

# 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,  
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Sudbury,  
Suffolk,  
CO10 3BF.

19<sup>th</sup> 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 9 of the Stage 2 Hearings – Retail and Town Centre Issues. A separate letter is submitted in respect of Matter 19 of the Stage 3 Hearings - Retailing and Town Centres.

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 8<sup>th</sup> 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 2 Hearing – Matter 9 Retail and Town Centre Issues**

#### **1. Does the approach to retail planning in the Plan accord with the principles set out in the Framework in relation to the vitality of town centres?**

The NPPF requires Local Planning Authorities to recognise town centres as the heart of their communities and pursue policies to support their viability and vitality (para.23). This '*town centre first*' approach is based on one of the core planning principles set out in the Framework, namely the need to actively manage patterns of growth to make the fullest possible use of alternative means of transport and focus significant development in locations which are or can be made sustainable.

The focus of Chapter 7 of the emerging Local Plan entirely accords with this principle and provides a comprehensive suite of policies that will secure the transformation of Stevenage Central, making it fit for purpose in the 21<sup>st</sup> century and securing its long term viability.

Although located outside of the identified town centre, the proposed allocation of the new foodstore at Graveley Road is still consistent with these principles. The need for additional convenience floorspace is based on projected population growth within the Borough over the Plan period. The Local Plan seeks to provide housing to accommodate this growth and envisages substantial housing development including as part of an urban extension to the North of Stevenage (Policy HO3).

Accordingly, it is entirely consistent with the principles of the Framework that the new convenience retail store required to meet the needs of future residents, be located in an area where these future residents will be accommodated.

It will provide a lower tier retail facility to serve the immediate needs of the local community and will not impact on the vitality of the main town centre, local centres or neighbourhood centres. This is secured by the final sentence of Policy TC11 which requires the submission of a retail impact assessment to support any future application.

6. What evidence is there to support the new convenience retail provision set out in policy TC11? Have the traffic impacts being modelled?

The evidence for the new convenience retail provision is provided by the Council's Revised Stevenage Retail Study dated October 2014. This identifies a total convenience need of 7612 sq.m over the plan period which results in a requirement for a trading floorspace of approximately 9,100sq.m when allowing for a 20% uplift to accommodate ancillary comparison goods.

The report recommends that at least 20% of this need is reserved to allow for extensions to existing convenience stores particularly in local centres, resulting in a requirement for a major new food store within the plan period of 7600sq.m. Policy TC11 entirely reflects this evidence.

Our understanding is that the traffic impacts of the proposed retail allocations were not specifically considered within the AECOM S-Paramics Model for Stevenage Town Centre.

The proposed retail allocations comprise extensions to existing stores or new floorspace either within or highly accessible to the residents of new developments. Their locations have been specifically identified so as to serve existing/future centres of population, thereby minimizing the need to travel on the road network. As a result, their provision has the ability to decrease the level of traffic movements generated by the new dwellings, below the levels envisaged within the S-Paramics Model. This is recognized by the Vectos Transport Technical Paper dated December 2016 which points out that the S-Paramics modelling does not take into account of "*the proposed development of communities that is planned and the internalisation of trips that will occur as a result of such a the proposed mix of facilities*".

Specifically in relation to the new foodstore proposed in Graveley Road, a technical note on Site Access and Parking was commissioned on behalf of the site's occupiers in March 2014

and has previously been submitted to the Local Planning Authority for information. A copy is also attached to this representation for the Inspector's consideration.

This examined the level of parking and the access arrangements required for a 6500sqm foodstore on the site currently occupied by Stevenage Garden Centre and assessed the existing and proposed level of traffic generation associated with the site, with reference to TRICS trip rate database.

It concluded that, whilst a new foodstore on the site would result in an increase in traffic at the site access, there is the potential that traffic will decrease on other parts of the road network as a result of the proposals. It also concluded that with the foodstore in place, the existing site access layout would continue to operate within capacity.

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

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jo Male', written in a cursive style.

Jo Male