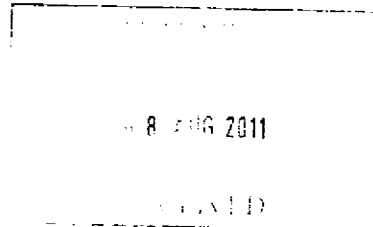


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## **NLP ASSESSMENT OF TESCO PROPOSALS AT BROADWATER ROAD**

I write in respect of the Nathaniel Lichfield and Partners review of the foodstore element of the proposed regeneration of Broadwater Road West. In particular, they have reviewed and commented on the findings of DP9's PPS 4 Assessment. We are delighted that NLP agree with us on the crucial issues around retail impact, which area as follows:-

- The proposed store meets the sequential test, meaning that there are no more suitable town centre sites [section 5.13]
- The store poses no serious threat to Sainsburys, Waitrose, Marks & Spencer and Iceland in Welwyn Garden City Centre [section 3.22] or the Asda in Hatfield [section 3.23]
- The proposed store does not threaten the Somerfield, One-Stop or other local convenience stores [section 3.25].

Therefore, the application proposal satisfies all relevant tests in PPS4, in terms of impact on existing and proposed town centre facilities.

Notwithstanding the above, we have some concerns regarding their analysis of the proposal, particularly in terms of linked trips, job creation the schemes effect on the existing Morrison's at Black Fan Road. I address these and other issues below.

### **Linked Trips and Edge of Centre Status of Site**

As an overarching comment, they have looked at the Tesco element of the proposal in isolation, giving no regard to the residential, office, leisure and most importantly bridge enhancement elements of the scheme. As a consequence, their views on whether the site is edge of centre or out of centre, along with the amount of linked trips generated, need to be treated with caution.

Contrary to NLP's view, we feel that the comprehensive redevelopment proposed will generate significant linked trips. Indeed NLP estimate (without factoring in the bridge improvements) that there will be net increase of 58,000 linked trips; we would expect their estimate to be revised upwards once the replacement bridge works are factored in.

Furthermore, there is no recognition of the fact that the proposed store will generate 60% of its trade through diversion from existing out of centre supermarkets. At present those people



shopping at Morrison's and Tesco Olding's corner make no linked trips to the town centre, by attracting customers back to the town centre, the propensity for linked trips is significantly enhanced.

Further to the above, NLP state at paragraph 4.17 that the site is out of centre as the site is "not well connected" to the town centre. As these comments seem to have been made without consideration of the existing substandard element of the pedestrian footbridge being replaced (including lifts where there are currently only steps), we question their veracity. Indeed, the replacement works to the bridge will make the Tesco site genuinely edge of centre, within 300 metres of the heart of the Howard Centre.

We would urge you to seek clarification from NLP on how the proposed replacement bridge affects their view on these two issues.

### **Impact on Morrison's**

Both Dp9 and NLP agree that there will be a noticeable impact on the existing Morrison's on Black Fan Road (26% and 29%) respectively. It should be clearly highlighted that the Morrison's store is entirely out of centre and has no planning policy protection. As such any effect on its trade should not be a material planning consideration for the Council in determining this application. Notwithstanding this, NLP have suggested a scenario in which the store could close as a result of trade diversion. We strongly question the validity of this statement and would welcome NLP providing further evidence to back up this claim.

Whilst trading below company average is not desirable, it should be recognised that this can still be at a profitable level. Our view has been reinforced by Morrison's, who have stated in the Welwyn Hatfield Times (13/06/11) that even with the application proposal, the store will "absolutely remain open". It should also be noted that despite the application having been in the public domain for nearly a year, no objection has been submitted by Morrison's.

### **Job Creation**

It is estimated by the applicant that the Tesco element of the regeneration proposal will generate 400 jobs from the store alone, with the other uses (leisure, offices, cafes/restaurants, car home, doctors surgery, hotel and YMCA) generating up to 1,000 permanent jobs. This is in addition to the many hundreds of jobs created during the construction period for the overall development.

In light of the above, we are perplexed by NLP's assertion at 3.68 that there may only be a net increase in jobs of 50 to 60 for the store and their failure to acknowledge the other employment generated through the wider regeneration of the site, particularly the development that is committed to in phase one of the scheme. There appears to be no empirical or other evidence to substantiate the claim and it is not clear if this relates to the possible closure of Morrison's (which has already been ruled out by the occupier of the site), or for some other reason. Accordingly, we would appreciate precise clarification from NLP on how they have come to the job creation figures in their report.

There is an assertion in 3.67 that a reduction in trade leads to a reduction in employees; however this appears to be a circumstantial point as opposed to one backed up by any evidence. Furthermore, paragraph 3.68 states that as 86% of the turnover of the store will be diverted from existing facilities, the net increase in jobs will be lower than Tesco forecasts. This fails to recognise that some 40% of the turnover will be diverted from the existing Tesco in at Oldings



Corner, Hatfield, which is significantly overtrading. Tesco are expanding, not downsizing, therefore there will be no loss of jobs from that transfer of custom. In addition, Tesco have pledged to source workers from local unemployed people via the Regeneration Partnership with JobCentre Plus and the YMCA, a pledge that can be guaranteed through its inclusion in any S106 legal agreement. These will be entirely new jobs created within the borough.

### **Impact on Shopping Trips and Car Use**

NLP state in paragraph 3.73 that as 60% of the trade will be diverted from out of centre stores, as most of these are car borne, the majority of trips to the proposed Tesco are also likely to be car borne.

This seems a simplistic conclusion, the trips to Tesco Hatfield and Morrison's have to be car borne as they are out of town, with very poor accessibility by bus, train, cycle or walking. The application site is immediately adjacent to the town centre, railway station, regular bus routes and along a dedicated cycle route, meaning that people could choose to move from car to over modes. At present shoppers would not have this choice when visiting Morrison's and Tesco Oldings Corner, a point that seems to have been overlooked by NLP when coming to their conclusions on modal shift.

### **Conclusions**

We welcome the fact that NLP agree with our conclusions that there are no sequentially preferable sites for the Tesco element of the application proposal and that it will not have a serious impact on existing large and small shops in the town centre and nearby areas.

However, as I have detailed above, we have concerns and disagree with the comments regarding the future of the Morrison's store along with comments on job creation, linked trips and car use.

In respect of Morrison's, the operators have confirmed that the store is viable and that there is no prospect of it closure in the future. In respect of the issues of job creation, linked trips and car use, it appears that NLP have not been informed or have underestimated the effect that the wider redevelopment will have on these issues, particularly the provision of the bridge, leisure centre, offices and other commercial uses.

We consider our initial findings to be robust and would invite NLP to revisit their conclusions in light of the comments made in this letter.

Yours sincerely

**ADAM GOSTLING**