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Paul Woodcock,

2<sup>nd</sup> May 2012

Head of Regeneration and Planning

Dear Mr Woodcock,

**RB2011/1768: Erection of Food Retail Superstore etc for TCN UK and Tesco Stores Ltd**

I would refer to the amended plans that have been submitted in respect of the above planning application.

The amended plans were discussed at the Society's Executive Committee meeting on the 1st May. It was noted with dismay that the comments made by the Society, in its letter dated December 2011, in respect of the scale of the development, the standardised design, the petrol filling station, and the adoption of 'shared streets' have been totally disregarded.

From the Society's viewpoint the additional details now provided have heightened rather than allayed the concerns with respect to the impact of this development.

**Impact on the Town Centre:**

Table 6.2 of D.P.P. Ltd's Retail Assessment predicts that there will be an uplift in turnover of £5.0m (convenience goods) and £19.0m (comparison goods) to achieve the likely benchmark turnover of the new store.

Frankly it beggars belief that the retail consultants have estimated that the new store will only divert £40,000 pa *'from the other, largely independent, convenience traders in the town centre'* (paragraph 6.53). It is also difficult to comprehend how the consultants have estimated that the Town Centre (excluding Tesco Forge Island) has a comparison turnover of £76.0m. On the basis of this questionable figure it is contended that a trade diversion of £4.7m (6%) from the Town Centre to the new Tesco Superstore will not have a significant impact, and on the contrary the development proposal will clawback trade that currently leaks further afield to the ultimate benefit of town centre traders.

In Table 14 the estimated turnover of Rotherham Town Centre (excluding Tesco) is stated at £83.0m in 2017. Put another way this is 80% greater than Tesco Forge Island itself, £8.0m more than Asda at Dalton, and nearly double the turnover of Morrisons at Catcliffe.

Frankly, the Society feel that the majority of Rotherham residents would view these figures with incredulity, and may also seriously question the contention that the majority of the £24.0m uplift in turnover anticipated by Tesco will be achieved by diverting trade from Morrisons at Cortonwood, Asda at Dalton, and from Parkgate Retail World.

### **The Design of the Development:**

Somewhere in the reams of paper produced by the consultants there is a reference to there being no local vernacular architectural style to the east of the town centre which could act as a reference point for the new store. In so doing the architects seek to conveniently sidestep the points made in the Society's last letter with respect to the observations of Yorkshire Forward and the Commission for Architecture and the Built Environment.

Frankly, with the possible exception of the Drummond Street elevation, the design would not be out of place on a modern industrial estate. In essence this is a factory shed raised up on stilts to allow undercroft car parking. Viewed from the south east (i.e. the top of Wharncliffe Hill) the building will appear to be a massive single storey shed. The views from the north east, and in particular the northwest travelling along Centenary Way, will be brutal and completely alien to Rotherham Town Centre.

### **The Lack of Landscaping:**

It is noted that every single tree within the former Civic Area site, many of which are nearly 40 years old, are to be cut down. This demonstrates a complete lack of environmental sensitivity and finesse by the developer and its consultants.

The vast expanse of tarmac and concrete proposed makes no concessions to the local environment. TCN UK and Tesco Stores Ltd have demonstrated an utter disregard for the principles of good place making in their attempt to develop almost every square metre of the site. The destruction of the present urban greenspace and the mature trees at the eastern end of the site would be totally unnecessary if the Local Planning Authority lived up to its responsibilities and restricted the scale of the development as the Society has previously suggested. The landscape plan which has been adopted for the site may look pretty on plan but is pure nonsense. It is quite apparent that the landscaped strip along the Centenary Way boundary is so narrow that none of the trees that are proposed to be planted will be allowed to reach maturity due to the problem of branches overhanging the highway. Drawing No 4971/ASP4 confirms that in 8-10 years the tree canopy would overhang the highway by in excess of one metre.

The Society utterly rejects the observation made in paragraph 7.14 of the D.P.P. report that the *'new areas of public realm ..... will represent a more than adequate replacement for the informal area of landscaping which will be lost as part of the development proposal'*.

### **The Road Network:**

There is some confusion with respect to the proposal for Drummond Street arising from the designs produced by Aspect Landscape Planning. The Landscape Masterplan implies that pedestrian traffic will be focussed upon three designated crossing points but then another plan suggests that the Drummond Street highway will be a shared surface at the same level as the footways. The 'Shared Surface Plan' indicates that to compensate for the consequential loss of the kerb demarcation something like 160 'Marshalls – Rhino Steel' bollards will be inserted into the street scene. This is totally at odds with the national trend to reduce street clutter.

The Society notes with extreme concern that the Consultant carrying out the road safety audit of the overall scheme has been unable to express unqualified support for the proposals. Furthermore, given that the efficient operation of the Transport Interchange is of vital importance to the future prosperity of the Town Centre the Society is similarly concerned that the South Yorkshire PTE appears to have grave reservations with respect to the alterations of the road layout. It is clear from the documents enclosed with the planning application that the SYPTE is being forced to compromise its position in a way that will lead to a restriction on circulation of buses between platforms, and longer queues of buses exiting the Interchange.

### **Effingham Square:**

The Society recognises of course that the Tesco project is a *fait accompli*, and that due to tactical errors during the evolution of the Rotherham Renaissance Plan the community benefits normally associated with major Tesco superstores will not be forthcoming. Politically the Council is now in a position where it is committed to selling the Civic Area site to Tesco at all costs.

One thing it still has under its control however, is the treatment of Effingham Square. The proposed redesign of the Square to '*allow good pedestrian permeability from the store entrance*' should be strongly resisted. It is totally unnecessary and a waste of natural resources to replace the existing paved areas. Furthermore, removing the existing landscaped area and replacing it with paving will result in the loss of an area of greenspace which can be ill afforded given the vast expanse of tarmac and concrete that is to be erected to the east. It should also be pointed out that within the existing landscaped area, and directly in line with the proposed new pedestrian link to the north, there is a major service installation / access to underground utility services.

The Society would suggest that if the Effingham Square proposals were intended as 'planning gain' the money would be much better spent upon creating a high quality landscaped area on the north side of Centenary Way on the site resulting from the removal of the overbridge. An area of landscaping containing Flowering Cherries and a 'Britain in Bloom' standard of planting might in some small way compensate for, and draw the eye away from, the bleak ugliness of the Tesco Superstore. On a similar theme, might it not be possible to negotiate a major visual upgrading of the central reservation of the Centenary Way as it passes the development site?

### **The Hastings Clock:**

Although the Yorkshire Water sewer plan contains a disclaimer regarding the plan being indicative only, it appears that the position identified for the relocation of the Hastings Clock is directly above the intersection of the Effingham Street sewer and the Frederick Street trunk sewer to Aldwarke. This would seem to be unwise given the likely weight of the Clock and the below ground foundations required to support it.

### **Impermeable Surfaces:**

The submitted reports indicate that in consequence of the removal of landscaped areas the impermeable area of development will increase to 2.38 ha i.e. in excess of 91% of the site. It is proposed that the final point of discharge from the surface water drainage will be to the adopted combined sewer system crossing the site despite the fact that Yorkshire Water Services has stated categorically that *'the local public sewer network does not have the capacity to accept any discharge of surface water from the proposal site'*. Not only is Requirement H3 of the Building Regulations 2000 of relevance but also the Environment Agency has indicated an expectation that the surface water run off will be reduced by a minimum of 30% compared to the outflow from the Civic Area site prior to redevelopment. The developers have laid claim to the new superstore being an eco-building but there is little evidence of this. The adoption of a rainwater harvesting system to reduce surface water run off would be a positive start.

In conclusion, whilst the Society regrettably accept the inevitability of the Civic Area site being developed for a superstore it remains opposed to the planned scale of the development, the poor quality of the building design, and the lack of landscaping proposed.

As part of the Renaissance Plan the Council went to great expense employing consultants to develop a Design Code for the Westgate River Corridor. At the time it was complemented by the Commission for Architecture and the Built Environment (CABE) for its focus on building design. In terms of making an architectural and environmental statement of the Borough's aspirations the Walker Place site is more important due to the far greater prominence of the site. In the Society's view the site is sufficiently important to merit the involvement of the Design Council in its role as successor body to CABE.

Yours sincerely,