



Hart Local Plan: Strategy and Sites 2016 – 2032

**Council Response to
Inspector's Matters and Issues for
Examination**

**Matter 10
Retail and Town Centres**

25 October 2018

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10.1 Where has the identified need for additional comparison and convenience floor space set out in Policy SSI been derived from? Why do the figures not appear to correlate with the identified need identified in the Retail, Leisure and Town Centres Study 2015?

- 10.1.1 Paragraph 158 of the NPPF 2012 states that **“each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area”**. The Council considered that its Retail, Leisure and Town Centres Study 2015, Part 1 and 2 (Town Centres Study) provides adequate, up-to-date and relevant evidence on which to base its Local Plan retail policies.
- 10.1.2 Paragraph 160 of the NPPF 2012 states that this evidence base should be used to assess **“the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development”**. In response to paragraph 160, the Town Centres Study objectively assessed the quantitative and qualitative need for retail and other town uses for the period 2014 to 2032, based on a widely adopted and accepted methodology. This methodology is consistent with the step by step approach set out in the NPPG, and adopts recognised data sources, in particular Experian expenditure and projections. The methodology is described in Appendix 1 of the Town Centres Study (Part 1).
- 10.1.3 The quantitative capacity analysis adopts a study area covering the catchment areas of the main shopping destinations in Rushmoor and Hart Districts. It is sub-divided into nine zones for more detailed analysis (see Appendix 1 of the Town Centres Study (Part 1)). The study models shopping/leisure patterns based on the results of a household telephone survey conducted in September 2014 (1,200 interviews). The retail floorspace projections take into account the cross flows of expenditure to and from the District. The strategy for Hart District seeks to maintain market shares and to counter the effects of retail development proposals elsewhere by, in part, proposing additional retail floorspace provision over the plan period.
- 10.1.4 The requirements for additional retail floorspace over the plan period are set out in draft Policy SSI, which directly correlate with the recommendations of the Town Centres Study. The figures quoted in Policy SSI relate to sales floorspace (sq.m net) up to 2032, based on the SHMA population growth scenario. The convenience goods floorspace projection (5,900 sq.m net) is taken from Table 17B in Appendix 2 (Part 1), also summarised in Table 4.4 (page 23, Part 1). The comparison goods floorspace projection (3,690 sq.m net) is from Table 16B in Appendix 3 (Part 1), also summarised in Table 4.8 (page 28, Part 1).
- 10.1.5 It should be noted that the floorspace figures shown in Table 6.4 (page 42, Part 1) (as repeated in Table 1.2, page 3 in Part 2) and Table 6.8 (page 44, Part 1) (as repeated in Table 1.4, page 4 in Part 2) relate to gross floorspace not net sales, and are therefore higher. Net sales floorspace as defined in the NPPF 2012 is **“retail floorspace devoted to the sale of goods, excluding storage space”**. Gross is defined as **“total external floorspace including exterior walls”**. The difference in definitions may explain the confusion caused by the various tables within the Town Centres Study.
- 10.1.6 The requirements for the additional **net** retail floorspace over the plan period as set out in draft Policy SSI therefore directly correlate with the recommendations of the Council’s retail evidence, the Retail, Leisure and Town Centres Study 2015 (Part 1 and 2).

10.2 How is the Plan seeking to deliver the identified need for additional floorspace in the Town, District and Local centres, as set out in the Retail, Leisure and Town Centres Study 2015? Is the Plan positively prepared in this regard?

- 10.2.1 In response to paragraph 23 of the NPPF 2012, the Town Centres Study identified additional floorspace required in the District over the plan period. The study also identified suitable locations for this additional retail floorspace, advocating that most of the future growth is expected to be accommodated in Fleet town centre, as the main town centre with the best prospects for attracting investment and with the greatest development site potential (See Section 4, Part 2). The Town Centres Study indicated that the existing units would help to accommodate growth, in terms of increased turnover densities and a reduction in vacancy rates. The reoccupation of vacant units was expected to accommodate about 1,800 sq.m gross (1,300 sq.m net) of Class A1 to A5 floorspace. The remainder of retail floorspace will be provided by additional floorspace.
- 10.2.2 In accordance with the recommendations of the Town Centres Study, the draft policy SSI confirms the quantum as well as the broad location for additional retail floorspace over the plan period. Draft policies SS2, SS3, ED4, ED5 and ED6 confirm the framework for providing this additional retail floorspace alongside other main town centre uses.
- 10.2.3 The identification of the town, district and local centre boundaries in draft policy ED4 (some of which have been expanded from the previous plan period) provides certainty regarding the areas in which retail and main town centre development will be encouraged but also provides flexibility by potentially allowing any site within the centre to come forward. In addition to the centre boundaries, draft policy ED5 also identifies a Primary Shopping Area (PSA) within Fleet Town Centre. In response to recommendations with the Town Centres Study, the PSA has been extended to include land previously described as a secondary retail area. This additional area, which is predominantly retail, is well connected and significantly increases the size of the PSA, thereby the opportunity for new retail and main town centre use floorspace.
- 10.2.4 This approach is preferable to the reasonable alternative, which would consist of allocating sites identified in the Town Centres Study, which are not necessarily supported by their local communities. This could undermine new opportunities coming forward to meet the retail need, which are likely to be driven through current developing projects such as the Fleet Neighbourhood Plan.
- 10.2.5 The draft Plan does not therefore promote specific site allocations to meet future town centre floorspace provision. (Hartland Park is the exception as the site has an extant planning permission for residential-led redevelopment, which includes a local neighbourhood centre.) The draft Plan does enable either a subsequent DPD(s) or the relevant Neighbourhood Plans to consider site allocations in more detail. In addition to the site allocations, there is also an opportunity for the quantum of need for floorspace to be monitored and updated at the subsequent DPD(s) or the relevant Neighbourhood Plans stage. Alternatively this will occur at the five year plan review.

10.2.6 Each of the District’s Centres has a corresponding Neighbourhood Plan Area;

Table 1: Neighbourhood Plan Update

Centre	Neighbourhood Area	Update on the Neighbourhood Plan
Fleet Town Centre	Fleet Neighbourhood Area	Preparing Regulation 18 Plan
Blackwater District Centre	Blackwater and Hawley Neighbourhood Area	Early stages of plan preparation
Hook District Centre	Hook Neighbourhood Area	Preparing Regulation 18 Plan
Yateley District Centre	Yateley Neighbourhood Area	Early stages of plan preparation
Hartley Wintney Local Centre	Hartley Wintney Neighbourhood Area	Preparing Regulation 18 Plan
Odiham Local Centre	Odiham Neighbourhood Area	Made (2017)

10.2.7 The draft Local Plan’s strategic approach establishes the quantum and broad location of future town centre development, whilst empowering Neighbourhood Plan areas to positively influence the development of their centres. Alternatively, the Development Management DPD (estimated adoption Spring 2020) or a specific DPD concerning the regeneration of the District’s centres could consider site allocations in more detail.

10.2.8 In setting out the strategic growth and management of centres over the plan period, the draft Local Plan positively plans for the future strategic development needs of the town, district and local centres. It is therefore concluded that the draft Local Plan’s retail policies are consistent with national policy and have been positively prepared.

10.3 To be positively prepared and consistent with national policy should the Plan identify primary and secondary frontages of the town centres/primary shopping areas?

10.3.1 Paragraph 23 of the NPPF 2012 states that local planning authorities should “**define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations**”. The NPPF 2012 glossary indicates that Primary Shopping Areas (PSA) are defined areas where retail development is concentrated, generally comprising primary and secondary frontages. The new NPPF 2018 at paragraph 85(b) and glossary reiterates this approach, but removes reference to primary and secondary frontages stating that centre boundaries/PSAs should be “**part of a positive strategy for the future of each centre**”.

10.3.2 In response to paragraph 23, the Town Centres Study undertook a detailed review of town, district and local centre boundaries and frontages in Hart District. The NPPF 2012 does not indicate that PSA, primary and secondary frontages must be designated in all centres. The need for these designations will vary based on local circumstances. The study therefore addressed three key questions, as follows:

- 1 Is it necessary to designate separate town centre boundaries and primary shopping areas in each centre?
- 2 Is it necessary to define separate primary and secondary shopping frontages?
- 3 Should the designated shopping frontages relate to the same area as the primary shopping area (PSA)?

10.3.3. Based on the above, the Town Centres Study made the following recommendations for each of the centres with regards to primary shopping areas and shopping frontages (pages 29-36, Part 2):

Table 2: Summary of the Town Centres Study (PSA and Shopping Frontages)

Centre	Primary Shopping Area	Shopping Frontages
Fleet Town Centre	There is a clearly identifiable area of predominately retail uses (Use Class A), which contributes to the core retail offer of the town centre and would identify as a PSA. There are also high concentrations of other main town centre uses located beyond the core retail offer or PSA but within the town centre. A PSA can clearly be identified and therefore justified. (See para 3.23-3.25, Part 2)	Within the identified PSA, there is a sub-area where 78% of units are A1 retail. This area is identifiable as a primary shopping frontage. The remaining areas have a lower percentage of A1 units and identify as secondary shopping frontages. Primary and secondary frontages can therefore be justified. (See para 3.26-3.27, Part 2)
Blackwater District Centre	It is not essential to define a separate PSA, although the majority of the centre to the west of Vicarage Road would identify as a PSA with a smaller area to the east lying beyond the PSA. (See para 3.44, Part 2)	The dominant retail frontages are located to the west of Vicarage Road and these could be defined as primary shopping frontages (alternatively as a PSA) (See para 3.44, Part 2)
Hook District Centre	There is no dominant retail sub-area within the district centre boundary. A PSA can therefore not be justified. (See para 3.37, Part 2)	There are no retail frontages more dominant (in terms of A1 uses) than any other within the district centre boundary. Primary and secondary frontages cannot therefore be justified. (See para 3.37, Part 2)

Yateley District Centre	There is no dominant retail sub-area within either of the two district centre boundaries. PSA(s) can therefore not be justified. (See para 3.50, Part 2)	There are no retail frontages more dominant (in terms of AI uses) than any other within either of the district centre boundaries. Primary and secondary frontages cannot therefore be justified. (See para 3.50, Part 2)
Hartley Wintney Local Centre	There is no dominant retail sub-area within the local centre boundary. A PSA can therefore not be justified. (See para 3.30, Part 2)	All frontages within the local centre boundary have the characteristic of a primary shopping frontage. Primary frontages can therefore be justified. (See para 3.31 – 3.32, Part 2).
Odiham Local Centre	There is no dominant retail sub-area within the local centre boundary. A PSA can therefore not be justified. (See para 3.40, Part 2)	There are no retail frontages more dominant (in terms of AI uses) than any other within the local centre boundary, primary and secondary frontages cannot therefore be justified. (See para 3.40, Part 2)

- 10.3.4 The Council agreed with the majority of the above recommendations, which informed the relevant draft Local Plan Policies (and Policies Map).
- 10.3.5 Primary and secondary shopping frontages were not provided for Fleet Town Centre, although justified by the retail evidence. The Council acknowledges that the NPPF 2018 removes references to retail frontages and emphasises planning policies that promote town centres' vitality and viability by allowing them to grow and diversify in a way that can respond to rapid changes in the retail/leisure industries as well as allow a suitable mix of uses (paragraph 8(a)). Furthermore, it is noted that recent changes to the GPDO allow more flexibility for the use of smaller shop units, which can no longer be controlled through frontage policies.
- 10.3.6 The Council's preferred approach is to establish the requirement for both primary and secondary shopping frontages within the draft Local Plan (paragraph 247) and to enable either a subsequent DPD or the Fleet Neighbourhood Plan to consider their role in more depth.
- 10.3.7 The Town Centres Study suggested several potential options for Blackwater. Based on the evidence, the Council opted to enlarge the district centre boundary to incorporate the main concentration of retail and service uses in the village rather than identify a PSA or primary or secondary boundaries. Whilst it may be possible to identify a PSA within the district centre boundary, given the dispersal of retail uses across the centre, there would only be a very small area outside of the PSA but within the district centre. And, whilst the western end of the District Centre dominates in terms of AI units, the disjointed nature of the district centre would make any proposed primary and secondary frontages contrived. With consideration to the character of Blackwater District Centre and mindful of the guidance in the NPPF 2018, the Council considers that the evidence provided in the Town Centres Study does not provide compelling justification for either a PSA or primary or secondary frontages.

- 10.3.8 The Town Centres Study also suggested that whilst defining a PSA for Hartley Wintney was not justified, primary shopping frontages could be. All frontages within the local centre boundary have the characteristic of a primary shopping frontage. As there is no retail frontage more dominant (in terms of A1 uses) than another, and mindful of the guidance in the NPPF 2018, the Council considers in this case defining every frontage in the local centre would not be necessary.
- 10.3.9 Paragraph 259 of the draft Local Plan states that **“Neighbourhood Plans may provide further policies on district and local centres”**. It is therefore the Council’s preferred approach to enable Neighbourhood Plans to consider their respective centre’s role in more depth and this could include the provision of PSA and primary and secondary frontages if they can be fully justified.
- 10.3.10 The Council’s strategy enables the draft Local Plan to be positively prepared by providing up-to-date centre and PSA boundaries as well as enabling further detailed and locally focused planning guidance. It is therefore concluded that the draft Local Plan’s retail policies are consistent with national policy and have been positively prepared.

10.4 Overall, does the Plan fulfil the requirements of Paragraph 23 of the National Planning Policy Framework (2012)?

- 10.4.1 The draft Local Plan policies fulfil the requirements of paragraph 23 of the NPPF 2012 as follows:

Table 3: Draft Local Plan Retail Policies in the Context of Paragraph 23 of NPPF 2012

Paragraph 23	Local Plan Strategy
Support centre’s viability and vitality	Draft policies ED4, ED5 and ED6 retain and enhance existing centres by positively promoting appropriate development for main town centre uses within the centres. ED4 also utilises the NPPF 2012’s sequential and impact tests in relation to development for main town centre uses that are not located in centre, to assess any impact on the vitality and viability of existing centres.
Define a network and hierarchy of centres	Draft policy ED4 sets out the hierarchy of the town, district and local centres which provides a robust framework to manage future economic changes.
Define town centres, primary shopping area, primary and secondary frontages and set relating policies	The Local Plan Proposals Map defines the boundaries of all of the centres (town, district and local) and also defines the Primary Shopping Area (PSA) in Fleet Town Centre as supported by the Council’s Town Centres Study. The Town Centres Study also evidences that with the exception of Fleet Town Centre, PSA and primary and secondary frontages are not justifiable in the majority of other centres. Primary and secondary shopping frontages are justified within Fleet’s PSA, however the Council’s preferred approach is to establish the requirement for both primary and secondary shopping frontages within the draft Local

	Plan (paragraph 247) and to enable either a subsequent DPD or the Fleet Neighbourhood Plan to consider their role in more depth.
Promote competitive town centres which reflect the individuality of town centres	Draft policies ED5 and ED6 promote main town centre uses that respect the individual characters of the District's centres. The Local Plan also enables either a subsequent DPD(s) or relevant Neighbourhood Plan to provide more detailed and local-centric planning guidance for the respective centres.
Retain and enhance existing markets and where appropriate, re-introduce or create new ones	<p>Draft policies ED4, ED5 and ED6 promote the retention and enhancement of existing centres by positively promoting appropriate development for main town centre uses within the centres as well as utilising the NPPF 2012's sequential and impact tests in relation to development for main town centre uses that are not located in centre, to assess any impact on the vitality and viability of existing centres.</p> <p>Draft policies SS2 and SS3 promote the creation of neighbourhood and local centres to support the new settlements at Hartland Park and Murrell Green/Winchfield.</p>
Allocate a range of suitable developable sites in centres for main town centre uses (edge of centre and out of centre if suitable and viable town centre sites are not available)	<p>The draft Local Plan's strategic approach establishes the quantum and broad location of future development for main town centre uses.</p> <p>The draft Local Plan enables either a subsequent DPD(s) or the relevant Neighbourhood Plan to allocate sites, or to consider site allocations in more depth.</p>
Set out policies to encourage residential development on appropriate sites	Several amendments have been proposed by the Council to draft policies ED5 and ED6 to ensure that residential development is encouraged in a manner which will promote the vitality of centres.
Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.	In accordance with the Council's Town Centres Study, the boundaries of some of the District's centres have been redrawn to ensure that the centre focuses the main town centre uses in an area that can remain attractive and competitive, thereby positively planning for the future.

10.4.2 In summary, the draft Local Plan fulfils the requirements of paragraph 23 of the NPPF 2012.

Policy ED4

10.5 Is the retail hierarchy set out in Policy ED4 justified?

- 10.5.1 Paragraph 23 of the NPPF 2012 states that Local Authorities should “**define a network and hierarchy of centres that is resilient to anticipated future economic changes**”. The Council’s Town Centres Study provides the evidence which informed the town centre hierarchy presented in draft Local Plan policy ED4.
- 10.5.2 The Town Centres Study is based on town centre health checks and a household telephone survey. This methodology is robust and in line with the NPPF 2012 and NPPG.
- 10.5.3 The Town Centres Study’s health checks and analysis of existing facilities confirmed that Fleet is the main comparison goods shopping destinations within the District. It has a critical mass of convenience and comparison shopping floorspace (over 17,000 sq.m net) and a good range of non-retail services with 216 shop units in total. The other centres in the District are much smaller, serving their respective settlements and providing a more limited range of shops and non-retail services. These centres are similar in terms of the number of retail and service uses (about 30 to 50 units), although the size of the units in terms of retail sales floorspace varies. Blackwater (with over 3,100 sq.m net floorspace), Hook (with over 2,300 sq.m net floorspace) and Yateley (with over 4,200 sq.m net floorspace) are the next largest centres and have been designated as District Centres, below Fleet in the hierarchy. Hartley Wintney (less than 1,600 sq.m net) and Odiham (about 900 sq.m net) are much smaller and have been designated as Local Centres.
- 10.5.4 These findings are in line with the Javelin Venuescore UK Shopping Index (which ranks the UK’s top 2,500 retail destinations). This information is widely adopted in the retail industry and provides a useful guide to the shopping destination’s offer. Fleet is the highest ranked centre in the District with a Venuescore of 73, the next highest is Blackwater at 21.
- 10.5.5 The hierarchy of centres is also informed by the household survey results, which were used to estimate the catchment area, market share and expenditure retention of each centre as well as the flow of expenditure leaking from the District to surrounding centres.
- 10.5.6 The survey results indicate that Fleet is the only town that retains a reasonable proportion of comparison goods retail expenditure within its respective catchment area. In terms of retention of convenience shopping, Blackwater, Hook and Yateley retain a reasonable proportion of convenience goods retail expenditure within their respective catchment areas, but Hartley Wintney and Odiham retain relatively low levels of expenditure.
- 10.5.7 Based on this analysis, draft policy ED4 is clear in terms of the hierarchy of centres. It reflects the current situation in terms of shopping patterns and the scale and provision of retail and town centre uses and is therefore justified.

10.6 Is a 1,000 square metre threshold requirement for a retail impact assessment justified?

- 10.6.1 The NPPF 2012, at paragraph 26, advocates the use of proportionate, locally set floorspace thresholds to trigger impact assessments for retail, leisure and office development proposals, where the proposal is located outside of designated town centres.

10.6.2 The NPPG provides the context in which proportionate, locally set impact threshold should be considered:

- * scale of proposals relative to centres;
- * the existing viability and vitality of centres;
- * cumulative effects of recent developments;
- * whether local town centres are vulnerable;
- * likely effects of development on any town centre strategy; and
- * impact on any other planned investment.

10.6.3 The Town Centres Study acknowledges that the first and third factors listed above are of relevance to Hart District. Table 6B in Appendix 3 of the Town Centres Study (Part 1) demonstrates that development of just less than 2,500 sq.m gross could have a significant adverse impact, as most centres within Hart would be dwarfed by such development. These centres have total comparison goods retail floorspace of only between 800 to 1,400 sq.m gross, almost half of the 2,500 sq.m threshold. In addition, a single development proposal of just less than 2,500 sq.m would exceed the entire short term (up to 2022) floorspace projections for most centres in the District, without the need for an impact assessment.

10.6.4 The Town Centres Study therefore advises that the 2,500 sq.m gross threshold is inappropriate as a blanket threshold and recommends a reduced locally set threshold of 1,000 sq.m gross based on the retail floorspace projections. In accordance with the Town Centres Study, policy ED4 advocates that development for main town centre uses exceeding 1,000 sq.m should be supported by an impact assessment. It is therefore concluded that the proposed local threshold is fully justified.

10.6.5 *Please note, there is a typographical error in draft policy ED4. Reference to floorspace exceeding 1,000sq.m should state that this is **gross** rather than **net**.*

10.7 Does Policy ED4 preclude positive re-development opportunities?

10.7.1 Policy ED4 is positively worded and provides a strategic framework to guide development, redevelopment and change of use proposals. In defining the town, district and local centre boundaries, policy ED4 provides certainty of the areas in which development for main town centre use will be encouraged and also provides flexibility by potentially allowing any site within the boundary of the centre to come forward.

10.7.2 The policy advocates proposals for main town centre uses that maintain and improve the role of the centre in accordance with its hierarchy will be supported. In order to support the centres and deliver new development, the policy seeks to encourage applications for retail uses to come forward by providing a clear and simple development framework that accords with the NPPF 2012. There are no aspects of the policy that would therefore preclude positive re-development opportunities.

10.8 Overall, is Policy ED4 consistent with national policy and justified?

10.8.1 In accordance with bullet point 1 of paragraph 23 of the NPPF 2012, draft policy ED4 recognises that centres are the heart of their communities and emphasises the need to

maintain retail and local services that cater for local day to day needs. In accordance with bullet point 2 of paragraph 23, draft policy ED4 sets out the retail hierarchy for the District based upon the recommendations of the Council's Town Centres Study and is therefore fully justified. In accordance with bullet point 3 of paragraph 23, draft policy ED4, as defined on the Policies Maps, establishes the town centre boundaries of each of the centres within the District based upon the recommendations of the Council's Town Centres Study and therefore the established boundaries are fully justified. In accordance with bullet point 4 of paragraph 23, draft policy ED4 positively encourages development proposals for main town centre uses to provide choice and diversity. It also advocates that development proposals reflect the individual characters of the centres by respecting the scale, function and character of the centre.

- 10.8.2 Following guidance within paragraph 24 of the NPPF 2012, draft policy ED4 reiterates the need to undertake the sequential test for proposals for main town centre uses, which are not in a defined centre. Paragraph 25 confirms that the sequential test should not be applied to applications for other small scale rural development and therefore in response, and to support the rural economy, draft policy ED4 confirms that proposals for main town centre uses of less than 100sq.m located within the countryside will not be required to apply a sequential test.
- 10.8.3 Paragraph 26 of the NPPF 2012 promotes locally set floorspace thresholds for impact assessments. In response, draft policy ED4 sets out a locally set floorspace threshold of 1,000 sq.m based upon the recommendations of the Council's Town Centres Study and as such is fully justified.
- 10.8.4 It is therefore concluded that draft policy ED4 is consistent with national policy and is fully justified.

Policy ED5

10.9 To be positively prepared, should Policy ED5 set out the need for additional floorspace within Fleet?

- 10.9.1 Draft policy SSI sets out the planned quantum and broad location of new retail development to be built in Hart over the Plan period. The policy makes provision for approximately 5,900 sq.m (net) of additional convenience and 3,960 sq.m (net) of additional comparison floorspace in the District. The policy states that the majority of this additional floorspace will be focussed within Fleet Town Centre because, as the largest centre in the District, the town centre has the best prospects for attracting investment and has the greatest development site potential (See Section 4 of the Town Centres Study, Part 2).
- 10.9.2 Following on from draft policy SSI, draft policy ED5 directs additional convenience and comparison retail floorspace to the Primary Shopping Area (subject to certain criteria) in the first instance and then to the town centre in the second, whilst other main town centre uses (e.g. offices, hotels and leisure) are primarily directed to the town centre. Draft policy ED5 does not prescribe a fixed amount of additional floorspace within Fleet town centre.
- 10.9.3 Fleet competes with a number of other medium sized towns located on its doorstep. In addition residents also have good access to regional and sub-regional centres. Securing investment into Fleet town centre has always been challenging. The Council acknowledges that the current trends in the retail market are likely to be longer term and by not prescribing a fixed amount of additional floorspace for Fleet but by defining the preferred location, the

ability to attract retail-led redevelopment of Fleet's Town Centre is maximised. Equally, by not prescribing a fixed amount of additional floorspace for Fleet and by potentially allowing additional floorspace to be provided in any of the other centres in the District (subject to the provisions of ED6), draft policy ED5 therefore is more flexible and able to provide greater resilience to anticipated future retail and economic changes.

10.9.4 In this way, draft Policy ED5 encourages the positive planning of Fleet Town Centre and therefore is positively prepared.

10.10 To be effective and consistent with national policy, should Policy ED5 refer to residential development and/or mixed-use developments?

10.10.1 Paragraph 23 of the NPPF 2012 recognises that “*residential development can play an important role in ensuring the vitality of centres*”. The Council proposes a modification (FPM 47) to reference the potential for residential development within the Primary Shopping Area;

Criterion b)

Be for a main town centre use, which retains or provides an active frontage. Residential use may be appropriate above retail or commercial units providing the active frontage is not compromised and that satisfactory residential amenity can be achieved.

10.10.2 The proposed modification would thereby allow mixed-use development compromising of main town centre uses as well as residential that maintains or enhances the vitality and viability of Fleet Town Centre. By virtue of the wide range of uses categorised as ‘main town centre uses’, in addition residential uses, policy ED5 would not preclude mixed-use developments.

10.11 Is Policy ED5 positively prepared and does it plan positively for re-development opportunities?

10.11.1 Policy ED5 is positively worded and provides a framework to guide development, redevelopment and change of use proposals. In defining the town centre and PSA, policy ED5 provides certainty regarding the areas in which development for main town centre use will be encouraged but also provides flexibility by potentially allowing any site within the area to come forward. In response to recommendations within the Town Centres Study, the PSA has been extended to include land previously described as a secondary retail area. This additional area, which is predominantly retail in character, is well connected and significantly increases the size of the PSA, thereby the opportunity for new retail and main town centre use floorspace and potential investment. This approach is preferable to the reasonable alternative, which would consist of allocating sites identified in the Town Centres Study, which are not necessarily supported by their local communities. This could undermine new opportunities coming forward to meet the retail need which are likely to be driven through current developing projects such as the Fleet Neighbourhood Plan. In this regard, the draft policy plans positively for re-development opportunities.

10.11.2 The policy advocates proposals for main town centre uses that maintain or enhance the vitality and viability of Fleet Town Centre will be supported. In order to support the delivery of new development, the policy seeks to therefore encourage applications for retail uses to come forward by providing a clear and simple development framework that accords with the NPPF

2012. There are no aspects of the policy that would therefore preclude positive re-development opportunities.

10.12 Overall, is Policy ED5 consistent with national policy and justified?

10.12.1 In accordance with bullet point 1 of paragraph 23 of the NPPF 2012, draft policy ED5 promotes development which would maintain or enhance the vitality and viability of Fleet Town Centre. In accordance with bullet point 3 of paragraph 23, draft policy ED5, as defined on the Policies Maps, establishes the PSA for Fleet Town Centre based upon the recommendations of the Council's Town Centres Study and therefore the boundary is fully justified. In accordance with bullet points 4 and 5 of paragraph 23, draft policy ED5 positively encourages development proposals for main town centre uses which reflect and enhance the main town centre characteristics of Fleet Town Centre. In accordance with bullet point 9 of paragraph 23, draft policy ED5 (as modified) recognise that residential development can play an important role in ensuring the vitality of centres and encourages residential development on appropriate sites.

10.12.2 It is therefore concluded that draft policy ED5 is consistent with national policy and is fully justified.

Policy ED6

10.13 To be positively prepared, should Policy ED6 set out the need for additional floorspace within each of the District and Local centres?

10.13.1 Draft policy SSI sets out the planned quantum and broad location of new retail development to be built in Hart over the Plan period. The policy makes provision for approximately 5,900 sq.m (net) of additional convenience and 3,960 sq.m (net) of additional comparison floorspace in the District. The policy states that the majority of this additional floorspace will be focussed within Fleet Town Centre, with new retail provision also promoted within existing district and local centres.

10.13.2 Following on from draft policy SSI, draft policy ED6 directs additional main town centre use floorspace to the district and local centres. Draft policy ED6 does not however prescribe a fixed amount of additional floorspace within either the district or local centres.

10.13.3 The district and local centres historically have low vacancy rates and provide a reasonable range of local retail and services uses, although the Town Centres Study evidences a number of improvements for each of the centres including additional retail floorspace and urban realm improvements. The Council acknowledges that the current trends in the retail market are likely to be longer term and, by not prescribing a fixed amount of additional floorspace but by defining the preferred location, the ability to attract additional retail floorspace is maximised. Draft policy ED6 therefore is more flexible and able to provide greater resilience to anticipated future retail and economic changes.

10.13.4 In this way, draft Policy ED6 encourages the positive planning of the District's district and local centres and is therefore positively prepared.

10.14 To be effective and consistent with national policy, should Policy ED6 refer to residential development and/or mixed-use developments?

10.14.1 Paragraph 23 of the NPPF 2012 recognises that “*residential development can play an important role in ensuring the vitality of centres*”. The Council proposes a modification (FPM 48) to reference the potential for residential development within the district and local centres;

Criterion c)

The proposal is for a main town centre use, which retains an active frontage. Residential use may be appropriate above retail or commercial units providing the active frontage is not compromised and that satisfactory residential amenity can be achieved

10.14.2 The proposed modification would thereby allow mixed-use development, including residential, which maintains or enhances the vitality and viability of district and local centres. By virtue of the wide range of uses categorised as ‘main town centre uses’, in addition to residential, policy ED6 would not preclude mixed-use developments.

10.15 Is Policy ED6 positively prepared and does it plan positively for re-development opportunities?

10.15.1 Policy ED6 is positively worded and provides a framework to guide development, redevelopment and change of use proposals. In defining the centre boundaries, policy ED6 provides certainty regarding the areas in which development for main town centre use will be encouraged but also provides flexibility by potentially allowing any site within the centre to come forward. This approach is preferable to the reasonable alternative, which would consist of allocating sites identified within the Town Centres Study, which are not necessarily supported by their local communities. This could undermine new opportunities coming forward to meet the retail need which are likely to be driven through current developing projects such as the respective Neighbourhood Plans. In this regard, the draft policy plans positively for re-development opportunities.

10.15.2 The policy advocates proposals for main town centre uses that maintain or enhance the vitality and viability of the district and local centres will be supported. In order to support the delivery of new development, the policy seeks to therefore encourage applications for retail uses to come forward by providing a clear and simple development framework that accords with the NPPF 2012. There are no aspects of the policy that would therefore preclude positive re-development opportunities.

10.16 Overall, is Policy ED6 consistent with national policy and justified?

10.16.1 In accordance with bullet point 1 of paragraph 23 of NPPF 2012, draft policy ED6 promotes development which would maintain or enhance the vitality and viability of Hart’s district and local centres. In accordance with bullet points 4 and 5 of paragraph 23, draft policy ED5 positively encourages development proposals for main town centre uses which reflect and enhance the district and local centre characteristics. In accordance with bullet point 9 of paragraph 23, draft policy ED6 (as modified) recognises that residential development can play

an important role in ensuring the vitality of centres and encourages residential development on appropriate sites.

10.16.2 It is therefore concluded that draft policy ED6 is consistent with national policy and is fully justified.