Advice in Respect of Policy Retail relating to Floorspace Size and Impact Assessments

21 November 2011.

Consultation Draft Policy SH1 of the East Devon Local Plan (December 2011) includes reference to impact assessments being required for proposals of 500 SqM or greater. Evidence justifying this threshold was supplied by GVA and should be read alongside other retail guidance from the consultants to the Council.

The advice received is set out below.

The implications of PPS4 Policy EC3.1(d): the identification of floorspace and location thresholds for the scale of edge of centre and out of centre proposals which should be subject to an assessment of impacts under Policy EC16.1 of PPS4. Whilst PPS4 could be superseded by the NPPF in the new year, the draft NPPF document also includes similar guidance.

Whatever the content of an adopted development plan (prepared in accordance with PPS4), Policy EC14 of PPS4 requires all retail proposals over 2,500sq m gross to be subject to the impact tests in Policy EC16.1 although once East Devon’s Local Plan is adopted all developments under 2,500sq m gross will not be required to be assessed against EC16.1 unless a local impact test threshold is set. No minimum size threshold is set for the sequential approach to site selection for new retail proposals.

Therefore, as a consequence of EC3.1(d) of PPS4, the Council must consider whether the default 2,500sq m gross threshold provides sufficient comfort that retail development across East Devon can be controlled in terms of its impact. In order to determine an appropriate threshold we consider it important to examine the scale of existing retail stores across the town centres in the District, particularly those stores which serve to 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 500sq m gross for retail proposals involving the potential sale of convenience goods should be introduced 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.

Turning to comparison goods retailing a similar exercise has been undertaken. This has found 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 floorspace of trigger of 500sq m gross 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. In addition, this threshold should 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.

We think that the 500sq m threshold strikes the right balance” between control over inappropriate development and not becoming overly restrictive in terms of ‘red tape’.

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