

Asda/Uttoxeter
04 February 2020



Kerry Challoner
East Staffordshire Borough Council

Sent via email: dcsupport@eaststaffsbc.gov.uk

Dear Ms Challoner

Planning Application P/2019/01270
Erection of a single storey detached building to form a Class A1 foodstore, together with car parking, landscaping, lighting, fencing and associated works

We write on behalf of Asda Stores Limited to object to the above application for planning permission submitted to East Staffordshire Borough Council ("the Council") by Aldi Stores Limited. Asda respectfully request that the application be refused.

As you will be aware the Asda store in Uttoxeter lies within the Town Centre boundary and was developed in 2014. The store provides an anchor store within the Carters Square shopping centre.

The Local Plan, adopted in 2015, recognised the importance of the Carters Square development to the regeneration of the Town Centre. At paragraph 3.144 it states:

"The Council has previously worked hard to improve the environment within the two town centres adopting plans for both Uttoxeter (Uttoxeter Masterplan 2003) and Burton (Masterplan Part 1 in 2010 and Burton Town Centre Strategic Framework 2012) which set out a range of schemes for different parts of the town centres, many of which have been implemented. In both instances the Council has sought to deliver environmental and public realm improvements whilst also promoting the two towns for inward investment and regeneration opportunities. This has resulted in the redevelopment of the Cattlemarket in Uttoxeter for mixed use development, coming forward for housing and retail use, currently under construction, being anchored by Asda. This will greatly improve the shopping 'offer' in the town centre which was commented as weak in the recent town centre health check."

In order to protect the status and function of the Town Centres within East Staffordshire, Strategic Policy 21 of the Local Plan states that new retail development should '*safeguard the retail character and function of the town centre and not detract from its vitality and viability*'.

We have reviewed the Aldi proposal and its supporting information and have significant concerns regarding the impact levels on the Town Centre therein. The Aldi application site lies outside the defined Town Centre and is above the threshold set out in Policy 21, therefore they have prepared a

retail assessment. However, we have concerns over the methodology used for the retail assessment which we consider results in an underestimation of the impact on this proposal. The reality is that there will be significant adverse impact on the Town Centre, which warrants refusal on the application in line with Policy 21 of the Local Plan.

The concerns are as follows:

The basis of the background information used to support the retail impact assessment is flawed. The applicants rely on the Council's Retail Study from 2013. This may not necessarily be out of date, however there has been significant change in Uttoxeter's retail provision since it was published that the findings therein can no longer be accepted as reliable evidence on which to prepare a retail impact assessment. Since 2013 the Asda and Waitrose stores have opened providing key anchor stores in the Town Centre. In addition, there has been two new Lidl stores opened. Shopping patterns are therefore now different to 2013. The Council need to be content that the supporting information submitted with the planning application is of a sound basis; clearly relying on the 2013 retail study means that this is not the case. We therefore recommend that the Council request that the applicants undertake a new household survey to understand the true trading patterns currently taking place and this can then underpin a thorough and robust retail impact assessment.

The level of impact on the Town Centre has also been underestimated. The trade draw level being shown by the applicants from the Town Centre is 18%, of which 6% is from Waitrose, 11% from Asda. The levels are significantly different to those agreed by the Council when recently assessing the Lidl store proposal where the trade draw was shown as 55% from the Town Centre. The result of this underestimation is that only 4% impact is being shown on the Town Centre, whereas it is expected that the true level of impact will be much higher. Aldi need to be asked to review their trade diversion levels and undertake scenario testing of differing levels.

To conclude Asda have concerns that the retail assessment is underestimating the impact of this proposal. The base data used for the retail assessment is out of date given the changed nature of food retailing in the town. The Council appreciate the importance of the Town Centre, the anchor developments and regeneration investment which has taken place there over the last 5 years. This is evidenced in the policy position set out in the Local Plan. To allow this development to proceed would undermine those policy objectives and have a significant adverse impact on the Town Centre thereby detracting from its vitality and viability. As such we urge the Council to refuse this planning application.

We look forward to receiving confirmation of receipt of this objection.

Yours sincerely

Katherine Sneedan MRTPI
Director