

Briefing Note



Tamworth Local Plan EiP

WYG's Letter of Representation, dated 6 July 2015

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1. WYG have submitted a letter of representation on behalf of Henry Boot Developments Ltd, dated 6 July 2015 that addresses the Indigo Planning Briefing Note on the Ventura Retail Park Shopping Survey (HD12a and b). We make the following comments in response to WYG's representations.
2. WYG criticise the survey, stating that it is based on an unrepresentative sample group. WYG do not explain or justify how they have come to determine that the sample is 'unrepresentative'. At the EiP, it was accepted by Mr Sheperd that the sample size is adequate.
3. It is not disputed that the survey shows that there is a considerable proportion of people travelling from outside of the Council's Study Area to the Retail Parks to shop. The TTCRSU 2014 makes no allowance for the inflow of expenditure. This is clearly wrong and it should be adjusted to account for inflow. The sample is representative of shoppers at the Retail Parks and shows an inflow of 33%.
4. Notwithstanding their 'concerns' regarding the survey, WYG seek to use the results to justify their case that the town centre needs the Gungate scheme. We do not dispute that a redevelopment of the Gungate site would benefit the town centre or that there is scope to encourage improved links between the town centre and the Retail Parks. However, there is no reason to seek to place an embargo on development elsewhere whilst Henry Boot and the Council decide what they want at Gungate.
5. WYG dispute the approach taken by Indigo Planning to benchmark the performance of existing comparison goods floorspace in Tamworth town centre to establish overtrading. WYG state that it is not necessary and that the survey results act to identify the performance level of town centre floorspace. However, elsewhere when acting for LPAs, WYG have considered it appropriate to benchmark town and city centre comparison goods turnovers for example, their recent work on the Lancaster Retail Development Strategy in January 2014 (see Tables 26 and 27, Appendix 2) and the Northumberland Town Centre and Retail Study Update from January 2013 (see Table 28, Appendix 1). Copies of these extracts are attached.
6. Indeed, in addressing the potential turnover of the Gungate scheme on the third page of their letter, WYG are applying a benchmark turnover.
7. WYG seek to cast doubt over the Indigo conclusions on overtrading and, in particular, the strong performance of the town centre comparison floorspace.

However, even leaving aside our figures, the TTCRS 2011 showed the town centre to be achieving a turnover of almost £124m¹ (the TTCRSU 2014 (D1) did not update this figure). At that time, the town centre floorspace figure for comparison goods provided by the Goad Centre Report was 233,100sqft² (21,655sqm) gross. Converting this to net floorspace³ (15,158sqm), it can be determined that the town centre floorspace was achieving a sales density of £8,164/sqm. This is more than 60% higher than the £5,000/sqm that E&L considered to be appropriate for the Gungate scheme⁴. Therefore, looking only at E&L's figures, it is clear that the town centre floorspace was trading well above expected levels. E&L have confirmed that they do not expect that shopping patterns will have materially changed since the 2011 Study⁵, so it is reasonable to assume that the town centre comparison floorspace continues to achieve very strong levels of trading.

8. Indeed, responding on the E&L Statement (HD16), WYG make this very point; that the TTCRSU 2014 (D1) shows that the town centre is trading at a higher level than £5,500/sqm.
9. Finally, WYG state that Indigo's position is illogical because if Tamworth town centre did overtrade in the manner we suggest, Gungate would have already come forward. This misunderstands the complexity of retail investment. Just because existing stores overtrade, it does not mean that retailers will automatically invest. There are a great many considerations to be taken into account before new retail schemes come forward, including the return on capital invested, market profile, existing constraints, etc. However, as the figures in paragraph 7 (above) shows, the Council's evidence base demonstrates that the town centre comparison floorspace is achieving very strong levels of trading. That Tamworth is a healthy centre, but Gungate has not come forward does suggest that there are other reasons why Gungate has not come forward. The health of the town centre is acknowledged by WYG in the Planning Statement supporting the current application on behalf of Sainsbury's (EiP document HD17).

Indigo ref. bfn.7.SM.E15-331, date 14.07.15

¹ See Appendix 7B, TTCRS 2011

² See Appendix 2, TTCRS 2011

³ Using a 70% net:gross ratio

⁴ See Appendix 8B, TTCRS 2011

⁵ See paragraph 1.5, TTCRSU 2014