

Bristol City Council

Further Representation to the South Gloucestershire Core Strategy

Matter 30:

Bristol City Council's concerns with respect to proposals for the Cribbs Causeway and the Mall are set out in earlier submissions to the Examination:

- Representations to Post Submission Changes. The Mall/Cribbs Causeway. Policies CS14, CS25, CS26
- Further representations. Matter 13. Town Centres and Retail. Policy CS14
- Further representations. Matter 22. Communities of the North Fringe. Policy CS26.
- Further representations. Matter 4. Sustainability Appraisal.

The following paragraphs set out the Council's further views in relation to proposals to create separate policies CS14 and CS14A.

1. Changes to Retail Policy in Relation to the Submitted Core Strategy

- 1.1 The latest proposed policy wording for Town Centres and Retail and for the Cribbs Causeway area is set out in document CE13: "Matter 13 response for Inspector, policies CS14 and CS14A". This fails to address the concerns of Bristol City Council.
- 1.2 The latest policy proposals for retail development and the Cribbs Causeway area are radically different from the approach set out in the submitted Core Strategy. The submitted Core Strategy did not contain any proposals for major retail development at Cribbs Causeway, including the extension to The Mall. The Key Issues, Vision and Strategic Objectives of the submitted Core Strategy made no reference to expansion of The Mall, or to establishment of Area 5 as a centre or focus for development of main town centre uses.
- 1.3 The latest policies would collectively allow for 51,000 sq.m of comparison retail floorspace: 65% more than set out in the submitted Plan. 35,000 sq.m (60%) of that floorspace would be focused in a single out of centre location. The 35,000 sq.m allocation is greater than the entire level of new retail floorspace envisaged in the published Core Strategy.

- 1.4 There have been no changes in circumstances which would suggest that such a significant change from the submitted plan is justified or appropriate.
- 1.5 The proposed policy would support development of 35,000 sq.m of retail development in an out-of-centre location which is not included in a retail hierarchy and which does not function as a town centre. It would also allow for the development of up to 20,000 sq.m of comparison retail floorspace at an out of centre location without a requirement for an impact assessment.
- 1.6 Paragraphs 4.2 to 4.4 of the Council's Town Centres and Retail Study Update and Impact Assessment December 2011 (EB63) set out the limitations of the evidence in assessing the impacts of the proposals on other centres. Given these clearly stated limitations to the evidence in addressing impact it is evident that the Study Update does not provide a safe or sound basis for the Core Strategy to allow for significant retail development in an out-of-centre location.

2. Approach to Retail Strategy at Cribbs Causeway

- 2.1 Bristol City Council considers that the proposed changes to retail policy would render the Core Strategy unsound as they are unjustified by evidence and clearly contrary to national planning policy. The new proposed policies for the Cribbs Causeway area compound the unsound approach.
- 2.2 A sound approach is, however, readily available. The submitted Core Strategy provided a sound approach, which was justified by evidence, effective and consistent with the NPPF. That approach complemented the adopted Core Strategies of Bristol City Council and North Somerset Council and provided an appropriate strategy for growth based on sustainable centres. The approach in the submitted Core Strategy would strengthen the established South Gloucestershire town, district and local centres whilst allowing for local service development in new communities. It would not undermine the vitality, viability or appropriate growth of centres in neighbouring areas.
- 2.3 Any development proposals at Cribbs Causeway should be considered within the appropriate hierarchy of centres across the sub region and against the policy of the NPPF which has a particular focus on town centres in its section entitled 'Ensuring the vitality of town centres'.

3. Comments on Policies CS14 and CS 14A

Policy CS14 – Town Centres and Retail (excluding Cribbs Causeway)

- 3.1 The current revision of Policy CS14 – now separated to form two policies: CS14 and CS14A - offers no significant benefits in terms of addressing the City Council's objections. Proposed Policy CS14 is somewhat unclear as it fails to identify that Cribbs Causeway (Area 5) is ultimately intended to be placed at the head of the hierarchy of centres in South Gloucestershire.
- 3.2 Otherwise, Policy CS14 is broadly acceptable, but concerns remain over whether there is sufficient commitment to promoting retail growth at existing centres, potentially resulting in an unjustified allocation of growth at Cribbs Causeway.

Policy CS14A – Cribbs Causeway

- 3.3 The new policy, incorporating elements of the previous CS14, fails to address the fundamental failings of the previous policy iteration.
- 3.4 Although suggested to be part of the Council's longstanding objectives, the proposals for Cribbs Causeway have only recently been expressed as suggestions and have continued to evolve through the Examination. They bear no resemblance to the retail strategy proposed in the Submission Core Strategy.
- 3.5 New policy CS14A promotes a major town centre development in an out of centre location and may seek formal town centre status in a review of the Core Strategy - once the development has taken place.
- 3.6 The policy does not include a requirement to undertake the sequential tests for retail or leisure development, contrary to NPPF (paragraph 24).
- 3.7 The approach to impact assessments for development in Area 5 is inappropriate. A threshold of 20,000 sq.m for retail development in Area 5 is wholly inconsistent with NPPF: the default figure of 2,500 sq.m. given in the Planning Framework is appropriate. No impact thresholds are provided for leisure or office developments, where the default figure of 2,500 sq.m. would normally apply. This is also contrary to NPPF.
- 3.8 The limited objective of better integrating the Cribbs Causeway retail area with neighbouring residential communities (as set out in paragraph 9.3) is not proportionate with the development which the

policy allows for. Policy CS14A indicates that the vision is to include a mix of town centre uses serving the Cribbs/Patchway New Neighbourhood. However, the policy allows for a level of retail and other main town centre uses which is grossly disproportionate to any role of meeting local needs.

- 3.9 Cribbs Causeway is an out-of-centre shopping destination located adjacent to two motorway junctions. The Mall has catchments of at least 2.6 million people within a 45 minute drive time. The effect of Policy CS14A, in allowing the Mall to be extended, would be to greatly increase its potential attractiveness across these wide catchments. This would add significantly to the likelihood of generating car based and long distance shopping and is wholly inconsistent with the NPPF (paragraphs 23 and 30).
- 3.10 A better approach to serving new communities would be to provide appropriate convenience shopping at locations close to where people live (as proposed at Charlton Hayes).