

ECONOMY/EMPLOYMENT/RETAIL - Policies CP8, CP9 and WT3**Session/Issue 2:****vi) Is the presumption of “town centres first” consistent with national policy in the NPPF and/or justified by clear and robust evidence and appropriate in the local context?**

1. Whilst the town centres first approach is consistent with the requirements of the NPPF, the NPPF also calls for the allocation of appropriate edge of centre sites for town centre uses where suitable and viable town centre sites are not available. It also requires policies to be set for the consideration of main town centre uses that cannot be accommodated in or adjacent to town centres.
2. In addition, the NPPF requires the need for retail floorspace to be met in full and this need should not be compromised by limited site availability.
3. The NPPF requires LPAs, in drawing up local plans, to promote competitive town centres that provide customer choice and a diverse retail offer.
4. The Winchester Retail Study (2012 update) found fourteen potential development opportunities within and around Winchester town centre of which nine sites have reasonable to good potential to deliver additional retail/leisure floorspace. Four of these sites fall outside the town centre boundary and could be considered as edge or out-of-centre sites.
5. The retail study found that short to medium term opportunities within Winchester town centre are in theory capable of accommodating 16,000 sq m gross of class A1-A5 floorspace and can therefore meet all of the Winchester urban area projection up to 2021. It continues by explaining that if insufficient opportunities can be brought forward within the town centre, then it may be necessary to consider sites just outside the town centre boundary.
6. On this theme and in the interest of positive planning, the JCS should go beyond simply stating the need for impact assessments for large retail development outside the town centre boundary by acknowledging the ability of edge-of-centre sites to provide retail floorspace that either cannot be accommodated within the town centre or is of a sales format that is unviable in a town centre location. This will prevent the need for floorspace being compromised by limited site availability.
7. Whilst the JCS does not allocate land to deliver the necessary retail development, which is understood to be the role of forthcoming DPDs, the Local Plan should set out the amount of retail floorspace anticipated for the three spatial policy areas of the District .
8. Whilst the Retail Study cautions that the long term forecasts from to 2026 to 2031 are susceptible to change, it is predicted that there is future district-wide capacity for 1,125 sq m (net) of convenience floorspace and 10,786 sq m (net) of comparison floorspace. Given that the JCS intends to set out the strategic planning framework up to 2031, it should take a more positive approach to planning this capacity for additional retail floorspace to ensure that future need is fully met.