

Examination Hearing Statement Plymouth and South West Devon Joint Local Plan – Matter 7

On behalf of: Drake Circus Limited Partnership (ID: 893484)

Date: 5 January 2018

Background

This Statement supplements the written representations made on behalf of Drake Circus Limited Partnership, wholly owned by British Land Company PLC ("British Land"), to the Examination in Public of the Plymouth and South West Devon Joint Local Plan 2014-2034.

For ease, a short summary of representations dated 26 April 2017 to the Regulation 19 consultation is provided below. Following this summary, and where relevant British Land, we seek to address the questions raised within "*Matter 7 Policy Area Strategies: Plymouth*", scheduled to take place on Tuesday 6 February 2018.

Summary of representations

British Land has engaged with Plymouth City Council ("PCC") throughout the Local Plan process, having submitted representations in August 2016, December 2016 and April 2017. Prior to the Joint Local Plan, British Land responded to consultations on the Plymouth Plan in March 2015 and January 2016. In 2012, British Land attended the examination of the Derriford and Seaton AAP, to allocated Derriford as a new district centre.

British Land own Drake Circus Shopping Centre and have demonstrated their commitment to continued invested in the leisure extension of the Drake Circus Shopping Centre at Bretonside, which has now commenced development, and the recent purchase of the New George Street block adjacent to the Shopping Centre.

New George Street

With the purchase of the New George Street block, British Land are reviewing opportunities for site allocation PLY8 (Land at Royal Parade). Accordingly, British Land supported the proposed allocations for mixed used retail-led development and note that PCC has incorporated the site allocation within the 'City Life' theme, as previously recommended. Policy PLY8 was largely supported, although detailed wording amendments to reflect the ambition of British Land in sensitively enhancing the shopfronts and canopies was sought.

Primary Shopping Area

The Primary Shopping Area had not been included within the Planning Policy Map. This was first identified in March 2017 within the Review of City, District and Local Centres in Plymouth for the JLP (EC11). British Land consider that the proposed boundary should be amended to include Drake Circus Leisure at Bretonside and the 'Jigsaw Site' to the north of the Shopping Centre.

Derriford

British Land has maintained that any future development at Derriford, including a new commercial centre as part of the growth corridor, should only serve the new and existing residential communities, it should not have a large or city-wide catchment area. Non-food shopping and leisure floorspace should be limited to a scale and type which will not result in a significant adverse impact (including when assessed cumulatively) on the vitality and viability of, and investment in, the Plymouth City Centre.

Detailed wording to control the scope and potential impact of Derriford was proposed by British Land in relation to Policies SPT5, PLY38 and DEV16. In relation to Derriford, British Land support the recommendation of a policy test but seek controls in maximum retail floorspace, the maximum split between convenience and comparison retailing, a maximum floorspace for complementary units, and other retail floorspace restrictions in relation to high order comparison shopping and the future amalgamation of units.

Plan making

Paragraph 182 of the National Planning Policy Framework states that in order for Local Plans to be ‘Sound’ they must be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with national policy.

This Statement identifies the amendments which are required for the Local Plan to be found Sound. This Statement only references questions and issues which are relevant to British Land’s representations.

Matter 7 Policy Area Strategies: Plymouth

The main issues are identified as:

"Does the JLP provide a robust framework for the delivery and management of development across the Plymouth Policy Area (PPA) that is justified, effective and consistent with national policy?"

(Note: Housing site allocations within the PPA will be considered under section 7.6 ‘Housing delivery within the PPA’)”

7.1 The PPA strategic role (Policies PLY1-PLY5)	Response
<p>i. Is it clear how development proposals in the PPA will be assessed against policies PLY1, PLY2 and PLY3? Is the focus of development within the City Centre and Waterford Growth Area, the Derriford and the Northern Corridor Growth Area and the Eastern Corridor Growth Area within the PPA (Policy PLY2) justified and consistent with the overall spatial strategy?</p>	<p>British Land support the focus of development within the City Centre, as required by the NPPF and recommended in the Retail Study 2017 (EC9). Policies should reflect that the City Centre is the primary location for major comparison goods retailing, commercial leisure and office development and that protection should be provided through sequential and impact assessments.</p> <p>In order to fully justify the proposed development at Derriford, it is necessary to set out the requirements of the proposed district centre in a strategic masterplan.</p>

7.2 City Centre and Waterfront Growth Area (Policies PLY6-PLY37)	Response
<p>iii. In relation to the site allocations proposed for employment, retail, leisure and other commercial development within this growth area (housing site allocation questions are in 6.6 below):</p> <ul style="list-style-type: none"> a. Is the type and amount of such development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure? b. Is the development deliverable in the timescales envisaged? c. Do relevant site allocation policies take appropriate account of issues including design and the historic environment? 	<p>British Land note PCC's response to the representations of April 2017 (SUB22B) and that 'complementary' uses, as set out in Policy PLY8 will include both residential uses and main town centre uses. It is also recognised that the 'City Life' theme has been introduced to the policy.</p>

7.3 The Derriford and Northern Corridor Growth Area (Policies PLY38-PLY41 and PLY43-PLY47)	Response
<p>i. In relation to the site allocations proposed for employment, retail leisure and other commercial development within the Derriford and Northern Corridor Growth Area (housing site allocation questions are in 6.6 below):</p> <ul style="list-style-type: none"> a. Is the type and amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure? b. Is the development deliverable in the timescales envisaged? 	<p>The proposed district centre at Derriford would include an, as yet, undefined amount of retail floorspace. The Retail Study (EC9) makes it clear that this should be of a type and amount which does not have a significant adverse impact on the City Centre. It should meet the qualitative need for the centre only and the scale and type of retail provision should be assessed and consulted upon as part of a strategic masterplan. Clarification on quantum of proposed retail floorspace within the Derriford district centre is necessary to ensure that it is adequately justified.</p>
<p>ii. Is the location of the new district centre – Derriford commercial centre – in Policy PLY38 justified? Is it necessary for the policy to include reference to retail impact assessment and sequential test thresholds set out in Policy DEV16?</p>	<p>British Land recommend, as accepted by PCC, that the (500 sqm) figure set out in Policy DEV16 in relation to retail impact assessment and sequential test thresholds, should be included in Policy PLY38 for completeness.</p> <p>It is necessary for this policy to be effective, as proposals at the District Centre could otherwise be unrestricted – if development is within a defined centre and in line with</p>

	<p>policy, neither an impact assessment or sequential assessment would be automatically be required. For the proposed policy test to be effective, and in order to assess any impact on the City Centre, this certainty is required.</p>
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