



Ref: A070056/TH/th
Date: 17 May 2019

FAO: Caroline Townley
Head of Planning Services
Planning Services
Gloucester City Council
Herbert Warehouse
The Docks
Gloucester
GL1 2EQ

Dear Sir/Madam,

**PROPOSED EMPLOYMENT, DIY RETAIL WAREHOUSE, HOTEL, RESTAURANT/PUB,
AND DRIVE THRU RESTAURANT
FORMER INTERBREW SITE, EASTERN AVENUE, GLOUCESTER
APPLICATION REFERENCE: 18/01444/FUL**

We write jointly on behalf of our clients Peel Land & Property Investments Plc and Gloucester Quays LLP, to provide a response to comments relating to the sequential assessment of the Peel Centre within the Retail Response Report issued by JLL and dated April 2019.

Firstly, it should be noted that based on previous evidence we have submitted on behalf of our clients, the Council and their consultants Avison Young accept that The Peel Centre is a sequentially preferable out-of-centre site well connected to Gloucester City Centre with linked trips occurring between the retail park, the primary shopping area, and uses within the defined City Centre boundary.

We note with some concern that, contrary to paragraph 86 of the NPPF, JLL suggest that the sequential approach is not relevant in the case of a proposal for an out-of-centre DIY store. It is argued by JLL that locational requirements and a reliance on car parking mean that DIY stores tend to be located out of town. JLL contend that Eastern Avenue is a more appropriate location than the sequentially preferable Peel Centre because of "*connections for like-for-like trips to other bulky goods stores in the locality*". Notwithstanding the fact this is plainly wrong and is in no way supported by the NPPF or NPPG, given that the Peel Centre contains other bulky and non-bulky comparison goods retail warehouse operators, such "like for like trips" could also take place at the Peel Centre.

Regarding JLL's comments on the size of available units at the Peel Centre, we reiterate that the former Toys 'R' Us unit and the Phase 2 elements of the cinema/Next scheme are able to accommodate a similar level of floorspace as proposed within the application. It is important to point out that both the Council and their retail planning consultants, Avison Young, also agree on this matter.

JLL are correct to note that the approved Phase 2 units are subject to some floorspace, layout and goods restrictions, however, goods that are permitted include those that would be sold within a DIY store. Should there be any requirement to vary the type of goods sold or amend any layout or floor plans, this can be achieved relatively easily and within a reasonable time period.

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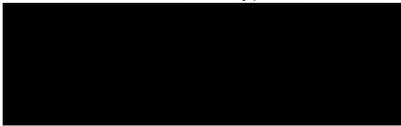


In addition, we note that JLL have suggested that Next was secured as an anchor tenant for the Peel Centre on an incentive-based package which is reliant on the cinema retail conversion works and further applications to remove the bulky goods retail restrictions on a number of units within the Peel Centre. Furthermore, any alternative proposals would be subject to agreement with Next. It is unclear where JLL have obtained this information from as it is factually incorrect. Our client's agreement is not reliant on any such agreements or approval process with Next.

Finally, given that the Peel Centre is a sequentially preferable out-of-centre site and an established comparison goods destination, it is nonsensical for JLL to suggest that future retail planning applications at the Peel Centre are likely to undergo more scrutiny than retail proposals on Eastern Avenue. As Eastern Avenue is clearly a less sequentially preferable location, an equal level of scrutiny, if not more, would be given to an application for more retail floorspace in this location.

We trust that you will consider the points we have raised carefully. If required, we would be happy to provide any further clarification on any matter relating to the Peel Centre.

Yours Faithfully,



Director