

PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN 2014 – 2034 EXAMINATION

MATTER 7 POLICY AREA STRATEGIES: PLYMOUTH

PEGASUS PLANNING GROUP ON BEHALF OF: CO-OPERATIVE GROUP FOOD LTD

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Matter 7 Policy Area Strategies: Plymouth

Main issue - 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)

7.1 (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?

The Co-op is supportive of the identification of local centres in the Development Plan as opposed to the 2012 Shopping Centres SPD. However, the Co-op are concerned about the introduction of a District Centre at Derriford that contains a new supermarket without the introduction of wording in the policy to reflect appropriate phasing and the timings of its delivery, when the evidence suggests there is no quantitative need for the floorspace until after 2026. We also dispute the introduction of new major food retail allocations at St Levan Gate, Keyham and Weston Mill Sports Pitches (PLY58). The reasons for this are outlined in the response to 7.5.i.a. below.

7.1 (ii) Is Policy PLY4 (Devonport Naval Base and Dockyard's strategic role) clear about the area it covers? In relation to where MoD land is surplus to requirements, is it reasonable for priority to be given to seeking uses 'which help deliver the plan's economic growth objectives....' or does the evidence justify a more flexible approach by referring to the plan's growth objectives overall rather than just economic objectives?

We have no comment on whether priority should be given to the different objectives. However, it is the view of the Co-op that the evidence does not justify major additional food retail development in Devonport. We note that the Devonport and Waterfront areas are identified as exceptions at Appendix C of the Retail Study as not being within a 10-minute drive of a major or discount food store. We would

contend that Devonport is in fact well served by either major or discount supermarkets as shown on Map 1 of Appendix C. This shows that there is no deficiency of food retail provision in the Devonport area.

7.3 The Derriford and Northern Corridor Growth Area (Policies PLY38-PLY41 and PLY43-PLY47)

7.3 (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):*

- a. *Is the type and amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?*

The Co-op's concerns with regard to these policies is the general lack of evidence demonstrating that there is a need for major food retail provision within Derriford in the short-medium term.

In the first instance, it is important to note that Policy SPT5 acknowledges that there is no objectively assessed quantitative need for any type of retail floorspace until after 2026. Furthermore, in respect of food retail specifically, it is not until the mid-2030s that any notable surplus expenditure exists.

With regard to Derriford (and other proposed allocations), we do not find that the 2017 Retail Study provides 'compelling' evidence of an immediate (i.e. short-medium term) quantitative or qualitative need for the following reasons:

- The deficiency in the existing provision of major/discount supermarkets is certainly not pronounced enough to justify major food retail provision in the short-medium term at Derriford before the late 2020s/early 2030s (either qualitatively or quantitatively);
- The existing residential area of Derriford is not locationally deprived of access to smaller or large retail provision;
- Conclusions around the accessibility of smaller and large food retail options in Derriford are vague in relation to the scale of the deficiency and as a result, the identified need is not compelling;
- There are other potential options to providing small scale convenience provision which could be considered (such as extensions to existing stores) to meet any alleged short-term need;

- Furthermore, choice and competition across Plymouth is acknowledged as being strong and there is no urgent need to plan for new food retail provision (as indicated by paragraph 3.17 of the 2017 Retail Study);
- The retail study does not provide any examples of stores ‘over-trading’;
- The quality of existing provision is acknowledged as being good throughout the district although there is a clear desire for improvements to existing stores in Estover and the City Centre respectively. However, this does not provide compelling justification for additional food retail provision in Derriford (or anywhere else in the district) in the short-medium term.

7.3 (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?

The Co-op has no objection in principle to there being new convenience provision within Derriford, but the policy should be adjusted to enable a smaller quantum of provision to be delivered later in the plan period as there is no compelling evidence to provide the level proposed in the short-medium term.

The current policy is too liberal in its ‘in-principle’ acceptance of out-of-centre food retail provision in this location and is not sufficiently able to control the quantum of floorspace which could be provided, despite the evidence base regarding the need for additional convenience floorspace over the plan period.

We support Clause 3 of DEV16, which requires proposals for new retail development of 500sqm (gross) to be subject to an impact assessment as this allows the Council to understand the likely impact of a retail proposal on existing centres which is generally larger than the average size unit in a centre.

7.5 Other areas and sites within the PPA (Policies PLY58-PLY61)

7.5 (i) *Policies PLY58-60 allocate some sites for employment, retail, leisure and other commercial development in south Plymouth, north Plymouth and Plympton and Plymstock to the east (housing site allocation questions are in 6.6 below):*

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?*

As set out in the Co-op's response to 7.3.i.a, the Co-op considers there to be no evidence, quantitatively and qualitatively for the allocation of additional retail floorspace in these locations. In terms of the specific sites, the concerns are as follows:

PLY58/1 [St Levan Gate, Keyham]

- The area already benefits from a good choice of existing retail provision;
- There is no quantitative or qualitative case for the allocation of a foodstore of this scale in this location;
- As a result, the policy, when assessed individually and cumulatively with other retail allocation policies, is unsound and not justified or consistent with national policy;
- The policy should therefore be deleted. Policy DEV16 is adequate to allow retail provision of an appropriate scale to the nearest designated centre to St. Levan Gate to meet any localised need.

PLY58/18 [Weston Mill Sports Pitches and Car Park]

- Again, there is no qualitative case for an allocation of retail provision of this scale in this location;
- It is the Co-op's view that 'enabling' is not a valid NPPF test for the allocation of a site for retail provision;
- The Co-op question whether the impact on the Budeaux District Centre and Victoria Road Local Centre have been fully considered in the plan making process. The Co-op is not aware that the impact of this allocation on the above mentioned District Centres has been assessed, particularly when the

2017 Retail Study confirmed that new allocations for retail provision are necessary.

PLY59/2 [Clifford Road, Southway]

- The policy should be reflective of a recent planning permission for a 1,842 sqm foodstore for a discounter. This planning permission has met the need and therefore the allocation is not justified.