

3. Draft PPS6 : Key Policy Objectives

The Government's Aims

3.1 Draft PPS6 states that the Government's key objective is to promote vital and viable town centres. It seeks to encourage positive planning for the growth of existing centres, including their promotion and enhancement by focusing development in such centres, and encouraging a wide range of services. In this context, the Government's main objectives are to:

- enhance consumer choice and promote social inclusion by making provision for a range of shopping, leisure and local services, to meet the needs of the whole community;
- support an efficient, competitive, innovative and more productive retail and leisure sector;
- improve accessibility, ensuring that existing or new developments are highly accessible, and well served by a choice of means of transport;
- regenerate deprived areas, creating employment opportunities and an improved physical environment;
- promote economic growth of regional, sub-regional and local economies;
- deliver more sustainable patterns of development, seeking opportunities for high density, mixed use development, and promoting sustainable transport choices, reducing the need to travel and providing alternatives to the car; and
- promote good design, improving the quality of public open spaces, protecting and enhancing the architecture and heritage of centres, and creating an attractive and safe environment for businesses, shoppers and residents.

A Plan-Led Approach

3.2 Delivery of the Government's objectives will generate additional responsibilities for local planning authorities (LPAs), in the following key areas:

- i) Active management and planning for the growth of existing centres (and where appropriate, the decline of centres);
- ii) Defining a network of centres with a more even distribution of functions, and a hierarchy of centres each performing their appropriate role to meet the needs of their catchments (based on city, town, district and local centre definitions);
- iii) Adopting a pro-active, plan-led approach to planning town centres, through regional, sub-regional and local planning;
- iv) Developing town centre strategies to address the transport, land assembly, crime prevention, planning and design issues associated with the growth and management of their centres.
- v) Consultation with the community, including the public and private sectors, to ensure that their needs are reflected and that proposed allocations are realistic and viable.
- vi) Annual monitoring and review of the town and smaller centre allocations, policies and strategies, including health checks of the performance of existing centres.

Managing Growth in Existing Centres

3.3 In planning for growth in retail, leisure, office and other town centre uses, local planning authorities are encouraged to select the appropriate centres in which to accommodate the identified need for these uses over the plan period. Local planning authorities should identify sites within and adjoining existing centres for development or redevelopment (or identify buildings for change of use).

3.4 The efficient use of land and buildings within the town centre or in the most accessible locations should be promoted, by increasing the density of development through such

schemes as multi-storey, mixed use development. A diversity of complementary uses should be encouraged in the existing centres, for both day and evening activity, making town centres more attractive to local residents, shoppers and visitors. This has already occurred to some extent in Egham town centre, which now has a lively evening economy.

- 3.5 If centres are in decline, local planning authorities are encouraged to assess the scope for consolidating and strengthening the centre by focusing a wider range of services there. Alternatively they can reclassify them as lower-order centres within the local hierarchy, allowing retail units to change to other uses, whilst retaining essential local services such as post offices, banks and pharmacies. Other centres may require regeneration, such as Addlestone, where the identification of sites for redevelopment has already led to significant inward investment in terms of a major foodstore and office development.

Networks and Hierarchies of Centres

- 3.6 At both regional and local levels, planning authorities should plan the distribution of growth, rebalancing the network of centres to avoid over-concentration in regional and sub-regional centres, strengthen the lower-tier centres, and promote others to function at a higher level in the hierarchy. In promoting and enhancing existing centres, local planning authorities are encouraged to assess their roles, range of facilities and degree of specialisation, and hence their place in the overall hierarchy of centres.
- 3.7 Changes at the upper levels of the hierarchy should be addressed initially at the regional and sub-regional levels. Changes to the role of smaller centres, and the implications of upper level changes, should be brought forward through the local development framework process.

Role of Regional Plans

- 3.8 Regional Spatial Strategies (RSS) are to set out a vision and strategy for a region's growth, including the main centres in the region, and provide for planning at the local level. Responsibility is placed on regional planning bodies to develop a strategy for a balanced network of centres, making clear strategic choices about where major growth should be encouraged, which centres should have more limited growth, and where others in decline should be consolidated.
- 3.9 In addition, regional planning bodies are to assess the overall need for additional floorspace over the plan period for town centre uses, especially retail, leisure and office uses, for 5-year periods within the RSS. An assessment of the capacity of existing centres to accommodate additional development is also expected to be provided.

Comment

The scope and complexity of the assessments required at the regional level, particularly the overall need for retail floorspace, may not be realistic given the strict timetable for the production of Regional Spatial Strategies. The onus is likely to fall upon local planning authorities to provide the necessary information, which would require the front-loading of the collection of the evidence base, such as local needs assessments, at the beginning of the LDF programme. This may place undue pressure on already stretched local planning resources, unless funding is made generally available for external assistance. Local authorities do not have resources to support regions in the assessment work.

Role of Local Plans / Local Development Frameworks (LDF)

- 3.10 The draft statement encourages local planning authorities to adopt a positive and proactive approach to planning for the future of the centres within their areas, whether planning for growth, consolidation or decline. They should set out a vision and strategy for the pattern, hierarchy and role of centres, including local centres, drawing on both the RSS and community strategy.
- 3.11 Working in conjunction with business and other interested parties, local planning authorities are expected to:
- Assess the need for new floorspace for retail, leisure and other key town centre uses, taking account of both quantitative and qualitative factors;

- Identify deficiencies or gaps in provision, assess the capacity of existing centres to accommodate new development, including the scope for extending the town centre, and identify centres which may need consolidation or managed decline;
- Identify the city, town, district and local centres within their area where development will be focused, and prepare strategies for developing and strengthening centres within their area;
- Identify and allocate sites for town centre uses, especially retail, leisure and offices;
- Review all existing allocations as part of the same exercise;
- Develop local strategies for ensuring equality of access to local facilities; and
- Set out criteria, in accordance with the key policies proposed in the draft PPS, for assessing and locating other new development proposals for sites not allocated in the plan.

3.12 The draft PPS highlights the need for strategies for town and smaller centres, drawing together a wide range of issues involved in the planning, design and management of centres. Such strategies will form an important part of the preparation of the Local Development Framework, in terms of reviewing local planning policies, and providing part of the evidence base for Development Plan Documents, or the basis for Area Action Plans.

Comment

The preparation of town and smaller centre strategies in Runnymede has become a clear priority as expressed within the Community Strategy. The need for such strategies has been identified within the second draft Local Development Scheme (also reported within this Committee Agenda), to be prepared in the period following the completion of the primary Local Development Documents, which will include the core strategy, statement of community involvement, development control policies, housing policies and allocations, car parking strategy and proposals map. The development of individual town and smaller centre strategies can take place within the current LDF programme, if the collection of the evidence base to support the strategies can be undertaken now, to be incorporated into the core strategy of the LDF.

3.13 Site selection and land assembly: The proposed tools for the identification and allocation of sites for appropriate town centre uses, will involve the following considerations:-

- a) *Assessing the need for development*
- b) *Securing the appropriate scale of development*
- c) *Applying the sequential approach to site selection*
- d) *Assessing the impact of proposed development on existing centres*
- e) *Ensuring locations are accessible*
- f) *Specific local circumstances such as physical regeneration, employment, economic growth, and social inclusion*

NB These are explored in greater detail and commented upon in Annex 1, together with information and comments relating to site assembly, managing growth in smaller centres, implications for development control and monitoring and review.

4. **Council Policy**

4.1 It can be demonstrated that Council policy is already in line with the key objectives of the draft PPS6, as can be identified in the Community Strategy, and the Leader's Position Statement which indicates that the Council proposes (via its Economic Development Committee) "to continue to improve the general environment of our three main town centres whilst encouraging and maintaining local and village economic vitality and will develop some specific goals and timetables for the emerging proposals, whilst also encouraging and maintaining local and village economic vitality."

4.2 Significant physical enhancements have already taken place in Egham and Chertsey town centres in recent years, together with the commitment to complete the final phase of

Chertsey Revitalisation, and Addlestone is soon to benefit from traffic safety improvements, and the release of sites for significant redevelopment opportunities.

- 4.3 The Council also seeks "to maintain and improve the current economic prosperity of Runnymede by working closely with business and those wishing to locate or expand in the Borough". This relates well with the draft PPS6 proposals to encourage local authorities, retailers and developers to be sensitive to each other's objectives and work together to reach flexible solutions.
- 4.4 In terms of conformity with existing Local Plan policy, the most significant departure relates to the proposals for local need assessments and the identification of additional floorspace for retail, leisure and office developments. Also, smaller centres have not been the subject of specific strategies for planned growth in the current Local Plan, a particular deficiency which can be introduced via the LDF process.

5. Resource Implications

- 5.1 The tools for the implementation of the various elements of the draft PPS, in terms of developing town and local centre strategies, carrying out local needs assessments, enhancing the environment and access to town centres, engaging community involvement, and carrying out annual monitoring, reviews and health checks, would benefit from a comprehensive Borough-wide existing centre study. Assistance provided by engaging a consultant may be an appropriate way forward if the Committee consider this to be a priority within the current programme.
- 5.2 Resources may be identified within existing budgets reserved for the Local Development Framework, while additional funding may be available from Central Government as part of the Planning Delivery Grant. This source of funding can be considered in liaison with the Government Office for the South East.

6. Other Issues

- 6.1 Proposals in draft PPS6 rely on inclusive consultation with key stakeholders including the local community, shoppers, retailers, and developers particularly in the development of town and smaller centre strategies. The Borough's Consultation Strategy provides a commitment to carrying out effective consultation with the Council's stakeholders, selecting the most appropriate mechanism from focus groups and public exhibitions, to public meetings and planning for real exercises. Numerous avenues of communication are available to provide access to the Council's external and internal audiences as detailed in Runnymede's Communications Strategy such as the Residents' Panel and the Council's website. Both the Consultation and the Communications Strategies provide a commitment to seeking ways to access hard-to-reach groups which is an important element within draft PPS6 and for the preparation of the LDF.
- 6.2 Unfortunately there seem very few references to the Disability Discrimination Act throughout draft PPS6. This is a significant omission given that disabled access considerations are essential in creating an accessible and inclusive town centre environment with ease of access to buildings, services and facilities. This will be particularly relevant from 1st October 2004 when service providers will need to make reasonable adjustments to the physical features of their premises and buildings to overcome physical barriers to access.

DRAFT PLANNING POLICY STATEMENT (PPS) 6 : PLANNING FOR TOWN CENTRES**1.0 Role of Local Plans / Local Development Frameworks (LDF)****1.1 Site selection and land assembly**

1.2 The proposed tools for the identification and allocation of sites for appropriate town centre uses, will involve the considerations outlined below:

- a) *Assessing the need for development:* Local need assessments should be carried out as part of the LDF process, and updated regularly, at least every five years. They should take account of the hierarchy of centres identified by the RSS, and the catchment areas of each centre. They should consider the quantitative and qualitative factors in assessing the need for additional retail and leisure development, while the need for office floorspace should be considered as part of an authority's assessment of overall need for land and floorspace for employment.
- b) *Securing the appropriate scale of development:* The scale of new facilities should be directly related to the role and function of the centre and the catchment they seek to serve. For instance, local centres will generally be inappropriate locations for large scale new development, and local planning authorities should consider setting an upper floorspace limit for the scale of developments in such centres, directing developments above these limits to district and town centres.
- c) *Applying the sequential approach to site selection:* Local planning authorities are encouraged to consult with the development industry in planning for growth, and be realistic and flexible in identifying sites and accommodation appropriate for the identified need. Central or highly accessible locations within existing centres should be given priority, followed by edge-of-centre locations, and then out-of-centre locations.
- d) *Assessing the impact of proposed development on existing centres:* In selecting sites for allocation in local plans / LDFs, local planning authorities should have regard to the objective of promoting vital and viable town centres, and make an explicit assessment of the likely impact of the proposed development on such centres.
- e) *Ensuring locations are accessible:* Local planning authorities should be mindful of the Government's objective to reduce the need to travel, to reduce reliance on the car, to facilitate multi-purpose journeys, and ensure everyone has access to a range of facilities. Therefore in selecting sites for allocation, full regard should be made to the need for accessibility by a choice of means of transport, and the impact on car use, traffic and congestion.
- f) *Specific local circumstances:* Factors such as physical regeneration, employment, economic growth, and social inclusion may also be material considerations in selecting sites for allocation.

1.3 Assembling sites

A 5-year supply of sites should be allocated to meet anticipated demand for town centre uses over that period. In appropriate centres, local planning authorities are encouraged to consider using compulsory purchase (CPO) powers to ensure that suitable sites within or on the edge of centres are brought forward for development.

Comments

In contrast to the collection of an evidence base for town and smaller centre strategies, the local need assessments required for site selection and land assembly, may go beyond the realistic resources and expertise available within local planning authorities. It is unlikely that they could be achieved within the current RSS and LDF timetables, unless external assistance is engaged. This may be covered by funds available under the Planning Delivery Grant, and it is suggested that the Government factors these costs into their next allocation to local planning authorities.

Allocating a 5-year supply of sites, and assessing the need for additional floorspace for retail, leisure and office developments in specific centres, appears unrealistic given the fluctuations and constantly evolving nature of the market. This will be particularly difficult to quantify in smaller towns and suburban centres such as those in Runnymede, where growth may be dependent upon a fairly limited number of available sites, and where flexibility would need to be employed in order to secure appropriate development. It may also become a source of conflict with developers who will expect local planning authorities to be flexible in terms of identifying uses for particular sites.

However, it is acknowledged that without some form of regulation, problems can arise with a proliferation of similar uses in particular centres, for instance, the growth of office development in Chertsey over recent years, some of which still remains vacant. A local assessment demonstrating the need for the re-balancing of town centre uses may be more appropriate, indicating the consolidation of some uses, and the promotion of others.

There seems to be a lack of reference throughout the draft PPS to the importance of attracting residential development in town centres, which is also essential for the vitality and viability of existing centres.

1.4 Managing growth in smaller centres

- 1.5 Local planning authorities should strengthen local centres by ensuring that there is a range of facilities in local centres, consistent with the scale and function of the centre, to meet people's day to day needs and to promote social inclusion. Local strategies should be prepared to assess where deficiencies exist in the provision of local shopping and other facilities, and involve the local community and retailers in the strategy to ensure that planned new facilities genuinely meet local needs. Government guidance on 'Strategies for Smaller Centres' to accompany PPS6, is to be published in due course.

Comment

There is limited scope for local planning authorities to influence the type of uses needed in a particular centre purely through the planning process, apart from adopting a flexible approach to changes of use. Specific deficiencies identified in the provision of local shopping and other facilities in an existing centre, may be addressed through effective centre management, or through liaison with established organisations such as the Chambers of Commerce, or the Runnymede Business Partnership.

2.0 Implications for Development Control

- 2.1 The policies in the draft PPS are to be applied to all proposals for new development, redevelopment, extensions, changes of use involving development, renewals, and applications to remove or vary planning conditions, such as the addition of mezzanine floors, or changing the range of goods sold. The key considerations for identifying

sites for allocation as set out in the previous section, apply equally to the assessment of planning applications.

2.2 Local planning authorities should require applicants to demonstrate that:

- *There is a need for the development* - particularly if a retail or leisure development is proposed in an edge-of-centre or out-of-centre location, or contrary to the local plan/LDF. Local planning authorities are to take account of both the quantitative need for additional floorspace, and the qualitative need;
- *The development is of an appropriate scale*, assessed either in relation to the role and function of the existing centre, or in accordance with the LDF, which may set out the maximum floorspace which will be acceptable in particular centres for different facilities;
- *There are no more central sites for the development* – developers must also apply the sequential test to the selection of sites (except in the case of extensions to existing development);
- *There are no unacceptable impacts on existing centres* - assessments should be carried out where edge-of-centre development or significant town centre development is proposed, which could impact upon other centres;
- *Locations are accessible* by a choice of means of transport, assessing the likely impact of the development on car use, local traffic levels and congestion in the town centre.

2.3 The draft PPS indicates that proposals located within existing centres are not required to demonstrate need or satisfy the sequential approach, although the scale and nature of the development in relation to the role of the centre should be considered. Extensions to existing out-of-centre retail stores are also exempt from the sequential approach. The draft PPS indicates that in considering whether sites are suitable, viable and available, local planning authorities should take into account any genuine difficulties in operating the applicant's business model from the sequentially preferable site. However it will not be sufficient for an applicant to claim that the class of goods it proposes to sell can not be sold from the town centre.

2.4 Debate has recently been focussed on the need to control the development of additional floorspace in retail developments with the ad hoc introduction of mezzanine floors. The draft PPS indicates that a planning condition should be introduced to limit any internal alterations to increase the amount of retail floorspace, including the addition of mezzanine floors.

3.0 Monitoring and Review

3.1 Annual Monitoring Reports

3.2 The following matters will be required to be kept under regular monitoring and review by local planning authorities, in order to ensure the on-going effective management and planning of town centres:

- the network and hierarchy of centres (at both regional and local levels);
- the need for further development;
- the outcome of the strategies for local shopping and services; and
- the vitality and viability of centres.

3.3 Health Checks

3.4 These are recommended by the draft PPS6 in order to inform the review of allocations and policies in the network and hierarchy of centres. Information should

be gathered on a wide range of issues, including: the quality, quantity and convenience of retailing and other uses in the area, and the potential for growth or change of centres; population change; economic growth or decline; expenditure patterns; diversity of uses; retailer representation; shopping rents; proportion of vacant street level property; commercial yields; pedestrian flows; accessibility; customer views and behaviour; perception of safety and occurrence of crime; and the environmental quality of the town centre.

Comment

Comprehensive monitoring of commercial uses and vacancies in the Borough is already carried out by the Council, including property and land acquisition, and the analysis of rental values, etc. Health Checks would provide a thorough overall assessment of existing centres, which would provide a valuable resource for the evidence base of the Local Development Framework. Such assessments may go beyond the scope of current local planning authority resources, and could only be achieved with external assistance.