

**DRAFT BLANDFORD + NEIGHBOURHOOD PLAN 2015-2031
COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC**

On behalf of Wm Morrison Supermarkets Plc, we thank you for the opportunity to comment on the draft Neighbourhood Plan. We do not intend to respond to all the draft policies and questions; however we set out below our response to questions 4, 6 and 8.

Q4. Do you agree with this proposal for a smaller food store than the ASDA scheme to serve the local needs of the northern part of Blandford Forum with more land safeguarded for business uses?

Policy 4 – ‘Land at Shaftesbury Lane, Blandford Forum’. The Neighbourhood Plan allocates land at Shaftesbury Lane, Blandford Forum, as shown on the Policies Map, for a mix of A1 retail and B1/B2/B8 business uses. The draft Policy confirms the following proposals will be supported:

- “i. The retail use comprises land of no more than 0.9 Ha to accommodate a building of a gross floor area of up to 2,500 sq.m. and at least 120 car parking spaces;*
- ii. The business land comprises land of at least 1.5 Ha to accommodate buildings of a total gross floor area of at least 5,000 sq.m.;*
- iii. The schemes include a landscape buffer to the A350 Blandford Forum Bypass and to the residential area to the east;*
- iv. One or both schemes make provision for a footpath and cycleway link from the site to land north of the A350 Blandford Forum Bypass.”*

We note that the draft Neighbourhood Plan refers to the Joint Retail Study (2008) which identified a need for additional convenience goods floor space in Blandford. It also confirms that planning permission was granted in 2013 for a 2,300 sq m [3,860 sq m gross) supermarket and filling station on land off Shaftesbury Lane. Subsequently Asda has advised that they no longer intend to develop this site for a new supermarket.

The draft Neighbourhood Plan states that the town is currently poorly served by convenience shops and on the basis of the growth strategy and allocations to the north and east it is considered ‘prudent to retain this land for out of centre retail uses’.

The emerging North Dorset Local Plan Part 1 refers to the Joint Retail Study (2008) which identifies a need for additional convenience goods floorspace in Blandford, but recognised that this need could

DRAFT BLANDFORD + NEIGHBOURHOOD PLAN 2015-2031
COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC

be met in full if the store now occupied by Morrison's supermarket were to re-open. Since the study was undertaken this store has re-opened and Iceland and the Co-op have also opened new stores in the town, ***"providing adequate additional floor space to meet the town's convenience shopping needs up to 2031"***. (Paragraph 8.34 North Dorset Local Plan – Part 1)

The emerging Local Plan Part 1 also confirms that the further retail and town centre studies will be prepared to inform the emerging Local Plan Part 2, however in light of the Retail Study and the emerging Local Plan Part 1, there does not appear to be a 'need' to provide for further convenience goods floorspace in the town over the plan period.

Whilst it is proposed the alternative growth strategy may deliver future housing to the north and east and there is limited convenience offer to the north of the town, the Neighbourhood Plan acknowledges that it should direct retail, leisure and tourism to the town centre (as required by the NPPF). Furthermore, both draft allocations, under Policies 2 and 3, are only 1.5 miles from the town centre. It is accepted that planning permission exists for a 3,860 sq m gross foodstore on the Shaftesbury Lane site, however Asda have confirmed they do not intend to develop this out and it appears that the planning permission will expire in 2016.

The MWA review of the Asda application concluded that the proposed store would have a 'significant' impact on the Morrisons store and the wider town centre due to the potential loss of linked trips. We accept the potential need for convenience retailing in this part of the town to meet 'day to day' needs, should the alternative growth strategy be adopted. However, local 'day to day' needs are usually met by convenience stores of around 500 sq m, not 2,500 sq m, as is being suggested by the Neighbourhood Plan.

As the site remains 'out-of-centre' any future retail allocation, for any convenience retail over 500 sq m, should be subject to the usual retail tests of sequential and impact. We would suggest that draft Policy 4 is amended accordingly.

Q6. Do you agree that this land on the edge of the Town Centre should be redeveloped for uses that attract more visitors to the town and Trailway? Has the policy identified the key principles to secure a successful scheme?

Policy 6 ‘East Street/Langton Road, Blandford Forum’ - The Neighbourhood Plan seeks to allocate land at East Street/Langton Road, Blandford Forum, as shown on the Policies Map, for a mixed use development scheme. It confirms that proposals for visitor centre (D2/A1/A3), retail (A1) and childcare (D1) uses will be supported (subject to satisfying 3 criteria).

Our client supports the objective of the policy to attract more visitors to the town and Trailway. Our client does not object to the proposed mix of use in this location, however given its edge-of-centre location we would suggest that any future proposals in terms of retail use be limited to that which is ‘ancillary’ to the visitor centre. We note that this is confirmed at paragraph 3.28, however for the avoidance of doubt we would suggest this is explicit in the wording of Policy 6 and added as a fourth criteria:

“iv. Any proposed additional retail use is to be ancillary to the visitor centre.”

Q8 Do you agree with our definition of the Town Centre Area? Do you agree with our redefined primary and secondary shopping frontages? If not, why not? Although the policy does not include proposals, do you have a view on how to improve the traffic flow within the town centre?

Policy 8 ‘Blandford Forum Town Centre’ - The Neighbourhood Plan seeks to define the Town Centre Area and the Primary and Secondary Shopping Frontages, as shown on the draft Policies Map (defined as ‘Retail Frontages’). We note that this policy seeks to make ‘minor changes’ to the primary and secondary shopping frontages, as set out in the Local Plan 2003, as follows:

- *“extending the Primary Shopping Frontage northwards to 51/52 Salisbury Street*
- *adding the food store at the Marsh and Ham car park as a secondary frontage”*

DRAFT BLANDFORD + NEIGHBOURHOOD PLAN 2015-2031 COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC

We note that the draft Neighbourhood Inset Plan 3 does not appear to correspond with the proposed changes under the second bullet, in that the store (including the main entrance) is defined as Primary Retail Frontage ([Blandford Forum to provide clarification here](#)).

On that the basis that the Morrisons store is to become Secondary Retail Frontage, our client is understandably concerned given the stores role and function in the town centre. Furthermore, there appears to be no justification for the extension of the primary shopping frontage northwards along Salisbury Street.

The NPPF sets out clear guidance on 'Ensuring the vitality of town centres' including at paragraph 23 which confirms that planning policies should be positive, promote competitive town centre environments. They should also set out policies for the management and growth of centres over the plan period, these should: [inter alia]

- *“define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;*
- *allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;”*

The Annex 2 to the National Planning Policy Guidance defines 'Primary and secondary frontages' i.e. Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

The 2008 Joint Retail Study included a survey of Blandford Forum Town Centre in order to define primary and secondary frontages and we attach an extract plan from the Study which defines this. The text below has been extracted from the Study which explains this in more detail.

DRAFT BLANDFORD + NEIGHBOURHOOD PLAN 2015-2031
COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC

“The main shopping area of Blandford Forum forms an “L” shape and is concentrated along Salisbury Street and Market Place with Secondary Retail Frontage located along East Street, West Street, White Cliff Mill Street and Salisbury Street. There are also several side streets, such as Greyhound Square, Barnack Walk and Tabernacle Walk and The Plocks, within which shops are also located.”

The draft Neighbourhood Plan provides no justification / reasoning behind the proposed policy to change the primary and secondary frontages. In respect of extending the Primary Shopping Frontage northwards along Salisbury Street, it is unclear why this is being proposed given that it contradicts the recommendations of the 2008 Joint Retail Study. As outlined above, primary frontages are likely to include a ‘high proportion of retail uses’ which does not reflect what exists along this section of Salisbury Street.

The Morrisons store acts as an ‘anchor’ as it attracts a significant number of customers to the store. It promotes opportunities for linked trips to the rest of the town centre for customers using the store and car park. Whilst we do not have any specific data for the Morrisons at Blandford Forum, a previous study has been carried out in respect of three existing Morrisons to assess the occurrence, frequency and type of linked trips. This comprised an exit survey by an independent survey company (NEMS Market Research) and a total of 1,293 face to face interviews. Whilst the location of the stores varied to between 130m to 500m from the Primary Shopping Area, as a whole 44.1% of respondents had or intended to incorporate visiting the Morrisons store with a linked trip to the town centre on that day.

The Morrisons store is an important anchor for the town centre (as acknowledged by MWA Retail Reports) as it benefits from direct access onto the Market Place and therefore should be retained as Primary Shopping Frontage (as shown on the 2003 Local Plan – extract attached).

We also note that the Policy 8 seeks to refuse any applications that result in the net loss of car parking, however it is unclear what evidence has been put forward in support of this. We would expect such policies to be supported with an assessment of existing car parking including capacity / stress surveys.