

Purbeck Local Development Framework

Core Strategy Examination

Statement submitted by Savills on behalf of the Scott Estate (Wareham) on Matter 7: Retail (Policies RFS and RP)

Respondent reference: Scott Estate Wareham (SNG): 6406

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Savills act as agents for the Scott Estate which is the owner of land at Worgret Road roundabout at Wareham identified for residential development under Policy CEN: Central Purbeck. These representations are made on behalf of the Estate. The land is under option to Bloor Homes Limited who have made representations to the examination concerning its proposed development for residential purposes.

The agreement with Bloor Homes provides that they will pursue residential development on the land but that if part of it is deemed suitable for a mixed use development including housing and a retail store then the scheme will be designed to accommodate the two uses.

Discussions have taken place with a number of food store operators who are all very keen to secure an agreement for a food store on the land. They consider it is the most appropriate location at Wareham for the provision. An agreement with Sainsbury, who currently operate the store in the town centre, has been agreed in principle and an agreement is at heads of terms stage.

Matter 7: Retail (Policies RFS and RP)

7.1 Is the Retail Impact Assessment based on robust evidence?

1. A Retail Impact Assessment was been prepared by Nathaniel Lichfield and Partners (NLP) in September 2010. This follows on from a joint retail study carried out by NLP in 2008 covering 4 districts in Dorset, including Purbeck. This has been followed up by further documents by NLP including a Statement from Nathaniel Lichfield and Partners 19th October 2010 and a letter from them to Purbeck District Council dated 25th November 2011. In addition there is a Retail Health Check 2008 – 2010 document prepared by Purbeck in Autumn 2010. Thus there has been extensive analysis carried out over a number of years on which provides a considerable body of evidence to determine the need for additional retail provision.
2. The NLP reports have all indicated a need for additional convenience shopping provision and identification of the need for a 2,000 sq m store. Any competition between this and the existing shopping offer in Wareham could be minimised through planning restrictions (the NLP RIA Para 1.26). Paragraph 1.27 goes on to state "*It is not considered that food store development would cause significant adverse impact on either Swanage or Wareham in terms of the Government's PPS4 policy tests set out in EC10 and EC16.*" Whilst the NPPF has now replaced the PPS NLP's conclusions are clear.

3. In their statement on 19th October 2010 NLP state at Para 1.2 “*The final (RIA) report dated September 2010 recommends that a new foodstore be allocated in Wareham in the LDF.*”
4. In their letter of 25th November 2011 NLP state that stores in Wareham are trading at about benchmark and those in Swanage well above this level. Paragraph 6.7.3.1 of the Pre-submission Core Strategy September 2011 states that whilst 75% of household food expenditure in Swanage remains in Purbeck this falls to 55% in Wareham and is considerably lower in some parts of the District. Despite this loss of trade from the District stores are considered to be trading at or above benchmark levels. A further large convenience store at Wareham will to reduce this leakage and this in turn is likely assist the other shops to trade at or above benchmark levels as shoppers reduce their travel to shop.
5. In summary there is an extensive evidence base and its conclusions are clear. There is a need for a large foodstore at Wareham. Regrettably the policies do not reflect the evidence base.

7.2 Should the allocation of retail floorspace be resolved in the Core Strategy?

6. The provision of retail floorspace is a key component of a sustainable pattern of development for any District. It is therefore essential that the core Strategy is reflective of the evidence base if it is to accord with the requirements of the NPPF. Paragraph 14 of the NPPF is perhaps at the cornerstone of this with the presumption in favour of sustainable development. In the Plan making process this requires it states “*Local Authorities should positively seek opportunities to meet the development needs of their area.*” It goes on to state “*Local Plans should meet the objectively assessed needs*”. Since the evidence base prepared for Purbeck District Council is unequivocal in identifying the need for a new large food store at Wareham it cannot be sound policy to ignore the evidence and not make such a provision within the strategic allocations in the Core Strategy.
7. The evidence is clear that a foodstore at Wareham is a sustainable development and so to comply with the obligations of the Council under the NPPF in its plan making role it must allocate a site for a new foodstore at Wareham.

8. There are other references within the NPPF reflecting this obligation including the core planning principles set out at Para 17. Every effort should be made objectively to identify and then meet the housing, business and other development needs of the area. A foodstore has been identified as such a need yet is not currently being proposed within the policies. The penultimate bullet point requires the pattern of growth to make the fullest possible use of public transport, walking, cycling and to focus significant development in locations which are or can be made sustainable. A large foodstore on or close to the Worgret Road roundabout which is the gateway to the Isle of Purbeck will intercept people who currently travel to the nearest available large foodstores which Purbeck's own retail health check confirms are at Blandford, Dorchester, Weymouth Poole and Wimborne. The provision of a store in this location will meet the criteria set out in the NPPF. The requirements of Paras 24 and 26 have been reflected in the recommendations of NLP in the Retail Impact Assessments they have conducted for the Council.

9. Paragraph 154 indicates that "*Local Plans should be aspirational but realistic. They should address the spatial implications of economic social and environmental change.*" The evidence base is clear in identifying the need for a foodstore at Wareham yet the Core Strategy fails to meet this need. It therefore fails to comply with the requirements of the NPPF in relation to this matter.

10. Paragraph 156 of the NPPF requires Local Authorities to set the strategic priorities for the area out in the Local Plan. This includes "the provision of Retail, Leisure and other commercial development" To do otherwise than to include the necessary strategic foodstore provision in the policies must render the plan unsound.

7.3 Does policy RFS sufficiently reflect national policy? Is policy RFS sufficiently clear?

11. Policy RFS does not reflect national policy. I have indicated above a number of references to the NPPF from which it is clear that the policy has been drawn up in such a way that it does not reflect the conclusions of an extensive evidence base. Accordingly the RFS is not sufficiently clear and should be redrafted to provide for the development of a foodstore of up to 2,000 sq m net retail space at Worgret Road Wareham being the only location available to meet the sequential test for the town itself and to serve the wider rural community of the Isle of Purbeck.

