

Gregory Gray Associates

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Ms. Louise Crosby,
Inspector for Examination of Stevenage Local Plan,
c/o Louise St John Howe,
PO Services,
PO Box 10965,
Sudbury,
Suffolk,
CO10 3BF.

19th January 2017

Dear Madam,

STEVENAGE BOROUGH LOCAL PLAN EXAMINATION

Gregory Gray Associates are instructed by Wyevale Garden Centres Ltd. to make the following additional representation in relation to Matter 19 of the Stage 3 Hearings - Retailing and Town Centres. A separate letter is submitted in respect of Matter 9 of the Stage 2 Hearings – Retail and Town Centre Issues.

As the Inspector will be aware, our clients have a leasehold interest in Stevenage Garden Centre, Graveley Road, Stevenage which is identified as the site for a major new foodstore by virtue of Policy TC11 New Convenience Retail Provision of the emerging Local Plan. Our clients support this proposed allocation for the reasons set out in our previous representation dated 8th February 2016.

The following comments are made in response to the Inspector's published Matters and Questions and only relate to those issues directly relevant to our client's site and on issues which have been raised in our previous representation, as required by the issued guidance notes. The Inspector's numbering system is followed below for ease of reference.

Stage 3 – Matter 19 Retailing and Town Centres

1. Is the evidence on retail provision up-to-date and robust? How do current retail proposals fit within the overall strategy for retail development?

The Council's evidence on retail provision is provided in the Revised Stevenage Retail Study dated October 2014. This updated the original study to take account of increased population figures and projections, specifically the ONS 2012 based projections which suggested an increased population growth for Stevenage over the plan period to 2031 up to 98,000.

The ONS published 2014-based Subnational Population Projections on 26th May 2016 however these still predict a population for Stevenage in 2031 of 98,000 people. Accordingly

it is concluded that the figures used to underpin the Council's retail study remain valid such that it provides a robust and up to date assessment of future retail need.

The current retail proposals fit comfortably within a NPPF compliant strategy for retail development. Comprehensive plans for the revitalization of the identified town centre are proposed and the new allocations are of a scale and in a location which either follows the existing retail hierarchy or are carefully located so as to meet the needs of future residents, consistent with the principles of sustainable development which requires patterns of growth to be actively managed so as to reduce the need to travel.

3. What is the basis for the retail allocations?

With particular reference to the scale of the proposed new foodstore at Graveley Road, its scale is strictly based on evidence of retail need contained within the Council's Retail Study referred to above, and as referred to in our correspondence of the same date which relates to Stage 2 Matter 9 Retailing and Town Centres.

4. Are they justified and effective?

In order to be '*justified*', the allocations must provide the most appropriate strategy when considered against reasonable alternatives and be based on proportionate evidence. The proposed allocation of the foodstore under the terms of Policy TC11, is in an appropriate location to serve future populations, specifically the new urban extension of North of Stevenage (Policy HO3). In addition, as recognized in para. 7.71 of the explanatory text to Policy TC11, "*there are no alternative sites capable of accommodating a store of the required size*". Furthermore, the need and required scale of the proposed store has been fully justified by the conclusions of the Council's Retail Study.

To be '*effective*', an allocation needs to be deliverable over the plan period and based on effective joint working on cross-boundary strategic priorities. Our clients have previously confirmed that their current occupation of the site does not provide an obstacle to the deliverability of the site over the Plan period, such that this allocation is considered effective.

I would be grateful if the foregoing comments could be forwarded to the Inspector for consideration during the forthcoming Local Plan Examination.

Yours faithfully



Jo Male