

**Examination of the Spelthorne Core Strategy
and Policies DPD**

Topic Paper on Matter 7

Town Centres and Retail Development

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**Planning Services
Strategic Directorate (Community)
Borough of Spelthorne
Council Offices
Knowle Green
Staines
Middlesex
TW18 1XB**



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Town Centres and Retail Development

Key Issue: Does this part of the DPD make adequate provision for town centre development, is it consistent with national policy and does it add sufficient local distinctiveness?

1. Introduction

- 1.1 This Topic Paper begins by outlining the strategy towards town centres and retailing including its derivation from the evidence base and alternative options considered. It then responds to the specific questions posed by the Inspector.

2. Background

- 2.1 The Vision Statement (Core Strategy and Policies DPD, para 3.2) identifies town and other centres and locations accessible by non car-based travel as the location for uses with the potential to generate large amounts of traffic. In relation to specific centres, the Vision Statement adds that by 2026:

“Staines will have continued to develop its role as a major shopping centre and location for related services meeting the needs of North Surrey. The other centres of Ashford, Shepperton and Sunbury and other local centres and larger parades will have maintained their role in providing local shopping and other services.”

- 2.2 Objectives particularly relevant to town centres and retailing are “19” regarding the continued development of Staines, and “20” regarding the role of Ashford, Shepperton and Sunbury Cross.
- 2.3 The spatial strategy identifies (para 4.7) Staines for further retail growth, and the centres of Ashford, Shepperton and Sunbury to be maintained to meet local needs. Specific retail development is identified in Staines in the form of extensions to the Elmsleigh Centre and scope for further retail development in the longer term in the Two Rivers shopping area (para 8.11). Staines and the three other centres are also identified as employment areas (para 4.6) and Staines is identified as an area with particular scope for growth.
- 2.4 The relevant strategic policy (SP4) focuses retailing on town and local centres. It seeks the continued improvement of Staines by making provision for further developments and encouraging improvements in access, particularly by non car-based modes. It also looks to maintain the role of other centres seeking opportunities for their improvement, as well as maintaining the role of smaller parades serving local neighbourhoods.
- 2.5 Policy TC1 develops the approach of the strategic policy in relation to Staines. It sets out the specific policy initiatives that will be followed under four headings:
- a. Provision for new development
 - b. Improvements to traffic management and accessibility by other modes

- c. Parking
- d. Management of the town centre and environmental improvement

The provision in the policy for 32,000 sq m additional retail floorspace relates to the entire period to 2026 (see para 8.8). At this stage a specific allocation is being made for the extension of the Elmsleigh Centre to the south and west to provide for a total of approximately 20,500 sq m of retail floorspace in a mixed use development over two phases, which includes improvements to the bus station (see paras 8.9-8.10 and A10 of the Allocations DPD). The Council has also produced an initial planning brief for the site. The precise scale and nature of future growth after completion of the Elmsleigh Centre development will be reviewed in the light of an updated retail study (see para 8.11). This approach is taken because forecasting retail expenditure and consequent floorspace needs beyond a 10 year period becomes less certain in terms of the precise year at which further development might be required. The Council considers there is scope within the Two Rivers Scheme for extensions or partial redevelopment to provide for extra floorspace to meet the additional projected growth of floorspace to 2026. This scope is referred to at para 8.11. A scheme in this part of the town could be brought forward as an Allocation in a further Allocations DPD.

- 2.6 There is a clear distinction in Staines town centre between a primary area, consisting of the Two Rivers and Elmsleigh shopping centres and the pedestrianised section of the High Street, and two secondary areas to the east and west. The strategy for development of the town centre does not envisage the balance between primary and secondary areas changing and Policy TC2 sets out an approach to non-retail uses that seeks to maintain the dominance of retailing in the primary area, while allowing for a mix of retail and non-retail uses in the secondary area.
- 2.7 Policy TC3 develops the strategy in relation to the smaller town centres of Ashford, Shepperton and Sunbury Cross where the emphasis is on maintaining the current role rather than promoting growth. The retail study has shown there is no scope for any significant retail growth at these centres. Paras 8.20-8.22 provide a commentary on each centre. The policy covers:
 - a. Support for mixed use development
 - b. Control of change of use in the shopping frontage
 - c. Management and environmental improvements
- 2.8 Policy TC4 manages change in smaller local centres which play a role in local shopping provision.
- 2.9 In accordance with the overall strategy Policy TC5 is a development control policy setting out an approach to retail proposals giving preference to Staines and the Borough's other town centres, where development is appropriate in scale and character. It incorporates the sequential approach in PPS 6 Planning for Town Centres (CD/NAT/406).

- 2.10 The main evidence base for the town centre and retail policies is provided by the Spelthorne Retail Study 2004 (CD/SBC/16). This includes a review of existing provision, an assessment of the quantitative capacity for additional provision carried out by Cushman and Wakefield, an assessment of the quality of provision and a review of the vitality and viability of existing centres. The study was supported by comprehensive household and shopper surveys to determine existing patterns of expenditure and to gather views about existing town centres.
- 2.11 An update was published in 2007, Spelthorne Retail Study – Update of Forecasts (CD/SBC/17). No significant change has occurred in retail provision within Spelthorne since the 2004 Study and therefore the update focuses on the quantitative capacity assessment and its underlying assumptions.
- 2.12 The Annual Monitoring Report 2007 updates key town centre statistics, including floorspace, retail/non-retail uses and vacant units in the shopping frontage (see CD/SBC/29 Appendix 3). The 2007 Report on Non-Retail Uses in Shopping Areas (CD/SBC/18) contains information and commentary updated to June 2006.
- 2.13 The main findings from the studies regarding future provision are summarised below:
- a. The quantitative scope for additional convenience food floorspace is limited and an additional allocation in the Borough is not recommended (CD/SBC/16 para 4.2).
 - b. There is scope for more non-food retail floorspace. The Retail Study 2004 suggested there was scope for a further 17,000 sq m up to 2011 and a further 15,000 sq m to 2016. The 2007 update suggests there is less scope for growth up to 2016 (18,000 sq m) but scope for further growth up to and possibly beyond the 32,000 sq m total in Policy TC1. These figures are on the basis that provision is made in Staines in a way that enhances the overall attractiveness of the shopping centre (CD/SBC/16 paras 4.3-4.4 paras 4.1-4.5).
 - c. Staines is the most accessible large shopping centre serving Spelthorne. Its catchment area covers most of the Borough and also includes a significant area to the west and south of Spelthorne. It is therefore best placed to cater for future growth in spending and the only location in the Borough which Cushman and Wakefield advise further retail floorspace be provided.
 - d. The scope for further non-food growth in Ashford, Shepperton and Sunbury Cross is limited due to competition from other large centres and lack of existing scale for major national retailers. (CD/SBC/16 para 5.19 and Part 2 para 4.21). The retail study does see the need, where opportunities present themselves, to encourage improved provision of new and better quality floorspace attractive to national multiple and independent retailers. This would be by way of renewal, refurbishment and extension to individual premises, although not necessarily increasing the floorspace in these centres as a whole.

- e. There are two large out of centre food stores in the Borough. In addition there are some large food stores just outside the Borough that are accessible to Spelthorne residents. The great majority of the Borough is within five minutes drive time of a large food store and the whole Borough is within ten minutes drive time (CD/SBC/16 plan 4). (Note: This data excludes Waitrose in Staines town centre)
 - f. There is one DIY retail warehouse in the Borough but a range of others outside the Borough that are accessible to Spelthorne residents. The whole Borough is within ten minutes drive time of one store and nearly all within ten minutes drive time of two or more stores. There are also a number of other retail warehouses accessible to Spelthorne residents (CD/SBC/16) Table 4 and Plan 5b).
 - g. Given the current level of provision there is no qualitative need or additional retail warehousing (CD/SBC/16 para 5.38).
- 2.14 The vitality and viability of existing town centres was assessed in the 2004 Retail Study against a series of indicators based on Government guidance. These covered: diversity of uses, retailer representation, shopping rents, vacancies, pedestrian flows, accessibility, customer views and behaviour, safety and crime, and state of the environment. Information was collected by a variety of surveys including household and street interview surveys commissioned as part of the retail study (CD/SBC/16) para 6.1 and Part 3 for the detailed survey results).
- 2.15 Based on the review of vitality and viability, a series of key issues was identified for each town centre. (These are listed together in para 7.2 of CD1/SBC/16).
- 2.16 The Options Consultation took account of the findings of the Retail Study. Under the general heading of “How should our town centres develop in the future”, it sought views on two specific options (CD/SBC/16 para 3.41).
- 2.17 The first concerned further expansion of Staines town centre. While there was a significant minority who favoured keeping Staines to its present size, there was more support for providing further development in the town centre to maintain its competitiveness.
- 2.18 The second related to the continued role of Ashford, Shepperton and Sunbury Cross. A very large majority supported an approach of not allowing further loss of shops in these centres. This reflects a view emerging from the customer surveys carried out for the Retail Study which revealed that a high proportion of residents shopped regularly in their local town centre (see CD/SBC/16 para 6.55, 6.78 and 6.104).
- 2.19 In view of Government advice that options should be realistic, the consultation did not include the option of expanding Ashford, Shepperton or Sunbury Cross (due to consultancy advice on lack of market demand, see para 2.13 above, fourth bullet point, coupled with lack of available sites), or the option of expanding out of centre retailing (due to Government policy guidance in

support of town centres, now expressed in PPS 6 (CD/NAT/406) and the adequacy of existing provision, see para 2.13 above, fifth and sixth bullet points).

- 2.20 In the light of the options consultation results, the Preferred Option sought to promote further development in Staines and maintain the role of the other centres. This approach is maintained in the submission DPD.

3. Response to Inspector's Questions

(i) Is the strategy the most appropriate in all the circumstances and is it based on a robust and credible evidence base?

- 3.1 The Council has undertaken detailed studies in line with the guidance in PPS6 and obtained thorough and experienced commercial advice in understanding the current retail position and future needs. Its 2007 update has ensured the very latest information was available prior to agreement by the Council of the submitted DPD.
- 3.2 The strategy of focusing growth in non-food retail floorspace in Staines, of maintaining the other centres and not making further provision for food floorspace or other special stores such as DIY stores, is soundly based on the evidence base and advice received. It also reflects the general public concerns.

(ii) Does the strategy suitably address the needs of the town centres, particularly with regard to regeneration?

- 3.3 The Council does not regard any of the centres in Spelthorne to be in a degenerated state either as a result of economic decline or environmental conditions. It does recognise the need to foster a continuing process of renewal and adaptation to meet needs. Ashford, Shepperton and Sunbury have had to adapt in recent decades to reflect the changing nature of retailing and growth in demand for other services in local centres. The policies on retailing focus on enabling non A1 uses to also develop to provide a broad base of town centre facilities. Its fostering of new retail development in Staines, both in the past and in the future, reflects the need for a growth in retail floorspace to match growth of expenditure in the catchment area as well as meeting the needs of retailers for larger shop units, improved environment, and other support facilities such as parking to meet customer and retailer expectations. Studies have identified that Staines is where additional non-food floorspace should be provided. For this reason Staines has seen, and will continue to see, a continued process of change in the "retail offer" in the town and the context within which it is set. This is reflected in Policy SP4.
- 3.4 Specifically in Staines, meeting retailing needs involves both provision of new space (Policy TC1 (a)), refurbishment of existing space (Phase 1 and 2 of the Elmsleigh Centre upgrade completed in 2007) and addressing issues such as traffic, parking and the environment (covered in TC1 (b) to (d)). Policy TC2 provides the mechanism to manage the retail and other uses within the shopping area.
- 3.5 Within Ashford, Shepperton and Sunbury, Policy TC3 provides a positive framework to foster their role as employment locations as well as manage the existing retail floorspace to meet needs. Commitment is given to

management of the centres and looking for opportunities for further improvements to the environment. The Council has just started a three year programme of investment and improvement of these three centres which follows from its policy commitment.

- 3.6 It is considered the Council's approach suitably addresses the needs of the four town centres.

(iii) Is para 8.8 consistent with Policy SP4 in its approach to centres other than Staines town centre?

- 3.7 Para 8.8 describes the findings of the 2004 retail study and the 2007 update. It explains the need for a growth in non-food retail floorspace in Staines over the plan period but that there is no identified need to extend retail provision in the other three main centres in the Borough. The background to this is further explained in paras 2.1 – 2.20 above.

- 3.8 The approach in Policy SP4 to Staines is to identify the need for continued improvement and a growth in retail floorspace. For the other three centres their retail role is to be maintained, further growth in floorspace is not proposed but improvements are sought (see also para 8.5). The improvements envisaged are qualitative improvements to the existing floorspace to meet needs (see reference in para 2.13 (d) to the retail study) and environmental improvements (see para 3.5 above to reference to a current programme of work). Para 8.8 and Policy SP4 are consistent but the word 'improvement' in relation to Ashford, Shepperton and Sunbury Cross could benefit from brief clarification. A sentence could be added to the end of para 8.5 along the following lines:

“Appropriate improvements would be by way of improving the quality of existing floorspace by supporting refurbishment and extensions and through environmental enhancements to the centres”.

(iv) Does the strategy deal appropriately with traffic congestion in Staines town centre?

- 3.9 Like most towns in the region, Staines town centre experiences some congestion at peak times.
- 3.10 The Transport Statement (CD/SBC/022) has considered this issue and the ability of the centre to take further development. It notes at para 5.31 that increased retail development will not impact on peak hour traffic movements. Paras 3.41 to 3.49 assess the Elmsleigh Centre proposal and identify only a limited net increase of traffic at peak times and this does not include the beneficial impact of non-car based travel policies in the DPD (Appendix E, para 4.4 of the Transport Statement).
- 3.11 Paras 5.27 to 5.28 note Staines as the only location at which employment growth is expected. Whilst no specific sites have been identified it is noted that alternative transport and car restraint based policies, as set out in the DPD, will need to be applied. A specific action is, however, proposed in Policy TC1 (b) to continue to encourage means to improve traffic management, improve accessibility by public transport and other non-car based modes and require improvements through major developments.

- 3.12 In the above way the strategy has considered the issues of traffic congestion and set out an appropriate restraint or alternative travel approach which enables further development to be accommodated. This approach also recognises the role of the County Council and its Local Transport Plan (CD/SCC/201) in implementing measures, including the management of traffic.
- 3.13 The County Council's Local Transport Plan has no specific capital projects or proposals for Staines Town Centre over and above the alternative transport policies referred to above. The Airtrack scheme has potential benefits in North West Surrey generally, although the potential benefits for Staines are as yet unclear. The County Council has recently made a bid to SEERA for funding via the Regional Transport Board for transport improvements in the town centre.
- 3.14 The Borough Council is already proposing improvements to the bus station as part of Phase 3 of the Elmsleigh Centre extension. This is intended to assist public transport use.
- 3.15 The Council has also recently taken a lead in progressing a new Transportation Study of the town in line with Policy TC1 (b) but that work is still at an early stage. The purpose of the study is to identify how traffic may be managed more effectively, how alternative transport can be encouraged and specific improvements which future developments could contribute to.
- 3.16 Policy TC1 (b) sets out a clear strategy to address movement issues which, in part, are beyond the scope of this DPD to fully deliver but will need to be pursued as well through future revisions of the Local Transport Plan. This reflects an appropriate spatial planning approach.
- 3.17 The approach of Policy TC1 (b) is considered both appropriate and sound in the circumstances.

(v) Should Policy TC5 allow greater provision to be made for long stay parking?

- 3.18 The Council recognises that parking provision for shoppers is important in supporting the town's retail role and its relative attractiveness.
- 3.19 Long stay parking is generally needed for those who work in the town or are commuting elsewhere. This type of regular parking provides the greatest opportunity for modal shift. Encouraging such a shift through parking policy is in line with national, regional and County policy.
- 3.20 To allow greater provision for long stay parking would undermine efforts to reduce congestion and the wider environmental benefits of reducing car use. The policy is nevertheless seeking to strike a balance in provision and is not suggesting long stay parking should be removed.

(vi) Is Policy TC2 consistent with national policy? Is it sufficiently flexible?

- 3.21 PPS 6 (paras 2.16-2.17) covers, amongst other matters, the need to define the extent of primary shopping areas. It states that primary frontages should contain a high proportion of retail uses while secondary frontages should

provide greater opportunities for flexibility and a diversity of uses. Where such areas are defined, policies should make clear which uses will be permitted where.

3.22 'Report on Non-Retail Uses in Shopping Areas' – April 2007 (CD/SBC/18), provides background information to the formulation of Policy TC2 and the boundaries are shown on the Proposals Map. The policy seeks to maintain the primary shopping area of the town centre with a high proportion of retail uses. The current proportion is 83% and is shown in Table 1 of the background document. The second part of the policy deals with the proportion of A1 uses in secondary areas. Criteria are used to enable people to assess whether or not a specific proposal will be acceptable. The policy allows up to 5 out of 9 units to be in non-retail use and this is judged to provide appropriate flexibility for such uses recognising the primary retail role of shopping centres generally.

(vii) Is it appropriate for Policy TC3 to seek to retain existing levels of employment floorspace in Ashford, Shepperton and Sunbury Cross centres?

3.23 The three centres are accessible locations with significant employment including the provision of local services. Policy SP3 sets out the strategy to maintain the employment capacity of the Borough and well sited larger employment areas are identified and protected by Policy EM1.

3.24 Policy TC3 provides advice on two issues:

- a. how a mix of uses may be encouraged whilst maintaining the existing amount of employment floorspace.
- b. guidance on 'non-retail' uses in the defined shopping area.

3.25 In view of the strategy to maintain employment floorspace it is appropriate to explain how that must be achieved within the centres.

(viii) Does Policy TC5 add anything to National Policy? Should it permit expansion and modernisation of existing out-of-town facilities?

3.26 The approach of the Core Strategy is to focus significant new retail development on existing centres and the policy complements the strategy by setting out the approach to proposals in other locations. It is consistent with Government guidance in incorporating a sequential approach, but adds a local dimension by including reference to the hierarchy of town centres in Spelthorne with preference given to Staines.

3.27 The expansion of existing out-of-town facilities should not be excluded from the approach outlined in the Policy as suggested by some parties. Expansion of an existing store can create just as much extra out of centre retail floorspace as a new store and may change the character of an existing store in terms of the range of goods sold. Expansion proposals, therefore, need to be considered in the same way as new stores to examine whether the additional provision could be made in a sequentially preferable location.

PPS 6 (CD/NAT/406) is clear that the sequential approach to proposals for out

of centre development should apply to extensions and redevelopment (para 3.1). A policy that excluded extensions from the overall approach would, therefore, be inconsistent with national policy and the Council can see no local circumstances that could justify adopting a different approach to extending out of centre stores in Spelthorne than applies nationally.