

20/00474/APP – Demolish existing service station and garage and erect retail unit, light industrial unit and 2no. blocks of residential flats at Hopeman Service Station, Forsyth Street, Hopeman

1.0 Background

- 1.1 Bidwells were previously instructed by Moray Council to review and comment upon the Retail Planning Statement (RPS) prepared by North Planning & Development on behalf of Springfield Properties which had been provided in support of the above planning application (20/00474/APP).
- 1.2 In response to our September 2020 submission, North Planning & Development have provided further comments in their letter to Moray Council dated 18th September 2020.
- 1.3 We have therefore been instructed by Moray Council to provide our further observations on the latest response. This response therefore focuses on the comments set out in the letter of 18th September 2020 but should be read alongside the contents of our earlier report.

2.0 Retail Policy Impacts

- 2.1 In response to the first observation it is fair to say that all parties have previously recognised that Hopeman does not have an identified retail centre that is shown in the MLDP 2020 settlement map or listed in Table 6.
- 2.2 In our previous response we did not indicate that the principle of retail development was acceptable, rather we simply pointed out the policy requirements of the MLDP2020, including the need for further quantitative and qualitative assessments.
- 2.3 It is noted that the further response from North Planning & Development continues to assert that simply because there is an estimated surplus of available convenience expenditure within the catchment area, then this means that there must automatically be capacity for the proposed retail unit to then derive 100% of its total turnover from the expenditure that is currently being spent outwith the catchment.
- 2.4 However, an assessment of the overall expenditure leakage from a catchment only forms one part of any retail assessment.
- 2.5 As we pointed out previously, the prospect of the retail unit generating 100% of its turnover from leaked expenditure is an overly simplistic and unrealistic assumption principally because the proposed store is unlikely to serve all of the convenience needs of the whole community and be able to retain all of the existing leaked expenditure. Not all shoppers from within the catchment can be expected to switch their entire current weekly shops from Asda or Tesco in Elgin/Forres (or any other stores) to a local Co-op store in Hopeman. The proposed Co-op store is also being promoted as a small shop intended to primarily serve the day to day convenience needs of a local community rather than a store that would compete with the major supermarkets. It would not provide an offer that would remove all of the current leakage of expenditure per head from within

the catchment. It cannot therefore be considered as a like for like comparison as it would compete with other similar sized stores that are already within the catchment. As such turnover for the Co-op unit would in part be derived from expenditure diverted from the existing local shops.

- 2.6 There remains no analysis on any potential trade diversions to the proposed Co-op store from the existing local stores in Harbour Street in Hopeman, or an assessment of any impact on other stores located elsewhere within the catchment e.g. the shop in Duffus, or indeed on any of the town centres. A quantitative assessment would be expected to include an analysis of the potential trade diversion from these existing stores/centres with a corresponding assessment on levels of potential impact. The current assumption that there would be 0% trade diversion from any of the existing stores is clearly unrealistic.
- 2.7 The lack of a detailed quantitative assessment also has the potential to raise qualitative impact issues. Even relatively small trade diversions from the existing stores within the catchment could lead to significant qualitative impacts with a reduction in the footfall on Harbour Street and ultimately the potential closure of existing shops thus adversely impacting on the character and identity of Hopeman. As previously noted, one of the Development Strategy/Placemaking objectives for Hopeman as set out in the MLDP 2020 is to safeguard the distinctive character of the village. Negative trade diversion from the existing convenience stores to help facilitate the turnover of the proposed Co-op store could result in the closure of any of the existing stores to the detriment of the distinctive character of the village.
- 2.8 In addition to the above retail policy impacts we previously commented on the industrial/business land use allocation that covers the majority of the proposed application site. The relevant business policy (DP5 d) from the MLDP 2020 makes specific reference to preventing non confirming uses such as retail and/or housing uses from being developed on such sites. In addition, we also previously highlighted that the adopted MLDP 2020 includes specific reference to the Hopeman Caravan Park (site T1 – Tourism) as being capable of providing ancillary services appropriate to tourist development including uses such as a shop in the village. Given the Caravan Park's location, an additional shop at this location in Hopeman would have the potential to contribute positively to the level of footfall along Harbour Street.
- 2.9 North Planning & Development make a point of comparing the interpretation of Policy DP7 c) with the wording of Policy R3 from the replaced MLDP 2015 and provide detailed comment on how a planning application at Lhanbryde in 2015 was assessed favourably against that now superseded policy R3.
- 2.10 However, it is evident that the wording of the two policies are subtly different. The accompanying justification/notes for Policy DP7 also highlight that retail uses are not principally employment uses, and allocation of land for employment/business does not imply it will be acceptable as a retail development site.
- 2.11 It's also difficult to make direct comparisons to the Co-op application at Lhanbryde. Lhanbryde whilst similar in terms of population within the catchment is very different in terms of character. The new Co-op store is also located opposite the existing shops on the main road through the village where the potential for linked shopping trips would be far greater compared to the situation in Hopeman. Lhanbryde has a Keystore which includes the Post Office, butcher and pharmacy. Harbour Street in Hopeman is different in character with a mix of convenience stores and cafes/takeaway. The Co-op store in Lhanbryde is also likely to be different from their standard new build unit as it was designed to reflect the building it replaced so has more traditional

proportions. The Hopeman application therefore has to be considered in its own context and merits.

3.0 Floorspace Split

- 3.1 In terms of a further analysis on the split between trading and non-trading floorspace, we note from a cross reference with the submitted drawings that the planning application forms confirm the following detailed breakdown;

Gross Floorspace

Retail Unit Floorspace	372 sq m
Starter Unit Floorspace	111 sq m
Total Floorspace	483 sq m

Net Floorspace

Retail Unit Floorspace	232 sq m
Starter Unit Floorspace	111 sq m
Total Floorspace	343 sq m

Non Trading Floorspace

Retail Unit Floorspace	138 sq m
Starter Unit Floorspace	0 sq m
Total Floorspace	138 sq m

*note that the retail unit net and non-trading floorspace figures = 370 sq m and not 372 sqm as stated on the forms or on the drawings.

- 3.2 The floorspace figures set out above are confirmed on the amended ground floor plan for the retail unit and also on the amended ground floor plan for the starter unit (both plans dated 13 July 2020). The further response from North Planning & Development reiterates that the retail element of the Hopeman application proposal is 260 sq m sales/trading space and 112 sq m back of house storage = total of 372 sq m gross floor space.
- 3.3 Although the RPS and the further response have assessed that the proposal equates to a 70/30 split in the sales/non trading space, this is not reflected by what is stated on the planning application forms or shown on the proposed layout drawings. The details set out in para 3.1 above show that there would be a 62/38 split in the sales/non trading floorspace (excluding any additional yard/external plant space proposed).
- 3.4 For the reasons set out in our previous response we maintain the view that whether the split proposed is either 62/38 or 70/30, this would be considered low for this type of retail unit and could easily become a higher sales to non-trading floorspace ratio depending on the identity of the operator, with resulting potential increased turnover for the store and also the potential for further trade diversion from existing stores (which to date has not been quantified). Future control over the potential split in the internal layout could if necessary be covered and enforced by a suitably worded condition on any approval.
- 3.5 Although the application highlights that the Co-op would be the intended operator of the retail unit, again this cannot be guaranteed in perpetuity, without either strict conditions or a planning obligation in place.

4.0 Conclusion

- 4.1 For the reasons set out above, the conclusions contained within our original Opinion therefore remain unaltered in that we consider the potential quantitative and qualitative impacts of the proposed retail unit have not been fully evaluated.