



CHRISTCHURCH AND EAST DORSET CORE STRATEGY EXAMINATION

August 2013

On behalf of Sainsbury's Supermarkets Ltd.

Matter 9 – Town and Retail Issues.

28/08/13

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1. Our client, Sainsbury's Supermarkets Ltd., has an interest in the proposed mixed use urban extension at North Christchurch (Policy CN1) and wishes to ensure that the planning policy framework securing the delivery of this extension is sound, positively prepared, justified, effective and consistent with national policy.
2. We wish to address the Inspectors Question no. 1 of Matter 9:

Question 1 – is the town centre hierarchy (KS6) justified with regard to:

- a. Barrack Road – extent of centre and designation***
- b. Roeshot Hill***
- c. Morrisons/ Peacock Way, Verwood***
- d. Land North of Leigh Road, Colehill***
- e. Highcliffe District Centre***

3. Policy CN1 proposes that a new local centre is developed at Roeshot Hill to serve the proposed new urban extension. A new centre in this location would also function to serve existing residents in the area, which are currently not well served by such facilities. Policy KS6, which is referred to by the Councils as the 'Town Centre Hierarchy', fails to support the policy objectives in Policy CN1, as it effectively omits Roeshot Hill from inclusion in the retail hierarchy for the area.
4. The NPPF requires local planning authorities to plan positively for community facilities and services, including local shopping, in order to enhance the sustainability of communities and residential environments (para 70.). Planning policies should seek to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. The provision of a new centre at Roeshot Hill, which is identified within a retail ('town centre') hierarchy would be consistent with this guidance.
5. In order to secure the longer term vitality and viability of the new centre at Roeshot Hill, the Councils need to fully consider whether the centre should be included in the retail hierarchy. The NPPF requires local planning authorities to use their evidence base to assess the role and function of town centres and the relationship between them. Good practice guidance "Planning for Town Centres", 2009 provides guidance on the development of retail hierarchies including that there may be scope to plan for new/expanded centres, for example where a major new development is planned and/or there are existing under-served markets. However, the evidence base for the Joint Core Strategy and the responses to previous representations made on this issue (by WYG on behalf



of Sainsbury's Supermarkets Ltd.) do not adequately address this issue or support the Town Centre retail hierarchy set out in Policy KS6. The Councils did not respond to WYG representations (made in June 2012 on the Pre-Submission Core Strategy) requesting that they consider defining Roeshot Hill as a district centre. 'Planning for Town Centres' states that an effective town centre strategy needs to identify policy options including identifying the different centres strengths and weaknesses, opportunities and threats, to identify what scale and form of development is likely to be supportable in different locations, including the scope to expand or create new centres. No such research and analysis appears to have been applied to the case of Roeshot Hill.

6. Given the Councils have identified the need for a new centre at Roeshot Hill and that it is in a sustainable location aimed at serving the new and existing population of the area, it is appropriate, and in accordance with national policy, that the proposed centre should be included in the retail hierarchy for the area and its role and function within that hierarchy properly defined.

7. The NPPF requires that local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes (para.23). It is clear, given the anticipated increase in the local population (as a result of the Roeshot Hill planned urban extension), that there will be a significant increase in demand for shopping provision in the area. Therefore, it is appropriate and necessary to plan for this change. So, in order to positively plan for the future development of a viable centre at Roeshot Hill, the centre needs to be included in the retail hierarchy, and as a district, not a local, centre. The level of *existing* retail floorspace provision at Roeshot Hill (including Sainsbury's as an anchor foodstore), the range of services/facilities proposed for the site and the anticipated increase in demand for shopping provision will clearly result in the new centre operating as a district centre. A district centre can be defined as *'will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non - retail services, such as banks, building societies and restaurants, as well as local facilities such as a library'* ('Planning for Town Centres', 2009). In comparison, a local centre includes *'a range of small shops of a local nature, serving a small catchment'* ('Planning for Town Centres', 2009). Thus, the proposed local centre designation as part of Policy CN1 is inappropriate and inaccurate.

8. The NPPF (para. 70) states that planning policies should guard against the loss of facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. In order to guard against the loss of retail and other facilities at the Roeshot Hill centre, the local planning authority needs to provide a policy framework that will protect the proposed new centre and support the management and sustainable development of that centre over the plan period. In



terms of development management decisions, the centre at Roeshot Hill would currently be defined as an 'out of centre' development and proposals coming forward would be judged accordingly. This could prejudice the delivery of an appropriate level of facilities and services to meet local demands arising from existing and planned new communities. .

9. In conclusion, we remain concerned that the town centre hierarchy in Policy KS6 is not fully justified by the evidence provided to date and fails to support the effective delivery of Policy CN1. As such, we propose that Policy CN1 is amended to identify the new centre at Roeshot Hill as a district centre and that Policy KS6 'Town Centre Hierarchy' is amended to include Roeshot Hill as a district centre.