

PSM13

**South Gloucestershire
Core Strategy
Examination**

**Position Statement
for
Matter 13: Town Centres
and Retail (CS14)**

June 2012

Matter 13 - Town Centres and Retail

Q1 Is the hierarchy and role of the various centres appropriately defined in policy CS14?

Council response – Yes, subject to the suggested changes in Appendix A

- 1.1 Policy CS14 sets down the retail hierarchy for South Gloucestershire, updating the existing hierarchy in the South Gloucestershire Local Plan. The 10 town centres listed in the Local Plan are retained. However, their status as ‘major’ and ‘minor’ town centres has been removed, as this was terminology which originated from the Joint Replacement Structure Plan.
- 1.2 Patchway is identified as a new district centre that will be created by extending the local centre on Rodway Road to include the new facilities being provided as part of the Charlton Hayes development (as detailed in para 9.25). Town centre status is not appropriate as the centre has yet to be developed. However, para 9.25 recognises that the ‘district centre’ classification will be kept under review. It is suggested that Rodway Road is added to the description of the new Patchway district centre in Policy CS14 for clarification purposes (see Appendix A).
- 1.3 A new district centre will be required to serve the housing and employment areas in the Stoke Gifford area. This is in addition to new local centres that may be provided in the new housing areas. Details of the exact location and boundaries of this district centre will be set out in the Policies, Sites and Places DPD, with initial investigation focusing on the B&Q/Sainsbury’s development. It is suggested that the listing of this centre is removed from ‘Emergent Centres’ and reinstated under ‘District Centres’ (see Appendix A).
- 1.4 Policy CS14 lists existing local centres and parades. This list has been adapted from the table in the South Gloucestershire Local Plan. Para 9.27 recognises that additional local centres will be created to serve the New Neighbourhoods and larger housing sites.
- 1.5 The role of The Mall/Cribbs Causeway is set out in Question 2 below. This question also addresses the role of the Cribbs Causeway Retail Parks.
- 1.6 Longwell Green Retail Park will continue to be designated as out-of-centre, as will Abbey Wood Retail Park. The Council recognises that there is the opportunity to introduce a broader range of uses at Abbey Wood Retail Park. This better reflects its location close to both housing and employment areas e.g. financial services, community services, cafes, leisure, and move away from bulky goods comparison retailing, although acknowledging that retail will remain the dominant use on the site, provided that it is linked with the provision of other uses. It is accepted that the opportunity for change at the Retail Park, at least in the medium term, is limited by current lease arrangements. A recent planning permission (PT11/2290/F) has been granted for a medium sized foodstore, 2 non-food units and 3 units for A1/A2/A3 on the ground floor with D1/D2 above, together with improved pedestrian and cycling linkages, reduced parking, the creation of a public square and landscaping.
- 1.7 Further, the Council is clear that further retail proposals on the Abbey Wood Retail Park must not undermine the vitality and viability of existing centres, so this Retail Park will remain designated as out-of-centre and proposals will need to meet the sequential

and impact tests in the NPPF as appropriate. Proposals will also be required to include environmental and public realm improvements, as well as improvements to accessibility by non-car means. Suggested changes to para 9.25 to clarify this position are set out in Appendix A, together with changes to the reference to Abbey Wood Retail Park in Policy CS25 and para 12.5.

Q2 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?

Council response

- 2.1 Cribbs Causeway is currently an out-of-centre shopping and leisure area adjacent to Junction 17 of the M5, with The Mall Regional Shopping Centre at its core. As set out in Appendix B, the Council has a long held aspiration to transform the Cribbs Causeway area and make it a more sustainable location. The development of the Cribbs/Patchway New Neighbourhood provides the opportunity to deliver an integrated new community with The Mall/Cribbs Causeway functioning as its sustainable natural heart. This would involve moving part of the Cribbs Causeway retail area from out-of-centre to in-centre.
- 2.2 Notwithstanding this, the Core Strategy is not designating a new centre at The Mall/Cribbs Causeway. Para 9.26 indicates that, through the re-modelling of the Cribbs Causeway area, it is the intention to work towards creating more of a town centre character in part of the Cribbs Causeway area. However, given the time needed to achieve all the requisite component parts, any formal designation as a centre is most likely to be beyond the plan period following an assessment of the progress that has been made towards the achievement of the spatial and functional changes necessary for the area to perform as a town centre. In view of this approach, the Council recognises that it is misleading to include Cribbs Causeway as an 'emergent centre' in the hierarchy of centres listed in Policy CS14, and suggests that it should be deleted, as set out in Appendix A. Consequential changes are also suggested to Policy CS25 and para 12.6.
- 2.3 Further, the Council acknowledges that 'sub-regional centre' is not a term used in the NPPF, and that it relates to its function rather than its status. Consequently, the term 'town centre' would be more appropriate when referring to a new centre at The Mall/Cribbs Causeway, and this change is suggested (see Appendix A).
- 2.4 The Town Centres and Retail Study (Examination Library Ref: EB32) was commissioned to assess future floorspace requirements for residents of South Gloucestershire and how this floorspace could be accommodated. This involved looking at the retail hierarchy and considering whether this should be changed. The Study recognised that all the floorspace provision required could not be accommodated in South Gloucestershire's existing town and district centres:

'7.16 The existing centres with the exception of Emerson Green and Yate all have less than a 2 per cent market share of comparison goods expenditure from within the study catchment area. This limited share is a reflection of the polarisation trend whereby out of town shopping areas such as Longwell Green and Cribbs Causeway and a strong city centre in Bristol are increasingly dominant in attracting retail and other town centre uses floorspace.'

7.17 It is considered that the existing smaller centres, with the exception of Emersons Green and Yate, are no longer capable – physically, commercially or environmentally of serving a strategic function for retail, leisure and office uses. Whilst some of the centres such as Kingswood may be able to accommodate a limited increase in retail provision through redevelopment, it will not be sufficient to meet all the anticipated comparison retail floorspace. Therefore a deficiency in floorspace across the network will still exist.'

As a consequence, the position reached by the Town Centres and Retail Study was to recommend that Cribbs Causeway could meet the deficiency in the retail network, provided that it were to be converted into a fully functioning town centre well integrated into the local community and accessed in a sustainable manner with improved public transport.

- 2.5 The Core Strategy therefore identifies 18,000 sq.m., of the 34,000 sq.m. (net) of comparison floorspace to meet the needs of South Gloucestershire residents during the plan period, to be provided at The Mall/Cribbs Causeway, in tandem with working towards creating a town centre. While it has been argued by objectors that any shortfall in provision in South Gloucestershire's town centres should be met in Bristol City Centre, neither the Bristol Core Strategy nor the emerging Bristol Central AAP make any specific comparison floorspace provision. It therefore falls to the Council to make this provision and, in accordance with the evidence base, this has been identified to come forward at The Mall/Cribbs Causeway.
- 2.6 In terms of meeting wider sub-regional needs, the Core Strategy makes provision for 17,000 sq.m. (net) at The Mall/Cribbs Causeway. The Council recognises that this would have an impact on centres outside South Gloucestershire and has undertaken a Retail Impact Assessment (Examination Library Ref: EB63). While the Council also recognises that this floorspace could be provided for in Bristol City Centre, as set out above, no specific floorspace provision is being made.

Q3 Is the expansion of The Mall/Cribbs Causeway consistent with the principles set out in the Planning Framework?

Council response - Yes

- 3.1 The NPPF does not make specific reference to regional shopping centres. In respect of the expansion of The Mall/Cribbs Causeway, it is considered that the following core planning principles in para 17 of the NPPF are relevant:
- *proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
 - *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*

- *promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*

- 3.2 The background policy context to the development and iteration of Policy CS14 in respect of The Mall/Cribbs Causeway is set out in Appendix B. Policy EC6 of RPG10 (Examination Library Ref: LR4) did not propose further development at The Mall up to 2016 (the timeframe of the guidance), and envisaged that any proposals to extend or redevelop the Mall should be brought forward in a future review of regional policy. In practice that review was intended to be provided through the RS. However, the review didn't take place, and now can't happen through the RS. Any reconsideration properly falls to be undertaken by the Council as part of the Core Strategy process.
- 3.3 With specific regard to the Mall, the Council recognises that it is a key asset to the economy both of South Gloucestershire and the West of England and has operated under a floorspace growth restraint since opening in 1998. The owners of The Mall have indicated that they wish to invest to enable them to continue to perform in this key role and would prefer to do so within a locally determined planning policy framework. As the strategic planning authority, the Council has a responsibility to define the local policy framework and to keep this under review. The Council has therefore taken a responsible approach in response to The Mall owners' aspirations, and their representations to the Core Strategy, by commissioning additional technical evidence and negotiating with the owners of The Mall to find a way forward which is consistent with the principles set out in the NPPF.
- 3.4 As the policy context for The Mall has only changed recently, the Council has responded positively to understand the implications of further floorspace growth at The Mall, in accordance with the NPPF (3rd bullet point, para 17). While it appreciates the concerns that have been raised by objectors to the Post-Submission Changes, these objections are not evidence based and therefore are only assertions. The Council supports the town centre first approach to retail development set out in national policy, but recognises that in South Gloucestershire this has to be balanced with the Government's commitment to sustainable economic and business growth, as endorsed by the NPPF and the specific local situation that exists within the District, where:
- i. a large proportion of comparison floorspace is out-of-centre;
 - ii. the Mall is a key component of the local and sub-regional economy;
 - iii. the existing South Gloucestershire town centres are not capable of meeting the forecast floorspace needs of the District;
 - iv. the owners of The Mall have indicated a wish to bring new investment to the area which will bring significant economic benefits in itself, but will also provide an opportunity for the area to be re-planned as an essential part of the Cribbs/Patchway New Neighbourhood; and

v. the announcement of the intended closure of Filton Airfield has presented a significant change in circumstances and uplift for the Cribbs/Patchway New Neighbourhood.

3.5 The Council appreciates the concerns expressed about the potential impact that this would have on other centres, but is of the view that these impacts can be better managed through the bringing forward of the Core Strategy than left to, either an undefined period of further review, the outcome of which would be uncertain or determined through speculative planning applications and potentially the development of an adversarial relationship with a key employer and potential investor in the district.

3.6 Furthermore, the future role of The Mall and Cribbs Causeway retail area needs to be considered now and not deferred as it is integral to the masterplanning of the New Neighbourhood. The Council intends to guide the form and nature of further growth through the setting of pre-conditions concerning a better mix of uses appropriate to a town centre, public transport improvements and investment in supporting strategic infrastructure before any significant growth is allowed. Taking a phased approach to growth in this way also provides time for a general upturn in the economy which will be of benefit to other centres.

3.7 Taking all the above fully into consideration, the Council is of the view that the future role envisaged for The Mall/Cribbs Causeway, including further floorspace growth, is consistent with the planning principles in the NPPF, particularly the 4 listed in para 3.1 above - promoting sustainable economic development, using brownfield land, promoting mixed use development and making the area more sustainable, and would summarise this as follows:.

Promoting sustainable economic development

3.8 The expansion of The Mall/Cribbs Causeway will come forward through the re-modelling of the area away from out-of-town to more of a town centre character. It will also be delivered as part of an integrated new community where The Mall/Cribbs Causeway will function as the sustainable natural heart of that community. An element of growth is required to provide the investor commitment and necessary 'traction' for this change to happen.

Using brownfield land

3.9 The Mall/Cribbs Causeway is a developed area comprising buildings, car parking, roads and limited landscaping areas. Floorspace expansion will involve these previously developed, brownfield areas. Where, and if, further floorspace extends into the adjacent areas of Patchway Trading Estate and Filton Airfield, these are also areas of brownfield land.

Promoting mixed use development

3.10 As set out in para 3.6 above, further floorspace is linked in with the masterplanning of the New Neighbourhood and the re-modelling of the Cribbs Causeway area, and which involves a better mix of uses appropriate to a town centre.

Making the area more sustainable

- 3.11 Another objective of the re-modelling of the Cribbs Causeway area is the creation of a high quality public realm that prioritises pedestrians, cyclist and public transport over private cars.
- 3.12 The Council recognises, however, that the wording of Policy CS14 should be more explicit that the delivery of further floorspace will be plan-led and guided by the preparation, adoption and implementation of the SPD for the Cribbs/Patchway New Neighbourhood. This SPD will set out the framework for the transformation of The Mall/Cribbs Causeway area to create a town centre. Suggested changes are set out in Appendix A.

Q4 Are proposals for other retail provision clear, timely, deliverable and consistent with the Planning Framework?

Council response - Yes

- 4.1 NPPF (para 23) states that:

local planning authorities should...recognise town centres as the heart of their communities and pursue policies to support their viability and vitality.

Other than at The Mall/Cribbs Causeway, the distribution of further comparison floorspace will be between the various town and district centres and, therefore, this is consistent with the NPPF. This distribution will be defined in the Policies, Sites and Places DPD, although an indicative distribution is set out in Table 3A. The level of existing A1 retail floorspace in the town centres in South Gloucestershire ranges from around 2,500 sq.m. (net) to over 20,000 sq.m. (net) (Examination Library Ref: EB35/1). Between these centres, the total A1 retail floorspace is around 70,000 sq.m (net) (including the new floorspace at Tesco in Yate), so a further 16,000 sq.m. (net) represents a not insignificant amount of floorspace growth.

- 4.2 The Council is of the view that this floorspace growth is deliverable and that suitable sites can be identified, but acknowledges that these are likely to be edge of centre. Further, until appropriate assessments have been carried out, the Council is not in a position to be able to distribute the floorspace between centres, but recognises that a higher level of development may be more appropriate in the largest centres, particularly Yate, than is shown in Table 3A. This would also support the concern of the owners of Yate Shopping Centre that a higher level of floorspace provision is required to enable Yate to attract the investment necessary to maintain its viability and vitality.
- 4.3 Policy CS14 indicates that development in local centres/parades will be to meet local needs only, where it is of a scale appropriate to the role and function of the centre/parade, and where it would not harm the vitality and viability of other centres. This is consistent with the NPPF's objectives of encouraging sustainable economic growth, supporting sustainable local communities and minimising journey lengths.
- 4.4 The future role of Abbey Wood Retail Park is covered under Question 1. The Council acknowledges that its approach to the Retail Park is only appropriate due to its location, and the opportunity presented by new development in the area to re-focus the

park as an asset for the local working and residential communities, rather than perpetuating it as a destination for the car-borne shopper. The nearby town centres of Filton and Bradley Stoke are not sufficiently close enough to fulfil this role. Provided that development is carefully managed, the Council is of the view that the vitality and viability of existing centres would not be adversely affected and, on this basis, development would not be inconsistent with the NPPF.

- 4.5 The Council is of the view that proposals for other retail provision are clear, timely, deliverable and consistent with the NPPF.

5.0 Conclusion

- 5.1 Policy CS14 as suggested to be amended is considered to be robust and appropriate. It sets out the retail hierarchy consistent with the NPPF and provides the strategic policy framework to manage land use change within town centres and out-of-centre locations consistent with the Council's vision, spatial objectives and development strategy. Moreover, the policy sets the context for delivering the Council's transformational objective for Cribbs/Patchway New Neighbourhood, while recognising the uncertainty, and of responding positively to changing circumstances. The alternative would be to leave this considerable investment to a future undefined period, the outcome of which would be to extend the period of uncertainty, or to be determined through a speculative planning application. Neither of these courses of action are acceptable to the Council. The future role and status of The Mall needs to be addressed through the Core Strategy, with the development of the Cribbs/Patchway New Neighbourhood offering the best opportunity to direct and focus the considerable investment to fully reflect and deliver the Council's transformation vision for the area. The Inspector is respectfully asked go take these matters into consideration.

Appendix A

Suggested Modifications to Matter 13

Policy / Para	Proposed Modification	Justification	Main (M) or Additional (A) Modification
CS14 (p95/6)	Replacement policy – see below	Clarification and to better express the Council's intentions over further floorspace provision at Cribbs Causeway	M
Para 9.25	<i>At Abbey Wood Retail Park, in recognition of its location adjacent to a main line rail station, major employment and housing areas and a broader range of uses, including an element of retail, will be promoted at Abbey Wood Retail Park will be expanded and its classification as a retail park removed and away from the sale of bulky goods. The park will continue to be treated as out of centre for the purposes of national planning policy (see Policy CS25)</i>	Clarification	A
Para 9.26 (p98)	<i>At Cribbs Causeway, development comprises represents a significant area of out-of-centre development, which includes The Mall, retail parks, free-standing stores, and leisure development. The Mall is a Regional Shopping Centre which serves the retail needs of both South Gloucestershire residents and of the wider sub-region. Together with the retail parks, the Cribbs Causeway area as a whole provides a substantial proportion of South Gloucestershire's comparison floorspace. In recognition of the role which the area performs serves, and in order to maintain this role, it is the Council's intention to work towards the transforming the area by creating more of a town centre character, including new retail floorspace provision in Area 5 (as shown in Figure 6), as an integral part of the Cribbs/Patchway New Neighbourhood established under Policy CS26. This transformation will designation of the area as a sub-regional centre. New communities are to be developed in the area and will require a new town centre. This town centre will to be developed through Policy CS26 as part of the development strategy and delivered through the masterplan Cribbs/Patchway New Neighbourhood SPD for the re-modelling of the Cribbs Causeway area, with formal designation beyond the plan period. One The aim of this designation re-modelling will be to better integrate the area with surrounding communities, by introducing a mix of uses and reducing the dominance and severance caused by the current reliance on the car as the primary means for accessing and moving</i>	Clarification and to better express the Council's intentions over further floorspace provision at Cribbs Causeway	M

Policy / Para	Proposed Modification	Justification	Main (M) or Additional (A) Modification
	<u>around the area. Consideration will be given to developing a part of this centre</u>		
Para 9.28 (p100)	Beyond existing commitments, the Town Centre and Retail Study did does not identify any requirement for convenience floorspace, although it did does recognise that further floorspace was is justified where this addresses a shortfall in provision in a local area (see Policy CS30 which identifies a new food store in Chipping Sodbury). By contrast, <u>after taking account of commitments, a shortfall in comparison floorspace was is identified for the period 2016—2021 of 31,000 2011 – 2026 of 34,000 sq.m. net. However, the Study recognises that the existing centres may have neither the physical nor market capacity to accommodate this level of growth, and that the Cribbs Causeway area is a principal retail destination for residents of South Gloucestershire. Consequently, the Study's indicative distribution of future comparison floorspace assigns a significant proportion to the Cribbs/Patchway New Neighbourhood, with the recognition that the majority should come forward at The Mall and the remainder serve the new community, as shown in Table 3A below. 18,000 sq.m. net is identified to come forward within the Area 5 as shown on Figure 6. The Sites and Policies, Sites and Places Development Plan Document will distribute this the other floorspace in Table 3A between townz and and district and emergent centres, identify sites, define town centre and primary retail area boundaries and define primary and secondary frontages.</u>	Clarification and to better express the Council's intentions over further floorspace provision at Cribbs Causeway	M
Para 9.28a (P100)	<u>In recognition of the dual role of The Mall as both a local and sub-regional comparison shopping destination, provision will be made for a further 17,000 sq.m. net of new comparison floorspace to serve its wider catchment area within Area 5 previously referred to. The total additional floorspace provision within atThe Mall/Cribbs Causeway area between 2011 and 2026 will therefore be 35,000 sq.m. net. This is the maximum floorspace appropriate without significantly affecting the vitality and viability of Bristol City Centre or prejudicing further investment in this City Centre. However, the delivery of this floorspace, other than 5,000 sq.m. net, will be linked in with plan-led, guided through the masterplanning for a re-modelled Cribbs Causeway area as set out in the place-making objectives of Policy CS26 and the Cribbs/Patchway New Neighbourhood SPD and will not be approved until the adoption of the masterplan and the imposition of</u>	To better express the Council's intentions over further floorspace provision at Cribbs Causeway	M

Policy / Para	Proposed Modification	Justification	Main (M) or Additional (A) Modification
	appropriate conditions and obligations to secure the objectives of the masterplan set out in Policy CS26. Further, in order to keep the impact of floorspace growth in Area 5 under review, full retail impact assessments will be required for any planning application which, either alone, or cumulatively with previously approved applications, would exceed 20,000 sq.m. net of new comparison floorspace provision.		
Para 9.30 (P101)	This policy will be delivered through the development management process. The delivery of floorspace at <u>The Mall/Cribbs Causeway</u> will be linked with the masterplan /SPD for the Cribbs/Patchway New Neighbourhood as set out in Policy CS26.	Clarification	M
CS25	4a. <u>Support the diversification of Cribbs Causeway area to create a sustainable mixed-use area to serve residents of South Gloucestershire and the wider area, in accordance with Policy CS14 and Strategic Site Policy CS26 and the subsequent designation of a sub-regional centre;</u>	Clarification	M
CS25	5 Enhance the vitality of the Abbey Wood Retail Park by providing a broader range of uses, <u>including an element of retail</u>, that capitalise on its location adjacent to a main line rail station, and creation of a new people orientated public space;	Clarification	A
12.5	Amend 2 nd sentence New residential neighbourhoods, the remodelling of the Abbey Wood Retail Park away from bulky goods retailing and the redevelopment of parts of a number of sites, such as the Abbey Wood Retail Park and the University of the West of England Campus provide an opportunity to improve the range of local amenities services and facilities on offer, create new distinctive public spaces <u>and associated places to meet and socialise</u> and improve both the extent and attractiveness of walking, cycling, and public transport connections.	Clarification	A
12.6	A wider range of uses are provided at the Cribbs Causeway retail <u>retail</u> area to recognise and maintain its existing role as a <u>sub-regional centre</u> and to develop its role as <u>contribute towards its aspiration to become a town centre focus for the New Neighbourhood</u> and existing communities nearby;	Clarification	M

POLICY CS14 - TOWN CENTRES AND RETAIL	
The Council will work with partner organisations and the local community to protect and enhance the vitality and viability of existing centres in South Gloucestershire in recognition of their retail, service and social functions:	
Centres	Role & Function
Town Centres	
Bradley Stoke	Town centre
Emersons Green	Town centre. Opportunity for expansion to serve new housing
Kingswood	Larger High Street shopping and service centre
Thornbury	Market town
Yate (including Station Road)	Market town
Chipping Sodbury	Market town
Downend	High Street shopping and service centre
Filton	Convenience shopping and services centre
Hanham	High Street shopping and service centre
Staple Hill	High Street shopping and service centre
District Centres	
Patchway (new)	New centre to be developed by extending the existing local centre on Rodway Road to support Charlton Hayes development
Sainsbury's/B&Q, Stoke Gifford (new)	New centre to be investigated to serve the Stoke Gifford, Harry Stoke, UWE and Cheswick village area
Local Centres & Parades	

<p>49 Centres/Parades (listed in Table. 3)</p>	<p>Provide local level services</p>
<p>New investment in main town centre uses will be directed into the town and district centres, consistent with the scale and function of the centre, and to Area 5 at Cribbs Causeway in accordance with Policy CS26 (see Figure 6).</p> <p>This investment will include making provision for 34,000 sq.m. net of new comparison floorspace by 2026 to meet the needs of the communities in South Gloucestershire, 18,000 sq.m. of which will be provided within Area 5 at Cribbs Causeway. The remaining floorspace will be identified in the Policies, Sites and Places Development Plan Document.</p> <p>In recognition of the wider catchment that The Mall serves, provision will be made for an additional 17,000 sq.m. net of new comparison floorspace, giving a total of 35,000 sq. m. net additional floorspace provision within Area 5 at Cribbs Causeway by 2026.</p> <p>Proposals for new retail floorspace within Area 5 will be required to demonstrate that they are in accordance with the Cribbs/Patchway New Neighbourhood SPD and the place-making objectives set out in Policy CS26.</p> <p>Full retail impact assessments will be required for any planning application within Area 5 which, either alone, or cumulatively with previously approved applications, would exceed 20,000 sq.m. net of new comparison floorspace provision.</p> <p>Development in local centres/parades will be to meet local needs only, of a scale appropriate to the role and function of the centre/parade, and where it would not harm the vitality and viability of other centres.</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> • Identifying in the Policies, Sites and Places Development Plan Document centre boundaries, primary shopping areas, shopping frontages, and development opportunities in accessible locations within and on the edge of centres; • Encouraging retail, commercial, leisure and cultural development within a centre of an appropriate type and scale commensurate with its current or future function; • Safeguarding the retail character and function of centres by resisting developments that detract from their vitality and viability and protecting against the loss of retail units; • Applying the sequential approach when considering proposals for new town centre uses; • Requiring impact assessments for edge-of-centre and out-of-centre proposals with a floorspace over 1,000 sq.m. gross; • Encouraging convenient and accessible local shopping facilities to meet the day to day needs of residents and contribute to social inclusion. <p>Shops and services, both in urban and rural areas, are also safeguarded from loss under Policy CS13.</p> <p>Development proposals outside Area 5 at Cribbs Causeway and at Abbey Wood and Longwell Green Retail Parks will be treated as out-of-centre and will need to satisfy the sequential test. The future role of</p>	

Abbey Wood Retail Park is addressed under Policy CS25.

Appendix B

Background to the Policy Approach to The Mall and Cribbs Causeway

Cribbs Causeway Area

1. Cribbs Causeway is currently an out-of-centre shopping and leisure area adjacent to Junction 17 of the M5, with The Mall Regional Shopping Centre at its core. The first stores opened in the 1970s and the area has grown and expanded in a piecemeal fashion over the years, as a predominantly car based destination. The Mall itself opened in 1998.
2. The Cribbs Causeway area is shown on Map 1 and is made up of the following:
 - The Mall Regional Shopping Centre (66,000sq.m. floorspace)
 - Retail Parks (60,000sq.m. floorspace)
 - Asda and Morrisons supermarkets (12,000sq.m. convenience floorspace)
 - The Venue leisure area
 - An area which includes car showrooms and Makro.

Cribbs Causeway comprises about half of the total retail floorspace in South Gloucestershire and performs a significant role in retail provision, both for the District, the sub-region and beyond. There are approximately 7,000 free parking spaces at The Mall and a further 5,000 free spaces at the retail parks and foodstores.

3. The Mall/Cribbs Causeway retail area is a key asset to South Gloucestershire, which is recognised and supported by the Council. The Mall itself employs 8,000 people and is a major component of the local and sub-regional economy.
4. Through the policies in the South Gloucestershire Local Plan, the Council has sought to improve accessibility and connectivity, both to and around Cribbs Causeway, to address some of the issues arising from its car dependent location. The area is now well served by bus routes, including two Greater Bristol Bus Network routes which connect Cribbs Causeway with Bristol City Centre and elsewhere in the North Fringe of Bristol. There is a bus station at The Mall, which performs as a public transport interchange/hub, and coach parking facilities. The area will be served by the Hengrove to North Fringe Rapid Transit route, providing further connections to the North Fringe of Bristol, Emersons Green, Bristol City Centre and beyond.
5. However, the area is still somewhat segregated from residential areas, due to surrounding employment areas and Filton Airfield, and as a result of the area's historical market-led location as an out-of-centre retail area, which has led to a domination of this single use over an extensive area. Therefore, pedestrian and cycle access remains limited. Notwithstanding this, the Council has had a long standing ambition to better integrate the Cribbs Causeway area with neighbouring residential communities and for the area to recognise its potential as a multi-dimensional centre for the surrounding area. This aspiration is expressed in paragraphs 9.83 – 9.86 of the South Gloucestershire Local Plan.

6. Preparation of the Core Strategy has occurred at the time of changing national economic circumstances and planning policy. The Council's approach to retailing at Cribbs Causeway and The Mall has, therefore, been to respond positively to these circumstances and the wider opportunities for, and benefits of, growth and be aspirational but realistic.

Pre-Submission Core Strategy

7. At the time of drafting the Pre-Submission Core Strategy, the policy context for The Mall and Cribbs Causeway retail area was defined by PPS4, RPG10, the emerging RS and the Joint Replacement Structure Plan. RPG10 (Examination Library Ref: LR4) did not propose further development at The Mall up to 2016 (the timeframe of the guidance), and envisaged that any proposals to extend or redevelop the Mall should be brought forward in a future review of regional policy. In practice that review was intended to be provided through the RS. However, as outlined below, this review didn't take place, and now can't happen through the RS, so any reconsideration properly falls to be undertaken by South Gloucestershire Council as part of the Core Strategy process.
8. The 2006 Draft RS (Examination Library Ref: LR8) reflected the 'town centre first' approach of national policy, advising that proposals for facilities at out-of-centre locations should follow the sequential approach, and should not be detrimental to regeneration or town centre vitality and viability. It did not reconsider further development at The Mall. It did, however, recognise that opportunities for redevelopment in the Cribbs Causeway retail area would need to be investigated to enhance its role as a centre for local communities in the light of planned development.
9. Following consideration at the Examination in Public of the Draft RS guidance on out-of-town retail provision, particularly in respect of Cribbs Causeway, the Panel concluded that the RS should provide greater clarification on the planning of retail centres outside the main strategic centres. In their view the future of the Cribbs Causeway area should be dealt with as part of the wider network of centres that could be expected to be needed to serve the proposed urban extensions in the Greater Bristol conurbation and that, given the scale of the Cribbs Causeway retail facilities, focus should be placed on the establishment of a balanced network of centres around this conurbation. As a consequence, the Panel recommended the introduction of a new policy, which was subsequently endorsed in the Secretary of State's Proposed Changes (Examination Library Ref: LR8/3). This policy (Policy TC2) established the principle that the strategic extension of the major shopping area at Cribbs Causeway would not be supported. Both the Panel and the Secretary of State, however, endorsed the intention expressed in the Draft RS for redevelopment within the Cribbs Causeway retail area to meet local needs but not to the scale of a town centre. Little weight however should be afforded to Policy TC2 as the context for this policy has changed.
10. At the sub-regional level, the Joint Replacement Structure Plan (Examination Library Ref: LR5) recognises that the Cribbs Causeway retail area competes with trade for Bristol and other city and large town centres, but does not offer the sustainability benefits of these established centres. Consequently, further retail development at Cribbs Causeway is only acceptable where it would satisfy the sequential test in national policy and improve the sustainability of the area, by providing significant improvements to public transport, not adding to traffic congestion, not increasing car use and improving opportunities for circulation within the area other than by car.

11. In summary, while the emerging RS supported some redevelopment of the Cribbs Causeway retail area to meet local needs, it was clear that this did not include any extension of the retail area, as this should be dealt with as part of the wider network of centres that could be expected to be needed to serve the proposed urban extensions being promoted in the RS for the Bristol area. Further, any change to the network and hierarchy of centres, and to the distribution of regional floorspace requirements, were matters to be considered at a regional level.
12. In preparing the Core Strategy, the Council commissioned a Town Centres and Retail Study (Examination Library Ref: EB32). The main objective of the Study was to assess future floorspace requirements for residents of South Gloucestershire and how this floorspace could be accommodated. The Study recommended that:
- “Our view is that the majority of the requirement should go to areas and centres with the most potential for growth and development.”* (Vol1 para 7.39)
- “Cribbs provides an opportunity to accommodate a large proportion of the identified floorspace need in South Gloucestershire. The configuration of the Mall, surrounding car parking and the retail warehouses all provide options to enable the creation of a town centre which is supported by a public transport system and improved linkages between existing office and residential areas and the new proposed areas for housing growth.”* (Vol1 para 7.93)
- “The current role as a regional shopping centre can be potentially evolved to provide wider ranges of services and a transport system with less reliance on the car. The eventual aim should be the creation of a town centre, promoting a sustainable pattern of development and meeting the needs of South Gloucestershire. However, as previously discussed a change in status will need to be promoted at a regional level.”* (Vol 1 para 7.90)
13. Policy CS14 in the Pre-Submission Core Strategy (Examination Library Ref: SD1) reflected the higher level policy context of no expansion of the retail area at Cribbs Causeway, but made reference to the preparation of a development strategy for Cribbs Causeway, which would consider further floorspace growth, and to a possible town centre designation as a longer term aspiration. The expectation was that any change in status would be progressed through a review of regional policy, an approach that was supported by the Town Centres and Retail Study. The expectation of the Study was that the Council should seek to change RS Proposed Changes Policy TC2 to allow for more retail growth in the long-term at Cribbs Causeway, through the setting of a floorspace target, together with agreement on the criteria which would need to be satisfied before this floorspace could become operational. However, until such time as there was a clear route in policy and defined pre-conditions for re-designating Cribbs Causeway, or a part of Cribbs Causeway, as a town centre, it was inappropriate to formally allocate such or allow for any retail growth. Therefore, although Policy CS14 identified an overall quantum of floorspace growth for South Gloucestershire, there was no guidance on distribution.
14. Objections were received from the owners of The Mall, covering the following issues:
- that the role envisaged for Cribbs Causeway and The Mall is not clear;
 - that the scale of retail floorspace projected for Cribbs Causeway in the Council’s Town Centres and Retail Study understates need; and
 - that a quantum figure for additional retail floorspace at The Mall should be included now within Core Strategy policy.

Proposed Changes December 2010

15. The implication of the Government's announcement of their intended revocation of regional strategies was a retail policy vacuum concerning the future of Cribbs Causeway, as matters previously for regional strategies would be devolved down to individual local planning authorities. At the time though it was not known how the forthcoming NPPF would address this policy vacuum, so, in publishing Proposed Changes to the Core Strategy in December 2010, Proposed Change PC100 introduced some scope for further floorspace growth at The Mall, subject to particular safeguards: national policy, maintaining vitality and viability of The Mall and other centres, the needs of the local population, and other policies in the Core Strategy.
16. The owners of The Mall remained of the view that the Core Strategy didn't provide the certainty needed about further development at The Mall or about the future role of Cribbs Causeway, including The Mall. Their agents (NLP) submitted additional evidence in December 2010 (Examination Library Ref: EB64) to support their objection for a substantial level of floorspace growth at The Mall. Using customer exit surveys at The Mall in June 2008 and June 2010, this report established, firstly, that the trade draw from the catchment area of the Town Centres and Retail Study represented less than half of the total trade draw and, secondly, that the trade draw from this catchment area had fallen from 47% to 42% over the two year period of the exit surveys. The main reason advanced for this loss of trade was competition from the Cabot Circus shopping centre, which opened in Bristol City Centre in September 2008.
17. The NLP Report also used the exit survey data to understand the wider catchment area and to examine the capacity for growth at The Mall, assuming that The Mall maintained a similar level of market share. From this assessment they concluded that around 50,000 sq.m. (net) of additional comparison floorspace could be supported at The Mall between 2011 and 2026, of which 11,000 sq.m. (net) could be supported by 2016, 18,000 sq.m. between 2016 and 2021, and 21,000 sq.m. between 2021 and 2026.
18. Given this evidential led challenge to the emerging Core Strategy, the Council took further advice from RTP/HollissVincent on the quantum figure of 50,000 sq.m. (net) set out in NLP's report. In their July 2011 report (Examination Library Ref: EB65), RTP/Hollissvincent had no major issue with the methodology used to generate the quantum figure, but did have some concerns over the assumption that The Mall would continue to maintain its market share. In their view they considered 30,000 – 40,000 sq.m. (net) of comparison goods floorspace at The Mall, or as an extension to it, could be justified to 2026.
19. However, they advised that it was important to ensure that any new retail development in the period up to 2016 was relatively small in scale, probably amounting to no more than 5,000 sq.m. (net), with any major development occurring after 2016 once the future strategy for The Mall and the wider Cribbs Causeway area had been established. This approach was consistent with the earlier Town Centres and Retail Study and the emerging Policy CS14.

20. Further, given the changes happening to regional planning, RTP/Hollissvincent now took the view that the Core Strategy should define the future role of The Mall and wider Cribbs Causeway area and recommended that the Council:
- *provide official recognition of the unique role performed by The Mall in serving a local and sub-regional function, perhaps designating part of Cribbs Causeway as a town centre, but subject to a number of pre-conditions being met, the most important of which would be the need to secure a more balanced mix of town centres uses, improvements in public transport, improvements in the public realm and possibly the introduction of car parking charges;....*
 - *identify the wider Cribbs Causeway area as a strategic site for the purposes of PPS12.” (para 5.3)*
21. They recognised the flexibility introduced into Policy CS14 by the Proposed Changes, but considered that the policy was potentially too restrictive in relation to the medium and long term development of retail and other town centres uses at The Mall, and that this might frustrate the delivery of infrastructure that would be funded, in the main, by the private sector.
22. The Council was, therefore, in the position in mid 2011 where its evidence base was supportive of NLP’s objection, in so far as the Core Strategy neither recognised the sub-regional role of The Mall nor made sufficient provision for further floorspace growth to serve this wider catchment.

Post-Submission Changes

23. Not only is it appropriate for the Council to consider the future role of the Cribbs Causeway area now with the changing policy context, there are 3 other reasons as well:
- i. To respond positively to the Inspector’s suggestion that the Council takes the opportunity with the suspension of the Examination to seek to reduce the number of issues where there is a difference in view between the Council and objectors;
 - ii. Redevelopment of Filton Airfield will provide 50ha of employment land and will more than treble the planned future population of the Cribbs/Patchway New Neighbourhood, introducing 5,700 new homes into the immediate area of Cribbs Causeway. The retail, service and leisure requirements of this new community and the existing surrounding employment and residential areas will need to be met in a plan-led manner; and
 - iii. The opportunity to achieve the Council’s long held aspiration to transform the Cribbs Causeway area has to be taken now to ensure it is integral to the masterplanning of the New Neighbourhood. To attempt to bring forward the Council’s vision for The Mall/Cribbs Causeway as a separate process, that is taken either in parallel with, or worse sequentially with, the development of the new neighbourhood would, at best, risk that only a substantially sub-optimal solution would be achieved and, at worse, risk a perpetuation of the existing situation. The opportunity to deliver an integrated new community with The Mall/Cribbs Causeway functioning as the sustainable natural heart of that community is a substantial prize, which can only be delivered in a coordinated way.

24. The suspension of the Core Strategy Examination provided an opportunity for the Council to commission a Retail Impact Assessment of further floorspace growth at The Mall, looking at the wider catchment area. Roger Tym & Partners (RTP) were commissioned to undertake this work and they reported in December 2011 (Examination Library Ref: EB63). This assessment used data from existing shopping studies and didn't factor in any growth in floorspace provision in any of the competing centres over the period to 2026, which would reduce any potential impacts from The Mall. Consequently, the likelihood is that it overstates the potential impacts on competing centres. To address this the Study recommended that any planning applications for the expansion of The Mall should be accompanied by a full retail impact assessment, including a survey of shopping patterns in the wider area, an assessment of the vitality and viability of relevant centres, and a cumulative impact assessment. This provides additional assurance that the impacts of existing centres will be re-assessed prior to any expansion being allowed.
25. The Retail Impact Assessment tested four floorspace growth scenarios for The Mall – 20,000 sq.m. (net), 30,000 sq.m. (net), 35,000 sq.m. (net) and 55,000 sq.m. (net). The centres tested for impact were the city/town centres of Bristol, Bath, Weston-super-Mare, Cheltenham, Gloucester, Taunton, Bridgwater and Swindon. The exercise provided an indication of the likely retail impact of an extension to The Mall. Under all four scenarios, the main impact would fall on Bristol City Centre and Weston-super-Mare Town Centre. The report responsibly recognised that the level of impact for the highest floorspace scenario is of concern, while the levels under the two mid range floorspace scenarios may be of concern. The potential impacts of a 35,000 sq.m. (net) growth in floorspace at The Mall are:
- Bristol City Centre 8.7%*
- Weston-super-Mare Town Centre 11.7%*
- Bath City Centre 3%*
- Bridgwater Town Centre 2.6%*
- Other Centres in the Assessment 0 – 0.4%*
26. Setting to one side the position with regional planning, there were new reasons for the Council to give further consideration to the objections from NLP – the Government's commitment to economic growth and supporting businesses with the publication of the 'Plan for Growth'; a clear statement from the owners of The Mall that they are seeking expansion (Examination Library Ref: EB66/1); and the lack of a policy framework for out-of-centre regional/sub-regional shopping centres in the draft NPPF. With the publication of the Localism Act, the revocation of regional strategies has now been confirmed, although the actual enactment date has not yet been set. The responsibility for the creation of a new town centre at Cribbs Causeway therefore falls to the Council.
27. The Council has carefully considered this new responsibility and formed the view that there are essentially two approaches that could be taken: one approach could be to defer consideration of any further growth at The Mall/Cribbs Causeway, and the potential to develop a new centre, to a future time period. While this might, in part, address concerns expressed by some representations made to the Council's approach in the Core Strategy, this would inevitably significantly extend the period of uncertainty

surrounding the development of a policy framework for the future scale, form and function of any development at The Mall/Cribbs Causeway. This uncertainty would not only be detrimental to the strategic investment decisions required to be made by The Mall's owners, but it would push the shared aspiration to make progress towards transforming the area to create a new centre into a further undefined period of limbo. It would also bring into question how the required floorspace to meet the needs of South Gloucestershire residents would be delivered:

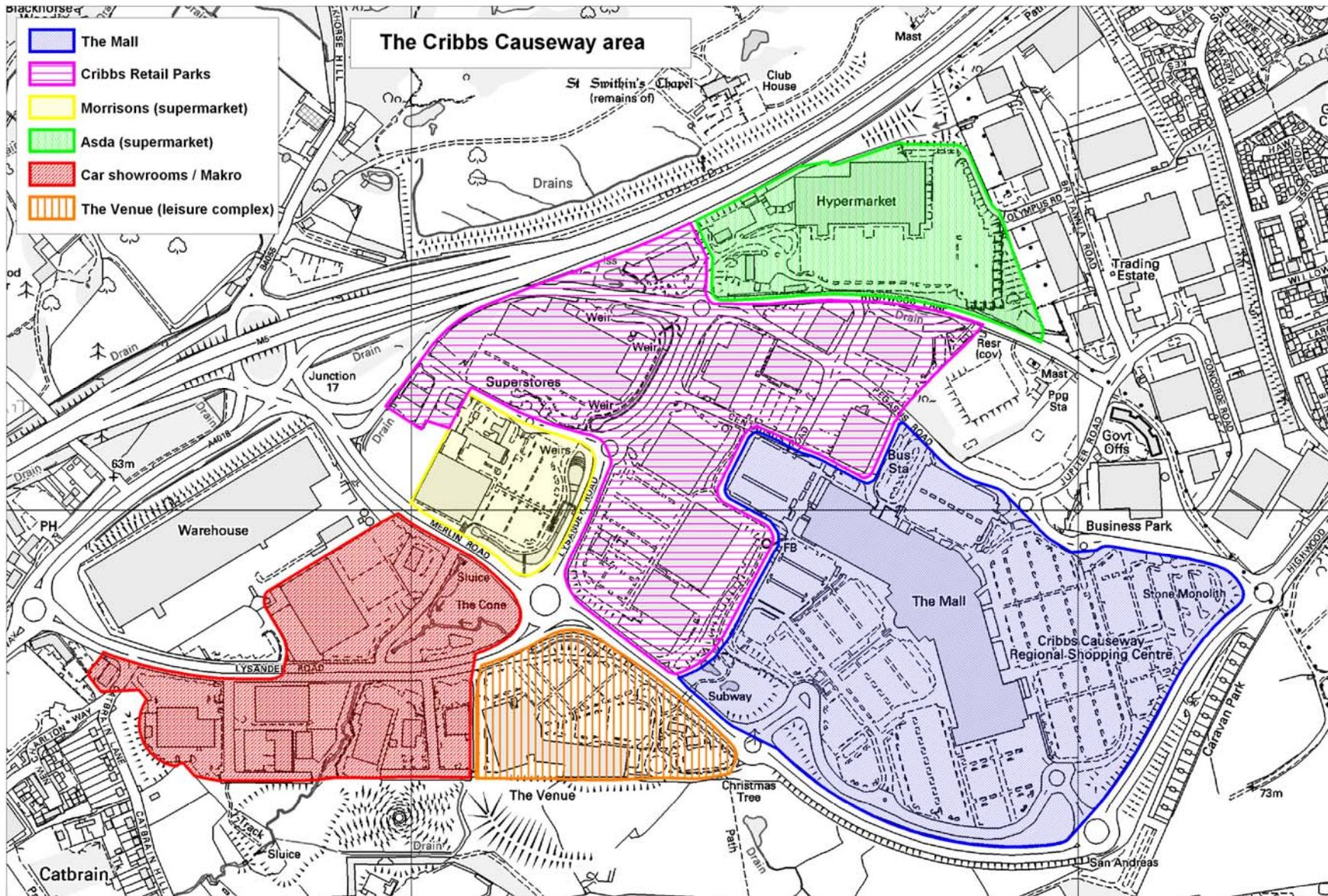
“There is a planning policy dilemma related to the future role of retailing at Cribbs Causeway and the Mall and to a lesser extent at Longwell Green and Abbeywood/Filton. This is because these out of centre facilities account for a high proportion of comparison goods expenditure. However, the policy presumption is that retail development should be located in town centres where existing market shares would not justify the scale of development suggested. Furthermore, there may be neither physical nor market capacity to enable a high level of town centre development. Thus the issue raised is whether we seek to allow existing market trends to continue to dictate the location of retail floorspace and therefore what measures need to be in place to create the right conditions for change” (Town Centres and Retail Study, Vol1 para 7.10).

28. The approach which the Council has taken is to plan positively for the development and infrastructure which will be needed to support its vision for a sustainable new community at Cribbs Causeway/Patchway. In doing so the Council is rising to the challenge to proactively drive and support sustainable economic development in this part of the district. Accordingly, the Core Strategy sets the strategic policy framework for working towards the creation of a new centre at Cribbs Causeway. This is because the Core Strategy recognises the Cribbs Causeway retail area needs to change and the repositioning of the central area around The Mall is a key component to the emerging vision for the Cribbs/ Patchway New Neighbourhood. The Council's approach therefore is to recognise that the transformation programme cannot be deferred, it is integral to the masterplanning for the New Neighbourhood, and that an element of growth is required to provide the investor commitment and necessary 'traction' for this change to happen and to meet comparison floorspace needs for South Gloucestershire residents.
29. Further, while Policy TC2 in the Proposed Changes to the RS applied the principle of restraint to the Cribbs Causeway retail area, this was because the future of the Cribbs Causeway area was to be considered as part of a wider balanced network of centres that could be expected to be needed to serve the proposed urban extensions in the Greater Bristol conurbation. This network of centres is, however, no longer required as the proposed urban extensions are not provided for in the Core Strategies of the other 3 local authorities in the West of England. Therefore, as referred to above, since the context has changed, little weight can be given to this policy.
30. The Core Strategy, therefore, will define the vision for the wider Cribbs Causeway area, and set out the pre-conditions to be met in re-modelling the area before any formal designation can take place. Any designation will, however, not occur before 2026. The Council's approach has been to work pro-actively with the key landowners at Cribbs Causeway, and other stakeholders, to bring forward this positive vision and strategy, and the route map by which it will be delivered, which will then be translated into SPD, with policy confirmation in the Policies, Sites and Places DPD.
31. The Council has taken the view that 35,000 sq.m. (net) of floorspace growth at The Mall represents an appropriate balance between impact on competing centres and the

level of retail investment necessary to support the infrastructure provision required to help achieve the transformation of the Cribbs Causeway area into a new centre. Of this, 18,000 sq.m. would be to meet the needs of South Gloucestershire residents, with the remaining 17,000 sq.m. to meet the wider needs of the sub-region.

32. Although the potential impact on Weston-super-Mare Town Centre is approaching 12%, this centre is 25 miles/40km from Cribbs Causeway. Also the North Somerset Core Strategy provides for 14,000 new homes to 2026, which will both support the existing retail provision and may generate a need for further retail floorspace in Weston. Likewise, Bristol's Core Strategy makes provision for a minimum housing growth figure of 26,400. Further, as indicated in para 24 these potential impacts assume that there will be no further growth in comparison floorspace between now and 2026.
33. In identifying floorspace growth at The Mall, Policies CS14 and CS26 link this growth in with the transformation of the Cribbs Causeway retail area and the creation of a new centre, as the Council is clear that this floorspace growth can only come forward in this phased way, which would see The Mall moving from being out-of-centre to, in the longer term, being in-centre.

MAP 1



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