

Comments

Town Centre and Retail Main Issues Report (07/09/15 to 17/10/15)

Comment by	Scottish Government (Scottish Government)
Comment ID	24
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Consultation Point	Questions: Retail & Town Centre Policies (View)
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Comments

Sequential Approach and Network of Centres

The Scottish Government supports the preferred option which aligns with Scottish Planning Policy. The first alternative of increasing the sequential preference of commercial centres would not fit with the approach set out in SPP, and would not be supported by the Scottish Government.

How flexible should our approach to out of town centre retailing be? Is our preferred option correct?

Retail Outside Town Centres

The Council has set out that proposals for less than 1,000 sqm would be allowed (providing the development is not an addition to an existing shopping centre / unit). Whilst SPP directs that the town centre first approach covers retail, and the order of sequential order of preference, it also sets out that planning authorities, developers, owners and occupiers should be flexible and realistic in applying the sequential approach, to ensure that different uses are developed in the most appropriate locations. The Scottish Government accepts there should be scope for neighbourhood shopping provision at an appropriate scale, providing it does not harm existing town centres, and are content with the proposed policy approach. In terms of the larger proposals for retail outsider town centres, the policy sets out that the sequential approach applies, which is in line with SPP.

However, we would suggest **deleting the word “Any ”** from the start of the preferred option/policy, as it gives the initial impression of a more lax, non-town centre first approach.

The Preferred Option sets out that proposals over 2500 square metres will to be supported by a require retail impact assessment to demonstrate the impact of the proposal, we welcome this in providing clarity about the requirement in SPP.

Town Centre Policies

The Council has set out that its preferred option is to ensure the core retail areas in the town centres consist mainly of Class 1 Shops, and that in the wider peripheral areas of the town centres a wider

range of complimentary town centre uses should be provided. The Council should ensure that the Proposed Plan, in line with SPP, encourages a **mix of uses** in town centres to support their vibrancy, vitality and viability throughout the day and into the evening.

SPP, in response to the Town Centre Action Plan sets out the planning system should consider opportunities for promoting residential use within town centres where this fits with local need and demand. We welcome the support in the MIR's preferred option for town centre living at upper floors and in non-core areas.

Whilst the preferred option for 'Retail outsider town centres' sets out SPP's requirement for Retail Impact Assessments, we would highlight there is another requirement for assessments on the impact of different types of proposals in SPP. Paragraph 71 of SPP states "Where a **new public building or office with a gross floorspace over 2,500m² is proposed outwith a town centre, and is contrary to the development plan, an assessment of the impact on the town centre should be carried out**." The Town Centre First Principle jointly developed by Scottish Government and COSLA encourages the public sector to continue to invest in town centres and help communities thrive. The principle is about adopting an approach to decisions that considers the vibrancy of town centres as a starting point. It asks that the health of town centres features in decision making processes. It would be helpful for the Council to include in an appropriate part of the Proposed Plan a statement requiring assessments on the impact of such proposals, this would provide clarity and give the requirement the full weight and statutory status that being part of the development plan offers. This could help ensure the Council is provided with the information it needs to make on applications for proposals which could affect town centres.

Comments

Heathfield Retail Park

The preferred vision sets out that at Heathfield (an out-of centre location) shopping restrictions will be "moderately relaxed to provide flexibility to meet commercial needs in a way that will not harm Ayr town centre".

The preferred option for the Retail Park is to

"II) allow 20% of the Park's total floorspace to also sell homeware goods as well as the bulky goods mentioned above (fashion, shoes, toys and entertainment goods - e.g. DVDs - remain excluded under this provision), and that" and

that "IV) All units within Heathfield Retail Park will be allowed to sell an ancillary level of non-bulky goods, including ranges excluded under provision II) above, where the gross floor space occupied by those goods is no more than 10% of any given unit."

It is worth noting that in the South Ayrshire Proposed LDP Examination Report (June 2014) the Reporter noted "It is reasonable for the council to restrict the range of goods sold at the retail park in the interest of protecting town centres, in particular Ayr town centre." The Reporter also set out "The restriction on the type of goods that can be sold at Heathfield does not appear to have had a significant effect on the occupancy of the retail park. There is currently a good level of occupancy of the main retail units, with the exception of the former Comet store. One of the smaller units has recently been occupied and another is about to be. I find no overriding evidence to suggest that the range of goods that can be sold at this location should be expanded, with the risk that this would have an adverse impact on the vitality and viability of Ayr town centre."

As such, the current proposal to moderately de-restrict Heathfield, appears at odds with the Examination Report, from just last year, although we would accept there is an issue of scale as to the amount of floorspace that could be used to sell other types of non-bulky goods.

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Do you have any additional comments to make not covered by any of the questions?	Yes

Please add comments below

The Scottish Government welcomes the place based / graphic approach used in the MIR as a means to support stakeholder understanding of the options.

This is the first topic specific LDP relating to town centres and retailing. It is unusual as the topic is mainly found alongside other policy topics within a comprehensive LDP. Given this context, we would not encourage supplementary guidance associated with this LDP as it would add further complexity to the development plan landscape.

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