

PLANNING APPLICATION REF. 18/00975/FULM

**DESCRIPTION OF DEVELOPMENT:
RETAIL DEVELOPMENT, COMPRISING FOOD AND NON-FOOD UNITS
(CLASS 1), DRIVE THROUGH UNITS (CLASS 3 AND SUI GENERIS) AND
ANCILLARY DEVELOPMENT INCLUDING ACCESS, DRAINAGE,
LANDSCAPING AND OTHER ASSOCIATED WORKS**

AT

FACTORY ELLIOT INDUSTRIAL ESTATE ARBROATH DD11 2PT

REPRESENTATIONS

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Proposed Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Maureen Beedie

Address: 8 Hercules Place Arbroath

Comment Details

Commenter Type: Community Council

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Arbroath and District Community Council held a public meeting on Tuesday 5th February, where we invited representatives from Brackenbrae Investments Limited ("the applicant") to attend and answer any questions from the public.

This was a well attended meeting and many of the public concerns were answered.

There was concern about accessibility and in particular a pedestrian crossing for the A92 to allow anyone on foot or alighting a bus easy and safe access to the retail park, this remains a concern.

There were also concerns raised about the increased volume of traffic on this stretch of the A92 and the occupancy rate of the units as this is a major gateway into Arbroath and empty units do not make a good impression on any town.

The other hot topic of debate was the effect this development may have on the town centre, which was largely alleviated by the assurances given that no retailers from the town centre were planning to relocate and that the prospective occupants of the new retail park were all businesses that did not have a presence in the town at this time. However, it was suggested that any negative impact on the town centre could be addressed by installation of information boards, advertisement boards (possibly digital ?) or some other form of encouragement for visitors to the retail park to explore Arbroath further, such as it's history, retail, eateries, entertainment etc.

The overall feeling appears to be positive, but with the above concerns.

Maureen Beedie ,

Planning contact, Arbroath and District Community Council.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs lesley murphy

Address: 11 mericmuir place dundee

Comment Details

Commenter Type: Miscellaneous

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Fantastic news!! about time. prime location. we own a holiday home in the town and feel this would benefit holidays makers, residents and provide much needed employment in the town!!! fingers crossed this goes ahead.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Sean Cochrane

Address: 1 hospitalfield place Dundee

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Bring it on. This is exactly what this town needs. A fresh burst creating more jobs and more visitors. I hope this goes ahead.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Jack Knight

Address: 36 Millfield Place Arbroath

Comment Details

Commenter Type: Miscellaneous

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I think this is a great opportunity for Arbroath and will provide the town with much needed shops and services. As a local resident the types of stores proposed would mean that I no longer have to travel to Dundee for more speciality shopping.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Carolyn MacPherson

Address: 9 Elliot Place Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Any initiative that brings much needed jobs to the area has to be welcome. Objections from competitors should be discounted. Everyone will get a fair share and more selection will be available to townspeople and visitors alike. The town centre died years ago and none of the intended occupants for this new development are likely to try and start up in the town due to lack of appropriate buildings.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Ivor McDougall

Address: 14 Leach Close Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I think it will be good for all who live at this end of town asda pets at home B & Q mcdonalds and KFC are always busy so it will give more choice plus all the jobs it will bring

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Case Officer: Ruari Kelly

Customer Details

Name: Mr David Lowe

Address: Gamekeepers Cottage Carmyllie Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This type of investment with the opportunity of jobs is essential to Arbroath

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Case Officer: Ruari Kelly

Customer Details

Name: Mr George Cant

Address: Rosemount 4 Camus Place Monikie

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I think this is a fantastic opportunity for my home town of Arbroath.

There has not been industrial companies locating in the town for years, so to be giving families the opportunity of much-needed retail jobs to be brought to the town should be highly commended.

I fully support this action.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Debbie Cant

Address: Rosemount 4 Camus Place Minikie

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Fantastic opportunity for Arbroath to bring in much needed retail jobs.

I fully support this application and wish it every success

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Reg Brown

Address: 3 Hillside Road Dundee

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Suzanne Stark

Address: 12 ferry Road Monifieth Dundee

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Think this is a wonderful addition to Arbroath & the surrounding area & the boost of economy would increase & the people visiting the town, increase employment and give more retail options to angus residents.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr James Roy

Address: 62 Hill Street Monifieth Dundee

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Combined with retail centre on the adjacent site this development would rival the large retail park at the West End of the Kingsway in Dundee. Travelling from Monifieth it is much more convenient to go to Arbroath than there. We can then use the various restaurants around the harbour if we decide to eat.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr John Stirling

Address: Arbikie Farm Inverkeilor Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: We live in a time of great change and uncertainty. We have a person that has supported Angus and Arbroath in particular throughout her working life, investing huge amounts and creating numerous jobs and opportunities. Here we have a project that will benefit Angus and Arbroath in particularity hugely in terms of jobs and support of local businesses. I can't think there is even a debate or question about this project

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Joseph Mitchell

Address: Hillside Road Forfar

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I wish register my support of this application.

I appreciate that some local town centre traders may fear that this application will impact negatively on their businesses and there is no doubt that town centres across the UK are facing serious challenges as shopper's habits and preferences change. I feel however that as a result of these changing habits many shoppers have already moved away from traditional High Street shops for the convenience of on line retailers and out of town retail parks. Arbroath is no different to the rest of the UK and a high percentage of its residents will continue to go to the out of town retail parks regardless of whether this application is refused or not. Refusing this application will not drive these people who already use out of town retail parks back to the High Street.

Approving this application however will mean that the shoppers, who have already deserted the High Street, will be able shop in Arbroath without the need to go further afield. It would therefore improve what Arbroath and Angus has to offer its residents.

I feel that there will also be economic benefits for Angus if this application is approved as local jobs will be created within the retail park, local construction companies and suppliers will benefit from the construction phase along with Angus Council benefiting long term from the business rates income from this development.

There is already a retail park adjacent to the proposed site so the location is the most sensible location for this proposal.

Joseph Mitchell

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Case Officer: Ruari Kelly

Customer Details

Name: Ms Linzi McAlpine

Address: 102 Panmure Street Monifieth

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I fully support these plans. I think this would be a great boost for Arbroath and I would travel from Monifieth to the retail park instead of going to Dundee.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Carroll Gibson

Address: Brae of Downie 6 Old Downie Farm Carnoustie

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This can only be a good thing for the very struggling high street of Arbroath. It's creating so many much needed jobs and should give a huge boost to Arbroath's community in my opinion.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Kerry Bews

Address: 11 East Kirkton road Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I 100% support the proposed development of the retail park.

I can only see the benefits this development will bring from creating approx 200 desperately required jobs, financial boost, increased consumer footfall, tourism and much more.

I work within the "Westport village" and believe that the small bespoke businesses within would all greatly benefit from the increased consumer traffic, I do not believe any of the large proposed units to be in anyway competition to them.

I am also a local artist and again the increase of visitors, tourism that would be generated would greatly help support the art community bringing larger volumes of visitors to our exhibitions and art/craft events.

I think any local businesses that object to this development are being extremely short sighted and self centred, we need to care for our entire town and all its residents, communities, organisations and businesses within.

Do not use the zoning as a reason to block this, we already have approx 20% of zoned industrial manufacturing ground lying vacant!

I have resided in the town all my life, it breaks my heart to see it turn into the ghost town it now is, I yearn for the return of the bustling, buzzing, vibrant holiday town it once was and believe this retail park will help us achieve that.

Yours sincerely

Kerry Bews

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Elizabeth Anne Roy

Address: 62 Hill Street Monifieth Dundee

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I was quite disappointed to read in the Courier that this development had been refused. I used to visit Arbroath fairly regularly but not very much in recent years as the shopping options are so limited. The development sounded like it would attract quite a number of new retailers and if these were added to the existing retail park next door I would be much more likely to use it. It would certainly be a better option than visiting the Kingsway West retail park as Arbroath is much more convenient for me. I have a number of friends who live in Carnoustie and I know that they would much prefer having access to a good retail park in Arbroath rather one in Dundee. And if I am in Arbroath I would probably visit the High Street as well. Not every time but occasionally.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Grace Ewing

Address: 1 Braemar Garden Dundee

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Ann Annandale

Address: Woodville Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This planning proposal should be viewed as a positive step for Arbroath. Firstly the provision of 250 jobs would be a great boost to the economy, but it would also mean the town has so much more to offer visitors and residents alike. This could actually enhance the town centre too as more 'out of town' people (who perhaps don't know what the town already has to offer) would want to visit and shop in Arbroath, and the locals could shop on their door step. The knock on effect would be more footfall in the town centre for the more specialised requirements so that all the lovely independent shops, the existing high street shops and eating establishments could also profit from this venture. With the help of the council (and maybe a review of the parking restrictions and charges) the town centre and the new retail development could work in tandem so that everyone can benefit from this new opportunity.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Elaine Milne

Address: 2 Pine Glade Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Arbroath High Street has been in decline for some years. Arbroath is far from unique. This is a nationwide trend and Arbroathians need to move with the times and all accept that traditional shopping patterns have changed and are not coming back any time soon. We should therefore seize the opportunity to draw consumers to this new retail park which is bound to have spin off benefits for existing successful stores on the High Street and West Port. This development should therefore be permitted in my view.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs helen miln

Address: 5 Victoria Street Monifieth Dundee

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:I feel this development would add value to arbroath and encourage those from surrounding areas to travel in and use the new retail park. The ease of parking and general convenience would offer a pleasant opportunity to shop and spend time at eateries etc all in one area.

I understand that some argue that this development may impact on the town centre but the businesses who would operate in a retail park would most not likely choose to open in arbroath other than in a site like the new proposed retail park.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Kate Porter

Address: East Scryne Farm Carnoustie Angus

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Neil Ballantyne

Address: 11 Lauder rd Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:I honestly believe this project would be a massive boost for the local economy with regards to jobs and attracting people from the surrounding areas. We will continue to support the town centre but will no longer have to travel to Dundee to spend our money. It's the future for Arbroath and a nicer welcome to the town!

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Case Officer: Ruari Kelly

Customer Details

Name: Mr scott milne

Address: 2 Pine Glade Letham Grange Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Many said the marina at Arbroath harbour would not work and it should remain exclusively a working harbour. Since the marina was created it has been an unprecedented success. If this development was permitted yet more people would be drawn to Arbroath, not only from Carnoustie and Monifieth but from Montrose and Forfar as well. Arbroath itself already suffers from severe leakage to Dundee and beyond. This development represents progress and that is to be welcomed and encouraged in my view.

From:Ron Gardiner
Sent:1 Oct 2019 09:02:25 +0100
To:PLANNING
Subject:Arbroath retail development

Val=pjozrpcfjwjoo. Support for Arbroath retail development. Dear sirs/madam I wish to give my support to the above as it would encourage people to shop nearer to home cutting travelling and be more environmentally friendly, thank you Ron gardiner tillyhoit carmyllie dd1 12qz
Sent from my iPad

18/00975/FOLM
Iceland

Iceland Foods Limited
Second Avenue
Deeside Industrial Park
Deeside, Flintshire
CH5 2NW
United Kingdom

Tel: +44 (0)1244 830100

23rd September 2019

Development Management
Angus Council
Kirk Square
Arbroath
DD11 1DX

RECEIVED

01 OCT 2019

PLANNING & PLACE
COUNTY BUILDINGS

Dear Sir/Madam,

RE: Planning application made by Brakenbrae Investments Limited – Arbroath Retail Park

I refer to the above-mentioned application submitted by Brakenbrae Investments Limited, and am writing in response to the numerous published articles against the application.

The Food Warehouse now trades from over 100 stores across the UK with 10 open in Scotland with more under contract. All Food Warehouse stores trade on either Commercial Centres or stand-alone destination type locations. As a result, we would not open a Food Warehouse store within Arbroath town centre.


The proposed retail park is ideal for Food Warehouse in terms of its location, unit size and adjacent retailers. We believe we will bring additional footfall and a much-needed boost to the town as a whole.

We also feel a link should be created with the existing retail park to aid customer footfall across both locations which will assist all retailers, existing and proposed.

This, in addition to the 25 good quality new jobs for local people and the £1 Million plus investment that we will be making has to be seen as a good news story at a time of considerable economic uncertainty throughout the whole of the UK economy.

We trust that the planning committee will view the application in the same positive light and grant permission at the relevant committee meeting. I would be grateful if you could provide each of the councillors on the committee with a copy of this letter.

Kind regards



Matthew Vercell
Acquisitions Surveyor

Subject:

To: PLANNING

Subject: Arbroath retail Development

I am writing this email due to the Angus council planning portal being down and I wanted to offer my support for the retail development in Arbroath. I sincerely believe it would be a positive affect for the town and the surrounding areas in Angus. Whilst all towns and cities throughout the UK are presently experiencing economic problems on the high street, I do not feel this development should be rejected based on this reason. Shopping habits and footfall have been severely affected due to the ease of shopping on line not because there are retail parks.

The high street of Arbroath has its difficulties, however the stores planning on having a retail unit in this development would not be found on the high street and would therefore not impact on the present trade.

With this in mind and the large increase of job opportunities this will create for this local area, I believe this development is an excellent opportunity to give locals and visitors to Arbroath this choice. I am fully in favour of this retail park.

Yours sincerely

Mrs Lisa and Mike Mitchell.

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Case Officer: Ruari Kelly

Customer Details

Name: Miss Anne McKeown

Address: 23 Catlogie Road Carnoustie DD7 6EP

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I wish to give my full support to this application. it would be a missed opportunity for Arbroath on all sorts of levels if this development is not allowed to go ahead.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Brian Binnie

Address: Denfind Farm Monikie Dundee DD5 3PZ

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I believe that this proposed development would bring significant benefits to Arbroath & the surrounding area & I fully support the application.

01 October 2019

Dear Sir,

Proposed Costa Drive Thru, Arbroath. Planning ref; 18/00975/FULM

I write with reference to the above planning application which includes a Costa Drive Thru store. This is a location we strongly support, as the only suitable location for our Drive Thru store in Arbroath.

We require locations with good retail support and exposure to main traffic flows. This is the only location in Arbroath which satisfies these key criteria.

We are excited at the prospect of opening a DT in Arbroath. This is our key growth channel, creating approx. 18 full time equivalent roles, and creating a welcoming, comfortable in-store environment allied to the convenience of proximity to a retail park and the opportunity for commuters and visitors to the town to use the DT facility.

I hope you will look favourably on this application.

Yours sincerely

Tom Swords

Drive Thru Acquisitions Manager



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Case Officer: Ruari Kelly

Customer Details

Name: John Milne

Address: Annfield 1 Duke Street Brechin DD9 6JY

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I read with interest this development and the arguments to protect the high street which we all sentimentally share. Other influences like in Brechin the car parking charges has made the centre like a ghost town and has rendered the money spent on the high street not cost effective. I passed Lidl in Brechin when first built the huge car park for years largely empty then the 2008 credit crunch again an outside influence changed shopping habits and it is very busy since These are new businesses not yet present in Arbroath an attractive development is not about retaining the Arbroath shoppers only, but also attracting new shoppers into town.

I remember reading and could be wrong an independent report on development versus high street I do not recall there being a survey of the high street and it's prospects or viability and how long it can be sustained , this developement will retain diversity in Arbroath I am sure the future of the high street will continue to be visited no matter what other developements arise.

Rejecting such an opportunity adding more diversity I therefore cannot understand why stifling competition for shoppers not replication of high street businesses is the way forward. Competition in this case is not evident by the prospective businesses

In your argument to save high street outside circumstances can as I said erode any present decision and the grounds on which it was made very quickly this is a great opportunity for Arbroath no one knows the future but lets be proactive in building it with this developement which will also improve first impressions for anyone arriving from the west.

I would look forward to a greater experience in Arbroath with this retail park and then a visit to the high street subject to the parking cost/payment.

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Kevin Mackie

Address: Mackie Motors Nissan Montrose Road Arbroath DD11 5JP

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This is a wonderful opportunity to bring new employment to the town and drive footfall to Arbroath as opposed to allow the footfall to head west.

No matter what was done to save Betamax v VHS neither was destined to survive and unfortunately the retail world we live in today will continue to change and city centres will not survive in their current format..

Many city centres in smaller towns and cities in Europe have totally reinvented themselves and it's time we started doing the same in Scotland.

Many airports around the world are now out of town shopping centres and this trend will continue to develop..

I do hope the councillors take this opportunity to approve this plan and allow the whole of Arbroath to benefit through time..

Comments for Planning Application 18/00975/FULM

Application Summary

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Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Marta Janiak

Address: 51 Benedict Road Arbroath DD11 5EY

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: It's good opportunity for new jobs.

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Michael Krzyzanowski

Address: 287 Brechin road Arbroath DD11 4ba

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This opportunity will bring much needed jobs to the area and the high street can only benefit from more people staying in the area to shop and the high street must concentrate on improving itself with independent cafes and craft shops instead of trying to prevent more choice and offering to the people of Arbroath also more jobs means more money for people to spend in this development and the high street shops also.

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Monika Krzyzanowska

Address: 287 Brechin road Arbroath DD11 4ba

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: It's great opportunity to develop town, make it easier to live in, having more shops to choose from. It also come with more job opportunities which is nessecery in such small town.

Comments for Planning Application 18/00975/FULM

Application Summary

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs P Darcy

Address: 3 McIntosh Patrick Place Monifieth DD5 4LW

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I think the proposed retail park will be good for Arbroath, creating job opportunities for lots of people and bringing a wider choice of shops and food outlets to the local area



B & M Retail Ltd., Dakota Drive,
Estuary Commerce Park, Speke,
Liverpool L24 8RJ.

FAO Mr A Hunter
Manager – Developments Standards
Angus Council
Planning & Communities
Angus House
Orchardbank Business Park
Forfar
DD8 1AN

4th October, 2019

Dear Mr Hunter

Proposed Retail Premises (B&M Retail Ltd), Angus Retail Park Arbroath - Planning Application

I write in connection with the above where B&M Retail Limited are well advanced with the detailed legal negotiations in respect of an Agreement for Lease (subject to planning).

Arbroath is a priority town in Scotland for our B&M Homestore with garden centre format and thus I can confirm that B&M remain firmly committed to operating this type of store from the proposed development where we could deliver our full product range and offer.

It is worthwhile setting out as an overview that B&M operates a discount variety goods retail format, with competitive prices, and our business typically trades on narrow margins being reliant on flexible floorspace to meet our trading needs. Accordingly, the size of floorspace, configuration and a broad range of categories of goods permitted for sale are all critical. We wish to trade on a single floor with access to all goods on one level and accessibility by customers requiring trolleys is essential. We have previously reviewed a number of potential locations across Arbroath including the town centre however the proposals at Angus retail park offer the only viable opportunity for us.

From a B&M Homestore with garden centre the main ranges involve sales of bulky goods items including indoor and outdoor furniture, household goods, paint, wallpaper and DIY products, household textiles, garden equipment including barbeques and greening products including compost, fertilisers and similar garden items. In addition, the trading floor-space would also accommodate as part of our offer some non-food comparison goods items on an ancillary basis together with ancillary sales of food and drink items which all are fully integrated in our trading format along with the main product ranges.

I can confirm that a new B&M Homestore in Arbroath would bring forward a capital investment in excess of £400,000 into the town and would support up to a 50 new jobs.

In summary B&M Retail Ltd are fully supportive of the developer's proposed planning application.

Yours sincerely,


Iain Pratt
Property Acquisitions Manager

Comments for Planning Application 18/00975/FULM

Application Summary

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Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Kyle Gordon

Address: 3 Roseville Place Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:#

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Miss Laura Ballantyne

Address: 11 Lauder Road Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:Arbroath I feel this development would make a great impact on the town as there are not many exciting, modern shops on the high street. This development will bring many people into the town from carnoustie/montrose and other surrounding areas rather than going to Dundee. This will also bring an amazing amount of job opportunities to the public which is very much needed in this small town.

People are worried that this may affect the high street shops, however i feel the high street has been in decline for years and this is not going to have a major impact on the shops people have been going to for years.#

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Simon Miln

Address: 5 Victoria Street Monifieth Dundee

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: It's great to see people wanting to invest in Arbroath, I will definitely come to Arbroath on a more regular basis if this development goes ahead, the town has so much potential but it needs a bigger draw than it currently has and this type of development will certainly help. Towns and cities are changing, please make sure Arbroath doesn't get left behind. #

Asda/Arbroath
18 January 2019



Ruari Kelly
Angus Council

Sent via email: planning@angus.gov.uk and kellyr@angus.gov.uk

Dear Mr Kelly

**Planning Application 18/00975/FULM
Proposed Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works**

We write on behalf of Asda Stores Limited to object to the above application for planning permission submitted to Angus Council ("the Council") by Brackenbrae Investments Limited. Asda respectfully request that the application be refused.

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The Scottish Planning Policy ("SPP") is a material consideration in planning decisions. SPP carries a presumption in favour of sustainable development albeit this does not change the statutory status of the development plan as the starting point for decision making. The SPP seeks to ensure the vitality of Town Centres.

Asda consider that, as well as being contrary to the site's allocation in the adopted Local Development Plan (LDP), the proposals present a significant threat to the Town Centre's vitality and viability, due to the scale and nature of the scheme and should therefore be refused. We provide further justification to our objection below.

Contrary to site allocation

The Development Plan in respect of the site comprises the Angus Local Development Plan 2016 (LDP) and associated Supplementary Planning Guidance. The proposal site is identified on Policies Map as an 'Existing Employment site' where Policy TC14 is applicable.

Policy TC14 states planning permission will be granted for Class 4 (Business), Class 5 (General Industry) and Class 6 (Storage and Distribution) uses and that in these locations other uses may be supported if it is demonstrated that certain criteria are met. Asda object to the proposal as it is contrary to the following criteria:

Criteria	Our Response
<p>1. The proposal is complementary or ancillary to an existing or proposed employment use; or</p>	<p>The proposed development is for a retail park which will have no relationship other than physical proximity to the rest of the employment area to the north. As such it cannot be considered a complementary or ancillary use to the existing employment uses. The applicant, in their Planning and Delivery Statement, claims that this criterion is met through the close proximity to the Westway Retail Park. The wording of the policy is such that it is Asda's position that by 'employment use' the Council mean Class 4, 5 or 6 uses which are described within the policy. It is considered that this criterion is anticipated to cover such things as creches or cafés serving the day to day needs of people working in the employment area rather than the development of a retail park.</p>
<p>2. The loss of the site would not undermine the provision of employment land in Angus, or land which may be important to retain due to its individual characteristics, regardless of the amount of employment land available; and</p>	<p>The applicant has submitted information in an Employment Land Audit which concludes that the proposed development would have an 'inconsequential impact on the supply of employment land'. They go on to claim that this site has no unique characteristics which elevate its primacy for employment use. What the report fails to recognise is that this site is highly prominent on the approach road (Dundee Road) into Arbroath and therefore it is of high quality. It is accepted in numerical terms that this site wouldn't have a huge impact on the overall supply of employment land but Asda argue that it would have a huge impact on the supply of <u>high quality, prominent</u> employment land.</p>
<p>3. The proposal would not undermine the operation of existing or proposed employment uses on the whole allocation or existing employment area; and</p>	<p>The loss of this employment site would undermine the Council's aspirations for this area of Arbroath which have been confirmed through the continued allocation of the employment site and the allocation of site A10 to the north west. In the supporting text on page 81 of the LDP it states that "Kirkton and Elliot Industrial Estates continue to provide a range of sites and premises for a variety of employment uses at</p>

	accessible, serviced locations at the southern and northern entrances to Arbroath.” Clearly the Council see these combined allocations as a good quality location for employment uses and as such the loss of the application site to retail would undermine the key role this area plays.
4. There is no unacceptable impact on the built and natural environment, surrounding amenity, access and infrastructure; and	Asda’s highways consultants are reviewing the application on Asda’s behalf and will be submitting further comments separately. This will set out concerns relating to the highways impact of the proposal.
5. If relevant, the proposal is in accordance with Policy TC19 Retail and Town Centre Uses.	See further comment below

Policy TC14 then requires applicants to submit evidence which identifies the length of time the site has been marketed for employment use and the forms of marketing undertaken. A letter has been provided by Graham + Sibbald which confirms they were instructed in early 2017 to market the site. This is only less than two years in a period which has seen uncertainty, not least from Brexit. This is a relatively short period of time and it may be that confidence will return to this sector in the near future. It is also worth noting that there is no mention of a marketing board being erected on site which would be an opportunity to highlight the site to passing traffic. The Graham + Sibbald letter does not provide any further detail on what actual marketing was undertaken and how often other than to say ‘electric mailshot to local, regional and national agents along with industrial developers and occupiers’. No information is provided as to whether this was monthly or whether just once. It is Asda’s case that the applicant has not provided sufficient evidence to satisfy this policy.

Retail Impact

Turning to retail policy, policy TC19 of the LDP states that applications for retail outside designated town centres for proposals of 1,000sqm or above will be required to submit relevant assessments relating to sequential approach to site selection, impact on vibrancy, vitality and viability of any town centre, tackling deficiency in existing provision and to show compatibility with surrounding land uses.

Asda is concerned that the level of retail impact shown on the Town Centre in the Retail Statement is underestimated by the applicant. The applicants have used benchmark turnover figures for their proposal which we do not consider show the true potential impact of the proposal. This is because the Planning Statement submitted with the application does specify that it will be a discount foodstore retailer (albeit no operator is named) in one of the units and the impact calculations have been prepared on the basis of a sales density for such an operator. However what is being sought is planning permission for a foodstore unit and comparison goods units which could ultimately be occupied by any retailers. In determining this application the Council needs to be satisfied with the use of the land as retail space not the use of the land by specific retailers. As such it would be prudent to undertake

a sensitivity test using other retailers' densities or an average to give a clear indication of potential impact on the other centres in the area which are, of course, protected under planning policy.

The applicant suggests that discounters' trading philosophies differs from a traditional supermarket by selling from a limited core range (compared to other supermarkets) of mainly exclusive own labels. However, whilst this may have been the original philosophy of the 'deep discounter' it is evident that there has been a slow but steady change towards that of a traditional supermarket when considering store size, ranges on offer, proportion of comparison goods, and labelled goods. This would be reflective in the turnover being more akin to that of other foodstore operators.

Furthermore, the application refers to the proposal being for a 'limited assortment discounter' but in fact the application is for Class A1 retail which could in theory be occupied by any retailer. Discounters' trading philosophies should not be a material consideration in this instance.

The convenience goods impact shown in the RIA are already at 10% for Arbroath Town Centre. The Council should request that the applicants assess a further scenario to show a higher turnover food retailer and a range of other comparison goods retailers to be able to review the full potential impact of this proposal and to use appropriate figures rather than benchmark. The Council need to be content that they are considering a certain level of food and non-food retail floorspace in units which are attractive to traditional high street retailers. In addition to the attractiveness to retailers, the scheme will also draw shoppers away from the Town Centre which will impact on the level of associated linked trips to other services and facilities in the town.

Summary

It is requested that the Council refuse this application; the impact that this proposal will have on the Town Centre is significant in relative terms given the total quantum of retail and the potential for Town Centre tenants to relocate.

The levels of impact shown by the applicants are underestimated and it is strongly recommended that the Council seek further scenarios to be assessed so that they can consider the true potential impact of this development.

The proposal is contrary to the site's allocation in the adopted Local Development Plan.

I look forward to receiving confirmation of receipt of this objection.

Yours sincerely



Katherine Sneed MRTPI
Director

Ruari Kelly
Planning Officer
Angus Council

Sent via: kellyr@angus.gov.uk



18th January 2019

Dear Ruari

18/00975/FULM | Proposed Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

The above planning application was registered on 17th December 2018; a Transport Assessment, prepared by Fairhurst, was submitted alongside the application, which seeks permission for a new retail park to the south west of Arbroath. Further detail in regards to specific operators is not provided within the TA, however, it is suggested that the following has been used as the basis of the assessment (**Table 1**).

Table 1 – Breakdown of Development Proposals

Retail Park	GIA (m ²)	Land Use
Unit A	1786	Discount Food Store
Unit B	650	Non Food Retail
Unit C	650	Non Food Retail
Unit D	650	Non Food Retail
Unit E	1022	Non Food Retail
Unit F	1124	Food Retail
Unit G	2137	Variety Store
POD 1	139	Fast Food
Drive Thru 1	255	Drive Thru
Drive Thru 2	167	Drive Thru
Total	8580	

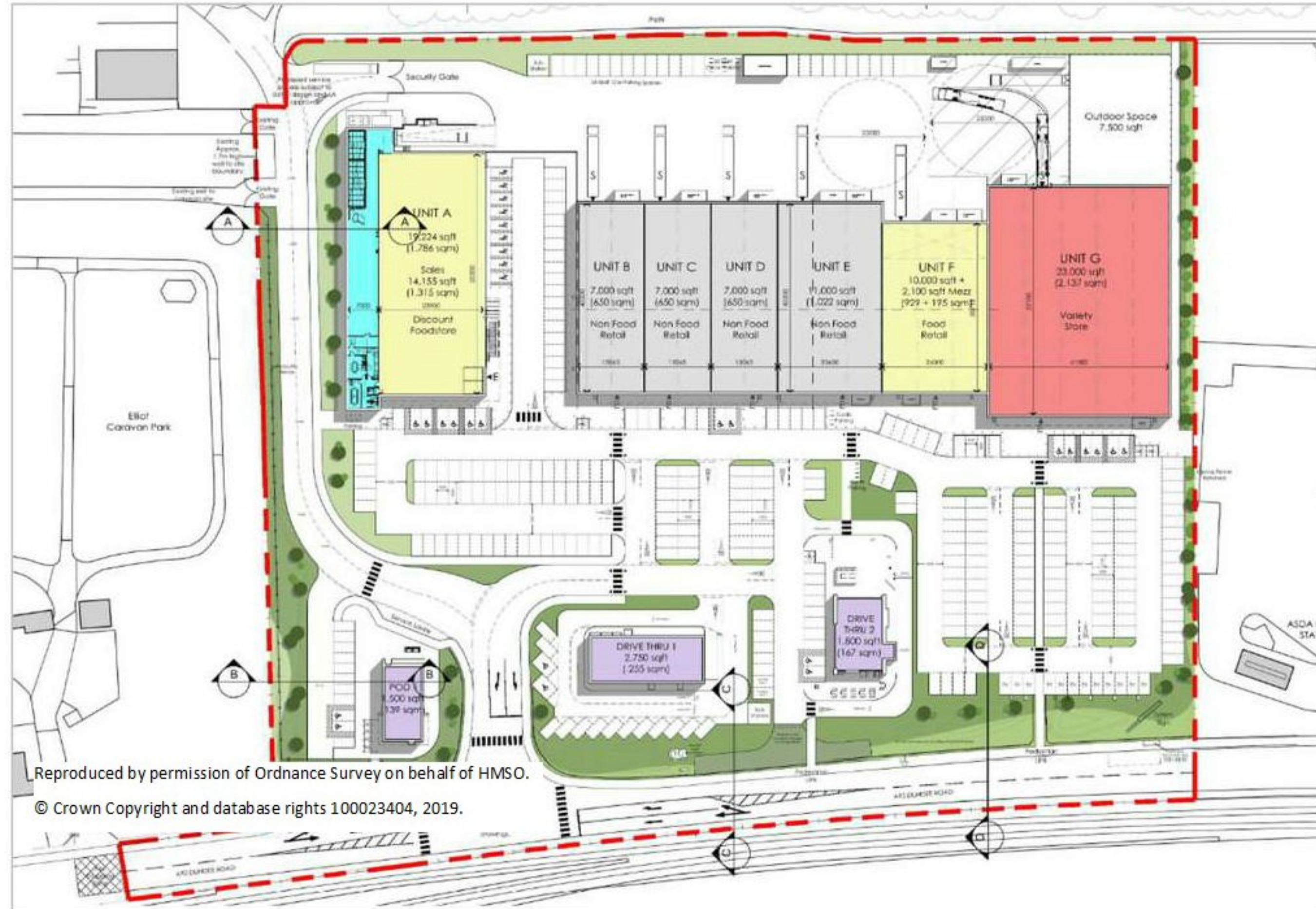
(Source: Submitted Transport Assessment)

Figure 1 illustrates the site layout; the development proposals include 334 car parking spaces, with access taken from a new signalised junction onto A92 Dundee Road (and the stopping up of the existing site access at the western end of the site); the TA notes that this will ensure that 'appropriate



visibility can be achieved and all required manoeuvres, including service vehicles, can take place at the junction.'

Figure 1 – Development Site Layout



On behalf of ASDA Stores Ltd. (ASDA) we have reviewed the submitted Transport Assessment, with a view to ensuring that the operation of the local road network and road safety is not unduly and detrimentally impacted by the proposed development, and that all planning matters are duly considered.

This review has highlighted a number of serious concerns / omissions, which form the basis of ASDA's formal objection to the application on highway grounds; these are summarised below.



Trip Generation Methodology

The TA indicates that the development proposals would be expected to generate the level of trips presented in **Table 2**, below, in the weekday AM and PM peak hours.

Table 2 – Development Trip Generation

	Arrivals	Departures	Two-Way
AM Peak	111	60	171
PM Peak	318	314	632

Firstly, we would question the approach to determining the likely trip generation of the development – the Transport Assessment states that the TRICS category 'Retail Park with Food' has been used for all elements of the application, with the exception of the 3 x fast food / drive-thru units. However, a review of the sites used in the assessment, indicates that all pre-date 2001 and, more importantly, none includes a Lidl / Aldi, which it is envisaged might be the end user for Unit A. **Table 3**, below, summarises the sites selected, for ease of reference.

Table 3 – TRICS Sites used in Transport Assessment

Site Ref.	Date of Survey	Retailers on Site	GFA
F1-01J-01	1993	Asda (inc PFS), Focus, Currys and Carpetwise	16,000sqm
F1-01-J-02	1997	Homebase, Halfords, PetSmart, Textyle World, Currys, Landmark, General George, Sterling, Sainsbury's, McDonalds, PFS	18,720sqm
GM-01-J-01	1998	Not specified	12,000sqm
H1-01-J-01	1998	Sainsbury's, Mothercare, Tiles R Us, PFS	8,845sqm
NE-01-J-01	1990	Not specified	12,100sqm
NF-01-J-01	1990	Allied Carpets, Do-it-all, MFI, Tesco, Little Chef, Carpetland	14,924sqm
ST-01-J-01	1995	Not specified	16,118sqm
WK-01-J-01	2000	Frankie and Bennys, KFC, Halfords, Harveys, Rosebys, Sainsbury's, Carpet Right, Brantano Footwear, MFI, Allied Carpets and Great Mills	19,128sqm

The retail market, and indeed the food retail market, has seen dramatic and significant operational changes in recent years. Indeed, recent Kantar data (Dec 2018) shows that the top four of Britain's biggest grocers (Tesco, Sainsbury's ASDA and Morrisons) now collectively account for 69.8 per cent of the UK grocery market, which is down from 71.6 per cent just two years ago (Dec 2016). Similarly, discount food retailers Aldi and Lidl increased their market shares from 6.0% to 7.4% and 4.4% to 5.4% over the same time period, making them the UK's 5th and 7th largest retailers, respectively.



It is likely then that Unit A (which it is understood will bring a new retail offering to the local area, based on the Retail Impact Assessment) will be a significant trip attractor and, as such, the lack of TRICS sites of a comparable nature used in the TA is a concern. Indeed, we anticipate that the trip rates used will significantly underestimate the impact of the proposals, and specifically the food retail component.

In regards to the 3 x Drive Thru / Fast Food units, depending on the final operator, the level of trips has the potential to differ significantly. Our experience suggests that Drive Thru coffee shops generate significantly more peak hour trips (particularly in the morning) than a typical fast food restaurant and this should, therefore, be borne in mind.

In light of the above, we would respectfully suggest that the Council requests a review of the trip generation methodology in order to more accurately reflect the likely demand, specifically, in relation to the discount food store element of the scheme. We would consider that a more appropriate methodology might be to consider the food retail component as a separate entity (in a similar way to the assessment of the Drive Thru and Fast Food units) and then to consider the likely interaction between this and the other retail park uses (as it is accepted there will be some shared trips). Reference should be made to TRICS Research Report 14/1 and should there be no recent, comparable discount food retail sites in TRICS (in terms of site location, levels of accessibility etc.) then surveys should be undertaken at representative sites and the results of these used to inform the assessment.

In light of the above, we would assert that the Transport Assessment has not adequately demonstrated the likely impact of the development proposals and, as such, is deficient.

Assessment Periods

The Transport Assessment includes no assessment of the Saturday peak, rather the assessment is limited to the weekday AM and PM peak hours. Whilst this approach has been scoped out with the Council, we'd strongly disagree with the Saturday peak having been disregarded, indeed, it is typical for assessments of new retail development to require a Saturday assessment, with this being recognized as a busy shopping day. This is particularly relevant in this case, given that there is a neighbouring retail park (Westway) that will likely have a similar peak profile to the proposed development.

In light of this, we have interrogated the TRICS database (using the 'Retail Park with Food' category included in the Transport Assessment), in order to derive trip rates for the Saturday peak. The parameters used (set out below), mirror those within the submitted Transport Assessment, albeit the size range has been amended to more accurately reflect the GFA of the development (8,289sqm, based on the TA).



Category: Retail;
 Sub-Category: Retail Park with Food;
 Size Range: 4,500 – 16,500sqm (GFA);
 Date Range: 01/01/00 – 07/11/15;
 Areas: East Anglia, West Midlands, Scotland, North West, Yorkshire & North Lincs; AND
 Locations: Suburban Area, Edge of Town.

Notwithstanding our previous comments in regards to the validity of the trip-rate methodology, our assessment indicates that the development-related traffic levels would be higher during the Saturday peak (1200 - 1300), than the trip rates used for the weekday PM peak, as shown in **Table 4**, below. The trip rates derived by TPS have been appended for clarity.

Table 4 – Comparison of Weekday PM and Saturday Trip Rates

	PM			Saturday		
	Arrivals	Depts	Two-Way	Arrivals	Depts	Two-Way
Trip Rates from TA	3.603	3.562	7.165	-	-	-
TPS Calculated Trip Rates	-	-	-	4.675	4.741	9.461

The application of the above trip rates to the GFA of the retail park (excluding Drive Thru / Fast Food units) is shown in **Table 5** – this clearly demonstrates that the development would be likely to generate a significantly higher number of trips (+186) in the Saturday peak, as compared with the weekday PM peak. There are no details of baseline traffic data for the Saturday and, therefore, we can't be confident that the Saturday development trips would not result in capacity issues at either the site access or on the wider highway network. We would, therefore, request that a Saturday peak assessment is carried out (taking into account our earlier comments in regards to revised trip rate methodology, with reference to the food retail, particularly).

Table 5 – Comparison of Weekday PM and Saturday Traffic Generation (Gross)

	PM			Saturday		
	Arrivals	Depts	Two-Way	Arrivals	Depts	Two-Way
Traffic Generation from TA	299	295	594	-	-	-
TPS Calculated Traffic Generation	-	-	-	387	393	780

Servicing

Servicing for the retail park is to be taken via a new signal controlled junction from A92 Dundee Road. The existing minor road at the western boundary of the site (which currently provides an egress from



the adjacent Elliott Caravan Park) is to be realigned, such that it forms the minor arm of a priority T-junction with the retail park customer access, as shown in **Figure 1**.

Based on the Transport Assessment, there is nothing to suggest that vehicles egressing the Caravan Park will not continue to use this route. Reference to the Elliott Caravan Park website suggests this predominantly offers static caravan holidays, as well as a small number of touring pitches. Google earth suggests there are c. 120 static caravans and a cattery also operates on the site. As such, during the weekends and holiday periods, particularly, there could potentially be a significant number of trips egressing the site onto the service access road (at the location shown in **Figure 2**), which would be in conflict with HGV deliveries to the retail park.

Figure 2 – Elliott Caravan Park Egress Onto Service Access Road



The TA provides no information on how the service yard will operate or the volume of deliveries anticipated – given there are multiple retailers served from a shared yard, and staff parking (25 spaces) is also provided here, we would request that further details should be submitted in order to ensure that conflicts between deliveries, or between deliveries and staff vehicles can be understood (from a safety perspective).

Similarly, tracking should be provided to ensure that the delivery bays can be serviced simultaneously, specifically, we have concerns as to whether the unit A delivery bay can be accessed when unit B is being serviced. A Servicing Management Plan should be prepared and submitted for review.

This should also set out how servicing of the three Fast Food / Drive Thru units will be undertaken; the Fast Food unit is shown to have a delivery bay to the immediate north, however, it is unclear how a delivery vehicle using the bay would then turn in order to leave the site, without needing to reverse onto the service road (and thus potentially causing conflict with other deliveries and / or staff vehicles). It is not clear how the Drive Thru units will be serviced.



No swept path analysis is provided within the TA, either for internal manoeuvres within the site (including to / from / within the servicing yard) or at the site access. It is, therefore, not possible to determine whether the swept path of a delivery vehicle could be accommodated. We would request that a fully marked-up plan of the access arrangements should be provided, together with a suite of tracking drawings showing:

- Vehicles entering / egressing the site via the new signal controlled junction on A92 Dundee Road, to / from all directions;
- Negotiating the manoeuvre to / from the signal-controlled junction to the servicing access road;
- Manoeuvring within the service yard, noting previous comments regarding simultaneous servicing of the various units; and
- Servicing of the 3 x Drive Thru / Fast Food units, as well as tracking of a state car, mini-bus and transit van (reflecting a reasonable profile of customer vehicles).

Materiality & Operational Assessments

The TA suggests that where the development is likely to result in a 5% or greater uplift in traffic on any junction in the study area, operational assessments have been carried out. It states that this has been agreed with the Council, however, we have a number of concerns in this regard, which are summarised below:

- **This approach is contrary to TAG guidance, which suggests that the significance of impact is relative to existing junction / network operation, and thus a much lower percentage uplift (as a result of development) might be considered material.** Further consideration should be given to the current and future operation of individual junctions within the study network identified within the TA, in the first instance, and the results of these assessments then made available for review, in order to determine where the development proposals might be regarded as having a material impact;
- **The development trip generation proposed within the Transport Assessment is questionable (for the reasons outlined previously) and we would consider that it likely underplays the impact of the development.** As such, the percentage increase is likely to be higher than reported and thus the materiality assessment should be re-run following appropriate (and agreeable) revisions to the trip generation methodology;
- **The materiality assessment has not been undertaken for a Saturday, despite the development resulting in a high volume of trips during the Saturday peak** – no Saturday base traffic flows are available and thus it is not possible to determine the percentage uplift, as a consequence of the development proposals. We would request that traffic data (including queue length surveys) is gathered for a typical Saturday in a neutral month and that this is used to model



the current situation and future anticipated operation of each junction in the study area (with the inclusion of committed development). The junctions on the network where the development will likely have a material impact during the Saturday peak can then be confirmed.

Operational Assessments

We would suggest that, in light of our earlier comments, the operational assessments do not accurately reflect the impact of the development proposals and should be revised accordingly, with the results made available for review.

To enable review of the operation of the proposed signal controlled access junction with the A92, we would request a fully marked-up layout of the junction, together with details of the LINSIG modelling software inputs (geometries, proposed signal timings). We would note from a review of the information provided that the junction has been modelled without the inclusion of a controlled pedestrian crossing on the site access arm, despite the fact that this is likely to be a key desire line from the neighbouring Caravan Park and that a signed shared use walking / cycling facility runs past the site access on the northern side of the A92 Dundee Road (linking into the Arbroath Active Travel Network at the Westway mini-roundabout). We would suggest that there should be a requirement placed on the developer (from a highway safety point of view) to incorporate controlled crossing facilities on the site access arm and that the operational assessments should be re-run with this incorporated into the signal timings.

Aside from this, we would also note that there appears to have been no validation of existing queue lengths; given that a number of junctions assessed are at or nearing capacity, we would request that queue length surveys are undertaken to ensure that the capacity assessments accurately reflect what happens on the ground currently, allowing the impact of the proposals on junction capacity to be fully understood.

Furthermore, there has been no consideration given to the interaction between individual junctions. Given the scale of development, the existing capacity issues that have been highlighted by the TA, and the fact that the proposals introduce a new signal controlled junction on the A92 between two existing roundabouts, that already experience high volumes of traffic, we would suggest that the TA should consider potential for blocking back between junctions and the impact this might have on network operation.

Summary

On behalf of ASDA Stores Ltd, TPS has reviewed the Transport Assessment and supporting information, prepared by Fairhurst in reference to a proposed retail park at A92 Dundee Road, Arbroath. In light



of our review, we have highlighted a number of concerns. In summary, we would draw your attention to the following key points:

- The trip generation methodology is questionable; TRICS sites used are not comparable with the proposed development (in terms of development make-up) and are outdated. We have concluded that the trip generation used in the assessment is likely to significantly underestimate the impact of the proposals and should, therefore, be reviewed;
- In addition, the TA includes no consideration of the Saturday peak – our review of TRICS suggests the development impact is likely to be more pronounced on a Saturday and thus (as is standard practice), we would request that a Saturday assessment is undertaken;
- A Servicing Management Plan, together with swept path analysis should be provided – the TA includes no details of delivery numbers, timings or, indeed, whether the swept path of delivery vehicles can be accommodated, either at the site access or internally;
- A fully marked-up plan of the proposed access junction should be provided, to allow the layout to be reviewed in the context of standards; to address road safety concerns, a signal controlled crossing should be incorporated into the site access arm. The layout should then be reflected in the operational assessments of the site access;
- Materiality assessments within the TA currently use a threshold of a 5% uplift in traffic at any given junction as a trigger for further assessment. However, this is contrary to TAG guidance, which suggests a lesser uplift can be regarded as material where existing capacity issues exist. Given that a number of the junctions local to the site have been shown to experience capacity issues currently (or in the future with committed development added), we would request that the materiality thresholds are reviewed; and
- Operational assessments should be re-run taking into account all concerns highlighted in this objection, with the model inputs and results made available for review.

Given the above, it is considered that the supporting highways documentation, associated with the application, is deficient. As such, the Council cannot reasonably arrive at a well-considered and sound planning decision. The planning application should, therefore, be refused on highways grounds.

Yours faithfully

Georgina Stares – Director

TPS Transport Consultants Ltd

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26 February 2019

NORTH PLANNING & DEVELOPMENT

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FAO: RUARI KELLY

Dear Sir / Madam,

PLANNING APPLICATION 18/00975/FULM: PROPOSED RETAIL DEVELOPMENT, COMPRISING FOOD AND NON-FOOD UNITS (CLASS 1), DRIVE THROUGH UNITS (CLASS 3 AND SUI GENERIS) AND ANCILLARY DEVELOPMENT INCLUDING ACCESS, DRAINAGE, LANDSCAPING AND OTHER ASSOCIATED WORKS ON LAND AT FACTORY ELLIOT INDUSTRIAL ESTATE, ARBROATH, DD11 2PT.

OBJECTION SUBMITTED ON BEHALF OF THE CO-OPERATIVE GROUP

On behalf of our client, the Co-operative Group (Co-op) we hereby submit the following objection to the above planning application submitted Brackenbrae Investments Ltd.

As you will be aware, Co-op are a key investor and stakeholder in Angus Council town centres, operating food stores across the Council area, including the following convenience stores:

- Co-op, Arbirlot Road, Arbroath
- Co-op, Mayfield Terrace, Arbroath
- Co-op, High Street, Carnoustie
- Co-op, Barry Road, Carnoustie

Having reviewed the submitted application, Co-op have significant concerns with the proposed out of centre retail park. The key points of our client's objection can be summarised as follows:

- **The development of up to 9,217 sqm of Class 1 retail floorspace at Elliot Business Park would cause significant harm to the vitality and viability of Arbroath and Carnoustie town centres. The applicant's submitted retail information significantly underestimates the impact of the proposals.**
- **The SDP and LDP support improvements to Arbroath and Carnoustie town centres. The development plan's strategy for these town centres would be fundamentally undermined by the proposed out of centre retail development.**
- **The application proposals will fundamentally undermine the application site's employment land allocation allocation, undermining its attractiveness as an established location for business and industry.**



The following sections of this objection provide an assessment of the application proposals against the relevant development plan policies and other material considerations.

APPLICATION PROPOSAL

The submitted application seeks full planning permission for a retail park development, proposing 8 new retail units together with two drive thru premises and surface level car parking. The proposed retail floorspace extends to 9,217 sqm (gross) with the 8 retail units ranging between 139 sqm and 2,833sqm in size. It should be noted that this is more than all the existing convenience goods floorspace in Arbroath town centre.

At this time, the operator of the proposed retail floorspace is unknown although the submitted papers indicate that some of the proposed floorspace would be occupied by a 'discount' retailer. However, there is no guarantee that this would be the case and if consented the proposed floorspace could be occupied by any retailer or potentially combined to form fewer units with larger floorplates.

PLANNING POLICY

The development plan relevant to the application site comprises the approved TAYplan Strategic Development Plan (SDP) and the adopted Angus Local Development Plan (ALDP).

TAYplan Strategic Development Plan (June 2012)

The SDP sets out the following vision for what the Tayplan region should be like in 20 years' time:

"By 2032 the TAYplan region will be sustainable, more attractive, competitive and vibrant without creating an unacceptable burden on our planet. The quality of life will make it a place of first choice where more people will choose to live, work, study and visit, and where businesses choose to invest and create jobs."

Arbroath is identified in the SDP as a Tier 2 settlement. The SDP explains that these settlements are principal settlements which have the potential to make a major contribution to the regional economy but will accommodate a smaller share of the additional development.

The SDP gives specific consideration to retailing, advising that the TAYplan region is home to numerous town centres of different scales and economic significance with a diverse range of activities. The SDP advises that all centres function as part of a network within which people access services, work or visit and where businesses operate. The SDP explains that protecting and enhancing the vitality and viability of all centres, and particularly town centres, directly contributes to providing good quality places and to the region's economic competitiveness. It adds that the mix and quality of town centres and their land uses have a critical role in delivering the vision and objectives of the SDP.

Arbroath is identified in the SDP as a 'Larger Town Centre'. **Policy 5 'Town Centre's First'** seeks to protect and enhance the vitality, viability and vibrancy of the region's city and town centres. The policy explains that strategies, plans, programmes and development proposals should focus land uses that generate significant footfall in city/ town centres defined in the network of centres ahead of other locations. The policy also requires planning decisions for land uses that generate significant footfall to follow the sequential approach to site selection as contained in Scottish Planning Policy (SPP).

Angus Local Development Plan (September 2016)

The Angus LDP (ALDP) was adopted by Angus Council in September 2016 and the proposals map of the ALDP identifies that the application site lies outwith Arbroath town centre, forming part of a wider employment land allocation 'Existing Employment Site' where Policy TC14 is applicable

NPD1: Extract from Angus LDP Arbroath Proposals Map



Source: Angus Council

Policy DS1 'Development Boundaries and Priorities' of the ALDP considers development proposals within defined settlement boundaries and as such is of relevance to the submitted application. The policy advises that all proposals will be expected to support delivery of the LDP Development Strategy, explaining that the focus of development will be sites allocated or otherwise identified for development within the Angus Local Development Plan, which will be safeguarded for the use(s) set out.

The application site is not allocated for retail use and Policy DS1 establishes that proposals for alternative uses will only be acceptable if they do not undermine the provision of a range of sites to meet the development needs of the plan area. Policy DS1 also advises that proposals on sites not allocated for development, but within development boundaries will be supported where they are of an appropriate scale and nature and are in accordance with relevant policies of the ALDP.

The scale and nature of the proposed retail development will have a significant detrimental impact on the vitality and viability of Arbroath town centre and therefore runs contrary to the retail policies of the ALDP. We have explored this further in the following sections of this objection, but it supports our view that the application proposals are contrary to Policy DS1 of the ALDP.

Policy TC14 'Employment Allocations and Existing Employment Areas' advises that within employment land allocations and existing employment areas, planning permission will be granted for Class 4 (Business), Class 5 (General Industry) and Class 6 (Storage and Distribution) uses. The policy explains that in these locations, other uses may be supported if it is demonstrated that:

1. The proposal is complementary or ancillary to an existing or proposed employment use; or

2. The loss of the site would not undermine the provision of employment land in Angus, or land which may be important to retain due to its individual characteristics, regardless of the amount of employment land available; and
3. The proposal would not undermine the operation of existing or proposed employment uses on the whole allocation or existing employment area; and
4. There is no unacceptable impact on the built and natural environment, surrounding amenity, access and infrastructure; and
5. If relevant, the proposal is in accordance with Policy TC19 Retail and Town Centre Uses.

The policy also explains that to meet the requirements of points 1, 2 and 3, evidence shall be submitted with the planning application to identify the length of time the site has been marketed for employment use; the forms of marketing undertaken; the inter-relationship of the site with adjacent employment land, and with strategic and local transportation infrastructure; and potential impacts of the future use and occupation of adjacent employment land.

In considering each of the above criteria we comment as follows:

1. *The proposal is complementary or ancillary to an existing or proposed employment use*

The proposed development of a retail park at Elliot Industrial Estate would be neither complementary nor ancillary to the wider business park. The proposals would result in the loss of a key employment site which occupies a highly prominent position on the western approach to Arbroath. Its development as a retail park would prevent it from coming forward for Class 4, 5 and 6 uses which would complement the existing businesses at Elliot Business Park.

It is also clear that the development of 9,217 sqm of Class 1 retail floorspace cannot be considered as being ancillary to the existing or proposed employment uses at Elliot Business Park. 'Ancillary' is taken as being directly linked to the existing business uses and the proposed retail park, with no named operators, is evidently not ancillary to the existing uses which form part of the established business park.

2. *The loss of the site would not undermine the provision of employment land in Angus, or land which may be important to retain due to its individual characteristics, regardless of the amount of employment land available;*

The application site forms part of the Elliot Business Park, one of only two employment land allocations in Arbroath, which is defined in the SDP as a Tier 2 principal settlement. The application site has direct frontage to the A90, an important trunk road and is on the main route into Arbroath itself. On this basis, we contend that the application site is the most visible and prominent employment site in Arbroath and because of these characteristics, it is important to retain this site in employment use, regardless of the amount of employment land available, as is required by Policy TC14.

3. *The proposal would not undermine the operation of existing or proposed employment uses on the whole allocation or existing employment area;*

The loss of the most prominent employment site in Arbroath would undoubtedly undermine the wider employment area allocation, reducing the availability of employment land within the allocation and impacting upon its attractiveness as a location for business and industrial uses.

4. *There is no unacceptable impact on the built and natural environment, surrounding amenity, access and infrastructure; and*

On this particular point, it is accepted that the proposed development is unlikely to give rise to impacts which could not be mitigated. However, we are aware of the comments made by TPS on behalf of Asda (January 18th 2019) and we would endorse their views regarding the deficiencies of the submitted application in respect of transport matters.

5. *If relevant, the proposal is in accordance with Policy TC19 Retail and Town Centre Uses.*

In terms of assessing the proposals against Policy TC19 Retail and Town Centre Uses, this is given detailed coverage below.

In terms of retailing, ***Policy TC17 'Network of Centres'*** advises that Angus Council will seek to protect and enhance the scale and function of the centres as set out in Table 2 of the plan. Table 2 of the ALDP identifies Arbroath town centre as a 'Larger Town Centre, explaining that it provides the location for larger scale developments and the main comparison shops whilst also providing local services, community facilities and convenience shops which serve local communities. Policy TC17 explains that a town centre first policy will be applied to uses including retail, commercial leisure, offices, community and cultural facilities that attract significant numbers of people.

Policy TC19 'Retail and Town Centre Uses' advises that proposals for retail and other town centre uses 1,000 sqm gross outside of defined town centres are required to submit relevant assessments (including retail / town centre impact, transport and sequential assessments) where it is considered that the proposal may have a significant impact on the vibrancy, vitality and viability of any of the town centres in Angus.

The LDP seeks to '*protect and enhance*' Arbroath and Carnoustie town centres and the development of over 1000 sqm of Class 1 retail floorspace, with a focus on convenience goods retailing, on an out of centre site will seriously undermine the aims and objectives of the LDP as it will have a very significant impact on the vitality and viability of Arbroath and Carnoustie town centres.

The application site is an out of centre site, occupying a prominent location adjacent to an existing Asda foodstore, only 1.2 miles from Arbroath town centre and 5 miles from Carnoustie. Given the proximity of the application site to these important town centres, issues relating to retail impact are of paramount importance.

We note that the applicant has submitted a retail statement which includes their retail impact analysis of the application proposals. Having reviewed this submission, it is evident that it significantly underestimates the impact of the proposed development on the Council's network of centres.

In the first instance, the submitted study assumes that proposed Unit A would be operated by a non-specified 'discounter'. However, the submitted application seeks permission for 9,217 sqm of Class 1 retail floorspace and one cannot assume that any of the proposed floorspace would be operated by a discount retailer or any other retailer for that matter. Therefore, the planning authority must assume the 'worst case' scenario in terms of the turnover of the proposed retail floorspace and its associated impacts.

Table 9 of the submitted study considers the potential turnover of the proposed retail floorspace and the study advises that the turnover rates applied are based upon the applicant's 'occupier aspirations'.

As already discussed, there is no guarantee that any of the proposed floorspace would be operated by a discounter. As such the impacts of the proposed retail floorspace should be properly tested, based on the established company average levels for convenience goods retailers rather than the applicants 'aspirations'. In terms of current company average turnover rates for convenience stores these are as follows:

NPD2: Company Average Turnover Rates for Leading Convenience Retailers

Operator	Convenience Goods Company Average Turnover (£ per sqm)	Comparison Goods Company Average Turnover (£ per sqm)
Asda	£14,000.00	£7,000.00
Tesco	£14,000.00	£7,000.00
Morrisons	£14,500.00	£7,250.00
Aldi	£11,091.00	£9,061.00
Lidl	£8,592.00	£4,042.00
M&S Foodhall	£9,500.00	£0.00
Average	£11,947.17	£5,725.50

Source: Retail Rankings 2018 and Aldi / Lidl retail impact assessments

The same principle applies to the proposed comparison goods floorspace and we note that the submitted retail study assesses the proposed non-food floorspace on the basis of an 'average' rate (Approx £3400 per sqm) drawn from Harveys, JD Sports, Wilko, Mothercare and Arcadia. However, when one considers that other comparison goods retailers such as Boots, Superdrug, Argos and Brighthouse have turnover rates between £4,200 and £16,000 per sqm, the applicant's suggested turnover rate is considered to be very low and we consider that it would be more appropriate to test the proposed comparison goods floorspace on a higher rate.

The applicant has also assumed that 25% of the proposed retail park's trade would be derived from outwith the catchment area as illustrated at Appendix 4 of the submitted study. This assumption only serves to further suppress the applicant's assessment of retail impact and while the application site occupies a prominent position on the main route into Arbroath, the primary catchment area defined by the applicant is extensive and it is considered highly unlikely that the proposals will draw 25% of their trade from outwith this catchment. Our view is that the proposals will have a more localised trade

draw, with almost all of the trade derived from the defined primary catchment. At best, 10% of the total trade might come from outwith this area.

Using the above information, the turnover of the proposed retail floorspace is estimated to be as follows:

NPD3: Estimated Turnover of Proposed Retail Floorspace

Convenience	Sales Floorspace Convenience (sqm)	Sales Floorspace Comparison (sqm)	Sales Density (£ per sqm)	Total Turnover (£m)	Turnover from Catchment (£m)
Unit A	1052	0	£11,947	£12.57	£11.31
Unit B	0	0	£0	£0.00	£0.00
Unit C	0	0	£0	£0.00	£0.00
Unit D	0	0	£0	£0.00	£0.00
Unit E	0	0	£0	£0.00	£0.00
Unit F	885	0	£11,947	£10.57	£9.52
Unit G (Part)	481	0	£11,947	£5.75	£5.17
Total				£28.89	£26.00

Comparison	Sales Floorspace Convenience (sqm)	Sales Floorspace Comparison (sqm)	Sales Density (£ per sqm)	Total Turnover (£m)	Turnover from Catchment (£m)
Unit A	0	263	£4,500	£1.18	£1.07
Unit B	0	488	£4,500	£2.20	£1.98
Unit C	0	488	£4,500	£2.20	£1.98
Unit D	0	488	£4,500	£2.20	£1.98
Unit E	0	892	£4,500	£4.01	£3.61
Unit F	0	44	£4,500	£0.20	£0.18
Unit G (Part)	0	1644	£4,500	£7.40	£6.66
Total				£19.38	£17.44

TOTAL				£48.27	£43.44
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If the average convenience goods turnover rates from NPD2 (above) are applied to the proposed retail development, along with alternative, but reasonable, comparison goods turnover rates, it is evident that the proposals could have a total turnover of approximately £48.3m, with £28.9m of convenience goods turnover and £19.4m of comparison goods turnover.

Our view is that the analysis presented at NPD3 represents a more robust view on the turnover of the proposed retail park development and we believe that the applicants have underestimated the turnover of the proposals, something which translates into an underestimate of the impact they will have on nearby town centres.

In terms of retail impact, we consider that Tables 10a and 10b of the applicant's study significantly underestimate the impacts which would be felt by Arbroath and Carnoustie town centres. The study also fails to consider the overall impact of the proposals on these town centres and instead provides a disaggregated impact analysis for the proposed convenience and comparison floorspace.

In determining the impact of the proposals, it must be acknowledged that what is being proposed is a new retail park, providing a range of convenience and comparison outlets on a site which lies immediately adjacent to an existing large Asda superstore. When taken together, the proposed retail park and the existing adjacent Asda superstore would become the focus for convenience and comparison retailing in Arbroath. Here shoppers would have access to a range of convenience and comparison outlets, all serviced by surface level car parking, providing a highly convenient arrangement for the car borne shopper.

This arrangement would undoubtedly lead to very significant levels of trade diversion from existing town centres, especially Arbroath and Carnoustie, and certainly at levels beyond those indicated in the applicant's retail study.

By way of example, Arbroath town centre has a company average convenience goods turnover in the order of £11m. If the proposed retail floorspace drew only 10% of its convenience goods turnover (£2.98m) from Arbroath town centre, which lies only 1.2 miles from the application site, this would equate to a trading impact of 27%. An impact on this scale would have very serious consequences for the centre, most likely bringing about store closures.

It must be acknowledged that Arbroath town centre is particularly sensitive to retail impact, something demonstrated by the Council's own town centre health check, published in June 2017. This indicates that footfall in Arbroath town centre fell by around 58% between 2010 and 2017. The Council attributed this significant decline to a number of reasons, including the closure of a number of important civic services, impacts from out of centre retail development and an increase in online retail sales. The Council's 2017 study also reported that Arbroath town centre had also suffered from an increase in vacant retail units, a decrease in the number of multiple retailers, increased charity shop representation and a dominance of retail services uses.

The Council's findings in Carnoustie town centre were not dissimilar, with footfall found to have decreased by approximately 25% and with the town centre having a vacancy rate around 10%. The only multiple retailer in Carnoustie town centre is our client's store on the High Street, again reflecting the susceptibility of the centre to retail impact.

The Council's own survey data illustrates the fragile nature of the aforementioned town centres. The proposed development will only serve to draw more trade away from these town centres, something which will undoubtedly lead to further reductions in footfall and increases in vacant floorspace.

Taking these matters into account we are of the firm view that the proposed out of centre retail park would significantly undermine the vitality and viability of Arbroath and Carnoustie town centres and the proposals must be considered as being contrary to Policies TC17 and TC19 of the adopted LDP.

Summary and Conclusions

The submitted application seeks permission to develop a 9,217 sqm retail park on an out of centre site at Elliot Business Park which has the potential to significantly impact on the vitality and viability of Arbroath and Carnoustie town centres,

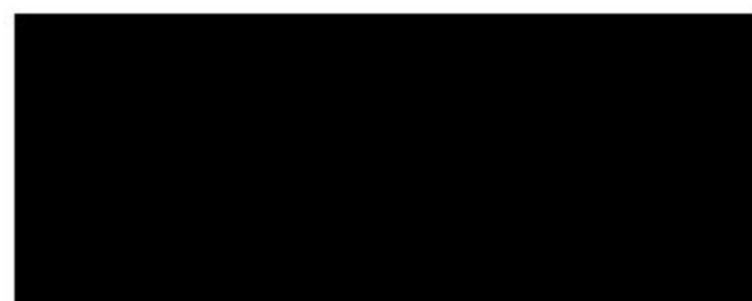
The development plan seeks to protect the aforementioned town centres and the proposed will seriously undermine the aims and objectives of the local development plan, contrary to LDP policies TC17 and TC19.

The SDP and LDP establish a clear policy framework which supports the Council's town centres. The Co-operative Group and other town centre retailers in Angus have invested in the Council's town centres based on this support and this investment should not be undermined.

In addition, the proposals will bring about the loss of a prominent and high-profile employment site which the LDP seeks to protect for Class 4, 5 and 6 uses. The proposed retail park development is therefore contrary to LDP policies DS1 and TC14 and there is simply no justification for the Council to depart from its very clear policies which direct that the submitted application should be refused.

We trust that our client's objections to the submitted application will be given due consideration by the Council and we would be grateful for written confirmation of receipt of this letter. It would also be appreciated if we could be kept informed as to how matters progress.

Yours sincerely



Graeme Laing MRTPI
Director
NORTH PLANNING & DEVELOPMENT

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Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Steven Cargill

Address: Steven 5a Braeheid ,St Vigeans Arbroath

Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I have had an opportunity to look at the proposed plan for entrance and exit to this proposed development and I would make the following comments:

The proposed access to this development is too close to the roundabout at the golf course. There have been roadworks recently at the roundabout at McDonalds which involved traffic lights and this led to queues backing up to the top of the hill beside the golf course. The proposed access to this development will cause the same issue because there is not enough space for traffic to queue. It would be better if the access was half way along the proposed development to prevent this.

This would also prevent large lorries disturbing the residents of the caravan park when they deliver.

The access to this proposed development is of the utmost importance and I would ask that my comments are given due weight when a decision is made.

Ref: H06/19kwh01let

19/03/2019

Planning and Development
County Buildings
Market Street
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DD8 3LG

FAO Mr R Kelly

By Email: planning@angus.gov.uk

Hargest Planning Ltd

PO Box 28822
Edinburgh
EH14 9AX

Tel: 0131 226 1272

www.hargestplanning.co.uk

Dear Sir,

OBJECTION TO PLANNING APPLICATION 18/00975/FULM - PROPOSED RETAIL DEVELOPMENT ETC - ELIOT INDUSTRIAL ESTATE, ARBROATH - BRACKENBRAE INVESTMENTS LIMITED

I am writing on behalf of Lidl UK GmbH to object to the above planning application recently submitted for a new retail development on land at the Eliot Industrial Estate adjacent to the Westway Retail Park in Arbroath. Lidl UK GmbH currently operate a discount foodstore located within the town centre of Arbroath and have undertaken significant investment supporting the vitality and viability of the town centre. The proposed development by Brackenbrae Investments Ltd would be for additional out of centre competing retail development which would have significant adverse impacts on the vitality and viability of the town centre and other protected retail locations, it would result in the loss of existing employment land and, as such, would be contrary to the provisions of the adopted Angus Local Development Plan, TAYPlan and Scottish Planning Policy.

Summary of Objection

Lidl objects to the above planning application on the following grounds:

- The proposal will result in the loss of existing employment land without any replacement.
- The proposal is for an out-of-centre retail development which fails to address any retail deficiency within Arbroath.
- The retail impact assessment submitted with the planning application significantly underestimates potential adverse impacts on stores in Arbroath and other towns adversely affecting the vitality and viability of these centres.

Each of these matters will be addressed below.

Loss of Employment Land

The development is proposed on land at Eliot Industrial Estate which is identified in the adopted Angus LDP as an existing employment site and which is the subject of Policy TC14 of the LDP.

Policy TC14 encourages development of Classes 4, 5 and 6 on existing employment sites. The current application is for a combination of Class 1, Class 3 and sui generis uses. The policy identifies that proposals for non-employment uses (i.e. other than Classes 4, 5 and 6) criteria must be satisfied, as follows:

1. The proposal is complementary or ancillary to an existing or proposed employment use. There is no suggestion that the proposal is ancillary to any existing or proposed employment use. This criterion is not satisfied.

If criterion 1 is not satisfied then all of the following must be satisfied:

2. *The loss of the site would not undermine the provision of employment land in Angus, or land which may be important to retain due to its individual characteristics, regardless of the amount of employment land available.* The application site is in a key gateway location as one enters Arbroath. It is therefore able to make an important contribution to employment land with the town regardless of the availability of other employment land within the town.

3. *The proposal would not undermine the operation of existing or proposed employment uses on the whole allocation or existing employment area.* The location of the site is unlikely to affect other employment uses within the Eliot IE.

4. *There is no unacceptable impact on the built and natural environment, surrounding amenity, access and infrastructure.* At the time of this representation information on the Transport Statement submitted with the application is not accessible from Angus Council planning portal. Lidl therefore reserve the right to submit additional comments relating to impact on transport infrastructure when this information can be accessed.

5. *If relevant, the proposal is in accordance with Policy TC19 Retail and Town Centre Uses.* As will be demonstrated below the proposal fails to satisfy Policy TC19.

It is clear, therefore, that the proposal does not satisfy criterion 1, nor does it satisfy all of criteria 2-5. It follows that the proposed development is not in accordance with Policy TC14.

Retail Impact Assessment

Policy TC17 defines the network of centres comprising large town centres (including Arbroath), smaller town centres (including Carnoustie) and commercial centres (including the Westway Retail Park). The location and extent of these centres is identified in the LDP inset maps. Although located adjacent to the Westway RP the application site is clearly outwith both the defined town centres and commercial centres, it is therefore, an out-of-centre location.

Policy TC19 sets out the policy to be applied for retail development, including retail proposals in excess of 1000 sq m GFA located on the edge of or outside defined town centres. The policy states that, for a development of the proposed scale in an out-of-centre location, assessments should demonstrate that each of the following are satisfied:

- A sequential approach to site selection has been followed and that out-of-centre sites are, or can be made, accessible.
- The proposal does not undermine the vibrancy, vitality or viability of any of the defined town centres.
- The proposal tackles a deficiency in provision (either qualitative or quantitative).
- The proposal is compatible with surrounding land uses, amenity, access and infrastructure.

The information relevant to the assessment of the proposal is set out in the Retail Statement (RS) prepared by GVA (November 2018).

Retail Impact and Deficiency

The submitted significantly underestimates potential adverse retail impacts and overstates the extent to which the proposal is able to address retail deficiencies. It does this at a number of stages in the assessment process. The following sets out a *brief summary* of the key areas in which the RS misrepresents the true impact of the proposal.

1. Proposed Floorspace

The proposed development is identified to have 9778 sq m GFA (9227 sq m GFA Class 1) and 6725 sq m NFA retail comprising a range of types of retail units. Although the same as the application form, these figures differ from those identified in the drawing of the proposed layout which shows either 9276 sq m GIA or 9528 sq m GEA. The application is therefore unclear as to what exactly is being proposed. Given that the site is limited in size for accommodating this scale of development (for example the parking provision of 334 spaces is more than 20% less than the maximum permitted) *one has to*

question whether the applicants are trying to include additional floorspace without demonstrating how it can be accommodated on the site.

The table following para 2.3 of the RS identifies the net and gross floor area of the retail units. For most units the net to gross ratio of 75% which is reasonable for modern retail park type units. However, Unit 6 is identified to have a net to gross ratio for internal space (i.e. excluding the external sales area (assumed to be a garden centre) of only 60%. This is unusually low for this type of unit and indicates that, in all likelihood, the RS underestimates the net sales area of this unit – by approximately 425 sq m. *This means that the RIA is, at the outset, underestimating total turnover and retail impacts.*

2. Catchment Area

The RS identifies both a primary and secondary catchment area for the proposed development. The SCA is wholly unreasonable and it is impossible to envisage any of the units proposed drawing any significant amounts of trade from the identified SCA. The SCA extends as far as Monifieth, east Dundee, Forfar and Montrose.

It is noted that no operators are named for the proposed stores, however, examining the layout does provide very strong indicators of the types of operator anticipated to occupy the units:

Unit A. This is a discount food operator. Given that Lidl are *not* the proposed operator this only leaves Aldi. Aldi already have stores in each of Forfar, Montrose and Arbroath Road, Dundee. It is therefore not credible to suggest that anyone (apart from the *very* occasional visit linked with a trip to Arbroath for another purpose) would travel from Dundee, Forfar or Montrose to the application site for shopping in this store.

Unit G. The size of the unit and external sales area indicates that this would be for a non-food discounter such as B&M or Home Bargains. B&M have existing stores in Forfar and Kingsway East and Home Bargains have stores in Arbroath town centre, Montrose, Forfar and Kingsway East. Again, it is not credible for shoppers to travel from the SCA to this store when there are much nearer existing stores.

Unit F. This is a foodstore. The only potential operators for a store of this size are M&S, Iceland or Metro format stores operated by Tesco. M&S has various food stores in Dundee although it is possible that those travelling from Montrose (only) could find Arbroath more convenient – Forfar residents would find the existing Dundee stores easier to access. For Iceland and the Tesco Metro formats catchments are normally very restricted and these would not draw from much beyond Arbroath or Carnoustie.

All the other units are significantly smaller and it would be very unlikely that they would draw trade from beyond the PCA.

Overstating the catchment area for the proposed development has two key effects in the RS. *First it dilutes the trade diversion from Arbroath and Carnoustie shops thereby substantially underestimating potential adverse impacts. Second, it overstates the extent to which there could be quantitative retail deficiencies within the catchment area.* Both of these are examined below.

3. Reliance on Household Survey Information

The use of a household survey for the RS is helpful. However, GVA have failed to understand the limits of the statistical reliability of the information generated from the survey and not tested the results of the survey against other key information. In this way the tables following paras 4.29 (for convenience) and 4.37 (for comparison) produce inconsistent results that are not supported by other evidence – including both the vacancy rate within the town and accurate estimates of existing retail floorspace. For example, the RS suggests that convenience goods shops in Arbroath town centre are trading 21% *above* average turnover (i.e. they are very strong), Morrisons is overtrading by 33% but Tesco is pretty much at average and Asda *undertrading* by 40%. Lidl is identified to be overtrading by about 70%! The variability in these estimates and suggested strength of the town centre shops is at odds with the vacancies identified in the town centre in the health check.

If town centre convenience shops are overtrading by over 20% one would expect to see clear signs of strong demand – empty shelves, long queues at check outs, etc. Also, one would expect other convenience retailers being very keen to gain space in what would be seen as a very attractive retail location. There is, of course, no indication of this overtrading at all – instead we see vacancies at about the national average. This would suggest that, rather than shops over-trading, we simply have a problem associated with small sample sizes. This is not a criticism of using the survey nor of the survey design – it is just the inevitable result of sampling and the need to balance survey sample data with other evidence before one can draw conclusions about the trading conditions in Arbroath town centre. GVA have failed to do this and, as a result, substantially overestimate the strength of convenience shopping in the town centre (and, conversely, underestimate the turnover in Asda).

The significance of this is that the RS overestimates the strength of town centre shops and thereby underestimates the significance of impacts. Table 10a shows this. Here GVA suggest that, when one takes into account the “over-trading” of existing Arbroath town centre convenience shops, the turnover of these shops after the impact the proposal, is that they are still trading, on average, 9% *above* average and it suggests that Lidl is trading 54% above average. However, when one considers all the evidence, i.e. town centre shops are currently trading at about average levels the result of the impacts identified in Table 10a are that, following impact, town centre shops would be trading 10% *below* average.

4. Existing Retail Floorspace and Turnover of Centres

Another clear difficulty for the assessment and estimate of overtrading is that the RS does not identify accurately existing convenience floorspace – instead it substantially underestimates convenience floorspace. This error reinforces the RS overestimating actual turnover and significantly overestimates quantitative deficiencies.

This can be seen by considering the four largest foodstores in Arbroath and comparing the areas identified in planning consents for the stores and the net floor area identified in Table 8a:

- Lidl, Gravesend. Lidl's net floor area is 1286 sq m of which 1093 sq m is for convenience goods however the RS identifies only 743 sq m NFA convenience.
- Asda, Westway. The store is permitted 1500 sq m NFA convenience goods but the RS identifies only 1115 sq m NFA.
- Tesco. The consented store has 1715 sq m NFA convenience but the RS identifies only 1227 sq m NFA.
- Morrisons. Here the difference is small – the actual convenience is 1893 sq m NFA but the RS identifies 1868 sq m NFA.

Therefore, when one considers these four stores alone, the RS underestimates actual convenience net floorspace by 1248 sq m i.e. 20% less than the actual floorspace. This factor alone accounts for the overestimate of actual sales densities used in the RS. If Table 8a adopted the correct actual sales areas the sales densities would decrease by the same amount – therefore the town centre convenience sales would reduce from 121% of average to 101% i.e. almost exactly average sales densities. This is, of course, consistent with the vacancies in the town centre and other observations.

This reinforces the point made above, that convenience shops are *not* overtrading, instead they are trading at about average levels *which means the impacts identified will result in existing shops trading significantly below average levels. These impacts will, therefore, adversely affect the viability and vitality of the town centres.*

5. Proposed Development Turnover

In general, the sales densities adopted in Table underestimate potential turnover although as a result of not identifying actual proposed operators introduces some uncertainties. For example, Unit F sales density at £6513 psm is low for operators such as Iceland, M&S or Tesco Metro which would indicate total convenience sales closer to £22m would be more reasonable. For the comparison units there is considerable variability for operators – for example electrical and clothing retailers would have much higher sales densities than suggested but some furniture retailers would be lower. For the mixed unit an operator such as Home Bargains would have a sales density double that identified for Unit G.

In general Table 9 underestimates convenience turnover by about 20% and comparison turnover by 10-20%. *This would result in the RS underestimating adverse impacts.*

6. Trade Diversion Assumptions

The Trade diversion assumptions in Tables 10a and 10b are wholly unreasonable. Given that the proposed development will not draw trade from the suggested SCA all trade to the development needs to be diverted from shops within the PCA except where there is currently significant leakage from the PCA to other towns (notably Dundee) in which case there would be some clawback of leakage. The latter is only anticipated to arise for comparison goods.

Table 10a identifies that only 55.5% of convenience trade would be diverted from shops within the PCA. In reality the trade diversion from this area for convenience goods would be in excess of 90%. This means that the table underestimates trade diversion from the existing town centres and Westway, *and thereby severely underestimates adverse impacts on these centres.*

Table 10b identifies that only 23% of trade would be diverted from PCA shops (i.e. 77% would be clawback of leakage). It is reasonable to assume that a significant proportion of trade diversion would be from Dundee shops but this is unlikely to exceed 50% of the turnover of the development. *It follows that the RS also underestimates adverse impacts on comparison goods shops within the PCA in the same that it does for convenience goods.*

7. Significance of Impacts

Drawing the above factors together it is clear that the RS substantially underestimates the impacts that would occur on existing shops, town centres and the Westway Retail Park. Combining the points identified in the review above impacts are likely to be closer to 30% on Arbroath town centre and lower for Carnoustie. The development will result in high impacts on Westway but these will be mitigated, to a degree by secondary spending from shoppers drawn to the development being able to visit the existing shops at Westway as part of the same trip.

In terms of impacts on Arbroath town centre these will be on a centre that is trading at about average levels for convenience goods but below average for comparison goods. This will mean that in terms of significance of impact the proposal will significantly undermine the vitality and viability of the town centre.

8. Assessment of Retail Deficiencies

The combination of overstating the extent of the catchment area for the proposed development together with underestimating the extent of existing convenience floorspace means that the quantitative deficiency for the development for convenience goods is substantially overstated.

There is also no qualitative deficiency for convenience proposals. Arbroath already has three major superstores, one discount foodstore, a specialist freezer store and a range of additional small convenience shops. All key convenience retail sectors are well represented in the town.

The above review demonstrates that the application fails to satisfy Policy TC19 in that the proposal will, contrary to the requirement of the policy, significantly adversely affect centres identified in the network of centres (in particular Arbroath town centre) and there is no justification to support the proposal in addressing a quantitative or qualitative retail deficiency (especially in terms of the convenience units proposed in the development).

It follows from the above that the proposal is contrary to the provisions of the development plan particularly in terms of Policies TC14 (employment land) and TC19 (town centre and retail uses) and there are no material considerations that would outweigh this conflict with the development plan.

In conclusion, Lidl UK GmbH, a retailer well established in Arbroath town centre and which has undertaken major investment in the town centre, objects strongly to the proposed development by Brackenbrae Investments Ltd. The proposal is clearly in conflict with the development plan and there are no material considerations that would outweigh this conflict. It is, therefore, respectfully submitted that the application should be refused planning permission.

If you require any additional information or require clarification of any of the points raised above please do not hesitate to contact me.

Yours faithfully

Keith Hargest
Director

14 June 2019

NORTH PLANNING & DEVELOPMENT

Angus Council
Planning and Development
County Buildings
Market Street
Forfar
DD8 3LG

2nd Floor
Tay House
300 Bath Street
Glasgow
G2 4JR

FAO: RUARI KELLY

Dear Sir / Madam,

PLANNING APPLICATION 18/00975/FULM: PROPOSED RETAIL DEVELOPMENT, COMPRISING FOOD AND NON-FOOD UNITS (CLASS 1), DRIVE THROUGH UNITS (CLASS 3 AND SUI GENERIS) AND ANCILLARY DEVELOPMENT INCLUDING ACCESS, DRAINAGE, LANDSCAPING AND OTHER ASSOCIATED WORKS ON LAND AT FACTORY ELLIOT INDUSTRIAL ESTATE, ARBROATH, DD11 2PT.

OBJECTION SUBMITTED ON BEHALF OF THE CO-OPERATIVE GROUP

I refer to our discussions regarding the above and the report commissioned by Angus Council which considers the retail impact of the proposed development on the Council's defined network of centres.

We have taken the opportunity to review the report prepared by Scott Hobbs Planning and we acknowledge and endorse their conclusions that the applicant's submissions underestimate the impact of the proposed development and their view that the proposals would have '*significant, structural, long term consequences for the future of the town centre as a retail destination*'.

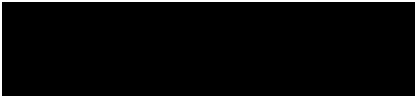
We note that the Council's independent report concurs with many matters raised in our client's objection of 14th February 2019, particularly in respect of the applicant's retail statement and its approach to defining an appropriate catchment, its trade draw assumptions and its use of company average turnover rates.

The Council's report reaffirms our view that the application proposals would have a significant adverse impact on the vitality and viability of Arbroath and Carnoustie town centres, undermining the aims and objectives of the local development plan and running contrary to LDP policies TC17 and TC19.



We thank you for the opportunity to comment on the Council's report and we trust that our client's objections to the submitted application will be given due consideration by the Council in determining the application.

Yours sincerely



Graeme Laing MRTPI
Director
NORTH PLANNING & DEVELOPMENT

graeme@northplan.co.uk
T. 0141 212 2626

Asda/Arbroath

20 June 2019



Ruari Kelly
Angus Council

Sent via email: planning@angus.gov.uk and kellyr@angus.gov.uk

Dear Mr Kelly

**Planning Application 18/00975/FULM
Proposed Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works**

Further to your email of 7th June, we write on behalf of Asda Stores Limited to respond to the Council's Retail Consultant's review of the applicant's supporting retail information along with the letters of representation to the application.

Asda are pleased to see that the consultants are generally in agreement with the points raised in the objection letter dated 18th January 2019.

The review confirms that there are significant concerns that the impact on the vitality and viability of Arbroath Town Centre has been understated in the Retail Statement and that the impact is actually likely to be significantly higher. Asda agrees with this position.

The outcome of this potential impact is clearly set out in the review at paragraph 4.4 such that *"a significant increase in the predicted level of impact, coupled with the highly flexible format and floorspace ranges which could be facilitated in the proposed development, could have significant, structural, long term consequences for the future of the town centre as retail destination."*

As such Asda maintains its position that the Council should refuse this application; the impact that this proposal will have on the Town Centre is significant in relative terms given the total quantum of retail and the potential for Town Centre tenants to relocate. In addition, Asda also maintains their objection position in relation to the proposal being contrary to the site allocation in the LDP.

I look forward to receiving confirmation of receipt of this further objection.

Yours sincerely

A solid black rectangular box used to redact the signature of Katherine Sneed.

Katherine Sneed MRTPi
Director

RECEIVED

22 JUL 2019

PLANNING & PLACE
COUNTY BUILDINGS



PEACOCK+
SMITH

Ref: 01/5220(17Jul2019)Angus

FAO Ruari Kelly
Planning and Development
Angus Council
County Buildings
Market Street
Forfar
Angus
DD8 3LG

RECEIVED

22 JUL 2019

PLANNING & PLACE
COUNTY BUILDINGS

17th July 2019

Dear Mr Kelly,

**PROPOSED OUT OF CENTRE RETAIL DEVELOPMENT, ELLIOT INDUSTRIAL ESTATE,
ARBROATH, DD11 2PT
PLANNING APPLICATION REF. 18/00975/FULM**

We are instructed by our client, Wm Morrison Supermarkets plc (Morrison's), to **object** to the above-mentioned planning application on the grounds of conflict with development plan and national policy.

Morrison's operates an edge-of-centre foodstore in Arbroath. The Morrison's store helps to anchor the town centre, generating 'linked trips' to the other shops and services of the town centre.

Our comments are based on a review of the adopted development plan and the information contained in the supporting documentation for the application, which includes the Retail Statement, prepared by Avison Young (GVA) and their subsequent response to the report by Scott Hobbs, dated June 2019.

The Proposal

The application seeks planning permission for eight new retail units (to include Aldi and Iceland) and two drive thru premises with extensive free parking at a location that is far removed from the main residential areas of the town and more than 2.5 km from the town centre. The proposed development would have a total floor area of 9,217 sq. m gross, which is very significant for a town the size of Arbroath.

Local Plan Policy

Policy TC19 (Retail and Town Centre Uses) states that:

"Proposals for retail and other town centre uses over 1,000 sq. m gross floorspace (including extensions) on the edge of or outside of defined town centres (including in out of town locations) will be required to submit relevant assessments (including retail/town centre impact and transport assessments) and demonstrate that the proposal:

- has followed a sequential approach to site selection, giving priority to sites within the defined town centre before edge of centre, commercial centre or out of centre sites which are, or can be made accessible;*
- does not individually or cumulatively undermine the vibrancy, vitality and viability of any of the town centres identified in Table 2 in Angus;*
- tackles deficiencies in existing provision, in qualitative or quantitative terms; and*

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• is compatible with surrounding land uses and there is no unacceptable impact on the built and natural environment, surrounding amenity, access and infrastructure.

Proposals for retail and other town centre uses under 1,000 sq. m gross floorspace (including extensions) on the edge of or outside of defined town centres may be required to submit relevant assessments (including retail / town centre impact, transport and sequential assessments) where it is considered that the proposal may have a significant impact on the vibrancy, vitality and viability of any of the town centres in Angus."

This policy approach is supported at national level in the National Planning Framework and Scottish Planning Policy.

The applicant has submitted a retail statement, which considers the various tests required by Local Plan policy TC19. However, we disagree with a number of the assumptions made by Avison Young in its impact assessment and we consider for the following reasons that the proposal is contrary to the Local Plan and should be refused planning permission.

Retail Impact Issues

Table 8c of the June 2019 Avison Young response shows that the catchment area has an 'outflow' of convenience expenditure of just 15%, which is very low and indicates that there is no existing deficiency in the area's convenience retail provision. Arbroath has the following foodstores: Asda, Lidl, Morrisons, Tesco and a number of Co-op stores and independent traders. Table 8c also shows that very few of the area's foodstores are 'overtrading', which is a further indicator that there is no deficiency in the area's convenience retail provision. Indeed, the convenience retail sector in both Arbroath and Carnoustie town centres is estimated by Avison Young to be underperforming as it is only achieving around 80% of its expected turnover.

To introduce a large new out-of-centre retail development into a catchment area that has minimal outflow and underperforming town centres will merely serve to further undermine the town centres. We note that Avison Young estimate in Table 10a that 42% of the new development's convenience turnover will be diverted from stores outside the catchment area, which we consider to be significant overestimate and we would expect most of the new development's turnover to be drawn from existing stores in Arbroath and Carnoustie.

We have therefore reworked Table 10a (see attachment) using more realistic trade draw assumptions, as shown below. We estimate the impact on the convenience goods turnover of Arbroath and Carnoustie town centres to be around 16%, which will further undermine their performance, by reducing footfall, spend and their vitality and viability as town centres.

In terms of comparison expenditure, we accept that there is some potential to reduce outflow of local expenditure, but consider that Avison Young have significantly underestimated the impact of the proposal on the town centres of Arbroath and Carnoustie. We have therefore reworked Table 10b to show more realistic trade diversion figures, based on actual comparison market shares. This shows that the proposal will reduce the comparison goods turnover of Arbroath and Carnoustie town centres by 11%-12%.

We therefore estimate that the combined impact of the proposal on the two town centres to be 12% to 15%, reducing the turnover of each centre to just 71% to 74% of its expected turnover. These levels of impact are significantly adverse. In practice, we would expect the impact to be even greater as there would be fewer linked trips between Arbroath town centre and the edge-of-centre Morrisons store.

	Convenience Turnover (£m)	Comparison Turnover (£m)	Total Turnover (£m)	Trade Diversion (£m)	Post Impact Turnover (£m)	Impact	Company Average (£m)	% of Average Turnover
Arbroath Town Centre	13.4	42.22	55.62	6.67	48.75	12%	69.11	71%
Carnoustie Town Centre	7.87	6.1	13.97	2.05	11.92	15%	16.12	74%

Summary and Conclusions

Based on the information submitted, the application should be refused as it is contrary to Local Plan Policy TC19 as the proposal would undermine the vibrancy, vitality and viability of Arbroath and Carnoustie Town Centres and there are no local deficiencies in the area's existing foodstore provision.

Should you require any further information or clarification, please do not hesitate to contact Chris Creighton on the number listed above.

Yours sincerely



PEACOCK AND SMITH

Encs.

Revised Table 10a: Trade Diversions - Convenience

	Company Average Turnover (£m)	Actual Turnover [SURVEY BASED] (£m)	Diversion (%)	Diversion (£m)	Post Proposal's Turnover (£m)	Impact (%)	% of Average Turnover
Primary Catchment Area							
Carnoustie Town Centre	9.81	7.87	8%	1.31	6.56	16.7%	67%
Co-op, High Street, Carnoustie	7.7	7.22	8%	1.31	5.91	18.2%	77%
Local Shops, Carnoustie	0.2	0.25	0%	0.00	0.25	0.0%	125%
Spar, High Street, Carnoustie	1.91	0.39	0%	0.00	0.39	0.0%	20%
Carnoustie Out of Centre							
Co-op, Barry Road, Carnoustie	2.1	2.61	3%	0.49	2.12	18.9%	101%
Spar, Barry Road, Carnoustie	71	0.32	0%	0.00	0.32	0.0%	0%
Arbroath Town Centre	14.39	13.4	13%	2.13	11.27	15.9%	78%
Farmfoods, High Street	1.37	0.55	1%	0.16	0.39	29.8%	28%
Harbour Store, High Street	0.09	0.06	0%	0.00	0.06	0.0%	67%
Home Baragins	2.44	0.4	0%	0.00	0.40	0.0%	16%
Lidl	10.48	12.38	12%	1.97	10.41	15.9%	99%
Arbroath Out of Centre							
Family Shopper, Montrose Road	0.42	0.12	0%	0.00	0.12	0.0%	29%
Morrisons, Hume Street	22.44	29.76	29%	4.76	25.00	16.0%	111%
Shop and Save, Brechin Road	0.18	0.08	0%	0.00	0.08	0.0%	44%
Asda, Westway Retail Park	19.5	8.6	8%	1.31	7.29	15.3%	37%
Co-op, Arbirlot Road	3.8	1.2	1%	0.16	1.04	13.7%	27%
Local Shops, DD11/2	0.2	0	0%	0.00	0.00	0.0%	0%
Key Store, Cairine Street	0.38	0.1	0%	0.00	0.10	0.0%	26%
Shell Service Station, Cairine Str	0.18	0.03	0%	0.00	0.03	0.0%	17%
Tesco, Cairine Street	22.47	16.38	16%	2.63	13.75	16.0%	61%
The Paper Shop, Keptie Street	0.18	0.05	0%	0.00	0.05	0.0%	28%
Local Shops, DD11/3	0.09	0.49	1%	0.16	0.33	33.5%	362%
Costcutter, Montrose Road	0.9	0.19	0%	0.00	0.19	0.0%	21%
Local Shops, DD11/4	0.09	0.4	0%	0.00	0.40	0.0%	444%
McColls, Millfield Road	0.36	0.36	0%	0.00	0.36	0.0%	100%
Local Shops, DD11/5	0.09	0	0%	0.00	0.00	0.0%	0%
Co-op, Mayfield	2.07	2.02	2%	0.33	1.69	16.2%	82%
Secondary Catchment Area							
Monifieth Town Centre	12.72	15.22	0%	0.00	15.22	0.0%	120%
Farmfoods	1.92	0.19	0%	0.00	0.19	0.0%	10%
Tesco	10.8	15.03	0%	0.00	15.03	0.0%	139%
Out of Centre							
Asda, Forfar	20.52	7.37	1%	0.16	7.21	2.2%	35%
Co-op, Brechin	6.67	1.89	0%	0.00	1.89	0.0%	28%
Co-op, Monifieth	1.75	1.34	0%	0.00	1.34	0.0%	77%
Co-op, Montrose	1.4	0.42	0%	0.00	0.42	0.0%	30%
Farmfoods, Montrose	3.27	0.44	0%	0.00	0.44	0.0%	13%
Lidl, Montrose	7.13	4.37	0%	0.00	4.37	0.0%	61%
Spar, Monifieth	0.51	0.13	0%	0.00	0.13	0.0%	25%
Other	0.36	0.69	0%	0.00	0.69	0.0%	192%
Outside Catchment Area (incl. SFT)			15%	2.46			
Diversion		14.34		0.00	14.34	0.0%	
Total Turnover				16.41			

Revised Table 10b: Trade Diversions - Comparison

	Company Average Turnover (£m)	Actual Turnover [SURVEY BASED] (£m)	Diversion (%)	Diversion (£m)	Post Proposal's Turnover (£m)	Impact (%)	% of Average Turnover
Primary Catchment Area							
Arbroath Town Centre	54.72	42.22	32%	4.736	37.484	11.2%	69%
Carnoustie Town Centre	6.31	6.1	5%	0.74	5.36	12.1%	85%
Out of Centre							
Asda, Arbroath	4.7	1.31	1%	0.148	1.162	11.3%	25%
Westway Retail Park, Arbroath	9.75	7.31	5%	0.74	6.57	10.1%	67%
Morrisons, Arbroath	4.44	0.71	1%	0.148	0.562	20.8%	13%
Tesco, Arbroath	5.39	0.9	1%	0.148	0.752	16.4%	14%
Screwfix, Arbroath	0.83	0.15	0%	0	0.15	0.0%	18%
Auchmithie Village	0.21	0.18	0%	0	0.18	0.0%	86%
Leysmill Village	0.21	0.17	0%	0	0.17	0.0%	81%
Marywell Village	0.21	0	0%	0	0	0.0%	0%
Ashbrook Nursery, Arbroath	0.24	0.12	0%	0	0.12	0.0%	50%
Secondary Catchment Area							
Brechin Town Centre	7.36	4.4	1%	0.148	4.252	3.4%	58%
Forfar Town Centre	59.29	11.78	1%	0.148	11.632	1.3%	20%
Out of Centre							
Fricokheim Village	0.21	0.27	0%	0	0.27	0.0%	129%
Letham Village	0.21	1.16	0%	0	1.16	0.0%	552%
Brechin Castle Garden Centre	0.47	0.4	0%	0	0.4	0.0%	85%
Silverwells Garden Centre	0.47	0.22	0%	0	0.22	0.0%	47%
Lidl, Montrose	1.13	0.03	0%	0	0.03	0.0%	3%
Outside Catchment Area (incl. SFT)		14.34	54%	7.992	6.348	55.7%	
Diversion							
Total Turnover				14.8			

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Bruce Robertson

Address: Cookston Farmhouse Brechin

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this development on the grounds it will have a detrimental effect on the town centre independent retailers of Arbroath and further afield.

There can be no doubt that edge of town shopping developments take the customers and ultimately the jobs away from the centre of the towns.

There is little sense in Angus Council having a town centre regeneration fund when proposed developments like this one actively encourage edge of town shopping.

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Kaleem Ahmed

Address: 163 High Street Arbroath

Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Hi i am Kaleem Ahmed

i own Nickel & Dime and Harrisons within Arbroath, these are the two largest retail shop spaces within the high street.

Nickel & Dime has been here for 25 years now, and has been supporting the public, providing a service with pride. It is my family business, and i keep thinking what will happen if the retail park is given the go ahead. B & M Bargains are a large multi national, we just can not compete with them at all. we need support from the public of Arbroath aswell as our local council and other stakeholders also.

especially now with the parking charges, the whole high street has been on a downturn, we need your support, and not a retail park

Furthermore if god forbid, we have to close the shop, who will fill the space? it will leave the high street worse off than what it is at the moment.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Margaret Robertson

Address: 30-40 St. David Street Brechin

Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to put in an objection regarding this proposal. The town centres of Angus are suffering enough through lack of footfall, and therefore the local businesses are finding trading conditions very difficult. To have yet another large store on the edge of any town in Angus, that actively encourages people to shop outside of their town centre, is ridiculous and short-sighted. Angus Council should be supportive of local independent businesses, not encouraging multi-nationals in to the detriment of the local economy. Lack of businesses in any town centre means more empty buildings, and this does not encourage any new investment in the centre of our towns.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr David Pert

Address: 104/108 High St Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Dear Planners,

Why does this development need to go ahead?

All the proposed shops are already "covered" in Arbroath. Do we actually need a new take away?

How many supermarkets does Arbroath need?

If these companies really want to come to Arbroath let them develop a site in the centre of a town, if this goes ahead it will be the death of the high st.

Access is also a problem, the road is a bottle neck without the added pressure of a retail park.

I believe there is now a shortage of industrial units in Arbroath, the site was previously a factory.

Keep it industrial, surely the promotion of employment is more important?

Yours

David Pert

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Helen anderson

Address: 14 Hospitalfield Road DD11 2LS Arbroath

Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:As a partner, with my daughter Mrs Lesley Firth, as owners of a 20 year old retail business we strongly object to an increase in out of town retail developments.

We, and many other businesses have had many meetings with local counsellors since last year and have all emphasised our desperate need for town renewal help. Our own business, At Home Accessories and Interiors, was started 20 years ago this month and we are now experiencing a drop of approximately 35% of our annual turnover. From discussions with other retailers we know we are not alone with this dire trend. We have sadly also had to reduce staffing hours.

Retail outlets do not require parking charges and they certainly do not encourage customers to come further into town for other shopping. In town we have the problem of paid parking with customers who actually tell us that they can only spend a few minutes as they have to watch their time for parking. This is not conducive to browsing and purchasing goods in our shop! We believe this has also seriously affected the footfall in the town centre.

It is our sincere belief, with a lot of retail experience behind this, that if further out of town retail is developed instead of a forward thinking planning strategy to regenerate what once was a beautiful town centre, then this will be the death knell for Arbroath.

KellyR

From: Georgina Stares <georgina.stares@tpsconsultants.co.uk>
Sent: 13 September 2019 08:01
To: KellyR; 'Judi Scholey'; katherine@jigsawplanning.co.uk; 'Alan Jones'
Subject: Re: Planning Application 18/00975/FULM - Retail Development, Factory Elliot Industrial Estate

Morning Rauri,

Apologies for the delay in response. We have now had the opportunity to review the revised internal layout in the context of our original objection, as well as the applicant's response and subsequent comments made by the Council.

As you'll be aware, both our objection and the Council's original response, and follow up comments suggested that the distance between the new signal controlled site access junction and the internal junction (priority T-junction providing access to the main car park and service yard) were too close together, which posed a road safety / potential highway capacity issue.

The revised arrangement shows an internal roundabout replacing the previously shown priority T-junction. The junction has also been relocated slightly further north, allowing marginally more room for stacking back into the site, for vehicles egressing at the signals.

Whilst we would agree that the revised proposals offer a betterment to the previous proposals, there have been no capacity assessments undertaken to illustrate the interaction between the site access signals and the internal roundabout. This is a cause for concern, given that the original modelling (i.e. that included within the TA) suggested a mean-max queue on the site access arm of 10pcus, spread over two lanes, in the PM 'with development' scenario.

Even with the junction relocated to the north, there is only sufficient capacity for c.3pcus to queue in each lane, and therefore we would anticipate that traffic would block back from the site access to (and through) the internal roundabout. Furthermore, a review of the anticipated turning movements for vehicles egressing the site, suggests there is a dominance of traffic turning left out (90% in both peak periods) and as such, the queue in the left hand lane on approach to the signals (i.e. egressing the site) is likely to block vehicles wanting to enter the right turning lane, reducing the capacity of the signalised junction, as compared with what has previously been modelled.

Moreover, without any assessment of the roundabout arrangement, there can be no assurance that vehicles entering the site will not block back to the signals (which would present a highway safety issue).

As such, we would respectfully request that the applicant provides operational assessments, which reflect the interaction of the site access with the internal roundabout, in order to satisfy our continued concerns regarding highway safety.

I trust the above is useful, if you have any queries, please don't hesitate to contact me.

Kind regards

Georgina

Comments for Planning Application 18/00975/FULM

Application Summary

Application Number: 18/00975/FULM

Address: Factory Elliot Industrial Estate Arbroath DD11 2PT

Proposal: Proposed Retail Development, Comprising Food and Non-Food Units (Class 1), Drive Through Units (Class 3 and Sui Generis) and Ancillary Development including Access, Drainage, Landscaping and Other Associated Works

Case Officer: Ruari Kelly

Customer Details

Name: Mr John Carswell

Address: Carswell Properties Ltd. Arbroath

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

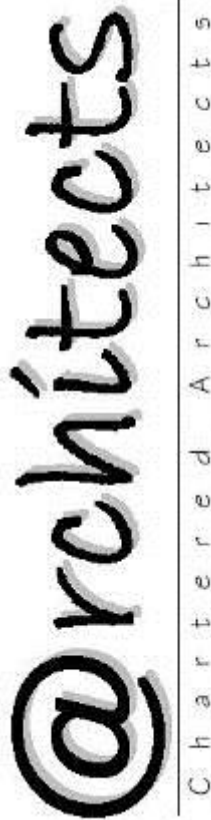
Comment: While we are not objecting to the above application as a company with interests both in the existing Westway retail park, Arbroath town centre and the Westport we do have our concerns over the impact the proposed development will have on the currently struggling town centre. In relation to the proposals we do however consider that in order to maintain a cohesion with the existing retail park and provide alternative routes of access and egress (reducing the cumulative road impact) it would be highly beneficial for the integration / linking of the proposed development with the existing retail park and we would hope that if the Councillors are minded to approve this application this should be incorporated into any approval as part of any relevant conditions.

From: Paul Fretwell

Sent: 07 March 2019 19:10

To: KellyR

Subject: 18/00975/FULM | Retail Development, Factory Elliot Industrial Estate



07 March 2019

Dear Ruari

On Behalf of Carswell Properties Ltd. We have been asked to provide you with the below comments relating to the above application.

In order to support sustainable economic growth the ALDP provides for sites capable of meeting the changing needs of businesses throughout the plan period and beyond. All in accordance with TAYplan SDP and the ALDP Development Strategy. Policy TC14 directs Class 4 (Business), Class 5 (General Industry) and Class 6 (Storage and Distribution) uses to employment land allocations and existing employment areas where infrastructure, connectivity, accessibility to transport networks by walking, cycling and public transport, and workforce are most readily available. This safeguarding of employment land through allocation for these uses ensures that suitable locations for employment related developments are provided whilst also helping to protect local employment opportunities, meet emerging employment needs and provide sufficient flexibility to cope with any increase in demand.

Within the allocations in the ALDP there is limited provision for employment land within Arbroath and what allocations are identified are in need of preserving due to the following. The allocation at Kirkton Industrial Estate is now predominantly developed out with very little opportunity of further development. More significantly is that the last available site at Elliott

Industrial Estate has recently been purchased for development leaving no capacity for new development at Elliott. This leaves the only available site for employment land under policy TC14 within Arbroath being that which is currently proposed for retail development as part of this application. To allow this would be contrary and indeed defeat the objective / purpose of the ALDP and particularly policy TC14 removing any ability to allow for sustainable economic business growth within the town as there will be no allocated available new sites capable of meeting the changing needs / growth of relevant business within Arbroath.

Regards

for @rchitects Scotland Ltd.

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Case Officer: Ruari Kelly

Customer Details

Name: Lord S Mallard

Address: Cairnie Are

Comment Details

Commenter Type: Miscellaneous

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

Comment: Why not knock down part of the high street and put these popular retail shops in the high st so that everyone is a winner not just a few