

Houndhill Courtyard
Houndhill, Marchington
Staffordshire ST14 8LN
Telephone: 01283 820040 Fax: 01283 821226
email office@jvhplanning.co.uk

Submissions on behalf of Aucott Group

LP064

Matter 11 Town Centre Retail and Office Growth

11.1 Is the Plan's retail provision for Tamworth town centre appropriate and deliverable within the plan period?

1. There are two aspects to this question:

(i) is the identified retail provision in Tamworth town centre, the Gungate redevelopment, appropriate and deliverable; and

(ii) is the Plan's retail provision in terms of quantitative retail capacity appropriate and deliverable.

2. We address these in turn.

The Gungate Redevelopment

3. SS1 of the Plan sets out that the town centre will be the location for 10,700m² of new retail floorspace between 2021 and 2031. In the shorter term the retail needs of the town are to be met by the Gungate redevelopment.

4. The Gungate redevelopment has been a project that has been proposed since before 2006.

The 2006 adopted Local Plan included at Policy TCR2 a policy to redevelop the Gungate Precinct with a minimum of 4,000m² of retail floorspace. At that time the precinct was principally vacant. This remained the situation for several years. At the time of the two major retail planning appeals in 2005 the Gungate redevelopment was supposed to be coming to fruition. A planning consent was originally granted for the redevelopment in 2009

for the construction of retail floorspace. It has been a project that has been relied upon by the Council to counter alternative retail developments in Tamworth as a preferable location, but to date it has delivered nothing. In the meantime, the retail developments that have been allowed both on appeal and by the Council have been developed and are providing both retail services and significant local employment.

5. In terms these developments comprise the site adjacent to the Tamworth Herald, now occupied by the John Lewis Home, the land at Ventura Park Road now occupied by a series of retailers including Next Home., B&Q, Maplin, Carpet Right, Oakland Furnitureland Bensons The Land at the Site of the Former Allied Carpets is now developed for the restaurants Pizza Express ,Nandos and Costa Coffee.
6. The position with regard to the Gungate project is that permission was granted for the development in 2009 for 20,660m² of retail floorspace and car parking for 732 vehicles. This permission was renewed in November 2013 subject to conditions relating to archaeological investigation, drainage, ground conditions, delivery hours, FRA and Suds scheme. To date there is no reserved matters application and none of the conditions have been discharged. The scheme as permitted comprises an integrated building over five levels with two levels of basement car parking, roof top parking and two internal retail levels. This type of construction cannot offer any type of piecemeal floor space in advance of the construction of the whole centre and in essence has to be constructed as an entity.
7. In recent years, retailers considering coming to Tamworth have indicated that they would not be willing to locate at Gungate. These included the Top Shop chain, and the restaurants recently opened at Ventura Park, who specifically stated that they would only locate within the Ventura area.

8. Throughout our dealings with the retail developments that have come to fruition over the last 10 years or so, the Council have consistently suggested that Gungate was an alternative location for new retailers when the scheme is not even at an implementable stage.

9. It is considered now that the scheme will not come to fruition as envisaged by the Council, the major retailers who would be relied upon to anchor the development wish to be located at Ventura where the major stores of John Lewis, Marks and Spencer, Next, Asda and the high street fashion retailers are all located and operating successfully.

10. Our suggestion is that the Gungate location should be considered for an alternative use which could include residential development close to the centre of the town. There is clearly a pressing need for residential development in the Borough given the overall OAN requirements and this is a location that could provide a development that would meet demographic requirements. Indeed the existing Alms Houses adjoin Gungate and are a previous response to housing in this central location.

11. The concept of the delivery of Gungate for 20,000m² of floorspace is not a sound one. This together with a further 10,700m² of floor space in the town centre after 2021 is simply unachievable given the nature of the centre and alternative land use requirements. It is noted in this respect that certain other town centre sites have in the past been promoted as alternative retail site at the bus depot and Norris Bros, Lichfield Street. (housing site refs 349 and 348 are now both proposed housing allocations)

12. The Approach to the town centre is to seek to frustrate development out of the centre and set a low limit for impact assessments without any clear justification of how the figure of 250m² has been arrived at. This is considered further in the Indigo Quantitative

Assessment of Retail Need which accompanies this submission The Plan fails to be positive towards the economic growth that derives from the retail parks and which is providing important jobs and economic stimulation. The Employment Land review of December 2013 ref C2 makes it clear that the retail trade supports the highest number of jobs in the Borough [para 3.32] That document also notes that the retail sector is important for future jobs but that these are relied upon coming forward in the Town Centre at Gungate [para 3.76]. The creation of new jobs coming to Gungate is a precarious strategy It is at the retail parks where job growth in retailing has been achieved.

13 Recently the redevelopment of the former Allied carpets unit resulted in the restaurants Pizza Express, Nandos and Costa Coffee locating onto Ventura Park and creating 70 new jobs. This positive economic outcome was resisted by the Council initially at planning committee, and it took a second application before approval was granted; the whole process taking a period of 2 years to achieve a consent. Even at that stage the planning officers recommended refusal of the scheme despite the jobs that would be created and the economic benefits.

14 The resistance to development and growth and job creation at the retail parks has been a hallmark of the planning regime in Tamworth for many years. Most of the major retail schemes have been finally allowed on Appeal. The opportunity now exists for the Council through the Plan to plan positively for the Retail Parks, to allow for their growth and to maximise the economic benefits and jobs that they have created and continue to create. This would have to be accompanied by a revised vision for the centre of town and the opportunities there for land uses that are seriously needed such as residential and creating an attractive environment to enhance the historic legacy of the town.

15 The changes that would be needed to policy as drafted are:-

- Non reliance on the Gungate permission being implemented.
- A positive approach to the retail parks to allow additional floor space and extensions of the existing units
- Change to the threshold for the impact test.
- A revision of Policy EC1 to acknowledge the role and function of the retail parks.

Retail Capacity for New Floorspace

16 Turning to the question of retail capacity, the provision identified in the Council's retail evidence base, the Tamworth Town Centre and Retail Study (TTCRUS) 2014 is neither appropriate nor deliverable it is flawed and significantly underestimates the amount of retail floorspace capacity there is within the Borough over the plan period.

17 The Indigo Quantitative Assessment of Retail Need sets out our detailed concerns regarding the robustness of the retail evidence base and undertakes a revised capacity assessment exercise. We provide a summary of those findings here.

18 The TTCRSU 2014 was prepared by England & Lyle (E&L) on behalf of Tamworth Borough Council. The quantitative methodology followed by E&L in identifying capacity for new retail floorspace does not accord with good practise. In particular, E&L:

- fail to take account of quantitative and qualitative overtrading in the capacity analysis; and
- make unrealistic assumptions regarding the delivery of the Gungate scheme.

19 In assessing retail capacity, the conventional methodology is to include overtrading. E&L have failed to take into account the performance of existing facilities and the expenditure capacity generated through current levels of overtrading. E&L acknowledge that convenience and comparison facilities in the Borough are overtrading (paragraphs 5.24 - 5.25, TTCRSU 2014). However, their assessment of capacity addresses expenditure growth only.

20 When allowance is made for overtrading, it is clear that there is very significant retail capacity in Tamworth. This is shown in Table A below.

Table A: Revised Capacity taking into account Overtrading

	2016 (£m)	2021 (£m)	2031 (£m)
Convenience			
E&L expenditure capacity	-9.48	1.16	23.88
Capacity through overtrading	23.26	30.81	48.15
Revised expenditure capacity	13.78	31.97	72.03
Comparison			
E&L expenditure capacity	-47.99	-36.02	35.83
Capacity through overtrading	197.37	231.31	347.53
Revised expenditure capacity	149.38	195.29	383.36

Source: Table 3.4 of the Quantitative Assessment of Retail Need.

E&L assume that Gungate will be built and trading by 2016.

21 The expenditure capacity shown in Table A equates to a comparison capacity 2016 is 42,680m² (gross) rising to 81,740m² (gross) at 2031.

22 Indeed, the above figures assume that Gungate will be delivered at 2016 as consented. As previously explained, it is certain that the Gungate scheme will not be delivered in 2016 and it is very likely that it will not be delivered at all, as consented. If the Gungate site is delivered for retailing, it is likely that it will deliver considerably less floorspace than that

approved. In short, the capacity figures identified above are likely to be higher.

- 23 Without a realistic understanding of how much floorspace is required over the plan period, E&L cannot advise the Council on an appropriate strategy to meet those needs.
- 24 Notwithstanding that their capacity figures are wrong, E&L also do not assess the capacity of the development opportunity sites to accommodate new retail floorspace.
- 25 Without an understanding of the size and scale of floorspace that may be realistically accommodated on development opportunity sites, the Council cannot determine if the retail and leisure needs identified over the plan period can be met in full or if it is necessary to plan for an expansion of the town centre or to identify alternative sites elsewhere.
- 26 Our findings have determined that the comparison goods floorspace capacity of the Borough at 2031 is likely to be around 82,000m² (gross). It is likely to be more if the Gungate scheme is not delivered as approved. This also excludes the floorspace required to meet the need for other town centre uses which has not been robustly assessed by E&L. The town centre cannot realistically accommodate all of this floorspace over the plan period. The Council needs to consider alternative sites to accommodate the future floorspace needs.
- 27 In short, we do not consider that the retail provision for Tamworth town centre is appropriate or deliverable over the plan period because:
- There is significantly more capacity for new retail floorspace within the Borough over the plan period than the Local Plan currently allows for;
 - The town centre cannot accommodate all of the future floorspace needs; and

- It is highly unlikely that the Gungate scheme will be delivered as approved.

28 Overall, E&L's and the Council's approach to retailing in Tamworth is flawed. It does not take a positive approach. For the reasons set out in the Quantitative Assessment of Retail Need, it is clear that the town centre and the retail parks to the south west of the centre serve different functions and complement each other, rather than competing. The Council should recognise this in preparing the Borough's retail strategy.

11.2 Is there a need for greater locational and/or qualitative guidance for retail development within or adjacent to the town centre or elsewhere?

29 Yes. The considerable need for new retail floorspace within the Borough has been outlined in our response to Q11.1 and in the accompanying Quantitative Assessment of Retail Need. It has been demonstrated that there is a need for considerably more retail floorspace than emerging Policy EC2 makes provision for, and that it is highly unlikely that this floorspace could be accommodated within the town centre. There is, therefore, a need to consider alternative sites for future retail development.

30 The out-of-centre Retail Parks are an established and popular retail destination. They play an important role in meeting higher order comparison goods needs for residents of Tamworth Borough and beyond. They provide a range and offer of fashion and homewares. They make a very valuable contribution to the local economy by retaining considerable retail expenditure that would otherwise be spent at centres elsewhere, attracting considerable retail expenditure from outside the Borough, and generating a significant number of local jobs which has valuable spin-off benefits for local retailers. Appendix 2 of

the Quantitative Assessment of Retail Need calculates that the retail floorspace south west of Tamworth town centre generates Gross Value Added of between £62.9m and £118.8m per annum for the local economy.

- 31 The benefits of the Retail Parks are entirely ignored within the TTCRSU 2014. The TTCRSU 2014 discusses the ‘dominance’ of the Retail Parks compared to the town centre, suggesting that the balance needs to be ‘redressed’ (paragraphs 5.22, TTCRSU 2014). It advises the Council that retail policy should seek to shift the ‘balance of attraction’ from the Retail Parks to the town centre (paragraph 5.21). Paragraph 6.22 explicitly states that *‘large out-of-centre development has harmed the vitality and viability of the town centre’*.
- 32 There is simply no evidence that the Retail Parks have harmed or will harm the town centre. The Quantitative Assessment of Retail Need includes evidence from the Javelin Group that the vitality and viability of Tamworth has increased in recent years. Despite this, E&L propose to restrict development at the out-of-centre Retail Parks (paragraph 5.25). There is no sense in this. The success of the Retail Parks has not come at the expense of the town centre.
- 33 The reality is that the Retail Parks in Tamworth are now a significant and very popular fashion and homewares shopping destination. However, the town centre is healthy, vital and vibrant. It has many strengths and opportunities to make the most of its individual character and distinct offer. It has also demonstrated that it can operate successfully alongside the Retail Parks without being in direct competition.
- 34 The contribution of the Retail Parks to the local Tamworth economy is enormous. The Council should embrace this success, not try to stifle it.

35 Instead of ignoring the role of the Retail Parks, the emerging Local Plan should recognise contribution they make in meeting local retail needs and supporting the local economy. It must take a sensible, proactive approach to planning for new retail floorspace including recognising the role the Retail Parks can, and do, play meeting floorspace demand that cannot be accommodated in the town centre, while protecting and enhancing the more distinct role of the town centre as a retail, leisure, business and community hub.

36 Indeed, given the constraints in the town centre and the enormous retail capacity in the Borough, the Council should consider extending the town centre to include the Ventura and Jolly Sailor Retail Parks, in much the same way as they have extended it to include the Snow Dome.

11.3 Is the convenience retail provision sufficient for the rest of the plan period?

37 As outlined in our response to Q11.1 there is capacity for more convenience floorspace within the Borough over the plan period than the emerging Local Plan currently makes provision for.

38 The Gungate site could reasonably accommodate this convenience retail floorspace provision as part of a revised redevelopment scheme. Improving the town centre's convenience provision would strengthen the existing retail offer and improve footfall.

Appended

Appeal decisions at Land adjacent to Tamworth Herald and Ventura Park Road.

Committee report Gungate and decision from 2013.

Committee report for Allied redevelopment

Letters re location and new letters.

Plan of what's on the retail parks.

Indigo Report Quantitative Assessment of Retail Need