
Town Centres and Retail Issues Report - Final Report

Introduction

- 1 The *Town Centres and Retailing Issues Report* was published by the Joint Committee on 1st October 2007, with comments invited by 17th December 2007. The Joint Committee distributed seventy copies to a list of stakeholders agreed by the Retail Topic Group. The Report was also made available for download via the Joint Committee's website. The Structure Plan Manager received twenty-seven responses (39%) to the consultation, from a variety of stakeholders. These responses were summarised in a report to the March 2008 meeting of the Joint Committee.
- 2 The purpose of the *Issues Report* was to enable the constituent authorities of the Joint Committee to consider the key issues relating to the policy context for the development of Town Centres and retailing in the Glasgow and the Clyde Valley area as part of the Joint Committee's early preparatory steps towards the inaugural Strategic Development Plan (SDP) in 2011.
- 3 A range of diverse views were received from the responses to the *Issues Report*, however a number of key points emerged, namely,
 - a preference for a network based model of Town Centres, rather than a hierarchical based model;
 - a strategic scale should mean higher floorspace thresholds;
 - qualitative assessments deemed more relevant than quantitative assessments;
 - household surveys remain a valuable asset.
- 4 One of the key issues for the SDP is whether the Joint Committee needs to focus more on those key Town Centres which have a genuine strategic role with Local Development Plans addressing the needs of other Town Centres. Based upon the responses received, this issue seems unresolved with views expressed in both camps. This issue is central to the policy approach to be adopted by the Joint Committee for the SDP and will therefore require further examination and debate.
- 5 The questions raised in the *Issues Report* are set out within this report along with a potential response from the Joint Committee following consideration by the Retail Topic Group, the Steering Group and following stakeholder comments at the Retail Focus Group meeting held on 13th May 2008.
- 6 The recommended responses outlined in the Appendix have been developed in order to enable further engagement with stakeholders ahead of the publication of the Draft Regulations on the content of SDPs in early 2009 and also the long-awaited Planning Advice Note (PAN) on *Town Centres and Retailing Methodologies* in summer 2008. The contents of these publications may significantly change the current context in which these responses were drafted and the current lack of clear direction in terms of the SDP and PAN has been by necessity reflected in some of the responses to the Issues Report.

Recommendation

- 7 It is recommended that the Joint Committee
- notes the contents of this Report;
 - agrees the recommended responses to the issues raised as set out in the Appendix;
 - use the responses as a means of further engagement with stakeholders.

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Structure Plan Manager

Appendix

Issues Report Questions and Recommended Response

Network of Centres (Issues 1 - 6)

Issue 1 - Strategic Centres

Is the current strategic policy to support and protect each of the Town Centres identified in Schedule 1(a) of the 2006 Alteration still appropriate?

Should any of these no longer to be protected at the strategic level, in keeping with the context of the aim for a Strategic Development Plan and left to Local Plans to identify their purpose?

Recommended Response

The Joint Committee recognises the need to consider whether a focus only on Town Centres which are strategically significant, is the most relevant strategic approach. The Joint Committee considers such an approach would be in line with the Scottish Government's requirements for SDPs to concentrate on an overview of genuinely strategic issues which cross council boundaries and for the documents to be brief, clear and more focused than structure plans. The basis for determining which centres are to be designated as higher order for strategic planning purposes and those to be considered under Local Development Plans should be based on criteria that are transparent and rational and will require further detailed discussion by the Topic Group and with all stakeholders.

Issue 2 - Additions to Strategic Centres

Should there be any additions to the list of Town Centres and if so, based on what evidence?

Recommended Response

The Joint Committee will undertake further data collection to substantiate the list of centres included in the first SDP. There is a possibility that additional centres might be added but these additions would have to be within a context of genuinely strategic issues with cross-boundary impacts.

Issue 3- Out-of-Centre Locations

Are there any changes required to the list of out-of-centre locations and if so, why?

Recommended Response

The Joint Committee will give consideration to only including those Commercial Centres within the network of centres which could be demonstrated as being of genuine strategic importance within the context of the whole Glasgow and Clyde Valley area be considered for inclusion.

Issue 4 - Network of Centres

Should the Strategic Development Plan continue the current policy emphasis on Town Centres as the focus for the development of retail floorspace whilst recognising a network of Commercial Centres?

Recommended Response

The Joint Committee will give consideration to the first Glasgow and the Clyde Valley SDP recognising a network of centres as identified by SPP8: *Town Centres and Retailing*. However, it is recognised that both the hierarchical approach and network approaches are not mutually exclusive and that a spatial hierarchy based upon different scales of centres can exist within the network. The requirement of SPP8 that the status of commercial centres be recognised and clarified will require the methodology for retail capacity assessment to be adapted to assess more fully the interrelationships within the network of centres.

Issue 5 - Commercial Centres

SPP8 identifies a two-tier hierarchy of Town Centres and Commercial Centres. Should the Strategic Development Plan identify solely strategically important Commercial Centres, all Commercial Centres or should these centres be identified by Local Plans?

Recommended Response

The Joint Committee will give consideration to incorporating only those Commercial Centres within the network of centres which could be demonstrated as of genuine strategic importance within the context of the whole Glasgow and Clyde Valley area for inclusion in the SDP.

Issue 6 - Retail Centres

Should the Strategic Development Plan recognise the change in consumer behaviour and separate certain Town Centres role of providing and protecting retail floorspace from their role of continuing to focus other forms of development within Town Centres to retain them as the economic, social and environmental core of the local community?

Recommended Response

Following the collection of the appropriate data as evidence-base, the Joint Committee will assess whether the number of centres identified in the first SDP as strategically significant centres for town centre and retailing functions requires to be amended. Any centres identified on the current policy schedules of the 2006 Structure Plan that are removed as part of this process will remain protected via policies set out in Local Development Plans.

Strategic Policy (Issues 7 - 11)

Issue 7 - Convenience and Comparison Floorspace

Should convenience and comparison floorspace requirements continue to be subject to the same policy mechanisms within the first Glasgow and the Clyde Valley Strategic Development Plan?

Recommended Response

The Joint Committee is currently awaiting further clarification from the Scottish Government on the content of SDPs. The Scottish Government's previous statements on SDPs concentrating on genuinely strategic issues that cross council boundaries may appear to suggest that convenience retailing would not be an issue for consideration in an SDP, as although there are cross-boundary issues for food retailing this could be a function of local authority boundaries and not a genuinely strategic planning issue. Comparison retailing remains a genuinely cross-boundary strategic issue and will require to be addressed in the context of the new SDP. However, a strategic focus solely on comparison shopping might represent a limited and fragmented perspective on retailing within an SDP and the Joint Committee recognises that further discussion on this key issue will be required.

Issue 8 - Assessment

Which of the criteria (a) to (k) in Schedule 6(c)(i) Assessment of Significant Retail Development Proposals remain relevant to a Strategic Development Plan?

Recommended Response

The Scottish Government have previously advised stakeholders that SDPs will have a greater content of 'Vision' and 'Strategy'. The Joint Committee recognises that within the context of briefer, clearer and more concise SDPs that retail policy schedules may require to be substantially revised for the first GCVSDP and recommends further consultation with stakeholders in developing future strategic policy.

Issue 9 - Sequential Approach

Should the Sequential Approach be outlined in the Strategic Development Plan?

Recommended Response

The Joint Committee recognises the importance of the sequential approach and that it will inform the development of future strategic retail policy. However, within the context of briefer, clearer and more concise SDPs the Joint Committee recognises that there might be no requirement to repeat policy already articulated in SPP8 within the SDP unless there are substantial local circumstances identified for strategically important centres.

Issue 10 - Strategically Significant Development

Schedule 9 of the 2006 Alteration sets out the threshold for identifying the scale of development which is likely to be significant and require the case for development to be established in terms of the criteria outlined in Strategic Policy 9. The current scales of retail development are Comparison over 2,000m² and Convenience over 1,000m². Do you consider these thresholds are still appropriate and if not what should they be and why?

Recommended Response

The Joint Committee is currently awaiting further clarification from the Scottish Government on the content of SDPs. The Development Planning Regulations are due to be published, coming into force in late 2008/early 2009. The early indications are that SDPs will not have overly detailed development management type policies but instead thresholds would be within the context of identifying strategically important centres.

Currently the revised Circular 5/07 Notification of Planning Applications highlights two criteria for major retail development:

- (a) development for the purpose of retail shopping comprising an area of 10,000 square metres or more of gross retail floorspace.
- (b) development involving retail sales which is such that the goods or services for sale are likely to be purchased to a significant extent by persons resident within the area of a local authority other than that in which the proposed development is to be situated, where the local authority of the other area, having been consulted, has made representations to the effect that planning permission should not be granted.

Therefore, any thresholds to be set out in the SDP would have to be within context of these existing national requirements whilst recognising that the Joint Committee is able to establish thresholds of significance for strategic planning purposes. The Joint Committee will continue dialogue with all relevant stakeholders in the time proceeding publication of the new development planning regulations.

Issue 11 - Strategic Policies 9 and 10

Should Strategic Policies 9 and 10 be re-structured or replaced to enable a better reflection of local circumstances and qualitative issues as identified by SPP8? If so, how?

Recommended Response

The Joint Committee is currently awaiting further clarification from the Scottish Government on the content of SDPs. The Development Planning Regulations are due to be published and come in force in late 2008/early 2009. The early indications are that there will not be development management policies within the SDP more likely these will be issued as 'Supplementary Planning Guidance'. If such policies are included the Joint Committee will continue dialogue with all relevant stakeholders to consider what policies would be appropriate in support of the SDP's retail policy.

Priorities for Action (Issue 12)

Issue 12 - Town Centre Renewal Priorities

Do you consider that any of the centres identified in Schedule 1(a) have qualitative or quantitative deficiencies in terms of meeting the needs of their catchment population and if so why?

Should any of the centres listed in Schedule 1(a) be added/deleted from the existing town centre renewal priorities listed in Schedule 1(a)?

Recommended Response

The Joint Committee suggests further data collection to substantiate the formulation of the list of strategically important centres requiring renewal included in the first SDP.

Strategic Retail Capacity Assessment Methodology (Issues 13 - 22)

Issue 13 - Retail Capacity Assessment Methodology

Do you consider the current retail capacity assessment methodology used for the 2006 Alteration accurately reflects strategic patterns and trends associated with retailing in the currently identified network of centres?

If not what alternative methodology would you propose as being appropriate for strategic planning purposes?

Recommended Response

The Joint Committee recognises that in the context of a SDP that solely focusing/publishing on a retail capacity assessment is not an appropriate analytical framework for SDPs in particular in the context of Scottish Government statements contained in "Modernising the Planning System" and the recently published Scottish Government "Town Centres and Retailing Methodologies" research report.

However, within the context of a SDP, the Topic Group recommends that fully assessing the expenditure flows and catchment areas of all centres in the GCV area would be a critical component in identifying strategic centres, and this could only be done through a comprehensive assessment of all centres. Following a full capacity assessment it might be considered appropriate for the SDP to focus only on strategic centres or postulate another potential assessment framework. The Joint Committee will continue dialogue with all relevant stakeholders in the time proceeding publication of the new Planning Advice Note on *Retailing and Town Centre Methodologies*.

Issue 14 - Household Shopping Survey Timescale

The GCVSPJC proposes that Household Shopping Surveys should only be undertaken on a 5-yearly timescale with the next survey scheduled for 2008/09. Do you agree?

Recommended Response

The Joint Committee is currently undertaking discussions with relevant public sector stakeholders as to the format of this data collection and whether there continues to be a specific household shopping survey or a joint regional survey covering several areas of interest. The Joint Committee supports continued dialogue with all relevant stakeholders via the Retail Focus Group.

Issue 15 - Household Shopping Survey Questionnaire

Annex 1 identifies the questions used in the 2003 Household Shopping Survey, do all the questions remain appropriate?

Do you have any suggestions for changes to the list of questions?

Recommended Response

The Joint Committee is currently undertaking discussions with relevant public sector stakeholders as to the format of this data collection and whether there continues to be a specific household shopping survey or a joint regional surveys covering several areas of interest. The Joint Committee supports continued dialogue with all relevant stakeholders via the Retail Focus Group.

Issue 16 - Household Shopping Survey Methodology

Do you have any suggestions for possible locations for on-site surveys if this option is pursued by the Joint Committee?

Topic Group Recommended Response

The Joint Committee is currently undertaking discussions with relevant public sector stakeholders as to the format of this data collection and whether there continues to be a specific household shopping survey or a joint regional surveys covering several areas of interest. The Joint Committee supports continued dialogue with all relevant stakeholders via the Retail Focus Group. Within the context of a revised methodological framework, the Joint Committee will give consideration to on-site surveys at strategically important centres to inform the SDP and non-strategically important centres within the context of LDPs would be useful. However, there needs to be further detailed discussions regarding costing and how many surveys can be accommodated within the relevant centres.

Issue 17 - Retail Catchment Areas

Do you consider that the current shopping catchment areas, generated from the extensive 2003 Household Shopping Survey and the methodology used to derive them, generate an appropriate spatial geography for the analysis of expenditure to floorspace turnover?

If not what alternative methodology would you propose for the identification of shopping catchment areas?

Recommended Response

The Joint Committee supports that utilising a retail assessment methodology that covers the whole of the GCV area might not be appropriate in the currently articulated context of an SDP which seems to suggest concentrating on the catchment areas for strategically important centres for certain types of retailing. This and the possibility of the non-inclusion of food retailing within an SDP could have implications for the continued inclusion of retail catchment areas within the SDP. The Joint Committee supports continued dialogue with all relevant stakeholders on this issue in the formulation of SDP retail policy.

Issue 18 - Tourism Expenditure

Tourists are a significant contributor to expenditure in the Glasgow and the Clyde Valley area, should an estimate of this expenditure be incorporated in future retail capacity assessments?

If so, on what evidence base should it be constructed and how should the expenditure be distributed between the network of centres?

Recommended Response

The Joint Committee supports recognises the importance of tourism expenditure to both the regional and national economy but its specific inclusion within any future retail methodology will depend on the type and format of analytical framework used to underpin retail policies for the first SDP. The Joint Committee supports continued dialogue with all relevant stakeholders on this issue in the formulation of SDP retail policy.

Issue 19 - Data Sources

The 2006 Alteration uses an average of MapInfo 05/2 long and medium-term expenditure estimates for convenience and comparison shopping. Do you agree with the use of MapInfo data or do you consider other trends or sources of data more relevant?

The 2006 Alteration uses turnover to floorspace ratios for convenience and comparison operators obtained from Retail Rankings (2005 Edition). Do you agree with the use of this source of data?

The 2006 Alteration makes specific assumptions regarding expenditure via Special Forms of Trading. Which sources of data do you consider most appropriate for Special Forms of Trading?

TR7/06 uses outlet surveys undertaken by each local authority using the Assessors and Valuation Joint Boards records as a base to identify the location of the property, to identify occupied retail floorspace. Do you agree with this methodology?

Recommended Response

The Joint Committee is satisfied with the appropriateness and robustness of these data sources as the most efficient for a retail capacity assessment but in the light of requirements for an SDP they might not continue to be used in the same manner at a strategic level. Joint Committee supports continued dialogue with all relevant stakeholders on this issue in the formulation of SDP retail policy

Issue 20 - Vacant Floorspace

Do you consider that vacant floorspace should be included in future strategic retail assessments?

Recommended Response

The Joint Committee supports the consideration that vacant floorspace may not be an issue for SDPs, unless there are significant large-scale vacancies of specific retail floorspace developments, which given the current industry requirements appears unlikely.

Issue 21 - Strategic Retail Capacity Assessment Timescale

Should the next strategic retail capacity assessment have a longer term planning horizon than the 8 years employed for TR7/06 and if so how long should it be and should it differ between food and non-food sectors?

Recommended Response

The Joint Committee supports recognises that whatever type of retail assessment underpins the next SDP it will require to have a timescale of at least 5 years to dovetail with the requirement for five-yearly reviews of SDPs. Therefore, in practice it may be appropriate to have a timescale longer than 5 years to cover unforeseen circumstances surrounding the adoption and future mandatory examination of SDPs. The Joint Committee supports continued dialogue with all relevant stakeholders on this issue in the appropriate timeframe for the SDP retail assessment.

Issue 22 - Strategic Qualitative Assessment

Should the GCVSPJC and relevant partners investigate the possibility of undertaking a qualitative survey of the network of centres in the Glasgow and the Clyde Valley area to enable a strategic approach to be taken to quality issues?

How should quality be defined consistently to enable a strategic assessment?

Should any quality survey be focussed on specific centres?

How should any quality survey be funded?

Recommended Response

The Joint Committee recognises that the retail assessment methodology for the first SDP will require to have greater regard to qualitative factors. A more appropriate analytical framework for SDPs in the context of Scottish Government statements in “Modernising the Planning System” and recently published Scottish Government Town Centres and Retailing Methodologies research might be to employ retail assessment methodologies similar to those already undertaken in the other three city-regions of Scotland namely Aberdeen, Dundee and Edinburgh. The Joint Committee supports continued dialogued with all relevant stakeholders on this issue particularly with regard to the appropriate analytical framework for the SDP retail assessment, the centres it should cover and how any surveys should be funded. Detailed cost implications will require to be assessed prior to further discussions about possible qualitative assessments.

Monitoring (Issues 23 - 24)

Issue 23 - Monitoring Framework

If a Household Shopping Survey is only undertaken once every 5 years, a complete update of the Retail Capacity Assessment will only be possible every 5 years. Therefore, currently the GCVPSJC proposes to update the assessment every 5 years and closely monitor the following key indicators of the capacity assessment and reporting either annually or bi-ennially? Do you agree with this approach and the choice of indicators?

Recommended Response

Given the Joint Committee’s recognition of the requirement to change its current retail assessment methodology it will undertake further discussions with stakeholders on monitoring frameworks during and after the agreement of a new method for assessing retail requirements at a strategic level.

Issue 24 - Retail Focus Group

What do you think should be the frequency of meetings of the GCVSPJC Retail Focus Group to enable effective retailer representation?

Are there any other organisations or individuals who should be added to the membership of the Retail Focus Group to enable a more proactive approach to policy and monitoring development?

Recommended Response

The Joint Committee agrees with those respondents who suggested that meeting of the Retail Focus Group should not be fixed to a rigid timescale i.e. every 3 or 6 months, but instead that the frequency of the meetings should be tailored to the key stages of SDP production. The Joint Committee supports the inclusion of all the new members suggested during the consultation and these have been added to the relevant mailing lists.

Transport and Accessibility (Issues 25 - 27)

Issue 25 - Accessibility

How can the Plan ensure that retail accessibility is equal to all sections of society and reduce dependency upon car-based access?

Recommended Response

The Joint Committee recognises that the retail assessment methodology for the first SDP will require to have greater incorporation and publication of determining qualitative factors including accessibility. A more appropriate analytical framework for SDPs in the context of Scottish Government statements in “Modernising the Planning System” and recently published Scottish Government Town Centres and Retailing Methodologies research report might be to employ retail assessment methodologies similar to those already undertaken in the other three city-regions of Scotland, namely Aberdeen, Dundee and Edinburgh. The Joint Committee supports continued dialogue with all relevant stakeholders on this issue in terms of the appropriate analytical framework for the SDP network of centres/retail assessment. Specific discussions with the Regional Transport Partnership, Strathclyde Partnership for Transport, are currently ongoing into areas of joint interest e.g. accessibility, public transport and car parking.

Issue 26 - Public Transport

Which centres should be identified as priorities for the promotion or improvement of public transport services?

Recommended Response

The Joint Committee recognises that the retail assessment methodology for the first SDP will require having greater incorporation and publication of determining qualitative factors including public transport. A more appropriate analytical framework for SDPs in the context of Scottish Government statements in “Modernising the Planning System” and the recently published Scottish Government Town Centres and Retailing Methodologies research report might be to employ retail assessment methodologies similar to those already undertaken in the other three city-regions of Scotland: Aberdeen, Dundee and Edinburgh. The Joint Committee supports continued dialogue with all relevant stakeholders on this issue in terms of the appropriate analytical framework for the SDP network of centres/retail assessment. Specific discussions with the Regional Transport Partnership, Strathclyde Partnership for Transport, are currently ongoing into areas of joint interest e.g. accessibility, public transport and car parking.

Issue 27 - Car Parking

How can the Plan contribute to a balanced approach to car parking provision and policy?

Recommended Response

The Joint Committee recognises that the retail assessment methodology for the first GCV SDP will require having greater incorporation and publication of determining qualitative factors including car parking. A more appropriate analytical framework for SDPs in the context of Scottish Government statements in “Modernising the Planning System”, recently published Scottish Government Town Centres and Retailing Methodologies research report and presumed content of the forthcoming Planning Advice Note (PAN) on Retailing and Town Centre Methodologies, might be to employ retail assessment methodologies similar to those already undertaken in the other 3 city-regions of Scotland: Aberdeen, Dundee and Edinburgh. The Joint Committee supports continued dialogue with all relevant stakeholders on this issue in the appropriate analytical framework for the SDP network of centres/retail assessment. Specific discussions with the Regional Transport Partnership: Strathclyde Partnership for Transport are ongoing into areas of joint interest e.g. accessibility, public transport and car parking.