

Comment

Agent	Mr Gareth Roberts (871308)
Email Address	
Company / Organisation	G R Planning Consultancy Ltd
Address	34 Above Town Dartmouth TQ6 9RG
Consultee	(871310)
Company / Organisation	Mays Properties Ltd
Address	C/O 34 Above Town Dartmouth TQ6 9RG
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mays Properties Ltd ()
Comment ID	LPPub110
Response Date	10/12/14 17:28
Consultation Point	Core Policy 10: Abbey Shopping Centre and the Charter, Abingdon-on-Thames (View)
Status	Submitted
Submission Type	Web
Version	0.1
Q1 Do you consider the Local Plan is Legally Compliant?	No
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

These representations are submitted on behalf of Mays Properties Ltd (MPL). MPL are a family owned and run business with longstanding links to Abingdon established originally through their retail business Mays Carpets which operated from the town (firstly in the town centre and then on Faircares Retail Park (FRP)) for over 70 years. Although that business was sold in June 2005 MPL continue to have significant business interests in Abingdon through their ownership of the whole of the FRP.

Since 2006 they have invested heavily in the retail park and having completed the successful Phase 1 (western part) refurbishment are now looking to progress the redevelopment of Phase 2 (eastern part). MPL's investment has significantly improved the park and brought forward a modern development on this important gateway site. It has also generated new local jobs and enhanced the complementary role it plays to Abingdon Town Centre. MPL have also contributed heavily to the AbiTS scheme which has sought to secure various highway improvements to Marcham Road and the roads leading into the town centre.

MPL largely welcome and support the retail policies and supporting text of the Draft Plan and specifically paragraphs 5.22 and 6.50 which recognise the role and importance of FRP as a popular retail warehouse destination and as an integral part of the overall retail offer of Abingdon. Also, Policy CP32 which seeks to control new retail development (floorspace) outside existing centres including the adoption of a 'local' threshold for the submission of retail impact assessments which MPL consider consistent with paragraphs 23 - 27 of the National Planning Policy Framework (NPPF).

Whilst MPL welcome the improvements that Policy CP10 seeks to bring forward specifically through the provision of a new large foodstore on the Charter Area they note that this is the only retail allocation in the Draft Plan for Abingdon. Even though the Plan covers the period to 2031 and the retail 'evidence base' that underpins it found that there would still be capacity by 2029 for more comparison floorspace (over 4,000 square metres net) beyond the Charter and Abbey Shopping Centre allocations, the Draft Plan remains completely silent on where that 'need' could be met or how Abingdon's market share of comparison spending which is extremely poor could be improved.

The 'evidence base' is provided by the Vale of White Horse District Council: Retail & Town Centre Study March 2013 (Retail Study). However, the Retail Study's recommendations on future capacity are based on Abingdon maintaining constant market shares. In accord with the NPPF both the Retail Study and the Draft Plan should provide for all future growth and seek to pro-actively improve the poor level of comparison spend retention within Abingdon.

Whilst the proposed foodstore on the Charter Area would be a welcome investment the Retail Study confirms that Abingdon already has an extremely high level of retention on convenience spend. The quantitative and qualitative 'need' is therefore far more pressing on the comparison side in that increasing Abingdon's market share in this respect would bring with it other benefits such as reducing the distance shopper's travel to undertake a comparison shop, generating new jobs and associated spin-off's.

MPL are firmly of the view that both the Retail Study and the Draft Plan are in these respects 'unsound' and are not compliant with the NPPF. They must look in more detail at the potential development opportunities for meeting the capacity for over 4,000 square metres net of comparison floorspace within Abingdon and how these opportunities could improve Abingdon's poor retention level of comparison spend.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant

or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As both the Retail Study and the Draft Plan are 'unsound' and are not compliant with the NPPF, they must look in more detail at the potential development opportunities for meeting the capacity for over 4,000 square metres net of comparison floorspace within Abingdon (to 2031) and how these opportunities could improve Abingdon's poor retention level of comparison spend. This could take the form of an amendment to Policy CP12 or a new Policy in the Abingdon Sub-Area Strategy section, which either identifies potential opportunities (sites) or provides a criteria based approach for considering sites that may come forward during the Plan period.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The ability of Abingdon to meet both existing and future retail requirements is of significant importance to the overall planning of the town and its future success. Improving the level of retention of comparison spend will bring with it significant new investment and jobs and lead to a significant reduction in car travel or trips that are currently being made by Abingdon's residents to competing centres