

Caerphilly County Borough Council
Planning Department
FAO: Mrs S Hockaday
Pontllanfraith House
Pontllanfraith
Blackwood
NP12 2YW

10th March 2010

Dear Mrs Hockaday

**PLANNING APPLICATION REFERENCE: 10/0030/FUL
SAINSBURY'S SUPERMARKETS, PONTLLANFRAITH**

I refer to the above application currently before the authority and confirm as Agent for Develica LLP (owners of Blackwood Gate Retail Park) that I would make the following comments and observations, resulting in this submission forming an **objection** to the proposal:

Committee Decision:

Firstly, I request this matter be taken before a planning committee, and not decided by way of Officer's Delegated Powers. I understand there have been sizeable objections from local residents, and this application must therefore, go before elected Members.

Justification for the Car Park Extension:

The Transport Assessment submitted with the planning application (paragraph 2.2.3 pertains) states that:

"WSP received information from the store manager that there were issues with there simply not being enough spaces within the existing car park to allow the number of customers the store was generating to be able to park. This in turn led to vehicles parking along the access road which has subsequently brought about safety issues for motorists trying to enter / exit the store and led to parking restrictions being imposed."

The statement from the store manager appears to be the justification for the provision of an increase in parking provision of c. 34%. I am somewhat surprised WSP have referred to this, when one considers the findings of their own car parking survey. The statement from the store manager conflicts entirely with the tables and surveys contained within the Transport Statement. We quote from this:

"WSP undertook a car park utilisation survey across the three car parking area and the access road on a Saturday, which is believed to be the retail peak. It was determined that a total of 79% of the parking spaces were utilised across the site and that no vehicles were parking on the site access road."

I question WSP's use of the statement that a total of "79% of the parking spaces were utilised across the site". To be clear, I consider that this statement should have read that, "on average, the utilization rate of all the car parks combined was only **57%**". Only at one time during the course of the day (between the hours of 3pm and 4pm and not for the entire duration of that hour) did the utilization rate ever reach 79%. It is more telling that throughout the rest of the day, this figure was substantially lower. For example: between the hours of 10am and 2.45pm, the utilization rate never went over 70% and in the two hour period between 2pm to 4pm the utilization rates were in the main within the lower 70%.

To clarify, we produce our own table below using WSP's figures:

Car Park	Average Utilization Rate from 10am – 4pm
1	72%
2	82%
3	44%
1 + 2 + 3	57%

It appears to me that ample car parking is provided at this store to cater for consumer demand. In all three car parks, only during one, 1 hour period during the normal trading day (and not for the entire hour) did some parts of the car park sees a relatively high occupancy rate. Conversely, during this same period, there are ample spaces elsewhere within the boundary of the site available to cater for the increase. This is all about dispersion and those car parks that see high occupancy levels are those nearest to the store entrance. It simply means some consumers have to park slightly further away and walk.

By way of justification, WSP go on to say in their TS that:

“Although this demonstrated that there is some spare capacity within the car park if the utilisation were to increase to around 90%, (which would be likely given the size and form of extension) its practical operational capacity would be reached and the car park would become less efficient as customers would have to re-circulate in search of spaces. This demonstrates a need for additional car parking.”

I am not convinced about this rather sweeping statement. Indeed, it does rather appear to conflict with the statement made by RPS within their planning application covering letter:

“The development proposals seek the erection of an extension to the store to provide a new customer café providing 185sqm GEA to replace the existing temporary café tent which currently provides 37.8sqm GEA, thus resulting in a net increase of 147.2sqm GEA of ancillary floorspace. The development proposals do not, however, result in a net increase in the existing sales area of the store but instead, seek to improve customer facilities for existing patrons and to bring the store in line with modern supermarket standards.”

The improved customer facilities are for “existing customers” (RPS's choice of words).

I do question whether a net increase of 147.2 sq.m. of café space, not retail space, would result in an increase in utilization of the car park. WSP have not justified why this would be the case (given their own words) “given the size and form of extension”. I certainly see no justification.

WSP further attempt to justify an increase in car parking provision by their statement that:

“WSP also considered the impact of additional trips and the increase in customer dwell time associated with the extension. A detailed review of the TRICS database determined that there is a trend that an increase in store size does create an increase in trips, (although the relationship is not uniform). Given the nature of the extension, (provision of an improved café) it may generate additional diverted trips from the main highway network which will require further car parking spaces.”

Again, I question whether the provision of an improved café would generate additional diverted trips from the main highway network which will require further car parking spaces. I note WSP use the term “may”, not “will”. If this is the case, this to me appears to go entirely against the grain of National and Local Retail Planning Policy, diverting trade away from town, district and local centres. Again their statement contradicts the rationale for the application provided by RPS (for “existing customers”).

From a car parking requirement therefore, I see no justification for allowing this application.

WSP refer to advice and guidance on car parking standards. Fundamentally, one must always remember that these standards are **MAXIMUM** standards, not **MINIMUM**. If a car park operates sufficiently well at an existing level, there should be no requirement to provide more spaces simply to bring the car park up to a certain defined level. This would only be the case if the standards required minimum provision. The existence or car parking standards does not, therefore, justify an increase in parking provision at this site.

The Transport Statement states, quite rightly, that PPW confirms:

"In terms of retail the main objectives are as follows:

- *Secure accessible, efficient, competitive and innovative retail provision for all communities of Wales in both urban and rural areas;*
- *Promote town, district, local and village centres as the most appropriate locations for retailing and for functions complementary to it;*
- *Enhance the vitality, attractiveness and viability of town, district, local and village centres; and*
- *Promote access to these centres by public transport, walking and cycling."*

I am somewhat surprised that WSP have quoted from this particular part of PPW as it appears to do little to assist their case. The main objectives of retail policy do relate to promoting town, district, local and village centres. In addition, the vitality, attractiveness and viability of those centres should be enhanced. However, I must ask the authority to consider how these absolute fundamentals of retail policy can be achieved by allowing a 1/3 increase in the parking provision at this wholly out of centre retail store? They cannot and for this reason the application should be refused.

Local Policy

The site is **not** an allocated retail site within the Approved UDP.

The site is **not** within a town, district, local or village centre.

The site lies wholly and completely out of town and should be treated as such in any planning decisions. The retail offer from the site exists. This is a matter of fact and no doubt the site was purchased on this basis. However, it is also worth remembering the site when purchased was confined and restricted in size and scale. The operators have upgraded the offer. However, whilst upgrading the offer could be seen as beneficial to local residents, providing something over and above what the site can comfortably accommodate, should not follow. There is a limit to the retail floorspace that can be traded from this site. And this should be the case given its out of centre location. In addition, other factors, such as the level of car parking provided and permitted, should also act to restrict further impact on competing town and local centres.

The five retailing objectives of the UDP are:

1. *To maintain, enhance, and develop a hierarchy of shopping centres which meet the needs of all sections of the population.*
2. *To maintain the vitality, viability and character of the County Borough's town centres for the benefit of the community.*
3. *To increase the proportion of residents' retail expenditure spent in the County Borough by encouraging retail growth in the defined retail centres, and by encouraging new retail development on specific sites within or adjacent to the defined retail centres.*
4. *To ensure that out of town retail developments do not undermine the vitality and viability of the existing town centres.*
5. *To encourage, where appropriate, the provision of new local facilities to serve communities where they are deficient.*

The provision of further car parking at this site, does not, in my view, fulfill any of the five retailing objectives given in the Council's own policy document. Indeed, providing more car parking, which in turn is likely to attract more consumers to the site, will in all likelihood, have the opposite affect. It will ensure the site competes entirely with the existing town centres of the County Borough. In addition, permitting further car parking provision goes against the Council's own policy relating to supporting and enhancing Caerphilly's retail hierarchy (Policy 1R and Policy R5 below):

1R

RETAIL CENTRES WILL BE SUPPORTED AND ENHANCED, BASED ON THEIR ROLE WITHIN THE FOLLOWING RETAILING HIERARCHY:

*A SUB-REGIONAL TOWN CENTRES;
B DISTRICT TOWN CENTRES;
C LOCAL CENTRES*

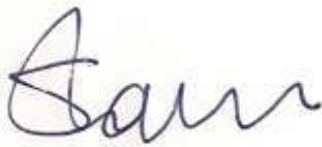
R5

*PROPOSALS FOR NEW LARGE RETAIL STORES IN LOCATIONS OUTSIDE THE TOWN, DISTRICT AND LOCAL CENTRES DEFINED IN POLICIES 1R AND R1 WILL BE CONSIDERED IN ACCORDANCE WITH THE SEQUENTIAL APPROACH, AND WILL NOT BE PERMITTED WHERE:
A THE VITALITY AND VIABILITY OF NEARBY DEFINED TOWN, DISTRICT AND LOCAL CENTRES ARE LIKELY TO BE UNDERMINED, TAKING INTO ACCOUNT THE CUMULATIVE EFFECTS OF OTHER APPROVED RETAIL DEVELOPMENTS, RECENTLY COMPLETED DEVELOPMENTS AND PLAN COMMITMENTS; OR
B THEY WOULD UNDERMINE THE COUNCIL'S RETAIL STRATEGY; OR
C THEY WOULD UNDERMINE A TOWN CENTRE ACTION PLAN*

This application provides the Council and Members the chance to safeguard existing town and local centres by refusing to permit additional car parking provision at an out of centre retail site. Whilst I acknowledge this is not a proposal of a new retail store, by implication any allowance of additional car parking which would, in essence make the current use more attractive to consumers, would be completely at odds with National and Local Retail Policy.

For the above reasons, I ask Officers to recommend refusal, and Members to uphold that recommendation.

Yours sincerely



Shawn J Cullen BSc (Hons) DipTP MRTPI