Bristol City Centre Retail Study Explanatory Note – July 2014

Introduction

1.1 In September 2013 Bristol City Council commissioned DTZ to carry out a retail study to inform the preparation of the emerging Bristol Central Area Plan. The intention to carry out a study was referred to in the adopted Bristol Core Strategy.

1.2 The purpose of the study was to assess the qualitative and quantitative needs for city centre retail development over the period to 2026; how such needs should be accommodated; and what other improvements are needed to enhance the status and performance of the city centre.

Context for the study

2.1 The context for the study was provided by the Bristol Core Strategy adopted June 2011 and the National Planning Policy Framework March 2012.

2.2 The Bristol Core Strategy is the primary document in the city's Local Plan. It sets out strategic development policies for the city. The vision section of the document says:

'The city centre will grow; its regional, national and international role will be strengthened. Building on the success of Cabot Circus and Broadmead improvements, the city centre will enhance its status as the foremost shopping and entertainment centre in the South West'

2.3 Core Strategy Policy BCS2 says:

'Bristol City Centre's role as a regional focus will be promoted and strengthened. Development will include mixed uses for offices, residential, retail, leisure, tourism, entertainment and arts and cultural facilities.'

2.4 The National Planning Policy Framework indicates that local plans should meet objectively assessed development needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. With regard to ensuring the vitality of town centres it says that planning policies should be positive, promote competitive town centres environments and set out policies for the management and growth of centres over the planning period.

2.5 The NPPF says Local Plans should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. It also says local plans should define a network and hierarchy of centres. This is addressed by the Bristol Core Strategy which sets out a hierarchy in Policy BCS7 with Bristol City Centre at its head.

Response to study recommendations

3.1 In Chapter 11 'Conclusions and Implications for Strategy' the Bristol City Centre Retail Study sets out a number of implications including recommendations for actions Bristol City Council could take. **Appendix 1** of this explanatory note explains the response made by the Council to the recommendations. Most of those responses relate to the policy approaches in the Bristol Central Area Plan. Other responses have been noted to inform the Council's other activities and some recommendations have not been taken forward in the light of changed circumstances since the study reported.

Strategic impacts of study findings and impact on other areas

4.1 A representation was received from South Gloucestershire Council in April 2014 regarding the duty to cooperate (Planning and Compulsory Purchase Act 2004 Section 33A). In the representation reference is made to the relationship of Bristol City Centre with the out-of-centre retail facility at The Mall, Cribbs Causeway which is in South Gloucestershire.

4.2 In response to previous representations Bristol City Council had explained to South Gloucestershire Council that the issues they had raised regarding the Bristol Central Area Plan and the Bristol City Centre Retail Study 2013 did not have strategic implications in terms of the duty to cooperate. This is set out in the Section 33A Statement of Compliance paper[1] which accompanied the Publication Version of the Bristol Central Area Plan. However, in response to the most recent representation Bristol City Council requested DTZ, the authors of the retail study, to provide some further information and explanation regarding the study and the implications of the policies in the Bristol Central Area Plan on neighbouring areas. DTZ's commentary is included at **Appendix 2**.

4.3 As DTZ's comments clarify, the policies in the Bristol Central Area Plan do not have strategic implications across local authority boundaries. They do not depend upon Bristol City Centre increasing its market share of catchment area expenditure and so would not have potential adverse impacts on other centres.

[1] http://www.bristol.gov.uk/page/planning-and-building-regulations/bristol-central-area-plan

Appendix 1 – Response to Retail Study recommendations

The Bristol City Centre Retail Study was published in June 2013. The document included a number of conclusions and recommended actions – see section 11 of the study. The Bristol City Council's response to those recommendations is set out in the table below:

	Report's Conclusions/recommendations	**Council's Response**
	Stage 1	
1	Retail capacity forecasts for Bristol City Centre show that there is sufficient population and expenditure growth to support additional comparison goods floorspace, including a major retail-led development, in the medium to long term. This floorspace should be directed towards the prime retail area i.e. the Bristol Shopping Quarter.	The capacity forecasts are noted and provide an encouraging context for the planning of Bristol City Centre and potential for beneficial investment. It is also noted that the forecasts do not constitute targets for the reasons set out in the study (paragraph 5.3). Bristol Core Strategy Policy BCS2 says that the city centre's regional focus will be promoted and strengthened and that development will include mixed uses including retail. The BCAP Publication Version has focussed major retail development on Bristol Shopping Quarter but there are proposals for complementary retail development in other retail locations within the city centre, consistent with the study's findings (Policy BCAP13).
2	Bristol City Centre's spatial pattern of market shares is clearly influenced by the presence and offer of the out-of-centre shopping centre at The Mall. Any future growth in floorspace at The Mall, if not balanced by new retail development in Bristol City Centre, could potentially have significant adverse impacts upon the vitality and viability of Bristol City Centre.	The comments on the influence of the out-of-centre Mall at Cribbs Causeway on Bristol City Centre's spatial pattern of market shares are noted (the planning status of The Mall has been confirmed in the South Gloucestershire Core Strategy December 2013 – see conclusion 18 below). The Bristol Central Area Plan sets out a positive framework to ensure Bristol City Centre remains a competitive city centre environment, rather than declining relative to other centres.
3	Bristol City Centre has a strong clothing and footwear offer, reflected by its market share in this category of comparison goods (relative to The	The relative strengths of Bristol City Centre are noted.

	Report's Conclusions/recommendations	Council's Response
	Mall). The city centre also performs well in terms of attracting catchment area expenditure on household textiles, and out-performs The Mall in all other categories of comparison goods. Nevertheless The Mall is a substantial competitor to Bristol City Centre for comparison goods retailing.	The planning approach to The Mall was confirmed in the South Gloucestershire Core Strategy adopted in December 2013 (see conclusion 18 below). Whilst it is noted that it is a competitor to Bristol City Centre for comparison good retailing, the policies in the NPPF ('Ensuring the vitality of town centres') ensure that any proposals for out-of-centre retail development take account of the impacts on existing centres. The West of England Duty to Cooperate schedule includes Retail Development and Centres as a theme and indicates as an issue *"To determine the future role of The Mall/Cribbs Causeway and the implications of retail expansion on town centres within neighbouring authorities."* This consideration of role will be carried out in connection with the review of the South Gloucestershire Core Strategy/Local Plan.
4	The promotion of the Bristol Shopping Quarter marketing campaign should continue; however consideration should be afforded to a wider city centre campaign which promotes both multiple and independent businesses in a joined-up manner.	The conclusions are noted. The results of the study have been shared with Destination Bristol which has a key role in the marketing of Bristol Shopping Quarter.
5	There is action needed to reduce vacancy rates in the city centre, including the Bristol Shopping Quarter. This area, unsurprisingly, is the focus for the majority of 'latent' retailer demand in the city centre. The provision of larger and more flexible retail floorspace is important in this respect, possibly through the amalgamation of smaller units within the city centre's prime retail area.	The Council monitors vacancy rates in the city centre and has pursued initiatives to address vacancies and encourage temporary uses. The policies in the Bristol Central Area Plan reflect the requirement for larger more flexible units (Policy BCAP 36). A development is currently under construction in Union Street in Bristol Shopping Quarter which will refurbish, amalgamate and extend retail units.
6	In the Cabot Circus/ Broadmead area, the existing food and drink offer lacks an evening economy focus and needs	The policies in the Bristol Central Area Plan allow for the development of evening economy and other supporting

	Report's Conclusions/recommendations	Council's Response
	to be supplemented by a sufficient critical mass of entertainment, leisure and community facilities. This would serve to increase footfall and dwell time in the area, and improve the wider experience for shoppers and other users; one cannot visit a leisure attraction over the internet. The Council should consider the pedestrianisation of The Horsefair and Penn Street in Cabot Circus/ Broadmead.	uses within Bristol Shopping Quarter (Policy BCAP36). Leisure use frontages have been defined within Bristol Shopping Quarter and in Nelson Street and Lewins Mead (Policy BCAP19). The suggestion of pedestrianising The Horsefair and Penn Street will be taken into account in future proposals for traffic management. The Bristol Central Area Plan refers to proposals to reduce the levels of traffic entering the heart of the city centre (paragraph 7.5).
7	Queen's Road/ Park Street, by virtue of its function and retail offer, is considered a genuine alternative destination to the prime retail area of Broadmead/ Cabot Circus. To facilitate further improvements, the area would benefit from better traffic management and better amenities for shoppers and other users.	The role and strategy for this area is set out in Policy BCAP13. These recommendations will be taken into account in any public realm or traffic management proposals affecting the Queen's Road/Park Street area.
8	St Nicholas Market – the main attraction in the Old City/ Baldwin Street/ Victoria Street area – would benefit from refurbishment and initiatives to improve its vibrancy and attractiveness. The wider area should be promoted as a historic shopping and leisure area to reflect its balance of daytime and evening economy activities.	These conclusions have been taken into account in the Bristol Central Area Plan's policies for Old City (BCAP44). St Nicholas Market is acknowledged as a major attraction (as supported by stakeholder comments during plan preparation) and these recommendations will be taken into account in any proposals for the Market.
9	Independent businesses at Christmas Steps/ St Michaels should continue to be supported and fostered; thus it should be promoted as a speciality shopping and catering area, which complements rather than competes with other retail areas. Improvement action should focus on better linkages with Nelson Street and the prime retail areas.	This recommendation has been taken into account in the Bristol Central Area Plan's policies for Christmas Steps Arts Quarter (Policy BCAP13). A primary shopping frontage has been proposed to acknowledge the strong representation of speciality shopping and to support the identified character of the area (Policy BCAP16).
10	Harbourside is and should remain the city centre's main destination for leisure activities. It has almost no retail attractions and does not therefore	The Bristol Central Area Plan proposes leisure frontages in this area, consistent with these recommendations (Policy BCAP19).

	Report's Conclusions/recommendations	Council's Response
	function as a retail area. The focus should be on strengthening the existing mix of entertainment, leisure and community facilities, in addition to increasing footfall through the area (particularly in the evenings).	
11	Old Market should be identified as a specialist local centre to reflect its evening economy role and limited retail offer. In order to address the high proportion of vacant shops, improvement action may look at greater flexibility for change of use.	The specialist nature of Old Market is acknowledged in Policy BCAP13 in Bristol Central Area Plan. A Neighbourhood Development Plan is in preparation for Old Market Quarter.
12	The Council should promote Stokes Croft as a specialist shopping and leisure area for independent businesses. Whilst the area has a well-known creative identity, it would benefit from environmental improvements and greater flexibility for a wider range of uses to address vacancy rates. Bringing the two large vacant buildings (namely the Carriageworks and Westmoreland House) back into beneficial use will be vital to ensuring the long term health of Stokes Croft.	The specialist nature of Stokes Croft is acknowledged in Policy BCAP13 in Bristol Central Area Plan and the approach to the area is considered in Policy BCAP45 The Approach to St Paul's and Stokes Croft, including the potential for a Local Development Order. An opportunity site has been identified at the Carriageworks/Westmoreland House (SA505).
13	Some city centre retail areas are isolated and in need of better pedestrian linkages to the wider city centre. Improvement action should seek to address key routes (i.e. Nelson Street) and bring forward key opportunity sites (i.e. the St Mary Le Port site) in order to improve connectivity to and from the prime retail areas. In addition, the Council may wish to have further regard for the pedestrianisation of some parts of the city centre. Emerging proposals for car free Sundays in city centre streets should be encouraged and their impacts monitored.	These recommendations will be taken into account in proposals for traffic management and public realm in Bristol City Centre. The Bristol Central Area Plan has a vision of thriving, connected neighbourhoods. Key routes are identified in site specific proposals. A number of successful car-free 'Make Sunday Special' events have already been held, including a water slide installation on Park Street which drew thousands of spectators.
14	A holistic approach should be taken to walking, cycling and public transport in the city centre; to facilitate regeneration of the less prime development sites, and better link the	These matters will be taken into account in future versions of the Public Realm and Movement Framework and in the implementation of individual

	Report's Conclusions/recommendations	Council's Response
	more isolated retail areas in the city centre to each other and the main sources of shoppers.	schemes.
15	The city centre has a strong leisure offer, focused particularly at Harbourside. Any opportunities to enhance the evening economy offer in the Bristol Shopping Quarter should also be explored by the Council. Our assessment of leisure operator interest and requirements demonstrates that demand from this sector is limited in the light of market conditions and existing supply in Bristol City Centre and surrounding areas.	The policies in the Bristol Central Area Plan allow for the development of the evening economy and other supporting uses within Bristol Shopping Quarter (Policy BCAP36). Leisure use frontages have been defined within Bristol Shopping Quarter; Nelson Street and Lewins Mead; and Harbourside (Policy BCAP19).
	Stage 2	
16	The most prominent development opportunity for large-scale retail (and potentially leisure) development is Broadmead / The Horsefair, adjacent to Cabot Circus. This site should be actively promoted as such by the Council and its partners. It would make a substantial contribution towards accommodating forecast capacity for additional comparison goods floorspace in the medium to long term, and regenerating the now dated and relatively unattractive Broadmead area.	The site within the existing Broadmead shopping area is specifically identified for major retail–led development and mixed uses in the Bristol Central Area Plan (Policy BCAP36 Bristol Shopping Quarter, site KS02). The policy provides for a range of units, improved routes between shopping frontages and improvements to the pedestrian environment. The Council will work with development partners in bringing forward proposals for the medium term.
17	Achieving this next phase of regeneration of the Bristol Shopping Quarter will require positive planning by the City Council to articulate a vision and strategy for the area and allocate sites for redevelopment; followed by commitments and action to bring forward sites in and on the edge of Broadmead for retail-led redevelopment in partnership with other landowners and developers.	Bristol Central Area Plan Policy BCAP13 articulates a positive strategy for the approach to retail in the city centre as a whole including Bristol Shopping Quarter. Policy BCAP36 sets out the detailed approach to development in Bristol Shopping Quarter, including the identification of development sites (KS02 and KS03).
18	It will also necessitate the City Council working with neighbouring local	The planning approach to The Mall is addressed in the South

	Report's Conclusions/recommendations	Council's Response
	authorities to control and strictly limit out-of-centre retail development; in particular expansion of The Mall at Cribbs Causeway, which would put at risk or substantially defer achievement of the Council's strategy for further regeneration of the Bristol Shopping Quarter. To that end, there is now and will be in the next few years only limited demand from the prime national multiple retailers, of the type that are essential 'anchors' to any substantial new retail development. If such retailers are attracted to an early expansion of The Mall, there is a significant risk that they will not locate in Bristol City Centre later on.	Gloucestershire Core Strategy which was adopted in December 2013[2]. It is identified as out-of-centre (Policy CS14) and earlier proposals for major expansion were not included in the adopted plan at the recommendation of the Core Strategy Inspector[3]. It is, therefore, not necessary or appropriate to take further action on this recommendation having regard to the policies for town centres in the National Planning Policy Framework. However, the potential risks arising from out-of-centre retail development for investment in Bristol City Centre are noted. In accordance with the National Planning Policy Framework (paragraph 23) the Bristol Central Area Plan promotes a competitive city centre that provides customer choice and a diverse retail offer. The West of England Duty to Cooperate schedule includes as a theme "Retail Development and Centres" and includes as an issue "To determine the future role of The Mall/Cribbs Causeway and the implications of retail expansion on town centres within neighbouring authorities."[4] This relates to the future review of the South Gloucestershire Local Plan. It is expected that the consideration of the role referred to will be informed by evidence prepared at the time such a review is undertaken.
19	The other development opportunity sites in the city centre are considered	The Bristol Central Area Plan's policies for High Street, Wine Street and Castle

[2] See SG Core Strategy Policy CS14 http://www.southglos.gov.uk/Pages/Topic%20Pages/Planning%20Transport%20-%20Strategic%20Environment/Planning%20Environment/Core-strategy.aspx

[3] See SG Core Strategy Inspector's Report paragraphs 171 to 184 http://www.southglos.gov.uk/Documents/South%20Glos%20Core%20Strategy%20-%20Inspectors%20Report.pdf

[4] See West of England Duty to Cooperate Schedule http://www.westofenglandlep.co.uk/transport-and-infrastructure/duty-to-cooperate-planning

	Report's Conclusions/recommendations	Council's Response
	less prime and more appropriate for a mix of uses (i.e. not predominantly retail), and would therefore make a more limited contribution towards accommodating forecast retail capacity. However, these sites – if brought forward – would certainly help to improve the future vitality and viability of the city centre as a whole.	Park; Nelson Street and Lewins Mead; and Bristol Temple Quarter set out approaches to complementary retail development in those locations (Policy BCAP13).
20	It will also be necessary to plan for an appropriate scale and form of retail floorspace at Bristol's existing (or new) town/district/local centres in accordance with the sequential approach. Whilst likely to make only a limited contribution towards accommodating forecast retail capacity, such centres are higher priority locations for new retail development (i.e. in preference to out-of-centre locations).	The Bristol Core Strategy identifies a retail hierarchy for the remainder of the city showing 10 town centres, 9 district centres and 27 local centres. The boundaries for these areas are shown in the Site Allocations and Development Management Policies Local Plan which also identifies sites for development within these centres.
21	The Council should take into account, and apply, the general principles set out in Chapter 10 when designating primary and secondary frontages within each of the 7 Retail Areas.	The approach has been noted and taken into account in identifying the primary and secondary shopping frontages in the Bristol Central Plan (Policies BCAP16 and 17).

Bristol Central Area Plan (BCAP) – Publication Version, February 2014

DTZ Briefing Note

2 June 2014

1. This Note has been prepared in the light of the 'Duty to Cooperate' objections to the BCAP, as received by Bristol City Council (BCC) from South Gloucestershire Council (SGC) and the owners of The Mall at Cribbs Causeway. We have been asked to consider whether the development/use of land proposed in Policies BCAP13, 14 and 36 in particular would have a significant impact on at least two planning areas.

2. In preparing this Note, we have considered the objections; and have focused on how the BCAP has responded to the findings and recommendations of our Bristol City Centre Retail Study 2013 (the 'Retail Study'). We have also considered whether the the scale and nature of new retail development in the city centre which could result from policies in the BCAP would be likely to have any significant adverse impacts on other designated centres, or on The Mall at Cribbs Causeway (as an out-of-centre retail location). We consider that the policies would not be likely to cause a significant adverse impact on South Gloucestershire, for the following reasons:

   a) Both objections are in our view overly concerned with the approach and findings of the Retail Study – which forms the retail evidence base to the BCAP – rather than the policies of the BCAP itself. It was appropriate for the Retail Study to have regard to The Mall; given the dynamics of the retail market and the fact (confirmed by the 2012 household interview survey) that its catchment area overlaps with that of Bristol City Centre to a substantial degree. However (as indicated below), this does not mean that the BCAP policies would result in any significant impact on any designated centre outside Bristol, or on The Mall.

   b) Both objectors are correct that the Retail Study models 2 scenarios for new retail development in Bristol City Centre. However, they are incorrect to assert or imply that forecast retail capacity arising from Scenario 2 of the Retail Study has been assumed or adopted by BCC in formulating Policy BCAP36. The BCAP does not adopt any specified level of forecast retail capacity (i.e. growth) arising from the findings of the Retail Study; and does not assume that any transfer of market shares from The Mall to Bristol City Centre will be required to achieve the aims of Policy BCAP36.

   c) Whilst the Retail Study includes in-principle support for growth in Bristol City Centre in the light of forecast retail capacity and identified qualitative needs, and indicates where and how such growth could be accommodated, it does not recommend a specific quantitative growth scenario for BCC to adopt in formulating the policies of the BCAP.

   d) In addition, the BCAP's site allocations for new retail development do not prescribe a particular quantum of floorspace for them to achieve (in the absence of up-to-date development feasibility studies and/or because this is not the purpose of the BCAP; and in recognition of the caveats about the capacity forecasts in paragraphs 4.3 and 4.5 of the Retail Study). Thus there is no direct reference in the BCAP to the retail capacity forecasts in the Retail Study: rather, the site allocations build upon the provisions of BCC's adopted Core Strategy (to which SGC did not object) with the added benefit of an up-todate retail evidence base, i.e. the Retail Study.

e) Even under Scenario 1 in the Retail Study (which assumes that the 2012 survey-indicated market shares of Bristol City Centre, other designated centres and The Mall remain unchanged throughout the forecasting period to 2026), there would be capacity in Bristol City Centre for about 29,950 sq m net retail sales area of additional comparison goods floorspace by 2021, rising to about 48,950 sq m net by 2026, if forecast trends occur. Therefore under Scenario 1 (in which there would be no adverse impact on any designated centre outside Bristol or on The Mall), there is clearly sufficient forecast expenditure growth in the medium (i.e. 2021) to long (i.e. 2026) term to support substantial comparison goods retail development in Bristol City Centre – as envisaged by the positive planning and site allocations for new retail development in the BCAP.

f) Scenario 2 is exploratory (see paragraph 5.8 of Retail Study) and assumes a theoretical upper limit growth transfer scenario from The Mall to Bristol City Centre, resulting in 'outline' retail capacity forecasts (see paragraph 5.4 of the Retail Study). In any event, even the Scenario 2 forecasts – were these to be realised in practice – allow for substantial expenditure growth at The Mall (i.e. 2% per annum growth in the sales density of existing comparison goods floorspace) from 2012 onwards (paragraph 4.36).

g) Scenario 2 would be compliant with the 'town centres first' approach set out in the NPPF given that The Mall is not a designated centre. As stated in SGC's adopted Core Strategy (paragraph 9.26) ; *'Until this review* [into potential additional retail floorspace provision at The Mall] *is completed, any additional retail floorspace provision in out-of-centre locations* [including The Mall] *will be considered against national policy guidance in the NPPF having regard for the sequential approach and retail impact tests.'*

h) Other than The Mall, Scenario 2 of the Retail Study does not assume the transfer of market shares to Bristol City Centre from any designated centre in South Gloucestershire (or elsewhere) and is not therefore predicated on impacts to any other centre.

i) Notwithstanding the above explanation of the Scenario 2 forecasts in the Retail Study, the BCAP does not adopt such forecasts and is not therefore based on a requirement to transfer growth from The Mall to Bristol City Centre. It will therefore not be likely to result in any significant adverse impacts on any designated centres outside Bristol, or on The Mall.

j) The reality is that the constraints of site availability in the Bristol Shopping Quarter and elsewhere in the city centre, and the emphasis in Policy BCAP36 on a wider range of uses other than just retail, will have the effect of limiting the scale and nature of new prime retail development which can be achieved. Within those constraints, the recommendations in the Retail Study and the policies in the BCAP are aimed at allowing proportionate growth and investment ,thus preventing the decline of the city centre in retail terms relative to competing centres – not at outgrowing other centres and The Mall to a degree which would have significant adverse impacts upon them. Policies BCAP13, 14 and 36 are therefore aimed at retail-led regeneration, and ensuring the vitality of the city centre in the long term, in accordance with the NPPF; rather than achieving any step change in hierarchical terms, with adverse impacts on other designated centres or The Mall.

3. We therefore conclude that the retail policies in the BCAP would not be likely to result in a significant impact on any other planning areas.