



Matter 3 (Initial Chapters inc. Spatial Portrait, Vision & Objectives) - Questions 1, 2 and 3

Representation number 3913217

**NLP on behalf of Cribbs Mall Nominee (1) Ltd and Cribbs Mall Nominee
(2) Ltd and J T Baylis**

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- 1.0 **(1) Does the Spatial Portrait provide a reasonable snapshot of the area and the issues which face it?**
- 1.1 The Spatial Portrait has remained more or less unchanged through the Pre-Publication Submission Draft (March 2010); December 2010 and December 2011 changes to the Core Strategy. The changes that have been made are considered to be editorial or factual. We therefore comment in this submission on the Proposed Changes 2011 version which is the most up to date.
- 1.2 As written, the Spatial Portrait generally reflects the characteristics of the District, save for an important omission, in that there is no reference to the retail and commercial areas at Cribbs Causeway. These areas are of key importance for the economy of South Gloucestershire as well as providing the main concentration of retail and leisure facilities for local residents and those living further afield, and should be recognised as such. Work undertaken by NLP for the owners of The Mall in July 2011 (Economic Study of Cribbs Causeway Retail & Leisure Complex Summary Update, July 2011)) concluded, inter alia, that:
- 1 Cribbs Causeway is a major source of local employment in South Gloucestershire and Bristol, accounting for nearly 4,700 direct permanent jobs, some 3% of all employees in the District and 31% of retail sector jobs.
 - 2 In total, Cribbs Causeway supports up to 5,600 jobs, directly and indirectly across the local area. At the wider regional level, some 6,600 jobs are supported.
 - 3 Recognising the seasonal nature of retail employment, Cribbs Causeway supports a further 1,400 staff during the peak summer/Christmas periods.
 - 4 The contribution of Cribbs Causeway to the local economy in terms of income is calculated (in 2011) at £57 million. Taking account of indirect and induced benefits, the overall contribution to the local economy is £68 million, rising to £79 million in the regional economy.

1.3 In the light of the above, an additional paragraph acknowledging the presence of the Cribbs Causeway commercial and leisure complex and its role as part of the Spatial Portrait of the District is needed. We suggest below some text that could be incorporated:

“The commercial, retail and leisure complex at Cribbs Causeway provides the largest concentration of shopping and leisure facilities in the District and is a major source of employment.”

2.0 **(2) Are the Strategic Objectives broadly consistent with the aspirations of organisations and the population and do they provide appropriate goals for the Council to pursue?**

2.1 In the first instance these comments are made in respect of the Post Submission Changes version of the Core Strategy (December 2011).

2.2 Overall, the strategic objectives do reflect the aspirations of the owners of The Mall in that they seek to maintain economic prosperity and provide for key sectors including retail.

2.3 However, in the light of the NPPF it is felt that the objectives could better reflect the requirement in that document to plan positively and to meet identified needs. We note that the Planning Inspectorate has introduced a model policy for the presumption in favour of sustainable development and consider that this should be included in the plan, and it will be for the Inspector to decide how and where that should be incorporated. Notwithstanding this, the language of the objectives set in chapter 4 should be amended to demonstrate compliance with the presumption in favour of sustainable development, and a positive approach to planning, and so that it is clear throughout the document that sustainable development should proceed without delay (paragraph 15 of the NPPF). For example:

- 1 Managing Future Development should change to “Planning Positively for Future Development”
- 2 Maintaining Economic Prosperity should change to “Enhancing Economic Prosperity.”

2.4 Within “Maintaining Economic Prosperity”, it should be made clear that the plan will provide for the full needs of key sectors (to conform with paragraph 23 of the NPPF)

2.5 It should be noted that whilst these comments relate to the Post Changes version of the Core Strategy published in December 2011, they apply equally to the Submission version.

3.0 **(3) Are there any Visions which the Council has put forward which are inappropriate or unrealistic?**

3.1 These comments relate to the vision for the North Fringe.

3.2 At Pre-Publication Submission Stage, the owners of The Mall supported the vision, which recognises the North Fringe as being a major economic driver and its role as a focus for employment, commercial and retail activity as well as education and learning.

3.3 The owners maintain this support, and indeed this particular vision has remained as drafted in March 2010.

3.4 This part of the vision is appropriate and realistic and, in acknowledging the strengths of this part of the District, is an example of planning positively as required by the NPPF.