

**Matter 13 Town Centres
and Retail
26th June 2012
North Somerset Council
Rep no: 6136449**

South Gloucestershire Core Strategy

Further representations from North Somerset Council

The following statement should be read in conjunction with North Somerset Council's representations to the December 2011 South Gloucestershire Post Submission Changes.

Q. 1 *Is the hierarchy and role of the various centres appropriately defined in policy CS14?*

- 1.1 North Somerset Council (NSC) representations on the shopping hierarchy listed in Policy CS14 are focused on the substantial allocation of retail floorspace to Cribbs Causeway. This approach could hinder the improvement and regeneration of other Town and District Centres which, as a result have been allocated a much reduced share of comparison floorspace.
- 1.2 It also seems to fly in the face of recent government advice contained in the National Planning Policy Framework (NPPF) which states (para 23) that ***“Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period”*** ; also that ***“..local planning authorities should recognise town centres as the heart of their communities and pursue policies for the management and growth of centres over the plan period.”***
- 1.3 The proposed retail allocation of 35,000 m² net additional new comparison floorspace at The Mall by 2026 in Policy CS14 represents a 61% increase in floorspace which will have a significant adverse impact on the health of retail centres in the sub-region. There is particularly the case at Weston-super-Mare which is looking to secure a regeneration-led recovery and is very vulnerable to the potential impacts of expansion at The Mall, including the erosion of business confidence which could compromise current proposals.
- 1.4 NSC believes that the approach to setting a hierarchy of Town Centres set out is basically sound in respect of existing centres, but has been

made unsound by virtue of the addition to Policy CS14 of the Cribbs Causeway Area as an “Emergent Centre”.

Q.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 NSC object to the proposed change of status of the Cribbs Causeway area from an ‘out-of-centre location’ to a ‘sub-regional centre’ in the future in Policies CS14 and CS26 – and therefore being identified as a higher order centre in terms of its formal planning status.
- 2.2 The potential for The Mall to be defined as a formal sub-regional centre is of concern. It is predominantly a car borne shopping centre which due to its proximity to the M4 and M5 has a very wide catchment area. It is not at the heart of any community. Giving it sub-regional status has serious implications. For example, under current planning policy and the sequential approach, further extensions would be far easier to justify. This would suggest the possibility of further growth to the detriment of existing centres.
- 2.3 NSC also object to the supporting justification for the expansion of The Mall in Policy CS14 which suggests that the majority of this increase is to meet the needs of South Gloucestershire residents on the basis that there is a lack of capacity in other South Gloucestershire centres. This fails to take account of the need for cross-boundary strategic planning for retail provision across the West of England.
- 2.4 The West of England Delivery and Infrastructure Investment Plan (Sept 2011) which has been agreed by all West of England authorities identifies Weston town centre regeneration as a priority objective. Para 4.45 states that “**The up-grading of Weston-super-Mare Town Centre reflects the priority attached to the regeneration of Weston and enhancing its contribution to meeting sub-regional development targets**”
- 2.5 That same paragraph continues to expand on why the regeneration of Weston Town Centre is so critical “..... **The town centre has suffered from under-investment over many decades with a poor retail and employment offer given the size of Weston, leading to outflows of shoppers and commuters to the Bristol area. Up-grading the town centre and the range of retail and other services available, as well as retaining expenditure and securing additional jobs, would raise the attractiveness of Weston, improve prospects for attracting inward investment and thereby, the delivery of the planning strategy for the town. Up-grading the town centre would also complement actions to tackle the disadvantaged communities of nearby localities that are amongst the top 5% most deprived in the country. Several key development sites have**

been identified as early priorities for securing town centre regeneration and enhancing the retail offer.”

2.6 Unfortunately North Somerset Council was not party to any discussions with South Gloucestershire prior to the publication of the post-submission changes in December 2011. Cribbs Causeway has a large sub-regional catchment area crossing a number of local authority boundaries. The evidence base is unsound in that:

(i) It fails to take full account of the retail context provided by the overlapping catchments of Bristol, Bath, Weston-super-Mare and other centres;

(ii) It fails to assess retail survey evidence which examines this wider area as a whole;

(iii) It fails to take account of the need for new retail floorspace across the whole area;

(iv) It does not consider alternative options for accommodating development within other centres and assesses their implications (both in retail terms and as part of the sustainability appraisal process).

2.7 Any material changes at Cribbs Causeway will have an impact on the wider retail catchment, and particularly the West of England area. The Core Strategy will set the context for any potential retail expansion over the plan period, and must therefore take account of the wider impacts and not rely on any future planning applications to tackle this issue.

2.8 There is no doubt that Weston has suffered adverse effects from Cribbs Causeway. An analysis of the questionnaire used for the North Somerset Retail Study (2011) reveals that for many goods more than 1 in 5 shoppers in North Somerset use Cribbs Causeway/The Mall as their main location for comparison goods. For areas in North Somerset closer to Bristol the ratio is 1 in 2.

Main location for household shopping for:	Number of respondents in North Somerset who identified Cribbs Causeway/The Mall (%)
Clothes ,footwear and other fashion goods	306 (28.2%)
Furniture, floor coverings and household textiles	236 (21.8%)
DIY and decorating goods	73 (8.3%)
Domestic appliances	215 (22%)
Personal/luxury goods	256 (24.2%)
Recreational goods	127 (11.7%)
TV, hi-fi, radio, photographic and computer equipment	228 (22.9%)

Source: North Somerset Retail Study - GVA Grimley (2011)

- 2.9 A health check of Weston town centre undertaken in 2010 as part of the North Somerset Retail Study reveals that vacancy rates are 17.4% compared to a national average of 12.6%. Yield rates were being outperformed by all comparable centres and although rental levels (£85 per m² in 2009) are higher than other centres (e.g. Wells, Bridgwater) they are considerably lower than Taunton (£120 per m²) and Bristol (£200 per m²).
- 2.10 Weston town centre has not seen any major new retail investment since the construction of the Sovereign Shopping Centre in 1989. For the size of the town and its growth over the last few decades, it remains an under-performing centre that has suffered from a disappointing representation from national retailers and a generally poor quality retail offer. Its proximity to the M5 has resulted in a significant loss of trade to other centres in particular Bristol City Centre and Cribbs Causeway/The Mall.
- 2.11 However, Weston has benefited from significant regeneration and enhancement work over the last few years with remodelled sea defences and promenade, a new pier and a new formal town square which is challenging perceptions of the town as a place to visit, to shop in and invest. This has encouraged a second wave of investment on a number of prominent sites of which Dolphin Square is the most significant. Despite this activity, the emergence of a stronger retail centre in the future is still far from certain and Weston remains extremely vulnerable, particularly in the current economic climate.
- 2.12 The North Somerset Retail Study (2011) identified a shortfall of over 25,000m² of comparison goods up to 2026. The North Somerset Core Strategy in accordance with current national policy identifies that the best location for this will be Weston town centre. The current redevelopment of Dolphin Square will provide an additional increase of 4,510m² retail floorspace (8,660m² proposed replacing 4,150m² existing retail) plus 7,531m² leisure/restaurants. While the hotel and multi storey car park part of the scheme is under construction the retail element is not planned to start until early 2013. The developers are currently in negotiations with retail operators however there is concern that the proposals for The Mall will negatively impact on the ability to secure the retail occupiers.
- 2.13 The threat of an expanded Mall which will potentially attract customers as well as retailers away from Weston is a significant concern to North Somerset Council. The trade impact of -11.7% for a 35,000 m² and -18.1% for a 54,950 m² extension to The Mall (table 4.4 and 4.5 of SGC Roger Tym Retail Study Update and Impact Assessment) could seriously undermine retailer investment confidence and threaten the delivery of the re-development of Dolphin Square and any future retail schemes in the town centre.

- 2.14 Given this level of demand for additional retail floorspace in Weston and other areas in the West of England, it is clearly contrary to national advice aimed at supporting existing town centres if a large part of this demand is taken up by a large out of town car borne shopping destination.

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

- 3.1 The designation of Cribbs Causeway as a sub-regional centre or an emergent centre is inconsistent with the NPPF, which refers only to city, town, district and local centres (NPPF Annex 2: Glossary).
- 3.2 The NPPF also makes it clear that local authorities should define a hierarchy of centres in their development plans but that this should be undertaken in the context of promoting competitive town centre environments and involve impact assessments so that any unacceptable impact on centres within the catchment area can be identified.
- 3.3 The NPPF was an opportunity for the Coalition Government to change the emphasis on the “town centre first” approach set out in the now superseded PPS 4. Instead they chose to reinforce this policy approach and this does not appear to be reflected in South Gloucestershire’s Core Strategy
- 3.4 It is considered that the South Gloucestershire Core Strategy is not compliant with the NPPF because growth at Cribbs Causeway:
- (i) will direct investment away from established centres throughout the West of England. This would make them less competitive and could contribute to their decline;
 - (ii) fails to provide a basis for positive planning of town and local centres;
 - (iii) has not been properly appraised in terms of the sequential test and alternative strategies;
 - (iv) will have a significant impact on existing and planned retail investment throughout its catchment area.