

South Gloucestershire Core Strategy Examination Action List

Proposed Changes –Matter 13- Town Centres and Retail

1. At the EiP Session on Matter 13 three modifications were requested by the Inspector or proposed by the Council in respect of Policy CS14. These are described below with the proposed modifications set out in Appendix 1. In addition, a note on the Sustainability Appraisal process has been prepared in response to the Inspector's request. This is attached as Appendix 2.

Retail Hierarchy

2. Following discussion at the EiP, at the Inspector's request, officers agreed to include the retail parks within the retail hierarchy in Policy CS14 and delete the final paragraph of the policy.

The Mall/Cribbs Causeway

3. In order to improve the clarity of Policy CS14, the Council's barrister suggested that the part which related to The Mall/Cribbs Causeway be removed and redrafted as a separate policy. This was agreed by the Inspector. Officers have therefore drafted a new Policy CS14A and supporting text.

Improving clarity

4. At the Inspector's request, officers have looked at being more explicit about the policy for Cribbs Causeway. Without changing the intent of Policy CS14, this has also provided an opportunity to:
 - a) clarify the Council's vision for the transformation of The Mall and surrounding areas; and
 - b) clarify how the first para in Policy CS14 following the retail hierarchy, as set out in PSM13, would be applied for Area 5:

“New investment in main town centre uses will be directed into the town and district centres, consistent with the scale and function of the centre, and to Area 5 at Cribbs Causeway in accordance with Policy CS26 (see Figure 6.)”

Sustainability Appraisal

5. Discussion at the EiP centred on the Sustainability Appraisal not testing different floorspace growth scenarios at The Mall/Cribbs Causeway. While the principle of amending the Sustainability Appraisal to address this was accepted, the Inspector indicated that it would be helpful if the Council provided a note clarifying the process by which this would be achieved. This note is set out in Appendix 2.

POLICY CS14 - TOWN CENTRES AND RETAIL (EXCLUDING CRIBBS CAUSEWAY)	
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:	
<i>Centres</i>	<i>Role & Function</i>
Town Centres	
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
District Centres	
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
Local Centres & Parades	
49 Centres/Parades (listed in Table. 3)	Provide local level services
<i>Out-of-Centre</i>	
<u>Abbey Wood and Longwell Green Retail Parks</u>	<u>Development proposals at Abbey Wood and Longwell Green Retail Parks will be treated as out-of-centre and will need to satisfy the sequential test. The future role of Abbey Wood Retail Park is addressed under Policy CS25.</u>

Cribbs Causeway

Development proposals for main town centre uses within Area 4 of Figure 6 are addressed in Policy CS14A

New investment in main town centre uses will be directed into the town and district centres, consistent with the scale and function of the centre., ~~and to Area 5 at Cribbs Causeway in accordance with Policy CS26 (see Figure 6).~~

This investment will include making provision for ~~34,000~~ 16,000 sq.m. net of new comparison floorspace by 2026 to meet the needs of the communities in South Gloucestershire, ~~18,000 sq.m. of which will be provided within Area 5 at Cribbs Causeway.~~ The ~~remaining~~ distribution of this floorspace will be ~~identified in~~ through the Policies, Sites and Places Development Plan Document.

~~In recognition of the wider catchment that The Mall serves, provision will be made for an additional 17,000 sq.m. net of new comparison floorspace, giving a total of 35,000 sq. m. net additional floorspace provision within Area 5 at Cribbs Causeway by 2026.~~

~~Proposals for new retail floorspace within Area 5 will be required to demonstrate that they are in accordance with the Cribbs/Patchway New Neighbourhood SPD and the place-making objectives set out in Policy CS26.~~

~~Full retail impact assessments will be required for any planning application within Area 5 which, either alone, or cumulatively with previously approved applications, would exceed 20,000 sq.m. net of new comparison floorspace provision.~~

Development in local centres/parades will be to meet local needs only, 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.

This will be achieved by:

- Identifying in the Policies, Sites and Places Development Plan Document 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.

~~Development proposals outside Area 5 at Cribbs Causeway and at Abbey Wood and Longwell Green Retail Parks will be treated as out-of-centre and will need to satisfy the sequential test. The future role of Abbey Wood Retail Park is addressed under Policy CS25.~~

- 9.22 This policy sits alongside the town centre and retail policies in the South Gloucestershire Local Plan, until *these Local Plan policies are* replaced by the Policies, Sites and Places DPD, and Policy CS13 (Non-Safeguarded Economic Development Sites). *All t*These policies are aimed at protecting and strengthening the health and vitality of centres, recognising their important social function and sense of place, as well as safeguarding against the loss of shops and other services in centres and villages, including individual premises within the urban area, in recognition of their importance to the local community and the local economy. Policy CS14 is supported by the South Gloucestershire Town Centre and Retail Study. This Study sets out a strategy for the management and growth of centres over the plan period, including a centre hierarchy and identifies future retail floorspace requirements. Communities will also be empowered to shape the future of their town, district and local centres through opportunities presented by Neighbourhood Planning.
- 9.23 National policy requires a network and hierarchy of centres to be defined. Due to its settlement pattern, South Gloucestershire is characterised by a number of town centres. These centres, particularly the traditional ones, are highly valued by their local communities for their heritage and functions. In addition to retail, all the centres provide, to a greater or lesser extent, a range of services and facilities including financial, community, leisure, employment and housing.
- 9.24 Over the past 20 years, retail expenditure has polarised towards the out-of-town retail parks, The Mall Regional Shopping Centre and freestanding stores. *Partly as a consequence* ~~Consequently~~, the traditional centres have seen a decline in the proportion of shop frontages in retail use, with an increase in non-retail uses such as cafes, takeaways, and building societies etc. The role of the centres has become more focused upon meeting day to day convenience needs with comparison shopping comprising more of amenity goods such as chemist items, household hardware etc. Furthermore, a number of these centres do not offer the space for development or find it difficult to attract comparison retail investment. There is, therefore, a need to redefine the role and increase the competitiveness of certain centres to ensure they continue to meet the needs of the local community and maintain viability and vitality. Further out-of-centre development will be carefully controlled *to support* ~~so as not to undermine~~ this strategy.
- 9.25 In addition to existing centres, a new district centre will be created at Patchway with the development of Charlton Hayes, as an expansion of the current local centre on Rodway Road. The classification of 'district' is in recognition that, unlike the town centres, the role of this centre will be more local. This classification will be kept under review. A new centre is *also* proposed, potentially on land currently occupied by Sainsburys and B&Q off Great Stoke Way, to serve the new housing areas to be developed along the

Ring Road in the Stoke Gifford/Filton area, UWE and nearby existing housing and employment areas. As part of the development and re-modelling of the area between Filton and the M32, a broader range of uses, including an element of retail, will be promoted at Abbey Wood Retail Park in line with its location adjacent to a main line rail station, major employment and housing areas, and away from the sale of bulky goods. The park will continue to be treated as out of centre for the purposes of national planning policy (see Policy CS25).

9.26 ~~Cribbs Causeway represents a significant area of out-of-centre development, which includes The Mall, retail parks, free-standing stores, and leisure development. The Mall is a Regional Shopping Centre which serves the retail needs of both South Gloucestershire residents and of the wider sub-region. The Cribbs Causeway area as a whole provides a substantial proportion of South Gloucestershire's comparison floorspace. In recognition of the role which the area performs, it is the Council's intention to work towards transforming the area by creating more of a town centre character, including new retail floorspace provision in Area 5 (as shown in Figure 6) as an integral part of the Cribbs/Patchway New Neighbourhood established under Policy CS26. This transformation will be developed through Policy CS26 and delivered through the Cribbs/Patchway New Neighbourhood SPD. The aim of this re-modelling will be to better integrate the area with surrounding communities, by introducing a mix of uses and reducing the dominance and severance caused by the current reliance on the car as the primary means for accessing and moving around the area. Consideration will be given to developing a part of Cribbs/Patchway New Neighbourhood to serve the more local needs of existing and future communities in the Cribbs Causeway area. Post 2026, and provided that a town centre character is developing in the central part of the Cribbs Causeway area, the Council's aspiration would be to recognise this through designation as a town centre.~~

9.27 In addition to the larger centres, there are 49 local centres/parades within the urban area and larger village settlements which meet the needs of local residents for everyday convenience goods and basic services within walking distance, thereby providing an essential and valuable service. New local centres will be created to serve the strategic housing areas referred to in the Strategy for Development. There are also a significant number of smaller village shopping centres and local shops throughout the district.

Table 3 - Local Centres and Parades

Communities of the Bristol North Fringe			
1.	Gloucester Road North	7.	Gloucester Road, Patchway
2.	Filton Avenue (Nos. 508-550 & 551-557)	8.	Kingsway, Little Stoke
3.	Filton Avenue (at junction with Conygre Rd)	9.	Chelford Grove, Patchway
4.	Station Road, Filton	10.	Ratcliffe Drive, Stoke Gifford
5.	The Parade, Coniston Road, Patchway	11.	Peartree Road, Bradley Stoke
6.	Coniston Road, Patchway	12.	Webbs Wood Road, Bradley Stoke

Downend/Hanham/Kingswood/Staple Hill			
13.	Baugh Gardens	26.	Oldland Common Village
14.	Burley Grove	27.	Poole Road, Soundwell
15.	Cleeveood Road, Downend	28.	Pound Road, Kingswood
16.	Dibden Road, Mangotsfield	29.	Quakers Road Parade, Downend
17.	Ellacombe Road, Longwell Green	30.	Soundwell Road, Kingswood
18.	High Street, Hanham	31.	Station Road, Kingswood
19.	Holly Hill Road	32.	Stockwell Drive, Mangotsfield
20.	Longwell Green Parade, Bath Road	33.	Tibberton, Kingswood
21.	Mangotsfield Village (St James Place, St James's St, Cossham St)	34.	Warmley Village (Deanery Road, High St, Stanley Rd, Tower Rd North)
22.	Memorial Road, Hanham	35.	Westbourne Road Parade, Downend
23.	New Cheltenham Road, Kingswood	36.	Westcourt Drive, Oldland Common
24.	Newton Road/School Road, Cadbury Heath	37.	Westons Way, Kingswood
25.	North Street/Pleasant Street/Victoria Street		
Thornbury			
38.	Oakleaze Road		
Winterbourne/Frampton Cotterell			
39.	Lower Stone Close, Church Road and Woodend Road, Frampton Cotterell	41.	Bradley Avenue, Winterbourne
40.	Flaxpits Lane, Whitegates and High Street, Winterbourne	42.	Park Avenue, Winterbourne
Yate & Chipping Sodbury			
43.	Abbotswood Shopping Centre	47.	Cranleigh Court Road
44.	Brimsham Park, Yate	48.	Firgrove Crescent
45.	Heron Way	49.	Westerleigh Road Stores
46.	Wellington Road		

9.28 Beyond existing commitments, the Town Centre and Retail Study does not identify any requirement for convenience floorspace, although it does recognise that further floorspace is justified where this addresses a shortfall in provision in a local area (see Policy CS30 which identifies a new food store in Chipping Sodbury). By contrast, after taking account of commitments, a shortfall in comparison floorspace is identified for the period 2011 – 2026 of

34,000 sq.m. net. However, the Study recognises that the existing centres may have neither the physical nor market capacity to accommodate this level of growth, and that the Cribbs Causeway area is a principal retail destination for residents of South Gloucestershire. Consequently, taking a national policy compliant sequential approach, the Study concludes that it is appropriate to apportion a share of comparison floorspace requirements to the Cribbs Causeway area. Taking account of the Study's indicative distribution of future comparison floorspace, assigns a significant proportion to 18,000 sq.m. net is assigned to Area 5 in the Cribbs/Patchway New Neighbourhood (see Policy CS14A) as shown in Table 3A below. 18,000 sq.m. net is identified to come forward within Area 5 as shown on Figure 6. The indicative distribution of comparison floorspace is shown in Table 3A below. The Policies, Sites and Places Development Plan Document will distribute the other 16,000 sq.m. net comparison floorspace in Table 3A between town and district centres and the new local centre in the Cribbs/Patchway New Neighbourhood, identify sites, define town centre and primary retail area boundaries and define primary and secondary frontages.

Table 3A - Indicative distribution of 34,000 sq.m. net comparison floorspace to meet the needs of South Gloucestershire residents

The figures in this table are based on local circumstances and opportunities and are, therefore, indicative. Centres may exceed these figures if appropriate proposals come forward.

Centre	Floorspace sq.m. net
Yate/Chipping Sodbury	3,000
Emersons Green	3,000
Kingswood/Thornbury/Bradley Stoke	3,000
Filton/Downend/Staple Hill/ Hanham/Patchway	3,000
Cribbs/Patchway New Neighbourhood	20,000
<i>The Mall Area 5</i> 18,000	
Local centre (new) 2,000	
Stoke Gifford (new centre)	2,000
Total Floorspace	34,000

(Based upon Table 5.1 of RTP Retail Study Update 2011)

~~9.28a In recognition of the dual role of The Mall as both a local and sub-regional comparison shopping destination, provision will be made for a further 17,000 sq.m. net of new comparison floorspace to serve its wider catchment area within Area 5 previously referred to. The total additional floorspace provision within The Mall/Cribbs Causeway area between 2011 and 2026 will therefore be 35,000 sq.m. net. This is the maximum floorspace appropriate without significantly affecting the vitality and viability of Bristol City Centre or prejudicing further investment in this City Centre. However, the delivery of this floorspace will be plan-led, guided through the masterplanning for a re-~~

~~modelled Cribbs Causeway area as set out in the place-making objectives of Policy CS26 and the Cribbs/Patchway New Neighbourhood SPD. Further, in order to keep the impact of floorspace growth in Area 5 under review, full retail impact assessments will be required for any planning applications which, either alone, or cumulatively with previously approved applications, would exceed 20,000 sq.m. net of new comparison floorspace provision.~~

- 9.29 National policy requires an impact assessment for any edge-of-centre or out-of-centre proposal over a floorspace threshold of 2,500 sq.m. gross unless a local lower threshold is set. This *national* threshold does not ~~allow for~~ adequately reflect the situation in South Gloucestershire where centres are relatively small, there is a dominance of out-of-town floorspace, particularly for retail, and a number of the centres are experiencing reduced vitality. As a consequence, smaller developments can, on their own or cumulatively, have a significant impact on existing centres and the threshold ~~should~~, therefore, be is lowered to 1,000 sq.m gross to reflect this.

Delivery

- 9.30 This policy will be delivered through the development management process. The delivery of floorspace at ~~The Mall/Cribbs Causeway~~ the local centre in the Cribbs/Patchway New Neighbourhood will be linked with the masterplanning/SPD for the Cribbs/Patchway New Neighbourhood as set out in Policy CS26. The distribution of the comparison floorspace between other centres and the identification of sites for this new floorspace will be set out in the Policies, Sites and Places DPD and through neighbourhood planning.

NB THE FOLLOWING POLICY AND PARAS ARE NEW TEXT

POLICY CS14A - CRIBBS CAUSEWAY

Cribbs Causeway, identified as Area 4 in Figure 6, is an out-of-centre location that contains a mix of retail, storage and distribution and leisure uses, and includes The Mall Regional Shopping Centre.

The Council's vision is that, by 2026, the nature, function and form of The Mall and its surroundings will have been transformed to include a mix of town centre uses serving the Cribbs/Patchway New Neighbourhood.

This transformation will primarily be achieved by new investment in main town centre uses within Area 5, as defined on the Policies Map, and supporting infrastructure. This investment will include provision for 35,000 sq.m. net of new comparison floorspace by 2026. 18,000 sq.m. net of this new floorspace will be to meet the needs of the communities in South Gloucestershire, with the remaining 17,000 sq.m. net in recognition of the wider catchment that The Mall serves.

Proposals for main town centre uses which come forward within Area 5, and which accord both with this policy and Policy CS26, will not be required to undertake the sequential test. However, they will be subject

to the following safeguards and pre-conditions:

- 1. Proposals for new main town centre uses within Area 5 will be required to demonstrate that they are in accordance with the Cribbs/Patchway New Neighbourhood SPD and the place-making objectives set out in Policy CS26;**
- 2. Full impact assessments will be required for any retail planning application within Area 5 which, either alone, or cumulatively with previously approved applications, would exceed 20,000 sq.m. net of new comparison floorspace provision; and**
- 3. New development will be required to support the vision for the area, and introduce a greater mix in size, scale, use, form and function.**

Impact assessments will not be required for other main town centre uses which come forward within Area 5.

Proposals to designate a town centre will be subject to assessment and will then, if appropriate, be brought forward in a future review of the Core Strategy.

Main town centre proposals outside of Area 5 at Cribbs Causeway will be treated as out-of-centre and will need to satisfy the sequential test.

- 9.31 Cribbs Causeway, identified as Area 4 in figure 6, represents a significant area of out-of-centre development, which includes The Mall Regional Shopping Centre, retail parks, free-standing stores, and leisure development. The Mall is a key asset in the local economy and serves the retail needs of both South Gloucestershire residents and the wider sub-region. The Cribbs Causeway area as a whole provides a substantial proportion of South Gloucestershire's comparison floorspace.
- 9.32 The Council has had a long standing objective to better integrate the Cribbs Causeway retail area with neighbouring residential communities. Its position within the Cribbs/Patchway New Neighbourhood, to be developed through Policy CS26, also provides an opportunity to integrate new residential development with the retail area and realise a more ambitious vision to transform The Mall and its environs to form the focus of a new town centre to serve the communities in this New Neighbourhood. Creating a new town centre for the New Neighbourhood at Cribbs Causeway represents an efficient use of land by removing the need to duplicate town centre functionality elsewhere in the New Neighbourhood. However, for this vision to be achieved, the transformation process needs to be integral to the masterplanning of the New Neighbourhood.
- 9.33 In addition to integration, the aim of this transformation will be to introduce a mix of uses and reduce the dominance and severance caused by the current reliance on the car as the primary means for accessing and moving around the Cribbs Causeway area.
- 9.34 The Council's vision is consistent with the plan-making and decision-taking core principles of the NPPF, which include the role that plan-making should play in proactively driving and supporting sustainable economic development, and focussing significant development in locations which are or can be made

sustainable. In developing this vision the Council wants to avoid the alternative of an uncoordinated approach driven by speculative planning applications, which will fail to deliver the sustainable mixed and balanced community that South Gloucestershire residents deserve.

- 9.35 This transformation will primarily be achieved by focussing main town centre uses within Area 5 on the Policies Map, and identified on Figure 6, together with supporting infrastructure. Provided that such proposals accord with this policy and Policy CS26, in accordance with the NPPF the sequential test will not be required.
- 9.36 The built form of the new development will support the transformation, changing the visual appearance and the nature and patterns of use. For example, it is unlikely that a perpetuation of the existing form of development, such as the further development of large anchor stores will be consistent with this vision. The vision is more likely to be realised through bringing forward development which introduces a greater mix in size, scale, use, form and function.
- 9.37 With regard to retail development, the Council has made provision for 35,000 sq.m. net of comparison floorspace to come forward within Area 5. Of this, 18,000 sq.m. would be to meet the needs of South Gloucestershire residents, as evidenced by the Town Centre and Retail Study. This study takes a national policy compliant sequential approach, concluding that, as the existing centres have neither the physical nor market capacity to accommodate all the identified growth, it is appropriate to apportion a share to The Mall/Cribbs Causeway. The remaining 17,000 sq.m. is assigned to meet the wider needs of the sub-region.
- 9.38 The Council has assessed the impact of different levels of retail growth at The Mall, including 35,000 sq.m. net comparison floorspace growth. The Council is satisfied that a 35,000 sq.m. increase in floorspace is evidentially sound and represents an appropriate balance between the impact on competing centres and the level of retail investment necessary to support the infrastructure provision required to help achieve the transformation of Area 5 at Cribbs Causeway as the focus for a new centre. Although The Mall is relatively small in comparison with other regional shopping centres, and with the size of Bristol City Centre, the Council's retail impact assessment shows there will be some impact on Bristol City Centre and Weston-Super-Mare town centre. These centres, however, will continue to grow and the Council's assessment is that the benefits overall significantly outweigh the scale of the potential impacts identified
- 9.39 Notwithstanding this assessment, the Council will apply the further safeguard of requiring full impact assessments for any planning application within Area 5 which either alone, or cumulatively with previously approved unexpired or implemented planning applications permitted from 2011 onwards, would exceed 20,000 sq.m. net of new comparison floorspace. Other main town centre uses will not require impact assessments.
- 9.40 Main town centre uses proposed outside Area 5 will be treated as out-of-centre and will be subject to the sequential test.
- 9.41 It is not intended to designate a town centre at Cribbs Causeway in this Core Strategy. Any designation will be brought forward in a future review of the

Core Strategy, following an assessment as to how far the Council's vision for the area has been realised.

Delivery

- 9.42 This policy will be delivered through the development management process. The delivery of main town centre uses in Area 5 at The Mall/Cribbs Causeway will be linked with the masterplanning/SPD for the Cribbs/Patchway New Neighbourhood as set out in Policy CS26.

SA of the Mall, Cribbs Causeway – proposed Policy CS14A

Introduction

It was agreed by parties during the Matter 13 hearing session on 26 June that the Council has not undertaken the necessary sustainability appraisal of the proposals to expand The Mall, as required by the Environmental Assessment of Plans and Programmes Regulations 2004. However it was also agreed by parties that this can be remedied prior to the Core Strategy's adoption so that all regulatory requirements are met.

If the Inspector is minded to accept the Council's suggestion for a main modification to be made to the plan that introduces new policy CS14A, which would specifically set out the proposals for the expansion of the Mall by 35,000 square metres, then a sustainability appraisal would be required to be undertaken on that policy.

Process for producing the SA of CS14A

Should the Inspector propose main modifications to the Core Strategy to bring forward up to 35,000 sq m of retail growth of the Mall under proposed new Policy CS14A, the proposals would be required to be assessed against reasonable alternatives. The Council considers that the reasonable alternatives would be:

- no growth scenario;
- the reasonable alternatives within South Gloucestershire capable of accommodating all or part of the 18,000 sq m proposed to meet the needs of communities in South Gloucestershire; and
- the reasonable alternatives within Weston-super-Mare town centre and Bristol City Centre capable of accommodating all or part of the 17,000 sq m proposed to meet the need generated by the wider catchment of the Mall.

The process by which SA of any proposed modifications (including CS14A) would be undertaken is as follows:

- 1) Inspector produces his draft/preliminary conclusions containing his proposed main modifications.
- 2) Council undertakes SA on the Inspector's proposed main modifications and prepares for public consultation.
- 3) Council publishes proposed modifications and SA Report for consultation (six weeks).
- 4) Council receives responses which it compiles and passes to Inspector together with the SA for his consideration.
- 5) Inspector considers whether there is a need to hold an examination session in light of the representations received and the SA Report produced before he produces his final report.