PLYMOUTH
CITY COUNCIL

HOW MUCH SHOPPING FLOORSPACE SHOULD BE PROVIDED AND WHERE?

Plymouth Plan topic paper

Retail Strategy

How much shopping floorspace should be provided and where?

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What is this topic paper about?

How much shopping floorspace should be provided and where should it go?

This topic paper has been published as part of Plymouth Plan Connections. It is one of a series of topic papers that are being published to provide information and to support the Council's ongoing discussions with local people and organisations about the future of the city.

Plymouth's vision is to become 'one of Europe's finest, most vibrant waterfront cities, where an outstanding quality of life is enjoyed by everyone'. In order to deliver this vision, the city needs to grow in a sustainable way. Retailing has an important part to play in delivering sustainable development by ensuring the right shops, of the right size, are delivered in the right locations.

This topic paper sets out options for changes to the retail strategy for Plymouth, to be delivered as part of the new Plymouth Plan, over the period 2014 to 2031. This paper provides a starting point for discussions by identifying what aspects of the current retail strategy could change and how improvements could be delivered.

What is the existing Strategy?

The current retail strategy for Plymouth is set out in the Core Strategy 2006-2021 and key aspects include:

- Taking a positive approach to retail development in Plymouth which would maximise the benefits of a growing population to encourage new retail developments in the right locations, in support of the vision for the city.
- Promoting a healthy and vibrant City Centre which is essential to Plymouth's economic well-being. A separate topic paper for the future strategy of the City Centre has been prepared.
- Responding to 'gaps' in the distribution of local and district centres across the city by delivering new district and local centres, with the Derriford district centre being part of a wider proposal to create a new heart for the north of Plymouth (Table below).

Policy CS07 - Plymouth Retail Hierarchy	
New District Centres	Derriford Weston Mill
New Local Centres	Devonport Millbay Plymstock Quarry (Morley Park)

- Providing for an important network of local and district shopping centres across the city to support the vision of a city of sustainable linked communities.

What has changed since the Core Strategy was prepared?

Since the preparation of the Core Strategy, there have been a number of changes which need to be considered in evolving the retail strategy for the city:

- There has been a significant change to the UK economy caused by the economic recession. In particular, the retail economy was badly hit by the recession, suffering its worst downturn for over 60 years. However, the economy appears to have turned a corner and is now lifting out of recession and showing solid growth.
- Changes in shopping habits, such as the increasing use of internet shopping, continue to have notable effects on shopping centres. The impact of technological change and innovation, particularly in the area of mobile devices and new forms of retailing based on a blending of physical and internet shopping, is likely to be a key driver of retailing over the next 15 to 20 years.
- There has also been a change in national planning policy, with the publication of the National Planning Policy Framework in 2012[(1)] and the publication of National Planning Practice Guidance in March 2013[(2)]. Key aspects of the NPPF which apply to the retail strategy include:

- A continuation of the centres-first approach which was first set out in PPG6 in 1996. This approach supports the viability and vitality of existing shopping centres by requiring new retail developments to be delivered within existing centres rather than out of town locations
- The sequential approach, which is the policy tool which attempts to deliver the centres first approach. The sequential approach requires that proposals for main town centre uses should be located in town centres first, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.
- The requirement for development proposals for new retail, leisure and office developments with floorspace exceeding 2,500 sq m to be submitted with a Retail Impact Assessment (RIAs) to demonstrate impact. Local Planning Authorities may set lower thresholds if they can be justified through evidence.

This Topic Paper considers these economic, social, environmental and legislative changes alongside the latest retail evidence to determine how the retail strategy for Plymouth can evolve as part of the Plymouth Plan.

1 www.planningguidance.planningportal.gov.uk/
2 http://planningguidance.planningportal.gov.uk/

How much and what type of retail development should we deliver in the future – what does the evidence tell us?

Understanding how much new retail floorspace should be delivered in the city and what kind of shops this should include is a key part of the retail strategy. Evidence which informs the current and future retail strategy for the city, in terms of quantitative need, is briefly summarised below:

Evidence Base
Plymouth Shopping Study by Cushman and Wakefield (2006)[3]
Plymouth District and Local Centres Study by Cushman and Wakefield (2010)
Plymouth Retail and Centres Study by Roger Tym and Partner (2012)[4]
Plymouth City Centre Development Study by GVA (2014)

In 2006, retail consultants, Cushman and Wakefield, concluded that Plymouth had capacity for up to 267,930 sq. m of new retail floorspace up to 2026. However, these figures were dependent upon assumptions about significant population growth being realised and were also based upon assessments of national economic growth which reflected the very high rates of growth achieved throughout the 2000s.

In 2012, the Retail and Centres Study was completed by consultants, Roger Tym and Partners. The 2012 Study was the first assessment of how much new retail floorspace was needed in Plymouth since the onset of the recession, and used information from a point in time when the full implications of the downturn were only just becoming apparent. The findings of the 2012 Study are set out in Table 2 below.

IMAGE: Table 2: Retail floorspace capacity forecasts from the Roger Tym Study 2012

It was immediately clear from the 2012 Study that the need for additional retail floorspace in Plymouth had reduced dramatically, purely as a result of the much lower economic growth forecasts which were based on the impact of the recession, and on the growth of internet shopping. Most dramatically, the need for non food (comparison goods) floorspace had dropped from nearly 268,000 sq m net to at most 114,800 sq m net, more than halving the requirement but still representing a very significant requirement for additional floorspace up to 2031.

The latest assessment of need is set out in the City Centre Development Study by GVA, which was undertaken in 2014. This Study presents revised figures on the capacity forecasts for new retail floorspace, based upon the population growth assumptions contained in the Strategic Housing Market Needs Assessment (2013) and the latest economic growth forecasts

3 www.plymouth.gov.uk/written_report.pdf
4 www.plymouth.gov.uk/homepage/environmentandplanning/planning/planningpolicy/ldf/ldfbackgroundreports/ldfretailstudy2012.htm

which again are based on a full understanding of the impacts of the recession. The GVA analysis indicates that up to 2031, Plymouth has a quantitative need for up to 12,000 sq m net of new food retail floorspace, and 52,600sq m net of new non-food retail floorspace.

In the case of the 2014 GVA study, the amount of floorspace to be delivered in the city has been calculated using two different growth forecasts; and these are population projections and economic forecasting. In relation to the economic forecasting, there are two nationally recognised agencies which provide methods of estimating the scale and pace of economic growth and these are Experian and Pitney Bowes. Experian are considered to be optimistic, whereas Pitney Bowes are considered to be very optimistic. It is considered appropriate for the Plymouth Plan to aim for the optimistic economic growth scenario (Experian) combined with the higher level of population growth as this is consistent with the housing targets as set out in the Housing Topic Paper [insert link].

A further scenario is also introduced in the study which relates to the increase in 'market share' which is the assumption that the amount of money being spent in the city will increase as a result of new developments which are already planned, attracting additional new spending power. Further details on the retail capacity analysis can be found by viewing the GVA Study here: [Insert Link]

Overall, the figures presented by the GVA study represent a reduction in the amount of quantitative need for floorspace to accommodate the growth of retail in Plymouth when compared to previous assessments, and this reduction is driven by the low economic growth which is now being forecast, as compared to pre-recession levels.

The figures set out above represent the quantitative need for additional shopping capacity in Plymouth based on an assessment of additional spending taking place – either as a result of more people living in the city and its catchment or as a result of economic growth. They do not take account of qualitative need, which can exist where new or better quality retail floorspace is needed to respond to deficiencies in the local retail market, such as where:

- a food store is over-trading, i.e. it is being used by more people than it was designed to accommodate;
- there is a gap in provision for food shopping in a part of the city, especially in deprived areas of the city where access to affordable quality food is a key issue.

Another dimension of qualitative need can be where provision of retail development will achieve important regeneration objectives.

Despite the reduction in capacity forecasts set out in the GVA study, the revised figure for new food and non-food retail floorspace still represents significant growth. For example, the revised figures for new food retail floorspace, of up to 12,000 sq m net, would be sufficient to accommodate around three new reasonably-sized supermarkets within the city. The revised figure for new non-food retail floorspace, of up to 52,600 sq m net, equates to around two thirds the size of Drake Circus.

Key Issues to be addressed

There are three key issues to be addressed by the Plymouth Plan.

1. Meeting the need for new retail development, and how this should be distributed across the city. Once the need for additional floorspace is understood, the city's retail strategy must then set out where the floorspace should be provided. Retail development is usually the most valuable form of development – generating higher returns for an investor even than residential development – and food retail tends to generate the highest returns of all. Decisions about where to locate retail development therefore have an added layer of complexity; because of the value of the development, retail uses can underpin expensive regeneration proposals which can deliver much wider social benefits. The challenge for the Plymouth Plan is therefore to find a balance between meeting the needs of retail development and using that development to drive regeneration and deliver wider sustainable linked community aspirations.
2. As highlighted in the existing retail strategy, Plymouth has an established hierarchy of shopping centres; a network of district and local centres, all of which occupy a position in the hierarchy beneath the City Centre. The Core Strategy aims to preserve and enhance the network of district and local centres to support the vision of a city of sustainable linked communities.
   It was identified in the Shopping Centres Supplementary Planning Document (SPD) 2012[5], that some of the local centres within the city no longer provide the full range of facilities expected in a local centre, particularly as some include a very limited number of shops. However, the SPD did identify these small local centres as providing important and desirable services for their immediate neighbourhood. Similarly, there are a number of small retail facilities located throughout the city which do not form part of a designated local or district centre, but which potentially play an important role in supporting sustainable linked communities. Taking these issues into consideration, the Plymouth Plan will therefore give consideration to revising the hierarchy of district and local centres and there are a number of options which are presented within this topic paper.

3. Provision is made within the NPPF for local planning authorities to set local thresholds for requiring Retail Impact Assessments (RIAs). RIAs provide an assessment of a proposals impact on existing or planned shopping centres, as well as impact on city centres. The NPPF default threshold requirement for RIAs is for developments of over 2,500 sq m. A locally-defined threshold requirement for RIAs could provide a valuable tool to enable the Council to manage proposals for new retail floorspace more effectively, by ensuring that retail developments are delivered in the right locations, in support of the wider regeneration priorities set out in the Plymouth Plan. A number of options for requiring RIA have been presented later in the topic paper.

5 www.plymouth.gov.uk/homepage/environmentandplanning/planning/planningpolicy/ldf/spds/shoppingcentresspd.htm

So what might the retail strategy for the city look like?

How will we meet our objectively assessed needs for new retail floorspace?

The Core Strategy and Area Action Plans set out key locations across the City for new retail development to take place. The most important of these are:

- The City Centre - the primary location for new non food retail floorspace, and also for an improved food retail offer. The City Centre's importance as a regional destination and the need to find uses to drive the regeneration of key sites such as Colin Campbell Court make this a natural location to continue to maximise retail development.
- Derriford - A new heart for the north of Plymouth at Derriford, anchored by a new district centre. The need for and purpose of this centre is embedded in the Core Strategy Area Vision 9 and its retail policies. A range of evidence base studies have considered alternative sites where the centre could be located, and what the nature of the centre might be. All but one of these alternatives (the Plymouth Airport site) was in Derriford itself. The Draft Derriford & Seaton Area Action Plan December 2012 set out the Council's specific aspirations for the development. However, the AAP was found unsound and although it has not been withdrawn by the Council to enable it to be a background document for the Plymouth Plan, it carries only limited weight. Nonetheless, the benefits of locating the centre within Derriford itself were acknowledged by the Planning Inspector and it will be a key task of the Plymouth Plan to identify the preferred location for the centre.
- Weston Mill - A new district centre in the west of Plymouth, where there is currently a lack of foodstore provision leading to trips for food shopping across the breadth of the city, and a lack of access to food shopping facilities in the west of the city. The Core Strategy identified Weston Mill as the area where this new foodstore could be located, but there is an opportunity through the Plymouth Plan to consider whether there are other locations which could provide the new district centre for the west of Plymouth.
- Other locations such as Millbay and Sutton Harbour where retail development can assist wider regeneration aims are set out in AAPs
- Marsh Mills retail parks, including Marsh Mills Retail Park, Coypool Retail Park and Errill Retail Park – This area has a concentration of out of town retail warehouses. Although the Core Strategy requires that further retail development here must meet all the policy tests, there is also an allowance that if this is achieved retail development may also help to create better places and linked communities at Marsh Mills.
- Laira Embankment - Core Strategy Policy CS07 refers to Laira Embankment area to deliver a new retail destination of appropriate scale, quality and accessibility which delivers improvements to this city gateway location. The proposal refers to a site known as the Western National site where a permission exists for retail warehouses. The site, however, has been affected by the Eastern Gateway Transport Scheme, which has seen the construction of a new road across the site. The proposal was also linked to the redevelopment of Friary Mill Retail Park which given recent investment seems to be unlikely. It may be, therefore, that this proposal should be dropped from the Plymouth Plan.

One of the key questions for the Plymouth Plan is whether these locations remain the appropriate ones as part of the over-arching retail strategy for the city. A number of alternative options for the distribution of retail floorspace have been set out below, followed by an indication of what is likely to be the preferred option for the Plymouth Plan.

Options for the distribution of new retail floorspace	Comments
Option 1: No framework - Let the market determine where new floorspace is delivered.	This option would not allow the Council to maximise the benefits that retail development could bring in helping to deliver the wider regeneration priorities for the city. A free market approach to delivering retail floorspace could also see new retail developments in the wrong locations which could be to the detriment of existing centres, particularly the City Centre. This approach would also be contrary to the sequential approach set out in NPPF.
Option 2: Deliver all new retail floorspace in the City Centre.	This option would mean that the Council would not be able to respond to the identified gaps in retail provision across the city i.e. Derriford and in the west of Plymouth. Furthermore, the City Centre will not in all cases be the right location for certain types and formats of retail. Having such a restrictive approach to new retail developments could be a barrier to investment and would have a negative impact on the existing and planned shopping centres across the city.
Option 3: Retain and evolve the broad spatial distribution and prioritisation as set out in the Core Strategy.	This option would respond to the existing and previous evidence base documents and would recognise the City Centre as being the primary retailing destination for the city and sub-region. It would also allow for new retail to be delivered in response to the gaps in provision identified such as at Derriford and in the west of the city, while also maximising the benefits of retail development to deliver the wider regeneration priorities for the city.

Question 1

Do you agree that these are the main alternative options for the distribution of retail floorspace?

Are any alternatives missing?

On the basis of the Council's retail evidence base and its wider spatial planning and regeneration objectives, Option 3 is likely to be favoured. It is anticipated that the Plymouth Plan should continue to prioritise the City Centre, allowing for the fact that the shape of the centre is likely to and indeed needs to change over the plan-period. This matter is considered more fully in the City Centre topic paper, but the Council believes that a strong and vibrant City Centre is crucial to the achievement of its overall growth vision for Plymouth.

Furthermore, the Core Strategy objectives for Derriford remain as valid today as they did in 2007. The north of Plymouth still lacks a heart; Derriford is the natural heart for the north of Plymouth and its most accessible location in terms of public transport provision. Derriford already hosts many complementary commercial, health and educational uses and has the assets to make a district centre work. A district centre would also help resolve the area's current lack of identity; a new centre in this location would be a catalyst for the wider transformation of the area, including major new residential and commercial development, especially given that Derriford is the second node of Plymouth's bi-nodal economy as set out in its Local Economic Strategy; and there remains a spatial gap in food shopping which a development at Derriford would fill.

In relation to Weston Mill, this may well remain a good location for a new district centre, but the lack of delivery since the Core Strategy was adopted is a concern. Other sites could equally meet the gap in spatial provision in this more deprived area of Plymouth and may need to be considered to secure a deliverable scheme. This will be a matter for the Plymouth Plan Part 2 site allocations work that will conclude during 2015.

Millbay and The Barbican are both waterfront locations with a key role to play in the visitor economy, as well as supporting a local residential community and regeneration objectives. These locations could be expected to support some retail which fits their particular context.

It is anticipated that out of centre proposals for comparisons goods will need to be very strictly limited to bulky-goods shopping to ensure that the key retail investment priority of the City Centre is protected.

Question 2

Do you agree that the Plymouth Plan should continue to promote the locations identified above for retail development or is there an alternative distribution?

Question 3

What is your view on what the Council's approach to out of centre sites, such as the Marsh Mills retail parks and the Eastern Gateway site should be?

Changes to the retail hierarchy

Below the City Centre a network of district and local centres will provide for the more local shopping needs of neighbourhoods across the city. An important issue for the Plymouth Plan to address is whether to amend the retail hierarchy in response to evidence such as that included in the Cushman and Wakefield District and Local Centres Study 2010. This study found that some local centres within the city no longer provide the full range of facilities expected in a local centre (as highlighted in the previous national policy, PPS4), particularly as some include a very limited number of shops. The study felt that these centres could be part of a new local designation of 'neighbourhood centres'. Development management policies would be most protective of the retailing function of District Centres, less so in Local Centres (particularly outside of the defined frontages), and most flexible in Neighbourhood Centres (which may not define frontages but only centre boundaries). A range of options in relation to the retail hierarchy are identified below. As proposals for new retail developments are encouraged first and foremost within existing and planned shopping centres, as part of the centres first policy, the Council will need to go through a process of determining whether those shopping centres identified in the current retail hierarchy are appropriately designated.

Options for amendments to the retail hierarchy	Comments
Option 1 - No change – Retain the hierarchy of shopping centres as currently set out in the Core Strategy.	This approach would not take account of the issues identified through previous evidence documents in terms of the number of shopping centres which are not meeting their designated role for a number of reasons. It has also been identified that there are some smaller areas of retail throughout the city which have not been recognised in the retail hierarchy. Therefore, it is likely that the Plymouth Plan will need to update the retail hierarchy.
Option 2 – Create a new level of shopping centre designation to deal with those smaller centres which are not really local centres.	The Cushman and Wakefield District and Local Centres Study 2010 recognised that there were 26 local centres which could realistically be classed as 'Neighbourhood Centres' (Table 3). Including a new local designation of 'neighbourhood centre' would mean that those smaller centres would still be afforded a level of protection against their loss. These facilities, whilst small, provide important local facilities for their neighbourhood, helping to meet the shopping needs at a very local level, therefore contributing towards the overall sustainability of neighbourhoods.
Option 3 – De-designate those local centres which provide a very limited number of shops	There is a concern that if the smaller centres are recognised in the retail hierarchy, either as local centres or a 'neighbourhood centre' designation, they could attract new retail developments of a much larger scale which would otherwise be better located in the other larger district and

Options for amendments to the retail hierarchy	Comments
	local centres. It is for this reason that the retail study prepared by Roger Tym and Partners in 2012 recommended that future strategic plans should only include the hierarchy from City Centre to local centre, in addition to distinguishing their role within the hierarchy and identifying the areas for change.
Option 3a: De-designate the smaller local centres but recognise their importance as 'neighbourhood centres' playing an important part in the provision of services to communities	This is essentially a variation of Option 3. The centres would still cease to be recognised as part of the retail hierarchy. In terms of retail policy such an approach recognises that these very small centres are not focused around an important retail role. This option, however, recognises that the centres have importance in their neighbourhoods as a focus of community activity, and in some cases contain other non retail, community uses. In order to recognise this role, the Plymouth Plan could create a new designation of neighbourhood centre, recognising the function of these centres an dtheir importance to local communities, yet avoiding the potential pitfalls of having a retail designation as set out in Option 3 above.

Question 4

Do you agree that these are the main alternatives in relation to the retail hierarchy?

Are any alternatives missing?

It is likely that the option 3a would be the preferred approach for changes to the retail hierarchy, as it would recognise the importance of smaller local centres while ensuring that new, larger scale retail developments are delivered in appropriate locations. The following table provides an indication as to which local centres could be designated as neighbourhood centres due to their small size and/or function.

City Centre		
Plymouth		
Major District Centre		
Derriford (new)		
District Centres		
Mutley Plain	Roborough	Plymstock Ridgeway
Transit Way	Estover	**Weston Mill (new)**
St Budeaux	Plympton Broadway	
Local Centres		
Albert Road	Embankment Road	Station Road (Devonport)
Barbican	Ernesettle	Stoke Village
Beaumont Road	Higher Compton	Underwood
Chaddlewood	Hyde Park	Victoria Road
Colebrook	Marlborough Street	West Park
Coypool	Peverell Corner	Whitleigh Green
Crownhill	Peverell park Road	Wolseley Road
Cumberland Street	Plymouth Road	**Devonport (new)**
Ebrington Street	Salisbury Road	**Millbay (new)**
Elburton	Southway	**Plymstock Quarry (new)**
Neighbourhood Centres		
Clittaford Road	Hender's Corner	Oreston
Congreve Gardens	Honicknowle	Pennycomequick
Dale Road	Hooe	Segrave Road
Delamere Road	Keyham	Stone Barton
Efford	King Street	Tamerton Foliot
Eggbuckland	Leigham	Union Street
George Street	Lipson Vale	Upland Drive
Glenholt	Milehouse	West Hoe
Ham Green	North Prospect	

Table 3: Suggested amendments to the retail hierarchy

Question 5

Do you agree that the approach of including ‘neighbourhood centres’ as a local designation is the right way to deal with the smaller local centres which exist?

Question 6

Have we identified the right shopping centres to become neighbourhood centres in Table 3 or are there others?

Thresholds for Retail Impact Assessments (RIAs)

RIAs provide an assessment of a proposals impact on existing or planned shopping centres, as well as impact on city centres. The NPPF default threshold requirement for RIAs is for developments of over 2,500 sq m. A locally-defined threshold requirement for RIAs could provide a valuable tool to enable the Council to manage proposals for new retail floorspace more effectively.

The Plymouth Retail and Centres Study prepared by Roger Tym and Partners in 2012 highlighted that Plymouth has a lower than average percentage of convenience floorspace and a low average unit size within the City Centre. The study suggested that the cumulative impact of this, along with a number of retail planning applications being submitted in recent years points towards the necessity for a lower threshold than the 2,500 sqm (gross). It was therefore recommended that a local threshold should be set at 500sq m to ensure that all retail development planning applications are assessed according to a full range of impact tests to determine impact on existing centres, and in particular the City Centre.

Options for RIA threshold	Comments
Option 1 – No change (Use the default threshold contained within the NPPF)	The NPPF threshold I sset at a size which would only permit the Council to test the retail impact of very large propsals. 2,500 sq m represents a retail scheme comparable to a medium sized supermarket, whereas it is quite possible for smaller proposals to have a significant adverse impact on existing centres. In addition given the reduced retail capacity in Plymouth, it is important to ensure that the Council can consider carefully where that capacity is located, to ensure it fulfils the aims of the retail strategy and the City Centre strategy.
Option 2 – Define a local threshold which is lower than the NPPF default (E.g. retail developments over 500 sq m must submit RIA)	A lower threshold would allow the Council to retain the control over the location of new retail development, taking account of impact on centres and the delivery of its retail strategy.

It is likely that Option 2, to set a lower local threshold for Retail Impact Assessments, will be the preferred approach. Given that the quantitative need assessments prepared by GVA have revealed a requirement for a reduced amount of retail floorspace in the city, compared to previous assessments, the Council will need to have greater control over out of centre retail proposals so that retail developments can be used to drive the sustainable community and regeneration objectives for the city.

Question 7

Do you agree that these are the main alternatives in relation to the thresholds for retail impact assessments?

Are any alternatives missing?

What happens next?

Any comments received on this topic paper will be considered in the preparation of the Plymouth Plan. You can make comments at www.plymouth.gov.uk/PlymouthPlan or by email plymouthplan@plymouth.gov.uk. Alternatively, please post your comments to:

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The closing date for consultation responses is 25 October 2014.

List of key Plymouth Plan evidence base documents.

- Plymouth City Centre Development Study by GVA (2014)
- Derriford and Seaton AAP Final Inspectors Report, August 2013
- Inspector's Preliminary Main Concerns issued for fact check - 25 April 2013
- Derriford and Seaton AAP Inspector's Preliminary Concerns 4 May 2013
- Derriford and Seaton Area Action Plan, Submitted, December 2012
- Derriford and Seaton Area Action Plan Delivery Framework, Plymouth City Council, December 2012
- Sustainability Appraisal to the Derriford and Seaton Area Action Plan - Submission Version, December 2012
- Plymouth Retail and Centres Study by Roger Tym and Partner (2012)
- Derriford and Seaton Area Action Plan Report on proposed new district shopping centre, Cushman and Wakefield, January 2011
- Plymouth District and Local Centres Study by Cushman and Wakefield (2010)
- Derriford Development Framework Evidence Report, LDA Design, February 2009
- Derriford and Seaton Proposed New District Shopping Centre, Cushman and Wakefield, 2009
- Plymouth Shopping Study by Cushman and Wakefield (2006)

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