

BRISTOL LOCAL PLAN REVIEW

INDEPENDENT EXAMINATION

MATTER 9, ISSUE 9.1

**WHETHER THE CENTRE NETWORK AND HIERARCHY CONTAINED IN
POLICY SSE1 IS JUSTIFIED, IN ACCORDANCE WITH NATIONAL POLICY AND
SUFFICIENTLY COMPREHENSIVE**

POSITION STATEMENT

ON BEHALF OF

CPG (BRISTOL) LTD

ID: 286





CPG (Bristol) Ltd
Matter 9, Issue 9.1, Q9.1(b)

Contents

1 Introduction	3
2 Issue 9.1, Q9.1(b)	4

RA Ref: CONS0015
LPA Ref: -
Office Address: Number One
Queen Square Place
Bath
BA1 2LL
Telephone: +44 (0)1225 433675
Date of Issue: February 2025



1. Introduction

- 1.1 This Position Statement sets out a brief response on behalf CPG (Bristol) Ltd to the Inspectors' questions in relation to Matter 9.1, and in particular Q9.1(b) which reflects the focus of CPG's representations to the Regulation 19 Plan.
- 1.2 This Hearing Statement should be read in conjunction with the written representations already made on behalf of CPG (Bristol) Ltd to the Pre-Submission Consultation on the Bristol Local Plan Review.

2. Issue 9.1, Q9.1(b)

Is the Centre Network and Hierarchy contained within the policy justified, in accordance with national policy and is it sufficiently comprehensive? Having regard to the Council's proposed main modification for Policy SSE1 proposing a change to this part of the policy in response to PQ118, is this necessary for soundness?

- 2.1 The Government is clear in its objective to 'support' the role that town centres play at the heart of local communities, by taking a 'positive approach' to their growth, management and adaptation¹. To this end it requires planning policies to, *inter alia*:

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. ...²

- 2.2 The NPPF definition of a 'town centre' is broad and generic comprising 'an 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'³. 'Primary Shopping Area' is a 'defined area where retail development is concentrated'⁴. 'Main town centre uses' are defined as 'retail development' and a range of other commercial uses now broadly encompassed by Class E of the Town and Country Planning (Use Classes) Order 1987 (as amended)⁵.

¹ NPPF, para. 86

² Ibid, para 86(a)

³ Ibid, Annex 2: Glossary, p.74

⁴ Ibid, Annex 2: Glossary, p.72

⁵ Ibid, Annex, 2: Glossary, p.69

- 2.3 A 'town centre' can therefore comprise any area where retail development is concentrated and/or areas occupied by main town centre uses. There are no stipulations regarding its form, layout, or scale of units by which it is comprised. Any concentration of town centre uses that performs a role at the heart of local communities is therefore capable of being defined as a town centre on a local authority's policies map, including formats that may be characterised as retail 'parks'. Since they comprise concentrations of retail and other main town centre uses, they fit within the NPPF definition.
- 2.4 The Bristol Local Centres Study (BLCS)⁶ confirms the 'key role' that town centres outside the city centre perform in meeting the community's day-to-day needs, with "*... some also providing an additional diverse offer which encourages additional visits, increases dwell times, and a general desire to spend time in those centres*"⁷.
- 2.5 The volatility and uncertainties prevailing in the retail market in the post-pandemic era, are acknowledged in the BLCS. That is partly a hangover from the pandemic, but the bigger impact which has become indelibly embedded in consumer behaviour is what is referred to as 'special forms of trading', or 'internet' sales:

*... Experian estimates that special forms of trading will account for well over a third of comparison goods expenditure and almost a quarter of convenience goods expenditure at 2031. ...*⁸

*The ongoing popularity of internet shopping continues to have clear implications in respect of the viability of some 'bricks and mortar' retailers. ...*⁹

- 2.6 There are very few 'bricks and mortar' retail schemes which would have been permitted under the prevailing 'town centre first' policy approach with a predicted trade diversion impact in excess of 33%, as is the projected impact of online retailing by 2031. As has already been experienced in many locations across the country, and is endorsed by the BLCS, internet sales are therefore an existential threat to bricks and mortar retailing and require a change in mindset. With the decline in investment in new retail floorspace, the priority threat is no longer the impact of out-of-centre retailing on catchment area town centres. Rather it is the impact

⁶ EVECO2_Bristol Local Centres Study, Final Report, November 2023

⁷ EVECO2_BLCS, para. 1.14

⁸ Ibid, para. 2.16

⁹ Ibid, para. 2.17

of the loss of expenditure to internet platforms on the continued availability of physical retailing (both within and without existing centres) to local communities.

- 2.7 It is acknowledged in the BLCS that retail parks, such as Imperial Park, play an important role in performing a key retail and leisure destination for residents in the surrounding wards¹⁰. Notwithstanding acknowledgement of this key role, the retail parks are construed as a potential threat to existing, designated centres, with the recommended policy approach being to reduce the threshold at which impact assessment is required, thereby increasing the potential planning uncertainties and risks to intending investors in bricks and mortar retailing and other town centre uses in established locations. This would seem to be an imprudent approach under the prevailing circumstances, and which necessitates a smarter response than slavishly seeking to protect a centre network and hierarchy established under the very different retail environment of previous local plan periods, and which has now changed for ever.
- 2.8 In a similar manner to which Imperial Park plays an important role in performing a key retail and leisure destination for residents in the surrounding ward, so too does the Eastgate Retail Centre. It provides a range of important retail and other town centre facilities for the neighbouring wards including convenience goods (M&S Food) chemist goods and pharmacy (Boots), pet supplies (Pets at home), and car and cycle supplies (Halfords). In addition, health and fitness (PureGym / Jumpin Fun) and fast food outlets (Burger King / KFC) all provide for a local catchment as well as trade drawn from a greater distance by the, more recent, IKEA store.
- 2.9 The important local community role performed by the Eastgate Retail Centre has been acknowledged through planning applications for its adaptation and change. In referring an application to remove one of the restrictive conditions to Committee, the Ward Member's reasoning was stated as follows in the Committee Report:

*The councillor considers Eastgate retail park as **an important retail amenity for the local residents in Lockleaze and we need it to adapt and be viable for the future, able to attract good companies and provide good local employment. It should not be regarded as an 'out of town' shopping centre as it is in a residential area and***

¹⁰ Ibid, para. 11.39



improving the offer here would not impact detrimentally on Cabot circus or other designated shopping areas.¹¹

The officer's report also records that the second Ward Member commented that Councillors are keen to sustain Eastgate as a retail centre given the lack of provision in the area, and recognise that small scale retail parks of this nature may be under particular pressure.

- 2.10 The evidence in the BLCS also confirms the importance of the adjacent Tesco Extra store in the city's convenience retail offer, which is identified as the main food shopping destination which attracts the highest level of trips and expenditure¹². The propensity for linked trips and for the Eastgate Retail Centre in conjunction with the Tesco Extra Store to function as a destination that caters for a wide range of day to day shopping needs of the surrounding communities, is therefore considerable.
- 2.11 As submitted in representations to the Regulation 19 Plan, the Eastgate Retail Centre is within very close proximity to the designated district centre at Stapleton Road, with good accessibility between the two locations, especially pedestrian and cycle connectivity. Weaknesses of the Stapleton Road District Centre identified through the customer surveys include a need for improved range and quality of the retail offer (including more clothing, footwear and household goods) and better parking¹³.
- 2.12 Given the physical constraints and linearity of the existing Stapleton Road centre, there are limitations on the extent to which it can provide the clean and expansive floorplates required by modern retailers, and which is reflected in the high vacancy rate in excess of the national average¹⁴, and its poor viability score (ranking 11th of the 13 town/district centres)¹⁵. The imperative to adapt to the contemporary retail environment, by integrating fulfilment of online orders through regular stores, requiring an accessible location (including proximate parking) and a presentation that provides for an attractive customer experience, is again reflected in the BLCS¹⁶. Inability to deliver these imperatives means a sub-prime location where significant investment is unlikely to be made.

¹¹ Application ref. 16/01193/X, Officer's Report to Development Control Committee, 28 September 2016 (emphasis added)

¹² Ibid, para. 7.18

¹³ Ibid, p.33, Tables 4.9 – 4.11

¹⁴ Ibid, Table 6.1 and para. 6.68

¹⁵ Ibid, Table 5.2

¹⁶ Ibid, para. 2.17

- 2.13 The Eastgate Retail Centre should therefore be construed as an asset and an opportunity rather than a threat. First, and foremost, it provides a physical retailing destination within the city, fulfilling both an important local function for the day to day needs of the surrounding community, as well as spinoff trade from linked trips by customers drawn to the location by IKEA, comprising expenditure that would otherwise be made outside the city.
- 2.14 It also has the potential to sustain the adjacent Stapleton Road District Centre, again through linked trips by customers drawn to the location who would otherwise have no reason to be there. In effect, it offers an opportunity for investment in clean, modern floorplates that will function as a destination, and through the potential for trip linkage, will contribute spinoff trade for the smaller, independent operators in the adjacent Stapleton Road District Centre. In the face of the exponential rise in online competition, it should therefore be construed as complimentary rather than a threat.
- 2.15 The site also forms part of a wider commercial area comprising business and industrial uses, which has developed organically over many decades. It therefore functions as a place where people work, live and shop.

- 2.16 There are precedents elsewhere for the incorporation of a retail park as part of a more traditional district centre to sustain and enhance the town centre offer by the provision of a scale and quality of floorspace that could not otherwise be provided. An example is the Exe Bridges Retail Park in Exeter (see right) where a retail park to the east of the Railway Line has been incorporated as part of the designated St Thomas District Centre (shaded green), and co-exists in a complimentary relationship with the more traditional centre to the west. The retail park hosts a number of similar occupiers to the Eastgate Retail Centre, including M&S Food, Boots and Next (the latter having formerly occupied the M&S Food unit at Eastgate). The relationship is similar to the current circumstances in physical and trading terms.



2.3: St Thomas District Centre S1, S3, S5



- 2.17 The Eastgate Centre therefore performs an important role at the heart of the local community in which it is located. It provides important local shopping and leisure facilities that cater for everyday needs, and critically provides a physical presence for those who are either unable, or prefer not, to shop online. As such, it nurtures inclusivity and equality of opportunity. In providing local leisure facilities it also contributes to nurturing healthy lifestyles. The range of local shopping and leisure facilities also means that it is likely to nurture social interaction.
- 2.18 The role and reach of the Eastgate Centre is consolidated by the adjacent Tesco Extra store, which the Council's evidence base confirms to perform a key role in the community's main food shopping activity. The presence of the IKEA store means that the location provides an additional diverse retail offer which encourages additional visits, increases dwell times, and a general desire to spend time in the locality. The additional role that some physical retailing destinations perform is acknowledged as a positive in the BLCS¹⁷.
- 2.19 The NPPF acknowledges the imperative that physical retail destinations are allowed to grow and diversify. It also acknowledges the dynamic nature of the retail and leisure industries, which reflects the imperative for operators and developers to be able to proceed at speed and with certainty. This ability is currently fettered at the Eastgate Retail Centre by its policy status as an out-of-centre development, meaning that all but the most minor of changes (to floorspace and existing restrictions) are fettered by the requirement for sequential and impact tests. That is a risk, and therefore a disincentive, to operators and investors, and augers against the ability to be responsive to rapid changes in market circumstances.
- 2.20 The current market circumstances, and in particular the continuing exponential rise in online retailing at the expense of physical destinations, necessitate a change mindset to the application of policy, particularly in relation to established retail destinations that perform an important role for their local communities. As cited earlier, the greatest threat is no longer the impact of out-of-centre retailing on established centres. Rather it is the impact of internet platforms on bricks and mortar retailing, and therefore the availability of the physical retailing resource within urban areas.

¹⁷ See para. 2.4 above



- 2.21 Given these circumstances, which constitute an existential threat to bricks and mortar retailing, particularly in sub-prime locations, it is imperative under a continuing 'town centre first' policy approach to take a much smarter approach to the designation of centres. Any established location that performs an important role in providing a physical destination for town centre goods and services (including leisure), should be considered for designation as a town centre in order to provide the flexibility for them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, and in particular the existential threat from online platforms.
- 2.22 The evidence base does not indicate that proper and balanced consideration has been given to the designation of additional town and district centres based on established retail locations and destinations, and in particular the four retail parks that are identified in the BLCS which perhaps do not fit with the traditional perception of a 'town centre'. They simply seem to be rejected as out-of-centre developments that are potential threats to established centres already designated in the hierarchy, and in particular the city centre. That is an unjustifiable position given that none of the locations concerned is of the areal extent to deliver the scale and range of town centre floorspace and uses that could begin to compete with the city centre.
- 2.23 It is germane that the Eastgate Retail Centre has been trading for nearly 40 years, with no evidence that it has occasioned harm to the city centre. On the contrary, the city centre has witnessed significant investment during that period, in particular through the development of Cabot Circus. It is therefore an established centre that has been performing an important role in Bristol's retail hierarchy for nearly four decades.
- 2.24 The dismissive approach is reflected in the Council's response to CPG's representations to the Regulation 19 Plan which rejected the suggested designation of the Eastgate Retail Centre as a town or district centre simply on the basis that "*the retail park is not considered to be a centre*"¹⁸. That does not provide a justified basis supported by robust evidence, or indeed the definitions in the NPPF, for rejecting the representor's submissions, and reflects an intransigence of mindset that fails to respond to current market circumstances. On the contrary, it provides no justification whatsoever¹⁹.

¹⁸ Brief responses to main issues raised in representations to Local Plan Publication Version (November 2023), Bristol City Council, July 2024, p.146

¹⁹ Given the evidence at paragraph 2.9 above it is clear that there are dissenting views within the Council on this point, and that it functions as a vital local shopping facility for those who are part of the local community and understand how it is perceived and used



- 2.25 The evidence from neighbouring authorities, in particular South Gloucestershire, is that new town centres to serve strategic growth areas tend to assume the form and layout typically associated with a retail park, anchored by a large format foodstore and with large format units and associated food and beverage outlets and extensive adjacent, surface-level parking (for example the Willowbrook Centre comprising the town centre for Bradley Stoke and the Emersons Green District Centre). This endorses the fact that it is such formats that are best suited to contemporary bricks and mortar retailing, and are likely to be most resilient to the current challenges facing the industry. However, without an adjustment in mindset and transition to a more flexible policy approach, the demise of physical retailing is likely to extend further than would be the case due to online competition alone, and to reach into otherwise optimal locations in retailing terms.
- 2.26 On-line retailing delivers little, if any, fiscal or other benefits for local authorities or local communities. It does not pay rent or rates on business premises, nor does it generate investment in the physical fabric with associated employment of local labour. It does not generate spin-off trade for other businesses through linked trips, and is therefore more likely to contribute to a spiral of decline. Whilst some uses, such as health and fitness studios, cannot be superseded by online alternatives (although the growth of home exercise equipment and on-line programs and workouts may reduce the demand), without associated retail and related town centre uses to support the retail parks and other locations of which they tend to form a part, they are likely to decline in their availability, to the detriment of the community's health and well-being.
- 2.27 The distillation of all the foregoing considerations is therefore that the established retail parks in Bristol, and in particular the Eastgate Retail Park, perform a vital role for the local community of which it forms a part, and maintaining its accessibility to bricks and mortar retailing and other town centre uses. The Eastgate Retail Park is in a format that is likely to prove more resilient to online competition than other forms in sub-prime locations. However, its resilience is currently being compromised by its out-of-centre status under a continuing town centre first approach of planning policy.
- 2.28 The evidence base confirms that the Council has failed to conduct a robust and properly evidenced assessment of all established retail locations, and in particular the city's four main retail parks to establish the role that they perform for local communities and the accessibility



that they maintain to bricks and mortar town centre uses. The current hierarchy of centres is therefore anachronistic, and does not reflect current market circumstances with the existential threat to physical retailing from online platforms. The focus should now properly shift from a priority protection of existing centres from out-of-centre competition, to a priority to support and enhance the city's stock of bricks and mortar retailing that is important in maintaining accessibility to physical retailing and other town centre uses, and therefore to sustaining inclusivity and equality of opportunity.

- 2.29 It seems inevitable that there will be some casualties, in particular in terms of more established centres with outmoded premises in sub-prime locations that are not adaptable to contemporary operator requirements. However, that is a transition that will continue regardless since it is the consequence of online platforms rather than physical, in-city competition. The risk is that, without a more flexible and broader-based application of policy that adjusts appropriately to current market circumstances, physical locations (such as the Eastgate Retail Park) that have the potential to respond and adjust and continue to serve the local community, will be locked into a spiral of decline to the wider detriment of local communities.
- 2.30 The impact of online platforms has been compounded by the incremental extension of permitted development rights over recent years. In particular, the introduction of Class MA, has further weakened already struggling smaller centres through the fragmentation of shopping frontages and the loss of leisure uses. In consequence, retail parks are performing an increasingly important role in maintaining accessibility to local shopping and leisure facilities in decentralised locations.
- 2.31 In the case of the neighbouring established Stapleton Road District Centre, the evidence confirms that it has significant structural and other weaknesses that are reflected in a vacancy rate that exceeds the national average. Commonsense and logic dictates that a strong trade magnet on its doorstep comprising operators and uses that would not otherwise be present in a sub-prime location, can only enhance the prospects for its vitality and viability. The focus should therefore be on enhancing connectivity and linkages between to two, complimentary locations to capitalise upon the opportunity provided by the adjoining trade magnets.



Conclusion and Recommendations

- 2.32 In conclusion on this matter, and in direct response to the Inspectors' question, for all of the foregoing reasons the centre network and hierarchy contained within the policy is not justified. In particular because it has failed to afford due regard to the important role for local communities performed by retail parks, and their potential future importance in this respect in the context of extremely challenging retail market circumstances. In that it fails to define a network and hierarchy of centres that will be resilient to current and likely future market circumstances and consequences, it has failed to respond appropriately to the rapid changes in the retail and leisure industries.
- 2.33 There is nothing within the definitions set out in national policy that precludes retail parks being defined as town centres. The Council's rebuttal of CPG's representations on the basis that the retail park is not considered to be a centre, is therefore unjustified and inconsistent with national policy. Moreover, it is not supported by the evidence of how it functions for the local community of Lockleaze. There are local examples in neighbouring authorities of new town and district centres to serve strategic growth locations which have the form and character that is typically associated with retail parks. This confirms that it is likely to be such formats, in optimal locations, that prove to be the most resilient going forward.
- 2.34 The Eastgate Retail Centre performs an important local community function. Whilst its format and composition means that it may be more resilient to online platforms than other, more traditional town centre constitutions, that resilience is compromised by its current out-of-centre status.
- 2.35 To protect its role and function going forward, and to help sustain bricks and mortar retailing in the face of the exponential growth of online competition, the Eastgate Retail Centre should be designated as a district centre to facilitate it to evolve and diversify in response to the rapid changes in the retail and leisure industries. It is an important physical asset providing town centre uses within the city of Bristol, and the policy framework needs to reflect that in the context of intense non-physical competition.
- 2.36 For all of the foregoing reasons it is therefore submitted that Policy SSE1 is unsound in that it is unjustified, will be ineffective and is inconsistent with national policy. The Inspectors are therefore, respectfully, requested to recommend to the Council that the Eastgate Retail Centre



CPG (Bristol) Ltd
Matter 9, Issue 9.1, Q9.1(b)

be designated as a district centre to reflect the important community role that it performs, and to sustain its vitality and viability going forward.



