



Matter No. 13 Town Centres & Retail

Hearing Date: 26 June 2012

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South Gloucestershire District Council Core Strategy

EIP Matter 13 – Town Centres and Retail (Policy CS14)

Hearing Statement prepared on behalf of BAE Systems Ltd

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1.0 Introduction

- 1.1.1 This Hearing Statement has been prepared by WYG Planning & Environment on behalf of BAE Systems with regard to the Examination of the South Gloucestershire Core Strategy. BAE Systems Ltd (BAE) land holdings include Filton Airfield and employment land to the south of airfield forming part of the existing aerospace cluster.
- 1.1.2 Representations on the emerging Core Strategy (Post Submission Changes, December 2011, have already been submitted on behalf of BAE by Terence O'Rourke on 17 February 2012. This Hearing Statement provides further representations on matters pertaining to Policy CS14, identified as Matter 13: 'Town Centres and Retail' in the Programme for the Examination (dated 25 April 2012).
- 1.1.3 For ease of reference the further evidence contained in this statement is structured in line with the four questions set out by the Inspector for Matter 13 in the Programme for the Examination:
1. Is the hierarchy and role of the various centres appropriately defined in policy CS14?
 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?
 3. Is the expansion of The Mall/Cribbs Causeway consistent with the principles set out in the Planning Framework?
 4. Are proposals for other retail provision clear, timely, deliverable and consistent with the Planning Framework?



2.0 Matter No. 13 – Town Centres & Retail

Introduction

- 2.1.1 The redevelopment of Filton Airfield represents a major opportunity to help deliver a more balanced community within the wider area, with the site offering significant potential to contributing to meeting the objectives of the Core Strategy. The comprehensive mixed use redevelopment of the airfield and land to the south, would involve a significant amount of investment to the area, providing a substantial number of homes and jobs together with complementary retail and service facilities within a new neighbourhood. Core Strategy Policy CS26 recognises the significant opportunities the airfield and new ‘Cribbs Causeway/Patchway New Neighbourhood’ will provide.
- 2.1.2 Whilst in principle BAE supports Policy CS14 they have significant concerns with regard to its current wording and its impact on the delivery of a complementary framework of centres proposed within the new Cribbs/Patchway Neighbourhood.
- 2.1.3 We set out below BAE’s further representations to Policy CS14 within the parameters of the Inspectors questions below.

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

- 2.1.4 Whilst Policy CS14 sets out the hierarchy and role of existing and new/emergent centres in the district the first paragraph of the policy implies that it relates only to existing centres. It is considered the words “and new” should be included in the first paragraph between the words “existing” and “centres”.
- 2.1.5 Policy CS14 identifies that new investment in main town centre uses will be directed into the town, district and emergent centres. The policy includes Cribbs Causeway as an emergent centre but no status is given to the emergent centres in the Cribbs/Patchway Neighbourhood. The new neighbourhood will provide a complementary hierarchy of centres to include ‘main town centre uses’. Table 3A in the supporting text to the policy acknowledges that new investment in main town centre uses will be directed to the new neighbourhood but no status or future policy protection is provided for the centres.
- 2.1.6 Accordingly, the centres within the new neighbourhood area should be identified as New Centres in Policy CS14.
- 2.1.7 When referring to the Cribbs/Patchway New Neighbourhood we note that the term ‘local centre’ is used in the supporting text to Policy CS14 (Table 3A). The new neighbourhood, comprising some 5,700 homes, is likely to provide a number of centres. The number and scale of the centres is currently being determined and is not yet defined. Accordingly, it is suggested that the term ‘local centre’ is replaced with general term ‘new centres’ in Table 3A so as not to unduly restrict the shape and form of the new neighbourhood.



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?

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

2.1.8 BAE do not raise objections to Cribbs Causeway becoming a Sub-Regional Centre. BAE do however have significant concerns relating to the ‘indicative’ distribution of comparison goods retail floorspace capacity identified in Policy CS14, specifically to Cribbs Causeway and the new neighbourhood and the potential implications this will have on the viability/deliverability of the centres proposed within the new neighbourhood.

Comparison Goods Floorspace Capacity

2.1.9 Policy CS14 identifies that provision should be made within the district for 34,000sq m net of new comparison goods floorspace by 2026. This capacity figure has been derived from evidence base document: South Gloucestershire Council Retail Study Update & Impact Assessment (December 2011) prepared by Roger Tym & Partners (SGCRS).

2.1.10 The SGCRS calculates comparison goods retail capacity for the district as a whole and then distributes it to existing centres in the district, based on: (1) the retail hierarchy; (2) capacity of existing centres; and (3) policy objectives (such as location of planned housing growth). BAE do not raise objections to the general principles/methodology of this approach.

2.1.11 The SGCRS provides an ‘indicative distribution’ of comparison goods floorspace capacity within its Table 5.1 based on the above approach. Of the 34,000sq m floorspace capacity it identifies that 20,000sq m net could be provided in the Cribbs Causeway area (including the Cribbs/Patchway New Neighbourhood).

2.1.12 The SGCRS, at paragraph 5.4, advises that further detailed analysis needs to be undertaken to establish whether each of the centres in the district can accommodate requirements for retail floorspace. It is noted in the study that the Council will do this through its Policies, Sites & Places DPD. With specific reference to the Cribbs Causeway area (including Cribbs/Patchway New Neighbourhood) the SGCRS further advises:

“It is not considered appropriate at this stage to allocate specific [comparison goods] floorspace in the wider Cribbs Causeway and surrounding area, since the specific allocations will need to be subject to more detailed master planning work [which will be adopted as an SPD].”

(SGCRS, paragraph 5.7)

2.1.13 Notwithstanding the evidence base document, Policy CS14 identifies that 18,000sq m net of the indicative 20,000sq m net comparison floorspace capacity figure for the Cribbs Causeway area is provided at the Mall.



The supporting text (Table 3A) to Policy CS14 indicates that the remaining 2,000sq m is distributed to a single centre within the Cribbs/Patchway New Neighbourhood.

2.1.14 Accordingly, there is clear inconsistency between Policy CS14 as currently drafted and the evidence base. Furthermore, there is no evidence base to support the arbitrary split in the 20,000sq m floorspace capacity figure for the New Cribbs Causeway Neighbourhood Area. Policy CS14, in this respect, is therefore considered to be unsound when tested against paragraph 182 of the NPPF.

2.1.15 BAE supports the evidence base and considers that it would be premature for Policy CS14 to allocate specific comparison goods floorspace in the wider Cribbs Causeway and surrounding area in advance of a master planning process and the adoption of it as SPD for the area. Such an approach would constrain the master planning of the area and the number and scale of complementary centres proposed in the New Neighbourhood Area.

Convenience Goods Floorspace Capacity

2.1.16 Turning to potential for new convenience goods floorspace it is acknowledged that Policy CS14 (supporting text paragraph 9.28) and the SGCRS support, in principle, the provision of additional convenience goods floorspace to meet the needs of the proposed 5,700 dwellings within the New Neighbourhood Area. Of particular note is the following advice contained in the SGCRS:

“Whilst no significant quantitative convenience need is identified [on a district wide basis] it is advised that areas of major housing growth should be supported by new centres which include convenience provision to minimise the need to travel. These convenience stores should be of sufficient size to attract a main food shop to encourage a vibrant and viable centre which will be able to support a range of uses and create a sustainable community”.

(SGCRS, paragraph 5.10)

2.1.17 Accordingly, BAE support Policy CS14 and its evidence base in so far as it relates to the provision of additional convenience goods floorspace in the new neighbourhood area.

Provision of Local Services at The Mall

2.1.18 Whilst BAE support in principle the diversification of Cribbs Causeway BAE raise concerns and objections to the provision of local retailing services at The Mall where this could compromise the delivery of new complementary centres within the Cribbs/Patchway New Neighbourhood.



- 2.1.19 Whilst the number and scale of the centres proposed in the new neighbourhood is currently being determined and is not yet defined it is certain that they will include/provide accessible local retailing and service facilities. The role and function of the centres within the neighbourhood would be complementary to the large scale retailing at Cribbs Causeway/The Mall.
- 2.1.20 It is considered that the supporting text to Policy CS14 should be reworded so as to prioritise the development of viable complementary centres in the neighbourhood area ahead of The Mall for 'local needs'.

4. Are proposals for other retail provision clear, timely, deliverable and consistent with the Planning Framework?

- 2.1.21 The NPPF (paragraph 23) identifies that in drawing up Local Plans, LPA's should define a network and hierarchy of centres that is resilient to anticipated future economic changes. As noted previously the number and scale of the centres proposed in the Cribbs Causeway/ Patchway New Neighbourhood is currently being determined and is not yet defined. It is considered that it would be premature for Policy CS14 to identify an 'indicative' future district derived retail floorspace capacity figure for The Mall in advance of the number and scale of centres in the new neighbourhood being established.
- 2.1.22 Policy CS14, as currently worded, is likely to harm the viability/deliverability of the new centres in the new neighbourhood and their resilience to anticipated future economic changes. Therefore, Policy CS14, in this respect, is considered to be unsound when tested against paragraph 182 of the NPPF.



3.0 Suggested Changes to the Core Strategy & Conclusions

3.1.1 Whilst in principle BAE supports Policy CS14, significant concerns are raised with regard to its current wording and its impact on the delivery of a complementary framework of centres proposed within the new Cribbs/Patchway Neighbourhood.

3.1.2 It is considered that Policy CS14 is re-worded/amended as follows:

- The first paragraph to read:

“The Council will work with partner organisations and the local community to protect and enhance the vitality and viability of existing and new centres in South Gloucestershire in recognition of their retail service and social functions:”

- Include the following words/row within a new sub-category “New Centres”.

<i>“Cribbs/Patchway Neighbourhood Area</i>	<i>A complementary hierarchy of centres providing a range of retail and service uses”</i>
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- The second and third paragraphs to read:

“New Investment in main town centre uses will be directed into the town, district, new and emergent centres, consistent with the scale and function of the centre, including making provision for 34,000sq m net of new comparison floorspace by 2026 to meet the needs of the communities in South Gloucestershire. ~~18,000sq m of this new floorspace will be provided at The Mall Regional Shopping Centre, with the remaining floorspace to be identified in 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 17.000sq m net of new comparison floorspace, ~~giving a total of 35,000sq m net additional floorspace provision at The Mall~~ by 2026. However, ~~30,000-12,000sq m~~ net of this floorspace 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 objective set out in Policy CS26.”

[an alternative wording to the third paragraph is to identify that 5,000sq m net of new comparison goods floorspace is permitted to come forward at The Mall in advance of the adoption of the masterplan/SPD.]

- The following sentence from Paragraph 9.26 to be deleted:

“...Consideration will be given to developing a part of this centre [Cribbs Causeway] to serve the more local needs of existing and future communities in the Cribbs Causeway area....”



- Table 3A - replace the term “*local centre*” with general term “*new centres*” [in reference to the Cribbs Patchway New Neighbourhood.

3.1.3 The suggested policy amendments are proposed on the basis that they are consistent with the evidence base and sound when tested against paragraph 182 of the NPPF.

