SAINSBURY’S SUPERMARKETS LTD

MILTON KEYNES CORE STRATEGY

MATTER 4: ECONOMY AND TOWN CENTRES
(POLICIES CS 3-4, CS7, CS16-17, TABLES 5.3-5.7)

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1. **Introduction**

**Scope and Purpose**

1.1 This Statement has been prepared on behalf of Sainsbury’s Supermarkets Ltd in relation to Matter 4 (Economy and Town Centres) of the Milton Keynes Core Strategy Development Plan Document. Sainsbury’s is a key investor in Milton Keynes having stores at Witan Gate and Bletchley and is keen to provide further investment within the Borough. In particular, Sainsbury’s is currently preparing a planning application for the creation of a district centre facility at Stantonbury alongside a major investment in new school buildings at Stantonbury Campus.

1.2 This representation should be read in conjunction with previous representations to the Core Strategy made by Sainsbury’s in March 2010 and November 2010.

1.3 The issues that are examined in this Statement reflect the questions of most relevance to Sainsbury’s Supermarkets Ltd asked in the ‘Matters and Issues for the Hearings’ (July 2012). These are considered below.

**Matter 4**

**Issue 4.7 i) taking account of the retail capacity update study (August 2011), does the Core Strategy provide a reasonably robust but flexible policy framework for retail and leisure development?**

1.4 It is evident that the policy framework set out in the Core Strategy was prepared in advance of the completion of the Retail Capacity Update (August 2011). Despite this, the strategy set out in the Core Strategy does broadly reflect the approach recommended in the Retail Capacity Update. This is due to the Retail Capacity Update principally providing an update on baseline assumptions such as population and expenditure data rather than providing a comprehensive updated assessment. Indeed, the same household survey (completed in 2008) has been utilised as part of the update.

1.5 Consequently, the Retail Capacity Update adopts the same approach to the earlier studies. Therefore, our significant concerns with regard to the approach that has been adopted set out in our earlier representations remain valid. We continue to question the robustness of the evidence base in providing a policy framework for retail and leisure development, including the most recent Retail Capacity Update.
1.6 Furthermore, the current Milton Keynes Core Strategy identifies the amount of additional retail floorspace required in Milton Keynes (Table 5.6). It is notable that the floorspace requirements set out in the submitted Core Strategy are based on the 2010 Study and therefore have now been superseded by the Retail Capacity Update. Indeed, for the convenience goods, the Retail Capacity Update now identifies no capacity for further convenience goods floorspace (over and above outstanding commitments). This differs to the Core Strategy (Table 5.6) which identifies convenience capacity of 22,800 sq m by 2026. Consequently, the combination of the Core Strategy and the Capacity Study Update leads to confusion and a lack of clarity in providing a clear policy framework.

1.7 Furthermore, we do not consider that the Core Strategy (particularly given our concerns with the robustness of the evidence base) should be prescriptive in terms of identifying retail floorspace requirement figures for the Borough. We believe the policy framework to be unsound. In compliance with the Regulations, the Core Strategy should be founded on a robust and credible evidence base, even with the publication of the Retail Capacity Update, we do not consider that the proposed policy framework is robust. In addition we consider that paragraphs 1.9 and 5.33 to 5.37 (inclusive) and Policy CS4 of the Core Strategy to be unsound.

1.8 In addition, by including prescriptive retail floorspace requirement figures for the Borough, this does not allow a flexible policy framework for future retail and leisure development. We therefore suggest that the floorspace figures set out at Table 5.6 of the Core Strategy and importantly the Retail Capacity Update are revised in light of our significant concerns with regard to the approach adopted (as reflected in our earlier representations).

**Issue 4.7 ii) is policy approach consistent with national policy?**

1.9 The NPPF (Paragraph 23) makes it clear that it is important that needs for retail uses are met in full.

1.10 The NPPF (paragraph 161) also states that local planning authorities should use evidence base to assess, *inter alia*:

- The needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including retail and leisure development; and

- The capacity of existing centres to accommodate new town centre development.
1.11 In this context, the NPPF is clear in highlighting that when considering the ‘need’ for additional retail floorspace, local planning authorities should take full account of both quantitative and qualitative need. Significantly, the NPPF gives equal weight to both these aspects of need.

1.12 The evidence base that has informed the Core Strategy, including the Retail Study Update, places greater weight on quantitative need with limited assessment being provided on wider qualitative issues. Indeed, unlike the assessment of quantitative need, the Retail Study Update did not specifically provide an updated assessment of the qualitative need for additional floorspace.

1.13 In considering qualitative retail need, the Practice Guidance to PPS4 (which has not been revoked despite the publication of the NPPF) and still provides useful guidance in assessing retail ‘need’, identified the following relevant qualitative factors:

- Deficiencies of ‘gaps’ in existing provision;
- Consumer choice and competition;
- Overtrading, congestion and overcrowding of existing stores;
- Location specific needs such as deprived areas and underserved markets; and
- The quality of existing provision

1.14 The evidence base (including the Retail Capacity Update) fails to fully take into account qualitative issues when assessing the need for additional retail floorspace. Therefore, the need assessment undertaken that has informed the Core Strategy does not reflect national planning policy.

1.15 In addition, whilst the evidence base or Core Strategy fails to assess convenience retail requirements for existing centres / sub-areas (which is a significant failing of the policy approach adopted), in considering future comparison retail floorspace requirements, no assessment of the physical capacity of existing centres to accommodate future growth has been undertaken. As was the case with PPS4, the NPPF highlights that local planning authorities should assess whether existing centres have the capacity to meet any future growth. Given that such an assessment has not been undertaken, it is highly questionable whether the retail strategy proposed is in fact deliverable.
1.16 The key thrust of national planning policy is for local planning authorities to plan positively for sustainable economic development. The approach in the Core Strategy and the recent Retail Capacity Update is one where deficiencies in parts of the Borough are not sought to be addressed. This means that existing unsustainable shopping trips will continue. Such an approach does not reflect the national policy of providing sustainable economic development.

1.17 Overall, we maintain that the Core Strategy fails to provide an appropriate retail strategy in line with guidance in the NPPF. Therefore, the Core Strategy is not consistent with national policy.

**Issue 4.7 iii) is it clear how any existing deficiencies in provision will be addressed?**

1.18 Given that the Retail Capacity Update adopts the same approach to the earlier studies, it remains that neither the Core Strategy nor the evidence base seeks to identify deficiencies in the existing retail offer and importantly how any existing deficiencies will be addressed.

1.19 The approach focuses principally on the Borough as a whole rather than seeking to understand whether there is a deficiency in certain parts of the Borough due to a lack of choice, competition or inadequate provision. As set out in our previous representation (November 2010) the approach adopted is based on a broad-brush approach that focuses on future needs for the Borough as a whole. Critically, the same approach is adopted in the Retail Capacity Update.

1.20 As set out in our previous representations, it cannot be accepted that if a particular store in one part of the Borough is trading strongly due to a lack of competition and choice, that because a store elsewhere is trading below expected levels (for whatever reason) that this will offset a deficiency in this part of the Borough. Different retail destinations within the Borough will serve different catchments and because there is strong retail provision in certain parts of the Borough this should not prevent further retail floorspace being provided elsewhere, particularly where there is likely to be a local deficiency.

1.21 Sainsbury’s strongly believe that there is a deficiency in retail provision within the northern part of Milton Keynes in order to meet the main food shopping requirements of local residents. The approach proposed in the Core Strategy or the Retail Capacity Update does not seek to address this deficiency, rather advocating that any further growth should continue to be directed to existing centres.
1.22 We believe that a better and more appropriate strategy, in line with national planning policy, would be to redirect growth to centres and locations where there is capacity / demand in order to achieve a more sustainable distribution of centres and facilities to serve local needs. The proposed redevelopment of Stantonbury provides such an opportunity.

1.23 Overall, we believe that the Core Strategy fails to provide an appropriate retail strategy that is in accordance with national planning policy. The approach advocated does not seek to identify local deficiencies in provision reflecting the broad brush approach of the evidence base.

**Summary**

1.24 Despite the publication of the Retail Capacity Update since our previous representations, our fundamental concerns.

1.25 We maintain the view that the proposed policy framework for dealing with retail development has not been based on detailed and sound evidence and is inconsistent with national planning policy. We strongly believe that the Core Strategy needs to be revised to reflect these concerns.

1.26 Accordingly, Sainsbury’s proposes the following revisions to the Core Strategy:

**Table 5.5: Retail Hierarchy**

Include Stantonbury as a District Centre within the Retail Hierarchy (please refer to representations in March and November 2010 for justification for this change)

**Paragraph 1.9**

Amended to read: “Currently, there is limited short term requirement for new retail development to support growth in the Borough as a whole. Longer term requirements after 2011 will be focused on Central Milton Keynes, the Centres of Bletchley, Wolverton, Westcroft, Kingston and Stantonbury” (please refer to representations in March and November 2010 for justification for this change)

**Table 5.6: amount of additional retail floorspace required in Milton Keynes and Retail Capacity Update**

Updated to fully take into account quantitative and qualitative issues and a more localised assessment, particularly in considering convenience goods floorspace requirements.

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