

Brighton & Hove City Council

For general release

Meeting: **Planning Applications Sub-Committee**

Date: **17 March 2004**

Report of: **Director of Environment**

Subject: **Consultation response to Adur District Council regarding
proposed extension to Tesco, Holmbush Centre,
Shoreham-by-Sea**

Wards affected: **All**

1. Purpose of the report

- 1.1 To advise members of a planning application to extend the Tesco store at the Holmbush Centre, Shoreham-by-Sea and to seek endorsement of the response sent by officers.

2. Recommendations

- 2.1 That members of the Planning Applications Sub-Committee:
- 2.2 Note the proposals at Tesco, Holmbush Centre, Shoreham-by-Sea.
- 2.3 Endorse the letter sent by officers objecting to the proposal on the grounds set out in Section 4 of this report.
- 2.4 Give officers delegated powers to respond directly to Adur District Council on transport and traffic implications, once the Transport Assessment has been received.

3. Background

- 3.1 This application proposes to extend the existing Tesco store into an area currently used for servicing and staff car parking, on the western side of the site. The proposals seek to extend the store by 1,787 sq m net floorspace, from 5,251 sq m net. This represents an

increase of approximately 34% sales floorspace. The proposal would also significantly reduce the number of shoppers' car parking spaces from 1723 to 860.

- 3.2 In support of the case, the applicant states that the additional floorspace would be used to enhance the existing offer of the store by expanding the ranges of goods sold, especially in non-food departments. Almost 60% of the additional space will be given to the sale of non-food ranges such as home entertainment, baby goods/clothing, adult clothing, homeshop and seasonal special offers. A small increase of floorspace will be made to the sale of food goods, and an in-store café and customer toilets are proposed.

4. Further information

The primary issues relating to this proposal are the impact of the proposed extension on surrounding town, district and local shopping centres and the traffic generation that this proposal could generate.

Retail Issues: The proposal is contrary to current and emerging national Planning Policy Guidance note 6 for retail and town centres (PPG6 and PPS6, respectively), and would be contrary to the Brighton & Hove Local Plan Second Deposit Draft. In summary, the main issues of retail planning policy objection relate to:

- The composition of the proposal – there is a large non-food element proposed that will compete directly with Brighton & Hove's existing shopping centres and other retail premises;
- The lack of reference to latest national planning policy guidance on extensions to existing retail development, which requires a clear demonstration of need and impact; and
- A lack of reference to recent foodstore developments, planning approvals and current proposals in Brighton & Hove.

Traffic Issues: Officers have expressed broad concerns about the transport and traffic impact of this proposal. Adur District Council will be sending a copy the Transport Assessment for consideration by Transport Officers, who will make detailed comments on the transport and traffic implications. As out of town foodstore, and any proposal to extend Tesco is likely to lead to increased numbers of car-based trips, drawing more customers along already busy roads

and away from existing town centres, which are more accessible by all means of transport.

A letter was sent to Adur District Council on 12 February 2004 setting out these concerns. A copy is included as Appendix 2 of this report. In conclusion, it is recommended that at this stage Brighton & Hove City Council object to the proposal on the grounds of lack of demonstrated need for the proposals and the potential retail impact on defined shopping centres and food and non-food retail stores in Brighton & Hove. The proposal is contrary to national and local planning policies for new retail proposals and extension to existing retail stores. Detailed comments on traffic and transport impact will be sent to Adur District Council upon receipt of the Transport Assessment.

5. Consultation

5.1 None required.

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Financial implications

There are no direct financial implications for the City Council arising from the objection to the planning application. *Finance Officer consulted: Steve Linnett, 26 February 2004.*

Legal implications

There are no legal/human rights implications arising out of the proposal. *Lawyer consulted: Alison Gatherer, 27 February 2004.*

Corporate/Citywide implications None identified.	Risk assessment None identified.
Sustainability implications The proposal, by increasing the level of out of town retail floorspace, conflicts with the council's sustainability objectives and could have a harmful impact on the environment due to increased traffic generation and encouraging use of the car.	Equalities implications None identified.
Implications for the prevention of crime and disorder None identified.	

Background papers

1. Details of planning application reference SU/12/04/TP
2. Planning Policy Guidance Note 6 (PPG6) Town Centres and Retail Developments
3. Draft Planning Policy Statement 6 (PPS6) Planning for Town Centres
4. Brighton & Hove Local Plan Second Deposit Draft, 2001.

Contact Officer

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APPENDIX 2

K Morgan Esq
Planning and Policy
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Date: 12 February 2004

Our Ref: PP/LC /

Your Ref: SU/12/04/TP

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Dear Mr Morgan

**EXTENSION ON SOUTH-WEST SIDE OF SUPERSTORE WITH RELOCATION OF SERVICE YARD & ASSOCIATED WORKS (INCL. RECYCLING CENTRE)
TESCO SUPERSTORE, HOLMBUSH CENTRE, SHOREHAM-BY-SEA**

Further to your letter of 29 January 2004, which enclosed a copy of the Montagu Evans Planning & Retail Statement, October 2002, I am pleased to set out my response to the above application. As a major out of town retail development, these comments may need to be endorsed by Members of our Planning Applications Sub-Committee, in which case I will contact you with further comments. The format of my response follows the structure of the Montagu Evans (ME) report.

General comments

Sections 1 to 4 of the report set out the planning history of the site and describe the proposals. I understand that a Transport Assessment has also been submitted, which I have not had sight of. Nevertheless, drawing number F/EXT/220/SK07, Rev. F shows a large reduction in car parking spaces, from 1723 to 860. Having read the decision notice included at Appendix A of the ME report, I note that Condition 7 requires that all parking, access, servicing and pedestrian access shall be kept available at all times and shall not be obstructed by any future development nor storage/display of any items.

Reading the Committee Report, it is clear that the statutory requirement for spaces at the time of the original Tesco/M&S proposal was 1851 spaces, but it was considered that 1808 spaces would be sufficient, bearing in mind joint usage of the stores. The drastic reduction in car parking spaces that appears to be proposed in the drawing would not be in accordance with condition 7 of the original planning permission.

There are likely to be significant implications for trip generation and traffic generation as a result of this proposal, which I presume are addressed in the Transport Assessment. It would be beneficial to have sight of a copy of this assessment in order that our Traffic Officers can provide more detailed policy comments, and consider the potential impact of the scheme in traffic terms.

The proposals

Paragraph 4.1 refers to the customer congestion that can occur at peak periods. While this proposal will increase the internal circulation space of the store, wouldn't a reduction in car parking space further exacerbate congestion?

The proposal is clearly aimed at primarily extending the range of non-food goods to be sold from the store. My initial view is that this could have an even greater impact on the vitality and viability of surrounding town centres, including several within Brighton & Hove, than an extension to accommodate purely convenience goods. I expand on these concerns below.

Planning policy

You will obviously alert ME of any changes that may have occurred to Adur's planning policy since this report was written over a year ago. Brighton & Hove City Council has policies in its Second Deposit Draft plan which require applications for new retail development in out of centre locations to provide robust justification on impact, accessibility, need and the sequential test. In terms of national planning guidance, this section of the ME report does not include recent guidance provided by the Ministerial statement of 11 April 2003 and draft PPS6, published in December 2003. Both of these contain important references to the emerging national policy stance on retail development in town centres, which should be addressed by the applicant.

The latest guidance in draft PPS6 should be incorporated into this report and supplement the Planning Policy section. Paragraph 3.31 of this document relates to an assessment of extensions to existing development. It states that, "*the impact on the town centre of the proposed extension should be given particular weight if new and additional classes of goods or services for sale are proposed.*" This is clearly significant in terms of the additional types of non-food ranges proposed to be sold. References to the Hambleton case at 5.25-5.29 of the ME report have also been superseded by the draft guidance.

Draft PPS6 also advises that local planning authorities should establish that the evidence presented on need for further floorspace relates specifically to the class of goods proposed to be sold. There is no specific need or capacity assessment or justification in the ME report. While a sequential approach has been applied to the extension, draft PPS6 does not consider that it is a relevant consideration. Accessibility is, however, a material consideration, and this issue should be addressed in the Transport Assessment.

Existing foodstore provision

Section 6 of the ME report looks at larger foodstore provision in the catchment area, which covers a large part of Brighton & Hove. The report is now somewhat out of date and excludes some key developments and commitments, which will significantly affect the quantitative capacity for the proposed extension. These include the new Tesco stores on Church Road, Denmark Villas and Holland Road, Hove, and planning permission for Sainsbury's at Brighton Station. There are also stores on London Road and Lewes Road that should be accounted for, and a proposal to extend Sainsbury's at Hangleton. It is not justified in the report why only the larger stores are examined.

Survey work

The telephone survey is now out of date, as it was conducted in July 2001 and would not have taken account of recent foodstore developments in the Brighton & Hove part of the catchment area (see paragraph above). I also have a query about the survey itself: at Q13 and Q2, there are responses that demonstrate levels of non-food shopping at Tesco and M&S, Holmbush. However, responses to Q30-38 only refer to M&S. Does this mean that absolutely no respondents currently use the Tesco store for non-food shopping purposes? I can't believe that this would be the case.

Need

This section relates only to the qualitative need for extension of the existing store. The quantitative capacity for the store is not explicit in this report, and has not been addressed at all in this section, and should be re-assessed in light of my previous and subsequent comments. The McNulty statement of April 2003 and draft PPS6 have placed a much stronger emphasis on the need for a quantitative need case to be demonstrated.

Sequential approach

It is obviously for the local planning authority to determine whether the sequential site approach has been satisfied. Brighton & Hove, to my knowledge, were not approached for details of potentially sequentially preferable sites in our part of the proposed store's catchment area. However, draft PPS6 considers that the sequential approach is not a relevant consideration in relation to extensions to existing retail developments. Nevertheless, the local planning authority should have regard to the accessibility of the proposed development.

Economic implications

As referred to above, this section deals solely with the economic impact of the proposal, and not to the capacity of the catchment area to support the extended store (i.e. the demonstration of need). The impact analysis does not consider the impact of the proposed extension on several defined centres in Brighton & Hove, including Hove Town Centre and the Local Centres of Mill Lane, The Grenadier, Richardson Road, Portland Road and Beaconsfield Road, all of which are within the proposed catchment area of the store. These centres should also be taken into account in an assessment of retail capacity. Boundary Road/Station Road Town centre has been accounted for to some extent in the report, but a fuller examination of impact, and in particular cumulative impact on this centre (discussed below) is required.

The cumulative impact of the proposal on existing stores and centres, combined with other proposals and commitments, has not been assessed. We are currently considering an application to extend to the out of centre Sainsbury's store at Hangleton, and there is planning permission for another large Sainsbury's foodstore as part of the Brighton Station redevelopment. These both fall within the catchment area of the Holmbush extension proposal, and should be taken into account in the impact assessment.

The following comments are linked to the relevant paragraphs of the ME report:

Ref.	Comment
11.2	The survey material is no longer up to date
11.3 - 11.5	As advised by the McNulty statement, April 2003 and draft PPS6, the projected growth in expenditure should be related to the class of goods proposed. Therefore the use of business-based growth trends is incorrect. It is recognised good practice for assessments to be carried out with regard to goods-based growth trends.

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11.7	Design year of 2003?
11.1 1	The price base could be updated to provide a more accurate forecast.
11.1 8	The design and forecast years appear to be short term, and should be justified. Because the assessment was written almost a year and a half ago, it would make sense to adjust the design and forecast years accordingly.
11.2 1	<p>Would the Data Consultancy now have more recent expenditure estimates available?</p> <p>It is good practice to use ultra-long term as opposed to long-term growth rates. The use of the latter should be justified.</p> <p>As referred to in paras. 11.3 to 11.5, expenditure growth should be calculated according to goods-based estimates (which have a lower, more realistic rate of growth for convenience goods).</p> <p>Applying a convenience business based approach double-counts the non-food provision that is incorporated into these types of businesses as a matter of course. This is apparent at para. 11.40.</p>
11.2 5	<p>The calculations assume that there is 100% trade retention within the catchment area, and an allowance for further inflow is made at 11.26. This requires justification, and could over-estimate the amount of expenditure available.</p> <p>The turnover of several more foodstores needs to be incorporated into the calculations, as referred to in my earlier comments.</p> <p>The sector analysis extends beyond the 15 minute drive time isochrone, and will over-estimate the catchment expenditure available.</p>
11.6 1	<p>... and elsewhere. I find it very difficult to link the results of the household survey to the assumptions made on spending in the catchment. I find it equally difficult to read tables 11 to 13 in the economic analysis at Appendix G, in relation to the proposed turnover of the extension. While Table 13 states that the convenience turnover will be £1.37m, calculating this figure from Table 12 appears to give a higher turnover ($\text{£}12,493 \text{ psm} \times 253 \text{ sqm} = \text{£}3.16\text{m}$). This would benefit from clarification.</p>

Summary

There are several areas of the ME report that require updating and clarification. In particular I have concerns about the:

- loss of car parking and traffic generation;
- composition of the proposal (i.e. large non-food element);

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- omission of clear references to latest national planning policy guidance on extensions to existing retail developments;
- lack of reference to recent foodstore developments, commitments and proposals in Brighton & Hove;
- out of date household survey results;
- lack of demonstration of the quantitative need for the proposals;
- several assumptions made in the economic analysis.

As it stands, the proposal raises several issues regarding the potential impact of the development on defined town centres and food and non-food retail stores in Brighton & Hove. It should be supported by an up-to-date analysis of the need for and impact of the proposed extension, as detailed in my comments above.

I will feedback to you at the earliest opportunity any further comments arising from the Planning Applications Sub-Committee. Please do not hesitate to contact me should you wish to discuss my comments or anything else relating to this application.

Yours sincerely

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