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Date: 22 September 2011
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Dear Ms Diggle,

CORE STRATEGY – ADDITIONAL EVIDENCE BASE ON RETAIL AND TOWN CENTRE MATTERS

Further to my recent telephone conversation with James Fennell, I am writing to set out the Council's position on your clients' objections to the Core Strategy in respect of The Mall Regional Shopping Centre, now that we have had the opportunity to review and consider the reports that have been prepared by yourselves and RTP/Hollissvincent. Please accept my apologies for the delay in responding to you on this matter.

By way of context, Policy CS14 was drafted in line with the emerging regional policy at the time, which was that the strategic extension of the major shopping area at Cribbs Causeway would not be supported, although redevelopment within the Cribbs Causeway retail area to meet local needs was endorsed. Consequently, the scope of the RTP Town Centre and Retail Study, which provides the evidence base for the Core Strategy, was to look at further floorspace growth in the context of local needs only (i.e. South Gloucestershire). The Council, therefore, acknowledges that the Core Strategy has not addressed further floorspace growth at The Mall to serve its whole catchment area. In recognition of this, we sought to work with NLP to better understand this situation. In doing so both parties accept that The Mall operates on a catchment beyond South Gloucestershire and that, therefore, a distinction can be drawn between floorspace to serve local needs and floorspace to serve regional/sub-regional needs.

Policies CS14 and CS26 recognise the aspiration to move towards designating a town centre at Cribbs Causeway to serve the Cribbs/Patchway New Neighbourhood. Policy CS14 was drafted on the basis that such a designation would require a clear development strategy involving mixed use development, improved public transport and other measures before further floorspace became operational. As a consequence, until the development strategy for remodelling the Cribbs Causeway area is agreed, the Submission Core Strategy allows only for a modest amount of new retail floorspace at The Mall, with a restrictive approach being taken to further development at the Cribbs Causeway Retail Park.

In our view, given this context, there are three separate issues which lie at the heart of resolving your clients' objections:

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- 1) further growth of The Mall as a regional shopping centre;
- 2) the aspiration for a town centre at Cribbs Causeway; and
- 3) the distribution of the comparison floorspace identified in the Town Centre and Retail Study.

1) The Mall as a regional shopping centre

Now that work has halted on the Regional Spatial Strategy (RS) following the Localism Bill, there is a policy vacuum on regional shopping centres, a matter beyond the control of South Gloucestershire Council. The question is how the Core Strategy should address this vacuum. In the Council's opinion abandonment of the RS process does not waive the need for a regional or sub-regional perspective for proposals which previously needed one. Indeed, given the forthcoming abolition of regional spatial strategies, the Localism Bill is introducing a new 'Duty to Co-operate' on local planning authorities to work together to tackle strategic planning matters. This Duty is also highlighted in the Draft National Planning Policy Framework (paras 44-47), which is being introduced by the Government to replace current national planning guidance, particularly where these issues relate to the identified strategic priorities in the Framework, including providing for retail development. Compliance with this Duty to Co-operate is also being introduced as a crucial test of the soundness of a plan at Examination.

The Draft Framework also specifically states that planning policies should assess the impact of retail proposals on existing, committed and planned public and private investment in centres in the catchment area of a proposal (para 80). From NLP's own evidence the catchment area for The Mall extends across much of the West of England, as well as into Gloucestershire and Monmouthshire.

The RTP Town Centre and Retail Study suggests that 20,000 sq.m. net of new comparison floorspace should go to the Cribbs Causeway area to meet local needs. We assume that this would be provided within a new designated town centre, the boundaries of which are yet to be defined. The town centre may form an extension to The Mall, but could also be met in other ways. The design process we have initiated for the Cribbs/Patchway New Neighbourhood is intended to investigate and resolve opportunities for the location of this town centre.

There is a separate issue over growth of floorspace at The Mall to meet regional/sub-regional needs. That growth is in higher order comparison goods and the issue is whether that can or should be accommodated at The Mall, or met in other higher order centres, and whether there are other impacts (such as traffic) which need to be addressed. It is in respect of this wider sub-regional growth that we will be seeking further advice and liaising with neighbouring planning authorities in line with the Duty to Cooperate.

The Council does not have an issue about exploring the potential for future growth of The Mall Regional Shopping Centre. However, it is not in a position to support further floorspace growth at The Mall beyond local needs in the absence of an assessment on existing centres in The Mall's catchment area, including the higher order centres of Bristol and Bath City Centres and Weston super Mare and Chepstow Town Centres. This remains the position, irrespective of whether The Mall is included within the new town centre to serve the Cribbs/Patchway New Neighbourhood.

2) The aspiration for a town centre at Cribbs Causeway

In order to serve the new community to be created by the Cribbs/Patchway New Neighbourhood, the Core Strategy recognises a longer term ambition to create a town centre at Cribbs Causeway. The location of this town centre is to be defined through the development strategy for this New Neighbourhood and the boundary confirmed in the Policies, Sites and Places DPD. However, it would be appropriate to amend Policies CS14

and CS26 and the supporting text to more clearly define the route map for developing the town centre, and to ensure that there is consistency in terminology between the policies. We propose to consider these amendments as part of the post Submission changes.

In respect of the wider visioning/concept planning which is progressing as part of the development strategy for the Cribbs/Patchway New Neighbourhood, now including Filton Airfield, we welcome the ongoing input from the owners of The Mall and understand that you and their other representatives are working closely with our project lead officer, Jon Severs.

3) Distribution of Comparison Floorspace between Centres

In terms of the distribution of new comparison floorspace, Policy CS14 indicates that this will be directed into town and district centres. This includes the new centres to be designated at Cribbs Causeway and in the Filton/M32 area. Given NLP's interpretation that Policy CS14 relates to existing centres only, it would be appropriate to clarify Policy CS14 to refer to new and existing centres. We propose to consider these amendments as part of the post Submission changes.

The Way Forward

We would like to propose a way forward that addresses the points set out above, as well as the current proposals for The Mall. In respect of the latter, it is not our intention to raise any in principle objections on planning policy grounds to the proposals for John Lewis and the Dorothy Perkins unit. Rather, the meeting on 23rd September will focus on the information needed to support a planning application for the Dorothy Perkins unit.

However, we are strongly of the opinion that the wider regional/sub-regional impacts of further floorspace growth at The Mall on competing higher order centres need be fully understood. The Council is therefore proposing to undertake the following:

- to commission an independent study to assess the impact of further floorspace growth at The Mall on centres within this regional shopping centre's catchment area. We intend to share the scope of the brief with you before the study is commissioned; and
- to include an assessment of further floorspace growth at The Mall within the traffic modelling work that has already been commissioned for the Cribbs/Patchway New Neighbourhood;

We don't envisage that this work will affect the timetable for the Core Strategy or The Mall's current proposals for John Lewis and the Dorothy Perkins unit, but will ensure that a clear context is established by which to understand the impact of the NLP identified 50,000 sq.m.net and how this could be disaggregated between local need and the wider sub-region.

We have also identified some minor amendments to Policies CS14 and CS26 that we would like to make as part of the post Submission changes to the Core Strategy.

Yours sincerely

Patrick Conroy
Spatial Planning Team Manager