

# Breckland Local Plan Examination

## **Matter 11:**

## **Town Centre and Retail Strategy (Policy EC 05)**

### **Breckland District Council Hearing Statement**

March 2018



Issues

**11.1: Is the retail and town centre hierarchy identified in Policy EC 05 justified?**

1. The hierarchy of centres set in Policy EC 05 is justified by evidence and is recommended in both the original Breckland Retail and Town Centre Study (2010) (LP/ER/4) and the Breckland Retail Study Update (2014) (LP/ER/2). The original study (LP/ER/4) considered the role of all 5 town centres in Breckland against the wider retail offer beyond the district. The hierarchy was informed by an analysis of quantitative and qualitative data and based on consideration of the shopping hierarchy and commercial property indicators<sup>1</sup>.
2. The 2014 Retail Study Update (LP/ER/2) provided a more up to date overview of the retail offer using the Venuescore UK Shopping Index which ranks centres according to provision of multiple retailers and anchor store draw, as well as an assessment of the existing convenience and comparison retail offer for each town<sup>2</sup>. This continued to highlight that Dereham and Thetford contain the main concentration of comparison floorspace in the district, and these towns ranked higher in the UK shopping index thereby demonstrating they provide a more comprehensive retail offer than the other towns in Breckland. Swaffham, Watton and Attleborough support the two main centres by providing shops and services to meet the day to day needs of their towns and rural hinterland (more of a convenience offer). These three towns generally sit at the same level within the hierarchy and are similar in terms of:
  - range, scale and nature of retail and service facilities;
  - extent of rural catchment area and proportional retention of retail expenditure.
3. Proposed growth in Attleborough was factored into the assessment of the hierarchy, but this in itself does not present a justification for altering the hierarchy. Even with the proposed housebuilding the population of Attleborough will still be lower than Dereham and Thetford, and Policy GEN 04 seeks to limit new retail development for the Attleborough SUE to serve local need by setting floorspace restrictions.
4. In summary, evidence in the Breckland Retail and Town Centre Study (2010) (LP/ER/4) and the Breckland Retail Study Update (2014) (LP/ER/2) supports the retail and town centre hierarchy set out in Policy EC 05. The strategy

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<sup>1</sup> Breckland Retail and Town Centre Study (2010) (LP/ER/4) Section 4 - The Shopping Hierarchy page 19-21

<sup>2</sup> Breckland Retail and Town Centre Study Update (2014) (LP/ER/2) Section 2 – The Hierarchy of Centres, pages 2-5

recommendations for the hierarchy of centres to be maintained, concluding that the approach to the hierarchy of centres in the Local Plan remained appropriate and should be carried forward<sup>3</sup>.

**11.2: Are the floorspace requirements set out in Policy EC 05 justified and founded upon robust and up-to-date evidence?**

5. Retail floorspace requirements set in Policy EC 05 have been informed by robust evidence which has been updated as the Local Plan has developed to Submission stage.
6. The Issues and Options consultation document (LP/S/6) set draft net floorspace requirements based on the recommendations set out in the Breckland Retail and Town Centre Study<sup>4</sup> (2010) (LP/ER/4). The Study provided an in depth consideration of retail and commercial leisure trends, planning policy context, the shopping hierarchy (within Breckland and the surrounding area) and used household surveys to provide detailed qualitative and quantitative data about shopping patterns. There was an acknowledgement at Regulation 18 Issues and Options stage (LP/S/6) that new planning commitments (planning permission for retail schemes in the main towns), new population forecasts, expenditure growth figures and changing retail spending patterns would alter projections as the Local Plan developed until submission stage.
7. The second update was undertaken in 2014 to inform the Preferred Directions consultation document (LP/S/8). The Breckland Retail and Town Centre Study Update (2014) (LP/ER/2) reviewed changes in national planning policy following the introduction of the National Planning Policy Framework (NPPF) and amendments to permitted development rights. The update also refreshed the evidence base taking it up to the period 2036 (as opposed to 2026 previously) through provision of a new household survey, expenditure forecasts and floorspace projections. The floorspace requirements set in Policy PD 07 of the Preferred Directions consultation document

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<sup>3</sup> Breckland Retail and Town Centre Study Update (2014) (LP/ER/2) Strategy Recommendations Hierarchy of Centres - Paragraph 7.16-7.20, page 54 – 55

<sup>4</sup> Breckland Retail and Town Centre Study (2010) Conclusions and Recommendations, section 15 pages 89-95, Nathaniel Lichfield and Partners (LP/ER/4)

(LP/S/8) was based on the conclusions and recommendations set out in the Breckland Retail and Town Centre Study Update<sup>5</sup> (2014) (LP/ER/2).

8. The retail evidence was partially reviewed in the form of the Breckland Retail and Town Centre Study 2017 Addendum (LP/ER/3) which provides an up to date assessment of retail need which informed the Breckland Local Plan Pre-Submission Publication (LP/S/1). The Addendum re-assessed the quantitative scope for new retail and food and beverage floorspace based on the latest population and expenditure projections. The retail floorspace requirements set in the final proposed policy EC 05 Town Centre and Retail Strategy are based on the conclusions set in the Addendum<sup>6</sup>
9. Following the Pre-Submission consultation and submission of the Local Plan, two errors have been identified in the Breckland Retail and Town Centre Study Addendum (2017) (LP/ER/3) relating to an omission of data relating to the completion of a supermarket in Dereham in October 2016 and due to a lapsed permission for a supermarket in Thetford in December 2016 which was incorrectly counted as a retail commitment. The Breckland Retail and Town Centre Study Addendum (2017) (LP/ER/3) has been subject to revision by Lichfield consultants in respect of errors identified in the pre-submission public consultation on the Local Plan. The revised document has been admitted to the Examination Library under reference LP/ER/3A.
10. In the corrected Addendum LP/ER/3A, the recommended convenience and comparison retail floorspace requirement for Thetford set in tables 6.1 and 6.2, page 8, has increased due to the lapsed permission for the Thetford Enterprise Park supermarket and petrol station/kiosk (lapsed 22nd Dec 16)<sup>7</sup>. As this planning permission cannot be counted as part of the committed retail provision this has resulted in an increase to the retail need for Thetford. The convenience requirement has increased from 1,231 sq m gross to 2,938 sq m gross and the comparison requirement has increased from 4,892 sq m gross to 6,344 sq m gross for Thetford. This converts to a net calculation of 2,057 net sq m convenience requirement and

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<sup>5</sup> Breckland Retail and Town Centre Study Update (2014) Conclusions and Recommendations, section 7, pages 51-61, Nathaniel Lichfield and Partners (LP/ER/2)

<sup>6</sup> Breckland Retail and Town Centre Study Addendum (2017) Conclusions, section 6 pages 8-9, Lichfields (LP/ER/3)

<sup>7</sup> Identified in the representation by Stapleford Group Thetford Ltd. 1131249 to the Pre Submission consultation.

4759 comparison requirement. (see response to question 11.4 for explanation of the conversion)

11. In the corrected Addendum LP/ER/3A, table 6.1 page 8, the convenience floorspace requirement for Dereham has been reduced to reflect the completion of the Aldi supermarket in October 2016 which has resulted in a reduction of need for additional convenience retail space in the town. However, there is still a need for new convenience retail space. The projected convenience floorspace requirement in Dereham has reduced from 2,786 sq m gross to 1,208 sq m gross. This converts to a net calculation of 862 net sq m convenience requirement (see response to question 11.4 for explanation of the conversion).
  
12. Whilst this results in a change to the evidence it does not have substantial implications for the policy direction in the Local Plan, as there is still a need for new convenience floorspace in Dereham in the plan period and there is still a requirement for convenience and comparison retail floorspace in Thetford. However, the Council recommends that the Inspector considers the following proposed modifications to the retail policy in the plan (EC 05) to reflect the revised figures set out in Breckland Retail and Town Centre Study Addendum LP/ER/3A. The proposed modification is set out in the table overleaf:

**Policy EC 05 Town Centre and Retail Strategy**

Policies in the Local Plan will seek to support and enhance the vitality of the District's hierarchy of centres and seek to direct floorspace requirements in line with the breakdown in the 2017 retail study projections over the plan period

Town	Hierarchy	Convenience Requirement (net sq m)	Comparison Requirement (net sq m)	Food and beverage (gross sq m)
Thetford	Key Centre	<del>862</del> <u>2057</u>	<del>3669</del> <u>4758</u>	925
Dereham	Main centre	<del>4950</del> <u>862</u>	5220	849
Attleborough	Medium town centre	1025	1242	820
Swaffham	Medium town centre	0	804	220
Watton	Medium town centre	491	1172	181

**11.3: Is the approach of Policy EC 05 in terms of delivering the identified floorspace requirements justified?**

13. In its recommendations, the Breckland Retail and Town Centre Study Update (2014) (LP/ER/2) states that emerging Local Plan policies should continue to seek to maintain and enhance the vitality and viability of the five main town centres in Breckland, in the context of competing higher order centres surrounding Breckland including King's Lynn, Norwich, Bury St. Edmunds and Cambridge, which restrict the growth potential of Breckland's market towns. Assessment of floorspace requirements (the most recent update within the Breckland Retail and Town Centre Study 2017 Addendum, LP/ER/3) sets a relatively limited requirement for each town, some of which could come forward through the reuse of vacant units or through redevelopment opportunities within the town centres.

14. In line with the NPPF, the Council has considered site allocations to accommodate retail uses in the town centre. Sites submitted for consideration for retail uses were assessed in the Sustainability Appraisal accompanying the Preferred Directions consultation document<sup>8</sup>. Of the four sites submitted for consideration as a retail site, none were considered to be suitable for allocation for retail uses, however two sites were subsequently assessed and allocated for employment uses. The original Breckland Retail and Town Centre Study (2010) (LP/ER/4) assessed a number of potential development sites<sup>9</sup> but these sites were not submitted by landowners or occupiers for consideration through the Local Plan process, are all in use for commercial, retail or car parking and are therefore currently not available for development (excluding land which forms part of saved policy D6).
15. In order to support the town centres and deliver new retail development, the policy seeks to encourage applications for retail uses to come forward by making it clear to potential applicants what type of retail development is required for each town over the plan period based on robust evidence of retail need. The Authorities Monitoring Report enables the retail floor space requirements to be monitored over time in line with commitments and completions, thereby providing an update on retail need over the plan period.
16. The identification of defined town centre areas in Policy EC 05 provides certainty of the area in which retail development will be encouraged and provides flexibility over which sites could come forward within the town centre boundaries. This approach is preferable to the reasonable alternative, which would consist of allocating sites identified in the 2010 Retail Study that are not known to be suitable, available or deliverable for a relatively small level of retail floorspace in each town. This could undermine new opportunities coming forward to meet the retail need which are likely to be driven through current developing projects such as the Councils Market Town Initiative. This initiative, approved by Breckland District Council in July 2017 commits the Council to a budget of £230,000 to be spent on projects which will strengthen the economic, social and cultural standing of Breckland's five market towns and includes proposals to bring vacant shop units back into use and to regenerate underutilised or dilapidated areas within the town centres. In tandem with these proposals, Norfolk County Council have undertaken a series of workshops in late 2017, early 2018 for

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<sup>8</sup> Part 2 Sustainability Appraisal December 2015 Employment and Retail, section 30, pages 132-151 (LP/S/11)

<sup>9</sup> Breckland Retail and Town Centre Study (2010) Development Sites, Appendix 6, Nathaniel Lichfield and Partners (LP/ER/4)

towns across Norfolk including Breckland's Market Towns focusing on providing an assessment of transport improvements which would help improve accessibility in the town centres. Proposed Policy EC 05 provides flexibility to support new initiatives aimed at improving Breckland's town centres.

**11.4: Why do the additional convenience and comparison floorspace figures set out in Policy EC 05 not match those identified in the Breckland Retail and Town Centre Study (2017) at Tables 6.1 and 6.2?**

17. The convenience and comparison floorspace requirements in Policy EC 05 are directly based on the Breckland Retail and Town Centre Study Addendum (2017) (LP/ER/3). These figures are presented in the study as a sq. m gross figure but have been converted to a net sq m requirement in the Local Plan.

**11.5: Are the impact assessment thresholds set out in Policy EC 05 justified?**

18. The NPPF advocates the use of locally set floorspace thresholds to trigger impact assessments for retail, leisure and office development proposals, where the proposal is located outside town centres and could have an impact on town centre vitality and viability. The impact assessment threshold set in Policy EC 05 is supported by the evidence set in the Breckland Retail and Town Centre Study (2014)<sup>10</sup>. This states that the NPPF standard threshold of 2,500 sq. m gross is inappropriate as a blanket threshold within all towns in Breckland, as this scale of development would represent a significant proportion of the overall retail projections in the district. Development smaller than 2,500 sq. m gross could have a significant adverse impact on the smaller town centres. A reduced threshold of 500 sq. m is recommended in the study to apply to Swaffham, Watton and Attleborough and villages reflecting floorspace projections. The study justifies a larger threshold of 1,000 sq. m for Thetford and Dereham as the floorspace projections are generally higher and the centres are larger, capable of absorbing more trade diversion and impact.

**11.6: What is the status of Policy D6 Dereham Retail Allocation - Georges Road/ Nunn's Way to Cowper Road of the adopted Site Specific Policies and Proposals Development Plan Document? Does this need to be referred to in the Plan for it to be effective?**

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<sup>10</sup> Breckland Retail and Town Centre Study (2014) Impact Tests section 7.35 – 7.43 pages 57-58, Nathaniel Lichfield and Partners



19. Policy D6 comprises a proposed retail site for Dereham at Georges Road/Nunn's Way which was originally allocated in the Site Specific Policies and Proposals Development Plan Document, 2012 (LP/D/2). Site D6 provides an estimated 4,900m<sup>2</sup> (net) comparison goods floor space and 1,800m<sup>2</sup> net floor space which alongside reuse of vacant shops would meet the identified retail need for Dereham. It is proposed that Policy D6 is saved through this Local Plan.
  
20. The Council own a proportion of the site which is currently used as a car park and have undertaken some initial considerations of options for the site and costings. Ultimately, the redevelopment of Cowper Road is a long term project which will involve further consultation with landowners, stakeholders and the public, with the Council as the driving force. It is likely that public funding would be required and that acquisition may need to take place over time with existing tenants in place. Retaining site D6 shows the Councils commitment to regenerating the site and will help to justify bids for funding to help with initial costs of site assembly.
  
21. The Pre-submission publication contains a list of saved policies in Appendix 4. The saved policy D6 should feature in the final list of saved policies for clarity of its status. The Council recommends that the Inspector considers a proposed modification to the list of saved policies in Appendix 4 of the Breckland Local Plan to include saved policy D6, which will then be subject to consultation.