

# South Gloucestershire **Local Plan** **Policies, Sites and Places Plan**

## **Background Evidence:** **Town Centres and Retail Developments**

**May 2015**

## **Introduction**

1. This paper outlines how the Council's draft Policies Sites and Places Plan has been prepared to address issues raised in national policy for town centres and retailing.
2. The paper is published in support of the following policies:

### **PSP Part 1 Policies:**

- PSP32– Town Centre Uses (formerly Draft PSP 28 but with changed presentation)
- PSP33 - Local Centres and Parades (new policy following representations )
- PSP 34 - Shopping Frontages (formerly Draft PSP 29)
- PSP 35 - Public Houses – (formerly Draft PSP 30)
- PSP 36 - Hot food take-aways (formerly Draft PSP 31)

### **PSP Part 2 Policies:**

- Town centre summaries are contained within an Appendix to the Plan to support Part 2. Those summaries draw directly from the profiles prepared for each centre.
3. An initial draft of this paper was published in November 2013. It was updated in June 2014 alongside the initial draft PSP Plan and draft profiles for individual town centres. This further update, and the town centre profiles published separately, will form part of the supporting evidence base to the PSP Plan.
  4. In addition to this background paper the following profiles have been updated to May 2015 and are published alongside the Draft PSP.
    - Bradley Stoke Town Centre
    - Chipping Sodbury Town Centre
    - Downend Town Centre
    - Emersons Green Town Centre
    - Filton Town Centre
    - Hanham Town Centre
    - Kingswood Town Centre
    - Staple Hill – Town Centre
    - Thornbury Town Centre
    - Yate Town Centre
    - Patchway – Emerging District Centre
    - Stoke Gifford – Potential District Centre
  5. For completeness profiles were also published in November 2013 for three further areas - Cribbs Patchway New Neighbourhood Local Centres, Cribbs Causeway Retail Area, Longwell Green Retail Area. As these are not promoted as town centres it is not proposed to roll the profiles forward. Issues raised for these areas and for general strategy are covered in the engagement report at Appendix 1.

## **Further feedback sought**

6. The Council would welcome any further feedback on this background paper and on the profiles and draft PSP Policies but specifically further information or comment on:

- Any major inaccuracies or gaps in the evidence base for each centre
  - Unmet needs – retail, service and community uses.
  - Potential development sites.
  - The suggested vision and actions for each centre.
  - The suggested policy areas
    - Town Centre boundary
    - Primary Shopping Area boundary
    - Potential extensions to Primary Shopping Areas.
    - Primary and Secondary Shopping Frontages
7. While feedback is welcomed from any interested parties it will help if feedback for each centre can be coordinated to reflect a local consensus and vision e.g. on behalf of a partnership.

### **Presentation of background paper**

8. The paper is in two broad parts with appendices:

**Part 1** – considers:

- The role of the Policies, Sites and Places Plan in the context provided by current national and local policy for town centres and retail developments.
- The conclusions of research and monitoring reports which contribute to the evidence base which will be required to justify future policy.

**Part 2** – considers:

- The local context for the town centres and the ‘profiles’ prepared for them.
- Key issues raised through consultation (see also Appendix 1) .
- How these together have been used to inform draft PSP policies for town centre and retailing (PSP 32 - 34).

### **Appendices**

1. Engagement Report May 2015 – Town Centre and related policies and issues
  2. How South Gloucestershire is addressing NPPF Paragraphs 23 - 27.
  3. How South Gloucestershire is addressing National Planning Policy Guidance for town centres and retailing.
  4. South Gloucestershire Local Plan DPD Town Centres and Retailing - Notes of briefings held 14<sup>th</sup> November 2013 at Chipping Sodbury Town Hall
  5. Policy CS14 – Town Centres and Retail
  6. Portas Review – Extracts
  7. Grimsey Review – Extracts
  8. Future High Street Forum – Extracts
  9. DPDS – Capacity Review Study – Extracts
9. The broad programme for shaping policy is summarised in Table 1.

**Table 1 – Work programme in support of PSP Plan Town Centre Policies.**

Actions	Key Dates
South Gloucestershire Retail Study (Commissioned from Roger Tym and Partners)	2008 -2010 and 2011 update
Preparation and adoption of Core Strategy	Public Examination 2012-2013 Adoption December 2013
Preparation of the initial discussion paper and initial draft profiles	August/ September 2013
Town Centre Briefing Sessions (notes of the briefing session are provided at Appendix 4)	14 <sup>th</sup> November 2013
Feedback on draft profiles	November/December 2013
Investigation of issues and opportunities – including liaison with key landowners, developers and service providers where they have invited dialogue. Preparation of revised report and draft profiles	November 2013 - June 2014.
Independent review of SGC retail growth and capacity assumptions for each centre – undertaken by DPDS.	Published June 2014.
Consultation on draft Policies Sites and Places Plan with covering report and draft profiles as supporting evidence.	June – August 2014
Annual monitor of town centre retail floorspace	August 2014
Consideration of issues raised and refinement of draft policy.	August 2014 – March 2015
Decision to publish pre-submission draft Plan.	March 2015
Projected consultation on pre-submission draft PSP	May – July 2015
The aim is to provide further updates to profiles in response to comments received and annual monitoring	Ongoing - including August 2015 monitoring report
PSP Submission, Public Examination and Adoption processes	Autumn 2015 – Summer 2016
Proposed Strategic Policy Review – <ul style="list-style-type: none"> <li>• Housing and Employment – Initially through Joint Strategic Planning Strategy and then Local Plan review.</li> <li>• Retail Policy – as part of local plan review</li> </ul>	2015 – 2018 2016 -2018

## **Part 1 - Role of the Sites and Policies Plan**

### **The context provided by current national and local policy**

10. The National Planning Policy Framework sets national planning policy for town centres and allied developments. Paragraphs 23 -27 are of particular relevance. The overall aim is to promote vibrant, viable mixed-use town centres which meet the needs of local residents and service providers. It is also to resist development which would impact negatively on identified centres. Appendix 2 to this paper explains how the Council has addressed the principles set.
11. The Government published more detailed planning guidance in March 2014. This details how Local Planning Authorities should plan for town centre and town centre uses. Appendix 2 amplifies the work undertaken by this Council to meet those requirements.
12. In summary, to meet the aims of national policy and guidance, Core Strategy Policy CS14 provides the Council's strategic policy for town centre related development and Policies PSP 32-34 of the Policies, Sites and Places Plan add detail. This is further explained below.

### **South Gloucestershire Policy**

13. Core Strategy Policy CS14 picks up on issues raised within the NPPF it:
  - Reiterates the value of the retail, service and social functions of town centres.
  - Defines the primary role and function of ten existing town centres and two proposed new district centres.
  - Identifies overall retail growth needs based on local research - the key points being no fundamental need for new convenience floorspace and requirement for around 34,000 sq m of comparison floorspace in the period to 2026/27. Of that around 18,000 sq m is required by 2021.
  - Makes clear that the distribution of new retail floorspace will be through the Policies Sites and Places DPD which will provide detail and supersede the South Gloucestershire Local Plan adopted in January 2006.
  - It also identifies that there are
    - 49 existing smaller local centres and shopping parades
    - Major out of centre retail facilities at Cribbs/Causeway/The Mall, Abbeywood and Longwell Green Retail Parks.
14. For clarity any centres proposed within the three new neighbourhoods at North Yate, Cribbs/Patchway and East of Harry Stoke are intended to be developed as local centres rather than as recognised Town or District centres and may include retail, health, community and educational facilities.
15. In shaping policy the aim is to provide for vibrant and viable town and district centres that meet the needs of the communities they serve. The aim is to promote mixed use-town centres which have good local access and which meet retail and other needs.

### **Role of the Sites and Policies Plan**

16. In combination the Core Strategy and the Policies, Sites and Places Plan are seeking to address the range of issues raised in national guidance broadly as set out above. The Core Strategy provides general policy for town centre and retail developments (CS14) and in taking this forward the PSP Plan should provide any more detailed policies and proposals for individual town and district centres and should:

- Provide a vision for each centre.
- Set out proposals to meet retail growth needs taking account of national and local policies, local research and the physical capacity of each centre to accommodate growth.
- Ensure that other town centre issues are addressed including need for:
  - Civic and cultural facilities e.g. libraries, GP services etc
  - Commercial and mixed-use developments including offices and housing where relevant.
  - Local regeneration
  - Delivery of supporting infrastructure including transportation - public transport and car parking facilities etc
- Set policy area boundaries for each centre of the town centres which take account of the above vision and needs and which define:
  - The town centre as a whole (including civic buildings and spaces etc). Those boundaries are defined on the Policies Map by PSP 32.
  - The primary shopping area based on the main shopping frontages.
  - Primary and secondary shopping frontages. Those frontages are defined on the Policies Map and in policy PSP 34 with detail listed in the supporting text.
  - Known sites/areas to accommodate growth are identified on the proposals map as potential extensions to relevant primary shopping areas.
- A new policy (PSP 33) has been added to manage development within the local centres and parades within the District.

17. In preparing its plans the Council has a 'Duty to Co-operate' with neighbouring authorities. Provision was made for this during plan preparation and account taken of issues raised.

## Retail Studies

### The Roger Tym and Partners Study

18. As an input to the Core Strategy Roger Tym and Partners were appointed in 2008 to research and predict likely needs for differing forms of town centre floorspace over the plan period to 2026. The study also reviewed the general 'health' and development potential of the existing town centres. The study was published in 2010 and, following projected change in housing growth projections and objections related to the Mall, a further partial update was prepared in December 2011.

19. The RTP study's conclusions on future needs may be summarised as:

- a. **Convenience floorspace** – very little quantitative need – but qualitative and localised quantitative need in Chipping Sodbury and Hanham (both now with planning permission for medium sized foodstores)
- b. **Comparison floorspace** – the initial study projected need for up to 65,500 sq m net of comparison floorspace in the period to 2016. This was subsequently modified in the 2011 update report which took account of lower housing and economic growth projections resulting in the revised assessment of need as 34,000 sq m. The Study went further to suggest a distribution of new floorspace but that was not confirmed through the Core Strategy process and remains to be resolved through the Policies, Sites and Places Plan.

- c. **Commercial leisure** – potential expenditure growth of £196.9m of which about £100m would be for restaurants pubs and takeaways which could beneficially be met within and help to diversify town centres. Scope was also noted for a small-medium sized cinema in Yate which has subsequently been consented and is under construction.
- d. **Cultural facilities** – the study looked at strategic rather than local needs and concluded that:
  - Museums – Bristol is the major focus for South Gloucestershire local residents. Scope for an aviation museum at Filton.
  - Libraries – all town centres have libraries and scope to encourage better mix of uses.
  - Theatre and Live Music – no provision at present and focus on Bristol expenditure. Note local interest in facility in Thornbury.
  - Further work is required to address community needs for services and meeting space etc within each town centre.
- e. **Office requirements** – most existing local provision is on office parks rather than within town centres. Cross reference to the Employment Land Study and depressed state of the office market during a period of recession.

20. These messages were carried forward to help shape Core Strategy policy CS14. The draft policy took account of likely need and the ability of local centres to meet that need and proposed that 20,000 sq m of the emerging need be allocated to the Cribbs Causeway area.
21. The soundness of draft Policy CS14 was tested through the Core Strategy examination process. The Inspector concluded that both the strategic allocation for Cribbs Causeway and the proposals to remodel that area to provide a more sustainable form of development should be removed from the Core Strategy. In consequence the revised Core Strategy requires that, in the first instance, the Council should seek provision of the 34,000 sq m of comparison floorspace within the defined town and district centres. This approach was subsequently found sound and the adopted Core Strategy and CS14 follow these principles.

### **Annual monitoring**

22. For many years the Council has undertaken and published an annual audit of town centre floorspace. The survey is undertaken in August each year as a snap shot of uses mainly within primary and secondary shopping frontages within town centres but also including edge of, and out- of, centre stores.
23. The annual survey can be used over time to build a picture of change within a centre. The individual profiles for town centres draw heavily from the annual audits.

### **Local Briefings**

24. In November 2013 initial draft profiles were published for each town centre drawing from the RTP Study, annual monitoring, locally prepared strategies and Core Strategy policy. These were subject of briefings held for parish council's, key landowners and other interested parties at. (Notes of proceedings and questions raised at Appendix 4). Additional briefings were held with parish councils to invite responses to questionnaires which asked more general questions about development issues and sought ideas and proposals for town centres. Issues raised are covered within individual profiles.

### **Other relevant research and advice – national**

25. In recent years a number of experts and commentators have expressed concern for the future of the traditional high street and made recommendations for change in policy and approach. These include:

- The Portas review: a review for the Government by Mary Portas which was instrumental in setting up a number of pilot projects across the Country (December 2011) (See Appendix 6).
- The Grimsey Review (September 2013) - also expressed the need for a new approach to town centres encouraging them to become less focused on retail provision and to have a broader based community role (See Appendix 7).
- The Future High Streets Forum (May 2014) published a report on leadership as a follow up to the Portas Review. Its recommendations are reproduced at Appendix 8.

### **Local health checks**

26. The Portas Review made recommendations including the need for town centre health checks. Within South Gloucestershire some health check work had already been undertaken as part of strategies for the larger town centres and as part of the Roger Tyms study. In addition groups in Downend, Kingswood, Staple Hill and Thornbury chose to prepare their own health checks. A group in Chipping Sodbury has undertaken similar work as part of its parish plan process and other centres, including Hanham, have progressed local action plans.
27. Officers have made cross references to these locally prepared health checks within the relevant town centre profiles which have been prepared both to provide more consistent and comprehensive coverage including specific focus on land-use policy issues.

### **South Gloucestershire Retail Capacity Study 2014**

28. Prior to publication of the revised profiles and draft Policies, Sites and Places Plan the Council was keen to have an independent review of its emerging assumptions on the retail and physical capacity of each centre to accommodate growth. DPDS was commissioned to provide an initial check of the Council's working assumptions. The company is also retained to provide ongoing advice on retail issues for the PSP Plan and for individual planning applications.
29. The initial study concluded that the Council's assumptions were reasonable but indicated potential issues at Stoke Gifford and Emersons Green. The conclusions are summarised at Appendix 9 and the full report is published to the web. The Council is taking ongoing advice from DPDS in respect of major planning applications in the Cribbs Patchway new neighbourhood, The Mall, Asda, Cribbs Causeway and other sites as they arise.

### **Conclusions on national policy and research**

30. The Core Strategy and PSP Plan has been prepared in the context of national policy, best practice advice and local strategies which demonstrate recognition and understanding of the issues faced by the town centres in South Gloucestershire.

## **Part 2 - Draft Town Centre Profiles**

31. It is important that policies and proposals for individual town centres are based on a clear understanding of the issues and opportunities affecting those centres. The draft profiles were prepared to bring relevant information together and to invite feedback from local interests.
32. The Council does not currently have all of the information required to complete health checks for each centre. The profiles provide information where available and informed comment where not. The aim is for ongoing updating as part of the evidence base for each centre and for the PSP Plan.
33. The profiles do include reference to the Government's check list of 'Health Check' indicators but also provide commentaries on wider service and community facilities, community activities etc which all add to local vitality. The profiles also draw from, or cross refer, to local town centre partnership strategies where they are published.
34. The profiles gave an early mechanism to invite comment on potential policy area boundaries and development opportunities. Inevitably feedback has focused on very current issues within

centres (notably parking at Hanham); on organisational issues (e.g. Chipping Sodbury) and promotional and marketing issues stemming from the Portas report. These are all relevant to the health and welfare of the town centre but are not easily addressed through the spatial planning system. The profiles need to work alongside the work of Town Centre Strategy Groups and developer initiatives.

35. Contact has been made with a number of interested parties but to date there has not been comprehensive and detailed feedback for every centre. Where comments were made they were generally constructive and have been addressed within the individual profiles.
36. As the profiles have developed there has been some reordering of sections, for example to include a more comprehensive framework for consideration of potential actions.

### **Consultation and feedback**

37. While initial comments focussed on the content of profiles those at June 2014 tended to be more focused on emerging policy of the PSP and proposals for individual centres. The comments received tend to focus on application of the sequential and impact tests, meeting strategic growth and issues individual centres rather than the Council's broad approach but where there are cross cutting issues they are reflected below. (Appendix 1)
38. The profiles also focus on individual town centres but there is scope to provide more comparative analysis between centres e.g. to compare and contrast vacancy rates. That could be included in a future update of this background paper.

### **Conclusions on profiles**

39. The profiles have proved useful in setting out issues relevant to individual town centres and through that to inform the overall policy position including the capacity of centres to accommodate growth. Although largely based in land-use policy it is clear that full implementation of the visions and actions for each centre requires a broader approach and partnership working which to date it has proved difficult to resource.

## **Appendix 1 -**

### **Engagement Report May 2015 – Town Centre and related policies and issues**

1. The following annex report identifies issues raised in response to consultation on the Draft PSP Policies for Town Centres and Place Making and associated profiles at Summer 2014.
2. There is some overlap between representations for the town centre policies set out in Part 1 of the draft plan and the detailed policy boundaries and proposals for individual town and district centres which were initially set out in summaries at Part 2 and which are now presented as an Appendix to the PSP. For this reason the following tables group issues raised by theme and set out the Officers' proposed response and actions.
  1. Criticism of evidence base
  2. Criticism of PSP 32 wording and sequential test
  3. Criticism - Should ensure that retail needs will be met in full
  4. Criticism of retail park designations
  5. Policies 34 & 35 –
  6. Need policy to support local centres.
  7. Need policy to protect and maximise use of existing cultural facilities
  8. Comments on individual town centres are included within individual profiles - except for the Cribbs Patchway new neighbourhood, Cribbs Causeway retail area and Longwell Green profiles for which are not rolled forward.



**Annex 1 to Appendix 1  
Summary of Consultation Feedback Summer 2014 and how issues have been addressed**

1. Criticism of evidence base	Officer Comment/Change Made
<p><b>Turley for Bristol Alliance</b> Ref: 10761217</p> <p>Object:</p> <ul style="list-style-type: none"> <li>• Lack of robust evidence base;</li> <li>• no justification for proposed distribution of comparison floorspace;</li> <li>• allocation for more than 17,000 sq m to unspecified out of centre locations;</li> <li>• Lack of phasing - Core Strategy shows no need to 2016. 18,000 sq m by 2021 and 34,000 sq m by 2026.</li> <li>• no justification for designation of Cribbs Retail Park;</li> <li>• PSP32 and evidence base inconsistent with adopted Core Strategy;</li> <li>• Could undermine Bristol City Centre and Cabot Circus;</li> <li>• Could undermine retail</li> </ul>	<p>The draft plan did not fully explain and justify the approach taken in apportioning growth between centres. That is not a failure of the evidence base.</p> <p>The Core Strategy identifies need for 34,000 sq m additional comparison floorspace. The supporting evidence was the Roger Tym’s Study which was updated to December 2011. This noted growth potential in three phases:</p> <ol style="list-style-type: none"> <li>1. 2011 – 2016 – over supply – no new space required</li> <li>2. 2016 – 2021 - 18,298 sq m</li> <li>3. 2016 – 2026 – further 15,796 sq m</li> </ol> <p>The Capacity analysis undertaken and set out in the draft PSP indicated capacity for 17,859 sq m, the majority of which would be taken up in town centres by 2021.</p> <p>The approach did not consider growth beyond 2021 in any detail for two main reasons:</p> <ol style="list-style-type: none"> <li>1. There will be a review of the strategic study and demand around 2018 which may draw different conclusions on growth requirements beyond 2021.</li> <li>2. There can be little certainty now on the physical capacity of town centres to accommodate growth beyond 2021.</li> </ol> <p>There has also been some confusion over the status of the capacity figures presented for each centre. These were intended initially as a reflection of local retail and physical capacity to accommodate projected growth and not formal allocations of set amounts of growth. In working forward it is necessary to indicate the scale of comparison floorspace to be directed to each centre and the anticipated overall capacity of the centres to accommodate growth.</p> <p><b>Supporting text to PSP 34 that clarifies that the identified growth potential for town centres is geared towards what is achievable in the period to 2021 and indicate the scale of floorspace allocated to each centre.</b></p>

<p>hierarchy.</p> <ul style="list-style-type: none"> <li>All issues considered by Core Strategy Inspector.</li> </ul>	
<p><b>Turley for Bristol Alliance</b> Ref: 10761217</p> <p>PSP 32 allocations derived from DPDS study which is not robust evidence base - no reconsideration of floorspace requirements or retail trading patterns. cursory analysis of sites. Lack of market evidence. No safeguards to prevent floorspace being directed to out of centre locations - including Cribbs Causeway. Contrary to Inspectors conclusion that any floorspace directed towards the Mall/Cribbs Causeway would be at odds with the NPPF and town centre first approach.</p>	<p>The DPDS Capacity Study has not been presented as evidence in isolation. It simply provides an independent overview of the assumptions set out by the Officers in the individual town centre profiles to gauge whether these appear reasonable at this stage of the plan making process.</p> <p>It is accepted that the analysis of sites is somewhat cursory but the aim is to address any new information or major challenge to the Council's assumptions on growth capacity in response to consultation.</p> <p>The draft PSP is not allocating or providing for any significant retail growth at Cribbs Causeway and the Core Strategy already makes clear that any application there would need to satisfy the test of national policy.</p> <p><b>No change in response to this representation.</b></p>
<p><b>GVA for Crestbridge</b> Ref: 4604737</p> <p>Object to DPDS Capacity Study as an evidence base document. Not robust method for making allocations.</p>	<p>As above and also the Council's assumptions and DPDS Review have been subject of wider consultation. Issues have been raised as set out in this paper and amendments are considered where evidence leads to a changed conclusion.</p> <p><b>No change in response to this representation.</b></p>
<p><b>2. Criticism of PSP 32 wording and</b></p>	<p><b>Officer Comment/Change made</b></p>

sequential test	
<p><b>Bristol City Council</b> Ref: 5128193</p> <p>Policy has some inconsistencies with NPPF.</p> <p>Reference to sequential test is welcomed.</p> <p>Redraft to:</p> <ul style="list-style-type: none"> <li>• state sequential test earlier;</li> <li>• to split criterion 3 to refer to impact on:</li> </ul> <p>a) existing committed and planned public and private investment,</p> <p>b) town centre vitality and viability.</p>	<p>The Sequential and Impact Tests are set in national policy. The primary aim of policies CS14 and PSP 32 is to set out in more detail how those tests will be applied in South Gloucestershire by defining appropriate policy areas.</p> <ul style="list-style-type: none"> <li>• There is no need to restate the sequential approach in local policy but it is included for completeness.</li> <li>• The draft policy does refer to ‘retail’ permissions and allocations as commitments but the sequential test applies to all town centre uses not just retail. The text should therefore be amended to refer to town centre uses.</li> <li>• In respect of cumulative impact the policy should also refer to the potential impact on “existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal” in line with NPPF Para 26.</li> </ul> <p><b>Amend criterion 3 to read</b></p> <p><b>“Out of centre development of main town centre uses will only be acceptable where it can be demonstrated that, when considered with recently completed developments, outstanding planning commitments and allocations, proposals:</b></p> <p><b>3) would not have an unacceptable impact on</b></p> <p><b>a) existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal</b></p> <ul style="list-style-type: none"> <li>• <b>b) Town centre vitality and viability</b></li> </ul>
<p><b>Turley for Bristol Alliance</b> Ref: 10761217</p> <p>Core Strategy allocated 34,000 sq m to town and district centres. No allocations to non-town or district centres. "PSP 32 explicitly directs 17,000 sq m of comparison floorspace to out of centre</p>	<p>This representation appears to misinterpret the intention of the PSP Statement that “Residual/unallocated floorspace proposed in out-of-centre locations is already addressed under paragraph 9.26 of the Core Strategy”.</p> <p>This does not imply that all unallocated floorspace will be directed to out of centre locations. Only how proposals in out of centre locations will be addressed.</p> <p>The draft PSP identified capacity for around 18,000 sq m within town centres with a high degree of confidence that this can be delivered by 2021.</p> <p>The PSP is explicit that the residual unallocated floorspace (further 16,000 sq m) will be delivered as set out in Core Strategy paragraph 9.26 i.e. addressed through a replacement local plan/core strategy and that in the interim any</p>

<p>locations".</p> <p>Needs should be met in full. PSP does not do that. Should direct to town centres.</p>	<p>proposals for out of centre development will be considered against the NPPF sequential and Impact Tests.</p> <p><b>Change PSP 32 to set out more clearly how needs to 2021 will be met and how the residual floorspace need will be addressed through a future plan review. The sequential and impact tests will operate in the interim.</b></p>
<p><b>Turley for Bristol Alliance</b> Ref: 10761217</p> <p>Duty to co-operate requires need which cannot be met within South Gloucestershire town centres to be redirected to centres in neighbouring authorities.</p>	<p>The identified aim for 34,000 sq m of comparison floorspace is to meet needs generated largely within South Gloucestershire. The aim remains to meet that need within this District to minimise the need for travel. There is confidence that 18,000 sq m can be met to 2021 and the need for a review for the period 2021-2026 is recognised in policy.</p> <p><b>No change in response to this representation.</b></p>
<p><b>WYG for Sainsbury</b> Ref 4003233</p> <p>As noted in our previous representations paragraph 23 of the NPPF identifies that in drawing up Local Plans, LPA's should, amongst other things, identify 'Primary Shopping Areas'.</p> <p>Accordingly, in accordance with the NPPF the term 'Primary Retail Area' should be replaced with the correct term 'Primary Shopping Area'.</p>	<p>This is a small point with 'shopping' and 'retail' being largely interchangeable terms. If there is a distinction it is perhaps that retailing is the process of offering goods for sale and shopping is the process of buying them. Both activities take place in the same areas.</p> <p>No issue is raised in changing to read 'primary shopping area'.</p> <p><b>Amend references to 'primary retail areas' to read 'primary shopping areas'.</b></p>
<p><b>3. Should ensure that retail needs</b></p>	<p><b>Officer Comment/Change Made</b></p>

will met in full	
<p><b>NLP for Joint owners of the Mall</b> Ref: 7402657</p> <p>Core Strategy and Inspector's report make provision for 34,000 sq m comparison floorspace to 2026 with distribution to be through the PSP DPD or a replacement core strategy/Local plan.</p> <p>Support Council's approach of addressing through PSP DPD. However capacity work only indicates 17,859 sq m leaving 16,141 sq m to be delivered in accord with retail policy (sequential and impact tests).</p> <p>This is contrary to NPPF guidance. NPPF para 23 states 'it is important that retail, leisure office and other main town centre uses are met in full and are not compromised by limited site availability.</p> <p>NPPG says that where needs cannot be met in a town centre planning authorities should plan positively to identify the most appropriate alternative strategy for meeting need.</p>	<p>The Core Strategy identifies need for 34,000 sq m of comparison floorspace by 2026 but the supporting evidence base (updated Roger Tym Study) is clear that demand is phased with oversupply to 2016, need for around 18,000 sq m by 2021 and indications of need for a further 16,000 sq m by 2026.</p> <p>The Study (at para 5.1) notes that “we award most weight to the figures to 2021 with the least weight to the last five years of the quantitative need between 2021 and 2026 and therefore the figures should be treated as indicative only. It is for this reason of long-term uncertainty in projecting needs that the Council intends to review the strategic study and policy by 2018 to provide for greater certainty on need and town centre capacity beyond 2021.</p> <p>The PSP does set out how need to 2021 can be met in full and the mechanism for rolling that forward to 2026 has already been found sound by the Core Strategy Inspector. This is the most appropriate alternative strategy for meeting longer term needs.</p> <p><b>No change in response to this representation.</b></p>

4. Criticism of retail park designations	Officer Comment / Changes Made
<p><b>Bristol City Council</b> Ref: 5128193</p> <p>Purpose of retail park designations is not clear - not addressed in policy and is not consistent with NPPF. NPPF does not distinguish between differing forms of out-of-centre retail. Requests deletion of designations.</p>	<p>The retail parks at Abbeywood, Cribbs Causeway and Longwell Green were developed at a time when there was less emphasis on the protection of town centres and in recognition of the need to provide for bulky goods retailing in large format stores.</p> <p>Earlier Statutory Plans generally sought to limit floorspace in retail parks to meet bulky goods needs such as furniture and DIY stores. However it has become increasingly difficult to limit the types of goods sold by condition.</p> <p>The South Gloucestershire Local Plan recognised the existence of the three retail parks (policies RT5 and RT6) and considered that these should be included in the sequential test after town centre and edge of centre locations but ahead of free standing locations.</p> <p>While the NPPF does not refer to differing forms of out centre designations the Core Strategy specifically refers to the retail parks and identifies them as out of centre. It does not carry forward the RT5 point that Retail Parks are sequentially preferable to retail development in free standing locations.</p> <p>As retail parks no longer have a recognised status in national policy it is proposed to treat proposals there as for other forms out of centre development and the former designated boundaries will be removed. Where development is considered acceptable in terms of the town centre sequential and impact tests proposals should make a positive contribution towards improving non-car circulation and the physical and visual integration of the retail park, including landscaping and public realm. This is covered in the criteria at Part 4 of the policy.</p> <p><b>Delete retail park boundaries and treat as for other forms of out of centre development but with the aim of still providing for environmental and other local improvements in line with Part 4 of the policy and where development is acceptable in terms of the sequential and impact tests.</b></p>
<p><b>Turley for Bristol Alliance</b> Ref: 10761217</p> <p>No justification for designation of the Cribbs Causeway Retail Park.</p>	<p>As above</p> <p><b>As above</b></p>

5. Policies 34 Shopping Frontages and 35 Public Houses	Officer Comment / Change Made
<p><b>Yate Town Council</b></p> <p>PSP28 (now PSP 34)</p> <p>Object in the context of Yate Town Centre. We are all working on diversifying Yate Town Centre, to include evening economy activities, such as restaurants, yet this policy would work against such change.</p>	<p>The NPPF (para 23) requires local planning authorities , amongst other things, to define the extent of town centre and primary shopping areas, based on a clear definition of primary and secondary shopping frontages in designated centres and set policies that make clear which uses will be permitted in such locations.</p> <p>PSP 35 seeks to take that approach forward by defining frontages and policies for them. In large part that approach has been carried forward from the South Gloucestershire Local Plan Policy RT9.</p> <p>The questions now are:</p> <ol style="list-style-type: none"> <li>1. whether appropriate frontages are designated?</li> <li>2. whether the policies for those frontages are appropriate?</li> </ol> <p>The inference of the representation is that application of the policy as drafted would limit scope for beneficial change, and specifically promotion of the evening economy, within Yate.</p> <p>The Officers would suggest that the approach is justifiable in that it largely directs evening uses to secondary frontages at the margins of the shopping centre where they can best support the evening economy without undermining the continuity of the main shopping area. There has been recent change to introduce a pub and restaurants in this way.</p> <p>Within primary frontages the policy does allow for change providing vitality and appropriate retail character of the window display will be maintained.</p> <p><b>No change in response to this representation.</b></p>
<p><b>Yate Town Council</b></p> <p>PSP30 (Now PSP 35)</p> <p>Whilst in general we know there is a need to protect public houses, we are aware of examples where that is not the case – for example retail units on the Yate town centre island which have been converted to a public house, should this policy oppose its</p>	<p>The policy and supporting text is clearly drafted in the context of traditional public houses. There is always the scope for the Development Management process to conclude that local circumstances outweigh the general policy presumption against change.</p> <p>The second point made in respect of external space associated with pubs is of note as change can impact on subsequent operation and viability of the premises and on neighbouring properties. Officers consider however that this can generally be addressed through the general design policies of the plan.</p> <p><b>No change in response to this representation</b></p>

<p>conversion back to shops?</p> <p>The policy also does not deal with a key local problem we are encountering – the redevelopment of outside spaces either in part for residential use or for intensified late night entertainment.</p>	
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<p><b>6. Need policy to support local centres.</b></p>	<p><b>Officer Comment / Change made</b></p>
<p><b>Yate Town Council</b> Ref. 330593</p> <p>Need policy support for local centres - e.g. Abbotswood - design to promote and encourage pedestrian access to local and sub-local centres.</p>	<p>The Core Strategy lists 49 local centres and parades. PSP 32 as drafted stated that they are identified on the proposals map. This work has not yet been done and would prove difficult.</p> <p>Local Centres are not included within the sequential test as they generally do not have the scale or character of site available to meet strategic needs.</p> <p>Core Strategy Policy CS14 does state that “Development in local centres/parades will be primarily to meet local needs only and of a scale appropriate to the role and function of the centre/parade and where it would not harm the vitality and viability of other centres”. There is also reference to safeguarding local amenities in CS13 and the NPPF.</p> <p>The inference of this rep, and others below, is that a more proactive policy is required to set out proposals to support and promote local centres.</p> <p>There are three broad options for this:</p> <ol style="list-style-type: none"> <li>1. Do nothing and rely on policy as drafted or with minor amendment.</li> <li>2. Introduce a new general policy for promotion and retrofitting of local centres e.g. as a PSP 28A.</li> <li>3. Introduce centre specific policies within the place making section of the plan e.g. for Abbotswood.</li> </ol> <p>On balance the Officers suggest that a new PSP 28A would be helpful. In general terms this could be by a cross reference to locally prepared enhancement strategies as are currently being prepared for the Abbotswood and Coniston Centres.</p>

	<p><b>New policy PSP 28A (now PSP33).</b></p> <p><b>The role and function of local shopping centres and parades and other local facilities will be protected and enhanced through:</b></p> <ol style="list-style-type: none"> <li><b>1) The retention and diversification of existing, and the provision of new shopping and service uses appropriate to the scale and character of the location and local needs.</b></li> <li><b>2) Enhancement of access for pedestrians, cyclist and those with impaired mobility.</b></li> <li><b>3) Retention and enhancement of car parking facilities that prioritise short stay.</b></li> <li><b>4) Appropriate environmental improvements.</b></li> <li><b>5) Bringing vacant shop floorspace and living space back into active use.</b></li> </ol> <p><b>Proposals which would result in the loss of vitality in a local centre or result in deterioration in its physical environment will not be permitted.</b></p>
<p><b>Resident</b> Ref 10764255 Better Town Centre and regeneration facilities at Gloucester Road North, Filton</p>	<p>As above</p> <p><b>As above</b></p>
<p><b>Filton Town Council</b> Ref: 8064801 Aspirations ii) improvements to the shopping area near the Bulldog PH on Filton Ave, Northville.</p>	<p>As above</p> <p><b>As above</b></p>
<p><b>Resident</b> 10764255 Knock down the parade of shops on Coniston Road and rebuild as a centre.</p>	<p>As above</p> <p><b>As above</b></p>

7. Need policy to protect and maximise use of existing cultural facilities	Officer Comment / Change Made
<p>Rose Freeman for <b>Theatres Trust</b> Ref: 10757729</p> <p>PSP28 does not reflect contribution of arts and tourism facilities to the evening economy. Policy should provide for protection of a range of facilities. Policy should pick up on CS23 which deals with community infrastructure and cultural activity.</p> <p>PSP28 should address Item 70 of NPPF – i.e. to plan for shared use of space and guard against unnecessary loss of valued facilities and that established facilities are retained. Should take priority over the provision of new facilities.</p>	<p>As noted in the representation CS23 already safeguards existing community infrastructure with exceptions. This representation is seeking a more proactive approach and statement in relation to the evening economy within PSP28.</p> <p>Draft PSP28 does refer to uses ‘which contribute to vitality and viability of the centre at all times of the day’ That might be better worded as ‘during the day and in support of the evening economy’,</p> <p>The representation goes further to suggest that support for existing facilities should be a higher priority than the provision of new. Officers do not accept that this is necessarily the most appropriate way forward. Some older facilities are out dated and replacement can offer advantage and efficiencies. The Council has recently started an area based asset management process (Pilot area in Pathway) which aims to look at the provision of community based facilities in the round. Ideally key outputs of the process would be reflected in the PSP but the timing is unlikely to coincide with PSP deadlines in which case it is preferable to include a reference to the ongoing Asset Management Process.</p> <p><b>Amend PSP 28 (now PSP32) to include specific reference to the evening economy.</b></p> <p><b>Include the aims of the asset management process as part of the supporting text to PSP 28 (now PSP32).</b></p>

Cribbs Causeway	Officer Comment / Change Made
<p>NLP for <b>Joint owners of the Mall</b> Ref: 7402657</p> <p>1. DPDS reviews Council assumptions on town centre physical and retail capacity to accommodate comparison floorspace and conclude total scope for 17,859 sq</p>	<p>1. Correct.</p>

<p>m.</p> <ol style="list-style-type: none"> <li>2. Do not dispute that conclusion but question why process did not go further to address the balance of identified need.</li> <li>3. Council's approach is flawed (not sound) in not meeting needs in full - should comply with steps set out in NPPG 009.</li> <li>4. The Mall is well positioned to meet shortfall in provision.</li> <li>5. Should look to allocate there (The Mall) rather than risk speculative applications in less appropriate locations</li> <li>6. May need to address issues on a sub-regional basis as required by Duty to co-operate.</li> </ol>	<ol style="list-style-type: none"> <li>2. Broad agreement of capacity work noted and welcomed. The Council's approach has been to ensure that as far as possible needs identified for the period to 2021, about which there can be some certainty, are recognised and met. Needs and capacity beyond 2021 to 2026/2027 are less certain and are therefore to be rolled forward and reviewed in a future plan. This will still allow time for implementation.</li> <li>3. Identified needs to 2021 are met in full. The process for managing residual needs is set out in paragraph 9.26 of the Core Strategy and has been found sound.</li> <li>4. Residual needs beyond 2021 may be met in a number of ways of which expansion of the Mall is only one option of several to be investigated as and when there is more certainty on the scale and nature of residual need.</li> <li>5. Refer to point 4 above.</li> <li>6. Agree that there is a duty to cooperate on a sub- regional basis.</li> </ol> <p><b>No change in response to this representation.</b></p>
<p><b>Turley for Bristol Alliance</b> Ref: 10761217</p> <p>Core Strategy inspector requires "the implications of the proposed changes (at the Mall) to be fully explored in conjunction with other operators and local authorities, prior to a decision on the long-term role of this area in the shopping hierarchy". Council's approach wholly inappropriate, not supported by evidence and contrary to its own Core</p>	<p>It is not clear what element of the Councils approach is being questioned. The representation seems to imply that the draft PSP Plan is supporting growth at the Mall –which it is not.</p> <p>The Council sought to influence the future planning of the Cribbs Causeway Area but the Draft Core Strategy was subject of objection which has resulted in a position where a speculative has been made and where any policy aims that the Council may have considered at that time are now less clearly expressed. The default position is as set out in Paragraph 9.26 of the Core Strategy which has been found sound.</p> <p><b>No change in response to this representation.</b></p>

<p>Strategy.</p>	
<p><b>Resident</b> Ref: 294121</p> <p>To a lay person the distinction between various types of retail at Cribbs Causeway serves no purpose. The whole retail area including The Mall, retail warehouses, car showrooms should all be treated as one comprehensive retail area.</p>	<p>The logic of this representation is recognised but it has proved difficult for the Council to plan positively for change in this area following objections from those who appear to feel threatened by discussion of Cribbs Causeway as anything other than blanket out of centre floorspace.</p> <p><b>No change in response to this representation.</b></p>
<p><b>Resident</b> 6107745</p> <p>No comment about Cribbs Retail park which I am happy to see developed. I think old town centres need to find a new life.</p>	<p>Noted – discussion of future options for Cribbs Causeway is frustrated by the current policy context.</p> <p><b>No change in response to this representation.</b></p>
<p><b>Resident</b> Ref: 10764255</p> <p>Cribbs Causeway needs to become a new north Bristol City centre with Bank Post office and night time economy</p>	<p>Noted - discussion of future options for Cribbs Causeway is frustrated by the current policy context.</p> <p><b>No change in response to this representation.</b></p>
<p><b>Resident</b> Ref: 10764255</p> <p>New bus station at Cribbs Causeway with interchange for coaches including National Express and mega bus and</p>	<p>Noted - discussion of future options for Cribbs Causeway is frustrated by the current policy context.</p> <p><b>No change in response to this representation.</b></p>

<p>rail link bus to Henbury Station</p>	
<p><b>Resident</b>  Ref: 10764255  Retain retail trading estate adjoining Cribbs Causeway. Expand the shopping centre by rebuilding the centre including some bulky goods floor space.</p>	<p>Noted - discussion of future options for Cribbs Causeway is frustrated by the current policy context.  <b>No change in response to this representation.</b></p>
<p><b>Resident</b>  Ref: 10764255  The retail park and the Mall, Morrison, Sainsbury and Asda should be rezoned as a District centre/North Bristol City Centre with all of the facilities of a city centre for 900 homes. Multi-storey car parks should be built to release more land for housing. Need good quality urban design.</p>	<p>Noted - discussion of future options for Cribbs Causeway is frustrated by the current policy context.  <b>All floorspace and land at Cribbs Causeway is to be treated as out of centre.</b></p>
<p>Origin 3 for <b>M Johnson</b>  Ref: 10797505  Request minor amendment to Retail park boundary to reflect permission (PT05/047/O for retail development between Morrison and M5 Junction 17.</p>	<p>This is a very detailed site boundary change. However given other representations the proposal is to remove the retail park designation and to treat all land at Cribbs Causeway as out of centre.  <b>Delete Cribbs Causeway Retail Park Boundary.</b></p>

Longwell Green	Officer Comment / Change Made
<p>Alder King for <b>CBRE and Savilles Freight</b> Ref: 3788481</p> <p>Combined site at Longwell Green should be allocated for comparison retail to address identified requirement over the plan period. Retail (PBA) and Transport (TPA) assessments are included. Representation also addresses potential benefits and loss of safeguarded employment land.</p>	<p>The Council has identified how needs identified for the period to 2021 can be met in town centres through a plan led process. There is no overriding need to commit to provision of floorspace for the period beyond 2021 in advance of a new retail study and Core Strategy Review.</p> <p><b>No change in response to this representation.</b></p>
<p><b>Resident</b> 10764225</p> <p>Welcome Longwell Green Retail Park and would like to see public transport and walking improvements</p>	<p>Noted. However given other representations the proposal is to remove the retail park designations at Cribbs Causeway and Longwell Green and treat as out of centre.</p> <p><b>No change in response to this representation.</b></p>

## Appendix 2 – How South Gloucestershire is addressing NPPF Paragraphs 23 - 27.

National Planning Policy Framework	South Gloucestershire approach
<p><b>Paragraph 23</b>            Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.</p> <p>In drawing up Local Plans local planning authorities should:</p>	<p>The Council’s commitment to and strategic policy for town centres is set out in the Core Strategy at Policy CS14 and within the Visions and policies for key spatial areas. The Core Strategy was subject of public examination, found sound and subsequently adopted - in December 2013.</p>
<ul style="list-style-type: none"> <li>○ Recognise town centres as the heart of their communities – and pursue policies to support their viability and vitality</li> </ul>	<p>CS14 states that the council will work with partner organisations and the local community to protect and enhance the vitality and viability of existing town centres in recognition of their retail, service and social functions.</p> <p>CS14 also refers to “shops and services, both in urban and rural areas, are also safeguarded from loss under policy CS13 and policies in the NPPF.”</p>
<ul style="list-style-type: none"> <li>○ Define a network and hierarchy of centres that is resilient to anticipated future economic changes;</li> </ul>	<p>CS14 sets a hierarchy of centres –</p> <ul style="list-style-type: none"> <li>• Town centres (10 identified)</li> <li>• District centres (2 identified)</li> <li>• Local centres and parades (49 identified) – A new policy PSP33 is proposed to manage change within these centres.</li> <li>• Out of centre – (3 retail areas/parks (identified)).</li> </ul>
<ul style="list-style-type: none"> <li>○ Define the extent of town centres and primary shopping areas based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which</li> </ul>	<p>The draft Policies Sites and Places Plan defines, as a basis for consultation:</p> <ul style="list-style-type: none"> <li>• At PSP32:               <ul style="list-style-type: none"> <li>• Town centre policy boundaries</li> </ul> </li> </ul>

<p>uses will be permitted in such locations;</p>	<ul style="list-style-type: none"> <li>• Primary shopping area boundaries</li> <li>• At PSP 33: <ul style="list-style-type: none"> <li>• Primary and secondary shopping frontages.</li> </ul> </li> </ul> <p>The draft boundaries and frontages have been drawn from the town centre profiles which look at each centre in detail.</p>
<p>○ Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres.</p>	<p>CS14 and PSP 32 set out policy tests for the main town centre uses.</p> <p>The profiles provide commentaries on the current mix of uses and character of each centre and known issues within them. Where they exist they draw from locally prepared strategies and health checks to provide context for defining policy boundaries and for the development of local development strategies.</p>
<p>○ Retain and enhance existing markets and, where appropriate, re-introduce or create new ones which ensure that markets remain attractive and competitive.</p>	<p>Each profile considers whether markets exist in a centre or are likely to be developed. In general terms South Gloucestershire does not have a history of indoor markets. Some centres have:</p> <ul style="list-style-type: none"> <li>• Stalls markets (e.g. Thornbury),</li> <li>• Farmers markets (e.g. Thornbury and Chipping Sodbury)</li> <li>• Market stalls within the main retail area (e.g. Yate and Bradley Stoke).</li> <li>• Occasional street fairs (e.g. Thornbury, Chipping Sodbury and Staple Hill)</li> <li>• Community, craft, antique and collectors fairs (e.g. Thornbury and Chipping Sodbury)</li> </ul> <p>Markets and fairs require a promoter or promoting body.</p>
<p>○ Allocate a range of suitable sites to meet the scale and type needed for retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and not compromised by limited site availability. Local</p>	<p>There have been six main sources of ‘information’ on future needs:</p> <ol style="list-style-type: none"> <li>1. The RTP Study which was undertaken for the Council between 2008-2010 and updated to 2011.</li> <li>2. The questionnaire to town and parish councils (question 3 in particular)</li> <li>3. The call for sites</li> <li>4. Feedback on individual profiles.</li> </ol>

<p>planning authorities should undertake an assessment of the need to expand town centres to provide sufficient suitable sites;</p>	<p>5. Strategic policy and proposals for new neighbourhoods</p> <p>6. Planning applications and pre-application enquiries.</p> <p>Other than for retail uses few specific needs were identified through this process and relatively few site specific proposals or allocations are suggested in the draft PSP Plan.</p> <p>The NPPF aim is for identified needs for the main town centre uses to be met in full. The RTP Study concluded that:</p> <ul style="list-style-type: none"> <li>• There is no projected need for additional convenience floorspace.</li> <li>• For comparison floorspace there is potentially need for 34,000 sq m in the period to 2027. Of this the projected need is for around 18,000 sq m by 2021.</li> </ul> <p>Given uncertainty in need beyond 2021 and the likelihood of a further policy review by 2018 PSP 32 focuses on meeting needs to 2021. The Council’s assumptions on the ability of each centre to accommodate retail growth are set out in the profiles and are included as policy within a Table at PSP32.</p> <p>The Council’s approach to the residual amount (potentially around 16,000 sq m 2021-2026/27) is addressed at Core Strategy Paragraph 9.26.</p>
<p>○ Allocate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting needs in other accessible locations that are well connected to the town centre.</p>	<p>PSP 32 seeks to:</p> <ul style="list-style-type: none"> <li>• Identify sites within or adjacent to town centres that have the benefit of planning permission or a strong indication of development potential but which are not yet developed as ‘potential primary shopping areas’.</li> </ul>
<p>○ Set policies for consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;</p>	<p>PSP32 seeks to:</p> <ul style="list-style-type: none"> <li>• Direct main town centre uses within the boundaries of town centres defined on the policies map.</li> <li>• Direct retail uses to the primary shopping areas and potential primary shopping areas defined on the policies map.</li> </ul>

	<p>PSP 32 part 5 reiterates the sequential and impact tests set out in the NPPF. (See also Appendix 2 below for more specific reference to application of the sequential and impact tests).</p>
<ul style="list-style-type: none"> <li>○ Recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites;</li> </ul>	<p>The profiles reflect the existing character of town centres. Some have retail uses within and above shopping frontages or as part of a wider town centre. Others tend to have more of a retail park character with a more limited mix of uses.</p> <p>In general terms the aim is to meet retail needs within the defined primary retail areas while at the same time encouraging a greater mix of uses including residential.</p> <p>PSP 32 part 4 point 6 seeks to “include and make positive use of upper floors”. This is to ensure that as far as possible proposals make efficient use of land by avoiding single storey development and ensuring that residential or other uses are included in upper floors.</p>
<ul style="list-style-type: none"> <li>○ Where town centres are in decline local planning authorities should plan positively to encourage their future economic activity.</li> </ul>	<p>None of the town centres is identified as being in decline through high or increasing vacancy. The increase in charity shops and catering outlets in some centres has been raised as a possible indicator of decline but in general terms this reflects centres which are adapting to change.</p> <p>Hanham traders have expressed concern for current trading due to the loss of a key car park. That position would ease if either the Tesco store is developed or an alternative car park site can be found. In either case the PSP Plan is more likely to reflect the outcome of developments than be able to influence them.</p> <p>There are centres where individual areas, rather than the town centre as a whole, may be at risk of decline. There are also some local centres and parades which appear to be struggling. The Council is keen to work with landowners and communities to address issues in these areas, in parallel with the PSP Plan but not necessarily as part of it.</p>
<p><b>Paragraph 24 – Sequential test</b> Apply a sequential test to planning applications for main town centre uses and require applications for main town centre uses to be located;</p> <ul style="list-style-type: none"> <li>● In town centres</li> <li>● Then in edge of centre locations, and,</li> </ul>	<p>Both CS14 and PSP32 cross refer to the sequential test and indicate how it should be applied within South Gloucestershire.</p> <p>At this stage the profiles and Policy PSP32 are published in draft. As far as possible capacity assumptions have been refined following consultation and consideration of any issues raised. If it appears that there is a residual shortfall in comparison floorspace Core Strategy paragraph 9.26 will be used to guide future work.</p>

<ul style="list-style-type: none"> <li>• Only if suitable sites are not available should out of centre sites be considered with preference to accessible sites that are well connected to the town centre.</li> </ul>	
<p><b>Paragraph 25 – rural development</b> The sequential test does not apply to small scale rural offices and other small scale rural development</p>	<p>PSP32 makes clear that the sequential test will not apply to small scale rural developments – but does not provide specific thresholds. ‘Small scale’ will need to be assessed in the context of individual locations.</p>
<p><b>Paragraph 26 – impact assessment</b> For retail, leisure and office development require an impact assessment if the development is over a locally set threshold. Assess impact on</p> <ul style="list-style-type: none"> <li>• Existing, committed and planned public and private investment in local centres,</li> <li>• Town centre vitality and viability, including local consumer choice and trade in the town centre and wider area up to five years form the time the application is made (Ten years for major schemes).</li> </ul>	<p>Policy CS14 sets a local threshold of 1,000 sq m gross floorspace.</p>
<p><b>Paragraph 27 – Decision</b> Where an application fails to satisfy the sequential test or is likely to have a significant adverse impact it should be refused.</p>	<p>The judgement can only be made in the context of individual proposals but policies CSS14 and PSP32 do reinforce the need to follow the sequential and impact tests when assessing out of centre proposals.</p>
	<p>Advice on health check indicators has changed over time. Some data is difficult to collect and monitor on a reliable and consistent basis. The RTP Study did provide some data but that has not been updated in full. The Profiles therefore reflect a more general commentary without ‘hard data’ on some indicators but which can still provide useful context for decisions on planning policy within individual centres. If significant issues are raised data may need to be researched.</p>

### Appendix 3 – How South Gloucestershire is addressing National Planning Policy Guidance for town centres and retailing.

National Planning Guidance for town centres	SGC Approach
<p><b>1. What does the National Planning Policy Framework say about planning for town centres?</b> (Paragraph: 001 Reference ID: 2b-001-20140306 - Revision date: 06 03 2014)</p>	
<p>Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres and create attractive, diverse places where people want to live, visit and work.</p>	<p>The research undertaken in preparation of the core strategy and the further work and town centre profiles prepared in support of the PSP Plan demonstrate that the Council is both committed to supporting town centres and to ensuring that as far as possible the issues within individual town centres are understood and addressed.</p> <p>In all cases the Council is seeking to ensure that town and district centres are diverse in terms of land use mix and distinctive in being of different character to neighbouring centres.</p>
<p>Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a ‘town centre first’ approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre.</p>	<p>In this context the PSP Plan is seeking to address the needs of ten town centres and two emerging centres. It has a generic approach in PSP 32.</p> <p>The original aim was to address any known centre specific issues in the relevant spatial sections at Section 2 of the Plan. However as proposals are limited the summaries for individual town centres, drawn from the profiles, have been moved from Part 2 into an Appendix to the plan.</p> <p>The main issue is that the PSP Plan can only reflect the outcomes of detailed work set out in local visions and strategies.</p> <p>The Core Strategy projections of retail need run to 2027 but, as noted in national guidance, there is more certainty around needs in the early years. This is reflected in the approach of PSP32 which seeks to focus on needs to 2021.</p> <p>It is recognised that there may need to be further review of both the</p>

	strategic quantum and hence growth potential for each centre as part of a new strategic study and revised core strategy.
<p>This positive approach should include seeking to improve the quality of parking in town centres (in line with the National Planning Policy Framework) and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers.</p>	<p>The PSP Plan is primarily concerned with the management of development. Promotion and regeneration of town centres requires broader action.</p> <p>Within South Gloucestershire recent town centre strategy work has been coordinated through the economic development service. While there has been good work in some centres it has not proved practical to initiate and support regular strategy groups and meetings in all centres. The strategies and health checks which have progressed tend to be set in the context of the Portas Review and focus on management and promotional activities rather than addressing land-use issues.</p> <p>The profiles have been prepared to provide more consistent coverage of all centres, to draw down from health checks and strategies where available, and to provide a more specific focus on land-use policy issues. They conclude with recommendations for a vision, town centre policy areas and primary and secondary frontages. They also include commentaries on the scope for other improvements e.g. access and parking. However the Council is reluctant to take them forward as ‘strategies’ without clear evidence of local support.</p>
<p>The National Planning Policy Framework sets out two key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions and may be useful in informing the preparation of Local Plans.</p>	<p><b>Note – NPPG Annex 2 – Glossary - Main town centre uses</b></p> <ul style="list-style-type: none"> <li>• <b>Main town centre uses:</b> Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Economic development:</b> Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).</li> <li>• <b>Edge of centre:</b> For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.</li> </ul>
<p>The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test.</p>	<p>The sequential test is stated before the impact test within PSP32.</p>
<p>The impact test determines whether there would be likely significant adverse impacts of locating main town centre development outside of existing town centres (and therefore whether the proposal should be refused in line with policy). It applies only above a floorspace threshold as set out in paragraph 26 of the National Planning Policy Framework.</p> <p>Related policy: <b>National Planning Policy Framework - Paragraph 26 – the assessment of out of centre proposals.</b></p>	<p>The threshold for impact tests is set at CS14.</p>
<p><b>2. Why is it important to have a strategic vision for town centres?</b> (Paragraph: 002 Reference ID: 2b-002-20140306 - Revision date: 06 03 2014)</p> <p>A positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits. Once adopted a <a href="#">Local Plan</a>, including any town centre policy that it</p>	<p>Core Strategy policy CS14 highlights the need to work with local interests to enhance town centre.</p>

<p>contains, will be the starting point for any decisions on individual developments. Local planning authorities should work with the private sector, Portas Pilot organisations, town teams, neighbourhood planning groups, town centre management organisations and other relevant groups when developing such strategies. Non-planning guidance produced by other Government Departments and the sector may be useful in producing such a strategy.</p>	<p>The profiles seek to address the issues of land-use mix within centres and incorporate key messages around the timing of delivery and complimentary promotional strategies which are already being pursued (e.g. traffic management in Chipping Sodbury, renewal in Patchway).</p> <p>In summary while the profiles aim to be broad based the PSP Plan is only part of the range of actions which may be followed.</p>
<p><b>3. What should a town centre strategy contain?</b> (Paragraph: 003 Reference ID: 2b-003-20140306 Revision date: 06 03 2014)</p> <p>Any strategy should be based on evidence of the <a href="#">current state of town centres</a> and opportunities to meet development needs and support their viability and vitality. Strategies should answer the following questions:</p> <ul style="list-style-type: none"> <li>• What is the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period? This will involve auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and different types of development. This assessment should cover a three-five year period, but should also take the lifetime of the Local Plan into account and be regularly reviewed.</li> <li>• What is the vision for the future of each town centre? This should consider what the most appropriate mix of uses would be to enhance overall vitality and viability</li> <li>• Can the town centre accommodate the scale of assessed need for main town centre uses? This should include considering expanding centres, or development opportunities to enable new development or redevelop existing under-utilised space. It should involve evaluating different policy options (for example expanding the market share of a particular centre) or the implications of wider policy such as infrastructure delivery and demographic or economic change.</li> <li>• In what timeframe should new retail floorspace be provided?</li> </ul>	<p>The profiles address the current state of town centres through a broad health check approach.</p> <p>The function and hierarchy is defined within CS14. PSP 32 goes further to define policy area boundaries, the overall growth capacity for each centre and opportunities for expansion where known. The analysis work does look longer than 3-5 years by considering capacity to 2021 – but not the full period of the plan on the assumption than an interim review will be undertaken of both retail capacity and policy.</p> <p>A vision for each centre is set out in the profile and carried forward into the Summary text at Appendix 3 of the PSDP Plan.</p>

- What complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how can these be planned and delivered?
- How can parking provision be enhanced and both parking charges and enforcement be made proportionate, in order to encourage town centre vitality?

Strategies should identify changes in the hierarchy of town centres, including where a town centre is in decline. In these cases, strategies should seek to manage decline positively to encourage economic activity and achieve an appropriate mix of uses commensurate with a realistic future for that town centre.

Each profile considers the scope of a centre to accommodate further growth. The Council's assumptions have been subject of independent review through the work of DPDS and through consultation.

The PSP plan seeks to provide certainty on retail and town centre needs for the period to 2021.

The profiles reflect other local strategies including locally prepared health checks and parish plans where available and allied issues such as parking and promotional activity.

While parking has been raised as an issue in some centres (most notably Hanham) it is difficult to address additional provision through the PSP process when there is an existing unimplemented food store proposal which will ease pressures when implemented.

None of the Districts centres are in such decline that an alternative

	strategy is deemed appropriate.
<p><b>4. How should market signals be addressed when planning for town centres?</b>  Paragraph: 004 Reference ID: 2b-004-20140306 - Revision date: 06 03 2014)</p> <p>Local planning authorities should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.</p>	<p>The Council's growth assumptions reflect physical and market conditions. They have been subject of independent review by DPDS. Further feedback from landowners, retailers and strategy groups etc will be welcomed to help present the most up to date and realistic picture possible.</p>
<p><b>5. Which indicators should be used to determine the health of town centres?</b>  (Paragraph: 005 Reference ID: 2b-005-20140306 Revision date: 06 03 2014)</p> <p>The following indicators, and their changes over time, are relevant in assessing the health of town centres:</p> <ul style="list-style-type: none"> <li>• diversity of uses</li> <li>• proportion of vacant street level property</li> <li>• commercial yields on non-domestic property</li> <li>• customers' views and behaviour</li> <li>• retailer representation and intentions to change representation</li> <li>• commercial rents</li> <li>• pedestrian flows</li> <li>• accessibility</li> <li>• perception of safety and occurrence of crime</li> <li>• state of town centre environmental quality</li> </ul> <p>Not all successful town centre regeneration projects have been retail led or</p>	<p>Within the town centre profiles the Council has used the health check criteria set out in national guidance with the addition of a criterion relating to public health. However the Council does not have access to all data sets.</p>

<p>involved significant new development. Improvements to the public realm, transport (including parking) and accessibility as well as other measures promoted through partnership can also play important roles.</p> <p>Any strategy should identify relevant sites, actions and timescales, and be articulated clearly in the Local Plan, where it can be considered by local people and investors. It should be regularly reviewed, assessing the changing role and function of different parts of the town centre over time.</p>	
<p><b>6. What if the required development cannot be accommodated in the town centre?</b>  Paragraph: 006 Reference ID: 2b-006-20140306 - Revision date: 06 03 2014</p> <p>It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise, as set out in <a href="#">paragraph 26 of the National Planning Policy Framework</a>.</p> <p><b>Related policy</b> - National Planning Policy Framework - Paragraph 26</p>	<p>The PSP Plan process has sought to identify opportunities in and around Town centres and primary retail areas and Policy PSP 32 sets out how the sequential test will be applied when considering development of main town centre uses. In essence retail uses will be directed in the first instance to primary shopping areas and other main town centres will be accommodated more generally within town centres where there are development and redevelopment opportunities. If sites suitable cannot be identified in these locations a sequential approach will be followed.</p>
<p><b>7. What should local planning authorities consider when planning for tourism?</b>  Paragraph: 007 Reference ID: 2b-007-20140306 - Revision date: 06 03 2014</p> <p>Please see here for the World Tourism Organisation’s <a href="#">definition of tourism</a>.</p> <p>Tourism is extremely diverse and covers all activities of visitors. Local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism. When planning for tourism, local planning authorities should:</p>	<p>Although the District has a number of sites of tourist interest and facilities to support both general and business tourism there is likely to be further</p>

<ul style="list-style-type: none"> <li>• consider the specific needs of the tourist industry, including particular locational or operational requirements;</li> <li>• engage with representatives of the tourism industry;</li> <li>• examine the broader social, economic, and environmental impacts of tourism;</li> <li>• analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and</li> <li>• have regard to non-planning guidance produced by other Government Departments.</li> </ul> <p>Local planning authorities may also want to consider guidance and best practice produced by the tourism sector. Further guidance on tourism can be found on the <a href="#">Visit England website</a>.</p>	<p>potential for some centres such as Thornbury and Chipping Sodbury to benefit from visitors.</p>
<p><b>8. What is the sequential test?</b> Paragraph: 008 Reference ID: 2b-008-20140306 - Revision date: 06 03 2014</p> <p>The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected to the town centre. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.</p> <p><b>Related policy</b> - National Planning Policy Framework - Annex 2 – Glossary - Edge of Centre</p>	<p>The Council through policy CS14 and PSP 32 supports application of the sequential test.</p>
<p><b>9. How should the sequential approach be used in plan-making?</b> Paragraph: 009 Reference ID: 2b-009-20140306 - Revision date: 06 03 2014</p> <p>In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate</p>	<p>The PSP has identified sites to meet needs either within or adjacent to primary shopping areas.</p>

<p>main town centre uses are rejected.</p> <p>The checklist below sets out the matters that should be considered when taking a sequential approach to plan-making:</p> <ul style="list-style-type: none"> <li>• Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses</li> <li>• Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed</li> <li>• If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on?</li> </ul> <p>Local Plans should contain policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan.</p>	<p>The Council is confident that retail needs identified for the period to 2021 can be met within town centres as indicated in PSP 32. Beyond that period there will be need to review both the quantum of growth required and the opportunities available to meet identified needs. That review should be complete by 2018 as part of an updated local plan to ensure that the position beyond 2021 is fully addressed in a plan led system.</p>
<p><b>10. How should the sequential test be used in decision-taking?</b></p> <p>Paragraph: 010 Reference ID: 2b-010-20140306 - Revision date: 06 03 2014</p> <p>It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority should support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test should be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites should be discussed between the developer and local planning authority at the earliest opportunity.</p> <p>The checklist below sets out the considerations that should be taken into</p>	<p>While this clause relates primarily to the development management process policies CS14 and PSP 32 make clear that a sequential approach is required in line with national policy.</p>

<p>account in determining whether a proposal complies with the sequential test:</p> <ul style="list-style-type: none"> <li>• with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.</li> <li>• is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.</li> <li>• if there are no suitable sequentially preferable locations, the sequential test is passed.</li> </ul> <p>In line with <a href="#">paragraph 27 of the National Planning Policy Framework</a>, where a proposal fails to satisfy the sequential test, it should be refused. Compliance with the sequential and impact tests does not guarantee that permission is granted – local planning authorities will have to consider all material considerations in reaching a decision.</p> <p><b>Related policy</b> - National Planning Policy Framework - <a href="#">Paragraph 27</a></p>	
<p><b>11. How should locational requirements be considered in the sequential test?</b>  Paragraph: 011 Reference ID: 2b-011-20140306 Revision date: 06 03 2014</p> <p>Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification.</p>	<p>Noted – for consideration through the development management process.</p>

<p><b>12. How should viability be promoted?</b>  Paragraph: 012 Reference ID: 2b-012-20140306 Revision date: 06 03 2014</p> <p>The sequential test seeks to deliver the Government’s “town centre first” policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere local planning authorities need to be realistic and flexible in terms of their expectations.</p>	<p>Noted – for consideration through the development management process</p>
<p><b>13. What is the impact test?</b>  Paragraph: 013 Reference ID: 2b-013-20140306 Revision date: 06 03 2014</p> <p>The purpose of the test is to ensure that the impact over time (up to five years (ten for major schemes)) of certain out of centre and edge of centre proposals on existing town centres is not significantly adverse. The test relates to retail, office and leisure development (not all main town centre uses) which are not in accordance with an up to date Local Plan and outside of existing town centres. It is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas.</p>	<p>Noted – for consideration through the development management process</p>
<p><b>14. How should the impact test be used in plan-making?</b>  (Paragraph: 014 Reference ID: 2b-014-20140306 Revision date: 06 03 2014)</p> <p>If the Local Plan is based on meeting the assessed need for town centre uses in accordance with the sequential approach, issues of adverse impact should not arise. The impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centres.</p>	<p>The issue can arise in plan making where an allocation of growth to one centre might result in a lack of growth or the distraction of expenditure from a centre nearby. The approach in PSP 32 to identify potential areas for expansion of primary shopping areas, but requiring them to be subject of sequential and impact tests, should help to ensure that the scale of any proposals is not such that its potential to impact on a neighbouring centre is overlooked.</p>
<p><b>15. How should the impact test be used in decision-taking?</b>  (Paragraph: 015 Reference ID: 2b-015-20140306 Revision date: 06 03 2014)</p> <p>It is for the applicant to demonstrate compliance with the impact test in support of relevant applications. Failure to undertake an impact test could in</p>	<p>The impact test undertaken should genuinely look at the potential to impact on other town centres through trade and investment deflection –</p>

<p>itself constitute a reason for refusing permission.</p> <p>The impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Ideally, applicants and local planning authorities should seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted.</p>	<p>not simply assert that there is adequate potential expenditure within the catchment area to support the existing and proposed floorspace.</p>
<p><b>16. When should the impact test be used?</b>  Paragraph: 016 Reference ID: 2b-016-20140306 Revision date: 06 03 2014</p> <p>The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace* unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the:</p> <ul style="list-style-type: none"> <li>• scale of proposals relative to town centres</li> <li>• the existing viability and vitality of town centres</li> <li>• cumulative effects of recent developments</li> <li>• whether local town centres are vulnerable</li> <li>• likely effects of development on any town centre strategy</li> <li>• impact on any other planned investment</li> </ul> <p>As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities. Conditions may be attached to appropriately control the impact of a <a href="#">particular use</a>.</p> <p>Where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment. Key considerations will include:</p>	<p>CS14 does provide a local floorspace threshold for impact assessments primarily to overcome the potential cumulative impact of multiple schemes each just below the national figure.</p>

<ul style="list-style-type: none"> <li>• the policy status of the investment (i.e. whether it is outlined in the Development Plan)</li> <li>• the progress made towards securing the investment (for example if contracts are established)</li> <li>• the extent to which an application is likely to undermine planned developments or investments based on the effects on current/ forecast turnovers, operator demand and investor confidence</li> </ul> <p>* <i>Gross retail floorspace</i> (or gross external area) is the total built floor area measured externally which is occupied exclusively by a retailer or retailers, excluding open areas used for the storage, display or sale of goods.</p>	
<p><b>17. Is there a checklist for applying the impact test?</b>  Paragraph: 017 Reference ID: 2b-017-20140306 Revision date: 06 03 2014</p> <p>The following steps should be taken in <a href="#">applying the impact test</a></p> <ul style="list-style-type: none"> <li>• establish the state of existing centres and the nature of current shopping patterns (base year)</li> <li>• determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur</li> <li>• examine the ‘no development’ scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);</li> <li>• assess the proposal’s turnover and trade draw* (drawing on information from comparable schemes, the operator’s benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw)</li> <li>• consider a range of plausible scenarios in assessing the impact of the</li> </ul>	<p>Noted – for consideration through the development management process</p>

proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact)

- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres

A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. For example in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.

Where evidence shows that there would be no likely significant impact on a town centre from an edge of centre or out of centre proposal, the local planning authority must then consider all other material considerations in determining the application, as it would for any other development.

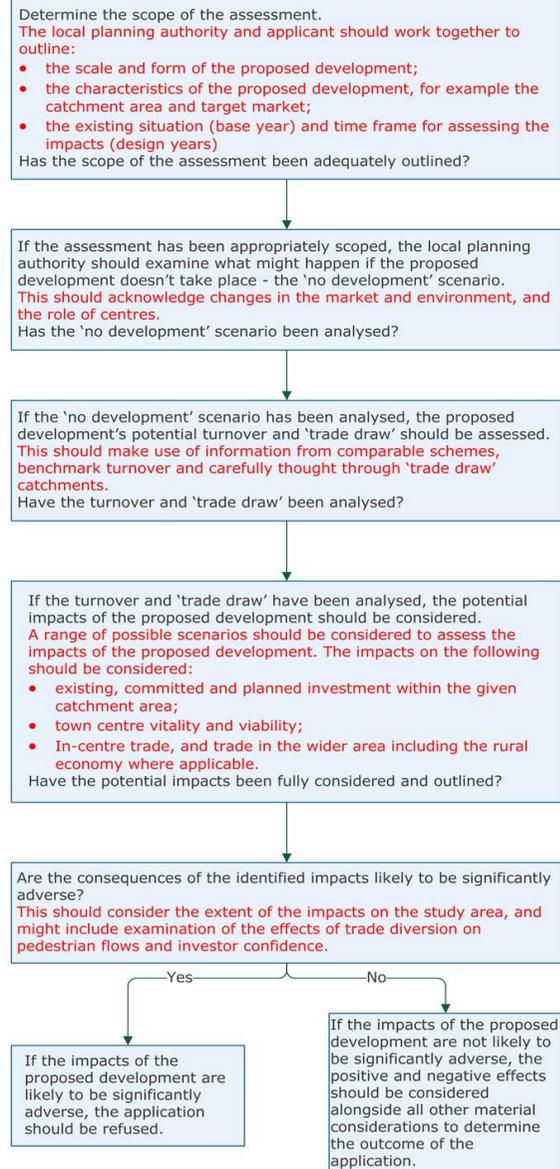
The design year for impact testing should be selected to represent the year when the proposal has achieved a 'mature' trading pattern. This is conventionally taken as the second full calendar year of trading after opening of each phase of a new retail development, but it may take longer for some developments to become established.

*\*Trade draw* is the proportion of trade that a development is likely to receive from customers within and outside its catchment area. It is likely that trade draw will relate to a certain geographic area (i.e. the distance people are likely to travel) and for a particular market segment (e.g. convenience retail). The best way of assessing trade draw where new development is proposed is to look at existing proxies of that type of development in other areas.

## 18. Impact Test: Decision-taking

(Paragraph: 018 Reference ID: 2b-018-20140306 Revision date: 06 03 2014)

This diagram (below) sets out some of the key steps which should be taken when carrying out an impact test in decision-taking, but does not outline the process in its entirety.



## Appendix 4.

### South Gloucestershire Local Plan DPD Town Centres and Retailing Notes of briefings held 14<sup>th</sup> November 2013 at Chipping Sodbury Town Hall

Notes: Briefing sessions were held at Chipping Sodbury Town Hall on 14<sup>th</sup> November 2013 at 3.00 and 6.30. The invited guests included Ward Members, Parish Council's, business and community organisations, major town centre landowners and planning agents. The afternoon session was much better attended than the evening session.

The session were designed to introduce the work undertaken to date for town centres in preparation of the Policies, Sites and Places Plan and to explain arrangement for initial consultation. The profiles were subsequently published to the Web.

Mike Luton introduced the briefing sessions and outlined the Context set by the emerging Core Strategy including the commitment to a 'town centres first approach' to policy and also to the identified need to accommodate around 34,000 sq. m. of comparison floorspace across the District. He explained that a draft profile had been prepared for each centre which drew from research, ongoing monitoring, previous health checks and known issues. The aim was for the profiles to be updated following consultation and then to form part of the evidence base for the Policies Sites and Places Plan.

#### Questions and comments.

*Cllr Malcolm Watson*

The consultation period has been unrealistic. Reminded SGC of the commitment (via Compact) to allow longer consultation.

*Cllr. Dave Hockey*

Frampton Cotterell have had three meetings to discuss sustainability appraisals and would like to know when that will be discussed. DH will pick up SA in every major planning application.

*Cllr Paul Hulbert*

Do need to move forward with policies as we're under significant pressure from developers wishing to "jump the gun". Need to do this right but in swift timescales. Asked for definition of "primary" v "secondary" retail frontage.

*ML clarified that primary is continuous retail frontage and secondary is where retail is punctuated by cafes, banks, social uses.*

*Cllr. Sue Hope*

Raised the National WI motion regarding shopping locally and that there is a changing face of retail. Queries whether these have been built into the model that suggests 34,000sqm of comparison floorspace.

*ML clarified that account has been taken of special forms of trading (internet shopping etc).*

*The scale of growth is broadly equivalent to one floor of the Mall. No evidence of need for new convenience retail floorspace.*

*Cllr. Ruth Davis*

When she first came to Yate there were two shops that sold white goods that are no longer there. Questioned whether the planning designation for the centre of town has changed.

*ML confirmed planning designation hasn't changed but that those changes have been market driven. Even with increase in internet shopping people still go to shops to compare goods then purchase online.*

*Genevieve Tuffnel (Alder King)*

With Chipping Sodbury there's an established community to engage with. What happens in the UWE / Coldharbour Lane area?

*ML – hoping someone will take the initiative in that area and others like it. Is there a local centre in that area? e.g. Fox Den Rd area – could it be remodelled or do Abbeywood and Cheswick Village have a role? Points to be explored.*

*Cllr. Dave Hockey*

In the CPNN there are local retail centres proposed. Are the developers proposals expected to fit in with the S. Glos vision for each of those local centres?

*ML: SGC has the list of requirements and is working with each developer to indicate how the centres might be shaped. Centres are expected to be well-integrated.*

*Cllr. Tony Davis*

Charlton Hayes seen as part of Patchway. Concern that the new neighbourhoods may not be seen as part of existing centres. Vision is one that straddles Highwood Road and will integrate the new with the existing communities.

*ML – officers are aware of the longstanding ambition and are aware that a group has formed in Patchway to try and take ideas forward. This illustrates how local partnership working can feed ideas into the profiles and ultimately to the Plan.*

*Scott Lahive – Centre Manager, Willow Brook Centre, Bradley Stoke*

Bradley Stoke centre is 100% let/occupied but the centre has requirements for additional services. Footprint for building is restricted but they want to expand looking at greater good of the town.

*ML response – it would be good if options for expansion can be investigated and conclusions feed in to the plan. Suggest discussion with Bradley Stoke Town Council.*

*Cllr Paul Hulbert*

Yate is an interesting example of when small commercial estates in the west serve a mix of retail and industrial uses. Can unmet needs in Yate be met outside the town centre? Old town centre was towards the west originally.

*ML response – the first stage is to identify any unmet needs, then to establish whether they can be met within the core retail areas. If not there may be scope to consider some development in edge of centre locations where there may be regeneration benefits – but other local impacts, including traffic, also need to be considered.*

*Cllr Pat Hockey*

Why was a decision taken to have a few neighbourhood centres in the north fringe rather than have a single large heart in the development for the whole community?

*ML: not too late to influence thinking for the Cribbs Patchway New Neighbourhood. A draft profile is included and response invited. Current thinking is that smaller neighbourhood centres plus one larger centre with community heart and secondary school will be developed. There may be a question over the range of shops that should or can be delivered there given proximity of The Mall.*

PH – we need to think of town centres as social centres rather than retail centres. Think of diversification.

*Cllr Paul Hulbert*

Is there something where provision for smaller neighbourhood centres can be picked up? Town vs Local? How can the older established centres be helped? Landlord inactivity is a problem; they may need a vision imposed on them.

*ML Town council works with SGC Economic Development Team - George Kousouros (GK). Andrew Lane in the policy team will also have an interest. However Policies, Sites and Places Plan does not need to have policy on every local centre – much can be achieved outside of the planning system.*

GK: retail LEP group bidding for regeneration money for town centres. The changing face of retail e.g. people can order online and collect locally; how can centres develop to facilitate this?

*Cllr Tony Davis*

Concern when Tesco opened in Yate. Tesco survey said when you build in a town centre it attracts business into the centre. Problem with Patchway is the existing large scale out-of-centre retailers. If you open supermarkets out of the centre they attract people, away from a town centre.

*ML: one of the options to be explored in Patchway is the introduction of at least one supermarket to help anchor the centre with modern retailing facilities. Site options may be limited.*

*Hayley Phipps*

Will someone be revising the retail study evidence base? The retail study was criticised by the inspector so perhaps there's a need to refresh it? How will this DPD deal with the Mall?

*ML: possibly – there are a number of considerations – a district wider or sub regional approach (with LEP), update strategic model or just local health checks. Policy is now set for the next few years so we need to work within that. Timing of further studies is therefore also relevant. A decision is likely once the profile work is progressed and the scale of opportunities in local centres is clearer.*

*ML: The Core Strategy does indicate that the Policies, Sites and Place Plan should address issues at Cribbs Causeway. A profile has been prepared. It is clear that any development of policy must be consistent with higher order policies and our duty to cooperate with neighbouring authorities. If local centres do not demonstrate capacity to accommodate growth it is likely that landowners at Cribbs Causeway will make the case for some development there.*

*Patrick Conroy: Confirmed - Longer term decisions on the future of The Mall sits with the Local Plan review. Local agenda about how we find 34,000sqm comparison floorspace. Will need to employ sequential tests.*

*Scott Lahive*

Will that decision be taken locally?

*PC: Inspector wasn't supportive of The Mall being designated as a town centre in this version of the plan. 34,000sq m of floorspace to be delivered by Town Centre first sequential approach.*

*Genevieve Tuffnell*

What is the evidence base for existing centre capacity?

*ML: floorspace figures from annual audit. Relying to an extent on local and community feedback to keep updated and identify any sites which are or may become available.*

## **Annex 1. Letter of invitation**

You may be aware that the Council has started work for the Policies, Sites and Places Development Plan Document (PSPDPD). This new plan will be provide policies and proposals in greater detail than the Core Strategy and will also supersede the remaining policies of the South Gloucestershire Local Plan which was adopted in 2006.

More detail can be found at: <http://www.southglos.gov.uk/Pages/Topic%20Pages/Planning%20Transport%20-%20Strategic%20Environment/Planning%20Environment/Policies,-sites-and-places-DPD-12024.aspx>

Amongst tasks for the plan it will need to define town centre boundaries, allocate sites for new comparison floorspace (non-food shopping) in line with Core Strategy Policy CS14 and also review the list of primary and secondary shopping frontages set out in the Local Plan of 2006.

While retailing is important to our town centres they should all be mixed-use and meet a range of community and service needs. The plan may therefore also consider any wider site needs arising in local centres for example for community meeting spaces.

This work needs to be based on sound evidence and a detailed understanding of issues within each of the District's town centres. This is an opportunity to feed ideas into the statutory planning process.

While some centres already have partnerships and published strategies others do not. A more consistent approach would be helpful and Officers have started the process of pulling together 'profiles' for each centre which review the current mix of land-uses, consider town centre health check issues and suggest potential policy areas as a basis for discussion. These seek to draw on existing strategies where available. We will welcome local input to these profiles.

To help with this two briefing sessions have been arranged both on **14<sup>th</sup> November at Chipping Sodbury Town Hall**. The first session will run from 3.00 to 4.30 and the repeat session will be from 6.30 to 8.00 p.m. You are welcome to attend.

The sessions will explain in more detail how the profiles are being prepared and how you can input to them. They are intended for a mixed audience of district and parish councillors, local community and business partnerships, service providers, landowners, developers and of course town centre strategy groups.

Our data base of contacts is not comprehensive and therefore please feel free to forward this invite to others who you think may be interested.

It would however help to have an indication of numbers attending so please complete the reply slip below and reply to this email.

Kind regards

## **Annex 2 – Letter (email) inviting feedback**

Following our email of 31<sup>st</sup> October and the briefing sessions held on 14<sup>th</sup> November please be advised that a covering report and the draft profiles prepared for each of our main town centre and retail areas in South Gloucestershire are now available to view via the following link:

<http://www.southglos.gov.uk/Pages/Article%20Pages/Planning%20Transport%20-%20Strategic%20Environment/Planning%20policy/Town-centres-engagement-12159.aspx>

We would welcome any feedback on the draft profiles. Where possible it would help to have a combined response from all the key interests/organisations in a centre. That would not only make the task of updating the profiles easier but also help to present a more unified vision of its future.

We appreciate that not everyone was able to attend the briefing sessions and that there has been some confusion between various questionnaires and emails. We are trying to coordinate a number of separate but related work items all of which will feed into future planning policy and we apologise for any confusion caused.

Most town and parish councils have already responded to an earlier questionnaire for the Policies, Sites and Places Plan which ran from 9<sup>th</sup> September to 14<sup>th</sup> November. This new consultation for the town centres and other retail areas is going wider to invite feedback from key landowners, organisations, partnerships and other stakeholders with an interest in our town centres. There will also be a wider 'call for sites' shortly which will invite more detailed information on potential development sites across the District.

We are working through the comments made by town and parish councils in response to the earlier questionnaires and have included general points made about individual town centres within the draft profiles. We are continuing to work through the questionnaires and will add any further points to the profiles in due course.

The profiles will be updated and kept under review over the next few months and we would be grateful for your input. Discussion points are given at the end of each profile but as a minimum we would hope to receive an early indication of:

- Any gaps or major inaccuracies in information which you can help to correct and which would assist us to provide a more complete evidence base for each centre
- Any evidence you may have of unmet needs – e.g. for retail, service and community uses.
- Any potential development sites – at this stage we are keen that potential sites within town centres are simply 'flagged-up' so that we can then follow up with more detailed information and analysis through the 'Call for Sites'.
- Issues with the suggested policy area boundaries i.e. the suggested
  - a. Town Centre boundaries
  - b. Core retail area boundaries
  - c. Primary and secondary shopping frontages.

It would help to have responses by 31<sup>st</sup> December but we appreciate that this is a busy time of year and later feedback will still be welcomed and taken on board as we refresh profiles and pick up on issues raised in the New Year. Please contact us via the Planning LDF email address ([PlanningLDF@southglos.gov.uk](mailto:PlanningLDF@southglos.gov.uk)) if you would like to provide any feedback on the profiles or discuss any points.

Kind regards

## Appendix 5 – POLICY CS14 - TOWN CENTRES AND RETAIL

The Council will work with partner organisations and the local community to protect and enhance the vitality and viability of existing centres in South Gloucestershire in recognition of their retail, service and social functions:	
<b>Centres</b>	<b>Role &amp; Function</b>
<b>Town Centres</b>	
Bradley Stoke	Town Centre
Emersons Green	Town centre. Opportunity for expansion to serve new housing
Kingswood	Larger High Street shopping and service centre
Thornbury	Market town
Yate (including Station Road)	Market town
Chipping Sodbury	Market town
Downend	High Street shopping and service centre
Filton	Convenience shopping and service centre
Hanham	High Street shopping and service centre
Staple Hill	High Street shopping and service centre
<b>District Centres</b>	
Patchway (new)	New centre to be developed by extending the existing local centre on Rodway Road to support Charlton Hayes development.
Sainsbury's/B&Q, Stoke Gifford (new)	New centre to be investigated to serve the Stoke Gifford, Harry Stoke, UWE and Cheswick village area
<b>Local Centres &amp; Parades</b>	
49 Centres/Parades (listed in Table. 3)	Provide local level services
<b>Out-of-Centre</b>	
Cribbs Causeway/Mall, Abbey Wood and Longwell Green Retail Parks	Cribbs Causeway/Mall, Abbey Wood and Longwell Green Retail Parks will be treated as out-of-centre and development proposals will need to satisfy the sequential test. The future role of Abbey Wood Retail Park is addressed under Policy CS25.
<p>New investment in main town centre uses consistent with the NPPF will be directed into the town and district centres, reflecting the scale and function of the centre including making provision for 34,000 sq.m. net of new comparison floorspace by 2026 to meet the needs of the communities in South Gloucestershire. The distribution of this floorspace will be through the Policies, Sites and Places Development Plan Document or a replacement Core Strategy/Local Plan.</p> <p>Development in local centres/parades will be primarily to meet local needs only and of a scale appropriate to the role and function of the centre/parade and where it would not harm the vitality and viability of other</p>	

centres.

This will be achieved by:

- Identifying in the Policies, Sites and Places Development Plan Document or a replacement Local Plan/Core Strategy centre boundaries, primary shopping areas, shopping frontages, and development opportunities in accessible locations within and on the edge of centres;
- Encouraging retail, commercial, leisure and cultural development within a centre of an appropriate type and scale commensurate with its current or future function;
- Safeguarding the retail character and function of centres by resisting developments that detract from their vitality and viability and protecting against the loss of retail units;
- Applying the sequential approach when considering proposals for new town centre uses;
- Requiring impact assessments for edge-of-centre and out-of-centre proposals with a floorspace over 1,000 sq.m. gross;
- Encouraging convenient and accessible local shopping facilities to meet the day to day needs of residents and contribute to social inclusion.

Shops and services, both in urban and rural areas, are also safeguarded from loss under Policy CS13 and policies in the NPPF.

## Appendix 6 – The Portas Review December 2011

### An independent review into the future of our high streets

#### Summary of Recommendations

1. Put in place a “Town Team”: a visionary, strategic and strong operational management team for high streets
2. Empower successful Business Improvement Districts to take on more responsibilities and powers and become “Super-BIDs”
3. Legislate to allow landlords to become high street investors by contributing to their Business Improvement District
4. Establish a new “National Market Day” where budding shopkeepers can try their hand at operating a low-cost retail business
5. Make it easier for people to become market traders by removing unnecessary regulations so that anyone can trade on the high street unless there is a valid reason why not
6. Government should consider whether business rates can better support small businesses and independent retailers
7. Local authorities should use their new discretionary powers to give business rate concessions to new local businesses
8. Make business rates work for business by reviewing the use of the RPI with a view to changing the calculation to CPI
9. Local areas should implement free controlled parking schemes that work for their town centres and we should have a new parking league table
10. Town Teams should focus on making high streets accessible, attractive and safe
11. Government should include high street deregulation as part of their ongoing work on freeing up red tape
12. Address the restrictive aspects of the ‘Use Class’ system to make it easier to change the uses of key properties on the high street
13. Put betting shops into a separate ‘Use Class’ of their own
14. Make explicit a presumption in favour of town centre development in the wording of the National Planning Policy Framework
15. Introduce Secretary of State “exceptional sign off” for all new out-of-town developments and require all large new developments to have an “affordable shops” quota
16. Large retailers should support and mentor local businesses and independent retailers
17. Retailers should report on their support of local high streets in their annual report
18. Encourage a contract of care between landlords and their commercial tenants by promoting the leasing code and supporting the use of lease structures other than upward only rent reviews, especially for small businesses
19. Explore further disincentives to prevent landlords from leaving units vacant
20. Banks who own empty property on the high street should either administer these assets well or be required to sell them
21. Local authorities should make more proactive use of Compulsory Purchase Order powers to encourage the redevelopment of key high street retail space

22. Empower local authorities to step in when landlords are negligent with new “Empty Shop Management Orders”
23. Introduce a public register of high street landlords
24. Run a high profile campaign to get people involved in Neighbourhood Plans
25. Promote the inclusion of the High Street in Neighbourhood Plans
26. Developers should make a financial contribution to ensure that the local community has a strong voice in the planning system
27. Support imaginative community use of empty properties through Community Right to Buy, Meanwhile Use and a new “Community Right to Try”
28. Run a number of High Street Pilots to test proof of concept

## Appendix 7 - The Grimsey Review Report – September 2013

### Conclusions

1. Town centre/high street plans must encompass a complete community hub solution incorporating; health, housing, education, arts, entertainment, business space, manufacturing and leisure, whilst developing day time, evening time and night time cultures where shops are just a part of the total plan.
2. A number of radical government actions are required in order to create a level playing field which will provide conditions for town centres to facilitate change, encourage local investment, cutting through red tape and providing a common set of measures to track performance.
3. A methodology and timetable is required to enable all local authorities to produce a town centre business plan complete with timelines, capital and revenue costs and benefits. The output for each town centre will be different identifying their own individual selling proposition and vision based on their unique heritage.

### Recommendations:

#### Making the transition

1. Accept that there is already too much retail space in the UK and that bricks and mortar retailing can no longer be the anchor to create thriving high streets and town centres.
2. Set an objective to repopulate high streets and town centres as community hubs encompassing: more housing, education, arts, entertainment, business space, health and leisure – and some shops.
3. Establish a Town Centre Commission for each town with a defined skill base and structure to build a 20-year vision for each town supported by a broad business plan in five-year chunks.
4. Require local authorities to hold a public meeting annually to present the 20-year vision, town centre plans and progress made in the year, supported by an annual progress report.
5. Prepare for a 'wired town' vision or 'networked high streets' that puts libraries and other public spaces at the centre of each community based on the technology that exists today and will develop in the future.
6. Establish a 'Digital Maturity Demographic Profile for each town to prepare for 'networked high streets' and tailor connection and communication strategies accordingly.

#### Creating a fairer, more economically sustainable high street

7. Reintroduce immediately the 2015 business rates revaluation to realign property values and freeze business rates from 2014.
8. Once revaluations have taken place any future increases should be an annualised CPI rate rather than a one-month snapshot.
9. From 2017 revaluations must be conducted annually.
10. Any business occupying a retail property in the retail core of a town centre that has been vacant for 12 months should receive 50% rate relief for two years.
11. There must be a political will and determination to reduce property taxation once the Government's fiscal debt consolidation plans have been fully implemented.
12. The business rates system needs a root and branch review to establish a flexible system that

will reflect changes in economic conditions as they occur.

13. Local authorities to use a portion of their reserves to offer loans to qualifying small businesses.
14. Understand the success of the Bank of Dave set up and establish a process, including local crowdfunding, for local people to collectively invest in the local community and start up businesses.
15. Connect planning applications to the business plan for each town and ensure that developments fit within the criteria set.
16. Enable the change of use process to be used to convert entire sub-high streets to residential or other uses within the agreed high street plan and relocate the successful independent retailers into the main commercial centre.
17. Make it easier for motorists to shop by building in a two hour free high street and town centre car parking system to the overall business plan for the location.
18. Local authorities to freeze car-parking charges for a minimum of 12 months.

#### **Community first**

19. Reduce mandatory rate relief for charities from 80 per cent to 70 per cent and of the remaining 30 per cent payable in business rates apportion a third to a ring fenced local authority pot for projects that benefit the community.
20. Establish greater clarity on the mandatory rate relief criteria for charities, social enterprises and Community Interest Companies. Organisations whose primary function is to exist for the benefit of the local community - i.e. hospice shops – should be given priority status for top up relief from local authorities.
21. Landlords of empty shop units should be required to apply for a change of use and make the asset productive in the community as housing, health, leisure, culture or education facilities in line with the town plan.
22. Make it compulsory for all Mega Mall developments to create a percentage of affordable space within the development for local traders and market stall pitches.
23. Evaluate the future of out of town shopping parks and prepare a plan to bring unwanted space back into use to benefit the community.
24. The Community Infrastructure Levy should be used to support the delivery of a town centre plan.

#### **Better-managed high streets**

25. Put in place common key performance indicators to measure the economic health of each town and link the reporting through a data dashboard to provide independent, objective and current data on performance.
26. Create a full time high streets minister to replace the current part time position that is tagged on to the duties of housing minister. Encourage greater cross-departmental work between BIS and DCLG to fully understand shared government responsibilities for helping improve local high streets.
27. Establish a comprehensive evidence base that tracks the change in retail and leisure locations from a local, regional and national perspective. Actively encourage and fund research based on this data by academic institutions in partnership with the private sector in order to ensure ongoing thought leadership into the nature and reasons behind changes taking place.
28. Ensure that the economic blueprints produced by Town Commissions are sustainable and

environmentally practical by understanding and emulating innovation from the Transition Town trials, for example.

29. Make it compulsory for national retail and leisure chains to invest 0.25% of one year's sales (2014) into a local economic development fund to sponsor local start-up businesses in a similar way to the Prince's Trust. This would be a one-off levy.
30. Implement the Town Centre Commission process through five trials to test the methodology, information requirements, modelling techniques and viability of the whole process including public consultation.
31. A timetable should be set to conduct the trials by March 2014 and aim to exit 2014 with plans, measures and central technology in place for all town centres for implementation from 2015 onwards.

## Appendix 8 Future High Streets Forum

### Good leadership: Great High Streets – May 2014

#### Executive Summary

Task and Finish Group One has a broad membership drawn from the parties represented on the Future High Streets Forum, including retailers, industry bodies, local government and subject experts. The Group has a remit to review and understand leadership on the High Street using the existing Portas Pilot Towns, and the Group Terms of Reference reflect this.

After four study visits to Portas Pilot Towns, the Group gathered information on planning; strategies and tactics that have worked well; activities which have not worked, availability of funding streams; and the make-up of the wider Town Team Partners. This had led us to recommend a model for good leadership and local visioning that contains appropriate steps to establish strong partnerships, with a focus on local delivery. This model could be promoted as a template for Town Teams and beyond to follow, with the understanding that this is a framework still requiring strong leadership at the local level to be truly successful and sustainable.

The key elements of the model are:

#### 1. Establish a local partnership to drive change

- Establishing a Town Baseline as a snapshot of current standards and performance
- Develop a shared vision for the town (drawing on a unique sense of place)

#### 2. Develop a Town Strategy and associated Action Plan with defined benefits for the Town and clear timetables for delivery

- The local partnership should aim to work closely with the local authority to help shape a Local Plan

#### 3. Local groups deliver the Action Plan, reporting to the leadership of the local partnership

- Sustainable funding and appropriate resource is required for this to be effective

#### 4. Conduct a regular and systematic review of the Action Plan and Town Strategy

#### 5. Draw insights from the above review; celebrate successes with an effective communication plan

- Use insights to challenge and renew the original vision and Town Strategy

By implementing the model above, local centres of all scales can benefit from a semi-structured yet nationally coherent approach to develop strong partnerships, with clear, informed decision making processes delivering schemes for the community, by the community.

#### Recommendations

This report and these recommendations seek to build upon the great work done following the publication of the Portas Review and the subsequent identification and successes of the Portas Pilot Towns. From an extensive review of the original pilots, it is clear there are common factors for success in each of the towns and common areas that have been problematic; adoption of these recommendations will support the delivery of more successful towns and High Streets in the UK.

- The 'Plan-Do-Review Model for Town Centres' on page nine is an excellent starting point for leadership of High Streets, town and city centres across the UK, and should be used as the structure for current and future partnership models

We recommend that the 'Plan-Do-Review Model for Town Centres' be recognised as best practice for managing town centres in the UK. Drawing on the experiences of Portas Pilots and Town Teams

across England, Task & Finish Group One has determined that the presence of a structure (be it a BID, local partnership, town centre management group or Town Team) is a key community asset in bringing local businesses, communities and public sector representatives together to help develop a common vision for the future projects that support that vision. The model sets clear steps for any location to follow.

- We recommend that stakeholders be invited to agree to support the ongoing adoption of the 'Plan-Do-Review Model for Town Centres' through a culture of proactive engagement at the local level

The 'Plan-Do-Review Model for Town Centres' has been adopted by several Portas Pilots and Town Teams, and the Association of Town & City Management (ATCM) are currently supporting remaining locations to use the concepts within the model in their own areas. Business in The Community (BiTC) are supporting high streets through their business network and the Healthy High Street Campaign, designed to roll out a package of support for 100 locations to help reduce vacancy rates, increase footfall and create jobs.

It is the recommendation of Task & Finish Group One that members of the Future High Streets Forum, in their capacity as town centre stakeholders, be encouraged to offer further support to aid the development of local partnerships. This could be by releasing local staff to work with groups, or in the case of the Local Government Association, helping to ensure public and private sectors join together effectively. ATCM and BiTC are well-placed to help match local groups with support from partners both inside and beyond the Future High Streets Forum.

- We recommend that an online resource is set up to provide high quality current information on how to help High Streets and town centres, support sharing best practice and provide an interactive forum on what makes great High Streets and town centres

Work is now underway to develop this important tool primarily using resource from the ATCM, supported by Department for Communities and Local Government and the online resource should be available towards the middle of 2014.

## **Appendix 9 – Extracts from South Gloucestershire Retail capacity Study – DPDS June 2014**

### **1.0 Introduction**

1.2 The purpose of this study was to check that the assumptions made about the capacity of each centre to accommodate growth are reasonable at this stage of the plan making process and as a basis for public consultation on the draft policies.

1.3 The Study has therefore sought information on two fundamental questions in relation to the figures suggested in policy PSP32 –

- i) Is there physical capacity to accommodate further retail development?
- ii) Is there retailer demand to support development on the scale proposed?

### **3.0 Conclusions**

3.1 The Core Strategy requires the provision of 34,000sq m of additional comparison goods floorspace to meet the District's needs up to 2026/27 in accordance with the retail hierarchy as set at Policy CS14. The Council has proposed that 17,000sq m of comparison floor space is allocated to the defined centres (proposed distribution shown at Appendix 1) in the Policies Sites and Place Plan (PSP) with the remainder identified as a residual to come forward in accord with retail policy.

3.2 The two centres where we do have some concerns, are the proposed Stoke Gifford centre, and Emersons Green. From speaking with agents involved in both schemes it is clear that there is a desire to bring forward both proposals, and it is likely that whether or not the proposals come forward much will depend on the interpretation of the Councils development control policies. In relation to Emersons Green, while there is physical capacity in the centre and retail demand in the area generally, any comparison goods floorspace provision to the east of the A4174 would in practice act as a freestanding development and the Council will have to consider this in the context of the wider retail policies in due course. At Stoke Gifford discussions between the parties appears to be at a relatively early stage, and that practical issues of how to better link the retail areas needs to be addressed.

3.3 Proposals by the Council have been assessed, and it is our view that there is physical capacity to accommodate further retail development broadly as set out, and from speaking with interested parties and local agents, demand to support development of the scale proposed. Further development over and above that specified in the policy may come forward as the centres as a whole have relatively healthy markets. However, this development (in addition to that taken account of) is likely to be opportunistic and therefore it is difficult to predict with any certainty scale or location. Such development would not be contrary to policy provided it is within the centres.

3.4 We therefore conclude that draft policy PSP28 (now32) offers a reasonable and practical distribution for the additional comparison goods floorspace.