

South West St Helier Visioning Framework Proposal

Retail Planning Policy Statement

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1. Introduction

Instruction

- 1.1 Jersey Development Company has instructed Nexus Planning to address the retail planning policy considerations associated with an outline planning application¹ for the demolition of existing structures and the phased construction of a mixed-use development (comprising up to 984 dwellings and up to 31,125 sq.m of non-residential floorspace) on land located within the south-western part of St Helier town centre.
- 1.2 The application site measures 11.55 hectares and is situated between the Esplanade and St Aubin's Bay in the centre. The full extent of the red line boundary is illustrated on the application drawings and whilst the predominant current land use is surface car parking, the site also accommodates public gardens, leisure, and recreational uses (including a swimming pool, multi-screen cinema, and food and drink uses).
- 1.3 The description of development is as follows:

'Outline planning application (with all matters reserved). Demolish existing structures. Phased construction of new development comprising up to 984 residential units with basement parking; up to 31,125 sq.m of non-residential floorspace comprising retail, commercial, social infrastructure, leisure, arts and cultural facilities, public and private open spaces, new pedestrian and vehicular access; other associated landscaping, infrastructure and highways alterations including relocation of the slipway and La Fregate, land reclamation and flood defence measures.'
- 1.4 The outline planning application was submitted in December 2021. Discussions with the planning department and statutory consultees took place across 2022. In response to feedback received, revisions have been made to the scheme, including a reduction in the height of the gateway building, amendments to the principal pedestrian crossing, and the incorporation of La Fregate Café into the scheme following its listing. The application has now been 'called in' for determination by the Minister and will be reviewed by an independent Planning Inspector at a Public Inquiry which will open on 15 May 2023.
- 1.5 The purpose of this Retail Planning Policy Statement is to address retail and town centre planning policy matters to assist the Minister in his consideration of the planning application. As outlined in greater detail below, the Bridging Island Plan (adopted in March 2022) identifies that retail proposals providing more than 200 sq.m of gross floorspace which are located outside of St Helier's core retail area should comply with the sequential and impact tests. The key purpose of this report is to demonstrate the compliance of the proposal with the requirements of both of these retail policy tests.

Proposal and Context

- 1.6 The application is the first part of a two-stage planning process and will be followed by subsequent reserved matters applications for individual phases, which will confirm the final form and appearance of the buildings and the detailed site arrangements.
- 1.7 The submitted proposed development comprises:
 - up to 984 residential units (comprising a mix of one, two and three bed units);
 - up to 1,296 sq.m gross retail floorspace (Class A);
 - up to 6,568 sq.m gross leisure floorspace (Class H);

¹ Reference PP/2021/1969.

- up to 2,478 gross arts, cultural and community floorspace (Class G and Class I);
- up to 16,755 sq.m gross office floorspace (Class C);
- up to 3,004 sq.m gross food and beverage floorspace (Class B/Class M); and
- up to 1,024 sq.m gross social infrastructure.

1.8 It is anticipated that the proposed retail floorspace will include a convenience store, general small-scale retail units, kiosks, and a gift store (albeit end operators are not prescribed at this outline planning stage).

1.9 The commercial floorspace is an integral part of the application scheme, creating interest and activity at ground floor level and ensuring that local needs can be met on-site in a sustainable manner.

Structure of Report

1.10 The sole focus of this report is the proposal's compliance with retail planning policy. As such, it should be read in conjunction with the Planning Statement, prepared by MS Planning and dated April 2023, which addresses general planning policy matters.

1.11 The remainder of the Retail Planning Policy Statement is structured as follows:

- Section 2 confirms the retail and town centre planning policy of relevance to the application proposal;
- Section 3 considers the needs which arise from the wider proposal and how this informs the application of the sequential approach to development;
- Section 4 considers the proposal in respect of its compliance with the impact policy test; and
- Section 5 provides our summary of the proposal's compliance with retail planning policy requirements.

2. Retail and Town Centres Planning Policy Context

2.1 We identify below the principal planning policies of relevance to retail and town centre matters.

Planning Policy Framework

2.2 The Bridging Island Plan was adopted by the Minister, following endorsement by the States Assembly in March 2022. It provides a comprehensive review of the policy position identified by the 2011 Island Plan, but across a shorter five-year timeframe (2021 to 2025) due to the uncertainties associated with longer-term data assumptions in the context of Covid-19 and other economic conditions.

2.3 The outline planning application was prepared and submitted when the 2011 Island Plan provided the statutory policy position. However, the proposal's evolution is reflective of the Bridging Island Plan which now provides the relevant determination framework.

2.4 Volume 2 of the Island Plan provides commentary on the different places within the Island and sets a context to how different objectives will be applied. Given the strategic focus on the town of St Helier, the Island Plan also expands its commentary to set out more detailed aspirations as a strategic 'Plan for Town' focusing on the quality of the St Helier urban environment under a series of themes. These comprise:

- a Vibrant Town – focusing on livening and enhancing the residential community and improving the public realm;
- a Growing Town – seeking to integrate proposed development into the existing built form and introducing new public infrastructure; and
- a Sustainable Town – seeking to restore and protect the town's important existing fabric and adapt to climate change.

2.5 Volume 3 of the Island Plan relates to 'General Development'. Under the first heading 'Economy', the Plan recognises the need to support sustainable economic growth and productivity, particularly following Brexit and the Covid-19 pandemic. The supporting text at page 151 of the Island Plan confirms that the main retail and town centre location in Jersey is St Helier town centre, which serves as the Island's principal year-round shopping attraction and primary retail hub.

2.6 To support St Helier town centre, the Island Plan defines a core retail area and a wider town centre boundary. The commercial development proposed by the application is located outside of the core retail area but is within the town centre boundary. Non-retail commercial floorspace fully accords with the Plan's policies given that the site is 'in centre' with reference to the town centre boundary.

2.7 In this regard, the supporting text at page 151 of the Plan identifies that:

'Maintaining and enhancing the vitality of St Helier town centre will require support for the protection and provision of both retail and non-retail uses, which attract islanders and visitors to the town centre, and which generate activity throughout the day and into the evening. To achieve this, the Island Plan seeks to identify and define two distinct areas, the core retail area and St Helier town centre, to help both maintain and enhance retail activity; and to ensure and enable complementary land uses and activities.'

2.8 Two Island Plan policies are of principal relevance to the proposed retail floorspace.

2.9 Policy ER1 'Retail and Town Centre Uses' seeks to generally support retail uses within St Helier's core retail area. New retail development will be encouraged in the core retail area and changes of use away from retail will only be permitted in certain circumstances.

2.10 Policy ER1 goes on to state that:

'Proposals for new retail and town centre development, or the refurbishment or extension of existing retail and town centre uses will be supported in the St Helier town centre and the defined centre at Les Quennevais.

Proposals for the development of retail floorspace over 200 sq.m (gross internal floor area) may be supported within these areas where it can be demonstrated that they do not harm the primary retail function of the St Helier core retail area.'

2.11 Policy ER2 'Large-Scale Retail' then provides more detailed policy guidance in respect of retail development proposals. It states that:

'Proposals for the provision of new large-scale retail floorspace (200 sq.m gross internal floor area and above) or the redevelopment, refurbishment or extension of existing retail (leading to 200 sq.m gross internal area and above) will be supported in the built-up area where the development:

- a. accords with the sequential approach to development;
- b. itself, or cumulatively with other existing or consented retail developments, will not cause detriment to the vitality or viability of the St Helier core retail area; St Helier town centre; the defined centre at Les Quennevais centre; or a local centre, which must be demonstrated through submission of proportionate evidence of the anticipated retail impact;
- c. represents an effective use of land and does not materially prejudice the adequate provision of other land uses, particularly the supply of land for other employment uses, homes, community uses and open space;
- d. will not unreasonably affect the character and amenity of the local area;
- e. is accessible by a choice of means of transport, including by public and active travel (including walking and cycling), and for those with mobility impairments, and does not have an unacceptable impact on the transport network; and
- f. provides adequate space and facilities for servicing and deliveries.

Proposals for the provision of new large-scale retail which do not accord with the sequential approach to development may be supported in the built-up area where it can be demonstrated that:

- g. a need exists for the location, scale and type of development; and
- h. that there are no other sites higher up the sequential approach that are suitable or available.'

2.12 Criteria a, b, g and h are of relevance to the sequential and impact tests and are directly addressed by this Retail Planning Policy Statement. The remaining criteria are addressed by other submitted planning application documents.

Overview in Respect of Relevant Planning Policy Requirements

2.13 The commercial development associated with the application scheme is located within the defined St Helier town centre boundary but is outside of the core retail area. The proposal includes the provision of a total of 1,296 sq.m of retail floorspace. As such, Policies ER1 and ER2 are of relevance to the appraisal of the proposal.

2.14 In this regard, Policy ER1 provides support for new retail and town centre development in the St Helier town centre, on the condition that applicants will need to demonstrate that proposals which provide for greater than 200 sq.m of gross floorspace do not harm the primary retail function of the St Helier core retail area. As such, a review of the potential impact of the proposed retail floorspace is required to support the application.

2.15 Furthermore, Policy ER2 requires retail proposals providing more than 200 sq.m of floorspace to demonstrate that they satisfy six criteria (four of which relate to the sequential and impact tests)

2.16 We go on to address the requirements of Policies ER1 and ER2 in the following sections of the report.

3. The Sequential Test

The Purpose of Proposed Retail and Commercial Floorspace

- 3.1 The proposed retail and commercial floorspace is an integral part of the application scheme, creating interest and activity at ground floor level and ensuring that local needs can be met on-site in a sustainable manner. The commercial uses proposed across the scheme are entirely complementary to one another and are inter-related to the wider function of the development. It is also important to recognise that the commercial element of the application proposal is wholly located within the wider St Helier town centre boundary as identified by the Bridging Island Plan Proposals Map.
- 3.2 The development of the site for mixed-use purposes is therefore generally consistent with development plan policy. In this context, it would be unusual if no retail floorspace were incorporated within a scheme of this nature. In practice, the proposed quantum of Class A floorspace development is modest, accounting for less than 1% of the overall floorspace supported by the application.
- 3.3 The opportunity for retail and other commercial uses in this location arises as a consequence of the wider proposed development and the location of the application site. The commercial floorspace associated with the proposal (including proposed retail floorspace) seeks to serve four principal markets, these being:
- residents of the scheme;
 - existing residents in the immediate area;
 - those working in the immediate area; and
 - visitors to the Waterfront and nearby attractions.
- 3.4 These four commercial opportunities cannot be served in the same manner from sites within St Helier's core retail area. Put simply, should planning permission be refused for the subject application proposal, the retail element of the scheme would not be decanted to a more central site. The opportunity to support retail uses exists only because of the activity and economic benefits generated by the wider scheme.

Sequential Test Planning Policy Requirements

- 3.5 Policy ER2 requires that the sequential test be applied to retail development with reference to:
- the need which exists for the location, scale and type of development; and
 - the suitability and availability of alternative sites.
- 3.6 Each of these considerations is addressed below. Given that the scheme is located within the wider town centre boundary, only the retail floorspace associated with the scheme needs to be justified with reference to the requirements of Policy ER2.

The Need for Location, Scale and Type of Proposed Development

- 3.7 In order to consider the needs which the retail element of the development will serve, it is relevant to estimate the expenditure generated by residents of the wider development scheme.

3.8 The residential element of the scheme is comprised of:

- 460 one-bed units;
- 328 two-bed units; and
- 196 three-bed units.

3.9 It is assumed that one-bed apartments will accommodate two residents, two-bed apartments will accommodate three residents, and three-bed apartments will accommodate four residents. The likely number of residents accommodated within the scheme is estimated below at Table 3.1 on this basis.

Table 3.1: Estimated Population Supported by Residential Element of the Proposed Development

Type of Accommodation	Number of Units	Number of Persons Per Unit	Population
One Bedroom	460	2	920
Two Bedroom	328	3	984
Three Bedroom	196	4	784
Total	984	-	2,688

3.10 The level of retail expenditure generated by residents can be calculated with reference to average per capita convenience and comparison expenditure figures. In this regard, expenditure data is presented in the Jersey Retail Study 2008. Whilst this Study is now dated, it provides forecast per capita expenditure data² which is considered credible and broadly consistent with current comparable figures across the UK. The use of the 2008 Study data is considered appropriate in providing a broad estimate of the retail expenditure generated by residents of the scheme.

3.11 Table 3.2 sets out the per capita expenditure figures identified for reporting year 2025³ in the Study. These are then converted to a more contemporaneous 2021 price base⁴. By applying the per capita expenditure forecasts to the above population figure, the estimated expenditure generated by scheme residents can be calculated. This exercise is also undertaken within the below Table 3.2.

Table 3.2: Estimated Per Capita Retail Expenditure and Expenditure Generated by Proposed Development

Type of Expenditure	Per Capita Expenditure at 2025 (£) (2005 Prices)	Per Capita Expenditure at 2025 (£) (2021 Prices)	Population	Total Expenditure (£m)
Convenience	2,201.6	3,703.7	2,688	9.96
Comparison	4,076.9	4,250.9	2,688	11.43

Note: Per capita expenditure derived from Table 2 of Appendix 6 of the Jersey Retail Study 2008; converted from 2005 prices to 2021 prices using indices set out at Appendix 4b of Experian Retail Planner Briefing Note 20 (February 2023)

3.12 Based on a population of 2,688 people, the scheme could generate in the order of £9.96m of convenience goods expenditure and £11.43m of comparison goods expenditure (in 2021 prices).

² Table 2 of Appendix 6 of the Jersey Retail Study 2008.

³ This is the latest reporting year considered by the 2008 Study. In practice, the proposal would be completed subsequent to 2025 and the use of 2025 figures is therefore considered cautious given the likely future growth in expenditure beyond this date.

⁴ The price indices set out at Appendix 4b of Experian Retail Planner Briefing Note 20 (February 2023) – which relate to goods inflation across the UK – are used to convert 2005 prices to 2021 prices.

- 3.13 The majority of convenience goods expenditure is typically committed via ‘main food’ shopping trips at larger stores. However, in this instance, larger foodstore options are relatively distant from the application site and there is the ability to secure a significant proportion of convenience goods expenditure generated by the residential component of the proposed development.
- 3.14 On this basis, we make the cautious assumption that 30% of the convenience goods expenditure generated by the scheme could be retained on-site. This means that £2.99m of scheme expenditure would be available to support the proposed convenience store.
- 3.15 Most comparison goods expenditure generated by the scheme will be directed to St Helier’s core retail area. However, the proposed convenience store will stock day-to-day household comparison goods. Other occupiers could also sell day-to-day comparison goods which are often purchased close to home (such as beauty and medical goods, gifts and cards, stationery items, and so on). We estimate that 15% of comparison goods expenditure generated by residents of the scheme could be retained on-site on this basis. This equates to £1.71m.
- 3.16 In order to establish the land use needs associated with the scheme, the above monetary figures can be converted to a floorspace requirement using generic convenience and comparison goods floorspace sales densities. In Nexus Planning’s experience, local needs convenience stores can often support a sales density of around £9,000 per sq.m. Comparison goods sales densities are generally more circumspect, and we estimate that comparison goods floorspace in this location could support a sales density of around £6,000 per sq.m.
- 3.17 We set out below the localised net floorspace requirement generated by residents of the scheme below on this basis at Table 3.3. Retail net sales areas often equate to around 70% of the overall gross floor area of a retail unit and we apply this ratio in converting the net sales figure into a gross floorspace requirement.

Table 3.3: Localised Floorspace Requirement Generated by Scheme Residents

Type of Expenditure	Total ‘Locally Retained’ Expenditure (£m) (2021 Prices)	Assumed Sales Density (2021 Prices)	Net Floorspace Requirement (sq.m)	Gross Floorspace Requirement (sq.m)
Convenience	2.99	9,000	332	474
Comparison	1.71	6,000	285	407
Total	-	-	617	881

- 3.18 The scheme provides for up to 1,296 sq.m gross Class A retail floorspace. Based on our above assessment of local needs, around 881 sq.m (or 68%) of the proposed retail floorspace could be supported directly by scheme residents. The remainder would be supported by existing residents, people working in the area, and visitors to the Waterfront and its wider attractions.
- 3.19 The retail floorspace associated with the scheme therefore clearly serves the needs of the wider development (and the immediate local area). In this regard, it is ‘location specific’ (i.e. it could not function in the same way and meet local needs as conveniently if it were located away from the application site and closer to St Helier’s core retail area).
- 3.20 The retail floorspace associated with the scheme would not compete for the same commercial market opportunity as operators within the core retail area. On this basis, it is compliant with the requirements of the sequential test as identified by Bridging Island Plan Policy ER2.

The Suitability and Availability of Alternative Sites

- 3.21 Notwithstanding the above, consideration has been given to the availability of sites within and closely related to the core retail area to accommodate the proposal. The sequential test is generally applied with reference to the scale and format of development that the applicant seeks to deliver, having regard to the need to apply flexibility to ensure that genuine alternative sites are properly considered.
- 3.22 In this regard, the applicant seeks to deliver a substantial mixed-use development scheme. All proposed land-uses are complementary and inter-related. In practice, the retail element of the scheme would not be delivered in isolation within the core retail area should planning permission be refused for the subject development.
- 3.23 Notwithstanding this, we have reviewed opportunities within and adjacent to the core retail area to consider the potential to deliver approximately 1,296 sq.m of Class A retail floorspace (or thereabouts) on a more central site.
- 3.24 In this context, we have reviewed available retail and leisure units together with land for development which are being marketed via the LoopNet database⁵. Four retail and leisure units are listed as being available to let within the core retail area, and no such units are listed as being available to purchase.
- 3.25 These units are as follows:
- 5 Broad Street, which provides 103 sq.m of gross floorspace;
 - 8-12 Halkett Street, which provides 256 sq.m of gross floorspace;
 - 20 Hilgrove Street, which provides 49 sq.m of gross floorspace; and
 - 1 Searle Street, which provides 59 sq.m of gross floorspace.
- 3.26 Clearly, the above units are of a limited scale. The largest premises at 8-13 Halkett Street are considerably smaller than the proposed convenience store element of the application scheme. Furthermore, the Halkett Street premises are at first floor level and could not realistically accommodate a convenience goods operator in any event because of this constraint.
- 3.27 In addition, MS Planning undertook a land use survey of St Helier town centre on 27 April 2023. This survey updated the current Experian Goad plan for St Helier (which is itself based on Experian Goad's survey of October 2021). The Experian Goad St Helier town centre plan extends beyond the core retail area and records the land use of almost all commercial properties within the St Helier area.
- 3.28 The largest commercial properties which were identified as being currently vacant by the survey and are in a sequentially preferable location (in respect of the relationship with St Helier's core retail area) are as follows:
- 10-12 Queen Street, which provides 590 sq.m of gross floorspace; and
 - 29-31 Halkett Street, which provides 300 sq.m of gross floorspace.
- 3.29 The largest of these units at 10-12 Queen Street provides 46% of the retail floorspace proposed by the applicant's scheme and is located approximately 800 metres away from the application site⁶. In respect of convenience goods shopping function of the proposed scheme, the Queen Street unit could not serve the same 'top-up' shopping needs as the application scheme as it is too distant from the commercial market opportunity which is to be served.

⁵ Which is used by leading Jersey commercial agents (including D2 Retail Estate, Maillard & Co, and Sarre & Company), and which was consulted on 4 May 2023.

⁶ Based on the most direct pedestrian route.

Conclusions in Respect of the Sequential Test

- 3.30 Bridging Island Plan Policy ER2 identifies that the sequential test should be applied having regard to the need which exists to support the scale and type of development proposed, and with reference to the suitability and availability of alternative central sites.
- 3.31 In this context, we have demonstrated that the proposed retail uses are 'location specific', i.e. the retail uses are an integral part of the application scheme as they meet needs arising within the wider development. The same retail development would not be supported within the core retail area (or at a site substantially closer to it). In any event, vacant properties in and around the core retail area are of a limited scale and offer no realistic prospect of accommodating a similar form of retail development.
- 3.32 It is therefore concluded that the application proposal clearly accords with the requirements of the sequential test.

4. The Retail Impact Test

Impact Test Planning Policy Requirements

- 4.1 In terms of retail impact, Policy ER2 identifies that development should not cause detriment to the vitality or viability of the St Helier core retail area or the town centre as a whole. This will be demonstrated through a proportionate assessment of the likely impacts arising from development.
- 4.2 Page 158 of the Bridging Plan indicates that the acceptability of any impact will be considered with reference to the viability of existing retail provision and any changes in footfall patterns and market share.
- 4.3 At the outset, it is important to recognise that the proposed development is located within the wider St Helier town centre boundary and that the mix of uses proposed is entirely consistent and complementary to that setting. The development will have a beneficial impact in supporting a significant residential population in a central location and in accommodating commercial uses which additional jobs. The in-centre location of the application site means that the proposed development will be complementary to the wider role of the centre and to existing businesses.
- 4.4 In applying the retail impact test, consideration is usually given to whether a proposal could impact on the delivery of planned or committed in-centre investment. In this regard, there is no known large-scale investment within St Helier's core retail area which could be prejudiced by the application proposal.
- 4.5 The second strand of the impact test relates to the potential for a proposal to divert expenditure away from in-centre retailers such that the overall vitality and viability of the centre could be materially affected. We address this matter below. All monetary figures referred to in the below assessment are expressed in 2021 prices (unless otherwise indicated).

The Existing Vitality and Viability of St Helier Town Centre

- 4.6 In order to consider the materiality of impacts arising from a proposal, it is relevant to first consider the role, function, and vitality and viability of relevant town centres. In this instance, St Helier is the only centre of relevance in respect of retail impact given the nature of the proposal and the moderate quantum of retail floorspace proposed.
- 4.7 The general role of St Helier is explained by the supporting text of the Bridging Island Plan. Page 151 of the Plan states that:

'The main retail and town centre location in Jersey is St Helier town centre which serves as the island's principal year-round shopping attraction and primary retail hub. During peak Christmas and summer periods, residents and visitors make more than 200,000 visits per month to King Street alone. The town centre also accommodates a large number of non-retail town centre uses including leisure and entertainment, arts and culture, civic, and daytime and evening economy. This includes a diverse range of facilities and venues which are not found elsewhere in the island including the Jersey Opera House and the Jersey Art Centre, galleries, museums, a cinema, and a range of eating and drinking establishments.'

Maintaining and enhancing the vitality of St Helier town centre will require support for the protection and provision of both retail and non-retail uses, which attract islanders and visitors to the town centre, and which generate activity throughout the day and into the evening. To achieve this, the Island Plan seeks to identify and define two distinct areas, the core retail area and St Helier town centre, to help both maintain and enhance retail activity; and to ensure and enable complementary land uses and activities.'

- 4.8 The commercial offer provided as part of the application proposal clearly reflects the need for modern centres to

support diverse and complementary uses which encourage residents and visitors to linger and support multiple different businesses as part of the same trip.

4.9 Pages 153 and 154 of the Plan go on to note that:

‘It is recognised that the future vitality of St Helier town centre rests on retaining its primacy as the island’s main centre for shopping, eating, drinking and leisure. The vitality of the town centre is a direct product of ensuring a concentration of diverse but complementary uses – not just different types of retail but also places where people choose to visit, eat, drink and socialise. This creates an environment where islanders and visitors will want to spend more time and where retail spend is correspondingly increased.

As a result, this Island Plan supports the provision of retail, in addition to a wider range of town centre uses – including leisure and entertainment, arts and culture, civic, and daytime and evening economy - across the defined area of the town centre. This serves to recognise and support the contribution of different aspects of the town – such as the restaurants of Kensington Place; the independent shops of Colomberie; and the night-life of The Weighbridge – to the attractiveness and vitality of the town centre.’

4.10 Page 153 of the Plan also notes that St Helier’s retailers have been impacted by the Covid-19 pandemic and by the general shift to online retail. However, it is clear that St Helier’s vacancy rate has traditionally been low and that the general vitality and viability of the centre has been good. In this regard, St Helier is assisted by its attractive townscape, the activity and expenditure provided by tourists, and the limited amount of out of centre floorspace on the Island.

4.11 Accordingly, whilst St Helier (like most centres) has been the subject of abnormal market conditions due to the Covid-19 pandemic, it is considered to be generally healthy and resilient.

4.12 MS Planning undertook a land use survey of the centre on 27 April 2023. The survey utilised the Experian Goad land use plan and therefore covers an area which is larger than the core retail area. The below Table 4.1 sets out the current composition of the centre based on the Experian Goad’s definition of the town centre boundary.

Table 4.1: Land Uses Across Experian Goad Town Centre Boundary at April 2023

Land Use	Number of Units	Proportion of Units (%)	Quantum of Floorspace (sq.m)	Proportion of Floorspace (%)
Convenience	38	6.8%	12,700	11.1%
Comparison	187	33.5%	44,980	39.3%
Retail Service	85	15.2%	10,450	9.1%
Leisure Service	173	30.9%	31,150	27.2%
Financial & Business Service	33	5.9%	9,400	8.2%
Vacant	43	7.7%	5,750	5.0%
Total	559	100.0%	114,430	100.0%

4.13 The above table illustrates the multi-functional nature of the town centre. Whilst retail uses account for 40.3% of commercial units, there is a very strong leisure service offer (which accounts for 30.9% of units). The composition of uses is consistent with St Helier’s role as the key comparison goods retail destination on the Island and its ability to support leisure and tourism-related operators.

4.14 MS Planning’s survey recorded 43 vacant units, which equates to a vacancy rate of 7.7% of the total units. In total,

there is 5,750 sq.m of vacant commercial floorspace, which means that 5.0% of commercial floorspace is currently vacant. To place this into context, the UK national average vacancy rate in respect of both units and floorspace is 13.8%⁷. Accordingly, St Helier’s vacancy rate is low and reflective of a strong centre. By way of further context, Experian Goad’s October 2021 survey of St Helier identified 54 vacant units; the improvement suggests that the centre is recovering well following the effects of the Covid-19 pandemic.

4.15 Given the above, St Helier is considered to be a healthy multi-functional centre which provides a focus for comparison goods retailing on the Island, and which also has a strong leisure and tourism role. The centre is demonstrably vital and viable.

Assessing Impact: Turnover of the Application Proposal

4.16 Paragraph 5.6.4 of the Design & Access Statement⁸ submitted in support of the scheme provides a schedule which identifies the scale of each element of the proposed development. It indicates that retail floorspace will be split across five plots. Plot D will accommodate the largest retail unit – amounting to 644 sq.m gross – which will accommodate a convenience store. We confirm the proposed retail floorspace below and estimate its anticipated turnover. In calculating the turnover of the scheme, we draw on the same broad assumptions set out in Section 3 of this assessment in respect of retail need. We assume that:

- net sales areas equate to 70% of proposed gross retail floorspace;
- convenience goods floorspace will secure a sales density of £9,000 per sq.m; and
- comparison goods floorspace will secure a sales density of £6,000 per sq.m.

4.17 Table 4.2 confirms that the application proposal will support 644 sq.m of gross convenience goods floorspace and 652 sq.m of gross comparison goods floorspace. Based on the assumption that the net sales area will equate to 70% of gross, the scheme will support 451 sq.m of convenience sales floorspace and 456 sq.m of comparison goods sales floorspace⁹. As Table 4.2 sets out, based on an assumed sales density of £9,000 per sq.m, it is anticipated that the convenience goods floorspace associated with the proposal will have a turnover of around £4.06m. Based on a lesser assumed sales density of £6,000 per sq.m, the comparison goods floorspace will have a turnover of around £2.74m. The total estimated turnover of the proposed retail floorspace is therefore £6.80m.

Table 4.2: Estimated Turnover of Proposed Retail Floorspace

Plot	Type of Floorspace	Gross Floorspace Requirement (sq.m)	Net Floorspace Requirement (sq.m)	Assumed Sales Density (2021 Prices)	Turnover (£m)
C	Comparison	272	190	6,000	1.14
D	Convenience	644	451	9,000	4.06
E	Comparison	260	182	6,000	1.09
P	Comparison	120	84	6,000	0.50
<i>Total Convenience</i>		<i>644</i>	<i>451</i>	<i>9,000</i>	<i>4.06</i>
<i>Total Comparison</i>		<i>652</i>	<i>456</i>	<i>6,000</i>	<i>2.74</i>
Grand Total		1,296			6.80

⁷ As identified by Experian Goad at September 2022.

⁸ Prepared by HETA and Gillespies and dated December 2022.

⁹ We assume that the convenience store will be wholly dedicated to the sale of convenience goods items. In practice, a small amount of this store’s sales area will be dedicated to comparison goods. Given the fact that comparison goods secure a lesser sales density, the approach is considered cautious in estimating the scheme’s turnover.

Assessing Impact: Turnover of St Helier Town Centre

- 4.18 Table 12 of Appendix 6 of the Jersey Retail Study 2008 estimates that St Helier will have a convenience goods turnover of around £71.26m at 2025 in 2005 prices and a comparison goods turnover of around £389.62m at the same year at the same price base.
- 4.19 The price indices provided at Appendix 4b of Experian Retail Planner Briefing Note 20 are used to convert these figures to the 2021 price base. As we set out below at Table 4.3, in 2021 prices the estimated convenience goods turnover of St Helier at 2025 in 2021 prices is £119.87m and the estimated comparison goods turnover is £406.24m. The turnover figures include both residents' and visitors' expenditure.

Table 4.3: Estimated Turnover of St Helier's Retailers

Type of Floorspace	St Helier Turnover at 2025 in 2005 Prices (£m)	St Helier Turnover at 2025 in 2021 Prices (£m)
Convenience	71.26	119.87
Comparison	389.62	406.24
Total	460.87	526.11

Assessing Impact: Assumed Trade Diversion from St Helier Town Centre

- 4.20 As set out at Section 3 of this assessment, the retail floorspace associated with the application proposal will principally meet needs which arise as from the planned residential element of the development. The development will support the ongoing regeneration of the area and a future increase in the population of St Helier. The scheme is effectively 'self-sustaining'; a significant proportion of the turnover of proposed retail floorspace would be derived from residents of the scheme and some of this expenditure would not be available to St Helier's existing retailers should planning permission for the scheme be refused.¹⁰
- 4.21 Notwithstanding this, to further provide confidence that the scheme will not be of material consequence in terms of the trading performance of St Helier's retailers, we provide an assessment of trade diversion impact below which assumes that the entirety of the scheme's retail turnover will be diverted from operators within St Helier town centre. This is an unrealistic 'worst case' scenario which significantly overstates the impact of the proposal.
- 4.22 Notwithstanding this, the below Table 4.4 demonstrates that the impact arising within the town centre based on this scenario equates to just 1.3% of its retail turnover. Even on this basis, the impact of the scheme would be imperceptible to most operators. There would be no change in respect of footfall in the town centre and no consequence in respect of the vitality and viability of the centre.

¹⁰ It is accepted that some residents of the scheme will relocate from elsewhere in St Helier and that, in such circumstances, some expenditure will be diverted from retailers located within the core retail area.

Table 4.4: Estimated Trade Diversion Impact Arising at St Helier

Type of Floorspace	St Helier Turnover at 2025 in 2021 Prices (£m)	Trade Diversion Based on 100% of Turnover Diverted from St Helier in 2021 Prices (£m)	Trade Diversion Impact (%)
Convenience	119.87	4.06	3.4%
Comparison	406.24	2.74	0.7%
Total	526.11	6.80	1.3%

4.23 Furthermore, it is important to recognise that the application proposal generally helps to support the wider town centre and that the proposed retail component is complementary to the wider role and function of the scheme. The development would also support a substantial number of local jobs, which would also boost St Helier’s economy. The impact arising from the scheme would therefore be positive in practice.

Conclusions in Respect of the Impact Test

4.24 Bridging Island Plan Policy ER2 indicates that applications for large scale retail proposals should be accompanied by a proportionate impact assessment to demonstrate that development would not cause detriment to the vitality and viability of St Helier town centre.

4.25 In this context, the above assessment has demonstrated that:

- there is no in-centre development of relevance to the application proposal;
- the retail floorspace associated with the application proposal will principally meet needs arising from the development itself;
- St Helier is a multi-functional centre which is generally vital and viable and is the subject of a low vacancy rate; and
- even if all the retail turnover of the application proposal were diverted from existing retailers in St Helier town centre, the impact would equate to just over 1% of operators’ turnover.

4.26 Given the above, it is concluded that the proposal would not materially impact on St Helier’s vitality and viability. In practice, the wider development is wholly appropriate to its location within the wider town centre and there would be significant positive benefits arising from its implementation. The proposal is consistent with the requirements of Policy ER2 in respect of impact.

5. Summary and Recommendations

- 5.1 The subject outline planning application relates to an outline planning application which provides for the demolition of existing structures and the phased construction of a mixed-use development (comprising up to 984 dwellings and up to 31,125 sq.m of non-residential floorspace) on land located within the south-western part of St Helier town centre.
- 5.2 A total of 1,296 of Class A retail floorspace is proposed. The commercial development proposed by the application is located outside of St Helier's core retail area but is within the wider town centre boundary.
- 5.3 Policies ER1 and ER2 of the Bridging Island Plan indicate that the sequential and impact tests will apply to retail development in such a location.
- 5.4 This Retail Planning Policy Statement has demonstrated that the proposed retail floorspace will principally meet needs which arise from the residential component of the development. The retail floorspace will also service those who work and reside in the immediate surrounding area, along with visitors to the Waterfront. The proposed retail floorspace is an integral and complementary part of the proposed development and the need serviced is therefore 'location specific' on this basis. The application proposal accords with the sequential approach to development on this basis.
- 5.5 Notwithstanding this, existing vacant premises in the core retail area are of a small scale and do not offer scope to accommodate the retail floorspace associated with the scheme.
- 5.6 In considering the impact test, it is relevant to note that the wider residential development supported by the application will help support in-migration and population growth. The residential floorspace will principally support local needs arising from this additional population.
- 5.7 However, even if it were to be assumed that the proposed retail floorspace would trade squarely against retailers within St Helier's core retail area, then the trade diversion impact arising from development is still low. The assessment provided at Section 5 of this report identifies that trade diversion would be just above 1% under this 'worst case' scenario. In practice, the proposed development is wholly complementary to the wider role and function of St Helier town centre. The development would support a substantial number of local jobs, which would in turn boost St Helier's economy. The overall economic impact arising from the scheme would be positive.
- 5.8 Given the above, the application proposal fully accords with the sequential and impact tests as articulated by Policies ER1 and ER2 of the Bridging Island Plan, and its refusal on retail planning policy grounds could not be supported.



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