

GRAVIS
PLANNING

BELFAST | DUBLIN

Our Ref: C04046

20 December 2018

Development Plan Team,
Planning Department,
Strule House,
16 High Street,
Omagh,
BT78 1BQ.

Re: Response to Local Development Plan 2030 – Draft Plan Strategy.

We act on behalf of CCP IV Omagh S.A.R.L who are the owners of the Showgrounds Retail Park in Omagh. We wish to make the following submission in response to a number of proposed policies in the above Draft Plan Strategy document, the second stage in Fermanagh and Omagh District Council's Local Development Plan process.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

Consistency Tests

- C1 Did the council take account of the Regional Development Strategy?*
- C2 Did the council take account of its Community Plan?*
- C3 Did the council take account of policy and guidance issued by the Department?*
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district ?*

Coherence and Effectiveness Tests

- CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*
- CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*

CE3 There are clear mechanisms for implementation and monitoring; and

CE4 It is reasonably flexible to enable it to deal with changing circumstances.

Showgrounds Retail Park, Omagh

Showgrounds Retail Park is located off Sedan Avenue in the northern end of Omagh Town Centre. It was constructed around 2002 and tenants include Argos, M&S, Peacocks, Next, Tempest, Sports Direct and Poundland. On-site car parking is available and the site is in close proximity to all the major road networks, A5, A32 and A505.

Current Local Development Plan

In the current adopted plan, the Omagh Area Plan 1987 – 2002, (the “OAP”) the retail park is within the Limit of Development for Omagh Town and Omagh Town Centre (Fig. 1 below).

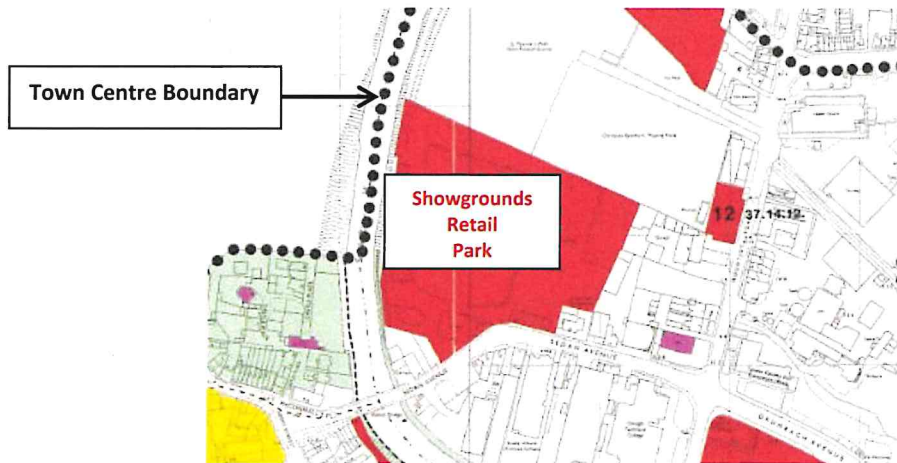


Fig. 1 – Excerpt from OAP 1987 – 2002 (annotation added)

The site is identified as an Opportunity Site in the OAP and has since been developed as Showgrounds Retail Park.

Proposed Draft Plan Strategy

In terms of retailing, the proposed Draft Plan Strategy regarding the Local Development Plan 2030 (DPS) provides sections on Context, Justification and Strategy along with a number of draft policies. It acknowledges that both the RDS and the SPPS recognise the important role and the promotion of established town centres as the first location of retailing (4.27) and that Omagh and Enniskillen provide the largest retail offer in the Council area (4.28). The DPS also advises that the Town Centre Health Checks for Omagh and Enniskillen suggest a need to manage and closely monitor the provision of retail within these town centres to ensure their future attractiveness, viability and vitality (4.30). The DPS also states that the principal focus for retail growth shall be within Omagh and Enniskillen town centres (4.31).

We wish to state that we support the proposal to continue to retain Showgrounds Retail Park within the town centre boundary for Omagh.

Proposed Primary Retail Core Boundary in the DPS

The current OAP does not define a retail core on a map but refers to “...a relatively compact retail core with its main shopping frontage along High Street, Market Street, John Street, Bridge Street and Georges Street.” The OAP goes on to state “However, the retail sector in recent years has continued to expand, to the east into the Campsie area, and also to the south into previously neglected backlands in Scarffe’s Entry, Foundry lane, Prospect Court and the Royal Arms Mews. Further backland expansion into Old Market Place and into more peripheral streets such as Sedan Avenue and Kelvin Road has also taken place.” (para. 37.2).

The Draft Plan Strategy proposes a Primary Retail Core shown in Fig. 2 below.

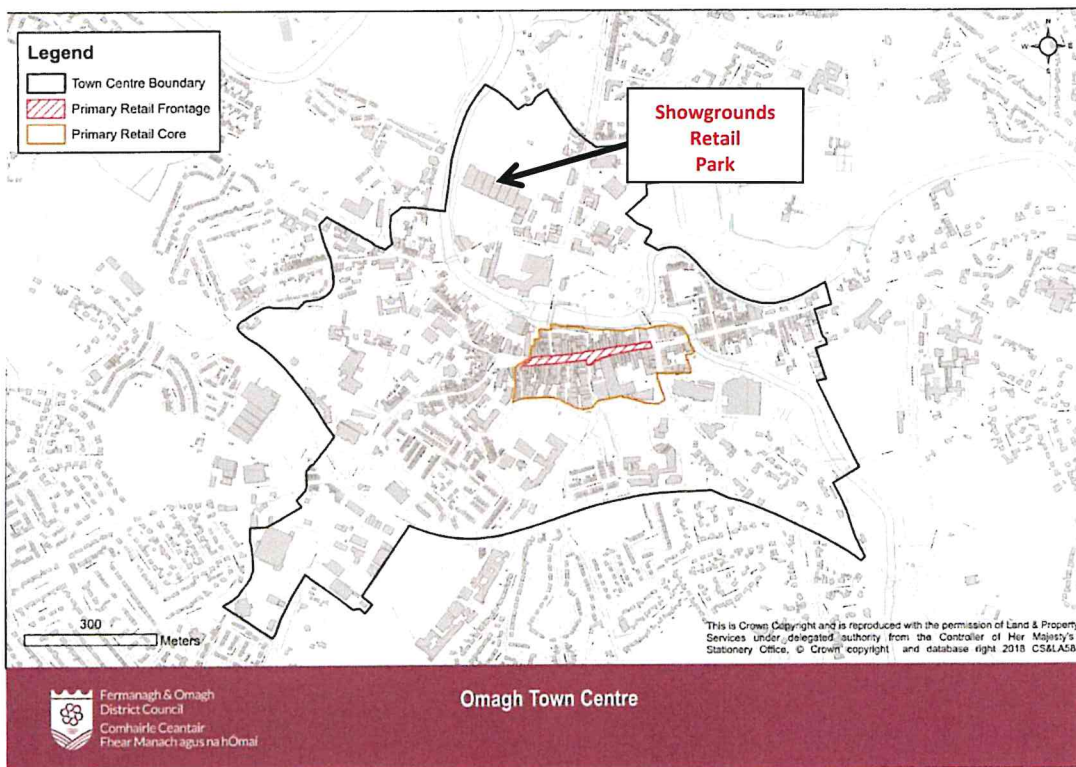


Fig. 2 – Excerpt from DPS (annotation added)

It would appear that the only justification given in the DPS for the proposed Primary Retail Core in Omagh Town Centre is to maintain compact, lively and attractive centres. Showgrounds Retail Park is in close proximity to what is considered to be the existing retail core. According to the OAP, Bridge Street is part of the current retail core which is within walking distance of Showgrounds Retail Park (Fig. 3 below). Showgrounds Retail Park is therefore considered to be closely linked to the current retail core and given the extent and quality of retail provision at the retail park along with the major part it plays in supporting and strengthening the vitality and viability of Omagh Town Centre for many years, it should be included within the Proposed Primary Retail Core.

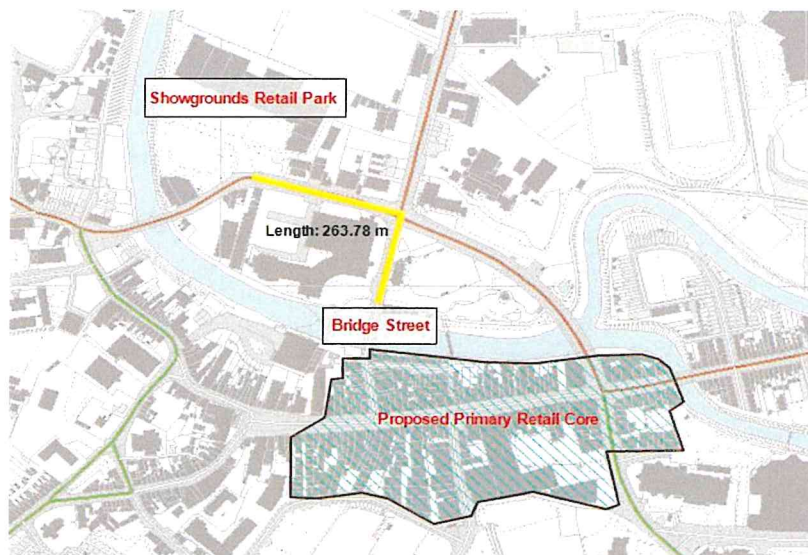


Fig. 3 – Proximity of Showgrounds Retail Park to retail core.

This proposed PRC has now fed into proposed Draft Policy TCR01 – Town Centres which states:

Draft Policy TCR01 – Town Centres

The Council will support proposals for new retail development within the Primary Retail Core (PRC) where defined. For other locations, a sequential approach to site selection will be applied in the following order of preference:

- a) Within the Town Centre Boundary;
- b) Edge of Town Centre Boundary (i.e. adjoining it); and
- c) Out of centre locations (i.e. outside the Town Centre Boundary) where sites are accessible by walking, cycling and public transport.

Proposals for other town centre uses (cultural and community facilities, leisure, entertainment and businesses) shall follow the sequential order (a) to (c).

All applications including extensions¹⁰ for retail development and town centre uses above a threshold of 500m² gross external area which are outside the Primary Retail Core shall be accompanied by:

- a) a full assessment of retail impact as well as need; or
- b) in the case of a Local Town, a full assessment of retail impact in relation to the relevant Main Town centre within its catchment area.

Outside town centres, permission may be granted for a small scale convenience shop¹¹ where it can be demonstrated that:

- it meets a defined local need which cannot be met within an existing centre;
- it will not adversely affect the vitality and viability of existing centres within its catchment; and
- it does not exceed 200m² gross retail floorspace.

As a town centre location, Showgrounds Retail Park has been able to attract major new retailers and trade successfully since planning policy includes a town centres first policy. If the retail park is

excluded from the PRC it would suddenly find itself in a more disadvantaged location than before since new retail development at the retail park would have to demonstrate compliance with the new retail policies if draft Policy TRC 01 is adopted, i.e assessing sites within the Primary Retail Core first and an assessment of retail impact and need.

Soundness

There appears to be no sound planning reason to propose such a small compact Primary Retail Core area and exclude an important retail location which is in close proximity to the proposed core and plays an important role in maintaining the vitality and viability of the town centre.

We submit therefore that the proposal to exclude the Showgrounds Retail Park from the PRC is unsound as it fails the following soundness tests:

Coherence and Effectiveness Tests

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

Remedy

Extend the PRC boundary to include the Showgrounds Retail Park site.

Draft Policy TCR01 – Town Centres

Draft Policy TCR01 – Town Centres also proposes the requirement to submit a full assessment of retail impact as well as need for all applications (including extensions) for retail development and town centre uses above a threshold of 500 sqm gross external area which are outside the Primary Retail Core.

The only clarification given in the DPS for the upper limit of 500 sqm is that it is deemed to be in keeping with the existing scale of retail development in the Council area where the average unit size in Omagh Town Centre in 2016 was 197 sqm. However this average unit size should not form the basis for determining the threshold above which assessment of retail impact and need are required since assessments of retail impact consider the likely impact of a retail proposal on a centre or core area as a whole and not on individual units. In retail impact terms, planning policy does not seek to protect individual commercial interests.

In any case, the threshold for the requirement for assessments of retail impact in Northern Ireland has long been that of major retail development (over 1,000 sqm gross retail floorspace) as per the previous PPS5 and the current SPPS (para. 6.283). It is also worth noting that policy elsewhere in the UK sets the thresholds for the assessment of retail impact at 2,500 sqm gross floorspace (see **Annex 1** to this submission for relevant excerpts)¹

¹ National Planning Policy Framework, July 2018 (Section 7 – Ensuring the vitality of town centres).

We submit therefore that a threshold of 500 sqm above which a full assessment of retail impact and need is too low, as it will place an onerous burden on those wishing to obtain approval for new retail developments in a town centre location outside the PRC. This runs contrary to both the RDS and the SPPS which both recognise the promotion of established town centres as the first choice location for retailing and other complementary functions (DPS, para. 4.27).

Soundness

The proposal to require the submission of a full assessment of retail impact as well as need for all applications (including extensions) for retail development and town centre uses above a threshold of 500 sqm gross external area which are outside the Primary Retail Core is unsound as it appears it is not founded on a robust evidence base and is therefore unsound for the following reason:

Coherence and Effectiveness Tests

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

Remedy

We submit that the threshold requiring the submission of a full assessment of retail impact as well as need for all applications (including extensions) for retail development and town centre uses which are outside the Primary Retail Core should be set at least 1,000 sqm consistent with previous policy in Northern Ireland and current regional retail planning policy.

We trust that these comments will be taken into account in the preparation of the Plan Strategy.

Yours faithfully,



M KELLY

Associate Director

Gravis Planning.

ANNEX 1

7. Ensuring the vitality of town centres

85. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:
- a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
 - b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
 - c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
 - d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
 - e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
 - f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
86. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
87. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
88. This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

89. When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace). This should include assessment of:
- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
90. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.

Subject Policies

A Successful, Sustainable Place

Promoting Town Centres

NPF and wider context

58. NPF3 reflects the importance of town centres as a key element of the economic and social fabric of Scotland. Much of Scotland's population lives and works in towns, within city regions, in our rural areas and on our coasts and islands. Town centres are at the heart of their communities and can be hubs for a range of activities. It is important that planning supports the role of town centres to thrive and meet the needs of their residents, businesses and visitors for the 21st century.

59. The town centre first principle, stemming from the Town Centre Action Plan, promotes an approach to wider decision-making that considers the health and vibrancy of town centres.

Policy Principles

60. Planning for town centres should be flexible and proactive, enabling a wide range of uses which bring people into town centres. The planning system should:

- apply a town centre first policy³³ when planning for uses which attract significant numbers of people, including retail and commercial leisure, offices, community and cultural facilities;
- encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening;
- ensure development plans, decision-making and monitoring support successful town centres; and
- consider opportunities for promoting residential use within town centres where this fits with local need and demand.

Key Documents

- [National Review of Town Centres External Advisory Group Report: Community and Enterprise in Scotland's Town Centres](#)³⁴
- [Town Centre Action Plan – the Scottish Government response](#)³⁵
- [Planning Advice Note 59: Improving Town Centres](#)³⁶
- [Planning Advice Note 52: Planning and Small Towns](#)³⁷

33 A town centre first policy is intended to support town centres, where these exist, or new centres which are supported by the development plan. Where there are no town centres in the vicinity, for example in more remote rural and island areas, the expectation is that local centres will be supported. The town centre first policy is not intended to divert essential services and developments away from such rural areas. See section on Rural Development.

34 www.scotland.gov.uk/Resource/0042/00426972.pdf

35 www.scotland.gov.uk/Publications/2013/11/6415

36 www.scotland.gov.uk/Publications/1999/10/pan59-root/pan59

37 www.scotland.gov.uk/Publications/1997/04/pan52

- [Town Centres Masterplanning Toolkit](#)³⁸

Development Plans

61. Plans should identify a network of centres and explain how they can complement each other. The network is likely to include city centres, town centres, local centres and commercial centres and may be organised as a hierarchy. Emerging or new centres designated within key new developments or land releases should also be shown within the network of centres. In remoter rural and island areas, it may not be necessary to identify a network.

62. Plans should identify as town centres those centres which display:

- a diverse mix of uses, including shopping;
- a high level of accessibility;
- qualities of character and identity which create a sense of place and further the well-being of communities;
- wider economic and social activity during the day and in the evening; and
- integration with residential areas.

63. Plans should identify as commercial centres those centres which have a more specific focus on retailing and/or leisure uses, such as shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres. Where necessary to protect the role of town centres, plans should specify the function of commercial centres, for example where retail activity may be restricted to the sale of bulky goods.

64. Local authorities, working with community planning partners, businesses and community groups as appropriate, should prepare a town centre health check. Annex A sets out a range of indicators which may be relevant. The purpose of a health check is to assess a town centre's strengths, vitality and viability, weaknesses and resilience. It will be used to inform development plans and decisions on planning applications. Health checks should be regularly updated, to monitor town centre performance, preferably every two years.

65. Local authorities, working with partners, should use the findings of the health check to develop a strategy to deliver improvements to the town centre. Annex A contains guidance on key elements in their preparation.

66. The spatial elements of town centre strategies should be included in the development plan or supplementary guidance. Plans should address any significant changes in the roles and functions of centres over time, where change is supported by the results of a health check. Plans should assess how centres can accommodate development and identify opportunities.

67. There are concerns about the number and clustering of some non-retail uses, such as betting offices and high interest money lending premises, in some town and local centres. Plans should include policies to support an appropriate mix of uses in town centres, local centres and high streets. Where a town centre strategy indicates that further provision of particular activities would undermine the character and amenity of centres or the well-being of communities, plans should include policies to prevent such over-provision and clustering.

³⁸ <http://creatingplacescotland.org/people-communities/policy/town-centre-masterplanning-toolkit#overlay-context=people-communities/policy>

68. Development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities. This requires that locations are considered in the following order of preference:

- town centres (including city centres and local centres);
- edge of town centre;
- other commercial centres identified in the development plan; and
- out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes.

69. Planning authorities, developers, owners and occupiers should be flexible and realistic in applying the sequential approach, to ensure that different uses are developed in the most appropriate locations. It is important that community, education and healthcare facilities are located where they are easily accessible to the communities that they are intended to serve.

Development Management

70. Decisions on development proposals should have regard to the context provided by the network of centres identified in the development plan and the sequential approach outlined above. New development in a town centre should contribute to providing a range of uses and should be of a scale which is appropriate to that centre. The impact of new development on the character and amenity of town centres, local centres and high streets will be a material consideration in decision-making. The aim is to recognise and prioritise the importance of town centres and encourage a mix of developments which support their vibrancy, vitality and viability. This aim should also be taken into account in decisions concerning proposals to expand or change the use of existing development.

71. Where development proposals in edge of town centre, commercial centre or out-of-town locations are contrary to the development plan, it is for applicants to demonstrate that more central options have been thoroughly assessed and that the impact on existing town centres is acceptable. Where a new public building or office with a gross floorspace over 2,500m² is proposed outwith a town centre, and is contrary to the development plan, an assessment of the impact on the town centre should be carried out. Where a retail and leisure development with a gross floorspace over 2,500m² is proposed outwith a town centre, contrary to the development plan, a retail impact analysis should be undertaken. For smaller retail and leisure proposals which may have a significant impact on vitality and viability, planning authorities should advise when retail impact analysis is necessary.

72. This analysis should consider the relationship of the proposed development with the network of centres identified in the development plan. Where possible, authorities and developers should agree the data required and present information on areas of dispute in a succinct and comparable form. Planning authorities should consider the potential economic impact of development and take into account any possible displacement effect.

73. Out-of-centre locations should only be considered for uses which generate significant footfall³⁹ where:

- all town centre, edge of town centre and other commercial centre options have been assessed and discounted as unsuitable or unavailable;

³⁹ As noted at paragraph 69, a flexible approach is required for community, education and healthcare facilities.

- the scale of development proposed is appropriate, and it has been shown that the proposal cannot reasonably be altered or reduced in scale to allow it to be accommodated at a sequentially preferable location;
- the proposal will help to meet qualitative or quantitative deficiencies; and
- there will be no significant adverse effect on the vitality and viability of existing town centres.

Promoting Rural Development

NPF Context

74. NPF3 sets out a vision for vibrant rural, coastal and island areas, with growing, sustainable communities supported by new opportunities for employment and education. The character of rural and island areas and the challenges they face vary greatly across the country, from pressurised areas of countryside around towns and cities to more remote and sparsely populated areas. Between these extremes are extensive intermediate areas under varying degrees of pressure and with different kinds of environmental assets meriting protection. Scotland's long coastline is an important resource both for development and for its particular environmental quality, especially in the areas of the three island councils.

Policy Principles

75. The planning system should:

- in all rural and island areas promote a pattern of development that is appropriate to the character of the particular rural area and the challenges it faces;
- encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality; and
- support an integrated approach to coastal planning.

Key documents

- [Getting the Best from Our Land – A Land Use Strategy for Scotland](#)⁴⁰
- National Marine Plan

Delivery

76. In the pressurised areas easily accessible from Scotland's cities and main towns, where ongoing development pressures are likely to continue, it is important to protect against an unsustainable growth in car-based commuting and the suburbanisation of the countryside, particularly where there are environmental assets such as sensitive landscapes or good quality agricultural land. Plans should make provision for most new urban development to take place within, or in planned extensions to, existing settlements.

77. In remote and fragile areas and island areas outwith defined small towns, the emphasis should be on maintaining and growing communities by encouraging development that provides suitable sustainable economic activity, while preserving important environmental assets such as landscape and wildlife habitats that underpin continuing tourism visits and quality of place.

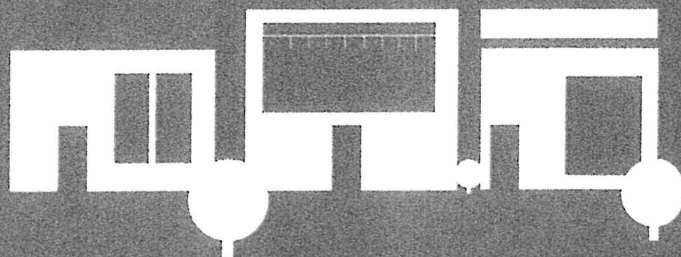
78. In the areas of intermediate accessibility and pressure for development, plans should be tailored to local circumstances, seeking to provide a sustainable network of settlements and a

⁴⁰ www.scotland.gov.uk/Publications/2011/03/17091927/0



Llywodraeth Cymru
Welsh Government

Retail and Commercial Development

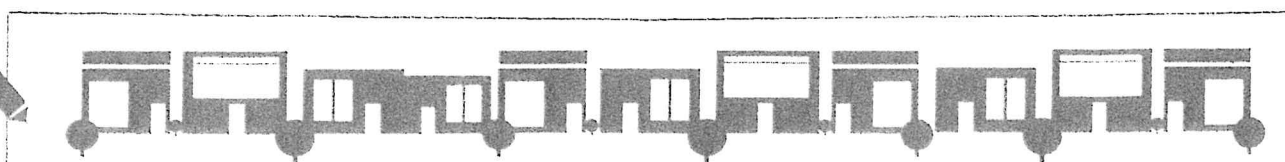


Technical Advice Note 4

November 2016

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1. Introduction

1.1 This Technical Advice Note (TAN) should be read in conjunction with Planning Policy Wales (PPW) which sets out the land use planning policies of the Welsh Government. PPW, TANs and Circulars should be taken into account by local planning authorities in Wales in the preparation of Development Plans. They may be material to decisions on individual planning applications and will be taken into account by Inspectors and the Welsh Government in the determination of appeals and called-in planning applications.

1.2 Technical Advice Note (TAN) 4 – Retailing and Town Centres (1996) is hereby cancelled.

2. Objectives

The Welsh Government's objectives for retail and commercial centres are to:

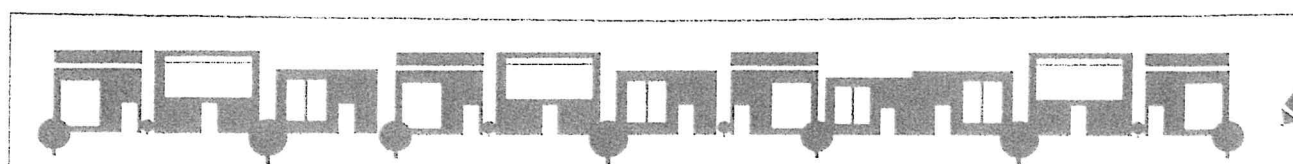
- Promote viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business.
- Sustain and enhance retail and commercial centres vibrancy, viability and attractiveness.
- Improving access to, and within, retail and commercial centres by all modes of transport, especially walking, cycling and public transport.

Objective 1 - Promote viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business

2.1 Planning Policy Wales recognises that retail and commercial centres are the focal point for shopping, leisure and tourism, local services and business/employment opportunities. This 'town centres first' approach ensures, through policy and decision making, that retail and commercial centres should be the first choice location in assessing the most appropriate places for a wide variety of developments. The co-location of these uses and their high levels of accessibility by a range of transport options make them sustainable locations.

2.2 Urban and rural retail and commercial centres, whilst having different contexts, are both focal points for economic activity. TAN6¹ provides further advice on planning for rural services and the economy. However, it is important for rural local planning authorities to ensure that the strategies for their area assess local requirements for additional services and they are planned in a co-ordinated manner through the development plan system.

2.3 A wide range of uses are located in retail and commercial centres including retail, office, residential, leisure, tourism and community functions. These centres are traditionally characterised by having higher densities which increases scope for different uses, including residential, to be accommodated above retail and commercial floorspace. Encouraging people to live and work in existing centres reinforces local demand and provides additional vibrancy during the day and in the evening. This diversity of uses, whilst benefiting the wider economy, will need to be carefully planned and managed to ensure that no conflicts arise, particularly with regards to amenity.



2.4 In order for these centres to be sustainable in the longer term they need to react to changes in the market place and adapt to the changing needs of society. Planning policies and development management decisions also need to take account of these changes, whilst ensuring that retail and commercial centres remain sustainable in the longer term.

Objective 2 - Sustain and enhance retail and commercial centres vibrancy, viability and attractiveness

2.5 Not all retail and commercial centres have been able to respond to changes in the sector as quickly or as effectively as others to ensure their vibrancy in the longer term. Welsh Government policy objectives, through planning and other initiatives seek to ensure that viable centres have a positive future; through flexible planning policies and targeted investment in physical regeneration which form part of a comprehensive strategy or plan for their area.

2.6 The planning system's role in creating vibrant, viable and attractive retail and commercial centres is two fold: firstly in creating a positive and flexible policy environment for retail and commercial centres which recognises the individual needs and potential of each centre and planning for their futures in a co-ordinated way (see below) and; secondly, taking other policy and development management decisions which do not undermine the importance of retail and commercial centres and the sustainable locations they offer for businesses and the community.

Objective 3 - Improving access to, and within, retail and commercial centres by all modes of transport, especially walking, cycling and public transport

2.7 Good access to, and within, retail and commercial centres is key, both to the vibrancy of those places and to ensure that everyone in society has access to the wide variety of goods and services. Ensuring that this access is sustainable in nature by promoting the ability to walk, cycle or use public transport to get to retail and commercial centres is important in this regard.

2.8 Once at a centre, it should be easy for people to access services through sensitively designed² public realm schemes and access to buildings which meet statutory requirements³. New development proposals will need to consider their internal layout and accommodate appropriate facilities for disabled people and their families. Consultation with relevant stakeholders in the design of new public areas is therefore essential.

3. Development Plans

3.1 Through development plan policies and supplementary guidance, local planning authorities should develop their retail evidence base and plan positively to protect and enhance the vibrancy, viability and attractiveness of their retail and commercial centres.



3.2 Local planning authorities should also work together when establishing their retail evidence bases and strategies, not only to identify cross boundary issues but also to better understand how their retail hierarchies fit in to the larger than local area (defined as larger than a single local authority). Retail catchment areas of established retail and commercial centres do not necessarily reflect local authority boundaries. Local planning authorities should consider the role and functions of such centres in relation to development plan allocations, policies and strategies.

4. Defining retail and commercial centre hierarchies

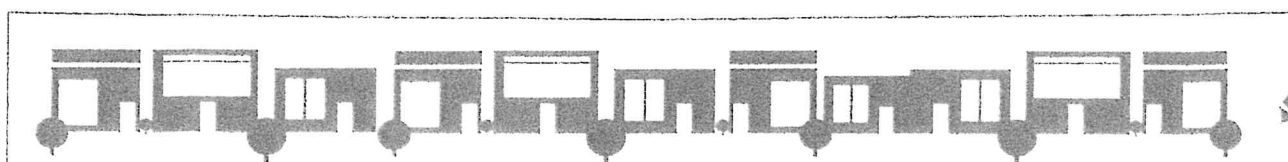
4.1 In guiding development to the most appropriate location, local planning authorities, in their development plans, should develop a local hierarchy to classify their various retail and commercial centres, and apply appropriate policies to those centres based on their characteristics. This locally-driven approach to defining higher and lower order centres is seen as most appropriate as urban and rural areas will have different scales and characteristics which cannot be defined consistently at the national level.

4.2 Higher order retail and commercial centres need to be accessible to a large number of people, and the scale and diverse range of uses present will reflect the needs of a population that is normally greater than the local community. Higher order centres are typically characterised by combinations of shops, offices, financial & professional services, food and drink establishments, hotels, education facilities, entertainment and leisure, non residential institutions as well as residential.

4.3 Lower order centres are characterised by smaller scale provision and fewer uses with the intention of primarily serving the needs of a local community. Lower order centres will typically include shops, financial & professional services, food and drink, and non residential institutions of an appropriate scale, but depending on the centre may include other uses.

4.4 In considering where centres may lie in relation to the retail hierarchy, local planning authorities should also take into account the likely future status of that centre. For example, if, as part of the retailing strategy a centre has been identified for growth and new sites allocated, then this should be reflected in the status of that centre. Likewise, if the strategy is to manage the decline of a centre, this should also be reflected in that centre's position in the hierarchy.

4.5 Once the hierarchy has been established, appropriate policies may be developed for different types of retail and commercial centre. These will primarily relate to changes of use of existing buildings and how flexible a local planning authority wishes to be in dealing with such applications, in accordance with their retail strategy and how they foresee retail and commercial centres developing in the future.



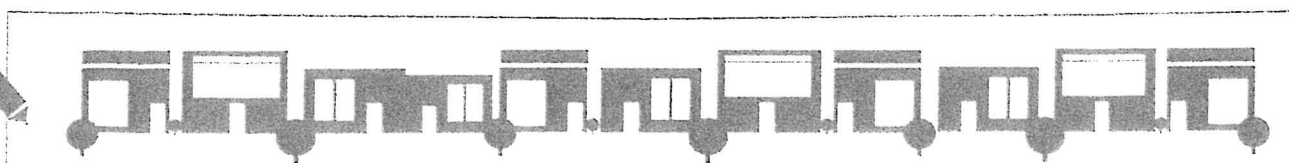
4.6 Out of centre retail parks whose development has been based solely on retailing should not normally be included in the local hierarchy. However, this should not preclude these destinations being assessed against locally-set criteria on the range and choice of services and the scale and nature of the retail floorspace, to ascertain if, through time, these centres have matured into retail and commercial centres in their own right, offering the same level of service provision and being as accessible as traditional centres. This process is intrinsically linked to the sequential approach to allocating new development sites; it should therefore be undertaken in the formulation of development plans and not on a case-by-case basis in relation to specific development proposals which arise outside of this process.

5. Retail Strategies, Masterplanning and Place Plans

5.1 The development plan should include a clear strategy for retail and commercial centres which sets out how the local planning authority wishes to see those areas develop over the plan period. This strategy should be developed with colleagues in local authority regeneration, economic development, public protection and estates departments, as well as stakeholder involvement from retail and commercial centre businesses, community groups and local chambers of commerce amongst others. Complementarity with the Single Integrated Plan or Well-being Plan is also important to ensure matters wider than the planning system, but which may have land use issues, are considered. Other factors affecting the quality of retail and commercial centres lie outside the planning system but can be important in supporting or complementing the aims of planning strategies set out in development plans. Effective management of retail and commercial centres through strategies, plans and where relevant by Town Centre Managers, can help to enhance their vibrancy, attractiveness and viability.

5.2 If a need (see Section 6) for further retail development has been identified the local planning authority will need to express through their retail strategy and development plan allocations how that need should be accommodated. For example: if there is an identified quantitative need of 2,500 sq. m of convenience floorspace alternative options might be to focus that provision in one large store or several smaller stores. Investigations of current provision levels would be needed to be evidenced together with consultation undertaken with stakeholders and communities to ascertain the most appropriate provision.

5.3 If that need requires new sites to be identified then local planning authorities should seek to identify sites within established retail and commercial centres depending on the scale of provision. If after investigation suitable sites within established centres are not available local authorities should consider whether a centre's boundaries should be extended in order to meet the need identified before out of centre sites are considered (see further guidance on the sequential test in section 7). The identification of these sites will need to take into account their availability and deliverability for new development within the plan period as well as the opportunities to regenerate or support retail and commercial centres through new development.



5.4 Similarly, if a retail and commercial centre has been identified as being in decline to the point of no longer being viable, this change should be managed as part of the retail strategy. This management, which will take a holistic approach in the planning for retail and commercial provision, should ensure that communities retain access to the goods and services which they require.

5.5 As part of the wider development plan vision, the local planning authority will also need to consider if new areas of growth will be adequately provided for in land use terms, and make appropriate provision within their retail strategy to accommodate this to ensure this strategic growth is focused on the most suitable locations.

5.6 Area-wide strategies, Place Plans, or masterplans should outline a vision for the centre setting out the land-use implications. Masterplans and strategies should be developed by local planning authorities in partnership with relevant stakeholders. Place Plans may also be an appropriate mechanism for outlining a strategic approach for a particular centre.

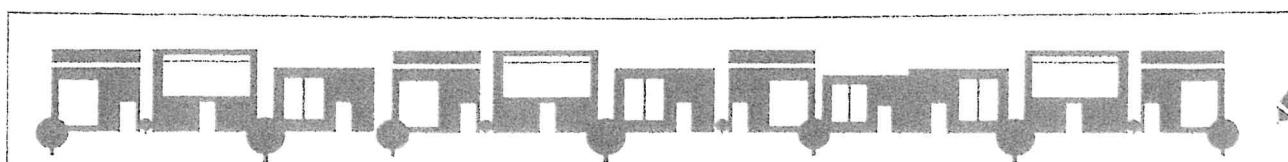
5.7 The night time economy is important for many retail and commercial centres. The benefits of developing this activity are that these centres are economically buoyant at various times of the day, adding their vibrancy and attractiveness. Issues surrounding public safety and amenity should be carefully considered. Retail and commercial centre strategies can help identify these aspects and how they relate to specific centres with land use planning policies and other initiatives identified in order to balance and address them.

5.8 Once developed, strategies, masterplans and Place Plans will have a dual role. Firstly they can be used to inform the evidence base behind policies within the development plan; this includes justification for new site allocations. Secondly, following the adoption of the development plan, they can be adopted as supplementary guidance to aid the implementation of policies and to resist inappropriate proposals, to help ensure that the vision for the retail and commercial centre is realised.

5.9 Supplementary guidance can also be useful in examining detailed issues surrounding retail and commercial centres, such as the treatment of the public realm or setting out the local planning authorities specific requirements for particular sites or areas within a centre.

6. Tests of Retail Need

6.1 The tests of retail need are the starting point for planning for new retail development in both development plans and development management. The quantitative needs test is based on forecasting of expenditure on a certain type of retail good (comparison or convenience for example) over a period of time, which is then assessed against the current level of provision. Any shortfall in the provision is then expressed, using expenditure per square metre calculations, as the level of new retail provision required.



6.2 The requirement to consider need for a development is not relevant for retail proposals within a defined retail and commercial centre in a development plan. However it will be required for any application in an edge-of-centre or out-of-centre location which is not in accordance with an adopted development plan.

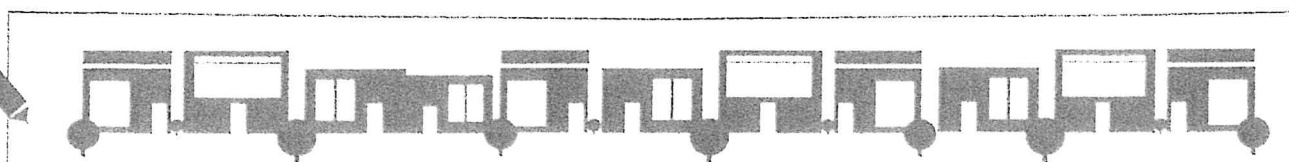
6.3 The quantitative retail needs tests is a consistent way of calculating future retail provision. However the data used in these needs assessments can be sensitive to small changes, potentially altering the result. The Welsh Government does not prescribe any particular methodology for undertaking assessments and it is up to each local planning authority to be satisfied with quantitative retail need evidence in policy making or the development management process. Local planning authorities and developers should therefore ensure assessments are prepared in a clear logical and transparent way with the use of robust and realistic evidence. Such assessments usually include:

- Existing and forecasted population levels and distribution.
- Forecast expenditure for specific classes of goods to be sold, within the broad categories of comparison and convenience goods, which are provided at the lowest geographical area possible to reflect local circumstances.
- Sales density data for both existing and future retail provision which is realistic and benchmarked against similar retail developments in the area; and
- Catchment areas for centres and individual stores which reflect the size and scale of the development and the likely draw of a particular scheme.

6.4 Quantitative retail needs assessments can then feed into the retail strategy for the development plan where local planning authorities should make decisions on the future type, location and scale of new retail development which best supports the delivery of the overall development plan vision and the needs of the communities involved.

6.5 Planning Policy Wales is clear in the requirement to establish a quantitative retail need before other, qualitative aspects of need are considered. Where the current provision is sufficient, the need for further allocations must be fully justified in the development plan and supporting evidence.

6.6 Qualitative need is harder to justify and proposals based on this approach should be closely scrutinised to ensure that their development does not have unintended consequences and detrimental impact on existing retail activity within retail and commercial centres. The overall objective of applying the qualitative need approach would be to achieve an appropriate distribution and range of sites for retail stores which meets the needs of all communities, particularly of those in rural or deprived areas where existing provision is inadequate. These issues could be considered as part of the overall retail strategy for an area (see Section 4).



6.7 Planning Policy Wales highlights cases where qualitative need may be justified. It is unlikely that any of these aspects on their own could justify new retail development; rather a combination of several of these issues could make the case for further provision. These could include proposals which:

support the objectives and retail strategy of an adopted development plan or the policies in this guidance.

This may be where a retail development is linked to a large area of growth which is not currently served by any form of retail development.

are highly accessible by walking, cycling or public transport and/or contributes to a substantial reduction in, or alleviation of, car journeys, traffic congestion or over-trading.

Current travel patterns for communities to access existing retail provision may be problematic or result in extended and unreasonable travel times. This may be as a result of the store over-trading which is defined as the expenditure in store significantly exceeding anticipated or market average levels. Proposals which are well-located within existing communities may be able to assist to alleviate some of these issues.

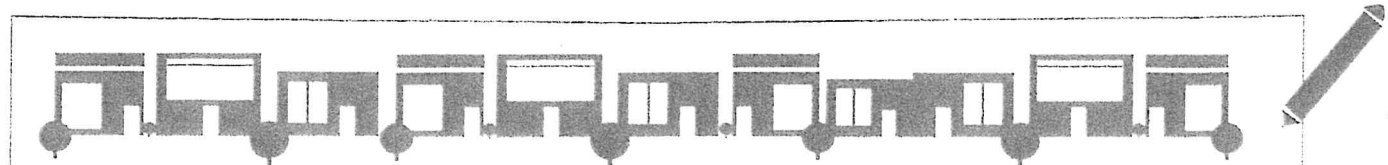
contribute to the co-location of facilities in retail and commercial centres identified in the retail hierarchy; and/or significantly contributes to the vibrancy, attractiveness and viability of such a centre.

Existing provision in a retail and commercial centre may lack a certain type of development which is impacting on its ability to draw people from its catchment and reach its potential. Proposals for additional types of development could therefore be justified although these would need careful management by conditions to ensure those uses which will strengthen the centre are delivered.

address locally defined deficiencies and alleviates a lack of convenience provision in a disadvantaged area.

This relates to the ability of all communities and disadvantaged areas in particular to access the goods and services which they need on a day to day basis. Current provision may not meet these requirements resulting in expensive, unnecessary trips further afield. Local provision to meet this need would therefore be a positive step for these communities. Localised deficiencies may also arise when new residential development has recently been constructed.

6.8 Planning Policy Wales also advises that regeneration and additional employment benefits are not considered qualitative need factors in retail policy terms, though they may be material considerations in making a decision on a planning application. If there is no



quantitative retail need for a proposal the net impact on employment may be negligible as there may be economic impacts on existing stores in the area which would require them to reduce their staff numbers as a result. A local planning authority would need to fully investigate such cases, taking a holistic approach, before considering whether to approve such schemes on this basis.

7. The Sequential Test

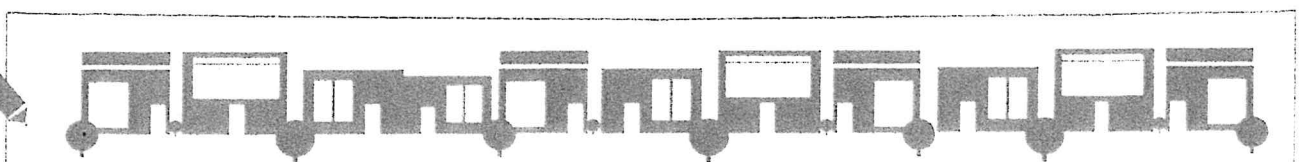
7.1 The sequential test supports the Welsh Government's policy objective of promoting centres identified in the retail and commercial centre hierarchy, as the most sustainable locations to live, shop, socialise and conduct business. Development plan site allocations or planning applications for retail, leisure and other complementary uses should be subject to the sequential test. The sequential location of development plan allocations or planning applications should be considered in the following order:

- Firstly, within retail and commercial centres identified in the retail hierarchy where suitable sites, or buildings for conversion are available. Where this relates to a development plan allocation, they must be available for development within the plan period. Local planning authorities should ensure that any development plan allocation or planning application is of an appropriate scale in relation to the role and function of the centre.
- If no suitable sites are available in retail and commercial centres then edge-of-centre locations should be considered, with preference given to brownfield sites that are or will be well connected to the existing centre and accessible by a variety of means of transport, particularly walking, cycling and public transport.
- Only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out-of-centre options within, and then outside, a settlement area be considered. Where out of centre sites are concerned preference should be given to brownfield sites which are or will be well served by a choice of means of transport and are close to an established retail and commercial centre.

Suitability

7.2 Suitability refers to a site or building's attributes and whether these are sufficient to meet the development requirements of a particular proposal. Where a developer favours a development site on the edge of or outside a retail and commercial centre the developers will need to provide evidence to explain why potential sites or buildings within the centre are unable to accommodate the format, scale and design of a proposed development. This exercise should not necessarily be confined to an individual centre and developers should consult with the local planning authority to ascertain the extent of any search for other potentially suitable sites or buildings within the wider catchment area.

7.3 When a need for further convenience or comparison shopping provision is established as part of the development plan preparation process the local planning authority should consider how different retail formats, could be accommodated on a site. Where allocated



sites are on the edge of or outside retail and commercial centres local planning authorities should give consideration to the possible consequences of any subdivision of units that may be proposed by developers in the future and whether measures are required to restrict any such proposals. Developers seeking to include sites in development plans should be flexible and innovative, and should examine carefully how sites in established centres may be able to accommodate their requirements.

7.4 When allocating sites or when determining applications that are in edge of centre locations, local planning authorities should consider the distance that a site is from the edge of a retail and commercial centre for it to be accessible by foot. Wherever possible edge of centre site allocations or development proposals should be located adjacent to a designated retail and commercial centre boundary, where this is not the case it should not normally be more than 200 to 300 metres from the edge of the centre. Factors such as the size of the retail and commercial centre, local topography and presence of physical barriers to access may influence any assessment. It may be appropriate to use a shorter acceptable distance between the centre and the development proposal if the centre is small. Local planning authorities should consider whether to specify advice in their LDP about accessible distances from retail and commercial centres to edge of centre developments.

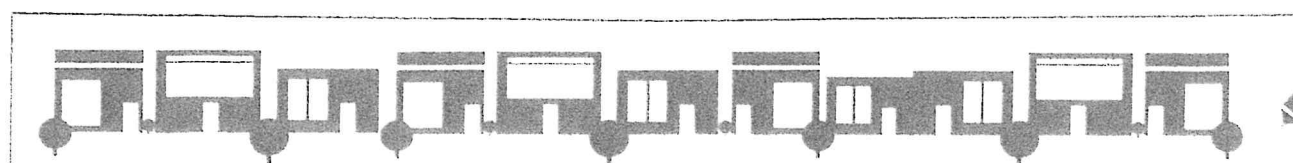
7.5 Developers and retailers should be flexible and innovative about the format, design and scale of proposed development and the amount of car parking needed, tailoring these to fit local circumstances. In particular, developers proposing large scale retail and/or leisure developments with a large quantity of car parking are encouraged to consider whether or not elements of their proposal could be located on a site or number of sites in a centre, rather than automatically seeking to locate on a single edge of centre or out-of-centre site. Such an approach could take advantage of shared parking facilities. The use of masterplans or Place Plans by local planning authorities could help facilitate such an approach.

Availability

7.6 Local planning authorities should identify, in consultation with stakeholders and the community, an appropriate range of sites to allow for the accommodation of identified need in the development plan. Identified sites should be capable of being brought forward for development during the development plan period. Consideration should be given to the needs of the community where the demand for retail and leisure provision (and other complementary uses) has been identified. Where phasing is a consideration priority should be given to sites in established centres and sites in areas of poor provision.

8. Retail Impact Assessments

8.1 Planning Policy Wales identifies the issues local planning authorities should take in to account when allocating new sites or determining planning applications for retail or other uses complementary to a retail and commercial centre (including redevelopment, extensions or the variation of conditions).



8.2 Retail applications of 2,500 sq. metres or more gross floorspace that are proposed on the edge of or outside retail and commercial centres should be supported by a retail impact assessment provided by the developer. Local planning authorities should undertake impact assessments to evidence a site identified in a development plan to meet a need of 2,500 sq. metres or more. Smaller retail planning applications or site allocations may also be assessed where local planning authorities believe it will have a significant impact on a retail and commercial centre. Requests for retail impact assessments by local planning authorities on smaller developments should be proportionate to potential impacts.

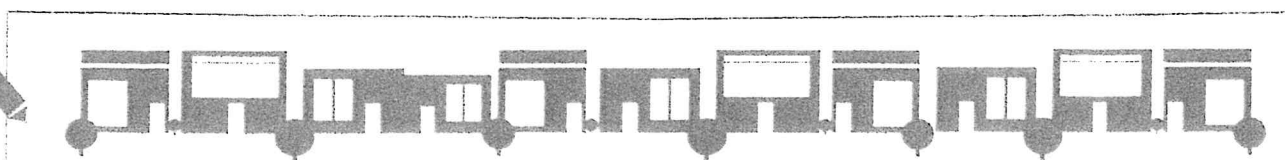
8.3 In addition to the needs and sequential tests, planning applications for retail developments on the edge of or outside a retail or commercial centre that are not in accordance with the development plan should be assessed against a range of impact criteria, for example:

- Impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area.
- Impact of the proposal on centre vitality and viability, including local consumer choice and range and quality of the comparison and convenience retail offer.
- Consideration of the cumulative effects of the development proposal in relation to any outstanding planning permissions.
- The impact of the proposal on allocated sites outside centres being developed in accordance with the development plan.
- Impact of the proposal on in centre trade and turnover in the centre and other centres in the wider area, taking account of current and future consumer expenditure capacity in the catchment area.
- Assessment of the proportion of customers using the development traveling by different modes of transport.
- Impact on travel patterns over the catchment area.
- Any significant environmental impacts.

9. Retail and Commercial Primary and Secondary Areas and Change of Use

9.1 Vibrant and viable centres are distinguished by a diversity of uses and activities. Where primary and secondary areas have been designated in established retail and commercial centres they can help promote and maintain an effective distribution and balance of uses and activities.

9.2 A primary area is generally characterised by a high proportion of A1 shopping uses, whilst a secondary area typically incorporates a broader mix of uses such as shops, and non A1 uses including cafes, restaurants, banks, other financial institutions, services, and other uses complementary to a retail and commercial centre. When the retail industry is buoyant and a centre's economic performance is strong such a distribution of uses is likely to be the most appropriate approach, and restrictions to non A1 uses in primary areas

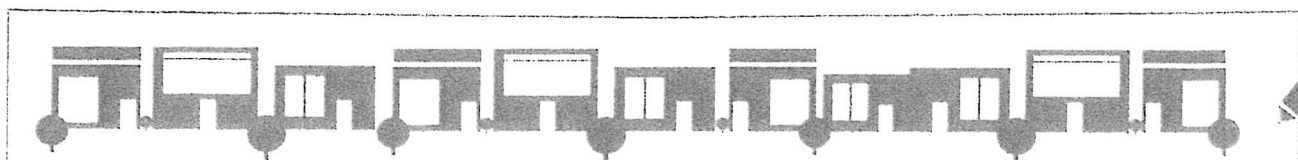


are likely to apply. However, when a retail and commercial centre's performance is poor, due perhaps to local or national economic conditions, and frontages become characterised by persistently high vacancy rates, local planning authorities should consider applying a more flexible strategy. Local planning authorities should decide if restricting change of use from A1 to non A1 uses in primary areas is the most effective strategy. In these circumstances over emphasis on A1 uses alone in primary areas may serve to weaken the centre's prospects of being vibrant and viable; making it more vulnerable to decline. The positive role that non A1 uses such as food and drink, financial, and other services can bring to both primary and secondary areas should be examined by local planning authorities. In addition, the role that residential uses can play in supporting centres should also be recognised. Whilst residential use is unlikely to be appropriate at ground floor level in primary areas, residential use on upper floors can add to a centres vibrancy and viability, increasing footfall and contributing to both the daytime and evening economies of a centre.

9.3 Flexibility to expand or contract primary and secondary areas and to allow changes of use to attract investment and diversify the range of businesses is essential within vulnerable or declining centres. In larger more diverse centres that are more resilient to downturns in the economy a more restrictive approach to change of use may still be appropriate. However, in smaller centres this may not be the case and a more restrictive approach to change of use could act against opportunities to strengthen a centre through greater diversity. Local planning authorities may choose not to define primary and secondary areas in smaller centres where decline is being experienced. Local planning authorities should recognise the role that a retail and commercial centres play and where structural change is occurring identify the most appropriate strategy to address this through their development plan and retail hierarchy.

9.4 Restaurants together with some cafes/coffee shops can provide diversity and vibrancy in centres, increasing the period of time a shopper spends in a centre as well as providing places for social and business interaction. However, individual use classes may contain both desirable and undesirable forms of activity which when clustered together may have a negative cumulative impact. Planning conditions may be used to ensure the most appropriate development is permitted within a use class. The use of Local Development Orders can promote more positive approaches to diversification in established centres.

9.5 Long term vacant property can have a detrimental affect on the appearance and economic performance of a centre. Temporary or 'pop-up' units may be a positive short term option to reduce the impact of vacancies. A pop-up-unit is established on a short term lease through agreement with the landlord and where such shops are successful may lead to a long term tenancy. Whilst pop-up-units are typically used for shops they can be used for other purposes, for example, art galleries and community projects. Local planning authorities should consider using supplementary planning guidance to describe the types of pop-up uses likely to be acceptable in a retail and commercial centre and how they may, if necessary, be controlled through the planning system.



Changes of Use

9.6 The Town and Country Planning (Use Classes) Order, sets out where changes of use between use classes are permitted and do not require planning permission.

9.7 Changes of use can create new concentrations of single uses, such as take away food outlets, where the cumulative effects can cause local problems. Such proposals should be assessed against the development plan policies, on their contribution to diversification of the retail and commercial centre and on the cumulative effects on matters such as parking and local residential amenity.

10. Retail Planning Conditions

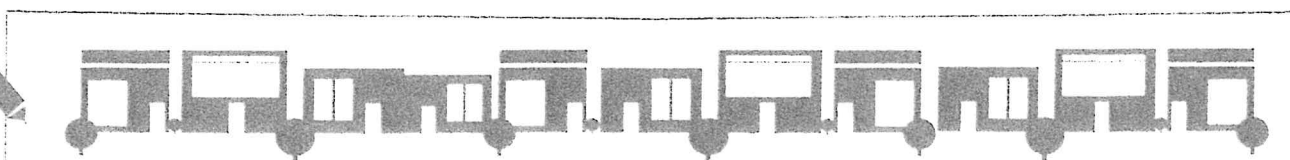
10.1 Local planning authorities should use planning conditions to ensure that the character of a development cannot subsequently be changed to create a form of development that would be unacceptable. For example, retail parks can change their composition over time and could in some circumstances create a development that the local planning authority would have refused due to its impact on the vitality and viability of an existing retail and commercial centre.

10.2 Planning conditions are normally applied to restrict or control goods sold, changes of use, division of units, internal increases in floorspace (mezzanine floors) and ancillary uses. Welsh Government Circular WGC 016/2014 – The Use of Planning Conditions for Development Management (2014) sets out how and when conditions should be used, and includes examples of possible planning conditions.

10.3 When considering applying conditions to restrict the sale of goods in out of town developments local planning authorities should consider what items if sold would have an adverse impact upon any established centre and apply an appropriate term, for instance food and drink, or limit the use to the sale of particular items. Any conditions imposed on the types of products sold should only refer to the main categories of goods for example, food and convenience goods, hardware, electrical goods, furniture and carpets and should not seek to control details of particular products to be sold.

10.4 In terms of restricting changes of use, a condition may prevent the change of use of a large retail premises to a food or convenience goods supermarket, where such use might generate an unacceptable level of additional traffic or have a damaging effect on the vitality of a nearby retail and commercial centre. Alternatively a percentage might be applied, for example limiting non-food retail to 30% of the gross retail floor space in a supermarket.

10.5 It may also be appropriate to impose conditions to control the number or size of units to prevent the development being subdivided into a large number of outlets (or vice versa), if the effect of such a change would be to change significantly the nature of the retail development to one that would not have been given permission.



10.6 Shops may be proposed as ancillary to other development such as, petrol stations, motorway service areas, airport terminals, industrial/employment areas, railway stations, sports stadia or other leisure, tourist and recreational facilities this is by no means an exhaustive list. Local planning authorities should ensure that in such cases the retail element is limited in scale and genuinely ancillary to the main development, and should seek to control this through the use of conditions.

10.7 Conditions can also be used by local planning authorities to resolve issues relating to the impact of the development on traffic and the amenity of neighbouring residents, such as the timing of the delivery of goods to shops. In considering restrictions on deliveries, local planning authorities should take account of all relevant factors, including impact on congestion, especially in peak periods. In considering how to mitigate night-time noise, local planning authorities should consider alternatives to a complete ban, such as including codes of practice in planning agreements relating to the number of vehicles and noise standards.

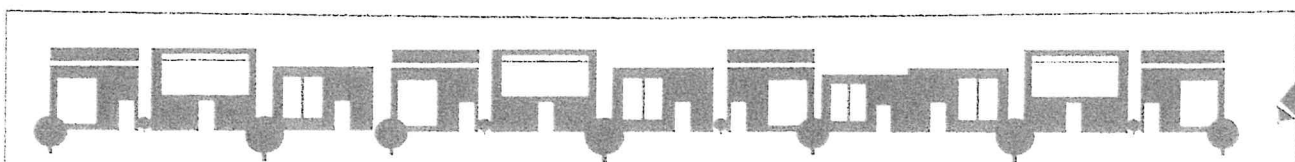
11. Mezzanine Floors in Retail Development

11.1 Mezzanines are a way of increasing floor space within a building. Whilst mezzanines can enable more efficient use of land, help generate increased turnover for a business, and in cases negate the requirement to develop elsewhere, they may in some cases undermine retail and commercial centres, generate additional traffic and increase parking requirements. The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2015 allows local planning authorities to control increases in internal floorspace. Developers are required to submit a planning application for mezzanine proposals greater than 200 square metres. The provision also ensures mezzanines do not undermine local development plan retail strategies. All new retail applications of 2,500 square metres or more of gross floorspace should be supported by an RIA. Local planning authorities may wish to apply an RIA to new mezzanine floor applications.

12. Local Development Orders

12.1 Local planning authorities are encouraged to consider how Local Development Orders (LDOs) can assist in the regeneration of retail and commercial centres. An LDO can grant planning permission for certain types of development within a specific area. Their purpose is to simplify the planning process by removing the need for developers to make a planning application. An LDO can cover a geographical area of any size within a local authority area.

12.2 LDOs can be a means of facilitating regeneration within a retail and commercial centre or be a catalyst for change. They can incentivise development and where successful help reduce vacancy rates leading to more vibrant and viable retail and commercial centres.



12.3 An LDO can make decisions on what is and is not acceptable in a designated area, for example, acceptable changes of use on ground or upper floors. LDO rights can be confined to specific developments or specified classes of development, but this is subject to limited exceptions. As with national permitted development rights, an LDO may also impose limitations, for example, by granting permission for a class of development but excluding specified types of development within that class, or development of that class which would be within a specified area or building.

12.4 Removing the requirement to submit a planning application has benefits for both the local planning authority and applicant. The local planning authority has the reassurance of predetermining acceptable uses and as a consequence may be able to direct resources to other schemes or priorities potentially reducing service costs. The applicant has greater certainty in terms of what development or changes of use are acceptable, has minimal engagement with the local authority resulting in lower costs.

13. Indicators of vitality and viability

13.1 Regular assessments or 'health checks' of retail and commercial centres provides one means of forming judgements about the impact of policies and developments.

13.2 The use of regular health checks provides a means of monitoring changes over time, and provides the local planning authority with a good understanding of the resilience of its retail and commercial centres to change, and to gauge the significance of the impact of new developments. Regular health checks can also help to inform plan making and development management decisions about the extent of the primary shopping and primary/secondary frontages area, for example, recognising where the role and function of different parts of the centre have changed over time. It is for the local planning authority to determine the frequency of health checks in their retail and commercial centres in order to build up a pattern of changes over time.

13.3 Local planning authorities may wish to use their own, locally specific, indicators as a means of monitoring change over time in their centres. However, the following information will be useful in measuring vitality, attractiveness and viability of established centres:

- turnover in relation to floorspace: turnover figures vary greatly and can be of assistance as an indication of the relative activity of different shopping areas and centres
- commercial yield on non-domestic property: (i.e. the capital value in relation to the expected market rental) may be of assistance in demonstrating the confidence of investors in the long-term profitability of the centre
- shopping rents: pattern of movement in primary shopping area rents (i.e. the frontage which attracts the highest rental value)
- retailer representation and change: present representation and demand from retailers wanting to come into the town, or to change their representation in the town, or to contract or close their representation



- the diversity of uses: how much space is in use for different functions, such as: offices; shopping; other commercial; cultural and entertainment activities; restaurants; hotels; educational uses; housing, and how that balance has been changing
- accessibility: the ease and convenience of access by a choice of means of travel, including the quality, quantity and type of car parking. The availability of public transport services and the quality of provision for pedestrians and cyclists
- pedestrian flow: the numbers and movement of people on the streets, in different parts of the centre at different times of the day and evening, and changes over time
- the proportion of vacant street level property: vacancies can arise even in the strongest town centres, and this indicator must be used with care
- customer views: regular surveys of customer views will assist authorities in monitoring and evaluating the effectiveness of town centre improvements and of town centre management
- environmental quality: this should include information on air quality, noise, trees, landscaping, open spaces, litter and graffiti
- perception of safety/occurrence of crime: this should include information on safety and security.

13.4 In addition to the data categories listed above information can also be collected through other monitoring processes. The Local Development Plan Annual Monitoring Report can be used to assess whether the policies contained within the plan are being implemented successfully and whether change is required. Also, where Local Development Orders have been adopted local planning authorities should seek to include targets that allow them to monitor the Order's success.

References

- ¹ Technical Advice Note 6 Planning for Sustainable Rural Communities, Welsh Government, July 2010
- ² Technical Advice Note 12 Design, Welsh Government, March 2016
- ³ See Part M of the Building Regulations

