East Devon Local Plan

Evaluation of Town Centre and Retail Policy Boundaries and the threshold for the Sequential Test

September 2023

This report evaluates town centre and retail policy boundaries and the threshold at which the sequential test should apply. It will inform the draft of the new East Devon Local Plan.

Contents

1 Introduction

1.1 Town centres are literally at the heart of East Devon communities and are essential to ensuring that resident's everyday needs are met as locally as possible. Town centres have always demonstrated resilience to change, overcoming challenges from increased car ownership, out of town retail parks, the rise of supermarkets and an increase in online banking and access to public services, but they now face unprecedented pressure.

1.2 Retailing has for many years been the core activity in town centres but the pandemic, on top of loss of footfall due to increasing online purchases and slow recovery from the 2008 financial crisis and recession, has led to widespread concern about the future of town centre shops and facilities, and particularly High Streets.

1.3 This topic paper considers the current situation in East Devon and justifies the policies of the emerging Local Plan. It provides an assessment of boundaries for town centre and retail policies and explains why the national sequential test threshold is inappropriate and a lower threshold is justified in East Devon.

2 National Position

National Planning Policy and Government Strategy

2.1 Relevant legislation is set out in the overarching Town and Country Planning Act 1990 and the Planning Compulsory Purchase Act 2004.

2.2 Local planning authorities are required to address the requirements set out in National planning guidance in preparing their local plans, namely the National Planning Policy Framework (NPPF, December 2023) and supporting National Planning Policy Guidance (NPPG). At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. The NPPF provides that 'planning policies and decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation' (paragraph 85). Table 1 summarises the requirements of the NPPF and NPPG to achieve this.

Table 1 Summary of National Planning Policy Requirements

National Planning Policy Framework Summary	**Reference**
Define a network and hierarchy of town centres	90 a)
Promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes and reflects their distinctive characters	90 a)
Allow a suitable mix of uses including housing	90 a)
Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy	90 b)
Retain and enhance existing markets and, where appropriate, re-introduce or create new ones	90 c)

Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead	90 d)
Apply a sequential test to planning applications for main town centre uses that are not proposed in an existing centre	90 e)
Where town centre sites are not available, allocate well connected edge of centre sites and other appropriate sites for main town centre uses	90 e)
Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage housing on appropriate sites	90 f)
National Planning Policy Guidance (NPPG) (as updated 18 September 2020)	
Provide a positive vision or strategy for town centres	2b-002-20190722
Strategies should be based on evidence of the current state of town centres and take full account of relevant market signals and identify relevant sites, actions and timescales. Strategies should be prepared where a town is in decline to manage this positively to encourage economic activity and achieve an appropriate mix of uses.	2b-004-20190722
Improvements to the public realm, transport (including parking) and accessibility should be provided.	2b-004-20190722
The strategy should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.	2b-004-20190722
The health of town centres should be assessed against defined indicators[1].	2b-006-20190722

2.3 The NPPF 2018 removed the expectation for local authorities to define primary and secondary frontages within their town centres.

2.4 The NPPF definitions will be used in this paper. These are set out in Table 2.

Table 2 Most relevant NPPF definitions

Term	Definition
Edge of centre	For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

[1] Defined indicators refers to: proportion of vacant street level property; commercial yields on non-domestic property; customers' views and behaviour; retailer representation and intentions to change representation; commercial rents; pedestrian flows; accessibility; perception of safety and occurrence of crime and state of town centre environmental quality.

Main Town Centre Uses	• Retail development (including warehouse clubs and factory outlet centres); • Leisure; • Entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); • Offices; and • Arts, culture and tourism development (including theatres, museums, galleries, or a combination of the two)
Out of centre	A location which is not in or on the edge of a centre but not necessarily outside the urban area.
Out of town	A location out of centre that is outside the existing urban area.
Primary shopping area	Defined area where retail development is concentrated.
Town centre	Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

2.5 With regard to their strategy, the Government position, even pre-covid, is that 'transformation' is necessary if town centres are to thrive, but the type of intervention required to achieve this will vary from place to place. Without intervention there are risks:

- Loss of high streets' retail offer/employment
- Low incentive to invest
- Rundown image & decay
- Empty streets
- Vacuum, fragmentation, hollowing out
- Loss of the heart of places & communities

2.6 In recent years the Government has produced or endorsed a number of proposals for positive transformation. This started with the Portas Review of 2011, which set a vision for the future intended to 'breathe life back into the High Street'. In response to this, in order to enable the High Street to quickly adapt and addressing the problem of vacancy and stagnation, changes to the planning system were introduced in 2015 which allowed for greater flexibility and changes between the use classes as permitted development. This was followed by 'Our Plan for the High Street' as part of the Budget in 2018, which promised Government funding through the 'Future High Streets Fund' in order for High Streets to focus on users 'experience', making them more convenient, acting as a focus for services and engendering a sense of community.

2.7 In 2019 the High streets and town centres in 2030 (parliament.uk) report helpfully set out a vision for town centres which will act as:

- Activity-based community gathering places
- Retail is a smaller part of a wider mix

- Green space, leisure, arts/culture, health & social care services, housing
- Space for social & community interactions

2.8 The Build Back Better High Streets Paper is the Government's most recent strategy, building on the 2019 vision but also considering how high streets and town centres can adapt and thrive after the COVID-19 pandemic. The plan sets out five key priorities to achieve the vision of having "vibrant high streets where communities are at the heart of place-making; where a mix of commercial and residential uses complement each other; and where businesses large and small feel welcome." The plan does not provide any major new policy steer or resources to support high streets.

The five priorities are:

Breathing new life into empty buildings;

- Planning flexibilities around change of use; enabling vacant commercial premises to be demolished and a new development right to convert empty shops, restaurants and offices into homes.
- £150m community ownership fund to enable communities to take over local community assets such as pubs, theatres and post offices.
- Encouraging councils to use Compulsory Purchase Orders for more effective land assembly to facilitate growth.
- Intention to reform legislative framework to ensure local areas have access to delivery vehicles to support growth and regeneration.

Supporting High Street businesses;

- Commitment in principle to make temporary pavement licence measures permanent.
- 12 month extension to temporary permissions for off-sales alcohol
- Legislation to ring-fence debt that has been accrued from March 2020 for tenants who have been impacted by covid-19 business closure
- Working with BIDs to improve stakeholder engagement
- Hospitality-led regeneration hubs, with demonstrators
- Green guide for SME retailers

Improving the public realm;

- Focus on accessible and green infrastructure
- Manual for Streets to be published in 2022
- Government to choose 12 non-London local authorities for intensive investment in mini-Holland cycle schemes
- Local transport authorities being asked to produce Bus Service Improvement Plans by the end of October

Creating safe and clean spaces;

- Litter bin grant scheme
- Increased enforcement on litter, graffiti and gum.
- New delivery model for probation service focussed on visible community pay back.

Celebrating pride in local communities.

- Cultural Investment Fund
- Transforming Places Through Heritage programme

- Office for Place to be established by MHCLG focussed on design quality within the planning system.
- Local celebrations to be led by local authorities to engage communities and local high streets.

2.9 Most of the resources to deliver the 'place' centred actions above will come from existing announcements including Future High Streets Fund, Welcome Back Fund, Community Ownership Fund, Town Deals and the forthcoming Levelling Up Fund and Community Renewal Fund.

2.10 There is a suggestion that further relaxations of guidance on change of use and more encouragement of Local Authorities to use Compulsory Purchase powers for persistently derelict buildings or to progress stalled regeneration schemes will be introduced. Undertaking physical regeneration and site assembly in town and city centres has frequently been a cost prohibitive issue for many Local Authorities – especially if the final uses of any regeneration have lower end use classes and land values than the previous retail use.

Use Classes Order Changes

2.11 Complementing the Governments approach to transforming town centres, in recent years there have been changes to the classifications of certain use categories, and the scope for changing use, which is relevant to this report. The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757), which were made on 20 July 2020 and took effect on 1 September 2020, made important changes to the already much amended 1987 Use Classes Order. In summary the Regulations introduced three new use classes:

- Class E (Commercial, business and service) – including retail, restaurant, office, financial/professional services, indoor sports, medical and nursery uses along with "any other services which it is appropriate to provide in a commercial, business or service locality";
- Class F.1 (Learning and non-residential institutions) – including non-residential educational uses, and use as a museum, art gallery, library, public hall, religious institution or law court; and
- Class F.2 (Local community) – including use as a shop of no more than 280 sqm mostly selling essential goods, including food and at least 1km from another similar shop, and use as a community hall, area for outdoor sport, swimming pool or skating rink.

2.12 Parts A and D of the original Schedule to the Use Classes Order have been entirely deleted, with Use Classes A1, A2, A3, parts of D1 and D2 subsumed into new Use Class E along with Class B1.

2.13 Changes of use within this new Class E will not constitute development and will not require planning permission. This new flexibility is not linked to spatial considerations and therefore will apply both to high streets and all town centre uses located outside of centres. The government has said that the main driver of change has been the need to enable a repurposing of buildings on high streets and town centres. The new Class E allows for a mix of uses to reflect changing retail requirements. It will allow a building to be used flexibly by having several uses taking place concurrently or by allowing different uses to take place at different times of the day. The Government will also allow commercial buildings within the Class E use to be converted into homes via prior approval. Under the new permitted development right, local authorities will only be able to refuse applications on limited grounds including flooding risk, noise pollution and inadequate natural light. Homes produced will have to meet national space standards.

The right will be available on premises of less than 1,500sq m in size, and only for premises that have been vacant for three months prior to the date of applications. Buildings must have been in the E use class for 2 years. In addition, whilst there is additional protection for conservation areas, the permitted development right will still apply in these areas. There will also be additional criteria to assess the loss of health centres and nurseries.

2.14 The new concept of 'Local Community' uses – Class F2 – has been introduced to ensure important community facilities are protected through the planning system. Again, changes of use within this class do not require planning permission. Certain uses have now become sui generis uses, with the effect that no changes of use to or from these uses fall within permitted development. These include pub/drinking establishment (A4), hot food takeaway (A5), venue for live music (D2), cinema (D2(a)), concert hall (D2(b)) and bingo hall (D2(c)).

3 East Devon Current Position

3.1 Based on size, population and shopping facilities, East Devon has eight towns:

- Axminster;
- Budleigh Salterton;
- Cranbrook;
- Exmouth;
- Ottery St Mary;
- Honiton;
- Seaton; and
- Sidmouth

Which are assessed in this report, along with the small town/large village of Colyton and the village of Beer which both have an extensive range of shops for their size. The Local Plan establishes a hierarchy of settlements based on their role and function- tiers one and two comprise settlements with a range of shopping facilities but not all of the tier 3 and 4 villages contain a range of shops and those that don’t are not the focus of this report.

3.2 Each of these towns supports a town centre (although at Cranbrook the planned centre is not yet fully established). Colyton is the smallest of the East Devon towns (it could be considered a large village) and it has the least facilities of the centres listed. The village of Beer, although slightly smaller than Colyton, actually supports more shops, with a number of these most likely to be viable on account of the busy tourist trade.

3.3 With the exception of Cranbrook, (and to a lesser degree Colyton and Budleigh Salterton) the town centres of East Devon provide facilities to meet most of the everyday needs of the resident populations of those towns and of surrounding rural hinterlands. A range of shops are found in these centres along with supermarkets and a diverse selection of social and community facilities. Independent shops are comparatively common in East Devon towns. For much larger sized shops and a bigger selection, as well as major recreational and cultural venues and such destinations as major sporting facilities, residents of East Devon would need to leave the District (2019 Avison Young study (Retail Assessment)). Link to the East Devon Website to be added once the evidence is uploaded

3.4 As identified by the Government nationally, the role and function of East Devon’s town centres is shifting away from retail uses. The last ten years has seen the decline of traditional shops selling comparison goods as these products can often be bought more conveniently online – bulky white goods, electronics, books and increasingly, fashion and footwear. Nationally town centre footfall has reduced by about 30% in the past 10 years as shoppers increasingly view items in physical shops but purchase through the internet. This can be quick and convenient, but it reduces the viability of physical shops and in turn reduces the availability of goods and services to those without the internet, without electronic banking or without the means to access alternative out-of-town shops.

3.5 Whilst East Devon's High Streets are still relatively vibrant (there are fewer vacant units and more independent shops than the national average 10.3 %- (High Streets and Town Centres 2030 report https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/report-summary.html) the traditional anchor town centre uses such as banks, clothing shops and pubs have closed many outlets. Where vacant shops have been taken over, they are often filled by cafes and coffee shops and health and beauty businesses – nail salons, hairdressers, tattoo parlours and barbers – all offering experiences rather than products. Higher numbers of vacant units and new uses with 'blank' frontages or visits by appointment are unattractive to shoppers and reduce the interest and bustle generated by diverse window displays enticing passers-by, although by-appointment businesses can be an excellent way to bring upper floors into use.

3.6 Currently, the adopted Local Plan Policy E9 Town Centre Vitality and Shopping Areas provides the overarching policy relating to retail provision in the current defined town centres, Policy E10 establishes Primary Shopping Frontages (within which permission will not normally be granted for the change of use of ground floor premises from retail to non-retail uses unless it can be demonstrated that this would not be harmful to the existing character or primary shopping function of the area) and Policy E11 requires a sequential approach to be taken to ensure that town centres remain the preferred location for new retail development. Other policies address smaller, neighbourhood centre shops, rural retail and loss of village shops and services.

3.7 Policy in the adopted Local Plan aims to ensure that changes of use within the shopping frontages of town centres take place without undermining their retail function. The policy recognises that space in shopping frontages can usefully be taken up by non-retail uses. Such uses can add to the variety, attractiveness and economic activity of the centre, but only so long as they do not concentrate within the primary shopping area so that the retail character of the immediate area is not undermined and does not deter the movement of shoppers in a particular direction within the centre.

Issues and Options Consultation Spring 2021

3.8 To inform the new Local Plan, an Issues and Options consultation was undertaken in January 2021. The Council explored through consultation • How we might promote greater use of vacant upper storeys above ground floor shops. • Whether we should seek to resist out-of-town retail, or other commercial activities, in the hope that we may see more town centre shopping and investment. • Whilst it would probably be outside of the scope of local plan policy we could look to producing masterplans for town centres to identify key areas for improvement. • Any other comments on additional town centre policy objectives

3.9 The responses are listed at Appendix 1, but in summary, most respondents favoured mixed commercial uses in town centres, with over half of respondents supporting leisure or community uses and very little opposition to these. Dominant retail use (as has traditionally been promoted by policy) received around 30% support and a similar level of opposition. In the written comments the use of upper floors for services, community activities and housing were strongly supported and a range of measures suggested to encourage this. A significant proportion of respondents (around 20%) were opposed to change of use to housing, although this also received considerable (quantified) support.

In the written comments most concern related to the permanent loss of retail units to housing and the consequential impact on the retail function of the town centres. Edge-of-centre and first floor residential uses received considerable support. The need for town centres to be vibrant social spaces was expressed by many respondents. A range of activities, areas to sit and increased community, health and service uses were seen as a major draw.

3.10 In addition, respondents were invited to comment on additional town centre policy objectives. Three additional areas were suggested where policies may be appropriate, including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement, and respondents were encouraged to add their own views. Two thirds of respondents agreed with the suggested policy areas. A significant number of other suggestions related to management and financial matters that are not within the remit of the Local Plan.

3.11 Following this consultation, Members considered a report which set out the proposed policy approach to be taken in the emerging Local Plan along with reasonable alternative approaches. The draft Plan was informed by this debate. Agenda item - Working draft of the proposed East Devon Local Plan 2020 - 2040 - East Devon

Draft Local Plan Consultation Winter 2022

3.12 A draft Local Plan was consulted on from November 2022 to January 23. This included "Strategic Policy 56- Town Centre hierarchy, sequential approach and impact assessment" and "Policy 57- Town Centre development".

3.13 Policy 56 is a strategic policy because it establishes the network and hierarchy of centres. Maintaining the vitality and viability of the town centres in East Devon is a strategic priority in the plan. This policy is also the starting point for the suite of non-strategic policies on town centres and primary shopping frontages, local shops and services, and rural shops. This policy draws on the evidence in the Council's Role and Functions of Settlements Study produced by the Council in July 2021, which categorised the roles of existing settlements in the District by taking into account their differing sizes, offer, functions and accessibility by sustainable transport modes. The Role and Function of Settlement Study was reported to Strategic Planning Committee of the Council on 5 October 2021, see item 38 - 1a. 1a. Role and Function of Settlements report v3 final draft for SPC.pdf (eastdevon.gov.uk) In addition to the town's identified in tier one and tier two, the smaller settlements of Budleigh Salterton, Beer and Colyton contain a similar range of shops and other uses typically found in the larger towns, albeit at a smaller scale, and so Policy 56 also applies to them.

3.14 Policy 57 takes a positive approach to the growth, management and adaptation of the town centres. As part of a positive strategy for the future of each town centre, the Local Plan defines their extent and makes clear the range of uses that are acceptable within them.

3.15 This consultation referred to the Town Centre area and Primary Shopping Area (which in most cases are one and the same due to the compact nature and concentration of retail uses) but did not show the boundaries on the Policies Map. The boundaries will be subject to a further consultation in Spring 2024.

3.16 It should be noted that the criteria-based policy relating to Primary Shopping Frontages (E10) in the adopted Local Plan was reviewed and considered to be out of date given the change of use now allowed by permitted development rights. The Council has taken on board the consultation responses received during the consultation which stressed the importance of keeping frontages up to date, the need for a policy approach that sought to retain a certain proportion of retail uses in the town centres and concerns that historic features will be lost during conversion and has addressed these matters through other policies.

3.17 The summary of feedback received in respect of the Draft Local Plan Policies 56 and 57 is attached at Appendix 2. Briefly, most respondents were neutral or broadly supportive of the policy approach and comments tended to focus on specific towns. There was concern that town centre retail uses could diminish, particularly if housing is encouraged, and that notable features (such as signage, doorsteps and shopfronts) should be retained. Various suggestions for town centre improvements were suggested. Several respondents were concerned about the potential impact of out of centre retail development and/or how it could be accessed sustainably but the lower, 500m, threshold for retail impact assessments was not challenged and neither was the default threshold, 2500m, for other types of development. Overall, no major wording changes were necessary as a result of the feedback.

Consultation Spring 2024

3.18 To be completed after the consultation

Evidence Base

3.19 The existing and emerging retail and town centre evidence base that will support the preparation of the East Devon Local Plan is depicted in Table 3. These studies were commissioned by the Greater Exeter Strategic Partnership (GESP) to assist in local plan preparation.

Table 3- Evidence Base documents (* links to be added when they are available on the EDDC website)

Evidence	Date	Comments
Town Centre Assessments	September 2022	These were undertaken in house. They form part of this report
Greater Exeter Town Centre and Retail Study- Part 2 Retail Needs Assessment and Retail Strategy (Avison Young) *	December 2019	Jointly commissioned with Mid Devon DC, Teignbridge DC, Exeter CC and Devon CC
Greater Exeter Town Centre and Retail Study- Part 1 (GVA) *	September 2017- published 2018	Jointly commissioned with Mid Devon DC, Teignbridge DC, Exeter CC and Devon CC
Sequential Test Impact Assessment Threshold Justification	December 2023	This was undertaken in house. It forms Appendix 4 to this report

Sequential Test

3.20 In accordance with paragraph 87 of the NPPF, the Council must apply a sequential test to planning applications for new retail and retail related development, for example drive-through restaurants or retail warehouses. The sequential approach will be applied so that main town centre uses are located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) will out of centre sites be considered provided that they can be made accessible by a choice of means of transport and will not adversely impact upon nearby centres.

3.21 It is recognised that existing out of town stores will continue to provide a form of retailing which both adds to local shopping choice and is popular with the public. Proposals for the refurbishment and redevelopment with small scale extensions of out of centre stores may be acceptable where there is insufficient net gain in retail floorspace to have an adverse effect on other established centres. Sequential testing is not required for small scale rural development (including office development).

3.22 The NPPF sets a default threshold of 2500m^2 for requiring an impact assessment unless a proportionate, locally set floorspace threshold is adopted. Above this threshold planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan should be assessed for their impact. The scope of the Sequential Test and Impact Assessment required to be submitted in support of a planning application should be discussed and agreed between the applicant and the Council at an early stage in the pre-application process. It should include assessment of:

(a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

(b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on these considerations it be refused.

3.23 The level of detail included within the assessments must be proportionate to the scale and type of retail floorspace proposed and shall be determined on a case by case basis. In determining the scale at which impact assessments are required the Council have established a threshold figure of 500 square metres above which assessment will be needed (see Appendix 3 for justification). The default threshold of 2500 square metres will apply to other types of development.

4 Town Centre and Primary Shopping Area Assessments

4.1 In September 2022, the Council undertook a town centre and retail survey. This was an observational survey that recorded the Use Classes within, and adjacent to, the settlements identified in Policy 57 (Town Centre Development) of the Draft Local Plan.

Town	**Tier**
Exmouth	One- Principal Centre
Axminster	Two- Main Centre
Cranbrook	Two- Main Centre
Honiton	Two- Main Centre
Ottery St Mary	Two- Main centre
Seaton	Two- Main Centre
Sidmouth	Two- Main centre
Budleigh Salterton	Three- Local Centre
Colyton	Three- Local Centre
Beer	Four- Service Village

4.2 In accordance with the methodology at Appendix 3 a visual survey was carried out on all the ground floor units within the town centre area (as defined in the adopted Local Plan) and any business units just outside these boundaries. We also visually surveyed any residential property in line with the NPPF which recognises the importance of residential space within town centre and retail areas. In addition, the locations of train stations, car parks and bus stops have been identified, as these can contribute to the vitality and sustainability of the town centre and retail areas.

4.3 The previous Town Centre Survey was undertaken in 2012 by the Council. The range of uses has been expanded in the most recent survey. The importance of residential units and leisure use to the high street is highlighted in the NPPF, so these (and allied) uses are now recorded. As a result of this, direct comparisons between the 2012 and 2022 surveys cannot be made. Although the range of uses has been widened it was necessary to group some uses (such as community uses) together where they may draw visitors to use the town centre in a way that generates vitality even if users are not spending money. Libraries and Dr surgeries are examples that will not generate spending in themselves but will add to town centre vitality and viability. Visiting a library or surgery will often form part of linked trips with visiting shops and other town centre attractions/facilities.

March 2012 survey:

- A1 – shops with charity shops forming a sub-category (this included uses such as hairdressers and opticians);
- A2 – Professional and financial services;
- A3 – Restaurants and cafes;
- A4 – Pubs;
- A5 – Takeaways
- Vacant units; and
- Other .

September 2022 survey:

- Shops with charity shops forming a sub-category
- Service uses such as hairdressers, opticians, nail bars and other ‘experiences’
- Professional and financial services
- Restaurants and cafes
- Pubs

- Takeaways
- Residential
- Leisure
- Community/health/day nurseries
- Vacant units; and
- Other

4.4 The draft East Devon Local Plan of 2024 includes two site specific retail policies:
• **56. Strategic Policy – Town centre hierarchy, sequential approach and impact assessment** and
• **57. Strategic Policy - Town Centre development**
Which relate to defined Town Centre Areas and Primary Shopping Areas

4.5 The first of these policies establishes the principle for accommodating retail and commercial development in town centre areas and the second specifically seeks to encourage uses that would improve the quality and/or broaden the range of retail and leisure facilities, enhance the role of the town centres as sustainable shopping and leisure destinations and strengthen their vitality and viability whilst resisting proposals which would undermine the shopping character or visual amenity of the town centre. The policies refer to defined areas but at the time of the draft consultation (winter 2022) the relevant areas to which policy was proposed to apply were not defined in the plan document and so these are subject to consultation in 2024. This paper is concerned with policy boundaries. For the actual proposed wording of policy the draft Local Plan should be referred to, see: Have Your Say Today - 09 Supporting jobs, the economy and vibrant town centres - East Devon Local Plan (commonplace.is). It should be noted that policy wording may be refined in readiness for plan submission. Any policy wording refinement will be undertaken outside of this paper.

4.6 Defining policy and areas to promote retail activity and protect town centre areas is critical because in the absence of such policies investment in commercial activity could be dispersed widely inside and outside towns. Dispersed patterns of investment/activity could undermine the key functional importance of town centres and their relationships with the surrounding area, such as being nodal points for public transport systems, acting as a draw for tourism and providing for linked trips to multiple outlets. Many land uses can be more valuable to property owners than retail use. There can, therefore, be pressure to convert retail and other commercial buildings to another non-commercial use. Whilst this may be financially beneficial for a property owner it can erode and undermine the commercial vitality and viability of town centre areas and as a consequence have very much more significant and wider adverse economic and social impacts. For this reason it is essential that the role of town centres as sustainable shopping and leisure destinations is strengthened and protected.

4.7 **Town Centre Areas**
The policy approach advocated is one of defining Town Centre Areas to encompass broad central areas in towns where there is existing retail and commercial activity and potential to accommodate more activity. Town Centres provide a wide range of services and fulfil a variety of functions that need to be accessible to a large number of people from all sectors of the community. In addition to retail shops, East Devon town centres provide business opportunities, health services, housing, educational opportunities, public transport, leisure and entertainment facilities, tourist attractions and a diversity of other uses which contribute to vitality and viability. Different, but complementary uses, during the day and in the evening, can reinforce each other making town centres more attractive to local residents, shoppers and visitors. Uses such as leisure and entertainment facilities, museums and libraries, hotels, street markets, restaurants, pubs and cafes all add variety. Occupation of flats above shops and in vacant units can increase activity, and therefore personal safety, and ensure that buildings are kept in good repair.

4.8 The approach is one of town centres being of a size that ensures that they are large enough to provide flexibility and scope for more activity but without being so large that they could lead to dispersal of commercial activity into separate unconnected pockets or zones. Ease of physical movement and connectivity is seen as critical, therefore defined shopping areas cover areas that are comfortable to walk around and across for reasonably active people.

4.9 Primary Shopping Areas are the areas within the town centre where most retail activity is concentrated. Ensuring that a range of shops and leisure uses are available and are in close proximity will enable visitors to make linked trips. Other uses, including residential, that would undermine the shopping and leisure function of the Primary Shopping Areas will be resisted as non-active use and 'blank' frontages will lessen the offer and appeal to visitors. In most cases the town centres are relatively compact and are focussed around the concentration of retail/leisure uses. In these cases, the Town Centre Areas and Primary Shopping Areas will be the same and the boundaries will be concurrent. In the cases of Seaton and Exmouth the town centres extend further and uses are more dispersed- there are concentrations of leisure/retail which are identified as Primary Shopping Areas but other, intervening, town centre uses are excluded from these areas. The Town Centre and Primary Shopping Areas are not concurrent and are drawn separately in these towns.

4.9 The sections that follow show the results of the retail survey work for each town centre on one map and then, on a second map, the proposed policy boundaries. The maps are supported with brief associated commentary about each town.

4.10 It should be noted that it is the street frontage that was surveyed and that is the critical component of the survey work. For ease of mapping Ordinance Survey defined building plots/blocks have been coloured in. The colouring in of plots/blocks does not indicate that all of the coloured in area is in a given defined use or function nor that there are active frontages (eg shop windows) on all external sides of premises.

4.11 In addition to this survey work the Council also commissioned GVA Grimley/Avison Young to undertake two part town centre health check and retail study. This was completed in December 2019. The reports should be read in conjunction with this paper. See: Need to update links to East Devon website (the reports are still available at Sharepoint at the time of writing and the EDDC links are not yet available)
Evidence - Greater Exeter Strategic Plan (gesp.org.uk)
Planning websites - Town Centre and Retail Study - Part 1.pdf - All Documents (sharepoint.com)
Planning websites - Retail Needs Assessment and Retail Strategy.pdf - All Documents (sharepoint.com)

Evaluation of Boundaries at Axminster

Axminster is East Devon's most easterly town and the town centre forms a focal point supporting the town's population and a large rural catchment. Axminster is a long established town with a historic street pattern and many older impressive buildings. The town centre forms a north-south through route for vehicles with congestion being identified as an issue; whilst this does put pressure on road space it does ensure passing trade. The town is served by a number of car parks.

As a market town, the centre focuses on the market square and a very busy street market continues to be held on Thursdays.

Axminster has a smaller population than most other East Devon towns and the shopping centre is proportionally smaller. Since the last survey the town has lost River Cottage Canteen, owned by a TV chef which was a major visitor draw. However, offsetting this loss, the very prominently located Trinity House has been renovated and now houses several independent shops at ground floor level and The Community Waffle House at first floor. The Community Waffle House is a thriving community business which hosts over 50 local organisations and holds regular classes, clubs and events in addition to serving food and drink.

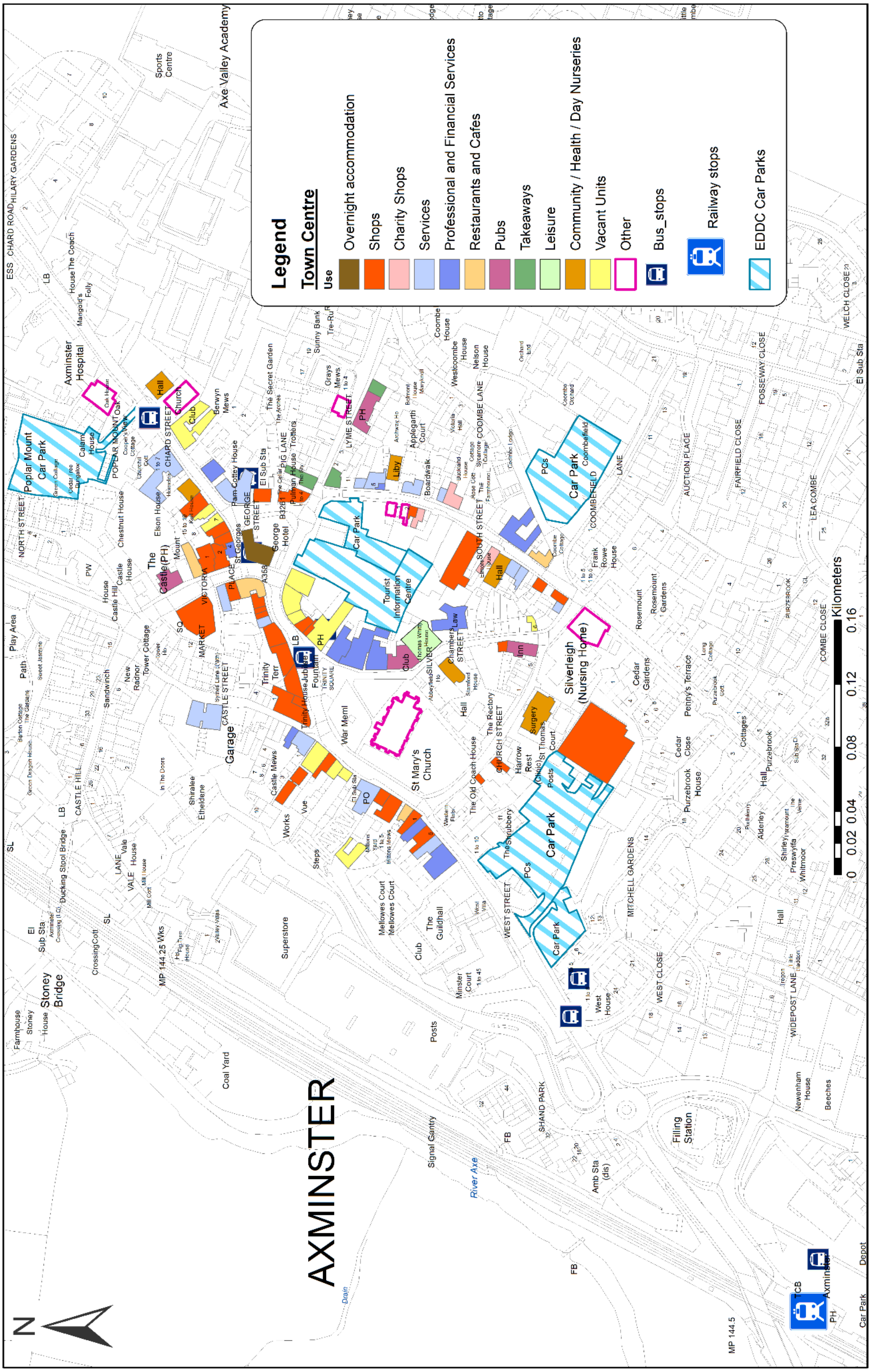
There are a wide range of independent retailers in the town but only a limited number of national chain stores. There are several charity shops in the town (large numbers of charity shops are seen as an indicator of struggling centres) and also several vacant units. Webster's Garage, the most significant vacant floorspace identified in the previous survey (vacant and derelict building) has been demolished and is now a car park which also hosts the annual fairground. Opposite Websters Garage the George Hotel has been fully refurbished since the last survey and is now a thriving public house again. Other vacant units are mostly amongst the smallest in the town and have mainly not been used for retail eg. Café, estate agency.

The former Webster's Garage site, along with possible future redevelopment of sites to the east in South Street (currently owned by the Royal Mail), offer the opportunity to provide additional shops and other ground-floor commercial uses such as cafe's which could greatly enhance the vitality of the town centre

Supermarket provision in the town is dominated by the Tesco supermarket that lies to the west of the town centre and the Co-op supermarket to the south of the town centre.

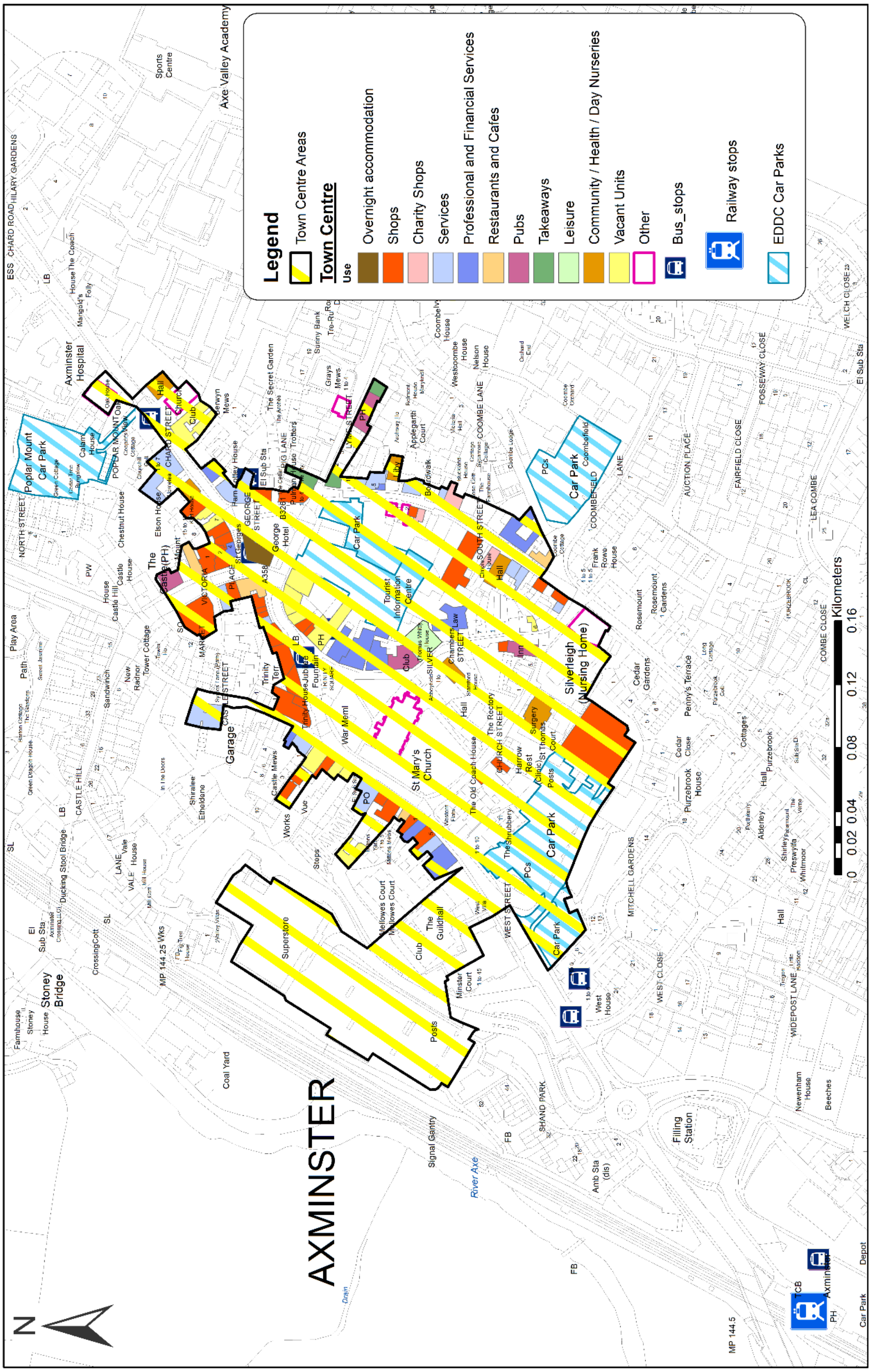
The first Axminster plan (next page) shows the survey frontage results. On the basis of the survey the second and third Axminster maps show the proposed policy boundary areas for the town.

Axminster Survey Map

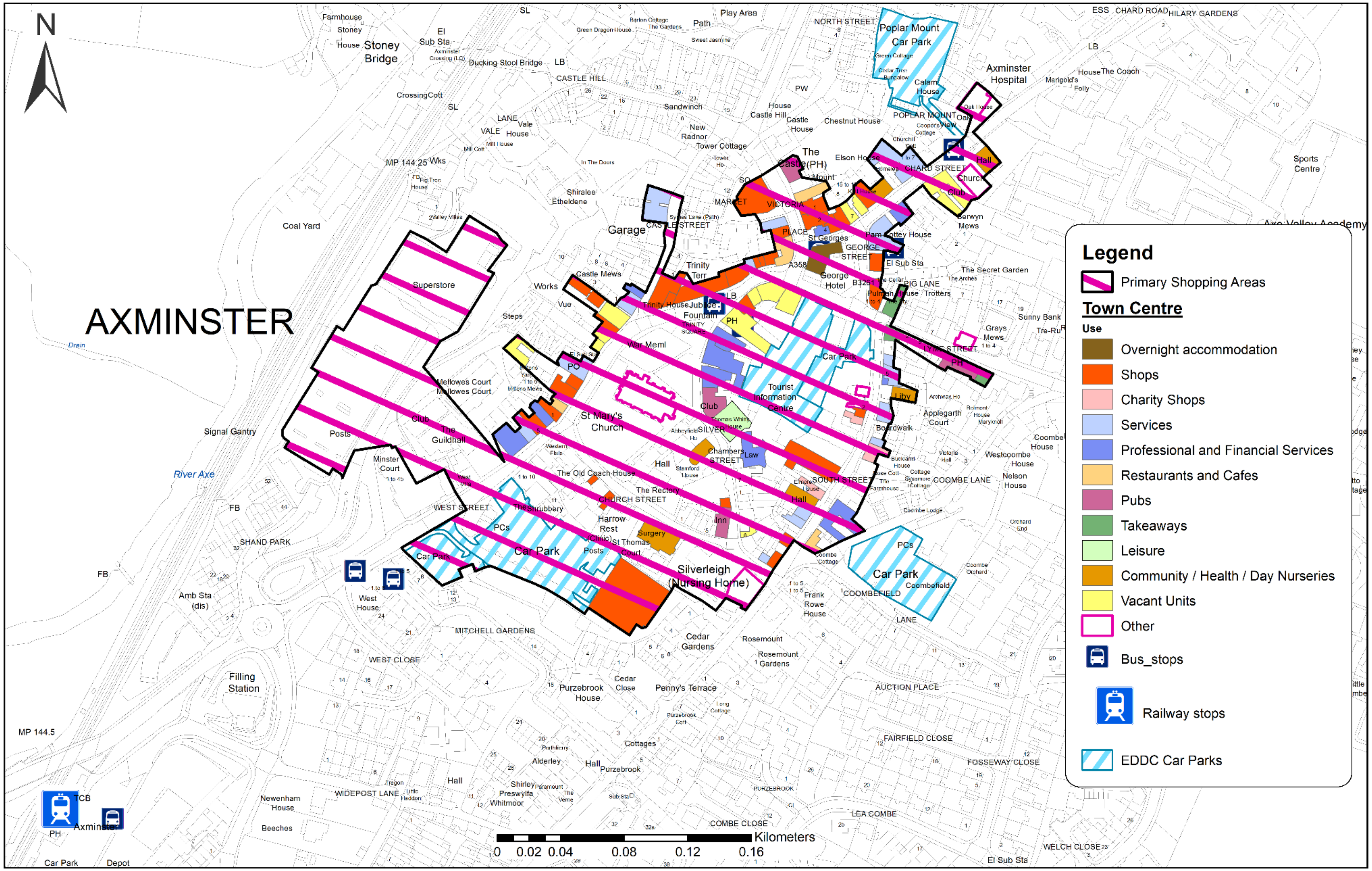


Town Centre Retail Survey
- Axminster -

Axminster Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey
- Axminster -



Town Centre Retail Survey
- Axminster -

Evaluation of Boundaries at Beer

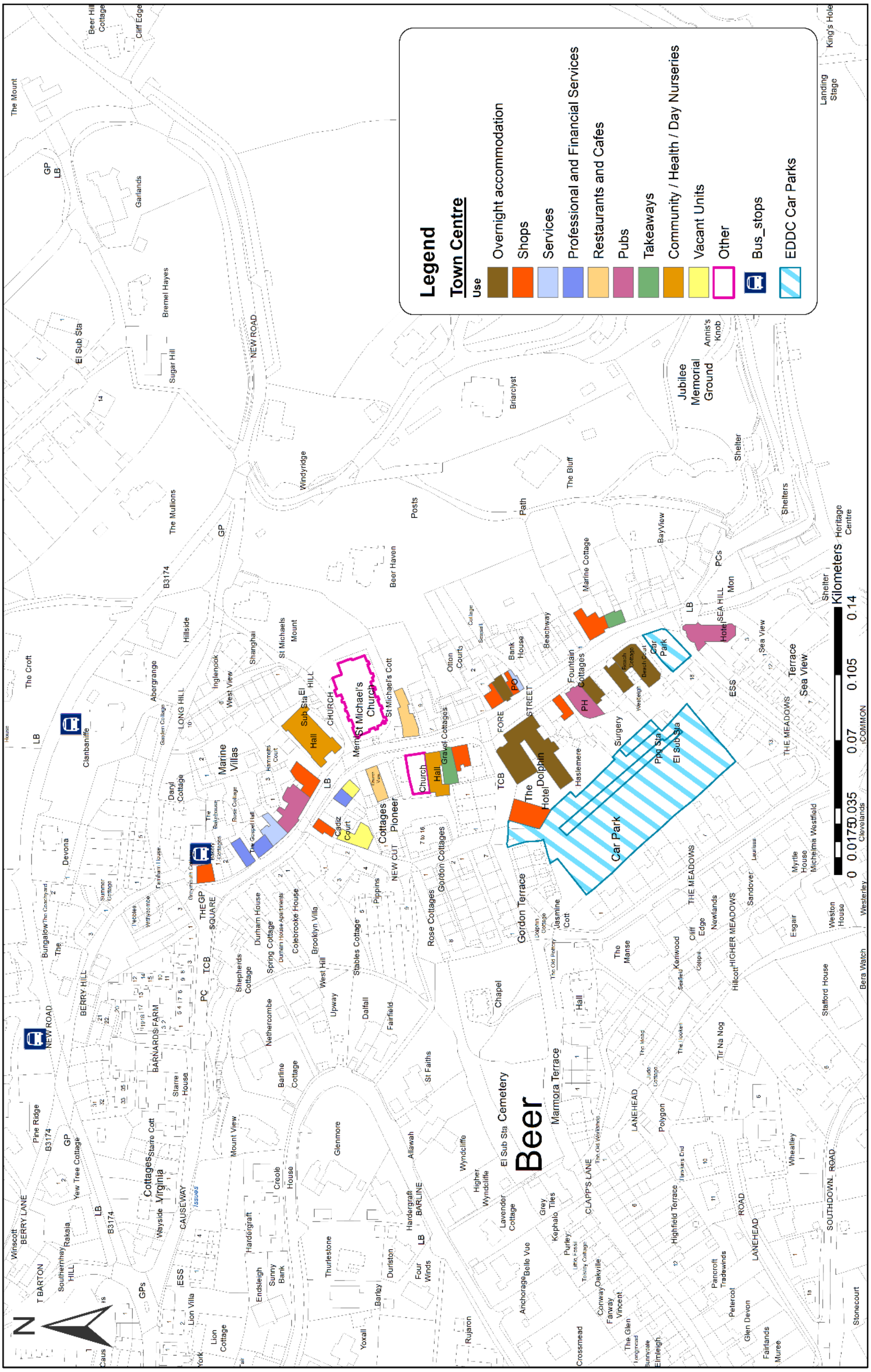
Beer is a medium sized, thriving seaside village famous for its fishing industry and very popular with tourists. It has an unusually large range of shops to meet visitor needs but also the resident population. It has a historic, dendritic (with fingers like an outstretched hand), street pattern and the High Street extends to the beach.

All of the shops and services are operated by independent retailers. Beer has a comparatively large number of café's and pubs, which will reflect demand from the resident population and also from the tourism trade. There has been some pressure to change the use of some shops to houses or holiday lets and this is a cause for concern due to the potential impact on visitor offer and the local community.

Beer does not have a supermarket or moderately sized food shop although some shops sell groceries in addition to other products. The nearest supermarkets are around 2km away in Seaton.

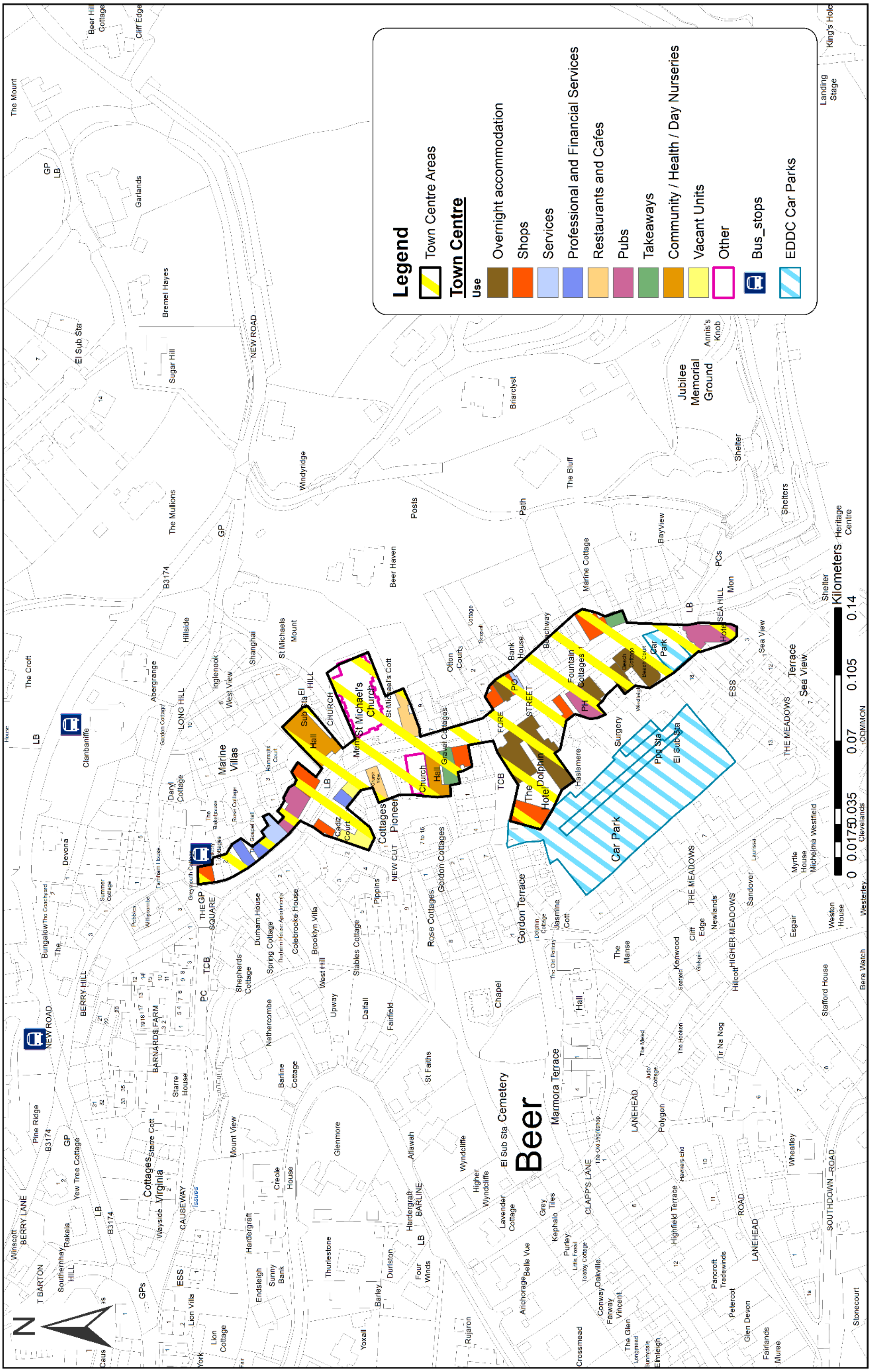
The first Beer plan shows the survey frontage results. On the basis of the survey the second and third Beer maps show the proposed policy boundary areas for the village.

Beer Retail Survey map

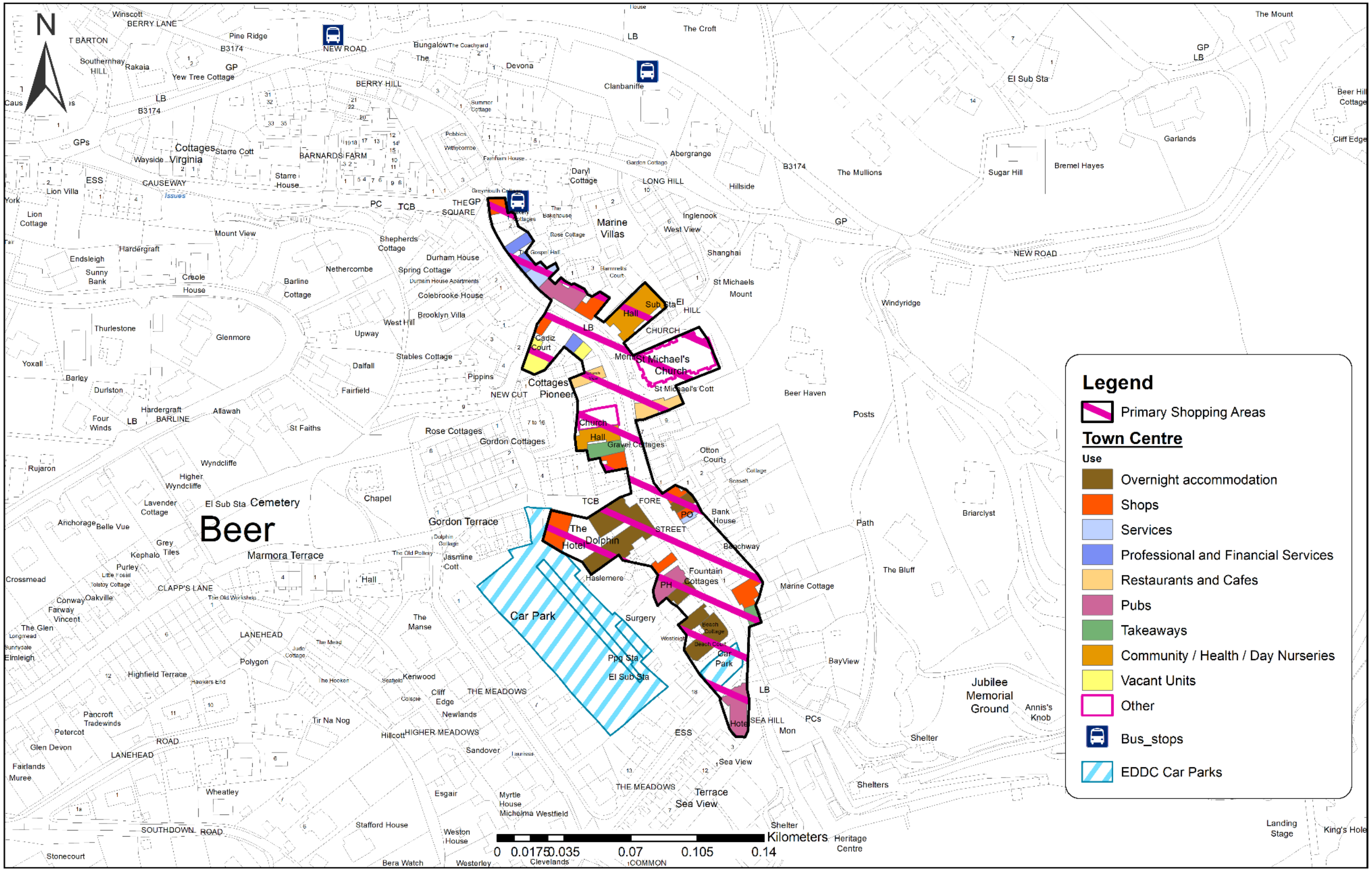


Town Centre Retail Survey
- Beer -

Beer Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey
- Beer -



Town Centre Retail Survey
- Beer -

Evaluation of Boundaries at Budleigh Salterton

Budleigh Salterton is the smallest of the East Devon towns (if Colyton is classed as a large village) and correspondingly has the smallest town centre. The main shopping street is set back from and runs parallel with the seafront beach.

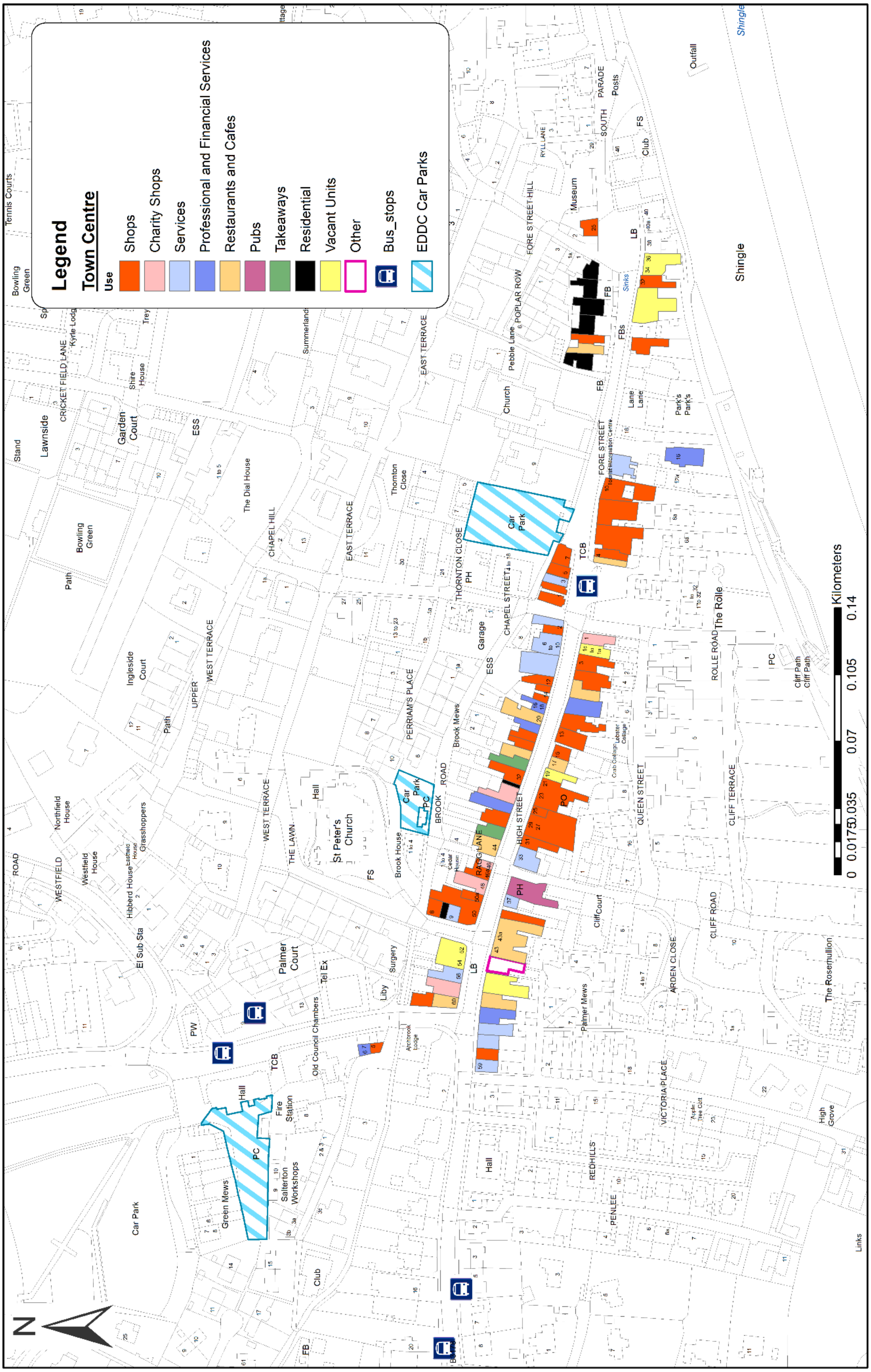
There are a wide range of independent retailers in the town but only a few national chain stores and, although there is a comparatively small number of shops, activity levels in the town are high. There are few vacant units, although the number of charity shops has increased slightly since the last survey, the town retains an air of commercial vitality.

Budleigh Salterton has a comparatively large number of café's, which will reflect demand from the resident population and also from the tourism trade.

Budleigh has moderately sized food stores but no supermarket. The nearest supermarket is located about 3 kilometres away on the Budleigh Salterton side of Exmouth. Exmouth itself offers a far more substantial range of shops than Budleigh Salterton and as such it serves residents of the town.

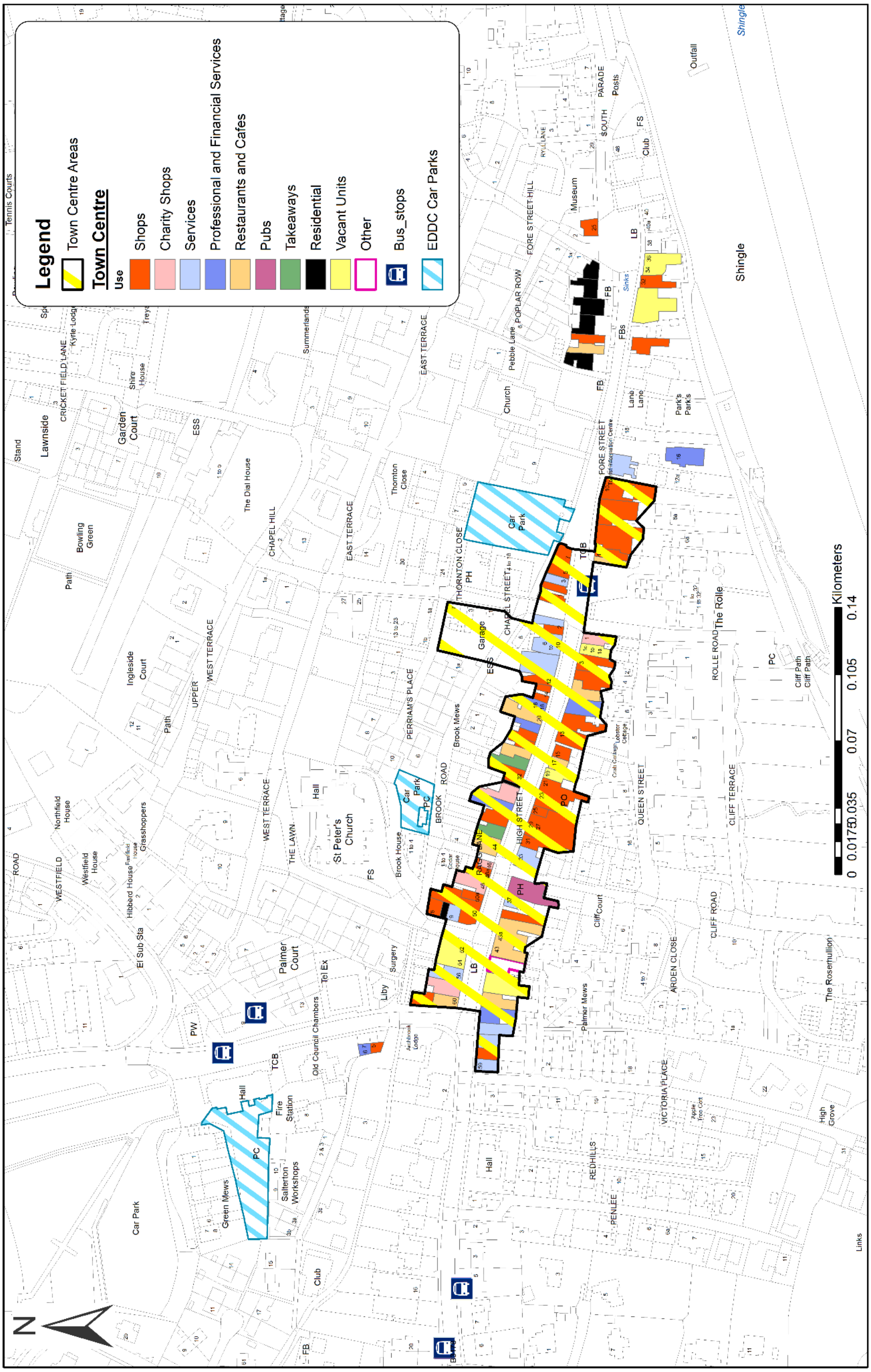
The first Budleigh Salterton plan shows the survey frontage results. On the basis of the survey the second and third maps show the proposed policy boundary areas for the town.

Budleigh Salterton Retail Survey Map

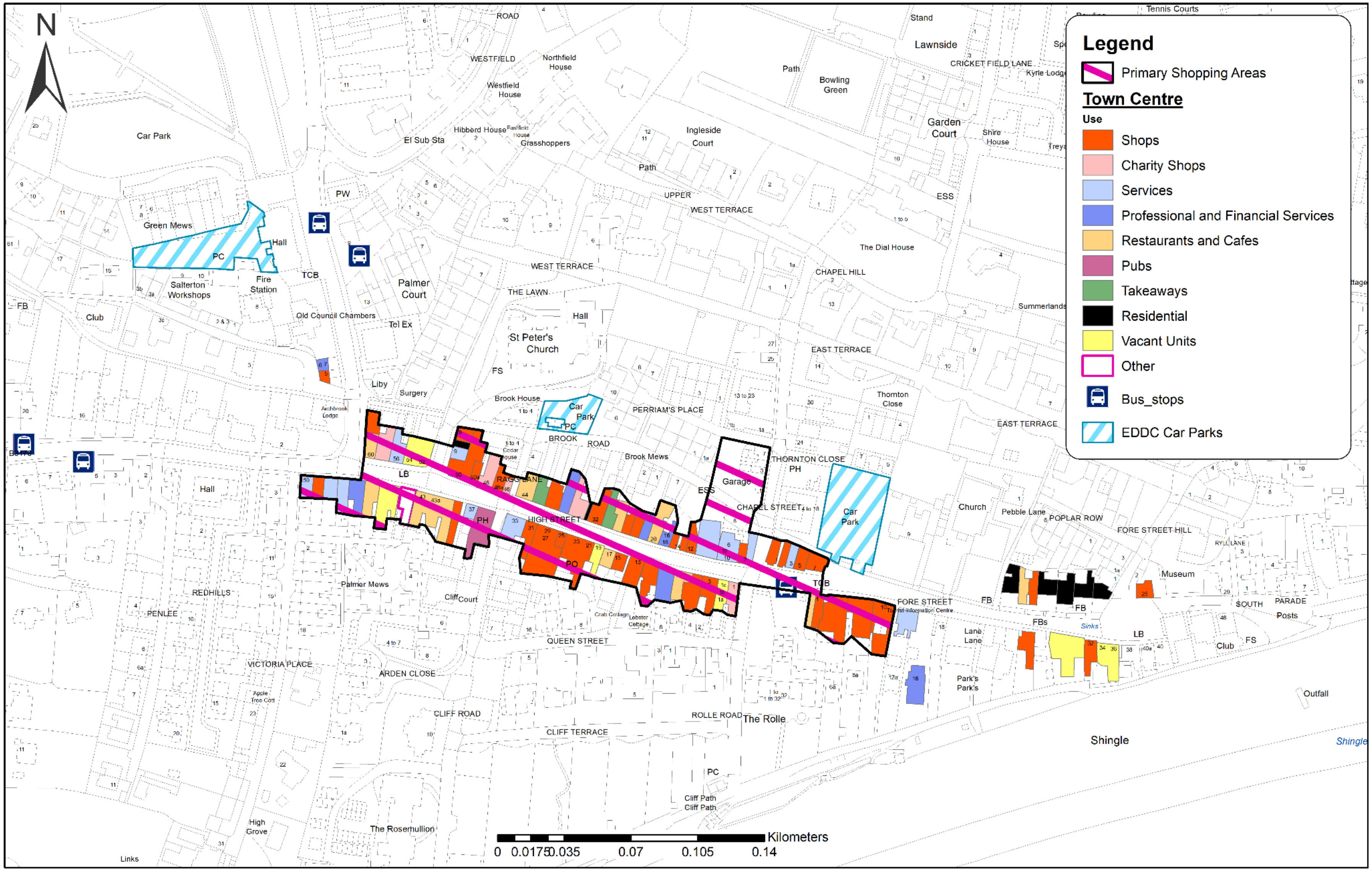


Town Centre Retail Survey
- Budleigh Salterton -

Budleigh Salterton Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey
- Budleigh Salterton -



Town Centre Retail Survey
- Budleigh Salterton -

Evaluation of Boundaries at Cranbrook

Cranbrook is East Devon's newest town and is also the town located closest to Exeter. Cranbrook has not been surveyed as the town centre is still under construction. In any case, a separate adopted Cranbrook Plan sets out the Policies which will apply in the town.

The town centre is in its infancy but it is intended that it will include retail units and apartments along the southern side of the High Street, a market square for social gathering and town events, a supermarket offering a full weekly shop and a childcare day nursery.

Outside the centre, the town already has a school, community centre with health facilities and a parade of shops, including a charity shop and small supermarket.

The population of Cranbrook is growing rapidly and, whilst it is one of the District's smaller towns at the moment it will ultimately be a medium-large town.

Evaluation of Boundaries at Colyton

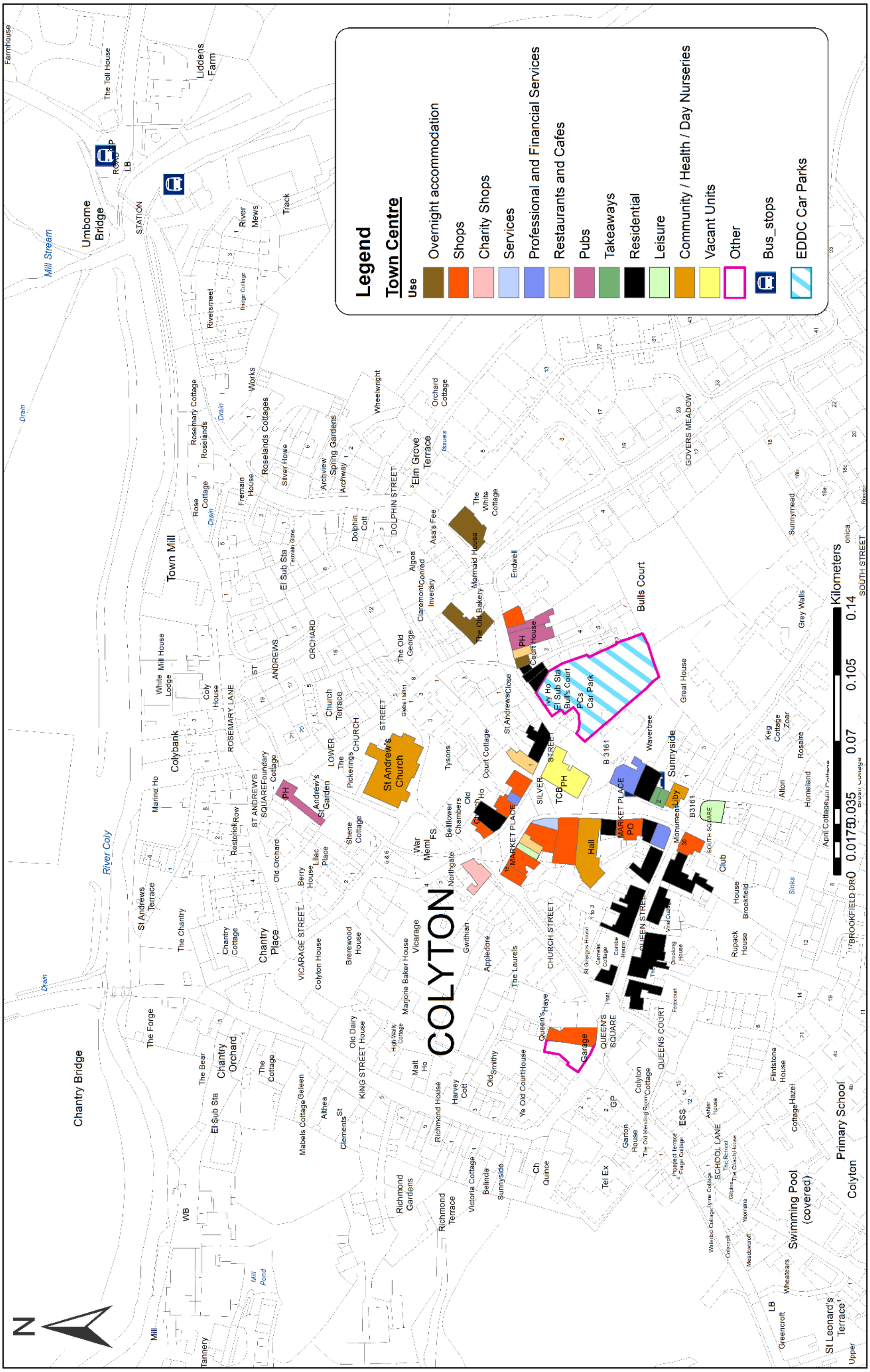
Colyton is the smallest town/largest village in East Devon and has a correspondingly small town centre. It is a long-established settlement with a medieval street pattern centring on a market place, which creates a ‘hub’ around which the majority of the retail offer lies. There are also a number of other shops and services in dispersed locations and smaller clusters in the surrounding streets.

Colyton’s shopping centre is proportionate to the local population and does not serve a wide hinterland. It is served by one main car park, with free on-street parking around the market place.

Although the number of shops and businesses is relatively small, most are independent. Overall, all of the buildings are in a good state of repair and the centre appears to be thriving, with only one charity shop (also independent) and one vacant unit at the time of surveying.

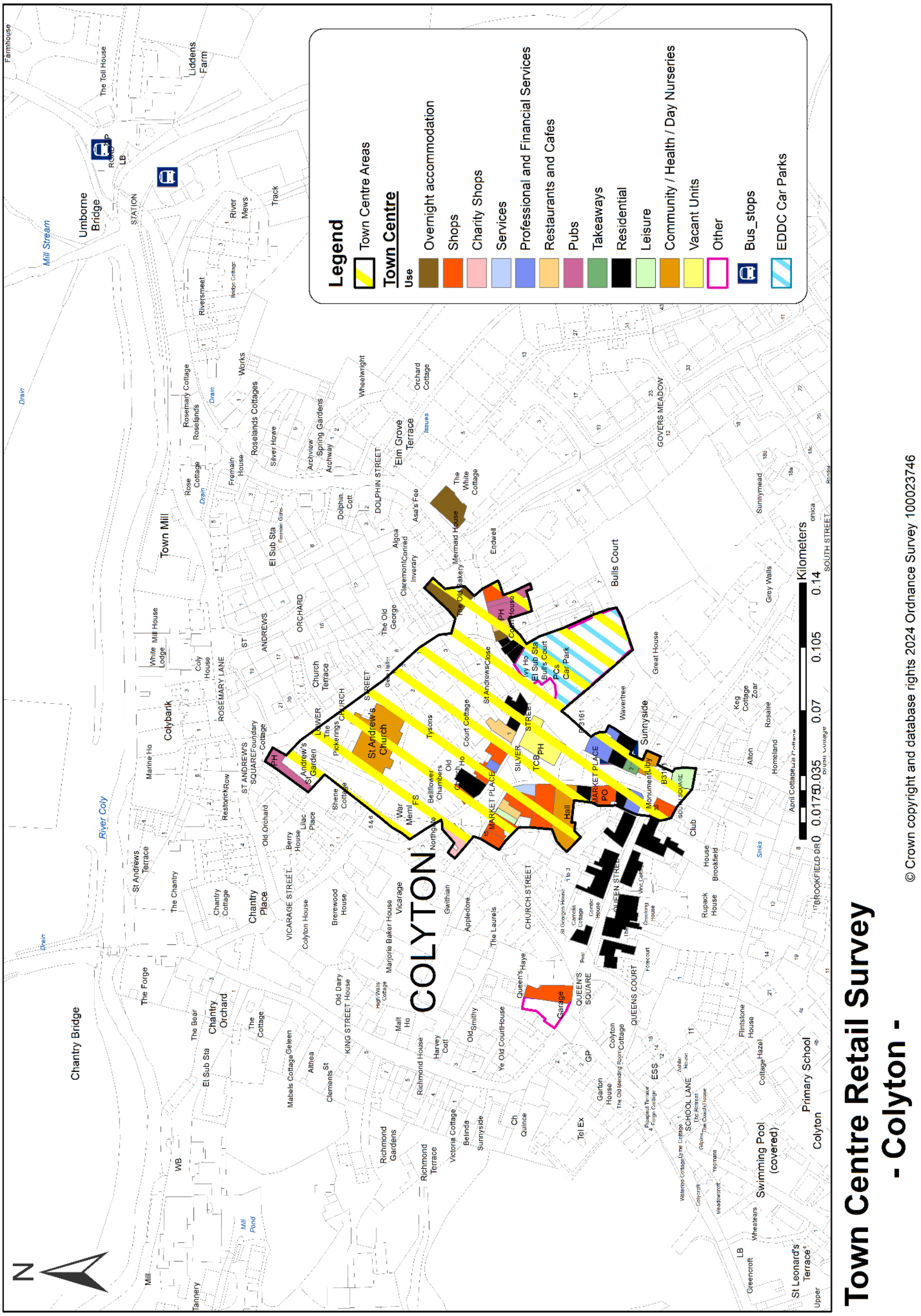
The first Colyton plan shows the survey frontage results. On the basis of the survey the second and third Colyton maps show the proposed policy boundary areas for the town.

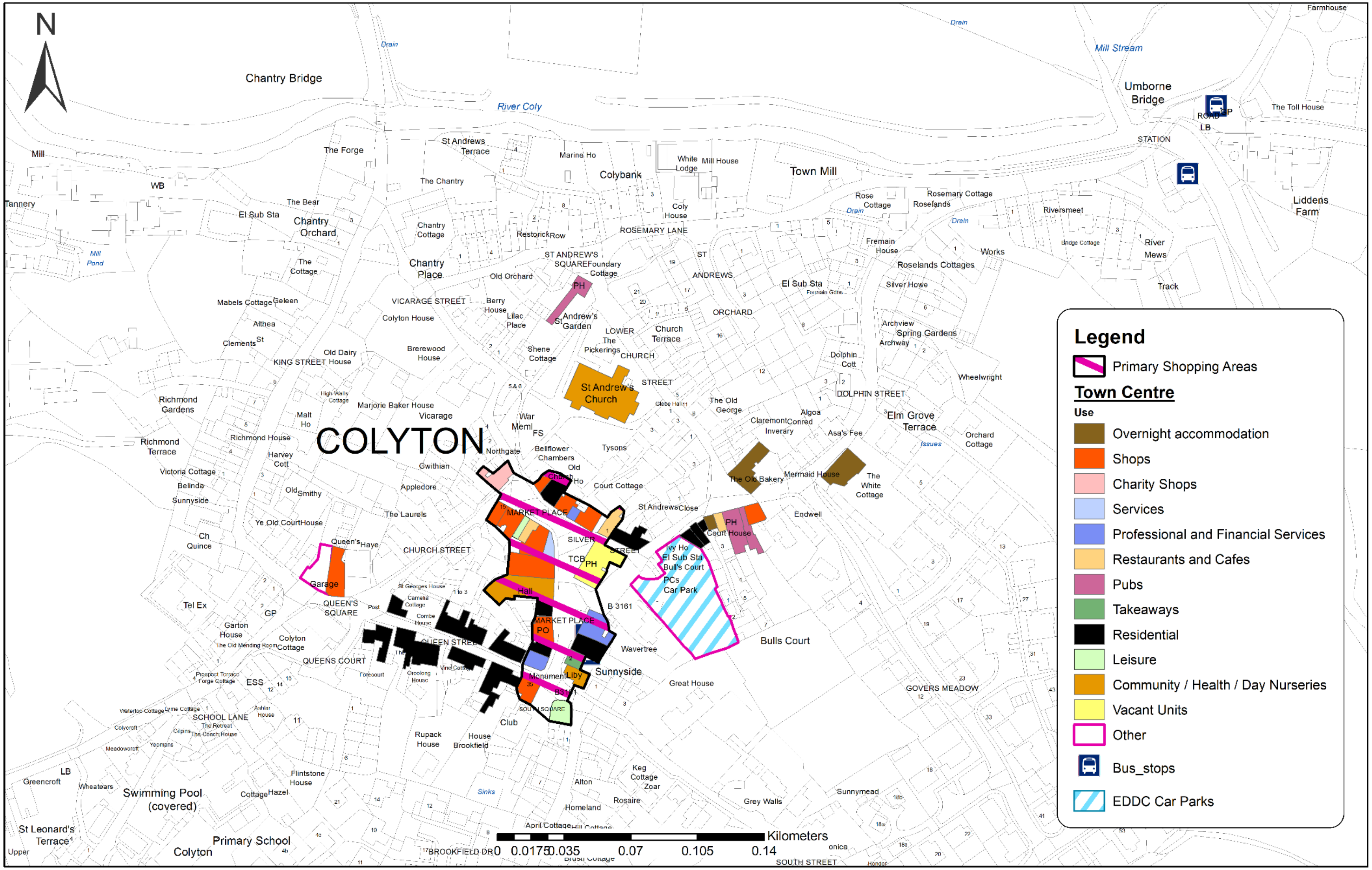
Colyton Retail survey map



Town Centre Retail Survey
- Colyton -

Colyton Proposed Town Centre Area and Primary Shopping Area Maps





Town Centre Retail Survey
- Colyton -

Evaluation of Boundaries at Exmouth

Exmouth is the largest town in East Devon and has the largest of the town centres.

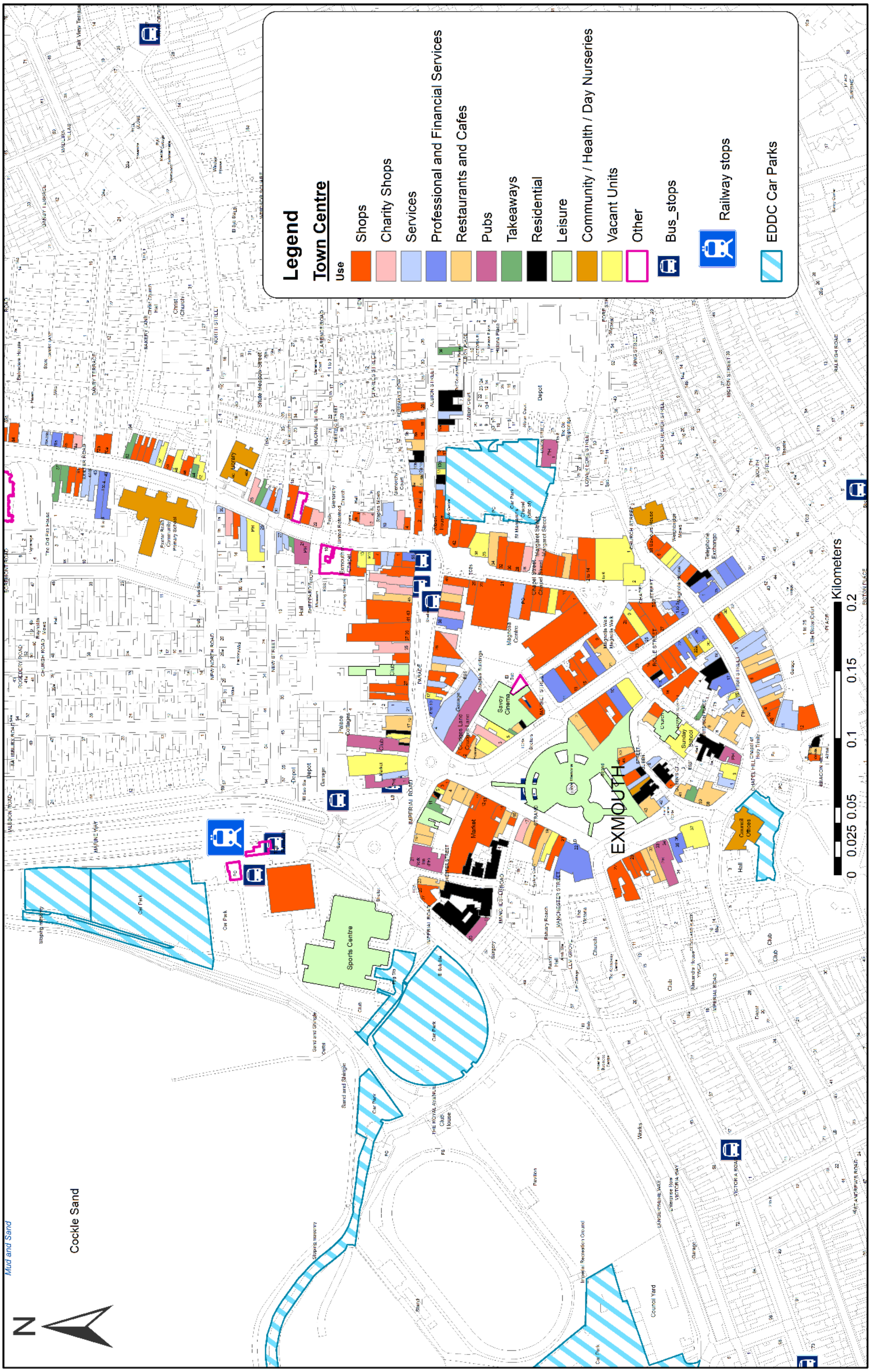
The town centre is located in the south western part of the town with residential parts of Exmouth lying up to 4 kilometres away from it. No other East Devon town centre has residential areas that lie this far from the commercial core. There is a substantial pedestrianised hub to the town, a shopping centre dating back 30 years or so (the Magnolia Centre) and a number of shopping/commercial streets. The Council owned 'Strand' is a focus for cafes and community activity and regular markets and events are held here.

There are a wide range of independent retailers in Exmouth as well as a strong presence of national chain stores, although all at smaller store format. The quality and vibrancy of the town centre varies with some parts very active and others clearly far more peripheral and struggling. There are a number of vacant units and charity shops and a high presence of cafes and take away establishments. The latter, and a number of other shops, benefit from and are tailored at serving the holiday trade.

The town centre has a medium sized supermarket, Marks and Spencer, to the south west and this has been built since the last survey. The largest supermarket serving the town, a Tesco, lies around 3 kilometres to the east of the town centre. Also on this eastern edge of the town are a number of shops and trade outlets in a business/retail park (the largest being The Range) and, close by, a Lidl store.

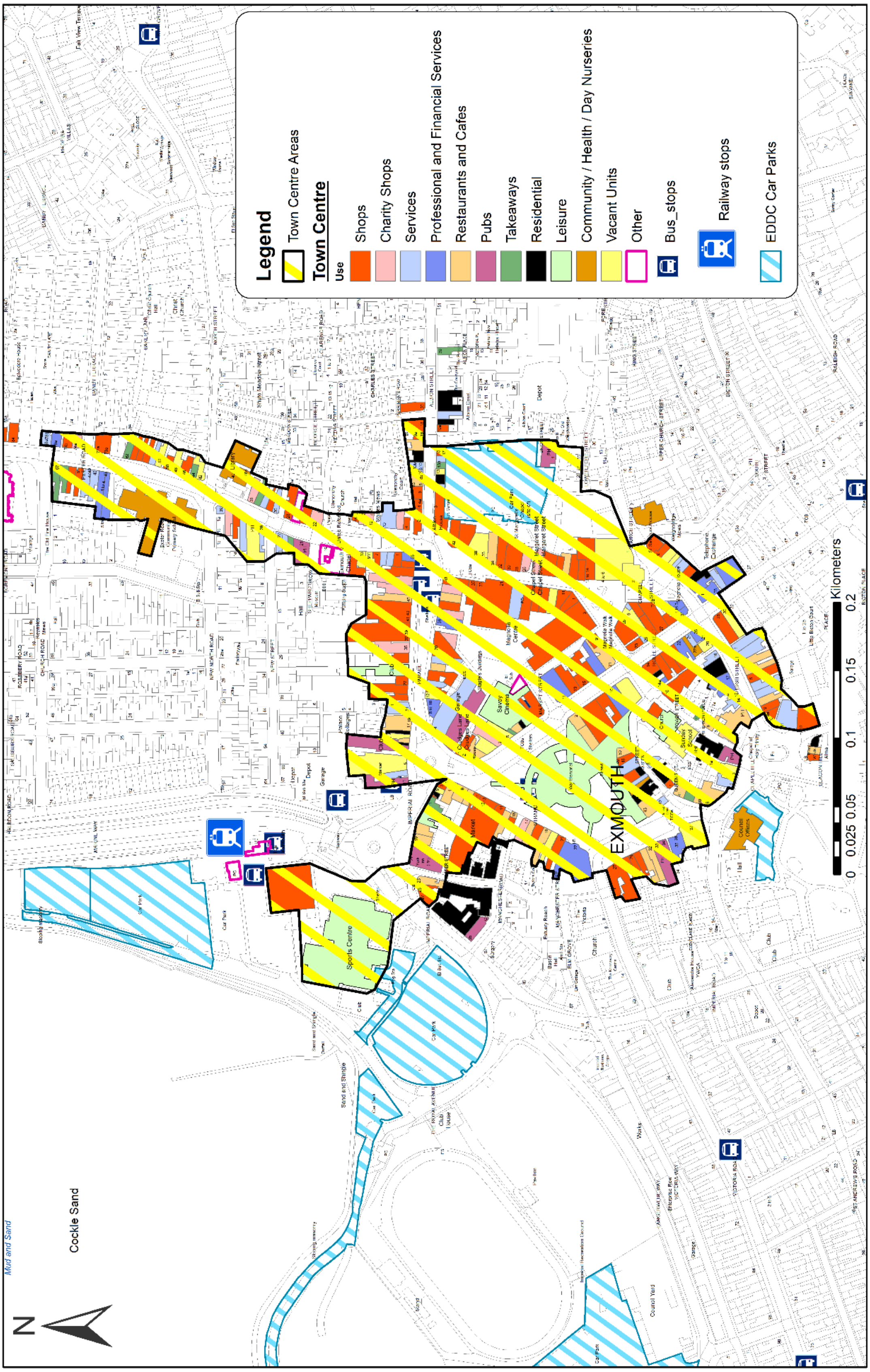
The first Exmouth plan shows the survey frontage results. On the basis of the survey the second and third Exmouth maps show the proposed policy boundary areas for the town.

Exmouth Retail Survey

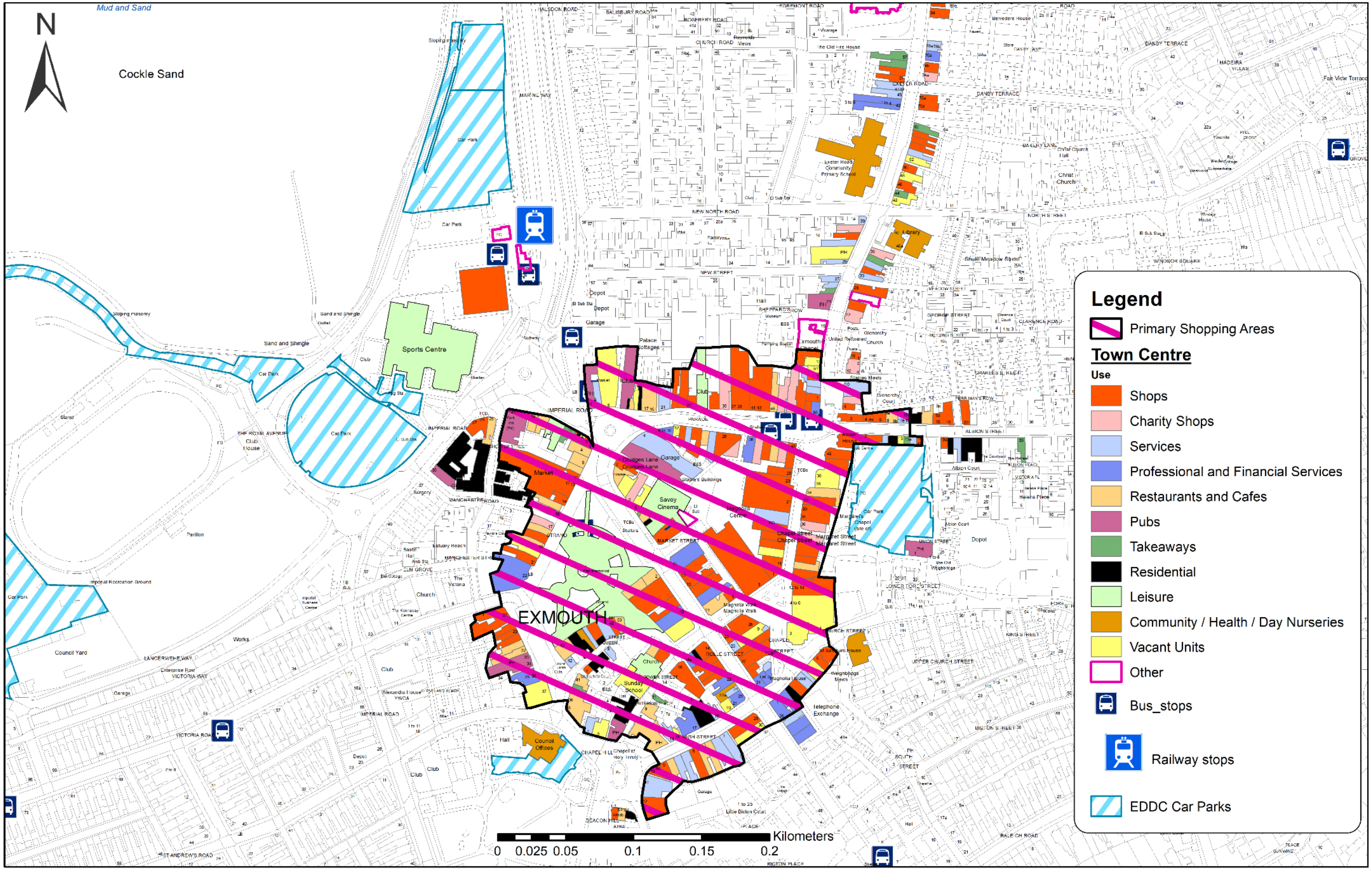


Town Centre Retail Survey
- Exmouth -

Exmouth Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey
- Exmouth -



Town Centre Retail Survey
- Exmouth -

Evaluation of Boundaries at Honiton

Honiton is centrally located in East Devon. The commercial core of the town is dominated by the north-east / south-west aligned High Street (former Roman road) that bisects Honiton. The town centre is second only in size in East Devon rankings to Exmouth and it has become a renowned centre for antique traders and is historically rooted in the lace trade. Twice weekly street markets have been held since medieval times and the very wide High Street makes it possible for stalls to set up along both sides of the road for around 150m. Since the last survey, the cattlemarket (to the north and behind the High Street) has closed and is being redeveloped.

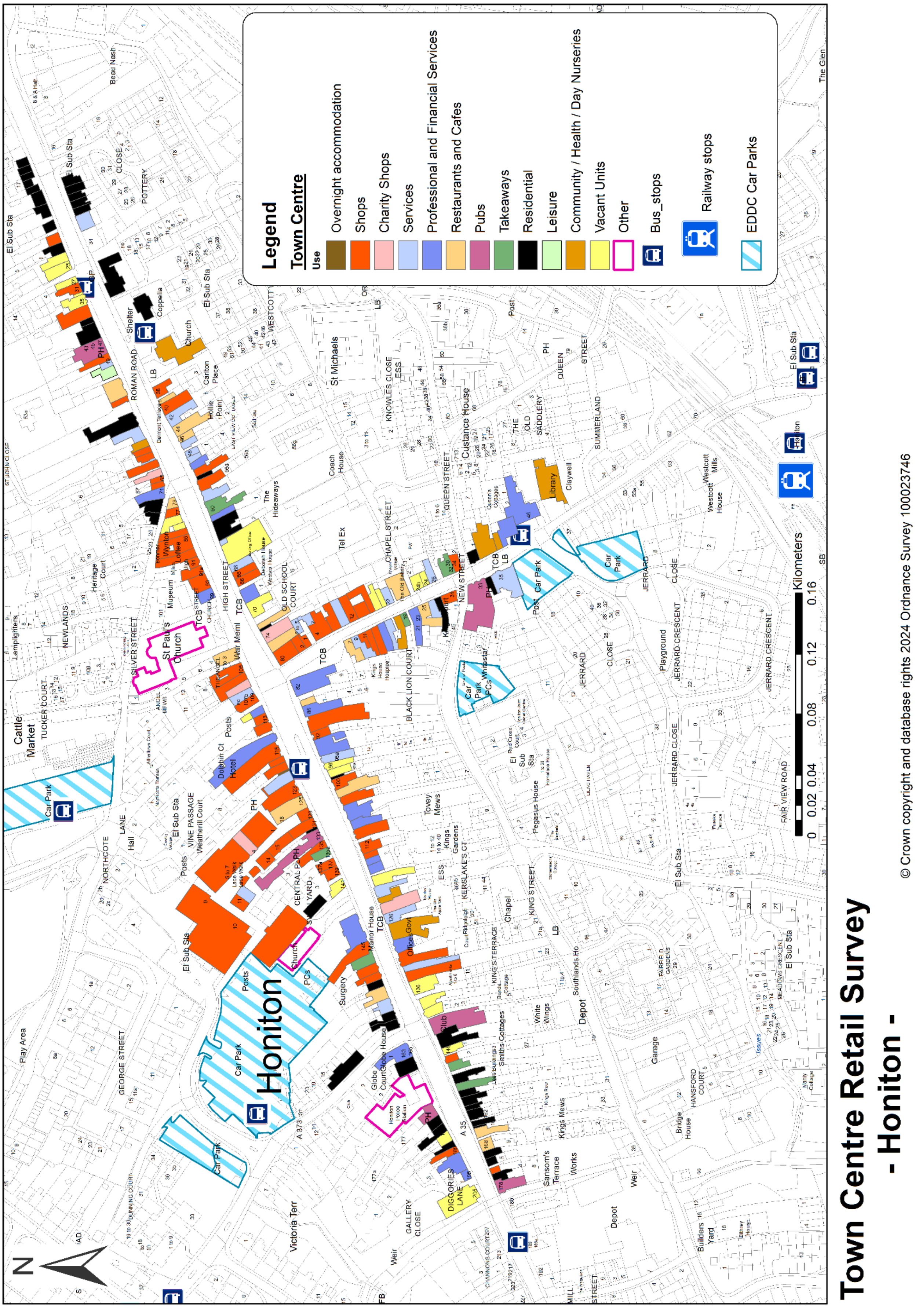
Most of the shops and commercial premises front on to the wide boulevard style High Street with a main shopping street south, towards the train station, from the middle of this street. There are several much smaller shopping streets running north/south from the High Street.

There are a wide range of independent retailers in the town (many specialising in antiques) as well as several national chain stores. There are a number of vacant units and charity shops in the town and a high presence of other businesses.

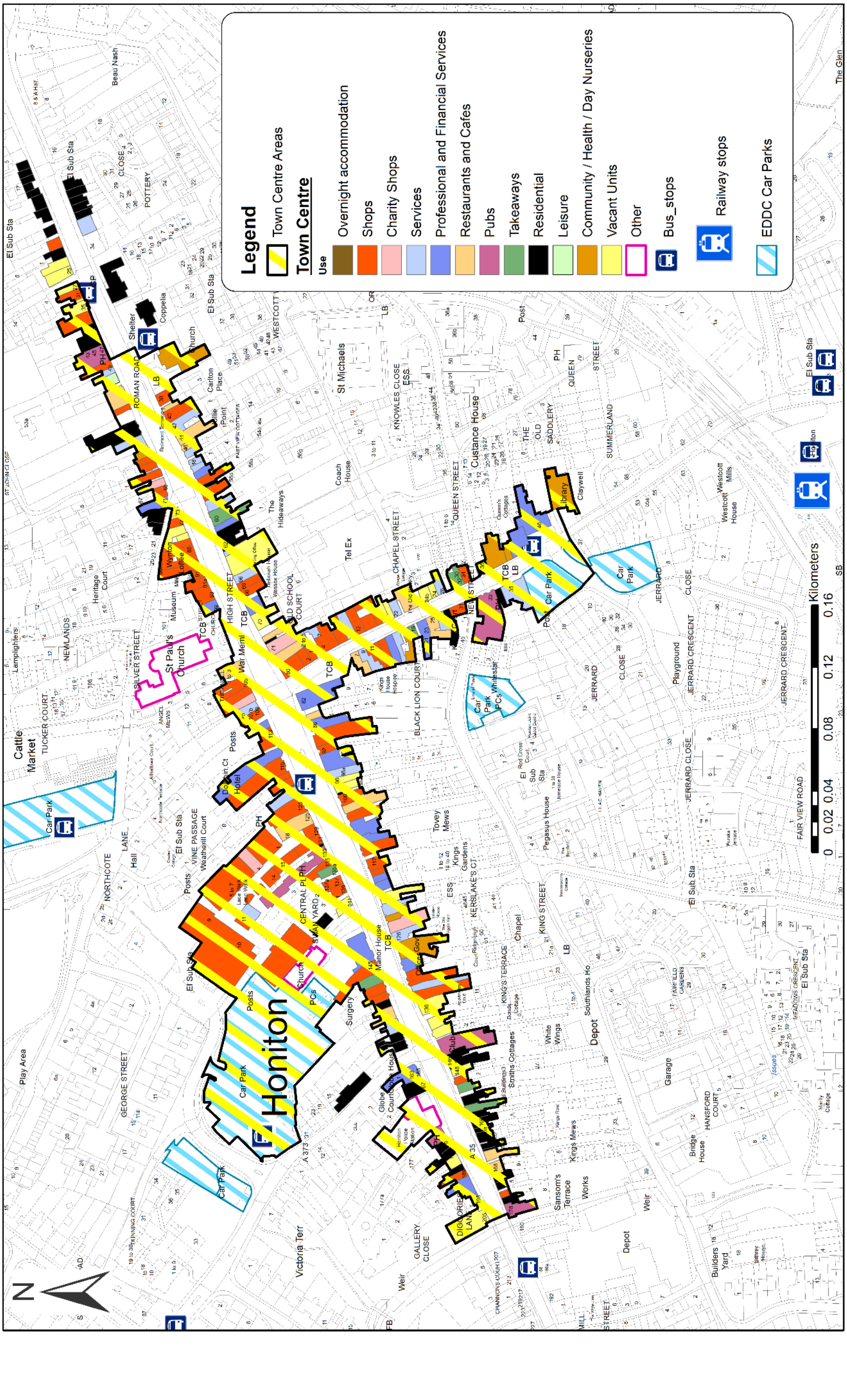
The town centre has a major supermarket in the form of a Co-op and also other larger food stores. The largest supermarket in Honiton, a Tesco store, lies on the southern edge of the town around 1.5 kilometres form the town centre. On the western edge of Honiton, 1.5 kilometres from the centre is the Heathpark business/retail park. There are a number of retail premises at Heathpark including a large Homebase and Lidl supermarket.

The first Honiton plan shows the survey frontage results. On the basis of the survey the second and third Honiton maps show the proposed policy boundary areas for the town.

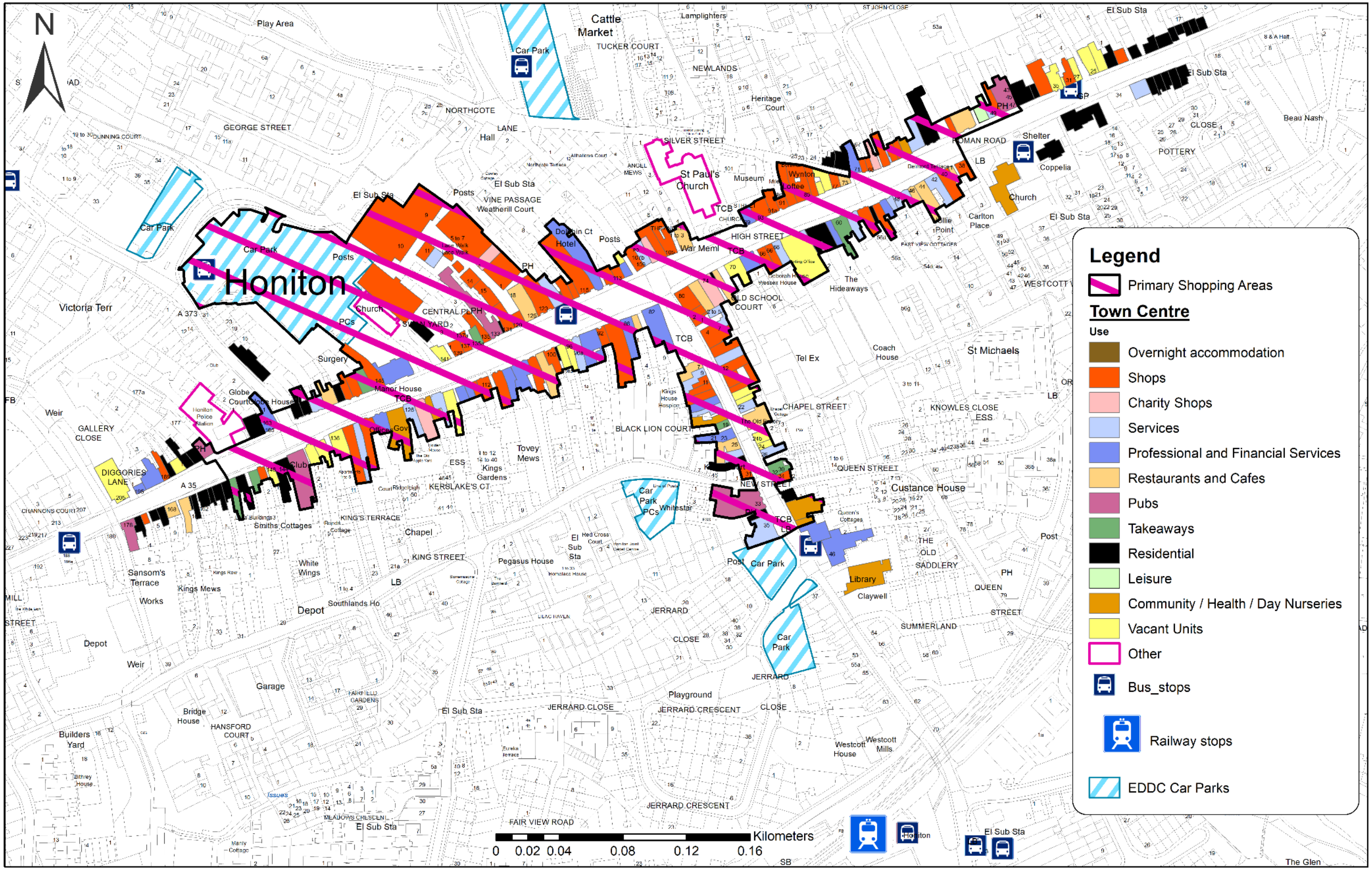
Honiton Retail Survey



Honiton Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey
- Honiton -



Town Centre Retail Survey

- Honiton -

Evaluation of Boundaries at Ottery St Mary

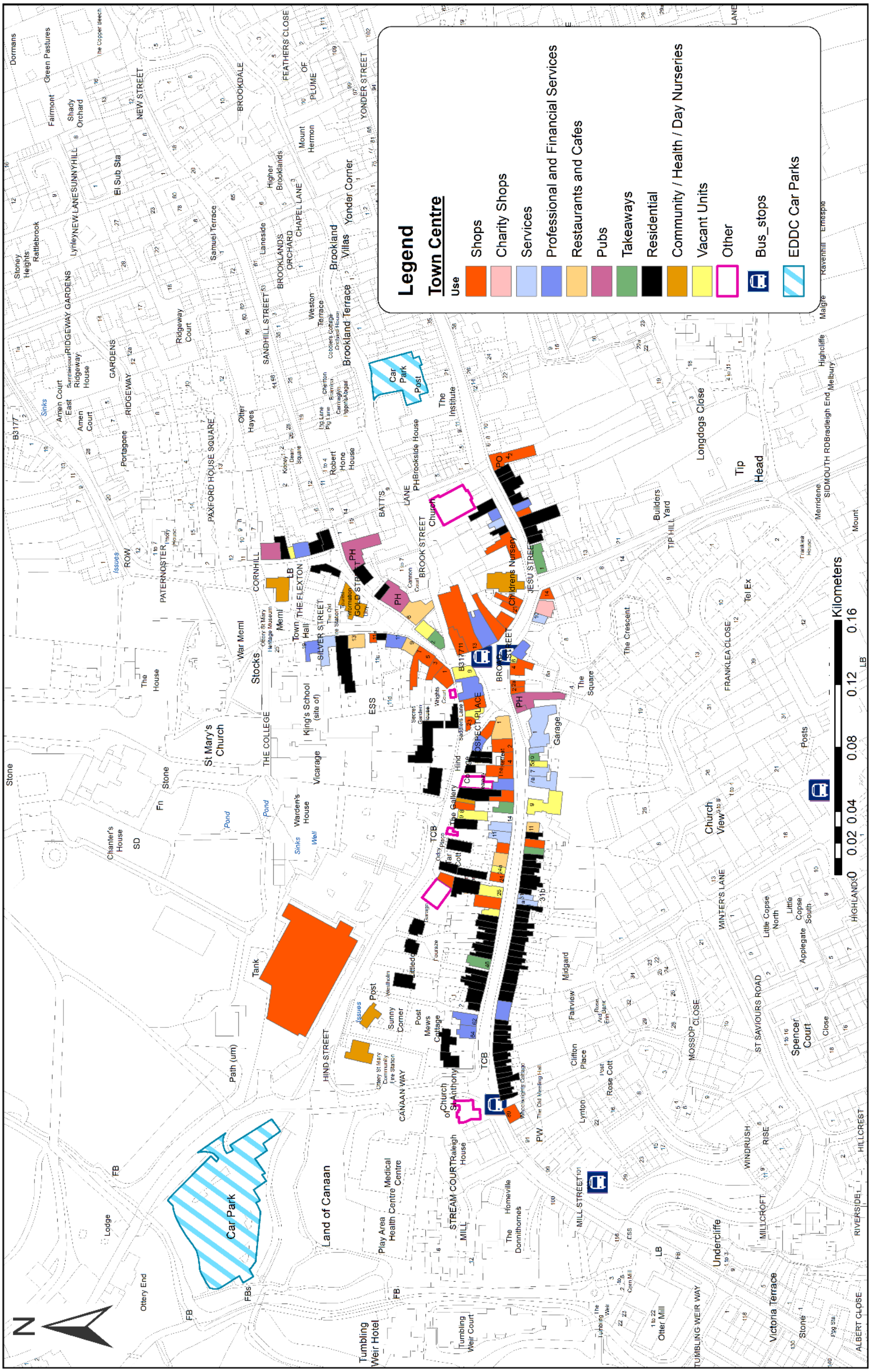
Ottery St Mary is a small East Devon town located within easy commuting distance of Exeter. The town focuses on a medieval market place, now the junction of several roads. The small historic core of the town forms the focal point of commercial activity and the town supports a medium range of mostly independent traders. There are a comparatively small number of food/drink and other non-retail commercial premises in the town and some vacant units and charity shops.

Congestion is an issue in parts of the town as the medieval layout has created several 'pinchpoints' and a lack of offstreet parking has exacerbated the situation. Shortly before the last survey an edge of centre larger supermarket, a Sainsbury store opened, and this has provided some short term car parking and pedestrian links to the town centre. As well as Sainsbury, there are a range of smaller food stores in the town. Since the last survey the number of vacant units has increased slightly.

On the northern side of the town, and divorced from it, lies Otter Nurseries a garden centre offering a wide range of retail goods and a substantial cafe. Adjoining it lie several other large cafe/retail outlets.

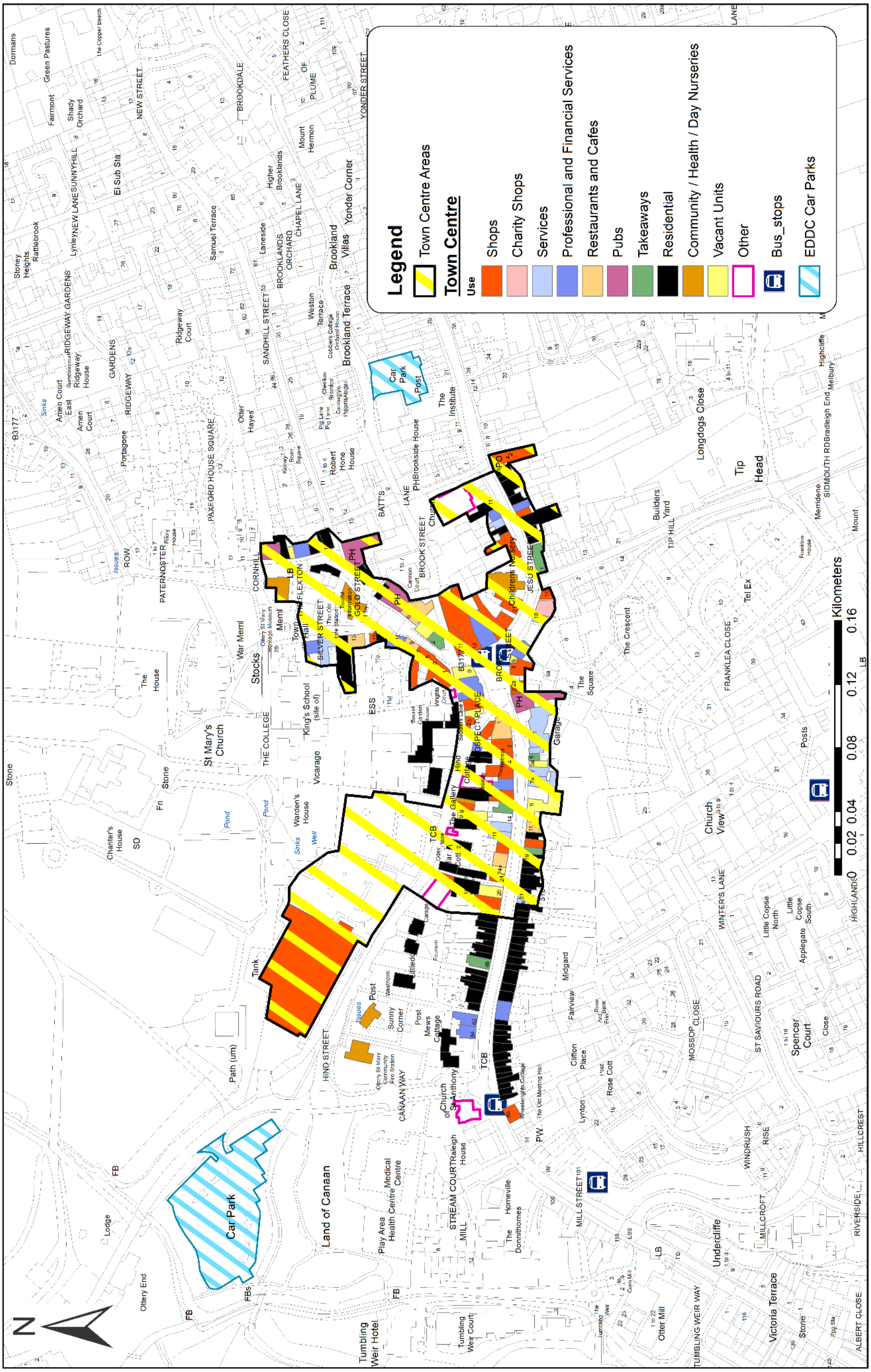
The first Ottery St Mary plan shows the survey frontage results. On the basis of the survey the second and third Ottery St Mary maps show the proposed policy boundary areas for the town.

Ottery St Mary Retail Survey Map

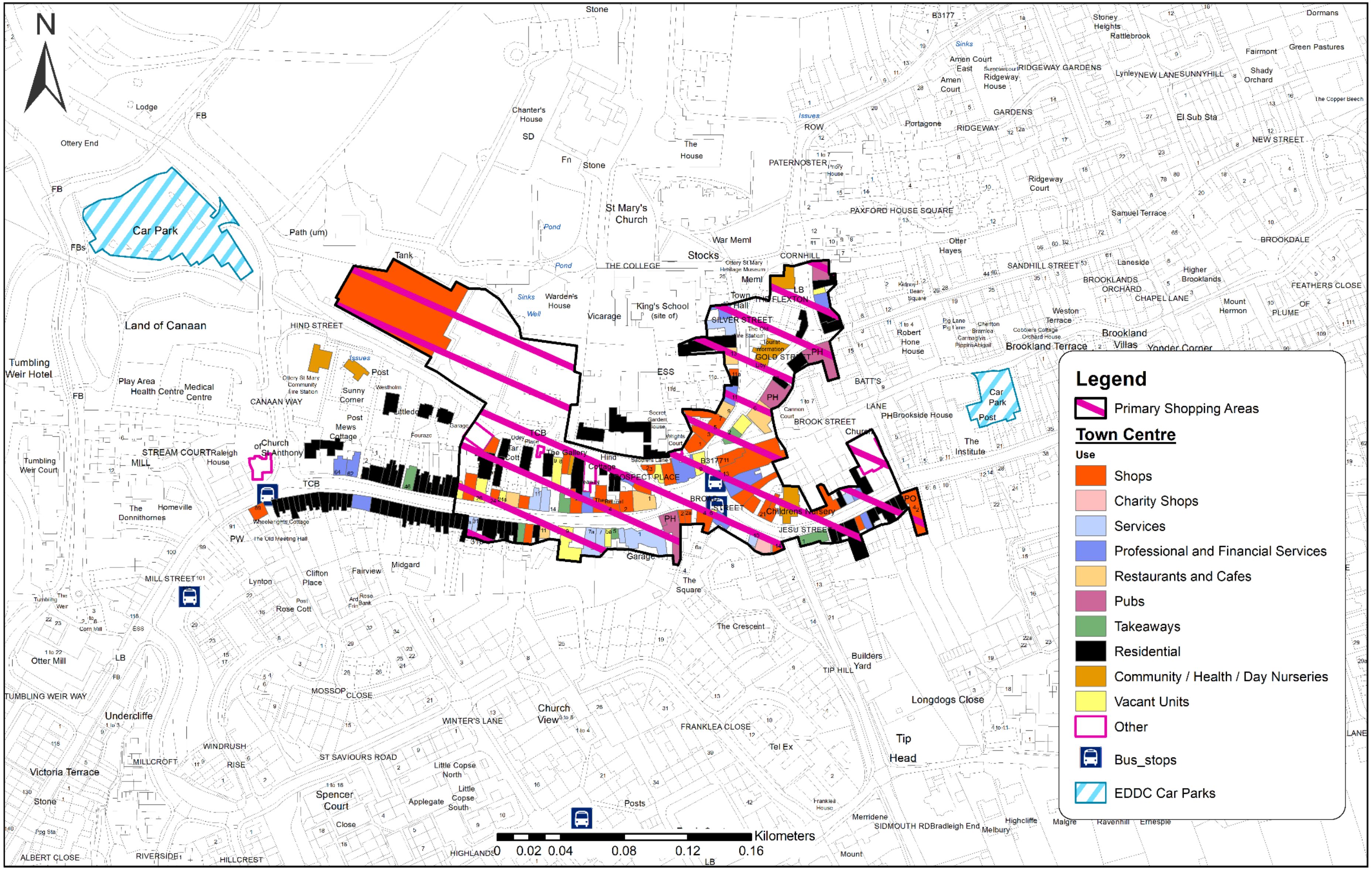


Town Centre Retail Survey
- Ottery St. Mary -

Ottery St Mary Proposed Town Centre Area and Primary Shopping Area Maps



Town Centre Retail Survey
- Ottery St. Mary -



Town Centre Retail Survey
- Ottery St. Mary -

Evaluation of Boundaries at Seaton

Seaton town centre is located in the southern part of the town, set back from the seafront.

The town has several shopping streets, though shops are not as tightly grouped together as in other East Devon towns. The town centre has a central pedestrianised area and is served by a number of car parks. There are a wide range of independent retailers in the town but only a limited number of national chain stores.

Although not as vibrant as other East Devon towns Seaton does benefit from a resident population trade and seasonal tourism trade. Several of the shops, especially closer to the seafront area, are targeted at a summer trade holiday market.

Seaton has a comparatively large number of café's and bars, again tailored to a seasonal holiday market.

The town does have a comparatively high number of vacant units (compared to other East Devon towns) although this is still considerably below the national average.

At the outer edges of the town centre the retail pattern/presence of shops tends to merge with increasing residential properties rather than coming to an abrupt end. There are several charity shops in the town (large numbers of charity shops are seen as an indicator of struggling centres) but this has not increased significantly since the last survey.

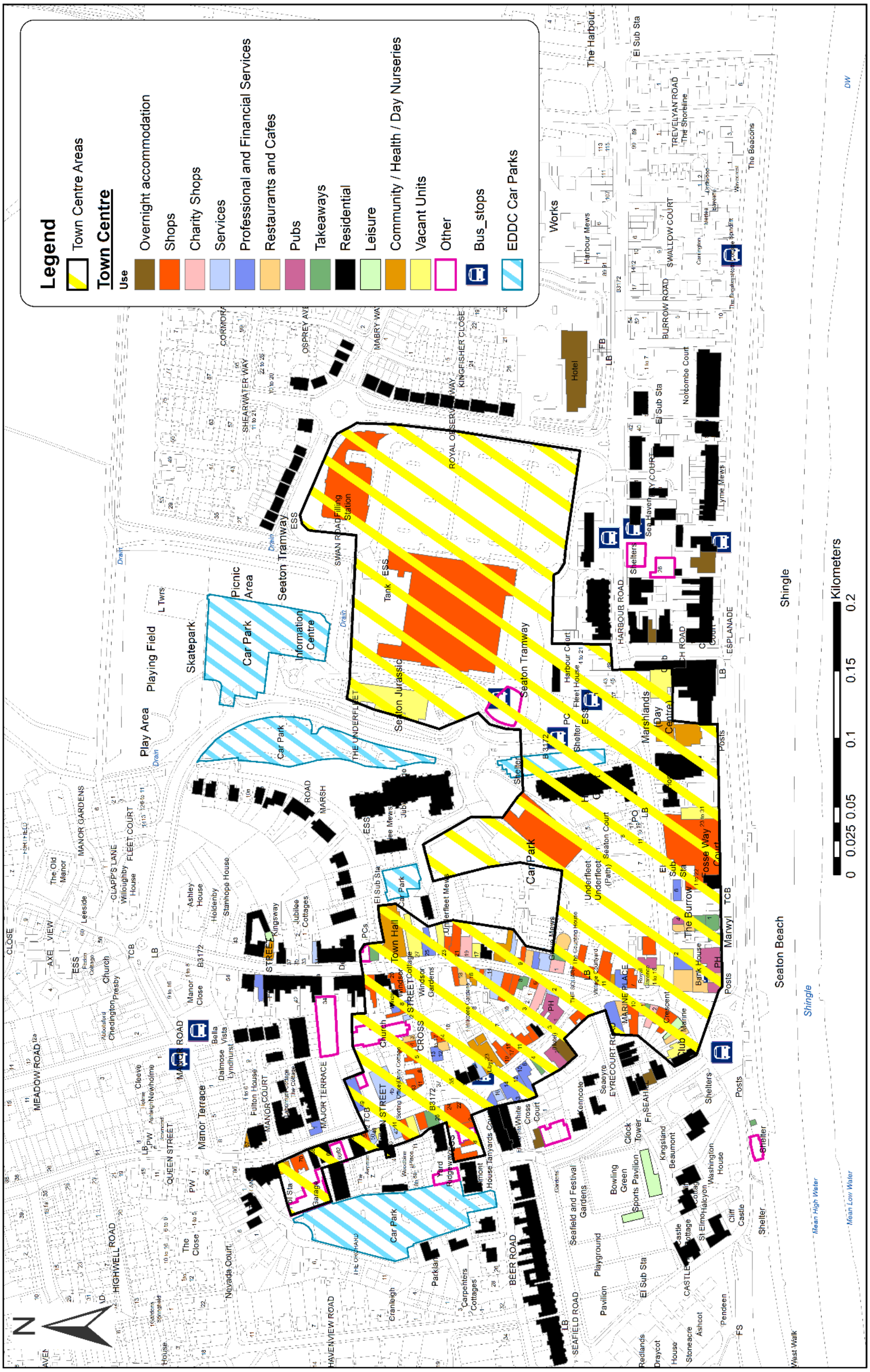
Supermarket provision in the town is dominated by the large Tesco supermarket that opened in late 2011 and lies to the east of the town centre. Closer to the town centre, and also on its eastern side, is a much smaller supermarket building previously occupied by Co-Op but now home to Aldi opened in 2023.

The first Seaton plan shows the survey frontage results. On the basis of the survey the second and third Seaton maps show the proposed policy boundary areas for the town.

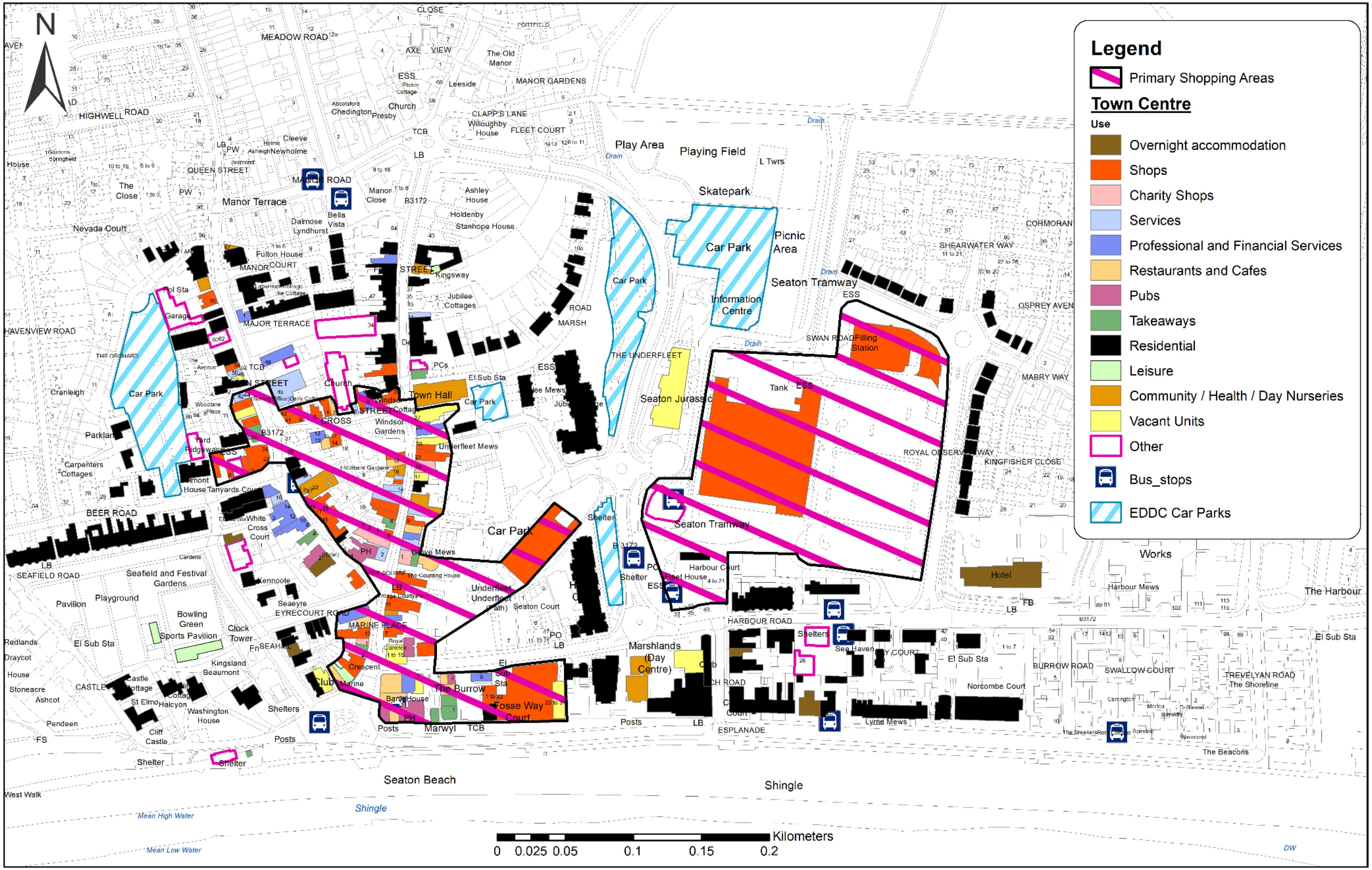
Seaton Retail Survey Map

Town Centre Retail Survey
- Seaton -

Seaton Proposed Town Centre and Primary Shopping Area Boundaries



Town Centre Retail Survey
- Seaton -



Town Centre Retail Survey
- Seaton -

Evaluation of Boundaries at Sidmouth

Sidmouth town centre is located in the southern part of the town set back from the seafront. Sidmouth is a commercially successful town centre with a vibrant long main shopping street (and subsidiary streets) and very few vacant units. The town centre is part pedestrianised and served by a number of car parks. The town has a good selection of independent retailers as well as a number of national chain stores.

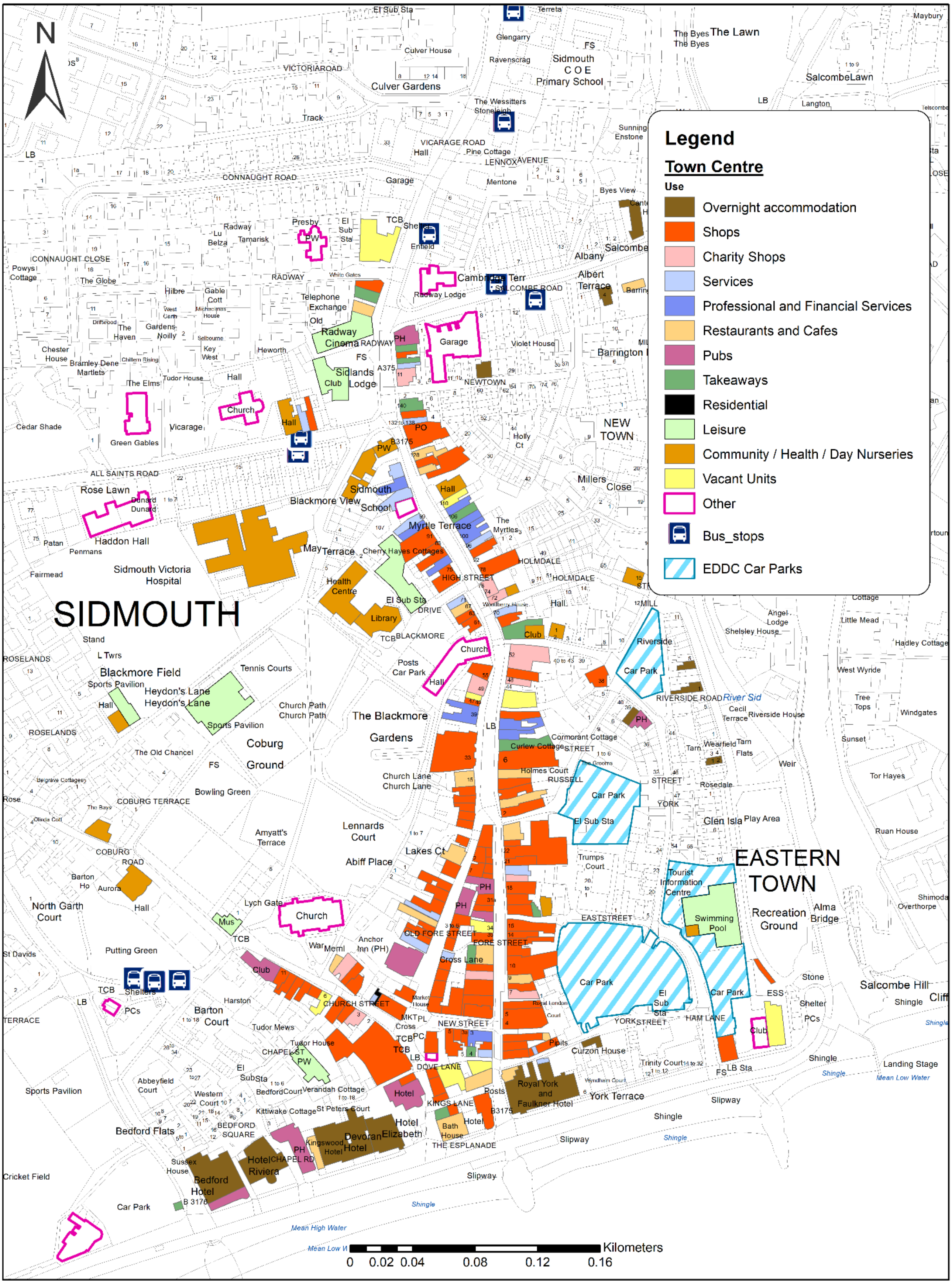
East Devon District Council, the town's major employer with around 500 staff, relocated to Honiton since the last survey but this does not appear to have had a lasting major impact on the town centre.

The town benefits from not just a resident population of shoppers but also from a vibrant tourism trade. There are no major supermarkets in the town centre although Co-op and Tesco have smaller format shops in the centre. Larger supermarkets are found away from the town centre in the form of a Lidl's store, roughly in the geographic centre of the town, and a Waitrose store on the northern edge of Sidmouth.

The first Sidmouth plan shows the survey frontage results. There is a comparatively low presence of charity shops in the town (large numbers of charity shops are seen as an indicator of struggling centres) and there are a wide selection of bars, cafés and restaurants. It is noticeable that several properties have changed use to housing since the last survey but these were mainly non-retail uses such as bank premises.

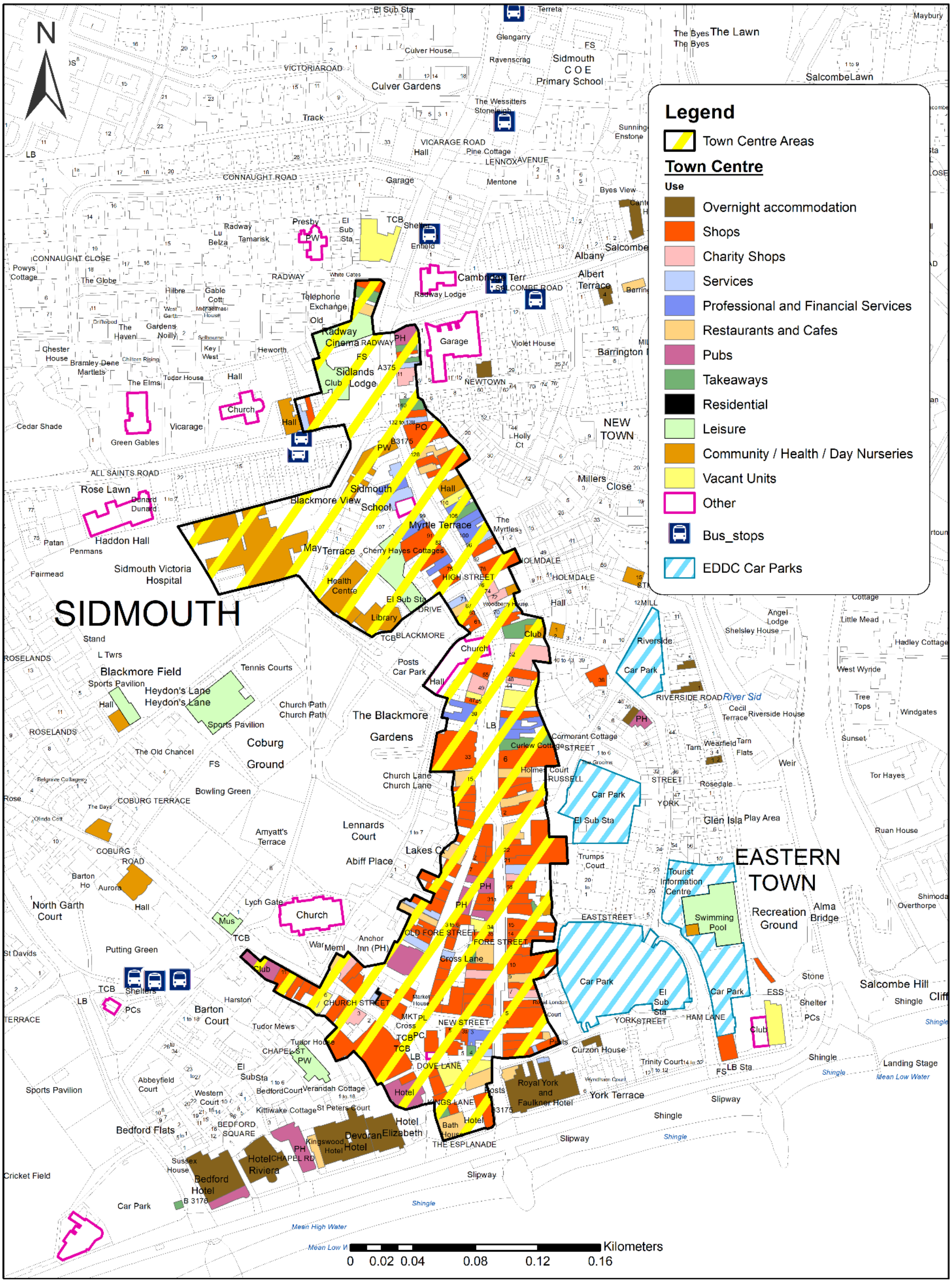
On the basis of the survey the second and third Sidmouth maps show the proposed policy boundary areas for the town.

Sidmouth Retail Survey Map

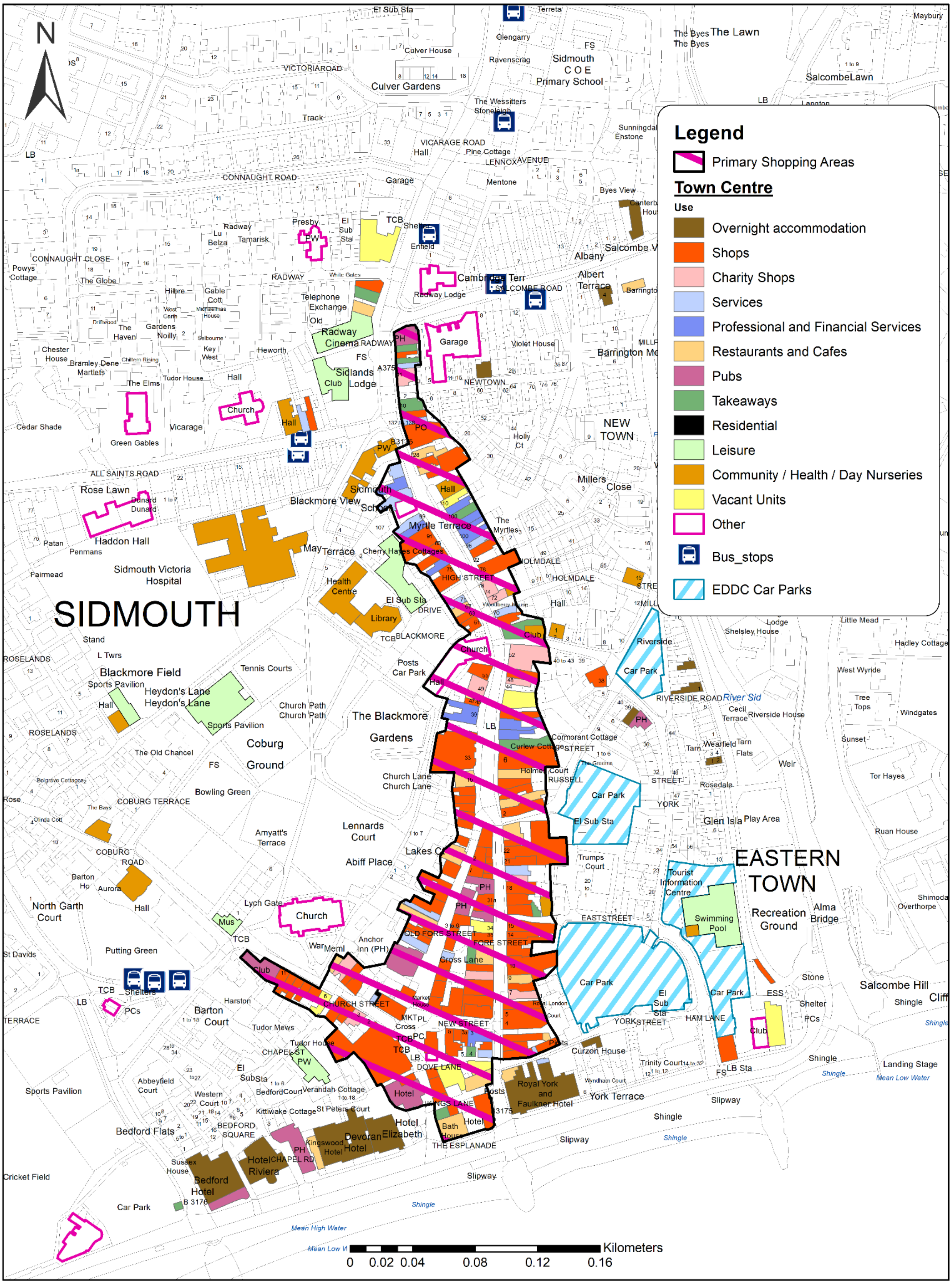


Town Centre Retail Survey
- Sidmouth -

Sidmouth Proposed Town Centre and Primary Shopping Area boundaries



Town Centre Retail Survey - Sidmouth -



Town Centre Retail Survey
- Sidmouth -

Conclusions

The town centres of East Devon all offer a reasonable range of stores and all can meet day to day shopping needs, the possible exceptions being Budleigh Salterton and Cranbrook (currently) which lack a larger supermarket. Beer and Colyton offer smaller foodshops which can still meet most residents everday needs and are within relatively short distances of the large supermarket at Seaton.

With the exception of Cranbrook, the inland town centres all focussed on, and grew up around, their medieval street markets and these have been a key reason for the road layouts today. These markets have only been retained on a weekly basis in Axminster and Honiton, although all of the towns have less regular 'special' events. The potential to increase the number of street markets, as encouraged by the NPPF, is constrained by the lack of town centre space available on a very regular basis and the need to temporarily close roads or car parks for such activity.

Whilst there are varying degrees of commercial activity in all of the towns and some, notably Sidmouth, are more vibrant than others none of the towns are dominated by vacant stores and/or charity shops.

On this basis the town centres of East Devon can be seen to be performing well compared to many other town centres and High Streets in Britain.

On the basis of the survey work undertaken it is credible and desirable to define town centre areas and primary shopping areas for the towns of East Devon. Proposed areas are defined on the maps in this report. Views are welcomed on this report which will be subject to refinement and will be used to justify policy in the East Devon Local Plan through to submission and examination.

APPENDIX 1- Summary of Responses to the Issues and Options Consultation

Chapter / Topic / Qu	Summary of main issues	Officer response
Town Centres / 15 / Summary	Most respondents favoured mixed commercial uses in town centres, with over half of respondents supporting leisure or community uses and very little opposition to these. Dominant retail use (as has traditionally been promoted by policy) received around 30% support and a similar level of opposition. In the written comments the use of upper floors for services, community activities and housing was strongly supported and a range of measures suggested to encourage this. A significant proportion of respondents (around 20%) were opposed to change of use to housing, although this also received considerable (quantified) support. In the written comments most concern related to the permanent loss of retail units to housing and the consequent impact on the retail function of the town centres. Edge-of-centre and first floor residential use received considerable support. The need for town centres to be vibrant social spaces was expressed by many respondents. A range of activities, areas to sit and increased community, health and service uses were seen as a major draw.	The responses are noted and will inform Town Centre policy.
Town Centres / 15 / General	The objective should be to build self sustaining communities for a diverse range of people/ retaining community cohesion and high footfall	This will be a key policy aim
Town Centres / 15 / General	Service industries and cafes should be encouraged to improve vitality. If these can be established above shops that would double the footfall	These are uses which are encouraged in town centre policy.
Town Centres / 15 / General	A strong focus on heritage, culture and the arts to make each town centre special	This is an objective of the town centre and built heritage policies.
Town Centres / 15 / General	Plan for social spaces (café's, gardens, stalls, pop-up shops) to encourage use of outside areas. Encourage street markets, music, food events to create vitality	Noted. Policy encourages such uses but the temporary nature and 'on street' location means that the actual events are beyond the scope of the local plan.

Chapter / Topic / Qu	Summary of main issues	Officer response
Town Centres / 15 / General	Uses at first floor and above should be strongly encouraged - Gyms and leisure uses, housing and community use	This will be a key policy aim
Town Centres / 15 / General	Housing should not dominate but should be integrated to maintain a mix of uses and reduce vehicle movements/Allow housing on the edge of centres but retain centre for shopping/services. Only allow housing where adequate facilities (including parking and outside space) can be provided for the residents.	This will be a key policy aim
Town Centres / 15 / General	A split of opinion between it being better to have housing than empty shops and concern that, once a shop is changed to housing, it is permanently lost.	Noted
Town Centres / 15 / General	Retail uses should be promoted in town centres and footfall is still encouraged despite on-line shopping. This could include town centre showrooms with goods available to see/try on before collection/delivery from warehouses, speciality retailers and goods collection points e.g. for those who aren't at home to collect packages.	Noted. The town centre and primary shopping frontage policies aim to encourage and retain retail uses.
Town Centres / 15 / General	Greater pedestrianisation (day-time car free streets) and more convenient public transport	Traffic management is a County Highways matter but policy can support greater pedestrianisation and improved access to public transport through the strategic and design policies of the plan, by directing development to those settlements best served by public transport and by making layouts accessible and convenient to walkers.
Town Centres / 15 / General	Cheaper business rates, car parking and affordable space for community groups and arts	This is beyond the scope of the local plan
Town Centres / 15 / General	Promote shared community use- for sports/gyms but also education/culture/spiritual uses	Policy will require this

Chapter / Topic / Qu	Summary of main issues	Officer response
Town Centres / 15 / General	Potential for seaside towns to be redeveloped, prioritise removing existing eyesores and establish a coherent character for new development	This will be addressed through the local plan town-specific chapters and design policies
Town Centres / 15 / General	Rural settlements should not lose existing retail and community facilities.	Policy will resist the loss of existing facilities in these settlements and encourage provision of new/additional facilities.
Town Centres / 15 / General	Need to accept that private cars are inevitable in rural areas	Noted. Policy intent is to reduce the need to travel and the impact of private vehicles through a combination of settlement self-containment, directing new development to the most sustainable locations, encouraging waling, cycling and public transport and requiring provision for electric vehicles.
Town Centres / 15 / General	Policy should be flexible so that it can quickly respond to changing circumstances	Policy is intended to be flexible and responsive.
Additional town centre policy objectives / 16 / Summary	Paragraph 7.6 of the Issues and Options report identified three additional areas where policies may be appropriate including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement. Views were sought on whether these were appropriate. Although most respondents (67%) ticked the yes box, a number did suggest other objectives or qualify their choice.	Support for the suggested additional policy areas is welcomed.
Additional town centre policy objectives / 16 / General	Different responses are needed for each town centre. These should be produced in consultation with the local community and neighbourhood plans.	It is envisaged that the Plan will include town-specific chapters, with policies informed by consultation and NP's (as well as other evidence)
Additional town centre policy objectives / 16 / General	Out of town retailing should be resisted and, where it is allowed, should have similar conditions to town centres e.g. parking charges and be accessible to pedestrians and cyclists	It is envisaged that a sequential approach will be taken, with town centre locations being preferred to out of town locations. Parking charges are not within the control of the local plan

Chapter / Topic / Qu	Summary of main issues	Officer response
Additional town centre policy objectives / 16 / General	Make centres pedestrian and public transport friendly. Make car parking cheap or free.	The local plan will promote sustainable methods of transport and design/layouts which facilitate public transport, cycling and walking. Parking charges are not within the control of the local plan
Additional town centre policy objectives / 16 / General	Offer a town wide online presence so small retailers can offer goods online and share costs	This is a town management matter and is outside the scope of the local plan
Additional town centre policy objectives / 16 / General	Need to promote local foods and goods, encourage farm shops but not as competition to the High Street shops (or there could be a co-op shop for local farmers to sell through)	This is a town management matter and is outside the scope of the local plan
Additional town centre policy objectives / 16 / General	Redevelop out of town shopping areas as housing (especially sheltered housing)	It is intended that retail uses on employment sites would revert to employment uses if retail is no longer viable. Permitted development rights (depending on size and location) may allow retail units to be converted into houses without permission in some cases.
Additional town centre policy objectives / 16 / General	Accept out of town retailing and improve access to it and the shopper experience. Encourage linked trips to town centres.	A sequential approach will be taken, with town centre locations being preferred to out of town locations.
Additional town centre policy objectives / 16 / General	Make town centres social spaces and focus on the shopper experience	It is envisaged that this will be a key aim of town centre policy

APPENDIX 2- Summary of Responses to the Draft Local Plan Consultation

Policy 56 - Town centre hierarchy, sequential approach and impact assessment

• Unsure how this will regenerate town centres.
• Support that out-of-centre sites should be accessible by bicycle and well connected to the centre.
• 'Edge of (town) centre' developments should only be allowed where it is shown there will be no adverse impact on the vitality and economic vibrancy of its nearby town centre.
• Prefer current policy.
• This hierarchy seems wrong. Tier 3 centres vary considerably. Budleigh is fairly large. Lympstone has a train line. The other three settlements should be tier 4.
• The accessibility of edge-of-centre and out-of-centre sites on foot and bike needs to be such that anyone can use the provision rather than only being possible for those who are fit and able or confident enough.
• Exmouth town should be redeveloped as it has lost it's historic character and is bland and run down. This could extend to celebrating maritime heritage on the seafront, restoring the arcade building and building a new swimming pool with hot tubs
• Independent businesses with a focus on sustainability need encouraging. Farm shops could be located in towns.
• Focus housing in the town centres (especially Exmouth) as an alternative to building on the AONB's/countryside
• Shop frontage and signs must also be kept in keeping with the heritage of the area as this too can have a negative impact on the area.
• Artisan markets and craft markets and farmers markets should be encouraged
• Out of centre sites should be actively discouraged and policy should reflect this. A 'sequential test' is very unlikely to be robust enough to protect our town centres.
• The policy does not recognize the problems that our town centres face, the issue of adequate and cheap parking, and does not offer any hope for improvement
• Sidmouth Cycling Campaign support the policy that out of centre sites should be accessible by bicycle and well connected to the centre.
• Exeter Cycling Campaign would like 'by these modes' to be added after 'centre'. Currently this doesn't actually say that they should be well-connected to the centre by public transport, bicycle and foot. They can be accessible from some other point by all those things, but not necessarily the centre, so this should be explicitly stated.

Policy 57 - Town Centre development

• Devon County Council welcome this policy but suggest it is strengthened to ensure there is no overall erosion of critical mass of activity within its retail core.
• Devon Wildlife Trust advised the requirement for enhancement of the natural environment should be included within this policy. The provision of well designed, connected, diverse natural corridors through town centres can act as important flagship projects showcasing the benefits of the natural environment.
• Cranbrook town centre is poorly designed and doesn't really exist. It isn't clear where the shops are/will be and they aren't close to the station.
• Support the reference to shop frontages as it is consistent with the current SPD relating to Exmouth's shop front policy.

• Object to loss of retail premises to housing.
• The statement that change of use to residential will only be permitted if 'there is no demand for town centre use' should be strengthened. With an increasing number of businesses closing it would be good to see more positive proposals for invigorating town centres.
• Should Beer really be in this group?
• Exmouth Town centre lacks visual appeal. There needs to more character and are good examples of this are Sidmouth, and cities such as Bath.
• Rejuvenation (of Exmouth) is a must and to encourage independent, sustainable businesses rather then more hairdressers, charity shops and fast food outlets.
• This is a standard version of a long-established policy. The use of upstairs accommodation for residential purposes is greatly discouraged because many of our town centre buildings are listed or are situated in a Conservation Area, so alterations to allow occupation are very expensive and are often rejected.
• Exeter Cycling Campaign would like to explicity mention the need to enable cycling as a means of transport, with prominence given to properly-designed and located cycle parking. Towns like Honiton and Axminster currently have very few Sheffield cycle parking stands and these are often inconveniently located.
• Churchill Retirement Living supports the proposed Exmouth Town Centre boundary.

APPENDIX 3- Methodology for Town Centre Policy Evaluation

Note- this was produced as an internal document to guide Officers in undertaking the work and therefore constitutes a background document only.

Town	Tier
Exmouth	One- Principal Centre
Axminster	Two- Main Centre
Cranbrook- addressed in the Cranbrook Plan	Two- Main Centre
Honiton	Two- Main Centre
Ottery St Mary	Two- Main centre
Seaton	Two- Main Centre
Sidmouth	Two- Main centre
Budleigh Salterton	Three- Local Centre
Colyton	Three- Local Centre
Beer	Four- Service Village

Summary- Two plans to be produced for each town:

the first will identify the main ground floor uses (this work should be undertaken in the next few weeks)

the second will identify the town centre area and the primary shopping area based on these uses (following a team discussion to ensure a consistent approach)

The plans should also identify any possible areas for regeneration/redevelopment within, or close to, the town centre and areas within the town centre which could be used for temporary or community events, including pop-ups and markets.

This will be accompanied by a short text identifying the special characteristics of the town centre, discussing the current uses and town centre 'health' (at a high level) and considering the possible future availability of vacant/underused/regeneration sites in and around the town centre.

The NPPF requirements and definition of terms is set out in the report.

Introduction

1.1 The NPPF requires the Local Plan to 'define a network and hierarchy of town centres' (see appendix 2) and this corresponds to the table above. Budleigh, Colyton and Beer are included on the list because they all have recognisable main shopping streets and we wish to see their retail function protected. Cranbrook town centre is not yet established but for future reference the survey will record what is there.

1.2 The NPPF then requires policy to 'define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre'. The starting point for this work will be an evaluation of existing retail activity in the town centres and indications of town centre health.

Survey methodology

2.1 In March 2012 surveys were carried out in the seven main towns of East Devon. These will be the starting point for the current assessments. The March 2012 surveys assessed the principle use of the frontages of buildings in the town centre areas at ground floor level only. The frontages of buildings were classified on the basis of the following (Use Class) categories:

March 2012 survey:
• A1 – shops (shown in red on plans) with charity shops forming a sub-category (this included uses such as hairdressers and opticians); • A2 – Professional and financial services (blue); • A3 – Restaurants and cafes (orange); • A4 – Pubs (purple); • A5 – Takeaways (green) • Vacant units (yellow); and • Other (no colour/grey on maps).

2.2 Since the previous survey the Use Classes Order has undergone a significant revision and so this study will be looking at a wider range of uses than the 2012 study. Many of the Class A uses have been incorporated into the new Commercial, Business and Service use Class E and this is identified in the NPPG as 'a broad and diverse range of uses which principally serve the needs of visiting members of the public and/or are suitable for a town centre area'. Class E allows for a mix of uses which recognises that a building may be in several different uses concurrently or be used for different uses at different times of the day. The class incorporates the whole of the previous shops (A1) (apart from those that now fall within scope of the F2 Local Community use class), financial and professional services (A2), restaurant and cafes (A3) and business (B1 including offices) use classes, and uses such as nurseries, health centres and gyms (previously in classes D1 non-residential institutions, and D2 assembly and leisure) and it seeks to provide for new uses which may emerge and are suitable for a town centre area. Not all uses of land or buildings fit within the use classes order and this 'sui generis' category (which can't change use as PD) includes theatres, public houses, hot food takeaways, petrol stations, taxi businesses, and casinos (these examples are not exhaustive).

2.3 In the first instance the study requires Officers to:

- survey the town centre, identifying the predominant ground floor uses as per the box below, taking the 2012 survey as a starting point to identify the extent of the town centre but being mindful of the new use classes.
- Identify any accessible open spaces in the town centre or edge of centre which could be used for temporary or community events, including pop-ups and markets as the NPPF encourages these.
- make notes of any areas within or close to the town centre, which could potentially be suitable for redevelopment, regeneration or for uses which can't find suitable town centre sites (eg supermarkets).

2.4 It should be noted that it is the street frontage that will be surveyed and the frontage that is the critical component of the survey work. It will be difficult to accurately assess the floorspace for any use and so it will be assumed that the whole ground floor is in the use recorded unless it is indicated otherwise (for example by stating that the use does not occupy the whole 'depth' of the building, or that the internal space is clearly divided between several uses and estimate what that split should be). To increase accuracy, business rate records and planning permissions can be used as necessary but may not be available in all cases. In the absence of this more detailed information, for ease of mapping Ordinance Survey defined building plots/blocks will be coloured in. A health warning will explain that the colouring in of plots/blocks will not indicate that all of the coloured in area is in a given defined use or function nor that there are active frontages (eg shop windows) on all external sides of premises.

2.5 Ideally, this survey would extend to upper floors but in practice this is difficult to undertake without entering the building and discussing the use with the occupiers. From outside it is not easy to differentiate between many uses, particularly residential, storage, vacant units and office space unless there is external signage, labelled door bells or similar. Given the resource constraints it is not proposed that the survey extend to upper floors.

- Shops (red) with charity shops forming a sub-category
- Service uses such as hairdressers, opticians, nail bars and other ‘experiences’ (light blue)
- Professional and financial services (dark blue)
- Restaurants and cafes (orange)
- Pubs (purple)
- Takeaways (dark green)
- Houses (grey)
- Leisure (bright green)
- Community/health/day nurseries (although these are not the same use classes) (brown)
- Vacant units (yellow); and
- Other (no colour)

2.6 To ensure consistency, once the first stage survey work is complete the team will discuss boundary definition using an example town. In line with the NPPF, the policy approach will be one of defining Town Centre areas to encompass broad central areas in towns where there is existing retail and commercial activity and potential to accommodate more activity. Using this survey information the team will seek to identify the extent of the Town Centre and the Primary Shopping Area on a map (this will be transferred onto the Proposals Map later). The town centre should be of a size that ensures it is large enough to provide flexibility and scope for more activity but without being so large that it could lead to dispersal of commercial activity into separate unconnected areas of the town. Ease of physical movement and connectivity is seen as critical, therefore the defined shopping area should be comfortable to walk around and across for reasonably active people. Uses which support, and are essential to, town centre activity, for example public transport hubs, should be included within the town centre as we would not want to lose these to other uses. Given the range of uses in Class E (and the permitted changes between uses) and the relatively constrained town centre areas, these areas may coincide but this is a matter for discussion.

Town Centre Health

3.1 The presence of charity shops, along with vacant units, is considered to be an indication of poor town centre health (they typically pay less rent than other retail uses and enjoy rate relief and so their presence suggests a lack of demand for premises from other retailers). Please note which units are charity shops as this will inform the commentary. We have the 2012 maps for comparison and changes over the past 10 years should be noted and it should be possible to identify buildings/areas where vacancy is an issue.

Primary Shopping Frontages

4.1 In previous plans we have identified Primary Shopping Frontages which were tightly focussed on the principal areas of retail activity and commercial facilities with 'active' frontages which contribute to the vitality of the area. I do not propose to identify PSF's in this plan because the new E class allows the loss of retail to non-retail uses as permitted development and so it is superfluous.

Commentary

5.1 Please produce a short commentary for the town to provide an overview of the special characteristics of the town centre, an example from the 2012 study is provided over the page. The commentary should discuss the current uses and 'health' of the town centre (at a high level) and consider the possible availability of sites in and around the town centre for alternative uses in future. If there are longstanding regeneration aspirations for some towns eg Websters Garage in Axminster, or prominent long-term vacant buildings then these should be mentioned.

Appendix 1 (to the Survey methodology)

NPPF Requirements and Definitions of Terms

90. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

(a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
(b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
(c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
(d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
(e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
(f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

<u>NPPF Definitions</u>
Edge of centre
For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.
Main town centre uses
Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs,

nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Out of centre

A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Primary shopping area

Defined area where retail development is concentrated.

Town centre

Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

APPENDIX 4- Sequential Test Impact Assessment Threshold

The National Planning Policy Framework, in Paragraphs 90-95 requires all proposals for main town centre uses which are not in an existing centre or do not accord with an up-to-date plan to be subject to a sequential test. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m^2 of gross floorspace). In the current adopted Local Plan this threshold is set at 500 m^2.

The Council does not consider that the default 2,500m^2 gross threshold provides sufficient comfort that retail development across East Devon can be controlled in terms of its impact. In common with many historic market and coastal towns, premises in East Devon town centres tend to be smaller, often single fronted but capable of combination or extension, as well as use of upper floors. In order to determine an appropriate threshold we have considered the scale of existing retail stores across the town centres in the District, particularly those stores which underpin/anchor defined centres.

In relation to convenience retail provision, there is a wide range of store sizes with many of the larger supermarkets either in edge or out-of-centre locations. Town centres generally have smaller foodstores. In many cases, the smaller foodstores provide an important contribution to the health of centres and in some cases provide an anchor role. In many cases they are also the largest units town centres and therefore proposals for similar sized stores in edge or out of centre locations are unlikely to be caught by the sequential test as no comparable vacant premises/sites will exist. Therefore, we consider that a trigger point of 500 m^2 gross for retail proposals involving the potential sale of convenience goods continues to be appropriate in the Local Plan. This should apply to new stand alone retail floorspace, proposed extensions to existing stores and applications to vary the range of goods to be sold from existing floorspace. In addition, we consider that this threshold should apply consistently across the whole of the District for both edge of centre and out of centre locations.

In respect of comparison goods retailing a similar exercise has been undertaken. There are a wide variety of unit sizes, varying from smaller units in general in the smaller town centres with a larger average size of unit in centres such as Exmouth, Sidmouth and Honiton. In out of centre locations, unit sizes tend to be large, focusing on large format bulky goods sales. Generally speaking, single comparison goods retailers do not provide a lone sole anchor to defined centres, although the range and quality of comparison goods retailers provides a very important contribution to their health and attractiveness. With such a range of retailers present in the East Devon area it is difficult to be precise over the exact scale of floorspace which could have a detrimental impact upon the health of defined centres, however given trends in the retail sector in recent years and the evolution of the retail warehousing sector, we consider that a trigger of 500 m^2 gross floorspace should also be applied to impact assessments for comparison goods floorspace. This should also apply to new stand alone retail floorspace, proposed extensions to existing stores and applications to vary the range of goods to be sold from existing floorspace. This threshold should also apply to bulky and non-bulky goods proposals and, like convenience goods uses, be applied consistently across the whole of the East Devon area for both edge of centre and out of centre locations.

The 500 m^2 threshold has been successful established for a number of years. The Council considers that it continues to strike an appropriate balance between control over inappropriate development and not becoming overly restrictive or onerous to applicants.