

CONTACT OFFICER: Paul Chick

SITE ADDRESS: Land At Cribbs Causeway Almondsbury Bristol South

APPLICATION NO: 14/00851/K Other Consultations

EXPIRY DATE: 18 March 2014

Request for comments on an application submitted to an adjoining authority: Mixed use development of 51.49 hectares of land comprising: up to 1,000 new dwellings (Use Class C3); a 36-bed Extra Care Home (Use Class C2); a mixed use local centre including a food store up to 2000 sq.m. gross floor area (Use Classes A1, A2, A3, A4, A5, B1, D1, D2); a 2-form entry primary school; community facilities including a satellite GP surgery, dentist and community centre; associated public open space and sporting facilities; green infrastructure integrated with foot and cycle paths; together with supporting infrastructure and facilities including three new vehicular accesses. Outline application including

RECOMMENDATION: OBJECTIONS raised

South Gloucestershire Council :
Environment And Community
Services
PO Box 2081
Bristol
BS35 9BP

Development Control – 3 December 2014**Application No. 14/00851/K: Land At Cribbs Causeway Almondsbury Bristol South****BACKGROUND**

This application is a proposal for the development of the western part of the Cribbs Patchway New Neighbourhood, an allocated site within the adopted South Gloucestershire Council Core Strategy (December 2013) for the development of 5,700 dwellings, 50 hectares of employment land, open spaces, schools and community facilities.

The main elements of this application are proposals for up to 1,000 dwellings, a two form entry primary school and a mixed use centre including a food store of up to 2,000 sq m floorspace. The application is in outline with all matters reserved apart from access.

An application to consider development of 1,100 dwellings on the southern part of the Cribbs Patchway New Neighbourhood to the south and south west of Filton Airfield was considered by the Development Control (North) Committee at the meeting of 15th January 2014. The application was approved by South Gloucestershire Council at the end of January 2014 however the related Section 106 Agreement has not yet been signed.

KEY ISSUES

The key issues from the perspective of Bristol City Council are flood risk, retail impact and transport/highway matters.

FLOOD RISK

The Flood Risk and Asset Management Team comment as follows:

Areas near to the proposed development are known to be at significant risk of surface water flooding. This has been identified through the Bristol City Council Surface Water Management Plan (SWMP) and through known instances of flooding. There are concerns about the development increasing the risk to existing properties. The following comments are made in respect of the Flood Risk Assessment and Drainage Strategy Report submitted with the application.

The sequential approach to siting more vulnerable receptors in areas at lower risk of flooding is supported. However, so far only the risk of flooding from the main river has been considered. The Bristol SWMP should also be used to inform this approach. The agent should also contact BCC Flood Risk and Asset Management Team to obtain more detailed model results and information on historical flooding.

The restriction of off-site flow is supported, however, concerns are raised about the technical feasibility and sustainability of doing so.

The use of SuDS (Sustainable Urban Drainage Systems) is strongly supported, including maximising the use of above ground techniques to realise the potential for interception, infiltration and evaporation which reduce storage requirements. Greenfield sites such as this should be able to incorporate SuDS measures and avoid the need for underground storage requirements that offer no water quality benefit. An emphasis should be given to water quality considerations to ensure that the receiving water body is not adversely affected. There are also opportunities for amenity and wildlife benefits and these should be fully explored.

The Flood Risk and Asset Management Team would request that Bristol City Council is consulted on the discharge of any conditions imposed in relation to drainage due to the potential impact on areas at risk of flooding in Bristol.

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RETAIL IMPACT

A retail statement was submitted with the application by MWA to assess the retail impact of the proposed store on existing centres. The initial retail statement was flawed in a number of respects and a revised version was submitted in October 2014. The revised statement has been reviewed by DTZ acting on behalf of Bristol City Council, and DPDS Ltd acting on behalf of South Gloucestershire Council.

DTZ has focussed on whether the proposed development would be likely to have adverse retail impacts on Crow Lane District Centre and make the following comments:

The retail statement (including the revised submission) contains a number of weaknesses and the assumed trade diversions are considered to be unrealistic and significantly under-estimated in respect of Crow Lane (from the Co-Op), and over-estimated from out-of-centre foodstores at Cribbs Causeway. MWA assume that only about 3% of the proposed new foodstore's convenience goods sales would be diverted from the Co-Op at Crow Lane.

DTZ further comment that the MWA assessment fails to thoroughly assess the vitality and viability of Crow Lane District Centre, and the likely qualitative impacts on it, as the basis for interpreting the significance of forecast retail impacts.

A copy of the letter from DTZ is appended to this report.

DPDS comment that the conclusion of the MWA assessment that the greatest trade diversion to the proposed store would be from the Asda and Morrisons stores at Cribbs Causeway is correct, but agree with the comments made by DTZ that the trade draw from the Co-Op in Crow Lane is likely to be significantly larger than projected. DPDS estimate that the Co-Op would lose between 20% and 30% of its trade.

DPDS add that an impact on this scale would pose significant operational difficulties for the store. It would have to reduce labour costs and reduce the range of goods on offer to reduce wastage, particularly with regard to fresh and chilled foods. However, DPDS does not consider that the loss would lead to the closure of the store as it is generally better for convenience goods retailers to continue trading if they can since they would still be liable for rent. Large organisations, such as the Co-Op, can generally afford to do so.

In terms of the impact on the Crow Lane District Centre as a whole, the centre offers a mix of retailers and retail services and appears to be relatively healthy with low vacancy. DPDS comment that although the Co-Op is the largest unit in the centre and is well used, other shops will attract customers in their own right and the Co-Op should not be considered as an anchor. If (although unlikely) the store closes there is still a good level of retail interest in convenience stores and a relet should not be ruled out. DPDS thus conclude that the proposed store is not likely to cause significant harm to the Crow Lane centre. A copy of the DPDS letter is also appended to this report.

However, taking account of the criticisms of the retail statement prepared by MWA, together with the level of impact suggested by DPDS on Crow Lane, it is clear that the size of the store proposed would have a significant impact on Crow Lane District Centre. In planning a new local centre for the proposed development a food store should be provided of a scale that is proportionate to the role it would have in serving the new population. The fact that the new store would have a significant trade draw from the Crow Lane centre clearly suggests that the floorspace proposed for the new store is too great and should be reduced in size. It is recommended that an objection is made on this basis.

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TRANSPORT/HIGHWAYS

The Transport Development Management Team has commented as follows:

Background

The above application is submitted by Deeley Freed on the site known as 'Haw Wood' and proposes a mixed use development comprising 1,000 dwellings, a 36 bed care home, a mixed use local centre including a 2,000 sqm food retail outlet, a two form entry primary school and community facilities. The proposed layout also facilitates the potential delivery of a potential Henbury railway station to the south of the site. The site forms the westernmost parcel of land within the Cribbs Patchway New Neighbourhood (CPNN), the principle of which is approved through the adopted South Gloucestershire Council (SGC) Core Strategy and subsequent Supplementary Planning Document (SPD).

The CPNN comprises the areas broadly between the M5 and the A38 from west east and the land between the existing railway line and The Mall and Patchway Trading Estate to the north. Within this area, a total of 5,700 new homes are planned between 2016 and 2031 alongside strategic employment uses forecasted to deliver 9,000 jobs. This application is the second of two major outline applications that have been submitted to SGC, the first being the Fishpool Hill (Persimmon) proposal, which gained outline consent for 1,000 dwellings earlier this year.

Strategic Transport Issues

In order to understand the impact of the entire CPNN development upon the surrounding highway network, BCC officers have been working with counterparts at SGC to extrapolate and assess the outputs of the GBATS strategic modelling tool, which forecasts the expected level of peak hour traffic and routing associated with the CPNN development in its totality. It is only through this methodology that a comprehensive highway mitigation and accessibility package can be devised to support the planned growth.

At present, and in relation to the first two development proposals that have come forward, the primary focus so far has been to address the CPNN's impact upon the A4018 corridor and the areas of Henbury, Southmead and Westbury-on-Trym. The primary objective of this is to deliver viable and effective public transport services between CPNN and central Bristol whilst increasing the safety of pedestrians and cyclists in these areas and in so doing encouraging the use of sustainable modes of transport and reducing car-reliance. This is in the interests of air quality, road safety and public health. Highway officers' view is that without the above interventions being delivered from the outset, the CPNN will ultimately fail to address its impacts and result in an unsustainable development, contrary to local and national policy.

SGC concur with this view and to this end have established a specific transport tariff of £5,800 per dwelling unit to be collected from housing developments within the CPNN to deliver a package of transport improvements to support the impacts of housing and employment growth in this area. This is due to be ratified shortly through a landowners' agreement to be signed by the various ownership interests within CPNN.

It had been originally identified that the CPNN only delivered an improvement at the Crow Lane roundabout along with traffic management measures in the Bristol area. However, this scope has since increased to provide a movement corridor-based approach to tackling impacts along the A4018, the A38 and the B4056 and the areas between them in the light of the above modelling and following further negotiation between the highway authorities.

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A4018 - BCC Concerns and Requirements

It is anticipated that the initial phases of the CPNN development will commence alongside and access directly to the A4018 corridor. These phases will include the Fishpool Hill and Haw Wood developments which together total 2,100 residential units. BCC highway officers' chief concerns with this corridor and current outcomes are summarised below:

- o Network Management - where new signal junctions are formed on the A4018, it is imperative that, whilst in South Gloucestershire these junctions are fully co-ordinated in terms of their phasing and operation and where necessary are linked to an Urban Traffic Control (UTC) / SCOOT (Split Cycle Offset Optimisation Technique) network in order to better manage congestion and deliver public transport priority. BCC officers are seeking agreement with SGC to ensure that this is implemented as part of CPNN.
- o Bus corridor improvements - the CPNN development could accommodate a new population of up to 15,000 inhabitants alongside 9,000 new jobs. Whilst it is a laudable aim that a large number of these new residents may work within the identified employment allocation, this is by no means guaranteed and public transport linkage to other areas needs to be fast, efficient and resilient to congestion. It is noted that the western areas of the CPNN are quite remote from the route of the identified BRT MetroBus North Fringe-Hengrove Package (NFHP) and as such must either rely on future rail provision (subject to a separate process) or bus-based direct public transport routes, utilising the A4018 corridor to access central Bristol. Highway officers are therefore devising a scheme of bus-priority measures along the A4018 corridor in conjunction with our colleagues at SGC.
- o Localised impacts - the growth in traffic generated by the development is likely to cause problems on BCC's existing network if left unmitigated as traffic seeks to avoid congestion on the main arteries regardless of the interventions made on the A4018, for instance along Knole Lane, Pen Park Road and Greystoke Avenue, as well as within Henbury Village and Westbury Village. A package of traffic management measures will be required to address these impacts and a sum of £500,000 has been identified to address these matters although further work is required on this to confirm BCC's requirements.
- o Walking and cycling - the A4018 does not currently offer an attractive or convenient route for non-motorised forms of transport due to its nature in this location. Whilst a number of alternative quieter routes suitable for cycling will be delivered by the CPNN, namely along Fishpool Hill, Charlton Road and towards Station Road in Henbury, this needs to correlate with improved infrastructure within Bristol to improve facilities and address safety considerations as above.

CPNN contributions towards BCC infrastructure - A4018:

In response to the above concerns, the following transport interventions are being developed as part of CPNN and a £5m developer contribution to Bristol City Council has been agreed with SGC as part of the Haw Wood and Fishpool Hill developments. This contribution will form part of the s106 agreements associated each development:

A4018 / Crow Lane junction - convert current roundabout to signalised crossroads to incorporate bus priority and improved pedestrian / cycle crossing facilities.

Bus priority measures - Installation of bus priority measures to include bus lanes where appropriate, banned turns and adjusted signal configuration between Crow Lane and Westbury Road (subject to detailed design and modelling).

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A4018 / Charlton Road junction - provision of signalised junction to improve safety whilst delivering bus priority for services accessing CPNN via the A4018 and Charlton Road.

A4018 / Greystoke Avenue junction - Signalisation of the junction to include controlled crossings

Network Management & driver information - Extension of SCOOT / UTC network to the north to include new signalised junctions and a further link between the Crow Lane junction and the Fishpool Hill development; Installation of Variable Message Signage & CCTV monitoring along A4018 corridor to better manage network

Traffic Management - road safety improvements within the Westbury / Henbury / Brentry area to mitigate the impact of increased traffic within residential areas

Cycling / Walking - delivery of safe and viable cycle provision along Fishpool Hill and Charlton Road.

A38 & B4056 Gloucester Road & Southmead Road corridors, Southmead and Henleaze

Further requirements from BCC will be necessary to address matters occurring on other corridors as part of CPNN and this assessment work is taking place as part of the BAE planning application which was submitted in October of this year for a mixed-use development including up to 2,675 dwellings and 24ha of employment land.

Haw Wood - Individual Impacts

The originally submitted Transport Assessment (TA) used trip generation forecasts taken from the CPNN modelling reports. Whilst this methodology was supported by BCC officers, the submitted TA neglected to confirm the peak hour impact upon Bristol's highway network other than to provide forecasted directional flows in and out of Bristol.

Secondly, initial forecasts had assumed the complete removal of the existing bus-only lane into Station Road from the north, which has been objected to by BCC officers with regard to the negative impacts this would generate in Henbury, Lawrence Weston and Shirehampton. This has since been removed the CPNN package for the area, given that it would introduce an additional 500-600 southbound movements along Station Road in the morning peak hour and around 750 in the evening peak hour period.

Following BCC's highway officers' initial response to the application, more information was forthcoming and this is presented in the tables below. It should be noted that these figures consider the peak hour impact of only the Haw Wood development in isolation from the wider CPNN in order to provide an indication of its individual impact. A summary of the retail traffic generation is also included below

Haw Wood – Total Residential Traffic Peak Hour Trip Generation

Peak Hour Movements	Vehicles
AM arrivals	132
AM departures	358
PM arrivals	347
PM departures	210

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Haw Wood – Residential Traffic entering / departing Bristol

Peak Hour Movements	s/bound along Wyck Beck Rd (to Bristol)	n/bound along Wyck Beck Rd (from Bristol)	s/bound along Station Rd (to Henbury)	n/bound along Station Road (from Henbury)	TOTAL
AM arrivals		32		17	59
AM departures	126		0		126
Total AM peak vehicles generated on BCC's network:					185
PM Arrivals		101		46	147
PM Departures	111		0		111
Total PM peak vehicles forecasted on BCC's network:					258

Haw Wood – Proposed 2,024sqm Retail unit Traffic Generation

Peak Hour Movements	Vehicles
AM arrivals	30
AM departures	30
PM arrivals	115
PM departures	115

Of the trips highlighted above, it is common practice and reasonable to expect a certain percentage of these movements to occur from traffic which is already using the surrounding highway network (pass-by trips), whilst other movements may be drawn from traffic which would have normally visited an alternative supermarket (diverted trips). As a result a reduction of 60% from the above figures has been assumed and provides a reasonable estimate of the likely additional new traffic generated by the supermarket alone and highway officers are comfortable with this suggestion. This is subject to the effective operation of the proposed junction (below) serving the proposed store and the avoidance of any undesirable queuing back onto Bristol's highway network.

Access Proposals

The development proposes a total of four new accesses to the highway network which, whilst all within South Gloucestershire require consideration in terms of the highway impacts they will generate in Bristol.

Proposed Access to A4018 - CONDITION

Two new accesses are proposed to the west of the A4018 Cribbs Causeway. These are to be provided via signal-controlled junctions, one of which revises the existing three-arm junction with The Laurels to add an additional arm, the other proposing a further signal crossroads incorporating the existing priority-junction (left-in, left-out) Passage Road junction.

It is BCC's highways officers' strong recommendation to South Gloucestershire Council that these junctions are linked via a UTC / SCOOT mechanism to possibly also incorporate the further signal junction approved as part of the Fishpool Hill development and the signalised Crow Lane roundabout as referred to earlier. This is obligatory if the corridor is to function efficiently and deliver reliable public transport services whilst effectively managing congestion.

Without the above interventions the corridor stands very little chance of effectively managing the impacts of the CPNN, the consequence potentially resulting in a static queue between Crow Lane

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and the M5. A condition is therefore suggested by BCC to ensure that a UTC / SCOOT network is considered and implemented as part of the developer's off-site highway works.

Proposed Access to 'triangle site' - CONDITION

The development of the triangular area bounded by Wyck Beck Road, Station Road and the railway line is proposed to accommodate a mix of uses including a 2,024sqm foodstore. Again, this is located entirely within South Gloucestershire but has potential implications for Bristol's highway network given that it removes a current section of road between Wyck Beck Road and Station Road which will cause traffic to re-route around Henbury to reach properties and businesses to the south of the railway line.

To what extent and in what number such diversions will take place is not confirmed in the Transport Assessment although it is clear that this would affect motorists accessing properties along Tormarton Crescent and to the west of Station Road who are travelling from the north. It is noted that such traffic would, under the current arrangement, already have had to undertake a u-turn at Crow Lane roundabout and a substantial detour northbound along Wyck Beck Road before turning left towards Station Road along the current route. Nevertheless, these movements will be transferred to Crow Lane and Station Road from the south under the new arrangement and will require to be considered as part of the wider CPNN package which includes for traffic management interventions in the Henbury area, as referred to above. This is a valid concern and will necessitate further investigation.

In order to enable access to the triangle site, a new roundabout access is proposed to the west from Station Road whilst a left-in, left-out access is proposed to the east via Wyck Beck Road. This arrangement can only be facilitated by the relocation of the existing 200m bus-only lane further south of the new roundabout.

Whilst the principle of this will retain the bus-only access to Henbury from the north and in fact lengthen the bus only restriction by a further 100m (as far as Tormarton Crescent) the execution of the works will require detailed liaison with Bristol City Council who must be comfortable that the correct physical enforcement and monitoring measures are adopted so as not to deplete the effectiveness of this facility. BCC will not accept any abuse of the revised bus-only route and must be content with the final agreed scheme and a condition is required to ensure such discussions take place which fulfils the access requirements of neighbouring properties whilst avoiding southbound through traffic.

Suggested Henbury Railway Station

BCC highway officers note that the masterplan facilitates the delivery of a new Henbury rail station to the south of the triangle site, should this come forward as the preferred option for delivering a station as part of the MetroWest proposals (another option is being considered to the east of Wyck Beck Road and is incorporated into the Persimmon masterplan). The submitted proposals show a station forecourt layout providing a bus stop and 27 car parking spaces. Whilst the delivery of a station at Henbury is supported in principle, BCC officers have two major concerns with the submitted layout and these have been raised with SGC officers in respect of this application:

- 1) Given the relatively low levels of parking, how SGC intend to address the potential for overspill parking occurring as a result of demand for use of the station by motorists accessing rail links from both directions.
- 2) Whether or not pedestrian access to the south of the station has been considered by SGC, particularly in view of the current industrial / storage uses to the south of the railway line (but which are located within South Gloucestershire) which would appear to form a boundary to movement from the south. An indicative arrow is shown in the masterplan across the railway

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track but this would appear to be fairly meaningless as it ends up in the current storage / industrial yard. Further information is required on this.

Pedestrians / Cycle linkage to the south - CONDITION

The site has the opportunity and its scale will be required to provide high quality connections with the NCN (National Cycle Network) Route 4, which provides a segregated route alongside Station Road in Henbury, crossing Crow Lane and continuing south towards Westbury-on-Trym and central Bristol, also providing access to leisure routes through the Blaise Castle / Coombe Dingle Estates.

Whilst located largely within the SGC area, BCC highway officers recommend a condition for the developer to deliver an improved high quality off-road cycle route alongside Station Road between the Haw Wood site and Henbury.

The current route utilises a narrow footway which provides a poor level of safety and protection from oncoming traffic, whilst remaining inadequate for pedestrian / cycle use. This will fail to adequately serve the Haw Wood residential site and also fail to provide safe and suitable access to the proposed supermarket and community uses for employees and visitors from each direction.

Construction Management - CONDITION

The proposed development is likely to be subject to a phasing plan and with this a Construction and Environmental Management Plan will be expected to be submitted prior to construction, as a minimum to be agreed between both South Gloucestershire and Bristol City Council. BCC's chief concern with this relates to avoiding any impact of construction traffic upon the area of Henbury, although other issues such as noise, mud on the highway and hours of construction will also need to be taken into account.

BCC Highway Officers therefore recommend approval, subject to the obligations / conditions below being referred to South Gloucestershire Council for inclusion within any planning approval:

Obligations

- 1) A financial contribution (proportionate to the agreed £5m sum for Fishpool Hill and Haw Wood) to Bristol City Council for the delivery of improved public transport, walking, cycling and traffic management measures along the A4018 and within the areas of Henbury, Brenchley and Westbury-on-Trym.

Conditions

- 1) The submission and agreement of a Construction & Environmental Management Plan to be agreed in writing with Bristol City Council.
- 2) The implementation of a scheme of Network Management measures delivered as part of the access works to provide a UTC / SCOOT network along the A4018 in correlation with further similar measures associated with the Fishpool Hill development and the A4018 improved bus corridor to be agreed in writing with Bristol City Council.

The agreed scheme shall be implemented upon first occupation of any uses accessed from the A4018 Cribbs Causeway.

- 3) The design and submission of an effective control and enforcement mechanism to ensure the integrity of the relocated bus-only southbound lane along Station Road to be agreed in writing with Bristol City Council.

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The agreed scheme shall be implemented upon first occupation of any uses proposed within the 'triangle area', or at such point as the bus-only lane is relocated, whichever is sooner.

- 4) The design and submission of a cycle scheme between the development and Station Road in Henbury to provide safe and segregated access for pedestrians and cyclists between the residential and retail elements of the development, the NCN Cycle Route and the Henbury area to be agreed in writing with Bristol City Council.

The agreed scheme shall be implemented and available for use either upon first occupation of any uses within the 'triangle area', or occupation of the first residential units, whichever is sooner.

- 5) Approval of road works necessary - where roadworks are undertaken on BCC's highway network these works will need to be agreed in writing with BCC to include a bond (surety) and any approval and inspection fees, as appropriate.

RECOMMENDATION

It is recommended that the Committee:

A. Objects to the proposals on the grounds that the proposed food store is too large for its purpose to serve the new development and would lead to a significant trade draw from the Co-Op store within Crow Lane (Henbury) Centre. This would cause serious harm to the vitality and viability of the Centre.

B. Advise South Gloucestershire Council that, notwithstanding its objection outlined above, should South Gloucestershire Council be minded to approve the development, the following should be included within any planning approval:

Obligations:

- i) A financial obligation (proportionate to the agreed £5m sum for Fishpool Hill and Haw Wood) to Bristol City Council for the delivery of improved public transport, walking, cycling and traffic management measures along the A4018 and within the areas of Henbury, Brentry and Westbury-on-Trym.

Conditions:

- 1) The submission and agreement of a Construction & Environmental Management Plan to be agreed in writing with South Gloucestershire Council.
- 2) The implementation of a scheme of Network Management measures delivered as part of the access works to provide a UTC / SCOOT network along the A4018 in correlation with further similar measures associated with the Fishpool Hill development and the A4018 improved bus corridor to be agreed in writing with South Gloucestershire Council.

The agreed scheme shall be implemented upon first occupation of any uses accessed from the A4018 Cribbs Causeway.

- 3) The design and submission of an effective control and enforcement mechanism to ensure the integrity of the relocated bus-only southbound lane along Station Road to be agreed in writing with South Gloucestershire Council.

The agreed scheme shall be implemented upon first occupation of any uses proposed within the 'triangle area', or at such point as the bus-only lane is relocated, whichever is sooner.

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4)The design and submission of a cycle scheme between the development and Station Road in Henbury to provide safe and segregated access for pedestrians and cyclists between the residential and retail elements of the development, the NCN Cycle Route and the Henbury area to be agreed in writing with South Gloucestershire Council.

The agreed scheme shall be implemented and available for use either upon first occupation of any uses within the 'triangle area', or occupation of the first residential units, whichever is sooner.

Bristol City Council requests that it is consulted in considering any details submitted in connection with the discharge of Conditions 1 - 4 above.

The applicant should also be made aware that where roadworks are undertaken on BCC's highway network these works will need to be agreed in writing with Bristol City Council to include a bond (surety) and any approval and inspection fees, as appropriate.

C. Advise South Gloucestershire Council that Bristol City Council requests that it is consulted in connection with the discharge of any conditions imposed in relation to drainage.

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20 November 2014

Dear Paul

PROPOSED NEW NEIGHBOURHOOD LOCAL CENTRE, NEAR CRIBBS CAUSEWAY, SOUTH GLOUCESTERSHIRE
RETAIL PLANNING ADVICE

Thank you for your instructions to advise Bristol City Council on the retail planning issues associated with the proposed mixed use development, including new foodstore¹ up to 2,000 sq m gross, near Cribbs Causeway. The application for outline planning permission (ref. PT14/0565/O) has been validated by South Gloucestershire Council, and our advice will inform your consultation response to it.

We have now completed our review of the 'Supporting Retail Statement' (dated February 2014) – and 'Supplementary Retail Statement' (dated September 2014) – prepared and submitted to South Gloucestershire Council by MWA, and set out our findings and conclusions in this letter.

As instructed, we have focused on whether proposed development would be likely to have adverse retail impacts on centres within Bristol – namely Crow Lane (Henbury) District Centre. Accordingly, we have assessed the veracity of MWA's data inputs and assumptions, and the realism and robustness of their conclusions on retail impacts. We also consider MWA's application of the sequential approach in terms of whether this has been properly carried out in the context of the NPPF and recent Court cases.

Where we have not commented on aspects of MWA's assessment, it cannot necessarily be taken to mean that we agree with them.

Retail Impact Assessment

MWA's initial (February 2014) quantitative retail impact assessment is included at Appendix 7 (Tables 1 to 9) of their Supporting Retail Statement, and their explanations and conclusions in this respect are provided at Section 6.

¹ According to MWA's Supporting Retail Statement, there is currently no named operator for the foodstore; however, it is acknowledged that one of the "five larger foodstore operators (Asda, Morrison's, Sainsbury's, Tesco and Waitrose)" would be likely to anchor the proposed development.

MWA's initial assessment includes a number of significant flaws and weaknesses, which mean that their analysis of and conclusions on retail impacts are unreliable and not a sound basis on which to determine the planning application. It does not comprise a complete and proper step-by-step modelled approach to impact testing, and is deficient in terms of data inputs and assumptions.

Following comments from South Gloucestershire Council's independent retail planning consultants, MWA undertook a revised (September 2014) quantitative retail impact assessment. This is included at Appendix 7 of their Supplementary Retail Statement, and their explanations and conclusions in this respect are provided at Section 4.

We summarise below the weaknesses in MWA's revised quantitative retail impact assessment.

1. MWA adopt 2012 as the base year for impact testing. This is incorrect. The retail impact assessment was completed in September 2014 and therefore the base year should be 2013 (i.e. the year preceding that in which the assessment was prepared). This serves to over-state the growth in total available convenience goods expenditure within the adopted Catchment Area, to support the proposed new foodstore, between the base and design years.
2. MWA's Tables 5 and 6, which estimate convenience goods expenditure at the base year and forecast such expenditure to the design year (and beyond), make no deductions for Special Forms of Trading (SFT) including convenience goods sales accounted for by internet shopping. This serves to over-state total available convenience goods expenditure within the adopted Catchment Area. We acknowledge that MWA do make deductions for SFT in their subsequent tables.
3. MWA's assessment is informed by household survey data on shopping patterns derived from a number of retail studies and retail impact assessments (as listed under paragraph 1.6 of Appendix 7). This is acceptable in principle. However, we note that MWA's estimates of convenience goods expenditure by postcode sectors (i.e. MWA's adopted Catchment Area zones) in Tables 5 and 6 are not fully compatible with the postcode sectors that make up the Catchment Area zones adopted by other consultants in undertaking retail studies and retail impact assessments, upon which MWA rely as the basis for household survey data on shopping patterns. In the absence of household survey data compatible with MWA's adopted Catchment Area zones, MWA should – but fail to – thoroughly justify and be transparent their adjustments to shopping patterns in Table 8. Further, the household survey data used by MWA was collated at different times (February 2010, July 2011 and May 2012 respectively) and is therefore not like-for-like data on which to estimate retail sales in existing stores and centres and, in turn, forecast retail impacts.
4. MWA's assessment fails to consider the baseline position at the design year (i.e. forecast sales at that date in the absence of any commitments and the proposed new foodstore), which would necessarily establish total available convenience goods expenditure and spending patterns in the Catchment Area in 2019 based on up-to-date expenditure growth forecasts. This shortfall in MWA's assessment means that pre-impact retail sales at the design year have not been properly considered and, consequently, the likely retail impacts of the proposed new foodstore on existing stores and centres have not been thoroughly tested.
5. Importantly, MWA's assessment fails to estimate the benchmark turnover (based on average sales densities) of existing stores and centres in the adopted Catchment Area. This is necessary to measure the survey-derived turnover of existing stores and centres relative to their benchmark turnover, which would indicate whether they are under or over trading; and thus indicate the level of capacity (or otherwise) to support new retail floorspace.
6. MWA's assumed sales density for the proposed new foodstore's convenience goods floorspace (£12,500 per sq m net in 2010 prices) – as set out in their Supporting Retail Statement and maintained in their Supplementary Retail Statement – is, in our view, slightly high for a foodstore of this scale and nature. *Ceteris paribus*, this serves to over-state retail impacts. In regards to the 2010 price base adopted for the proposed new foodstore, we note that this is inconsistent with the 2012 price base adopted by MWA in their revised quantitative retail impact assessment.
7. With regards to MWA's assumed trade diversions, we consider these to be unrealistic in that MWA under-estimate potential trade diversion from Crow Lane District Centre (namely the Co-Op) –

which is afforded the highest priority of protection by the ‘town centres first’ policy – and over-estimates potential trade diversion from out-of-centre foodstores and food/non-food superstores, including but not limited to the Asda Wal-Mart at Cribbs Causeway.

- MWA assume that only about 3% of the proposed new foodstore’s convenience goods sales (amounting to £0.38m) would be diverted from the Co-Op at Crow Lane District Centre. This is unrealistic considering the proximity of Crow Lane District Centre to the proposed development; the foodstore element of which is situated at the southern edge of the application site and is therefore closer to the District Centre than are the existing foodstores at Cribbs Causeway² (from which MWA assume the proposed new foodstore would attract more than £7m of convenience goods sales i.e. over half of its assumed turnover of £13.39m). By further contrast, MWA assume that £1.12m would be diverted from the Aldi at Henbury to the proposed new foodstore. These out-of-centre foodstores (at Cribbs Causeway and Henbury) are afforded no protection by the ‘town centres first’ policy.
 - Further the Co-Op at Crow Lane District Centre has a substantial walk-in catchment, which is likely to account for a substantial proportion of its existing turnover. The proposed new foodstore (if permitted and implemented) would be situated less than 500m from the Co-Op, and is therefore very likely to overlap with and share this walk-in catchment. Accordingly, we consider that MWA’s assessment under-estimates the likely retail impacts of the proposed new foodstore on the Co-Op at Crow Lane District Centre.
 - As well as issues of proximity and accessibility, the scale of the proposed new foodstore – and existing foodstores with which it is likely to compete – is a relevant consideration when assessing the extent of trade diversions. The proposed new foodstore would be 1,400 sq m net. Whilst the Co-Op at Crow Lane District Centre (628 sq m net) is less than half the scale of the proposed new foodstore, this is more comparable than the existing food/non-food superstores at Cribbs Causeway (for example, Asda Wal-Mart is 8,910 sq m net and Morrisons is 3,353 sq m net based on information from IGD, both of which are full sized, full range superstores). Therefore it is our view that the proposed new foodstore would compete with the Co-Op at Crow Lane District Centre to a greater degree than assumed by MWA, because the scale and convenience-based nature of these neighbourhood foodstores would be similar – and, in our view, share the same walk-in catchment as described above.
 - On this basis, we consider MWA’s assumed trade diversions to be unrealistic in respect of Crow Lane District Centre.
8. MWA’s assessment in Table 12 should – but fails to – show how much of the turnover of existing stores and centres is forecast to be diverted to the proposed new foodstore as a proportion (i.e. the percentage impact).
9. In considering the retail impacts of the proposed new foodstore on Crow Lane District Centre (and other designated centres), regard should be had for its commercial health and the consequences of forecast retail impacts on its vitality and viability. For instance, no regard is had by MWA for the consequences of assumed trade diversion from the Co-Op on linked trips in the District Centre. MWA, in our view, fail to undertake a thorough such assessment of Crow Lane District Centre and a number of other designated centres in the Catchment Area, as the basis for interpreting the significance of forecast retail impacts (i.e. ability to withstand the forecast retail impacts). Section 6 of the Supporting Retail Statement provides an overview of existing foodstores and other convenience goods provision in the designated centres; however such analysis is inadequate (and is not addressed in MWA’s Supplementary Retail Statement). It is very much limited to the ‘here and now’ and, importantly, lacks detailed analysis of the likely qualitative impacts of the proposed new foodstore on existing provision and other key indicators of vitality and viability, such as levels of shop vacancy. Such conclusions are necessary to make an informed judgement on the likely qualitative impacts of the proposed new foodstore. The effects of the proposed development have not therefore been properly considered by MWA.
10. MWA’s assessment does not properly consider the retail impacts of the proposed new foodstore’s comparison goods floorspace (measuring 210 sq m net). To ensure a thorough and robust

² Including Asda Wal-Mart, Morrison’s and M&S.

assessment of retail impacts, such floorspace should be considered in the context of the proposed development in its entirety. However we accept that because of the small scale of the comparison goods floorspace in the proposed new foodstore, and the forecast more rapid growth of comparison goods expenditure than convenience goods expenditure, the impacts on comparison goods sales in existing centres would be very much smaller than the convenience goods impacts.

In the light of the above, there remain some weaknesses in MWA's revised quantitative retail impact assessment. Some, but not all, of these weaknesses serve to under-state the likely retail impacts of the proposed new foodstore.

Importantly, MWA's assessment fails to thoroughly assess the vitality and viability of Crow Lane District Centre, and the likely qualitative impacts on it, as the basis for interpreting the significance of forecast retail impacts. We would advise Bristol City Council to request that this weakness – and the other weaknesses identified above – is addressed by MWA before South Gloucestershire Council determine the planning application. Only then can realistic and informed judgements be made as to what the forecast retail impacts mean for Crow Lane District Centre, and whether the proposed new foodstore is likely to threaten the vitality and viability of the District Centre and have a significant adverse impact on it.

Sequential Assessment

The application site is out-of-centre in NPPF terms. Paragraph 24 of the NPPF states that:

“Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.”

To meet the terms of the sequential test, alternative sites should be available, suitable and viable. To clarify, we have not assessed the availability, suitability and viability of alternative sites considered (or not considered) by MWA; however, we have had regard for MWA's sequential assessment and the application of such.

We consider the scope of MWA's sequential assessment to be reasonable. It considers alternative sites in and on the edge of Crow Lane District Centre, none of which MWA conclude is capable (i.e. available, suitable and viable) of accommodating the proposed new foodstore.

We acknowledge that MWA, in their revised sequential assessment (Section 3 and Appendix 1 of the Supplementary Retail Statement) demonstrate a degree of flexibility on the part of the applicant in the consideration of alternative, sequentially-preferable sites. This flexibility – as described at paragraphs 3.4 and 3.5 of MWA's Supplementary Retail Statement – includes a reduced minimum scale of 1,500 sq m gross and, in our view, is adequate.

In addition, we acknowledge that the new foodstore element of the proposal – which also includes up to 1,000 new dwellings – will comprise a new Neighbourhood Local Centre to serve a new strategic housing area, as provided for in South Gloucestershire Council's adopted Core Strategy. In this context, and assuming South Gloucestershire Council is satisfied that the proposal accords with the sequential test undertaken at the Core Strategy plan-making stage, it is a fair assessment that no other sequentially-preferable site would be suitable for the proposed new foodstore (as it would not be capable of meeting the need identified by the proposal).

Conclusions

We summarise below our conclusions and recommendations.

Retail Impact Assessment

- We have identified a number of weaknesses in MWA's assessment of the likely retail impacts of the proposed new foodstore.
- It is our view that MWA's assessment under-estimates trade diversion from and thus the likely retail impacts on Crow Lane District Centre (which is afforded the highest priority of protection by the 'town centres first' policy) and over-estimates potential trade diversion from out-of-centre foodstores and food/non-food superstores (which are afforded no such protection).
- The assessment fails to have proper regard for the commercial health of Crow Lane District Centre (and other designated centres) and, in turn, consider the consequences of forecast retail impacts on its vitality and viability.
- Bristol City Council should request that the weaknesses in MWA's retail impact assessment are addressed before final judgements are made on the likely retail impacts and the consequences of such.

Sequential Assessment

- We accept that no other site would be suitable for the proposed new foodstore – as no other site would be capable of meeting the need identified by the proposal insofar as supporting a new Neighbourhood Local Centre serving a new strategic housing area.
- Bristol City Council should, however, seek comfort from South Gloucestershire Council as to whether they are satisfied that the proposal accords with the sequential test undertaken at the Core Strategy plan-making stage.

I trust that this letter meets the Council's needs, however please do contact me should you require any clarification or further information.

Yours sincerely,

Chris Watts

Senior Consultant – Development Consultancy

For and on behalf of DTZ

Swindon

DAM/dm/NB

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16th Oct 2014

Helen Ainsley
South Gloucestershire Council

Dear Helen

PT14/0565/O Land at Cribbs Causeway - Retail Impact Assessment

I refer to your request for further retail planning advice on this application.

To recap, the application is for outline planning permission for the mixed use development to the west of Filton airfield. The development comprises 1000 dwellings, an extra care home, local centre with a food store of up to 2000 sq m gross floor area, primary school, and other community facilities. The retail element of the proposal is a local centre which includes a 2000 sq m gross (1,400 sq. m. net) foodstore supplemented with a range of Class A1-A3-A5 units. The application was accompanied by a supporting retail statement prepared by MWA and dated February 2014. Following our earlier comments (19th June 2014), MWA has submitted a supplementary retail statement dated September 2014.

The proposed local centre site is shown on the southern edge of the site in the triangle of land between Station Road and Wyck Beck Rd. It is separated from the main area of housing proposed by the playing fields of the Rugby Club. However, it may be better located in relation to the overall development area identified in the Core Strategy.

Planning Policy

I set out a summary of the relevant planning policy in my earlier letter. I concluded that the proposed local centre was not in accordance with an up-to-date development plan primarily because its intended scale took it outside of the definition of a local centre in the Core Strategy. It was therefore subject to the sequential and impact tests.

The Sequential Test

I concluded that there was a shortage of information presented on the alternative opportunities in the centres and the lack of mapping made it difficult to assess the information that was provided. I also concluded that a number of the centres considered could be ruled out because the proposal would not be in keeping with their role and function or they were too peripheral to the catchment area the proposal would establish.

However, I concluded that substantially more information is required on the following centres before the sequential test could be said to have been passed.

The planned Patchway District Centre including the proposals for a foodstore to the east of Highwood Rd.
Southmead – both centres
Crow Lane
Westbury on Trym
Cribbs/Patchway New Neighbourhood with regards to the Central Airfield local centre.

Appendix 1 of the supplementary report provides further details on Crow Lane, Westbury and the two Southmead centres. In relation to the centres I conclude

Crow Lane – that open space and car park are important assets and unlikely to be available and that there are no other potential sites in or on the edge of the centre.

Westbury on Trym – It is not entirely clear what land MWA are referring to at the junction of Westbury Hill and Falcondale Road but it would not be a sequentially preferable site. There was a proposal some years ago for a foodstore on land the rear of the car park, but this did not progress and I do not consider that it is either suitable or likely to be available. The only other potential site would be the post office/sorting office. There has been no indication that the sorting office is due to close and the site would not accommodate a foodstore of significant size. I conclude that there are no suitable or available sites for a supermarket in Westbury

Southmead - Arneside Rd – I agree that that further development on the edge of centre is constrained by open space and existing uses including residential development. The only possible site appears to be the Community Centre and Southmead House. There is no indication that either or both of these sites are likely to become available. Both are important community assets and Southmead House is relatively new. I conclude that there are no available sites.

Southmead – Local Centre – MWA considers four possible sites. They are all in industrial use and would appear to require the active relocation of the existing companies. All four are rejected as being too small. Johnson Apparelmaster is a free standing site and can be ruled out on this basis. The other three sites form part of a larger industrial area, which also includes a Travis Perkins site to the rear. While a larger site could be formed from these sites, it would appear not to be straightforward. Leaving aside land ownership issues, and with the need to acquire a substantial number of businesses in active use there are a number of residential properties which might also need to be acquired to consolidate the site. It is unlikely that a consolidated site could be considered as available. I conclude that there are no available sites in or on the edge of the centre.

The Rodway Road District Centre

The Rodway Rd centre is identified in the Supporting Retail Statement as within the catchment area of the proposed store and I concluded in my earlier response that the information submitted was not sufficient. Specifically, it had not identified the proposal for a foodstore on the southern side of Highwood Rd as part of the Charlton Hayes development. The Supplementary Statement reviews the likely catchment area of the

proposal and limits the area of search to post codes BS10.6 and BS10.7 as the area from which the proposal would draw most of its trade (although the impact assessment is based on a wider catchment area). MWA therefore now excludes the centre from the area of search. I will consider the catchment area in relation to the impact assessment in due course, but I do accept that the Rodway Road District Centre would, at most, be on the very edge of the proposed stores catchment area, would not serve substantially the same catchment area and should be omitted from the search for sequentially preferable sites. .

The Central Airfield Centre

MWA suggests that the scale of retail development in the Central Airfield Local Centre is not intended to provide a scale of convenience food shopping in excess of that planned at Haw Wood. A planning application is expected soon and the indications are that the proposal will be larger than this proposal. It will however, be designed to serve the population of some additional 2,600 houses within the Filton/Patchway area and is not intended to replace the proposed Haw Wood local centre. The Central Airfield centre cannot be an alternative in these circumstances.

I therefore conclude that the applicant has now met the sequential test.

Retail Impact

MWA has submitted a revised impact assessment. This has redefined the proposal's catchment area, and re-based the basic population and expenditure data on current data. The assessment calculations are set out in Appendix C of Appendix 7 to the Supplementary report and all references to table numbers refer to these tables unless otherwise stated.

The Catchment Area

The catchment area is defined as post code areas and is shown on a plan as Appendix B of Appendix 7 of the Supplementary Statement. It appears reasonable and I agree specifically that the catchment area would be curtailed in the east by existing stores. To the west, the suggested catchment area is more extensive but the foodstore provision is limited in this area. Although it might be questioned whether people from zone 3 (BS35.5) would drive past the foodstores at Cribbs Causeway, the population of this zone is very small and will not greatly influence any conclusions on impact whatever assumptions are made about them. The two southern zones (zones 4 and 5) are nearer to alternative foodstores and as far as can be judged from the earlier impact assessments (Appendix A of the MWA Supplementary Statement), the Cribbs Causeway foodstores have a relatively limited market share in this area. It is generally better to start with an extensive catchment and I regard MWAs as an appropriate starting point. I will examine the trade draw assumed from these two zones in more detail in assessing the trade draw and trade diversion.

Design Year

MWA have adopted a design year of 2019. While this would normally be regarded as too far into the future, the related housing will not be completed until about then and the store could not be expected to have achieved its full turnover until then. It would be possible to work to a shorter timescale and a lower turnover, but it is more helpful to assess the proposal in the context of the housing provision and I accept the design year of 2019 in this case.

Local Population Estimates and Forecasts

The population estimates are from a recognised source. The population forecasts for the zones are from the same source and are controlled to ONS population projections at district level. MWA make an adjustment to these to take account of the house building in the area. This raises a difficult question because the Core Strategy housing provision is calculated to accommodate the ONS population forecasts and the residents of the new housing will not be additional to that. There is in the unadjusted population forecasts an allowance for population growth in the zones. Zones 1 and 2 are both forecast to show substantial population growth between 2011 and 2020 (970 and 766 people respectively) which would not be possible without additional house building in the area. There is therefore an element of double counting in the adjustment MWA makes.

The adjustment made is based on figures 2.38 persons per household in zone 1 (pph) and 2.42 pph in zone 2. The figures have been taken as the existing household size in the area. However, people moving into the new housing will not be typical of residents in South Gloucestershire. The development is likely to attract a relatively young population and the average household size is likely to turn out to be above the national average, certainly within a few years of family building. In my view the average household size could be higher and will to some extent off-set the overestimation of the population resulting from the housing adjustment.

There is inevitably some uncertainty about the population projections and, on balance, I conclude that MWA's are probably a little too high. However, this represents a small proportion of the catchment area population and it will be of very limited significance in the conclusions on impact.

Local Expenditure per Head

The base year figures have been obtained from Experian – a recognised provider. The forecasts for the design year are based on Experian forecasts and are as generally used. The figures include expenditure through special forms of retailing (principally internet shopping). This is deducted at a later stage – for 2012 as part of the market shares (considered later) and, for 2019, according to Experian's forecast for SFT taking account of internet sales through stores.

Since the supplement was submitted Experian has published revised forecasts (Retail Planner Briefing Note 12.1 – Oct 2014). The forecast growth in convenience spending to 2019 is slightly lower, but SFT (adjusted for instore sales) is forecast to be 3.8% in 2019 compared with 4% in the earlier forecasts. Convenience expenditure per head is forecast to be 2.3% lower under the new forecasts than the previous forecast rates.

Local Expenditure

The local expenditure available to stores as shown in Table 6 is the product of the population and expenditure forecasts. Given less growth in the available expenditure per head now expected, the convenience goods expenditure in the catchment area will be about 2% less and there will be an element of underestimation in the impact calculations.

Existing Shopping Patterns

MWA has not undertaken a new household survey but relied on previous surveys carried out for the South Gloucester Retail Study 2009 by Roger Tym, the retail impact study for the Asda at Abbeywood Retail Park by RPS and Sainsbury's proposal at Horfield by WYG. This creates considerable difficulties in trying to piece together the results of three different surveys with different zones and relating them to a further set of different zones used by MWA. The survey results are set out in tables 7a and 7b.

The approximations of the survey zones to MWA's zones are shown in Table 7c. Based on the expenditure calculations in Table 6 and the market shares in Table 7c, the turnover of the existing stores drawn from the catchment area are shown in the right hand side of the table. In Table 8 MWA adjusts these calculations for "differences in the catchment area" between the household survey zones used and the MWA zones. This involves halving the market shares of existing stores in Zones 4-6, for which the results from WYG Zone 6 have been used. WYG Zone 6 is an extensive area covering much of the MWA catchment area, including Westbury, Shirehampton, and Brentley. Although the adjustment is identified in para 1.13 of Appendix 7, there is no explanation of why the adjustment simply reduces the market share by about 50%.

A further adjustment is made specifically to the turnover of the Co-op at Crow Lane. MWA comments that

"the surveys appear to underestimate the store's market share, if the store was trading at or close to benchmark prior to the Aldi opening (Turley SRA). Market shares have therefore been adjusted accordingly;"

It is common for the turnover of smaller stores to be underestimated in this way and it is reasonable to work on the basis that the shop is trading somewhere near the Co-op average sales density. Elsewhere in the report the net sales floorspace is given a 628 sq m. The turnover is estimated at £3.81m implying that the sales density used to estimate the turnover was £6067/sq m. This is a reasonable average sales density for the Co-op Group.

Table 9 takes the opening of the Aldi on Crow Lane into account. This is done by attributing market shares of 10% of the available convenience expenditure in Zones 1 and 2, and significantly less in the other zones. This gives it an estimated turnover of £4.79m. The market shares of other stores are adjusted downwards accordingly, but there is no explanation of how. The market shares for three stores are adjusted – the Asda and Morrisons at Cribbs Causeway and the Co-op on Crow Lane. The trade diversion from the Co-op is estimated at about £0.37m which is about 10% of its pre-Aldi turnover as estimated by MWA. Half of the impact is felt on "Other Stores" the market share of which drops from 31.4% to 26.2%. This is disproportionate to their market share and is not clear why that should be so.

No account is taken of the impact of the opening of the Asda store at Abbeywood in MWA's exercise. No explanation is offered as to why not. It will become apparent that the centres which attention should focus on in terms of impact are Crow Lane and Westbury on Trym and it is, unlikely that the Asda at Abbeywood would have had a significant impact on these centres.

The 2012 figures are rolled forward to 2019 in Table 10. This is on the basis of existing market shares except that an increase in SFT is made. This leads to further reductions in the market shares of the Asda and Morrisons stores at Cribbs Causeway, the Tesco at

Bradley Stoke, the Sainsbury at Stoke Gifford and “Other Stores”, but not to the market shares of the Co-op and Aldi at Crow Lane. It is, however, unlikely that the existing stores would benefit from the increased population in the area in this uniform way if this retail proposal did not come forward. Most of the additional expenditure would focus on the other local centres, and the main foodstores.

Overall, I have indicated that there are questions on a number of the calculations made in Tables 7 to 10 and a need for more explanation. It does have to be kept in mind that many of the adjustments are small and that retail impact assessment is not a precise process. The food market is dominated by large, out-of-centre stores and the proposal’s impact must be expected to fall on these, but a number of the questions arise in relation to Crow Lane – the existing turnover of the Co-op and the impact of the Aldi in particular – and the disproportionate impact estimated on other, non specified stores. I will assess the significance of these concerns in due course.

The Turnover of the Proposal

The turnover of the proposed store derived from convenience goods is £14.88m (Table 11 of Appendix C to App 7 of the Supplementary Report. This is derived from the earlier retail impact assessment and the figure was considered robust. About 90% is assumed to be drawn from the catchment area – the rest coming from passing trade. This was again accepted as reasonable. The proposal would also have a comparison goods turnover - of £1.68m according to MWA.

Trade Draw

Table 11 also sets out the forecast of where the proposals trade will be drawn from in relation to zones MWA is now using, and the market share in each zone implied by those figures. 62% of the trade would be drawn from Zones 1 and 2 (the Brentry/Southmead areas and Henbury respectively), and 18% from the Zones 4 and 5 (Westbury and Shirehampton area). The trade draw from areas north of the motorway (Zones 3 and 6) is estimated at about 10%.

The market shares range from just over 20% in Zones 1 and 2, to about 8% in the Westbury and Shirehampton areas, and slightly less in the Hallen area. These market shares appear reasonable in the context of a major grocery chain and should be remembered that if the proposal does not succeed in attracting those market shares, its turnover would be lower and the impact correspondingly less. The figure in zone 3 (East Compton) is about 16%. Unless the proposed store is a discounter or high quality store, this appears high given the fact that the foodstores in Cribbs Causeway would be nearer, but the sum estimated from this zone is only £0.3m and will not affect the overall conclusions of the impact assessment.

Although direct comparisons are difficult because of the difference in the boundaries of the zones and the retail developments since surveys were undertaken (particularly the Asda at Abbeywood and the Aldi on Crow Lane), these estimates are reasonable in the context of the evidence available from the other studies cited.

The Convenience Trade Diversion and Impact

The impact of the application proposal is calculated in Table 12. The market share of the proposal is inserted in the table at the top and the market share of the existing stores is adjusted downwards.

Examining the adjustments in Zone 1, the market shares of the Asda and Morrisons at Cribbs Causeway are estimated to drop by 7% each from 21% each to 14% each, a 33% decline in market share in this zone. The Sainsbury at Stoke Gifford market share is estimated to drop by 1.2% from 5.2% to 4% which is a 23% decline in market share. "Other Stores" are forecast to lose 2.4% market share. The pattern of adjustment is broadly similar in Zone 2. The adjustments are much smaller in zones 3 – 6 because the market share of the proposal in these zones is estimated to be much smaller.

There is no explanation of how the market shares have been adjusted or the factors taken into account in doing so.

The total turnover lost to the new proposal is summed in the last column of the right hand table (Table 12). For instance, the Asda at Cribbs Causeway is estimated to lose £4.75m of turnover and the Morrisons £2.34m. The trade diversion from the Co-op in the Crow Lane centre is estimated at £0.38m. MWA does not calculate the trade diversions as a percentage of the stores' 2019 turnover. There is a difficulty in doing so because the turnover of the stores listed is only that derived from proposals catchment area. In most cases, this is only a limited part of the total turnover and the turnover of the stores is much greater than indicated in the tables.

However, the turnover of the Co-op and Aldi stores on Crow Lane must be largely "complete" in that only a small proportion of the turnover would be drawn from outside the proposal's catchment area. The Co-op's turnover in 2019 is estimated at £3.94m and the trade diversion would be about 10%. The Aldi's turnover is estimated at £5.81m and the trade diversion of £1.12m would be about 20% of this. I am not convinced that trade diversion from the Aldi would be greater than from the Co-op (£1.12m compared with £0.38m), or at least so much greater. Aldi has developed a specialised offer which competes strongly against the main supermarkets chains. The Co-op is a more like ofr like competitor..

Comparison Goods Impact

The comparison goods turnover of the proposed store is estimated at £1.68m. The application includes a number of A1 - A5 uses but any comparison goods sales from these units will be small and can be ignored for retail impact assessment purposes.

MWA commented that, because of the growth in comparison goods spending identified in Tables 13 and 14, there would be no significant impact on existing centres. In considering the impact on local centres, which have a limited range of comparison goods, there is no reason to believe that their trade will increase in line with comparison goods as a whole. MWA comments the comparison goods turnover will mostly be drawn from the same foodstores as the convenience trade. I accept this. What it means in practice is that the impact on centres is underestimated to some degree by the omission of the comparison goods sales, but it is not going to be a factor which would alter the overall conclusions. It is another factor which leads me to the conclusion that the impact assessment has underestimated the impact on local centres.

Conclusions on Impact

I do not doubt the generality of the conclusion that the greatest trade diversion will be from the Asda and Morrisons stores at Cribbs Causeway. There is likely to be some trade diversion from the large foodstores elsewhere. These are not all out of centre (e.g. Tesco, Bradley Stoke and Sainsbury, Stoke Gifford), but they are some distance from the proposal and the impact on them will be limited.

Some £3.19m of the trade diversion is allocated to the “other stores” category. This figure includes a number of shops in identified centres – particularly Westbury on Trym and to a lesser extent Southmead (although the Iceland there is identified separately) and Henleaze. It also includes at least in theory the Iceland in the Crow Lane Centre.

It is difficult for me to examine the impact on Westbury on Trym, because it has not been considered separately and there is a lack of background information in the Bristol Retail Studies. However, the centre is anchored by a sizeable the Co-op, and has, according to the 2007 Bristol City Retail Study significant comparison goods floorspace. The impact is also likely to be limited as there are a number of existing foodstores which would remain as convenient to use as the proposal. The impact on Westbury is likely to be significantly less than on Crow Lane and I shall therefore consider Crow Lane first. If the impact is significant there, I will re-examine .Westbury on Trym centre.

There is some uncertainty about the turnover of the Co-op on the Crow Lane centre. Because the household surveys give “rogue” results, MWA have based it on the floorspace and average sales density. It has already experienced trade diversion from the Aldi store, estimated by MWA as about 10% of its turnover. This would, according to MWA, be offset by the growth in available expenditure by 2019. This assumption is however, based on a constant market share and thus it is assumed that the Co-op would benefit equally from the new housing in Patchway. This is unrealistic in my view. The store is considerably smaller than the proposal, is not located on the direct route to and from the new housing areas and would not have such convenient or obvious parking. In those circumstances it is not likely to benefit significantly from the additional population in the area.

It is therefore not likely to recover as robustly from the impact of the Aldi as MWA suggests. MWA forecast that it would suffer a further £0.38m, but I have already explained why it is likely to be larger. Overall, and taking account of the cumulative impact, the Council should be considering an impact of between 20% and 30% on this store.

An impact on this scale, would pose significant operational difficulties for the store. It would have to reduce overall labour costs, but this is likely to be achieved though reducing hours, not replacing staff who leave etc rather than redundancy. It would have to reduce the range of goods on offer to reduce wastage, particularly with regard to fresh and chilled foods and investment in refurbishment is likely to become more difficult to justify. However, it is not, in my view, likely to lead to the closure of the store. It is generally better for convenience goods retailers to continue trading if they can since they would be still be liable for rent. Large organisations, such as the Co-op, generally can afford to do so.

The impact on the Co-op has to be assessed in the context of the effect on the centre as a whole. The Centre offers a mix of retailers and retail services (hairdressers, take-aways etc) and appears to be relatively healthy for such centres with low vacancy.

Although the Co-op is the largest unit in the centre and is no doubt well used, other shops will attract customers in their own right and the Co-op should not be considered as an anchor. While its closure would be a significant blow to the centre, I think this unlikely.

Even then, there is still a good level of retail interest in convenience stores with a significant number of openings of new ones by leading grocery retailers, and a re-let should not be ruled out, even if on a reduced floor area. I therefore conclude that the proposed store is not likely to cause significant adverse harm to the Crow Lane centre.

I commented that MWA had not examined the likely impact on Westbury on Trym centre, but I conclude that if the impact on Crow Lane is not significant, the impact on Westbury will not be. Not only is it significantly further from the proposal, but also a larger centre.

Impact on Investment

I commented in my earlier letter that the original submission had not examined the impact on investment but that the focus of any such assessment could be restricted to the local centres in the new neighbourhood. MWA comments that the current proposal is not likely to affect such investment as each centre will serve different catchment areas and that the rationale for a larger centre at Haw Wood is that it would also serve the existing residential areas and provide an alternative to the Asda and Morrisons stores at Cribbs Causeway. In terms of assessing the proposal in the context of the need arising from the overall residential development in the wider area, there must be some truth in this.

Proposals are being prepared for the local centre in the Central Airfield location. This suggests that the developers have not been discouraged from promoting this centre by the current application and in fact there has been no objection to this proposal from them as far as I am aware.

NLP have made representations on the proposal on behalf of the owners of the Mall at Cribbs Causeway. These do not object to the proposal but suggests that conditions are necessary to restrict the proposed centre's role to that of a local centre, including a condition to restrict comparison goods floorspace within the proposed foodstore to 210 sq m. I agree that a condition on these lines is necessary to ensure that the development does act as set out in the retail impact assessment. It may also be necessary to consider a condition limiting the subdivision of the large unit for the same reason.

Conclusions

I concluded in my earlier letter that the proposal did not fall within the definition of a local centre as set out in policy CS14 of the Core Strategy for existing centres or the new neighbourhoods. It therefore fell to be considered under the sequential test and impacts tests as set out by the policy.

I conclude that with the additional information now submitted, the applicant has met the sequential test. I also conclude that the proposal is not likely to have to a significant adverse impact on any centres, or on any planned or committed retail

investment in centres. The application therefore complies, in respect of the retail development proposed, with policy CS14 of the Core Strategy and the NPPF.

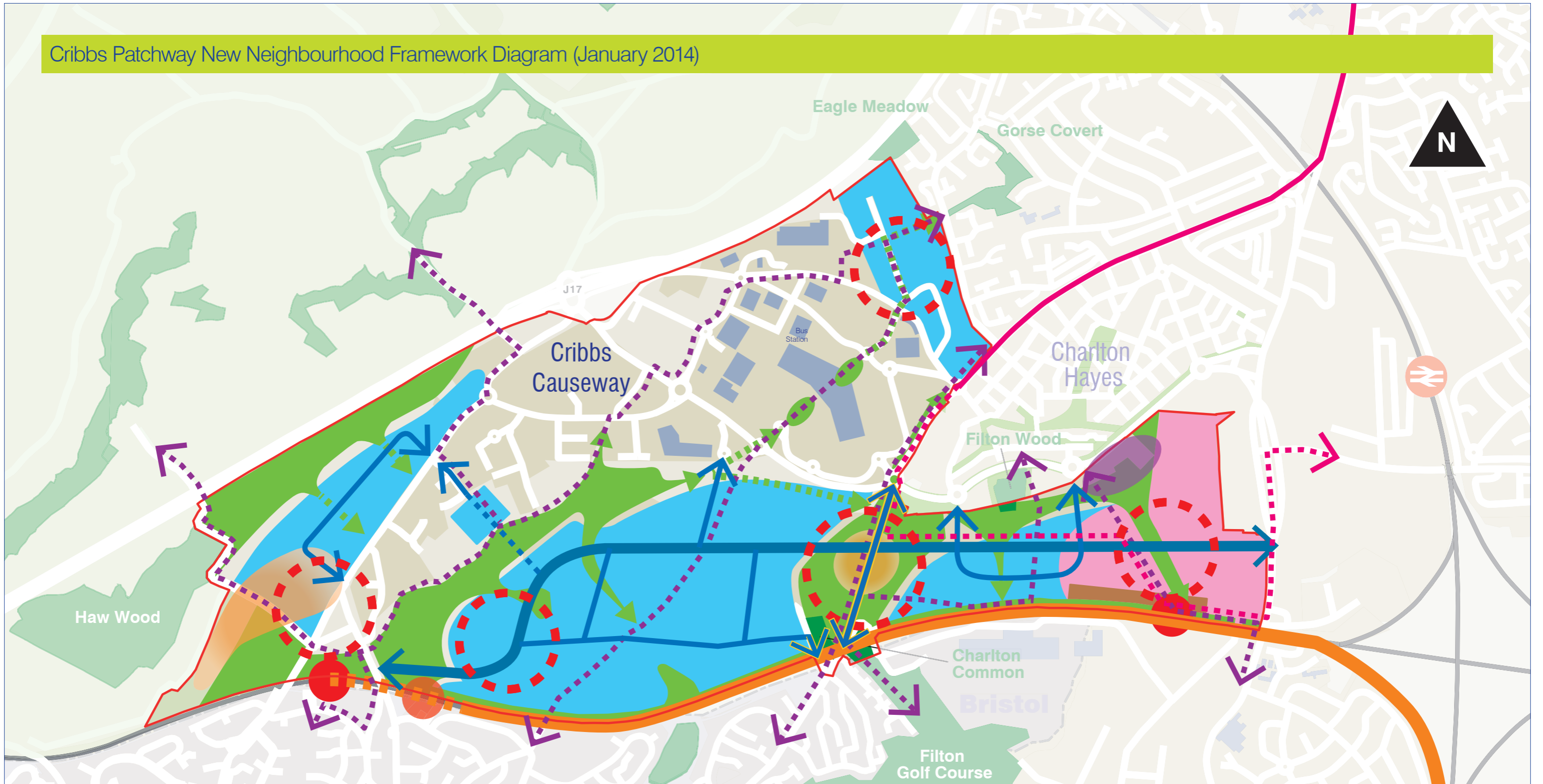
Yours sincerely

Duncan McCallum

Consultant

DPDS Ltd

Cribbs Patchway New Neighbourhood Framework Diagram (January 2014)

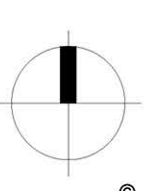


Key

- | | | | | | | | |
|-------------------------------------------------------------------------------------|------------------------------------------------|---------------------------------------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------|--------------------------|---------------------------------------------------------------------------------------|--------------------------------------------|
|  | Local Centres/
economic
development land |  | Heritage Museum |  | MetroBus (NFH) |  | Pedestrian/cycle links |
|  | Potential
GWAAC/NPAS
location |  | Employment |  | MetroWest proposals |  | Bus Priority/controlled
access junction |
|  | Residential |  | |  | Potential train stations |  | Primary road network |
| | |  | |  | Existing train stations |  | Secondary road network |
| | |  | |  | Improved railway bridges |  | Access junctions |
| | | | | | |  | Sports Provision |
| | | | | | |  | Strategic GI |



Land at Cribbs Causeway
Illustrative Masterplan
for Deeley Freed &
Skanska Residential



Drawing No. 00782_SK_008
Scale @ A1 1:2000 Rev P1

