



Core Strategy Submission

Consultation Response Analysis by Topic

RETAIL



Prepared by Christchurch Borough Council and
East Dorset District Council

May 2013

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1 Introduction

1.1 This Core Strategy Consultation Response Analysis deals with the issue of retail policy, contained in the Vision and Key Strategy Policy KS8. The Analysis also deals with Policy PC4 which deals with shopping in villages and local centres.

1.2 Policies for town centres are contained in a separate Response Analysis.

1.3 This analysis shows the development of Policy KS8 from Pre-Submission to Schedule Of Proposed Changes, including a summary of responses to consultation at both stages, and any changes made to the policy following Pre-Submission consultation.

2 Analysis of Responses

Retail Policy

1 - References to retailing in the Vision.

Pre-Submission

.....Historic towns such as Christchurch and Wimborne will be vibrant centres of commercial and cultural activity, with niche shopping, and varied attractions and facilities for residents and visitors alike. Other key local centres in Ferndown, Verwood, West Moors and Highcliffe will support shops and services for their local communities, with villages and smaller neighbourhood centres providing basic services. New ways of delivering services and facilities in rural areas will be developed.

2.1 Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
12	6	6	28	16	11	13	18	16	14	13	14	21

Table 2.1

2.2 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS902
359277	Mr Jamie Sullivan	Tetlow King	CSPS2655
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1305
359478	Mr Rohan Torkildsen	English Heritage	CSPS2732
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2467
359546	Mrs K. Bradbury	Vale of Allen Parish Council	CSPS391
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1557
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3216
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3217
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2706
510796	Mr Rollo Reid		CSPS2712
523531	Mr Tim Hoskinson	Savills	CSPS2109
524723	Mr John Worth	Wimborne Civic Society	CSPS1890
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	CSPS1909
653603	Mr Malcolm Edmund Parsons		CSPS573
653852	Mrs Susan Newman-Crane		CSPS716
654320	Mrs Meghann Downing	Highways Agency	CSPS747
654456	Mr Elliot Marx		CSPS957
654686	Mrs J E Francis		CSPS773
654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS826

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
654704	Mrs J E John		CSPS1047
655432	Mr Andy Davies		CSPS1017
655526	Mr Paul Morrison		CSPS1029
656228	Mr Adrian Dwyer		CSPS2466
656369	Mr Timothy Peter Cook	John Reid and Sons (Strucsteel) Ltd	CSPS2756
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1466
656567	Mr Michael D Chappell		CSPS2851
656650	Mrs Patricia Fear		CSPS2438
656664	Mr Glen Morrison		CSPS2452

2.3 Summary of Responses

2.4 There were no responses which specifically related to references to retailing in the Vision at Pre-Submission stage.

2.5 Councils' Response - how we have taken into account the consultation responses?

2.6 No changes were proposed to this part of the Core Strategy Vision.

Proposed Changes to the Pre-Submission Core Strategy

...Historic towns such as Christchurch and Wimborne will be vibrant centres of commercial and cultural activity, with niche shopping, and varied attractions and facilities for residents and visitors alike. Other key local centres in Ferndown, Verwood, West Moors and Highcliffe will support shops and services for their local communities, with villages and smaller neighbourhood centres providing basic services. New ways of delivering services and facilities in rural areas will be developed.

2.7 Consultation Response Table

2.8 This section of the Core Strategy Vision did not form part of the Schedule Of Changes consultation as it remained unaltered from Pre-Submission stage. No representations at Schedule of Proposed Changes stage therefore relate to it.

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
0	0	0	0	0	0	0	0	0

Table 2.2

2.9 List of Consultee Reference Numbers

2.10 *Not applicable.*

2.11 Summary of Responses

2.12 No representations received at Proposed Changes consultation related to this section of the Core Strategy Vision.

2.13 Councils' Position

2.14 *This section of the Core Strategy Vision relating to retailing and the role of town centres has attracted little comment during the Pre-Submission consultation and therefore remained unaltered at Schedule Of Proposed Changes stage.*

Retail Policy

2 - Future Retail Provision, Key Strategy Policy KS8

Pre-Submission

Policy KS8

Future Retail Provision

In order for key retail centres in Christchurch and East Dorset to maintain and enhance their vitality and viability, it is important that provision is made for additional retail floorspace to meet the needs of a growing population with associated increasing levels of available retail expenditure. It is also important for our retail centres to maintain their market share of retail expenditure within the South East Dorset sub region and provide the opportunity to increase this market share. In Christchurch there is a projected requirement for in the region of 10,000sqm - 11,000sqm net additional comparison floorspace for the period to 2028 and no requirement for additional convenience floorspace. In East Dorset there is a projected requirement for in the region of 5,000sqm net convenience floorspace and 12,000 - 13,000 net comparison floorspace to 2028. The broad location and level of retail floorspace that could come forward in retail centres across Christchurch and East Dorset contributing towards overall projected requirements is set out below. The Site Specific Allocations Development Plan Document will determine specific sites within the centres where retail development can take place.

Christchurch:

Christchurch Town Centre:

- Comparison Retail Floorspace: 8,000sqm
- Convenience Floorspace: No additional requirement to 2028

Highcliffe Centre:

- Comparison Floorspace: 800sqm
- Convenience Floorspace: No additional requirement to 2028

East Dorset:

Ferndown

- Comparison Floorspace: 5,200 sqm
- Convenience Floorspace: 3,600 sqm

Verwood

- Comparison Floorspace: 1,150 sqm

- Convenience Floorspace: 700 sqm

West Moors

- Comparison Floorspace: 550 sqm
- Convenience Floorspace: 110 sqm

Wimborne Minster:

- Comparison Floorspace: 6,650 sqm

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
4	0	1	9	1	3	6	2	1	3	3	2	2

Table 2.3

2.15 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2120
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2474
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS1642
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS2007
490823	Mr Ian Jones	Ferndown Town Council	CSPS2975

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
503395	Mr Ian Davis		CSPS2319
512459	Mrs Sandra Davis		CSPS2359
523627	David Lowin	WYG Planning & Design	CSPS1580
649505	Miss Dawn Leader		CSPS299
654310	Mr Bryan Taylor	Savills Commercial Ltd	CSPS663
656498	Mr Matthew Morris	GVA Planning Development	CSPS2906
664634	Mr C Benham	Turley Associates	CSPS3833

2.16 Summary of Responses

2.17 The comments from key stakeholders and the general public in respect of this policy have been grouped together as follows:

2.18 *General Comments*

- Sixpenny Handley with Pentridge Parish Council - The fact that it is limited to urban provision should be stated - Future Urban Retail Provision.

2.19 *Specific Comments relating to Christchurch*

- Savills Commercial on behalf of Saxon Square Management Committee - The Retail Study 2008 is out of date for Christchurch and new evidence is required to reflect a more realistic comparison retail requirement for Christchurch.

- GVA Planning and Development on behalf of The Co-operative - The Co-operative supports (and agrees with) the prediction that no additional convenience goods retail floorspace will be required within Christchurch and Highcliffe up to 2028. The Co-op store lies within Saxon Square and it is noted that this is one of five strategic sites identified as being able to deliver the town centre vision. Whilst not all of these five sites actually lie within the town centre (both Stony Lane sites), it will be important for Policy KS8 to state that these sites should deliver uses/development which is in line with the retail and other land uses proposed by KS8.
- Turley Associates on behalf of Dorset Development Partnership - There is a large amount of convenience expenditure (53%) out-flowing from Christchurch to other areas, particularly Bournemouth. It is therefore considered that a qualitative need exists to provide further convenience goods floorspace in Christchurch town centre in order to provide greater choice and competition and retain a greater amount of the available spend within Christchurch. Consequently, whilst we support the proposal to increase the amount of comparison goods retail floorspace in Christchurch town centre (8,000sq m), Policy KS8 should not preclude further convenience goods floorspace coming forward, particularly where such development could provide other significant benefits to Christchurch, by for example, providing a further anchor to the town centre, drawing further trade into the centre and increasing the potential for linked trips. This view has recently been supported by the Inspector at the Meteor Retail Park appeal (Dec 2011). A centrally located foodstore located at the Magistrate Court's site would provide significant benefits to the town, and draw people to the Bargates area in linked trips.

2.20 Specific Comments relating to East Dorset

- WYG Planning and Design on behalf of Sainsbury's Supermarkets Ltd - We seek clarification on how the convenience and comparison floorspace figures have been identified and why they are significantly lower for some settlements in East Dorset than the retail capacity identified in the Joint Retail Study 2008. It appears the retail capacity figures are inconsistent with capacity figures given elsewhere in the document, including area based policies. It is essential that the retail capacity figures given in the Core Strategy are consistent throughout and it is clear and transparent how they have been derived.
- GVA Planning and Development on behalf of The Co-operative - We consider the additional capacity of 5000sqm convenience retail floorspace identified is overly optimistic for East Dorset, and recommend a more up to date retail capacity assessment is undertaken.
- Ferndown Town Council - the key facts refer to a catchment population of 28,000 but there is a lack of evidence on this point. The Town Council is unable to comment at this time until work has been done and progressed on the Development Plan Document.
- West Parley Parish Council - It is not justified, in that although it establishes a need for 3600 sq meters of retail floor space in Ferndown, it goes on in Policy FWP6, without any further evidence or discussion, to site a 3000 sq. metre store in the separate community and administration of West Parley. The need for the store is not obvious to or supported by West Parley.

- DC Planning on behalf of Wyatt Homes - Policy KS8 could usefully have amendment to add clarity and reflect the Council's approach within FWP6 whereby a convenience foodstore of about 3000sqm is endorsed. KS8 should thus mention West Parley as a place and this quantum of development as need which is to be met in this location. It is unhelpfully silent on the matter.
- This policy establishes a need for 3600sqm or retail space in Ferndown, but the store is to be sited in West Parley. This is not justified.
- Increasing retail floorspace in Verwood town centre will impact on the town's car parks. Verwood's public car parks are not big enough to support any further growth of the centre for daytime use. The strategy should highlight not only floorspace but parking too.

2.21 Councils' Response - how we have taken into account the consultation responses?

2.22 A Retail Study Update (Sept 2012) by NLP has recently been completed and provides an overview of the local retail trends for Christchurch and East Dorset up to 2031. It takes into account recently completed supermarkets, projected population growth and national economic and local trends. The broad floorspace projections have therefore been reviewed in light of this study, and are set out below.

2.23 Policy KS8 sets out the broad distribution for retail floor space in the borough and district over the plan period. Further work will be undertaken through the Site Specific Allocations DPD to determine the detailed allocations for the strategic sites identified in Policy CH1 of the Core Strategy and the distribution of retail floorspace identified in policy KS8.

2.24 Paragraph 4.42

2.25 Change in text to take account of the Retail Study Update (2012) which supersedes projections contained in the 2008 study.

Proposed Changes to the Pre-Submission Core Strategy

Policy KS 8

Future Retail Provision

In order for key retail centres in Christchurch and East Dorset to maintain and enhance their vitality and viability, it is important that provision is made for additional retail floorspace to meet the needs of a growing population with associated increasing levels of available retail expenditure. It is also important for our retail centres to maintain their market share of retail expenditure within the South East Dorset sub region and provide the opportunity to increase this market share. In Christchurch there is a projected requirement for in the region of ~~8,100~~10,000sqm -11,000sqm net additional comparison floorspace for the period to ~~203128~~ and ~~2,300 sqm net~~ no requirement for additional convenience floorspace. In East Dorset there is a projected requirement for in the region of ~~5,200~~5,000sqm net additional comparison convenience floorspace and ~~4,000~~12,000 -13,000 net additional convenience comparison floorspace to ~~203128~~.

Floorspace projections are based on Christchurch and East Dorset councils Retail and Town Centre Uses Study (2012). Future updates tot he retail study during the plan period will inform on-going strategic requirements for retail provision in Christchurch and East Dorset.

The broad location and level of retail floorspace that could come forward in retail centres across Christchurch and East Dorset contributing towards overall projected requirements is set out below. The Site Specific Allocations Development Plan Document will determine specific sites within the centres where retail development can take place.

Christchurch:

Comparison Retail Floorspace: Christchurch town centre will be the main focus for meeting the borough wide projection for comparison floorspace. Highcliffe centre will provide a small scale contribution towards the overall borough wide figure.

Convenience Retail Floorspace: Christchurch town centre will be the focus for meeting the borough wide projection for convenience floorspace.

Further detail on the retail strategy for Christchurch is set out in chapter 5 of the Core Strategy

East Dorset:**Comparison Retail Floorspace:**

Wimborne Minster and Ferndown will be the main focus for comparison retail floorspace provision in the district. Verwood and West Moors will also deliver additional comparison floorspace of a smaller scale to contribute to the overall district projection.

Convenience Retail Floorspace:

Ferndown and West Parley will be the focus for convenience floorspace provision in the district. Corfe Mullen, Verwood, West Moors and Wimborne Minster have potential to deliver smaller scale provision contributing to the overall district figure.

Further detail on the retail strategy for the East Dorset retail centres is set out in chapters 8, 10 and 11.

Christchurch:

Christchurch Town Centre:

- Comparison Retail Floorspace: 8,000sqm
- Convenience Floorspace: No additional requirement to 2028

Highcliffe Centre:

- Comparison Floorspace: 800sqm
- Convenience Floorspace: No additional requirement to 2028

East Dorset:

Ferndown

- Comparison Floorspace: 5,200 sqm
- Convenience Floorspace: 3,600 sqm

Verwood

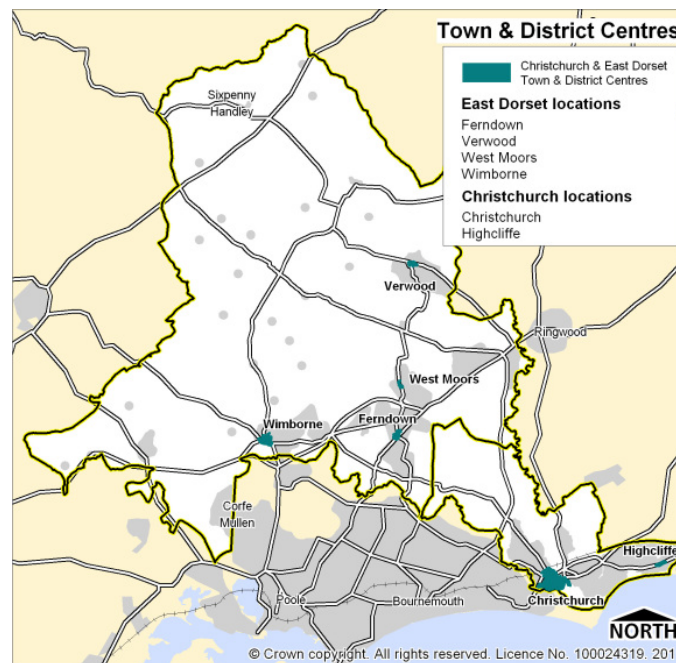
- Comparison Floorspace: 1,150 sqm
- Convenience Floorspace: 700 sqm

West Moors

- Comparison Floorspace: 550 sqm
- Convenience Floorspace: 110 sqm

Wimborne Minster:

- Comparison Floorspace: 6,650 sqm



Map 4.4 Future Retail Provision

Consultation Response

2.26 Consultation Response Table

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
0	0	0	1	1	1	1	0	0

Table 2.4

2.27 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
642224	Mr T Atkinson	Director Christchurch Chamber of Trade & Commerce	PCCS74

2.28 Summary of Responses

2.29 The comments from key stakeholders and the general public in respect of this policy have been grouped together into various themes and are summarised as follows:

2.30 Retail Study Floorspace Projections

2.31 Christchurch Chamber of Trade:

- We do not believe it represents a realistic assessment of either the near or distant future. We are concerned that it has however been used as the basis for updating the Core Strategy without an independent review of its findings and proposals. The figures used have been based on the 'Experian' model which has in recent times not proven to have any great reliability. We do not consider there is any evidence of the need for further retail floor space certainly in the medium term, and as forecasting beyond five years is pure speculation we cannot see the purpose in planning for further growth in the longer term. The report also downplays the importance of the Internet and online shopping. The levels of growth assumed in the report have no basis in fact.

- We disagree with the change to the need for comparison and convenience goods floor space. This new recommendation was based on the 2012 Retail Study Update which has not been given public scrutiny and is not robust. There is no objective justification to plan for additional retail development in and around the town centre. Predictions of future growth have little validity in the current economic situation. The more objective position would be to: Recognise the extent of vacant Retail Property in the town centre Recognise extant permissions for retail development in Wick Lane, Barrack Road, and Somerford.
- We also do not believe that the conditions will encourage the development of the levels of housing necessary to support the assumed increase in population in the Christchurch capture area. On the subject of convenience floor space, the report concludes that there will be a surplus of convenience expenditure in Christchurch of some £19M but neglects that planning permission has already in effect been granted for three new convenience retailers with a capacity of around £45M. We will therefore have a surplus of convenience goods capacity rather than a shortfall and there is therefore no need to plan for further expansion.

2.32 Councils' Position

2.33 The NPPF requires local planning authorities to assess, ***'the needs for land and floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;'***...

2.34 The Core Strategy has been informed by up to date and professionally produced retail studies that have applied nationally established methodology that have used up to date data for establishing projected growth. The Retail Study is based on ONS population projections and takes into account the level of new housing development planned for in the Core Strategy to determine expenditure capacity.

Retail Policy

3 - Shops and Community Facilities in Local Centres and Villages, Policy PC4 (Creating Prosperous Communities)

Pre-Submission

Policy PC4

Shops and community facilities in local centres and villages

In local shopping areas and villages planning applications which propose improvements to the provision of shops which provide for people's day to day needs, leisure uses including public houses and facilities for local communities will be supported in principle.

The loss of existing retail premises, leisure and other local facilities will be resisted unless it is clearly demonstrated there is insufficient demand and it is not feasible and viable to support their continued existence and the loss would not result in a substantial decline in the range and quality of services for local people.

Consultation Response

2.35 Consultation response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
2	0	0	3	2	1	2	1	2	1	2	1	3

Table 2.5

2.36 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID	Number
359284	Miss Lynne Evans	Southern Planning Practice	CSPS2233	Policy PC4
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2497	Policy PC4
524723	Mr John Worth	Wimborne Civic Society	CSPS1956	Policy PC4
654660	Ms Anne Mason	Transition Town Christchurch	CSPS977	Policy PC4
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1495	Policy PC4

2.37 Summary of Response

2.38 The comments from key stakeholders and the general public in respect of this policy have been grouped together into various themes and are as follows:

2.39 General Comments

- Southern Planning Practice on behalf of Hall and Woodhouse - This seems to address similar issues set out under Policy LN6. Is there a need for both policies? There are much more onerous requirements relating to the potential loss of community facilities under PC4 in comparison with Policy LN6.
- DAPTC - Resisting the closure of a non profitable rural retail premises is not going to make it profitable. A policy is required that provides support for that community.
- Transition Town Christchurch - Support - this is essential to prevent isolation of satellite communities which is otherwise likely to occur as Peak Oil and rising fuel prices make transport increasingly unaffordable.
- Wimborne Civic Society - Shopping/tourism is a vital aspect of life in our area. We wholeheartedly support this policy.
- Sixpenny Handley with Pentridge Parish Council - Resisting the closure of a non profitable rural retail premises is not going to make it profitable. A policy is required that provides support for that community and encourages business investment.

2.40 Coverage of Policy

- Southern Planning Practice on behalf of Hall and Woodhouse - Objection to the policy requirement to demonstrate that the loss would not result in substantial decline in the range and quality of services for local people. The principal reason why local facilities and services close is because they are not supported and used by local people and cannot therefore be continued as a viable business. These are almost exclusively private businesses that have no public subsidy or alternative funding mechanisms - as a result if the business folds through lack of support and is therefore no longer viable, there can be no economic or social justification for seeking to keep the facilities. The policy would likely result in the premises being left

vacant, boarded up and derelict making no positive contribution to the local economy and community. This would conflict with the core principles set out under the NPPF.

- Southern Planning Practice on behalf of Hall and Woodhouse - The second part of the policy seeks to resist the loss of such facilities but the tests set are not clear or compliant with national policy. There is no requirement for the word 'clear' in the second line of the second paragraph - this suggests a more onerous test than needing to demonstrate compliance with policy and is unlikely to be the intention of the policy. There needs to be much greater clarity as to what will be required to meet the policy requirements - evidence of marketing the property for a period of time to demonstrate demand and feasibility. Suggest rewording in line with Policy CF in the Purbeck Core Strategy.

2.41 Councils' Response - how we have taken into account the consultation responses?

2.42 The Government has recently recognised the value of local assets such as shops, post offices or community pubs to local communities and has introduced The Community Right to Bid provision as part of the Localism Act 2011. This new right gives voluntary and community organisations and parish councils the opportunity to nominate an asset to be included on a list of 'assets of community value', pausing the sale of successfully listed assets for six months, giving communities the time to prepare a bid and get a business plan together. The Councils suggest that Policy PC4 complements this new national provision in terms of seeking to prevent the loss of community facilities, as well as positively supporting the provision of new ones within the Plan area. This policy applies within the urban areas of the Plan area as well as the rural areas. No change is therefore recommended to this policy.

Proposed Changes to the Pre-Submission Core Strategy

2.43 This policy was not changed following Pre-Submission consultation, and did not therefore form part of the Schedule of Proposed Changes consultation.

Policy PC4

Shops and community facilities in local centres and villages

In local shopping areas and villages planning applications which propose improvements to the provision of shops which provide for people's day to day needs, leisure uses including public houses and facilities for local communities will be supported in principle.

The loss of existing retail premises, leisure and other local facilities will be resisted unless it is clearly demonstrated there is insufficient demand and it is not feasible and viable to support their continued existence and the loss would not result in a substantial decline in the range and quality of services for local people.

2.44 Consultation Response Table

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
0	0	0	0	0	0	0	0	0

Table 2.6

2.45 List of Consultee Reference Numbers

2.46 Not applicable

2.47 Summary of Responses

2.48 Not applicable.

2.49 Councils' Position

2.50 *Policy PC4 attracted limited representations at Pre-Submission stage. No changes to the policy were proposed following Pre-Submission consultation.*