



Date: 6 July 2015

Programme Officer – Tamworth Local Plan

South Staffordshire Council
Council Offices
Codsall
South Staffordshire
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Dear Ms Willis

Tamworth Local Plan Examination

We write on behalf of our client, Henry Boot Developments Ltd (HBDL), to respond to the Indigo Briefing Note (HD12) and England & Lyle Statement (HD16) which have been submitted in relation to Matter 11 of the Examination. We would be grateful if you were to bring the below comments to the attention of the Inspector.

We limit our observations to those matters which we consider could be material to the Inspector's considerations and do not seek to address every statement or assumption with which we disagree. We would be happy to provide further clarification in respect to any aspect of the below comments should the Inspector so wish.

Indigo Ventura Park Shopping Survey Briefing Note (HD12)

Mr McGrath of Indigo noted during the Examination Hearing of 24 June 2015 that the Briefing Note set out the findings of what was an '**on car park survey**'. Accordingly, through Mr McGrath's own description of the survey, it can be deduced that this is a survey of a particular type of shopper (those who travel by car) in a particular location (an out of centre retail park).

In this context, it is not wholly surprising that some visitors to Ventura Retail Park travelled from outside the Tamworth area. However, we would suggest that the survey's methodology is such that it is difficult to extrapolate any rate of inflow for comparison goods retailers across Tamworth as a whole from a survey based on an unrepresentative sample group.

Notwithstanding the limitations in terms of the survey's methodology, we do note from Question 6 that



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78.4% of those surveyed do not intend to visit Tamworth town centre as part of a linked trip to the retail park. Furthermore, Question 9 identifies that 40.2% of those surveyed would be encouraged to visit Tamworth town centre more regularly should it have a better non-food shopping offer and that 20.6% of respondents would visit more often if the centre accommodated a new department store.

Accordingly, we trust that it is evident from the survey that even car-borne shoppers who currently have reason to shop at the out of centre Ventura Retail Park could be persuaded back into the town centre in numbers as a result of the implementation of the large scale comparison goods floorspace proposed at Gungate. Clearly, the responses to Question 9 of the Indigo survey underline the critical importance of the Gungate development to the future performance of the town centre as a whole.

We also note that paragraph 3 of the Briefing Note sets out Indigo's proposition that town centre comparison goods floorspace 'overtrades' and that such overtrading could support additional floorspace. Whilst this was discussed in some detail at the Hearing, we reiterate that England & Lyle's general approach in this regard (i.e. its methodology is predicated on comparison goods floorspace trading 'at equilibrium' at base year) is appropriate and is one which is commonly deployed by consultants in undertaking local authority retail studies.

It is generally more appropriate to compare the identified 'survey derived' turnover of facilities to an expected 'benchmark' for convenience goods floorspace, where more comprehensive company average sales density data is available and there is lesser variation in trading performance according to location. In the case of comparison goods floorspace in Tamworth town centre, the use of an assumed sales density is not required – the survey results act to identify the performance level of town centre floorspace.

The difficulties in applying an assumed sales density to 'benchmark' comparison goods floorspace is demonstrated by the contrary position adopted in Indigo's submissions. On the one hand, paragraph 3.23 of Indigo's Quantitative Assessment of Retail Need submission of June 2015 seeks to cast doubt as to whether Gungate will ever be delivered, yet on the other, paragraph 3.55 suggests that comparison goods floorspace in the town centre trades at twice its expected level.

Indigo's position is illogical – if Tamworth town centre did 'overtrade' in the manner it suggests, Gungate would have already come forward. In actuality, the acknowledged previous difficulties in securing its delivery highlight the implausibility of Indigo's suggestion at Table 3.4 of its submission that a £149.38m comparison goods surplus exists to support additional floorspace in Tamworth at 2016.



Statement by England & Lyle of Behalf of Tamworth Borough Council (HD16)

We restrict our comments on the England & Lyle Statement to the elements that directly relate to the Gungate development.

In this regard, we have strong reservations in respect of the England & Lyle's assumption that a later implementation date for Gungate would have repercussions in respect of its turnover. The Capacity Analysis tables appended to the England & Lyle Statement calculates the turnover of Gungate at 2021 based on a sales density of £5,000 per sq.m. However, it is evident from the table on page 11 that England & Lyle consider an appropriate sales density for the Gungate scheme to be £5,500 per sq.m at 2021. The lower figure of £5,000 per sq.m is an assumed sales density at 2016. The higher figure is reflective of the fact that retailers' sales densities are likely to be higher at 2021 than 2016, and this principle is applicable to Gungate irrespective of the exact year of opening.

Henry Boot can confirm its commitment to delivering the site at the very earliest opportunity and certainly before 2021. Accordingly, as a minimum, the 2021 sales density figure of £5,500 per sq.m should be applied to the site. We would actually suggest, given that England & Lyle's Tamworth Town Centre and Retail Study Update of February 2014 (D1) indicates that existing floorspace in the centre performs in excess of this figure, it would be appropriate to use an even higher sales density in assessing how Gungate will meet comparison goods needs. This would result in a lesser level of need later in the plan period.

We also note that England & Lyle's Capacity Analysis table suggests that Tamworth can secure substantial increases in comparison goods retention even prior to Gungate's implementation. We consider the level of increased retention set out in the Capacity Analysis table to be ambitious and also likely acting to overestimate future comparison goods need.

Notwithstanding the above, we reiterate our view that the inclusion of specific long-term retail floorspace requirements within the Local Plan (at Policy EC2 and SS1, and paragraph 3.18 and 4.22) is not justified or consistent with national policy. The NPPF requires Local Plan policies to be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. As specific long term floorspace figures do not provide adequate flexibility, it is our view that their inclusion within the Local Plan does not accord with national policy.



We trust that the above is of assistance in your consideration of submissions, but we would be delighted to provide additional clarification of any one of the above matters should this be so required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Shepherd'.

Richard Shepherd
Associate Director