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Report

SUBJECT: Planning application S/2007/1865 for the erection of a new food superstore including landscaping and parking.

at 140 London Road Amesbury

REPORT TO: Planning and Regulatory Panel

DATE: 20th May 2008

AUTHOR: Adam Madge, Principal Planning Officer

Reason for Report:

To consider a full application for the demolition of existing buildings on site and the redevelopment with a class A1 Foodstore with associated parking and landscaping and alterations to access.

The application has been brought before the Planning and Regulatory Committee because it is considered that the proposal is likely to have an effect outside of the boundaries of the Northern area of the district. The Northern Area Committee considered the previously circulated report of the Head of Development Services (included in an amended version below) at the meeting on 8th May 2008 and the Committee made the following recommendation:



INVESTOR IN PEOPLE



CUSTOMER SERVICE EXCELLENCE



Awarded in:
Housing Services
Waste and Recycling Services



Recommended to the Planning and Regulatory Committee –

(1) That, the above application be **APPROVED** for the following reasons:

- (i) There is an identified need for another supermarket within Amesbury and it is considered that there is no current site to meet the identified need within the town centre.
- (ii) It is considered that the impact would not damage the town centre by reason of the beneficial clawback in trade to Amesbury that would result and the town centre's role and future as a speciality retail centre. The proposal will therefore comply with saved policy G1 of the adopted Salisbury District Local Plan.
- (iii) The proposal would not be detrimental to employment and does not conflict with policy E16 as it would provide a significant number of jobs and would provide improvements to the local environment that outweigh the loss of jobs at the site
- (iv) The design of the proposal is considered acceptable in its context.
- (v) The proposal will make good use of a brownfield site.
- (vi) The proposal complies with policy DP6 of the approved Wiltshire and Swindon Structure Plan in that the financial contributions towards pedestrian/cycle route improvements, pedestrian crossings and a bus service promote sustainable travel to the site and reduces the need to travel to other supermarkets outside of Amesbury.

The minutes from the Northern area had not been agreed at the time of writing and therefore the S106 provisions and conditions which Northern area wished to see attached to any planning approval will follow as late correspondence.

These are generally in accordance with the requirements of statutory consultees and included

- 1) A scheme for the improvement of the Holders road/London road junction.
- 2) A scheme for the access to the site for delivery vehicles being from the A303 Solstice Park junction and not from London road/Countess road.

Members should note that should they wish to vote to approve this application it would need to be referred to GOSW under the terms of the shopping directive

The following is the report to Northern area updated to include late correspondence in italics

Members should note that should they wish to vote to approve (or refuse) this development the application would need to be brought before the councils planning and regulatory committee because it is considered that the impact the proposed store would have would go beyond that of the Northern area boundaries. Members should also note that should the council wish to approve the application it would need to be referred to the Secretary of State under the terms of the Shopping Directive.

REASON FOR REPORT TO MEMBERS

HDS does not consider it prudent to exercise delegated powers

SITE AND ITS SURROUNDINGS

The site is partly that of a former transport and haulage depot and partly a number of other industrial buildings located to the North of Amesbury on what was previously railway land. The site also includes 6 houses known as railway cottages which sit at right angles to London Road.

The largest building on site is that of the former transport depot which is of two storey height and clad in corrugated steel. This has a large parking and loading area situated to the front of it and is accessed past Railway Cottages from London Road.

The cottages, which date from the early Edwardian period, are typical of the area being two storey red brick under a simple tiled roof. Parking for the cottages currently takes place in the access way to the transport depot.

To the rear of the transport depot is an existing ambulance station and council gritting yard along with a number of other smaller industrial and light industrial units predominately of brick or steel clad construction again of two storey height.

The surrounding area to the site is in part residential and part employment use. Directly to the East of the site is the large and very prominent Naafi site now called the Minton Distribution Park which is used for a variety of storage and employment uses.

To the rear of the site is Wiltshire County Council's recycling centre. The main centre serving Amesbury.

To the west of the site lies a residential area of 1950's terraced and semi detached properties of brick and render construction. Houses situated on James Road back onto the site with their rear gardens.

At the front of the site (North) is London Road and beyond that further industrial and distribution buildings.

THE PROPOSAL

The proposal is for the erection of an A1 retail foodstore of 5564 square Metres with an additional 461square metres of under cover delivery area. It includes car parking and landscaping.

In more detail the proposal includes the provision of a new roundabout at the front of the site to provide the main access to the store, access to two existing garages and a changed

access to existing industrial buildings on the opposite side of London Road. This roundabout leads into the main parking area.

There are 358 parking spaces in the car park. 20 of these spaces closer to the store will be reserved for customers with disabilities, whilst a further 16 spaces would be reserved for parent and toddlers. Included in the parking area is an area for recycling.

Running along the North Eastern boundary is an access road to the rear delivery yard which is part single vehicular width part two vehicle width. This will be operated on a traffic light control system.

The building itself is a two storey building extending to eight metres at its highest point. It is set down from the surrounding land by varying amounts. The store is of a modern architectural appearance with full height glazing to the front and part South West and part South East elevations. Further high level glazing is shown on the other elevations. The building is shown as being clad in a white cladding.

To the rear of the store is a bulk storage area and main loading and unloading bay. A turning space for vehicles is provided in the rear yard.

Internally on the ground floor is the main sales area including customer toilets, a bakery and the bulk storage area.

There is an additional 'mezzanine' or first floor level which includes a customer café, staff canteen and other staff and office areas. An area is also set aside internally for a combined heat and power plant.

PLANNING HISTORY

90/1059	Change of Use ie: Intensification of existing use for the manufacture of Fibre glass products to General Industrial use at 174 London Road	R	20.09.90 Appeal WD18.03.91
90/23ENF	Enforcement Notice against Change of Use from Class B1 (business) to class B2 (general industrial) at Land at 174 London Road		Effective from 31.01.90 Period of time 12 months
91/0300	Appeal against Enforcement Notice to cease use of building for any purpose other than a use within class B1 at 174 London Road	WD	18.03.91
98/1277	Change of Use from Industrial to Car & Van Hire plus administration for the company at 174 London Rd		AC 08.09.98
99/0546	Change of Use from Car & Van Hire to B1 (light		

	industrial) & B2 (warehouse) No 174 London road		
99/0702	Cladding of existing building in Heritage Green with APFP flashings in Poppy red No 174 London road		14/06/99
02/2174	Demolition of existing building and redevelopment for Residential	WD	3. 01.03
03/1052	Change of use from B1 to B2 No 174 London road	AC	26.06.03
05/0252	Outline planning permission for demolition of existing Building and redevelopment of part of site for residential	WD	25.04.05
05/0254	Outline planning permission for demolition of existing Building and redevelopment of part of site for residential	WD	25.04.05
05/1290	Outline application for demolition of existing building and redevelopment of part of site for light industrial (B1) use	Refused	25.8.05
05/1291	Outline application for demolition of existing building and redevelopment of part of site for residential use (20 dwellings) and associated works	Refused	25.8.05
05/1543	Erection of six bay vehicle garage. No 170 – 172 London rd	Approved	Approved 23.9.05

CONSULTATIONS

WCC Planning (Original letter) – The application relates to the redevelopment of a site located on the edge of Amesbury within its urban area as indicated by the Housing Policy Boundary defined in the Salisbury District Local Plan (Adopted June 2003). The site is not identified for any particular use in the Local Plan and currently comprises mainly of employment uses. The covering letter to the application indicates that the net floorspace is for 3,853 sq m of which 3,372 sq m comprises net retail floorspace (2,972 sq m retail sales area plus 400 sq m checkout space).

It is noted that the recently completed Salisbury District Council Retail and Leisure Needs Study 2006 (2006 Study) considers there to be no need for additional net convenience floorspace at Amesbury by 2011 or 2016. However there is an overall need within the District of 1,516 sq m net convenience floorspace, rising to 2,623 sq m in 2016. Paragraph 8.55 of the Study recognises that this is based on current market shares.

The Executive Summary of the 2006 Study, notwithstanding the concern of unacceptable impact on Amesbury Town Centre, does recognise that Amesbury could support additional foodstore development through claw back and uplift in market share and generate more sustainable travel patterns (paragraphs 52 to 55). This approach would be in line with Policy DP3 of the Wiltshire and Swindon Structure Plan 2016 (Adopted 1 April 2006) that seeks to provide for appropriate level of services and facilities in all settlements to promote more sustainable communities and reduce the need to travel (paragraph 4.9). In principle therefore

additional convenience retailing at Amesbury, as the District's principal settlement outside of Salisbury City, should be supported. Amesbury is relatively well placed to enable the main food shopping needs of surrounding rural communities to be met more locally thus minimising the need to travel longer distances to other destinations.

Notwithstanding the above, the application site is an out of centre location and as such must meet the tests of Planning Policy Statement 6: Planning for Town Centres (PPS6) as set out in paragraph 3.4, in line with policy DP6 of the Structure Plan. A retail Assessment has been prepared by G L Hearn and submitted in support of the application that seeks to meet the requirements of PPS6. However, I am concerned that the Retail Assessment is not sufficiently robust, for the following reasons:

Given the proximity of Salisbury to the South of Amesbury, Tidworth and Andover to the East and Devizes to the North West, the defined catchment area is considered to be too large.

Convenience goods expenditure per head of between 1,727 and 2053 in 2011 are used compared to levels of between 1,427 and 1,710 in 2011 for comparative zones (zones 1, 2 and 6) within the 2006 Study. This indicates that available expenditure could be overestimated.

The proposal is essentially justified on the basis of what is considered by the GL Hearn to be a reasonable uplift in market share from within the catchment area, from 22% to 48% (paragraph 5.16). This effectively increases the market share of Amesbury within the catchment area by 218%. This is considered high, particularly in light of the concern already expressed about the extent of the catchment area and new Tesco being developed at Tidworth.

The new Co-op in Amesbury had only been trading for a short period when the household survey was undertaken. A longer settling in period may have provided different survey results in terms of the effect of the new store on the town centre. For instance, additional convenience stores to those identified in the RA were noted following a recent visit to the town centre.

Paragraphs 6.1 to 6.3 do not adequately justify the overall scale of the development. A smaller store would be more appropriate to the role and function of Amesbury and still enable claw back to be achieved while minimising risk of harm to the town centre.

It is not considered that sufficient flexibility has been demonstrated in applying the sequential approach (section 7). For example, further consideration could be given to the scope for disaggregation of convenience and comparison elements of the proposal and the potential to assemble a site around the former Co-op store that is currently vacant.

Although the Tesco at Tidworth is mentioned within the Assessment, only limited consideration has been given to how this is likely to change the nature of retail activity within the catchment area. Only the effect on Zone 3 that is tightly defined around Tidworth has been considered when the impact is likely to be wider.

In summary while in principle it is accepted that additional retail development at Amesbury could achieve greater levels of trade retention there is some concern about the size of the store proposed in relation to Amesbury and the overall robustness of the Retail Assessment as submitted.

(Second letter)

The County Council as strategic planning authority responded to the application as originally submitted in the letter dated 30th October 2007. This letter raised a number of issues about the robustness of the Retail Assessment including the need to give further consideration to the sequential approach and the overall size of the store in relation to the role and function of Amesbury. As you are no doubt aware, in assessing retail planning applications paragraph 3.4 of PPS6 requires, inter alia, that the development should be of an appropriate scale and that there are no more central sites for the development.

It is understood that an application has recently been submitted to Salisbury District Council for a town centre store of around 1,858 sq metres net retail floorspace. This indicates that a more central site is available for retail development at a scale more appropriate to the role and function of Amesbury that is better placed to support the vitality and viability of the town centre. It is understood that the application is not speculative and is being progressed by a named operator thus providing a good degree of certainty that the site is viable from the market perspective.

In light of the above consideration, the proposed development would be contrary to Policy DP6 of the adopted Wiltshire and Swindon Structure Plan 2016 (April 2006). In line with PPS6, this seeks to maintain and enhance the role of Amesbury's town centre by making appropriate provision that promotes its vitality and viability and only making provision for out of centre sites where need cannot be met on more central sites. Accordingly, the County Council as strategic planning authority raises an objection to the application.

WCC Highways -

(2nd letter)

I have raised concerns about the orientation of the store from the outset and those concerns remain. As I stated previously, contemporary guidance¹ advises against proposals that place foodstores at the rear of sites, especially those that put car parks at the front thereby introducing a significant barrier for all but car users. Pedestrians, cyclists and public transport users are therefore particularly disadvantaged. This has been raised frequently with the applicant but they do not wish to modify the proposals.

A VISSIM model² has been submitted previously and a base year model (which is based on observed traffic flows) has also now been submitted. The Design Manual for Roads and Bridges (DMRB) guidance sets out what is required in order to make sure a model of this type is robust. Initially the base year traffic model is set up; this then must be validated by comparing the model with queue length and journey time surveys. When this is sufficiently robust, future year models can be created. The base year model has now been submitted by ADL but because queue length and journey time surveys were not also undertaken at the same time as the traffic surveys, the model has not been validated in line with standard guidance. We therefore cannot be sure that the model is reliable and therefore cannot be sure that the assessments of the junctions are reliable.

The main area of concern for us with this application is the traffic signals at the A345/London Road junction. This junction nears capacity at peak periods now so would therefore be very sensitive to increases in traffic. Detailed LINSIG modelling for this junction has been undertaken and extensive discussions have occurred between ADL and our consultants, Mouchel. The most recent analysis of

¹ Planning for Public Transport in Developments - IHT

² A micro-simulation tool which covers a whole section of the local network and allows the user to display and visualise complex traffic flow in a clear graphical way

the model by Mouchel suggested that, with some corrections to ADL's work, it would be possible to modify the junction so at most times it can function better with the TESCO traffic in a future scenario than the existing junction would without the TESCO traffic. We are therefore satisfied that the junction modification proposed by ADL would sufficiently cater for the additional traffic.

In addition to the above, we also have some concerns about the site access junction, which comprises a 4 arm roundabout. In order to avoid using land to the north the applicant has "pulled" the roundabout south into the development site to such an extent that the proposed central island lies outside the existing carriageway. Although I understand that the agent has been asked to design something within constraints, the best that he has managed to achieve is a severely offset junction with a number of departures from standard and/or best practice. One of the most serious areas of concern in designing any roundabout is to ensure that a "racing line" through the junction is not created. This is avoided by making sure that the entry and exit routes for all movements achieve certain radii, creating what the design manual defines as "deflection". The manual advocates that deflection is

"...the most important determinant of safety at a roundabout as it governs the speed of vehicles through the junction and whether drivers are likely to give way to circulating vehicles..."³

A revised junction design has been submitted but the deflection is still insufficient. My conclusion therefore is that the junction arrangement is unacceptable.

In conclusion, I recommend that the application is refused for the following reasons:

The applicant has not supplied sufficient information to show that the traffic likely to be generated by the development could be accommodated without detriment to the wider road network

The roundabout proposed to access the store falls short of a reasonable minimum standard, to the extent that the safety and convenience of existing and future road users would be compromised.

The proposed orientation and siting of the building at the rear of the site is such that it introduces a barrier to non-car users by producing an avoidable conflict with cars entering exiting and circulating the proposed car park contrary to saved policy G1 of the adopted Salisbury District Local Plan and contemporary best practice

If you are minded to approve the applications, I would suggest the following conditions should be applied:

No development shall take place until detailed schemes for the upgrading of the A345/London Road and London Road/Porton Road, which, for the avoidance of doubt shall include any Traffic Regulation Orders, have been submitted to, and agreed in writing by the LPA.

Reason: In the interests of highway safety and servicing of the site.

No development shall take place until a detailed scheme for site accesses, both vehicular and pedestrian/cyclists, have been submitted to and agreed in writing by the lpa.

Reason: In the interests of highway safety and accessibility.

³ Design Manual for Roads and Bridges. Chapter 7, paragraph 7.51

No development shall take place until a comprehensive programme for the undertaking of the off-site works, including the processing of any Traffic Regulation Order, has been submitted to and approved in writing by the lpa, and the highway works and other requirements shall be provided and undertaken strictly in accordance with the approved programme or any changes to the programme as may subsequently have been agreed by the lpa.

Reason: In the interest of ensuring that the site is adequately served at the appropriate time.

Prior to occupation of the site, a Travel Plan is to be agreed in writing by the Local Planning Authority.

Reason: In the interests of promoting sustainable travel

In addition to this, the following contributions should be secured (these have been agreed with the applicant):

- 1. £55,000 for a period of 5 years to provide a new bus service round Amesbury (total £275,000)*
- 2. £50,000 for improving pedestrian and cycle access to the site.*

1st letter

I have raised concerns about the orientation of the store from the outset and those concerns remain. Contemporary guidance advises against proposals that place foodstores at the rear of sites, especially those that put car parks at the front thereby introducing a significant barrier for all but car users. Pedestrians, cyclists and public transport users are therefore particularly disadvantaged. This has been raised frequently with the applicant but they do not wish to modify the proposals.

The initial application (S/07/1865) was submitted with a number of individual junction assessments having been undertaken. As with the Solstice Park ASDA application, it was felt necessary for the applicant to submit a wider model covering the local network which would check the functioning of the network as a whole, including the interactions between the junctions. Although not supplied with the original Transport Assessment, a VISSIM⁴ model was later submitted by the applicant's agent for consideration.

The main junction of concern with this application is the traffic signals at the A345/London Road junction. This junction nears capacity at peak periods now so would therefore be very sensitive to increases in traffic. There have been considerable discussions with the consultant to try to produce a revised junction design here but it has not yet been possible to agree a design which was felt to be both safe and with sufficient capacity.

The VISSIM network model has been considered by our consultants, Mouchel, and they have said they do not feel it to be robust. The Design Manual for Roads and Bridges (DMRB) guidance sets out what is required. Initially a base year traffic model (which is a model based on observed traffic flows) is set up; this is then validated by comparing the model with actual traffic behaviour (eg queue lengths, journey times) and when this is sufficiently robust future

year models can be created. We have serious concerns with the modelling in that a base year traffic model and a detailed validation report have not been produced.

Discussions have also been held on other issues such as public transport services, pedestrian and cycle facilities and the main site access but final agreement has not yet been reached on these as the focus has been trying to resolve the issues with modelling.

Given these serious concerns, I am not yet satisfied that the impact on the surrounding network could be adequately catered for. I would therefore recommend that the applications are refused for the following reason:

Insufficient evidence has been submitted to demonstrate that the traffic generated by the proposed development would not have an unacceptable effect on queues delay and safety on the local highway network.

Highways Agency

The Highways Agency previously reviewed this application in October and December 2007. We concluded that it was content that the proposed development would have no adverse impact on the Strategic Road Network. We directed a planning condition to be attached to any planning permission which may be granted to provide a travel plan with updated information as specified by us.

Bus Service Information

The Highways Agency required additional information regarding extra bus services. The applicant has provided this information in Paragraph 4.1.8 of the Non-Technical Summary. Developer contributions of £250,000 have been detailed by the applicant for a new off-peak local bus service to serve the site, local employment and residential areas. We are content with these details and do not require any further information.

Travel Plan

An updated Travel Plan is required by the Highways Agency with additional points on Travel Plan targets, measures and enforcement mechanisms. This is conditioned under the grant of planning permission; we would like to be consulted with any additional information and the status of the Travel Plan.

Conclusions

Having reviewed the additional documentation, the Highways Agency is content with the updated information. We would like to be kept informed of any updates to the Travel Plan which is directed under a planning condition with any grant of planning permission.

WCC Library/ Museum - As part of the previous planning application on the above site a series of ground investigations were made across the site. These identified the infilling of railway sidings after their closure in 1961.

The depth of infill shown in the ground investigations indicate that it is extremely unlikely any archaeological features will survive in the area. I therefore have no comments to make on the application.

Wessex Water Authority -

Foul Drainage-There is a public foul sewer in the vicinity of the site.

There is a possibility of public sewers crossing the site which currently serve Railway Cottages.

The foul sewerage system should have adequate capacity to serve the proposals, however flow calculations to be submitted in due course.

No trees/large shrubs to be planted within 6m of public sewers.

Surface Water Drainage - There is no public surface water sewer in the vicinity of the site.

The use of soakaway/SUDS system should be possible.

No trees/large shrubs to be planted within 6m of public sewers

Sewage Treatment-

There is sewage treatment capacity available.

There is adequate capacity at the terminal pumping station.

Water Supply-

There are water mains in the vicinity of the site which have the capacity to serve this development.

There are water mains crossing the edge of the site, normal easements to be maintained.

Environment Agency - We have no objection to the proposed development subject to the following conditions and informatives being included in any planning permission granted.

Flood Risk

We can confirm that the Flood Risk Assessment (FRA) is considered to meet the requirements of Planning Policy Statement 25- Development and Flood Risk (PPS25) and that the proposed development is in accordance with the guidance contained therein.

CONDITION

No development approved by this permission shall be commenced until a scheme for the provision and implementation of a surface water run-off limitation has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved programme and details.

REASON:

To prevent the increased risk of flooding.

INFORMATIVE

The surface water run-off limitation scheme should be designed to ensure that a 1 in 100 year event, including an allowance of 20% increase in peak rainfall intensity, as set out in Table B.2 of PPS25 for climate change over a 60 year design life, is managed on site without putting assets at risk.

The Environment Agency does not accept any liability for the detailed calculations contained within the FRA. This letter does not constitute approval of those calculations nor does it constitute the Environment Agency's consent or approval that may be required under any other statutory provision, byelaw, order or regulation.

Flood risk cannot be eliminated and is expected to increase over time as a result of climate change, this letter does not absolve the developer of their responsibility to ensure a safe development.

Groundwater and Contaminated Land

Thank you for the submission of the 'Combined Phase I and Phase II Environmental Assessment report (Delta-Simons, September 2007). The report provides a useful introduction to the environmental setting and contamination condition of the site.

We note that some parts of the site were inaccessible at the time of the above investigation, including existing above- and under ground storage tanks. We concur that subsequent to appropriate intrusive investigation of these areas QRA and remediation may be required. Therefore we request the following condition.

CONDITION:

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a scheme to deal with the risks associated with contamination of the site shall be submitted to and approved by the local planning authority. That scheme shall include all of the following elements unless specifically excluded, in writing, by the Local Planning Authority.

- 1. A desk study identifying:
All previous uses
Potential contaminants associated with those uses
A conceptual model of the site indicating sources, pathways and receptors
Potentially unacceptable risks arising from contamination at the site.*
- 2. A site investigation scheme, based on (1) to provide information for an assessment of the risk to all receptors that may be affected, including those off site.*
- 3. The results of the site investigation and risk assessment (2) and a method statement based on those results giving full details of the remediation measures required and how they are to be undertaken.*
- 4. A verification report on completion of the works set out in (3) confirming the remediation measures that have been undertaken in accordance with the method statement and setting out measures for maintenance, further monitoring and reporting.*

Any changes to these agreed elements require the express consent of the local planning authority.

REASON:

To protect controlled waters from pollution

CONDITION

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters.

REASON:

To protected controlled waters from pollution

The report has identified areas of potential contamination which require further investigation and assessment in order to understand the implications for controlled waters. We would welcome the opportunity to consider the findings of appropriate further works in due course. The following condition is considered appropriate, based on the identification of potential contamination sources which require further investigation:

Activities carried out at this site may have caused contamination of soil, subsoil and groundwater present beneath the site and may present a threat to nearby surface waters, especially as a result of the proposed development.

This practice is considered important so that the site operator/owner, the regulatory authorities and other parties, such as the general public, potential purchasers or investors, can have confidence in the outcome, and any subsequent decisions made about the need for action to deal with any contamination at the site.

The Environment Agency recommends that developers follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination when dealing with land affected by contamination. It provides the technical framework for structured decision-making regarding land contamination. It is available from www.environment-agency.gov.uk

The Environment Agency also recommends that developers use BS 10175 2001 Investigation of potentially contaminated sites- Code of Practice as a guide to undertaking the desk study and site investigation scheme.

The submitted report is considered to fulfil(1), further works are required to fully assess the site.

Construction Environmental Management Plan (CEMP)

CONDITION

No development approved by this permission shall be commenced until a Construction Environmental Management Plan, incorporating pollution prevention measures, has been submitted to and approved by the Local Planning Authority. The plan shall subsequently be implemented in accordance with the approved details and agreed timetable.

REASON:

To prevent pollution of the water environment

INFORMATIVE:

Safeguards should be implemented during the construction phase to minimise the risks of pollution and detrimental effects to the water interests in and around the site.

Such safeguards should cover the use of plant and machinery, oils/chemicals and materials; the use and routing of heavy plant and vehicles; the location and form of work and storage areas and compounds and the control and removal of spoil and wastes.

We recommend referring to our pollution Prevention Guidelines,

Water Efficiency

We strongly recommend water efficiency measures be incorporated into this scheme. It would assist in conserving natural water resources and offer some contingency during times of water shortage. Please note the following condition has been supported by the Planning Inspectorate (North Dorset District Council Public Inquiry, APP/N1215/1191202 & APP/N1215/1191206, decisions dated 12 February 2007).

CONDITION

No development approved by this permission shall commence until a scheme for water efficiency has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the agreed details.

REASON

In the interests of sustainable development and prudent use of natural resources.

INFORMATIVE

The development should include water efficient appliances, fittings and systems in order to contribute to reduced water demand in the area. These should include, as a minimum, dual-flush toilets, water butts, spray taps, low flow showers (no power showers) and white goods (where installed) with the maximum water efficiency rating. Greywater recycling and rainwater harvesting should be considered.

The submitted scheme should consist of a detailed list and description (including capacities, water consumption rates etc. where applicable) of water saving measures to be employed within the development. Applicants should visit the environment Agency website. A scheme of water efficiency should be submitted in accordance with the information supplied on the website. The following may also be helpful- <http://www.savewatersavemoney.co.uk/>.

Sustainable Construction

We strongly recommend that the proposed development includes sustainable design and construction measures. In a sustainable building minimal natural resources and renewables are used during construction and the efficient use of energy is achieved during subsequent use. This reduces greenhouse gas emissions and helps to limit and adapt to climate change. Running costs of the building can also be significantly reduced.

In order to maintain our records please could you send us a copy of the decision notice issued for this application.

English Nature – Provided that the conditions recommended by the Environment Agency are applied to the planning permission should it be granted we have no further comments to make to our previous responses to planning application no S/2007/1865. **1. Under Regulation 48(3) of the Habitats Regulations 1994⁵** and based on the information

provided, Natural England is of the opinion that, the proposals, either alone, or in combination with other plans or projects, would not be likely to have a significant affect on the important interest features of the **River Avon Special Area of Conservation (SAC)**, or any of the features of special scientific interest of the **River Avon System Site of Special Scientific Interest (SSSI)**.

NB. I note that the potential impact of the development on water resources and water quality (both in terms of surface and foul water) on the integrity of the River Avon SAC and River Avon System SSSI is not considered directly in relation to the Habitat Regulations by the EIA (section 4.4.114-4.4.118). These impacts are however addressed adequately under Surface Water Drainage (section 4.8) and I am satisfied that there is not likely to be a significant affect.

If the application is amended, Natural England should be re-consulted for a further 21 days in accordance with *Circular 08/2005*.

Wiltshire Fire and Rescue Service – Having studied the proposals, the following comment relating to necessary and appropriate fire safety measures, is forwarded to you for consideration and inclusion within the proposed development.

Fire Appliance/Firefighting Access

Consideration is to be given to ensure that access to the site for the purpose of firefighting, is adequate for the size of the development and the nature of the proposed use.

Reference should be sought from guidance given in Building Regulation Approved Document B.B5- Access and facilities for the Fire Service.

Water supplies for firefighting

Adequate consultation is to be undertaken between the Fire Authority and the developer to ensure, that the site is provided with adequate water supplies for use by the fire service in the event of an outbreak of fire. Such arrangements may include a water supply infrastructure, suitable siting of hydrants and/or access to appropriate open water. Consideration should be given to the National Guidance Document on the Provision of Water for firefighting and specific advice for the Fire Authority on location of fire hydrants.

Sprinkler protection to Commercial premises

The nature of the proposal gives reason for the Wiltshire Fire & Rescue Service to strongly advise the consideration of appropriate sprinkler system protection for these premises. The advantages of automatic sprinkler systems are listed below.

Test Valley Borough Council

I can confirm we have no comments to make.

REPRESENTATIONS

Advertisement Yes Expired 24/01/08
Site Notice displayed Yes Expired 24/01/08
Departure Yes
Neighbour notification Yes Expired 16/01/08
Third Party responses Yes

Amesbury Community Partnership –

Within the community there is a great concern as to which of the two major supermarkets will be chosen and the feedback we are getting is positively in favour of one in particular.

Applicant reference S/2007/2226 which has no outlets in the local area has already indicated to both business and resident associations that it is willing to work in partnership with them for the benefit of the community as a whole. This was shown as early as last June when it sponsored the Amesbury Carnival queen float. It has also stated that it has no intension to

open sub-units within its store. It has a proven record of continuing its involvement with the communities long after start up.

Applicant reference S/2007/1865 already has three large outlets in the local area, so why is another one needed? It has not shown any interest in the approaches of local business and resident associations and has clearly stated that it will have sub-units within its store. These would jeopardise those businesses within Amesbury town centre of a similar nature. A town centre that after a number of years languishing in the doldrums, has in recent months been re-vitalised by the opening of no less than six new businesses and is now starting to thrive.

The ACP board recognises that the option for another supermarket is not within the current area plan but since that was published Amesbury has grown and in growing the needs of the community has changed and we must accept those needs and adapt plans accordingly. The town is now in a situation where it needs a second supermarket and the right one will help our town grow and prosper. Another supermarket for Amesbury would have little or no effect on retail trade generally within Salisbury as it has a good selection of shops not available within the town.

There is considerable concern about the volume of traffic between Amesbury and Salisbury, where a large number of people from Amesbury travel to shop for food due to lack of choice within the town. If another supermarket is not allowed this will continue to grow with all of the environmental consequences that go with it, whereas, if one is allowed, it would be a means to reduce carbon emissions and therefore improve the environment for all.

The consequences of not allowing either would not be good for Amesbury. Any community confidence that the District Council does care about our town would evaporate and there is already high feeling within the community that the SDC is only concerned with Salisbury and that Amesbury come's a poor second, yet we are the second largest town in South Wiltshire and contribute greatly to the economy of the area.

I would remind members of the SDC that the Amesbury Market Town Partnership Community Strategic Plan, published in March 2007, was agreed and adopted by them. In this document the people of Amesbury spoke out on their hope and aspirations for the future and the one point that came up time after time was the overwhelming need of another supermarket in addition to our existing one, which it was felt has had a monopoly for far too long. I would urge you and all members of the District Council to listen very carefully to the voices of both the public and traders of Amesbury on this matter. Traders are showing their preference visually by placing posters in the shop windows.

Great care must be taken in the choice of a successful applicant and it is felt that the one that offers the most benefit to the whole community and has the least social and physical impact on the existing community should be your preferred option and we trust that all avenues in this direction will be explored during the planning process. Think Amesbury not Salisbury as we are not a threat to your city but a partner making South Wiltshire a place where people want to come to visit and stay, not just pass through.

Salisbury and District Chamber of Commerce and Industry

Strenuously object to the application on the following grounds:

It is proposed on valuable employment land which is in short supply in the district of Salisbury.

The specific application for certain features of the store will have significant negative impact upon the trade and the ability to trade within the Town of Amesbury,. This is contrary to the understanding that Amesbury is attempting to re-invigorate it's town centre, making the process that much harder if at all possible.

The dominance of one Supermarket in the District of Salisbury is detrimental to the quality of life enjoyed by businesses and residents, thus competition must be encouraged.

The Stonehenge Chamber of Commerce

Consider that Amesbury needs much better retail shopping, but a supermarket such as Tesco would damage the town centre.

With Tesco on London road and already a Focus DIY and possibly a Lidl, it seems a retail park is emerging here which it is totally unsuitable for this volume of traffic.

The chamber believe that Tesco would harm the town centre, by having sub units within the store such as a pharmacy, post office, optician and dry cleaning. Tesco has demonstrated across the country their lack of concern for town centres. Tesco already dominate the area as a recent government report confirms, Salisbury is one of sixty towns dominated by one provider – Tesco, with a 58% market share. Tesco have furthered that dominance with their store in Tidworth. London Road is mainly residential and should be developed for housing.

The proposed site for a Tesco store would encourage HGV's to use London Road to and from the town centre. Access to the Tesco site would be very poor and the proposed roundabout would not work, vehicles emerging from Holders Road will not be able to see vehicles exiting the proposed roundabout, it is dangerous enough now!

Also HGV's servicing the Tesco supermarket will be turning in and out very close to the proposed roundabout which will be very busy. The proposal is for all HGV's to u-turn on the proposed roundabout, with say ten lorries per day having to do this would be very dangerous, therefore HGV visibility when leaving the Tesco site would be poor and thus dangerous.

The proposed roundabout would be very congested; on the eastbound arm for instance, vehicles will not have a clear view of the central island.

Tesco's proposals for buses is also dangerous, as buses stopping in the lay-by going to Amesbury will obstruct visibility of vehicles emerging from Holders Road. The bus lay-bys are too close to the roundabout so the bus drivers will find it difficult pulling out.

Our concerns are also for the residents, although sound barriers are proposed, the noise coming from metal cages being loaded and unloaded on lorries will travel, especially at night time. We must also think of the increased CO2 emissions in a residential area. Also we cannot see that having a supermarket next to a recycling centre is very appealing or healthy.

Letters in support covering the following issues the main points of which are –

- 1) Regularly shop every week in Amesbury because of work and do not have time to trek into Salisbury and like to support shops in the town centre. Have been bitterly disappointed with the new co-op store as I am sure many other shoppers are. It does not have the range of products we were expecting and in some areas has less choice. It also appears to be more expensive to shop there. From a shoppers point of

view it is not easy to see what is in the upright freezers and the air conditioning is too cold.

- 2) It is about time this derelict site is redeveloped and it would give the Co-op some competition they have been complacent with what the shopper is looking for in a store because they have had the monopoly too long. I would wholeheartedly support the scheme to build a new Tesco store, it is what the shoppers in Amesbury and the surrounding villages need, some choice in where they shop locally.
- 3) Aware that there are various arguments that this store will take away business from Amesbury town centre and in particular the existing Co-op considers this to be untrue. Have found that it is not possible to do a full weekly shop in the Co-op supermarket. The Tesco store would provide much needed competition for the Co-op and would provide a supermarket to the new residential estates. Tesco would provide much needed employment in Amesbury.
- 4) The proposed roundabout at the front of the store would act as a device for slowing the boy racers who race up and down London road at present.
- 5) This is just the thing for Amesbury fed up with the CO-Op this would be greener by cutting down the journeys to Salisbury, cant come quick enough.
- 6) The Co op has been the sole source for food supplies to the local residents and has been expensive with limited supplies. The lack of competition has allowed them to keep the prices sky high. Elderly and young families and one parent families have had to shop there as they've had no choice. The council has allowed this to continue for the last 30 years plus. By doing this they have successfully turned the village into a ghost town. If the villages are to be changed back from ghost towns let the locals have the facilities, shops they'll use rather than what you want us to use.
- 7) Proposed site is currently an eyesore and the proposal would tidy it up. Considers that the government has always taken the stance that no one should have a monopoly and this is what has existed with the Co op in Amesbury and it is time for shoppers to have a change.
- 8) Welcome the introduction of a bus service to the store the improvements to bus and cycle facilities and the new puffin crossing on London road. Houses on London road used to back on to a railway station years ago and therefore would have suffered noise and disturbance at that time.

Letters objecting covering the following issues the main points of which are –

- 1) Crime prevention advice would suggest that solid screen walls or fences with trees or shrubs should not be erected as it will give any burglar cover into rear gardens. Therefore where this situation is proposed along the rear of gardens of properties fronting James's road this will provide cover for burglars wishing to enter properties on James road.
- 2) The siting of the store will substantially increase traffic volumes along London Road with vehicles making one off stops, regular shoppers parking and through traffic increasing. This will make turning into or out of Holders road even more difficult or hazardous. London road is already busy as those who know it, use it to avoid the A303 during busy periods to enter or pass through Amesbury. A traffic study carried out in late 2006 already shows a high rate of traffic in the area and a new supermarket will increase that significantly. Road noise levels will increase. Any development should provide speed deterrents along the main roads and acoustic barriers to properties.
- 3) Tesco advise that the store will open between 8am and 10pm from Monday to Saturday with Sunday opening hours, however they could not confirm that in future

the store would not be turned into a 24hr store. The large car park at the front of the store which would back onto houses in James Road would not be secured and this would make it a target for local youths to turn it into a race track which would afford easy access onto the A303 which would make it difficult for the local police force to manage. This may cause hazardous egress into and out of the car park for those travelling down London road at night.

- 4) As the car park will back onto properties in James Road there will be increased noise caused by vehicle traffic from car doors closing, vehicles revving and general pedestrian noise for seven days a week, 364 days a year. There will also be noise levels from delivery lorries that might deliver at night and would therefore ask for there to be controls between 11.00pm and 6.00am in the morning.
- 5) The quality of the air will decrease due to vehicle pollution. Since purchasing the property twenty years ago the site to the rear of the property has always been used for commercial business. This part of Amesbury does not have sufficient commercial enterprises and we feel that the site would be better developed into small commercial sites rather than retail or residential. A new retail outlet is required within Amesbury but would better serve the community if it was on the outskirts and away from residential properties.
- 6) Concern is expressed at the proposal to build a path along the rear of properties fronting James's road as this could provide an area for youths for smoking, drinking and vandalism. The path should be properly policed.
- 7) Concern is expressed about the robustness of the retail assessment prepared by GL Hearn in particular it is considered the statement in paragraph 7.19 of the G L Hearn Retail assessment to be incorrect as the Archers Gate development S106 does not preclude the development of a supermarket.
- 8) The developers of Archers gate are actively engaged in discussions about developing a supermarket at Archers Gate, the reserved matters for which will be submitted shortly.
- 9) The GL Hearne retail statement fails to consider the impacts of the proposed development upon the vitality and viability of the permitted Archers Gate local centre and the threat posed to its vitality and viability by the development of a large out of town foodstore on London Road must be carefully assessed and considered prior to the determination of the application.
- 10) Considers that the inspector in the local plan concluded that the proposed foodstore in the town centre was large enough to meet the needs of residents until 2011 and therefore recommended the foodstore at Archers Gate to be sized to meet local needs only. In reaching these conclusions full account was taken of the extent of proposed new housing and employment facilities in the town which are being delivered. Given the completion of the town centre store and the absence of any substantive windfall sites there has not it is considered been any material change in circumstances that would justify the need for a large retail facility.
- 11) Developers of Archers Gate are putting forward as part of the LDF a significant extension to Archers Gate between 2011 to 2026 and they have also requested that Salisbury District Council give consideration for the development of an appropriately sized out of town foodstore which would be developed as an integral part of any future south easterly expansion of the town. This would be located next to existing and potential future residential areas and bus routes with access to cycleways, footpaths and the Amesbury link road. It is considered favourable determination of planning application S/07/1865 would therefore be premature pending the LDF's adoption.

- 12) People will travel from Porton, Boscombe, Winterbournes and villages of the Woodford Valley causing more traffic on what will be the main link road (link road through Archers Gate).
- 13) Proposal runs counter to encouraging the principles of town centre growth and would be at odds with the viability of Amesbury Town centre. Proposal would devastate the town centre.
- 14) Light pollution from floodlights may effect houses in James road.
- 15) Vehicles will produce a substantial amount of CO2 and CO within close proximity of housing.
- 16) Building works may cause subsidence to properties in James Road.
- 17) Slow worms have been found at the end of gardens in James Road and therefore survey submitted is incorrect.
- 18) Developer is to pull down affordable housing which is in short supply in the area.
- 19) Consider the proposal is better placed within the Solstice Park development which is not being suitably populated.
- 20) Tesco have a history of growing small stores, building stores larger than allowed, adding new services and extending opening hours.
- 21) Note that Tesco is to use Gregory buildings opposite for storage. This will also cause an increase in traffic creating a further noise and pollution issue for residents.
- 22) Would wish to make sure that both customer and delivery traffic approaches the store from the Folly Bottom or Porton Road roundabout rather than from the Countess Road end.
- 23) Concern is expressed that in the future the occupiers will open a pharmacy, drycleaners, opticians with little or no regard for existing small businesses trading locally. It is important that local people enjoy choice from a number of retailers and service providers to create a vibrant sustainable and economic town centre.
- 24) There are already two Tesco stores in Salisbury, two in Andover and a brand new store in Tidworth. The Southampton road store in Salisbury causes regular chaos and congestion on the ring road and if permitted to build in Amesbury would quite likely do the same for the residents of the town. Considers Asda would provide more competition.
- 25) Concern is expressed over the wind turbine which will obscure views and cause potential disturbance.
- 26) Proposed store will devalue properties in London Road.
- 27) Is Tesco serious about building a store or do they intend to land bank it in order to prevent further competition?
- 28) Objection on behalf of Somerfield Stores in that the proposals are not in accordance with any site specific allocation in the adopted local plan and are not consistent with the Councils Retail and Leisure Needs Assessment by GVA Grimley.
- 29) The proposal does not demonstrate either qualitative or quantitative need, in particular the forecast increase of Amesbury's market share is unreasonable and is considered unlikely to occur; the proposed increase in market share is considered to be self fulfilling and there is only qualitative need due to the forecast claw back of expenditure.
- 30) The sequential test has not been appropriately applied and the disaggregation of convenience and comparison elements of the proposed store should have been considered separately: in addition the assessment should have considered Tidworth since this is within the GLH catchment area and is at the same level in the shopping hierarchy as Amesbury.
- 31) The level of impact forecast by GL Hearne will result in a material harm to the vitality and viability of Amesbury in any event we consider that the improvement in

- Amesbury's marketshare is unlikely to reach the levels forecast so the levels of impact being shown are likely to be an underestimate.
- 32) Within the Annexe submitted by Roger Tym and Partners on behalf of Somerfield careful consideration is given to retail planning arguments in support of the planning application. The evidence provided, suggests that the planning application is contrary to national and development plan policy. Urge the council to refuse the planning application on these grounds.
 - 33) Consider the HGV entrance onto London road will create a traffic hazard. Proposal for up to ten HGV's per day to perform U turns on the new roundabout on London road would be dangerous.
 - 34) Observations in the past at the Salisbury store have shown a markedly high number of plastic carrier bags being blown around in adjacent fields. Concern is expressed that this would happen in Amesbury. This would compound the already massive widespread discharge of litter generated from the KFC outlet at Solstice Park by anti social customers.
 - 35) The proposal would be in close proximity of Stonehenge school. Holders road may become a rat run from Boscombe road to London road. The increased traffic up and down this road would be a danger to children leaving Stonehenge school. Increased traffic would create a danger to pedestrians using Holders road
 - 36) Owners of the Minton Distribution park consider the proposal is of such a scale as to impact substantially on traffic management in the immediate vicinity. The close proximity of the proposed access to that on London road could impact on vehicles entering both sites so causing congestion.

Town Council response Yes, No objection

Further to our response of no objection we would like to make the following comments:

Other than the road improvements outlined there is no indication of any other planning gain. We have three requests/proposals regarding opportunities that should not be missed.

Access to the recycling centre (to the rear of the site) to encourage re-cycling.
Improved cycleways along London Road between the Solstice Park network- past the application site to Kitchener Road to connect with the town centre.

A suggestion that the site and or shop should give indication to the history of the site (as a once busy railway station and goods yard) perhaps an artefact or interpretation board at the entrance with information supplied by the Amesbury Society would be appropriate.

Also, No objection – a new retail outlet is long overdue and urgently required in the town.

MAIN ISSUES

1. Principle of development, Impact on the vitality and viability of the city centre
2. Loss of existing employment uses
3. Design issues
4. Noise and Disturbance
5. Noise/air pollution/contaminated land
6. Light Pollution
7. Highways and access issues
8. Sustainable measures
9. Archaeology

- 10. Ecology
- 11 Appropriate assessment
- 12 Crime prevention
- 13 Flooding
- 14 Loss of Housing

POLICY CONTEXT

Central government guidance

PPS1-Sustainable development, PPS1 Planning & Climate Change Supplement to PPS1 PPG4 - Industrial and commercial development, PPS6 – Planning for Town Centres, PPS9 Biodiversity and Geological Conservation, PPG13 Transport, PPG16 Archaeology and planning PPG24 planning and Noise PPS25 Development and Flood Risk.

Manual For Streets

Relevant Policies contained within the Wiltshire Structure Plan 2016 ‘saved policies’.

- DP1 (Sustainable development)
- DP2 (Infrastructure)
- DP5 & DP6 (Shopping development)
- T5 & T6 (Sustainable transport modes/alternatives to private car use)

Salisbury District Council adopted Design Guidance – Creating Places.

Policies contained within the Salisbury District Local Plan (Saved policies). Including policies G1- General principles, G2- General policy, G4 – Flooding, G5 –Water Services, G9 – Developer contributions, D1- Extensive development, E8A- Employment, E16- existing employment use, CN21- Archaeology, CN22 – Archaeology, CN23 - Archaeology, C14 – nature conservation, C10-SSSI, C12- protected species, TR12- transport measures, TR14 Cycle Parking,

PLANNING CONSIDERATIONS

This application is an EIA development for which an environmental Impact Assessment has been submitted.

The environmental impact assessment covers the following topics –

- Traffic and Transport*
- Landscape and Visual Impact*
- Socio- economic effects*
- Nature conservation*
- Noise and vibration*
- Air quality*
- Ground Conditions and contamination*
- Surface Water Drainage*

Principle, Impact on the vitality and viability of Amesbury Town Centre

Policy S4 of the Salisbury District local plan included impact criteria to safeguard the vitality and viability of town centres, introducing the concept of need and sequential approach. However, the Secretary of State for Communities and Local Government in exercise of the power conferred by paragraph 1(3) of schedule 8 to the Planning and Compulsory purchase Act 2004 has directed that paragraph 1(2)(a) of schedule 8 applies to policy S4 which does not become a saved policy and therefore does not continue to have statutory effect as a development plan policy.

The relevant 'shopping' policy in the Development Plan for the principle of new retail development in this location is therefore policies DP5 and DP6 of the Wiltshire Structure Plan 2016. These policies support growth and development in existing centres in response to 'widespread concern about the impact of out-of- centre superstores' (para 4.50) and are in accordance with Central Government Policy objectives, which place an emphasis on the need to enhance the vitality and viability of existing centres, now encompassed in PPS6.

In order to deliver the Government's objective of promoting vital and viable town centres, development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them.

In selecting sites for development, local planning authorities should:

- a) assess the need for development, (paragraphs 2.32-2.40);
- b) identify the appropriate scale of development (paragraphs 2.41-2.43);
- c) apply the sequential approach to site selection (paragraphs 2.44-2.47);
- d) assess the impact of development on existing centres (paragraph 2.48); and
- e) ensure that locations are accessible and well served by a choice of means of transport (paragraphs 2.49-2.50).

Guidance in PPG13 is also consistent with the key objectives of PPS6. It endorses the broad principles of the sequential approach and the need to ensure that wherever possible new shopping is promoted in existing centres, which are more likely to offer a choice of access, particularly for those without a car.

Wiltshire County Councils planning department have commented as above.

Advice from the councils own forward planning department is as follows –

Need

The RLNS originally identified turnover in Amesbury of 18.2m rising to 19.6m in 2011, however GVA (Grimley) have accepted that these figures are an overestimate, and have revised the figures to 14.4m and 15.6m respectively. (Appendix 6 table 8 refers)

The deductions in the main report for committed floorspace also include an arithmetical error, which overstates the potential turnover of commitments. This generates a notional surplus of £7.7m, which if the old co op were wholly occupied for convenience retailing would largely accommodate the identified capacity. The turnover of the proposed Tesco is £27.5 million and therefore is way in excess of the need in Amesbury.

Sequential test

Para 2.44 PPS 6 states that

“first, locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become, available within the development plan document

period, taking account of an appropriate scale of development in relation to the role and function of the centre;

The applicants have assumed in their statement that the old co op store would not be reoccupied by a food retailer, but evidence has been received with the planning application for the Lidl application 2007/1616 refers) from Aldi stating that they have agreed terms with the co op to lease the whole of the old unit for convenience shopping.

A planning application has been submitted but not yet registered by Frobisher retail for the demolition and redevelopment of the old co op store for a larger food store. Although not registered this is a material consideration that needs to be taken into account when assessing this application as it can be argued that this demonstrates that there is an alternative site within the town centre that is deliverable and the letter from the co op demonstrates that the site is or will be available for this proposed scale of store.

As part of the preferred options that are currently out for public consultation and the preferred option in the report is for the promotion of a new supermarket for Amesbury in the town centre. This is in direct response to the issues and options responses, which were as follows:

Question	Agree / strongly agree	Neither agree or disagree	Disagree / strongly disagree
An out of town supermarket is needed in Amesbury	32%	40%	28%
An out of town supermarket would add to the decline of Amesbury town centre	46%	38%	16%
We should try and find a site for a new supermarket in Amesbury town centre	40%	42%	18%

Therefore the LDF process may allocate a site for a supermarket in Amesbury town centre, commensurate with its role.

Para 3.19 of PPS 6 states

*Where it is argued that otherwise sequentially-preferable sites are not appropriate for the particular development proposed, applicants should provide clear evidence to demonstrate why such sites are not practicable alternatives in terms of: Availability: the sites are unavailable now and are unlikely to become available for development within a reasonable period of time (determined on the merits of a particular case). **Where such sites become available unexpectedly after receipt of the application the local planning authority should take this into account in their assessment of the application;***

Impact

As shown in the attached Grimley Report, the impact of the proposed Tesco if assessed using the data put forward by G L Hearn (consultants on behalf of Tesco) the impact of the proposed Tesco store on Amesbury’s convenience goods sector would be about 33%. This compares with the Asda impact of 48%. Grimley conclude that using their figures the impact for each is approximately 40% or more.

Councillors also raised at the Northern Area Committee in December about the possibility of Amesbury increasing its market share. In order to make it worth the while of a retailer to increase the market share, they would have to propose a large store, like the Tesco proposal. The knock on effect of increasing the market share would be the impact that this new store would have on the existing town centre.

Para 3.22 of PPS 6 is also of relevance. It states that “in particular, local planning authorities should consider the impact of the development on the centre or centres likely to be affected, taking account of:

- **the likely effect on future public or private sector investment** needed to safeguard the vitality and viability of the centre or centres;
- **the likely impact of the proposed development on trade/turnover and on the vitality and viability** of existing centres within the catchment area of the proposed development
- **changes to the range of services** provided by centres that could be affected;
- **likely impact on the number of vacant properties** in the primary shopping area;
- **potential changes to the quality, attractiveness, physical condition and character of the centre** or centres and to its role in the economic and social life of the community; and
- **the implications of proposed leisure and entertainment uses** for the evening and nighttime economy of the centre (see also paragraph 2.24).”

Conclusions

This application will have a significant impact on the vitality and viability of Amesbury, and if consented could undermine investment in the centre, and there is a need to protect existing employment allocations, therefore I raise a POLICY OBJECTION to the proposal.

In accordance with Section 54A of the Town and County Planning Act 1990 and Section 38 (6) of the Planning and Compulsory Purchase Act 2004, the application should be refused.

Need

Please see the attached report, ‘Review of proposed foodstores in Amesbury’, by GVA Grimley (appendix 1) for the full assessment of this proposal, on need and impact.

The RLNS originally identified turnover in Amesbury of 18.2m rising to 19.6 m in 2011, however GVA have accepted that these figures are an overestimate, and have revised the figures to 14.4m and 15.6m respectively. (Appendix 6 table 8 refers)

The deductions in the main report for committed floorspace also include an arithmetical error, which overstates the potential turnover of commitments. This generates a notional surplus of £7.7m, which if the old co-op were wholly occupied for convenience retailing, would largely accommodate the identified capacity. The turnover of the proposed Asda is £27.5 million and therefore is way in excess.

Scale

Although it has been demonstrated that the proposed turnover of the store is in excess of requirements, the guidance in PPS6 indicates that local planning authorities should also consider whether there are qualitative considerations that might provide additional justification for the development.

In order to support the scale of additional floorspace, both (ASDA and Tesco) proposals rely on a significant increase in market share. Clearly there is no reason why Amesbury cannot or should not seek to increase its market share – the key issue is the impact arising from a larger store outside the town centre on the vitality and viability of the town centre. GLH on behalf of Tesco rely on a significant increase in market share in order to generate capacity. They have carried out their own independent household interview survey and undertaken a more detailed assessment of current shopping patterns. This suggests that following the opening of the replacement Co-op store Amesbury's market share has apparently fallen (although the difference identified could readily be accounted for by the margins of error inherent in such surveys). GLH highlight they have employed a larger sample size than the survey which underpins the RNLS and in our view any difference between the market shares is more likely to be accounted for by this factor than any actual decline in Amesbury following the opening of the replacement store.

Given the level of main shopping that is taking place away from Amesbury Town Centre, it is evident that in the absence of any alternative option, a large modern foodstore would provide additional choice and competition to the Co-op in Amesbury Town Centre and by reducing the need to travel for main food shopping, would be likely to reduce overall travel demand and achieve a more sustainable shopping pattern. Moreover, letters of representation from nearby residents have welcomed such a store within walking distance. In this respect the potential benefits of the proposals are not disputed. However, these benefits have to be considered against any alternative options and the impact of the proposals on Amesbury Town Centre.

The issue of scale even if it does claw back trade to the Amesbury area and the Grimley report demonstrates that this will be at the expense of , rather than benefit to the town centre.

Sequential test

The applicants have assumed in their statement that the old co-op store would not be reoccupied by a food retailer, but a planning application has been submitted but not yet registered by Frobisher retail for the demolition and redevelopment of the old co-op store for a larger food store.

Although not registered this is a material consideration that needs to be taken into account when assessing this application as it can be argued that this demonstrates that there is an alternative site within the town centre. The most recent letter from the coop states that if Lidl is granted (which it has been in principle), Aldi are likely to withdraw their offer to reoccupy the former coop and the coop will not support the Frobisher scheme as the cumulative impact of Lidl and a new town centre supermarket would be so high as to damage its interests.

However, it is considered that an out of town supermarket would also impact upon the coop, if it diverted 40% of trade away form the town centre and furthermore would impact upon the town centre as a whole.

In addition the existing coop store has an A1 use and it is unlikely that the LPA would view any change of use away from A1 favourably owing to the prominent location of this building within the prime-shopping frontage of Salisbury Street, as such a change

would be likely to be contrary to saved policy S1.
Therefore it is considered that this letter cannot therefore at present, be taken as evidence that a town centre site is not deliverable.

PPS 6 advises that in applying the sequential approach, developers and operators should be able to demonstrate that they have been flexible about their proposed business model in terms of its scale, format, car parking provision and scope for disaggregation. Local Authorities should be realistic in considering whether sites are suitable, viable, and available, and take into account genuine difficulties, which the Applicant can demonstrate are likely to occur in operating its business model from the sequentially preferable site.

Confirmation was received from the co-op that they were willing to let the whole store to a convenience food retailer, although the situation may have changed since the resolution to grant Lidl.

It is still clear that there is a sequentially preferable site in the town centre, which will mop up the identified capacity in the RLNS and meets the town centre first principles set out in PPS6.

It is therefore considered that this site has not been sufficiently explored by the applicants, nor has the possibility of a town centre site through disaggregation- for example of food/non food.

Therefore even if it is accepted that there is a need for a food superstore in Amesbury, of the size proposed, it has not been demonstrated that there is no sequentially preferable site within or on the edge of the centre, bearing in mind the advice in PPS6, it is evident that the applicant has not thoroughly examined the potential for redevelopment of the former Co-op store. The potential future of the former Co-op store has a bearing on the need and impact issues raised by the food superstore proposals,

Impact

The Grimley report attached runs through the arguments in detail as regards the impact that the Tesco store is likely to have on the town centre. In particular G L Hearne have estimated the convenience goods turnover of the proposed Tesco to be some £27.5m of which £5m of the stores turnover would be diverted from existing retailers in Amesbury. They therefore conclude the impact on the town centre to be in the region of 33% on the towns convenience sector. G L Hearne consider that even with this impact the Co op would still be expected to trade above its companies average level.

The Grimley report suggests that the impact from either Asda or Tesco would be in the region of 40% and the impact on the non food sector to be less significant. At these levels Grimley state that there would be a concern in respect of the overall vitality and viability of the town centre. However most of the direct impact would be on the Co –op and this would be unlikely to close even at the levels predicted.

Importantly though Grimley conclude that there would be a wider impact on other convenience retailers partly as a result of the indirect effect of lost linked trips arising from the impact on the Co-op

Conclusion

It can be seen from the above responses from both the councils own forward planning department, Wiltshire County Council and the councils retained retail consultants

(GVA Grimley) (see attached report) that the proposal is likely to have a significant impact on the vitality and viability of Amesbury Town centre and as such could undermine investment in the town centre.

Members should note the letter received from Co Op (see appendix) stating that they are unlikely to allow their former site in the town centre to be used for retail use for any other retailer if planning permission is granted for the Lidl foodstore on the Minton distribution park (which it has been). This letter is a material consideration. However it should be borne in mind that the site could be compulsorily purchased should members be minded to do so. As such it is considered a sequentially preferable site is available in the town centre.

In summary therefore the proposal represents a development that is likely to have a significant impact on the vitality and viability of the town centre as evidenced in the Grimley report and for which there is a sequentially more preferable available site

Loss of existing employment uses

This application envisages the building on existing employment land. The forward planning department of this council has commented as follows -

The employment land review (ELR) forecasts the land required to 2026 and has identified that 25-30 ha of new employment land will be required before that date. The recently published panel report into the RSS has recommended that this be increased to 37 hectares of employment land. This demonstrates that current employment land needs to be protected.

The ELR also identifies Amesbury as being strategically important for the whole of Salisbury's economy and not just the local community area that it is located in, and therefore given its strategic importance land should be retained for employment (B1,B2,B8) use. This is backed up by the RSS panel report which states that Amesbury will need to provide a continuing supporting role to Salisbury for the provision of employment land.

Evidence given to the EiP by SWERDA/DTZ in their employment land supply appraisal Addendum for the Salisbury SSCt identified that only 36ha of employment land was available compared with a demand of 37ha, therefore a shortfall of 1 ha. This assumed that the 18ha of Solstice Park would remain in employment generating use. Again given the supporting role of Amesbury, it is important that all existing employment land is protected, so that this shortfall is not exacerbated and results in the allocation of more Greenfield land elsewhere for employment use.

The relevant retained planning policy to this proposal is policy E16 which states that –

E16 – On land allocated or currently used for employment purposes, the construction, change of use or redevelopment of premises for other purposes will only be permitted where the proposed development is an acceptable alternative use that provides a similar number and range of job opportunities. The only exceptions to this are where the land or premises are no longer viable for an employment generating use and/or where redevelopment of a site for a non-employment use would bring improvements to the local environment or conservation benefits that would outweigh the loss of local jobs.

The applicants have stated that the new store will provide a new source of employment within Amesbury with the provision of between 200 and 220 full time equivalent jobs, with usual employee numbers between 317 and 340 full and part time.

Changing the use of the site to retail would in officers opinion conflict with policy E16. The range in terms of types of jobs available is likely to be significantly different to that which could otherwise be available if the site was left with its current use designation. The site is a large one which currently contains a range of buildings which could and have been until recently or still are providing a diverse range of job opportunities. Whilst numerically the number of jobs to be provided by the new store may well be greater than that which are provided on site at present the range of jobs being within a single retail store and primarily consisting of low paid and many part time jobs are not consistent with the policy.

The policy states that employment uses may be replaced where there are environmental improvements brought by the new development. Several third party representations consider that there would be environmental improvements brought by this proposal. It is officers opinion that this is not the case. Whilst the proposal in terms of its visual appearance is

considered to be acceptable by officers this is primarily due to the fact that much of the building will be 'hidden' by placing it at the rear of the site at a point where the land is lower and therefore the store will appear as less intrusive. The design of the store itself is not considered to be significantly better than that which it replaces and certainly does not bring the environmental benefits that would be required in order to outweigh the loss of the range and quality of jobs even considering the environmental measures proposed by the applicants as part of the proposal.

None the less notwithstanding this the application does propose a substantive number, of new jobs to the local economy, a number of jobs that would seem unlikely to exist even if the site were developed for alternative employment uses, therefore whilst the range and quality of jobs is likely to be lower than might otherwise exist if the site was developed for employment uses, the number of jobs created is likely to be at the high end of what could be expected at the site, this coupled with the fact that the existing uses on site have on the whole either moved or are intending to move to new premises, in part as a result of this new development and in part for other reasons, means that it is considered in this case that notwithstanding the comments of the forward planning department and the conflict with policy E16 there are significant job opportunities this use will provide which in officer's opinion outweigh the local plan policy. Members should note that a similar stance was taken to employment uses and policy E16 when assessing the nearby Focus DIY store.

Design Issues

The proposal in design terms needs to be assessed against the relevant retained policies of the local plan these include -

D1 Extensive Development

New development will be permitted where the proposals are compatible with or improve their surroundings in terms of the following criteria:

(i) the layout and form of existing and the proposed development, and where appropriate the historic pattern of the layout;

(ii) any features or open spaces, buildings and/or structures of character on or adjoining the site;

(iii) the scale and character of the existing townscape in terms of building heights, building line, plot size, density, elevational design and materials ;

(iv) the scale and use of spaces between buildings;

(v) views/vistas afforded from within, over and out of the site; and

(vi) any existing important landscape features and the nature and scope of new landscaping proposed within and around the edges of the site; and

(vii) the roofscape/skyline long or medium distance views.

And

D2 Infill Development

Proposals for street and infill development will be permitted where proposals respect or enhance the character of appearance of an area in terms of the following criteria:

(i) the building line, scale of the area, heights and massing of adjoining buildings and the characteristic building plot widths;

(ii) the architectural characteristics and the type, colour of the materials of adjoining buildings; and

(iii) the complexity and richness of materials, form and detailing of existing buildings where the character of the area is enhanced by such buildings and the new development

proposes to replicate such richness.

In addition members will be aware that the district council has adopted it's own SPG, Creating Places which is a design guide for the district. The SPG contains many policies relevant to this planning application but of particular note are –

Commercial and Industrial development, Part 17, Part 6, Sustainable Design and construction and Part 12, Designing Out crime.

Prior to submission the applicants took their proposal to the local authorities design forum it was then brought back to the design forum when the application was submitted.

On the latest occasion the design forum commented as follows –

The Forum welcomes the general design and appearance of the store noting that it is now a simple, unapologetically modern and uncluttered building, fit for its intended purpose. It represents a significant improvement over the initial proposal. Our only slight concern was in regard to the modular aluminium cladding that would cover most of the store's elevations. We have no objection to the use of such cladding, but having noted the close proximity of many of the properties bordering the site and in keeping with our general view that 'less is more' it was thought that it would be better if the aluminium cladding had a silver-grey finish rather than brilliant white.

Given the proximity of neighbouring dwellings to the site it is essential that the site section drawings (which were included in the presentation) are submitted to supplement the other drawings already submitted for the application.

We welcome the integration of renewable energy technology in addition to energy conservation measures which we hope will generate significant reductions in on site CO2 emissions and help to raise public awareness. We are particularly glad that effective but low-profile technology, such as the tri-generation micro-CHP unit is proposed to be installed as this will, of itself, reduce much otherwise anticipated on- site CO2 emissions.

In response to the forums comments the applicants have amended the colouring of the cladding on the outside of the building from White to grey and included the sectional drawings as part of the planning application.

The forum having considered the scheme felt it was appropriate to the site. The applicants have chosen a contemporary store design which officers would suggest is appropriate to this mixed use location. The store itself will be set at the rear of the site with car parking to the front. Whilst officers have raised concerns about this previously with the applicant due to having the car parking as the main view of the site down London road rather than the building fronting the site, the applicants have stated that they have designed it in this way in order that the building can be located at the rear of the site where the land levels are lower and the building will therefore appear less prominent.

In view of the design forums comments on the application and the less prominent location of the store towards the rear of the site it is considered that the proposal in design terms is considered acceptable.

Noise and Disturbance

Clearly a supermarket dependant on factors such as it's design, Size, layout and operation has the potential to have an adverse effect on it's neighbours. Planning policy as contained within the retained policies of the local plan covers this issue under policy G2 (Vi) where it states that - *New development will be considered against the following criteria: (vi) avoidance of unduly disturbing, interfering conflicting with or overlooking adjoining dwellings or uses to the detriment of existing occupiers;*

The chosen site for the supermarket lies in an area of mixed uses, to the North and East are other commercial/industrial uses and it is considered in terms of noise and disturbance that the supermarket is unlikely to have a significant effect on these types of uses. However to the west along one whole side of this long site lies a long row of houses and the supermarket has the potential to have an impact on these properties.

James Road and Annetts Close are both accessed off Holders Road which joins London Road at a point close to the front of the site. Houses in this road back on to the site and have rear gardens abutting parts of the new development. In places there is a significant drop in land levels between the back gardens of these properties and the adjoining supermarket site. Depending on where each residential property is situated will depend on the type of possible noise or disturbance that could be encountered by neighbours. The types of potential disturbance include

- Noise from cars and vehicles entering and exiting the site
- Noise from trolleys and their usage
- Noise from delivery vehicles both entering the site and in the delivery bays (including reversing beepers)
- General noise from people including talking and shouting
- Noise from plant and machinery associated with the site
- Noise from the loading bay.

All of these noises are likely to be associated with the site to a greater or lesser extent at some point and several neighbours have raised potential concerns regarding these. The degree to which they will effect neighbours and that they are acceptable is to a large extent dependant on their intensity, the time that they take place and the mitigation measures that are put in place.

In considering the effects that any noise and disturbance may have on neighbouring properties members must have regard to both the existing use of the site and the potential uses that could be made of the site without the further grant of planning permission. It is considered that the majority of the site is currently in B8 (wholesale, warehouse, distribution centre etc) use or B1 use (light industry). Within these classes office use can also be permitted without the further specific grant of planning permission.

The applicants proposal includes as a mitigation measure along the boundary a 2m high acoustic fence to help prevent sound travelling into the backs of properties in James Road and Annetts Close it is also proposed to provide planting between the site and the boundary of properties which will help more screen the proposal than reduce sound emission although planting is known to help baffle sound transmission to a limited extent.

The applicants intend to open the store between the hours of 7am to 11pm Mondays to Saturdays and 10.00am to 5pm on Sundays. The applicants have suggested that they will require delivery vehicles to be able to enter the store between the hours of 6am and 11pm.

Particularly with regard to the late opening hours as proposed at the store there is the potential for there to be conflict between neighbouring residential properties and the application site.

The councils environmental health department have assessed the proposal and have stated the following –

That if members are minded to grant planning permission the following condition be imposed

“Before commencement of the development hereby permitted there shall be submitted to and approved by the local planning authority a scheme for the insulation against noise emissions from wind turbines, combined heating/power plant or any other similar plant or equipment. Such scheme as is approved shall be implemented to the satisfaction of the local planning Authority before any part of the development is brought into use opens for trading.”

The environmental health officer also recommends a condition restricting the noise level of the ventilation and refrigeration plant.

The environmental health officer also recommends that the acoustic barrier provision both between neighbours and the store and between the service road access and the store is conditioned.

The environmental health officer is still concerned (despite further work by the applicant) about the potential noise from the loading bay which is proposed at the rear of the site. He has suggested that were members minded to grant permission that again this be conditioned requiring a separate scheme of noise control for the loading bay area and that deliveries be limited between the hours of 7am and 10pm

Clearly this development has the potential to have effects on surrounding property for the reasons outlined above however given the mitigation measures proposed by the applicants, the comments made by the environmental health officer and positioning of the building on the site with its main wall facing neighbours (at a lower level) and the enclosed building part of the delivery bay facing neighbours meaning that noise emanating sources are situated some distance from neighbours, it is considered that noise issues can be successfully controlled where they exist.

Many supermarkets operate successfully in residential areas and it is usually down to the management of the store and the effective enforcement of conditions that ensures the store will operate in a manner that does not effect neighbours in view of this it is not considered that the application will have a significant effect on neighbouring amenity such to warrant refusal of planning permission.

Light Pollution

Policy G2 (VI) (see above) is also relevant to the potential for light pollution from this development. The proposed store opening hours are such that the store will need illumination both internally and externally in the car park and loading bay during non daylight hours. Clearly the amount of illumination can be controlled by condition as can the intensity of illumination and the hours of illumination. The environmental health officer has therefore stated that he is satisfied that the scheme could continue with the application of the following condition –

“There shall be no spillage of light into residential dwellings adjacent to the development hereby consented greater than 10 lux before 11pm and 2 lux after 11pm.

It is considered that the levels of lighting at the site can be sufficiently controlled with the use of appropriate conditions as recommended by the environmental health officer and given the proposed fencing, landscaping and site levels of the store that this issue can be controlled.

Highways and access issues

Members will note that although The Highways Agency was consulted in view of the potential impact on the A303 after initially objecting to the initial application the Highways Agency have withdrawn their objections to the scheme and submitted the view as above.

The application proposes 358 parking spaces for the new store and this is in line with the councils own retained maximum parking standards. This is acceptable to both the County Council and the Highways authority.

It is proposed as part of the development to make improvements to the London road/Porton Road roundabout.

- Proposed improvements are also to be made at the junction of London Road and Countess road.
- A new puffin crossing will be constructed on London Road and a new cycle/footway will be provided between the site and Solstice Park.
- It is proposed that improved bus stops and improved crossing facilities for pedestrians are provided at the site.
- A contribution of £250,000 will be provided by the developer to fund a new off-peak bus service for five years to link the site with surrounding residential and employment areas.
- A green travel plan will form part of the development proposals in order to promote sustainable means of access to the store for both customers and staff.

It can be seen from the above that various sustainable measures have been introduced by the applicant in order to ensure that the new store although located away from the town centre has limited impact on the surrounding road network and that travel options such as walking, cycling and using public transport are available to the public who are likely to use the store.

WCC have as can be seen above raised concerns with regard to the proposed improvements to the A345 junction with London road in particular the modelling that the applicants have used on this junction which the County highways consultants do not consider to be robust. This junction is clearly an important consideration in the overall strategic highway network surrounding the site. Given the concerns that Wiltshire County Council have regards to this particular issue and their recommendation that the application be refused on this basis. It is recommended refusal of the application on this basis.

Following the revised comments from WCC officers wish to revise the reasons for refusal in respect of the highways matters to reflect the concern regarding the impact on the overall highway network (including the London road/A345 junction and the roundabout junction (see below)

Officers have previously considered the positioning of the store at the front of the site as suggested by WCC and have concluded that given the bulk and design of the proposed store it is better placed at the rear of the site where the land is lower and the bulk of the store can be more easily hidden. Officers do not consider that the distance travelled by pedestrians or cyclists between the front and back of the site is significant enough to prevent or substantially edissuade pedestrian or cycle traffic from the store.

Sustainable measures

The councils own retained policies and new guidance as issued by central government in the form of a companion guide to PPS1 both place requirements on the local authority to consider the effect that the development will have on the environment and any environmental measures that the applicant may propose to offset it's carbon emissions.

With this in mind, the applicants have proposed a number of measures that could help to offset carbon emissions –

It is proposed to use a combined heat and power plant which uses waste heat from electricity production to provide heat for space and water heating. The scheme proposes a gas powered combined heat and water system. This system could potentially reduce the carbon emissions of the development by 11.24% of the total.

The application also proposes the installation of a 14M high wind turbine close to the boundary with the adjoining Minton Distribution Park. This has the potential to make a small reduction to CO2 emissions.

The third type of sustainable measure that the applicants are considering is the installation of photovoltaic panels on the roof of the building these generate electricity and will help reduce the overall Co2 footprint of the building.

These three potential measures will help Carbon emissions at the site. If members were minded to grant consent and considered that these measures were crucial to the reasons for granting consent they should be conditioned to ensure that they are carried out as part of the development.

It should be noted that concerns have been raised in relation to the proposed wind turbine and possible noise disturbance, however the design is such that noise disturbance from the wind turbine will be minimal or insignificant as such officers raise no objections to this aspect of the application.

Archaeology

This site was formerly part of the railway that ran through Amesbury and as such it appears likely the ground was substantially disturbed at that time from its construction. Since then the ground was infilled and the current buildings built on the site. Previous ground investigations were made as part of a previous planning application at the site and these showed that there was unlikely to be anything of any archaeological significance at the site. Given all this the County archaeologist has stated that they wish to make no comments on the scheme.

As the prospect of finding any significant archaeology appears to be low it is not considered appropriate to make any further requirements of the applicant in regard to this issue.

Ecology issues

The site has been shown to have protected species present at the site including slow worms and common lizard as such the applicants are proposing a translocation exercise to move the protected species if planning permission were granted. This is considered an appropriate way to ensure that these species remain protected and that they are not harmed or killed as a result of the redevelopment of the site. Natural England have raised no objections to the development.

Appropriate Assessment

An appropriate assessment is not required because Wessex Water can accommodate the likely foul water inputs and surface runoff within the sewerage network, and also provide the potential long-term demand for water within their abstraction licenses. The proposal is not, therefore, either alone or in combination with other plans or projects, likely to have a significant effect on the important interest features of the River Avon Special Area of Conservation (SAC), or any of the features of special scientific interest of the River Avon System Site of Special Scientific Interest (SSSI). This is a view supported by Natural England (see above).

Crime prevention

Issues surrounding crime prevention have been raised by neighbours to the development, specifically neighbours have queried the potential for the car park at the front of the site to be used for anti-social activities at hours outside of the main operation of the store. Officers have consulted the police architectural liaison officer as part of this application and she has commented as follows –

The only comments I have were made directly to the architects during a presentation of the scheme at a recent Design Forum. My concern was that security of the car parks should be considered and born in mind when security/safety measures were put in place.

Clearly the police architectural liaison officer's concerns are similar to that raised by residents and whilst there will be a security presence at the site at out of store opening hours. It may also be prudent if members were to be minded to grant planning permission for this development that a condition be added requiring lockable barriers to be installed and used at out of store hours in order to prevent anti social behaviour at the site.

Flooding

Planning Policy Statement 25 as published in 2006 requires in annexe D that developers consider the risk of flooding from their development if that development site exceeds 1 hectare. As this site does exceed one hectare the applicants have submitted a flood risk assessment. This assessment runs through and considers what the main risks from flooding to the development would be. It concludes that of all the types of flooding if there was any risk from flooding it would come from overland flow, that is to say that a redevelopment of this type needs to be assessed in terms of flooding from the existing drainage systems due to increased surface water flow.

The report concludes that there will be a decrease in the amount of impermeable surface area after the new store is developed (that decrease being 1,690square metres). It therefore concludes that this decrease will reduce the risk of flooding from overland flow and given that the site is located within flood zone one as identified by the Environment Agency where the risk of flooding is less that one in a thousand years the risk of flooding is low.

Loss of housing

The proposal involves the loss of six houses on site. Whilst these properties are of some age being associated as they are with the former use of the land as a railway, they are not in officer's opinion, of any very significant architectural merits that makes their retention fundamental. Given this, in architecture and design terms their loss is considered acceptable.

As units of accommodation their loss is regrettable and they are not being replaced by other units elsewhere. However their position on this site surrounded as they are by unrestricted employment uses which could operate at late/ early hours and have the potential to generate a considerable amount of noise and disturbance is highly undesirable. Given that the units are currently situated in such a low quality environment and that their retention as part of any supermarket scheme would also be undesirable it is considered that in this case that their loss is acceptable as part of the overall scheme.

Landscape and Visual Impact

The proposal is located on London Road in Amesbury and the building will be set back from the road a considerable distance and because of the ground levels will be set into the ground at the point at which it is to be built. The visual impact of the building therefore in views along London road will be limited.

There are wider views that could be had of the building from vantage points such as the A303 although the building would then be viewed in the context of the neighbouring Minton distribution park and the general building form of Amesbury as a town, as such and taking account of the assessments made in the ES it is considered that the building would not harm the visual amenities of its surroundings.

Air Quality

The stores construction has the potential to create dust both during demolition and groundworks however this can usually be adequately controlled by the use of relevant conditions. The ES concludes that the traffic generated by the proposed development is predicted to have an extremely small or very small impact on small airborne particle concentrations and a moderate impact on nitrogen dioxide concentrations. It goes on to state that the development will not cause any exceedances of the governments air quality objectives. Given this and the measures proposed to encourage sustainable transport use it is considered that air quality will not be significantly harmed to the extent that it merits refusal of this planning application.

Contamination

A site investigation was undertaken in 2007 which identified some areas of localised contamination. The applicants intend to carry out further groundwork investigations if planning permission is granted and the environmental health officer has recommended

suitable conditions be applied if planning permission were forthcoming. Various mitigation measures are proposed which could also be covered by condition.

Surface water drainage

Existing public foul sewers are suitable to accept flows from the development and the applicant intends to make new connections to these. Once occupied the drainage design is proposed to allow for oil and silts from parking areas to protect discharges from water borne pollutants and again this can be conditioned.

CONCLUSION

The need for a new supermarket in Amesbury is clear. It is a well known long held ambition of much of the population of Amesbury to provide a supermarket that represents real competition to the existing in town retailer (see preferred options questionnaire above). This proposal is likely to provide just such competition and choice on brownfield land within the existing settlement. It is a stated aim of the Amesbury Community Strategic Plan to address the “lack of choice and diversity in retail shopping” and to promote “another supermarket to provide competition for the existing Co-op”. This proposal would meet those aims.

However this proposal has to be judged in planning terms against national policy which requires Supermarkets to be located as close to existing town centres as is possible. PPS6 makes it clear that if sequentially preferable sites closer to the town centre are available these sites should be used prior to other sites further out of the town centre being pursued. The former Co op site within the town centre currently sits empty and can be reused as a retail unit alone or in combination with other land. Of most concern is the councils own retail consultants who conclude that the impact on convenience shopping in Amesbury town centre is likely to be in the region of 40%. This is in officers opinion significant and must be a matter of considerable concern to anyone wishing to continue to see Amesbury town centre as a vibrant, functioning retail destination.

It is officers opinion that the adverse impacts outweigh the benefits of this new supermarket and as such the planning application is recommended for REFUSAL.

Reasons for Refusal

- 1) *It is considered that the proposal for this A1 Foodstore conflicts with the aims and objectives of Planning Policy Statement six in that it represents a proposal for retail development outside of the existing town centre where a more sequentially preferable site exists in the town centre (the former Co-op store on Salisbury Street) as such and in view of its out of centre location it is considered the proposal could have an adverse impact upon the vitality and viability of Amesbury town centre including future investment in the town centre contrary to the aims and objectives of PPS6.*
- 2) *Insufficient information has been submitted to demonstrate that the proposed new food superstore would not have a detrimental effect on the wider road network and that the traffic from the proposed new store could be accommodated within the existing road infrastructure, as such it is considered that the proposal could have a significant effect on surrounding roads to the detriment of other road users and contrary to Saved policy G2 (ii) of the Salisbury district local plan.*
- 3) *The proposed new roundabout situated at the main access point to the site where it adjoins London Road is considered to represent an unacceptable design that does not meet the minimum standard for the design of such roundabouts as set out in the design manual for roads and bridges. It is therefore considered that this design of roundabout will compromise the convenience and safety of existing and future road users contrary to saved policy G2 (ii) of the Salisbury district local plan.*

SALISBURY DISTRICT COUNCIL

Review of proposed Food Superstores,
Amesbury

January 2008

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Signed:

1. INTRODUCTION

- 1.1 GVA Grimley was instructed in October 2007 to carry out an independent review of two proposals for food superstores in Amesbury.
- 1.2 In accordance with our terms of reference, we are instructed to review the retail policy issues raised by these proposals, based on the information submitted by the Applicants and drawing on the Salisbury Retail and Leisure Needs Study (RLNS) 2006 undertaken by GVA Grimley on behalf of the District Council.
- 1.3 We have not reviewed other planning policy issues raised by the proposals, such as design, access, highways and employment land; nor have we considered the weight which the District Council may wish to attach to other material considerations in determining the proposals.
- 1.4 This report is structured as follows:-
- In the next section we consider the scale and form of retail floorspace proposed.
 - In Section 3 we summarise the key policy tests which the proposals are required to meet.
 - In Section 4 we review the proposals against the key policy tests.
 - In Section 5 we summarise our initial conclusions and recommendations.

2. THE PROPOSALS

- 2.1 Both proposals are for the development of food superstores with associated parking on sites outside Amesbury Town Centre.
- 2.2 The proposed Tesco store is on a site on the northern edge of Amesbury on the London Road. The proposal is for a food superstore with a gross floorspace of 5,564sq.m, estimated to comprise 1,950sq.m net convenience goods sales and 1,022sq.m net comparison goods sales floorspace. The store is to be served by circa 358 car parking spaces.
- 2.3 The Asda proposals are for the development of a food superstore on Plot C1, Solstice Park. The proposed store comprises circa 6,131sq.m gross, and is estimated to comprise circa 2,415sq.m net convenience goods sales floorspace and 929sq.m net comparison goods sales floorspace. The Asda store is to be served by circa 360 car parking spaces.
- 2.4 Based on the information provided, the Asda store would comprise more convenience goods sales floorspace than the Tesco and is larger overall in terms of net sales (3,344sq.m net compared with 2,972sq.m net). However, it is not clear whether these figures are intended to be restricted by way of planning condition. This would need to be established with the Applicants before any weight could be attached to the difference in net sales floorspace/composition between the schemes.
- 2.5 It remains to be seen whether in the light of the recommendations of the competition commission the forthcoming revised national policy statement on planning for town centres (PPS6) will place more significance on competition, and suggest more weight may be given to the identity of potential operators. In this case neither retailer is currently represented in Amesbury, and therefore either proposal would provide choice and competition to the existing retail offer (notably Co-op). Both are successful retailers and either store would be likely to trade well.
- 2.6 Given that Tesco is already represented in Salisbury, and is one of the stores currently serving the Amesbury area, there may be some differences between the trading patterns of the two proposals. In particular a new Tesco of the size proposed in Amesbury would be likely to retain a higher proportion of trade currently lost to Tesco in Salisbury. Conversely, Asda which is not currently represented in the area, may potentially attract trade from further afield, and be capable of attracting trade from the Salisbury catchment.

- 2.7 However, in terms of the key planning issues i.e. need and impact on Amesbury, the consequences of these differences are unlikely to be significant. Therefore leaving aside any significant differences between the proposals in terms of their net sales floorspace and food/non-food split, we would not recommend that the Council attaches any particular significance in planning terms to the identity of the operator. We consider that the proposals raise similar retail planning issues, which we review in the following sections.

3. KEY POLICY TESTS

3.1 Relevant policy guidance is set out in PPS6, published in 2005. The Government indicated its intention to issue a revised policy statement on retailing and town centres during 2007, although this appears to have been delayed pending the conclusions of the ongoing Competition Commission.

3.2 Paragraph 3.4 of PPS6 sets out the key policy requirements. Applicants are required to demonstrate:

- the need for the development;
- that the development is of an appropriate scale;
- that there are no more central sites for the development;
- that there are no unacceptable impacts on existing centres; and
- that locations are accessible.

3.3 The guidance indicates that as a general rule, new developments should satisfy all the key policy tests and in reaching a decision Local Planning Authorities should also consider relevant local issues and other material considerations. The guidance indicates at paragraph 3.7 that the level of detail and type of evidence and analysis required should be proportionate to the scale and nature of the proposal.

3.4 We expand on the key tests below.

Assessing Need

3.5 Both proposals are appropriately defined as 'out of centre' in policy terms, and as such paragraph 3.9 indicates that need must be demonstrated where such proposals are not in accordance with an up to date development plan strategy.

3.6 The guidance indicates that wherever possible, quantitative need assessments should be based on the assessment carried out for the development plan document, updated as required, and should relate to the class of goods to be sold from the development. The guidance indicates that local planning authorities should also consider whether there are qualitative considerations that might provide additional justification for the development.

Securing the Appropriate Scale of Development

- 3.7 The guidance indicates that an indicative upper limit for the scale of development which is likely to be acceptable in particular centres may be set out in development plan documents. Where this is not the case, or where a development plan document is out of date, the guidance indicates the factors to be considered in determining the appropriate scale of development include the role and function of the centre within the wider hierarchy and catchment served.

Sequential Approach

- 3.8 Paragraph 3.13 indicates the sequential approach should be applied to all development proposals for sites that are not in an existing centre or allocated in an up to date development plan document. The relevant centres in which to search for sites will depend on the overall strategy in the development plan, the nature and scale of the development, and the catchment which it seeks to serve. In this case the main focus of search would be Amesbury Town Centre.
- 3.9 In applying the sequential approach, developers and operators should be able to demonstrate that they have been flexible about their proposed business model in terms of its scale, format, car parking provision and scope for disaggregation. Local Authorities should be realistic in considering whether sites are suitable, viable, and available, and take into account genuine difficulties which the Applicant can demonstrate are likely to occur in operating its business model from the sequentially preferable site.
- 3.10 For retail proposals in out of centre locations which comprise a group of retail units, Applicants should consider the degree to which the constituent units within the proposal could be accommodated on more centrally located sites. A single retailer should not be expected to split their proposed development into separate sites where flexibility and the scope for disaggregation have been demonstrated. Where it is argued that sequentially preferable sites are not appropriate, Applicants should provide clear evidence in terms of availability, suitability and viability.
- 3.11 In this case the retailers have a clearly defined business model i.e. a large foodstore, which has certain operational requirements in terms of servicing and parking requirements. If there is a proven need for a large foodstore, we consider it is legitimate to confine the search for alternative sites to those sites which are genuinely suitable, viable and available to meet these requirements, subject to the policy requirements to demonstrate flexibility.

- 3.12 Both assessments give some consideration to the availability of alternative sites within and on the edge of Amesbury Town Centre. Both assessments conclude that the sites are appropriately defined as out-of-centre in policy terms, and that if the need for a large modern food superstore is accepted, there are no alternative town centre or edge of centre sites which could be regarded as being suitable, viable or available within a reasonable timescale on which such a need could be accommodated.

Impact

- 3.13 PPS6 (Paragraph 3.20) requires impact assessments to be undertaken for any application for retail use in an out of centre location which is not in accordance with an up to date development plan strategy. Such assessments should have regard to, inter alia:

- the extent to which the development would put at risk a strategy for the area or town centre;
- the effect on future public or private sector investment needed to safeguard the vitality and viability of the centre;
- the impact on the trade/turnover and vitality and viability of existing centres; and
- the impact on vacant properties in the primary shopping area.

- 3.14 The guidance indicates the level and type of evidence and analysis required should be proportionate to the scale and nature of the proposal. Impact assessments should be provided for all retail and leisure developments over 2,500 sq.m gross but may occasionally be necessary for smaller developments such as those likely to have a significant impact on smaller centres, depending on the relative size and nature of the development in relation to the centre. Clearly both proposals require proper consideration of impact issues.

Accessibility

- 3.15 PPS6 requires that when considering new developments, local authorities should consider accessibility by a choice of means of transport including public transport, walking, cycling and the car. Local authorities should consider the distance of proposed developments from existing or proposed public transport facilities and the frequency/capacity of services and whether access is easy, safe and convenient for pedestrians, cyclists and disabled people. Local planning authorities should assess the extent to which developers have tailored their approach to meet the Government's objectives, for example through the preparation of

accessibility analysis, transport assessments, travel plans and the promotion of opportunities to reduce car journeys.

- 3.16 Local planning authorities should also consider whether the proposal would have an impact on the overall distance travelled by car.

Other Material Considerations

- 3.17 Local Authorities may take into account other considerations including physical regeneration, employment, economic growth and social inclusion.

Conditions

- 3.18 PPS6 advises that local planning authorities should consider using planning conditions to ensure the character of a development cannot subsequently be changed to create a form of development that the local planning authority would originally have refused. PPS6 advises that where appropriate, conditions should be used to:-

- Prevent developments from being subdivided into a large number of smaller shops or units;
- Ensure that ancillary elements remain ancillary to the main development;
- Limit any internal alterations to increase the amount of gross floorspace by specifying the maximum floorspace permitted (including for example the addition of mezzanine floors); and
- Limit the range of goods sold and control the mix of convenience and comparison goods.

- 3.19 No specific conditions are proposed in the respective Applicants' retail assessments. However, a breakdown of net sales floorspace, and convenience/comparison goods floorspace has been used in order to assess the proposals, and in the event that planning permission was granted for a food superstore we would recommend that consideration is given to the use of conditions to this effect.

4. REVIEW OF THE PROPOSALS

4.1 As both proposals involve a foodstore located on an out-of-centre site, both Applicants acknowledge the policy requirement to demonstrate need for the scale and form of development proposed; that a sequential approach has been taken to site selection, having regard to the requirements for flexibility etc, and that careful consideration has been given to impact. The policy also requires consideration of accessibility, together with other planning considerations, including where relevant the loss of employment sites.

(i) Need

4.2 Both proposals are supported by retail/planning statements. Jones Lang LaSalle (JLL) has undertaken a planning statement on behalf of Asda Stores Ltd dated October 2007, which considers issues of need, alternative sites and impact. GL Hearn (GLH) has undertaken a similar assessment on behalf of the proposed Tesco store, and its report dated 10th September also considers matters of need, scale, the sequential approach and impact.

4.3 Both assessments draw on the RLNS, and conclude that this study understates the capacity for additional convenience retailing in Amesbury Town Centre. The JLL assessment concludes that the study understates capacity on the basis of an error in the level of commitments incorporated in Amesbury. The GLH assessment draws similar conclusions, and concludes that after accounting for this error there is some additional capacity arising in Amesbury based on current market shares. Both Applicants assume that the former Co-op store would not be reoccupied by another convenience goods retailer.

4.4 We have reviewed the Amesbury convenience capacity modelling set out in the RLNS, and have identified two errors in the analysis. First, the inclusion of an erroneous market share in the capacity analysis for Amesbury appears to have led to an overestimate of its convenience goods turnover. The RLNS identifies a 2006 turnover of circa £18.2m rising £19.6m in 2011. Based on the correct survey data, we estimate that these figures should be £14.4m and £15.6m respectively, suggesting the study significantly overstates the potential available turnover in Amesbury based on the survey used at the time.

4.5 The second issue which warrants clarification is the deductions to allow for committed floorspace. The RLNS makes an allowance of £13m for committed floorspace, which appears to include an arithmetical error which overstates the potential turnover of commitments. The

only Amesbury commitment identified at the time was the new Co-op store estimated at 1,395sq.m net additional convenience goods floorspace, which at the Co-op company average turnover equates to a turnover of circa £7.3m. On this basis, employing the correct convenience turnover for Amesbury at 2011, of £15.6m, and taking benchmark sales of existing floorspace at circa £7.9m generates a notional surplus of £7.7m.

- 4.6 On this basis, taking the average turnover of the new Co-op store at circa £7.3m, if this store was in addition to the full reoccupation of the former Co-op store for convenience retailing, by a retailer with a similar turnover, it would largely accommodate the identified capacity. If the former Co-op store was only part reoccupied by a convenience goods retailer, this would generate a notional capacity of circa £3.1m of convenience goods expenditure by 2011 i.e. sufficient to accommodate the likely turnover of a discount foodstore in addition to the part reoccupation of the Co-op unit.
- 4.7 It is evident based on our reworking of the RLNS figures that there is some identified capacity for additional convenience goods shopping floorspace in Amesbury based on current market shares. The scale of capacity depends on the future of the former Co-op store. However, it is equally evident that while the level of capacity identified could accommodate another small supermarket/discount foodstore (subject to the future of the former Co-op unit), it would not support a new food superstore with a convenience goods turnover estimated by JLL on behalf of Asda at £37.1 and by GLH on behalf of Tesco at circa £27.5m.
- 4.8 In order to support this scale of additional floorspace, both proposals therefore rely on a significant increase in market share. Clearly there is no reason why Amesbury cannot or should not seek to increase its market share – the key issue is the impact arising from a larger store outside the town centre on the vitality and viability of the town centre. JLL, on behalf of Asda, has undertaken a 'ring fenced' capacity exercise which compares the likely turnover of existing convenience goods shopping facilities within the Amesbury catchment (using a notional 'benchmark' turnover) with total available expenditure within this area to suggest capacity of circa £74.1m of convenience goods expenditure within this area by 2011.
- 4.9 This is acknowledged to be a relatively crude exercise, and it is clearly unrealistic to expect Amesbury to retain all of the available expenditure generated within this area. However, we acknowledge that a large food superstore as proposed by Asda would be capable of increasing Amesbury's market share within this area. The issue, as identified in the RLNS, is the impact of such a development on Amesbury Town Centre.
- 4.10 GLH, on behalf of Tesco, also rely on a significant increase in market share in order to generate capacity. Unlike JLL, they have carried out their own independent household

interview survey and undertaken a more detailed assessment of current shopping patterns. This suggests that following the opening of the replacement Co-op store Amesbury's market share has apparently fallen (although the difference identified could readily be accounted for by the margins of error inherent in such surveys). GLH highlight they have employed a larger sample size than the survey which underpin the RLNS, and in our view any difference between the market shares is more likely to be accounted for by this factor than any actual decline in Amesbury following the opening of the replacement store.

- 4.11 On the basis of their more detailed analysis using the new survey data, GLH identify residual capacity in Amesbury in 2007 of circa £5.16m of convenience goods expenditure. This assumes no replacement convenience store for the former Co-op, which would go some way to meeting the identified capacity. On this basis, the revised GLH assessment broadly concurs with our own reworked capacity assessment i.e. that at constant market shares there is limited capacity of further convenience goods floorspace in Amesbury, if the former Co-op store were to be reoccupied by an alternative convenience operator.
- 4.12 GLH argue that it is inappropriate to assess capacity based solely on Amesbury's current, low market share, and has reworked its assessment on the assumption that Amesbury attracts 75% of available expenditure within core Zone 1. GLH assume that overall, Amesbury would be able to increase its market share from 22% to 48% of available convenience goods expenditure within the catchment area. On this basis, GLH identifies there would be residual convenience expenditure of circa £25.6m at 2009 which would be sufficient to support the estimated convenience goods turnover of the proposed Tesco store.
- 4.13 Of the two assessments, we consider the GLH approach employs a more robust methodology and is underpinned by a more detailed household interview survey. However, in essence, both assessments are based on the assumption that Amesbury is able to achieve a significant increase in market share as a consequence of the development of a new large food superstore as proposed. We do not dispute this conclusion. It is evident that the RLNS itself identifies that a large modern food superstore in Amesbury would be capable of achieving a significant increase in market share, by clawing back expenditure lost to competing food superstores in Salisbury and elsewhere.
- 4.14 It is also evident that in the absence of any alternative option, a large modern foodstore would provide additional choice and competition to the Co-op in Amesbury Town Centre and by reducing the need to travel for main food shopping, would be likely to reduce overall travel demand and achieve a more sustainable shopping pattern. In this respect the potential benefits of the proposals are not disputed. However, these benefits have to be considered

against any alternative options and the impact of the proposals on Amesbury Town Centre, which we consider later.

(ii) Sequential Site Assessments

- 4.15 We concur with the Applicants that if it is accepted that there is a need for a food superstore in Amesbury, of the size proposed, there is no sequentially preferable site within or on the edge of the centre. However, it is evident that neither applicant has thoroughly examined the potential for redevelopment of the former Co-op store. We understand that to date this has been marketed on the basis of a partial reoccupation by a convenience store, but the option of more comprehensive redevelopment has not been discounted. We consider the future of the former Co-op store has a bearing on the need and impact issues raised by the food superstore proposals, which we consider later.

(iii) Impact

- 4.16 The RLNS study concluded a broadbrush assessment of the impact of a new food superstore in Amesbury. The study considers two scenarios – a 1,800 sq.m net store and a 2,500 sq.m net store and indicates impacts ranging from 33% to 37% depending on the size of the store. The convenience goods floorspace component of both proposals falls within the range assessed in the RLNS.
- 4.17 The RLNS did not specifically consider the impact of the non-food element of any new food superstore. The main focus of the study was on the convenience goods impact, bearing in mind the key role which the convenience goods sector performs in underpinning the vitality and viability of Amesbury.
- 4.18 The impact assessment included within the RLNS incorporated the assumption that the convenience goods turnover of Amesbury Town Centre at 2011 would be circa £19.6m, which for the reasons outlined above represents an overestimate of the centre's turnover. Accounting for the error identified in the market shares used in the RLNS, the indicated convenience goods turnover of Amesbury is more likely to be in the order of circa £15m (as estimated by GLH on behalf of Tesco), based on a more up-to-date household survey which incorporates the opening of the replacement Co-op store.
- 4.19 GLH estimate the convenience goods turnover of the proposed Tesco would be £27.5m of which circa £5m, or 18% of the store's turnover, would be diverted from existing convenience retailers in Amesbury. Using GLH's assumption of Amesbury's current convenience goods

turnover of £15.31, this represents an impact of circa 33% on the town's convenience sector, with the assumption that most impact could fall on the Co-op. While significant, GLH highlight that at this level the new Co-op store in the town centre would still be expected to trade above its company average level.

- 4.20 JLL, on behalf of Asda, identify the store's convenience turnover at £37.2m i.e. nearly £10m more than the proposed Tesco. This reflects the higher convenience goods sales floorspace in the proposed Asda, and the higher turnover per sq.m figure employed. JLL estimate that £7.3m of the proposed store's turnover (just under 20%) would be diverted from convenience goods retailers in Amesbury. Using the RLNS estimate of Amesbury's turnover at £19.7m JLL estimate the Asda would have a 37% impact on Amesbury's convenience goods retailers. Using the more up-to-date GLH estimate of Amesbury's turnover at £15.3m, at the same level of trade diversion used by JLL the implied impact on Amesbury's convenience goods sector would be considerably higher, at circa 48%.
- 4.21 In practice notwithstanding the difference between the proposals in terms of net convenience goods sales area and sales per sq.m assumptions, assuming the more up-to-date turnover estimate for Amesbury represents the best available figure, we would expect either proposal to have an impact of circa 40% or more on the convenience goods sector of Amesbury. We anticipate the impact on Amesbury's non-food sector would be less significant, given the limited non-food offer of the town at present.
- 4.22 As identified in the RLNS, we consider at these levels of impact there would be a concern in respect of the overall vitality and viability of Amesbury Town Centre arising as a consequence of the impact on the main anchor store and on linked trips generated by this store to other local facilities which would be likely to be provided in a large food superstore. Most of the direct impact of a new out of centre superstore would fall on the Co-op, and this store is unlikely to close even at the levels predicted.
- 4.23 However, there would be a wider impact on other convenience retailers, both as a consequence of the direct effect of the 'instore' facilities to be provided (e.g. bakery, wet fish, butchers etc.) and the indirect effect of lost linked trips arising from the impact on Co-op.

(iv) Other Retail Considerations

- 4.24 We concur with both Applicants that even as a consequence of the levels of impact predicted, the new Co-op in Amesbury could continue to trade at or around its company average. We would not anticipate this store's closure as a consequence of the levels of impact predicted. However, we consider at the levels of impact predicted there would be a significant adverse

effect on Amesbury's vitality and viability, reducing the overall vitality and viability of the centre and leading to a broad impact on a range of other convenience retailers and services in the town which would be likely to be replicated at a large out-of-centre food superstore.

- 4.25 We have previously recommended that the Council investigates the prospects of a replacement foodstore operator taking the former Co-op unit. While this would not accommodate a superstore of the size proposed by the Applicants, the potential to accommodate a supermarket by redevelopment of the store and adjoining car park has not been ruled out. If this was a realistic option, it would be necessary to consider the additional implications of the food superstore proposals on this option, and the extent to which this would help to meet identified needs and provide further choice and competition.
- 4.26 The provision of another foodstore operator in the town centre, potentially occupied by a discount food retailer or a quality supermarket, would clearly have an impact on the current turnover of Co-op, and as a consequence the cumulative impact of a large out-of-centre food superstore on the viability of this unit would be more significant.
- 4.27 In the event that there is a realistic option to secure another supermarket in Amesbury Town Centre, to provide additional choice and competition to the Co-op, it would also be relevant to consider what if any risk a large out-of-centre food superstore would pose to securing such investment. In these circumstances we consider both the Applicants and, if necessary, the Council should investigate the future of this unit further before determining the current out-of-centre proposals.
- 4.28 On a related point, we have previously advised the Council in respect of proposals by Lidl for a discount foodstore outside Amesbury Town Centre. We concluded that there is likely to be capacity for this scale of additional convenience retailing in Amesbury, and that this type of development would provide a qualitatively different offer and would not give rise to the levels of impact and concerns which we have highlighted in the case of the current proposals. However, given the potential of the former Co-op store to accommodate this capacity we, advised that the Council should explore the availability of the former Co-op store before determining the Lidl proposals.
- 4.29 If following these investigations the Council concludes that the Lidl proposals are acceptable and resolves to grant planning permission for this development, it will be necessary to consider the cumulative impact of these proposals and the large food superstore proposals currently before the Council. At the levels of impact predicted in the case of the current food superstore proposals, if these levels of impact were over and above the more modest impact of a discount food operator our concerns would be compounded.

- 4.30 Given the importance of this issue, we recommend that the Council should investigate with the Co-op the current situation regarding the availability of this unit, and establish whether there is any realistic prospect of reoccupation of the entire unit and/or redevelopment of a larger site to accommodate a new foodstore capable of making a significant contribution to meeting the identified quantitative capacity and qualitative needs in the area.

5. SUMMARY AND CONCLUSIONS

- 5.1 The current proposals by Tesco and Asda are for large out-of-centre food superstores selling a mix of convenience and comparison goods.
- 5.2 We have reworked the retail capacity analysis undertaken as part of the RLNS. At current market shares we conclude that there is some modest quantitative capacity for additional convenience goods floorspace in Amesbury, although this identified capacity would not come close to supporting the scale of additional convenience goods floorspace included in the current proposals. Depending on the future of the former Co-op store in the town centre, there may be capacity to support a more modest supermarket or discount foodstore based on constant market shares,
- 5.3 A new large food superstore, as proposed by Tesco and Asda, is potentially supportable based on a significant increase in Amesbury's market share. Consistent with our conclusions in the RLNS, we are satisfied that either proposal would be capable of increasing the level of trade retention in Amesbury, and would trade successfully. We have also previously acknowledged that a new large foodstore would provide additional choice and competition to the existing retail offer, and by reducing the need to travel would lead to potentially more sustainable shopping patterns.
- 5.4 There is no reason why Amesbury Town Centre cannot and should not aspire to increase its market share. However, we have highlighted that a large food superstore outside the town centre would be likely to lead to a significant impact on the vitality and viability of Amesbury Town Centre. It is also necessary to thoroughly examine whether there are any more central opportunities in Amesbury Town Centre which could contribute to meeting an identified need.
- 5.5 Depending on the future of the former Co-op store in Amesbury Town Centre, and the Council's determination of the current application for a discount foodstore submitted by Lidl on land at London Road, these proposals would be likely to address the modest capacity identified based on Amesbury's current market share and provide additional choice competition to the Co-op store. Clearly in policy terms a replacement foodstore in the former Co-op unit will be the preferred option and would contribute to meeting identified needs. If this option is not available, permitting an out-of-centre discount foodstore may be acceptable in policy terms, and would provide for additional choice and competition without leading to a significant impact on Amesbury Town Centre.

- 5.6 Tesco and Asda estimate the impact of their proposals on the convenience goods sector of Amesbury at between 33% - 37%. Based on the most up-to-date estimate of Amesbury's current turnover, estimated by Tesco at £15.3m, the impact of the Asda store would be significantly higher, i.e. well in excess of 40% on the basis that this proposal incorporates a higher proportion of convenience goods floorspace and Asda have assumed a higher store turnover. In practice we consider the impact of either store will be likely to be circa 35-40% but could be higher.
- 5.7 At these levels of impact, we anticipate the new Co-op store in Amesbury Town Centre would still be likely to trade at or about company average and we would not expect this store to be at risk of closure. Clearly the cumulative impact of one or both of the current proposals, in addition to a replacement foodstore in the former Co-op unit (and/or a discount retailer such as Lidl located outside the town centre) would lead to a much more pronounced impact on this store, although in our experience it is still unlikely that it would be vulnerable to closure.
- 5.8 However, we remain concerned that the impact of either proposal on Amesbury's convenience retail sector would be significant, and that the consequences of a large full line superstore would be a more broad based impact on both the Co-op store and other local retailers who are likely to benefit from linked trips generated by this town centre 'anchor'. In contrast to the more modest impact of a discount food retailer, as previously advised, either of the large food superstore proposals would be likely to include a range of in-store facilities and to largely replicate the every day convenience and services offer of Amesbury Town Centre.
- 5.9 We acknowledge that these concerns need to be balanced against the additional choice and competition and more sustainable shopping patterns which could be achieved by one of the current proposals. In our view in purely retail planning terms we consider the potential harm to Amesbury Town Centre would outweigh these benefits, although we recognise this is essentially a planning judgement which officers and members of the Council need to reach.
- 5.10 However, we would strongly recommend that further investigations are made to establish the future of the former Co-op unit in the town centre, and that any consideration of the current food superstore proposals also needs to have regard to the Council's position on the other discount foodstore proposals in Amesbury. The Council should carefully consider the opportunities to accommodate further convenience retailing in the town centre, and to have regard to the potential cumulative impact of the current proposals and any other proposals before the Council at the current time.
- 5.11 In the event that the Council decides to support a large food superstore in Amesbury, we do not consider there is any clear retail planning basis to differentiate between the two sites or

operators, although the Asda proposals are indicated as having a significantly higher convenience impact. We have not considered other planning policy considerations or material considerations which may have a bearing on the decision of the Council.

- 5.12 In the event that the Council resolves to approve a new food superstore in Amesbury, we recommend that the Council determines which proposal it is minded to support, and the planning grounds for doing so, and explores the use of planning conditions governing the size/mix of store, range of in-store facilities etc. to minimise impact on Amesbury Town Centre.

Appendix 2

CJBG/smr/02A729630

13 March 2008

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DRAFT

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Dear Sarah

AMESBURY – SUPPLEMENTARY ADVICE ON RETAIL MATTERS

Further to our review of the proposed Lidl Foodstore dated November 2007, and subsequent review of the Tesco/Asda Food Superstore proposals which we completed in January 2008 you have requested our supplementary views on a number of further matters which have arisen since then, in order to inform your recommendation and deliberations in respect of the current Amesbury proposals.

Specifically, you have requested clarification of the implications of the current application received to redevelop the former Co-op Store in Amesbury Town Centre, which we understand is to comprise a development of a new foodstore for Sainsbury's comprising 3,082 sq.m gross (1,858 sq.m net), and the deliverability of this option. You also requested clarification of the cumulative effects of the Council permitting all or a combination of the current out of centre proposals and, in the event that the Council resolved to approve more than one of the current out of centre stores and these were not 'called in', the probability of two stores actually being built.

The context for this advice is well rehearsed and on the basis of our review of the various Applicants' supporting statements, there is a degree of consensus emerging in respect of the baseline and impact issues emerging to date. Specifically, it is broadly common ground that the new Co-Op Store in Amesbury is trading very strongly and on current market shares there is expenditure capacity for reoccupation of the former Co-Op Store if this was a viable/available option.

We have previously concluded that if this store is only partially reoccupied by a smaller convenience operator or a retailer achieving a low turnover there is likely to be sufficient capacity based on constant market shares for a discount foodstore type operation such as Lidl in the Amesbury area, and have concluded that the impact of such a store is unlikely to materially affect the vitality and viability of Amesbury. If the former Co-Op Store was to be reoccupied or redeveloped for a similar size store capable of accommodating the requirements of a discount type food operator, this would go some way to meeting an identified need and provide choice/competition to the Co-op within the town centre, which is the preferred option in national policy terms.

As far as the current proposals for large out-of-centre food superstores are concerned, it is common ground that a store of this size is not supportable based on Amesbury's current market share, but there is a realistic expectation of a new large food superstore being able to increase the amount of trade retained in the Amesbury area, with the attendant benefits of increased choice/competition. The issue is the impact of such a development and, in the light of the latest proposals for the former Co-Op Store, whether a large quality foodstore could be accommodated in the town centre in line with policy guidance.

In common with the Applicants, we estimate the impact of a large food superstore outside Amesbury is likely to be circa 40% although the estimates vary depending on the turnover of the new store, the assumed turnover of the existing retailers in Amesbury and detailed trading assumptions. Assuming the impact of a single store is of this order of magnitude, our overall conclusion is that such a development would lead to a significant adverse impact on Amesbury Town Centre, but would be unlikely in itself to lead to the closure of the Co-Op Store. Failure to do so would potentially leave a decision to allow an out-of-centre proposal open to a 'call in' by the Secretary of State.

It follows from our analysis that in order to reach a decision on the current out-of-centre proposals, the Council needs to consider carefully the suitability, viability and availability of the former Co-Op Store and potentially adjoining properties and the potential to contribute to meeting identified needs within Amesbury Town Centre in accordance with national planning policy guidance. There is a clear requirement for both the Applicants promoting out-of-centre stores, and the Council to consider carefully the potential of this option before supporting less central options.

To date, there appears to have been little progress made towards securing a replacement convenience operator for the former Co-Op Store. We understand the original intention was to subdivide the unit and secure a replacement convenience operator for part of the unit which for the reasons outlined above would in our view still leave some surplus capacity even based on Amesbury's current market share, and would not provide effective choice and competition to the new Co-Op Store. There have been discussions between the Co-Op and Aldi in respect of the potential reoccupation of this unit for a discount foodstore. More recently an application has been submitted for a foodstore comprising 1,858 sq.m net sales floorspace, which would be likely to comprise circa 1,600 sq.m net convenience goods floorspace. We understand that this proposal would involve the acquisition of adjoining land, including a Council owned car park although we do not have full details of the proposals.

We have previously advised that the Council needs to have thoroughly examined the potential of this town centre opportunity to accommodate a replacement foodstore, or redevelopment for a larger store, before supporting any of the current out-of-centre proposals. We have reviewed the comments submitted by Lidl dated 8th February 2008 and the previous comments of Atisreal which consider the suitability, viability and availability of this unit for their requirements, and their views on the likelihood of the reoccupation of the unit by Aldi, or redevelopment for Sainsbury's. We understand that indications have been given by Co-Op at the unit and/or site could be available for an alternative convenience retail occupier, although from the evidence available to us there appears to be a significant degree of uncertainty as to the genuine availability and suitability of this unit for a discount foodstore.

In our view the examples provided elsewhere where the Co-Op appears to have sought to oppose the development of competing foodstores in similar situations, and the apparent contradictory evidence as to its intentions for the Amesbury Store do not in themselves justify discounting this option at the current time. However, we consider the Council needs

to seek a clear commitment from the Co-Op as to its intentions for this unit in order to reach a decision as to whether this unit or wider site is likely to be suitable, viable and available to either an alternative discount foodstore, or to a larger quality supermarket, before it is able to support any of the current out-of-centre proposals.

If, on further investigation, the Council concludes that the former Co-Op Store would be suitable, viable and available for occupation by Aldi or another alternative discount foodstore this would meet the qualitative need for choice and competition and provide the benefits of a discount foodstore identified by Lidl. It would also go some way to meeting the identified capacity in Amesbury, based on current market shares, and reduce the level of over trading in the new Co-Op Store. In these circumstances, we consider the case for supporting an out-of-centre discount foodstore as proposed by Lidl would be significantly reduced.

In the case of a proposal for redevelopment of the former Co-Op Store, as part of a larger scheme to provide a store to accommodate a Sainsbury's, we have reviewed the comments of Atisreal in their letter dated 19th February 2008 and concur with their conclusion that, if viable, such a store would be likely to increase Amesbury's market share by changing the perception of Amesbury and providing a significant quantitative and qualitative improvement in the town's retail offer. This would substantially address the overtrading of the new Co-Op Store, but would be unlikely to seriously undermine its vitality and viability. The overall consequence of this option, if the Sainsbury's proposals are concluded to be suitable, viable and available, would be to provide materially improved convenience shopping facilities in Amesbury Town Centre, provide choice and competition, and to help to claw back into the town centre trade lost to competing large foodstores.

Subject to the realism of this option, and the Council's satisfying itself that it could genuinely be regarded as suitable, viable and available, we consider that such an option would largely meet a quantitative and qualitative need in Amesbury, and would materially reduce the justification for supporting any further out-of-centre convenience shopping provision in the area, in the current time. We are not able to comment on the realism of this option without undertaking a detailed audit of the planning/highways issues involved and the owners/developers/retailers intentions and commitments. However, such a proposal would inevitably be complex and problematical in planning/implementation terms.

While we consider the potential redevelopment of the former Co-Op Store for a Sainsbury's supermarket would meet an identified need, this option would still potentially leave a role for a discount foodstore operator in Amesbury. The Sainsbury's proposals would meet any identified quantitative need, but we acknowledge that a discount foodstore would provide additional choice and would to some extent be complementary to the roles of the new Co-Op and a new Sainsbury's store. In the context of the likely performance of the town centre Co-Op and new Sainsbury's store in this scenario, we consider the impact of an out-of-centre discount superstore as proposed by Lidl would be unlikely in itself to seriously undermine the viability of either store.

In the context of the significant improvement to the performance of the town centre as a whole, we consider the impact of the proposal would be relatively modest.

In the case of the current out-of-centre food superstore proposals, submitted by Tesco and Asda, we have previously advised that the impact of either proposal is likely to be in the region of 40% on the convenience retail sector of Amesbury Town Centre. At these levels of impact, we anticipate that the new Co-Op Store in the town centre would still be likely to trade at or about company average and would not expect the store to close, although we still remain concerned about the consequence of this level of impact for the vitality and viability

of Amesbury Town Centre. The consequence of the partial or total reoccupation of the former Co-Op unit in Amesbury Town Centre would be to reduce, to some extent, the current strong turnover of the Co-Op Store and as a consequence the impact of a large out-of-town centre on this town centre anchor store would be more pronounced although we still anticipate the store would be unlikely to close or be seriously affected in these circumstances.

In the event that the proposal to redevelop the former Co-Op Store to provide a larger unit for a quality foodstore operator like Sainsbury's was approved and implemented, for reasons outlined previously we consider this option would meet the quantitative and qualitative need and would be likely to secure an increase in market share and claw back trade into Amesbury Town Centre in line with national policy guidance. In these circumstances, the policy justification for supporting an out-of-centre large new superstore would be significantly diminished, based on the absence of need and the potential availability of a sequentially preferable site.

We also consider that in the event that the Council concludes the 'Sainsbury's' proposal can be regarded as suitable, viable and available, there must be a significant prospect that the grant of planning permission for a large out-of-centre superstore would be likely to prejudice this investment. We consider that it is extremely unlikely that a retailer like Sainsbury's would be prepared to commit to this development with the prospect of a large out-of-centre food superstore remaining. The prospect of prejudice to such a significant new town centre investment would further undermine the case for an out-of-centre food superstore in this scenario.

Finally, we have been asked to consider the issue of cumulative impact, and implications of the Council deciding to permit more than one of the current out-of-centre foodstore proposals. For reasons outlined above, we consider it is impossible to divorce this issue from the question of the potential re-occupation or redevelopment of the former Co-Op Store as this fundamentally affects the need and policy justification for any out-of-centre store, and also has a material bearing on the impact arguments.

If the Council concludes that there are no realistic options for re-occupation of the former Co-Op Store in its entirety, or redevelopment for a larger foodstore, we consider the impact of an out-of-centre discount foodstore as proposed by Lidl would be relatively insignificant. The Co-Op Store would be likely to continue to trade above average and the impact on other convenience retailers in the centre would be extremely limited. The impact of a large out-of-centre food superstore, as proposed by Tesco and Asda, would be circa 40%, and while the new Co-Op Store would still be likely to trade at or above company average in this scenario we consider the level of impact would be likely to lead to a pronounced adverse affect on Amesbury's vitality and viability.

We have not previously considered the cumulative impact of permitting both large out-of-centre food superstore proposals, and/or the Lidl proposal. Dealing first with the cumulative impact of allowing one out-of-centre foodstore and the Lidl proposals, this would clearly lead to a level of impact above the circa 40% projected in the case of the food superstore proposals alone. There would be some element of "mutual impact" between the new food superstore and discount foodstore and for the reasons outlined previously, we consider the impact of the discount foodstore itself is unlikely to be significant. If a non food superstore and discount foodstore were permitted and developed this would compound our concern about the overall impact on the convenience retail sector of Amesbury based on its current representation (i.e. the new Co-op store) and could prejudice securing new investment in a replacement operator or wider redevelopment of the former Co-Op Store (if this proves a realistic option).

If the Council was minded to approve both the current out-of-centre food superstore proposals, and assuming the applications were not "called in" and both operators proceeded to build and open new stores, there would be a significant "mutual impact" between the stores themselves. Both stores would be likely to trade significantly below the retailers normal expectations, and in practice in our view the prospects of both operators building and opening new stores in the circumstances would be remote. However, in the unlikely event of both proposals being permitted and not called in by the Secretary of State, and ultimately being built and occupied, their cumulative impact on Amesbury Town Centre would be significantly above the 40% figure estimated for a single store.

At this level of impact, we consider the impact on the Co-Op, and 'knock on' effects on other retailers in Amesbury would be very significant, and would be likely to seriously undermine the vitality and viability of the town centre. In these circumstances, if the Council was minded to support an out-of-centre superstore, we would strongly advise against resolving to permit both.

I trust this clarifies our advice on this issue, but please do not hesitate to contact me if you need to discuss.

With best wishes,

Yours sincerely

CHRIS GODDARD
Executive Director
For and On Behalf of GVA Grimley Ltd

22nd April 2008
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SP1 3AH

Salisbury District Planning Department	
Rec. 23 APR 2008	
Acknowledged	-----
Copy to	-----
Action	----- <i>AM</i> -----

GL HEARN 

Dear Mr Madge,

**PLANNING APPLICATIONS ON BEHALF OF TESCO STORES LTD AND GREGORY
DISTRIBUTION LTD REFERENCE: S/2007/1865 & S/2008/572**

**Proposed Retail Store (Class A1 Use), Associated Car Parking, Landscaping,
Alterations to Access and Direction of Freestanding Wind Turbine on Land and
Buildings at 140 London Road, Amesbury, SP4 7EQ**

I refer to the helpful meeting with yourself and Sarah Hughes on 17th April 2008, when we discussed the above two planning applications, which you advised should be considered at the 8th May committee at the same time as the planning application for a Food Store submitted on behalf of Asda. You advised that you would need to complete your committee report by no later than the 25th April, hence I trust the timing of this letter is helpful, being in advance of that date.

In respect of both Tesco applications, which of course are essentially for the same development and supported by the same documents, it is helpful that there are no outstanding issues relating to the submitted Environmental Statement and there are no outstanding issues relating to matters of detailed design, layout or landscaping associated with the scheme.

I also confirm for the avoidance of doubt that the proposed Tesco Store would not include either a pharmacy or a post office and if you considered it necessary, we would have no objections to imposition of a condition to that effect.

Your email (18/04/08) asked for clarification on security measures for the car park. Tesco Stores Ltd has confirmed that there would be security at the site and they would provide measures to secure the car park if it is being abused out of opening hours. If it was considered necessary we would accept an appropriate planning condition.

While you have yet to complete your report to committee in respect of the two Tesco planning applications, you advise that there are two issues which lead you to recommend refusal and one other outstanding matter. The two issues are:

Retail impact on the town centre

Employment policy

The outstanding issue is the response of the County Highway Authority in respect of highway matters.

We discussed all three and I trust that my clarification was helpful and could lead you to reconsider in respect of retail impact and employment and that the expected response of the County Highway Authority will resolve the third issue.

RETAIL MATTERS

Retail Need

The retail planning context for consideration of the Tesco planning applications must now include the resolution by SDC to grant planning permission for the Lidl discount store on land at the Minton Distribution Park to the north east of the Tesco site. That resolution requires a prior Section 106 Agreement restricting the range and type of goods to a discount operation.

If the Section 106 Agreement is signed and the permission issued and if Lidl trade from this site, then SDC will have approved a discount store for Amesbury, but not addressed the fundamental retail need acknowledged by all parties, namely the need for a major food store to address significant leakage to other towns.

The Sequential Approach

The SDC decision, in respect of Lidl, has also removed the uncertainty about the availability of the town centre site, at the former Co-op store and adjoining land, including Salisbury District Council car park. That site is now not available. Aldi has confirmed that the approval for a Lidl at the Minton site means that they have withdrawn any interest in pursuing a discount store in the town centre within the former Co-op building, whether or not indeed this opportunity was, realistically, available to them.

The submitted planning application by Frobisher on behalf of J Sainsbury, in respect of a site including the former co-op store, SDC town centre car park and adjoining third party land is still unregistered and Frobisher have appealed against the SDC requirement for an Environmental Impact Assessment. There is currently, therefore, no registered planning application in respect of a small food store in the town centre, but more importantly the letter from the Co-operative Group (CGP) to SDC 10th April 2008 confirms beyond doubt that the Frobisher scheme could not proceed as the Co-op land will not be made available. The statement from Ruairidh Jackson, Head of Planning and Property Strategy for CGP cannot be more clear:

"Finally, please also be aware that if Lidl is approved and Aldi withdraw the offer for our site, we will not remain willing to support the Frobisher scheme as a cumulative impact of both the Lidl and a new Sainsbury's on our store in the town centre is so high as to severely damage our interests".

At our meeting, Sarah Hughes referred to a SDC intention to promote an allocation for a food store within Amesbury town centre to include the former Co-op store site and the Council car park as part of the emerging LDF. Sarah advised that, that intention might be argued by SDC as indicating that a sequentially preferable site could be available when considering the Tesco applications. I repeat my concern about that approach and that any conclusion by SDC of such a future potential allocation could be argued, now, to demonstrate that this is realistically available, suitable and viable alternative site in the context of determinations by SDC of the Tesco scheme.

It would not be credible for SDC at a Committee in May 2008 (or even subsequently) to advance the argument that the town centre site comprising the Co-op store (not supported by the Co-op), a Council owned and well used car park and other third party land is a sequentially preferable site for a major food store to address the identified retail need, which would be satisfied by a Tesco food store.

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As recently as 10th April 2008, in determining the Lidl food store application for an out of centre site to the north east of the Tesco scheme, SDC determined that this town centre site was not a realistic option, i.e. not a realistic option in the context of a Lidl food store in out of centre location. There were no statements to members in April 2008 about a potential food store site being allocated in the town centre through the emerging LDF.

Notwithstanding the fact that this proposed town centre site would be of insufficient size to provide a food store of adequate scale to address the retail need, there is no certainty that a store of even a smaller scale would be approved, having regard to matters of detailed design, the Conservation Area context and highway/transportation issues. With the clear and unequivocal objection from the CGP, the major land owner involved, such a proposal would require the use of Compulsory Purchase Powers with no certainty of a CPO being successful. The SDC handling of the Lidl planning application, effectively allowing an out of centre discount store when the Co-op indicated they were willing to facilitate either a small supermarket or a discount store in the town centre would surely be a material consideration in a decision in respect of any CPO against the wishes of CGP.

In summary, if SDC were to advance the town centre Co-op/SDC car park/third party site as a sequentially preferable location in the context of the proposed Tesco store, any such judgement would be flawed and clearly contrary to the stance already taken by SDC in respect of the Lidl application.

Retail Impact

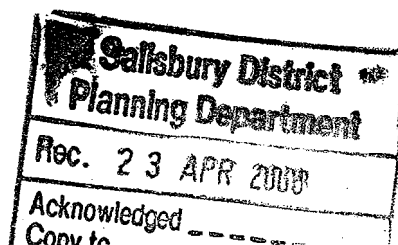
I appreciate that your "officer view" is informed by the GVA Grimley (GVAG) retail advice and I repeat my concern that you ensure members are provided with accurate advice in respect of all matters, including retail impact, if they wish to be informed on any differences between the Tesco and Asda schemes.

The GVAG advice to SDC January 2008 accepted the GL Hearn impact assessment of some 33% (32.5%) on the town's convenience sector (at 2009), with the assumption that most impact could fall on the Co-op. They also advised in the same report that the Asda stores convenience turnover would be nearly £10m more than the proposed Tesco, reflecting the higher convenience goods sales floor space in the proposed Asda. GVAG made their own assessment of impact for Asda, based on the more up to date GLH estimates of Amesbury's turnover, and concluded that the Asda impact on the Amesbury convenience goods sector would be considerably higher at some 48%.

The impact figure of 40% therefore that has been adopted by GVAG, and by SDC in the Lidl Committee report, represents an average of the two impact figures and should not be used as a figure to represent the likely impact of a Tesco store on Amesbury town centre convenience goods retailers. The correct figure accepted by GVAG is some 32.5% or as rounded by GVAG, 33%, at 2009.

It is accepted by GVAG, and all other parties in respect of these retail schemes, that the anticipated impact on Amesbury's non food sector (comparison goods) would be less significant given the limited non food offer of the town at present.

Following the SDC resolution to approve the Lidl food store, it is necessary to consider cumulative impact. The GVAG advice to the Council, accepted by SDC, is that the impact of the Lidl discount food store "on other convenience retailers in the centre would be extremely limited". On that basis, the cumulative impact of a Tesco food store and the Lidl store would be very little different to the assessed and agreed impact of the Tesco store alone, i.e. some 33%. Again it should be noted that the GVAG assessment of an Asda food store alone is some 48%.



We have consistently advised in respect of the Tesco proposal for Amesbury that SDC and Amesbury have a clear choice, either to accept some impact on Amesbury's town centre, but with the advantage of a modern food store in Amesbury, or accept the status quo. The overwhelming public response in respect of the food store applications is welcoming a new food store to address the leakage and provide Amesbury with the shopping provision it needs. Approving the Lidl discount store has not addressed this retail need and does not solve the problem. Rejecting a Tesco store will effectively maintain the status quo as there is no realistic prospect of the town centre site being made available for a food store, and even if it was, it would not be of sufficient scale to address the leakage i.e. to address the retail need.

SDC Committee Members should be prepared to take this important decision for Amesbury. Public preferences for one retailer over another must not be a material consideration and clearly the judgement by your Members will be on the basis of which site and scheme is acceptable. That should lead to approval of the Tesco scheme. It is accepted that there will be some impact on the town centre though GVAG confirm that it would not cause the closure of the existing Co-op store, even allowing for the Lidl proposal. The appropriate impact figure to consider (for convenience goods) is not 40%, but it is 32.5% in respect of Tesco and 48% in respect of Asda. There is a significant and material difference in impact on the town centre convenience goods turnover between the two proposals.

EMPLOYMENT POLICY E16

At our meeting I expressed my concern that your conclusions in respect of employment policy are clearly at odds with the interpretation of the same policy in the Committee report 10th April 2008 in respect of Lidl. You indicated that the use of the Gregory site and adjoining land for a food store would be contrary to your Policy E16 and hence a reason for refusal.

I referred you to the Committee report in respect of Lidl "Section 4 Employment Land", which concluded for an existing employment site, but which is not "allocated" as an employment site within the local plan (identical to the Tesco site) that:

"It is considered that the proposed development is an acceptable alternative employment use that provides a similar number and range of job opportunities".

As stated in the supporting documentation to the Tesco scheme, the new store will provide a new source of employment within Amesbury, with the provision of between 200-220 full time equivalent jobs, with usual employee numbers between 317-340 full and part time. We have also confirmed that the former Gregory Transport Depot, which comprises about half of the area of the application site, is an eyesore and is almost derelict and all existing commercial premises within the remainder of the site are being relocated to improved or purpose built premises nearby. The Great Western Ambulance Depot is due to be declared surplus for operational reasons and is to be relocated to new premises on Solstice Park.

Sarah Hughes also referred to employment land supply figures as a reason to refuse the application, on the basis that use of the site for a food store would thereby require additional new employment land. Such an objection is again inconsistent when no objection was raised in the context of the Lidl application on an existing employment site at the Minton depot on adjoining land.

The LPA has 36.65 ha of employment land committed (refer paragraph 6.3.17 of the GL Hearn revised ES) and needs to find only 0.35 ha in the whole Salisbury district in the period up to 2026 to meet the RSS requirement of 37 ha. Clearly the large allocation at Solstice Park is an important part of this long term employment reserve.

Based on the decision by SDC to approve the Lidl application, and with that decision informed by officers advice in respect of employment land policy relating to that site, it is inconceivable that SDC could appropriately base an objection to the Tesco scheme on this site in the context of the same policy considerations. The proposed Tesco development will provide acceptable alternative employment use that provides a greater number of job opportunities.

The existing job opportunities are not lost, as all commercial operations are being relocated within the vicinity.

HIGHWAY MATTERS

You confirmed our understanding that the Highways Agency has no objections to the Tesco scheme and I advised you that Tony Chapman of ADL anticipates that the County Highway Authority should provide you with a formal response in respect of the Tesco scheme this week. The only outstanding issue still being assessed by County Highways is the A345/London Road junction where the amended design is being fed into the VISSIM model. We are hopeful that their consideration of revised modelling will confirm its acceptability. We understand there are no other outstanding issues and I set out below a summary of the highway works and contributions which would form the basis of a Section 106 Agreement in respect of the Tesco scheme:

Highway Works

1. New roundabout on London Road to provide access to the development proposals.
2. New bus lay-by and two new bus shelters on London Road with real time bus information.
3. Provision of new cycle/foot way across the site frontage linking into the new cycle way to be provided by Lidl to the east of the site.
4. Improvements to the Countess Road signals to improve the capacity, geometry and pedestrian crossing facilities at the junction. Pedestrian crossing points will be added to the Countess Road, London Road and The Centre. The signal controller would be replaced with the latest signal technology with Mova 6 to provide the latest vehicle activated control system.

Contributions

1. £50,000 towards improving pedestrian and cycle facilities between the store and the town centre.
2. £275,000 to fund the provision of a new circular bus service 6 days a week for 5 years, linking the new store with the town centre, Solstice Park and Archers Gate.

Accessibility by Non-Car Modes

At our meeting, I referred to information which was submitted in support of the Asda application by Cottee Transport Planning assessing the number of people within associated catchments for both Asda and Tesco based on walking, cycling and bus journey times. In particular I referred you to drawing 0719/34a and 35a and the associated "Accession Population Comparison Table - Town Centre Link". This purported to make a comparison between population within certain walking, cycling and bus journey time distances of the Tesco and Asda stores and we would caution SDC on making any judgement in respect of either scheme based on this information. The Note to the Table indicates that the figures are based on applying 4 people per dwelling to each development, whereas you confirmed at our meeting that an appropriate figure would be some 2.36 persons per dwelling. The population figures presented by Cottee are not accepted even if the ratio is corrected.

The Tesco site is accessible by non car modes and located within the housing development boundary and adjoining existing housing in Amesbury.

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Summary

In refusing planning permission for housing and employment development on the Gregory Site in 2005, SDC recognised the potential of the site to accommodate a range of uses, including retail development. The resolution to approve the Lidl store in an out of centre location does not address the recognised need for a major food store to address leakage from the Amesbury catchment area.

If members wish to address the recognised retail need and support the views of the resident population, then planning permission should be granted now for a food store. It would not be credible to refuse the Tesco scheme on the basis that the retail need might be met at some time in the future, on the site of the former Co-op store, council car park and third party land. The Council has rejected that site as a realistic sequentially preferable site for a smaller (discount) food store as recently as 10th April 2008.

The Council's resolution to approve Lidl was also based on the Council's judgement that such a proposal was not in conflict with Policy E16 and it would be inconsistent and indefensible to use Policy E16 as a reason to refuse the Tesco scheme.

The proposed Tesco site is previously developed land, a brown field site, including a derelict transport depot which has been vacant since 2000 and is an eye sore. All existing commercial operations on the remainder of the site are being relocated to better premises and the scheme will ensure the provision of between 200-220 full time equivalent jobs, with the usual employee numbers between 317-340 full and part time.

Amesbury needs a food store which will address the existing significant leakage of shopping trips from its catchment area. Of the competing proposals the Tesco scheme should be approved as:-

- It is closer to the town centre.
- It is not an allocated employment site.
- There would be less impact on the town centre convenience goods trade and less impact on the town centre as a whole.
- The scheme is deliverable.

Tesco Stores Ltd and Gregory Distribution are prepared to enter into an appropriate Section 106 Agreement covering the matters referred to above in relation to highway works and financial contributions and the proposed scheme is entirely deliverable. We confirm the acceptability to Tesco Stores Ltd of a condition precluding a pharmacy or post office and we would be pleased to discuss any other appropriate planning conditions.

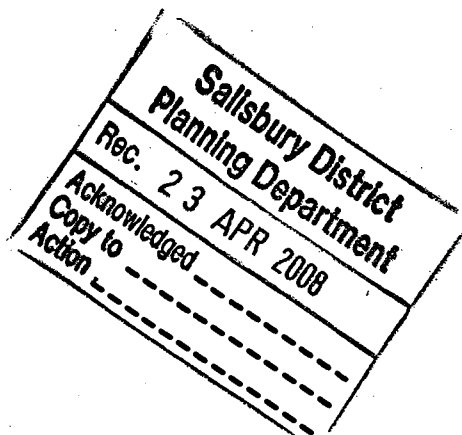
We would be pleased to meet to discuss any of the above or indeed any other outstanding matters if that would be helpful.

Yours sincerely,



MIKE BEESE
PLANNING DIRECTOR
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cc - T Robinson
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By email & post

Our Ref: MC / 0719

2nd May 2008

Mr Allan Creedy
Environmental Services Department,
Wiltshire County Council,
County Hall,
Bythesea Road,
Trowbridge,
Wiltshire.
BA14 8JD

Dear Mr Creedy,

Plot C1 Solstice Park Amesbury - Application Number S/2007/2226

I write in regards the proposed reason for refusal number 4 relating to accessibility.

The reason for refusal includes the phrase "...not conducive to **anything other than car borne customers** contrary to the aims of PPG13 and PS1." My emphasis.

This cannot be the case and in my view is an unreasonable and unrealistic position for Wiltshire County Council (WCC) to adopt given the improvements proposed and evidence provided in the TA, Supplementary TA and other communications with WCC over the past 9 months.

As you are aware my company has been discussing accessibility issues with your team since before the application was submitted. I have been involved in detailed dialogue with your colleague Mike Crook in regards improvements to the scheme and it has been modified in line with our discussions which have involved an iterative approach to the exchange of ideas and the submission of various draft plans in reaching the scheme before Members.

In particular, you will be aware of the dedicated footway/cycleway including a crossing on Sunrise Way to provide a good quality connection for residents directly to the store entrance. This was discussed at length with your colleague and is additional to the new crossings on Porton Road. The Supplementary TA shows the comprehensive cycle connections available locally. In the committee report the route between residents on the eastern side of Porton Rd and the site is discussed and it is suggested that they wouldn't walk to the store because they would need to cross Porton Rd twice. This is unrealistic since the extra walk distance for residents on the eastern side of Porton Rd is only 19m and crossing facilities are provided. To suggest that people would walk along an uneven narrow verge rather than walk an extra 19m defies logic. In any event a contribution towards a pedestrian footway on the eastern side has been put forward in order that the council can deliver a footway on the eastern side. Plans showing the walk distances were provided to you on the 17th January 2008.

The suggestion that the development is not conducive to anything other than car travel is completely at odds with the fact that the site is within walking distance of a very large resident and employment population. A reasonable walk distance to a store for food shopping is around 1km. From the analysis undertaken in the TA this includes local residential areas and anticipated

employment population totalling around **9500 people (para 5.12 of the TA)**. This is a very large population and given the high quality pedestrian and crossing routes provided linking the store with the residential and employment areas, for WCC /SDC to claim that only car borne trade will occur, is highly unrealistic. The same argument applies to cyclists except larger populations are involved, again as detailed in the TA.

As you know we have held detailed discussions with your public transport colleague to devise a suitable bus route, bus contribution and frequency/timing of service. Following further discussions ASDA proposed an additional contribution to the Solstice Park bus to cover the peak hours. I attach an extract of our meeting note sent to you on the 12th August which discussed the proposed ASDA bus route:

"2.Discussions took place on how to best serve the site by bus. PG advised that the best solution would be to run a new service (a route was discussed and provisionally agreed) 0900-1500 at a cost of approximately £50k per annum over 5 years. This is likely to be the absolute cost with the service provider retaining the fares. PG advised that such a service could be commercially viable after that time. I agreed to draw up the route and submit to PG. He will then forward to Wilts and Dorset Bus Company for a quote. The costs would be dealt with via a S106 agreement. The bus would be a 30 seater low floor vehicle. PG mentioned that it would be good to reintroduce a bus on Antrobus Road. A bus stop plus shelter and real time information display would be required. DT should be contacted to find out more information on this."

The committee report refers to the walk distance to the bus stop and suggests that the car park represents a barrier to pedestrian movement. This is unreasonable. The bus stop is located 108m i.e. about a third of the maximum recommended 300m in the document 'Planning for Public Transport in Development' and one quarter of the 400m distance indicated in RPG10 Annex A. In addition, there is a dedicated covered walk way between the bus stop and the store entrance. Furthermore, there is a bus shelter, ramp and low floor kerbs to assist disabled access. It is therefore unreasonable for WCC to conclude that the scheme will not involve anything other than car borne trade.

For the avoidance of doubt the full package of accessibility related measures are set out below:

- 1) £55,000 per year for a period of 5 years (total £275,000) for an ASDA bus service.
- 2) £18,000 for a period of 3 years (total £54,000) for the Solstice Park bus.
- 3) £25,000 towards improving pedestrian/cycle facilities on Porton Road in addition to the infrastructure shown on the plans.
- 4) £50,000 towards providing a footway/cycleway towards Bulford or, if this proves not to be viable, for other pedestrian/cycle improvements which would benefit those travelling to the site.
- 5) Three new pedestrian / cycle crossing facilities, two on Porton Rd and one on Sunrise Way.
- 6) New bus stops on Porton Rd to serve the development and local residents and a covered walkway between the store entrance to the bus stop on Porton Rd.
- 7) Improved pedestrian and cycle facilities linking the site with the local residential areas.
- 8) Covered cycle parking on site.
- 9) A Travel Plan to encourage non car travel linked with the Solstice Park Travel Plan.

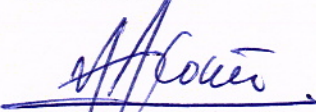
Based upon the above comprehensive proposals to enhance the non car accessibility of the site, I consider it is very likely that the site will attract a substantial number of non car trips.

Notwithstanding the concerns associated with the lack of balance given by WCC to the consideration of the accessibility enhancements, during my discussions with Mike Crook he

requested that the £50,000 contribution towards the Bulford Link could be used for other pedestrian/cycle improvements locally. His reasoning was that he was not wholly convinced that the full funding could be achieved, and that viability could be an issue. My client has given further consideration to his point and since the reason for refusal is concerned principally with accessibility, they are prepared to **increase the contribution by £100,000 to £150,000** to ensure that the link can be established. As you will recall the Supplementary TA included justification for the link at Appendix C. ASDA consider that £150,000 will be sufficient to fund the construction of the link.

Please communicate my concerns regarding the lack of balance afforded to my client's accessibility proposals to Members, the reasoning behind this, and the fact that they propose to increase the funding for the Bulford Link to give a much improved chance of delivery.

Yours sincerely,



MIKE COTTEE
Managing Director

E-mail: mike@cottee-tp.co.uk

- cc. Judy Howles – Salisbury DC (letter by post and email)
- cc. Cliff Whitley - Solstice Park (letter by email)
- cc. Hannah Murray/John Littman - Jones Lang LaSalle (letter by email)
- cc. Tony Marsh – HGP Architects (letter by email)
- cc. David Howson – Cottee TP (letter by email)
- cc. Barney Harle – Asda Stores Ltd (letter by email)
- cc. Sue Smales – Asda Stores Ltd (letter by email)

Direct email: rebecca.leaman@tymconsult.com

Your ref: S/2007/2226

Our ref: PSF/A/07/05832

Somerfield Store No: 2346

7 May 2008

Development Control
Planning Office
Salisbury District Council
61 Wyndham Road
Salisbury
SP1 3AH

FAO: Mrs J Howles

Dear Sir/Madam,

PROPOSED ASDA STORE, SOLSTICE PARK, AMESBURY (PLANNING APPLICATION REFERENCE: S/2007/2226)

Roger Tym and Partners (RTP) act on behalf of Somerfield Stores Limited, who operates a store at Mid Summer Place, Solstice Park, Amesbury. We understand that an application has been submitted at Solstice Park for a retail store of some 6,076 sqm gross (65,400 sqft gross).

We submitted a holding objection on the 17 April 2008 in order to allow us to fully examine an assessment by GVA Grimley, undertaken on behalf of the Council, of the Asda application and an application by Tesco for a foodstore at another site in Amesbury.

Having considered both GVA Grimley's assessment and the planning statement submitted in support of the application by Jones Lang LaSalle, we wish to object to this application for the following reasons:

- Based on existing market shares there is insufficient quantitative need for the proposed store;
- The assessment of need undertaken by JLL, which assumes some clawback of expenditure, is flawed and does not adequately demonstrate quantitative need;
- Even if quantitative need could be satisfactorily demonstrated, the qualitative arguments on which it rests (that the clawback of expenditure would improve shopping provision for people in the Amesbury area and that there would be sustainability benefits through shorter journeys) must be weighed against the likely impact of the proposed store on Amesbury town centre, and in our view the impact will be significant;
- The potential of the former Co-op site has not been properly investigated.

ROGER TYM & PARTNERS
Planners and Development Economists

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at any of our offices

BY EMAIL AND POST

We set our concerns in detail in an annex to this letter. We would be grateful if you would if you acknowledge this letter as an objection duly made and contact Rebecca Leaman of this office if you have any further queries.

Yours faithfully,

Roger Tym & Partners

Encs

cc Nick Sealy, Somerfield Stores Ltd

ANNEX

Policy Context

1. In reviewing the planning policy background, it is clear that the site for the proposed Asda store is 'out-of-centre' as defined by PPS6. On this basis, the key retail considerations that the applicants must address are as follows:
 - Whether there is a demonstrable need for the proposal;
 - Whether sequentially preferable sites are available;
 - Whether the proposal would undermine the vitality and viability of existing centres.
2. We have analysed the planning statement prepared (revised January 2008) by Jones Lang LaSalle (JLL), which has been submitted as part of the Asda planning application, and the GVA Grimley review of proposed food stores in Amesbury (January 2008). In the light of this information, we can now comment on whether the key three considerations (as outlined above) have satisfactorily addressed.

Need

3. PPS6 indicates that need must be demonstrated for any application for a main town centre use which would be in an edge-of-centre or out-of-centre location and which is not in accordance with an up-to-date development plan document strategy. This is one such proposal. There are two elements to the consideration of need: quantitative and qualitative.
4. Dealing first with quantitative need, the JLL assessment contends that at current market shares there is capacity for just under 1,000sqm net new convenience floorspace. GVA Grimley, on behalf of the Council, also identified some capacity (having made some corrections to their district-wide retail study undertaken in 2006), and although they note that the amount of floorspace is dependent on whether a town centre unit recently vacated by Co-op is taken up, they note that in any case there is insufficient capacity for the proposed Asda store. GVA Grimley rightly note, therefore, that there is insufficient capacity for a store of the size proposed by Asda, based on current market shares.
5. JLL undertake their own analysis of need, which implies a greater market share for Amesbury. However, it has two major failings. First, the catchment on which it is based is crudely drawn and an entirely artificial construct. It is based on postcode sectors, and therefore bears little relation to realistic travel patterns and the draw of nearby centres and major stores. Second, it then 'ring fences' the available spend, assuming that it is all spent within the artificially defined catchment. It is quite wrong to assume that none of the available expenditure will be drawn to centres and stores outside the catchment. For example, the catchment includes an area just west to Salisbury, which is considerably closer to Salisbury than Amesbury. It is therefore unrealistic to expect all the available expenditure to be spent within this defined area. GVA Grimley make exactly this point in their review of the JLL analysis.
6. But even if the quantitative need analysis was robust, the justification for the proposed clawback of trade, that is, the increase in market share of the Amesbury area, is based on what JLL consider to be the qualitative benefits of the scheme: first that there would be an improvement in shopping provision for people in the Amesbury catchment, and second that there would be sustainability benefits through, presumably, shorter journeys. However, this can only provide sufficient justification if there is little or no impact on the vitality and viability of existing centres. In our view the proposed store will have a substantial impact on Amesbury town centre, for reasons we set out below.

Sequential Approach

7. PPS6 indicates that sequential approach to site selection should be applied to all development proposals for sites that are not in an existing centre nor allocated in an up-to-date development plan document. This is one such development proposal.
8. JLL dismiss this site on the basis that it would not meet the quantitative and qualitative need they identify, but as we note above we do not accept their assessment of quantitative need. Moreover, the qualitative benefits to which they refer must be weighed against the impact of the proposed scheme. Finally, JLL do not explain why the improvements in shopping provision on which they

partly justify their scheme could be provided through a smaller store on the site of the former Co-op site.

9. We are not satisfied, therefore, that the applicant has satisfactorily addressed the potential of the site of the former Co-op site, particularly bearing in mind the advice in PPS6 which indicates that retailers should be flexible about their business model in terms of the scale of their development, the format of their development, car parking provision and the scope for disaggregation.

Impact

10. In considering the impact of the proposed Asda store, simply demonstrating need does not mean that the proposed food store will have no impact on Amesbury town centre. In any case, as highlighted above, we question the validity of the quantitative need analysis undertaken by JLL. We therefore welcome the assessment of impact by JLL in the planning statement submitted in support of the application.
11. Para 5.45 of the JLL planning statement acknowledges that the proposed store will 'undoubtedly reduce the turnover of the town centre' before going on to use GVA Grimley's estimate of impact on the town centre, some 37%. This is a very substantial impact by any standard, but surprisingly JLL see the question as simply 'whether it [the proposed new Asda store] would likely lead to store closures'. However, paragraph 4.4 of PPS6 highlights a number of other factors which should also be considered when measuring the vitality and viability of town centres. To argue that no stores will close, and thus that the vacancy rate will not increase, is too simplistic. If other factors are considered it seems very likely that there will be a negative impact on the vitality and viability of the centre. For instance, shop rents are likely to decrease as demand for units falls and pedestrian flows are likely to decrease as customers are attracted to the proposed Asda store. In our view, therefore, the JLL study has failed to properly address impact.
12. Whilst we agree there would be less of an impact on the comparison goods sector, with the greatest impact on convenience goods sales at the Co-op, there is still likely to be an impact on this sector, given that the proposed Asda store will have a non-food element. This will increase the probability of it becoming a one-stop-shop and therefore likely to reduce the number of linked trips in the town centre (between the Co-op and non-food stores in the centre).
13. We are also concerned about the impact the proposed store would have on the old Co-op site and the prospect of this unit being reoccupied by or redeveloped for a convenience store. This site would become significantly less attractive to a potential occupier if a large out of centre food store was granted, and may well remain empty for some time, with a negative impact on the environmental quality of the centre
14. Overall, we agree with the GVA Grimley assessment, which expresses concern about the overall impact the proposed store will have on the vitality and viability of Amesbury town centre, believing the proposed store would have a significant impact on the health of Amesbury town centre.

Summary and Conclusions

15. Having reviewed the planning statement by JLL submitted in support of the application and the GVA Grimley assessment undertaken for the Council, we have the following concerns:
 - Based on existing market shares there is insufficient quantitative need for the proposed store;
 - The assessment of need undertaken by JLL, which assumes some clawback of expenditure, is flawed and does not adequately demonstrate quantitative need;
 - Even if quantitative need could be satisfactorily demonstrated, the qualitative arguments on which it rests (that the clawback of expenditure would improve shopping provision for people in the Amesbury area and that there would be sustainability benefits through shorter journeys) must be weighed against the likely impact of the proposed store on Amesbury town centre, and in our view the impact will be significant;
 - The potential of the former Co-op site has not been properly investigated.

Katherine Ashley

From: Mark at one brown cow [mark@onebrowncow.co.uk]
Sent: 06 May 2008 15:36
To: JohnNoeken@salisbury.gov.uk; IanMitchell@salisbury.gov.uk;
DennisBrown@salisbury.gov.uk; Paul Trenell; MichaelHewitt@salisbury.gov.uk;
SarahDennis@salisbury.gov.uk; MartinLee@salisbury.gov.uk;
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JoBroom@salisbury.gov.uk; Development Control; postbag@salisburyjournal.co.uk;
rob@robertkey.com
Subject: Asda and Tesco planning applications S/2007/2226 and S/2008/0572

6th May 2008

Reference planning applications:
S/2007/2226 Asda Supermarket, Amesbury.
S/2008/0572 Tesco Supermarket, Amesbury.

Dear Sirs,

On Thursday 8th May planning decisions will be made by the Northern Area Committee which will have a major impact on the future of retail business conducted in Amesbury.

Since a new Tesco opened in Tidworth and with the opening of Asda in Andover, many residents of the Amesbury area now travel to these stores to carry out a weekly shop. I have spoken with many of my customers on the issue of supermarkets and most will tell you that a trip to either of these two towns is favoured over a trip to the Supermarkets in Salisbury, mainly because of traffic congestion on Southampton Road and Castle Street making for much longer journey times to the stores in Salisbury.

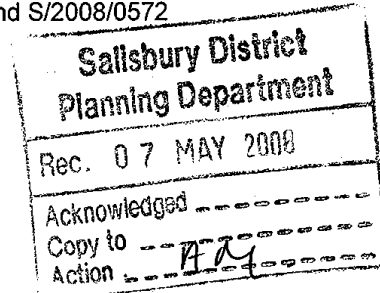
A town the size of Amesbury should have a choice of supermarkets so that local people are not forced to travel further a field, in addition, keeping shoppers local should mean that the retail outlets of the town in general will benefit from an increase in the number of people who shop locally instead of leaving our town to shop further a field. This in turn should attract new business to the town and help regenerate the town centre as a whole.

With reference to the town centre, the continued insistence that the old co-op site in Salisbury Street should be occupied with a store which includes a high percentage of food retail is no longer relevant. After the recent approval of a Lidl store on London Road, Amesbury, this decision to allow a store, which could have easily been located in the old co-op site, to develop elsewhere, means that the goalposts have been moved and any bearing the previous old co-op site conditions had on planning applications for food stores in Amesbury should now be effectively ignored.

With current requirements for a massive amount of new housing in the coming years would it not make more sense to allow a supermarket development on Solstice Park while setting aside the assorted mix of brown field sites on London Road for new housing. The impact on London Road of a supermarket and the associated high volume of traffic means a poorer quality of life for those living in the area of London Road, while in-fill housing would not only improve the area, but also have less impact on the local residents and London Road as a whole.

It does not take too much common sense to stand in either of the two proposed areas of development and see which one of the two applications is better situated for access, ease of use, impact on local roads and residents and over-all practicality for all those that wish to use a large supermarket. With this in mind it is clear to see why people I have spoken to favour the Solstice Park option.

I realise that a planning decision could be made to grant or refuse either



or both applications, but in my discussions with the people of Amesbury it is clear that most favour the idea of a new Supermarket in the town and that most favour the Solstice Park application, I only hope that you as the planning committee take on board local opinion from both residents and local businesses and conclude with an outcome which enables the town of Amesbury to go forward with a commercial development which allows the town to cater for the residents future needs while minimising impact on those same residents.

Mark Clemas
One Brown Cow Ltd
40 High Street
AMESBURY
Wiltshire
SP4 7DL

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**Salisbury District
Planning Department**
Rec. 07 MAY 2000
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Action _____