and the weight which the Council decides to place upon it. Whilst it is not part of the development plan, there is a clear aspiration by the Council for a new district centre in the Threemilestone area and this could lead the Council to the conclusion that it should only consider sites that are within this area and can meet the aspiration for a new district centre.

Even if the Council decides that sites in and around Truro city centre should also be assessed, our previous analyses for the Council have shown that there are not suitable, available and viable alternative locations to accommodate a supermarket use, let alone a wider development package including other main town centre uses.

Turning to the assessment of alternative out of centre sites in Threemilestone, our 4th February 2014 letter spent some time assessing whether any of the current or potential future planning application sites are sequentially superior because they are more accessible and better connected to nearby town centres. As part of that assessment, we considered the arguments put forward by the promoter of the Hendra site in relation to a collection of shops and services at Threemilestone. In particular, we considered whether it was appropriate to define these shops and services as a defined centre for the purposes of the sequential test and, if so, whether the Hendra site performed better than other nearby sites, particularly the WGF site, in terms of accessibility and connectivity.

The conclusion of that assessment was that the WGF and Hendra sites were sequentially equal and, having considered the characteristics of the MGF site, we do not consider that the MGF site is either sequentially inferior or superior to these two other sites in terms of connectivity to defined town centres. As stated in our 4th February advice, the Council will need to consider wider aspects of accessibility, but if a similar conclusion to connectivity is reached then the Council is able to conclude that the MGF farm site does not fail the sequential approach and other factors will need to be considered if a choice is to be made between the MGF, WGF and Hendra proposals.

Impact

Impact on Investment in Truro City Centre

Within our advice to the Council in relation to the proposed supermarket at WGF, the following comments were made:

In particular, we are not aware of any supermarket/convenience goods floorspace proposals in the city centre and we are not aware of any on-going interest from grocery operators in occupying the former Somerfield unit. In addition, assuming it's controlled by condition, the scale of comparison goods floorspace within the proposed supermarket is unlikely on its own to significantly affect the on-going efforts to bring forward a comparison goods-led retail redevelopment scheme at Pydar Street.

Therefore, based upon the impact associated with the Willow Green Farm application, we do not consider that there is evidence to show that planned investment in Truro city centre will be affected.

In relation to existing investment, there is a need to consider whether existing city centre occupiers and property owners in the city centre will alter their investment as a consequence of the proposed development. Change would occur, for example, where retail store viability/profitability is affected or out of centre competition is becoming more severe. In this instance, and with reference to our assessment of impact later in this advice letter, it is clear that both the convenience and comparison goods sectors in the city centre are coming under increasing pressure from retail development proposals in Truro and surrounding settlements. We consider that the provision of two new supermarkets in Truro is unlikely to fundamentally affect investment decisions, although the scale of impact is likely to start to raise question marks over whether there is an economic benefit in further investment. This view is supported by the assessment of existing store trading conditions and our retail expenditure capacity assessment.

Given the size of the proposed supermarket at MGF, including the smaller amount of comparison goods floorspace, we consider that the above advice is also relevant for the MGF proposal.

The MGF application also proposes additional Class A retail floorspace (1,995sq m net), including comparison goods floorspace and Class A3/4/5 floorspace (677sq m gross). In terms of planned investment, these types of uses are likely to be found in the forthcoming Pydar Street proposals and therefore there is the possibility of an overlap between the Pydar Street and MGF schemes. The significance of this overlap will depend, in our opinion, upon the scale of retail floorspace within the MGF scheme and how the floorspace is delivered. In particular, if the comparison goods retail floorspace at MGF is unrestricted there is the potential for MGF to accommodate retailers who would otherwise occupy space in the city centre. Therefore, on the basis that the comparison floorspace is controlled (via planning condition), overlap with the city centre retail offer can be reduced and thus aligning the planned district centre to meeting the needs of local residents rather than competing with the city centre. A similar approach should also be taken in relation to the proposed Class A3/4/5 uses. If this can be achieved then, whilst a certain amount of overlap between these proposals can never be eliminated, we do not consider that the MGF proposal will have an adverse effect on planned investment in the city centre.

In relation to the impact of the proposed comparison/food&drink floorspace on existing city centre investment, the use of strict controls can also assist in reducing impacts, although our comments on the WGF proposal remain valid and we remain concerned that the increasing pressure being put on Truro from out of centre proposals elsewhere in the city and in other settlements will start to affect investment decisions in the city centre.

Impact on Truro City Centre Vitality and Viability

As set out in our advice letter of 4th February, there are a number of factors to be considered when judging the overall impact of retail proposals on the future health of Truro city centre. These are the financial impact of the proposal on the convenience and comparison goods sectors in the centre, the current health and trading performance of the centre, the likely extent of trading overlap between these shopping destinations, the cumulative impact of other retail proposals in Truro and elsewhere and, finally, the potential for the proposal to provide any linked trips or spin-off benefits for the city centre.

A key part of the assessment of impact is the financial effect of the MGF proposals. Given that the MGF proposal includes both convenience and comparison goods floorspace, separate assessments are included in the Amethyst Retail Assessment. Having reviewed the Amethyst assessment, we raise the following concerns over its robustness:

- o the use of population data (from the 2010 Cornwall Retail Study) which has now been superseded by more recent data, from the 2011 Census;
- o the use of per capita expenditure (from the 2010 Cornwall Retail Study) which has now been superseded by more recent data published by Experian;
- o the lack of a comprehensive cumulative impact assessment for convenience and comparison goods; and
- o the use of survey data from 2008 to inform the impact analysis.

As a consequence, we have undertaken our own analysis of convenience and comparison goods impact and this follows the same format as the analysis undertaken for the WGF proposal.

Our predicted levels of convenience goods expenditure diversion from the city centre are set in Table A below

Table A: Trade diversion from convenience goods stores in Truro city centre, 2019

City Centre Facility	Pre-Impact Total Turnover, 2019 (£m)	Trade Diversion to Waitrose/Taste of Cornwall (£m)	Trade Diversion to Maiden Green Farm (£m)	Solus Impact of Maiden Green Farm	Cumulative Impact
Marks & Spencer	£4.4m	£0.4m	£0.34m	-8%	-16%
Co-op	£6.0m	£0.9m	£0.32m	-6%	-20%
Iceland	£1.6m	£0.1m	£0.11m	-7%	-11%
Other	£5.2m	£0.4m	£0.35m	-7%	-14%

Overall, the MGF convenience goods floorspace will increase the downwards pressure on convenience goods store turnover levels in the city centre. We predict that the committed Waitrose/Taste of Cornwall scheme will lead to a 10% reduction in city centre turnover levels and this will increase to 16% when the MGF proposal is introduced.

This level of cumulative impact is very similar to our level of predicted impact for the WGF supermarket. This is unsurprising as the proposals are very similar in size in terms of convenience goods floorspace and their location. Therefore, the comments made in pages 17 and 18 of our 4th February letter regarding the impact on the city centre's convenience goods sector are equally relevant for the MGF proposal. The key messages of this advice were:

- o It is unlikely that one new supermarket (beyond Waitrose/Taste of Cornwall) would lead to closure of the Co-op and Marks & Spencer stores in the city centre;
- o However, increasing the scale of out of centre supermarkets in Truro/Threemilestone is leading to increasing pressure on the city centre's convenience good sector which we feel is in need of support in order that it can continue to offer choice and variety.

Turning to the impact of the proposed comparison goods floorspace, we estimate that the combined turnover of the comparison floorspace in the proposed supermarket and the separate comparison goods floorspace will be £18.8m and around two-thirds of this expenditure will be diverted from stores in Truro city centre. Using the same data as we adopted for advice on the WGF application, this leads to a solus impact on the city centre's comparison goods sector of 3% and a cumulative impact of 8%. As a consequence we repeat our advice to the Council in relation to the WGF proposal:

On its own, an impact of 2%-3% from Willow Green Farm may not be seen as a significant adverse impact in its own right. However, it is part of a growing impact on Truro caused by the approval of retail schemes in surrounding settlements. The approval of schemes such as the Kingsley and Treloggan Road proposals in Newquay is seen by the Council as benefitting Newquay residents as it will enable shorter shopping trips and reduce leakage of retail expenditure to Truro. This obviously has a negative impact on the successful performance of Truro city centre, which is then further compounded by the impact of new out of centre floorspace in Truro such as Willow Green Farm. This situation requires a balancing exercise from the Council, balancing the perceived benefits to other settlements against the impact on Truro, leading to a reduction in its market share. Whilst a cumulative impact of 8% does not lead us to the conclusion that there is a significant cause for concern, large comparison goods areas in out of centre supermarkets in Truro do pose direct competition for the city centre.

Attached to this letter is our overall financial impact assessment for the MGF supermarket. Taking into account the convenience and comparison goods impacts outlined above, it

is our view that MGF will have a 3% impact on the retail sector in Truro city centre by 2019. This is based on a diversion of £13.4m of retail expenditure from the city centre economy.

Taken together with other committed developments in Truro and elsewhere, the city centre retail economy will lose 9% of its future (2019) turnover, which is equivalent to a reduction of £38.6m. The MGF proposal is equivalent to around one third of this wider cumulative impact.

In terms of the consequences for this level of impact, there are a number of factors to consider. First, the removal of £13.4m of retail expenditure from the city centre economy, primarily the comparison goods sector, is a clear negative adverse impact of the proposed development. This impact is part of a growing financial impact on the city centre, which could reach almost 10% of annual turnover when other schemes are considered.

Added to this impact is the competition posed by the proposed development. Both the convenience and comparison land use sectors in the city centre will be affected, although we appreciate that there will be some differentiation for the convenience goods sector, which has more of a top-up food shopping role, and the scale of competition with the comparison goods sector can also be controlled if conditions are applied to any permission granted by the Council. Nevertheless, for the avoidance of doubt, the comparison goods financial impact of the MGF proposal is marginally higher than the WGF proposal, although the difference in financial terms is not significant.

In addition, and like the WGF scheme, there are also unlikely to be any spin-off benefits for the city centre associated with the MGF scheme. It is too far away from the city centre to encourage walking linked trips, although the scale of retail offer in the city centre is such that it will continue to attract shopping trips notwithstanding the Willow Green proposal even if they made on separate occasions.

Taking all of these factors into account, it is our conclusion that the retail element of the MGF proposal will have an adverse impact upon the health of Truro city centre but its contribution to the wider cumulative impact on the centre is unlikely to be significantly adverse. In reaching this conclusion we have taken into account the same factors as used in our advice on the WGF proposal, namely:

- The current good health of the city centre;
- its catchment area and trading profile;
- the likelihood that this proposal will not lead to significant closure of stores in the city centre;
- the likelihood that the proposed development will not lead to relocations from the city centre;
- whilst there is direct competition, the level of competition is at a manageable level (subject to conditions); and
- the proportion of the cumulative impact which is attributable to this proposal.

However, in order to control this impact, we strongly recommend that the Council, if it decides to grant planning permission for this proposal, to impose conditions on the approved retail floorspace which limit the amount of total net sales floorspace and the amount of this floorspace which can be devoted to the sale of convenience and comparison goods.

Moreover, these conclusions apply to the MGF scheme alone and should not be assumed to apply to other supermarket and retail proposals in Truro which may come forward in the future. We recommend that the impact of each scheme is assessed separately and that scenarios which test the impact of approving more than one proposal are accompanied by an updated cumulative impact assessment.

Summary and Conclusions

Given the location and planning policy status of the MGF, our advice to the Council has concentrated upon the compliance of the proposed retail floorspace with the sequential approach to site selection and the scale of impact of the retail floorspace on the health of Truro city centre.

In relation to the sequential approach, we have concluded that there are not any in-centre or edge-of-centre sites which can accommodate this use. This conclusion is consistent with our recent advice to the Council in relation to the committed Waitrose/Taste of Cornwall proposal and current WGF proposal.

However, there is also a need to consider whether there are any alternative out of centre sites which are more accessible and/or better connected to a town centre than the MGF site. The locations which we have considered are: Truro City FC; Willow Green Farm; Ivydene Farm; Land to the north of the A390 and east of the Park & Ride facility; and, Langarth Farm. In terms of connectivity to defined town centres, we do not consider that the MGF site is out-performed by any other location although, by the same token, there is also no evidence to demonstrate that MGF is materially better in terms of connectivity than these sites.

In relation to accessibility, this is a wider matter for the Council to consider, but if a similar conclusion to connectivity is reached, then the Council is able to conclude that the MGF site does not fail the sequential approach to site selection and other factors will need to be considered if a choice is to be made between competing proposals.

In relation to the need to make a choice between out of centre supermarket proposals in Truro, the assessment of quantitative need in the 2010 Cornwall Retail Study for additional convenience goods floorspace in Truro suggests that, in addition to the Waitrose/Taste of Cornwall commitment, there is likely to be expenditure capacity for one new supermarket in Truro up to 2031. This suggests that the Council may wish to make a choice between the MGF and other current/forthcoming proposals for supermarkets in Truro.

In relation to the impact of the proposed supermarket, we forecast the following financial impacts on Truro city centre:

- o a solus 7% impact on the convenience goods sector, with a cumulative impact of 16%;
- o a solus 3% impact on the comparison goods sector, with a cumulative impact of 8% impact;
- o a total solus retail impact of 3%, which rises to 9% when other commitments are taken into account.

In deciding how these impacts will affect the health of Truro city centre we have taken into account the fact that the city centre is in a good state of health and is not reliant on convenience goods expenditure to maintain its role and status, albeit that convenience goods expenditure does contribute to an important mix of uses in the centre. We have also taken into account the potential trading overlap between the proposed retail floorspace and the city centre and have found that there will be some overlap, particularly in relation to comparison goods shopping. As a consequence, we have taken into account the need to control the proposed floorspace, particularly in relation to the size of the proposed supermarket and the number and size of the other Class A retail floorspace.

As part of our assessment we have also noted that the proposed supermarket is unlikely to provide spin-off benefits for the city centre. Finally, we have given weight to the likelihood that the MGF proposal will have a larger impact on the city centre than the Waitrose/Taste of Cornwall proposal and will contribute to a growing cumulative impact on the city centre, albeit that MGF is a minority part of this total impact.

Taking all of these factors into account, it is our conclusion that the retail elements of the MGF proposal will have an adverse impact upon the health of Truro city centre but its contribution to the wider cumulative impact on the centre is unlikely to be significantly adverse (assuming suitable planning conditions can be imposed).

I trust that the contents of this letter provide you with sufficient information and advice. However, if you have any queries, or require additional information, please do not hesitate to contact me.

Yours sincerely



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

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TABLE 2: TOTAL RETAIL IMPACT OF MAIDEN GREEN FARM ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to Maiden Green Farm	Residual Turnover	Solus Impact of Willow Green Farm	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.1	£14.3	-7%	-16%
Comparison	£422.5	£23.5	£399.0	-6%	£12.3	£386.7	-3%	-8%
Total	£439.6	£25.2	£414.4	-6%	£13.4	£401.0	-3%	-9%

Notes:

convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
diversion to Maiden Green Farm based on GVA assessment

Appendix C:

GVA Hendra advice letter 4th June 2014



Our ref:
Your ref:

4th June 2014

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BY E-MAIL

Dear Tim

Land to the North of the A390, Threemilestone (PA14/00226)

Assessment of Retail Planning Policy

Introduction

Further to your instructions, we have now completed our review of the retail land use elements of the above planning application on land to the north of the A390 in Threemilestone. We understand that the site is commonly known as 'the Hendra site' and therefore we will use this reference when referring to the site and the application.

Like our advice to the Maiden Green Farm ('MGF') and Willow Green Farm ('WGF') proposals, the retail land use element of the proposals at the Hendra site have been considered in the context of the development plan for the area and other material planning policy considerations such as the National Planning Policy Framework ('NPPF') and the National Planning Practice Guidance ('NPPG').

In accordance with our instructions from the Council, we have reviewed the relevant documentation submitted in support of this application. The focus for our review has been a Planning & Retail Statement ('PRS'), prepared by Mango Planning, dated December 2013. In addition, the applicant has sent in supplementary information which deals with the net sales area of the proposed supermarket.

At present, the application at the Hendra site is one of three current applications for large-scale retail development in Threemilestone. The other two applications are at WGF and MGF. We have already provided the Council with advice in relation to these proposals, in letters dated 4th February 2014 and 2nd May 2014.

The Proposed Development

The planning application at the Hendra site proposes a mixture of land uses. Paragraph 5.2 of the PRS suggests the following components:

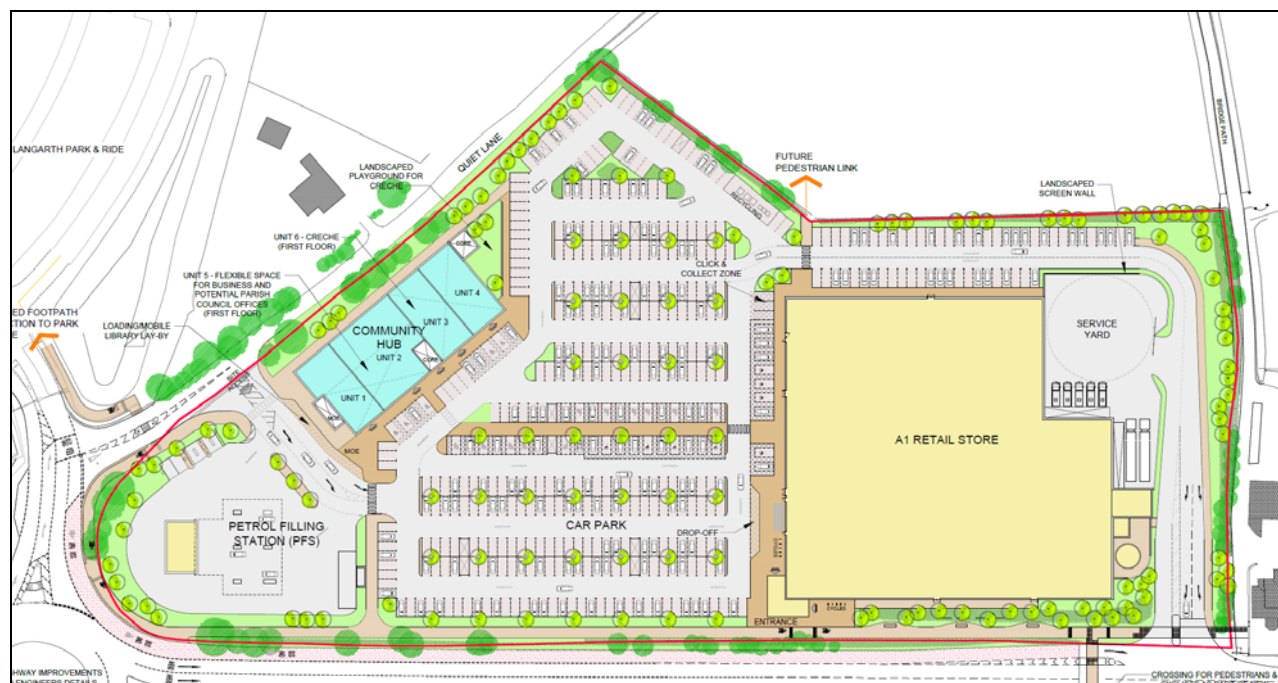
- Supermarket – 6,708sq m gross / 4,360sq m net
- Four units totalling 1,928sq m gross for Class A1, A3, A3/A4, B1, D1, D2 uses.
- A community room (to be offered to the Community Council)
- A 6 pump petrol filling station
- A 455 space car park.

Paragraph 5.5 of the PRS goes on to note that, in addition to the supermarket and PFS, the 'community hub' would contain:

- A class D2 community meeting room
- Class B1 starter offices
- Class A1 coffee shop
- Class A3 restaurant
- Class A3/4 pub restaurant
- Class D1 creche

We provide below an extract from the submitted illustrative site layout, which shows the supermarket unit separated from the other uses by a large surface level car parking area. In relation to the 'community hub', the illustrative layout shows four units at ground floor level and the crèche and the flexible business space/parish council offices at first floor level. The four ground floor units are not annotated and therefore it is difficult to be certain from the applicant's illustrative layout how the units in the bullet points above will be arranged.

Figure 1: extract from illustrative layout plan for the Hendra site



The proposed supermarket will have a net sales area of 4,360sq m, comprising 3,052sq m for the sale of convenience goods and 1,308sq m for the sale of comparison goods. There is no named operator for the supermarket unit.

Based on the contents of the submitted PRS, it is not entirely clear on what basis the scheme at the Hendra site is being promoted. At paragraph 5.1, the proposal is promoted as an 'extension to the existing Threemilestone village centre'. At paragraph 6.23, it is also suggested that this application complies with the requirements of the adopted development brief for land to the north of the A390 at Threemilestone.

As discussed in our previous advice to the Council, the adopted development brief identifies a need for a new district centre and, whilst it explains some of the ingredients required, does not choose a specific location. Instead four areas are shown on a plan and it will be for the Council to determine whether the Hendra application is in accordance with one of these areas.

It is not clear therefore from the PRS whether this proposal on the Hendra site is fulfilling the requirements of a new district centre particularly given the choice of text at paragraph 5.1 of that report. For the avoidance of doubt, and as will be discussed later, the village centre in Threemilestone, which lies on the opposite side of the A390 is not a defined retail centre in the development plan retail hierarchy.

We now re-provide Table A which originally featured in our advice letter on the MGF application, which provides a comparison between the content of the application on the Hendra site with the content of the MGF and WGF applications.

Table A: comparison between the component parts of the Maiden Green Farm, Willow Green Farm and Hendra 'district centre' proposals

District Centre Component	Willow Green Farm	Maiden Green Farm	Hendra
New retail floorspace, including a single medium sized foodstore	Foodstore only, no additional A1 retail floorspace	Foodstore and additional convenience/comparison goods floorspace	Foodstore only, no additional A1 retail floorspace
Community use	Yes	Yes	Yes
Doctors surgery/health centre	No	Yes	No
Public house/restaurant	Yes	No specific public house ¹ , but separate restaurant facilities are provided (see below)	Yes
Children's nursery	No	Yes	Yes
Parking for mobile library unit	Unclear from submitted application, partially due to its outline nature	Shown on indicative layout plan	Shown on indicative layout plan
Accommodation for small businesses and services to complement the main uses	No other proposed uses in WGF district centre	Café/bar/restaurant uses proposed within MGF district centre	Café/bar/restaurant uses proposed. B1 unit also proposed, although unclear whether this can be provided as well as community space.

As can be seen from the above analysis, the components of the Hendra site proposal is similar to the MGF proposed district centre although the non-supermarket A1 retail floorspace is smaller and apparently confined to a 'coffee shop'. In addition, there is no allowance for a doctors surgery/health centre use.

¹ Removed from scheme during determination

The Hendra proposals are similar to the WGF application and includes a crèche, which the WGF scheme does not.

In relation to layout, whilst this application is in outline, the foodstore in the Hendra proposal is divorced from the other land uses within that proposal which is not, in our opinion, a well-defined centre. In addition, the proposed uses are divorced from the village centre in Threemilestone (separated by the A390 and housing) which does not lend itself to the 'extension to the village centre' promoted in Section 5 of the PRS.

Clearly, these observations must be seen in context, although they reinforce the need for controls to be placed on any planning permission issued by the Council to ensure that an attractive and user-friendly district centre is provided in line with the contents of the adopted development brief.

Policy Context

The local and national planning policy context for retail proposals in Threemilestone is set out in our letter dated 4th February 2014 and therefore there is no need to repeat this again here. However, it is important to note that like the WGF and MGF sites, the Hendra application site is also not allocated for retail development and is not within a defined town centre. Therefore, the NPPF tests of retail impact and the sequential approach to site selection will apply.

Retail Expenditure Capacity in Truro

Again, our 4th February letter provides a detailed review of retail expenditure capacity issues in Truro and there is no need to repeat this review here, save for the acknowledgement that the Hendra supermarket, like the WGF and MGF supermarkets, would, on its own, soak up all of the capacity forecast for Truro up to 2031. Indeed, at 3,052sq m net convenience goods floorspace, it is beyond the capacity range of 1,000-2,700sq m for Truro once the Waitrose/Taste of Cornwall commitment is taken into account.

As mentioned previously, whilst this lack of capacity is not a reason for refusal in its own right, issues surrounding 'need' and retail expenditure capacity remain a material consideration for the Council when deciding whether it can choose between these sites in terms of the sequential approach and also the severity of the impact of new retail floorspace on existing facilities in Truro.

The Sequential Approach to Site Selection

Given the location and planning policy status of the application site, there is a need to assess the proposal against the sequential approach to site selection.

The applicant's case on this issue is based on the suggestion that the village centre in Threemilestone should be regarded as a defined centre and thus the sequential site assessment process should be undertaken with regards to accessibility and connectivity with that 'centre'.

This argument was known at the time of our 4th February 2014 advice letter in relation to the WGF site and proposals and the following advice given:

In their Planning & Retail Statement, the applicants for the Hendra site also argue that their site should be preferred in terms of accessibility due to the proximity to local shops and services in Threemilestone. It is argued that, whilst not a formal 'local centre', this area has the characteristics of one and therefore its connectivity with the Hendra site should be explored.

In our view, the proper forum for consideration of Threemilestone as a defined local centre should be through the development plan preparation process and the clear starting point for consideration of this application is that it is not a defined centre. Therefore, the perceived connectivity from potential development sites to this area is not a matter for the proper application of the sequential approach.

Notwithstanding this view, we have compared the linkages between the Hendra and Willow Green Farm sites to these shops and services. Importantly, linkages between both of these sites require the need to cross the A390. The A390 presents a large barrier to north-south movement and, in order to assist this movement, new pedestrian cross facilities will be required. We understand that the Willow Green Farm application proposes two crossings: one close to the location of the proposed supermarket and another close to the south-eastern corner of the Hendra site. The current Hendra application also proposes a new crossing close to the south-western corner that that site, which would be close to a bridleway which connects the A390 to the area of shops and services. We understand that all of these proposed crossings would be signal-controlled.

Whilst the location (and quality) of these crossing points can be set for the Willow Green application, it should be noted that layout is a reserved matter for both the Hendra and Willow Green Farm applications and access is also a reserved matter for the Hendra scheme². Therefore, precise distance measurements between the supermarket entrances and locations within the customer car parking areas and the shops/services in Threemilestone cannot be set. However, it is possible that the walking distance from the Hendra site may be shorter than the Willow Green Farm site and there is a need to consider whether this (potentially) short distance is significant in the context of 'connectivity'. In our view, the key influence over connectivity is the A390, with a decision to cross this road a much more important factor in the strength of linkages than a relatively small difference in walking distances. Therefore, with both the Willow Green Farm and Hendra sites on the opposite side of the A390, we do not consider that there is a material difference between

² Access is not a reserved matter for the Willow Green Farm scheme.

these two sites in terms of connectivity with the small collection of shops and services in Threemilestone.

The consequence of the above advice was that:

- o Threemilestone village centre should not be used as a focus for the sequential test; and
- o Even if it were then the Hendra and WGF sites were sequentially equal.

In our May 2014 advice to the Council in relation to the MGF site, we provided our view that the MGF site was neither sequentially inferior or superior to these two other sites in terms of connectivity to defined town centres (whether it be the city centre or Threemilestone village centre, the former being the only defined centre).

As stated in our previous advice, the Council will need to consider wider aspects of accessibility, but if a similar conclusion to connectivity is reached then the Council is able to conclude that the Hendra site does not fail the sequential approach and other factors will need to be considered if a choice is to be made between the MGF, WGF and Hendra proposals.

In relation to the city centre, this is not featured to any significant extent in the applicant's analysis, save for a reference to the extant permission and the Council accepting that there were no sites within or edge of the city centre which could accommodate that proposal. We consider this to be the wrong way of approaching the sequential site assessment exercise. Compliance based on a different scheme does not make the current scheme acceptable and a fresh assessment is required.

When conducting this assessment, consideration needs to be given to whether the constituent parts of the proposal can be disaggregated and placed on to separate sites. On this issue, and given that the PRS claims that the Hendra proposals have some connection with the adopted development brief for land north of the A390, we repeat the advice we gave to the Council in relation to the MGF application:

"Having regard to the NPPF, along with the recently published NPPG, it is our view that the area of search for alternative sites and how these sites should be assessed is influenced by the adopted development brief and the weight which the Council decides to place upon it. Whilst it is not part of the development plan, there is a clear aspiration by the Council for a new district centre in the Threemilestone area and this could lead the Council to the conclusion that it should only consider sites that are within this area and can meet the aspiration for a new district centre.

Even if the Council decides that sites in and around Truro city centre should also be assessed, our previous analyses for the Council have shown that there are not suitable, available and viable alternative locations to accommodate a supermarket use, let alone a wider development package including other main town centre uses".

Impact

Impact on Investment in Truro City Centre

Within our advice to the Council in relation to the proposed supermarket at WGF, the following comments were made:

In particular, we are not aware of any supermarket/convenience goods floorspace proposals in the city centre and we are not aware of any on-going interest from grocery operators in occupying the former Somerfield unit. In addition, assuming it's controlled by condition, the scale of comparison goods floorspace within the proposed supermarket is unlikely on its own to significantly affect the on-going efforts to bring forward a comparison goods-led retail redevelopment scheme at Pydar Street.

Therefore, based upon the impact associated with the Willow Green Farm application, we do not consider that there is evidence to show that planned investment in Truro city centre will be affected.

In relation to existing investment, there is a need to consider whether existing city centre occupiers and property owners in the city centre will alter their investment as a consequence of the proposed development. Change would occur, for example, where retail store viability/profitability is affected or out of centre competition is becoming more severe. In this instance, and with reference to our assessment of impact later in this advice letter, it is clear that both the convenience and comparison goods sectors in the city centre are coming under increasing pressure from retail development proposals in Truro and surrounding settlements. We consider that the provision of two new supermarkets in Truro is unlikely to fundamentally affect investment decisions, although the scale of impact is likely to start to raise question marks over whether there is an economic benefit in further investment. This view is supported by the assessment of existing store trading conditions and our retail expenditure capacity assessment.

Given the size of the proposed supermarket at the Hendra site, we consider that the above advice is also relevant for this proposal (as it is also appropriate to the MGF proposal).

The Hendra also proposes additional Class A retail floorspace (Class A1, Class A3 and mixed Class A3/4), although a definitive split between Class A uses and other uses in the 'community hub' is not provided.

In terms of planned investment, these types of uses are likely to be found in the forthcoming Pydar Street proposals and therefore there is the possibility of an overlap between the Pydar Street and Hendra schemes. The significance of this overlap will depend, in our opinion, upon the scale of retail floorspace within the Hendra scheme and how the floorspace is delivered. In particular, if the retail floorspace at the Hendra site is

unrestricted there is the potential for this scheme to accommodate retailers who would otherwise occupy space in the city centre.

Therefore, on the basis that the comparison floorspace is controlled (via planning condition), overlap with the city centre retail offer can be reduced and thus aligning the planned district centre to meeting the needs of local residents rather than competing with the city centre. If this can be achieved then, whilst a certain amount of overlap between these proposals can never be eliminated, we do not consider that the proposal at the Hendra site will have an adverse effect on planned investment in the city centre. In relation to the impact of the proposed retail floorspace on existing city centre investment, the use of strict controls can also assist in reducing impacts, although potentially not eliminate them.

Impact on Truro City Centre Vitality and Viability

As set out in our previous advice letters, there are a number of factors to be considered when judging the overall impact of retail proposals on the future health of Truro city centre. These are the financial impact of the proposal on the convenience and comparison goods sectors in the centre, the current health and trading performance of the centre, the likely extent of trading overlap between these shopping destinations, the cumulative impact of other retail proposals in Truro and elsewhere and, finally, the potential for the proposal to provide any linked trips or spin-off benefits for the city centre.

A key part of the assessment of impact is the financial effect of the Hendra proposal. Whilst the Hendra proposal includes both convenience and comparison goods floorspace, the PRS only provides a detailed assessment of convenience goods impact, leaving the comparison goods impact assessment to a brief summary in the main text of the report. Having reviewed the analysis contained within the PRS, we raise the following concerns over its robustness:

- the use of population data (from the 2010 Cornwall Retail Study) which has now been superseded by more recent data, from the 2011 Census;
- the use of per capita expenditure (from the 2010 Cornwall Retail Study) which has now been superseded by more recent data published by Experian;
- the lack of a comprehensive cumulative impact assessment for convenience and comparison goods; and
- the use of survey data from 2008 to inform the impact analysis.

As a consequence, we have undertaken our own analysis of convenience and comparison goods impact and this follows the same format as the analysis undertaken for the Hendra proposal.

Our predicted levels of convenience goods expenditure diversion from the city centre are set in Table A below

Table A: Trade diversion from convenience goods stores in Truro city centre, 2019

City Centre Facility	Pre-Impact Total Turnover, 2019 (£m)	Trade Diversion to Waitrose/Taste of Cornwall (£m)	Trade Diversion to Hendra (£m)	Solus Impact of Hendra	Cumulative Impact
Marks & Spencer	£4.4m	£0.4m	£0.34m	-9%	-16%
Co-op	£6.0m	£0.9m	£0.33m	-6%	-20%
Iceland	£1.6m	£0.1m	£0.12m	-8%	-12%
Other	£5.2m	£0.4m	£0.36m	-7%	-14%

In a similar manner to our other two impact assessments, the convenience goods floorspace within the proposed Hendra supermarket will further reduce the turnover of the city centre's convenience goods sector beyond the level which would be experienced following the Waitrose/Taste of Cornwall commitment. We predict that the committed Waitrose/Taste of Cornwall scheme will lead to a 10% reduction in city centre turnover levels and this will increase to 17% when the Hendra proposal is introduced.

The financial and proportionate impact of the convenience goods element of the Hendra supermarket is very similar to that the other two proposals, at £1.1m.

In relation to the consequences of this level of impact, whilst it is unlikely that one additional new supermarket (beyond Waitrose/Taste of Cornwall) would lead to closure of the Co-op and Marks & Spencer stores in the city centre, the Hendra proposal will, like the two other current proposals, provide an increase in the pressure on the city centre's convenience good sector which we feel is in need of support in order that it can continue to offer choice and variety.

Turning to the impact of the proposed comparison goods floorspace, we have, in order to provide consistency, used a sales density of £9,000/sq m for the proposed supermarket on the Hendra site. This sales density leads to a total turnover of £11.8m.

In line with our estimates for the comparison goods floorspace element of the WGF supermarket, we consider that around two-thirds of this turnover will be diverted from stores in Truro city centre. Using the same data as we adopted for advice on the MGF and WGF applications, this leads to a solus impact on the city centre's comparison goods sector of 2% and a cumulative impact of 7%. For the avoidance of doubt, the comparison goods impact of the Hendra scheme is the lowest of the three current proposals, the others having a 3% solus impact and an 8% cumulative impact.

However, given the similarities of all of these financial impacts, we repeat our advice to the Council in relation to the WGF proposal:

On its own, an impact of 2%-3% from Willow Green Farm may not be seen as a significant adverse impact in its own right. However, it is part of a growing impact on Truro caused by the approval of retail schemes in surrounding settlements. The approval of schemes such as the Kingsley and Treloggan Road proposals in Newquay is seen by the Council as benefitting Newquay residents as it will enable shorter shopping trips and reduce leakage of retail expenditure to Truro. This obviously has a negative impact on the successful performance of Truro city centre, which is then further compounded by the impact of new out of centre floorspace in Truro such as Willow Green Farm. This situation requires a balancing exercise from the Council, balancing the perceived benefits to other settlements against the impact on Truro, leading to a reduction in its market share. Whilst a cumulative impact of 8% does not lead us to the conclusion that there is a significant cause for concern, large comparison goods areas in out of centre supermarkets in Truro do pose direct competition for the city centre.

Attached to this letter is our overall financial impact assessment for the Hendra supermarket. Taking into account the convenience and comparison goods impacts outlined above, it is our view that Hendra supermarket will have a 2% impact on the retail sector in Truro city centre by 2019. This is based on a diversion of £8.8m of retail expenditure from the city centre economy. Taken together with other committed developments in Truro and elsewhere, the city centre retail economy will lose 8% of its future (2019) turnover, which is equivalent to a reduction of £34m.

In terms of the consequences for this level of impact, there are a number of factors to consider. First, the removal of £8.8m of retail expenditure from the city centre economy, primarily the comparison goods sector, is a clear negative adverse impact of the proposed development. This impact is part of a growing financial impact on the city centre, which grows to 8% of annual turnover when other schemes are considered.

Added to this impact is the competition posed by the proposed development. Both the convenience and comparison land use sectors in the city centre will be affected, although we appreciate that there will be some differentiation for the convenience goods sector, which has more of a top-up food shopping role, and the scale of competition with the comparison goods sector can also be controlled if conditions are applied to any permission granted by the Council.

In addition, and like the WGF and MGF schemes, there are also unlikely to be any spin-off benefits for the city centre associated with the Hendra proposal. It is too far away from the city centre to encourage walking linked trips, although the scale of retail offer in the city centre is such that it will continue to attract shopping trips notwithstanding the Hendra proposal even if they made on separate occasions.

Taking all of these factors into account, it is our conclusion that the supermarket element of the Hendra proposal will have an adverse impact upon the health of Truro city centre but its contribution to the wider cumulative impact on the centre is unlikely to be significantly adverse. In reaching this conclusion we have taken into account the same factors as used in our previous advice on the WGF and MGF proposals, namely:

- The current good health of the city centre;
- its catchment area and trading profile;
- the likelihood that this proposal will not lead to significant closure of stores in the city centre;
- the likelihood that the proposed development will not lead to relocations from the city centre;
- whilst there is direct competition, the level of competition is at a manageable level (subject to conditions); and
- the proportion of the cumulative impact which is attributable to this proposal.

However, in order to control this impact, we strongly recommend that the Council, if it decides to grant planning permission for this proposal, to impose conditions on the approved retail floorspace which limit the amount of total net sales floorspace and the amount of this floorspace which can be devoted to the sale of convenience and comparison goods.

Moreover, these conclusions apply to the Hendra scheme alone and should not be assumed to apply to other supermarket and retail proposals in Truro which may come forward in the future. We recommend that the impact of each scheme is assessed separately and that scenarios which test the impact of approving more than one proposal are accompanied by an updated cumulative impact assessment.

Summary and Conclusions

Given the location and planning policy status of the Hendra, our advice to the Council has concentrated upon the compliance of the proposed retail floorspace with the sequential approach to site selection and the scale of impact of the retail floorspace on the health of Truro city centre.

In relation to the sequential approach, we have concluded that there are not any in-centre or edge-of-centre sites which can accommodate this use. This conclusion is consistent with our recent advice to the Council in relation to the committed Waitrose/Taste of Cornwall proposal and current WGF and MGF proposals.

However, there is also a need to consider whether there are any alternative out of centre sites which are more accessible and/or better connected to a town centre than the Hendra site. This exercise has been undertaken in relation to the three current retail proposals in Threemilestone and has considered the Hendra site, MGF, WGF, Truro City FC; Willow Green Farm; Ivydene Farm; and, Langarth Farm. Particular focus has been placed on the Hendra site, WGF and MGF. In terms of connectivity to defined town centres, we

do not consider that the Hendra site is out-performed by any other of these locations although, by the same token, there is also no evidence to demonstrate that Hendra is materially better in terms of connectivity than these sites.

In relation to accessibility, this is a wider matter for the Council to consider, but if a similar conclusion to connectivity is reached, then the Council is able to conclude that the Hendra site does not fail the sequential approach to site selection and other factors will need to be considered if a choice is to be made between competing proposals.

In relation to the need to make a choice between out of centre supermarket proposals in Truro, the assessment of quantitative need in the 2010 Cornwall Retail Study for additional convenience goods floorspace in Truro suggests that, in addition to the Waitrose/Taste of Cornwall commitment, there is likely to be expenditure capacity for one new supermarket in Truro up to 2031. This suggests that the Council may wish to make a choice between the Hendra supermarket and other proposals at MGF and WGF.

In relation to the impact of the proposed supermarket, we forecast the following financial impacts on Truro city centre:

- o a solus 7% impact on the convenience goods sector, with a cumulative impact of 17%;
- o a solus 2% impact on the comparison goods sector, with a cumulative impact of 7% impact;
- o a total solus retail impact of 2%, which rises to 8% when other commitments are taken into account.

In financial terms, the Hendra proposal has the smallest impact on the city centre out of the current three proposals. However, the difference is not significant but should be placed in the overall planning balance when considering how a choice (if applicable) should be made between the current proposals.

In deciding how these impacts will affect the health of Truro city centre we have taken into account the fact that the city centre is in a good state of health and is not reliant on convenience goods expenditure to maintain its role and status, albeit that convenience goods expenditure does contribute to an important mix of uses in the centre. We have also taken into account the potential trading overlap between the proposed retail floorspace and the city centre and have found that there will be some overlap, particularly in relation to comparison goods shopping. As a consequence, we have taken into account the need to control the proposed floorspace, particularly in relation to the size of the proposed supermarket and the number and size of the other Class A retail floorspace. As part of our assessment we have also noted that the proposed supermarket is unlikely to provide spin-off benefits for the city centre.

Taking all of these factors into account, it is our conclusion that the retail elements of the Hendra proposal will have an adverse impact upon the health of Truro city centre but its

contribution to the wider cumulative impact on the centre is unlikely to be significantly adverse (assuming suitable planning conditions can be imposed).

I trust that the contents of this letter provide you with sufficient information and advice. However, if you have any queries, or require additional information, please do not hesitate to contact me.

Yours sincerely

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

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

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TABLE 3: TOTAL RETAIL IMPACT OF HENDRA PROPOSAL ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to Hendra Proposal	Residual Turnover	Solus Impact of Hendra	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.1	£14.3	-7%	-17%
Comparison	£422.5	£23.5	£399.0	-6%	£7.7	£391.3	-2%	-7%
Total	£439.6	£25.2	£414.4	-6%	£8.8	£405.6	-2%	-8%

Notes:

- convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
- comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
- diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
- diversion to Hendra proposal based on GVA assessment

Appendix D:

GVA advice letter on cumulative impact 6th June 2014



Our ref:
Your ref:

6th June 2014

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BY E-MAIL

Dear Tim

Willow Green Farm, Hendra and Maiden Green Farm Proposals

Assessment of Cumulative Retail Impact

Introduction

Following the provision of our advice to Cornwall Council in relation to the individual retail impacts associated with the above three planning applications, you have asked me to provide advice in relation to cumulative impact matters and the issues surrounding the potential need to make a choice between these proposals.

From the outset, it is important to point out that this letter of advice is not designed to identify which, if any, application should be preferred above the others. Instead, it is designed to provide the Council with the following advice:

- o the consequences, in retail impact terms, for Truro city centre of approving more than one proposal; and
- o consideration of the factors which may point towards a choice, in retail terms, between these three proposals.

Cumulative Financial Impact on Truro city centre

Within my recent advice to the Council, I have outlined the individual impacts of the Maiden Green Farm ('MGF'), Willow Green Farm ('WGF') and Hendra proposals (considered cumulatively with exiting permissions to retail development elsewhere in Truro and in surrounding settlements) on Truro city centre. These impacts were expressed in

terms of the financial impact of each proposal on the Class A1 retail sector in Truro city centre and on the wider vitality and viability of the city centre.

In each case, the impact of the proposal was considered to be adverse but not so severe (on either a solus or cumulative basis) as to warrant a significant adverse impact.

The financial impact assessment for each proposal is attached to this letter within Tables 1-3 and summarised below.

Table A: individual impacts of Willow Green Farm, Maiden Green Farm and Hendra proposals on Truro City Centre

City Centre Retail Sector	Willow Green Farm Impacts on Truro City Centre		Maiden Green Farm Impacts on Truro City Centre		Hendra Impacts on Truro City Centre	
	Solus	Cumulative	Solus	Cumulative	Solus	Cumulative
Convenience	£1.0m (7%)	£2.7m (16%)	£1.1m (7%)	£2.8m (16%)	£1.1m (7%)	£2.8m (17%)
Comparison	£11.2m (3%)	£34.7m (8%)	£12.3m (3%)	£35.8m (8%)	£7.7m (2%)	£31.2m (7%)
Total Impact	£12.2m (3%)	£37.4m (9%)	£13.4m (3%)	£38.6m (9%)	£8.8m (2%)	£37.2m (8%)

Turning now to the increased cumulative impact of permitting more than one of the current three application proposals, I have assessed the following financial impact scenarios:

- Willow Green Farm and Maiden Green Farm
- Willow Green Farm and Hendra
- Maiden Green Farm and Hendra

The results are summarised in Table B below.

Table B: cumulative impacts of Willow Green Farm, Maiden Green Farm and Hendra proposals on Truro City Centre

City Centre Retail Sector	Willow Green Farm & Maiden Green Farm		Willow Green Farm & Hendra		Maiden Green Farm & Hendra	
	Solus	Cumulative	Solus	Cumulative	Solus	Cumulative
Convenience	£1.4m (9%)	£3.1m (18%)	£1.4m (9%)	£3.1m (18%)	£1.5m (9%)	£3.1m (18%)
Comparison	£17.6m (4%)	£41.1m (10%)	£14.1m (4%)	£37.6m (9%)	£15.0m (4%)	£38.5m (9%)
Total Impact	£19.0m (5%)	£44.2m (10%)	£15.5m (4%)	£40.7m (9%)	£16.4m (4%)	£41.6m (9%)

Table B shows that approving two of these proposals, in the different combinations above, will increase the financial and proportionate impact upon the city centre. The increases in convenience goods expenditure diversion will be smaller than the comparison goods expenditure diversion:

- For convenience goods, the impact range for one proposal is £1.0m-£1.1m (7%). The cumulative impact of range for two permissions in Truro would rise to £1.4m-£1.5m (9%).
- For comparison goods, the impact range for one proposal is £7.7m-£12.3m (2%-3%). The cumulative impact range for two permissions in Truro would rise to £14.1m-£17.6m (4%).
- In relation to the total cumulative level of trade diversion from Truro city centre (including other commitments) the convenience goods impact range for one proposal is 16%-17% and this rises to 18% for two proposals. For comparison, permitting one scheme would lead to an impact of 7%-8%, whilst the range for two proposals is 9%-10%.
- In financial terms, permitting one scheme alongside commitments would lead to a loss of circa £37m-£38m from the city centre. Permitting two schemes would lead to a loss of between £41m-£44m.

Taking these increasing levels of impacts, I now turn to the overall cumulative impact on Truro city centre and the potential to make a choice between individual proposals.

Overall Cumulative Impact (and is there a need to make a choice, in retail terms, between these three planning applications?)

In my opinion, in order to understand the true cumulative impact of approving more than one of the current retail proposals in Threemilestone, the following matters should be considered:

- Cumulative levels of retail impact;
- The scale of expenditure capacity to support new retail floorspace in Truro;
- Qualitative issues, including choice and competition; and
- The development plan strategy for the local area and other material planning considerations.

Cumulative levels of financial retail impact

As can be seen from the figures in Tables A and B, permitting more than one proposal will increase the financial pressure on the city centre. In proportionate terms, the increase between the solus and cumulative impact levels is not large (i.e. 2% to 3%) although in financial terms the difference is around £2m-£7m, primarily on the comparison goods sector.

Whilst the city centre is in good health at present, there is an on-going trend of granting planning permissions for new retail floorspace in the city and in surrounding settlements which is having an increasingly large financial impact on the city centre, particularly in relation to comparison goods shopping. Whilst the Council has given its reasons for granting these schemes, which will provide an expanded range of retail floorspace in other settlements across Cornwall (and in some instances stop some of the leakage from these settlements), the consequence is that Truro city centre will start to lose market share.

Granting more than one permission in the Threemilestone area will add to this pressure and I consider that a balance will need to be struck between the provision of additional floorspace outside of the city centre (and the choice and competition that this could bring) and the need to protect the health of the city centre.

In terms of the consequences for retailing in the city centre, the available data (taken from the Cornwall Retail Study 2010)¹ indicates the convenience goods sector has a mixed performance. The Co-op and other city centre convenience stores are trading higher than benchmark whilst the Marks & Spencer and Iceland stores are trading below benchmark. In my opinion, I consider that the estimated turnover for the Marks & Spencer is too low given attractiveness and popularity of that store.

Based upon the impacts of two of the current proposals plus the Waitrose/Taste of Cornwall scheme, the Co-op will remain above benchmark, the Iceland will see a worsening below benchmark performance and other city centre convenience stores will drop below benchmark levels. The reliability of the available data regarding the performance of the M&S store means that solid conclusions cannot be drawn about the future trading performance of that store.

The above analysis suggests to me that whilst the available evidence doesn't show a significant cause for concern, the convenience goods sector is now starting to see large levels of trade diversion and this is in relation to both the one proposal and two proposal scenarios. Therefore, in the same way that the Council will need to consider whether the impact of one new supermarket in Truro is outweighed by the positive impacts of providing a new district centre in Threemilestone, it will also have to consider whether the growing impact on the city centre associated with two new supermarkets is also outweighed by the issues surrounding two separate or adjoining district centre proposals.

Expenditure capacity

In relation to the amount of expenditure capacity available to support new retail floorspace in Truro, our recent advice letters have explained that there is a finite amount of 'surplus' convenience good expenditure to support new floorspace in the city. As set out in our advice on the WGF proposal, the following capacity is available after the Waitrose/Taste of Cornwall commitment is taken into account:

¹ Based upon a survey of shopping patterns in 2008

- Nil at 2014
- 0-1,000sq m net at 2021
- 400-1,800sq m net at 2026
- 1,000-2,700sq m at 2031.

This level of capacity is only able to support one of the proposed supermarkets and even on this basis, the level of capacity cannot cover all of the turnover of either the Hendra, WGF and MGF proposals. Therefore, permitting two schemes would be take the scale of new convenience goods floorspace well in excess of available capacity.

For comparison goods floorspace, the level of assessed capacity in the 2010 retail study is greater and therefore of less concern. However, a balance must still need to be struck between the growing level of new comparison goods floorspace in Threemilestone and opportunities to provide new floorspace in the city centre such as at the Pydar Street scheme.

As you'll be aware, the test of 'need' has been removed from national planning policy, although I consider that it can still form a material planning consideration.

Qualitative issues

In relation to the qualitative aspects of convenience goods retail floorspace provision, the 2010 retail study found that there is a reasonable range of provision in Truro but there were opportunities for growth, particularly in relation to an expanded urban area. The study went on to note that there was logic in providing a district centre in the same location as new residential development, along it did not give a specific location². Notwithstanding the grant of planning permission for the Waitrose/Taste of Cornwall scheme on the eastern edge of the city, I continue to believe that there is logic and merit in providing a new district centre. Indeed, given that there are proposals for significant levels of housing to the north of the A390, then a district centre in this location is reasonable.

However, this 'need' is, in my opinion, only relevant to one new district centre. Given the scale of the existing urban area, along with the scale of new house-building, I not consider that there is a particular requirement for more than one new centre.

The adopted development brief

In light of the contents and advice in the 2010 retail study, along with, I assume, other sensible strategic planning considerations, the adopted development brief for land to the north of the A390 includes provision for one single new district centre. As a consequence, any desire to permit more than one of these proposals, all of which claim directly or

² Due to the abandonment of the AAP preparation process and the need not to prejudge the plan-making process

indirectly to provide the proposed centre, could well be seen as being in conflict with the aims and aspirations of the brief.

In addition, consideration should also be given by the Council to the consequences of permitting more than one of these schemes, in terms of the aspiration to deliver a new district centre which includes the development brief's required ingredients and a centre which can provide a high quality destination the focus for the local area. On this issue, I have a concern that two rival planned centres could severely dilute the quality of centre that is provided and not provide all of the necessary ingredients in one location.

In addition, I am also concerned over deliverability issues. For example, it is likely that the new supermarket element of a centre will help to fund the delivery of other parts of the centre and also the delivery of wider infrastructure. In my experience, this funding will be dependent upon the financial offer from the supermarket offer, which in turn will be influenced by the competition it faces from other stores. If two new stores are permitted, viability may be affected and thus lead to problems with the delivery of the necessary infrastructure in the local area. Whilst I do not have any detailed evidence on this issue, it is a potential concerning issue and should be placed within the wider balancing exercise.

Conclusions

Having regards to the above factors, I do not consider that there is one single factor which points to the need to choose just one of these proposals. Instead, this is a balancing exercise, with all factors contributing to an overall outcome. When this exercise is undertaken, it is clear to me that all factors point to the need to approve just one proposal and that proposal being the focus for one properly planned high quality new district centre in Threemilestone.

For the avoidance of doubt these factors are:

- o The quantitative need for just one new supermarket up to 2031;
- o The lack of a reasonable qualitative choice/competition case for granting more than one supermarket/district centre in Threemilestone;
- o My concern that granting permission for more than one proposal could affect delivery of necessary infrastructure;
- o The growing level of adverse impact upon Truro city centre which is not counter-balanced by other sufficiently weighty positive factors such as choice and competition; and
- o The fact that the development brief for Threemilestone envisages just one new district centre in the local area.

As noted from the outset of this letter, it is not appropriate for GVA to recommend which proposal should be chosen given the wider range of factors which require consideration.

However, I trust that you will find this letter useful in the justification for needing to choose between these three applications. If you have any queries regarding the content of this letter, or require additional advice, please do not hesitate to contact me.

Yours sincerely

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

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

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TABLE 1: TOTAL RETAIL IMPACT OF WILLOW GREEN FARM SUPERMARKET ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to Willow Green Farm	Residual Turnover	Solus Impact of Willow Green Farm	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.0	£14.4	-7%	-16%
Comparison	£422.5	£23.5	£399.0	-6%	£11.2	£387.8	-3%	-8%
Total	£439.6	£25.2	£414.4	-6%	£12.2	£402.2	-3%	-9%

Notes:

convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
diversion to Willow Green Farm based on GVA assessment

TABLE 2: TOTAL RETAIL IMPACT OF MAIDEN GREEN FARM ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to Maiden Green Farm	Residual Turnover	Solus Impact of Maiden Green Farm	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.1	£14.3	-7%	-16%
Comparison	£422.5	£23.5	£399.0	-6%	£12.3	£386.7	-3%	-8%
Total	£439.6	£25.2	£414.4	-6%	£13.4	£401.0	-3%	-9%

Notes:

- convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
- comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
- diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
- diversion to Maiden Green Farm based on GVA assessment

TABLE 3: TOTAL RETAIL IMPACT OF HENDRA PROPOSAL ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to Hendra Proposal	Residual Turnover	Solus Impact of Hendra	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.1	£14.3	-7%	-17%
Comparison	£422.5	£23.5	£399.0	-6%	£7.7	£391.3	-2%	-7%
Total	£439.6	£25.2	£414.4	-6%	£8.8	£405.6	-2%	-8%

Notes:

- convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
- comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
- diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
- diversion to Hendra proposal based on GVA assessment

TABLE 4: TOTAL CUMULATIVE RETAIL IMPACT OF WILLOW GREEN AND MAIDEN GREEN PROPOSALS ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to WGF &MGF	Residual Turnover	Solus Impact of WGF & MGF	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.4	£14.0	-9%	-18%
Comparison	£422.5	£23.5	£399.0	-6%	£17.6	£381.4	-4%	-10%
Total	£439.6	£25.2	£414.4	-6%	£19.0	£395.4	-5%	-10%

Notes:

- convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
- comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
- diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
- diversion based on GVA assessment

TABLE 5: TOTAL CUMULATIVE RETAIL IMPACT OF WILLOW GREEN AND HENDRA PROPOSALS ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to WGF & Hendra	Residual Turnover	Solus Impact of WGF & Hendra	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.4	£14.0	-9%	-18%
Comparison	£422.5	£23.5	£399.0	-6%	£14.1	£384.9	-4%	-9%
Total	£439.6	£25.2	£414.4	-6%	£15.5	£398.9	-4%	-9%

Notes:

- convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
- comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
- diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
- diversion based on GVA assessment

TABLE 6: TOTAL CUMULATIVE RETAIL IMPACT OF MAIDEN GREEN AND HENDRA PROPOSALS ON TRURO CITY CENTRE

Retail Sector	Pre-Impact Turnover	Diversion to Commitments	Residual Turnover after Commitments	Impact (%) of Commitments	Diversion to MGF & Hendra	Residual Turnover	Solus Impact of MGF & Hendra	Cumulative Impact
Convenience	£17.1	£1.7	£15.4	-10%	£1.4	£14.0	-9%	-18%
Comparison	£422.5	£23.5	£399.0	-6%	£15.0	£384.0	-4%	-9%
Total	£439.6	£25.2	£414.4	-6%	£16.4	£398.0	-4%	-9%

Notes:

- convenience turnover levels for city centre taken from Quod assessment and including re-distributed former Somerfield expenditure
- comparison turnover of city centre based on Quod estimate, minus 20% for non-centre trading.
- diversion to commitments based on GVA advice to Cornwall Council in relation to these and other retail proposals
- diversion based on GVA assessment

Appendix E:

GVA Advice letter 11th August 2014



Our ref:
Your ref:

11th August 2014

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Principal Development Officer
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BY E-MAIL

Dear Tim

Willow Green Farm, Hendra and Maiden Green Farm Proposals

As requested, I write to provide advice in relation to the supermarket elements of the above three planning applications. In addition to our advice on the solus retail impacts of each scheme, plus the cumulative retail impacts associated with two new supermarkets being delivered, you have asked for advice on the issues associated with the grant of permission for all three supermarket proposals.

In our view, the key issue here is deliverability. At present, the Truro/Threemilestone area has two large supermarkets: Sainsburys and Tesco. It also has an Aldi discount store plus smaller Iceland and Co-op stores in the city centre, plus a foodhall within the Marks & Spencer store. Planning permission has been granted for a Waitrose store on the eastern edge of the city and work is now underway to construct that store. On the basis that the supermarket elements of the Hendra, Maiden Green Farm and Willow Green Farm proposals are restricted to provide that use then there are only two national grocery operators who are not currently represented who could potentially occupy these units: Morrisons and ASDA. I have excluded Lidl as, whilst they are likely to have an active requirement for a store in Truro/Threemilestone, they will not occupy a supermarket of the sizes proposed.

As a consequence of the above, there are theoretically two potential scenarios for these three proposals:

1. delivery of two out of the three proposals (for ASDA and Morrisons); or
2. delivery of all three, including new stores for ASDA and Morrisons and either the relocation of an existing operator or a second store for an existing operator.

The first scenario is certainly possible given that both ASDA and Morrisons have stated requirements for the Truro area. The retail impacts associated with this scenario are covered within our recent cumulative impact advice letter. However, whilst it is a possible outcome, there is no certainty that the grant of planning permission for two or more supermarkets will definitely result in two new stores being delivered. This is due to the finite amount of retail expenditure in the local area and the proximity of these proposals. In addition, delivery of two new stores could be affected by the characteristics of the schemes granted planning permission. For example, if two permissions are granted and one scheme is compromised in terms of, for example, a multi-level store/car park, then this scheme may well be less attractive than a scheme without these characteristics.

For the second scenario to succeed, there would be a need for Sainsburys, Tesco or Waitrose to either relocate or take a second store in Truro/Threemilestone. In relation to Waitrose, the only option is for a second store given that they are currently building a store at Union Hill/Newquay Road. This is extremely unlikely given these circumstances and also the amount of floorspace that Waitrose require in any given catchment area. Sainsburys are extremely unlikely to require a second large supermarket given the proximity of their existing store. Equally, a relocation is not a realistic option given the relative size of the existing store and the three proposals. The final option is Tesco although they are unlikely to relocate from their current position adjacent to the city centre to a location on the western side of the city adjacent to another two (new) stores of a similar size. For similar reasons, a second store for Tesco does not appear to us to be a commercially viable possibility.

Therefore, in light of the above, we do not consider that there is the realistic potential for all three current new supermarkets to be delivered. There is the potential, should planning permission be granted for more than one of these applications, for two new supermarkets to be delivered although even this is not a certainty given the level of available expenditure and the proximity and characteristics of the three proposals.

I trust that the contents of this letter meet your current requirements. However, if you have any queries, or require additional information, then please do not hesitate to contact me.

Yours sincerely



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

Appendix F:

GVA advice letter 11th September 2014



Our ref:
Your ref:

11th September 2014

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BY E-MAIL

Dear Tim

Willow Green Farm, Hendra and Maiden Green Farm Proposals

Further to our recent discussions, I write, as promised, regarding the above three planning applications. In particular, I write with an update to our advice provided to Cornwall Council on the 6th June 2014 which dealt with the issue of choosing between these proposals.

Our June advice considered four factors, which concluded that, when all these factors were considered, one proposal should be chosen by the Council. We have re-visited these factors, plus the overall consideration, and set out our views below.

The first factor was the cumulative impact of more than one scheme on Truro city centre. the advice concluded that the financial impact on the city centre would increase although it is important to note that a significant adverse impact was not claimed. Instead, we recommended that the Council consider whether the growing impact on the city centre associated with two proposals is outweighed by the issues surrounding two separate or adjoining district centre proposals. On this issue, our advice remains unchanged.

The next two factors were expenditure capacity and qualitative issues. Both have historically formed part of the assessment of need and, whilst the June advice letter confirms that 'need' is not a current planning policy test, we took these issues into account as a material consideration. We have re-considered this issue in light of the recent Rushden Lakes call-in decision in which the Inspector and the Secretary of State made specific comments regarding the use of 'need' and 'scale' issues in development management decisions. We have had particular regard to paragraph 14 of the

Secretary of State's decision letter and paragraphs 8.37-8.42 of the conclusions. These seek to downplay the relevance of 'need' and 'scale' in development management decisions and therefore this has led us to place less weight on the issues of expenditure capacity and qualitative need as material considerations in this case.

The final issue is the adopted Development Brief. Whilst we have taken account of the content of the Brief, particularly in relation to the need for one new district centre, we acknowledge that it is for the Local Planning Authority to judge the weight to be attributed to it in reaching a decision on the acceptability or otherwise of the proposals taking into account our advice. We nevertheless agree that the decision of the Council to identify one new district centre in the Brief reflects sound planning principles.

Therefore, in light of the considerations outlined above, whilst there may be good planning reasons why one or more of these proposals cannot be supported, the retail planning issues do not, in our opinion, dictate that a choice must be made for only one scheme.

I trust that the contents of this letter meet your current requirements. However, if you have any queries, or require additional information, then please do not hesitate to contact me.

Yours sincerely

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

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

Appendix G:

Updated impact assessment

TABLE 13a: TRADE DRAW TO WILLOW GREEN SUPERMARKET (CONVENIENCE GOODS FLOORSPACE)

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	TOTAL
Turnover (£m)																											£40.9
Trade draw % £m	0.2% £0.1	0.1% £0.0	0.3% £0.1	0.2% £0.1	1.5% £0.6	0.8% £0.3	0.8% £0.3	0.8% £0.3	17.3% £7.1	49.1% £20.1	14.0% £5.7	10.0% £4.1	2.0% £0.8	2.1% £0.9	0.5% £0.2	0.2% £0.1	0.1% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	100.0% £40.9	

Notes: turnover based on floorspace data from planning application and ASDA company average sales density.

ETUDE/COMITE	1	2	3	4	5	6	7	8	9	10	11
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Notes: pattern of trade diversion based on GVA assessment

Notes:

TABLE 13c: £m TRADE DIVERSION, WILLOW GREEN

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	Total (€m)
FALMOUTH & PENRYN																											
Island, Berkeley Way, Falmouth	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Berkeley Way, Falmouth	€0.0	€0.0	€0.0	€0.0	€0.1	€0.0	€0.0	€0.0	€0.1	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.2
Isco, Kilgrew Street, Falmouth	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Iscl, Falmouth Road, Falmouth	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Iscl, Penryn	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Iscl, Penryn	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Isco, S & Spencer, Falmouth	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Isco, Penryn, Falmouth	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Other	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Sub-total	€0.0	€0.0	€0.0	€0.0	€0.4	€0.0	€0.0	€0.0	€0.1	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.8
PERNANCE																											
Co-op, Pernance	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Wharfedale, Pernance	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Wharfedale, Pernance	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Morrisons, Pernance	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.1
Sainsbury's, Pernance	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Wharfedale, Pernance	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Other	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Sub-total	€0.1	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.2
CAMDFORD																											
Co-op, Camdford	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Shop, Camdford	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Shop, Camdford	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Sub-total	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
LOOE																											
Co-op, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0
Island, Looe	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0	€0.0				

Notes: trade diversion calculated using % trade diversion (Table 13b) and trade draw (Table 13a)

TABLE 13d: CONVENIENCE GOODS RETAIL IMPACT OF WILLOW GREEN FARM PROPOSAL, 2019

	2019 PRE-IMPACT STUDY AREA DERIVED TURNOVER	TOTAL 2019 PRE-IMPACT TURNOVER	DIVERSION TO WAITROSE	DIVERSION TO OTHER COMMITMENTS	RESIDUAL TURNOVER AFTER COMMITMENTS	IMPACT OF COMMITMENTS	DIVERSION TO WILLOW GREEN FARM	RESIDUAL TURNOVER	IMPACT SOLUS	IMPACT CUMULATIVE
TRURO										
Waitrose					£21.2		£2.5	£18.75	-11.6%	
Co-op, Boscowen Street, Truro	£5.1	£5.40	£0.4	£0.10	£4.94	-8.4%	£0.3	£4.66	-5.8%	-13.8%
Marks & Spencer, Truro	£5.5	£5.77	£0.5	£0.10	£5.20	-10.0%	£0.4	£4.80	-7.6%	-16.8%
Iceland, Truro	£1.8	£1.94	£0.1	£0.00	£1.86	-4.1%	£0.1	£1.76	-5.3%	-9.1%
Aldi, Truro	£23.8	£25.18	£2.4	£0.45	£22.31	-11.4%	£5.2	£17.06	-23.5%	-32.2%
Sainsbury's, Truro	£44.4	£46.84	£8.3	£2.00	£36.56	-21.9%	£15.5	£21.08	-42.3%	-55.0%
Tesco, Truro	£25.8	£27.22	£5.3	£1.50	£20.39	-25.1%	£9.7	£10.67	-47.7%	-60.8%
other	£5.3	£5.62	£0.4	£0.40	£4.83	-14.0%	£0.4	£4.46	-7.7%	-20.6%
Sub-total										
Truro City Centre	£17.7	£18.7	£1.3	£0.6	£16.8	-10.1%	£1.2	£15.7	-6.8%	-16.3%

Notes:

Pre-impact turnover based on data in Cornwall Retail Study Update.
Total turnover assumes that expenditure inflow is equivalent to 15.3% of study area derived turnover.
Diversion to Waitrose / Taste of Cornwall based on GVA assessment.
Diversion to other commitments based upon Hendra and Langarth commitments accommodating food retail sales.
Diversion to WGF taken from Table 13c.

TABLE 13e: TOTAL RETAIL IMPACT OF WILLOW GREEN 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 WILLOW GREEN FARM	RESIDUAL TURNOVER	IMPACT SOLUS CUMULATIVE	
TRURO									
Convenience	£17.7	£18.7	£1.9	£16.8	-10.1%	£1.2	£15.7	-6.8%	-16.3%
Comparison	£469.3	£495.6	£40.9	£467.8	-5.6%	£10.5	£457.3	-2.2%	-7.7%
Total	£487.1	£514.3	£42.8	£484.6	-5.8%	£11.7	£472.9	-2.4%	-8.1%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update. Expenditure inflow assumed to be 15.7% of study area derived turnover.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in Truro, Hayle, Newquay and St Austell on Truro city centre.

Diversion from Truro city 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.

TABLE 14a: TRADE DRAW TO MAIDEN GREEN SUPERMARKET (CONVENIENCE GOODS FLOORSPACE)

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	TOTAL
Turnover (£m)																											£43.6
Trade draw %	0.2%	0.1%	0.3%	0.2%	1.5%	0.8%	0.8%	0.8%	17.3%	49.1%	14.0%	10.0%	2.0%	2.1%	0.5%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
£m	£0.1	£0.0	£0.1	£0.1	£0.7	£0.3	£0.3	£0.3	£7.5	£21.4	£6.1	£4.4	£0.9	£0.9	£0.2	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£43.6

Notes: turnover based on planning application information and ASDA company average sales density.

TABLE 14b: % TRADE DIVERSION, MAIDEN GREEN

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26
FALMOUTH & PENNYN																										
Eastend, Bickley Vale, Falmouth	0.0%	0.0%	0.0%	0.0%	1.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sainsbury's, Falmouth	0.0%	0.0%	0.0%	0.0%	14.3%	0.0%	0.0%	0.0%	1.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
tesco, Kilgrew Street, Falmouth	0.0%	0.0%	0.0%	0.0%	3.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
lidl, Falmouth Road, Falmouth	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asda, Penryn	0.0%	0.0%	2.4%	2.6%	28.6%	2.3%	4.7%	2.9%	2.4%	0.4%	0.2%	0.2%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
lidl, Penryn	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
marks & spencer, Falmouth	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
tesco (express), Falmouth	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total	0.0%	0.0%	2.4%	3.1%	62.8%	2.3%	4.7%	2.9%	3.1%	0.5%	0.2%	0.2%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PENZANCE																										
Co-op, Penzance	8.0%	0.2%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Eastend, Whitford, Penzance	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
lidl, Penzance	7.3%	0.0%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Monitors, Penzance	27.1%	20.4%	18.5%	2.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Sainsbury's, Penzance	14.6%	13.0%	13.0%	0.2%	0.0%	3.0%	20.4%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
tesco, Penzance	36.2%	16.0%	11.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.0%	
other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Sub-total	95.1%	30.2%	44.6%	2.4%	0.0%	3.0%	20.4%	0.0%	0.3%	0.0%	0.1%	0.0%	0.1%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%
CAMELFORD																										
Co-op, Camelford	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
local shops, Camelford	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Star, Market Place, Camelford	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
LOOE																										
Co-op, Looe	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
CALLINGTON																										
tesco, Callington	0.0%	0.2%	0.1%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.2%	20.3%	56.8%	2.8%	0.0%	0.0%	0.0%	0.4%	0.0%
local shops, Callington	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
lidl, Fore Street, Callington	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total	0.0%	0.2%	0.1%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.2%	20.3%	56.8%	2.8%	0.0%	0.0%	0.0%	0.4%	0.0%
LISEKARD																										
Asda, Liskeard	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	17.0%	4.8%	3.6%	0.8%	0.0%	0.0%	0.2%	0.0%	0.0%
Monitors, Liskeard	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	44.4%	20.9%	1.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Co-op, Barras Street, Liskeard	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	61.4%	25.6%	5.1%	0.8%	0.0%	0.0%	0.2%	0.0%	0.0%
WADDERIDGE																										
Co-op, Waddebridge	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
lidl, Waddebridge	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
tesco, Waddebridge	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HELSTON																										
Co-op, Helston	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
lidl, Helston	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sainsbury's, Helston	0.0%	0.0%	1.0%	26.3%	3.5%	1.4%	0.0%	0.4%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
tesco, Helston	0.0%	0.0%	0.0%	89.6%	2.0%	0.4%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sub-total	0.0%	0.0%	1.0%	85.8%	2.5%	2.0%	0.0%	0.4%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
CAMBORNE, POOL & REDRUTH																										
Asda, Church Street, Camborne	0.0%	0.8%	2.2%	0.0%	0.2%	16.0%	1.0%	2.6%	0.9%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Eastend, Treloarway St, Camborne	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
tesco, Wesley Street, Camborne	0.0%	0.0%	0.6%	0.5%	0.4%	5.4%	15.7%	9.4%	2.9%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
lidl, Pool	0.0%	0.0%	0.6%	0.5%	0.4%	5.4%	15.7%	9.4%	2.9%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Monitors, Pool	0.0%	0.0%	0.6%	0.6%	0.0%	9.3%	24.0%	13.9%	4.2%	0.2%	0.6															

TABLE 14c: £m TRADE DIVERSION, MAIDEN GREEN

[illegible]

Notes: trade diversion calculated using % trade diversion (Table 14b) and trade draw (Table 14a)

TABLE 14d: CONVENIENCE GOODS RETAIL IMPACT OF MAIDEN GREEN FARM PROPOSAL, 2019

	2019 PRE-IMPACT STUDY AREA DERIVED TURNOVER	TOTAL 2019 PRE-IMPACT TURNOVER	DIVERSION TO WAITROSE	DIVERSION TO OTHER COMMITMENTS	RESIDUAL TURNOVER AFTER COMMITMENTS	IMPACT OF COMMITMENTS	DIVERSION TO MAIDE GREEN FARM	RESIDUAL TURNOVER	IMPACT SOLUS	IMPACT CUMULATIVE
TRURO										
Waitrose					£21.2		£2.6	£18.59	-12.3%	
Co-op, Boscowen Street, Truro	£5.1	£5.40	£0.4	£0.10	£4.94	-8.4%	£0.3	£4.64	-6.2%	-14.1%
Marks & Spencer, Truro	£5.5	£5.77	£0.5	£0.10	£5.20	-10.0%	£0.4	£4.78	-8.1%	-17.3%
Iceland, Truro	£1.8	£1.94	£0.1	£0.00	£1.86	-4.1%	£0.1	£1.76	-5.6%	-9.4%
Aldi, Truro	£23.8	£25.18	£2.4	£0.45	£22.31	-11.4%	£5.6	£16.72	-25.0%	-33.6%
Sainsbury's, Truro	£44.4	£46.84	£8.3	£2.00	£36.56	-21.9%	£16.5	£20.09	-45.1%	-57.1%
Tesco, Truro	£25.8	£27.22	£5.3	£1.50	£20.39	-25.1%	£10.3	£10.05	-50.7%	-63.1%
other	£5.3	£5.62	£0.4	£0.40	£4.83	-14.0%	£0.4	£4.43	-8.2%	-21.1%
Sub-total										
Truro City Centre	£17.7	£18.7	£1.3	£0.6	£16.8	-10.1%	£1.2	£15.6	-7.3%	-16.7%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update.
Total turnover assumes that expenditure inflow is equivalent to 15.3% of study area derived turnover.
Diversion to Waitrose / Taste of Cornwall based on GVA assessment.
Diversion to other commitments based upon Hendra and Langarth commitments accommodating food retail sales.
Diversion to MGF taken from Table 14c.

TABLE 14e: TOTAL RETAIL IMPACT OF MAIDEN GREEN 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 MAIDEN GREEN FARM	RESIDUAL TURNOVER	IMPACT SOLUS	IMPACT CUMULATIVE
TRURO									
Convenience	£17.7	£18.7	£1.9	£16.8	-10.1%	£1.2	£15.6	-7.3%	-16.7%
Comparison	£469.3	£495.6	£40.9	£467.8	-5.6%	£11.9	£455.9	-2.5%	-8.0%
Total	£487.1	£514.3	£42.8	£484.6	-5.8%	£13.1	£471.5	-2.7%	-8.3%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update. Expenditure inflow assumed to be 15.7% of study area derived turnover.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in Truro, Hayle, Newquay and St Austell on Truro city centre.

Diversion from Truro city 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.

TABLE 15a: TRADE DRAW TO HENDRA SUPERMARKET (CONVENIENCE GOODS FLOORSPACE)

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	TOTAL
Turnover (£m)																											£44.6
Trade draw % £m	0.2% £0.1	0.1% £0.0	0.3% £0.1	0.2% £0.1	1.5% £0.7	0.8% £0.4	0.8% £0.4	0.8% £0.4	17.3% £7.7	49.1% £21.9	14.0% £6.2	10.0% £4.5	2.0% £0.9	2.1% £1.0	0.5% £0.2	0.2% £0.1	0.1% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	100.0% £44.6	

Notes: turnover based on floorspace data provided with the applicant's documents and ASDA's company average sales density.

TABLE 15b: % TRADE DIVERSION, HENDRA

[illegible]

Notes: pattern of trade diversion based on GVA assessment

TABLE 15c: £m TRADE DIVERSION, HENDRA

SOURCE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	Total (€M)
FALMOUTH & PENRYN																											
Island, Baskerville Way, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Killgrew Street, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Aldi, Falmouth Road, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Penryn	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, St James's Park, Penryn	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Spenner, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Penryn, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.4	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
PERNANCE																											
Co-op, Pernance	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Wharfedale, Pernance	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Morrisons, Pernance	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Barnibury's, Pernance	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
CAMERFORD																											
Co-op, Camerford	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Local shops, Camerford	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, St James's Park, Penryn	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
LOOE																											
Co-op, Looe	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Wadebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
CALINGTON																											
Tesco, Calington	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Local shops, Calington	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Fore Street, Scarth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
LEAKEARD																											
Aldi, Leakeard	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Morrisons, Leakeard	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Co-op, Barrow Street, Leakeard	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
WADDERBIDGE																											
Co-op, Waddebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Waddebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Waddebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
HILTON																											
Co-op, Hilton	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Aldi, Hilton	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Hilton	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Aldi, Hilton	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Aldi, Penryn	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
CAMBRIDGE, POOL & DEBURN																											
Aldi, Church Street, Cambridge	£0.0	£0.0	£0.0</																								

Notes: trade diversion based on % trade diversion (Table 15b) and trade draw (Table 15a)

TABLE 15d: CONVENIENCE GOODS RETAIL IMPACT OF HENDRA PROPOSAL, 2019

	2019 PRE-IMPACT STUDY AREA DERIVED TURNOVER	TOTAL 2019 PRE-IMPACT TURNOVER	DIVERSION TO WAITROSE	DIVERSION TO OTHER COMMITMENTS	RESIDUAL TURNOVER AFTER COMMITMENTS	IMPACT OF COMMITMENTS	DIVERSION TO HENDRA	RESIDUAL TURNOVER	IMPACT SOLUS	IMPACT CUMULATIVE
TRURO										
Waitrose					£21.2		£2.7	£18.53	-12.6%	
Co-op, Boscowen Street, Truro	£5.1	£5.40	£0.4	£0.05	£4.99	-7.5%	£0.3	£4.68	-6.3%	-13.3%
Marks & Spencer, Truro	£5.5	£5.77	£0.5	£0.05	£5.25	-9.1%	£0.4	£4.82	-8.2%	-16.6%
Iceland, Truro	£1.8	£1.94	£0.1	£0.00	£1.86	-4.1%	£0.1	£1.75	-5.7%	-9.6%
Aldi, Truro	£23.8	£25.18	£2.4	£0.25	£22.51	-10.6%	£5.7	£16.79	-25.4%	-33.3%
Sainsbury's, Truro	£44.4	£46.84	£8.3	£1.00	£37.56	-19.8%	£16.9	£20.69	-44.9%	-55.8%
Tesco, Truro	£25.8	£27.22	£5.3	£0.75	£21.14	-22.3%	£10.6	£10.55	-50.1%	-61.3%
other	£5.3	£5.62	£0.4	£0.20	£5.03	-10.5%	£0.4	£4.62	-8.0%	-17.7%
Sub-total										
Truro City Centre	£17.7	£18.7	£1.3	£0.3	£17.1	-8.5%	£1.3	£15.9	-7.3%	-15.2%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update.
Total turnover assumes that expenditure inflow is equivalent to 15.3% of study area derived turnover.
Diversion to Waitrose / Taste of Cornwall based on GVA assessment.
Diversion to other commitments based upon Langarth commitment accommodating food retail sales.
Diversion to Hendra taken from Table 15c.

TABLE 15e: TOTAL RETAIL IMPACT OF HENDRA 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 HENDRA	RESIDUAL TURNOVER	IMPACT SOLUS	IMPACT CUMULATIVE
TRURO									
Convenience	£17.7	£18.7	£1.6	£17.1	-8.5%	£1.3	£15.9	-7.3%	-15.2%
Comparison	£469.3	£495.6	£40.9	£467.8	-5.6%	£7.2	£460.5	-1.5%	-7.1%
Total	£487.1	£514.3	£42.5	£484.9	-5.7%	£8.5	£476.4	-1.8%	-7.4%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update. Expenditure inflow assumed to be 15.7% of study area derived turnover.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in Truro, Hayle, Newquay and St Austell on Truro city centre.

Diversion from Truro city 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.

TABLE 16a: TRADE DRAW TO WEST LANGARTH SUPERMARKET (CONVENIENCE GOODS FLOORSPACE)

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	TOTAL
Turnover (£m)																											£37.1
Trade draw																											
%	0.2%	0.1%	0.3%	0.2%	1.5%	0.8%	0.8%	0.8%	17.3%	49.1%	14.0%	10.0%	2.0%	2.1%	0.5%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
£m	£0.1	£0.0	£0.1	£0.1	£0.6	£0.3	£0.3	£0.3	£6.4	£18.2	£5.2	£3.7	£0.7	£0.8	£0.2	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£37.1

Notes: turnover calculated using floorspace data from planning application documents and ASDA company average sales density.

TABLE 16b: % TRADE DIVERSION, WEST LANGARTH

Notes: pattern of trade diversion based on GVA assessment

Notes

TABLE 16c: £m TRADE DIVERSION, WEST LANGARTH

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	Total (£m)
FALMOUTH & PENRYN																											
Kentland, Baskerville Way, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.2
Tesco, Killgrew Street, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Aldi, Falmouth Road, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Penryn	£0.0	£0.0	£0.0	£0.0	£0.2	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, S & Spencer, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Perry's, Falmouth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.3	£0.0	£0.0	£0.0	£0.2	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.7
PENZANCE																											
Co-op, Penzance	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Whearfield, Penzance	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Morrisons, Penzance	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sainsbury's, Penzance	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
CARDIFF																											
Co-op, Cardiff	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Local shops, Cardiff	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Co-op, Cardiff, Penrice, Cardiff	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
LEO																											
Co-op, Lleo	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Whearfield, Lleo	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
CALINGTON																											
Tesco, Calington	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Local shops, Calington	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Star, Fore Street, Calington	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
LISKEARD																											
Aldi, Liskeard	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Morrisons, Liskeard	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Co-op, Barras Street, Liskeard	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
WADDESBIDGE																											
Co-op, Waddebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Waddebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Waddebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
HELSTON																											
Co-op, Helston	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Aldi, Helston	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Co-op, Helston	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Tesco, Helston	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Aldi, Penryn	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Sub-total	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
CAMBORNE, POOL & REDRUTH																											
Aldi, Church Street, Camborne	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1
Redruth, Treloarson St, Camborne	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Aldi, Pool	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.2	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.3
Co-op, Pool	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.4
Tesco Extra, Pool	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.6	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0							

Notes: trade diversion calculated using % trade diversion (Table 16b) and trade draw (Table 16a)

TABLE 16d: CONVENIENCE GOODS RETAIL IMPACT OF WEST LANGARTH PROPOSAL, 2019

	2019 PRE-IMPACT STUDY AREA DERIVED TURNOVER	TOTAL 2019 PRE-IMPACT TURNOVER	DIVERSION TO WAITROSE	DIVERSION TO OTHER COMMITMENTS	RESIDUAL TURNOVER AFTER COMMITMENTS	IMPACT OF COMMITMENTS	DIVERSION TO WEST LANGARTH	RESIDUAL TURNOVER	IMPACT SOLUS	IMPACT CUMULATIVE
TRURO										
Waitrose					£21.2		£2.2	£18.98	-10.5%	
Co-op, Boscowen Street, Truro	£5.1	£5.40	£0.4	£0.10	£4.94	-8.4%	£0.3	£4.68	-5.2%	-13.3%
Marks & Spencer, Truro	£5.5	£5.77	£0.5	£0.10	£5.20	-10.0%	£0.4	£4.84	-6.9%	-16.2%
Iceland, Truro	£1.8	£1.94	£0.1	£0.00	£1.86	-4.1%	£0.1	£1.77	-4.8%	-8.6%
Aldi, Truro	£23.8	£25.18	£2.4	£0.45	£22.31	-11.4%	£4.8	£17.56	-21.3%	-30.3%
Sainsbury's, Truro	£44.4	£46.84	£8.3	£2.00	£36.56	-21.9%	£14.0	£22.54	-38.3%	-51.9%
Tesco, Truro	£25.8	£27.22	£5.3	£1.50	£20.39	-25.1%	£8.8	£11.59	-43.2%	-57.4%
other	£5.3	£5.62	£0.4	£0.40	£4.83	-14.0%	£0.3	£4.49	-7.0%	-20.0%
Sub-total										
Truro City Centre	£17.7	£18.7	£1.3	£0.6	£16.8	-10.1%	£1.0	£15.8	-6.2%	-15.7%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update.
Total turnover assumes that expenditure inflow is equivalent to 15.3% of study area derived turnover.
Diversion to Waitrose / Taste of Cornwall based on GVA assessment.
Diversion to other commitments based upon Hendra commitment accommodating food retail sales.
Diversion to West Langarth taken from Table 16c.

TABLE 16e: TOTAL RETAIL IMPACT OF WEST LANGARTH 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 WEST LANGARTH	RESIDUAL TURNOVER	IMPACT SOLUS	IMPACT CUMULATIVE
TRURO									
Convenience	£17.7	£18.7	£1.9	£16.8	-10.1%	£1.0	£15.8	-6.2%	-15.7%
Comparison	£469.3	£495.6	£40.9	£467.8	-5.6%	£19.5	£448.3	-4.2%	-9.5%
Total	£487.1	£514.3	£42.8	£484.6	-5.8%	£20.5	£464.1	-4.2%	-9.8%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update. Expenditure inflow assumed to be 15.7% of study area derived turnover.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in Truro, Hayle, Newquay and St Austell on Truro city centre.

Diversion from Truro city 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.

TABLE 18a: TRADE DRAW TO WEST LANGARTH NON-FOOD RETAIL UNITS

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	TOTAL
Turnover (£m)																											£18.6
Trade draw % £m	1.0% £0.2	1.0% £0.2	2.0% £0.4	3.0% £0.6	8.0% £1.5	3.0% £0.6	5.0% £0.9	4.0% £0.7	10.0% £1.9	21.0% £3.9	9.0% £1.7	10.0% £1.9	7.5% £1.4	9.0% £1.7	2.0% £0.4	2.0% £0.4	2.0% £0.4	0.5% £0.1	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	0.0% £0.0	100.0% £18.6

Notes: turnover calculated using floorspace data provided by the applicant and a sales density of £5,000/sq m

TABLE 18b: TRADE DIVERSION (%) TO WEST LANGARTH NON-FOOD UNITS, 2019

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26
Falmouth & Penryn	1.2%	0.1%	1.5%	5.7%	30.3%	1.0%	1.4%	1.4%	3.1%	2.5%	0.7%	0.2%	0.1%	0.4%	0.9%	0.1%	0.4%	0.7%	0.0%	0.0%	0.3%	0.0%	2.1%	0.9%	0.0%	0.0%
St Austell	0.0%	0.2%	0.0%	0.2%	0.0%	0.0%	0.0%	0.3%	0.1%	0.4%	0.4%	6.1%	4.6%	35.1%	32.6%	10.8%	5.0%	9.0%	0.7%	0.4%	1.9%	1.3%	0.0%	0.0%	0.0%	0.0%
Truro	37.9%	59.3%	47.8%	75.8%	66.3%	72.1%	68.9%	73.3%	77.7%	94.3%	93.4%	92.0%	77.5%	60.5%	59.2%	70.0%	83.8%	41.7%	23.6%	21.5%	42.6%	65.4%	25.4%	7.8%	4.4%	12.9%
Penzance	51.4%	21.6%	28.6%	6.1%	0.0%	2.6%	0.9%	0.6%	0.3%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Bodmin	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.2%	2.0%	12.2%	2.6%	7.3%	0.2%	0.2%	2.2%	12.6%	1.1%	0.2%	0.0%	0.1%
Cambourne	0.2%	0.5%	2.0%	0.6%	0.1%	6.1%	2.1%	1.2%	0.5%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.2%	0.0%	0.0%	0.2%	0.0%
Hayle	4.7%	11.4%	12.4%	2.0%	0.3%	4.9%	2.7%	1.5%	1.6%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Wadebridge	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.8%	2.9%	0.0%	0.2%	0.0%	0.0%	2.6%	0.0%	0.2%	0.0%	0.0%
Launceston	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.1%	4.3%	18.0%	2.6%	5.1%	0.0%	2.6%	4.2%
Redruth	0.9%	0.5%	0.5%	0.8%	0.4%	3.6%	10.5%	13.6%	8.8%	0.1%	1.3%	0.0%	0.2%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.7%	2.3%	0.0%	0.0%	0.0%
Liskeard	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.1%	0.1%	0.2%	0.6%	0.2%	14.6%	3.8%	3.2%	0.8%	0.6%	0.4%	0.2%	0.7%	0.1%
Newquay	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	1.6%	0.0%	14.3%	0.6%	0.0%	0.4%	1.1%	0.3%	0.0%	0.0%	0.0%	0.3%	0.0%	0.1%	0.0%	0.0%
Looe	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Saltash	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	7.4%	0.2%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%
Camelford	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%
Padstow	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Callington	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.7%	9.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
St Ives	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Torpoint	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Pool	0.3%	2.1%	3.4%	3.4%	0.2%	7.3%	10.8%	5.9%	5.8%	0.7%	0.6%	0.0%	0.2%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	2.2%
Bude	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	1.6%	17.6%	0.0%	0.0%	0.8%
Helston	0.0%	0.0%	0.0%	2.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
Other Stores	0.6%	0.6%	0.4%	0.4%	0.2%	0.4%	0.3%	0.2%	0.4%	0.3%	0.3%	0.2%	0.3%	0.5%	1.8%	1.4%	0.5%	14.4%	39.8%	40.9%	18.5%	3.2%	27.0%	64.4%	64.8%	56.3%
Internet / Mail Order	2.6%	2.7%	3.4%	3.0%	2.1%	2.0%	2.5%	1.9%	1.7%	1.3%	1.4%	1.4%	2.2%	2.4%	2.9%	3.2%	3.1%	9.8%	20.0%	19.0%	15.1%	8.1%	18.9%	25.6%	27.2%	23.3%

Notes: pattern of trade diversion based on GVA assessment.

TABLE 18c: TRADE DIVERSION (£m) TO WEST LANGARTH NON-FOOD UNITS, 2019

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	TOTAL
Falmouth & Penryn	£0.0	£0.0	£0.0	£0.0	£0.5	£0.0	£0.0	£0.0	£0.1	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.7
St Austell	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.1	£0.6	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£1.0
Truro	£0.1	£0.1	£0.2	£0.4	£1.0	£0.4	£0.6	£0.5	£1.4	£3.7	£1.6	£1.7	£1.1	£1.0	£0.2	£0.3	£0.3	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£14.7
Penzance	£0.1	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.3
Bodmin	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1
Cambourne	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1
Hayle	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.2
Wadebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Launceston	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Redruth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.1	£0.2	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.4
Liskeard	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Newquay	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.2	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.2
Looe	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Saltash	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Camelford	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Padstow	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Callington	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
St Ives	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Torpoint	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Pool	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.4
Bude	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Helston	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Other Stores	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1
Internet / Mail Order	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.4

Notes: trade diversion calculated using % trade diversion (Table 18b) and trade draw (Table 18a)

TABLE 19a: TRADE DRAW TO TRURO FC NON-FOOD RETAIL UNITS

STORE/CENTRE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	TOTAL
Turnover (£m)																											£67.4
Trade draw %	3.0%	1.0%	2.0%	4.0%	9.0%	4.0%	4.0%	4.0%	9.0%	19.4%	8.0%	6.0%	9.0%	9.0%	2.0%	2.0%	2.0%	0.8%	0.3%	0.1%	0.5%	0.6%	0.3%	0.0%	0.0%	0.0%	100.0%
£m	£2.0	£0.7	£1.3	£2.7	£6.1	£2.7	£2.7	£2.7	£6.1	£13.1	£5.4	£4.0	£6.1	£6.1	£1.3	£1.3	£1.3	£0.5	£0.2	£0.1	£0.3	£0.4	£0.2	£0.0	£0.0	£0.0	£67.4

Notes: turnover based on data provided in TCFC retail impact assessment.

TABLE 19b: TRADE DIVERSION (%) TO TRURO FC NON-FOOD UNITS, 2019

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26
Falmouth & Penryn	1.2%	0.1%	1.5%	5.7%	30.3%	1.0%	1.4%	1.4%	3.1%	2.5%	0.7%	0.2%	0.1%	0.4%	0.9%	0.1%	0.4%	0.7%	0.0%	0.0%	0.3%	0.0%	2.1%	0.9%	0.0%	0.0%
St Austell	0.0%	0.2%	0.0%	0.2%	0.0%	0.0%	0.0%	0.3%	0.1%	0.4%	0.4%	6.1%	4.6%	35.1%	32.6%	10.8%	5.0%	9.0%	0.7%	0.4%	1.9%	1.3%	0.0%	0.0%	0.0%	0.0%
Truro	37.9%	59.3%	47.8%	75.8%	66.3%	72.1%	68.9%	73.3%	77.7%	94.3%	93.4%	92.0%	77.5%	60.5%	59.2%	70.0%	83.8%	41.7%	23.6%	21.5%	42.6%	65.4%	25.4%	7.8%	4.4%	12.9%
Penzance	51.4%	21.6%	28.6%	6.1%	0.0%	2.6%	0.9%	0.6%	0.3%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Bodmin	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.2%	2.0%	12.2%	2.6%	7.3%	0.2%	0.2%	2.2%	12.6%	1.1%	0.2%	0.0%	0.1%
Cambourne	0.2%	0.5%	2.0%	0.6%	0.1%	6.1%	2.1%	1.2%	0.5%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.2%	0.0%	0.0%	0.2%	0.0%
Hayle	4.7%	11.4%	12.4%	2.0%	0.3%	4.9%	2.7%	1.5%	1.6%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Wadebridge	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.8%	2.9%	0.0%	0.2%	0.0%	0.0%	2.6%	0.0%	0.2%	0.0%	0.0%
Launceston	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.1%	4.3%	18.0%	2.6%	5.1%	0.0%	2.6%	4.2%
Redruth	0.9%	0.5%	0.5%	0.8%	0.4%	3.6%	10.5%	13.6%	8.8%	0.1%	1.3%	0.0%	0.2%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.7%	2.3%	0.0%	0.0%	0.0%
Liskeard	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.1%	0.1%	0.2%	0.6%	0.2%	14.6%	3.8%	3.2%	0.8%	0.6%	0.4%	0.2%	0.7%	0.1%
Newquay	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	1.6%	0.0%	14.3%	0.6%	0.0%	0.4%	1.1%	0.3%	0.0%	0.0%	0.0%	0.3%	0.0%	0.1%	0.0%	0.0%
Looe	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Saltash	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	7.4%	0.2%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%
Camelford	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%
Padstow	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Callington	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.7%	9.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
St Ives	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Torpoint	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Pool	0.3%	2.1%	3.4%	3.4%	0.2%	7.3%	10.8%	5.9%	5.8%	0.7%	0.6%	0.0%	0.2%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	2.2%
Bude	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	1.6%	17.6%	0.0%	0.0%	0.8%
Helston	0.0%	0.0%	0.0%	2.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
Other Stores	0.6%	0.6%	0.4%	0.4%	0.2%	0.4%	0.3%	0.2%	0.4%	0.3%	0.3%	0.2%	0.3%	0.5%	1.8%	1.4%	0.5%	14.4%	39.8%	40.9%	18.5%	3.2%	27.0%	64.4%	64.8%	56.3%
Internet / Mail Order	2.6%	2.7%	3.4%	3.0%	2.1%	2.0%	2.5%	1.9%	1.7%	1.3%	1.4%	1.4%	2.2%	2.4%	2.9%	3.2%	3.1%	9.8%	20.0%	19.0%	15.1%	8.1%	18.9%	25.6%	27.2%	23.3%

Notes: pattern of trade diversion based on GVA assessment.

TABLE 19c: TRADE DIVERSION (£m) TO TRURO FC NON-FOOD UNITS, 2019

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	19	19	20	21	22	23	24	25	26	TOTAL
Falmouth & Penryn	£0.0	£0.0	£0.0	£0.2	£1.8	£0.0	£0.0	£0.0	£0.2	£0.3	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£2.8
St Austell	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.2	£0.3	£2.1	£0.4	£0.1	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£3.5
Truro	£0.8	£0.4	£0.6	£2.0	£4.0	£1.9	£1.9	£2.0	£4.7	£12.3	£5.0	£3.7	£4.7	£3.7	£0.8	£0.9	£1.1	£0.2	£0.0	£0.0	£0.1	£0.3	£0.1	£0.0	£0.0	£0.0	£51.4
Penzance	£1.0	£0.1	£0.4	£0.2	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£1.9
Bodmin	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.2	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.4
Cambourne	£0.0	£0.0	£0.0	£0.0	£0.0	£0.2	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.4
Hayle	£0.1	£0.1	£0.2	£0.1	£0.0	£0.1	£0.1	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.8
Wadebridge	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1
Launceston	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1
Redruth	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.3	£0.4	£0.5	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£1.5
Liskeard	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1
Newquay	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.0	£0.9	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£1.0
Looe	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Saltsash	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Camelford	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Padstow	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Callington	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
St Ives	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Torpoint	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Pool	£0.0	£0.0	£0.0	£0.1	£0.0	£0.2	£0.3	£0.2	£0.4	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£1.3
Bude	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0
Helston	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1
Other Stores	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.0	£0.1	£0.1	£0.0	£0.1	£0.0	£0.1	£0.0	£0.0	£0.0	£0.6
Internet / Mail Order	£0.1	£0.0	£0.0	£0.1	£0.1	£0.1	£0.1	£0.0	£0.1	£0.2	£0.1	£0.1	£0.1	£0.1	£0.0	£0.0	£0.0	£0.1	£0.0	£0.0	£0.1	£0.0	£0.0	£0.0	£0.0	£0.0	£1.5

Notes: trade diversion calculated using % trade diversion (Table 19b) and trade draw (Table 19a).

TABLE 19d: TOTAL RETAIL IMPACT OF TCFC 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 TCFC	RESIDUAL TURNOVER	IMPACT SOLUS CUMULATIVE	
TRURO									
Convenience	£17.7	£18.7	£1.9	£16.8	-10.1%	£0.0	£16.8	0.0%	-10.1%
Comparison	£469.3	£495.6	£40.9	£467.8	-5.6%	£47.3	£420.5	-10.1%	-15.2%
Total	£487.1	£514.3	£42.8	£484.6	-5.8%	£47.3	£437.3	-9.8%	-15.0%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update. Expenditure inflow assumed to be 15.7% of study area derived turnover.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in Truro, Hayle, Newquay and St Austell on Truro city centre.

Diversion from Truro city 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.

TABLE 20a: TOTAL RETAIL IMPACT OF WILLOW GREEN AND MAIDEN GREEN PROPOSALS, 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 WG + MG	RESIDUAL TURNOVER	IMPACT SOLUS	IMPACT CUMULATIVE
TRURO									
Convenience	£17.7	£18.7	£1.9	£16.8	-10.1%	£1.4	£15.4	-8.3%	-17.6%
Comparison	£469.3	£495.6	£40.9	£467.8	-5.6%	£17.0	£450.8	-3.6%	-9.0%
Total	£487.1	£514.3	£42.8	£484.6	-5.8%	£18.4	£466.2	-3.8%	-9.4%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update. Expenditure inflow assumed to be 15.7% of study area derived turnover.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in Truro, Hayle, Newquay and St Austell on Truro city centre.

Diversion from Truro city 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.

TABLE 20b: TOTAL RETAIL IMPACT OF WILLOW GREEN AND HENDRA PROPOSALS, 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 WG + HENDRA	RESIDUAL TURNOVER	IMPACT SOLUS CUMULATIVE	
TRURO									
Convenience	£17.7	£18.7	£1.9	£16.8	-10.1%	£1.4	£15.4	-8.3%	-17.6%
Comparison	£469.3	£495.6	£40.9	£467.8	-5.6%	£13.5	£454.3	-2.9%	-8.3%
Total	£487.1	£514.3	£42.8	£484.6	-5.8%	£14.9	£469.7	-3.1%	-8.7%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update. Expenditure inflow assumed to be 15.7% of study area derived turnover.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in Truro, Hayle, Newquay and St Austell on Truro city centre.

Diversion from Truro city 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.

TABLE 20c: TOTAL RETAIL IMPACT OF MAIDEN GREEN AND HENDRA PROPOSALS, 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 HENDRA + MG	RESIDUAL TURNOVER	IMPACT SOLUS CUMULATIVE	
TRURO									
Convenience	£17.7	£18.7	£1.6	£17.1	-8.5%	£1.4	£15.7	-8.2%	-16.0%
Comparison	£469.3	£495.6	£40.9	£467.8	-5.6%	£14.4	£453.4	-3.1%	-8.5%
Total	£487.1	£514.3	£42.5	£484.9	-5.7%	£15.8	£469.1	-3.3%	-8.8%

Notes:

Pre-impact turnover taken from Cornwall Retail Study Update. Expenditure inflow assumed to be 15.7% of study area derived turnover.

Diversion to commitments based upon GVA's assessment of the trading impact of commitments in Truro, Hayle, Newquay and St Austell on Truro city centre.

Diversion from Truro city 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.

Appendix H:

Study area plan for 2014 household shopping survey

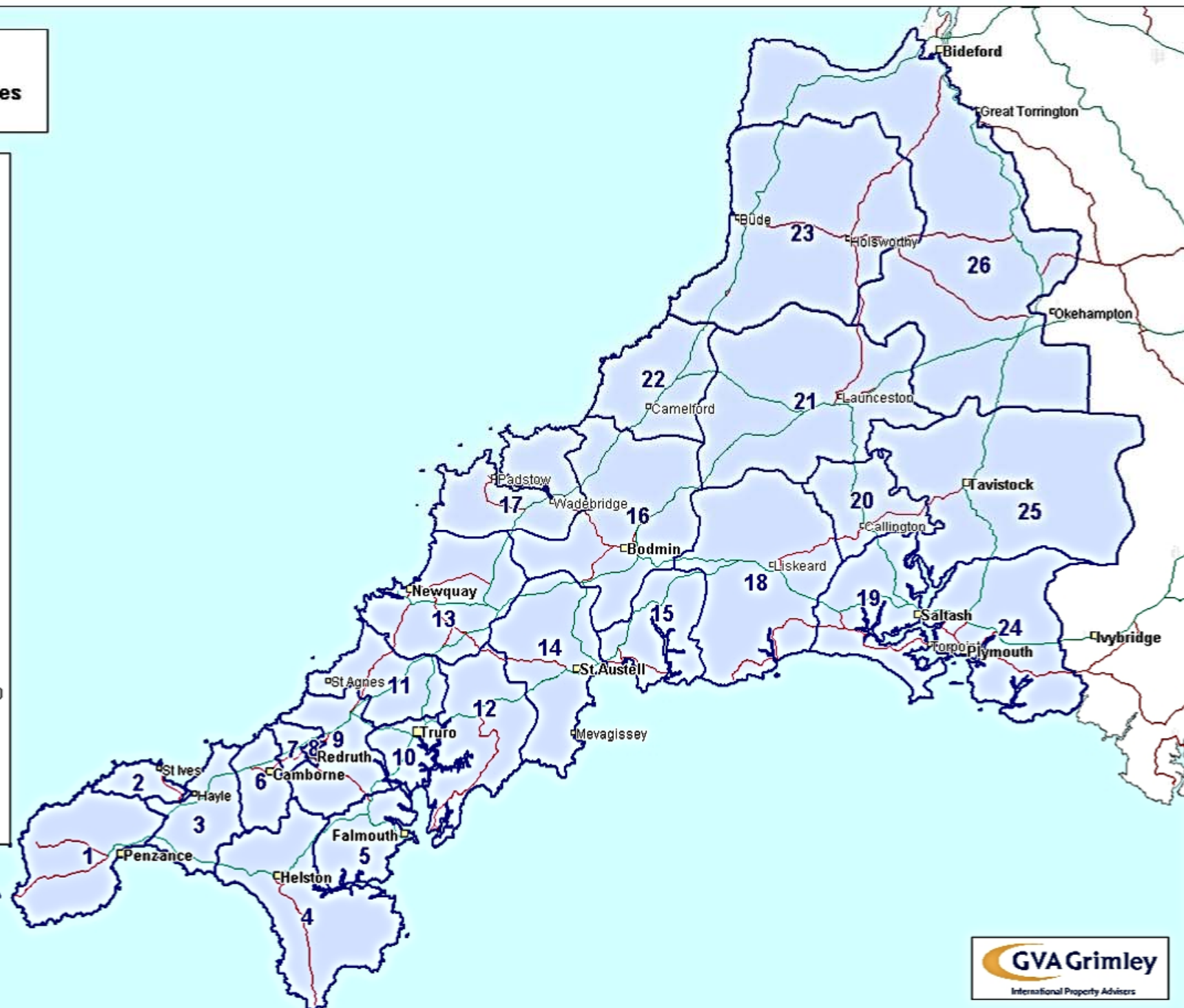
Cornwall Retail Study **Study Area & Survey Zones**

KEY

- Study Area
- Household Survey Zone

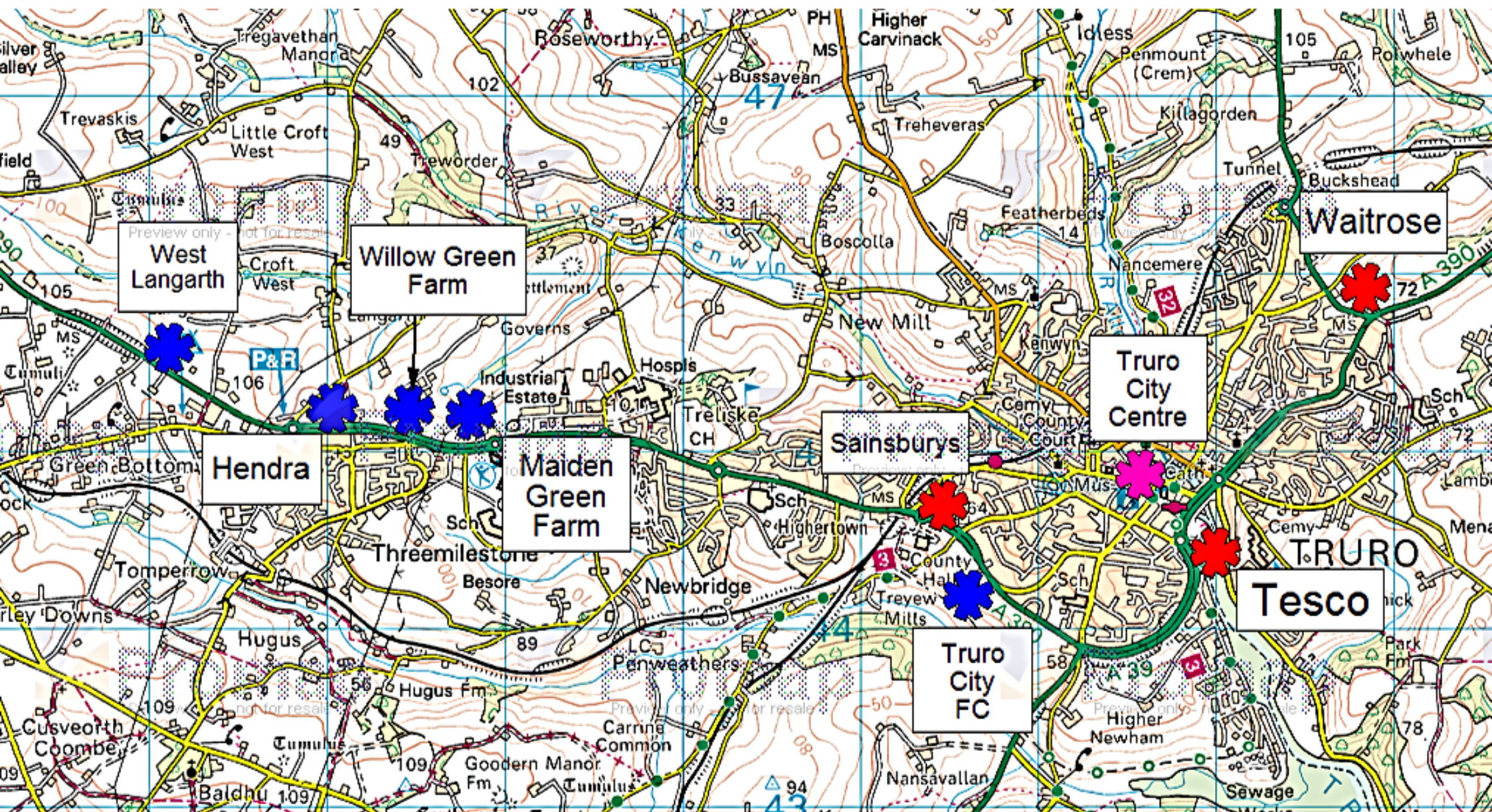
Zone Postal Sectors

1	TR18 2/3/4/5, TR19 6/7, TR20 8
2	TR26 1/2/3
3	TR17 0, TR20 9, TR27 4/5/6
4	TR12 6/7, TR13 0/8/9
5	TR10 8/9, TR11 2/3/4/5
6	TR14 0/7/8/9
7	TR15 3, TR16 4
8	TR15 1/2
9	TR3 7, TR4 8, TR16 5/6
10	TR1 1/2/3, TR3 6
11	TR4 9, TR5 0, TR6 0
12	TR2 4/5
13	TR8 4/5, TR7 1/2/3, TR9 6
14	PL25 3/4/5, PL26 6/7/8
15	PL22 0, PL23 1, PL24 2
16	PL30 3/4/5, PL31 1/2
17	PL27 6/7, PL28 8, PL29 3
18	PL13 1/2, PL14 3/4/5/6
19	PL10 1, PL11 2/3, PL12 4/5/6
20	PL17 7/8, PL18 9
21	PL15 7/8/9, PL16 0
22	PL32 9, PL33 9, PL34 0, PL35 0
23	EX22 6/7, EX23 0/8/9
24	PL1, PL2, PL3, PL4, PL5, PL6, PL7, PL8, PL9
25	PL19 0/8/9, PL20 6/7
26	EX20 3/4, EX21 5, EX38 8, EX39 5/6



Appendix I:

**Plan showing location of current application sites, existing and
committed supermarkets and Truro city centre**



Appendix J:

Comparison between the requirements of the A390 Development Brief and the main town centre use elements of the Willow Green Farm, Maiden Green Farm, Hendra and West Langarth proposals

Appendix J: comparison between the component parts of the Maiden Green Farm, Willow Green Farm, West Langarth and Hendra 'district centre' proposals

District Centre Component	Willow Green Farm	Maiden Green Farm	Hendra	West Langarth
New retail floorspace, including a single medium sized foodstore	Foodstore only, no additional A1 retail floorspace	Foodstore and additional convenience/comparison goods floorspace	Foodstore only, no additional A1 retail floorspace	Foodstore and additional comparison goods floorspace (similar in scale to foodstore use)
Community use	Yes, community building to be provided.	Yes	Yes	Yes, although it would appear that the use of this facility will be associated with outdoor recreation use only
Doctors surgery/health centre	No	Yes	Class D1 uses are proposed, although description of development appears to favour crèche rather than health centre.	Class D1 uses are proposed, although description of development appears to favour crèche rather than health centre.
Public house/restaurant	Yes	No specific public house ¹ , but separate restaurant facilities are provided (see below)	Yes	Yes, potentially, as part of the A3/4/5 floorspace.
Children's nursery	We understand that there could be available space within the community floorspace to accommodate a crèche.	Yes	Yes	Class D1 uses are proposed, although there is no certainty that such a use will be provided.
Parking for mobile library unit	Unclear from submitted application, partially due to its outline nature	Shown on indicative layout plan	Shown on indicative layout plan	Unclear from submitted application, partially due to its outline nature
Accommodation for small businesses and services to complement the main uses	No other proposed uses in WGF district centre	Café/bar/restaurant uses proposed within MGF district centre. The applicant is also proposing a large amount of commercial/office floorspace adjacent to the proposed district centre.	Café/bar/restaurant uses proposed. B1 unit also proposed, although unclear whether this can be provided as well as community space.	No other separate proposed uses, although allowance for 929sq m (if not taken-up by public house) could allow other services to be provided. We do not classify the large scale comparison goods floorspace as 'accommodation for small businesses and services'.

¹ Removed from scheme during determination