



Consultation Response Form

Your contact details

If you are completing a paper copy of this form please use CAPITALS and BLACK INK.

Your details		Your Agent's details (if you have one)	
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*We aim to minimise the amount of paper printed and sent out. Therefore, where an email address is supplied, future contact will be made electronically.

This response contains pages including this one.

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Please tick the box if you would like us to notify you when the Land Allocations Development Plan Document is submitted to the Secretary of State for independent examination and when it is adopted by the Council.

Land Allocations - Further Consultation

Please use this form to comment on:

1. Alternative sites put forward by respondents to the earlier Land Allocations consultation (January - April 2011);
2. Time span of the Land Allocations document
3. The approach to development in small villages, hamlets and the countryside.

Please complete one of these sheets for every response you make.

(Please also note that comments made in earlier consultation need not be repeated.)

1. Alternative Sites

Please let us have your views on alternative sites suggested by respondents to the previous consultation. (Please note, these are not SLDC suggestions.)

Which site do you wish to comment on?		
Settlement (e.g. Natland)		Site reference number (e.g. RN298#)
Ulverston East Ulverston North Ulverston South		MN31# M28# E19# and M11M#
Please indicate below whether you support, support in part or oppose the suggestion that this site be included in the Land Allocations document (please tick as appropriate)		
Support <input type="checkbox"/>	Support in part <input type="checkbox"/>	Oppose <input checked="" type="checkbox"/>
Please explain your reasons/add your comments below (continue on a separate sheet/expand box if necessary)		

As a key stakeholder within Ulverston, The Co-operative Group support both further investment and regeneration within the town. However, it is important that any proposals which will deliver economic development are appropriate to the role of Ulverston and comply with both local level planning policy in the form of the Development Plan and with the national planning policy requirements set out within PPS 4: Planning for Sustainable Economic Growth (PPS 4).

We have included all of the site references within one consultation response as they all raise the same issues and concerns from the Co-Operative Groups' perspective.

It is our view that the proposed site allocations put forward for all of these sites with regard to the food retailing uses (A1) would be contrary to both the adopted South Lakeland Core Strategy October 2010 and the guidance contained in PPS 4 with regard to proposals for main town centre uses in particular.

The proposed allocations are all in out of centre locations as far as the guidance in PPS 4 is concerned and having regard to the existing and proposed town centre boundary shown on the proposals map of the Local Plan and emerging through the Site Allocations DPD.

In line with the requirements of PPS 4, the Council's Core Strategy (CS) establishes a hierarchy of retail centres through the Borough, which will be the preferred location for new development for main town centre uses, including new convenience and comparison retail floorspace. The retail policies within the CS were supported by a Retail Study undertaken by Martin Tonks in 2007 to establish the quantitative and qualitative need for additional convenience and comparison floorspace within the Borough.

Policy CS3.1 of the Core Strategy relates specifically to the adopted spatial strategy being pursued for the Ulverston and Furness area. The section under this policy relating to the economy makes it quite clear that the focus for new retail development will be on the town centre to support its vitality and viability and comments that the Council will inter alia;

- Protect and enhance the vitality and viability of Ulverston Town Centre
- Support the development of new retail provision in the town centre to accommodate both convenience and comparison shopping.

There is therefore no reference within the spatial strategy to the town accommodating additional retail provision outside of the town centre and as such the proposed allocations being put forward would clearly run counter to the adopted Development Strategy in this respect.

Policy CS7.5 Town Centre and Retail Strategy sets out the Council's retail hierarchy across the Borough and identifies Ulverston Town Centre as a medium sized town centre which serves a wide rural catchment area.

Whilst the policy seeks to address issues of trade leakage to areas outside of the relevant centres, it clearly supports the town centre first approach advocated by PPS 4 by seeking to enhance local provision within centres and encourage local sustainable shopping patterns. Equally, it specifically comments that the development of additional retail floorspace outside the recognised centres will normally be strongly resisted. An assessment of the proposed site allocations in respect of the policies are outlined further below.

The above policies were supported by a retail study undertaken by Martin Tonks in 2007. In terms of the Ulverston area itself whilst it did acknowledge some trade leakage to Barrow from the catchment area of Ulverston, it only identified a small amount of quantitative and qualitative need for additional retail floorspace to support the role of the Town Centre.

The Co-Operative Group's response

As outlined earlier, all of the sites put forward in this respect are located outside of the recognised town centre boundary of Ulverston as shown on the proposals map of the Adopted Local Plan and as shown on the revised town centre boundary contained in the emerging Site Allocations DPD. The sites would therefore in our view be classed as out of centre when considered against the criteria in PPS 4.

It is not clear as to whether the individual sites have been supported by retail impact assessments and sequential assessment as required by PPS 4 however it is our view that the allocation of such sites is likely to have a significant adverse impact on the vitality and viability of Ulverston Town Centre and would be clearly contrary to Policy CS3.1 and CS7.5 of the Core Strategy and the guidance contained in PPS 4.

Although the Council's retail study which was used to support the CS preparation and examination identified some additional capacity for retail floorspace in Ulverston to address issues of trade leakage elsewhere, this was of a limited scale and did not identify a pressing need for the scale of development that is likely to come forward as part of these proposed sites.

Indeed this study only identified a need in the region of 900sq.m of additional convenience floorspace in Ulverston (based on one of the 'big 4's' company average sales densities) and that the additional capacity identified would not support any additional floorspace beyond this by 2015. Although the study identified a qualitative need for some additional retail floorspace, the key here was to secure a site within the Town Centre which would generate a greater degree of footfall to help retain expenditure locally.

Given the location of the proposed sites in out of centre locations which in our view relate poorly to the main town centre in terms of promoting linked trips and accessibility, it is likely that any additional retail floorspace on these sites would have the exact opposite effect of generating greater footfalls within the main town centre, by creating single destination sites which will draw shoppers away from the town centre.

In addition to the above, a planning application is currently being considered by the LPA seeking outline consent for the erection of a new supermarket with car parking with a net retail sales area of around 1,900sq.m (Planning application ref: SL/2011/0564).

Whilst the Co-Operative Group have made a number of representations in respect of the robustness of the retail study submitted in support of this application, the LPA have instructed their retail consultant Martin Tonks to consider the application in the light of national and local plan policies relating to retail development.

I do not intend to repeat all the issues with this scheme here, particularly as the Co-Operative Groups concerns with this scheme are already in the public domain, however the important point to note is that the LPA's retail consultant acknowledges that this edge of centre scheme is likely to have a much greater impact on trade draw from the town centre itself than the applicants have modelled/assessed.

It is therefore not unreasonable to conclude that proposals for arguably much larger food retail proposals in more remote, out of centre locations are likely to have a much greater impact in terms of trade draw from the town centre, which are subsequently likely to have a significant adverse impact in this respect.

In such a context, the guidance contained in PPS 4 is clear in this respect in that LPA's should refuse consent for such proposals. We would argue that the same approach would apply to considering suggested sites as part of the Site Allocations DPD.

Conclusion

As outlined above, the proposed site allocations (referenced MN31#, M28#, E19# and M11M#) put forward for new retail development are located in out of centre locations which relate poorly to the main town centre of Ulverston and are likely to have significant adverse impacts on the town centre itself.

The out of centre locations would run counter to the adopted Spatial Strategy relating to retail development and the retail hierarchy within the Adopted Core Strategy and the allocation of such sites would be likely to seriously undermine this spatial approach towards retail development.

There is no pressing need for additional retail floorspace of the size and scale likely to be put forward at the proposed sites and this has been confirmed through the Council's own Retail Study in 2007 which was used to support the preparation of the Core Strategy, and more recently through the consultation response submitted by the Council's own retail consultant (Martin Tonks) in respect of planning application reference SL/2011/0564.

The allocation of the above sites for additional food retail development would be contrary specifically to Policy CS3.1 and CS7.5 of the Adopted Core Strategy and the guidance contained in PPS 4.

We therefore wish to register our strong objection to the food retail uses put forward as part of these suggested sites and urge the Local Planning Authority to dismiss the suggested proposals as part of the emerging Site Allocations DPD.

I trust that the above comments are clear and of use however should you wish to discuss any of these points further please do not hesitate to contact me via the details provided. I would also be grateful if you could add me to your contact list for further notifications about the progress of the DPD.

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2. Time Span of Land Allocations Document:

Should the Land Allocations document plan period remain 2003 – 2025 or cover a shorter period, for example, 2003-2020?

Please indicate whether you support, support in part or oppose a reduction in the time span of the Land Allocations document (please tick as appropriate)

Support ☐

Support in part ☐

Oppose ☐

Please explain your reasons/add your comments below (continue on a separate sheet/expand box if necessary)

No specific comments to make.

3. Small Villages, Hamlets & Open Countryside

Do you think the future housing and employment land needs of small villages, hamlets and open countryside are best met by: -

- A. Allocating sites for houses and employment in the Land Allocations document; or
- B. Communities and/or developers bringing forward sites for housing and employment for consideration under relevant Core Strategy policies, through neighbourhood plans and/or other local initiatives.

Please indicate which of the above options you would support. (Please tick as appropriate)

A ☐

B ☐

Please explain your reasons/add your comments below (continue on a separate sheet/expand box if necessary)

No specific comments to make.

Thank you for your views and suggestions.