

MILTON KEYNES RETAIL CAPACITY AND LEISURE STUDY

Cabinet Member: Councillor Mike Galloway (Development Control and Environment)

Report Author: Michael Moore, Senior Planning Officer, Tel: (01908) 252352

1. Purpose

- 1.1 To report to the LDF Advisory Group on the main issues raised by the public consultation held on the draft retail capacity and leisure study. To highlight any significant changes proposed by the consultants Roger Tym and Partners to their final report.

2. Background

- 2.1 Roger Tym and Partners (RTP) were commissioned by the Council to undertake this study in 2007, following a competitive bidding process. This retail and leisure study is one of a series of background documents, which are intended to form part of the evidence base and inform the content of the Council's Core Strategy and subsequent LDF documents.
- 2.2 The retail and leisure study assesses if additional retail development is required within the Borough and forecasts the amount of convenience (food) & comparison (non-food) floorspace required in the future and where it should be located consistent with Government and other relevant planning policies. The study also assesses the retail provision required to serve the proposed Strategic Development Areas (SDA's) to the South West and South East of the city.
- 2.3 At its meetings on the 16 December and reconvened meeting on the 22 December 2008, (Minute C183 refers) the Cabinet approved-
- (a) Public Consultation on the Retail and Leisure Study.
 - (b) That the report be approved as part of the Council's technical evidence base to help inform the Core Strategy and subsequent Local Development Framework documents pending public consultation.
 - (c) That the Council enter into discussions with agents/owners of major property interests in Central Milton Keynes (CMK) to establish a programme and

arrangements for the delivery of additional retail /or other floorspace on sites within Central Milton Keynes.¹

- (d) That authority be delegated to the Cabinet member with responsibility for Strategic Planning to approve any required changes to the report following consideration of public consultation responses.

3. Public Consultation Arrangements

3.1 Public consultation on the retail and leisure study took place over an eight-week period from Monday 22 December to Monday 16 February. The study was available to download through the Council's web site and was advertised as a consultation document. Hard copies of the document were available at the Council's Civic Offices, in all Borough public libraries and in Members Group Rooms. CD's of documents were circulated to individuals and those organisations who requested it. Additionally, news items publicising the consultation appeared in the Councils Weekly News and e-mails circulated by the MKCVO. A large number of organisations were contacted by letter and by e-mail including:-

- The South East England Regional Assembly, Milton Keynes and South Midlands Executive Team, the Homes and Communities Agency, the MK Local Strategic Partnership
- All neighbouring authorities in Beds, Bucks and Northants adjacent to Milton Keynes and the West Northants Development Corporation
- All Parish and Town Council's in the Borough.
- Invest in MK, MKELP, CMK and Town Centre Partnerships, Bletchley Development Board, MKCVO and business groups such as the Federation of Small Businesses, Chambers of Trade etc.
- Planning Consultancies and agents acting for companies in Milton Keynes

3.2 To publicise the consultation officers made presentations about the study to number of groups including the CMK Development Sub-Group, the Joint Economic Delivery Team (JEDT) and the Newport Pagnell Business Association.

4. Public Consultation Responses

4.1 Individuals and bodies who responded to the consultation on the draft retail and leisure study are listed in Annex A, in all around 18 sets of comments were received. Details of the responses received are set out in Annex B. The majority of responses to the consultation came from consultancies/agencies acting for major commercial interests including the owners of Midsummer Place, the Shopping Centre and the MK Theatre District. There were also a number of responses from Parish and Town Council's.

¹ Development in CMK is being taken forward as part of City Core Vision and MKP on behalf of the Council have organised a roundtable discussion with key stakeholders in the City Core.

- 4.2 Responses were received from the promoters of Salden Chase in the proposed SW SDA located in Aylesbury Vale District and Oakgrove, which is the subject of a current planning application.
- 4.3 There were a number of representations expressing concern about the health of a number of established district and town centres in the Borough including Wolverton, Newport Pagnell and in particularly Bletchley. A number of suggestions were made to improve the health of these centres. In the case of Bletchley although it was acknowledged that strategies existed to regenerate the town centre, concern was expressed at the slow progress in implementing those interventions. The West Northamptonshire Joint Planning Unit made representations about the expansion of CMK and its impact on the redevelopment of Northampton town centre.
- 4.4 Following the consultation, a number of proposals came “out of the woodwork”. These included Jones Lang LaSalle on behalf of the owners of Milton Keynes Theatre District, who want to promote additional cinema provision in CMK. Additionally, Barton Willmore on behalf of CBRE Investors propose the provision of a major supermarket or superstore with smaller unit shops in Stony Stratford at Cofferridge Close. Officers will follow up these representations.
- 4.5 There were strong representations from Woburn Sands Town Council to any proposed downgrading of Woburn Sands from a town centre to a local /village centre in the retail hierarchy.

5. Main Issues and proposed Changes to the Report

- 5.1 RTP have been asked to update and revise their report to reflect the following
- a) The housing numbers in the final version of the South East Plan.
 - b) Any changes to population and spending forecasts including [Internet/ Special Forms of Trading (SFT)] since the draft report was produced including an indication of how sensitive floorspace projections are to increases in SFT spending.
 - c) The benefits of leisure development to the City and any new information on leisure facility deficiencies in Milton Keynes.
 - d) Any changes to the list of retail and leisure operator’s seeking representation within Milton Keynes.
 - e) Any typo’s, questions raised on the methodology, factual points raised by the consultation and any other significant changes since the report was prepared such as the current consultation on PPS4 which will replace the current Government guidance note PPS6 on retailing and town centre and reference to the city core vision.

5.2 Among the main issues raised by the consultation was the realism of forecasts, which predate the downturn in the economy. The consultants have produced revised figures on the amount of floorspace needed in future. These provisional figures appear below in bold in table 1, underneath the previous floorspace figures in italics.

Table 1: Gross Floorspace requirement under Strategy 1 (Sq m gross)

	2008-2016	2016-2021	2021-2026
Comparison Goods			
CMK	<i>47,100</i>	<i>59,000</i>	<i>72,200</i>
Revised Figure	19,900	51,300	45,900
Other town centres	<i>8,300</i>	<i>10,500</i>	<i>12,700</i>
Revised Figure	3,500	9,000	8,100
Convenience Goods			
Western Expansion Area	<i>3,500</i>		
Revised Figure	3,500		
Eastern Expansion Area	<i>0</i>	<i>3,500</i>	
Revised Figure		3,500	
SW SDA	<i>0</i>		<i>3,500</i>
Revised Figure			3,500
SE SDA			<i>3,500</i>
Revised Figure			3,500
Other town centres	<i>600-4,100</i>	<i>4,800</i>	<i>2000</i>
Revised Figure	-2,100 to 1,300	4,800	2,600

NB. Please note all revised figures are provisional.

The implications of these changes to retail capacity are;-

- A significant decrease in the level of comparison goods retail floorspace required in the near-term (i.e. 2008-16), to around 20,000 sq.m from 47,100 sq.m gross. This reflects the contraction of expenditure on spending on comparison goods forecast in recent expenditure projections which can be expected to continue for the foreseeable future, before experiencing a

'bounce-back' effect in the period 2016-21; at this interval period the floorspace requirement has shown comparatively little decrease from that previously forecast;

- The need for new food stores to serve Milton Keynes' expansion areas remains, and RTP do not intend to make any change to their recommended strategy in this respect. However, the effect of the forecast contraction in convenience expenditure growth is that there will be a reduced amount of residual expenditure available to support other convenience applications, which may come forward, particularly in the period to 2016.

5.3 A number of representations have criticised the size of the food store proposed in the WEA and the SW SDA at 3,500 sq metres (gross) alleging that this is too small and should be bigger. The consultant has confirmed this size of store is needed to serve the proposed housing around it without damaging or undermining the vitality and viability of existing centres.

6. Conclusions

6.1 Members are asked to note that Councillor Galloway as the member with responsibility for Strategic Planning will be approving any changes to the report.

NB: Tamsin Cottle of Roger Tym and Partners who prepared the report will be at the meeting to answer member's questions.

WHO RESPONDED ON THE DRAFT RETAIL CAPACITY AND LEISURE STUDY CONSULTATION?

Regional Organisations

- 1) South East Regional Assembly

Local Authority

- 2) West Northamptonshire Joint Planning Unit

Parish /Town Council

- 3) Stony Stratford Town Council
- 4) Wavendon Parish Council
- 5) Woburn Sands Town Council
- 6) Bletchley and Fenny Stratford Town Council

Consultancies/ Property Companies

- 7) Barton Willmore on behalf of CBRE Investors
- 8) Drivers Jonas on behalf of Legal and General Assurance Society Limited (Owners of Midsummer Place)
- 9) G L Hearn on behalf of Gallagher Estates (Western Expansion Area)
- 10) Jones Lang LaSalle on behalf of RREEF UK Retail Property Fund. (Owners of Milton Keynes Theatre District.)
- 11) King Sturge 13.2.2009 on behalf of a consortium for Salden Chase in SW SDA
- 12) Savills on behalf of Crest Nicholson (promoters of Oakgrove)
- 13) Turleys Associates on behalf of the joint owners of the shopping centre/ the centre: mk
- 14) Turleys Associates on behalf of Sainsbury's Supermarkets Limited

Other

- 15) Mr Allan Nall on behalf of Bletchley and Fenny Stratford, Stony Stratford and Wolverton Business Associations
- 16) T Keller on behalf of Bletchley and Fenny Stratford Business Association
- 17) Cllr Mike Galloway
- 18) Mr D Munday on behalf of Newport Pagnell Business Association

ANNEX B: COMMENTS OF RESPONDENTS ON DRAFT RETAIL AND LEISURE STUDY.

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
1) South East Regional Assembly	Support the recommendations set out within the conclusions of the report.	1) Noted	1) None
2) West Northamptonshire Joint Planning Unit (on behalf of the West Northamptonshire Joint Strategic Planning Committee).	<p>1) Impact of CMK on Northampton Town Centre: Acknowledge CMK is a regional shopping centre whose popularity has increased in recent years. However, consider CMK is adversely affecting Northampton town centre and increases in floorspace in CMK could potentially undermine investment in Northampton.</p> <p>2) Do not support the case for rolling forward existing shares of retail expenditure assumed within the retail & leisure study.</p> <p>3) Question the realism of predicted levels of spend, particularly in short term.</p>	<p>1& 2) Northampton is similar to Milton Keynes and both are major growth areas within the Milton Keynes and South Midlands sub-region. Floorspace to be provided within CMK is needed to meet the city's growth and will not be completed for some years. The current recession provides relevant Northampton agencies with an opportunity to plan for the redevelopment of Northampton town centre. Arguably, this is a more positive way to proceed than to ask Milton Keynes to delay the development of CMK.</p> <p>3) Consultants have re-examined their forecasts.</p>	<p>1&2) None</p> <p>3) Revised forecasts to appear in final document.</p>

<p>2) West Northamptonshire Joint Planning Unit (on behalf of the West Northamptonshire Joint Strategic Planning Committee).</p>	<p>4) Question the cap on special forms of trading (SFT) like the Internet, catalogue etc assumed in study (14.4% after 2016).</p> <p>5) Consider that the impact of Internet could be much greater (20% by 2016) which would reduce the need for new floorspace.</p>	<p>4) RTP are using published sources on percentage of expenditure spent using SFT/Internet on comparison goods to give some indication of the amount of spending in this area.</p> <p>5) Future monitoring should pick up this trend, which may provide scope to reallocate land no longer needed for retail purposes to other uses.</p>	<p>4&5) Ask RTP to check if forecasts for spending on SFT have changed since draft report produced and provide an indication within the report of how sensitive floorspace projections are to increases in SFT spending.</p>
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>3) Driver Jonas on behalf of their client Legal and General Assurance Society Limited (Owners of the Midsummer Place Shopping Centre)</p>	<p>1) Question the realism given current market conditions of the amount of new comparison retail floorspace projected in the study, particularly in the period up to 2016. Notes projections are sensitive to changes to retail expenditure. Suggest MKC adopt a more cautious approach to the amount of floorspace required.</p> <p>2) Supports preferred spatial strategy (strategy 1) with new comparison floorspace focused in or closely related to CMK and the Primary Shopping Area (PSA).</p>	<p>1) Noted consultants have re-examined their forecasts.</p> <p>2) Support for strategy 1 noted.</p>	<p>1) Revised forecasts to appear in final document..</p> <p>2) No further action needed</p>

<p>3) Driver Jonas on behalf of their client Legal and General Assurance Society Limited (Owners of the Midsummer Place Shopping Centre)</p>	<p>3) Support town centre boundaries remaining unchanged.</p> <p>4) Want controls over type of retail floorspace developed in Strategic Development Areas (SDAs) so that these centres cater for local needs and do not result in the creation of high levels of comparison floorspace , which could damage other town centres</p> <p>5) Bulky goods floorspace should be considered on a case by case basis. Want controls over type of retail floorspace developed in retail parks so that they do not negatively impact on town centres.</p> <p>6) Drivers Jonas would welcome a meeting with Planning Officers to discuss future retail provision.</p>	<p>3) Support noted</p> <p>4) The Council shares Drivers Jonas general concerns. Within the SDA's new retail, floorspace is being provided to cater for the essential needs generated by the SDA's themselves, overprovision of floorspace could undermine the vitality and viability of existing centres. As the SDA's are not located exclusively within Milton Keynes, the Council will work with relevant agencies on relevant development frameworks and make representations on planning applications if necessary.</p> <p>5) Planning applications considered on a case-by-case basis. MKC has imposed restrictions on development in retail warehouse parks.</p> <p>6) Noted.</p>	<p>3) No further action needed</p> <p>4) Matter to be kept under review.</p> <p>5) Matter to be kept under review.</p> <p>6) Officers to arrange meeting.</p>
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>4) Jones Lang LaSalle on behalf of RREEF UK Retail Property Fund. (Owners of Milton Keynes Theatre District.)</p>	<ol style="list-style-type: none"> 1) Want greater emphasis on the benefits of leisure provision both to the city and in particular, within the Theatre District. 2) Consider the report's analysis of leisure provision is vague. 3) Study focuses to much on quantitative indicator's (such as per capita leisure spending) rather than qualitative factors ,which underpin the need for leisure space e.g. a deficiency in existing provision, an improvement of consumer choice, better efficiency and encouraging competition and innovation 4) Report has omitted comment on operator demand. 	<p>1-3) Agreed report could emphasize more the benefits of leisure development to the City. Check with RTP if information available to revise report to address these concerns.</p> <p>4) Report has tried to identify retail and leisure operators seeking representation within the city utilising published sources but it is acknowledged that this can never be comprehensive and is a snapshot at a particular period.</p>	<p>1-3) RTP to revise report to reflect benefits of leisure development to the City and if new information available of deficiencies in leisure provision.</p> <p>4) Check with RTP if list of operator's seeking representation within Milton Keynes has changed since draft report produced.</p>

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>4) Jones Lang LaSalle on behalf of RREEF UK Retail Property Fund. (Owners of Milton Keynes Theatre District.)</p>	<p>5) Argues cinema provision in MK is deficient although cinema provision in MK in terms of screens per 100,000 population is higher than in UK. More provision is needed within CMK.</p> <p>6) Need for & the qualitative factors behind future cinema provision are not addressed adequately in the report.</p> <p>7) Comments that hotel provision not examined in study. Hotels would complement retail and leisure and be supported by the development of a wider leisure offer.</p> <p>8) The study identifies a requirement for a casino/bingo offer, the provision of hotel development would strengthen the attraction for leisure operators to co-locate and operate in MK.</p>	<p>5) Noted</p> <p>6) Draft report focuses on quantitative factors reflecting brief for this study. RTP to investigate if any new information available on qualitative factors see reply to 1-3 above.</p> <p>7) Retail and Leisure study does not address hotel provision within MK since that would duplicate a separate hotel study led by Invest in Milton Keynes.</p> <p>8) MK Council is currently reconsidering application for a hotel and casino by Xscape in CMK.</p>	<p>5) Bring to the attention of those progressing City Core Vision, Jones LaSalle's clients proposal for additional cinema provision in CMK. Refer to Milton Keynes in title of Table 5.11</p> <p>6) See reply to 1-3 above.</p> <p>7) No further action needed</p> <p>8) No further action needed.</p>

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>5) Barton Willmore on behalf of CBRE Investors</p>	<ol style="list-style-type: none"> 1. Refers to Stony Stratford only containing a small Budgens supermarket at Coffridge Close and the Tesco store at Wolverton dominating convenience goods retailing in Zone 7 and surrounding zones. 2. Propose provision of a major supermarket or superstore with smaller unit shops in Stony Stratford at Coffridge Close to claw back some convenience expenditure going to Wolverton. 3. Support increases in and extensions to existing facilities appropriate to the centre it is located in. 4. Support concentrating development in CMK but do not want this to be at expense of smaller centres. 5. Want to be added to Council's mailing list. 	<p>1&2) Noted</p> <p>3) Noted</p> <p>4) Support noted. PPS6 and retail study do not prevent development within smaller centres, consistent with their position in retail hierarchy.</p> <p>5) Noted</p>	<p>1&2) Arrange meeting with consultants to discuss proposed development in Stony Stratford.</p> <p>3) No further action needed.</p> <p>4) No further action needed.</p> <p>5) Add consultants details to Core Strategy database.</p>

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>6) GL Hearn on behalf of Gallagher Estates.</p> <p>Gallagher Estates have a significant interest in the Western Expansion Area (WEA).</p>	<ol style="list-style-type: none"> 1. Highlight some formatting and drafting errors including different turnover figures appearing in spreadsheet appendices and those quoted in main report text. 2. Questions methodology of study e.g. population forecasts for WEA. Refer to Volume 2 of study not being available and want assessment of retail capacity to use latest South East Plan housing figures. 3. Study identifies that provision of a 3500 sq m (gross) food store required in WEA by 2016 but GL Hearn question how figure arrived at. 4. Store should be bigger than 3500 sq metres to allow for some comparison goods floorspace and in store provision. Seek a food store of 7000 sq m gross or 5500 sq m (net) 	<p>1) Agreed</p> <p>2) Methodology set out on page 92 para 5.4, study utilises population data for MK provided by MK Observatory and Map Info data. Final housing numbers for MK appeared in SE Plan appeared on 6th May. Volume 2 of study is available.</p> <p>3) Figure reflects size of store RTP estimate will be needed to serve proposed housing development in WEA.</p> <p>4) See answer to 3 above there is no justification in the retail study for a store of this size.</p>	<p>1) Consultant to correct figures and ensure they are consistent.</p> <p>2) Study being revised to reflect latest SE Plan housing numbers. RTP to clarify and make clear what population data has been used, its source and changes made since draft study produced.</p> <p>3) Check if further clarification needed.</p> <p>4) Check if further clarification needed. Study should highlight the implications and consequences if the food store is significantly bigger than proposed.</p>

<p>6) GL Hearn on behalf of Gallagher Estates</p>	<p>5. Shopping patterns in zone 6 are likely to change with provision of food store in WEA however this scenario has not been modelled.</p> <p>6. Argue WEA food store not regarded as a commitment unlike centre: Mk.</p> <p>7. Study should reflect expenditure inflows to main food stores around the city including areas to the west of WEA.</p> <p>8. Ask RTP to review their report in the light of these considerations</p>	<p>5) This study is seeking to identify what retail provision is needed to serve future development in the WEA. Any changes to shopping patterns resulting from a new food store in the WEA will feature in subsequent retail studies.</p> <p>6) The WEA already has outline planning permission for development including a food store (a fact acknowledged in the agents submission.) The retail study regards it as a commitment. The comparison with the centre:mk is misleading since outline planning permission for the centre:mk extension has lapsed.</p> <p>7) See answer to 3 above. The primary purpose of the new food store in the WEA is to serve the shopping needs generated by the population in the WEA.</p> <p>8) Noted</p>	<p>5) No change needed.</p> <p>6) No change needed.</p> <p>7) Check if further clarification needed.</p> <p>8) No change needed</p>
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>7) King Sturge on behalf of consortium developing the SW Strategic Development Area (letter of 13th Feb)</p>	<p>1. “Over, all we agree to the methodology and the approach that [the] review has taken and in this respect we generally support its recommendations. However, in terms of the size of the supermarket, and the centre as a whole further considerations should be given to qualitative issues ,and in particular the need to effectively compete with the large –footprint out-of-centre superstores such as the Tesco Extra and the Asda Wal-mart super centre at Bleitchley.”</p> <p>2. Object to proposed 3500 sq m food store identified in study at Salden Chase. Argue store is too small, will serve top up trade and not meet day to day needs and prevent residents travelling to other larger stores.</p>	<p>1-3) Figure reflects size of store RTP estimate will be needed to serve proposed housing development in Salden Chase, which is the responsibility of Aylesbury Vale District Council.</p>	<p>1-3) Check if further clarification needed.</p> <p>Study should highlight implications and consequences for Milton Keynes and Bleitchley if the food store in SWSDA is significantly bigger than study proposes.</p>

<p>7) King Sturge on behalf of consortium developing the SW Strategic Development Area</p>	<p>3. Propose a 5000 sq metre store plus two local centres (providing approximately 10 shops in each centre) at Salden Chase.</p> <p>4. Retail study should make it clear that other proposals not fitting with the retail strategy should be resisted as they would prejudice the provision of the planned retail facilities.</p>	<p>4) Point covered in requirements of national and regional policy. Could point be made more explicitly?</p>	<p>4) Check with RTP</p>
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
8) Councillor Mike Galloway	<p>1. Refers to some discrepancies between contents identified in para 1.9 of the main report and contents lists page. Para 1.1 identifies brief is in appendix 1 but it is not.</p> <p>2. Zones: Zones used in study are the same used in previous studies. Do not appear to follow natural or administrative boundaries</p> <p>3. Insufficient account has been taken of current and permitted growth at Wolverton, Stantonbury Park farm and NEA (Rocla Pipes)</p> <p>4. Household survey; Insufficient sample size to reflect consumer behaviour and make assumptions about shopping behaviour</p>	<p>1) Agree</p> <p>2) More zones used in this study than in previous CBRE study in 2003 to give a finer grain of analysis. Seven zones used for City. Zones used defined by postcodes do not necessarily follow administrative boundaries.</p> <p>3) Data on housing and population numbers supplied by MK Observatory.</p> <p>4) Telephone survey of over 2500 households undertaken by NEMS Market Research in 2008. Number of interviews in each zone weighted to size of population base hence more interviews in densely populated urban areas than thinly populated rural ones. Statistical reliability of survey sample in page v of NEMS report. Confidence level used is 95% so that in 19 out of 20 instances the actual population behaviour will be within the confidence interval range.</p>	<p>1) Consultant to correct minor typo's and ensure figures are consistent.</p> <p>2) No change needed.</p> <p>3) Check most recent housing and population data used.</p> <p>4) No change needed.</p>

<p>8) Councillor Mike Galloway</p>	<p>5. PPS6: Insufficient is being done or proposed within report to deal with :-</p> <ul style="list-style-type: none"> -The Council promoting town centre management and creating town centre partnerships -Adopting a positive and proactive approach to planning in Town centres. -Collecting data and monitoring the health of town centres <p>6. More use should of being made of GOAD reports for each town centre and the Council should of asked GOAD to produce special reports for locations such as Wolverton or added it to their coverage.</p> <p>7. Little evidence of on-foot surveys and photographic evidence in report.</p> <p>8. Clarify if Fenny Stratford in Bletchley as mentioned in para 3.5.</p> <p>9. Refers to para 3.66 on health of Bletchley town centre</p>	<p>5) The retail report identifies the measures identified in PPS6 that local planning authorities should implement to achieve the Government's objectives for town centre. However, it is for the Council to decide its priorities and how these should be resourced. Chapter 3 of the report has done a health check of centres in Milton Keynes analysing their vitality and viability of centres using published sources such as GOAD where available and on foot-surveys.</p> <p>6) Experian do not produce GOAD survey data for Wolverton town centre and budget did not allow for GOAD survey to be undertaken so consultants have attempted to break down types of uses in centre.</p> <p>7) Where foot surveys undertaken is mentioned throughout the report. RTP could be asked to put some photos in document to illustrate points.</p> <p>8-9 and 13,15- 16 Ask RTP to clarify</p>	<p>5) Member may wish to consider the wider issue of how to promote town centre regeneration.</p> <p>6) No change needed.</p> <p>7) Ask RTP to consider putting some photo's into report.</p> <p>Points 8-9 and 13,15- 16. Ask RTP to clarify these points.</p>
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<p>8) Councillor Mike Galloway</p>	<p>could other data sources other than MHE be used.</p> <p>10. No reference to Wolverton Regeneration Strategy & Wolverton West End Development framework in para 1.5.</p> <p>11. Para 3.3 refers to competing centres to MK being Northampton, Bedford and Luton. Asserts CMK's status as a sub-regional centre means it competes with centres within a larger drive time.</p> <p>12. Para 3.17 Size of new Sainsbury's is not mentioned.</p> <p>13. Para 3.14 refers to absence of furniture ,textiles etc in CMK being explained by limited provision of retail warehousing in CMK.</p> <p>14. Confusion about what is meant by CMK?</p>	<p>10) Could be mentioned.</p> <p>11 &17 These centres are the main centres neighbouring MK and some of them are sub-regional centres. It is suggested they be retained, as they are useful comparators to MK.</p> <p>12) Size already identified in figure 4.6</p> <p>13) Covered above</p> <p>14) Definition of CMK needs to distinguish between the CMK primary shopping area where new large-scale retail development encouraged and wider CMK including Campbell Park where retail development more limited. Area between west coast railway line , Grand Union canal and H5 and H6.</p>	<p>10) Mention Wolverton Regeneration Strategy & Wolverton West End Development Framework in para 1.5.</p> <p>11 &17) Suggest comparison of MK to Northampton, Bedford and Luton be retained.</p> <p>12) No change needed.</p> <p>14) Define CMK more carefully in report.</p>
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
8) Councillor Mike Galloway	<p>COMMENTS</p> <p>15. Too much reliance on published sources.</p> <p>16. Para 3.43 What is the evidence behind the statements made.</p> <p>17. Para 3.47 Critical of comparison made between CMK and traditional town centres like Northampton and Bedford a different analysis should be undertaken.</p> <p>18. Para 3.46 Why is the Food Centre vacancy rate so high?</p> <p>19. CMK Pedestrian Flows: when were the visits made to various centres? Were visits undertaken when open air market open?</p> <p>20. Road & Pedestrian Layout: Unhappy with some of the comments made in para 3.62.</p> <p>21. Comments on Bletchley and Wolverton town centre.</p>	<p>15) Using published sources is often more cost effective and often the only source of data available.</p> <p>16& 17 covered earlier</p> <p>18) Explanations likely to include lack of passing trade and anchor store with Sainsbury's relocating and poor connections to the centre: mk.</p> <p>19) Ask if RTP can clarify</p> <p>20-21) Check with RTP if anything to add/change.</p>	<p>18) No change needed.</p> <p>19-21) Clarify with RTP if anything to add/change.</p>

NAME OF RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
9) Woburn Sands Town Council	1) Strongly object to the consultant's proposal to downgrade Woburn Sands from the status of town centre in the retail hierarchy to the local/village centre tier.	1) Woburn Sands is one of the historic market towns in the Borough comparable with other market towns with a wider range of facilities than many local /village centres. Given the fact that the retail hierarchy for Milton Keynes was only finalised in the Local Plan in 2005. Ask RTP to reconsider this proposal.	1) Ask RTP to reconsider this proposal.
10) Stony Stratford Town Council	1) Thank the Council for the opportunity to comment. 2) Noted that the report reveals Stony Stratford is providing a good range of retail outfits and therefore due care should be taken to ensure that any developments on the Western flank should not prejudice their viability.	1) Noted 2) Noted	1-2) No need to change report

NAME OF RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
11) Wavendon Parish Council	<p>Comments that the research seems comprehensive, but seems to suggest Strategy 1 will best satisfy the identified retail and commercial leisure needs.</p> <p>1) Concerns over the use of Strategy 1</p> <ul style="list-style-type: none"> - Strategy 1 involves meeting most of the comparison retail and commercial needs in CMK. A centre, which is already well served for retail and commercial leisure. - Strategy 1 involves only allowing for locally derived comparison retail and commercial leisure needs in smaller town centres, while limiting the amount of significant out-of-centre development. However smaller town centres (especially Bletchley) are already acknowledged to require development. - No objection to aligning convenience floor space with areas of high population growth, with a residual to support smaller incremental 	<p>1) National and regional policy is to encourage development within centres rather than outside them.</p> <p>The bulk of new comparison retail floorspace provision will be in CMK, which has the capacity to accommodate it, fitting its status as a regional shopping centre.</p> <p>However, this does not rule out development within existing town centres. Development within the primary shopping areas of town centres does not need to show a need for it and complies with the sequential test.</p>	<p>1) Need to clarify that development in CMK does not rule out development in smaller centres.</p>

<p>11) Wavendon Parish Council</p>	<p>increases and extensions to existing facilities.</p> <p>2) Concerned that overall the Strategy takes no account of the effects that increasing centralisation of retail and commercial leisure facilities will have on the need to travel and the impact on the problematic issues of access and parking in CMK.</p>	<p>2) Assumptions about the growth of CMK are already considered in transport arrangements for CMK including parking and access. The further growth of CMK will generate more demand for travel and creates more scope and opportunities for trips by alternatives to the car.</p>	
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>12) Bletchley and Fenny Stratford Town Council</p>	<p>1) The report states there is no convenience store in Fenny Stratford; this is incorrect as there is a Londis in Victoria Road.</p> <p>2) Not enough attention is paid to Queensway as a shopping area, especially given that it is the 2nd retail centre in Milton Keynes.</p> <p>3) There is no clear strategy or vision for Central Bletchley or Queensway.</p> <p>4) The report gives the perception that Bletchley is a good retail centre and does not need any further investment or development, this is not correct.</p> <p>5) Including the retail parks in the figures for Central Bletchley, skew the figures for Queensway.</p> <p>6) It was felt that there was little substance in the report.</p>	<p>1) Noted</p> <p>2 & 3) Queensway is covered in the retail and leisure report. The retail and leisure study does not deal with detailed strategies for Bletchley since a Central Bletchley Regeneration framework already exists for Bletchley and was adopted as SPG in 2004</p> <p>4) Para 3.79 of the retail and leisure study clearly states that "current vacancy level [in Bletchley] gives some cause for concern." Some 14% of shop units were vacant in Bletchley town centre in January 2008 before the onset of the recession.</p> <p>5) Noted, the figures referred to in 4 above refer to the town centre.</p> <p>6) Noted</p>	<p>1) RTP to amend report</p> <p>2-4) The comments from the Town Council and also from the Bletchley and Fenny Stratford Business Association later highlights the issue of what measures should be taken to regenerate Bletchley and progress on implementing measures in the Bletchley Regeneration Framework.</p>

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>13) Newport Pagnell Business Association</p>	<p>Comments that</p> <ul style="list-style-type: none"> a) Retail business in the market towns in and around Milton Keynes have suffered from the major investment into CMK and other centres. b) Notes the dependency of Market Towns on service retail. c) Market Towns need encouragement and support to maintain their viability in the future. <p>Suggests several ways in which this could be done:</p> <ul style="list-style-type: none"> - Make changes to the details of the way that planning permission is given. - To apply restrictions on the A1 licence to help maintain the service element in smaller units and therefore be more suitable for the Market Towns. <p>Suggests main objective is to ensure Market Towns do not suffer from major intrusion from big stores.</p>	<p>Newport Pagnell was the subject of a major town centre improvement scheme. More recently the town is benefiting from the SEEDA small rural towns programme with support from officers across MKC. Malcolm Godwin (County Coordinator for Market Towns) is an active member of the Newport Pagnell Partnership.</p> <p>There are limits to what the Council can do through development control policies. All the High Street between 17 and 77 and 22 and 88 inclusive are already subject to restrictions restricting the loss of A1 retail units.</p> <p>Noted, All planning applications for retail development are considered against relevant national and local planning policies and assessed to see if they cause harm to the vitality and viability of other centres.</p>	<p>The comments from the Business Association highlight the issue of what can be done to improve the health and vitality of market towns.</p>

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>13) Newport Pagnell Business Association</p>	<p>2) Car Parking: States that the provision for car parking is particularly important for retail services business.</p> <p>3) Town Centre Designation: Objects to the area from Market Hill to The Fire Station being taken out of the 'Town Centre' designation because:</p> <ul style="list-style-type: none"> - This is the last sector of the town that could be used for expansion of town centre activities, especially considering a significant part has already been lost for housing. - Fears that removing the designation will make it difficult to increase the number of business and retail shops in the area should a huge growth in housing in the area require it. - There is a large area of the police station that is underused and could provide for additional business, retail and parking provision to sustain the town's future 	<p>2) Noted</p> <p>3) RTP suggest removing the "town centre mixed use notation" for the area from the health centre along the High Street and Station Road to include land at Marsh End Road.</p> <p>This is not an issue for the Core Strategy but one to be considered later for subsequent LDF documents.</p>	<p>3) Changes to town centre boundaries to be considered in subsequent LDF documents</p>

<p>13) Newport Pagnell Business Association</p>	<p>viability. It is essential to mark this area as the last lungs of the town's opportunity to grow into the future. Therefore, planning permission should never be given for building of more town centre housing on this site.</p>		
<p>RESPONDENT</p> <p>14) T Keller on behalf of the Bletchley and Fenny Stratford Business Association</p>	<p>COMMENTS</p> <p>1) Draws attention to the Central Bletchley Regeneration Strategy and the planning interventions it recommends.</p> <p>Believes that if the recommendations were to be given the priority they deserve they would have a significant effect upon Bletchley.</p> <p>Appreciates that some of these recommendations cannot now be implemented but would like to see continued or reinvigorated effort to fulfilling the specific aims of the Central Bletchley Regeneration Strategy, and believe that they should be embodied in any policy adopted in terms of retail and leisure for Bletchley.</p> <p>2) Refers to Mr Allan Nall's regarding Fenny Stratford, which has been neglected in terms of retail strategy.</p>	<p>MKC RESPONSE</p> <p>The retail & leisure study highlighted the large number of vacant premises in Bletchley, before the onset of the current economic downturn.</p> <p>Representations highlight the need to implement and delivery the interventions proposed in the Central Bletchley Regeneration Strategy (if still considered appropriate).</p> <p>Some discussions on options in Bletchley have take place at member level including the possible appointment of a town centre manager utilising funds from S106 contributions</p>	<p>ACTION POINTS</p> <p>The comments from the Business Association highlight the issue of what can be done to improve the health and vitality of market towns.</p>

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>15) Allan Nall on behalf of the Business Associations of Bletchley and Fenny Stratford</p>	<p>Notes that traditional town centres contribute in a unique way to the retail offer in Milton Keynes, where there role is essentially one where personal service contributes to the retail experience (retail service).</p> <p>Comments that recent surveys in Newport Pagnell and Stony Stratford have established that around 50% of the shops are retail comparison shops, which also offer a service (e.g. Pharmacy).</p> <p>Notes that this has come about because of the inability of traditional towns to compete with the rise of internet and superstore shopping.</p> <p>1) Main Problem:</p> <p>The Milton Keynes Retail Capacity does not address the long-term demise of retail shopping in traditional towns in Milton Keynes.</p> <p>Comments that the strategy assumes that the retail capacity in traditional towns needs to remain at the same level or grow to a higher level to continue to be viable; however, it</p>	<p>The decline of the town centre has been occurring for a number of years and predates the retail capacity study. Various Governments have introduced policies designed to resist out-of-town retailing and promote development within town centres.</p> <p>Encouraging development in town centres often, means a more</p>	

<p>15) Allan Nall on behalf of the Business Associations of Bletchley and Fenny Stratford</p>	<p>does not put forward a strategy of how this can be achieved.</p> <p>Suggests recognising the unique role of retail service in traditional towns and introducing policies to prevent superstores from introducing retail service and therefore protecting this niche for traditional towns is the answer to ensuring retail capacity remains at a viable and vital level in traditional towns.</p> <p>2) Suggests the role of the Council's retail strategy is to avoid future development control mistakes, by not allowing the development of superstores with too many retail services close to traditional towns.</p> <p>3) Bletchley:</p> <p>Notes that the Survey of Bletchley was pretty accurate.</p> <p>4) Fenny Stratford:</p> <p>Agrees that Fenny Stratford would benefit form a small convenience store, but also adds it would also benefit from a financial outlet having recently lost the Post Office.</p> <p>Agrees Fenny Stratford would also benefit from environmental improvements. Suggests these</p>	<p>proactive approach needs to be adopted by the Local Planning Authority to facilitate development e.g. site assembly as land is often in multiple ownerships . It a lengthy and time consuming process.</p> <p>This strategy of encouraging development within town centres including CMK is reflected in various planning policy documents produced by the Council. The Local Plan identifies that the Council seeks to regenerate Wolverton and Bletchley Town centres. Work on an Area Action Plan for Wolverton was put aside at the Government Office's request to focus and progress the Core Strategy</p> <p>2) In assessing planning applications, MKC does consider the effect of the proposal on existing town centres.</p> <p>3-6) Check with RTP if any relevant updates since health check of centres</p>	<p>3-6) Check with RTP if any relevant updates since health check undertaken of various centres.</p>
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<p>15) Allan Nall on behalf of the Business Associations of Bletchley and Fenny Stratford</p>	<p>involve correcting several areas, which restrict retail activity including no short stay parking in Aylesbury Street and inadequate lighting in George Street and Denmark Street Car Parks.</p> <p>5) Stony Stratford</p> <p>Highlights that consultants comment on high number of charity shops in Bletchley yet have missed that Stony Stratford has a larger percentage. Presumes therefore that the same comments applied to Bletchley also apply for Stony Stratford. i.e. comparison goods offer is pitched towards the lower end of the market.</p> <p>Surprised that the number of banks and financial services in Stony Stratford is stated as less than the national average, considering it has three banks, one building society and several accountants.</p> <p>6) Wolverton:</p> <p>Concerned that the consultant missed many of the small empty units in the vicinity of Church Street and The Square in Wolverton, and that this high number of empty units will not improve with the current planning application for an enlarged store.</p>		
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<p>15) Allan Nall on behalf of the Business Associations of Bletchley and Fenny Stratford</p>	<p>Concerned by the damaging effects of the original opening of Tesco's. (i.e. closure of Budgens and the Co-op, and lack of replacement units)</p> <p>States that Wolverton's retail sector is suffering far more than the consultant has identified, and formally requests that the consultant specifically reviews Wolverton again.</p> <p>7) Suggests the Strategy should relate available parking space and retail floor area together.</p> <p>8) Comments that there is no mention in the Leisure Strategy of activities, which occur very regularly in traditional towns attracting up to 100 or so people a time, including activities such as folk clubs, dances and activities for young people.</p>	<p>7) This was outside the consultants brief for this study but parking data is available.</p> <p>8) Agreed , there is no mention of these activities, which do have a valuable role to play in promoting the vitality of centres . This was outside the consultants brief for this study.</p>	
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>16) Turley Associates on behalf of the joint owners of shopping centre/the centre:mk.</p>	<p>1) Considers that, overall the review provides a comprehensive assessment of retail patterns, potential development capacities for the city and its various centres, detailed analysis of the role and functions of the City centre and other centres and examination of the options for future growth.</p> <p>2) The Centre's Future Vision:</p> <p>Suggests that in finalising the Review it is important to recognise the Councils recently approved <i>Visions for the City Core</i>. Suggests this could be done in Section 2.</p> <p>Surprised that despite acknowledging the city centre as one of the South East's 12 "centres for significant change" the study fails to plan positively by allowing the centre to broaden its catchment or increase its share of spending within the existing catchment. Suggests that the potential for expanding the Centre's influence is both sound and in fact a prerequisite of these policy aspirations.</p>	<p>1) Support for study noted</p> <p>2) Agree; refer to work on city core vision in RTP report.</p> <p>The study acknowledges that CMK has capacity to develop further. However, the outline planning application for extension of the centre:mk has lapsed and there is no firm timetable for when the joint owner's development will be coming forward with a revised scheme.</p> <p>It is common ground the retail offer of CMK should expand as Milton Keynes grows but MKC would</p>	<p>1) No action needed.</p> <p>2) Make reference to work on city core vision in RTP report</p>

<p>16) Turley Associates on behalf of the joint owners of shopping centre/the centre:mk.</p>	<p>Suggests recognition that the Centre will require a growth in its status and hence its market share is required.</p> <p>3) Protecting Existing Retail Patterns:</p> <p>Agrees with taking into account existing developments and planned commitments in predicting future spare capacities.</p> <p>Questions the choice to increase the share of the market taken by the internet and by 'special forms of trading' before calculating what is left over for future development. This is the opposite to assumptions made for other existing centres, removes capacity from the market that could have been allocated to development in the City Centre or other centres and, prioritising and protecting the growth of internet shopping and 'special forms of trading' is not based on any national or local policy guidance which instead prioritises competition and the expansion of town centres.</p> <p>Urges the Council to review this assumption.</p>	<p>caution that CMK expansion needs to occur in a phased manner, which does not cause harm to other centres.</p> <p>3) Raise methodology question with consultants.</p>	<p>3) Ask RTP to review this point</p>
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>16) Turley Associates on behalf of the joint owners of shopping centre/the centre:mk.</p>	<p>4) Future Development within the city centre:</p> <p>Notes the conclusions relating to strategies for future development within the City Centre, in particular development between 2008 and 2016 and post 2016, dismissing alternative strategies for dissipating development around the city and the assessment of policy and retail hierarchy with regard to strategies for Central Milton Keynes.</p> <p>Endorses these conclusions and urges the council to ensure that they are given due importance in preparing policies for the emerging Core Strategy and any supplementary planning document.</p>	<p>4) Comments and support noted. As previously stated the retail and leisure study is one of a series of background documents, which are intended to form part of the evidence base and inform the content of the Council's Core Strategy and subsequent LDF documents.</p>	

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>17) Turley associates on behalf of Sainsbury's Supermarkets Limited</p>	<p>1) Convenience Retail Strategy: Notes that whilst the study provides three alternative strategies for comparison goods retail provision across the borough, only one strategy option is provided for convenience retailing.</p> <p>Notes that the strategy for future growth ignores the growth identified to the North of Milton Keynes.</p> <p>Notes that the convenience strategy does not directly promote convenience retail investment in existing centres, as existing provision is effectively self sufficient within the catchment area.</p> <p>Comments that this masks the differences in the various zones across the district and therefore the strategy doesn't balance the trading patterns across the city and borough, and being based on the assumption that all centres and stores maintain the same market share into the future, it ignores the potential that some stores and centres may be overtrading whilst others may be</p>	<p>Study considers growth for the whole of the Borough not just the north of Milton Keynes</p> <p>The retail study does refer to other documents promoting development in existing centres e.g. Local Plan and does identify capacity for convenience floorspace over the plan period.</p> <p>Retailing is very dynamic industry and if stores and centres are overtrading, the market adjusts over time. Firms move to bigger stores operators bring forward expansion plans. Ask RTP to address this criticism of their methodology</p>	<p>1) RTP to address criticism of their methodology</p>

<p>17) Turley associates on behalf of Sainsbury's Supermarkets Limited</p>	<p>fading.</p> <p>States that following this strategy would not accord with the objectives of PPS 6, which promotes investment in centres to maintain or enhance vitality and viability.</p> <p>Urges this assumption be reconsidered and a more finely grained assessment of the convenience retail environment to be undertaken.</p> <p>2) Stantonbury:</p> <p>Notes the study's conclusion that Stantonbury is a failing centre and comments on several other observations attesting the Centres poor performance.</p> <p>Promotes the potential for Stantonbury Centre.</p> <p>Comments that study zones are not finely grained enough to establish local shopping patterns. For example shopping patterns in Zone 5 (includes Stantonbury) are skewed by the inclusion of the regional centre.</p> <p>Notes 70% of Zone 5 convenience expenditure currently leaks to provision in other zones.</p>	<p>2) However, there are more zones in this study than in previous retail studies.</p>	
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RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>17) Turley associates on behalf of Sainsbury's Supermarkets Limited</p>	<p>The enhanced environmental improvements suggested in the study would not alone provide enhancements that would affect the centres trading performance.</p> <p>3) Suggests that with a supermarket anchor and a coherence of place, Stantonbury has the ingredients required of a 'district centre' as set out in PPS6 and the adopted Local Plan.</p> <p>Recommends the undertaking of a more finely grained assessment of convenience retail needs across the city, including a reconsideration of the assumptions used in respect of maintaining convenience retail market shares. This will help to locate areas under-provided for which require investment.</p> <p>Recommends that Stantonbury be designated as a 'district centre'.</p>	<p>3) Ask RTP to specifically address this "district centre" point. Study recommends no change to retail hierarchy with respect to Stantonbury.</p>	<p>3) Ask RTP to specifically address status of Stantonbury</p>

RESPONDENT	COMMENTS	MKC RESPONSE	ACTION POINTS
<p>18) Savills on behalf of Crest Nicholson (promoters of Oakgrove)</p>	<p>Representation regards the convenience goods shopping requirements in the eastern part of Milton Keynes. In relation to a current planning application for new food store shopping centre in Oakgrove.</p> <p>1) Notes that Oakgrove site lies within Zone 4. Refers to anomaly that the Eastern Expansion area and the SESDA are physically outside Zone 4, but are included in Zone 4 for the purpose of their analysis.</p> <p>2) Notes that paragraph 6.18 concludes that in addition to a food store serving the Eastern Expansion area there is scope for a further food store to accommodate growth in the SESDA in the 2021 to 2026 period.</p> <p>Notes that the study recognises the scope for a further store 'alongside' the eastern expansion area, which would serve the expansion area and Zone4.</p> <p>3) Suggests that Oakgrove could provide an appropriate location to meet the need which is forecast to</p>	<p>1) Noted</p> <p>2) This retail and leisure study is unusual in looking forward to 2026. PPS6 advises Council's to prepare forecasts for 5 years ahead or 10 years where land assembly required</p> <p>The Council would stress any floorspace figures produced by the consultant are indicative and are likely to change. Retail capacity is kept under review and assessments made of retail capacity at regular intervals.</p>	<p>NB. There is a planning application for retail development at Oakgrove currently being considered by the Council.</p> <p>The Council in its consideration of that application will address many of points raised by Savills, on behalf of their client.</p>

<p>18) Savills on behalf of Crest Nicholson (promoters of Oakgrove)</p>	<p>arise over the first part of the forecast period, as:</p> <ul style="list-style-type: none"> - It is conveniently located to serve the whole of Zone 4 and the expansion area. - The eastern expansion area included in the Local Plan is already being developed and the proposals do not include a large food store. <p>Suggests this could be the first stage of a phased approach to meeting the substantial requirement for additional convenience goods retail floorspace to serve the growing eastern residential areas, which would be followed by the development of a further store within the SESDA post 2016.</p> <p>Suggests the report should be more explicit in recognising the suitability for Oakgrove to accommodate a large food store.</p> <p>Suggests that accommodating all identified need within the expansion area alone would result in an unbalance between housing development and provision of shopping facilities.</p> <p>Notes that the proposals for a smaller</p>		
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<p>18) Savills on behalf of Crest Nicholson (promoters of Oakgrove)</p>	<p>scale centre in Oakgrove in the Local Plan and the Oakgrove SPG were formulated without the recently produced retail capacity information. Suggests therefore this data should be afforded significant weight to demonstrate that this location is appropriate for a larger scale neighbourhood centre.</p>		
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30.6.2009