

Save Walden Town Centre

OBJECTION TO PLANNING APPLICATION UTT/1323/09/FUL FOR AN EXTENSION TO TESCO, RADWINTER ROAD, SAFFRON WALDEN



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1 INTRODUCTION

Purpose of report

- 1.1 On behalf of Save Walden Town Centre, Roger Tym & Partners (RTP) object to the planning application submitted by Tesco Stores Ltd. for an extension to their existing store at Radwinter Road in Saffron Walden.
- 1.2 We have reviewed the Retail Assessment (GL Hearn, October 2009) and the Supplementary Retail Statement – PPS4 review (GL Hearn, February 2010) accompanying the proposal, and set our objections out in detail in this report.

RTP's understanding of the proposal

- 1.3 The application is for an extension to an existing foodstore, and an extension to the bulk store / loading bay. The scheme would increase the floorspace of the store from 2,279 sq m net (sales) to 3,553 sq m net. Of the 1,274 sq m of net floorspace gained, 388 sq m will be for convenience goods and 886 sq m for comparison.
- 1.4 The site is 1km from Saffron Walden town centre; it is therefore out-of-centre.

Planning History

- 1.5 Outline permission for a 2,076 sq m net store was granted at appeal in May 1991, with approval of reserved matters granted in October the following year. There have since been two minor extensions permitted in 2000 and 2001, resulting in a total floorspace of 2,279 sq m net today.
- 1.6 Tesco applied for a further extension of 784 sq m net in January 1998. The application was refused on retail grounds, the reasons for refusal stating that *"the implementation of the proposed development would adversely affect the vitality and viability of existing town centre retail outlets"*, thus contravening Policy R2 of the District Plan, which formed part of the relevant development plan at the time. The refusal was upheld on appeal.

Structure of report

- 1.7 The structure of the remainder of this report is as follows:
 - In Section 2 we provide a brief review of the planning policy context;
 - In Section 3 we discuss the applicant's impact assessment;
 - In Section 4 we discuss the applicant's sequential assessment;
 - Our objections are summarised in Section 5.

2 PLANNING POLICY

2.1 In this section we briefly review the RIA against the relevant planning policy tests and criteria in Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4). In addition, the submitted application must, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004, be assessed having regard to the development plan. The development plan consists of the saved policies of the Uttlesford Local Plan (2005) and the emerging Core Strategy.

PPS4 and Practice Guidance

2.2 In March 2009 the Government announced its intention to streamline national policy. PPS4 Planning for Sustainable Economic Growth was adopted in December 2009. This replaces PPG4, PPG5, PPS6, parts of PPS7 and parts of PPS13. Retail development is included in the PPS4 definition of "economic development".

2.3 Policy EC14 states that applications for main town centre uses that are not in an existing centre should be accompanied by a sequential assessment. It also states that applications for main town centre uses which are not in an existing centre and not in accordance with an up to date development plan, that would be likely to have a significant impact on other centres, should be accompanied by an impact assessment. In our opinion both these assessments are required – the application is for a main town centre use, is on an out-of-centre site, is not in accordance with an up to date development plan and would be likely to have a significant impact on Saffron Walden town centre.

2.4 Policies EC15 and EC16 set out further detail on what these assessments should include. Policy EC16 sets out six factors which the impact assessment should take account of, including "current and future consumer expenditure capacity in the catchment area up to five years from the time the application is made" (ie quantitative need) and "local consumer choice and the range and quality of the comparison and convenience retail offer" (ie qualitative need).

2.5 The Government has also published Practice Guidance (December 2009). This provides more detailed guidance on how the sequential and impact assessments should be undertaken. The Practice Guidance does not constitute a statement of Government policy. However, it is guidance intended to assist those involved in preparing or reviewing need, impact assessments and sequential site assessments. It has been used in this context in formulating this report.

Uttlesford Local Plan 2005

2.6 Paragraph 8.1 sets out the objectives of the policies on "retailing and services" – these include:

- "To sustain and enhance the vitality and viability of Saffron Walden as a principal shopping centre...
- To focus retail and mixed use commercial developments in locations that maximise the opportunities to use means of transport other than the private car".

- 2.7 Paragraph 8.2 states that “This Plan allows for [development] which could meet the need for additional retail floorspace ... albeit not in large stores because of an absence of suitable sites within centres or in edge of centre locations” and stresses that national and county [structure plan] policy says retail uses attracting large numbers of people should be located in town centres. The plan does not mention allowing any out of centre floorspace.
- 2.8 Policy RS2 states that retail development in Saffron Walden must maintain or enhance its role as a retail centre and contribute to the diversity of the retail offer.
- 2.9 These policies have been “saved” whilst the Council prepares its Local Development Framework (LDF).

LDF Core Strategy Preferred Options (February 2010)

- 2.10 Section DC11 of the Core Strategy Preferred Options document covers Function of the Market Towns, defined as Saffron Walden and Great Dunmow. The preferred option is to “encourage new retailing, commercial and other development which will maintain and enhance the roles of Saffron Walden and Great Dunmow as retail and service centres.”
- 2.11 The supporting text emphasises the need for Uttlesford (and by extension Saffron Walden as the principal town) to provide for its inhabitants’ convenience shopping needs without having to travel outside the district and to meet “some, if not all, comparison goods needs”. The document notes that the consultation document proposed allowing additional edge-of-centre floorspace (including the expansion of existing supermarkets); however retailers in Saffron Walden raised objections and the Council acknowledge that this approach requires further testing. We note that the document does not contemplate out-of-centre floorspace being permitted.

Retail Study 2005

- 2.12 The Uttlesford Local Development Framework: District Retail Study (DRS) was prepared by Hepher Dixon on behalf of Uttlesford District Council. It was completed in December 2005.
- 2.13 The study concluded that there was capacity for approximately 722 sq m gross additional convenience floorspace in Uttlesford by 2008, rising to 1,381 sq m gross in 2013 and to 1,933 sq m gross in 2018.
- 2.14 For comparison spending Hepher Wilson calculated the capacity only by individual zone and did not extrapolate to the district as a whole. The study calculated that in zone 1 (which roughly equates to Saffron Walden) there was capacity for 3,835 sq m gross additional comparison floorspace in 2008, rising to 8,747 sq m gross in 2013 and to 14,882 sq m gross in 2018.
- 2.15 Because the quantitative calculations were undertaken pre recession, they were based on high expenditure growth rates which no longer apply – hence the need for new up to date calculations as part of the applicants’ impact assessment. In addition, the study affords very little attention to qualitative need, which PPS4 now requires applicants to consider.
- 2.16 The study indicates that the ability to accommodate new floorspace could be problematic, pointing out that “all existing centres appear to have limited physical potential for

expansion. A number of sites have been identified in the town centres in the past but very little development has taken place in recent years.”

3 IMPACT ASSESSMENT

Policy requirements for the impact assessment

- 3.1 EC16.1 of PPS4 states that planning applications for main town centres uses that are not in a centre and not in accordance with an up to date development plan should be assessed against the following relevant impacts on centres:
- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal
 - b) the impact of the proposal on town centre vitality and viability, including local consumer choice and the range and quality of the comparison and convenience retail offer
 - c) the impact of the proposal on allocated sites outside town centres being developed in accordance with the development plan
 - d) in the context of a retail or leisure proposal, the impact of the proposal on in-centre trade/turnover and on trade in the wider area, taking account of current and future consumer expenditure capacity in the catchment area up to five years from the time the application is made, and, where applicable, on the rural economy
- 3.2 The Practice Guide states that *"The starting point for the assessment is a realistic assessment of current consumer spending and shopping patterns, based on modelling supported by survey evidence"*. We therefore discuss, below, the applicant's comments on need and capacity, before moving on to look at trade draw.

Quantitative need

Convenience need assessment by the applicants

- 3.3 The applicants assess need in Section 5 of the Retail Assessment. They use population estimates and projections from Experian. They obtain per capita convenience goods based expenditure estimates from Experian and project them forward using a growth rate of 0.7% per annum from Experian's Retail Planner Briefing Note 7.1, Figure 1. This is the long term (1978-2008) growth rate.
- 3.4 The applicants calculate (at para. 5.33 of the Retail Assessment) that convenience goods expenditure in the Study Area will grow by £4.22m between 2008 and 2012. They then say that taking into account overtrading at existing Study Area stores, and the potential to clawback expenditure from outside the Study Area, increases this available expenditure to £5.46m.
- 3.5 The turnover of the proposed extension at 2012 is shown in Table 7 of the Retail Assessment. Convenience goods turnover is estimated as £4.30m.

RTP's analysis of convenience need

- 3.6 Given that need is being assessed in the medium term, we do not think it is appropriate to use the long term growth rate to project expenditure forward. Experian's Retail Planner Briefing Note 7.1 provides yearly convenience expenditure growth rates; using these is

surely the most accurate approach. These growth rates take into account the lower growth expectations which result from the economic downturn. Experian state at p9 of the Note that “In the medium term (to 2016), growth in retail sales volumes will be much slower than during the past decade and slower than in the long and ultra long term”. The annual growth rates are shown Table 3.1.

Table 3.1 Convenience goods expenditure growth rates

2008-09	-0.5%
2009-10	-0.2%
2010-11	0.6%
2011-12	0.8%

Source: Experian Retail Planner Briefing Note 7.1, Figure 1

- 3.7 It is worth noting that the latest forecasts from the other provider of retail expenditure growth rates, Oxford Economics / Pitney Bowes, are similar to those set out in the table above. Their Information Brief 09/02 (September 2009) sets out growth rates of -0.8% per annum for the period 2008-2010 and 0.5% per annum for the period 2008-2014. They concur with Experian’s view of growth in the medium term, stating at p5 of their Brief that “Recent rises in unemployment are expected to impact upon consumption growth in the short and medium term. Along with tighter lending conditions, higher unemployment is forecast to be a legacy of the current recession and as such Oxford Economics have significantly revised down its UK consumer spending forecasts”.
- 3.8 Using the rates as set out in Table 3.1, above, results in expenditure growth of £3.06m for the period 2008-2012. This is lower than that estimated by the applicants.
- 3.9 We do not think that there is any potential for clawback. The convenience expenditure retention rate in the Study Area is currently 79% and we do not consider that there is scope to increase it. In our evidence base studies undertaken for local authorities across the country, we have found a wide variation in convenience retention rates, but 70-80% retention of local spend is high. Therefore it is logical to assume that the retention rate will stay the same, ie 79%, in future years. This means that surplus convenience expenditure available to support new floorspace at 2012 will be £2.4m.
- 3.10 In our opinion, overtrading has been greatly over estimated. Table 5, Appendix D, shows an estimated convenience sales density for the existing Tesco store of £11,974 per sq m. Using the latest Tesco sales densities published by Verdict and Mintel, together with the convenience / comparison floorspace splits published by Verdict, we estimate a current “benchmark” or company average sales density for Tesco of around £13,100 per sq m for

convenience goods floorspace¹. Tesco themselves in fact set out a similar convenience sales density (actually slightly higher at £13,400 / sq m) in the landscape table of Appendix X accompanying their letter to the Council dated 27 July 2010.

- 3.11 Therefore the existing Tesco store is in fact undertrading. Waitrose in Saffron Walden has an estimated convenience sales density for of £11,962 per sq m, only slightly above the company average of around £11,500 per sq m, and therefore is only slightly overtrading. Therefore there is no scope to add overtrading to the quantitative need figure.
- 3.12 In any case, although overtrading can be included in quantitative need assessments, it should not be used to justify additional floorspace at an out-of-centre location. The appeal decision regarding the refusal of permission of an Asda in Chippenham in May 2009 makes it clear that overtrading in one out-of-centre store does not justify another out-of-centre store.
- 3.13 Furthermore, the applicants have under estimated the likely turnover of the extension. In our opinion the new floorspace is likely to trade at the Tesco convenience sales density of £13,100 per sq m rather than the £11,086 per sq m used by Tesco in Table 5, Appendix D. Using the correct sales density results in an estimated turnover of £5.08m for the 388 sq m net convenience element of the proposal. This is considerably higher than the surplus expenditure of £2.4m, therefore there is no capacity for the proposed new convenience floorspace.

Comparison need assessment by the applicants

- 3.14 Again the applicants use population estimates and projections from Experian. They obtain per capita comparison goods based expenditure estimates from Experian and project them forward using a growth rate of 4.6% per annum. This does not match any of the growth rates set out in Experian's Retail Planner Briefing Note 7.1, Figure 1 but is closest to the 1968-2008 growth rate of 4.7% per annum.
- 3.15 Table 1 at Appendix D of the Retail Assessment shows that comparison goods expenditure in the Study Area will grow by more than £30m between 2008 and 2012 (not £60m as stated at para. 5.45). The applicants say that taking into account the potential to clawback expenditure from outside the Study Area will increase the available expenditure further.
- 3.16 The turnover of the proposed extension at 2012 is shown in Table 7 of the Retail Assessment. Comparison goods turnover is estimated as £3.10m.

RTP's analysis of comparison need

- 3.17 Again, given that need is being assessed in the medium term, we do not think it is appropriate to use the long term growth rate to project expenditure forward. Experian's Retail Planner Briefing Note 7.1 provides yearly comparison expenditure growth rates, and using these would in our view be the most accurate approach. These growth rates take

¹ Using Verdict on UK Grocery Retailers (2009) and Mintel Retail Rankings (2010), excluding petrol and café sales and allowing for VAT.

into account the lower growth expectations which result from the economic downturn and are shown in Table 3.2.

Table 3.2 Comparison goods expenditure growth rates

2008-09	1.1%
2009-10	-0.4%
2010-11	1.1%
2011-12	2.5%

Source: Experian Retail Planner Briefing Note 7.1, Figure 1

- 3.18 Again it is worth noting that the latest forecasts from the other provider of retail expenditure growth rates, Oxford Economics / Pitney Bowes, are similar to those set out in the table above. Their Information Brief 09/02 (September 2009) sets out growth rates of -2.7% per annum for the period 2008-2010 and 1.6% per annum for the period 2008-2014.
- 3.19 Using the growth rates set out in Table 3.2, above, results in a far lower expenditure growth; £10.35m. In our opinion, there is little scope for clawback because the current retention rate of 42% is reasonable (compared to other areas we have studied), particularly considering the ease of access to higher order centres such as Cambridge. Assuming therefore that the retention rate stays the same at 42% means that comparison expenditure available to support new floorspace in the catchment area at 2012 will be £4.35 – much lower than the applicant’s estimate.
- 3.20 It is usual when assessing comparison expenditure growth to make an allowance for Special Forms of Trading (SFT), ie spend via the internet and catalogues. The Retail Assessment states that no deduction has been made to the comparison expenditure per head for SFT, instead spending made by households through these channels (as shown by the results of the household survey) is excluded from the capacity calculations. It is not clear, however, whether the applicants have allowed for an increase in SFT at the forecast years. Experian’s latest guidance on SFT is found in their Retail Planner Note on Non-Store Retailing (March 2010). This states that at 2008, SFT accounted for 9.6% of comparison goods expenditure and forecasts that this will rise to 12.7% by 2012. If the projected increase in SFT has not been taken account of, a deduction needs to be made at the forecast year.
- 3.21 Again, in our opinion, the applicants have under estimated the likely turnover of the comparison floorspace element of the extension. Using the latest Tesco sales densities published by Verdict and Mintel, together with the convenience / comparison floorspace splits published by Verdict, we estimate a current “benchmark” sales density for Tesco of

around £9,200 per sq m for comparison goods floorspace². Tesco set out a similar comparison sales density in the landscape table of Appendix X accompanying their letter to the Council dated 27 July 2010. They used a slightly higher comparison goods sales density (£9,704 per sq m) in the Retail Assessment in support of their proposed store in Holmfirth, Yorkshire³ which would be of an almost identical size to the proposed enlarged Saffron Walden Tesco (with a net sales area of 3,561 sq m compared to the Saffron Walden 3,553 sq m).

- 3.22 Using the correct sales density results in an estimated turnover of £8.15m for the 886 sq m net comparison element of the proposal. This is considerably higher than the surplus expenditure of £4.35m and therefore there is no capacity for the proposed new convenience floorspace.
- 3.23 It is also likely that, due to Saffron Walden's much greater than average affluence, sales densities of new floorspace could be higher than average. The PPS4 Practice Guidance recommends, at para. D.15, that "that sensitivity testing a high and low level of turnover is carried out and that the implications of this be examined where the predicted levels of impact suggest such testing is necessary". This has not been carried out.
- 3.24 The applicant argues, in the Retail Assessment, that the extension floorspace will only trade at 50% of Tesco's average sales densities. We are aware that this argument has been advanced in other applications, and it may be correct in relation to certain extensions. However, Tesco have not provided any evidence to justify this claim, nor any information as to whether the current extension is comparable with any other extension which may have traded at below average store densities. We also note that new store developments, which we assume will have similar layouts to modern extensions, are generally assumed to trade at 100% or more of average sales densities. We do not believe therefore that the applicant should apply any discount in its forecast trading levels without proper justification.
- 3.25 In addition, the recent Government announcement to increase VAT from 17.5 to 20% could restrict available expenditure further.

Qualitative need

Qualitative need assessment by the applicants

- 3.26 The applicants claim that although the household survey shows the store trading at company average trading densities, information provided by Tesco indicates the store is in fact overtrading, and that this has led to the store suffering from some of the features typically associated with an over-trading store, such as congestion.
- 3.27 They state that the current store has seen little in the way of qualitative improvements since 1993 and as a result, shopping conditions are below an acceptable standard. The applicants claim that the inadequacies of the existing store lead to the necessity for more

² Using Verdict on UK Grocery Retailers (2009) and Mintel Retail Rankings (2010), excluding petrol and café sales and allowing for VAT.

³ Retail Assessment prepared by DPP LLP for Tesco Stores (June 2009), p86 Table 6

top-up shopping, meaning more unnecessary car journeys, and that the extended store will be able to provide greater consumer choice.

RTP's analysis of qualitative need

- 3.28 As discussed, the figures show that the existing store is undertrading. Although there may be a need to refurbish and upgrade the store, this does not necessarily mean that there is a need to expand the floorspace or to increase the comparison range.
- 3.29 There is already, in our opinion, significant consumer choice in the immediate area, with the out-of-centre Tesco store, in-centre foodstores including Waitrose, and Saffron Walden town centre providing a range of comparison outlets. Therefore we do not consider that there is a qualitative need for this proposal.

Trade draw

Trade draw by the applicants

- 3.30 The applicants set out estimated trade diversion figures in Table 8, Appendix D. They claim that the convenience goods turnover of the extension will be diverted for the most part from stores outside the Study Area, particularly Cambridge stores. They also claim that "trade diversion to supermarkets and superstores is generally accepted to be from similar sized and functioning stores as these provide directly comparable goods and compete with each for trade" (para. 8.7).
- 3.31 With regard to comparison trade diversion, the applicants say that the comparison offer at the extended Tesco will be complementary rather than in competition with that of the town centre and will allow the town to compete more effectively with larger surrounding stores and centres.

RTP's analysis of trade draw

- 3.32 In our view, there will not be enough capacity to support either the convenience or comparison floorspace at 2012. Therefore, the proposal will have a much greater impact on existing stores and centres than that claimed by the applicants.
- 3.33 There is no evidence provided for the claim that the convenience goods turnover of the extension will be diverted for the most part from stores outside the Study Area, such as Cambridge stores. There is also no evidence for the claim that trade diversion to supermarkets and superstores will generally be from similar sized and functioning stores – it is widely accepted that new out-of-centre provision can have an impact on existing town centre foodstores. In the recent Tesco appeal regarding Padiham (Burnley Borough Council) the Inspector stated that there is some inevitable overlap with smaller butchers, bakers and the like. The Competition Commission report⁴ also makes clear that large supermarkets compete with town centre foodstores.

⁴ The supply of groceries in the UK market investigation (30th April 2008), Competition Commission

- 3.34 With regard to the Waitrose store, because, as discussed, the store is only slightly overtrading rather than overtrading by £5m as per Table 5, Appendix D, the impact is likely to be considerably greater than the 1% calculated by the applicants. In addition, trade diversion from the Waitrose store is likely to result in a loss of “linked trips” with other town centre shops and services (ie where customers of a store also visit nearby shops and services as part of the same shopping trip). Being out-of-centre, the proposal will not create any new linked trips.
- 3.35 Also, if the assumption that “like affects like” is continually used to justify new out-of-centre floorspace provision, there is a risk that investment in existing town centres will not take place. It cannot be argued that the proposal will in any way enhance existing centres, as required by PPS4 and the Local Plan. In our opinion there is a risk that the new comparison element of the proposal will mean that the store becomes a “one stop shop” and draws trade away from Saffron Walden town centre.

4 SEQUENTIAL ASSESSMENT

Policy requirements for the sequential assessment

- 4.1 EC15.1 of PPS4 states that in considering sequential assessments, local planning authorities should:
- a) ensure that sites are assessed for their availability, suitability and viability.
 - b) ensure that all in-centre options have been thoroughly assessed before less central sites are considered
 - c) ensure that where it has been demonstrated that there are no town centre sites to accommodate a proposed development, preference is given to edge of centre locations which are well connected to the centre by means of easy pedestrian access
 - d) ensure that in considering sites in or on the edge of existing centres, developers and operators have demonstrated flexibility in terms of:
 - i. scale: reducing the floorspace of their development;
 - ii. format: more innovative site layouts and store configurations such as multi-storey developments with smaller footprints;
 - iii. car parking provision; reduced or reconfigured car parking areas; and
 - iv. the scope for disaggregating specific parts of a retail or leisure development, including those which are part of a group of retail or leisure units, onto separate, sequentially preferable, sites. However, local planning authorities should not seek arbitrary sub-division of proposals

Sequential approach by the applicants

- 4.2 GL Hearn on behalf of the applicants set out their sequential assessment in Section 6 of the Retail Assessment. They argue that the sequential approach is not appropriate to this proposal as it is an extension. The Retail Assessment cites PPS6 which does not require retailers to split their floorspace into separate sites where flexibility in format, scale and car parking has been shown; however while PPS6 states this explicitly, it has since been replaced by PPS4.
- 4.3 PPS4 says only that “in considering whether flexibility has been demonstrated ... local planning authorities should take into account any genuine difficulties which the applicant can demonstrate are likely to occur in operating the proposed business model from a sequentially preferable site”. This change in the sequential approach is not dealt with in the Supplementary Retail Statement, which simply states that “this [sequential approach] policy test is unchanged from the previous PPS6 version”.
- 4.4 GL Hearn also cite a Secretary of State decision regarding a Tesco proposal in Ryde and an Inspector’s decision regarding an Asda in Keighley.
- 4.5 Nonetheless, a sequential assessment has been carried out focussing on four sites in Saffron Walden town centre; two “Alternative Premises” where a potentially suitable

building exists and two “Alternative Sites” where a new development could potentially take place.

Alternative Premises

- 4.6 The Alternative Premises considered were both vacant premises – the former Eaden Lilley department store and the former Woolworths site on the High Street. However, we understand that these have both since been occupied and therefore are not available.

Alternative Sites

- 4.7 The first alternative site considered, the Fire Station site, is discounted as too small to accommodate the entire proposal. The applicants acknowledge that in principle the site is large enough to support the convenience element of the store, but consider that doing so would nullify the purpose of the extension – to provide a qualitatively improved offer for their existing customers. Additionally the site is in use as a fire station and no alternative site to house this exists, thus the site is unavailable. Although we would question the assumption that the new floorspace must be accommodated as part of the existing Tesco store, we accept that the unavailability of the site makes this a moot point.
- 4.8 The second site considered, Fairycroft Road car park, is in our view a much more realistic prospect for accommodating the proposal. It is large enough to accommodate the necessary 1,274 sq m (gross) of floorspace, and the Retail Assessment acknowledges that “there is clearly potential for future redevelopment of this site”. The main constraint to redevelopment appears to be the necessity to provide additional parking, the costs of which, the applicants claim, would make any potential scheme financially unviable. We do not consider this possibility has been sufficiently explored to draw this conclusion so confidently, especially in view of the statement expressed in the Retail Assessment that the current owner, Waitrose, “is uniquely placed to explore the necessary creative solutions to ensure this on-going car park provision”. We agree with the assessment that Waitrose’s ownership of the site is a constraint to Tesco redeveloping it, but not that it is an insurmountable one.

RTP’s conclusion on the sequential approach

- 4.9 We question whether the scope of the sequential approach undertaken was sufficient. The applicants have only considered four town centre sites - no sites on the edge of Saffron Walden centre were considered, nor any sites in other nearby centres. Additionally they do not appear to have conducted a thorough search for available premises – many property agents such as Focus are able to conduct detailed searches for premises based on various criteria. While there is no guarantee other sites would have emerged from a search of this type, it would have been a thorough way of establishing all potentially preferable sites to assess.
- 4.10 In our view the Fairycroft Road car park site has been discounted too easily. It is large enough to accommodate the whole proposal yet the possibility of Tesco redeveloping it is discounted. This is because the necessary extra parking provision would make it financially unviable; yet the applicants state that Waitrose “is uniquely placed to explore the necessary

creative solutions to ensure this on-going car park provision". We do not see any reason why, if redevelopment is viable for Waitrose, it is not for Tesco.

5 SUMMARY

5.1 In summary we object to this proposal on the following grounds:

- Tesco have not used realistic expenditure growth rates when calculating available expenditure in the Study Area. They have therefore significantly overestimated expenditure growth.
- It is not clear whether Tesco have allowed for an increase in SFT at the forecast years.
- In our view the Study Area expenditure retention rates for both comparison and convenience goods are already high and there is no scope to increase them.
- Tesco have not used the latest company average sales densities when estimating overtrading. Using the most up to date figures shows that there is little overtrading - in particular the existing Tesco store itself is undertrading and the Waitrose store in Saffron Walden is overtrading only slightly.
- Tesco have not used the latest company average sales densities when estimating the likely turnover of the proposal. They have therefore significantly underestimated turnover.
- Tesco argue that the extension floorspace will only trade at 50% of their average sales densities, but no evidence has been provided to justify this claim.
- Therefore there will not be a quantitative need, at 2012, for either the convenience or comparison elements of the proposal.
- In our view there is already a good level of consumer choice in the Study Area, therefore there is no qualitative need for the proposal. Although the store may be in need of refurbishment, this does not mean that additional floorspace is necessary.
- Due to the lack of quantitative need, the impacts on the town centre generally have been underestimated and the impact on Waitrose store of the increased convenience goods retail space has been underestimated.
- The proposal will result in a loss of linked trips associated with the town centre Waitrose store, and will not create any new linked trips. It will not enhance the town centre as required by PPS4.
- The extended store is likely to become a “one stop shop”, drawing additional trade away from Saffron Walden town centre. It could put investment in the town centre at risk.
- There is a sequentially preferable sites available; the Fairycroft Road car park site. In addition, edge of centre sites and sites in centres other than Saffron Walden should be assessed.