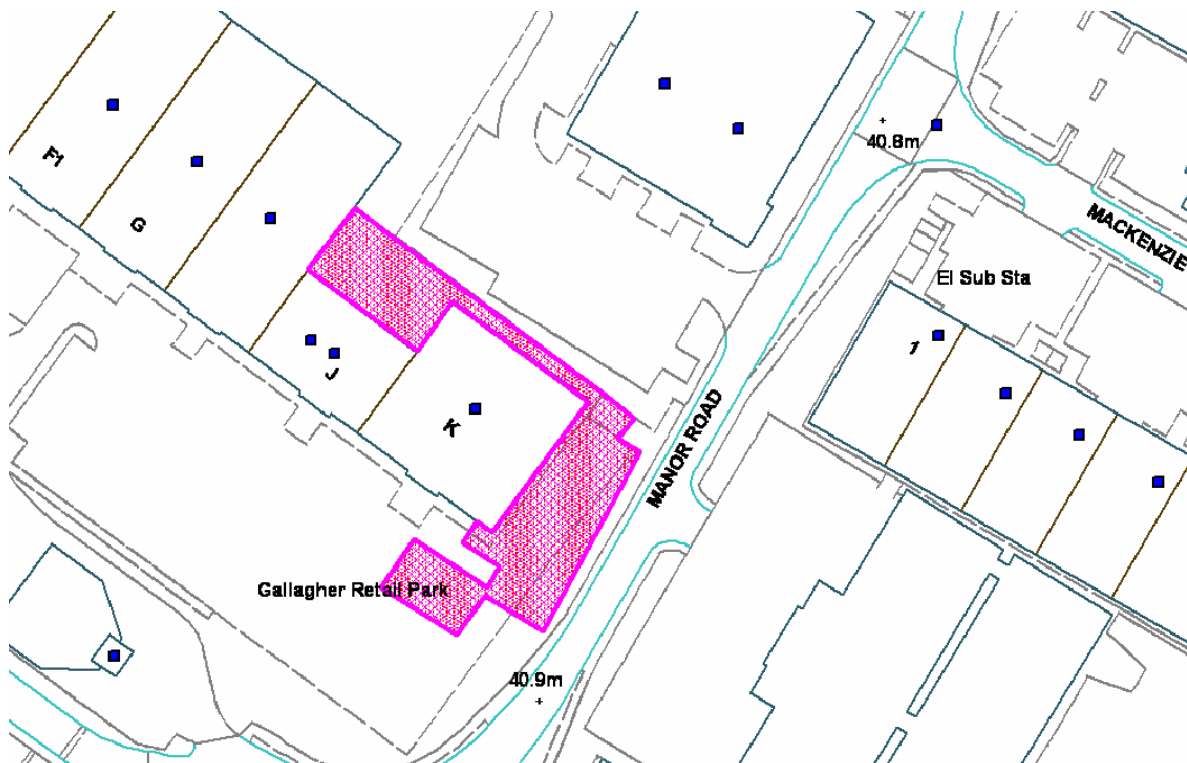


<b>APPLICATION NO:</b> 14/00523/FUL	<b>OFFICER:</b> Mrs Emma Pickernell
<b>DATE REGISTERED:</b> 26th March 2014	<b>DATE OF EXPIRY:</b> 21st May 2014
<b>WARD:</b> Swindon Village	<b>PARISH:</b> Swindon
<b>APPLICANT:</b>	The Gibraltar Limited Partnership
<b>AGENT:</b>	Paul Kentish and Co
<b>LOCATION:</b>	Gallagher Retail Park, Tewkesbury Road, Cheltenham
<b>PROPOSAL:</b>	Proposed erection of retail warehouse unit on car parking adjacent to Unit K Gallagher Retail Park

**RECOMMENDATION:** Permit



This site map is for reference purposes only. OS Crown Copyright. All rights reserved Cheltenham Borough Council 100024384 2007

## 1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 The application site comprises an area of land within the Gallagher Retail Park, adjacent to unit K which is currently in use as Carpet Right but which has consent to be converted into several smaller units to be used as a café, bakery etc. The site currently contains 18 parking spaces and is separated from Manor Road by a landscaped verge.
- 1.2 This application proposes to construct an additional retail unit to the end of this row. This is intended to be used by Majestic Wine. Elevationally, this would follow the form and materials of the reconfigured adjacent units. A service area would be provided at the rear and a click and collect area would be provided at the front. The cycle parking would be relocated to the frontage
- 1.3 This application comes before committee due to an objection from the Parish Council.

## 2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

### Constraints

Landfill Sites boundary

### Relevant Planning History

**91/00319/PF 25th April 1991 PER**

Application to Vary Conditions Vi and Viii of Planning Permission T 198/1/X Dated 16th June 1989

**91/00830/AI 26th September 1991 PER**

Display of Illuminated And Non-Illuminated Advertisements

**91/01148/AN 19th December 1991 REF**

Erection of Hoarding

**92/00051/PF 27th February 1992 PER**

Construction of 4.5 Metre High Boundary Fencing To Proposed Retail Park

**93/00167/AI 25th March 1993 PER**

Display of Various Illuminated Signs

**94/00865/PM 20th October 1994 PER**

Reserved Matters Application (External Appearance, Siting, Design, Means Of Access And Landscaping) For Non Food Retail Units, Car Park And Service Area

**99/50303/CONDIT 28th June 2000 PER**

Variation of Condition iv of Permission 16 June 1989 to extend the range of goods sold at 1 unit (975 sq.m). to include the sale of pharmaceuticals, health and beauty, childrens, photographic, health foods and ancillary chemists products

**05/00225/FUL 6th April 2005 NOTREQ**

Provision of steel barriers to three entrances and bollards to lowered kerb pedestrian access

**06/00899/ADV 2nd August 2006 WDN**

Free-standing, externally illuminated (static) retail park identification totem and free-standing, externally illuminated (static) retail park identification banners

**06/01273/ADV 10th October 2006 REF**

Free-standing, internally illuminated (Static) retail park identification totems, free-standing, externally illuminated (static) retail park identification banners

**07/01381/ADV 29th November 2007 REF**

Display of five lamp post mounted 6 sheet illuminated advertisements

**08/01287/FUL 7th November 2008 PER**

To construct a brick built outbuilding to store an electricity meter

**09/00596/CONDIT 23rd June 2009 REF**

Application to vary condition 6 attached to planning permission CB19773/00 to allow the sale of footwear

**11/00550/CLPUD 15th June 2011 CERTPU**

Amalgamation of Units M(2) and N(1) into one Class A1 unrestricted retail unit

**91/01333/PF 12th March 1991 PER**

Alteration to existing car park and service yard.

**91/01334/PF 12th March 1991 PER**

Retail park with non-food retail stores, petrol filling station, car parking, service yards, access road and ancillary facilities.

**90/01379/PF 18th December 1990 PER**

Construction of access road and junction/highway improvements to A4019

**89/01658/PF 16th June 1989 PER**

Outline application for the erection of non food retail store on the form of a retail park including parking, service yards, access roads, landscaping, petrol filling station and ancillary facilities.

**82/00684/PF 23rd December 1982 PER**

Erection of a detached garage for storage purposes

**13/02107/FUL 20th January 2014 PER**

Provision of new electricity sub station within existing service yard

### **3. POLICIES AND GUIDANCE**

#### Adopted Local Plan Policies

CP 1 Sustainable development

CP 2 Sequential approach to location of development

CP 4 Safe and sustainable living

CP 5 Sustainable transport

CP 7 Design

RT 1 Location of retail development

RT 7 Retail development in out of centre locations

TP 1 Development and highway safety

TP 2 Highway Standards

TP 3 Servicing of shopping facilities

TP 6 Parking provision in development

#### National Guidance

National Planning Policy Framework

## 4. CONSULTATIONS

### **GCC Highways Planning Liaison Officer**

*28th April 2014*

I refer to the above planning application received on with Plan(s) Nos: AAA4817\_P17-001, AAA4817-P17-002, AAA4817-P17-003 and AAA4817-P17-004, AAA4817-P17-005 and Transport Statement Dated March 2014.

The proposed development is for the erection of a retail unit comprising of a ground floor area of 279msq within a well established local retail park. The proposed development would not normally be required to be supported by a Transport statement/Assessment based on the DfT Guidance on Transport Assessment due to the proposed ground floor area being less than 800sqm which was the recommended threshold. That said, I note the proposed development will result in the loss of car parking in a busy retail park and I consider that the Transport Statement submitted is adequate to assess the impact of the proposed development on the adjacent highway network.

The existing retail park provides safe and suitable access to the adjacent highway and is considered to be in an accessible location and therefore the principle of the proposed development is considered acceptable. In accordance with the National Planning Policy Framework (NPPF) the proposed development is required to demonstrate that safe and suitable access is provided and that the residual cumulative impact of the proposed development is not severe. The scope of the transport statement covers all of the elements considered by the highway authority to be pertinent to the application.

The proposed unit will be sited adjacent to the existing unit known as K over an existing customer retail parking area. The retail park currently has 493 parking spaces for the public excluding 27 additional parking spaces for staff. The proposed development will result in a loss of 16 car parking spaces and independent car parking surveys were undertaken during the peak period use on a Friday and Saturday to determine the current level of usage. The surveys are to demonstrate that the proposed development would not remove required parking or displace parking onto the adjacent highway to detriment of highway safety.

The surveys were undertaken on the 17th and 18th January between the hours of 08:00am and 21:00pm and the results are shown in Table 2.2 of the submitted Transport Assessment. The surveys show that there is more than adequate spare capacity during average peak shopping periods. It is not considered reasonable for peak holiday periods to be used such as Christmas or Bank Holidays as all retail uses are busier than normal during these periods and higher levels of use are to be expected. I note that the Transport Statement refers to dated parking policy but this does not alter my assessment of the application or the conclusion drawn by the applicants transport consultant and I am satisfied that the loss of car parking will not materially displace parking or cause harm to the adjacent highway network. All access and servicing requirements will remain as the existing situation with goods transported to the rear of store via trolley cages.

The transport assessment also assesses the likely vehicle trip generation from the proposed development and whilst no vehicle trip generation data has been submitted I do not draw a different conclusion from that of the transport consultant. The Transport Statement makes reference to linked trips from potential customers visiting other stores within the retail park and whilst this is not unreasonable I do not consider that it is appropriate to base the assessment on a food retail use extension.

In order to undertake a more robust assessment I have undertaken a trip rate analysis of the proposed extension using the TRICS database (The national standard for trip rate analysis) without any adjustment for linked or bypass trips and the proposed development

could generate an average of 15 trips during a peak hour. Given the size and trip generation already occurring from the retail park with a ground floor area of 18,018sqm I do not consider that 15 vehicle trips from an additional 279sqm of retail space would have a severe impact on the adjacent highway network given an increase of only 1.5% in the total traffic movements and not applying any discount for linked/pass by trips.

I am satisfied that the proposed development provides safe and suitable access and that the residual cumulative impact is not severe in accordance with Paragraph 32 of the NPPF.

I recommend that no highway objection be raised subject to the following condition(s) being attached to any permission granted:-

The development hereby permitted shall not be occupied until the cycle storage facilities have been made available for use in accordance with the submitted plan AAA4817-P17-005 and those facilities shall be maintained for the duration of the development.

Reason:- To ensure that adequate cycle parking is provided and to promote cycle

**Parish Council**

*13th April 2014*

The Parish Council wishes to object to the proposal on the basis that traffic congestion is already severe on the site and the surrounding roads. The existing infrastructure appears to be at its limit. The introduction of another retail unit together with the loss of some car parking spaces will only exacerbate the problems.

**Building Control**

*4th April 2014*

No comment.

**Contaminated Land Officer**

*3rd April 2014*

No comment.

## 5. PUBLICITY AND REPRESENTATIONS

Number of letters sent	7
Total comments received	0
Number of objections	0
Number of supporting	0
General comment	0

- 5.1 The application was publicised by way of letters to 7 nearby properties and a site notice. No representations have been received.

## **6. OFFICER COMMENTS**

### **6.1 Determining Issues**

The key issues in determining this application area considered to be (i) the principle, (ii) visual impact, (iii) impact on neighbouring properties, (iv) highways and parking.

### **6.2 The site and its context**

The site is within an existing retail park which is characterised by large retail warehouses. The recent consent allows for some of the larger units to be subdivided into smaller units and used more flexibly.

### **6.3 Principle**

Policy RT7 of the Local Plan states that retail development outside defined shopping areas will be permitted only where a need for additional floorspace has been demonstrated and that the proposals do not harm the vitality or viability of the town centre.

The application was accompanied by a report from the applicant, addressing these points and this has been assessed by an independent consultant, who has produced a brief report which will be made available for members in full.

The agent has been unable to confirm Majestic's intention for their town centre store in Winchcombe Street, as such the report have been prepared with the 'worst case scenario' in mind; i.e. that the town centre store is vacated by majestic.

The report confirms that the range of policy considerations outlined in the application documents is appropriate. It confirms that the sequential test has been correctly carried out and agrees with its findings that there are no appropriate alternative, available sites which meet the needs of majestic wine in terms of floorspace or parking availability. The size of the proposed unit at 279 sqm is significantly below that at which a retail impact assessment would be required (2,500sqm). However it is still important that on the vitality and viability of the centre is fully considered as a material planning consideration. Whether the existing Majestic Wine on Winchcombe Street is to remain or not, given the small scale nature of the proposal it would not have a significant adverse impact upon the town centre, or any other centres. Therefore the report concludes that there is no retail planning reason for opposing the development. As such the principle is considered to be acceptable.

### **6.4 Design and layout**

The design is considered to be appropriate; it is essentially a continuation of the existing building with the material and signage zones to match those of the adjacent building. Although the building projects into the open area to the side of the building it would not be overly prominent in the street scene and is still set back approx 9m from the road retaining the highway verge as a buffer to the development. As such the proposal meets the requirements of policy CP7 of the Adopted Local Plan.

### **6.5 Impact on neighbouring property**

The building is surrounded by commercial development and therefore has no residential neighbours. It is not considered to result in any adverse impact upon neighbouring uses or properties. As such the application is in accordance with policy CP4 of the Local Plan.

## **6.6 Access and highway issues**

The Parish Council has expressed concerns that the proposal would result in congestion and results in the loss of parking spaces. The application was accompanied by a transport statement which has been assessed by highways. The comments of the officer are reproduced above and confirm that they have no objection to the proposals. Therefore subject to the provision of the cycle parking the proposal is considered to be acceptable from highways and parking point of view and is therefore in accordance with policies TP 1 (Development and highway safety) and TP 6 (Parking provision in development) of the Local Plan.

## **7. CONCLUSION AND RECOMMENDATION**

- 7.1 For the reasons outlined above the application is considered to be acceptable and is therefore recommended for approval subject to the following conditions.

## **8. CONDITIONS / INFORMATIVES**

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.  
Reason: To accord with the provisions of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.
- 2 The development hereby permitted shall be carried out in accordance with drawing numbers AAA4617-P17-003, 005, 007, 009 and 012 received 25/3/14.  
Reason: To ensure the development is carried out in strict accordance with the approved drawings.
- 3 The retail unit, the subject of this permission shall be used for the sale of wine and/or spirits by the case and/or multi-packs of other beverages, and/or the sale of carpets, furniture, electrical goods, DIY maintenance and improvements for the home, garden and car and for the sale of ancillary goods which are part of the usual product mix of retailers of the foregoing and for no other purpose in Class A1 of Part A of the Schedule to the Town and Country Planning (Use Classes) Order 1987 or in any provision equivalent to that Class in any statutory instrument revoking and/or re-enacting that order with or without modification).  
Reason: To ensure that the sale of goods at this site does not harm the integrity of the town centre in accordance with the expectations of Local Plan Policy RT1 and Section 2 of the National Planning Policy Framework 2012.
- 4 The cycle parking provision shown on the approved plans shall be completed prior to the first occupation of the development and thereafter kept free of obstruction and available for the parking of cycles only.  
Reason: To ensure adequate provision and availability of cycle parking in accordance with Local Plan Policy TP6 relating to parking provision in development.

## **INFORMATIVES**

- 1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2012 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to

dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.



Please Reply to: Swindon  
Our Ref: DAM/dm/NB  
Your Ref:  
Date: 6<sup>th</sup> June 2014



Ms Emma Pickernell  
Cheltenham Borough Council  
Municipal Offices,  
Promenade,  
Cheltenham  
GL50 9SA

## BY EMAIL & POST

Dear Emma

### **Application 14/00523/FUL - Land adjacent to Unit K Gallagher Retail Park**

I refer to your request for advice on the afore-mentioned application. The application is for the erection of a retail warehouse which would have a gross internal floorspace of 279 sq m and the intended retailer is named as Majestic Wine plc. As a fall back position, permission is also sought for the sale of goods permitted under the 1991 permission. Planning permission has been granted for the reconfiguration of the adjacent units building frontages and the design of the proposal would match this.

Majestic Wine sells wine, beer and soft drinks in bulk and imposes a minimum purchase of 6 bottles of wine and spirits. Beer is sold only in multi-packs. The company has some 260 stores in the UK. The nearest are at 68 Winchcombe St, Cheltenham and the Westgate Retail Park Gloucester. The proposed unit would be slightly larger than the Winchcombe St store. It is not clear whether the proposal is a relocation of this outlet or to be operated in addition to it. This has implications for both the sequential test and retail impact. We will assess the application on the basis that the existing store would be closed as the worst case scenario.

The Gallagher Retail Park has some 11,966 sq m of ground floor retail space and 6052 sq m of mezzanine floorspace according to the applicant's agent. The retail park was, according to the applicant's agent (PK) built under a 1989 planning permission and was originally subject to a condition limiting the sale of carpets, furniture, electrical goods and DIY goods. The condition was amended in 1991 to include the sale of ancillary goods which are normally

Cont/d...

Development Planning &  
Design Services Group Ltd  
Group Managing Director:  
L. M. Durrant, FRICS, Dip TP, MRTPI, MinstD  
Company Secretary:  
J. James, BSc (Econ), FCA  
Company Registration N° 1907209  
Registered in England and Wales

Subsidiary Companies:  
Development Planning &  
Design Services Ltd  
Directors:  
L. M. Durrant, FRICS, Dip TP, MRTPI, MinstD  
N. Arbon, BA (Hons), Dip TP, MRTPI  
Associate Directors:  
C. Lindley, BA (Hons), MSC, MRTPI  
K. Pilegar, BSc, MSc, MRTPI  
M. Simpson, BPLAN, MNZPI  
S. Whitfield, BA (Hons), Dip TP, MRTPI  
Consultants:  
M. Crofts, BSc (Hons), Dip TP, MRTPI  
T. A. Gashé, BA (Hons), MA, MRTPI  
D. McCallum, BA (Hons), MPhil, MRTPI  
Company Registration N° 2931708  
Registered in England and Wales

DPDS Architecture Ltd  
Directors:  
L. M. Durrant, FRICS, Dip TP, MRTPI, MinstD  
N. Henham, BA (Hons), Dip Architect, RIBA  
Consultant:  
P. M. Griffiths, BSc (Hons), CMLU  
Company Registration N° 2937191  
Registered in England and Wales

Registered Office of All Companies:  
Old Bank House,  
5, Devizes Road, Old Town,  
Swindon, Wiltshire, SN1 4BJ.  
[www.dpds.co.uk](http://www.dpds.co.uk)

Swindon  
Old Bank House  
5 Devizes Road  
Old Town Swindon  
Wiltshire SN1 4BJ  
Tel: 01793 - 610222  
Fax: 01793 - 512436  
E: [dpds.swindon@dpds.co.uk](mailto:dpds.swindon@dpds.co.uk)

Derby  
3 Gleneagles House  
Vernon Gate  
Derby  
DE1 1UP  
Tel: 01332 - 206222  
Fax: 01332 - 206012  
E: [dpds.central@dpds.co.uk](mailto:dpds.central@dpds.co.uk)



Ms Emma Pickernell  
Cheltenham Borough Council

sold as part of the product mix of retailers of these goods. Over the years the conditions have been varied on individual units, and the Retail Park now includes a variety of retailers including Next, Boots, and BHS Home. Permissions were granted to allow the subdivision of Unit J and its use as for Class A2 and A3 uses. We are familiar with the circumstances of many of the applications to vary the goods sold and note that there have been particular circumstances for varying the conditions in each case.

The applicant states that the proposed unit would be subject a condition similar to the 1991 permission but extended to include the sale of wine, beers and spirits in bulk.

This letter considers the retail planning aspects of the development only and in preparing this advice we have examined the application documents. It considers in particular the agent's covering letter dated 21<sup>st</sup> March and the document headed appendix B.

## **Planning Policy**

### **National Planning Policy Framework**

We consider that PK has correctly identified the main policy documents and policies with regard to the retail policies. It lays great stress on the positive planning aspects of national advice and the presumption in favour of sustainable development. While not disputing the importance of this advice, we note that the key advice is para. 14 of the NPPF which sets out that for decision making, planning permission should be granted where the development plan is absent silent or relevant policies are out of date unless the adverse impacts of doing so significantly outweigh the benefits when assessed against the policies of the NPPF as a whole or specific policies in the NPPF indicate development should be restricted.

The key paragraphs in relation to determining planning applications for retail development are para 24, which sets out the sequential test, para 26 which sets out the impact test and para 27 which states that applications which fail either of these tests should be refused. Para 26 sets a default threshold for impact tests of 2500 sq m unless there is a locally set one.

PK notes that new Planning Practice Guidance was issued on March 6<sup>th</sup> and states that this does not alter the key guidance on how LPAs and applicants

cont/d...

Ms Emma Pickernell  
Cheltenham Borough Council

should approach retail proposals. We will have regard to this guidance should issues of how to implement the NPPF arise.

### **Cheltenham Local Plan 2<sup>nd</sup> Review 2006**

The Gallagher Retail Park is not an identified centre in the local plan and the development is therefore out-of-centre. The most relevant policy is RT7 for retail development in out of centre locations. This policy states that subject to policy RT1 retail development outside of defined shopping areas will only be permitted where the need for the development has been demonstrated and the development, individually or in conjunction with other completed and permitted retail development would not harm the vitality and viability of centres. Policy RT1 sets out the sequential test. Out-of-centre sites are the least preferable, and should be accessible by a regular choice of means of transport. Developers are expected to demonstrate flexibility and realism in format, design, scale and car parking. Both policies were “saved”.

PK comments that very little weight should be given to the needs limb of policy RT7 as it is not consistent with the NPPF (or its predecessor PPS4). We agree. Other than in that respect, the policies are in accordance with the NPPF and the planning application should be determined in accordance with the Local Plan 2<sup>nd</sup> Review unless material considerations indicate otherwise. The key issues for retail planning policy are therefore the sequential and impact tests and PK has addressed both of these.

### **The Sequential Test**

PK sets the parameter for the site search as a 279 sq m of floorspace, adjacent car parking and appropriate servicing. The “Dundee” judgement, referred to by PK, establishes that the suitability of more central opportunities should be assessed against the retailer’s need and not some general or hypothetical need. It equally stresses the need for flexibility in the retailer. PK gives Majestic Wine’s general requirement for a store of between 2,000 and 5,000 sq ft (186 - .463 sq m.). It is reasonable to assume that the particular requirement in Cheltenham is above this minimum size. It is arguable that more flexibility should have shown in the size of unit as a search criterion, but the significance of this can only be judged in relation to the actual opportunities in the centre. With the bulk of the minimum purchases, it is reasonable that convenient car parking is necessary.

The sites are assessed in Appendix B to the letter.  
cont/d...

Ms Emma Pickernell  
Cheltenham Borough Council

In relation to the City Centre, PK has assessed the recognised development sites; viz land to the north of the Beechwood Arcade, Royal Well, North Place, and the St James and Grovesnor St Car Parks. We agree that none are sufficiently advanced to be considered as practical alternatives, or in the case of North Place, no longer available.

In relation to Lower High Street redevelopment site, adjacent to the Brewery development, PK claim that it will not be available in a reasonable period of time, and that the majority of floorspace is taken up accommodating occupiers of the existing buildings. This appears to be rather weak, but nevertheless we accept that there would be no car parking close enough to the development bearing in mind the company's bulk sales.

PK identify a number of vacant units in the High Street Area which are mostly rejected as too small at ground level while including upper level floorspace, and lacking adjacent parking. Empty units in the Brewery development are considered as too large and not being offered on the basis of subdivision. Vacant units in the West End area of the High Street are rejected as too small and with insufficient footfall. The "Haines and Strange" site is considered as part of the land North of Beechwood and it is noted that current proposals include proposals for 6 retail units with a total floorspace of 259 sq m.

If the units were amalgamated this would in our view be near enough the floorspace sought, although it may be true that the developer would not consider that option. PK has also commented that the units cannot be amalgamated because access to the flats above is halfway along the frontage, restricting the biggest unit to half that size.

With regard to the district centres, PK claims that there are no vacant units in Bath Road or the Caernarvon Road district centres. In relation to Coronation Square PK analyses the vacant units and comments that the largest unit that could be provided by amalgamation would be 173 sq m. In the context of the unit size sought it is considered that this would be requiring unreasonable flexibility.

There remains the consideration of Coronation Square as a redevelopment opportunity. Although there have been proposals in the past, there are, as far as we are aware, no current proposals being progressed here which would be available in a reasonable period of time.

cont/d...

Ms Emma Pickernell  
Cheltenham Borough Council

We agree that the out-of-centre unit which is vacant, Cotswold Fabrics, is not significantly better connected to the town centre than the application site. It is not within a convenient walking distance and there is no material difference in accessibility by public transport or car.

We therefore conclude, subject to the clarification of Majestic Wine's intention with regard to its Winchcombe Street outlet, the sequential test is met.

### **Retail Impact**

#### **Vitality and Viability**

Para 26 of the NPPF states that impact assessments should be required for retail proposals over a locally set threshold, or in the absence of such a threshold, over 2500 sq m. PK notes that there is no locally set threshold at present at that the proposed threshold in the JCS is, for Cheltenham, 2,500 sq m. proposal is, at 279 sq m, well below the threshold set for retail impact assessments. The impact on the vitality and viability of the centre remains a material consideration, but it is manifestly true that because of the scale, the proposal's impact on the town centre would be immaterial. This remains true even if the Majestic Wine unit on Winchcombe St were closed as a result of this proposal - it could not be said that the adverse impact on the centre would be significant.

There is the question of the impact of the proposal on the vitality and viability of Coronation Square, which is relatively near and cannot be considered vibrant.

Coronation Square is however, a local centre and its catchment area is limited. Those using the centre at present for alcohol purchases do so out of convenience and are unlikely to alter that pattern. More extensive ranges of wines and beers etc are already available to them at the existing foodstores, including the Sainsbury store adjacent to the application site. We therefore conclude that there is likely to be trade diversion from Coronation Square.

### **Investment**

PK does assess the impact on the proposed investment in these centres in Section B of Appendix B. In relation to the Central Area sites, PK claims that Royal Wells, St James Car Park and Grovesnor St Car Parks are not far  
cont/d...

Ms Emma Pickernell  
Cheltenham Borough Council

enough advanced to represent investment intentions and we agree. Investment in North Place is already committed, and the development of the Haines and Strange site is not dependent on the retail element of the development.

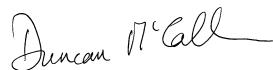
PK comments that the scheme adjacent to the Brewery is some years away from completion and that the majority of the retail floorspace is earmarked for two existing tenants. The timing will however, depend on the negotiations with existing tenants and the term of their leases, but the scheme has already been in preparation for some years and, in the absence of evidence to the contrary it is likely that property negotiations are well advanced. However, it is a mixed scheme, not greatly dependant on retail pre-lets and it is highly unlikely that the intended investment would be jeopardised by a single retailer.

In relation to of Coronation Square, we do not consider that there are current proposals for its regeneration which are far enough advanced to be considered in this context.

### **Conclusions**

We therefore conclude that there are no suitable sequentially preferable sites available in the proposals catchment area, that the proposal would not significantly adversely affect the vitality and viability of any centres and that it is very unlikely to affect investment decisions on current regeneration and redevelopment proposals in the centres. This conclusion is based on the worst case scenario that Majestic Wine would vacate its exiting premises. There are therefore no retail planning reasons for opposing the development.

Yours sincerely

A handwritten signature in black ink that reads 'Duncan McCallum'.

**Duncan McCallum**  
Consultant  
**DPDS Consulting Group**  
dmccallum@dpds.co.uk

Enc: