



Matter 13 (Town Centres and Retail) - 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

This written submission relates to the Core Strategy Proposed Changes December 2011. It should be noted that the owners representations to the submission version (March 2011) remain – i.e. that the submission version of the plan is unsound in respect of the issues identified here. Those representations were dated 6 August 2010. Further representations were also made in February 2011, to the Filton Position Statement in July 2011 and to the draft NPPF in August 2011.

1.0 **(1) Is the hierarchy and role of the various centres appropriately defined in policy CS14?**

1.1 Yes – for the existing Centres, the hierarchy reflects their current role as set out in the policy and arising from the evidence base on retail and town centre matters. For emergent centres, the existing sub-regional role of Cribbs Causeway/The Mall is recognised.

1.2 The below table provides the 2008 Management Horizons rankings for the centres in South Gloucestershire. It shows clearly that Cribbs Causeway/The Mall ranks far above the existing centres listed in the policy – at 126th, some 261 places above the next placed centre which is Yate.

1.3

Centre Name	Rank
Cribbs Causeway (inc The Mall)	126
Yate	387
Kingswood	629
Thornbury	985
Emersons Green	1175
Patchway	1207
Bradley Stoke	1866
Staple Hill	2247
Downend	2467
Filton	2467
Hanham	3120
Chipping Sodbury	4226

Source: Management Horizons Shopping Index 2008

1.4 In the MHE Index, Cribbs Causeway/The Mall is described as a sub-regional centre due to its rank. The other centres are described as District (in the case of Yate), Minor District, Local or Minor Local. This reinforces the clear differentiation between the role of The Mall and other centres in South Gloucestershire.

1.5 In respect of The Mall/Cribbs Causeway this is described in Policy CS14 as an emergent centre, performing a sub-regional role. The above text and table has shown that the 'sub-regional' role is appropriately defined in respect of the national retail hierarchy. In addition, having regard to the rationale adopted by the Panel who undertook the EiP into the East of England Plan Lakeside Basin Single Issue Review, the scale of existing retail provision, the catchment area and the significant increase in housing which is proposed in the area, a sub regional designation plainly is appropriate to reflect existing and future conditions.

1.6 The Post Submission Changes December 2011 version of the Core Strategy acknowledges that "*The Mall is a Regional Shopping Centre which serves the retail needs of both South Gloucestershire residents and of the wider sub-region.*" In addition, research by NLP has shown that it supports 4,700 direct permanent jobs. It is now a well established destination, having been open since 1998 and has long since been assimilated into the regional retail hierarchy. Having recognised this role, it is incumbent on the local plan to ensure that it can continue to perform this role in the future in order to meet the needs of the community.

2.0 **(2) Should The Mall/Cribbs Causeway be designated as a Sub-Regional Centre and what implications does this have for other retail locations both locally and regionally?**

2.1 Yes – it should be designated as a sub-regional centre as part of the Council's strategy to create a new sustainable community in Cribbs/Patchway (the "Cribbs/Patchway New Neighbourhood"), and to integrate and improve the Mall and other parts of the Cribbs Causeway commercial area as part of that new neighbourhood. New development at The Mall is not just about meeting the retail need identified in the evidence base (which we have commented on in depth in our representations). It is an important ingredient in achieving the transformational change required in the Core Strategy of the Cribbs Causeway area into a sustainable mixed use area with a residential focus. It will also help to fund infrastructure required to facilitate the achievement of the Council's wider objectives for the area. Cribbs Causeway/The Mall is an established retail location, having been open since 1998. Designation as a sub-regional centre, either now or in future through the local plan process, is an appropriate and necessary way of bringing about the change sought.

- 2.2 The NPPF is not prescriptive about whether and how new centres should be designated. It is evident from the glossary to the NPPF that the local plan is the appropriate mechanism through which Town Centres should be defined.
- 2.3 It follows that SGC has adopted an appropriate approach to identifying the need for additional retail floorspace, considered whether it should be in new or expanded centres taking full account of the need to provide for the need for housing and the location of that provision, and formulated policy accordingly.
- 2.4 Setting this in an empirical context, other local planning authorities (and, formerly, regional planning bodies) such as in relation to Merry Hill and Lakeside - have tackled the issue of the “out of centre” regional shopping centres and their evolution/transformation into more sustainable centres, often as a focus for new communities and in response to the requirement to meet identified need for additional retail floorspace.
- 2.5 One approach is at Lakeside, Thurrock. NLP was involved with the designation of Lakeside, Thurrock as a Regional Centre as part of the “Single Issue Review” into the East of England Regional Strategy in 2009 (policies adopted January 2010). The review and resultant RS policies designated Lakeside Thurrock as a Regional Centre (rather than an emergent centre) and allocated 50,000 sqm, net of comparison retail floorspace, amongst other residential and commercial development.
- 2.6 In the Panel Report dated August 2009, the Panel clearly set out its reasoning for the approach taken:
- 1 A gap in the network of centres in the region was identified, with the Panel concluding (paragraph 1.15) that *“The designation of Lakeside as a Regional Centre would thus complete a comprehensive network of town centre provision and would ensure, in the longer term that the Centre meets the town centre needs of an extensive catchment area and its population.”*
 - 2 In considering whether to designate Lakeside as a Centre now or later, the Panel concluded that in this case, designation now would, in itself, provide additional impetus to achieve the “transformational change” required.
- 2.7 Following the Panel Report and adoption of the policies (E5 and ETG2), Thurrock Council then carried forward the policies in their strategic form to its Core Strategy. The Council is now in the process of preparing its Site Specific Allocations DPD which seeks to define the parameters for growth and change at Lakeside and how the pre-conditions to such growth would be met.
- 2.8 The approach being put forward in South Gloucestershire is different, in that an emergent centre is proposed. The quantum of floorspace to be delivered is clearly identified and Policy CS26 provides the parameters for change across a

clearly defined area, of which Cribbs Causeway/The Mall is a part. This more expansive approach in the Core Strategy then allows further detail to come forward by way of an SPD, rather than by way of a further DPD. Indeed, the December 2011 version of the policy confirms that of the 35,000 sqm of additional floorspace provision at The Mall by 2026, 30,000 sqm:

“...will not come forward until the adoption of the masterplan/SPD for the Cribbs/Patchway new neighbourhood and will be expected to contribute to the delivery of the objectives set out in Policy CS26.”

- 2.9 In our view, the question of precisely when the designation of ‘sub regional centre’ is applied is less important than the achievement of overall policy and clarity of policy making: i.e. policies which explain clearly what development is anticipated and where, and the circumstances in which that development would be approved.
- 2.10 We therefore conclude that The Mall/Cribbs Causeway should be designated as Sub-Regional Centre but that whether this designation occurs now, or comes forward at a later date is not critical; what really matters is that policies are clearly drafted to implement the transformational change required, to meet business, retail and housing needs and to provide a positive basis for investment.
- 2.11 The second part of this question is what implications would this have for other retail locations locally and regionally?
- 2.12 We deal with local retail locations first (i.e. those within South Gloucestershire). We have referred above to the evidence base, and to the 2008 Management Horizons Shopping Index which lists retail rankings. These show that Cribbs Causeway/The Mall is:
- Well established in the retail hierarchy
 - Performs a sub-regional role
 - Sits so far above other centres in South Gloucestershire that it is clear it performs a significantly different role, i.e. not one that competes directly with those centres.
- 2.13 The evidence base produced by NLP and RTP clearly shows that The Mall is an established and very important shopping centre for South Gloucestershire residents (RTP 2010, Table 4.11). As such it trades alongside and is complementary to the other centres. This is clearly evidenced by the recent major investment in two of the closest such centres, namely Bradley Stoke and Yate. The implications of improvements at The Mall would not be significant for the other centres in South Gloucestershire.
- 2.14 Given the limited overlap of catchment area with some of the other centres in South Gloucestershire and different offer, the main effect of any further development at The Mall would be on higher order destinations. It is

noteworthy that The Mall has been trading since 1998 and that since that time significant investment and new development has come forward in Bristol, Cardiff and Bath, with further development planned for Weston, Gloucester and Swindon.

- 2.15 Growth at the Mall will not have a significant impact on any existing centre and this reflects the approach adopted in determining appropriate levels of growth in the capacity analysis. Our February 2012 representations to policy CS14 validated much of the latest work undertaken by RTP and demonstrated that the level of floorspace proposed is justified and that the impact would not give rise to significant harm to any centre.
- 2.16 Given the established position of Cribbs Causeway and in particular The Mall, and the economic benefits and opportunities, it is imperative for the Council to plan positively for its future and to plan for growth (within defined parameters to ensure sustainable development, which is achieved, as explained above, by the safeguards in Policy CS14). The alternative, to do nothing, is to plan for decline. This would not meet the identified need, would not represent a positive and proactive approach to plan making, would not conform to the NPPF and would not be sound.

3.0 **(3) Is the expansion of The Mall/Cribbs Causeway consistent with the principles set out in the Planning Framework?**

3.1 Yes.

3.2 In our response to Matter 1 we explain why we consider the expansion to accord with the NPPF, with particular reference to:

- 1 The presumption in favour of sustainable development – i.e. that all development that is sustainable should go ahead without delay.
- 2 This presumption in favour is a “golden thread” running through plan making and decision taking. Paragraph 14 confirms that for plan making, this means Local Plans should meet objectively assessed need, unless the adverse impacts of doing so would “*significantly and demonstrably outweigh the benefits.*”
- 3 Proactively drive and support sustainable development (para 17)
- 4 The planning system should “*do everything it can to support sustainable economic growth*” (para 19)
- 5 Plan proactively to meet the needs of business (para 20)
- 6 Meet retail and other needs in full (para 23)
- 7 Plan positively for development (para 157)

- 3.3 In response to this, Policy CS14 sets out very clearly the requirement for expansion at The Mall and other locations in the District, which arises from its evidence base (i.e. objective assessment).
- 3.4 With regard to the requirement for “sustainable” development, the safeguards in the policy which link the majority of the floorspace to the adoption of the SPD for the new neighbourhood at Cribbs/Patchway ensure that the expansion comes forward in such a way that the social, community and environmental as well as economic, aspects of development are balanced. It also ensures that expansion comes forward in such a way that it contributes to the overall objective of delivering a sustainable new community at Cribbs/Patchway with a new town centre as its focal point.
- 3.5 The Inspector should note our concerns regarding the drafting of Policy CS26 and its conformity with the NPPF, the main point of concern being the lack of clarity in CS26 about how the identified retail needs will be met as part of the creation of a new sustainable community. Provided these concerns are dealt with, the overall approach taken, including in respect of the expansion of The Mall, is consistent with the NPPF.