

Barrow Borough Local Plan Examination

Hearing Statement Matter 9:

Retail

Barrow Borough Council

May 2018



Inspectors MIQ's:

Matter 9- Retail

Issue

Whether the approach to retail provision is justified, effective and consistent with national policy in the NPPF

Relevant policies R1 to R19

Questions

1. What is the evidence in terms of a requirement for additional capacity for retail (both comparison and convenience goods) and other main town centre uses at points throughout the plan period? Is there a need for additional floorspace and if so, how and where is it intended to provide for this?
2. How have the boundaries for Barrow and Dalton Town Centres been defined and on what basis? Are the boundaries appropriate and justified?
3. What is the basis for the boundary of the Primary Shopping Area in Barrow and is it appropriate and justified?
4. What is the basis for the approach set out in Policy R3? Is it justified and consistent with national policy?
5. Is policy R4 effective and justified and consistent with national policy? In particular, policy R4 (as well as R10 and R11) refers to an edge of centre site being one within 300m of a Primary Shopping Area whereas the Policies Map has particular defined areas depicted.
6. What is the basis for the thresholds at which impact assessments will be required (Policies R8 and R9) and are they justified?
7. Is a sequential test for new office developments (Policy R11) effective and justified and consistent with national policy?
8. Is policy R13 clearly worded (criterion a) so as to be effective?
9. Is policy R15 effective and justified? Is it too restrictive?
10. Is policy R19 effective and justified? In particular are the neighbourhood shopping areas properly identifiable, with clear boundaries?

Council Responses:

Issue 9 Retail

Question 1 Response:

1.1. Chapter 6 of the Retail and Town Centre Uses Study (EL7 001) assesses the Borough's retail needs. Table 6.1 of the Study sets out the convenience and comparison retail capacity over the periods to 2018, 2023 and 2027 for Barrow. Paragraph 6.18 states that existing convenience retail floorspace in Barrow is trading at below expected levels and that there is no need for additional floorspace to 2027. In terms of comparison, the additional capacity identified is significant in the long term. There has been a long-standing aspiration to develop the Hall Street car park site into a large retail unit with car parking. This is reflected in the boundaries of the Primary Shopping Area in the Local Plan. The Primary Shopping Area also incorporates Oldham Street car park, which could also potentially cater for future comparison needs.

1.2. Table 6.3 sets out the convenience and comparison retail capacity over the periods to 2018, 2023 and 2027 for Dalton. Paragraph 6.30 states that existing convenience retail floorspace in Dalton is trading at below expected levels and that there is no need for additional floorspace to 2027. In terms of comparison, the additional capacity identified is would support a small store or an extension to existing provision.

Question 2 Response:

2.1. Barrow's town centre boundary incorporates the Main Town Centre Uses in Barrow town centre. There is a significant concentration of main town centre uses along Duke Street, Abbey Road and Rawlinson Street, which circumnavigates the Primary Shopping Area in the town centre. The location of the main town centre uses means the town centre includes significant areas of residential development. These areas are identified as Residential Protection Areas in the Local Plan to protect the amenities of those living within such areas. It is proposed that the town centre boundary is amended to align with the Residential Protection Areas as set out in Appendix A. This amendment will also mean that the boundary better aligns with the Barrow Business Improvement District boundary.

2.2. The town centre boundary incorporates:

- Offices along Michaelson Road, namely Craven House and Fisher House.
- The Ambulance Station on Hindpool Road. This will soon be vacated, therefore providing opportunity for a new use or potential redevelopment.
- Commercial and retail units along Hindpool Road.
- Abbey Road, including offices, retail, library, county court, pubs and restaurants.

- Rawlinson Street, including commercial units, retail and a business centre. Also incorporates the rear of Whitehead Street, which includes a Tesco Express and a leisure use.
- Greengate Street, which forms a logical south western boundary to the town centre. This area is mainly residential, although the housing is within the boundary of Residential Protection Areas. It also incorporates the pubs on Schneider Square.

2.3. Dalton town centre is clearly defined by its concentration of main town centre uses.

Question 3 Response:

3.1. The NPPF Glossary (in both the current and draft NPPF (March 2018)) defines primary shopping areas as the “defined area where retail development is concentrated”. It allows for the proper application of the sequential approach when preparing proposals for retail uses outside of the primary shopping area.

3.2. Matter 9, Appendix C identifies the primary and secondary frontages in Barrow town centre. The primary frontages have a high proportion of retail uses and are located on Dalton Road, Portland Walk and part of Duke Street in front of the Town Hall. The secondary frontages contain a mixture of Main Town Centre Uses.

3.3. The primary shopping area incorporates the primary frontages. It also incorporates a proportion of secondary frontages where these have significant clusters of retail units, namely Cavendish Street and the south side of Scott Street. These side streets include a number of local independent shops. The Council requests a main modification amending the primary shopping area boundary to also include the north side of Scott Street where there is also a cluster of retail uses. See Appendix B for the amended boundary.

3.4. The Barrow Retail and Town Centre Uses Study (EL7 001), paragraph 9.17, states that it is considered appropriate to define the areas within the suggested Primary Shopping Frontage and Secondary Shopping Frontage (see paragraph 9.16 of the study) as the Primary Shopping Area. Since the study was produced, it has been considered necessary to alter the defined areas set out in paragraph 9.16 of the study, as some of the identified secondary frontages have limited retail uses. Namely, the following areas should be excluded: Dalton Road North; Furness House, fronting Schneider Square; the southern frontage of the Mall; and Crellin Street.

3.5. Hall Street and Oldham Street car parks have been added into the Primary Shopping Area, as these sites could each potentially accommodate a larger retail footprint.

Question 4 Response:

4.1. This policy is based upon the sequential approach set out in the NPPF. The NPPF Glossary (in both the current and draft NPPF (March 2018)) defines the Primary Shopping Area as the defined area where retail development is concentrated. The boundaries of the Primary Shopping Area are based upon the concentration of retail uses in the town centre.

The implementation of the policy will ensure that the vitality of the Primary Shopping Area is maintained and strengthened. It will also ensure that existing retail units will not become isolated.

Question 5 Response:

5.1. As set out in the NPPF Glossary (in both the current and draft NPPF (March 2018)), an edge of centre site that is appropriate for retail is one that is well connected and up to 300 metres from the primary shopping area. For all other main town centre uses, it is a location within 300 metres of the town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. To assist developers, and in light of comments received during consultation on the Local Plan Publication Draft, the Local Plan identifies potential edge of centre sites. The appropriate use on these sites would need to fall under the definitions in the NPPF, unless material considerations indicate otherwise. Prospective developers may identify other edge of centre sites which could be considered appropriate for development in line with policies R4, R10 or R11.

Question 6 Response:

6.1. The impact thresholds are based upon the recommendations in the Retail and Town Centre Uses Study (EL7 001). The NPPF (paragraph 26 of the current NPPF and paragraph 90 of the draft NPPF (March 2018)) suggest that the impact of retail developments of 2,500 sq m gross and above should be considered. However, it includes the option to set local impact thresholds that reflect local circumstances. Based upon the scale and role of Barrow and Dalton town centres, along with the study's retail floorspace projections, it is considered that the potential impact of development proposals of less than 2,500 sq m could be significant enough to warrant a consideration of impact. A comparison retail development of 2,500 sq m gross would account for a significant proportion of the projected capacity for retail floorspace in Barrow up to 2023 and could be significantly greater than the capacity identified in Dalton. The projections suggest that retail developments of less than 2,500 sq m gross could have a significant impact on the town centres in the Borough and that the Framework threshold is not appropriate to local circumstances in Barrow in Furness. See paragraphs 9.0-9.7 of the Retail and Town Centre Uses Study (EL7 001).

Question 7 Response:

7.1. This policy is consistent with the guidance in the NPPF. Paragraph 24 of the NPPF and paragraph 87 of the draft NPPF (March 2018) set out the sequential test for main town centre uses. They state that local planning authorities should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. The NPPF Glossary defines Edge of Centre for retail; other main town centre uses; and office development. Policy R11 ensures the application of the sequential approach for new office developments.

Question 8 Response:

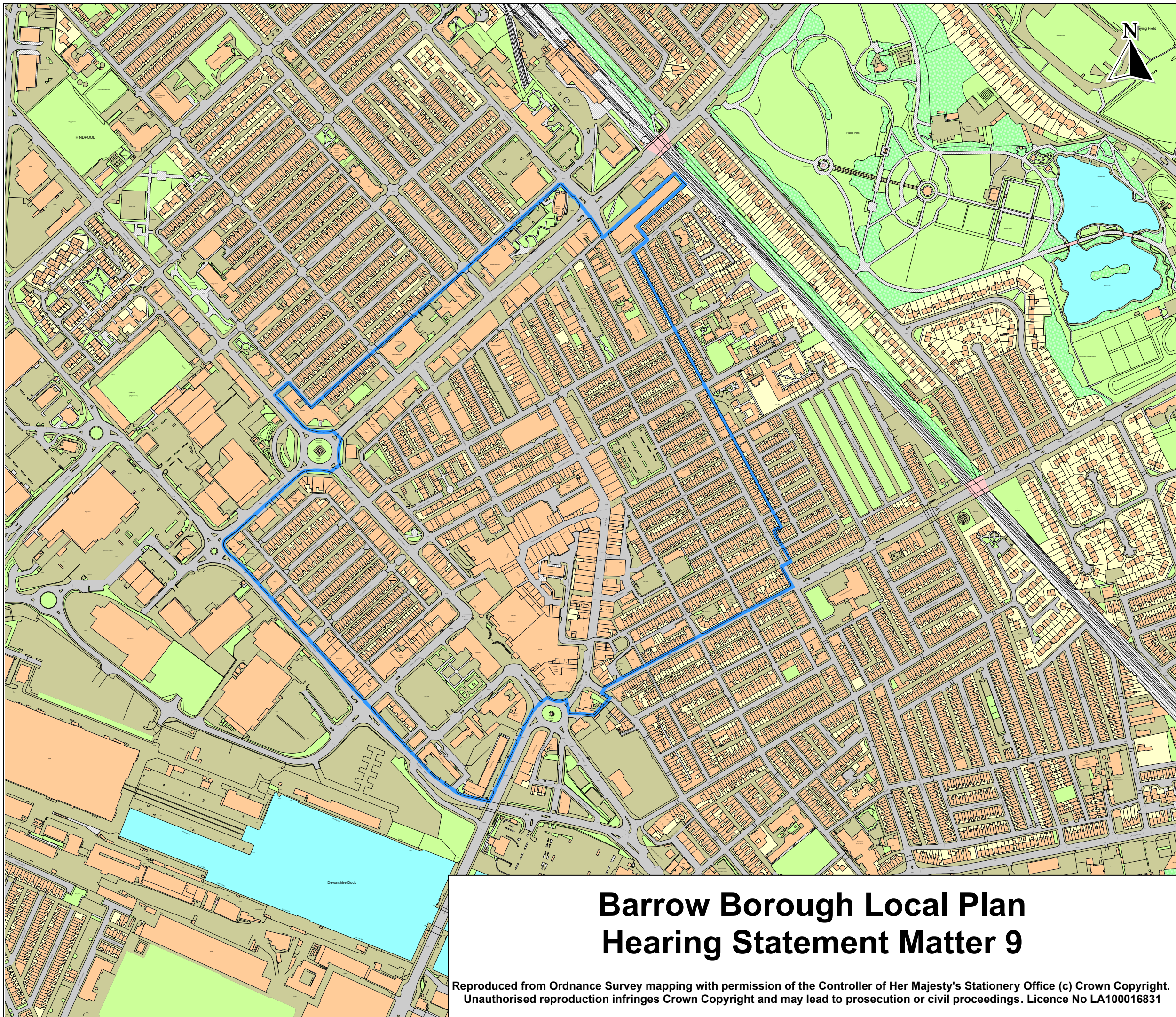
8.1. The purpose of criterion (a) is to steer the development of taxi offices away from purely residential neighbourhoods. Upon further consideration of the policy, the Council considers that criterion (a) should be deleted and that the following text is added to the start of criterion (b): “The site is not within a purely residential area and...” It is considered that this modification will provide more clarity for decision-makers.

Question 9 Response:

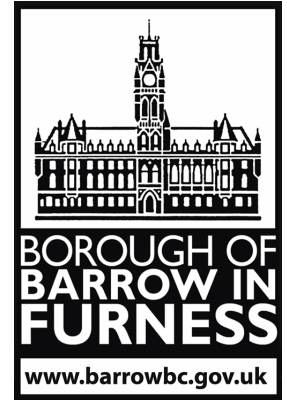
9.1. Upon further consideration of the policy, the Council considers that criterion (b) is overly restrictive and should be deleted. It is considered that criterion (c) is amended so that it reads “...no adverse impact upon *the local environment and residential amenity* by reason of noise, odour...” These amendments will strengthen this criterion in terms of protecting residential amenity.

Question 10 Response:

10.1. The location of the neighbourhood shopping areas is set out on the Local Plan Proposals Map and are listed in paragraph 8.10.2 of the Local Plan Submission Draft. It is considered that this is sufficient in identifying these areas and is flexible enough to allow for changes of use over time.



Appendix A May 2018



KEY

 Town centre

This map must be viewed in conjunction with the Green Infrastructure maps.

Electronic copies of this map in PDF format can be found at <https://data.barrowbc.gov.uk>

The maps can also be viewed online along with other council information at <https://webgis1.barrowbc.gov.uk/webgis>

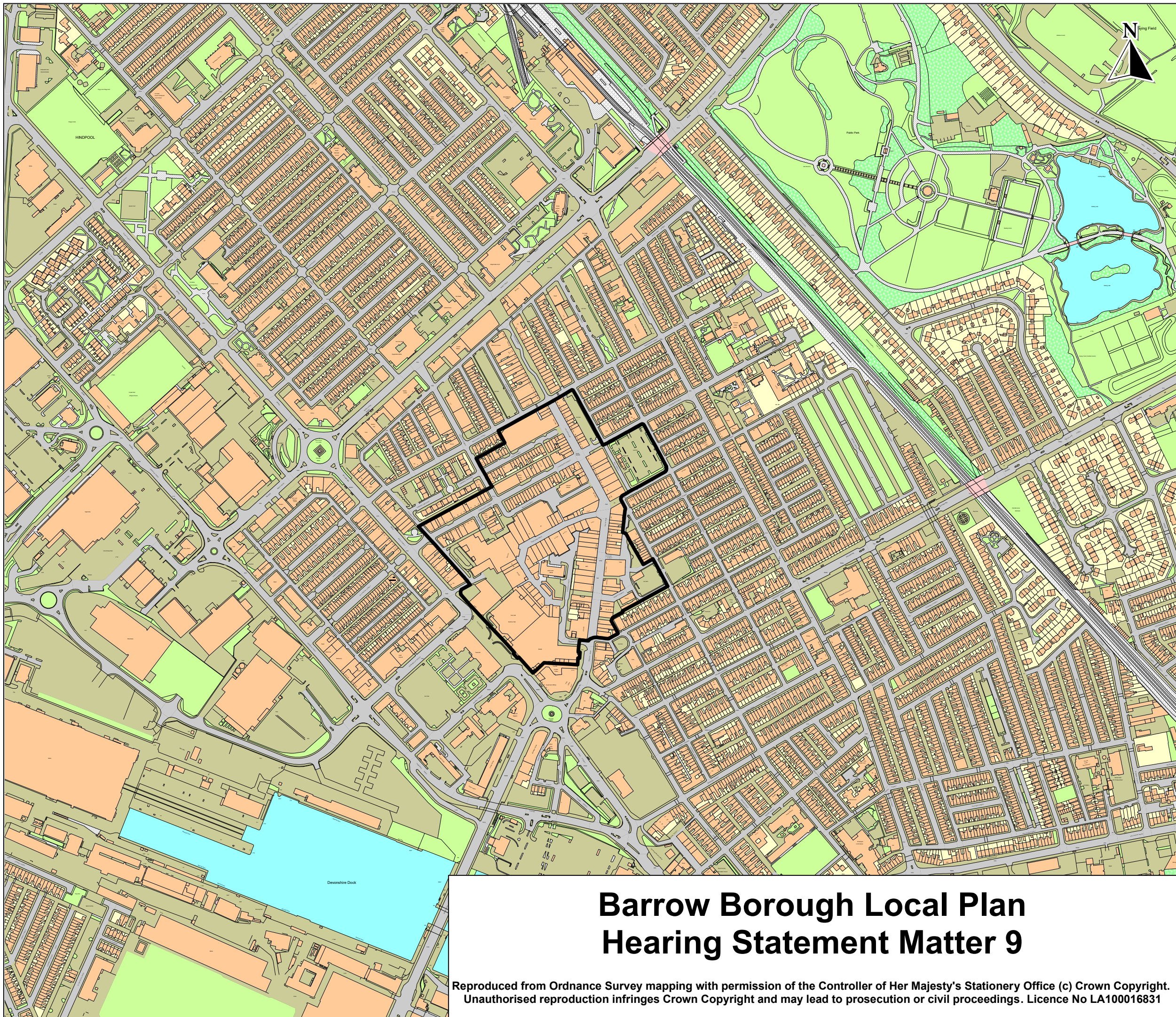
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Barrow Borough Local Plan Hearing Statement Matter 9

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Working together to support sustainable development within the Borough of Barrow-in-Furness





Appendix B May 2018



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 Barrow primary shopping area

This map must be viewed in conjunction with the Green Infrastructure maps.

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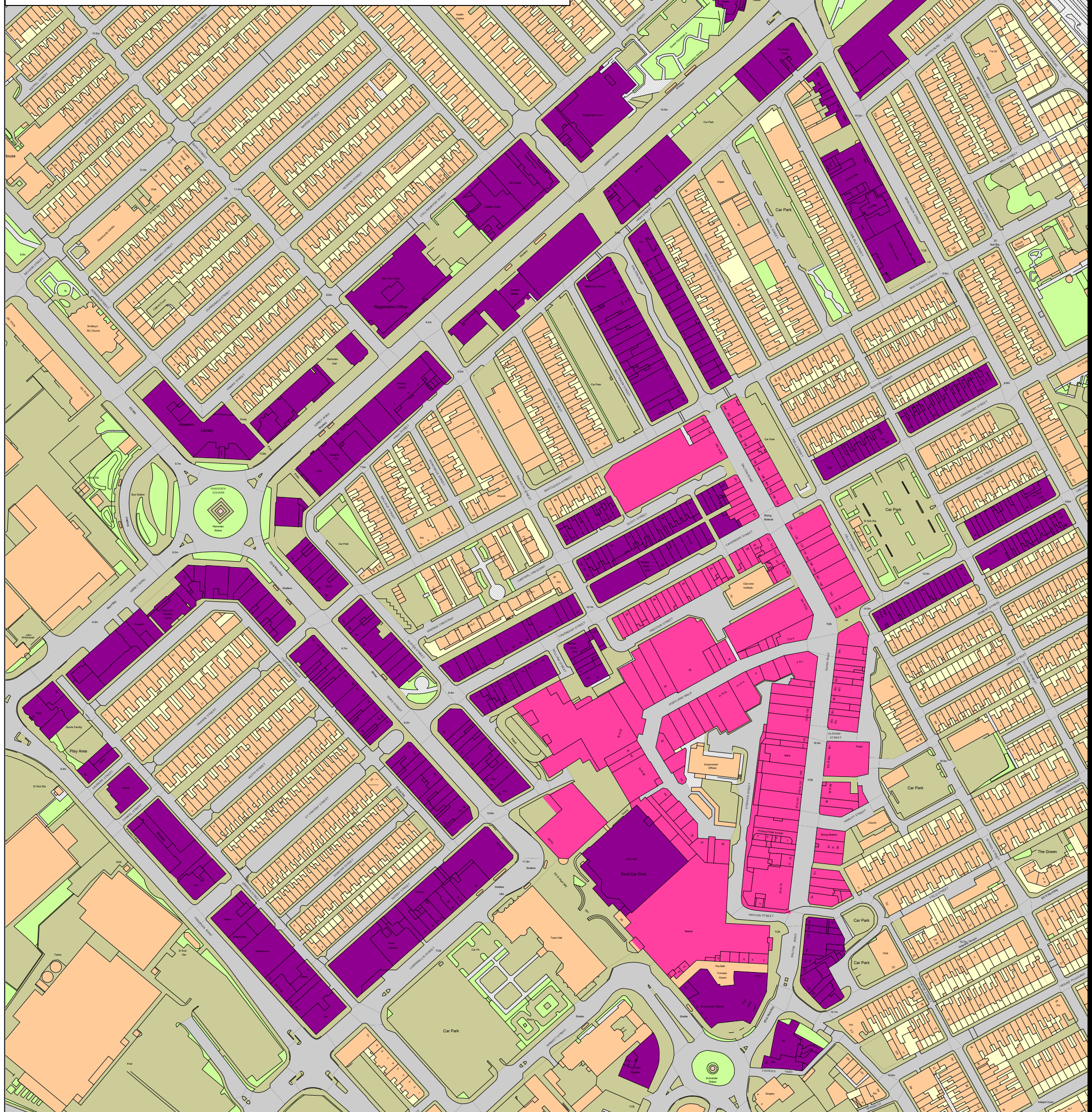
Working together to support sustainable development within the Borough of Barrow-in-Furness



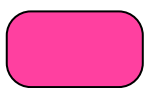
Barrow Borough Local Plan

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Primary Frontages



Secondary Frontages

