Report to: Strategic Planning Committee

Date of Meeting 7 September 2021

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Town Centres – Strategic Approach

Report summary:

The current local plan contains a number of policies intended to support the appearance and use of town centres, ensuring they are vital and viable. A combination of Covid and increased internet shopping has led to some rapid and significant changes to local Town Centres, in particular a reduction in retail shopping provision. The government have introduced a range of new permitted development rights that give much greater flexibility within town centres and reduce the role for town centre specific local plan polices. Members will need to give consideration as to whether, and how, planning policy might intervene to reduce further losses in the retail sector. Members will also be asked to consider the wider role of town centres and whether more flexibility is required to enable, and perhaps encourage, a wider range of activities, including leisure, housing and community uses where demand for retail units has fallen.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee:

1. **Recommend that the issues raised in this report are used to inform more detailed work to be undertaken on the draft plan.**
2. **Consider each of the elements to town centre policy referred to in paragraph 5.2 of the report and advise which elements they would in principle support.**

Reason for recommendation:

It is important to consider whether it is appropriate to continue to restrict town centre uses to predominantly retail use or whether more flexibility is required to avoid vacant units. It is also necessary to consider the character and extent that any protective/restrictive designations should take.

Officer**:** Claire Rodway, Senior Planning Officer e-mail - crodway@eastdevon.gov.uk, Tel: 01395 517543

Portfolio(s) (check which apply)**:**
☐ Climate Action and Emergencies
☒ Coast, Country and Environment
☐ Council and Corporate Co-ordination
☒ Culture, Tourism, Leisure and Sport
☐ Democracy and Transparency

☐ Economy and Assets
☐ Finance
☒ Strategic Planning
☒ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Medium Impact

Risk: Medium Risk; The approach to protecting town centres is a key consideration in the local plan and they are literally at the heart of our larger sustainable communities. Over the past year our town centres have experienced a significant reduction in trade and high vacancy rates, appropriate Local Plan policies may help to reverse this situation. The Local Plan will also set the context for many planning applications over the lifetime of the plan.

Links to background information National Planning Policy Framework: ,
https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/1010.pdf
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1003618/High_Streets_Strategy_accessible_web.pdf

Link to Council Plan:

Priorities (check which apply)

☒ Outstanding Place and Environment
☒ Outstanding Homes and Communities
☒ Outstanding Economic Growth, Productivity, and Prosperity
☐ Outstanding Council and Council Services

Report in full

1 Introduction

1.1 Town centres are literally at the heart of East Devon communities and are essential to ensuring that resident's everyday needs are met as locally as possible. Town centres have always demonstrated resilience to change, overcoming challenges from increased car ownership, out of town retail parks, the rise of supermarkets and an increase in online banking and access to public services, but they now face unprecedented pressure.

1.2 Retailing has for many years been the core activity in town centres but the pandemic, on top of loss of footfall due to increasing online purchases and slow recovery from the 2008 financial crisis and recession, has led to widespread concern that the future of town centre shops and facilities, and particularly High Streets, is bleak. This report considers the current situation in East Devon and the role that the new Local Plan could take. At the time of writing this report, movement restrictions have very recently been relaxed and it is difficult to predict the impact that Covid will have in the short, medium and long terms. Changes have inevitably occurred but the impact on town centre vitality and viability, and the need for, or type of, intervention which might help with recovery are not yet clear:

Changes to retail behaviour
Lockdowns/non-essential shops closed
Diminished customer experience. Loss of footfall.
High street retail activity collapsing
Virtual High Street
Will shoppers/footfall return?

Changes to working behaviour
Less commuter footfall in TCs
Reduced spend
Reduced demand for personal services
Reduced demand for business support services

Changes to occupancy & property values
Vacant shops/offices
Drag of historic land holdings
Reality check reset?

Changes to social behaviour
Bars/pubs, theatres/cinemas, gyms, nightclubs, restaurants closing in lockdown. Not reopening?
Will outdoor hospitality & indoor measures continue?
Will behaviour towards crowded places change?

2 Current Position

2.1 East Devon has nine towns:

- Axminster;
- Budleigh Salterton;
- Colyton;
- Cranbrook;
- Honiton;
- Ottery St Mary;
- Honiton;
- Seaton; and
- Sidmouth.

2.2 Each of these towns supports a town centre (although at Cranbrook the planned centre is not yet established and so has limited facilities at present. There is currently a Supplementary Planning Document in production for Cranbrook town centre provision and a £40m fund is proposed to fund the improvements.) Colyton is the smallest of the East Devon towns and it has the least facilities of the centres listed. The village of Beer, although a bit smaller than Colyton, actually supports more shops with a number of these most likely to be viable on account of the tourist trade that Beer attracts.

2.3 With the exception of Cranbrook, (and to a lesser degree Colyton and Budleigh Salterton) the town centres of East Devon provide facilities to meet most of the everyday needs of the resident populations of those towns and of surrounding rural hinterlands. A range of shops are found in these centres along with supermarkets and a diverse selection of social and community facilities. Independent shops are comparatively common in East Devon towns. For much larger sized shops and a bigger selection, as well as major recreational and cultural venues and such destinations as major sporting facilities, residents of East Devon would need to leave the District (2019 Avison Young study). If Members aspiration to increase settlement self-containment is to be met then avoidable leakage (where residents go outside the District for goods and services which are also available more locally) must be addressed and reduced, and the role and function of the towns reconsidered.

2.4 The role and function of East Devon's town centres is shifting away from retail uses. The last ten years has seen the decline of traditional shops selling comparison goods as these products can often be bought more conveniently online – bulky white goods, electronics, books and increasingly, fashion and footwear. Nationally town centre footfall has reduced by about 30% in the past 10 years as shoppers increasingly view items in physical shops but purchase through the internet. This can be quick and convenient but it reduces the viability of physical shops and in turn reduces the availability of goods and services to those without the internet, without electronic banking or without the means to access alternative out-of-town shops.

2.5 Whilst East Devon's High Streets are still relatively vibrant (there are fewer vacant units and more independent shops than the national average 10.3 %- (High Streets and Town Centres 2030 report https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/report-summary.html) the traditional anchor town centre uses such as banks, clothing shops and pubs have closed many outlets. Where vacant shops have been taken over, they are often filled by cafes and coffee shops and health and beauty businesses – nail salons, hairdressers, tattoo parlours and barbers – all offering experiences rather than products. Higher numbers of vacant units and new uses with 'blank' frontages or visits by appointment are unattractive to shoppers and reduce the interest and bustle generated by diverse window displays enticing passers-by, although by-appointment businesses can be an excellent way to bring upper floors into use.

2.6 Current policy in the adopted Local Plan aims to ensure that changes of use within the shopping frontages of town centres take place without undermining their retail function. The policy recognises that space in shopping frontages can usefully be taken up by non-retail uses. Such uses can add to the variety, attractiveness and economic activity of the centre, but only so long as they do not concentrate within the primary shopping area so that the retail character of the immediate area is not undermined and does not deter the movement of shoppers in a particular direction within the centre.

2.5 Interestingly, though, as restrictions encouraged people to shop more locally there appears to have been a small but marked increase in demand for high quality, locally produced food. As restrictions have eased there are early signs that this demand is likely to continue, albeit this is only likely to require a modest amount of floorspace in each town. At present this is based on anecdotal evidence but any future retail studies could be asked to quantify this.

2.6 Over the past 18 months there are noticeably more vacant shops in East Devon's town centres. Where vacant shops have been taken over, they are often filled by cafes and coffee shops and health and beauty businesses, a shift towards offering experiences (which cannot be provided online) rather than products. Vacant units and new uses with 'blank' frontages reduce the interest and bustle generated by diverse window displays, although by-appointment businesses can be an excellent way to bring upper floors into use. However, there is the real danger, potentially greatly increased by Covid, that there will be more vacancies in the future and there just will not be the retail or other commercial interests to take over occupancy.

2.7 The current Local Plan contains strategies for each town, including requirements intended to achieve thriving town centres, and policies E9-E15 which protect existing retail uses and main shopping frontages, promote shopping and vitality, resist the loss of shops and services, promote town centre locations for large stores and encourage neighbourhood and village shops and services. There is also a policy promoting the use of upper floors.

2.8 Members will need to consider the role and approach that a new local plan may take for our town centres and the degree to which they wish to intervene. One option is that Members may consider the new Plan should continue to seek to prioritise retail uses, though recognising that recent Government changes to planning rules now provide far more flexibility to change to differing commercial activities and residential use. Alternatively, they may wish to plan to embrace and promote a wide range of commercial and community activities in town centres in line with the Government proposals below. A more radical approach could be to do nothing and let the market decide, although this does risk losing shopping uses (and potentially community/social and recreational uses) in the town centre altogether.

Government Guidance

2.9 The Government position, even pre-Covid, is that 'transformation' is necessary if town centres are to thrive but the type of intervention required to achieve this will vary from place to place. Without intervention there are risks:

- Loss of high streets' retail offer/employment
- Low incentive to invest
- Rundown image & decay
- Empty streets
- Vacuum, fragmentation, hollowing out
- Loss of the heart of places & communities

2.9 In recent years the Government has produced or endorsed a number of proposals for positive transformation. This started with the Portas Review of 2011, which set a vision for the future intended to 'breathe life back into the High Street'. In response to this, in order to enable the High Street to quickly adapt, addressing the problem of vacancy and stagnation, changes to the planning system were introduced in 2015 which allowed for greater flexibility and changes between the use classes as permitted development. This was followed by 'Our Plan for the High Street' as part of the Budget in 2018, which promised Government funding through the 'Future High Streets Fund' in order for High Streets to focus on users 'experience', making them more convenient, acting as a focus for services and engendering a sense of community.

2.10 The government convened an inquiry in May 2018 to investigate the future of the high street called "High Streets and Town Centres in 2030". Although the inquiry acknowledged the challenging retail environment they did not believe that the high street is dead but that there is an urgent need for them to adapt, transform and find a new focus. The inquiry identified 4 systemic issues affecting the high street which can be summarised as follows:

1. Too much retail space – high streets and town centres have become increasingly retail focused with it now being widely considered that most towns have too much retail space to meet current needs.

2. Fragmented ownership – in the past, pension funds and insurance companies owned shopping centres or whole parts of towns, however they have been reducing their holdings such that in smaller and medium towns the majority of shops are owned by individuals and this is seen as a major barrier to a co-ordinated response to change.

3. Retailers high fixed costs: business rates and rents – These are a significant cost on bricks and mortar shops that lead to significant overheads making them uncompetitive on price with internet and out of town retailers who have lower costs.

4. Business taxation: Again these are much higher for high street retailers with a comparison with internet retailers showing that business rates amount to approximately 0.7% of Amazon's UK turnover compared with 2 – 6% for many high street retailers.

2.11 The inquiry went on to look at the future of high streets and town centres and considered the work of the Grimsey Review on the 'Vanishing high street' which considered that "the 21st century town is about an activity-based community gathering place". The inquiry considered that there was a need for high streets and town centres to repurpose themselves and find the right balance between retailing, leisure, health, social care, services and residential. Investment in the arts and culture was considered important and putting town centres at the heart of the community. The inquiry report concludes by saying:

"We are convinced that high streets and town centres will survive, and thrive in 2030 if they adapt, becoming activity-based community gathering places where retail is a smaller part of a wider range of uses and activities. Green space, leisure, arts and culture and health and social care services must combine with housing to create a space that is the "intersection of human life and activity" based primarily on social interactions rather than financial transactions. Individual areas will need to identify the mix that best suits their specific characteristics, local strengths, culture and heritage. Fundamentally, community must be at the heart of all high streets and town centres in 2030."

2.12 The Grimsey Review also includes a section on "What Local Authorities Must Do and When". It discusses the importance of place making and putting great importance on the quality of urban design, public realm and transport connectivity. It then talks about bringing people back into town centres to live and the importance of having flats over shops to increase footfall in town centres. A COVID-19 supplement to the Review has been published which asserts that in order to emerge from this period in better shape we need to see increased power to local communities, dynamic and collaborative leadership, fewer streets and a huge expansion in green spaces and squares that puts sustainability and the environment at the heart of everything and is based in quality of life and experiences.

2.13 In 2019 the High streets and town centres in 2030 (parliament.uk) report helpfully picked up on the findings of the Grimsey Review and set out a vision for town centres which will act as:

- Activity-based community gathering places
- Retail is a smaller part of a wider mix
- Green space, leisure, arts/culture, health & social care services, housing
- Space for social & community interactions

2.14 The Build Back Better High Streets Paper is the Government's most recent strategy, building on the 2019 vision but also considering how high streets and town centres can adapt and thrive after the COVID-19 pandemic. The plan sets out five key priorities to achieve the vision of having "vibrant high streets where communities are at the heart of place-making; where a mix of commercial and residential uses complement each other; and where businesses large and small feel welcome." The plan does not provide any major new policy steer or resources to support high streets.

The five priorities are:

Breathing new life into empty buildings;

- Planning flexibilities around change of use; enabling vacant commercial premises to be demolished and a new development right to convert empty shops, restaurants and offices into homes.
- £150m community ownership fund to enable communities to take over local community assets such as pubs, theatres and post offices.
- Encouraging councils to use Compulsory Purchase Orders for more effective land assembly to facilitate growth.
- Intention to reform legislative framework to ensure local areas have access to delivery vehicles to support growth and regeneration.

Supporting High Street businesses;

- Commitment in principle to make temporary pavement licence measures permanent.
- 12 month extension to temporary permissions for off-sales alcohol
- Legislation to ring-fence debt that has been accrued from March 2020 for tenants who have been impacted by covid-19 business closure
- Working with BIDs to improve stakeholder engagement
- Hospitality-led regeneration hubs, with demonstrators
- Green guide for SME retailers

Improving the public realm;

- Focus on accessible and green infrastructure
- Manual for Streets to be published in 2022
- Government to choose 12 non-London local authorities for intensive investment in mini-Holland cycle schemes
- Local transport authorities being asked to produce Bus Service Improvement Plans by the end of October

Creating safe and clean spaces;

- Litter bin grant scheme
- Increased enforcement on litter, graffiti and gum.
- New delivery model for probation service focussed on visible community pay back.

Celebrating pride in local communities.

- Cultural Investment Fund
- Transforming Places Through Heritage programme
- Office for Place to be established by MHCLG focussed on design quality within the planning system.
- Local celebrations to be led by local authorities to engage communities and local high streets.

2.15 Most of the resources to deliver the 'place' centred actions above will come from existing announcements including Future High Streets Fund, Welcome Back Fund, Community Ownership Fund, Town Deals and the forthcoming Levelling Up Fund and Community Renewal Fund.

2.16 There is a nod to encouraging Local Authorities to use Compulsory Purchase powers for persistently derelict buildings or to progress stalled regeneration schemes. Undertaking physical regeneration and site assembly in town and city centres has frequently been a cost prohibitive issue for many Local Authorities – especially if the final uses of any regeneration have lower end use classes and land values than the previous retail use.

2.17 New permitted development rights have already been put in place to support town centres with the introduction of the new Class E use class which now allows changes of use between a wide range of town centre uses without the need for planning permission. Class E includes the following uses:

- Shops
- Professional and financial services
- Cafes and restaurants
- Offices
- Research and development
- Light industry
- Non-residential institutions such as clinics, day care centres etc.
- Assembly and leisure uses such as gyms

2.18 Buildings within Class E can also be changed to dwelling houses up to a floor area limit of 1500sqm and subject to various limitations, conditions and a prior approval process. There are also now in place permitted development rights that allow the upward extension of commercial and mixed use buildings by up to 2 storeys to provide flats subject to various restrictions and a prior approval process.

2.19 These new permitted development rights now significantly limit the control that a Local Planning Authority has over developments that affect town centres. We therefore need to understand what actions we can take to support our town centres and high streets within the current planning system and that starts with a better understanding of the issues at a local level.

Evidence

2.20 At present up-to-date East Devon specific evidence is lacking although some work is in progress.

- Avison Young undertook a two part retail assessment for the (then proposed) Greater Exeter Strategic Plan which was published in 2019. Much of this is still very relevant but the pandemic has impacted upon some retailers and the current 'health' of the towns will have changed.
- One Public Estate has funded Thriving Town Studies for Axminster and Exmouth
- The Future of Towns Study, commissioned by Heart of the South West LEP, has been commissioned but not yet published.
- High Street footfall data & business surveys commissioned by EDDC
- Postponement of the Our Towns Study (Dec 2020)
- No date yet for study resumption

- As economic turbulence subsides & reliable baseline demand, footfall & projection data can be developed, aim is: TC assessment is part of evidence base to inform new Local Plan policy.
- Our Towns Study will be in 2021/22 Service Plan as an aspiration

2.21 Ideally, a comprehensive analysis of East Devon towns would be undertaken to inform the new Local Plan. This could:

- Provide up to date retail/commercial use demand data
- Take account of government policy changes
- Be informed by HoSW & One Public Estate studies, footfall & business surveys
- Provide fresh re-examination & approach to explore TC redevelopment/regeneration
- Identify investment/funding opportunities, planning policy options, site improvements, feasible projects.
- Enable seizing opportunities from centrally funded initiatives aimed at reinvigorating High Street/ TCs

2.22 The introduction of so many permitted development rights that address issues we would usually seek to control through policy mean it is likely that any local plan policies will need to take a lighter touch approach to town centre issues. For example primary retail frontages that previously sought to retain a retail core at the heart of our town centres will now be redundant as permitted development rights allow a much broader range of uses without the need for planning permission. There may still be a need for spatial designations centred around where "Class E" uses take place. There will still be a significant role for policies that protect town centres from out of town retail and other uses that undermine their role. It is also considered that policies that seek to encourage certain uses that support the role of town centres may also be important to include in the plan. Local Plan policies will need to be justified. This table sets out the evidence that is likely to be required:

<table>
<tr><td colspan="3">Town Centre Hierarchy- This will be established through the Roles and Functions of Settlements Study. It is currently proposed that settlements will fall into the following categories
Tier One – Principal Centre: Exmouth
Tier Two – Main Centre: Honiton, Sidmouth, Axminster, Seaton, Ottery St Mary, Cranbrook
Tier Three – Local Centre: Budleigh Salterton, Colyton, Broadclyst, Lympstone, Woodbury</td></tr>
<tr><td>a) The extent of Town Centres and the role they fulfil

Evidence about the current role and function of each Town Centre should include:
Retail & commercial leisure trends
Market research – shopping patterns
Retail market share</td><td>b) Spatial designations

Evidence should include:
Assessing the future role of Primary Shopping Area's and whether they become "Class E zones" and if so how</td><td>c) Use of Sequential & Impact tests

Application of NPPF sequential test -are proposals town centre, edge of centre or out of centre?
For retail use, edge of centre</td></tr>
</table>

Leakage of expenditure out of district to other centres Qualitative Town Centre health check Quantitative & qualitative retail needs assessment (convenience/comparison) Commercial leisure needs assessment	should they be drawn. Impact of increasing flexibility towards mix of uses Evidence on the need for other uses e.g. housing; & evidence to support site allocations & opportunity zones	relates to PSA boundary For other main town centre uses it relates to Town Centre boundary. So evidence needed to justify identification of PSA & Town Centre boundaries for sequential test purposes. Local plan is an opportunity to establish a local impact threshold to manage retail development outside of defined centres (NPPF#89). Needs evidence on: Scale of proposals relative to Town Centre Existing Town Centre viability/Vitality Cumulative effects of developments Are the Town Centres vulnerable Likely effects on any Town Centre strategy Impact on planned investment Assess whether a blanket or tiered threshold is appropriate to assess edge of centre/out of

		centre retail proposals

2.20 As this is an ongoing, fluid, situation, and will be informed by pieces of work which are currently outstanding, it is not considered an ideal time to commission a piece of analysis. In the immediate term, it is proposed that Officers will undertake desk based research to establish as much of the evidence required as possible. Members can use this information to consider their policy options in the new plan, for example to determine the extent of the town centres, any areas to be primarily retail uses and whether land should be allocated for specific uses.

3 Feedback from the Issues and Options consultation

3.1 The Issues and Options consultation is the most recent evidence that we have. With regard to the town centre questions, most respondents favoured mixed commercial uses in town centres, with over half of respondents supporting leisure or community uses and very little opposition to these. Dominant retail use (as has traditionally been promoted by policy) received around 30% support and a similar level of opposition. In the written comments the use of upper floors for services, community activities and housing was strongly supported and a range of measures suggested to encourage this. A significant proportion of respondents (around 20%) were opposed to change of use to housing, although this also received considerable (quantified) support. In the written comments most concern related to the permanent loss of retail units to housing and the consequent impact on the retail function of the town centres. Edge-of-centre and first floor residential use received considerable support. The need for town centres to be vibrant social spaces was expressed by many respondents. A range of activities, areas to sit and increased community, health and service uses were seen as a major draw.

3.2 Individual comments included:

- The objective should be to build self-sustaining communities for a diverse range of people/retaining community cohesion and high footfall
- Service industries and cafes should be encouraged to improve vitality. If these can be established above shops that would double the footfall
- A strong focus on heritage, culture and the arts to make each town centre special
- Plan for social spaces (café's, gardens, stalls, pop-up shops) to encourage use of outside areas. Encourage street markets, music, food events to create vitality
- Uses at first floor and above should be strongly encouraged- Gyms and leisure uses, housing and community use
- Housing should not dominate but should be integrated to maintain a mix of uses and reduce vehicle movements/Allow housing on the edge of centres but retain centre for shopping/services. Only allow housing where adequate facilities (including parking and outside space) can be provided for the residents.
- A split of opinion between it being better to have housing than empty shops and concern that, once a shop is changed to housing, it is permanently lost.
- Retail uses should be promoted in town centres and footfall is still encouraged despite online shopping. This could include town centre showrooms with goods available to see/try on before collection/delivery from warehouses, speciality retailers and goods collection points e.g. for those who aren't at home to collect packages.
- Greater pedestrianisation (day-time car free streets) and more convenient public transport
- Cheaper business rates, car parking and affordable space for community groups and arts

- Promote shared community use- for sports/gyms but also education/culture/spiritual uses
- Potential for seaside towns to be redeveloped, prioritise removing existing eyesores and establish a coherent character for new development
- Rural settlements should not lose existing retail and community facilities.
- Need to accept that private cars are inevitable in rural areas
- Policy should be flexible so that it can quickly respond to changing circumstances

3.3 In addition respondents were invited to comment on additional town centre policy objectives. Three additional areas were suggested where policies may be appropriate, including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement, and respondents were encouraged to add their own views. Two thirds of respondents agreed with the suggested policy areas but additional comments included:

- Different responses are needed for each town centre. These should be produced in consultation with the local community and neighbourhood plans.
- Out of town retailing should be resisted and, where it is allowed, should have similar conditions to town centres e.g. parking charges and be accessible to pedestrians and cyclists
- Make centres pedestrian and public transport friendly. Make car parking cheap or free.
- Offer a town wide online presence so small retailers can offer goods online and share costs.
- Need to promote local foods and goods, encourage farm shops but not as competition to the High Street shops (or there could be a co-op shop for local farmers to sell through).
- Redevelop out of town shopping areas as housing (especially sheltered housing)
- Accept out of town retailing and improve access to it and the shopper experience.
- Encourage linked trips to town centres.
- Make town centres social spaces and focus on the shopper experience

4 Relationship to Neighbourhood Plans

4.1 Neighbourhood Plans contain limited policies relating to town centres. Only the towns of Budleigh Salterton, Exmouth, Sidmouth and Ottery St Mary (written jointly with West Hill) have 'made' Plans, although Colyton's Plan is at an advanced stage. Generally the Plans are keen to retain a variety of shops and services, meeting resident's everyday needs, and wish to resist the loss of existing shops to other uses. Concern has regularly been expressed that shops are being/may be lost to housing through permitted development.

4.2 Local communities will be consulted on any policy proposals and, if a masterplan is proposed for any of the towns, community involvement will be intrinsic to its success.

5 Policy Options

5.1 The Sustainability Appraisal process is intended to ensure that, through plan-making, social, environmental and economic considerations are taken into account in a systematic manner. This means that a range of reasonable policy options will be assessed or 'tested' to ensure that the approach taken in the new Local Plan is appropriate and that the reasons for discounting reasonable alternatives are justified and explained.

5.2 At this stage in the process it is not appropriate to recommend a particular policy approach to town centres, however changes to permitted development rights have significantly reduced the extent of control that we can exert through the local plan on town centre issues. In light of this there are considered to be 3 broad elements that could be included within the town centre policies. Members are asked to consider these different approaches and give their thoughts on which they would like to see included in a draft plan:

- Town Centre First Element– These are policies that define town centres in the district and then seek to ensure that they are the focus for town centre uses by seeking to impose restrictive policies on these uses in locations that are outside of town centres. Such an approach would require a sequential test to be complied with where such uses are to be permitted outside of a town centre to ensure that it has first been demonstrated that such uses cannot be accommodated within or closer to the town centre. An impact assessment would also be required where they are to be located outside of the town centre to demonstrate that they would not significantly undermine the vitality and viability of the town centre. This is an approach adopted in the current local plan and remains part of government policy. An initial assessment of policy options would suggest that this approach should be included in a new Local Plan as a minimum. Would Members agree?

- Active Frontages Element – This approach would involve including policies in the plan that seek to retain a core area at the heart of each town centre where policies seek to retain active frontages such as shops, cafes and restaurants etc. that attract footfall and ensure that they are vibrant spaces. These are currently termed “primary retail frontages” in the current local plan, however given the move away from retail led town centres and the introduction of the new Class E use class it is likely that these would need to be more focused around an area where none Class E uses would be restricted to some extent. This would be to ensure levels of activity are maintained particularly at ground floor level and seek to ensure that uses such as bars, pubs, takeaways and hotels that are outside of Class E and generate limited day time activity are limited in number and remain focused on the periphery of the town centres. An alternative approach would be to say that such uses represent a significant investment in a town centre and should be welcomed even in the core of the town and perhaps the night time activity that such uses generate is just as important as the day time activity and footfall generated by shops.
- Promote and Encourage Element – This approach would potentially add an additional layer of policy that would include policies that seek to encourage particular uses and activities that would help to improve the vitality and viability of our town centres. The future of town centres is seen to be to have more events, pop up shops and spaces, more leisure uses and experiences that bring people into town centres and keep them coming back by providing new and different experiences each time. Many of these may not fall within the control of the planning authority but Members may still see merit in having policies that seek to encourage the delivery of such uses and activities. It may in reality be more for an economic development strategy to promote and deliver these activities given that many such activities will be permitted development in planning terms.

More evidence gathering is needed to inform future policy choices but Members views on the above approaches would help to guide officer thinking at this stage and understand the evidence requirements.

6 Conclusion

6.1 Town Centres will continue to be essential for local communities but it is likely that their function will evolve from one of primarily meeting retail needs to fulfilling social and leisure requirements as well. Evidence supports continuing strong protection of retail space (albeit that this might be in a contracted area) but additional evidence is required to give an up to date picture of the health of the town centres.

Financial implications:

There are no specific financial implications which require comment at this stage.

Legal implications:

There are no legal comments other than as set out in the report