

**LDP EXAMINATION: BASINGSTOKE & DEANE
DISTRICT COUNCIL**



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**WRITTEN HEARING STATEMENT ON
ISSUE 7: EMPLOYMENT, TOWN CENTRE, RETAIL
DEVELOPMENT & RURAL ECONOMY**

On behalf of Festival Place Unit Trust

25 September 2015

This Written Hearing Statement has been prepared by Nathaniel Lichfield and Partners (NLP), on behalf of Festival Place Unit Trust (FPUT), to respond to the Inspector's Issue 7 (employment, town centre and retail development) Questions 13.4, 14.1, 14.2, 14.3 and 14.4, further to our representations to the emerging Local Plan (dated 4 October 2013 and 13 June 2014) on the:

- Local Plan Vision and Objections
- Policy EP2 – Employment Land and Premises
- Policy EP3 – Town, District and Local Centres
- Policy SS8 – Basing View
- Policy SS9 – Basingstoke Leisure Park
- Town Centre Policies Maps

Context

The Local Plan acknowledges the regional shopping centre role of Basingstoke Town Centre (1.26) and, amongst other things, seeks to *“strengthen Basingstoke Town Centre’s role as a destination of choice, for residents, workers and those living outside the borough for retail, culture and leisure”* (Objective D).

The Local Plan (3.8) states that Basingstoke Town Centre should continue to be the main focus for retail development and a key location for leisure and entertainment uses. The Infrastructure Delivery Plan (2014) (5.11) recognises that *“Basingstoke will continue to face competition from other centres such as Southampton, Winchester and Reading”*. The competition from these and other centres within or influencing Basingstoke’s catchment area must not be underestimated, as there is considerable retail, cultural and leisure development in the pipeline.

The responses below, to the Inspector's Issue 7 Questions, seek to ensure the strengthening of Basingstoke Town Centre, the largest and principal centre and 'hub' for the borough (LP 3.8 & 7.20-21), and in particular Festival Place, the principal retail and leisure attraction within the centre.

Q 13.4 - Basing View Regeneration: Does policy SS8 strike the right balance between focus and flexibility?

No. The policy is too flexible and could be interpreted as unjustifiably permissive.

The current wording of the supporting text (4.71) to Policy SS8 states that the majority of the Basing View site (excluding the Gresely Road Triangle) will be considered as an edge of centre location for all town centre uses other than retail. This approach conflicts with the sequential assessment approach of Policy EP3, as well as the NPPF (24) and PPG, and provides ambiguity over the type of uses envisaged and encouraged at Basing View.

Part of the problem in SS8 lies in the need for greater clarity in the LP spatial strategy. This (at 3.8) rightly promotes Basingstoke town centre to continue to be the main focus for new retail

development. However, it should also promote the town centre as the main focus for leisure and entertainment uses – indeed, all town centre uses – rather than merely a “key location” for such uses.

In order to be consistent with national and local sequential policies, the spatial strategy and Policy SS8 in particular should seek to ensure that all main town centre uses (particularly retail and leisure) are first directed to Basingstoke town centre and, if any proposal satisfies the EP3 sequential test, it must then satisfy the EP3 impact test. Accordingly, SS8 should encourage uses which are complementary and do not dilute the offer provided in Basingstoke town centre and Festival Place in particular.

Thus, to provide the appropriate (less) flexibility at Basing View, in order to be consistent with the ‘town centre first’ policy in the NPPF and LP EP3, we suggest that the supporting text (4.71) is amended as follows:

“A small part of the western end of Basing View will be considered as ‘edge of centre’ for retail uses as it falls within 300m of the Primary Shopping Area. Part of the Basing View site is within the Basingstoke Town Centre boundary where town centre uses, other than retail, will be permitted. The remainder of the Basing View site (excluding the Gresley Road Triangle) will be considered as a an edge accessible preferred out of centre location for main town centre uses, if there are no sequentially preferable sites available other than retail, in light of the aspirations to regenerate the site in its entirety to deliver a sustainable business location. Such uses must complement rather than detract from the offer in Basingstoke town centre.”

Q14.1 - In policy EP3, should the Plan make provision for a specific quantum or range of retail floorspace in Basingstoke town centre which is justified and deliverable within the plan period?

Yes and no. Making explicit provision for a specific quantum or retail floorspace is not necessary within the Policy, given the ability to meet the (more) limited need through the reuse of vacant units within the town centre and future development potential facilitated by the proposed expansion of the town centre boundary. However, specific policy encouragement should be given to the food and beverage and leisure sectors, as the town centre lacks the range, quality and diversity in these sectors.

The Basingstoke & Deane Retail Capacity Refresh 2015 (RCR) identifies significantly lower retail capacity than the 2012 Retail Study Update (3.18). Borough-wide convenience retail capacity is now predicted to emerge by 2027 and comparison capacity by 2022, owing largely to the impact of new development and planned commitments (particularly at Basing View). Beyond 2022, the RCR forecasts convenience retail floorspace capacity of 2,727sq.m net and 21,365sq.m net comparison retail floorspace in 2029 (4.6-4.7), the latter figure being after 2,989sq.m allowance for reoccupation of prime vacant retail floorspace. Furthermore, the RCR (appropriately) caveats that capacity forecasts beyond five years should be *treated with caution* (3.23).

The RCR (2.57-2.58) identifies that the proportion of vacant units in Basingstoke (12.7%) is slightly higher than the average for town centres in the UK (11.5%) and that the majority of vacancies within the town centre are concentrated at Festival Place Shopping Centre, particularly along Queen Anne’s Walk and Kensington House.

We therefore consider that, in relation to quantum, the approach set out in the Local Plan satisfactorily responds to the requirements of the NPPF (23) and PPG (ID 2b-003) to ensure that the town centre can accommodate the scale or retail development needed by 2029, through a combination of reoccupation or redevelopment of vacancies and the planned expansion of the town centre. The Plan should nonetheless update the retail capacity findings in para 7.22, to incorporate the latest evidence (i.e. RCR findings).

Local Plan Policy EP3 should though explicitly encourage an appropriate range of retail and other main town centre uses (particularly food and beverage and leisure) within the expanded Basingstoke town centre, as this is the area in which Basingstoke is relatively weak. Festival Place, in particular, has a low representation of food and beverage operators compared to other shopping centres and a healthy demand for new provision. Such increased diversity of offer would assist the town centre to better address current trends on shopping and leisure behaviour and thus better compete with other (expanding) town centres and out-of-centre developments.

To satisfy the need and demand for increased range in the 'F&B' and leisure offer, it is therefore fundamental that Policy EP3 provides a flexible approach to accommodating future retail (Use Classes A1 – A5) and leisure uses (Use Class D2) within Basingstoke town centre. Flexibility is also necessary to ensure that the town centre can respond to market demand and other rapid changes in the retail sector over the Plan period (consistent with NPPF 14).

FPUT suggests that Policy EP3 is re-worded as follows:

“Proposals for shops (A1 Use Class) are encouraged within the defined Primary and Secondary Shopping Frontages. Other retail uses (Use Classes A2-A5) and leisure uses (Use Class D2), will be permitted where:

a) Individually or cumulatively they do not undermine the vitality, viability or character of the frontage; and

b) They do not give rise to unacceptable environmental or public safety impacts.

Proposals for the loss of retail uses (A1-A5) to non-retail uses in the defined Primary Shopping Frontage will ~~not be permitted~~. be resisted where they have a significant adverse impact on the vitality, viability or character of the frontage.”

Within the defined Secondary Shopping Frontage, proposals for other town centre uses will be permitted where the above criteria are met and the cultural and historic offer of the Frontage is supported.”

Q14.2 - Is there a need for greater locational and/or qualitative guidance for retail development within or adjacent to town centre or elsewhere?

No, there is sufficient locational guidance for retail development within EP3 and its explanatory text and the changes to the Basingstoke town centre boundary on the LP Proposals Map. There is also no need for greater qualitative guidance beyond making EP3 more permissible for A2-A5 and D2 uses within Basingstoke town centre, save for clarifying that a 'town centres first' approach does apply - See our responses to Questions 13.4, 14.1 and 14.4.

Policy EP3 provides the town centre first policy to ensure that retail and leisure development is located in town centres wherever possible in the first instance (Policy EP3). To better guide the appropriate location of retail (and leisure) uses adjacent to the town centre or elsewhere FPUT suggest that Policies SS8 and SS9 are expanded to clarify the requirements for the sequential and impact test (see responses to Questions 13.4 and 14.4).

Q14.3 - Should the Plan provide more detail on the quantum and location (s) of convenience retail provision for the plan period?

No.

See above responses to Questions 14.1 (regarding quantum) and 14.2 (regarding location).

Q14.4 - Basingstoke Leisure Park: Does policy SS9 strike the right balance between focus and flexibility?

No. The policy is too flexible and could be interpreted as unjustifiably permissive.

Policy SS9 should seek to ensure that any main town centre uses (particularly retail and leisure) at the Leisure Park are complementary to the town centre and do not detract from, or dilute, the offer provided at Festival Place or within the wider town centre.

The current wording of draft Policy SS9 does not acknowledge the Leisure Park's out of centre location or requirements for the sequential and impact tests to be applied. This is inconsistent with the NPPF (24) and conflicts with LP Policy EP3.

To be consistent, and provide (more) appropriate flexibility at the Leisure Park, we suggest Policy SS9 is amended as follows:

“New and improved leisure facilities will be permitted at Basingstoke Leisure Park where there is (a) no significant adverse impact on existing town or district centres within Basingstoke and (b) no sequentially preferable locations within existing town or district centres within Basingstoke that could accommodate the proposed development.”